

Fair Housing Assessment



Assessment of Fair Housing (2023-2027)

PREPARED BY CITY OF OLYMPIA, THURSTON COUNTY, HOUSING AUTHORITY OF
THURSTON COUNTY

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I. Land Acknowledgement¹

We want to offer our gratitude to the rightful stewards of the land where we currently reside in the areas today known as the South Puget Sound and Thurston County. Sovereign tribal nations include the Squaxin, Nisqually, Chehalis, Cowlitz, and Puyallup tribes.² There are many other tribes, past and present, that are not officially recognized as sovereign entities, but nevertheless shape the history and culture of the region in immeasurable ways.

Through the signing of the Medicine Creek treaty in 1854, the tribes lost a great deal of their usual and accustomed areas for practicing their culture. They were furthermore restricted from practicing their ancient traditions; as missionaries and settlers encroached in the area and brought with them Western philosophies that forbade the religious and cultural practices they considered offensive.

Even their languages were nearly extinguished as the government and like-minded entities sought to assimilate the people into submissive citizenry. These tribes survived this encroachment brought on by the largely one-sided treaty negotiations, just as they survived the subsequent breaking of most of the treaty agreements made with the United States. Agreements that were written to ensure the people could continue to live in their ancestral lands and practice their traditions without prejudice.

We recognize that the histories of this land carry physical, cultural and spiritual violence on an unimaginable scale. We see this legacy of colonial racism continue to play out in so many ways across the world. We acknowledge that we have a lot of work to do to address the ways that the violence of racism and colonialism are still being enacted on communities every day.

Historical Context & Resources

Local historians have created tools for us to learn about the exclusion and displacement of indigenous and people of color in our community over time. A [recent walking \(or virtual\) tour](#) of Olympia offers historical markers and teachings from Squaxin Island tribal members, descendants of Chinese business owners, and others. These stories share important history about displacement of indigenous people to reservations (ceding 250 million acres in the Medicine Creek Treaty), and actions to threaten or exclude Chinese immigrants in Olympia around the time of the Chinese Exclusion Act in the late 1800s. Dr. Thelma Jackson collected oral histories from Black community members who resided in the area between 1950 and 1975 in her book '[Blacks in Thurston County, Washington](#).' In Dr. Jackson's book, several contributors shared stories of harassment by white neighbors who attempted to dissuade Black community members from purchasing homes in their neighborhoods, realtors steering them towards certain areas (Lacey and in particular to Tanglewilde), or increased prices when the seller discovered the race of the potential buyer. The book also spotlights local activists who worked to pass an 'open housing' ordinance to address housing discrimination in the area in 1968 (the same year the Federal Fair Housing Act was eventually passed). Emmett O'Connell shares additional history on passage of the open housing ordinances on his local blog.³

¹ Adapted from the Homeless Housing Hub

² <https://native-land.ca/> for more information on tribal territories in our region

³ <https://www.olympiatime.com/2019/11/how-did-our-housing-practices-shape.html>

Olympia has been identified as a possible sundown town by oral accounts such as this [one](#), which is a term for a town which excludes people of color from remaining in town after sunset (either through local ordinances, violence, restrictive covenants that prevented people of color from owning property or other means): *During World War II, “a large percentage of the soldiers stationed at Fort Lewis...were black...My dad told me about the prohibition of blacks in Olympia after some specified time of day and also about the percentage of blacks at Fort Lewis, I believe. After work he used to go out of his way to pick up the black soldiers and haul them up to Fort Lewis because he felt sorry for them being stranded at Olympia.”*⁴

Historical practices of redlining and restrictive covenants created segregated housing patterns both locally and nationally. Redlining ‘was a government-sponsored practice where the HOLC (Home Owners Loan Corporation) specified whether neighborhoods were appropriate for investment based on the incomes and races of residents.’⁵ Racially restrictive covenants are a type of agreement that limits the sale, rental, or occupancy of housing to people of a particular racial or ethnic group.

University of Washington researchers from the Racial Restrictive Covenants Project are working to locate properties with racially restrictive covenants across Washington State⁶. So far, they have located over 1,800 properties in Thurston County that contained racially restrictive deed language preventing property owners from renting or selling to people of color. These types of restrictions became illegal when the Fair Housing Act was passed in 1968, but some language can still be found in title documents. Property owners can check to see if their home’s title has any racially restrictive language and learn how to remove that language by contacting the [Thurston County Auditor’s Office](#).

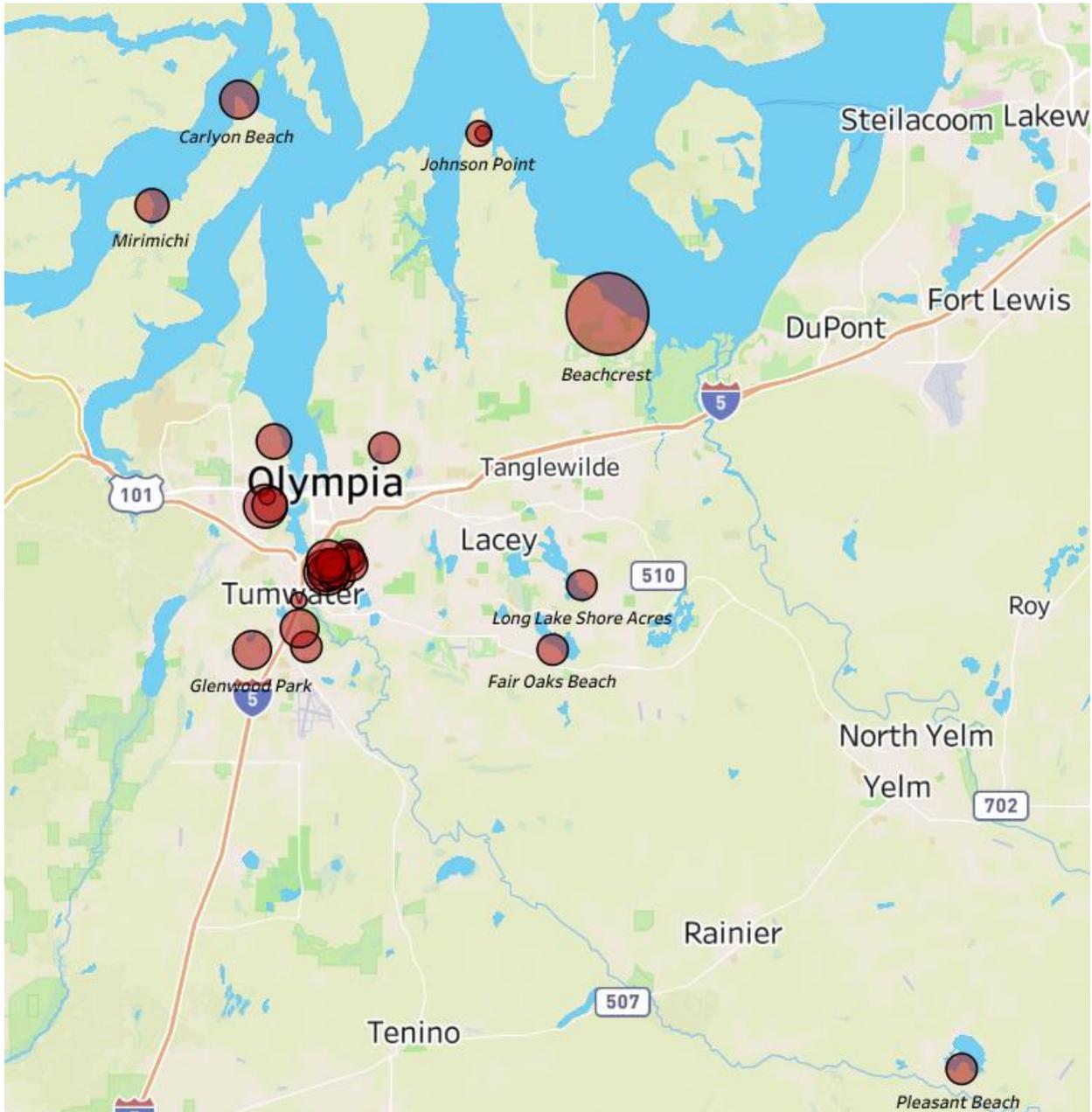
While generally Thurston County is characterized by fairly low levels of segregation, several areas that were historically restricted by race continue to be disproportionately white. Lacey continues to have higher populations of people of color than other areas of Thurston County. The map below shows subdivisions where restrictive covenants limited which races could purchase or rent property in Thurston County. While these racially restrictive covenants are no longer legally enforceable, there have been lasting impacts on the demographics of these areas. Over time, these areas have continued to be segregated through zoning practices and high housing costs.

⁴ <https://justice.tougaloo.edu/sundowntown/olympia-wa/>

⁵ https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Homeownership%20Disparities%20Recommendations%20Report%20-%20FINAL%20-%20Sep2022_e0b6a028-62cf-478c-aa9b-52e5e5c66609.pdf

⁶ UW researchers note that these are preliminary findings and subject to revision, and that they are still adding and confirming data.

Racially restricted subdivisions in Thurston County

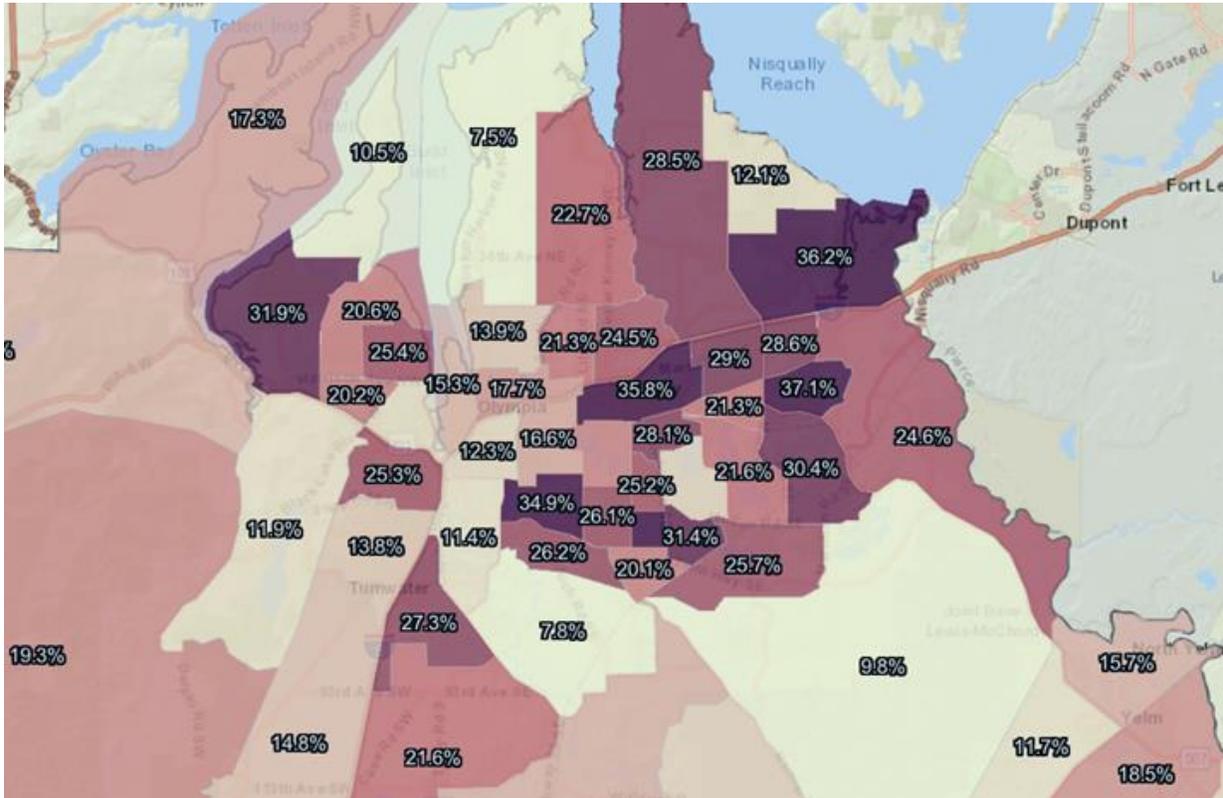


Source: Racial Restrictive Covenants Project Washington State, Civil Rights and Labor History Consortium, University of Washington⁷

⁷ https://depts.washington.edu/covenants/county_thurston.shtml (map retrieved February 17, 2023)

From UW webpage: On the map above, do not assume that areas without circles were not restricted. Restrictive covenants were only one of the mechanisms of segregation. Neighborhoods without covenants often practiced racial exclusion by other means. There is a logic to the geography. Areas platted (subdivided) between 1925 and 1948 were most likely to be restricted. Realtors and developers wrote racial exclusions into the initial documents

The map below uses American Community Survey data from 2016-2020 to identify census tracts with higher percentages of people of color in the same region as the map above. Darker purple shading indicates higher population of people of color while lighter yellow shading indicates lower population of people of color. White, Hispanic/Latinx individuals are not included in these percentages, but Hispanic/Latinx individuals of other races are included.



The maps indicate that many of the areas with a high percentage of racially restrictive covenants are still predominantly white, compared to other areas. Beachcrest, around Olympia High School, in Tumwater along Capitol Boulevard are a few areas where racially restrictive covenants were present and white residents still comprise close to 90% of the population. Countywide, approximately 80% of the population is white. Several of these areas today have lower levels of poverty, access to schools that perform well on state exams, high labor market participation, and other access to opportunities.

While redlining and racially restrictive covenants have been illegal for decades, zoning laws often reinforced segregation by maintaining areas where only single-family homes were permitted (frequently by attempting to preserve the ‘character’ of neighborhoods predominantly populated by white families). Single-family homes have traditionally been owner-occupied, rather than rented, with higher property values that lead to increased collection of local property taxes. Schools and other public services received higher funding from these local property taxes. White households were able to create

subdividing a future neighborhood. All properties in the subdivision were thus legally restricted. It was more complicated to restrict older areas. Neighborhood associations sometimes organized petition drives and convinced white homeowners to add racial restriction clauses to their properties.

household and generational wealth from the appreciation of their home's value over time. In 2020, median home values in Tanglewilde (an area of Lacey) were about 25% less than median home values in the area around Olympia High School. Areas that were zoned to allow multifamily units (typically rented rather than owned) were often located in commercial areas, with less access to high performing schools and other opportunities. Local land use and development standards that were designed to maintain character and quality of life in single-family zoned neighborhoods resulted in higher development costs and fewer diversity of housing types in these existing neighborhoods. Not-In-My-Backyard (NIMBY) attitudes are directed at higher density housing, which often includes rental housing. Considering that people of color rent at higher rates than the white population, NIMBY and zoning arguments can (whether intentionally or unintentionally) further segregation.

DRAFT

II. Executive Summary

Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Why was the Assessment conducted and how will it be used?

This Assessment of Fair Housing was completed collaboratively between the Housing Authority of Thurston County, Thurston County, and the City of Olympia. Fair housing planning efforts (such as this assessment) are required by recipients of HUD funding (examples include Community Development Block Grant funding and HOME funding). This assessment will be used to inform spending of federal funds, create goals and strategies to advance fair housing in Thurston County, as well as inform other program areas and policies.

According to HUD: In addition to barring housing discrimination, the Fair Housing Act requires HUD and its funding recipients, such as local communities, to also take affirmative steps to remedy fair housing issues such as racially segregated neighborhoods, lack of housing choice, and unequal access to housing-related opportunities.

What is the Fair Housing Act?

The Fair Housing Act prohibits discrimination in housing based on protected classes. Those federal (nationwide) protected classes include:

- Race
- Color
- National Origin
- Religion
- Disability
- Sex (HUD recently affirmed that complaints based on sexual orientation and gender identity discrimination may be submitted for investigation)
- Family status

The Washington State Law Against Discrimination includes all the protected classes above, and additionally:

- Honorably discharged veteran or military status
- Marital Status
- Immigration or Citizenship status

Complaints of housing discrimination based on the protected classes listed above may be filed with HUD or the Washington State Human Rights Commission for investigation.

The Washington State Residential Landlord-Tenant Act also prohibits housing discrimination based on source of income, such as SSI or use of a Section 8 voucher. While there is no government enforcement agency that investigates housing discrimination complaints based on source of income, many individuals file complaints with HUD or the Washington State Human Rights Commission based on disability if they

experience discrimination due to receiving disability-related income (like SSI or SSDI) or have a housing voucher that relates to their disability.

HUD guidance and case law have affirmed that domestic violence survivors can file complaints on the federally protected basis of sex (because survivors are disproportionately female). HUD guidance also directs housing providers to refrain from having overly restrictive criteria regarding criminal history (such as a blanket 'no felony' policy) due to disparities in the criminal justice system that unfairly impact people of color (particularly Black and Hispanic/Latinx individuals). Additionally, fair housing laws protect against retaliation, so if someone exercises their fair housing rights and faces negative treatment, they may file a complaint based on retaliation.

Fair housing laws don't just protect against discrimination, they also seek to undo harm caused by segregation and other disparities so that everyone can live and thrive. This directive under the Fair Housing Act is known as affirmatively furthering fair housing.

Background on the Assessment of Fair Housing & Requirement to Affirmatively Further Fair Housing

Prior to 2015, recipients of HUD funds were required to complete fair housing planning in the form of an Analysis of Impediments to Fair Housing Choice. These fair housing planning efforts were meant to guide local spending of federal funds and provide assurance that federal funds weren't being used (whether intentionally or unintentionally) to further segregation or limit housing options for members of protected classes. In 2015, HUD released a new Affirmatively Furthering Fair Housing rule which required funding recipients to assess fair housing issues in their community, identify fair housing priorities and goals, and then commit to meaningful actions to meet those goals and remedy identified issues, with HUD reviewing each assessment. HUD created an Assessment of Fair Housing tool to be completed by funding recipients. HUD provided data and mapping resources for use in this process. HUD's primary goals in the Assessment of Fair Housing analysis were to:

1. Reduce disparities in access to opportunities and important community assets such as quality schools, job centers, and transit.
2. Narrow gaps that leave families with children, people with disabilities, and people of different races, colors, and national origins with more severe housing problems, aka., disproportionate housing needs.

The last presidential administration halted implementation of the Obama-era Affirmatively Furthering Fair Housing rule, suspending the requirement to complete an Assessment of Fair Housing until 2020. In July 2021, HUD issued an interim final rule which required funding recipients to certify that they will affirmatively further fair housing (advance fair housing efforts), but did not require submission of a report or type of fair housing planning. HUD advised that recipients could elect to complete an Analysis of Impediments to Fair Housing Choice, an Assessment of Fair Housing, or an updated Assessment of Fair Housing (if they had completed one prior to suspension of the 2015 rule). Thurston County, City of Olympia, and the Housing Authority of Thurston County opted to complete the Assessment of Fair Housing (gathering and re-creating data and maps similar to those previously provided by HUD) to certify their efforts to advance fair housing in the community. An Assessment of Fair Housing was completed in 2017 for Thurston County before the rule was suspended. HUD recently issued a new

proposed rule, which will be required in future fair housing planning efforts. A new format and tool for analysis will be used in future reports.

Scope of this Assessment

This assessment is not a comprehensive analysis of all unique groups and barriers but provides a high-level scan of key challenges and disparities. We acknowledge that people with disabilities have unique individual circumstances and accessibility needs. Many people may have multiple protected class identities (such as being a person of color and a person with a disability) and challenges that arise because of those intersectional⁸ identities. We know that oppression and discrimination throughout society is interrelated and contributes to these challenges. For example, employment discrimination or involvement in the criminal justice system can often create barriers in housing access. We recognize the complexity of other compounding factors, as well as a history of exclusion and displacement which has led to the disparities that persist today.

A Note about Data Used

At the time of the report writing, much of the needed data was not yet available from 2020 Decennial Census, so American Community Survey 5-year estimates were used for the period of 2016-2020. Additionally, the 2020 Decennial Census used different methodology, which was intended to enhance privacy but can lead to some challenges when reviewing data at the more local level (by census tract or census block group). Much of the data and maps that HUD made available for use in the Assessment of Fair Housing had not been updated since the 2016 Assessment of Fair Housing was completed by Thurston County, City of Olympia, and Housing Authority of Thurston County (due to the halting of the 2015 AFFH rule). Report authors attempted to use similar data sets for more consistent comparison and used HUD-provided AFFH data that had been updated.⁹ However, we recognize that not all data sets are inclusive of all identities or backgrounds, or provide the most accurate reflection of community strengths and challenges. For example, 4th grade exam scores are not the only indicator of school performance but are used by HUD as an indication of school proficiency.

Community Outreach and Engagement for this Process

Thurston County, Housing Authority of Thurston County and City of Olympia partners created an online community survey open to all Thurston County residents. Over 600 individuals responded to the online community survey conducted in the Fall of 2022. Additionally, staff interviewed community advocates at the following organizations:

- Arc of Washington (serving the developmental disability community)
- CIELO (serving Latinx and immigrant communities)
- North Thurston School District staff
- Northwest Justice Project
- ROOF (Rochester Organization of Families)
- Tenant's Union of Washington

⁸ Intersectionality is a concept and term coined by Kimberlé Crenshaw

⁹ <https://egis.hud.gov/affht/>

- South Puget Sound Habitat for Humanity
- Veteran’s Affairs Puget Sound Health Care System (distributes HUD VASH vouchers for veterans)

Staff from Thurston County, City of Olympia, and the Housing Authority of Thurston County reviewed the data in the draft report, community survey data, and stakeholder interviews to develop a proposed set of goals and priorities. These goals and priorities were presented before the countywide Housing Action Team on March 8, 2023 for feedback. Staff incorporated feedback into the draft report and will include any additional feedback from the public comments and public hearings.

Key Findings

People of color, people with disabilities, people who are transgender, and single mothers are:

- **cost burdened at higher rates (pay more than 30% of their income on housing costs);**
- **more likely to be renters;**
- **at higher risk of displacement (being forced to move due to eviction, increasing costs, etc);**
- **more likely to experience homelessness; and/or**
- **face continuing gaps in homeownership in Thurston County.**

High rates of housing cost burden puts households at risk of displacement—they are either forced to move due to eviction or foreclosure, or forced to move to a more affordable area. The table below shows households that are cost-burdened—meaning they spend over 30% of their income on housing costs. As evident in the table below, renters face higher cost burden than homeowners in Thurston County, and a greater number of people of color are cost burdened than white Thurston County residents.

Thurston County Housing Cost Burden by Tenure and by Race/Ethnicity

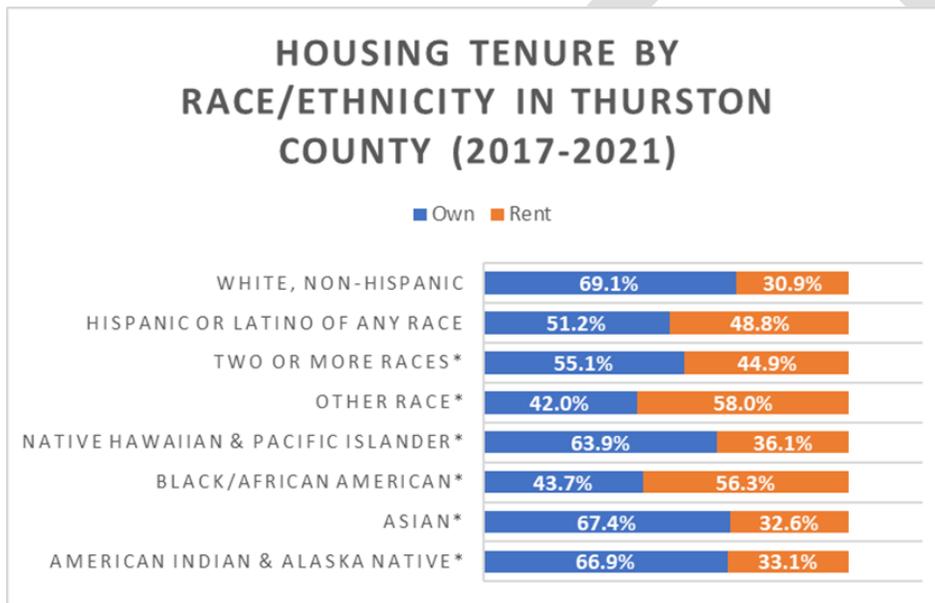
RACE OR ETHNICITY	Owner Occupied % cost burdened	Renter Occupied % cost burdened
White alone, non-Hispanic	21.3%	46.3%
Hispanic, any race	28.2%	59.0%
Asian alone, non-Hispanic	21.4%	52.0%
Black or African American alone, non-Hispanic	29.0%	50.0%
Other (including multiple races, non-Hispanic)	18.0%	49.0%
American Indian or Alaska Native alone, non-Hispanic	28.9%	67.3%
Pacific Islander alone, non-Hispanic	20.3%	60.0%
TOTAL HOUSEHOLDS	23.9%	54.8%

Source: HUD CHAS data, Tables 7 & 9

About 39% of respondents who completed the online community survey are cost burdened. Of those respondents, about 62% have disabilities or a disabled family member living with them. There were 15 total transgender respondents to the survey, and of those 15, 9 (or 60%) experience housing cost burden. Ten of 24 single mothers (42%) who responded to the community survey are severely cost burdened, spending over 50% of their income on housing costs.

About 46% (278 individuals) of survey respondents have considered moving out of the city or county where they currently live in the past year because their housing does not meet their needs. Most of those respondents (224 individuals or 81%) have considered moving because it is too expensive here. Nearly 67% of Native Hawaiian or other Pacific Islander, 62% of Black or African American and 57% of American Indian or Alaska Native respondents had considered moving in the past year, compared to 46% of white respondents.

About 44% of people of color are renters compared to 32% of white residents in Thurston County. About 56% of Black or African American Thurston County residents rent their homes.

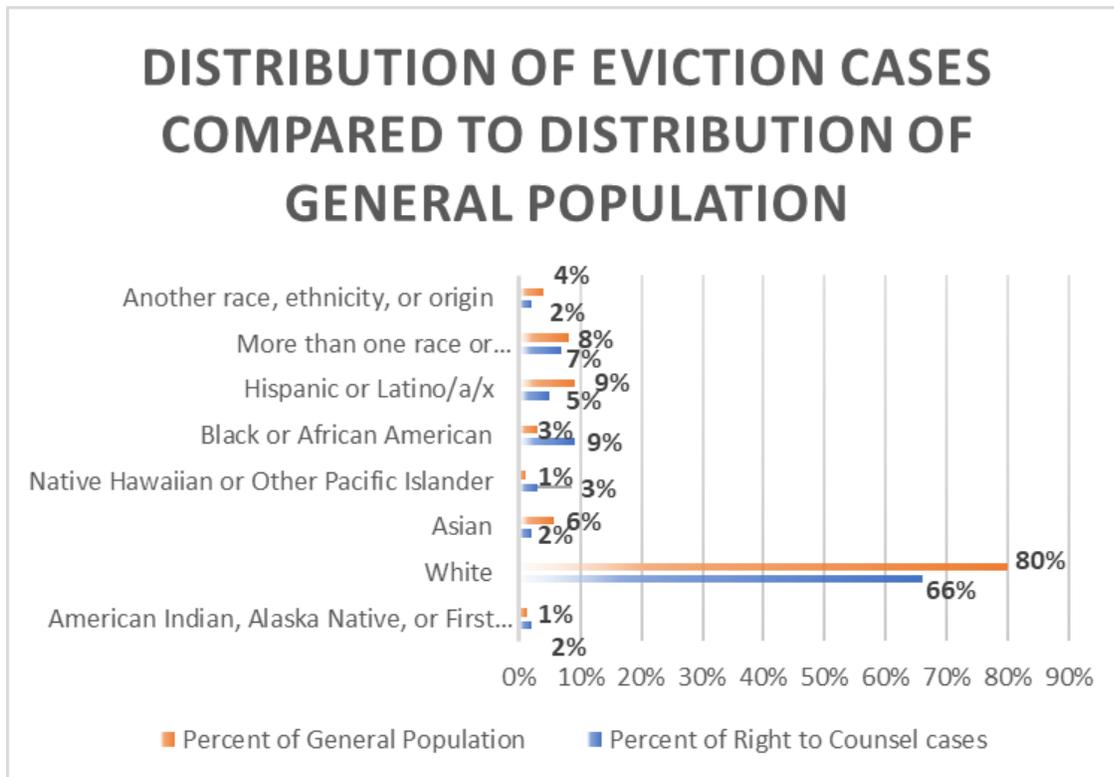


Source: American Community Survey 5-year estimates, 2017-2021

According to American Community Survey data, about 82% of single female-headed households with children in Olympia rent their homes and 62% rent their homes countywide. Thirteen of 15 transgender survey respondents (87%) rent their homes, and 47% believe they could be at risk of eviction or foreclosure in the next 6 months compared to 26% of cisgender survey respondents.

In 2021, Washington became the first state to authorize the right to an attorney in eviction proceedings for low-income tenants. Right to Counsel data from January 2022 to October 2022 indicates that Black or African American and Native Hawaiian or other Pacific Islander tenants were involved in eviction proceedings in Thurston County at nearly three times the rate of their proportion of the population. While Black or African American individuals comprise 3% of Thurston County’s general population, 8.5% of tenants assisted through Right to Counsel in 2022 were Black or African American. While Native Hawaiians or other Pacific Islanders comprise about 0.9% of Thurston County’s population, they

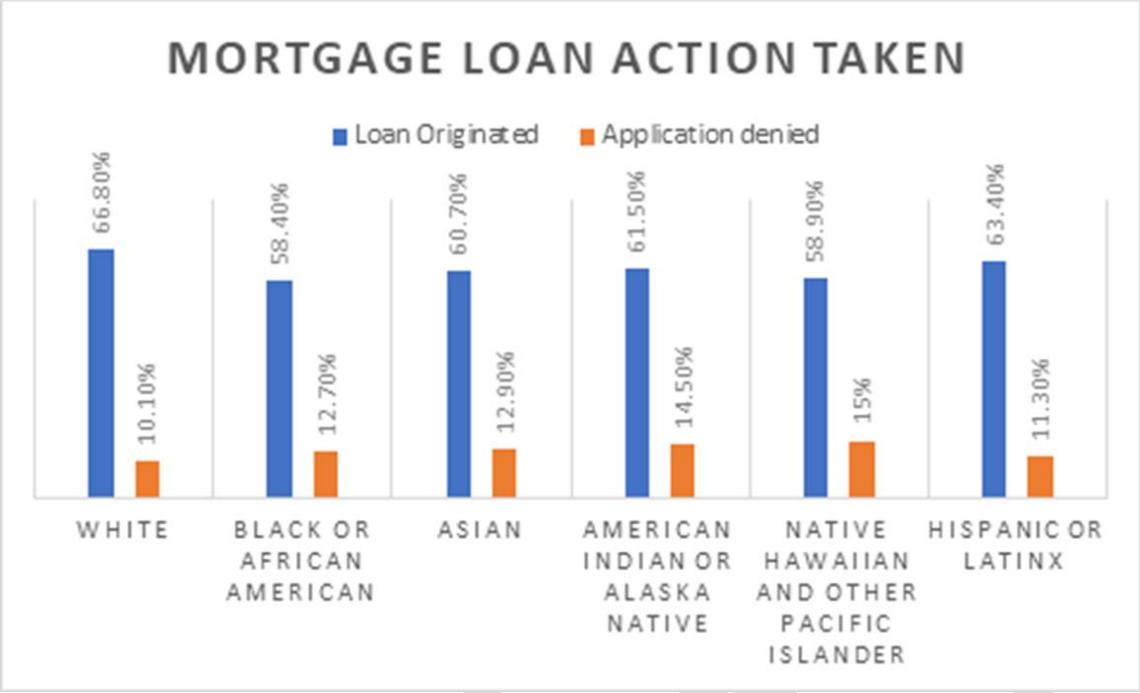
represented 2.8% of clients assisted by Right to Counsel for an eviction. Additionally, 26% of clients served by Right to Counsel indicated they had a disability, compared to 14% of the general population in Thurston County.



Source: Right to Counsel dashboard, Office of Civil Legal Aid

The 2020 Point in Time (PiT) Count found that people of color were overrepresented among those experiencing homelessness in Thurston County. According to the PiT, 7% of individuals experiencing homelessness were Black or African American (over twice the general population), 4% were Native American/American Indian individuals (four times the general population), and 10% were multiple races (almost twice the general population). Roughly 70% of individuals experiencing homelessness in Thurston County have a disability, compared to 14% of the general population. The 2020 PiT also revealed that the LGBTQ+ population is overrepresented in Thurston County’s homeless population: 12% of respondents self-identified as LGBTQ+ compared to a national average of around 4.5% of the general population. The 2020 PiT also revealed that about 2.1% of individuals experiencing homelessness self-identified as transgender or non-binary.

The figure below shows mortgage loan approval and denial by race in Thurston County from 2018-2021. White residents were approved at the highest rate (66.8%), while Native Hawaiian or other Pacific Islanders were denied at the highest rates (15%).



Source: Home Mortgage Disclosure Act data, 2018-2021

About 25% of community survey respondents with a disability or disabled family member have been denied a mortgage loan compared to 15% of respondents without a disability.

According to 2018-2021 Home Mortgage Disclosure Act (HMDA) data for Thurston County, white residents were more than twice as likely as Black or African American residents to obtain a conventional mortgage. Conventional mortgages are typically more likely to be selected by a seller when there are multiple offers on a home.

Across race and ethnicity, credit history and debt-to-income ratios are the most common mortgage loan denial reasons.



Source: Home Mortgage Disclosure Act data, 2018-2021

According to the report ‘Explaining the Black-White Homeownership Gap’ by the Urban Institute,¹⁰ ‘more than 50 percent of white households have a FICO credit score above 700, compared with only 20.6 percent of black households. Thirty-three percent of black households with credit histories have insufficient credit and lack a credit score, while only 17.9 percent of white households have missing credit scores.’ The report goes on to explain: ‘This is a key point because in the housing context, we know that most black households are renters and that rental payments are largely unreported to traditional credit bureaus. A black household may not own a home and pays only for rent, utilities, cell phones, and similar recurring expenses, but these transactions are not reported to credit bureaus in any positive way. Derogatory and negative credit reporting is common, but no credit is given for on-time payments of such critical and basic household items that would continue to apply in ownership.’

Survey respondents were most likely to report the following barriers to meeting their housing goals:

1. Cost of housing
2. Income too low
3. Debt to income ratios
4. Credit history

Income disparities contribute to difficulty in paying for housing and limit housing choice

The National Low Income Housing Coalition estimates that a Thurston County renter earning minimum wage would need to work 57 hours per week to afford a 1-bedroom apartment, would need to work 68 hours per week to afford a 2-bedroom apartment, and would need to work 96 hours per week to afford a 3-bedroom apartment. The annual income needed in Thurston County to afford a 1-bedroom unit is \$43,040. Annual income of \$50,920 is needed to afford a 2-bedroom unit and \$72,320 is needed to afford a 3-bedroom unit in Thurston County.

The table below shows the distribution of Thurston County households who earn below 30% of Area Median Income and 50% of Area Median Income by race and ethnicity. Nearly 42% of Native American households in Thurston County have income below 50% of Area Median Income. A household of one person in Thurston County that earns \$35,350 or less has income at 50% of Area Median Income by HUD program definitions. A household of 4 persons that earns \$50,450 or less has income at 50% of Area Median Income in Thurston County. By HUD definitions, a household of one who earns \$21,200 or less and a household of 4 persons that earns \$30,250 or less has income at 30% of Area Median Income.

¹⁰ https://www.urban.org/sites/default/files/publication/101160/explaining_the_black-white_homeownership_gap_2.pdf

Thurston County households by race and income

Total Occupied Housing Units by AMI	TOTAL HOUSEHOLDS	White (includes white, Hispanic and white, non-Hispanic)	Black or African American	Hispanic or Latinx	Asian or Pacific Islander	Native American
TOTAL Households	109,985	89,495	3,045	6,790	5,523	1,339
Households AMI 0-30%	13,240	10,435	360	1,370	760	315
Percent AMI 0-30%	12.0%	11.7%	11.8%	20.2%	13.8%	23.5%
Households AMI 0-50%	25,003	19,635	730	2,480	1,598	560
Percent AMI 0-50%	22.7%	21.9%	24.0%	36.5%	28.9%	41.8%

Source: HUD CHAS data, Tables 2 & 13

About 16% of Thurston County residents with disabilities have income below the federal poverty level, nearly 7% higher than individuals without a disability. Many individuals with disabilities rely on income assistance such as Supplemental Security Income (SSI). According to the 2022 Out of Reach report¹¹ by the National Low Income Housing Coalition, monthly rent of \$264 or less is affordable to individuals living on Supplemental Security Income at \$879/month (maximum monthly benefit). Supplemental Security Income (SSI) is a United States government program that provides stipends to low-income people who are either aged 65 or older, blind, or disabled. SSI payments will be increasing to a maximum of \$914 per month for a single individual in January 2023. Average rents in Thurston County in Fall 2022 were \$1,525¹². According to American Community Survey data, 26% of single mothers in Thurston County and 33% of single mothers in Olympia have income below the federal poverty level.

Accessibility Needs for Survey Respondents with Disabilities

Community survey respondents and community advocates report a lack of accessible and affordable housing units in Thurston County. Housing units with better accessibility features (new apartments or senior housing) are often costly.

Survey respondents indicated greatest need for minor modifications to units, specific property criteria and reasonable accommodations to policies:

- 56% require specific property criteria (such as few or no stairs, wider doorways, ground floor units)
- 52% require accommodations or changes to policies (such as a reserved parking spot near their unit, waiver of a no pet policy or pet deposit to allow a service animal)

¹¹ <https://nlihc.org/oor/state/wa>

¹² <https://wcrer.be.uw.edu/wp-content/uploads/sites/60/2022/10/Washington-Apartment-Market-Report-Fall-2022-Final.pdf>

- 32% need minor modifications to the property (grab bars, smoke detectors with visual alarm)
- 19% need structural elements to the larger building or neighborhood (such as curb cuts)
- 16% need accommodations in communications with a property manager (written vs. verbal communication, help understanding documents, interpreters, etc)
- 11% need significant modifications to their housing unit (such as lowered countertops and wheelchair ramps)
- 21% indicated some other accessibility need

One survey respondent shared: *'I am doing this survey on my brothers behalf due to his inability to access proper housing for a quadriplegic wanting to live independently as long as possible. The need for roll in showers, lower countertop and cooking safely. He has a hard enough time trying to get reliable caregivers and has lived at the same residence 30 years, never complains but doesn't want to create an issue because there are not enough apartments to meet his needs. Just feel that with new building codes and the amount of new apartments being built there should be several units built for persons with severe disabilities so choices can be made to move if necessary. Thank you for your time.'*

Another respondent shared: *'I am staying with my daughter, but her house isn't accessible so I sleep in her living room and have to use a commode in the living room and take a bed bath in the living room to wash because I can't get into the bathroom because of physical limitations with my disability.'*

Survey respondents and community members with disabilities also indicated a need for infrastructure improvements in neighborhoods and to support access to transit (such as sidewalks, curb cuts, crosswalks, and pedestrian lighting).

- About 40% of all survey respondents reported that their neighborhood is not accessible for people who use wheelchairs or other mobility devices
- 25% of survey respondents with disabilities indicated they have difficulty accessing transportation near where they live
- 24% of survey respondents with disabilities indicated they have difficulty navigating their neighborhood due to lack of sidewalks, curb cuts, crosswalks or pedestrian lighting

Disability community advocates stated there should be transit system improvements around pick-ups and drop-offs, rural routes should be more flexible to meet needs of riders, and there is a need for covered bus stops to protect riders from the elements. Advocates also noted that access to physician notes to access Dial-a-Lift services can be a barrier for individuals with disabilities who are experiencing homelessness, as it can take months to see a physician through the VA, Medicaid, or other services.

Mold, high heating and high cooling costs are top environmental health concerns in housing

About 58% of survey respondents are concerned by high heating costs or insufficient heat, 48% of respondents are concerned by mold, 45% of respondents are concerned by high cooling costs or insufficient cooling, and 33% of respondents are concerned by air quality/pollution. Around 19% of respondents indicated they had experienced health impacts as a result of these conditions. People with disabilities are often disproportionately impacted by these environmental health issues, as indicated in the community survey. Many survey respondents indicated housing conditions worsened their existing health conditions or disability-related symptoms:

- *'Heat (too hot) it causes an increase in seizure activity.'*

- *'Severe Headaches, severe cough, respiratory and sinus issues. Asthma flare ups.'*
- *'Gripe continúa por el frío'* (ongoing flu because of the cold)
- *'Mold gave me lung infections. Lack of accessible bathroom has caused falls and multiple injuries because I can't access my powerchair.'*

Some of the most marginalized community members are pushed out of the traditional rental market and face worse habitability and overcrowding issues

While HUD or Census data does not indicate that overcrowding or lack of kitchen or plumbing facilities are a significant issue in Thurston County, community advocates shared that these issues are likely underreported. One survey respondent shared: *'I live in a 5th wheel travel trailer that has no running water or heat. I'm 72 and have a heart condition so I can't do the repairs myself at this time.'* Community advocates described situations where people are living in substandard housing that is under the radar, such as sheds or carports, renting space for a RV in an open field with no access to water, sewer, or electricity. Advocates also described overcrowding situations where people stay with family or friends due to limited options, threat of eviction, or other circumstances. CIELO shared that, due to language barriers or lack of knowledge about the legal process, some tenants self-evict when they receive an initial notice (move out before formal eviction proceedings) and move in with family members.

Native American households face greater difficulty in accessing opportunities

HUD's data (using various Opportunity Indices) indicates that Native American households have the highest transportation costs of any racial/ethnic group, the lowest labor market engagement, and have more difficulty accessing public transit, job opportunities, and schools that perform well on state exams. HUD's data shows that Native American individuals are most likely to live in neighborhoods with higher concentrations of poverty.

Community survey respondents were asked how easy or difficult it is to get to various resources from where they live. About 38% of American Indian or Alaska Native respondents reported that it is somewhat difficult or very difficult to access job opportunities near where they live, compared to about 28% of white respondents.

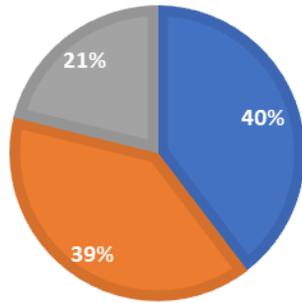
Thurston County residents are most likely to experience and report discrimination based on source of income, disability, race and family status

Forty-five fair housing complaints were filed with HUD and the Washington State Human Rights Commission in the past five years in Thurston County. Of those 45 complaints, 33 were based on disability, 10 were based on race and 4 were based on family status (individuals may file complaints based on more than one protected class).

Over 600 individuals responded to the online community fair housing survey. Forty percent of survey respondents have experienced housing discrimination or know someone who has experienced housing discrimination in Thurston County.

HAVE YOU OR HAS SOMEONE YOU KNOW EXPERIENCED HOUSING DISCRIMINATION IN THURSTON COUNTY?

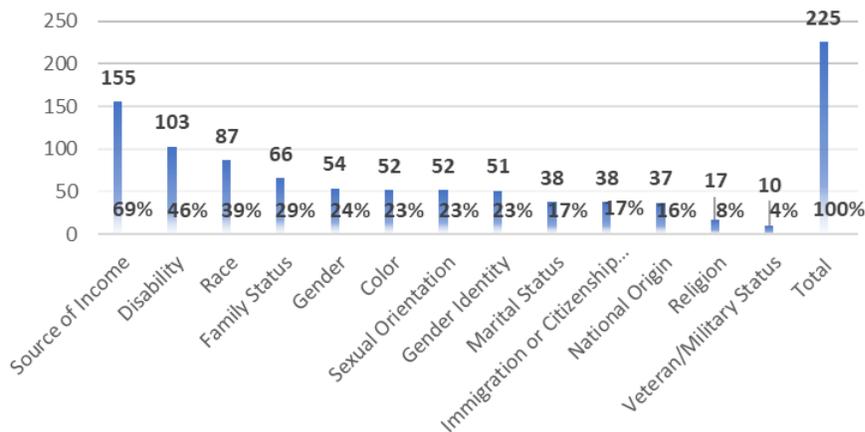
■ Yes/I think so ■ No/I don't think so ■ Not sure



Of the individuals who believed they or someone they know experienced discrimination:

- 69% reported the discrimination was based on source of income
- 46% reported the discrimination was based on disability
- 39% reported the discrimination was based on race
- 29% reported the discrimination was based on family status

DISCRIMINATION BASIS



Only 12% of community survey respondents who reported an experience of discrimination filed a complaint. About 63% of respondents didn't pursue filing a complaint because they didn't think it would make a difference and 68% of respondents didn't file a complaint because they didn't know who to contact. This indicates there is a lack of fair housing enforcement, mistrust, and lack of awareness or knowledge of complaint processes in Thurston County.

Contributing Factors to Fair Housing Issues

Through review of data, community survey results, and consultation with community organizations, the following factors were selected as key contributors to fair housing issues in Thurston County. Fair housing issues include: segregation, disparities in access to opportunities, disproportionate housing needs, disability access, and lack of fair housing outreach and enforcement. Key issues for Thurston County are housing cost burden and lack of affordable housing. Members of protected classes are primarily limited in their housing choice and access to opportunity by housing costs. Persons with disabilities are further limited by lack of accessible units and need for accommodations.

Lack of affordable, accessible housing in range of unit sizes: Community survey respondents were asked what (if any) barriers kept them from meeting their housing goals. Cost of housing was listed as the number one barrier to meeting community survey respondents' housing goals. Over 55% of respondents reported that cost of housing was a barrier to meeting their housing goal. About 74% of American Indian or Alaska Native respondents, 69% of Black or African American respondents, and 67% of Native Hawaiian or other Pacific Islander respondents indicated cost of housing was a barrier to meeting their housing goal.

Many more households are eligible than receive assistance from the Housing Authority of Thurston County (HATC). HATC maintains a waiting list, which was last opened to new applicants in January 2020 due to significant wait times and lack of capacity to meet the needs of eligible applicants. Currently there are 1,252 households on the waiting list. There are an estimated 25,003 households in Thurston County that earn below 50% of Area Median Income, who may be eligible for housing assistance if there was sufficient capacity to meet the need.

As rents sharply increased after the eviction moratorium ended in October 2021, many households were faced with sudden, large rent increases. According to rent estimates from the Washington Center for Real Estate research, in the past five years, average rents in Thurston County have increased approximately 47%. From 2021 to 2022, average rents increased about 31%.

Local Veteran's Affairs staff who work with veterans experiencing homelessness indicate that it is very difficult to find both affordable and accessible units. Many of the senior housing units with greater accessibility or newer multifamily units are above the rent limits (payment standards) for HUD VASH (Veteran's Affairs Supportive Housing) voucher participants. Many of the VASH participants are in their sixties or seventies, use wheelchairs, and cannot reside in units with stairs. VA staff report that it is very difficult to find ground floor units and units with other accessibility features like walk-in showers.

While there is not an accurate inventory of housing units accessible to people with disabilities, only about half of all housing units in Thurston County were built after 1990 and only 13% of residential properties have 5 or more units (multifamily properties built after 1991 with 5+ units are subject to accessibility regulations in the Fair Housing Act).

Private discrimination: Forty-five fair housing complaints were filed with HUD and the Washington State Human Rights Commission in the past five years in Thurston County. According to the community survey results, many individuals who have experienced housing discrimination do not pursue complaint filing. Of the 613 total respondents to the online community survey, nearly 40% believe they or someone they know has experienced housing discrimination in Thurston County and 20% were not sure if they or

someone they know had experienced housing discrimination. Only 12% of survey respondents who believed they (or someone they know) experienced housing discrimination stated they filed a complaint. This indicates that there is a much higher rate of discrimination experienced by Thurston County residents than is reported to HUD or the Washington State Human Rights Commission. Private rental discrimination was the most frequently reported by survey respondents, with 97% of respondents reporting that a landlord or property manager discriminated against them or someone they know.

The Washington State Human Rights Commission is the only organization in Thurston County which provides fair housing information and enforcement. The Human Rights Commission has limited capacity for outreach and has a backlog of cases awaiting investigation. The Fair Housing Center of Washington is located outside the jurisdiction (in Tacoma), but their service area includes Thurston County.

Source of income discrimination: Source of income was the most reported basis for housing discrimination in the community survey. Source of income includes benefits or subsidy programs including housing assistance, public assistance, emergency rental assistance, veterans' benefits, social security, supplemental security income or other retirement programs, and other programs administered by any federal, state, local, or nonprofit entity. About 25% of all survey respondents (155 individuals) reported that they or someone they know has experienced housing discrimination in Thurston County due to their source of income. In Washington State, source of income discrimination is prohibited in the Residential Landlord-Tenant Act (rather than the Washington Law Against Discrimination, which is enforced by the Washington State Human Rights Commission). There is a lack of enforcement for source of income discrimination, which is under the Washington Residential Landlord-Tenant Act. Since these protections are tenant-enforced, it can be difficult for tenants to navigate the legal process and access remedies.

Displacement (or risk of displacement) of residents due to economic pressures: High demand for housing and low vacancy rates are causing displacement of low-income persons, including protected classes, due to economic pressures. As indicated earlier, Black or African American, Native Hawaiian or other Pacific Islander and tenants with disabilities were involved in eviction proceedings and represented by Right to Counsel attorneys at a higher rate than their proportion of the general population in Thurston County.

Community survey respondents were asked about their experiences of displacement and fear of losing their housing. About 19% of Hispanic/Latinx respondents reported that they have experienced eviction or foreclosure, compared to 15% of white respondents. More people of color than white respondents worry they are at risk of eviction or foreclosure in the next 6 months. Increasing rent/housing costs was the most reported reason contributing to fear of eviction or foreclosure, followed by loss of income or employment. More people of color than white respondents reported they considered moving out of the city or county where they currently live because their housing does not meet their needs. The most reported reason for considering relocation was it is too expensive where they currently live.

Respondents were also asked if they had been forced to move in the past five years. About 20% of American Indian or Alaska Native respondents had been forced to move due to their landlord selling the unit, renovating the unit, or moving back into the unit. About 14% of Black or African American respondents experienced displacement when the rent increased after the landlord made improvements or repairs to the unit, compared to 8% of white respondents.

Land Use and Zoning Laws: According to Housing Authority of Thurston County (HATC) staff, voucher participants struggle to qualify for single-family homes or manufactured homes due to Housing Choice Voucher (HCV) program requirements that participants cannot pay more than 40% of their adjusted income towards rent and utilities. The HUD-set Fair Market Rents, which are utilized to set payment standards, has not kept pace with the increasing rents in Thurston County. Even marginal single-family homes and manufactured homes are outside the HATC payment standards. HATC has set its payment standards to the maximum allowed by HCV regulations. Multifamily housing integrated into neighborhoods that have traditionally been zoned for single-family homes will decrease segregation and increase access to opportunities for voucher participants, who are more diverse than the general population.

Communities have traditionally had many requirements for multifamily housing including amenities such as onsite parking, fire access, buildings that “match” the character of the neighborhood and traffic impact studies, etc. All these requirements of multifamily housing projects increase the initial cost and result in housing that expensive to build and maintain. While much progress has been made in recent years by local jurisdictions, the legacy of preference toward single family zoning has lasting impacts, and there are still considerable requirements to develop multifamily housing, which adds to project costs.

Screening policies and criteria: Low vacancy rates in combination with high rental prices have created a very competitive market, where there is less flexibility for tenants with barriers such as low or no credit history, previous evictions, high debt to income ratios, or other screening challenges. Considering the cost of housing, income to rent ratios where applicants are required to make three times (or more) the monthly rent are not attainable for many Thurston County residents.

Screening criteria often create barriers for voucher holders to access housing, even with rent subsidies offering a guaranteed form of payment. According to HATC staff, primary reasons for rejection include: lack of rental history, lack of credit, debt to income ratios, and evictions. Even if a judgement associated with an eviction has been paid by the tenant, applicants with vouchers are still being rejected by property owners.

In consultation with community advocates, credit history has been identified as a common barrier to accessing housing (both rental and ownership) for multiple protected class groups. Domestic violence survivors often experience financial abuse, which may include a perpetrator opening credit cards or bank accounts in the survivor’s name. Community members with disabilities often have medical debt. Undocumented community members lack a Social Security number, are often paid in cash, and have difficulty establishing credit history.

Content Warning: Suicide. A survey respondent shared the experiences of a friend who was transgender and died by suicide, after experiencing housing discrimination, homelessness, and rejection of rental applications due to her credit history. This community member felt she was being treated differently by apartment management and experienced harassment by other residents due to her gender identity. The landlord decided not to renew her lease agreement. She and her friend (survey respondent) attempted several times to get assistance through local service organizations and she was able to receive support through several local organizations but not to locate housing. She was receiving assistance to help pay rent but struggled to find a housing unit because her applications were rejected due to credit history (she had recently been through cancer and a divorce, which negatively impacted her credit score). Local organizations provided temporary hotel vouchers, but those ran out and she knew homelessness was

coming. Her friend indicated that she needed help finding places to rent and that even with rent support and disability income, was not able to locate housing.

Community survey respondents were asked which screening or application barriers concern them. Most respondents selected their income is too low and debt to income ratios are a barrier. Nearly 35% of Black or African American respondents and 31% of Asian respondents indicated their debt-to-income ratio is a barrier, compared to about 20% of white respondents. Credit history was the third most reported response. Black or African American, Asian, and Native Hawaiian or Pacific Islander respondents were more likely than white respondents to report that credit history was a barrier.

Goals and Strategies to Address Key Findings

Over 600 community members who responded to the survey prioritized the following strategies to increase equity and reduce disparities among protected classes in Thurston County:

1. More affordable housing and/or financial assistance for housing for low-income individuals and families
2. Increasing access to homeownership
3. Housing in a variety of types and sizes to meet various family sizes and needs
4. Reducing barriers to accessing housing (criminal history, credit history, etc)
5. Education about fair housing rights and responsibilities; and enforcement of source of income protections

While contributing factors to fair housing issues were considered countywide, every jurisdiction may not undertake each of the following goals. Some goals may best be pursued regionally, and others may be undertaken by one or more cities.

Many of these goals align with work outlined in local Housing Action Plans, the Regional Housing Council's Permanent Supportive Housing Strategy, Thurston County's 5-Year Homeless Crisis Response Plan and/or work underway by Housing Action Team subgroups. The Regional Housing Council's new Advisory Boards for Affordable Housing and Homeless Services could also provide guidance on these goals and priorities to ensure efforts make an impact on the disparities and fair housing issues identified.

The Regional Housing Council's Permanent Supportive Housing Strategy sets a goal to develop 150-200 permanent supportive housing (PSH) units by 2024, using the goal metrics from Thurston County's Homeless Crisis Response Plan (for 2019-2024).

Thurston County's 5-Year Homeless Crisis Response Plan for 2019-2024 established broad goals to:

- Create 300 permanent supportive housing (PSH) units
- Increase affordable housing inventory regionally
- Strengthen and extend multi-family tax exemptions to create 400 units
- Explore increased housing densities

A regional Housing Needs Assessment and resulting individual Housing Action Plans for Lacey, Olympia, and Tumwater includes goals to:

1. Reduce housing costs for low-income and cost-burdened households

2. Increase the overall housing supply
3. Increase the variety of housing sizes and types
4. Increase senior housing options
5. Maintain in good condition and improve the existing housing stock
6. Provide safe, stable options for both renters and homeowners
7. Increase permanent housing options for people with disabilities and those at risk of or experiencing homelessness

Goal 1: Increase affordable housing; provide financial assistance for housing for low-income individuals and families	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Support expansion of affordable housing inventory</p> <p>2) Increase affordable housing stock with development incentives</p> <p>3) Provide distribution of rental assistance to low-income households</p> <p>4) Explore options for tenant relocation assistance</p>	<p>-Lack of affordable, accessible housing in range of unit sizes</p> <p>- Displacement of residents due to economic pressures</p>	<p>-Segregation</p> <p>-Disparities in access to opportunities</p> <p>-Disproportionate Housing Needs</p>	<p>1) Funding for development or acquisition of housing units affordable to low-income households (below 80% AMI): 300 units over 5-year period (by end of 2027)</p> <p>2) Creation of resource page or developer toolkit to inform developers of affordable housing incentives: by end of 2025</p> <p>3) Locate additional funding for rental assistance to low-income households (particularly those at risk of eviction) and/or incentives for property owners to keep rents lower: by end of 2026</p> <p>4) Consider and recommend any relocation assistance programs for adoption: by end of 2026</p>	<p>-RHC & Advisory Boards</p> <p>-County</p> <p>-Cities</p>

Discussion: Local jurisdictions should continue to prioritize efforts to develop more affordable housing (housing that is affordable to households earning 80% or less than Area Median Income), particularly for lower income households (below 50% AMI), and leverage local funding with state/other funding sources. Jurisdictions have and should continue to prioritize development of affordable housing development or permanent supportive housing in allocating CDBG HOME American Rescue Plan, SHB 2060, Home Fund (HB1590), and HOME-ARP funds. Cities have and should continue to donate or lease surplus or underutilized jurisdiction-owned land to developers that provide housing affordable to low-income households.

Cities have and should continue to explore ways to make it easier for developers to build affordable units or incentivize development of affordable units. Jurisdictions could create expedited permit processing times and/or streamline land use process for affordable housing development.

Stakeholders have shared feedback that creation of a developer toolkit (or other centralized resource information) would be helpful. This resource would outline incentives and programs for affordable housing development offered by local jurisdictions. Cities with a Multifamily Tax Exemption program could offer an option for developers to pay into an affordable housing fund, rather than include affordable units, that cities can leverage for other projects.

Local jurisdictions or the RHC could offer deeper subsidies or higher scoring on RFPs for developers who include more set-aside units that are accessible to people with disabilities, affordable to lower income households, and/or market units to community organizations serving protected class groups.

Document recording fees will contribute to local funding for rental assistance, but local jurisdictions could supplement those funds—particularly for low-income renter households that are at risk of eviction and homelessness. Thurston County was able to distribute COVID-19 rental assistance to community groups by contracting with organizations such as CIELO, who helped deploy assistance to Spanish-speaking and immigrant community members.

Cities could explore tenant relocation assistance programs and/or move-in cost support to help low-income households transition to new housing. Under [RCW 59.18.440](#), Washington State authorizes jurisdictions to implement a relocation assistance program (cost may shared by city and by landlord) for tenants who are displaced when a housing unit is substantially renovated, demolished, condemned, or converted to another use (such as apartments to condos). Cities could also explore implementation of an Economic Displacement Relocation Assistance program, such as Seattle implemented in 2022. [Seattle's ordinance](#) requires landlords to pay relocation assistance to low-income tenants who have been displaced by a substantial rent increase.

Goal 2: Increase access to homeownership	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Provide support for low to moderate income households to access homeownership</p> <p>2) Explore non-traditional ownership models (limited equity co-ops, land trusts, etc)</p> <p>3) Strengthen partnerships with homeownership partners and share information with public when funding opportunities or programs become available (WA State Housing Finance Commission, programs by financial institutions, nonprofits, etc)</p>	<p>-Lack of affordable, accessible housing in range of unit sizes</p> <p>-Displacement of residents due to economic pressures</p>	<p>-Disparities in access to opportunities</p> <p>-Disproportionate Housing Needs</p>	<p>1) Provide funding for homeownership activities (such as credit counseling or down payment assistance): by end of 2024</p> <p>2) Review options for nontraditional and affordable homeownership: share study findings by early 2024</p> <p>3) Create and/or share web-based information with public regarding homeownership support (focus on community groups who have had less access to homeownership opportunities): 2-4 times each year</p>	<p>County</p> <p>Cities</p> <p>Housing Action Team</p> <p>RHC & Advisory Boards</p>

Discussion: One barrier identified to homeownership is no or low credit history to qualify for a mortgage. Thurston County has a gap in credit counseling or repair programs. Habitat for Humanity of South Sound has indicated that credit counseling programs are most effective when tailored to the individual and facilitated by a presenter that can convey information in an easily understandable format that is relevant to their experience (sometimes this is not the case with a bank or other financial institution). Any credit counseling or other homeownership support activities should include wraparound services that connect prospective homebuyers with resources and programs to guide them through the process of purchasing a home.

Washington State Department of Commerce has a [Homeownership Disparities Workgroup](#) that recently published a [report](#) on reducing disparities in homeownership for people of color. Jurisdictions can learn more by attending meetings and becoming better connected with the new

Homeownership Unit created by Commerce. Organizations are developing programs such as [first-generation homebuyer assistance](#), [special purpose credit programs](#) and other [initiatives](#) designed to provide homeownership assistance to [people of color](#) or others who have had less access to homeownership opportunities.

Jurisdictions can explore options and program models that will lessen the gap in homeownership for our community, and funding for the best-suited program to our community's needs. City of Olympia will be exploring models for affordable homeownership in a housing study in 2023. Study results may be shared with the Regional Housing Council. Thurston County could also explore any additional property tax exemptions or relief programs that would allow low-income households to purchase a home. Lower income households are not able to qualify for mortgage loans due to high home values and property taxes are taking up an increasingly larger portion of that value. There is no housing inventory available in the price range accessible to lower income households who are served by many of the available local and state assistance programs.

Jurisdictions have partnered with Habitat for Humanity of South Sound to provide donated land or land at a reduced cost, and other incentives to support homeownership activities. Cities can provide education to developers and incentives for use of the 20-year Multifamily Tax Exemption to sell to a nonprofit to create affordable homeownership units.

Jurisdictions can provide information to the public about programs that help low to moderate income households access homeownership offered by local or state programs and financial institutions. Jurisdictions can affirmatively market these resources and information to community groups (such as organizations that serve people with disabilities, people of color, people who speak languages other than English, people who are transgender or nonbinary, tribal members, etc). Arc of Washington staff have provided feedback that family members who care for a household member with developmental disabilities often have to leave the workforce to provide support and are at risk of losing housing. Affordable homeownership could help stabilize these caregiving families.

Goal 3: Increase housing in a variety of types and sizes to meet various family sizes and needs	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Support expansion of accessible housing inventory</p> <p>2) Support expansion of ADU and other housing types</p> <p>3) Provide support for accessibility modifications in existing housing</p>	<ul style="list-style-type: none"> - Availability of affordable units in a range of sizes - Land Use and Zoning Laws - Lack of assistance for housing accessibility modifications - Lack of affordable, integrated housing for individuals who need supportive services - Displacement of residents due to economic pressures 	<ul style="list-style-type: none"> - Disproportionate Housing Needs - Disability and Access -Disparities in access to opportunities 	<p>1) Reduce parking requirements to incentivize affordable housing near transit: by mid-2024</p> <p>2) Explore feasibility of offering impact fee waivers or other incentives (reduced connection fees, etc) for ADUs that meet affordability standards, create accessible units for persons with disabilities, partner with a local nonprofit provider and/or meet other metrics: by end of 2024</p> <p>3) Create pre-approved ADU plans that include enhanced accessibility design and construction features to increase units accessible to persons with disabilities: updated ADU plan or list of enhancements by end of 2024</p> <p>4) Ensure adequate mix of bedroom sizes and/or increased accessibility needs are reflected in residential development by adding requirements into affordable housing RFPs: 1-5 housing units</p>	<p>Cities</p> <p>County</p> <p>RHC</p>

			<p>per housing project to support enhanced accessibility for residents with disabilities and/or families with children</p> <p>5) Provide referrals and funding to support accessibility modifications in existing units: 20-25 housing units improved each year</p> <p>7) Strive to provide matching funds for developers seeking Housing Trust Fund DD Set Aside funding: 1-3 projects by 2027</p>	
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Discussion: Jurisdictions have made substantial progress to increase affordable housing development and density, including height and density bonuses and impact fee waivers for affordable housing. Cities of Lacey, Olympia, and Tumwater have created pre-approved ADU plan sets for property owners to add an Accessory Dwelling Unit. These plan sets already include several standard accessibility features, such as wider doorways. Enhanced accessibility (such as roll-in showers) could be offered in a pre-approved plan set or list of optional enhancements to increase the inventory of accessible housing units. Increased affordability could be offered by waiving impact fees or offering other incentives in exchange for keeping rents low.

Many neighborhoods with nearby access to transit, jobs, good schools, and other resources have very little vacant land that is suitable for development. Planning and zoning staff have indicated that infill housing types (like ADUs) are a good tool to increase density within neighborhoods near the urban core.

Most adults with developmental disabilities only have income through SSI (annual income under 30% AMI) and permanent supportive housing models with a behavioral health focus don't provide the type of support services needed. Housing that meets the needs of people with developmental disabilities is described as 'scattered site' housing – larger single-family homes (4-6 people), duplexes, and triplexes. Due to the way residential support services through Development Disabilities Administration are funded, individuals with developmental disabilities often need roommates to share staff and room for staff to provide care. Local jurisdictions could consider providing matching funds and letters of support for non-profit developers who build or manage scattered site housing with State Housing Trust Fund DD Set Aside funding.

Jurisdictions could also evaluate code changes to make it easier to convert unused commercial space for affordable housing.

Goal 4: Reduce barriers to accessing housing (ex: criminal history, credit history)	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Educate tenants and housing providers about how fair housing laws relate to screening process</p> <p>2) Explore ways to partner with and incentivize rental property owners to accept higher barrier tenants</p> <p>3) Explore policy solutions to reduce barriers to accessing housing</p>	<ul style="list-style-type: none"> - Screening criteria and policies - Displacement of residents due to economic pressures 	<ul style="list-style-type: none"> - Disproportionate Housing Needs - Disability and Access 	<p>1) Explore cost to contract with a third-party organization to provide training to landlords and tenants on fair housing and source of income discrimination laws (income to rent ratios) and disparate impact of overly restrictive criminal history policies: by early 2024</p> <p>2) Review models for countywide program to reduce barriers to entry: by end of 2024</p> <p>3) Review additional policy options from other jurisdictions: by end of 2024</p>	<p>Housing Action Team</p> <p>County</p> <p>Cities</p> <p>RHC & Advisory Boards</p>
<p>Discussion: In consultation with community advocates, credit history has been identified as a common barrier to accessing housing (both rental and ownership) for multiple protected class groups. Domestic violence survivors often experience financial abuse, which may include a perpetrator opening credit cards or bank accounts in the survivor’s name. Community members with disabilities often have medical debt. Undocumented community members lack a Social Security number, are often paid in cash, and have more difficulty establishing credit history. Reports have indicated people of color more frequently have no credit history or low credit scores. On-time rental, utilities or cell phone payments are not reported to credit bureaus in any positive way.</p> <p>Social service providers indicated that there is a need for more education about how fair housing laws relate to screening barriers like source of income and criminal history. Criminal history can sometimes be linked to disability and tenants may be able to request reasonable accommodations for a landlord to waive a policy (for example, a prior conviction occurred before a tenant went through treatment and rehabilitation for substance use). Information-sharing of best practices around reasonable accommodations in the screening process may also be helpful. Training about options for addressing previous evictions (order of limited dissemination or other means) could also be helpful for local tenants and service providers. More information about how fair housing laws relate to substance use disorders and reasonable accommodations would also be useful for local service providers.</p>				

Cities with rental property registries could explore ways to incentivize property owners to reduce screening barriers or rent at affordable rates. The Housing Action Team's Rental Housing Workgroup has been in conversation with Housing Connector about their program model to connect higher barrier tenants, tenants with housing vouchers, and/or tenants exiting homelessness to private market landlords. Additional models could be explored to find ways to incentivize property owners to be more flexible in their screening standards, such as offering a risk mitigation fund to match the state landlord mitigation fund programs.

Cities could explore additional local policy options for tenants. For example:

- Minneapolis and Philadelphia passed laws restricting the use of credit history in rental screening
- Seattle restricts use of criminal history in rental screening

Additional policies could be explored that:

- limit when eviction histories can be used (example: when a judgment has been paid off or an order of limited dissemination has been entered)
- limit income to rent ratios (such as not requiring more than proof of 2.5 times the monthly rent)
- do not subject tenants who are using a housing voucher to the same screening criteria regarding credit history, debt owed to a previous landlord or past evictions for nonpayment of rent prior to receiving voucher

Goal 5: Increase Fair Housing and Source of Income Discrimination education, outreach, and enforcement	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Housing provider education</p> <p>2) Housing consumer education</p> <p>3) Strengthen enforcement of state and federal laws</p>	<ul style="list-style-type: none"> - Private discrimination - Source of income discrimination - Lack of resources for Fair Housing agencies and organizations - Lack of local public Fair Housing outreach and enforcement - Lack of local private fair housing outreach and enforcement 	<ul style="list-style-type: none"> - Discrimination - Segregation - Disparities in access to opportunities - Fair Housing enforcement, outreach capacity and resources - Disability and Access Issues 	<p>1) Create or update web-based and print publications: by mid-2024</p> <p>2) Offer fair housing-related trainings or presentations to landlords, tenants and/or housing advocates (could include trainings outlined in goal 5 below): 1 - 3 per year</p> <p>3) Lobby State Legislature to strengthen and adequately staff the Human Rights Commission: once per year, each Legislative session</p> <p>4) Explore cost to contract with a third-party organization to enforce statewide source of income discrimination protections for Thurston County tenants: by mid-2024</p> <p>5) Explore cost to contract with a third-party organization to provide training on fair housing and source of income discrimination laws: by early 2024</p>	<p>Housing Action Team (Rental Housing Workgroup)</p> <p>County</p> <p>Cities</p>

Discussion: Survey results reflected a lack of information about how to file a complaint and lack of enforcement of existing protections. Continued complaints resulting from denial of reasonable accommodations also indicates that more education is needed for rental property owners.

The Housing Action Team’s Rental Housing Workgroup is in the process of creating a ‘Successful Renting’ curriculum for Thurston County tenants, which will include information on fair housing laws, reasonable accommodations, and source of income protections.

Cities of Olympia and Tumwater are exploring a landlord registry or permit, and City of Lacey already has a Multifamily Housing registration program. Web-based or in-person trainings could be required or shared with rental property owners in these jurisdictions. Cities could contract with a qualified Fair Housing organization to provide annual training, or refer to linked resources/recorded trainings. Property owners could certify that they attended training, or a list of attendees could be provided by the training organization. Incentives such as access to funding opportunities for property improvements could be provided in exchange for completing trainings. Cities could provide additional resources and referral information to tenants and rental property owners identified through the registries.

Source of income discrimination was the most reported form of housing discrimination in Thurston County, according to the community survey. Source of income protections are covered under the Residential Landlord-Tenant Act, and there is no government enforcement agency for the Residential Landlord-Tenant Act in Washington State. Many tenants have difficulty navigating the court process to enforce these provisions on their own. A third-party organization could be contracted to enforce these provisions for Thurston County residents, or referral methods could be improved.

DRAFT

While housing conditions were not listed under goals and strategies to increase equity and address housing disparities for members of protected classes, many survey respondents and community advocates have indicated concerns regarding heating costs or insufficient heating, cooling costs or insufficient cooling, and mold. As low-income community members are displaced from housing, many end up in substandard housing units, or under-the-radar rental situations.

Goal 6: Improve environmental health in housing units	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Improve health conditions in housing units and provide energy efficiency upgrades</p> <p>2) Provide education to tenants and landlords regarding environmental hazards like mold and lead paint</p> <p>3) Review and update codes to address mold prevention</p>	<p>- Lack of assistance for housing accessibility modifications</p> <p>- Displacement of residents due to economic pressures</p>	<p>- Disproportionate Housing Needs</p> <p>- Disability and Access</p>	<p>1) Provide funding for rental property owners and low-income homeowners for energy efficiency upgrades that improve air quality/circulation, weatherize units, improve heating and cooling: 20-25 units improved each year</p> <p>2) Provide trainings to landlords and tenants regarding mold treatment and prevention: 1-3 trainings per year</p> <p>3) Review best practices and codes adopted in other jurisdictions to address mold prevention and maintenance: by mid-2024</p>	<p>Cities</p> <p>County</p> <p>Housing Action Team</p>
<p>Discussion: According to advocates and the community survey, mold, high heating costs/insufficient heat and high cooling costs/insufficient cooling are top environmental health concerns in housing. Nearly 60% of survey respondents are concerned by high heating costs or insufficient heat, 48% of respondents are concerned by mold, 45% of respondents are concerned by high cooling costs or insufficient cooling, and 33% of respondents are concerned by air quality/pollution. Around 19% of</p>				

respondents indicated they had experienced health impacts as a result of these conditions.

People with disabilities are often disproportionately impacted by these environmental health issues in their housing, as indicated by a sample of respondents from the community survey:

- *'Heat (too hot) it causes an increase in seizure activity.'*
- *'Severe Headaches, severe cough, respiratory and sinus issues. Asthma flare ups.'*
- *'Gripe continúa por el frío' (ongoing flu because of the cold)*
- *'Mold gave me lung infections. Lack of accessible bathroom has caused falls and multiple injuries because I can't access my powerchair.'*

Thurston County and City of Olympia have used CDBG funding to make repairs or upgrades to housing units to improve health, safety, and energy efficiency, with an agreement to ensure that rental property owners do not increase rents after making property improvements. Jurisdictions can continue funding these programs and partner with local organizations to distribute funding.

The Rental Housing Workgroup (part of the Housing Action Team) is planning to include a training on mold in their 'Successful Renting' curriculum for Thurston County tenants.

Cities that are planning to include unit inspections in their rental housing registry/permit programs could review current codes regarding mold, heating and cooling, make code updates, and provide information about mold treatment and prevention, and funding opportunities for unit repairs. National Healthy Housing standards or other model policies could be reviewed.

Progress & Other Efforts Underway

In the past five years since the last Assessment of Fair Housing, Thurston County has taken important steps to address affordable housing and advance equity, including:

- Completion of a Housing Needs Assessment that resulted in Housing Action Plans for Lacey, Olympia and Tumwater. These Housing Action Plans include strategies to increase multifamily and affordable housing development, incentives for creation of affordable housing, tenant protections, and other measures.
- Cities of Olympia and Tenino, as well as Thurston County, passed Home Fund levies to create a dedicated funding source for affordable and supportive housing options.
- Local cities and Thurston County created a Regional Housing Council to pool funds and align efforts to address affordable housing and homelessness more effectively. The Council is in the process of creating Advisory Boards (one for affordable housing and one for homelessness) that will be comprised of community members who have lived experience (such as a person who has experienced homelessness, or who is a person of color), or who work on the frontlines of these issues. These Advisory Boards will provide funding and policy recommendations to the Council.
- Countywide housing and homeless services providers formed a research team to review best practices and develop a new assessment tool to prioritize individuals for shelter and housing placement based on their vulnerability when living unsheltered. The Housing Equity Assessment Tool (HEAT) better captures experiences of people of color and addresses underlying disparities that were observed by providers when using a previous assessment tool.
- During the COVID-19 pandemic, federal CARES Act dollars were distributed to local communities for rental assistance to prevent evictions. Thurston County contracted several community

organizations to distribute these funds. CIELO was contracted to ensure effective outreach and distribution of funds to Spanish-speaking and Latinx community members. Thurston County has issued approximately \$55 million in COVID-19 pandemic relief rent assistance since August of 2020.

- City of Olympia passed local tenant protections that limit deposits/move-in fees and prohibit collection of non-refundable move-in fees, limit pet deposits, and require more notice before increasing rents more than 5% or 10%.
- Cities of Olympia and Lacey have formed Equity Commissions. The Olympia Social Justice & Equity Commission will be conducting a community discrimination assessment on employment, housing, and other issues in 2023.
- City of Olympia requires an Equity Analysis for staff reports presented to City Council.

Statewide, some important milestones include:

- Washington State Legislature passed tenant protections to include source of income discrimination protections, Just Cause eviction standards (landlords must cite a reason allowed under state law for ending a tenancy), creation of a Right to Counsel program (providing low-income tenants the right to an attorney in eviction proceedings), requiring mediation prior to filing evictions, and immigration or citizenship status was added as a protected class under the Washington State Law Against Discrimination.
- Washington State Department of Commerce created a homeownership unit and formed a workgroup to address disparities in homeownership by race/ethnicity.
- Washington State Legislature now requires cities of a certain size to plan for and accommodate housing at all income levels (including shelter options and permanent supportive housing for persons experiencing homelessness). New requirements also include identifying and addressing impacts of housing planning on people of color, including past policies that created disparities and segregation.
- [HB 1474](#) is a bill proposed this year that creates a covenant homeownership account (through document recording fees) and program to address the history of housing discrimination due to racially restrictive real estate covenants in Washington state.

III. Community Participation Process

Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings.

Community Survey

The Thurston County Assessment of Fair Housing survey was developed by City of Olympia staff, with input from Thurston County Public Health & Social Services housing staff and Housing Authority of Thurston County. The online community survey was open for 9 weeks from October 3 to December 5, 2022. The online survey was available in 132 languages by using an automated translation feature selected by the survey participant. A total of 613 responses were received.

Information about the fair housing survey was distributed in the following ways:

- City of Olympia and Thurston County issued press releases

- News stories were published by the Olympian and the JOLT
- A copy of the press release with survey link was sent to 1,898 City of Olympia Housing & Homelessness email subscribers
- Housing Authority of Thurston County (HATC) staff distributed notices to all public housing residents and households with Housing Choice Vouchers (Section 8) through an outreach flyer in the mail, directing people to the survey website
- Flyers posted at: Olympia, Tumwater, Lacey, Yelm and Tenino libraries; Tumwater DSHS Community Service Office; local grocery stores in Rochester; U.S. Post Office in Bucoda and Rochester; local markets serving Asian and Latinx communities; Yelm cinemas; Yelm Head Start; Tenino Valley View Health Center; market in Bucoda
- Printed flyers and/or online via school websites, Facebook, and email with families and students in the following school districts: Tumwater, Yelm, Rochester, Olympia, North Thurston, Griffin. Information was also sent to Tenino and Rainier School Districts, but it is unclear whether that information was distributed.
- Flyers with survey link posted at the City of Olympia’s Listening Session for Black Community Members
- Survey link was emailed to community members who received COVID rental assistance
- Flyers posted at Thurston County Food Bank locations in Olympia and Lacey, and distributed at Tumwater drive-through food bank
- Flyers and survey link shared with faith communities (particular focus on spiritual communities serving communities of color, or with services conducted in languages other than English)
- Social media: posted on the City of Olympia’s Facebook, Instagram and Twitter accounts
- City of Olympia Downtown Ambassadors distributed connect cards with survey link
- Partnered with the Rachel Corrie Foundation to provide flyers at ArtsWalk and the event launch for the Olympia’s Hidden Histories walking tour project
- Email listserves: countywide Housing Action Team, Regional Housing Council members
- Flyers and survey link shared with organizations listed below, along with an invitation to connect with staff to provide further input about barriers faced by the community served by the organization

Flyers were translated into three commonly spoken and linguistically isolated (household members ages 14+ have at least some difficulty with English) languages across Thurston County: **Spanish, Vietnamese and Korean.**

Stakeholder Interviews

City of Olympia staff conducted stakeholder interviews to gather additional feedback. Key organizations included:

- Arc of Washington (serving the developmental disability community)
- CIELO (serving Latinx and immigrant communities)
- North Thurston School District staff
- Northwest Justice Project
- ROOF (Rochester Organization of Families)
- Tenant’s Union of Washington

- South Puget Sound Habitat for Humanity
- Veteran’s Affairs Puget Sound Health Care System (distributes HUD VASH vouchers for veterans)

Public Hearings & Public Comment

Public hearings on the Assessment of Fair Housing are scheduled for:

- March 23, 2023 for the Housing Authority of Thurston County (publicized on the HATC webpage and in the Olympian newspaper)
- March 28, 2023 for the City of Olympia (publicized on the City of Olympia webpage and in the Olympian newspaper)
- April 18, 2023 for Thurston County (publicized on Thurston County’s webpage and in the Olympian newspaper)

(Public comments and public hearing minutes will be added to this section after the closure of public comment periods and public hearings)

Organizations consulted during the community participation process

Flyers with information and the community survey link were shared with the following organizations, along with an invitation to connect with staff to provide further input about barriers faced by the community served by the organization:

Answers Counseling	Chehalis Tribe
Arc of Washington	Child Care Action Council
Area Agency on Aging	CHOICE Regional Health Network
Asian Pacific Islanders Coalition South Puget Sound	CIELO
Asset Building Coalition	Town of Bucoda
BHR (Behavioral Health Resources)	City of Lacey
BLAST (Black Leaders in Action & Solidarity Thurston)	City of Olympia
Bounty for Families	City of Rainier
Build A Bus	City of Tenino
Building Industry Association of Washington	City of Tumwater
Capital City Pride	City of Yelm
Capital Recovery Center	Columbia Legal Services
Catholic Community Services	Community Action Council of Lewis, Mason & Thurston Counties
Thurston County Chamber of Commerce BIPOC business roundtable	Community Court (Olympia)
	Community Foundation of South Puget Sound

Community Youth Services

City of Olympia's Crisis Response Unit and Familiar Faces

Disability Inclusion Network

Disability Rights Washington

Dispute Resolution Center of Thurston & Mason Counties

Dept. of Social & Health Services Home and Community Services, Office of the Deaf and Hard of Hearing

Eco Building Guild

EGYHOP

Enterprise for Equity

ESD 113 (Head Start programs)

Evergreen Home Loans (offers local first-time homebuyer classes)

Evergreen State College

Evergreen Treatment Services

Family Education and Support Services

Family Support Center of South Sound

Greene Realty

Griffin School District

GRuB

Habitat for Humanity

Hearing Speech & Deafness Center (Tacoma office)

Hispanic Roundtable

Homes First

Hometown Property Management

Innovations HTC

Intercity Transit

Interfaith Works

Japanese American Citizens League

Olympia Mutual Aid Partners

Korean Women's Association

Lacey Chamber of Commerce

Lacey Veterans Services Hub

League of Women Voters

Love Abounds Here

Low Income Housing Institute

Molina Healthcare

Morningside

NAMI (National Alliance on Mental Illness)

NARPM (National Association of Rental Property Managers) Olympia chapter

City of Olympia Neighborhood Associations

Nisqually Tribe

North Thurston School District

Northwest Cooperative Development Center

Northwest Justice Project

Northwest Resources

Office of Public Defense Parents Representation Program

Olympia Area Chinese Association

Olympia Downtown Alliance

Olympia Free Clinic (CCC)

Olympia Master Builders

Olympia School District

Olympic Rental & Landlord services

OPOP (Olympians for People-Oriented Places)

OSPI (Office of Superintendent of Public Instruction)

PacMtn Workforce

(PiPE) Partners in Prevention Education

Pathways Counseling

PCAF (Pierce County AIDS Foundation) – Olympia office

PFLAG

Pizza Klatch

POWER

Providence

Quixote Communities

Rainier School District

Rochester School District

ROOF (Rochester Organization of Families)

Rural Transit

SafePlace

SAGE (Services and Advocacy for LGBTQ Elders)

Salvation Army

Sea Mar

Senior Services of South Sound

SideWalk

South Sound BIPOC business directory

South Sound Parent to Parent

South Sound YMCA childcare

SPSCC

Squaxin Island Tribe

St. Martin's University

Stonewall Youth

Strengthening Sanctuary Alliance

SURJ (Showing up for Racial Justice)

Thurston County Volunteer Legal Services

Telecare

Tenant's Union of Washington

Tenino Boys & Girls Club

Tenino School District

Thurston County

Thurston County Chamber of Commerce

Thurston County Food Bank

Thurston County Realtors Association

Thurston Economic Development Council

Thurston Housing Land Trust

Thurston Regional Planning Council

Thurston Thrives

Timberland Regional Library

TOGETHER!

Tumwater Chamber of Commerce

Tumwater School District

Union Gospel Mission

United Way of Thurston County

Unruhly Medicine

Valeo Vocation

Valley View Medical Clinic

Veteran's Administration

Washington Landlord Association

Washington State Developmental Disabilities Council

WorkSource

Women of Color in Leadership Movement	Yelm School District
Yelm Chamber of Commerce	Yelm Senior Center
Yelm Community Services	YWCA

Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

There were 613 responses to the online community survey. Olympia residents were overrepresented in the survey, likely due to hosting on the Engage Olympia platform and increased outreach via the City of Olympia’s social media, email and other outlets. Over half (53.5%) of respondents indicated that they or a family member in their household has a disability, neurodivergence, mental illness or chronic illness. Countywide, American Community Survey (ACS) data estimates that 14% of the population has a disability. Fewer survey respondents than the general countywide population were born outside the U.S. (5.1% of survey respondents vs. 8.3% of the general population). One respondent (0.2% of survey respondents) answered questions in Spanish. Countywide, about 11% of the population speaks a language other than English at home and 4% of those individuals speak English less than ‘very well.’ Eighty respondents (13%) indicated they use a voucher or housing subsidy to pay their rent.

A proportionate number of families with children responded to the survey: 31% of respondents indicated they are pregnant or have children under 18 living with them compared to 30% countywide. Most survey respondents were between the ages of 25 and 64. Nearly half of respondents were between the ages of 25 and 44. This aligns with the county’s median age of 39.

The survey was designed to allow respondents to self-identify and select multiple races or ethnicities, so survey responses are more varied in comparison to Census or ACS data which requires respondents to select one race or select ‘two or more races’ without further detail. Overall, 81% of survey respondents identified as white, or white and some other racial or ethnic identity. A total of 72.4% of survey respondents identified as white, non-Hispanic without selecting another racial or ethnic identity. Countywide, ACS data estimates that 80% of the population is white, non-Hispanic. About 9% of respondents selected multiple races or ethnicities. Countywide, 7.8% of the population identifies as two or more races. There was slightly higher representation from Black/African American and American Indian or Alaska Native community members, and slightly lower representation from Hispanic/Latinx and Asian communities compared to the countywide population.

Starting the process earlier could have contributed to increased participation among community organizations and protected class groups. In the future, it may be helpful to contract with community organizations with services to diverse language groups to conduct focus groups or administer the survey. An extensive contact list of community organizations was developed for this process, however, outreach was mostly conducted by emailing the flyers. Flyers were distributed at all local Thurston County Food Bank locations, which are high traffic community hubs. It is difficult to assess how many

organizations printed and posted the outreach materials. In the future, it may be more effective to mail or drop off printed copies of the flyers. Due to the limited number of in-person events and low turnout during the COVID-19 pandemic, very little in-person outreach was conducted. An estimated five community members called the contact phone number listed on the survey to provide comments, rather than completing the online survey. Online surveys may not be accessible for all community members due to lack of computer or smartphone access, limited literacy, or limited technology proficiency.

Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

(Reserved for completion at end of public comment period)

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IV. Assessment of Past Goals, Actions and Strategies

Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents.

The following goals and metrics were identified in the Assessment of Fair Housing conducted in 2017:

1. Increase Fair Housing Education

1a. Housing Provider Education: Increase public education of Fair Housing laws for housing providers, including property owners and landlords, rental agencies, real estate and nonprofits. Develop regional partnerships for trainings and workshops, including what the protected classes are, and what the process is for filing a complaint. Explore a broad range of education tools, including flyers, online resources, professional organization newsletters, and other means.

1b. Housing Consumer Education: Increase public education of Fair Housing laws for consumers. Develop partnerships to provide regional trainings and workshops, including what the protected classes are, and what the process is for filing a complaint. Explore a broad range of education tools, including flyers, online resources, neighborhood organization newsletters, and other means.

1c. Neighborhood Organization Education: Encourage education and dialogue on affordable housing, rental housing, housing density, and Fair Housing choice as they impact neighborhood organization goals; engage neighborhood groups before the formal public hearing process for rezones.

1d. Central Fair Housing Info Link: 1) Create a singular web-based “Fair Housing information” site, with an accessible link from all city jurisdiction websites; 2) List all federal, state and local protected classes; 3) Provide information on how to file a discrimination complaint; and, 4) Identify places to get training on Fair Housing laws. One option would be to house the Fair Housing website page on Thurston County or Housing Authority website.

2. Better Enforcement of Fair Housing Laws

2a. Enhanced Enforcement of State Laws: Strengthen existing capacity for enforcement process of state Fair Housing laws.

2b. Enhanced Enforcement of Local Laws: Develop effective means of enforcement process of local Fair Housing laws.

2c. Track Data on Fair Housing: Develop internal mechanisms to continue evaluating Fair Housing on a local level. Find ways to link Fair Housing tracking to affordable housing needs, goals and mechanisms.

2d. Rental Safety Program / Landlord licensing: Consider existing Washington State landlord licensure program models (*Bellingham, Lakewood, Pasco and Tukwila*) to monitor and regulate safe, decent and sanitary housing, as well as to require Fair Housing compliance for locally protected classes, i.e. disability, family status, race and possibly source of income.

3. Increase Affordable and Accessible Housing

3a. Increase Affordable Housing Inventory: Provide support for profit and non-profit efforts to develop new housing units with long-term affordability for a broad range of low-income households, with an emphasis on dispersal of affordable housing throughout the County.

3b. Increase Accessible Housing Inventory: Increase accessibility to affordable housing for persons with disabilities and single parent familial status households (*households with children under 18 years*). This might include incentives, goals, and other public policies to encourage the production of new ADA accessible units, and/or the ADA accessible retrofit of existing units.

3c. Maximize transportation linked housing: Encourage more housing to be located near shops and services and along transportation corridors that offer multiple modes of transportation. Encourage public transportation access to expanded areas of all affordable housing, with particular emphasis on ADA accessible housing (*housing plus transportation equals housing costs*).

4. Source of Income as a Protected Class

4a. Countywide Laws to Protect Source of Income: Include “Source of Income” discrimination as a protected class Countywide (*currently protected by Olympia and Tumwater, and recommended by Washington State Analysis of Impediments to Fair Housing Choice 2015*).

4b. Standardize Language: Standardize language regarding all locally protected classes across Thurston County to ensure consistent public policy across Thurston County.

5. Incorporate Fair Housing Principles into Land Use Planning

(Given the strong correlation between availability of affordable housing and Fair Housing choice, zoning and development policies impact Fair Housing choice.)

5a. Review Zoning Impacts on Fair Housing: Encourage City jurisdictions to review local zoning maps and overlay with HUD maps of poverty and racial concentrations (*both of which are provided in the AFH report*) with regard to zoning impacts on fair and affordable housing choice; analyze location and type of housing to identify zoning impediments.

5b. Review Development Standards Impact on Fair Housing: Review development regulations to encourage mixed housing type zoning across the urban jurisdictions. Make strategic investments to encourage mixed-use neighborhoods: this could mean mixes of housing types (*duplexes, townhomes, single-family, apartments*) as well as neighborhood commercial centers (*places for people to gather and shop close to where they live.*)

5c. Foster Affordable Housing Incentives: Consider zoning/development incentives to promote affordable and accessible housing developments. These could include: density bonuses or permit discounts based on transportation access; deferred impact fees for affordable housing; use public and private dollars to apply toward development fees and impact fees; revise density bonus and zoning for cluster housing.

Discuss what progress has been made toward the achievement of fair housing goals.

In the last Assessment of Fair Housing conducted in 2017, nonprofit housing providers and social service providers from the Fair Housing Key Stakeholder Questionnaire identified source of income as the number one basis of discrimination their clients encounter in Thurston County. Respondents from the Thurston County Assessment of Fair Housing Survey self-selected source of income as the number one basis for discrimination in Thurston County.

In 2018, the Washington State Legislature adopted source of income protections under the Residential Landlord-Tenant Act. The passage of these protections addressed one of the five overarching goals identified in the last Assessment of Fair Housing. One of the goals identified in the last Assessment of Fair Housing was to adopt standardized language across jurisdictions related to source of income definitions to reduce potential for confusion. The statewide law clarifies and defines source of income in the statute: "source of income" includes benefits or subsidy programs including housing assistance, public assistance, emergency rental assistance, veterans' benefits, social security, supplemental security income or other retirement programs, and other programs administered by any federal, state, local, or nonprofit entity. "Source of income" does not include income derived in an illegal manner.

The 2017 Assessment of Fair Housing prioritized review of land use and zoning codes to encourage development of the full range of housing necessary to meet the needs of the community.

In 2021, the Washington State Legislature adopted changes to the Growth Management Act¹³ to instruct local governments to plan and accommodate for housing affordable to all income levels, including emergency shelters and permanent supportive housing. The Washington State Department of Commerce will issue guidance on efforts to increase density and to examine racially disparate impacts, displacement and exclusion in housing policies and regulations.

The cities of Olympia, Lacey, and Tumwater collaborated on a joint Housing Needs Assessment in 2021¹⁴. The cities worked with the Thurston Regional Planning Council to develop the Housing Needs Assessment and Housing Gap Analysis, and a landlord survey. This data led to development of individual Housing Action Plans to identify priorities and goals to meet the housing needs of communities in their jurisdiction¹⁵. Seven housing gaps were identified through the Housing Needs Assessment, including the need to:

8. Reduce housing costs for low-income and cost-burdened households.
9. Increase the overall housing supply.
10. Increase the variety of housing sizes and types.
11. Increase senior housing options.
12. Maintain in good condition and improve the existing housing stock.
13. Provide safe, stable options for both renters and homeowners.
14. Increase permanent housing options for people with disabilities and those at risk of or experiencing homelessness.

Since the last Assessment of Fair Housing in 2017, several actions have taken place to allow increased flexibility in zoning for multi-family units and incentives to build affordable units. Some key actions include:

- Olympia, Lacey and Tumwater have implemented initiatives to encourage development of duplexes, triplexes, and other multifamily units in areas traditionally zoned for single-family units.

¹³ [Updating GMA Housing Elements - Washington State Department of Commerce](#)

¹⁴ <https://www.trpc.org/DocumentCenter/View/8067/Housing-Needs-Assessment?bidId=>

¹⁵ https://www.olympiawa.gov/Document_center/Government/Codes,%20Plans%20&%20Standards/Housing-Action-Plan/Housing-Action-Plan.pdf

- Olympia, Lacey and Tumwater have pre-approved a series of building plans for Accessory Dwelling Units (ADUs). Property owners using these plans are exempt from the building plan review and associated fees.
- Tumwater adopted the increased state SEPA thresholds for housing projects in 2017 and 2019.
- Olympia, Lacey, and Tumwater offer a property tax exemption on the valuation of the improvements that create new housing in target areas. There is a 12-year exemption for multi-family projects where at least 20% of the units are rented or sold to low-income families (below 80% of Area Median Income).
- Olympia is currently conducting a program review of the Multi-Family Tax Exemption program to evaluate the effectiveness of creating new residential units, determine whether to expand eligible geographic areas (current areas and expanded areas would be sited along core transit routes), and determine how to increase participation in the 12-year exemption program to build more affordable housing.
- Tumwater expanded their 12-year exemption program in 2019 to include most of the high-density areas served by Intercity Transit.
- Olympia and Lacey may grant an 80% impact fee exemption for projects that are 100% low income. Low-income housing (defined as affordable to households making 80% of Area Median Income or lower) is exempt from School District impact fees. Accessory dwelling units, single-room occupancy, and senior housing are also exempt from School District impact fees.
- Tumwater has adjusted impact fees, connections charges, and permit fees for permanent low-income housing. It also included a fee reduction for smaller homes as a way to encourage a variety of homes available citywide.
- Lacey has also expanded the fee waiver program for non-profits building affordable units to the private sector. Eligible fees to be waived include building, mechanical, plumbing, electrical, plan check, water meter, transportation mitigation. Units must be permanently affordable to households earning below 80% of Area Median Income.
- Olympia offers both density and height bonuses for developers who build affordable units. Olympia allows 1 additional residential unit for each low-income unit¹⁶ provided, up to a 20% bonus. There is also a residential height bonus in the downtown and in the HDC-4 zone, and a density bonus in residential zones for cottages (20%) and townhouses (15% in zones R4-8, R6-12).
- Tumwater has added density or height bonuses in all zone districts that allow multifamily development for permanently affordable units.
- Tumwater has reduced the land use approvals needed for senior housing facilities and increased the size of families of nonrelated people.
- Olympia CDBG subrecipients can submit reimbursement requests for soft costs that are incurred for eligible CDBG activities in the City, including permitting and inspection fees.
- In 2018, Olympia voters passed a sales tax levy to create a municipal Home Fund. The Home Fund provides annual grants dedicated to construction of affordable housing for households

¹⁶ Housing affordable to households with an income not greater than 80% of the median income for Thurston County as determined by the U.S. Department of Housing and Urban Development. Affordable housing should cost no more than 30% of gross household income (including utilities).

making 50% or less of Thurston County Area Median Income. The current focus is on expanding the supply of permanent supportive housing, a specific intervention for people experiencing homelessness.

- In 2022, Tenino City Council passed a sales tax levy to create a municipal Home Fund.
- In 2022, Thurston County Board of County Commissioners approved a 0.1% sales tax increase to create a countywide Home Fund. This new fund will combine with the Olympia Home Fund to expand the community's capacity to build affordable housing.

A subgoal related to zoning and land use code standards was to maximize transportation-linked housing.

- Olympia has reduced parking requirements for residential units for people who are very or extremely low income, when located near transit with regular service.
- Tumwater has reduced parking requirements for ADUs, manufactured home parks, triplexes, fourplexes and multifamily dwellings near transit service.
- In January 2020, Thurston County's public transit agency (Intercity Transit) implemented a Zero Fare demonstration project for five years, making it free to ride Intercity Transit buses.

Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences). Explain how the past goals selected influenced the selection of current goals.

The region fell short in its goals to increase education through publications, trainings, creation of a centralized fair housing link, or a Fair Housing coordinating body. Several jurisdictions have links to fair housing resources on their individual webpages but could improve the resources and information provided. A cross-jurisdictional and nonprofit committee (the Rental Housing Workgroup) hosted a fair housing training conducted by the Fair Housing Center of Washington in January 2022. Since there was difficulty in creating new publications, offering regular trainings, and creating a centralized link, one jurisdiction could take the lead on developing a more comprehensive resource list (with links to online trainings) and share this resource list across jurisdictions to update their online materials.

One of the goals identified in the 2017 AFH was to develop a report and recommendations to ensure more effective rental safety conditions. The City of Olympia has a revolving loan program funded by CDBG that helps rental housing property owners make repairs or improvements in exchange for keeping rents affordable to low-income tenants. Both Thurston County's and Olympia's CDBG programs fund critical home repair programs at Habitat for Humanity of South Puget Sound and Rebuilding Together.

Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.

A countywide Rental Housing Workgroup is working to create a 'Successful Renting' curriculum, which (among other topics) will offer information on fair housing rights and enforcement, to renters in Thurston County. A pilot program is set to be launched in early 2023.

Local jurisdictions (Tumwater and Olympia) are exploring implementation of a rental housing license, permit or registration program, as discussed in the 2017 Assessment of Fair Housing. The City of Lacey already has a rental housing registration program, but the program does not include an inspection component for ensuring safe housing conditions. A registry or permit program will create a centralized directory of rental housing units and will offer an opportunity for jurisdictions to communicate directly

with rental property owners. This program could entail sharing of fair housing resources and information, through either electronic publications or mandatory trainings. Creation of a mandatory inspection program as part of a rental housing permit could help the jurisdictions monitor and regulate housing conditions.

Currently Lacey's rental housing registry program provides incentives for multifamily property owners if they participate in the Crime Prevention Through Environmental Design (CPTED) program by receiving CPTED training.

Some jurisdictions around the nation have implemented Crime Free Multi-Family Housing Programs. These programs may have discriminatory impacts and addition of this program element is not recommended for Tumwater or Olympia as they develop their rental housing permit programs. Crime Free Multi-Family Housing Programs make it easier for a property owner to remove a tenant based on calls to law enforcement, or law enforcement responses to the housing unit. HUD has issued guidance¹⁷ on the potential discriminatory impacts of Crime Free Housing and nuisance ordinances on domestic violence survivors and crime victims. While domestic violence is not a protected class under the Fair Housing Act, both case law and HUD have confirmed that discrimination against domestic violence survivors can be investigated under sex as a protected class (because most domestic violence survivors are women). Policies that have a disparate impact on domestic violence survivors include fines, eviction or denial of future applications due to property damage caused by a perpetrator or law enforcement involvement. HUD's guidance states: 'Nuisance ordinances (and crime-free housing ordinances) are becoming an additional factor that operates to discourage victims from reporting domestic violence and obtaining the emergency police and medical assistance they need.' HUD has also issued guidance¹⁸ on the discriminatory impacts of overly broad criminal history policies (such as blanket 'no felony' policies in rental screening), due to the overrepresentation of people of color in the U.S. criminal justice system. HUD's guidance further states: 'a housing provider who denies housing to persons on the basis of arrests not resulting in conviction cannot prove that the exclusion actually assists in protecting resident safety and/or property.' All housing providers and jurisdictions should review HUD's guidance to ensure their criminal history policies and nuisance ordinances do not violate fair housing laws. A review of Olympia, Lacey and Tumwater nuisance ordinances did not find language that includes calls to law enforcement or law enforcement presence as a nuisance to be remedied.

The Violence Against Women Act (VAWA) Reauthorization of 2022, effective October 1, 2022, includes a new requirement for U.S. Department of Housing and Urban Development (HUD) recipients to support an individual's right to seek law enforcement or emergency assistance. The law requires Community Development Block Grant (CDBG) recipients to:

- Report on the existence of laws or policies they or their subgrantees (or state grant recipients) adopted that impose penalties based on requests for law enforcement or emergency assistance or based on criminal activity that occurred at a covered property.
- Certify that they and their subgrantees are in compliance or describe the steps they and their subgrantees must take to comply within 180 days of the report to HUD.

¹⁷ <https://archives.hud.gov/news/2016/pr16-134-FinalNuisanceOrdGdnce.pdf>

¹⁸ https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF

Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

(Reserved for completion at end of public comment period and identification of goals)

DRAFT

V. Fair Housing Analysis

A. Demographic Summary

Describe demographic patterns in the jurisdiction and region, and describe trends over time.

According to American Community Survey 5-year estimates from 2016-2020, Thurston County had 284,698 total residents. About half of the population resides in Bucoda, Lacey, Olympia, Rainier, Tenino, Tumwater or Yelm, while the remainder of the population lives in unincorporated Thurston County. The City of Olympia has 52,290 total residents. Generally, Thurston County’s population is becoming more racially and ethnically diverse, with a higher proportion of residents born outside the U.S. and who speak languages other than English. Thurston County’s population is aging and there are fewer children/youth under age 18.

Race & Ethnicity

Thurston County’s total population has increased about 17% since 2010. Olympia’s total population has increased by about 14% since 2010. The largest growth has occurred among Hispanic/Latinx individuals and individuals of two or more races. In Thurston County (and Olympia), the population of Hispanic/Latinx individuals has increased by nearly one third since 2010. In Thurston County (and Olympia), the population of people of two or more races has increased by about 80% since 2010. There was a more significant increase in the Asian population in Olympia (1.6% increase) versus Thurston County (.4% increase) from 2010 to 2020. Generally, Olympia’s white population decreased at a higher rate than Thurston County between 2010 and 2020, while its proportion of residents of color increased. Both jurisdictions have populations that are about 80% white and 20% people of color.

Race and Ethnicity of Thurston County and Olympia, 2010 and 2020

Year	Thurston		Olympia	
	2020	2010	2020	2010
TOTAL POPULATION	284,698	243,563	52,290	45,708
White	79.5%	83.4%	80.1%	85.7%
Black or African American	3.0%	2.8%	2.8%	2.3%
American Indian and Alaska Native	1.2%	1.4%	1.0%	1.0%
Asian	5.7%	5.3%	7.6%	6.0%
• <i>Indian</i>	.3%	.3%	.5%	.3%
• <i>Chinese</i>	.6%	.6%	1.0%	1.4%
• <i>Filipino</i>	1.3%	1.2%	1.2%	.6%
• <i>Japanese</i>	.3%	.4%	.3%	.4%
• <i>Korean</i>	1.1%	.9%	1.1%	.6%
• <i>Vietnamese</i>	1.0%	1.2%	2.3%	1.9%
• <i>Other Asian</i>	1.1%	.7%	1.3%	.7%
Native Hawaiian and Other Pacific Islander	.9%	.7%	.7%	.1%
• <i>Native Hawaiian</i>	.2%	.1%	.1%	0%
• <i>Chamorro</i>	.3%	.2%	.3%	0%
• <i>Samoan</i>	.2%	.2%	.1%	0%
• <i>Other Pacific Islander</i>	.2%	.2%	.2%	.1%

Two or more races	7.8%	4.4%	6.4%	3.5%
Hispanic or Latino (of any race)	9.3%	6.6%	9.9%	5.7%
• Mexican	5.9%	4.4%	5.1%	3.6%
• Puerto Rican	.9%	.7%	.7%	.3%
• Cuban	.1%	.2%	.2%	.3%
• Other Hispanic or Latino	2.3%	1.4%	3.9%	1.5%

Source: ACS 2016-2020, ACS 2006-2010 5-year estimates

National Origin

Between 2010 and 2020, the City of Olympia experienced higher growth of residents born outside the United States than Thurston County as a whole (approximately 3% growth in Olympia compared to 1.2% growth countywide). Most Thurston County residents who were born outside the United States were born in: Mexico, Vietnam, Korea, Philippines, China, and Germany.

National Origin in Thurston County and Olympia, 2010 and 2020

Year	Thurston County		Olympia	
	2020	2010	2020	2010
NATIONAL ORIGIN				
Born in U.S., U.S. Island areas, or born abroad to American parent(s)	91.7%	92.9%	90%	92.9%
Foreign born	8.3%	7.1%	10%	7.1%
Place of birth for foreign born population (in rank order from 1-highest to 10-lowest)	10 most common countries of birth - # foreign born residents	10 most common countries of birth - # foreign born residents	10 most common countries of birth - # foreign born residents	10 most common countries of birth - # foreign born residents
1	Mexico - 3,831	Mexico - 2,306	Vietnam - 924	Vietnam - 618
2	Vietnam - 2,440	Vietnam - 2,085	Mexico - 539	China - 433
3	Philippines - 2,400	Korea - 1,747	Korea - 530	Korea - 286
4	Korea - 2,379	Philippines - 1,560	Thailand - 338	Mexico - 241
5	Germany - 1,648	Germany - 1,446	Honduras - 307	Philippines - 231
6	China - 906	Canada - 1,329	Germany - 286	Canada - 174
7	Canada - 904	China - 747	Philippines - 261	India - 128
8	Thailand - 655	India - 472	China - 223	Colombia - 126
9	Cambodia - 634	Japan - 443	Peru - 172	Thailand - 95
10	India - 475	Cambodia - 367	Canada - 135	Germany - 90

Source: ACS 2006-2010 5-year estimates, ACS 2016-2020 5-year estimates

Language Proficiency

In Thurston County, the ten most commonly spoken languages other than English are (in order where number one is most commonly spoken):

1. Spanish

2. Other Asian and Pacific Island languages
3. German or other West Germanic languages
4. Vietnamese
5. Korean
6. Tagalog (including Filipino)
7. Other Indo-European languages
8. Chinese (including Mandarin, Cantonese)
9. French, Haitian, or Cajun
10. Russian, Polish, or other Slavic languages

In Olympia, the ten most commonly spoken languages other than English are (in order where number one is most commonly spoken):

1. Spanish
2. Vietnamese
3. Other Asian and Pacific Island languages
4. Korean
5. Other Indo-European languages
6. Russian, Polish, or other Slavic languages
7. German or other West Germanic languages
8. Chinese (including Mandarin, Cantonese)
9. Tagalog (including Filipino)
10. French, Haitian or Cajun

Language Spoken at Home by Location in Thurston County

	Bucoda	Lacey	Olympia	Rainier	Tenino	Tumwater	Yelm	Thurston County	Chehalis	Nisqually
English Only	549	39,170	42,335	2,278	1,493	20,791	7,760	237,949	526	552
Spanish	3	2,837	2,142	79	68	675	188	11,213	30	0
French, Haitian, or Cajun	2	129	289	3	0	54	11	845	0	0
German or other West Germanic languages	0	866	393	9	0	142	31	2,923	0	5
Russian, Polish, or other Slavic languages	0	117	400	3	0	30	0	840	2	0
Other Indo-European languages	0	261	445	3	0	12	0	1,630	0	0
Korean	0	1,100	515	10	12	44	21	2,439	0	6
Chinese (incl.	0	182	354	0	0	51	0	1,343	0	0

Mandarin, Cantonese)										
Vietnamese	0	996	1,023	0	0	182	0	2,570	0	0
Tagalog (incl. Filipino)	0	956	296	0	0	7	0	2,162	0	1
Other Asian and Pacific Island languages	0	633	937	0	0	64	115	3,441	11	2
Arabic	0	87	10	0	0	85	0	368	0	0
Other and unspecified languages	0	111	97	13	2	31	12	493	15	4
Total Population Age 5 Years and Older	554	47,445	49,236	2,398	1,575	22,168	8,138	268,216	584	570

Source: TRPC (ACS 5-Year Estimates 2016-2020)

From 2010 to 2020, there was a nearly 3% increase in the number of Olympia residents who speak languages other than English at home, while there was only a 1.3% increase countywide. Olympia residents who speak Asian or Pacific Islander languages at home were most likely to indicate that they have limited English proficiency. Around 3.5% of individuals who speak Asian or Pacific Islander languages at home in Olympia speak English less than ‘very well.’ While a higher proportion of residents in Olympia speak Asian or Pacific Islander languages (6.3%) than Spanish (4.4%) at home, the distribution of the two language groups countywide is much more evenly split (4.5% compared to 4.2%).

Year	Thurston County		Olympia	
	2020	2010	2020	2010
Language Spoken at Home and Limited English Proficiency				
English only	88.7%	90%	86%	89.8%
Spanish (of those who speak Spanish at home, % that speak English less than “very well”)	4.2% (1.3%)	3.6% (1.1%)	4.4% (1.2%)	3.2% (1%)
Other Indo-European languages (of those who speak other Indo-European languages at home, % that speak English less than “very well”)	2.3% (.4%)	2% (.3%)	3.1% (.6%)	1.5% (.3%)
Asian and Pacific Islander languages (of those who speak Asian and Pacific	4.5% (2.2%)	4.1% (2%)	6.3% (3.5%)	5.1% (3.1%)

<i>Islander languages at home, % that speak English less than "very well"</i>				
Other languages (of those who speak other languages at home, % that speak English less than "very well")	.3% (.1%)	.3% (0%)	.2% (.2%)	.3% (0%)

Source: ACS 2006-2010 5-year estimates, ACS 2016-2020 5-year estimates¹⁹

The table below shows linguistic isolation in Thurston County by language group. According to the Thurston Regional Planning Council, a "linguistically isolated household" is one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and over have at least some difficulty with English. As evidenced in the table below, households that speak Asian and Pacific Island languages experience the greatest linguistic isolation.

Household Language and Linguistic Isolation, Thurston County				
Language Spoken at Home	2000	2006-2010 Average	2011-2015 Average	2016-2020 Average
English only	71,610	85,214	88,676	96,945
Spanish	3,210	5,001	5,213	4,801
- Linguistically isolated	360	598	859	982
- Not linguistically isolated	2,850	4,403	4,354	3,819
Other Indo-European languages	3,339	3,235	2,972	3,400
- Linguistically isolated	212	204	73	0
- Not linguistically isolated	3,127	3,031	2,899	3,400
Asian and Pacific Island languages	3,288	4,669	5,359	6,943
- Linguistically isolated	760	1,035	1,246	1,416
- Not linguistically isolated	2,528	3,634	4,113	5,527
Other languages	219	372	411	820
- Linguistically isolated	17	36	77	327
- Not linguistically isolated	202	336	334	493

¹⁹ <https://www.trpc.org/450/Language-Spoken-at-Home>

Total Households	81,666	98,491	102,631	112,909
Percent Linguistically Isolated	1.7%	1.9%	2.2%	2.4%

Source: ACS 2006-2010 5-year estimates, ACS 2016-2020 5-year estimates²⁰

Gender & Age

The population identifying as male has decreased slightly countywide and in Olympia over the past ten years. Thurston County's population is aging. From 2010 to 2020, there was 5% growth in the population over age 65 and 2% decrease in the population under age 18.

Sex and Age, 2010 and 2020

Year	Thurston County		Olympia	
	2020	2010	2020	2010
SEX				
Male	48.9%	48.7%	48.7%	47.6%
Female	51.1%	51.3%	51.3%	52.4%
AGE				
Under 18 years	21.4%	23.2%	18%	20.5%
19-64 years old	61.3%	64.3%	63.6%	66.7%
65 years and over	17.3%	12.5%	18.4%	12.8%
Median Age (years)	39.1	38.3	37.7	36.7

Source: ACS 2016-2020 and 2006-2010 5-Year Estimates²¹ (Table DP05)

The U.S. Census and American Community Survey do not include transgender or nonbinary gender categories or questions. According to the UCLA Williams Institute²², the transgender adult population in Washington State is about 33,300 or 0.56% of the adult population. Of those adults, transgender young adults (age 18-24) comprise just over 2% of the overall population. The Williams Institute estimates that transgender youth under age 18 make up 1.1% of the overall population under age 18.

Disability

Nearly 14% of the general population has a disability in Thurston County. The table below shows individuals who have a disability by age range in Thurston County and Olympia.²³ Nearly half of Thurston County residents over age 75 have a disability, although the proportion of residents age 75+ with a disability decreased from 2015-2020.

²⁰ <https://www.trpc.org/450/Language-Spoken-at-Home>

²¹ <https://data.census.gov/cedsci/table?q=16000000US5351300&y=2020&d=ACS%205-Year%20Estimates%20Data%20Profiles&tid=ACSDP5Y2020.DP05>

²² <https://williamsinstitute.law.ucla.edu/subpopulations/transgender-people/>

²³ https://data.census.gov/cedsci/table?q=S1810&g=05000000US53067_16000000US5351300&d=ACS%205-Year%20Estimates%20Subject%20Tables&tid=ACSST5Y2020.S1810

Disability by Age, 2015 and 2020

AGE	Thurston County			Olympia		
	2020 individuals with a disability	2020 % of individuals with a disability	% change from 2015-2020	2020 individuals with a disability	2020 % of individuals with a disability	% change from 2015-2020
Under 5 years	186	1.1%	0.4%	42	1.4%	0.7%
5-17 years	2,325	5.2%	1.8%	280	4.4%	1.6%
18-34 years	5,331	8.7%	1.7%	1,314	9.4%	1.5%
35-64 years	14,273	13.3%	0.5%	2,758	15.1%	3.0%
65-74 years	7,247	23.8%	-1.1%	1,307	24.0%	2.0%
75 years and over	8,541	47.5%	-4.2%	1,684	43.9%	-10.0%

Source: ACS 2016-2020 5-year estimates (Table S1810)²⁴

Cognitive and ambulatory disabilities are the most common disabilities experienced by Thurston County residents. About 4.2% of Thurston County residents have hearing difficulty, 2.4% have a vision difficulty, 5.2% have a cognitive difficulty, 7% have ambulatory difficulty, 2.5% have self-care difficulty, and 3.8% have difficulty living independently. There were very small increases in the proportion of residents with disabilities related to hearing, vision, cognition, self-care, and independent living. There was a slightly larger increase in percentage of Olympia residents with a mobility-related disability (1.1% increase from 2015 to 2020).

Disability by Type, 2015 and 2020

DISABILITY TYPE BY DETAILED AGE	Thurston County		Olympia	
	2020 % with a disability	% change from 2015-2020	2020 % with a disability	% change from 2015-2020
With a hearing difficulty	4.2%	0.1%	3.6%	0%
With a vision difficulty	2.4%	0.4%	2.4%	0.6%
With a cognitive difficulty	5.2%	0.3%	6.4%	0.7%
With an ambulatory difficulty	7.0%	0.1%	7.2%	1.1%
With a self-care difficulty	2.5%	0%	2.9%	0.4%
With an independent living difficulty	5.5%	0.1%	5.8%	0.2%

Source: ACS 2016-2020 5-year estimates (Table S1810)²⁵

²⁴ https://data.census.gov/cedsci/table?q=S1810&g=0500000US53067_1600000US5351300&d=ACS%205-Year%20Estimates%20Subject%20Tables&tid=ACSST5Y2020.S1810

²⁵ https://data.census.gov/cedsci/table?q=S1810&g=0500000US53067_1600000US5351300&d=ACS%205-Year%20Estimates%20Subject%20Tables&tid=ACSST5Y2020.S1810

Family Status

There was a decrease in households with children from 2015-2020. There are fewer families with children in Olympia than Thurston County as a whole, and the number of families with children has decreased more significantly over time in Olympia. Among households with children, family sizes have increased slightly in both Olympia and Thurston County.

Households with Children, 2010 and 2020

	Thurston County		Olympia	
	2020	2010	2020	2010
Households with one or more people under 18 years	30.4%	32.7%	24.1%	28.8%
Average family size	2.99	2.93	2.83	2.79

Source: ACS 2016-2020 and 2006-2010 5-Year Estimates (Table DP02)²⁶

From 2015 to 2020, there was a slight increase in number of children in Thurston County, but a decrease in the City of Olympia. In both Thurston County and Olympia, there was an increase in the number of children living in a married-couple family household. In Thurston County, there was a steep decrease in children living with a single male parent, while in Olympia there was a steep increase in children living with a single male parent from 2015 to 2020. There was a significant decrease in the number of children living in single female parent households in Olympia from 2015 to 2020, while there was almost no change countywide.

Household characteristics of families with children, 2020

	Thurston County				Olympia			
	TOTAL	In married-couple family household	In male-headed household, no spouse present	In female-headed household, no spouse present	TOTAL	In married-couple family household	In male-headed household, no spouse present	In female-headed household, no spouse present
Children under 18	60,839	43,433	4,266	12,794	9,389	6,237	829	2,255
Children under 18 (percent of total)	100%	71.3%	7%	21%	100%	66.4%	8.8%	24%
% change from 2015 to 2020	4.5%	8.3%	-17.2%	-0.4%	-0.6%	3.5%	31.0%	-25.9%

Source: ACS 2016-2020 5-Year Estimates, Table S0901

²⁶https://data.census.gov/cedsci/table?t=Native%20and%20Foreign%20Born&g=0500000US53067_1600000US5351300&y=2020&d=ACS%205-Year%20Estimates%20Data%20Profiles&tid=ACSDP5Y2020.DP02

Single parent-headed households are more likely have income below the federal poverty level and rent rather than own their homes. While only about 6% of children in married couple households live below the federal poverty level, over 20% of children in single parent households live below the federal poverty level. These rates are higher in the City of Olympia. Poverty rates increased between 2015 and 2020 for single male-heads of households in both Thurston County and Olympia, while poverty rates decreased during the same timeframe for female heads of households. Only about 18% of single female-headed households with children own their homes in Olympia. Countywide, ownership rates for families with children increased in all households but single female-headed households. The number of households with children renting rose for all categories except married families in the City of Olympia.

Economic characteristics of families with children, 2020

	Thurston County				Olympia			
	TOTAL	In married-couple family household	In male-headed household, no spouse present	In female-headed household, no spouse present	TOTAL	In married-couple family household	In male-headed household, no spouse present	In female-headed household, no spouse present
Income in the past 12 months below poverty level	11.4%	5.8%	23.9%	26.1%	15%	6.5%	27.2%	33.4%
% change from 2015 to 2020 (Income below poverty level)	-0.5%	-2.2%	7.6%	-15.9%	-6.6%	-3.9%	0.9%	-11.2%
In owner-occupied housing units	63.8%	73.4%	48.2%	37.6%	53.9%	69%	37.5%	18.3%
In renter-occupied housing units	36.2%	26.6%	51.8%	62.4%	46.1%	31%	62.5%	81.7%
% change from 2015-2020 (owner occupied units)	2.5%	4.1%	4.7%	-6.3%	-0.9%	1.1%	-7.1%	-11.1%

Source: ACS 2016-2020 5-Year Estimates, Table S0901

While Thurston County’s general population is nearly 80% white, around 72% of children under age 18 are white. The proportion of white children in both Thurston County and Olympia decreased from 2015-2020, though the decrease was more significant in Olympia. There is a much higher proportion of children with Asian heritage in Olympia (9.5%) compared to Thurston County as a whole (5%). Nearly 19% of children in Olympia and 15% of children countywide identify as Hispanic/Latinx. This reflects the growing diversity in Thurston County and could be used to forecast future demographic changes.

Race and Ethnicity of Children, 2015 and 2020

RACE	Thurston County		Olympia	
	2020	% change from 2015-2020	2020	% change from 2015-2020
White	72%	-4.0%	71%	-11.2%
Black or African American	2.8%	0.1%	2.8%	1.4%
American Indian and Alaska Native	1.3%	-0.7%	1%	0.8%
Asian	5%	-1.2%	9.5%	2.0%
Native Hawaiian and Other Pacific Islander	.8%	-0.4%	1.3%	1.2%
Some other race	2.3%	0.7%	2.8%	1.1%
Two or more races	15.7%	5.5%	11.6%	4.7%
Ethnicity				
Hispanic or Latino origin (of any race)	15.1%	1.7%	18.7%	6.0%

Source: ACS 2016-2020 and 2006-2010 5-Year Estimates (Table S0901)

B. General Issues

i. Segregation/Integration

1. Analysis

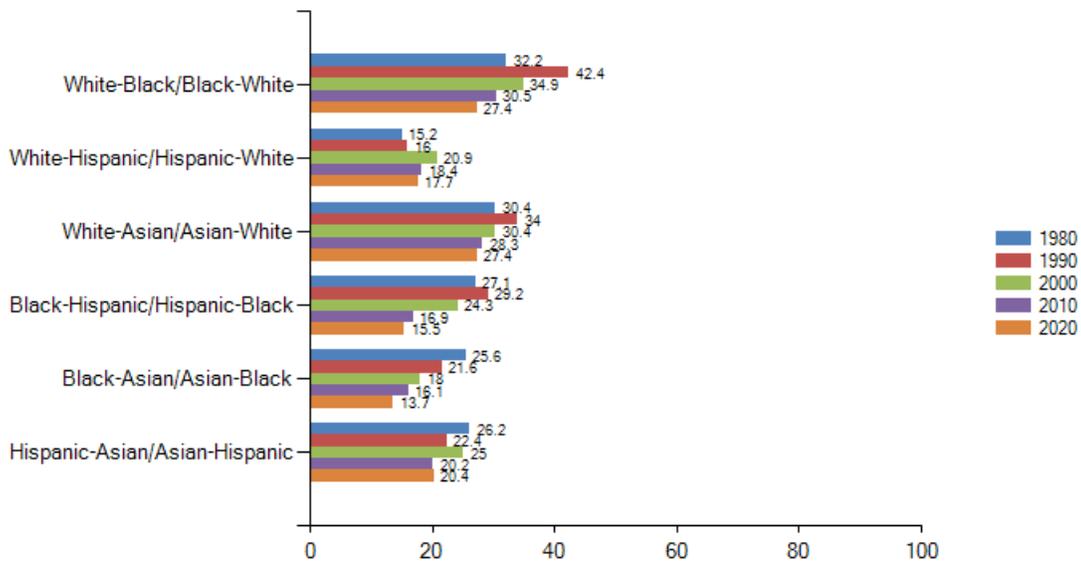
a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

HUD uses a Dissimilarity Index to identify segregation or the degree of integration in a census tract. The **Dissimilarity Index** measures whether one racial or ethnic group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. Values range from 0 to 100. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low.²⁷

²⁷ Explanation and tables from Brown University [US2020 \(brown.edu\)](https://brown.edu/research/US2020)

The table below shows Olympia-Lacey-Tumwater Metropolitan Area Dissimilarity over time. A higher value means that there is more segregation between groups. As evidenced in the table below, segregation between white and black residents was highest of any groups in 1990 with a score of 42.4 (considered a moderate level of segregation) but has been steadily decreasing since 1990. The table below shows integration has increased between most groups measured over time since 1990. Segregation between white and Hispanic/Latinx households increased in 2000 and have been decreasing over time, but segregation levels are still higher in 2020 than they were in 1980. There was also a slight jump in segregation levels in 2000 between Hispanic/Latinx and Asian households. Segregation remains highest (with a score of 27.4) between white and Black, and between white and Asian households. By the measures in this index, segregation is fairly low across racial and ethnic groups in the region.

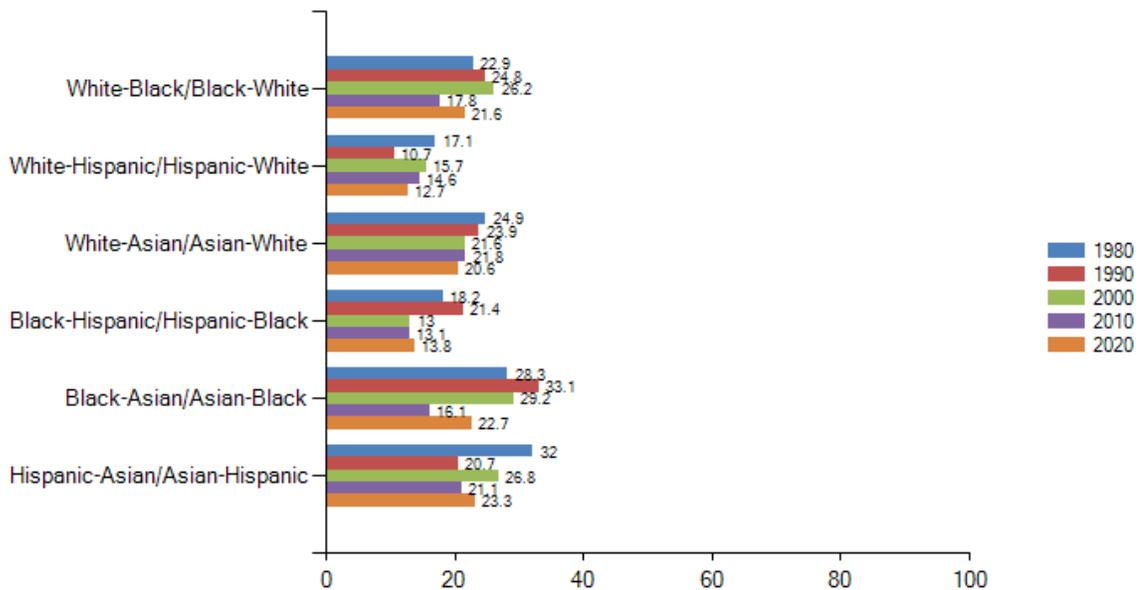
Olympia-Lacey-Tumwater Metropolitan Area Dissimilarity Index²⁸



The Dissimilarity Index for the City of Olympia is shown in the table below. Between 2010 and 2020, segregation increased between white and Black households, Black and Asian households, and Hispanic/Latinx and Asian households in Olympia. Generally, the dissimilarity values are lower (meaning there is less segregation) between white households and households of color in Olympia than the entire Metropolitan area. However, there are greater levels of segregation between Black and Asian households and between Hispanic and Asian households in Olympia than countywide.

²⁸ <https://s4.ad.brown.edu/projects/diversity/segregation2020/msa.aspx?metroid=36500>

Olympia Dissimilarity Index²⁹



b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

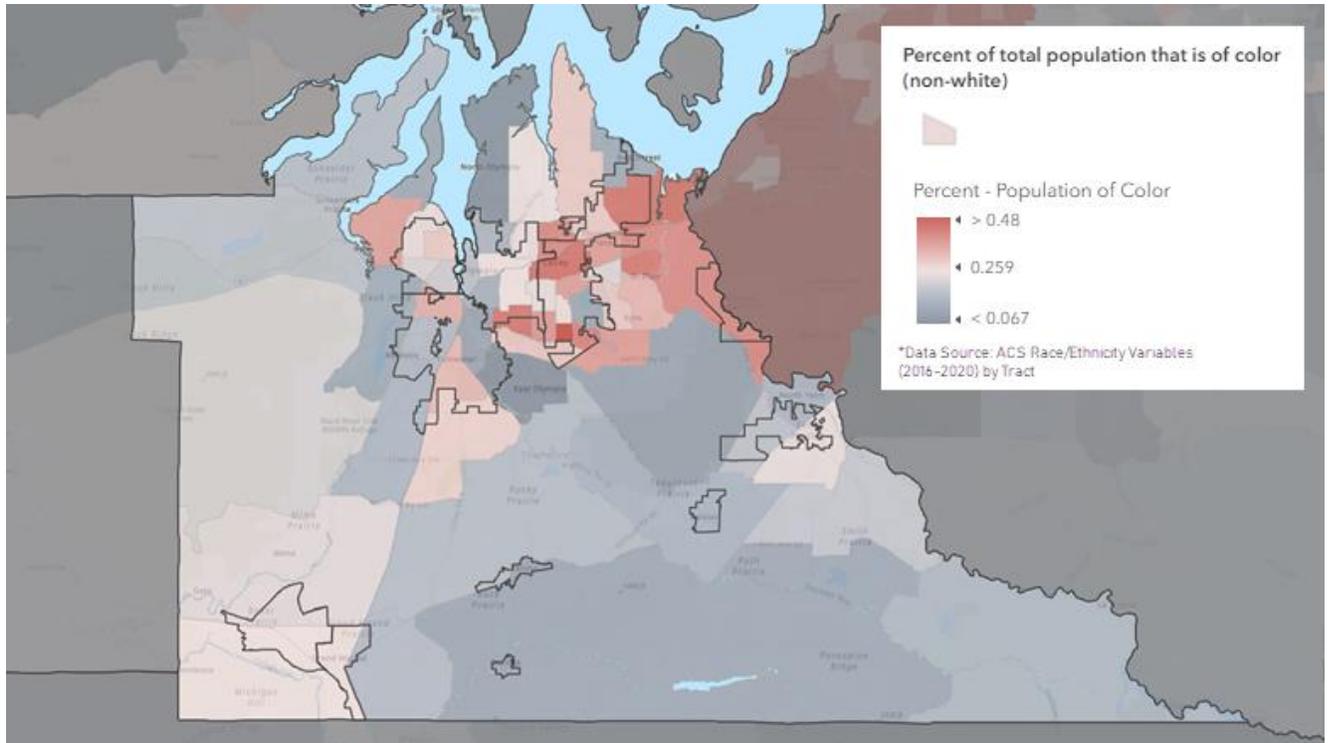
The predominant racial/ethnic group throughout Thurston County is white, non-Hispanic. About 80% of Thurston County’s population identifies as white, non-Hispanic. While the HUD data indicates there is low segregation in Thurston County, there are areas with greater proportion of people of color, people born outside the U.S or with Limited English Proficiency. The sections below will identify census tracts with higher or lower concentrations of particular groups.

The more densely populated urban areas of Thurston County are more diverse and integrated than South Thurston County, with higher concentrations of people of color and people born outside the U.S. in Lacey (especially along Interstate 5) and near Joint Base Lewis-McChord to the east. There are more people of color and people born outside the U.S. along the Yelm Highway corridor (particularly north of Yelm Highway) in southeast Olympia.

²⁹ <https://s4.ad.brown.edu/projects/diversity/segregation2020/msa.aspx?metroid=36500>

Race/Ethnicity

The map below shows people of color by census tract. Red signifies higher percentages of people of color, while gray indicates areas with higher percentages of white residents.



Census Tract 116.22 in south Lacey has the highest percentage of people of color in Thurston County at just over 41% people of color (not including white, Hispanic/Latinx population). This tract contains Rainier Vista Community Park, and is bordered by College Street to the west, Yelm Highway to the south, Ruddell Road to the east and 45th Ave SE to the north.

Census Tract 125.31 in the southeast part of the county (South of Rainier) has the lowest percentage of people of color in Thurston County, at just under 5% (not including white, Hispanic/Latinx population). This tract contains Lake Lawrence and the Skookumchuck Reservoir.

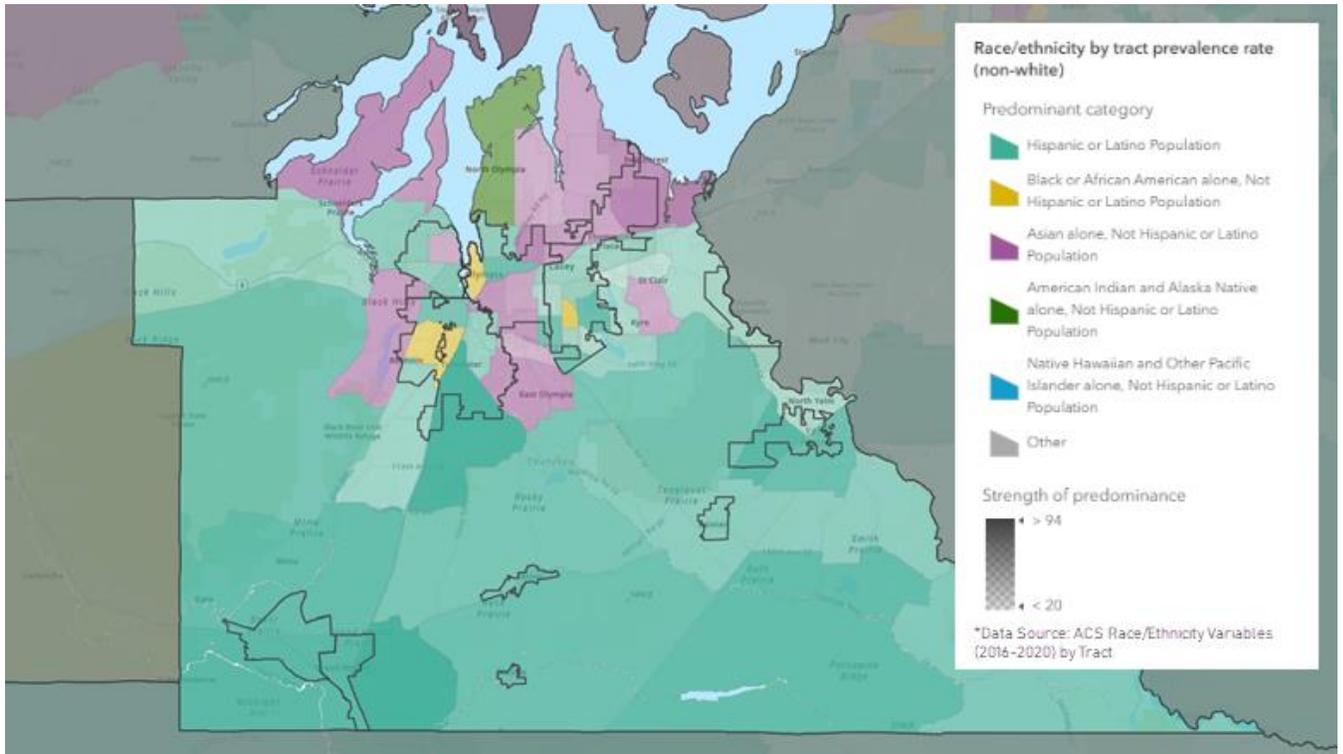
In Olympia city limits, the southeast contains both the highest and lowest populations of people of color, separated by Henderson Boulevard. Census Tract 117.21 is the most diverse tract (around 35% people of color, not including white, Hispanic/Latinx) and is located north of Yelm Highway, encompassing Ward Lake and the Wilderness neighborhood.

Census Tract 108.02 is the least diverse area (11.4% people of color) in Olympia city limits. This tract is on the southeast edge of city limits (majority of the tract is in Tumwater), near the Briggs YMCA (south of Olympia High School).

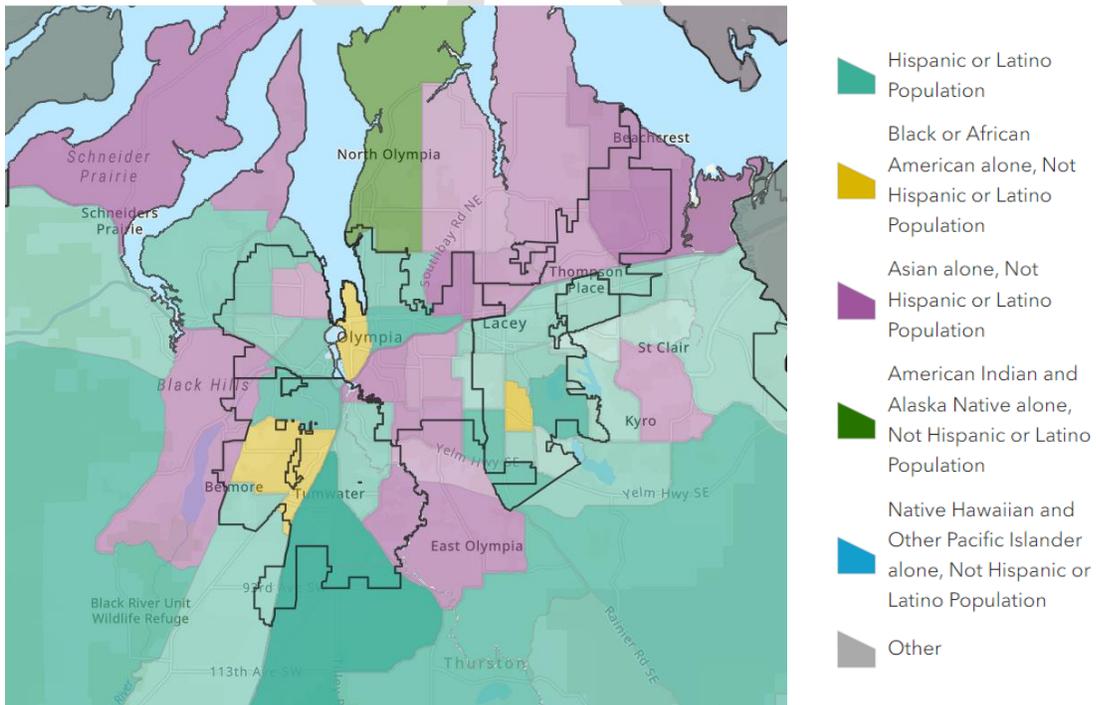
Predominant Race/Ethnicity by Census Tract

The map below shows the predominant race/ethnicity by census tract in Thurston County, excluding white, non-Hispanic individuals. The colors on the map correspond to a racial or ethnic group. The

darker (or more saturated) the color shading, the higher the predominance of that particular racial or ethnic group. This map helps to identify any areas with high concentrations of a particular racial or ethnic group. Note that this map does not include individuals of two or more races.



Predominant Race/Ethnicity (excluding majority white, non-Hispanic individuals)



Overall, Hispanic/Latinx individuals are the most prevalent of all racial/ethnic groups after individuals identifying as white, non-Hispanic. In the South County, Hispanic/Latinx and people of two or more races are the most common racial and ethnic backgrounds among people of color. The highest proportion of Hispanic/Latinx individuals (as a percentage of the overall population) is in Census Tract 108.01 in Tumwater (around the Olympia airport) at 23% of the population.

Asian populations are the next most prevalent group in Thurston County. Census Tract 122.26 has the greatest proportion of Asian individuals (21% of population) as a percentage of the overall population. This tract is located on the eastern border of the county near Hawks Prairie (east of Marvin Road and north of Interstate 5).

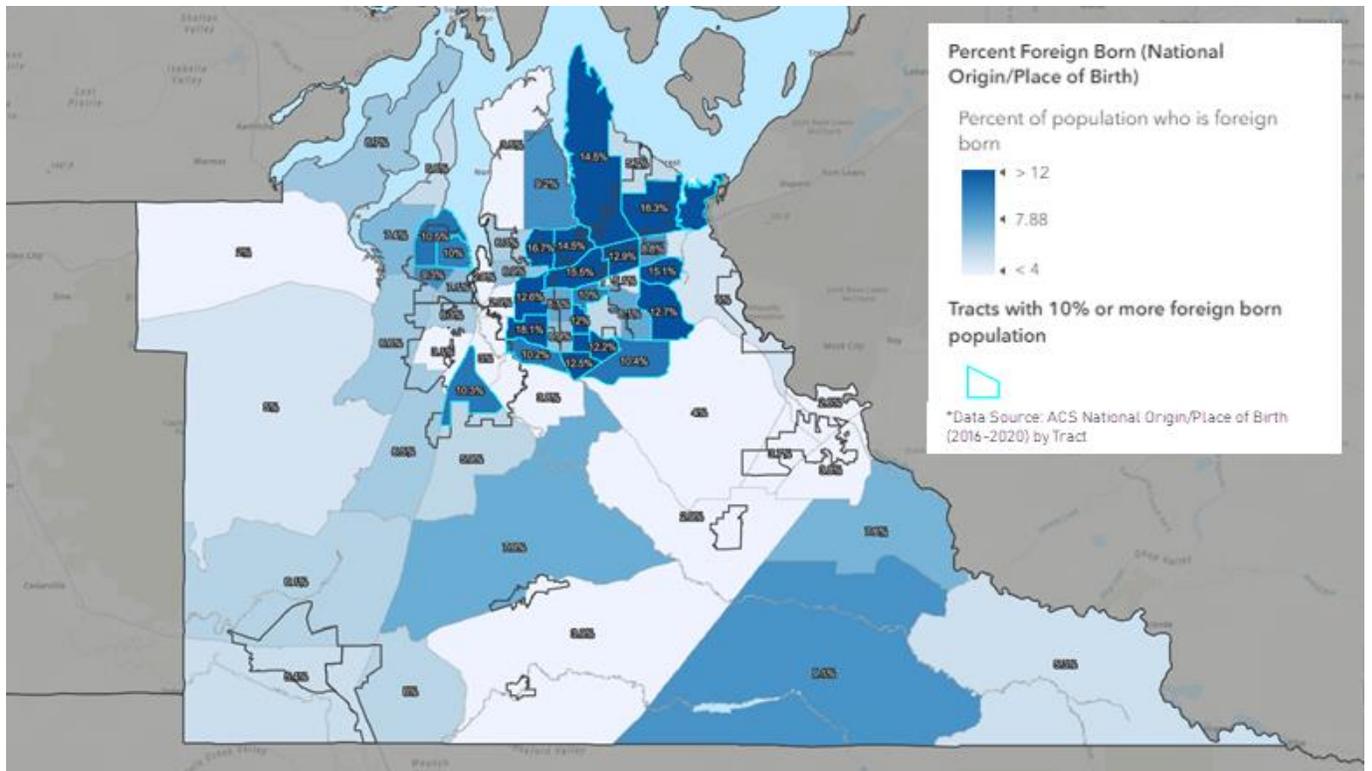
American Indian and Alaska Native populations are most highly concentrated (about 13% of population) on and around the Nisqually reservation in Census Tract 123.20.

Black or African American individuals are most highly concentrated (12.6% of the population) in Lacey near Komachin Middle School and Wonderwood Park in Census Tract 114.21.

The greatest concentration of Native Hawaiian or other Pacific Islander population (9% of population) is in Census Tract 116.22 in south Lacey, just North of the Amtrak train station and South of Timberline High School.

National Origin

The map below shows percentage of the population that was born outside the U.S. Tracts shaded in yellow indicate that over 10% of the population was born outside of the U.S. The map shows that the majority of tracts with high concentration of individuals born outside the U.S. are in the urban areas of the county, with the greatest concentration in east Olympia and Lacey. Areas surrounding Summit Lake (on the western border of the county), Bucoda, Rainier, and Yelm contain the lowest proportion of individuals born outside the U.S. Of the urban areas, downtown Olympia, the South Capitol neighborhood and central Tumwater have the lowest proportion of individuals born outside the U.S.



The tract with the highest proportion of residents born outside the U.S. is located in southeast Olympia (north of Yelm Highway, near Ward Lake and Wildnerness). About 18.1% of people who reside in this tract were born outside the U.S. These residents were born in the following continents:

1. Asia - 72.7%
2. Latin America - 12.1%
3. Europe - 7.1%
4. North America - 5.8 %
5. Africa - 2.3%
6. Oceania - 0.0%

The area around St. Peter’s Hospital in Olympia has the next highest proportion of foreign-born residents, with 16.7% of residents born outside the U.S. These residents were born in the following continents:

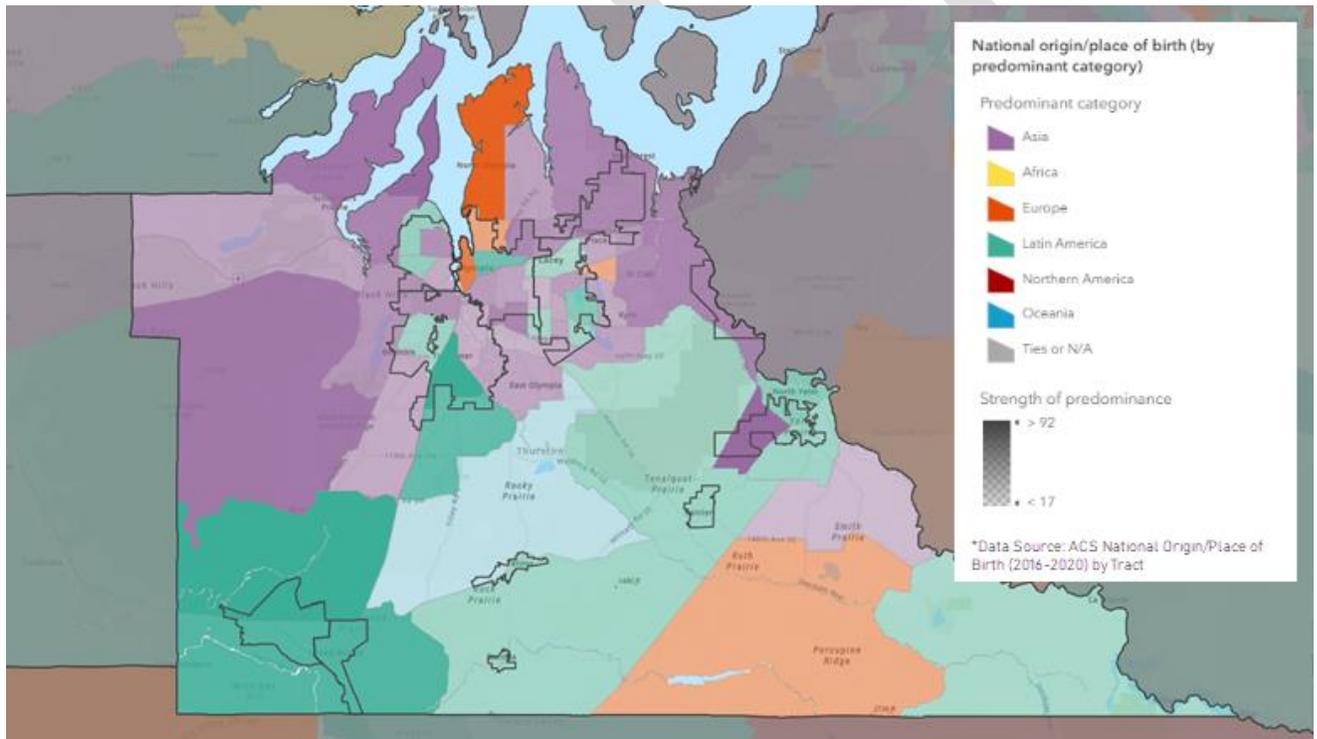
- Asia - 71.7%
- Africa - 11.4%
- Europe - 10.9%
- Latin America - 6.0%
- Oceania - 0.0%
- North America - 0.0 %

Just outside Lacey city limits, in the tract north of I-5 between Marvin Road and Billy Frank Jr. Wildlife Refuge, about 16.3% of individuals were born outside the U.S. Residents were born in the following continents:

- Asia - 71.9%
- Latin America - 11.9%
- Europe - 10.5%
- North America - 5.8 %
- Africa - 0.0%
- Oceania - 0.0%

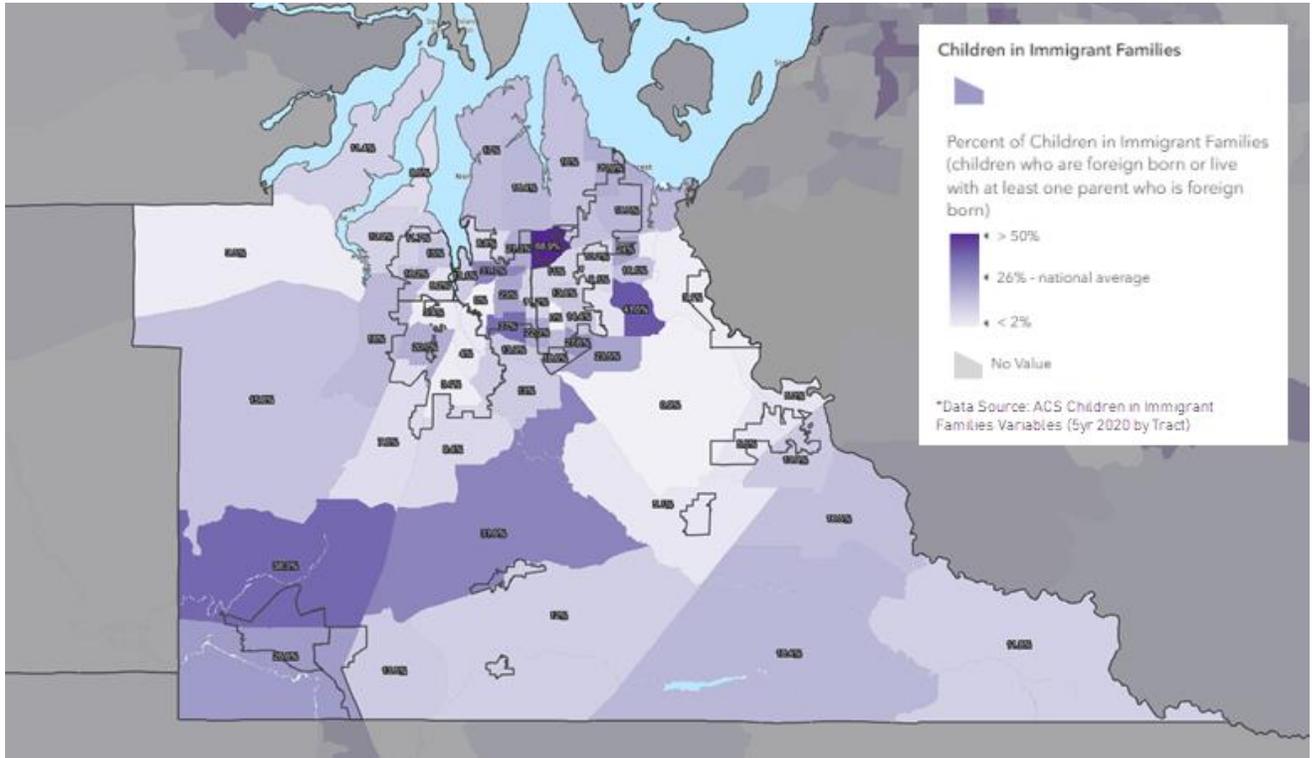
In the South County, the tract with the greatest proportion of individuals born outside the U.S. is south of Rainier, on the border with Lewis County. About 9.1% of individuals in this tract were born outside the U.S. Of those individuals, around 42% were born in Europe and 40% were born in Asia.

The map below shows the predominant populations born outside of the U.S. by color and shading. This helps to identify any concentrations of particular groups.



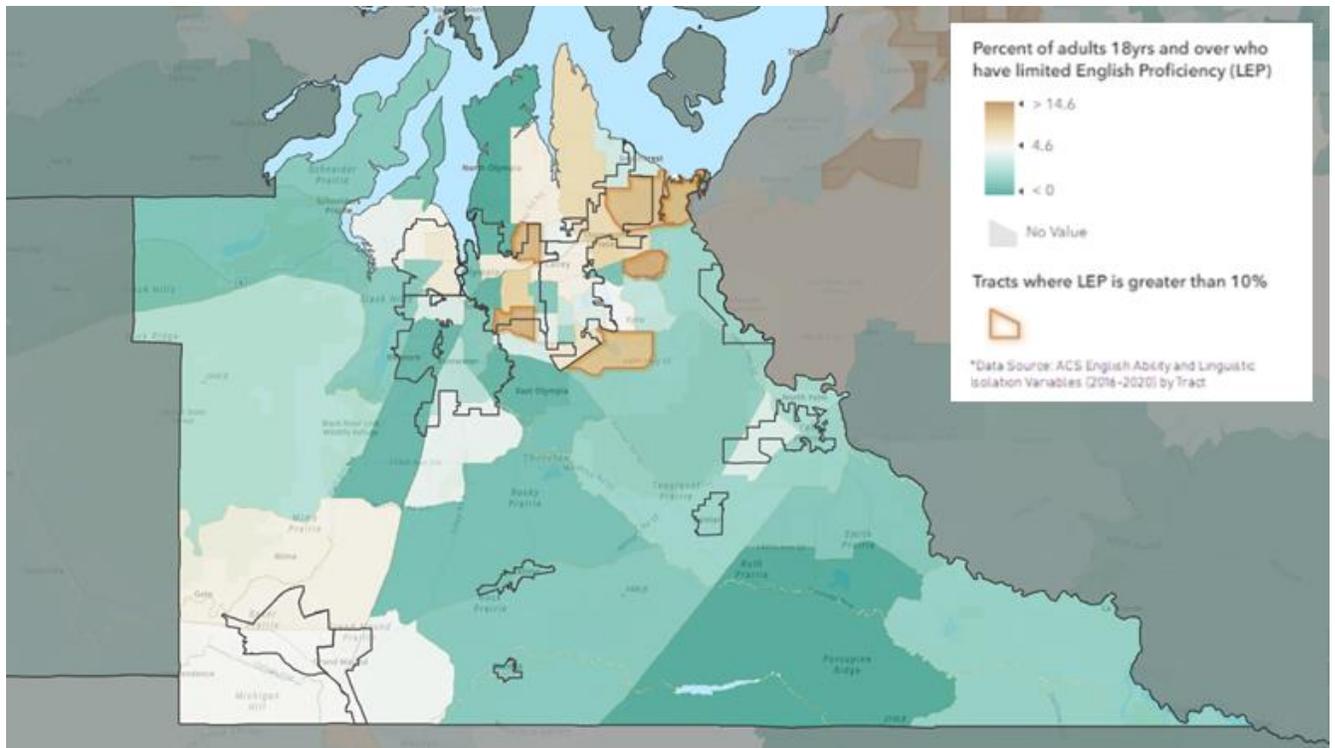
While only about 3.5% of the total population in Boston Harbor was born outside the U.S., 80% of those individuals were born in Europe. In the tract around the Olympia airport in Tumwater, 10.3% of the population was born outside the U.S. and 100% of those individuals were born in Latin America. Of the 5.4% of individuals around Rochester who were born outside the U.S., about 95% were born in Latin America. Only 3.7% of the population in the west side of Yelm was born outside the U.S., however, 100% of those individuals were born in Asia. Of the 5.6% of individuals born outside the U.S. who reside on the Cooper Point peninsula, 100% were born in Asia.

The maps below show children in households where at least one parent was born outside the U.S. Nearly 68% of children in the area north of I-5 in Lacey (around North Thurston High School) have at least one parent born outside the U.S. In Olympia, over 44% of children living in the area around Ward Lake and Wilderness have at least one parent born outside the U.S. In the South County, in the area north of Tenino, around 32% of children have at least one parent born outside the U.S.



Limited English Proficiency

The maps below show populations with Limited English Proficiency (LEP). The purple (darker) shading indicates higher percentages of adults with limited English language ability. The majority of LEP individuals speak an Asian or Pacific Island language.



The highest concentration of LEP adults is in Lacey near the Regional Athletic Complex and south of Steilacoom Road. In this area, approximately 12.7% of adults have limited English ability and the majority speak Asian or Pacific Island languages.

The next highest concentration of LEP adults is in southeast Olympia around Ward Lake and Wilderness (north of Yelm Highway). In this area, approximately 12.0% of adults have limited English ability and the majority speak Asian or Pacific Island languages.

In northeast Olympia near Providence St. Peter Hospital, approximately 11.8% of adults have limited English ability and the majority speak Asian or Pacific Island languages.

In northeast Lacey near the Billy Frank Jr. Nisqually National Wildlife Refuge, approximately 11.2% of adults have limited English ability and the majority speak Asian or Pacific Island languages.

c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time.

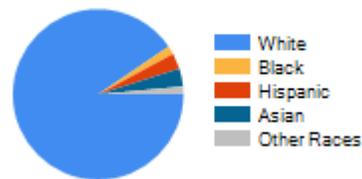
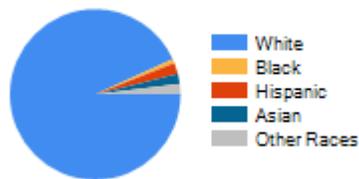
As indicated by the Dissimilarity Index, generally segregation is decreasing over time in Thurston County. The charts below show population change by race and ethnicity between 1980 and 2020. This data was used by Brown University in their Dissimilarity Index analysis.³⁰

³⁰ <https://s4.ad.brown.edu/projects/diversity/segregation2020/msa.aspx?metroid=36500>

	Total Population	Non Hispanic White	Non Hispanic Black	Hispanic	Asian	Other Races
1980	124,264	115,868 93.2%	1,002 0.8%	2,577 2.1%	2,310 1.9%	2,507 2.0%
1990	173,142	156,687 90.5%	2,829 1.6%	5,173 3.0%	5,896 3.4%	2,557 1.5%
2000	218,665	182,994 83.7%	6,258 2.9%	10,163 4.6%	12,976 5.9%	6,274 2.9%
2010	252,264	199,019 78.9%	9,538 3.8%	17,787 7.1%	19,520 7.7%	6,400 2.5%
2020	294,793	207,985 70.6%	14,580 4.9%	29,024 9.8%	28,385 9.6%	14,819 5.0%

1980

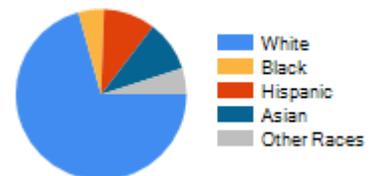
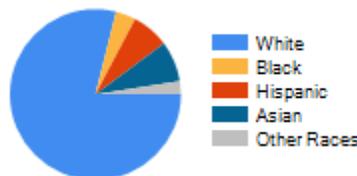
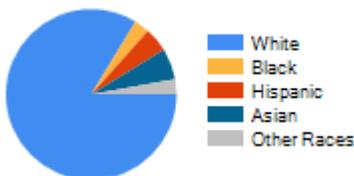
1990



2000

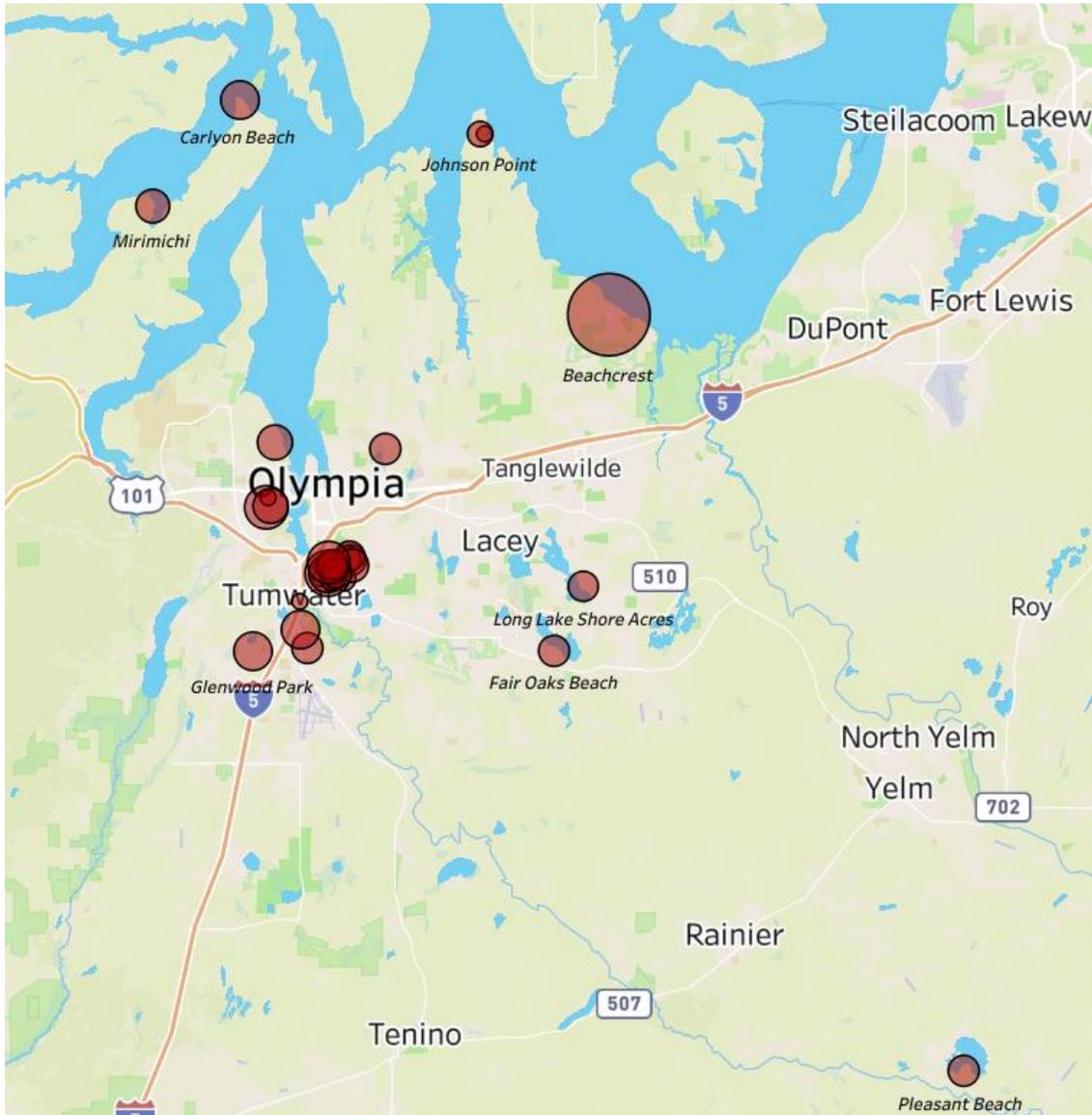
2010

2020



The map below shows subdivisions where restrictive covenants limited which races could purchase or rent property in Thurston County. While these racially restrictive covenants are no longer legally enforceable, there have been lasting impacts on the demographics of these areas. In Dr. Thelma Jackson's book '[Blacks in Thurston County, Washington](#)', several contributors shared stories of real estate agents steering them towards certain areas (Lacey rather than Olympia or Tumwater, and in particular to Tanglewilde in Lacey). Median home values in 2020 in Tanglewilde were about 25% less than median home values in the area around Olympia High School.

Racially restricted subdivisions in Thurston County

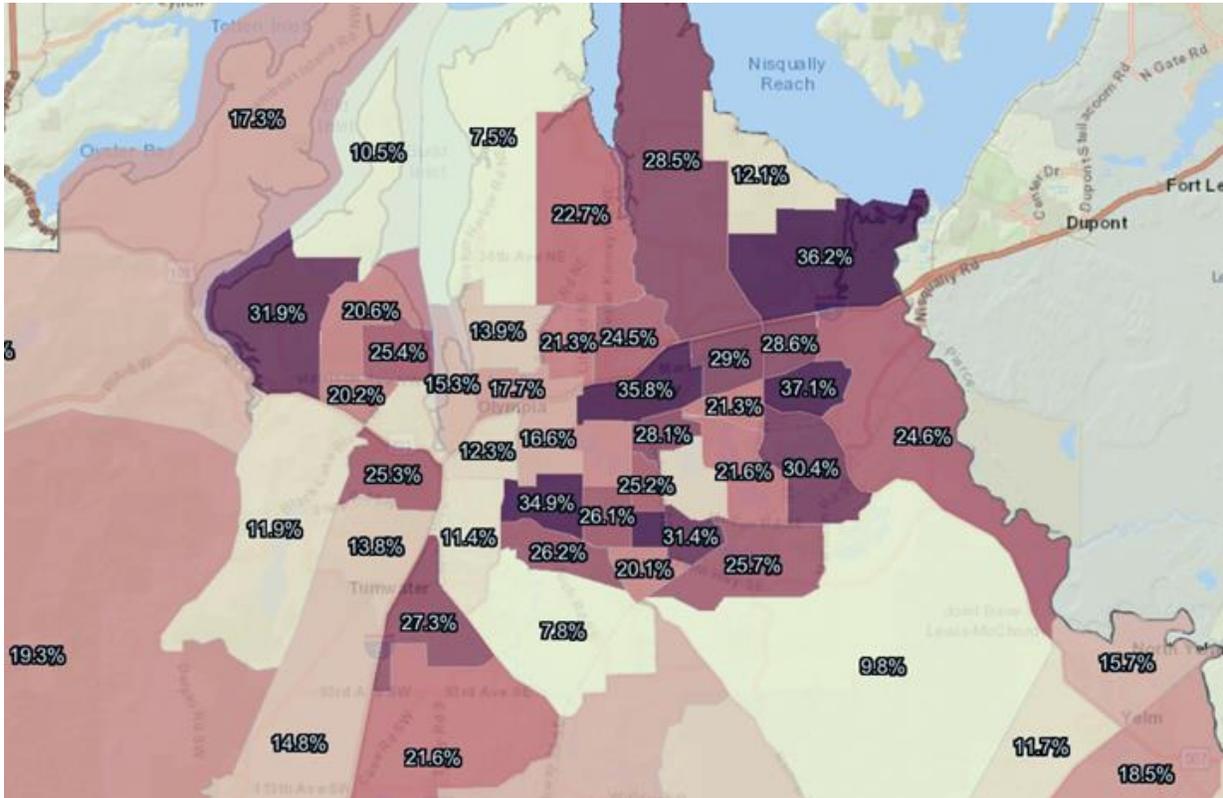


Source: *Racial Restrictive Covenants Project Washington State, Civil Rights and Labor History Consortium, University of Washington*³¹

³¹ https://depts.washington.edu/covenants/county_thurston.shtml (map retrieved February 17, 2023)

From UW webpage: On the map above, do not assume that areas without circles were not restricted. Restrictive covenants were only one of the mechanisms of segregation. Neighborhoods without covenants often practiced racial exclusion by other means. There is a logic to the geography. Areas platted (subdivided) between 1925 and 1948 were most likely to be restricted. Realtors and developers wrote racial exclusions into the initial documents subdividing a future neighborhood. All properties in the subdivision were thus legally restricted. It was more complicated to restrict older areas. Neighborhood associations sometimes organized petition drives and convinced white homeowners to add racial restriction clauses to their properties.

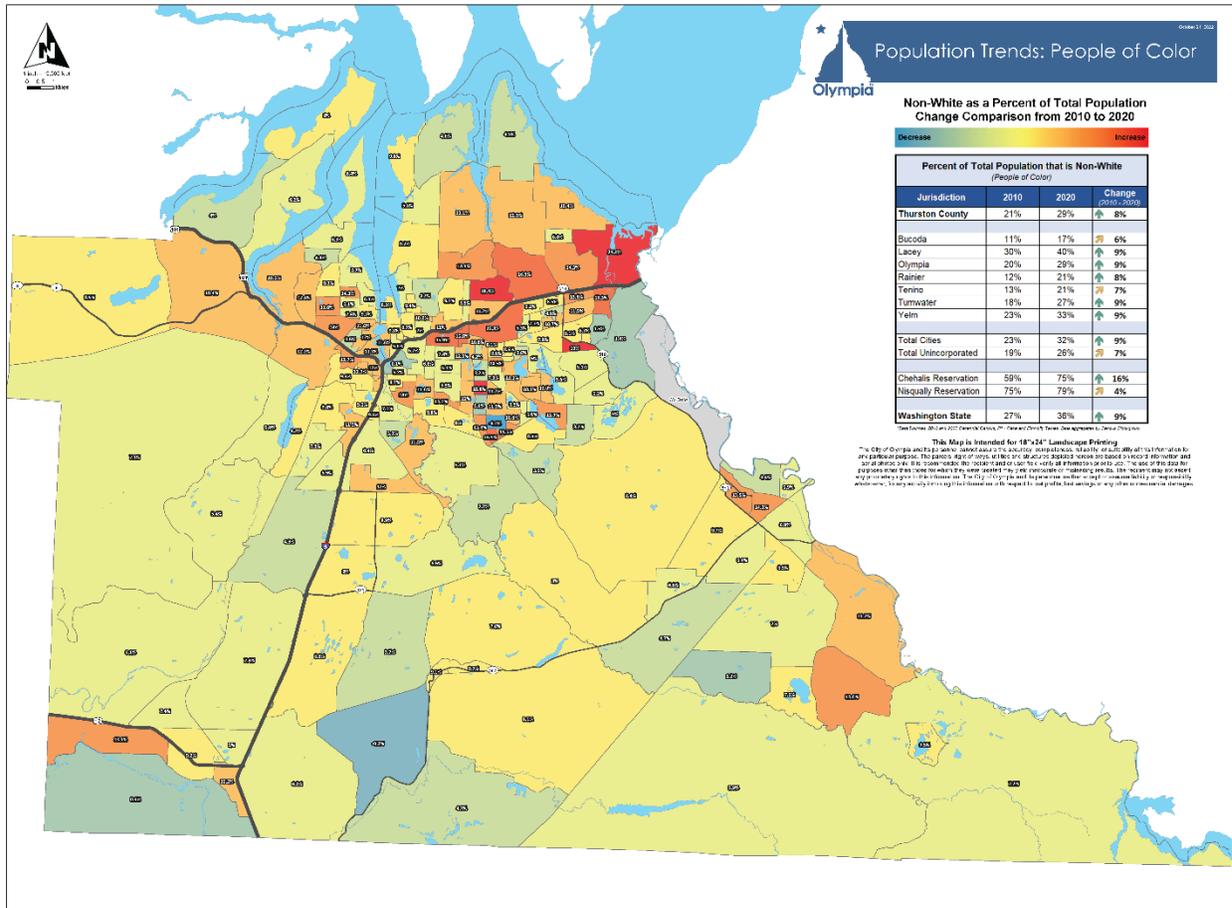
The map below uses American Community Survey data from 2016-2020 to identify census tracts with higher percentages of people of color in the same region as the map above. Darker purple shading indicates higher population of people of color while lighter yellow shading indicates lower population of people of color. White, Hispanic/Latinx individuals are not included in these percentages, but Hispanic/Latinx individuals of other races are included.



The maps indicate that many of the areas with a high percentage of racially restrictive covenants are still predominantly white, compared to other areas. Beachcrest, around Olympia High School, in Tumwater along Capitol Boulevard are a few areas where racially restrictive covenants were present and white residents still comprise close to 90% of the population. Countywide, approximately 80% of the population is white.

We can take a deeper look at patterns of mobility, integration and segregation across census tracts by comparing maps that show current people of color population and percent increase of people of color population over time. Areas with higher people of color populations that experienced low to moderate growth of people of color population over 10 years continue to be accessible to households of color. This trend may indicate that these areas have been more segregated consistently over time, resulting in higher concentrations of people of color. If there are more dramatic decreases in people of color over time, it may be a sign that people of color are being displaced from the area. Areas with high growth of people of color populations but low overall diversity are integrating over time. Areas with low growth of people of color population and low overall diversity indicate that these areas are more segregated and not accessible to people of color. Areas with very low growth or decrease in populations of color may indicate that people of color are experiencing displacement. This is more apparent in tracts with lower overall population (for example, if one household moves out of a tract with only 20 households).

The map below shows percentage change in the population of people of color from 2010 to 2020. Red shading indicates a higher percentage increase in the population of people of color. Blue shading indicates a percentage decrease of people of color.



Overall, Thurston County’s population is becoming more diverse, as evidenced by the increase in proportion of people of color across nearly all census tracts. Thurston County’s population of people of color increased by 9% (as a proportion of the total population) between 2010 and 2020. However, there are some tracts that experienced greater increases than others. Countywide, people of color comprise about 19% of the population.

The greatest increase in the population of people of color (by census tract) occurred in Lacey or unincorporated Thurston County around Lacey.

- The greatest change in race/ethnicity by census tract occurred in the area near the Billy Frank Jr. Wildlife Refuge on the eastern border of the county. In this tract, there was a 24.2% increase in the percentage of people of color between 2010 and 2020 (adjusting for population growth). In 1990, this tract’s population was 93% white, non-Hispanic and in 2020, the tract’s population was 64% white, non-Hispanic.

- A tract north of Lacey (containing Pleasant Glade Elementary) had a 18.4% increase in people of color living in the tract from 2010 to 2020 (adjusting for population growth). In 1990, this tract was 88% white, non-Hispanic and in 2020, the tract was 76% white, non-Hispanic.
- Another area that experienced a significant increase (18.8%) in people of color from 2010 to 2020 was the tract between 37th and 45th Avenue SE in Lacey (west of College Street and east of the Chehalis Western bicycle trail). In 1990, this tract was 89% white, non-Hispanic and in 2020, was 74% white, non-Hispanic.

Only two tracts in Thurston County experienced a decrease in the percentage of population identified as people of color.

- The tract around Capitol City Golf Club (south of Yelm Highway) had a 4.1% decrease in the people of color population between 2010 and 2020 (adjusting for population growth). In 1990, this tract's population was 89% white, non-Hispanic and in 2020, this tract's population was 80% white, non-Hispanic. This tract is located just south of a tract that experienced an 18.8% increase in people of color population and another tract with the highest proportion of people of color in the county (around Rainier Vista Community Park). This stretch of Yelm Highway is a dividing line, where tracts south of Yelm Highway are in unincorporated Thurston County, while tracts to the north are in Lacey.
- The area between Tenino and Bucoda also experienced a 0.2% decrease in the people of color population from 2010 to 2020. In 1990, this tract was 96% white, non-Hispanic and in 2020, the tract was about 90% white, non-Hispanic.

There are a few tracts that appear to be more rapidly integrating in recent years.

- One area is in Olympia between 18th Avenue and I-5, east of Boulevard Road (near the Olympia Regional Learning Academy). This tract is still predominantly white, non-Hispanic (83%) but experienced nearly 16% growth in proportion of residents of color from 2010 to 2020. In 1990, this area was 93% white, non-Hispanic.
- Other areas that have moderately high growth (13%+ increase) in people of color that appear to be integrating: around South Bay, around Yauger Park and Capital Mall, around Grass Lake in Olympia, around Horizons Elementary School in south Lacey, around Lowe's (north of Yelm Highway), north of I-5 in Lacey (around Cabela's), Yelm, and in Olympia north of Yelm Highway around Briggs YMCA.

A few areas appear to have less rapid growth of people of color over the past ten years, but still have relatively high people of color populations. This indicates that these areas have historically been more accessible to people of color. The accounts of steering by real estate agents in Dr. Jackson's book and map of racially restricted covenants further confirm this data. These areas have been segregated over a longer period of time and may be slowly integrating. Monitoring demographic change in future years may help to determine if people of color are experiencing displacement due to gentrification.

In 1990, the three tracts with the highest concentrations of people of color in the county were: Tanglewilde (23% people of color), around the RAC (26% people of color), and the Nisqually Reservation (26% people of color).

- In 2020, Tanglewilde's population was 29% people of color.

- In 2020, the area around the Regional Athletic Complex (RAC) had a population that was 37% people of color.
- The Nisqually Valley experienced very low growth between 2010 and 2020 in the people of color population (1.4%). In 2020, the tract's population was 25% people of color.
- The tract around Lakes Elementary school had a population that was 31% people of color in 2020 and relatively low increase in people of color from 2010 to 2020 (5.3%).

There are tracts that are predominantly white, non-Hispanic that experienced little growth in their populations of people of color between 2010 and 2020, indicating that there is higher degree of segregation and difficulty to integrate these areas. Several of these areas have presence of historical racially restrictive covenants (Rich Road near Old Highway 99, Lake St. Clair, Bigelow Lake, southeast Olympia around Wildwood and Olympia High School).

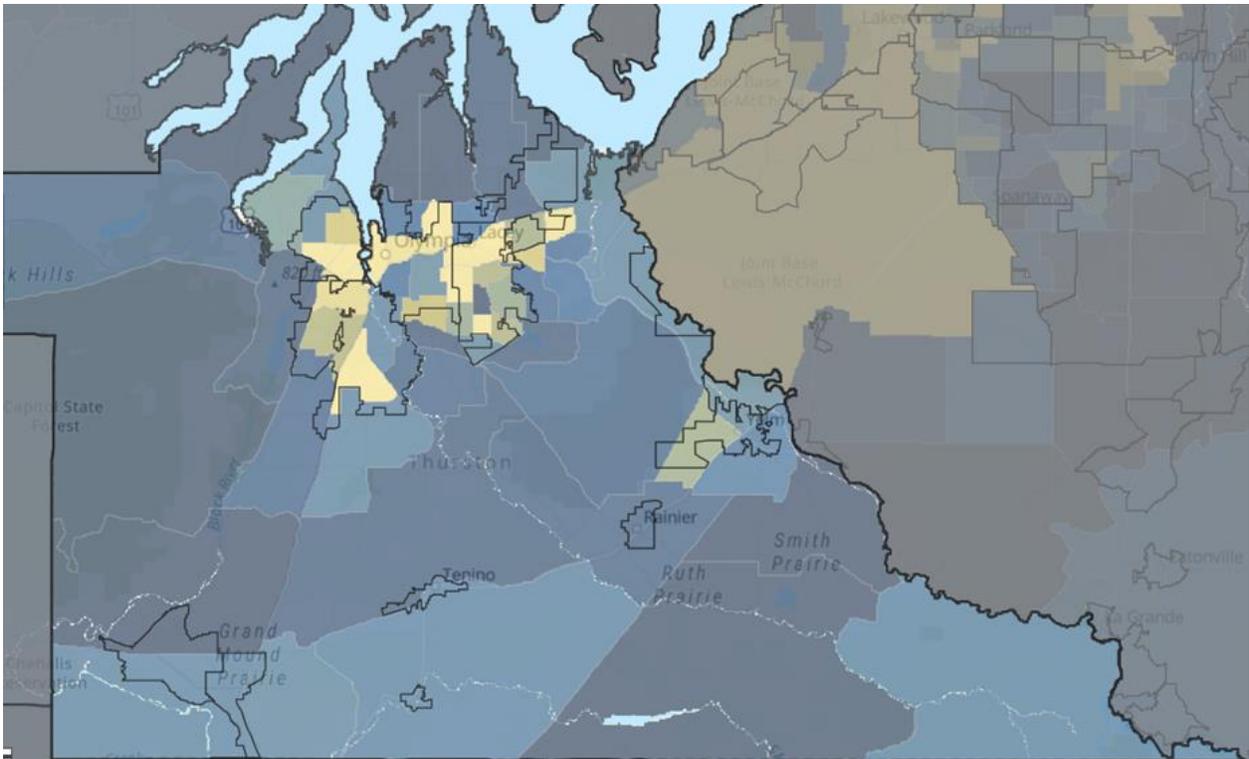
- The area around Woodard Bay had a 4.8% increase in the population of people of color from 2010-2020. In 1990, this tract (combined with Boston Harbor) was 96% white, non-Hispanic and in 2020, was 93% white, non-Hispanic.
- The tract around Rich Road (south of Olympia) experienced a 5.1% growth in people of color between 2010 and 2020 (adjusted for inflation). In 1990, this tract was 94% white, non-Hispanic and in 2020, was 92% white, non-Hispanic.
- The tract around Lake St. Clair stretching south along Rainier Road experienced 3.5% growth in people of color from 2010-2020. In 1990, this tract was 93% white, non-Hispanic and in 2020, was 90% white, non-Hispanic.
- Other areas that are predominantly white, non-Hispanic that have experienced low growth in people of color populations: the Wildwood area in Olympia, around Olympia High School, south of Rochester, south of Rainier, north of Littlerock (east of I-5 between Tumwater and Littlerock), the area around Tilley Road (northwest of Tenino), Oyster Bay, southwest Olympia (east of Black Lake Boulevard), just North of Olympia around Bigelow Lake, north of Squaxin Park in Olympia stretching part of the way up the Boston Harbor peninsula.

d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

Generally, homeownership rates are higher in rural Thurston County and lower in the urban areas, where there is greater diversity of racial/ethnic groups, people born outside the U.S. and people with Limited English Proficiency. In Lacey, Olympia and Tumwater, 60% of people of color are renters while only 47% of white, non-Hispanic households are renters. Countywide, about 44% of people of color rent while 32% of white, non-Hispanic households rent.³²

The map below shows homeownership rates, where darker shading indicates higher rates of homeownership and yellow indicates more renter households. There is a higher proportion of renter households in Lacey along I-5, in areas which historically have been populated by people of color. Areas which have high white, non-Hispanic population have high rates of homeownership: Wildwood, around Rich Road, Boston Harbor peninsula and Woodard Bay.

³² American Community Survey 2016-2020 5-year Estimates, Table ACS: B25003, B25003a through B25003H



The highest rate of homeownership (95.6%) is in the South County, southeast of Rainier. Around Boston Harbor, homeownership rates are 91.6% and on Steamboat Island, homeownership rates are 90.9%. The areas identified above are all over 80% white, and under 10% of the population has Limited English Proficiency or was born outside the U.S.

In Olympia, the highest rates of homeownership (85.6%) are on the border with Tumwater around Ken Lake. This tract (largely outside Olympia city limits) is 88% white, non-Hispanic.

In and around Lacey, the highest homeownership rates are 87.9% in the area around Komachin Middle School and Wonderwood Park and next highest (86.5%) in the Beachcrest area around Tolmie State Park. The tract around Wonderwood Park has 75% white, non-Hispanic population, but also has the highest proportion of Black or African American individuals in Thurston County (12.6%). The Beachcrest area is about 88% white, non-Hispanic.

The lowest rate of homeownership in Thurston County is 13.4% on Olympia's southwest side around Capital Mall. This area is about 80% white, non-Hispanic, under 10% of the population was born outside the U.S. and less than 2% of the population has Limited English proficiency. This tract experiences the highest rate of poverty in the county.

The area with the next lowest homeownership rate (15.6%) is in Tumwater, around the Olympia airport and between I-5 and Capitol Boulevard/Old Highway 99. This census tract has the greatest number of Hispanic/Latinx households in proportion to the overall population.

The lowest rate of homeownership in the South County is 59.3%, located in the western side of Yelm, where the population is nearly 88% white, non-Hispanic.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

Risk of Displacement: People of color in Thurston County are more likely to rent than own their homes. Renters are more vulnerable to displacement by eviction, a landlord choosing to sell their rental property or move back into the unit. Rent increases were steep and swift after the end of the eviction moratorium. According to community survey results, more people of color than white respondents worry they are at risk of eviction or foreclosure in the next 6 months. About 43% of American Indian or Alaska Native respondents (15 of 35), 41% of Hispanic/Latinx respondents (15 of 37), 34% of Black or African American respondents (10 of 29), and 33% of Native Hawaiian or other Pacific Islander respondents (2 of 6) feel they could be at risk of eviction or foreclosure in the next 6 months, compared to 25% of white respondents. Across race and ethnicity, increasing rent/housing costs was the most reported reason contributing to fear of eviction or foreclosure, followed by loss of income or employment.

Vacancy rate: According to the Washington Center for Real Estate Research, the apartment vacancy rate was 2.5% in 2022, down from 4.0% in 2020. The rental market in Thurston County is incredibly tight, creating a competitive market where people with lower incomes and any screening barriers put applicants at a higher disadvantage.

Screening barriers: Considering the cost of housing, income to rent ratios where applicants are required to make three times (or more) the monthly rent are not attainable for many Thurston County residents. Any other challenges (such as a prior eviction, debt, low credit score or no credit history) make it even more difficult to access housing.

High move-in costs: Many rental units require application fees, deposits, non-refundable fees, pet fees, and other costs upfront at move-in. These costs can often add up to over \$5,000. The City of Olympia passed an ordinance in 2022 that limits amounts of move-in costs to one month’s worth of rent and prohibits non-refundable fees (such as an administrative fee).

Low incomes and poverty rates: Median household income is the threshold where half of the households earn more and half earn less. The Washington State Office of Financial Management estimates that Thurston County’s median household income was \$81,693 in 2021. According to the TRPC, when adjusted for inflation, Thurston County’s 2021 estimated median household income is actually less than both 2019 (\$81,741) and 2020 (\$82,720). Nearly 10% of Thurston County’s population has income below the federal poverty level. Poverty rates are higher among people of color than white residents of Thurston County. Olympia residents face even higher rates of poverty. Over 20% of Olympia residents who are Black or African American, Native Hawaiian or other Pacific Islander, or those who identified as some other race have income below the federal poverty level.

Race/Ethnicity	% of population below federal poverty level (Thurston County)	% of population below federal poverty level (Olympia)
TOTAL	9.8%	14.5%
White	9.1%	14.0%
Black or African American	15.5%	21.6%
American Indian and Alaska	14.7%	18.7%

Native		
Asian	12.2%	13.9%
Native Hawaiian and Other Pacific Islander	15.6%	21.0%
Some other race	17.9%	27.4%
Two or more races	10.3%	17.2%
Hispanic or Latino origin (of any race)	14.0%	17.2%

Source: American Community Survey 2016-2020 5-Year Estimates, Table S1703

Female-headed family households had a poverty rate of 19.9% countywide and 28.1% in Olympia. In Thurston County, 15.8% of people with disabilities have income below the federal poverty level and 22.8% of Olympia residents have income below the federal poverty level.

Cost of housing: The increasing cost of housing will continue to make it difficult for low-income persons to purchase homes in the jurisdiction and the region. According to the Northwest Multiple Listing Service (NWMLS), the median home price in 2021 in Thurston County was \$455,000. Low-income persons may be limited to living in rental properties and limited to living in multi-family housing. Average rents in Fall 2022 in Thurston County were \$1,525³³.

Residential Building has not been keeping up with population growth: According to Thurston Regional Planning Council’s Housing Needs Assessment for the Cities of Lacey, Olympia, and Tumwater: Over the next 25 years, Thurston County’s population is anticipated to grow by another 89,200 people at a rate of 1.1 percent per year on average – to about 383,500 people. Between 2020 and 2045, Thurston Regional Planning Council (TRPC) projects 34,000 new units will need to be built to accommodate the region’s growing population. If 34,000 units must be created over 25 years, the Cities of Lacey, Olympia, and Tumwater must keep pace by building at least 1,360 new residential units each year. According to the TRPC³⁴, 891 residential building permits were approved by the three cities in 2019 and 1,001 residential building permits were approved in 2020. Development trends are shifting, however, and cities must catch up to continue to keep on track with the growing population’s housing needs. A total of 1,957 residential building permits were approved in 2021 (with Lacey approving over 1,200 of those permits).

As noted by the TRPC in the Housing Needs Assessment, there has been a general trend towards development in zones that allow higher densities of development over the past 20 years. Multifamily unit construction has increased from about 30 percent of new units in 2000 to over 60 percent in 2019. In addition to the increasing number of multifamily units being constructed, changes to zoning to allow more homes per acre and more infill and redevelopment projects have led to an overall increase in housing densities across the three cities and their urban growth areas.

There is strong community opposition against multifamily residential development and programs that incentivize market rate development, such as the Multi-Family Tax Exemption. Cities must continue to meet population demands by building units, and plan for the housing needs of all residents—including

³³ <https://wcrer.be.uw.edu/wp-content/uploads/sites/60/2022/10/Washington-Apartment-Market-Report-Fall-2022-Final.pdf>

³⁴ <https://www.trpc.org/475/Residential-Building-Permits>

those who need affordable and supportive housing options. Changes in 2021 to the Growth Management Act require local governments to plan and accommodate for housing affordable to all income levels, including emergency shelters and permanent supportive housing. These changes also directed Department of Commerce to provide guidance on anti-displacement strategies to mitigate potential impact of development on communities of color.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

Half of all survey respondents stated that their neighborhood has a mix of people from different racial, ethnic and cultural backgrounds. About 27% of all survey respondents do not believe their neighborhood has a mix of people from different racial, ethnic, and cultural backgrounds. The remaining respondents were either neutral or did not know. Responses were similar from people of color only.

Survey respondents were asked if they had considered moving out of their current city, county, state, or the country. Respondents were asked the reason why they had considered moving. Most of those respondents (224 or about 81%) have considered moving because it is too expensive. Thirty-eight respondents selected 'there are more people who share my cultural background somewhere else.' Of those 38 respondents, 22 (58%) were people of color.

One survey respondent stated: *'The area we want to live seems to keep "our kind" out. It's happened in numerous places we've looked.'*

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.

No additional information at this time.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

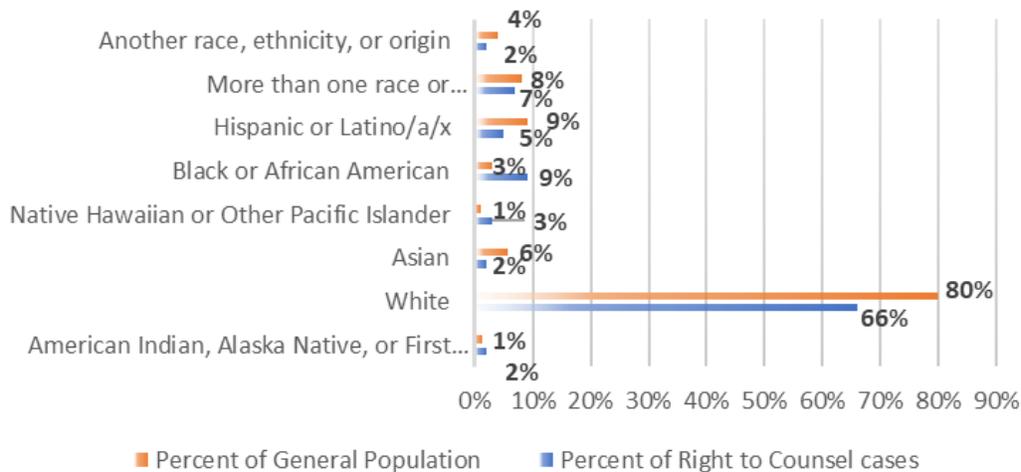
- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending discrimination

- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

Displacement of residents due to economic pressures: High demand for housing and low vacancy rates are causing displacement of low-income persons, including protected classes, due to economic pressures. The Washington State Legislature passed SB 5160 in 2021, which made Washington the first state to guarantee legal counsel to low-income tenants in eviction proceedings. Right to Counsel data³⁵ from January 2022 to October 2022 indicates that Black or African American and Native Hawaiian or other Pacific Islander tenants were overrepresented in eviction proceedings in Thurston County at nearly three times the rate of their proportion of the population. While Black or African American individuals comprise about 3% of Thurston County's general population, 8.5% of tenants assisted through Right to Counsel in 2022 were Black or African American. While Native Hawaiians or other Pacific Islanders comprise about 0.9% of Thurston County's population, they represented 2.8% of clients assisted by Right to Counsel for an eviction. Community advocates have shared that clients of color are provided notices more often or more quickly than white clients, and that rules are not enforced equally. Advocates who work with Spanish-speaking community members have indicated that many tenants self-evict (leave before formal eviction proceedings begin) due to lack of understanding of the written notice, or the legal process, which may account for the lower distribution of Hispanic/Latinx and Spanish-speaking tenants served by Right to Counsel. Additionally, 26% of tenants assisted by Right to Counsel had a disability, compared to 14% of the general population.

³⁵ <https://ocla.wa.gov/wp-content/uploads/2022/10/Right-to-Counsel-Dashboard-10-17-22.xlsx>

DISTRIBUTION OF EVICTION CASES COMPARED TO DISTRIBUTION OF GENERAL POPULATION



Source: Office of Civil Legal Aid³⁶

About 13.7% of tenants who received COVID-related emergency rent assistance were Black or African American (compared to 3% in the general population) and about 2.9% of tenants who received COVID rent assistance were Native Hawaiian or other Pacific Islander (compared to 0.9% of the general population).³⁷

Nearly 66% of Black or African American community survey respondents and 83% of Native Hawaiian or other Pacific Islander respondents reported losing household income due to COVID. About 41% of white respondents, 54% of Hispanic/Latinx respondents, 45% of Asian respondents, and 57% of American Indian or Alaska Native respondents reported losing household income due to COVID.

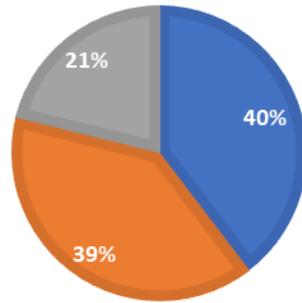
Private discrimination & Source of income discrimination: Forty-five fair housing complaints were filed with HUD and the Washington State Human Rights Commission in the past five years in Thurston County. According to the community survey results, many individuals who have experienced housing discrimination do not pursue complaint filing. Of the 613 total respondents to the online community survey, 37% believe they or someone they know has experienced housing discrimination in Thurston County and 20% were not sure if they or someone they know had experienced housing discrimination. Only 12% of survey respondents who believed they (or someone they know) experienced housing discrimination stated they filed a complaint. This indicates that there is a much higher rate of discrimination experienced by Thurston County residents than is reported to HUD.

³⁶ <https://ocla.wa.gov/wp-content/uploads/2022/10/Right-to-Counsel-Dashboard-10-17-22.xlsx>

³⁷ <https://insight-editor.livestories.com/s/v2/washington-state-department-of-commerce-emergency-rental-relief-distribution/ce5d59f3-36fe-4633-8768-759eca2ea077>

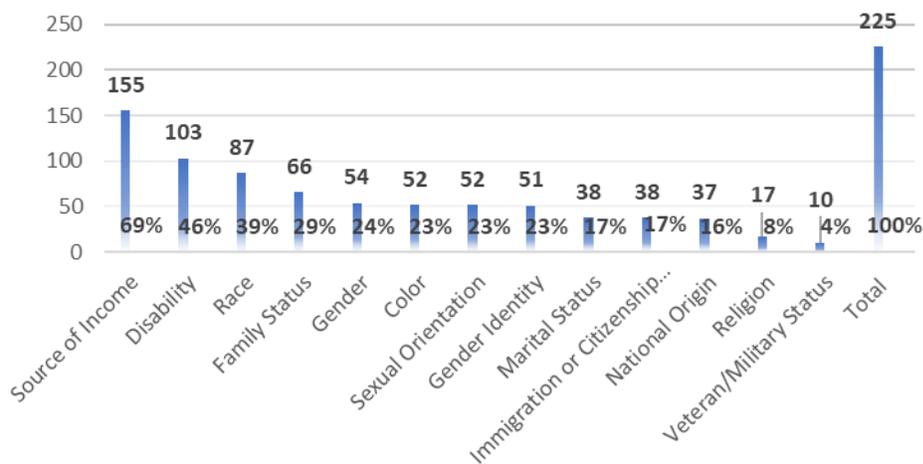
HAVE YOU OR HAS SOMEONE YOU KNOW EXPERIENCED HOUSING DISCRIMINATION IN THURSTON COUNTY?

■ Yes/I think so ■ No/I don't think so ■ Not sure



Of the 613 respondents to the community survey, 37% believe they or someone they know has experienced housing discrimination in Thurston County (20% are not sure). The most common bases of discrimination reported by survey respondents overall were: source of income, disability, and race. This closely aligns with the reported cases of discrimination filed in Thurston County over the past five years. Thirty-three complaints were filed on the basis of disability, 10 complaints were filed based on race and 4 complaints were filed based on family status. The most common discriminatory acts reported by respondents were: refusal to rent or deal based on a protected class, different terms or conditions, and falsely told housing was not available when in fact it was available. Private rental discrimination was the most frequently reported by survey respondents, with 97% of respondents reporting that a landlord or property manager discriminated against them or someone they know.

DISCRIMINATION BASIS



Reported experiences of discrimination were higher among certain protected class groups who responded to the survey.

- Eleven of 15 respondents (73%) who identified as **transgender** believe they or someone they know has experienced housing discrimination in Thurston County. Most believe the discrimination occurred based on their: disability or source of income (53% each), followed by sexual orientation or gender identity (47% each). The most common forms of discrimination reported: refused to rent or deal with you (53%), denied a reasonable accommodation or modification for a disability (53%), falsely told housing wasn't available when it was available (47%).
- Four of six respondents (67%) who identified as **Native Hawaiian or other Pacific Islander** believe they or someone they know has experienced housing discrimination in Thurston County. Most believe the discrimination occurred based on their: source of income (75%), disability (50%), immigration status (50%), race (50%), color (50%). All reported the discrimination was by a landlord or property manager (4 of 4), however a high number reported the discriminatory actions were by a neighbor or other tenant (3 of 4).
- Fifteen of 29 respondents (52%) who identified as **Black or African American** believe they or someone they know has experienced housing discrimination in Thurston County. Most believe the discrimination occurred based on their: race (43%), source of income (29%), and disability (25%). The most common forms of discrimination reported: falsely told housing wasn't available when it was available (25%), different terms or conditions (25%), harassment or intimidation based on protected class (21%).
- Nineteen of 35 respondents (54%) who identified as **American Indian or Alaska Native** believe they or someone they know has experienced housing discrimination in Thurston County. Most believe the discrimination occurred based on their: source of income (79%), 12 due to disability (63%), race (53%). Most reported the discrimination was by a landlord or property manager (18 of 19), however a high number reported the discriminatory actions were by a neighbor or other tenant (7 of 19). The most common forms of discrimination reported: refused to rent or deal with you (58%), denied a reasonable accommodation or modification for a disability (53%), harassment or intimidation based on a protected class (47%), different terms or conditions (47%).
- About 45% of **people with disabilities** believe they or someone they know has experienced discrimination in Thurston County compared to 28% of respondents without disabilities. Most believe the discrimination occurred based on their disability (27%) or source of income (32%). The most common forms of discrimination reported: refused to rent or deal with you (25%), different terms or conditions (22%), denied a reasonable accommodation or modification for a disability (17%).

Survey respondents were also asked if they had considered moving out of their current city or county because their housing does not meet their needs. Nearly 64% of American Indian or Alaska Native respondents reported that one of the reasons they have considered moving is that there are more people who share their cultural background somewhere else. About 67% of Native Hawaiian or other Pacific Islanders and 45% of Black or African American respondents reported they have considered moving because they don't feel welcome.

The high numbers of fair housing complaints related to disability, family status and race could reflect the actual prevalence of these forms of discrimination. However, these numbers could be the result of increased access to services and ability to file complaints. Discrimination is often easier to detect when

landlords or other housing providers refuse to make reasonable accommodations or modifications for people with disabilities. Conversely, fewer complaints regarding religion, national origin, gender identity, or other protected classes does not mean there is an absence of housing discrimination towards these and other protected classes. Instead, it could mean less access to services, fear of filing complaints and other factors. Additionally, 63% of survey respondents indicated they did not file a complaint because they did not believe it would make a difference.

Lending discrimination: Home mortgage and lending discrimination were identified in the online community survey.

- 20% reported that a real estate agent discriminated against them
- 11% reported that a mortgage lender discriminated against them
- 11% reported that their real estate agent steered or directed them toward or away from particular neighborhoods or areas

According to the community survey, people of color, people born outside the U.S., and people with disabilities experienced more difficulty accessing mortgage loans when they purchased (or attempted to purchase) a home in Thurston County:

- 10.7% of white respondents indicated difficulty accessing a mortgage loan
- 25.0% of Black or African American respondents indicated difficulty accessing a mortgage loan
- 10.8% of Hispanic/Latinx respondents indicated difficulty accessing a mortgage loan
- 13.8% of Asian or Asian Indian respondents indicated difficulty accessing a mortgage loan
- 14.3% of American Indian or Alaska Native respondents indicated difficulty accessing a mortgage loan
- 13.7% of respondents with disabilities indicated difficulty accessing a mortgage loan
- 19.4% of respondents born outside the U.S. indicated difficulty accessing a mortgage loan

All respondents were asked if they had ever been denied a mortgage loan or application.

- 19.7% of white respondents have been denied a mortgage loan or application
- 35.7% of Black or African American respondents have been denied a mortgage loan or application
- 32.4% of Hispanic/Latinx respondents have been denied a mortgage loan or application
- 27.6% of Asian or Asian Indian respondents have been denied a mortgage loan or application
- 22.9% of American Indian or Alaska Native respondents have been denied a mortgage loan or application
- 25% of respondents with disabilities have been denied a mortgage loan or application
- 19.4% of respondents born outside the U.S. have been denied a mortgage loan or application

Community Opposition, Land use and zoning laws, Location of affordable housing: Regionally, community opposition, land use and zoning laws and location of affordable housing continues to put pressure on protected class members' ability to choose housing that is affordable and in high opportunity areas. While many land use and zoning laws have changed over the last several years to encourage more 'Missing Middle' housing units (such as duplexes, triplexes, and accessory dwelling units), there are still few areas that are zoned for higher density multifamily units. For example, 68% of the City of Olympia is zoned for low density. Community opposition to higher density housing and

affordable housing continues to present a challenge to local jurisdictions. Additional requirements or public meetings can increase costs for developers. The legacies of land use and zoning laws that prevented multifamily development and affordable housing development are still apparent, where there are few opportunities to move to neighborhoods that have traditionally been zoned for single-family homes. There are few areas of undeveloped land in the urban core that are not in environmentally sensitive areas or have other barriers to development. In outlying areas, lack of infrastructure (such as sewer systems) make development more difficult.

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

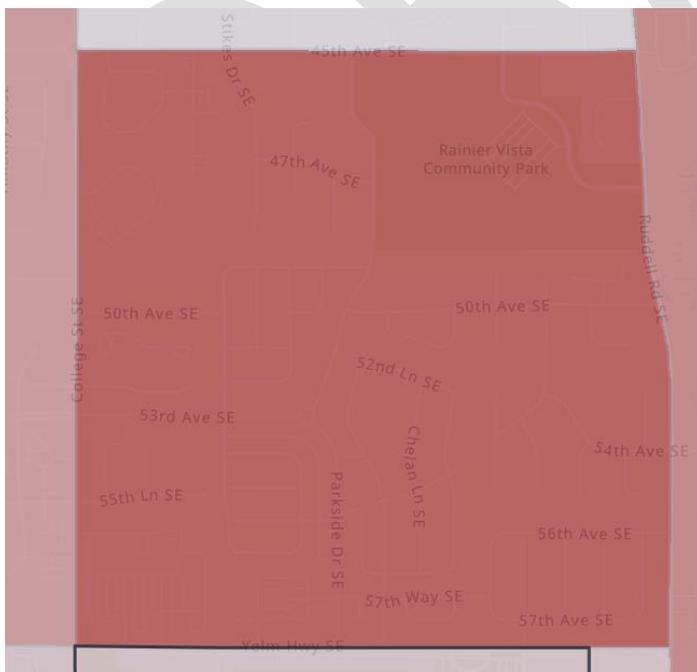
1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

Thurston County does not have any HUD-designated Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). HUD defines R/ECAPs as having both a non-white population of 50% or more, and where 40% of individuals (or greater) have income at or below the federal poverty line (or three times the local average of households living below the federal poverty line). Pierce and King counties have multiple R/ECAPs, but no other neighboring counties have R/ECAPs.

The area that has the highest rate of poverty and concentration of people of color is in Lacey in Census Tract 116.25 containing Rainier Vista Community Park. The population in this tract is 41% people of color (not including white, Hispanic/Latinx individuals). Roughly 23% of the population has household income that is below the federal poverty level. This area is bordered by College Street, Ruddell Road, Yelm Highway and 45th Avenue SE.

Map of Census tract 116.25



Other areas that have higher rates of people of color and rates of poverty are:

- Tract 123.20: The tract surrounding River Ridge High School in Lacey. The population is 28.6% people of color and 21.6% of residents have income below the federal poverty level. This tract has the highest rate of children living in poverty in the county.
- Tract 120.01: The area around the Evergreen State College is 31.9% people of color and 16.2% of residents have income below the federal poverty level.
- Tract 108.01: The tract around the Olympia airport has 27.3% people of color population and 15.9% of residents have incomes below the federal poverty level.

b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

While Thurston County does not have any HUD-designated R/ECAPs, Census Tract 116.25 around Rainier Vista Community Park is 17.8% Hispanic/Latinx, 13.7% Asian, 12% two or more races, 7.7% Black/African American, and 1% Native Hawaiian or other Pacific Islander. Thurston County's overall population is 9.3% Hispanic/Latinx, 5.7% Asian, 7.8% two or more races, 3% Black/African American, and .9% Native Hawaiian or other Pacific Islander. There are fewer individuals with Limited English Proficiency (2.1%) in this tract than in Thurston County overall (3.9%). About 15% of individuals in this tract were born outside the U.S. compared with 8.3% of the overall population in Thurston County. About 23% of households in this tract have income below the federal poverty level compared to 10% countywide.

c. Describe how R/ECAPs have changed over time in the jurisdiction and region.

No prior R/ECAPs have been identified in Thurston County. Between 2010 and 2020, the tract around Rainier Vista Community Park experienced an 11.3% increase in population of people of color. Countywide, the population of people of color increased by 9%.

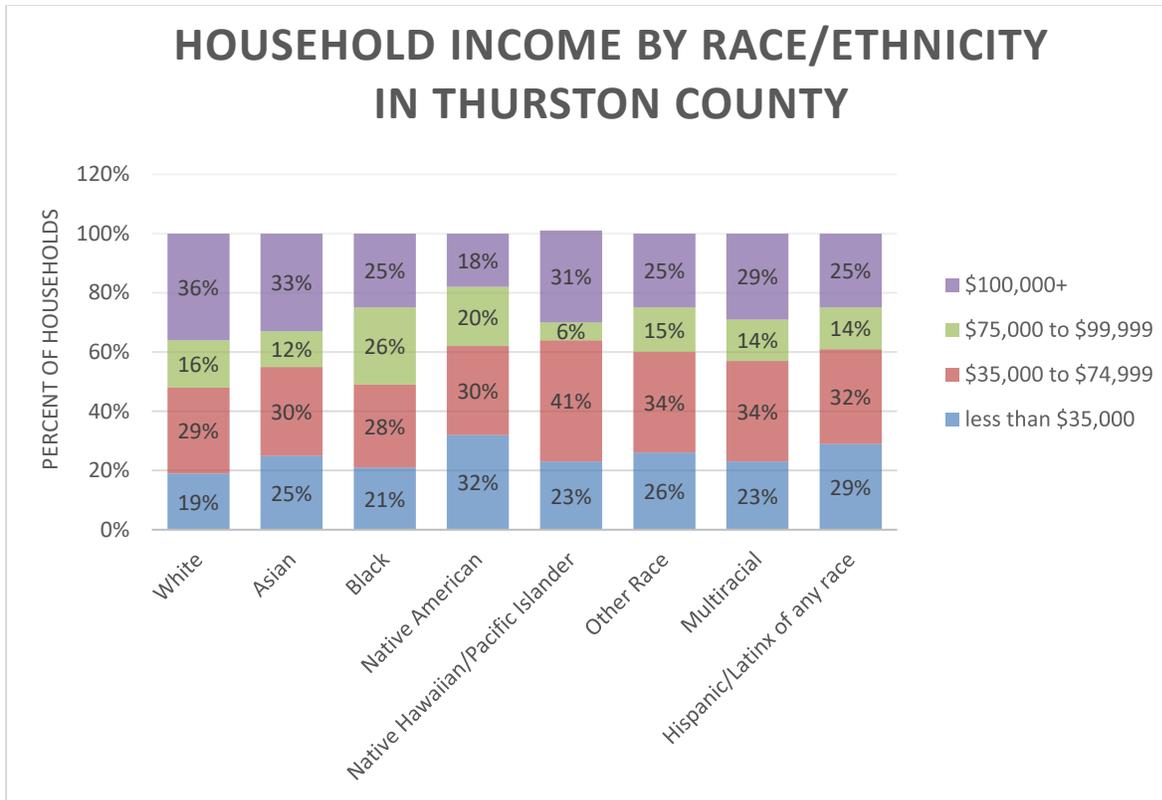
2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

Joint Base Lewis-McChord is a key employer in the area, bringing greater racial and ethnic diversity to Thurston County and to Lacey, in particular. According to TRPC³⁸ for the 2017-2021 time period, an average of about 5,275 active-duty military personnel lived in Thurston County. According to a 2016 survey of over 3,000 respondents (including active-duty service members, civilian employees and military retirees), about 29% of respondents live in Thurston County with the majority in Lacey, Olympia, and Yelm. The second most attended school district for all respondents with school-age children was North Thurston School District with 200 students (17% of all responses). Of the active-duty military respondents, about 15% live in Lacey and 6% live in Olympia, and about 60% rent while 34% own (sample also included on-base respondents living in barracks). Of the civilian and military retiree respondents, about 16% live in Lacey, 13% live in Olympia, and 6% live in Yelm, and 19% rent while 81% own.

³⁸ <https://www.trpc.org/424/Military-Employment>

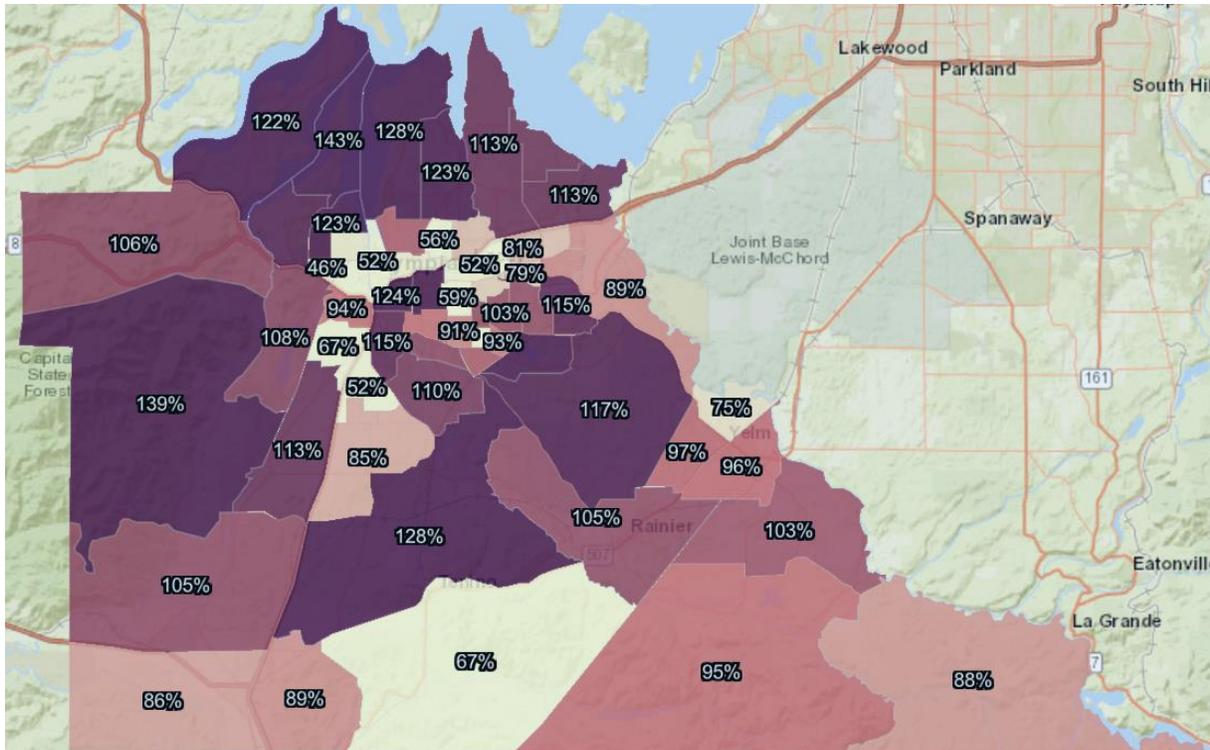
The figure below shows household incomes by race and ethnicity in Thurston County. White households have the highest representation among higher income brackets, with 36% of white households earning over \$100,000 annually. Native American households and Hispanic/Latinx households are more likely to earn under \$35,000 and less likely to earn over \$100,000 annually.



Source: 2016-2020 ACS 5-year Estimates, Tables B19001A-B19001I³⁹

The map below shows percentage of area median income by census tract. The area median income used for this analysis is \$81,693 which is calculated for 2021 by the Washington State Office of Financial Management. Areas with darker shading indicate higher median income. Tracts surrounding the waterfront have higher income, while tracts in the urban core tend to have lower median household income. There are also lower incomes around the Bucoda area in the South County and in North Yelm.

³⁹ https://data.census.gov/table?g=0500000US53067_1600000US5351300&tid=ACSDT5Y2020.B19001A



While Thurston County has no HUD-designated R/ECAPs, a few tracts were identified that have higher rates of poverty and higher populations of people of color. These tracts have lower median incomes.

- The tract containing Rainier Vista Community Park is at 59% of Area Median Income, with a tract median household income of \$47,813.
- The tract containing River Ridge High School is at 81% of Area Median Income, with a tract median household income of \$65,878.
- The tract surrounding the Evergreen State College is at 117% of Area Median Income, with a tract median household income of \$95,753. This indicates that there may be wider disparities in this tract, as there are a larger number of households with higher income (likely around the waterfront areas), and other areas with higher rates of poverty (likely around the college campus and in the nearby apartment complexes).
- The tract surrounding the Olympia airport is at 52% of Area Median Income, with a tract median household income of \$42,356.
- The tract surrounding St. Martin’s University in Lacey is at 52% of Area Median Income, with a tract median household income of \$42,755.

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.

Woodland District Strategic Plan: The Woodland District in Lacey is in the same census tract as St. Martin’s University where the population is 36% people of color. The District includes the area around South Sound Center and businesses south of I-5. The City of Lacey, in conjunction with various local partners, created a Woodland District Strategic Plan. The project was funded through a Federal

Department of Housing and Urban Development (HUD) Challenge Grant managed by Thurston Regional Planning Council (TRPC). The Plan is designed to knit together the different areas of the District into a cohesive neighborhood populated by businesses, employees and residents. The Action Plan for the District outlines 25 key actions designed to implement the vision of the District, with two specifically addressing housing:

Multifamily Tax Exemption Program: “The City of Lacey should designate the Woodland District for the Multifamily Tax Exemption to improve development feasibility and to stimulate the construction of new market rate and affordable housing opportunities within urban centers. The City must designate areas within an urban center for use of the program. Eligible projects are exempt from property taxation for 8 successive years; or for twelve years if the property commits to at least 20% of the multifamily housing units as affordable housing units.”

Affordable Housing Strategy: “Develop a strategy to provide a variety of housing in the District for a range of household types and income levels such as seniors, students, local employees and low- and moderate-wage workers. Programs could include rental production and preservation, operating & maintenance fund, rental assistance, homebuyer assistance, acquisition and opportunity loan funds and others. The strategy should support the multi-family tax exemption program and oversee compliance with the affordability requirements of the program.”

Martin Way Corridor Study: The [Martin Way Corridor Study](#) is a partnership between TRPC, Intercity Transit, Thurston County, and the cities of Olympia and Lacey. It specifically looks at the vision for the Martin Way corridor (a mixed-use corridor where people enjoy walking, shopping, working, and living) and the barriers to achieving that vision. One key goal from the study is to develop affordable housing at several points along the corridor. The study created a vision for future development that will include safety improvements for walking, biking, and transit access, and will make it easier for people with disabilities to get around. Other priorities include landscaping and improved connections with nearby services and amenities to enhance a sense of community, as well as retention and development of businesses.

The City of Olympia has a **Downtown Strategy** in place. One of the key visions is to create a livable urban residential neighborhood with a variety of housing choices for people who wish to minimize auto dependency, live close to work, prefer unique housing types, and enjoy Downtown amenities. Among the many goals identified, a top priority is for Olympia’s neighborhoods to provide housing choices that fit the diversity of local income levels and lifestyles. This includes zoning that allows a variety of housing types and densities; provide incentives for residences above business; and ensure affordable housing is available for all income levels throughout the community. In 2015, the City of Olympia passed a Community Renewal Area resolution, forming a CRA boundary in the downtown corridor, and directed staff to work with property owners and developers to develop a specific set of actions for which community renewal powers would be appropriate. In July 2016 the City Council adopted a Community Renewal Plan.

The City of Olympia’s **Multifamily Tax Exemption (MFTE)** program currently includes three geographic areas: downtown Olympia, along Harrison Avenue on the Westside, and along 4th Avenue on the Eastside. The program is designed to spur construction of new market rate and affordable housing opportunities in urban centers. Eligible projects are exempt from property taxation for 8 successive years; or for twelve years if the property commits to at least 20% of the multifamily housing units as

affordable housing units. Olympia is currently reviewing the MFTE program to determine if it should be expanded to other geographic areas, to evaluate its effectiveness in stimulating residential development, and identify any opportunities to expand its usefulness in promoting affordable housing development.

City of Tumwater Brewery District and Capitol Boulevard Corridor Planning Project: The City of Tumwater and Thurston Regional Planning Council partnered on a study to support the transformation of these districts into vibrant, mixed use, and walkable areas that support commerce and housing. The Brewery District includes the former Olympia Brewery and the triangle of roads formed by Custer Way, Cleveland Avenue, and Capitol Boulevard. The plan provides transportation enhancements, public improvements, a vision for building character and development intensity, and a set of implementation and phasing strategies to assist in transitioning the Brewery District into a multi-modal activity center with a mixture of housing and neighborhood-serving businesses. Planning for the area is a priority of the City of Tumwater Strategic Plan. The Capitol Boulevard Corridor Plan focused on the section of Capitol Boulevard between the Southgate shopping center area and Israel Road.

Tumwater's City Council approved a Multifamily Tax Exemption (MFTE) program in 2017 to provide 8- and 12-year tax exemptions for multifamily projects in the Brewery District and Capitol Boulevard Community plan areas. The Tumwater City Council adopted Resolution No. R2018-016 in 2018, which laid out a series of strategic actions to address homelessness and affordable housing in the City, including strengthening incentives for affordable housing within the Capital Corridor and Brewery District. In 2019, the City Council expanded the MFTE program for just the 12-year option to include the Town Center and Littlerock Road subarea, effectively covering most of the high-density areas in the served by Intercity Transit.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions

- Private discrimination
- Source of income discrimination
- Other

Displacement of residents due to economic pressures: Community survey respondents were asked about their experiences of displacement and fear of losing their housing. About 19% (7 of 37) Hispanic/Latinx respondents reported that they have experienced eviction or foreclosure, compared to 15% of white respondents. More people of color than white respondents worry they are at risk of eviction or foreclosure in the next 6 months. About 43% of American Indian or Alaska Native respondents (15 of 35), 41% of Hispanic/Latinx respondents (15 of 37), 34% of Black or African American respondents (10 of 29), and 33% of Native Hawaiian or other Pacific Islander respondents (2 of 6) feel you could be at risk of eviction or foreclosure in the next 6 months, compared to 25% of white respondents. Across race and ethnicity, increasing rent/housing costs was the most reported reason contributing to fear of eviction or foreclosure, followed by loss of income or employment.

Community survey respondents were asked: In the past year, have you considered moving out of the city or county where you currently live because your housing does not meet your needs? Nearly 67% of Native Hawaiian or other Pacific Islanders, 62% of Black or African American and 57% of American Indian or Alaska Native respondents had considered moving in the past year, compared to 46% of white respondents. Across race and ethnicity, the most reported reason for considering relocation was it is too expensive where they currently live.

Respondents were also asked if they had been forced to move in the past five years. About 20% of American Indian or Alaska Native respondents had been forced to move due to their landlord selling the unit, renovating the unit, or moving back into the unit. About 14% of Black or African American respondents experienced displacement when the rent increased after the landlord made improvements or repairs to the unit, compared to 8% of white respondents.

Location and type of affordable housing, Land use and zoning laws: Many of the tracts with higher concentrations of people of color and higher poverty rates are located further on the outskirts of the three cities of Lacey, Olympia, and Tumwater: South Lacey (Rainier Vista Community Park), East Lacey (River Ridge High School), South Tumwater (Olympia airport), Olympia Urban Growth Area (Evergreen State College). Residents may need to commute further distances to access services and amenities. Some of these areas have lower cost housing options that are not necessarily publicly funded, such as certain apartment complexes and manufactured home parks. Limited affordable housing puts pressure on protected classes' ability to choose housing that is affordable and in high opportunity areas. Land use and zoning laws have prevented multi-family affordable housing units from being built in many areas that have traditionally been zoned for single family homes, and that are located in high opportunity areas.

iii. Disparities in Access to Opportunity

1. Analysis

a. Education

i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

Thurston County contains eight school districts: Griffin, Olympia, Tumwater, North Thurston, Tenino, Rainier, Yelm and Rochester. Olympia School District (SD), Tumwater SD, and North Thurston SD all serve students in the urban hub of the County. North Thurston serves Lacey and the corresponding urban growth area. Griffin SD serves unincorporated Thurston County northwest of Olympia, and Tenino SD serves students from the town of Bucoda as well as the City of Tenino.

The map below shows the school district boundaries within Thurston County.



North Thurston is the largest and most diverse school district in Thurston County, with over 50% students of color. Griffin, Rainier and Tenino School Districts are the smallest districts and approximately 80% of students are white. Of the South County, Yelm and Rochester School Districts are more diverse, with higher proportions of both American Indian or Alaska Native and Hispanic/Latinx students than other schools in the district.

School District Demographics, 2021-2022

DISTRICT	American Indian or Alaska Native	Asian	Black or African American	Hispanic or Latinx of any race(s)	Native Hawaiian or Other Pacific Islander	Two or More Races	White	TOTAL STUDENT COUNT
Griffin	1.9%	0.8%	1.3%	11.2%	0.2%	7.1%	77.6%	624

North Thurston	1.1%	7.1%	5%	22.2%	2.8%	16.1%	45.8%	15,101
Olympia	0.5%	7.3%	3.2%	13.6%	0.6%	11.4%	63.2%	9,798
Rainier	1.2%	0.9%	0.2%	10.6%	0.1%	7.8%	79.2%	925
Rochester	2.9%	0.7%	0.4%	26.1%	0.2%	7.8%	61.8%	2,105
Tenino	1.5%	0.5%	0.6%	9.7%	0.1%	6.5%	81%	1,252
Tumwater	0.6%	2.9%	1.8%	15.2%	0.5%	10.4%	68.5%	6,500
Yelm	1.80%	1.8%	1.7%	18%	1.9%	11%	63.8%	5,443

Source: OSPI⁴⁰

The Office of the Superintendent of Public Instruction releases performance data that can be used to assess additional measures beyond data provided by HUD. The table below compares measures for Thurston County school districts with statewide measures. Generally, all Thurston County school districts have higher rates of student attendance, with lower per student expenditures, than statewide rates. As evident in the table below, Tumwater, Olympia, and Griffin schools have higher rates of students that meet English-Language Arts (ELA), Math and Science standards than North Thurston or the South County districts. Rochester School District has the fewest number of students meeting ELA, math and science standards.

School District Report Cards, 2021-2022

DISTRICT	Students Enrolled	Met ELA Standards	Met Math Standards	Met Science Standards	High Math Growth	High ELA Growth	Students Regularly Attend	Per-Pupil Expenditure
Griffin	624	51.6%	42.7%	57.4%	32.5%	27.0%	93.3%	\$ 14,990
North Thurston	15,154	50.3%	33.5%	45.2%	32.3%	31.8%	88.6%	\$ 14,016
Olympia	9,777	59.2%	47.3%	52.1%	38.3%	39.5%	81.1%	\$ 13,781
Rainier	925	46.1%	37.2%	45.0%	37.3%	32.0%	86.6%	\$ 12,769
Rochester	2,101	44.5%	34.1%	36.1%	31.3%	31.9%	81.8%	\$ 14,235
Tenino	1,272	47.0%	28.6%	54.3%	41.7%	37.4%	92.6%	\$ 13,229
Tumwater	6,515	55.9%	42.2%	44.9%	34.7%	31.4%	91.5%	\$ 13,314
Yelm	5,442	48.5%	35.5%	42.5%	36.3%	34.8%	82.2%	\$ 13,342
Washington State	1,091,404	50.7%	37.7%	42.7%	33.7%	33.6%	80.1%	\$ 17,082

Source: OSPI⁴¹

The schools in the table below have the highest rates of students qualifying for free or reduced meals in Thurston County in 2021-22. Several South County schools and schools in the North Thurston school district are included, as well as schools in west Olympia. Schools with over 50% students of color are highlighted. Nearly all the schools with high population of students of color are in the North Thurston School District.

⁴⁰ <https://www.k12.wa.us/data-reporting/data-portal>

⁴¹ <https://washingtonstatereportcard.ospi.k12.wa.us/>

School District	School Name	% students enrolled in free & reduced meal program	% Students of Color ⁴²	% White Students
N/A	Wa He Lut Indian School	98.5%	99.2%	0.8%
Yelm	Yelm Extension School	77.4%	37.5%	62.5%
Olympia	Garfield Elementary	72.8%	47.0%	53.0%
Olympia	Leland P Brown Elementary	67.4%	39.6%	60.4%
Yelm	Ft. Stevens Elementary	64.3%	36.5%	63.5%
Olympia	Julia Butler Hansen Elementary	63.1%	45.4%	54.6%
North Thurston	Lydia Hawk Elementary	61.8%	69.3%	30.7%
North Thurston	Lacey Elementary	56.8%	49.2%	50.8%
North Thurston	Mountain View Elementary	54.6%	57.0%	43.0%
Tenino	Tenino Elementary	54.6%	23.6%	76.4%
North Thurston	Envision Career Academy	52.2%	45.6%	54.4%
Rochester	Grand Mound Elementary School	51.5%	37.5%	62.5%
Yelm	Yelm Prairie Elementary	51.4%	28.4%	71.6%
North Thurston	Nisqually Middle School	51.4%	57.4%	42.6%
North Thurston	Chambers Prairie Elementary	51.0%	57.3%	42.7%
Yelm	Ridgeline Middle School	51.0%	34.3%	65.7%
Rochester	Rochester Middle School	50.5%	40.8%	59.2%
Tenino	Tenino Middle School	50.2%	20.5%	79.5%
Yelm	Yelm Middle School	50.0%	41.5%	58.5%

Source: OSPI

The schools in the table below have the lowest enrollment in the free & reduced meal program. Schools with lowest population of students of color are highlighted.

School District	School Name	% students enrolled in free & reduced meal program	% Students of Color ⁴³	% White Students
Griffin	Griffin School	14.6%	22.4%	77.6%
Olympia	Centennial Elementary	14.9%	38.5%	61.5%
Olympia	Pioneer Elementary	16.3%	30.3%	69.7%
Olympia	Boston Harbor Elementary	16.4%	25.5%	74.5%
Olympia	Olympia High School	18.0%	33.0%	67.0%
Olympia	Washington Middle School	19.6%	35.4%	64.6%
Tumwater	Black Lake Elementary	25.8%	30.2%	69.8%

⁴² Note: demographics reflect the population of the entire school, not students enrolled in free & reduced meal program

⁴³ Note: demographics reflect the population of the entire school, not students enrolled in free & reduced meal program

Olympia	Lincoln Elementary	26.2%	28.8%	71.2%
Olympia	McKenny Elementary	26.2%	40.2%	59.8%
Tumwater	AG Black Hills West High School	26.8%	31.5%	68.5%
Olympia	East Olympia Elementary	27.5%	34.7%	65.3%
North Thurston	Horizons Elementary School	28.1%	52.4%	47.6%
Olympia	McLane Elementary	28.4%	44.2%	55.8%

Source: OSPI

The table below highlights the school report cards for schools identified above with both the highest and lowest rates of students of color and enrollment in free & reduced meal programs.

School District Report Cards, 2021-2022

School	Students Enrolled	Met ELA Standards	Met Math Standards	Met Science Standards	High Math Growth	High ELA Growth	Students Regularly Attend	Per-Pupil Expenditure
Wa He Lut Indian School	124	9.1%	3.0%	10.0%	28.8%	29.2%	38.7%	\$9,808
Mountain View Elementary (N. Thurston)	558	47.0%	36.0%	47.4%	29.2%	34.5%	78.4%	\$18,149
Nisqually Middle School (N. Thurston)	846	38.0%	18.8%	31.4%	33.9%	25.4%	92.0%	\$12,979
Lydia Hawk Elementary (N. Thurston)	488	33.8%	27.1%	38.7%	23.7%	30.3%	71.7%	\$16,479
Chambers Prairie Elementary (N. Thurston)	483	46.8%	39.1%	43.3%	26.9%	29.9%	77.8%	\$16,181
Griffin School (Griffin)	624	51.6%	42.7%	57.4%	32.5%	27.0%	93.3%	\$16,186
Boston Harbor Elementary (Olympia)	184	64.9%	63.9%	67.9%	19.1%	34.0%	92.2%	\$13,643
Pioneer Elementary (Olympia)	370	75.5%	65.4%	69.8%	35.3%	36.1%	94.3%	\$16,213
Black Lake Elementary (Tumwater)	401	66.7%	58.7%	63.5%	50.4%	51.2%	96.6%	\$15,249
Lincoln Elementary (Olympia)	243	45.0%	33.6%	46.2%	32.0%	34.2%	77.2%	\$16,827

Source: OSPI⁴⁴

⁴⁴ <https://washingtonstatereportcard.ospi.k12.wa.us/>

HUD Table 12 provides information on the “opportunity indicators” by race and ethnicity in Thurston County and the City of Olympia. The **School Proficiency Index** is based on test scores of 4th grade students. Values are percentile ranked and range from 0 to 100. Higher scores indicate higher school proficiency or test scores.

Generally, across racial and ethnic groups, Olympia students have slightly higher access to proficient schools than students countywide. The table shows that racial and ethnic groups in Thurston County have similar access to proficient schools, except for Native American students. Native American students have the most difficulty accessing high performing schools, followed by Latinx students. Access to proficient schools drops for Asian and Pacific Islander students living below the federal poverty level but remains similar for other groups.

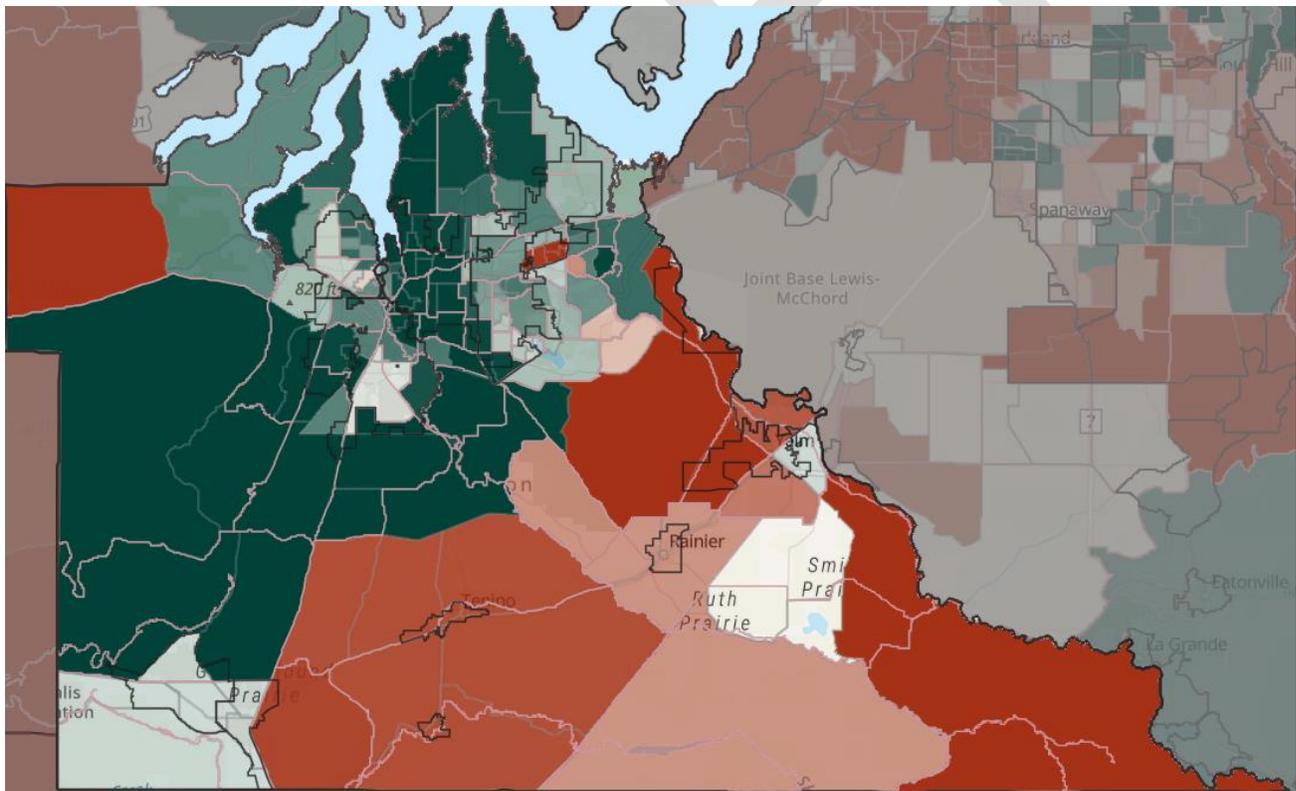
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Table 12 - Opportunity Indicators, by Race/Ethnicity	
	School Proficiency Index
(Thurston County, WA CDBG) Jurisdiction	
Total Population	
White, Non-Hispanic	58.63
Black, Non-Hispanic	57.12
Hispanic	55.40
Asian or Pacific Islander, Non-Hispanic	58.89
Native American, Non-Hispanic	49.30
Population below federal poverty line	
White, Non-Hispanic	56.70
Black, Non-Hispanic	57.11
Hispanic	58.38
Asian or Pacific Islander, Non-Hispanic	50.62
Native American, Non-Hispanic	46.23
(Olympia-Tumwater, WA) Region	
Total Population	
White, Non-Hispanic	60.62
Black, Non-Hispanic	58.35
Hispanic	57.41
Asian or Pacific Islander, Non-Hispanic	60.39
Native American, Non-Hispanic	51.93
Population below federal poverty line	
White, Non-Hispanic	58.97
Black, Non-Hispanic	57.63
Hispanic	61.84
Asian or Pacific Islander, Non-Hispanic	55.60
Native American, Non-Hispanic	50.44
<p>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</p> <p>Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).</p>	

ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

HUD's measure of **School Proficiency** is based on 4th grade state exam scores. According to HUD's data, the highest performing schools are in the Olympia and Tumwater School Districts, and the lowest are in Tenino and Yelm School Districts. Considering both the Olympia and Yelm School Districts have a student population that is 63% white, non-Hispanic, it doesn't appear that there are significant disparities in access to proficient schools (at the district level) among racial and ethnic groups. Reviewing census tract level data can help identify any demographic patterns around specific schools within districts.

The map below shows school proficiency, where red indicates the lowest performing schools and green indicates the highest performing schools. Areas of dark green (high performing schools) are clustered around the Eastside of Olympia (including downtown, southeast, and Boston Harbor peninsula), Tumwater's Black Hills area and around Capitol Forest, and unincorporated Thurston County south of Tumwater and Olympia. Red shading (showing low performing schools) is clustered around the eastern border of the county near Joint Base Lewis-McChord (including the Nisqually reservation, Yelm, and the Bald Hills area), Tanglewilde in the North Thurston School District, the far western border with Mason County, and Tenino.



The tracts with the lowest proficiency schools (13% proficiency) are in the Yelm School District around Southworth Elementary (where about 90% of the population is white, non-Hispanic) and the Nisqually reservation. HUD's School Proficiency Index demonstrates that Native American students have the most difficulty accessing high performing schools among all racial/ethnic groups in Thurston County.

The tracts with the next lowest school proficiency (15%) are located in the Tanglewilde area of Lacey. Lydia Hawk Elementary and Nisqually Middle School are located in these tracts. This area is populated by about 29% people of color, 59% homeowners, and 9% adults with Limited English Proficiency. The neighboring tract (containing River Ridge High School) has the highest rate of children living below the federal poverty level (47%) in Thurston County. Lydia Hawk has one of the highest rates of students accessing free and reduced lunch programs in the county. Nearly 62% of students accessed free or reduced lunch in 2021-2022 at Lydia Hawk.

The highest performing tract (74% proficiency) in the North Thurston School District is near the Nisqually Valley (Meadows Elementary is located here). This area is located near the lower performing tracts in the North Thurston District and has a higher proportion of people of color (around 37%), but lower rates of poverty and higher rates of homeownership (78% homeowners). A high number of renter households are cost-burdened in this area (about 70% of renters pay more than 30% of income on rent). It may be difficult for families who rent in that area to maintain housing or more difficult for families who rent to relocate to the area, due to high housing costs.

The highest performing schools in Thurston County are located in the Boston Harbor area with 95% proficiency (where almost 93% of the population is white, non-Hispanic), followed by Tumwater schools with 90% proficiency around Black Lake Elementary and Black Hills High School (where 88% of the population is white, non-Hispanic). Many other schools in the area around Littlerock (90% white, non-Hispanic) and near Millersylvania State Park (78% white, non-Hispanic) have 85% proficiency.

Tumwater School District has high school proficiency overall. The lowest performing schools in the Tumwater area are around the Olympia airport with 51% proficiency, which is also the area with the highest proportion of Hispanic/Latinx individuals (23% of the population) and fewest homeowners (about 16% homeowners). George Washington Bush Middle School and Peter G. Schmidt Elementary Schools are located in this tract.

The highest performing schools (83-85% proficiency) in Olympia city limits are clustered in southeast Olympia, near LBA park and Ward Lake (includes Centennial Elementary, Margaret McKenny Elementary, NOVA Middle School and Washington Middle School). The tract containing Centennial Elementary School has the highest concentration of people of color and greatest percentage of children living with at least one foreign-born parent within Olympia city limits. The lowest performing schools (47-52% proficiency) in Olympia city limits are on the Westside, clustered around Highway 101 and extending north up Cooper Point Road. This includes southwest Olympia (includes Garfield Elementary), along Black Lake Boulevard and west of Cooper Point Road (includes Julia Butler Hansen Elementary and Thurgood Marshall Middle School). The tract around Garfield Elementary has a population that is 25% people of color. West Olympia has significantly lower homeownership rates, higher rates of housing cost burden, and higher poverty rates than southeast Olympia.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

Thurston County has a slightly lower graduation rate (80.7%) than the statewide graduation rate (82.5%). Alternative schools have lower graduation rates than traditional schools. Not including

alternative schools, Tumwater School District has the highest overall graduation rates, followed by Olympia School District. Tenino has the lowest graduation rate, followed by Rochester.

Graduation and Dropout Rates, Thurston County High Schools, 2021

		Final Cohort Size	Graduate	Dropout	Graduation Rate	Students of Color*	White Students*
District	Traditional Schools						
North Thurston	North Thurston High School	342	294	22	86.0%	53.0%	47.0%
North Thurston	River Ridge High School	336	291	21	86.6%	57.9%	42.1%
North Thurston	Timberline High School	367	332	17	90.5%	50.7%	49.3%
Olympia	Capital High School	311	293	11	94.2%	38.2%	61.8%
Olympia	Olympia High School	434	397	11	91.5%	33.0%	67.0%
Rainier	Rainier Senior High School	39	35	3	89.7%	25.5%	74.5%
Rochester	Rochester High School	144	123	18	85.4%	36.3%	63.7%
Tenino	Tenino High School	72	61	7	84.7%	14.1%	85.9%
Tumwater	A. G. West Black Hills High School	194	177	12	91.2%	31.5%	68.5%
Tumwater	Tumwater High School	286	275	7	96.2%	29.1%	70.9%
Yelm	Yelm High School	359	316	25	88.0%	36.3%	63.7%
District	Non-Traditional Schools						
North Thurston	Envision Career Academy	>10	--	--	--	--	--
Olympia	Avanti High School	41	34	1	82.9%	22.1%	77.9%
Olympia	Olympia Regional Learning Academy	20	16	1	80.0%	33.0%	67.0%
Rochester	H.e.a.r.t. High School	19	16	2	84.2%	20.0%	80.0%
Tumwater	Cascadia High School	36	22	8	61.1%	26.1%	73.9%
Tumwater	New Market High School	48	29	18	60.4%	32.4%	67.6%
Yelm	Yelm Extension	55	29	12	52.7%	37.5%	62.5%

School	Final Cohort Size	Graduate	Dropout	Graduation Rate	Students of Color*	White Students*
Thurston County	3,412	2,752	487	80.7%	39.5%	60.5%
Washington State	84,828	70,009	8,074	82.5%	50.1%	49.9%

Source: OSP⁴⁵

The table below shows students who were experiencing homelessness (at the time of the October 1st count) by school district. North Thurston School District has the greatest number of students experiencing homelessness and proportionally has one of the highest rates of students experiencing homelessness compared to the overall student population. Nearly 4% of students in the Rochester School District experience homelessness. Yelm School District has nearly as many students experiencing homelessness as the Olympia School District, even though it is a much smaller district overall.

Students Experiencing Homelessness, 2021-2022			
District	# homeless students	# total students	% experiencing homelessness
Griffin	7	624	1.1%
North Thurston	480	15,101	3.2%
Olympia	156	9,798	1.6%
Rainier	0	925	0%
Rochester	81	2,105	3.8%
Tenino	26	1,252	2.1%
Tumwater	132	6,500	2%
Yelm	154	5,443	2.8%
Total	1,036	41,748	2.5%

Source: Office of Superintendent of Public Instruction⁴⁶

North Thurston has significantly more staff district-wide who are dedicated to serving students experiencing homelessness (including school-based navigators) through grant funding. As a result, North Thurston School District has a better ability to identify students who are experiencing homelessness, and students in other districts may be under-counted. Under McKinney Vento regulations, schools must provide transportation to school of origin for students experiencing homelessness, who may be staying in shelter outside of district or moving frequently. All schools have a Highly Capable program, rather than only offering in certain schools. These regulations help ensure that students have access to opportunities regardless of where they live or their housing status.

Washington State Legislature follows a prototypical funding model, which means that there is a formula that sets the amount of funding allocated per student. Additional funding is not allotted for students experiencing homelessness. Schools must decide how to spend funds and not enough funds are

⁴⁵ <https://www.k12.wa.us/data-reporting/data-portal>

*Note: student demographics are by school, rather than grade

⁴⁶ <https://www.k12.wa.us/data-reporting/data-portal>

available to meet needs. Local school district staff advised that if the Legislature provided funding following the prototypical school model for students experiencing homelessness, schools could more adequately address the needs of students and ensure more equitable outcomes.

School levies, property taxes, and impact fees from new residential development effects school funding. Areas where development is more difficult, or property values are lower may experience lower funding levels.

Local school district staff also identified high housing costs as a barrier for staff of color. One school employee noted that two colleagues who were women of color left the county at the end of the last school year because housing costs were too high. School salaries are capped by the State Legislature, and do not take local cost of living expenses into account.

One survey respondent who is experiencing housing instability stated: *‘Because of our housing lack of my children are split up and I have a child in North Thurston school district and child in the Olympia school district and finding housing that meets the requirements for both of them and in between for my work has been extremely difficult and hard on our entire family because we cannot afford anything feel safe and enjoy Olympic really we should be able to in our own home as a family that’s why we face the homeless issue and domestic violence has occurred also due to this reason.’*

b. Employment

i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

HUD calculates **Labor Market Engagement** through a combination of factors, including the unemployment rate, labor-force participation rate, and percentage of population ages 25+ and over with at least a Bachelor’s degree by census tract.

HUD’s **Job Proximity** measures the physical distance between place of residence and jobs by race/ethnicity.

The table below shows Labor Market Engagement Index and Job Proximity Index by race and ethnicity for Thurston County and the Olympia area. Olympia is an employment hub, with many state government offices and associated employment sectors. Olympia area residents are closer to job opportunities than Thurston County residents overall. Asian and Pacific Islanders have the highest labor market engagement and proximity to job opportunities. Native Americans have the lowest overall labor market engagement and proximity to job opportunities (both in Thurston County and the Olympia area).

Table 12 - Opportunity Indicators, by Race/Ethnicity

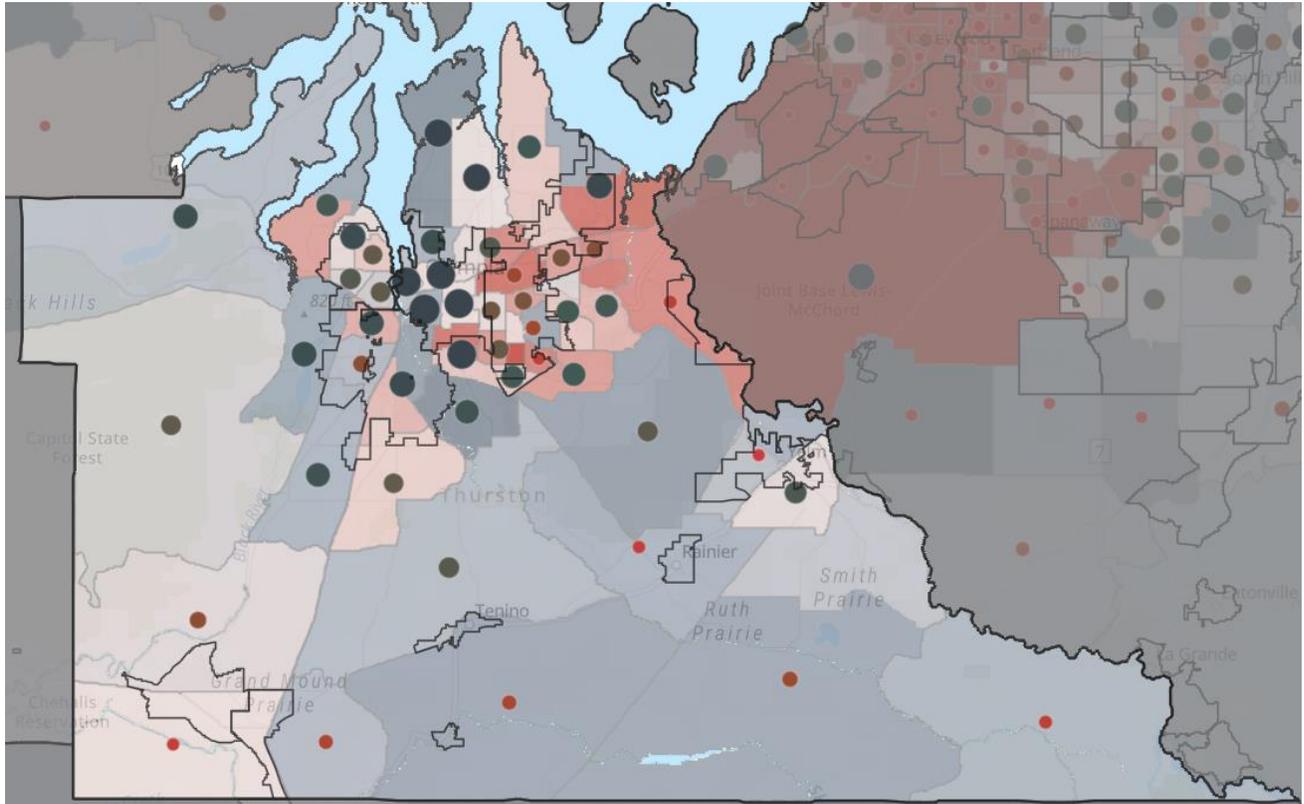
(Thurston County, WA CDBG) Jurisdiction	Labor Market Index	Jobs Proximity Index
Total Population		
White, Non-Hispanic	52.55	37.96
Black, Non-Hispanic	53.40	39.45

Hispanic	50.05	39.02
Asian or Pacific Islander, Non-Hispanic	57.20	44.88
Native American, Non-Hispanic	44.20	36.17
Population below federal poverty line		
White, Non-Hispanic	50.07	39.30
Black, Non-Hispanic	50.39	45.16
Hispanic	50.71	40.49
Asian or Pacific Islander, Non-Hispanic	48.86	49.98
Native American, Non-Hispanic	40.62	36.30
(Olympia-Tumwater, WA) Region		
Total Population		
White, Non-Hispanic	54.27	46.74
Black, Non-Hispanic	53.95	45.90
Hispanic	51.59	46.54
Asian or Pacific Islander, Non-Hispanic	57.36	52.35
Native American, Non-Hispanic	46.34	43.15
Population below federal poverty line		
White, Non-Hispanic	51.62	52.52
Black, Non-Hispanic	51.61	58.92
Hispanic	53.47	58.20
Asian or Pacific Islander, Non-Hispanic	50.11	67.37
Native American, Non-Hispanic	43.10	44.53
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA		
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).		

ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

The map below shows HUD's **Labor Market Engagement** (unemployment rate, labor-force participation rate, and percentage of population ages 25+ and over with at least a Bachelor's degree). Larger and

darker shaded dots indicate higher Labor Market Engagement. Race/ethnicity is indicated in color shading by census tract (gray indicates higher proportion of white/non-Hispanic individuals and red indicates higher proportion of people of color).



The lowest labor market engagement is in the South County in the areas around Yelm, Rainier, Bucoda, and Rochester. The South County areas are predominantly white, non-Hispanic.

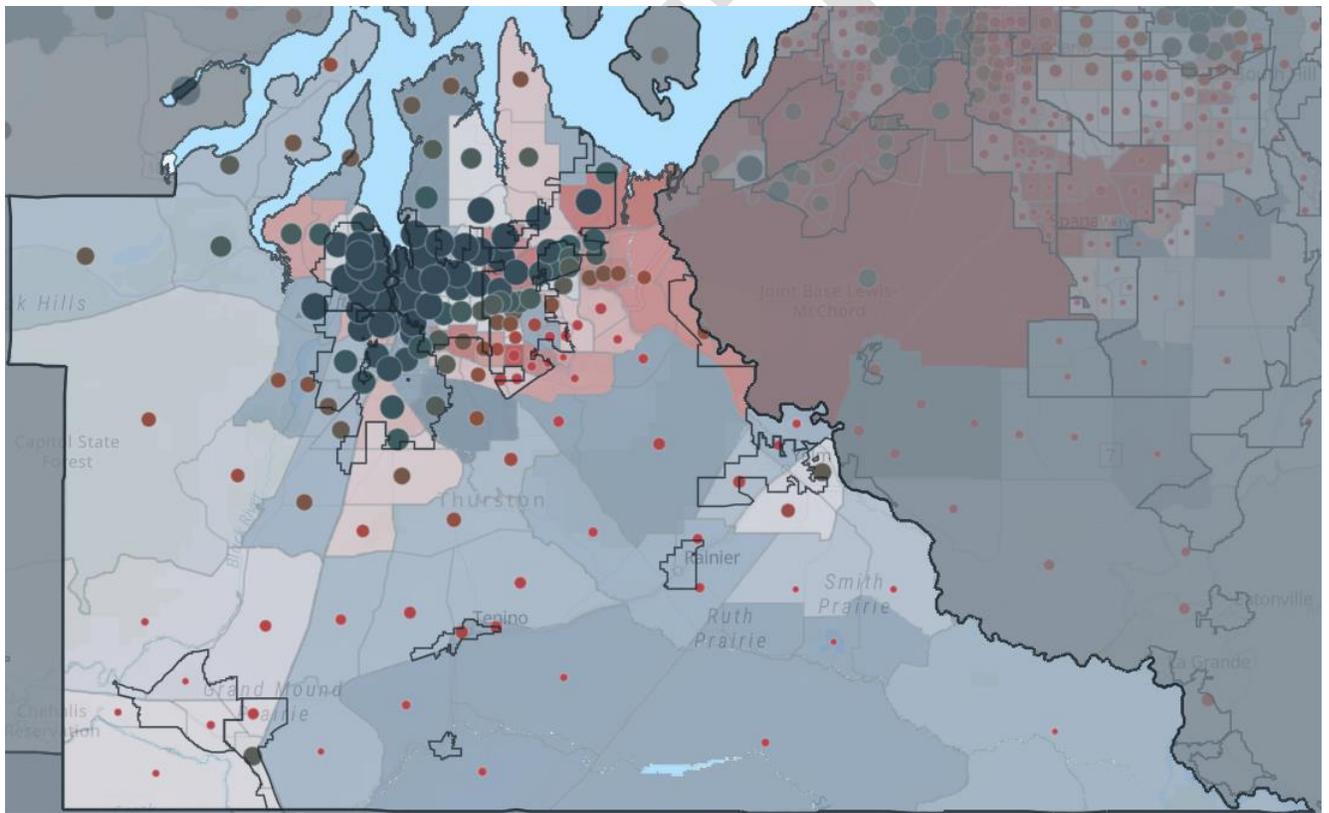
The Nisqually reservation and a few pockets of Lacey (tracts surrounding St. Martin's University, Timberline and Puget Sound High Schools) also indicate low labor market engagement. These tracts also contain the highest concentrations of Native American individuals and Native Hawaiian or Pacific Islanders (just south of Timberline High School near the Amtrak station). The area around St. Martin's University is about 36% people of color, not including white, Hispanic/Latinx individuals (17.3% Hispanic/Latinx, 10.9% Black/African American, 6.5% Asian, 5.2% two or more races, and 2.7% Native Hawaiian or other Pacific Islander).

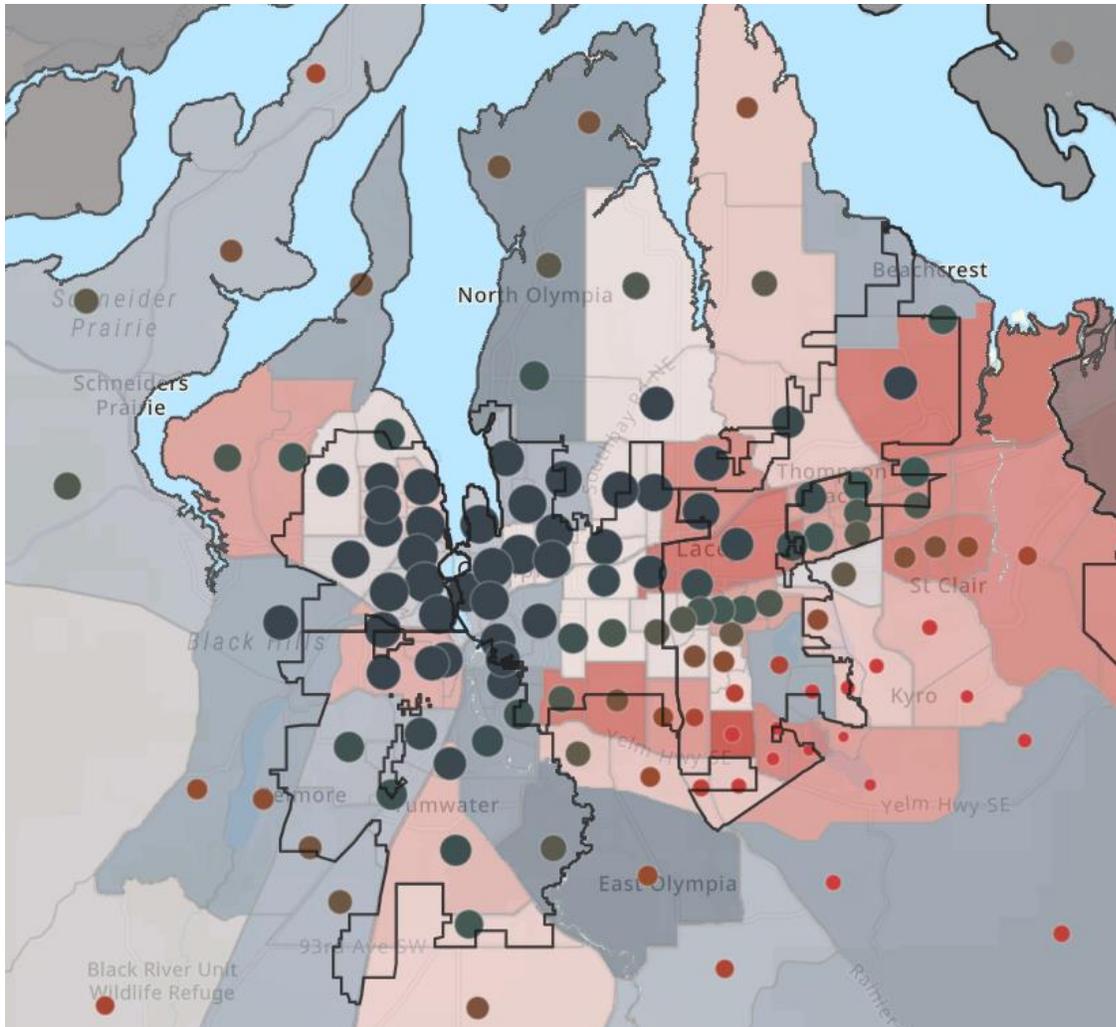
The highest labor market engagement is in and around the Olympia core (downtown Olympia, southeast Olympia, northeast Olympia). Outside Olympia city limits, the highest labor market engagement is in the Boston Harbor peninsula, around Yelm Highway by Wilderness and Ward Lake, and north of I-5 in the Hawks Prairie industrial area. Olympia is home to many state government agencies, clustered around the Capitol Campus near downtown. While Olympia has roughly 18% of the county's population, it holds 39% of the county's jobs, and 33% of those jobs are in state or local government.⁴⁷ The Hawks Prairie

⁴⁷ Source: TRPC Population and Employment Forecast (2018 Update)

industrial area has undergone tremendous growth in the past ten years, adding several distribution warehouses, medical and other facilities, as well as multifamily residential units. While Boston Harbor, southeast and northeast Olympia are predominantly white, non-Hispanic, the area around Wilderness and Ward Lake is the most diverse tract in Olympia city limits (58% white, non-Hispanic, 18.4% Asian, 7.9% Black/African American, 7.8% Hispanic/Latinx, 7.3% two or more races, .6% American Indian/Alaska Native). The tract north of I-5 near Hawks Prairie is over 36% people of color (57.7% white/non-Hispanic, 21.1% Asian, 9.9% two or more races, 9.1% Hispanic/Latinx, 2.2% Black/African American).

HUD's **Job Proximity** measures the physical distance between place of residence and jobs by race/ethnicity. The maps below show Job Proximity. Larger and darker shaded dots indicate there are more jobs close by. Race/ethnicity is indicated in color shading by census tract (gray indicates higher proportion of white, non-Hispanic individuals and red indicates higher proportion of people of color).





Job proximity measures much higher around the I-5 corridor in the urban parts of the county (particularly around downtown Olympia), while the South County shows people must travel further distances to job opportunities. For comparison, the area with the highest score of 99 is located in southwest Olympia by Capitol Mall, while the area with the lowest score of 0 is located in the SE corner of the county (around the Bald Hills).

Areas with high labor market engagement but lower job proximity (such as Boston Harbor and the area by Tolmie State Park) indicate that individuals commute further to their jobs, but still experience high levels of employment, college education and labor force participation.

The lowest job proximity scores in the urban part of the county are in south Lacey, where there are higher concentrations of people of color (around Rainier Vista Community Park and just north of the Amtrak station). There is also lower labor engagement in unincorporated Thurston County, east of Lacey around Lake St. Clair.

Generally, people of color, born outside the U.S. or with Limited English Proficiency are located near job opportunities in the urban core. South Lacey is one area for potential investment to increase access to economic opportunity.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

The table below shows employment status by jurisdiction for people with and without disabilities.⁴⁸

EMPLOYMENT STATUS	Thurston County		Olympia	
	With a Disability	Without a Disability	With a Disability	Without a Disability
Employed	25.6%	64.9%	28.9%	66.0%
Not in Labor Force	70.0%	31.4%	62.2%	30.4%

Source: ACS 2016-2020 5-Year Estimates

The City of Olympia is currently creating an economic resiliency plan (**Olympia Strong**), which will be completed mid-2023. A few key findings from this stage of research and community engagement:

- There are opportunities to extend workforce options to people with disabilities
- There are opportunities to address challenges faced by disconnected youth (there are a growing number of youth ages 16-19 who are not in school, not high school graduates and unemployed or not in the labor force)
- Affordable housing is a key concern for both employers and workers (workers have trouble affording housing with current wages and employers worry that their employees will not be able to live close to work)

Thurston Strong, a collaborative effort between local government and community organizations, was initiated to respond to the impacts of the COVID-19 pandemic. Thurston Strong created information portals to connect businesses and workers with resources, distributed over \$6M in grant funding in the second half of 2020 (including intentional allocations for women and minority owned enterprise), and created childcare provider grants and training to help parents return to work.

The Thurston Strong Task Force also created a 24-month plan, that includes strategies for each of the following overarching goals:

Inclusive Economy

- Creating economic opportunity for all, inclusive of all socioeconomic tapestries, genders, races and geographies

Economic Resiliency

- Ensuring existing and future businesses and employers are better prepared for future crises, and have access to resources that help

Economic Expansion

⁴⁸ ACS 2016-2020:
https://data.census.gov/cedsci/table?q=Disability&g=0500000US53067_1600000US5351300&y=2020&tid=ACSST5Y2020.S1811

- Leveraging information and partners to grow economic opportunity the community supports and also provides living-wage employment

The Task Force is developing strategies to rebuild a more inclusive economy rather than a “return to normal.” This includes informing the public, private sector, government, and philanthropists on the value of creating higher-quality and racially inclusive businesses and policy that reflects better than normal. Under the ***Inclusive Economy*** goal, the following initiatives were identified:

- Establish and invest in childcare as a critical economic development strategy, including better training for childcare business operations
- Create a minority business development advisory council and expand partnerships with minority business advocates
- Support development and operations at the proposed community cultural center
- Increase awareness of and participation in Women’s Business Center training programs
- Pursue place-based economic development strategies that stimulate opportunity in vulnerable census districts
- Research, adopt and promote data indicators and actions that track and facilitate inclusive economy goals (emphasis on reducing poverty per State “10-Year Plan to Dismantle Poverty”)
- Recruit or establish a local CDFI lender and increase access to start up and expansion capital for underfunded entrepreneurs
- Resume the Education to Financial Stability Task Force
- Facilitate career pathway opportunities through partnerships with SPSCC, The Community Foundation and other workforce nonprofits

Another subgoal under the ***Economic Expansion*** goal is to be proactive in addressing workforce housing labor challenges.

BIPOC Business Roundtable: The Thurston County Chamber Foundation partners with South Sound BIPOC (ssBIPOC) to support businesses owned by Black, Indigenous, and People of Color (BIPOC) in Thurston County. The Chamber helps provide visibility and marketing, distributes information on training and grants to ssBIPOC members, and offers a business incubator space reserved for BIPOC owned businesses.

c. Transportation

i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

In Thurston County’s urban areas, Intercity Transit oversees the regional transportation systems, as well as regular bus service between Yelm and the urban core. A majority of the overall population lives in the urban areas where there is greater access to transit routes, while the rural areas have limited transportation services. Intercity Transit bus accessibility features include (but are not limited to): ramps, “kneeling” feature to lower the first step, reserved spaces for mobility devices, language interpretation and translation, bus schedules in large print, Braille, and audio tape formats.

Intercity Transit has additional programs to meet community needs, including:

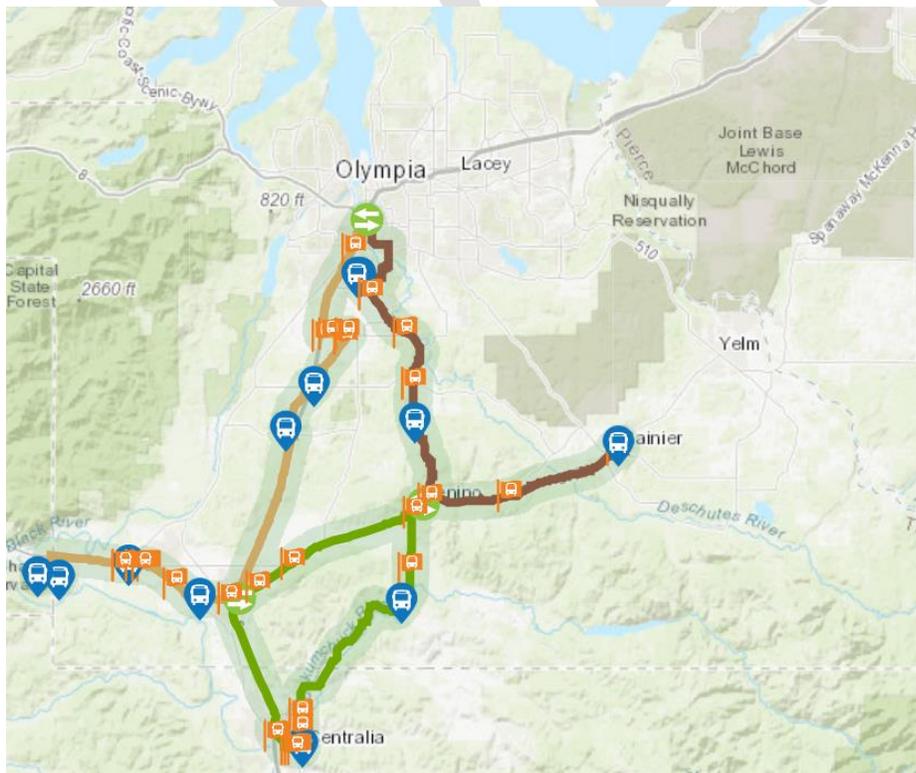
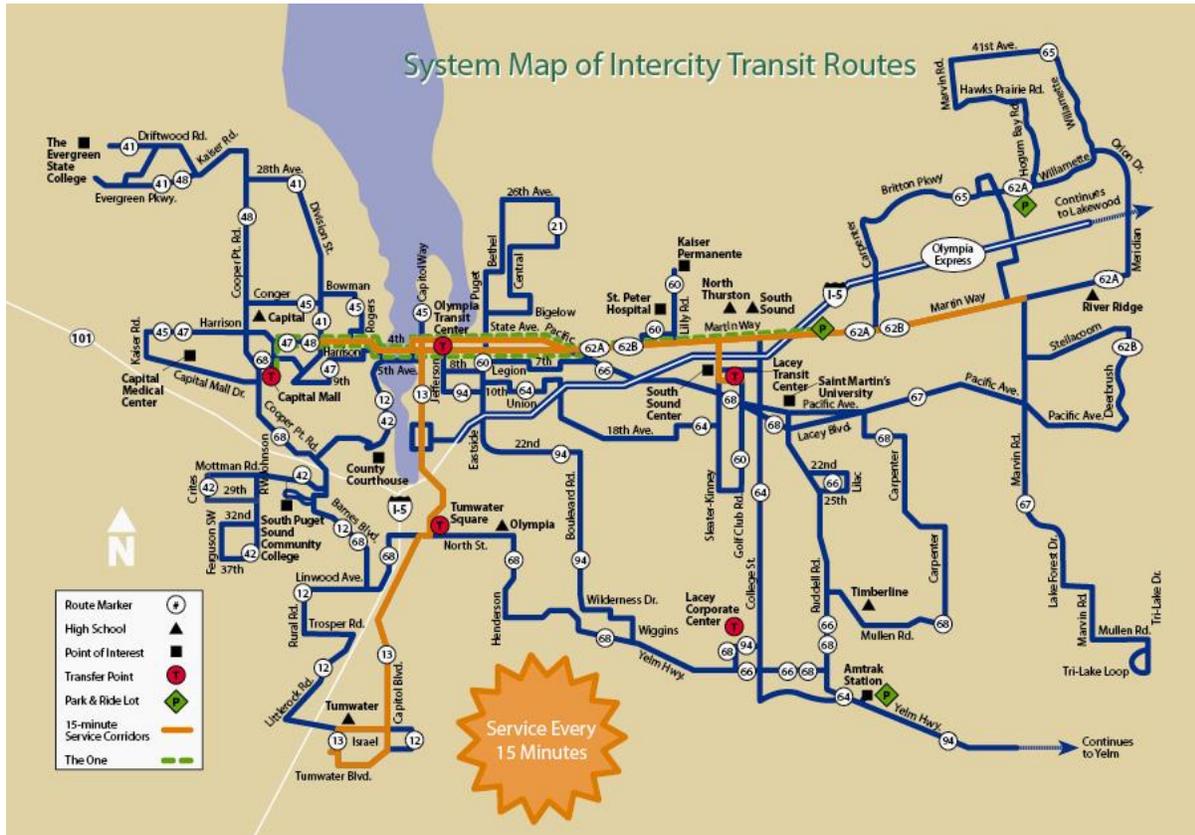
- Dial-A-Lift is a door-to-door, shared ride public transportation service for people with disabilities.
- Village Vans provides free transportation for employment-related activities to people with low incomes in the Olympia, Lacey, and Tumwater greater urban areas. This includes but is not limited to: a new job, job interviews, job training, WorkSource Center, DSHS, and childcare centers. The Village Vans Driver Training and Job Skills Program is a free, professional training program, which offers on-the-job driving experience, as well as help with: interview practice, resume and cover letter writing, computer skills, communication skills and other skills.
- Vanpool to help people carpool to work.
- Bus buddy program where an experienced bus rider provides 1-on-1 assistance to a new bus rider.

Rural Transit, operated by the TRPC, offers four transit routes that link South County areas with Intercity Transit routes in Thurston County and Twin Transit routes in neighboring Lewis County. These routes provide connections between Rochester, the Confederated Tribes of the Chehalis Reservation, Tenino, Bucoda, and Rainier. Rural Transit operates Monday through Friday from 6:00am to 6:00pm. Many routes run every two hours, however, one route runs hourly. Stops are limited, however, Rural Transit will deviate its route by up to three-quarters ($\frac{3}{4}$) of a mile to accommodate riders and provides complementary Paratransit service within $\frac{3}{4}$ mile of our regular routes. Veterans who are traveling to access services in Centralia may request direct, no transfer service from Rural Transit.

Nisqually Transit is operated by the Nisqually Indian Tribe. Shuttle routes are between the Tribal Center (Upper Reservation) and Youth Center (Lower Reservation) areas on weekdays from 6:00am to 6:00pm. Nisqually Transit also provides free rides (as far as Yelm and Hawks Prairie) beyond the fixed route on weekdays from 6:00am to 6:00pm by request. Nisqually Transit offers connections with services from Intercity Transit and Rural Transit.

Intercity Transit, Rural Transit, and Nisqually Transit all offer no cost services.

Below are system maps for Intercity Transit and Rural Transit routes.



The Transit Index in HUD Table 12 shows who is more or less likely to utilize the public transportation. The lower the transit index, the less likely to use public transit. How often families actually use public transportation is a general indication of how readily available public transit is in the jurisdiction and region.

Rates of public transit use are higher in general in Olympia, where there is more public transportation available. Rates of public transit use are similar among racial/ethnic groups except among individuals who have income below the federal poverty line. Use of public transportation increases for Black/African American individuals, while it decreases for Native American individuals (in both Olympia and Thurston County). Black/African American individuals in Olympia with income below the federal poverty level are the most likely to use public transportation, with a score of 64.96. Native Americans in Thurston County are least likely to use public transportation, with a score of 42.86. There is one major Intercity transit bus route from the urban core to the Nisqually Reservation, with a stop at the Red Wind Casino. Route 94 runs hourly from about 6:00am to 10:00pm.

The **Low Transportation Cost Index** in HUD Table 12 measures cost of transport and proximity to public transportation by neighborhood. The higher the index the lower the cost. Additionally, the **Transit Trips Index** measures how often low-income families in a neighborhood use public transportation. The higher the index the more likely residents of a neighborhood will access public transportation.

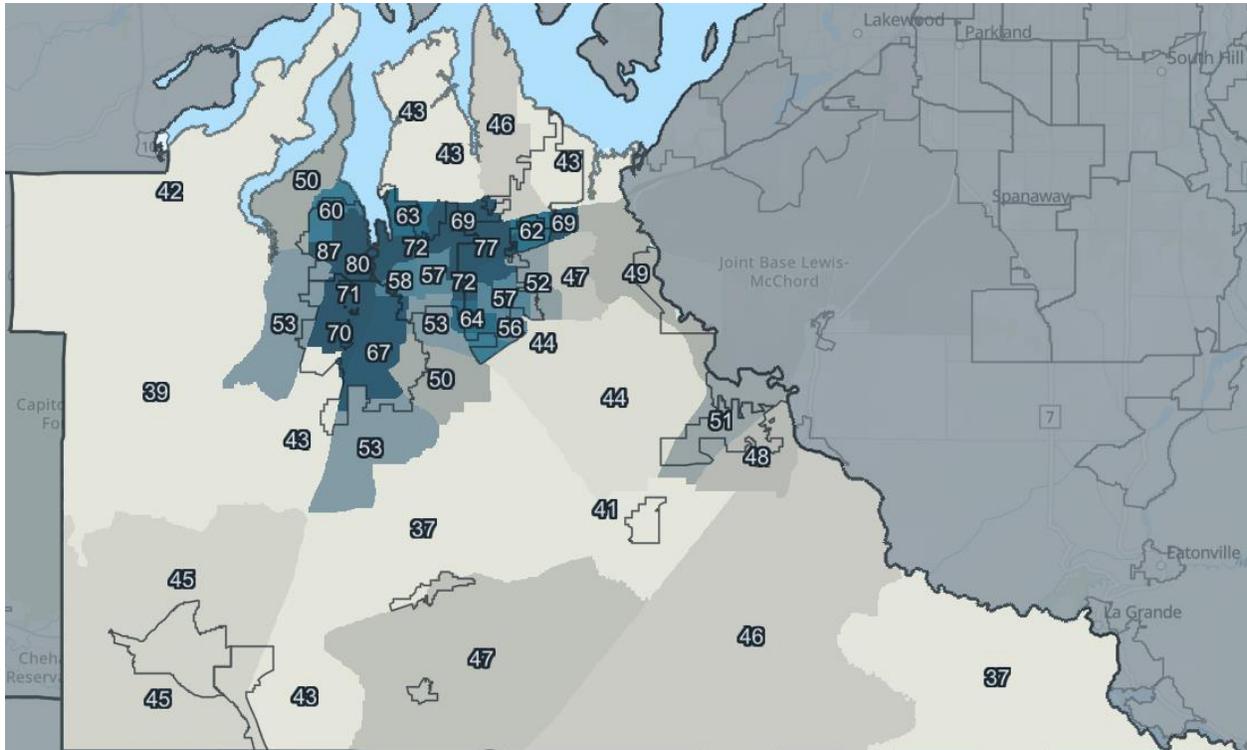
White, non-Hispanic and low-income Native American individuals have higher transportation costs and less proximity to public transportation. Black/African American and Asian or Pacific Islander individuals have lower transportation costs and greater proximity to public transportation.

Table 12 - Opportunity Indicators, by Race/Ethnicity		
(Thurston County, WA CDBG) Jurisdiction	Transit Index	Low Transportation Cost Index
Total Population		
White, Non-Hispanic	51.32	51.92
Black, Non-Hispanic	52.67	55.20
Hispanic	52.21	54.01
Asian or Pacific Islander, Non-Hispanic	52.99	55.25
Native American, Non-Hispanic	52.56	52.14
Population below federal poverty line		
White, Non-Hispanic	52.13	54.28
Black, Non-Hispanic	59.00	59.48
Hispanic	51.91	52.89
Asian or Pacific Islander, Non-Hispanic	49.96	56.32
Native American, Non-Hispanic	42.86	51.81
(Olympia-Tumwater, WA) Region		
Total Population		
White, Non-Hispanic	55.17	55.07
Black, Non-Hispanic	55.41	57.37
Hispanic	55.48	56.62
Asian or Pacific Islander, Non-Hispanic	56.76	57.94
Native American, Non-Hispanic	55.27	54.58
Population below federal poverty line		
White, Non-Hispanic	57.83	59.50
Black, Non-Hispanic	64.96	64.56
Hispanic	60.16	60.24
Asian or Pacific Islander, Non-Hispanic	59.96	63.57
Native American, Non-Hispanic	47.46	54.94
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA		
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).		

ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

The map below shows HUD’s Low Transportation Cost Index. The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. The higher the index the lower the cost. In this map, higher values and darker shading indicate lower transportation costs and proximity to public transportation. The map shows that residents in the urban core have lower

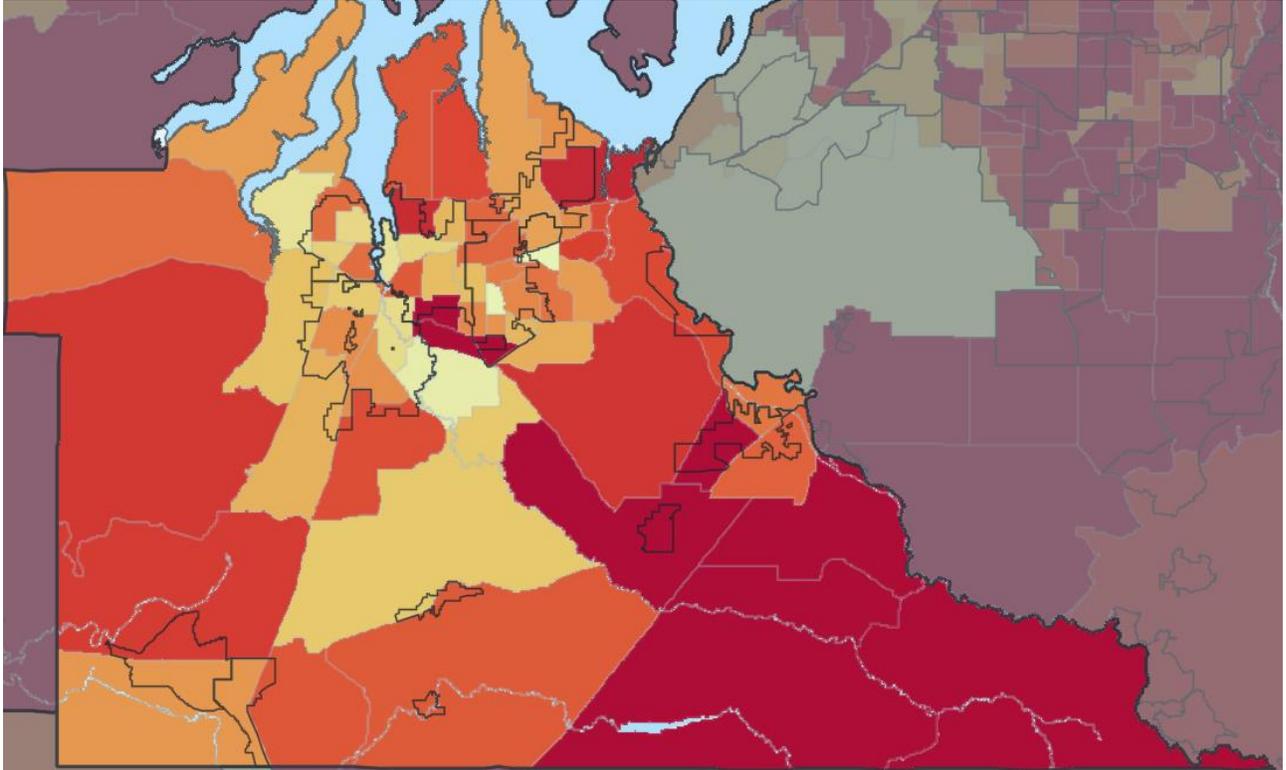
transportation costs and are closer to public transit than South County residents. As indicated in Table 12 earlier, white, non-Hispanic and Native American individuals have the highest transportation costs and lowest proximity to public transportation. South County is primarily white, non-Hispanic and areas surrounding both the Chehalis and Nisqually reservations have less access to public transit and higher transportation costs. It is worth noting that the area around Billy Frank Jr. Wildlife Refuge also has low access to public transit and higher transportation costs. This tract has a high concentration of people of color and people born outside the U.S. Tracts in West Olympia have the lowest transportation costs and greatest access to public transit.



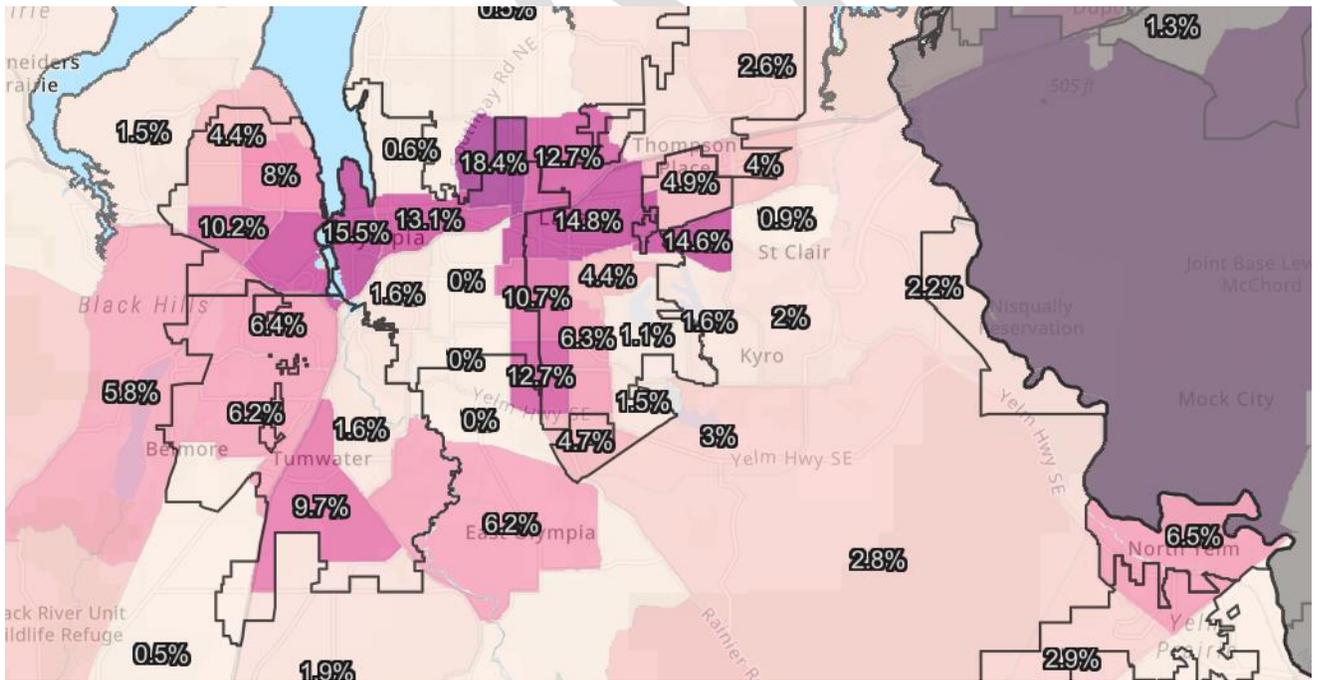
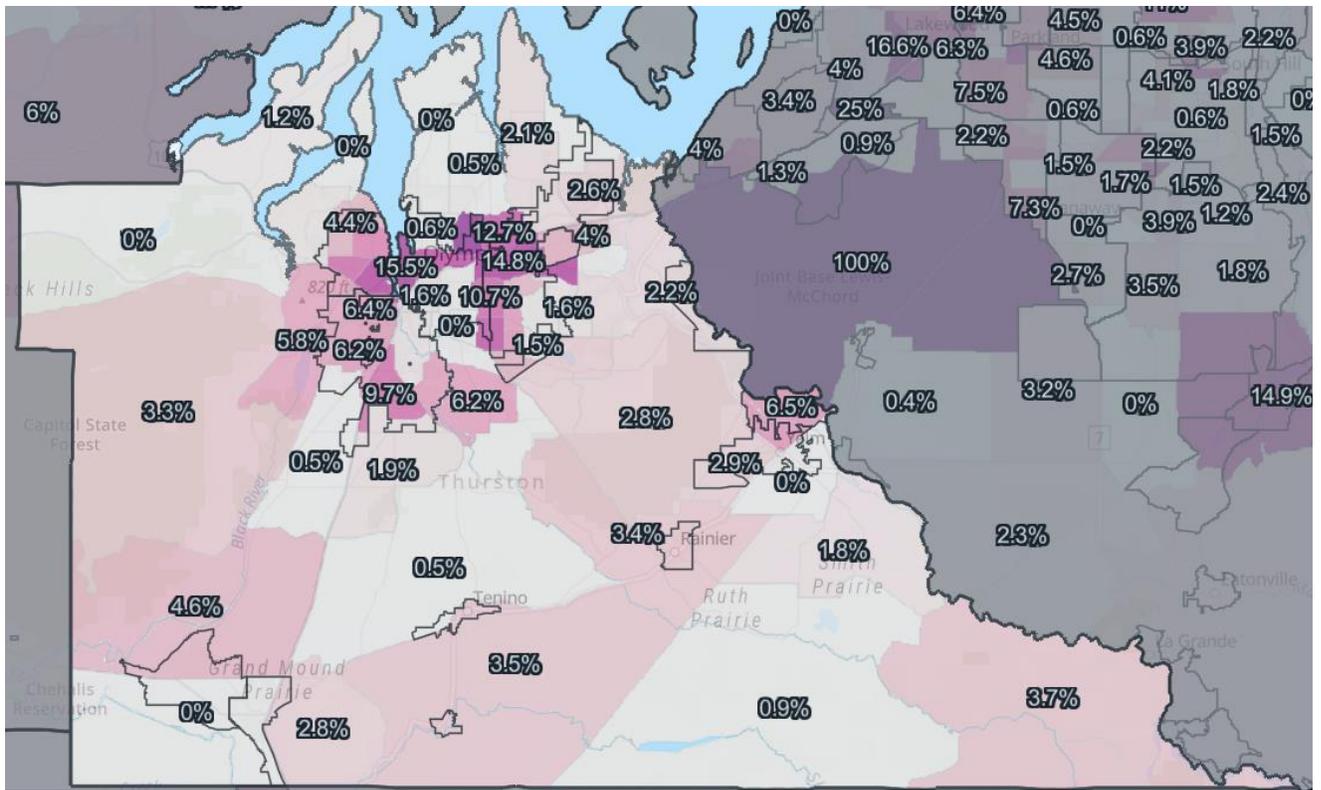
The maps below show percent of commuters living in rental households using transit for their journey to work. About 18% of renters in northeast Olympia (south of Squaxin Park) use public transit to commute to work. This tract is 86% white, non-Hispanic and has a 78% homeownership rate.

In the area east of the Amtrak station around Pattison Lake, 14% of renters use public transit to commute to work. This tract is 74.3% white, non-Hispanic and 25.7% people of color (15.4% Hispanic/Latinx, 6.8% Asian, 4.7% Native Hawaiian or other Pacific Islander, 4.3% Black/African American, 4.1% two or more races, 0.9% American Indian or Alaska Native, and 0.4% some other race).

The maps below show percent of workers whose commute was 90 minutes or more. Darker shading indicates a greater proportion of the population with a commute time over 90 minutes. Areas of the South County experience longer commute times, particularly around the Bald Hills area where about 10% of workers have a commute over 90 minutes. In the urban areas of the county, about 7-8% of residents in the tracts along Yelm Highway in Olympia and unincorporated Thurston County have a 90 minute or greater commute.



The map below shows percent of households with no vehicle available. In the South County, North Yelm and North Rochester residents have least access to a vehicle. In North Yelm, 6.5% of households do not have access to a vehicle. In the urban areas of the county, the greatest number of households with no access to a vehicle reside around Providence St. Peter Hospital. In this tract, 18.4% of households do not have access to a vehicle. One-person households make up the bulk of households with no access to a vehicle in this tract. This area has a high rate of people with disabilities and people born outside the U.S. It is worth noting that in the tract surrounding Rainier Vista Community Park, there are more family households (3-person or greater) with no access to a vehicle. Out of an estimated 97 households with no vehicle in this tract, 86 are households with 3 or more people. This area has the highest concentration of people of color in Thurston County.



iii. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

According to the AFH online survey, 79 respondents who have a disability (or have a family member in their household with a disability) indicated they have difficulty accessing transportation near where they live. Disability community advocates stated there could be system improvements around pick-ups and drop-offs, rural routes should be more flexible to meet needs of riders, and there is a need for sidewalks, curb cuts, lighting, and covered bus stops to protect riders from the elements.

People with disabilities more frequently utilize alternative forms of transportation (such as public transit or carpooling), or work from home than individuals who do not have disabilities. The table below shows commuting patterns among people with disabilities and without disabilities by jurisdiction.

COMMUTING TO WORK	Thurston County		Olympia	
	With a Disability	Without a Disability	With a Disability	Without a Disability
Workers Age 16 and Over	8,741	119,111	2,049	23,161
Car, truck, or van - drove alone	69.3%	76.9%	54.0%	71.8%
Car, truck, or van - carpoled	11.6%	9.3%	12.0%	10.7%
Public transportation (excluding taxicab)	4.0%	1.8%	8.6%	3.2%
Walked	3.5%	1.9%	5.4%	3.8%
Taxicab, motorcycle, bicycle, or other means	1.6%	1.9%	1.3%	2.6%
Worked from home	10.1%	8.2%	18.8%	7.9%

Source: ACS 2016-2020 5-Year Estimates⁴⁹

Thurston Regional Planning Council (TRPC) conducted a community survey as part of their ‘Coordinated Human Services Transportation Plan for the Thurston Region’⁵⁰ in 2021. A total of 4,190 people responded to the general survey and 499 students from the Olympia and Yelm school districts participated in the student survey.

Some key findings of the survey:

- People with a disability affecting mobility and those with a household income less than \$35,000 are more likely to use transit as a transportation option at least one day a week than the general public.

⁴⁹https://data.census.gov/cedsci/table?q=Disability&g=0500000US53067_1600000US5351300&y=2020&tid=ACSS T5Y2020.S1811

⁵⁰ <https://www.trpc.org/DocumentCenter/View/11455/Coordinated-Human-Services-Transportation-Plan---November-2022>

- 12% of people have trouble getting from home to shopping or other places like medical appointments and errands. When student survey responses were included, this increased to 14%.
- 28% of people 24 or younger have trouble getting from home to shopping or other places like medical appointments and errands. This compares to just 11% of people 25-54 and 10% of people 55 or older.
- 30% of people with a disability affecting their mobility have trouble getting from home to shopping or other places like medical appointments and errands. This compares to just 12% of the general survey respondents.
- 35% of respondents with a household income less than \$35,000 have trouble getting from home to shopping or other places like medical appointments and errands. This compares to just 12% of respondents with a household income between \$35,000 and \$75,000 and 4% of respondents with a household income of \$75,000 or more.
- 7% of respondents have trouble finding a job or a better job due to their transportation options.
- 41% of respondents 24 or younger have trouble finding a job or a better job due to their transportation options. This compares to just 11% of respondents 25-54 and 3% of respondents 55 or older.
- 13% of respondents with a disability affecting their mobility have trouble finding a job or a better job due to their transportation options.
- 19% of respondents with a household income less than \$35,000 have trouble finding a job or a better job due to their transportation options. This compares to just 7% of respondents with a household income between \$35,000 and \$75,000 and 4% of respondents with a household income of \$75,000 or more.

One of the key goals of the 'Coordinated Human Services Transportation Plan for the Thurston Region' is Barrier-Free Transportation to ensure transportation system investments support the special travel needs of youth, elders, people with disabilities, literacy, or language barriers, those with low incomes, and other affected groups. Another key goal is to increase mobility options by expanding service to rural areas with limited mobility options; support training and employment in the urban areas; and provide transport to specialized services not available in the Thurston Region.

The Regional Transportation Plan was adopted by the Thurston Regional Planning Council, with the goal to ensure transportation system investments support the special travel needs of youth, elders, and people with disabilities, literacy or language barriers, and those with low incomes. Out of this, programs such as Rural & Tribal Transportation (RT), Thurston County Bus Buddies, and Intercity Transit Village Vans have improved the lives of many people in the Thurston Region. Most every day, these services transport people to jobs, training, essential services, and other important destinations.

In addition to the Rural & Tribal Transportation Program (RT) and Village Vans – initiatives of the regional coordination process – other traditional and nontraditional providers serve Thurston County. Intercity Transit delivers a backbone of fixed route and dial-a-lift (DAL) service in the urban areas of Olympia, Lacey, Tumwater and Yelm, and partners on programs outside its service areas. Social service providers transport certain clients for certain types of trips – filling some gaps.

Developed by the Thurston Regional Planning Council, the website Thurstonheretothere.org helps people who live in and around Thurston County try alternative ways to travel around the community.

The site lists travel options for bus, carpooling, walking and more, with maps, resources specific to K-12, Military, persons with disabilities, and senior services. It also provides a travel calculator and information for State employees as part of the 1991 Commute Trip Reduction law.

The [Martin Way Corridor Study](#) is a partnership between TRPC, Intercity Transit, Thurston County, and the cities of Olympia and Lacey. It specifically looks at the vision for the Martin Way corridor (mixed use corridor where people enjoy walking, shopping, working, and living) and the barriers to achieving that vision. One key goal from the study is to develop affordable housing at several points along the corridor. The study created a vision for future development that will include safety improvements for walking, biking, and transit access, and will make it easier for people with disabilities to get around. Other priorities include landscaping and improved connections with nearby services and amenities to enhance a sense of community, as well as retention and development of businesses.

d. Access to Low Poverty Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

HUD’s **Low Poverty Index** measures concentration of poverty by neighborhood. A lower value on the index indicates that members of the protected group are more likely to live in a neighborhood with higher concentrations of poverty. The table does not indicate rates of poverty by race/ethnicity, but rather the ability to live in neighborhoods with low rates of poverty by race/ethnicity.

HUD’s Low Poverty Index shows that Native American individuals are most likely to live in neighborhoods with higher concentrations of poverty, both in Olympia and Thurston County. The table also shows that, in general, Asian or Pacific Islander individuals are least likely to live in neighborhoods with high rates of poverty. However, for Asian or Pacific Islanders who earn wages below the federal poverty level, the likelihood of living in a neighborhood with high rates of poverty increases significantly. This may indicate that Asian or Pacific Islanders earning wages below the poverty level may experience more segregation and are more likely to live in areas with greater concentrations of poverty.

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Thurston County, WA CDBG) Jurisdiction	Low Poverty Index
Total Population	
White, Non-Hispanic	60.95
Black, Non-Hispanic	61.80
Hispanic	57.83
Asian or Pacific Islander, Non-Hispanic	63.47
Native American, Non-Hispanic	51.97

Population below federal poverty line	
White, Non-Hispanic	56.78
Black, Non-Hispanic	62.22
Hispanic	60.53
Asian or Pacific Islander, Non-Hispanic	48.20
Native American, Non-Hispanic	48.64
(Olympia-Tumwater, WA) Region	
Total Population	
White, Non-Hispanic	57.80
Black, Non-Hispanic	58.72
Hispanic	54.94
Asian or Pacific Islander, Non-Hispanic	59.64
Native American, Non-Hispanic	50.49
Population below federal poverty line	
White, Non-Hispanic	50.49
Black, Non-Hispanic	53.94
Hispanic	49.33
Asian or Pacific Islander, Non-Hispanic	42.88
Native American, Non-Hispanic	45.12

Table 12 - Opportunity Indicators, by Race/Ethnicity	
(Thurston County, WA CDBG) Jurisdiction	Low Poverty Index
Total Population	
White, Non-Hispanic	60.95
Black, Non-Hispanic	61.80
Hispanic	57.83
Asian or Pacific Islander, Non-Hispanic	63.47
Native American, Non-Hispanic	51.97
Population below federal poverty line	
White, Non-Hispanic	56.78
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Hispanic	60.53
Asian or Pacific Islander, Non-Hispanic	48.20
Native American, Non-Hispanic	48.64
(Olympia-Tumwater, WA) Region	
Total Population	
White, Non-Hispanic	57.80
Black, Non-Hispanic	58.72
Hispanic	54.94
Asian or Pacific Islander, Non-Hispanic	59.64
Native American, Non-Hispanic	50.49
Population below federal poverty line	
White, Non-Hispanic	50.49
Black, Non-Hispanic	53.94
Hispanic	49.33
Asian or Pacific Islander, Non-Hispanic	42.88
Native American, Non-Hispanic	45.12
<p>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</p> <p>Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).</p>	

In 2020, nearly 10% of Thurston County’s population and nearly 15% of Olympia’s population had income below the federal poverty level. Olympia experiences higher rates of people living below the poverty level than Thurston County across all the measures listed below.

In Thurston County, rates of poverty are highest among single female heads of households (20%), individuals with disabilities (16%), and individuals categorized as ‘some other race’ than those listed below (18%). In Olympia, 15% of children live below the poverty line and 28% of single female heads of households lived below the poverty level. Nearly 23% of individuals with disabilities in Olympia live below the federal poverty level. Nearly 18% of individuals in Olympia and 15% of individuals in Thurston County who are born outside the U.S. have income below the federal poverty level.

Between 2015 and 2020, poverty decreased among many groups, however, it increased among Asian community members in both Thurston County and Olympia. Poverty rates among the Asian population remain among the lowest in comparison to other people of color. In both Thurston County and Olympia, rates of poverty are highest among Black or African American, Native Hawaiian or other Pacific Islander, and individuals of some other race. In Olympia, poverty increased significantly over 5 years (0% to 21%) among Native Hawaiian and other Pacific Islanders. However, Olympia’s population of Native Hawaiian and other Pacific Islanders also increased 600% (from .1% to .7%) between 2010 and 2020. Poverty rates decreased most significantly for Native American individuals from 2015 to 2020. The overall Native American population remained stable in Olympia between 2010 to 2020 and decreased about 14% countywide.

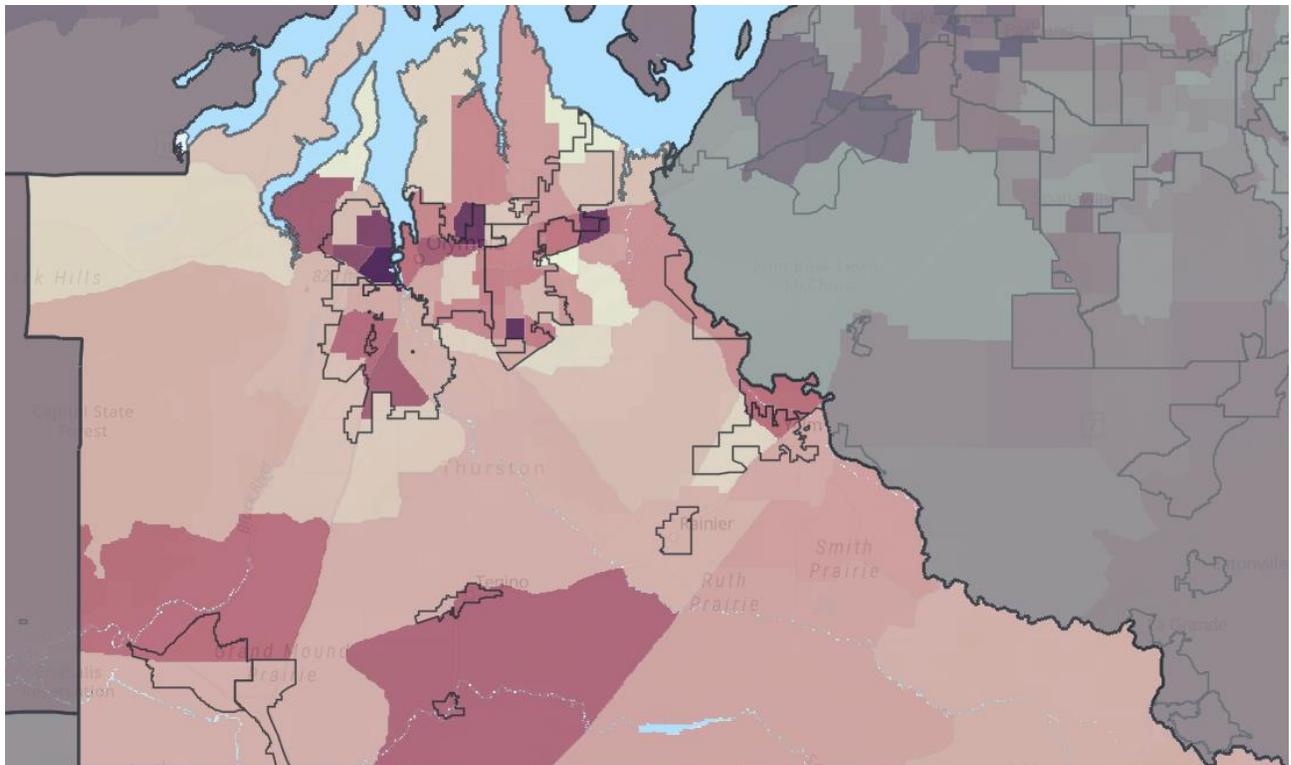
	Thurston County			Olympia		
	2020 % of population below federal poverty level	2015 % of population below federal poverty level	% Change from 2015-2020	2020 % of population below federal poverty level	2015 % of population below federal poverty level	% Change from 2015-2020
TOTAL	9.8%	12.4%	-2.6%	14.7%	17.7%	-3.0%
SEX						
Male	9.1%	11.5%	-2.4%	14.2%	17.2%	-3.0%
Female	10.5%	13.3%	-2.8%	15.1%	18.1%	-3.0%
AGE						
Under 18 years	11.4%	16.4%	-5.0%	15.0%	21.8%	-6.8%
Related children of householder under 18 years	11.1%	16.0%	-4.9%	14.5%	21.5%	-7.0%
18 to 64 years	10.3%	12.2%	-1.9%	16.5%	18.1%	-1.6%
65 years and over	6.1%	6.9%	-0.8%	7.9%	9.7%	-1.8%

	Thurston County			Olympia		
	2020 % of population below federal poverty level	2015 % of population below federal poverty level	% Change from 2015-2020	2020 % of population below federal poverty level	2015 % of population below federal poverty level	% Change from 2015-2020
RACE AND HISPANIC OR LATINO ORIGIN						
White alone, not Hispanic or Latino	8.8%	10.6%	-1.8%	13.7%	16.5%	-2.8%
Black or African American	15.5%	15.3%	0.2%	21.6%	23.4%	-1.8%
American Indian or Alaska Native	14.7%	29.4%	-14.7%	18.7%	32.4%	-13.7%
Asian	12.2%	10.9%	1.3%	13.9%	11.2%	2.7%
Native Hawaiian or Other Pacific Islander	15.6%	16.2%	-0.6%	21.0%	0.0%	21.0%
Some other race	17.9%	18.4%	-0.5%	27.4%	34.1%	-6.7%
Two or more races	10.3%	18.9%	-8.6%	17.2%	29.9%	-12.7%
Hispanic or Latino origin (of any race)	14.0%	23.1%	-9.1%	17.2%	27.2%	-10.0%
LIVING ARRANGEMENT						
In family households	8.0%	10.2%	-2.2%	10.7%	13.0%	-2.3%
In married-couple family	4.8%	5.2%	-0.4%	5.6%	7.6%	-2.0%
In Female householder, no spouse present households	19.9%	29.2%	-9.3%	28.1%	28.4%	-0.3%
In other living arrangements	18.0%	22.4%	-4.4%	23.3%	29.0%	-5.7%
NATIONAL ORIGIN AND CITIZENSHIP STATUS						
Born in U.S.	9.4%	12.2%	-2.8%	14.3%	17.7%	-3.4%
Foreign born	15.1%	14.9%	0.2%	17.9%	17.4%	0.5%
Naturalized citizen	11.9%	11.3%	0.6%	13.0%	11.2%	1.8%
DISABILITY STATUS						
With a disability	15.8%	15.9%	-0.1%	22.8%	27.9%	-5.1%
No disability	9.0%	12.1%	-3.1%	13.4%	16.5%	-3.1%

ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.

The map below shows percent of population whose income in the past 12 months is below the federal poverty level. Darker shading indicates higher rates of poverty. Nationally, on average 13% of the population has income below the federal poverty level.

Income below federal poverty level



The highest rate of poverty (26.8% of the population) is located in southwest Olympia between Black Lake Boulevard and Capitol Lake. Of the individuals living below the poverty line in this tract, about 74% are adults between the ages of 18 and 59. This tract has a higher rate of children, comprising about 18% of the population. About 32% of children in this tract are living below the federal poverty line. About 88% of residents in this tract are white, non-Hispanic and nearly 12% are people of color, which is lower than the 19% average population of people of color countywide.

The next highest rate of poverty (23.2%) is located in south Lacey by Rainier Vista Community Park, which is the tract with the highest population of people of color in Thurston County. Of the individuals living below poverty level in this tract, about 62% are adults age 18 to 59. Children comprise nearly 26% of the population and of those children, about 24% are living below the federal poverty line.

About 22% of individuals are living below the poverty level in north Olympia (around Providence St. Peter's Hospital) and east Lacey (around River Ridge High School). The area around the hospital has the highest percentage of individuals with disabilities in the county, as well as a high rate of individuals born

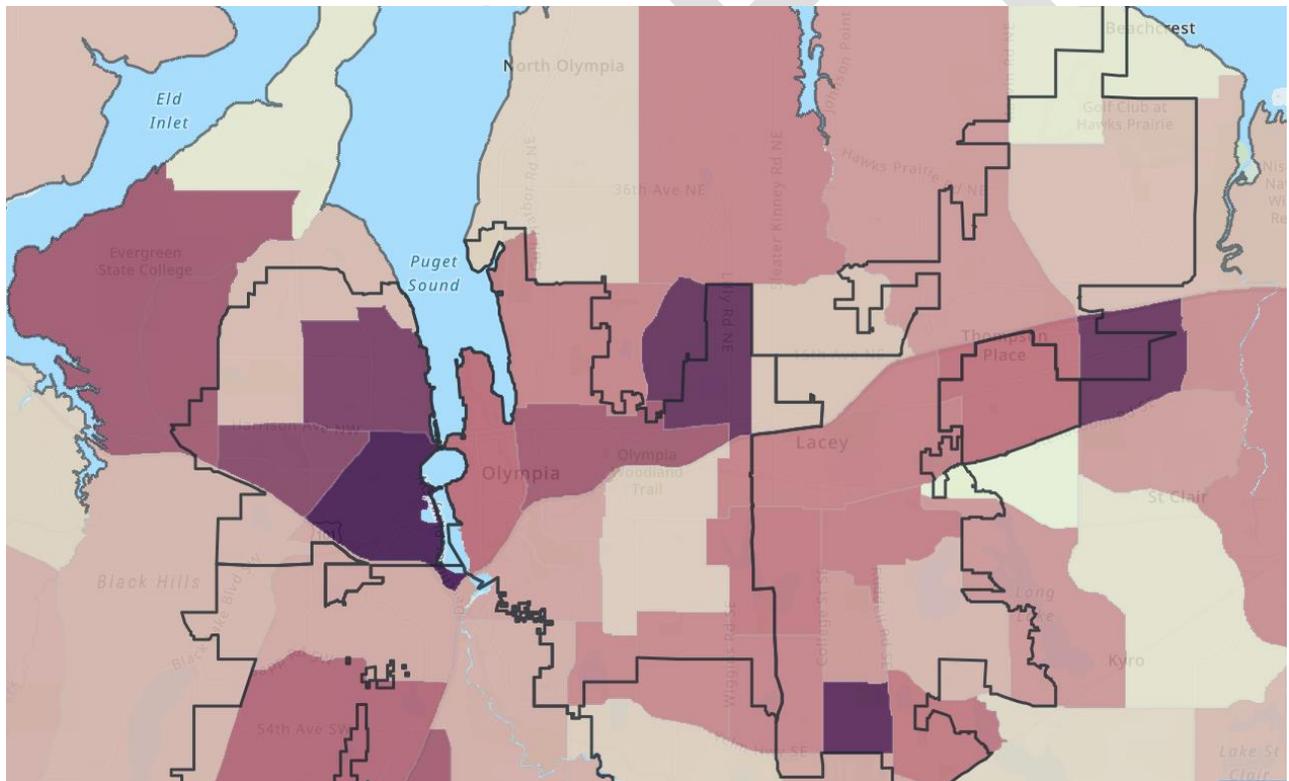
outside the U.S. (about 17% of the population). About 27% of children live below the federal poverty line in this tract.

An estimated 47% of the individuals living in poverty in the tract containing River Ridge High School are children and 40% are adults age 18-59. Around River Ridge High School, the population is about 71% white, non-Hispanic and 29% people of color. This area has a higher population of children than most areas of Thurston County. About 27% of the population is under age 18.

The area with the lowest rate of poverty is near the Lacey Community Center (where 0.8% of individuals have income below the poverty line and all are age 60 and over). This area is about 79% white, non-Hispanic and 21% people of color. Children comprise about 23% of the population and no households with children are living below the federal poverty line.

The Beachcrest area near Tolmie State Park has the next lowest rate of poverty (1.6% of the population has income below the poverty line). On the Cooper Point peninsula north of the Olympia Country Club, about 1.8% of the population has income below the poverty line. About 88-90% of residents in the Beachcrest area and Cooper Point peninsula are white, non-Hispanic.

Income below federal poverty level



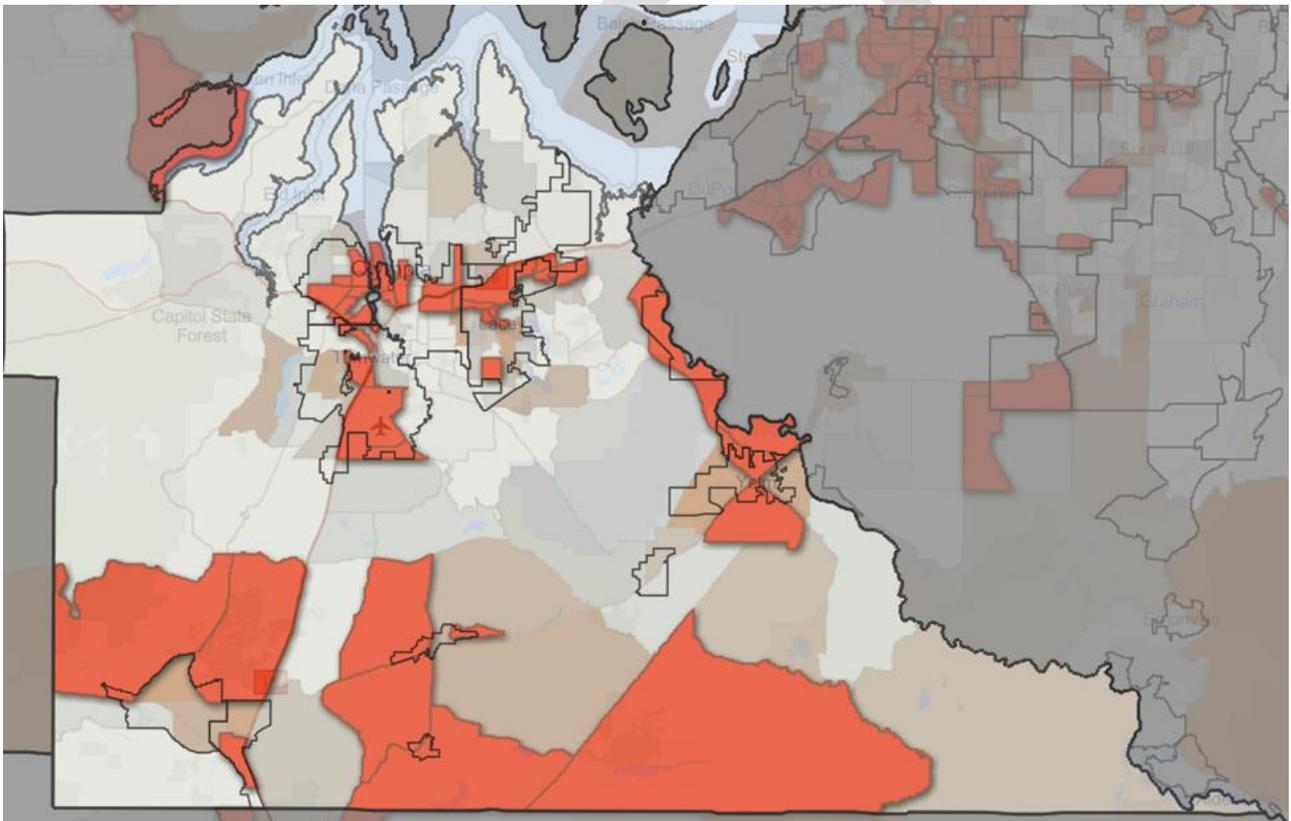
The map below shows areas where over 50% of households have low to moderate income. Low to moderate income is defined by HUD as earning less than 80% of Area Median Income.

Low to moderate income households are concentrated in the South County around Bucoda, parts of Tenino, along the southern border with Lewis County, north of Rochester, north and south Yelm, and the Nisqually reservation. The highest concentrations of low to moderate income households are in the

tract surrounding Bucoda (70% of households are low to moderate income) and the Nisqually reservation (69% of households are low to moderate income).

In the urban areas of the county, low to moderate income households are concentrated in the tract around the Olympia airport, parts of Tumwater Hill, in Tumwater by Michael T. Simmons Elementary, through downtown and West Olympia, along I-5 from East Olympia to Hawks Prairie, and in Lacey by Rainier Vista Community Park. The highest concentrations of low to moderate income households are in Olympia city limits. In downtown Olympia, 96% of households have low to moderate income. Around the Martin Way and Pacific Avenue triangle (east of Boulevard Road), 80% of households have low to moderate income. Around the Olympia Auto Mall extending up along Black Lake Boulevard, 78% of households have low to moderate income.

The lowest numbers of low to moderate income households are along the Puget Sound, especially the waterfront areas of Steamboat Island, Cooper Point, Boston Harbor and Johnson Point. In these areas, less than 20% of households earn under 80% AMI.



iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

Recent efforts to re-zone areas that have traditionally been zoned for single-family homes has aimed to increase the variety of housing options in single-family neighborhoods, which have often been populated by higher income households. Cities of Lacey, Olympia, and Tumwater have initiated actions to allow greater diversity of housing options through residential areas, as well as provide pre-approved

ADU plans. Providing more flexibility for duplexes, triplexes, fourplexes, sixplexes and courtyard apartments in residential zones can help create more rental opportunities and lower cost options in neighborhoods with low levels of poverty.

e. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The **Environmental Health Index** listed in HUD Table 12 indicates the health of a neighborhood, based on exposure to air pollution. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood. A lower number indicates worse neighborhood health.

HUD data shows that Black or African American and Asian or Pacific Islander residents are more likely to live in areas that are impacted by air pollution (both in Olympia and countywide). White, non-Hispanic, Hispanic/Latinx, and Native American individuals have less exposure to air pollution. Exposure is greater in Olympia than in Thurston County as a whole.

DRAFT

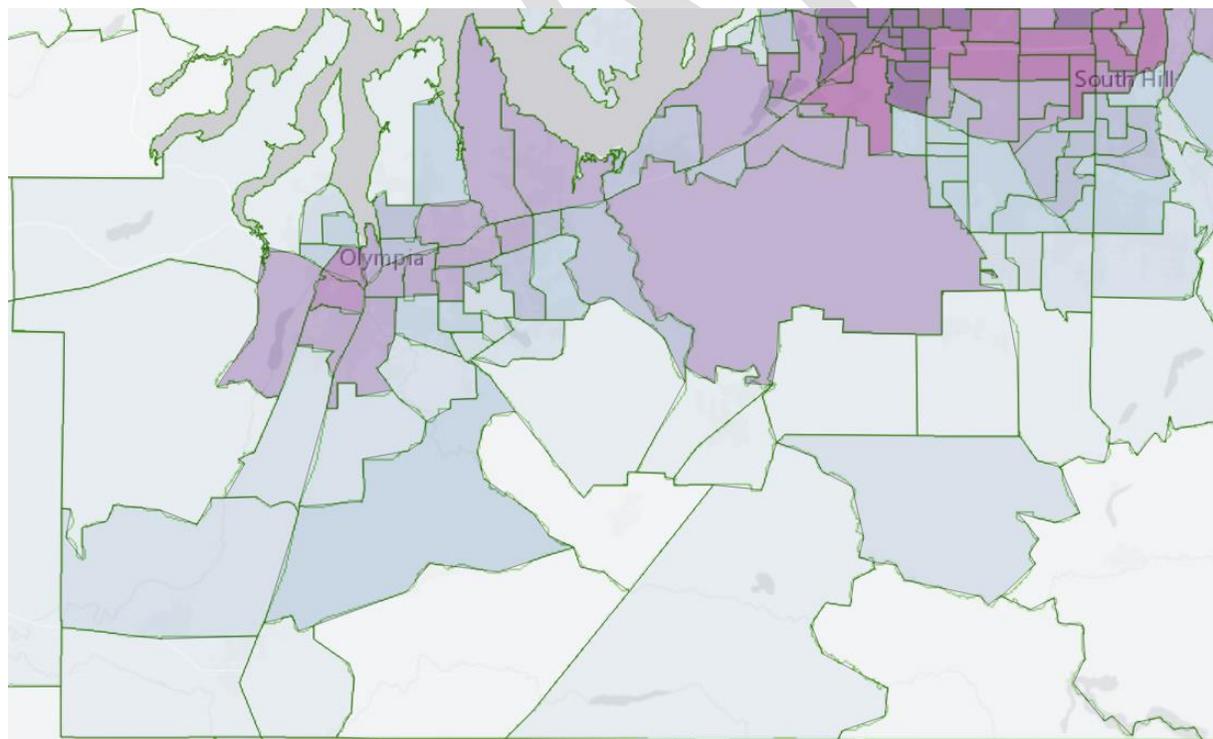
Table 12 - Opportunity Indicators, by Race/Ethnicity	
(Thurston County, WA CDBG) Jurisdiction	Environmental Health Index
Total Population	
White, Non-Hispanic	31.79
Black, Non-Hispanic	23.20
Hispanic	27.75
Asian or Pacific Islander, Non-Hispanic	23.44
Native American, Non-Hispanic	30.16
Population below federal poverty line	
White, Non-Hispanic	32.11
Black, Non-Hispanic	22.81
Hispanic	30.42
Asian or Pacific Islander, Non-Hispanic	22.03
Native American, Non-Hispanic	26.99
(Olympia-Tumwater, WA) Region	
Total Population	
White, Non-Hispanic	29.99
Black, Non-Hispanic	23.13
Hispanic	26.81
Asian or Pacific Islander, Non-Hispanic	23.38
Native American, Non-Hispanic	28.95
Population below federal poverty line	
White, Non-Hispanic	30.29
Black, Non-Hispanic	22.97
Hispanic	27.25
Asian or Pacific Islander, Non-Hispanic	22.02
Native American, Non-Hispanic	25.70
<p>Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA</p> <p>Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).</p>	

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

Overall, Thurston County experiences much lower environmental exposures than other counties along the I-5 corridor (from Tacoma to Everett). The Washington State Department of Health (DOH) created a Washington Environmental Health Disparities Map⁵¹ that evaluates environmental health risk factors in communities. According to the mapping tool, DOH ‘estimates a cumulative environmental health impact score for each census tract reflecting pollutant exposures and factors that affect people’s vulnerability to environmental pollution.’ The mapping tool uses Census and American Community Survey data to identify populations that may be at risk for adverse impacts of pollution and other environmental health hazards.

The map below shows environmental exposures to air pollutants, which includes diesel exhaust emissions and proximity to heavy traffic. The highest level of exposure to air pollutants is in the area surrounding Highway 101 in West Olympia and Tumwater, near the I-5 and 101 interchange. This area encompasses the Capital Auto Mall, Mottman Industrial Park, and South Puget Sound Community College. According to Washington State Department of Transportation, this highway interchange has nearly 20,000 diesel vehicles passing through on average each day. As evidenced in the map below, census tracts along the I-5 corridor in the urban core experience the highest levels of air pollution.

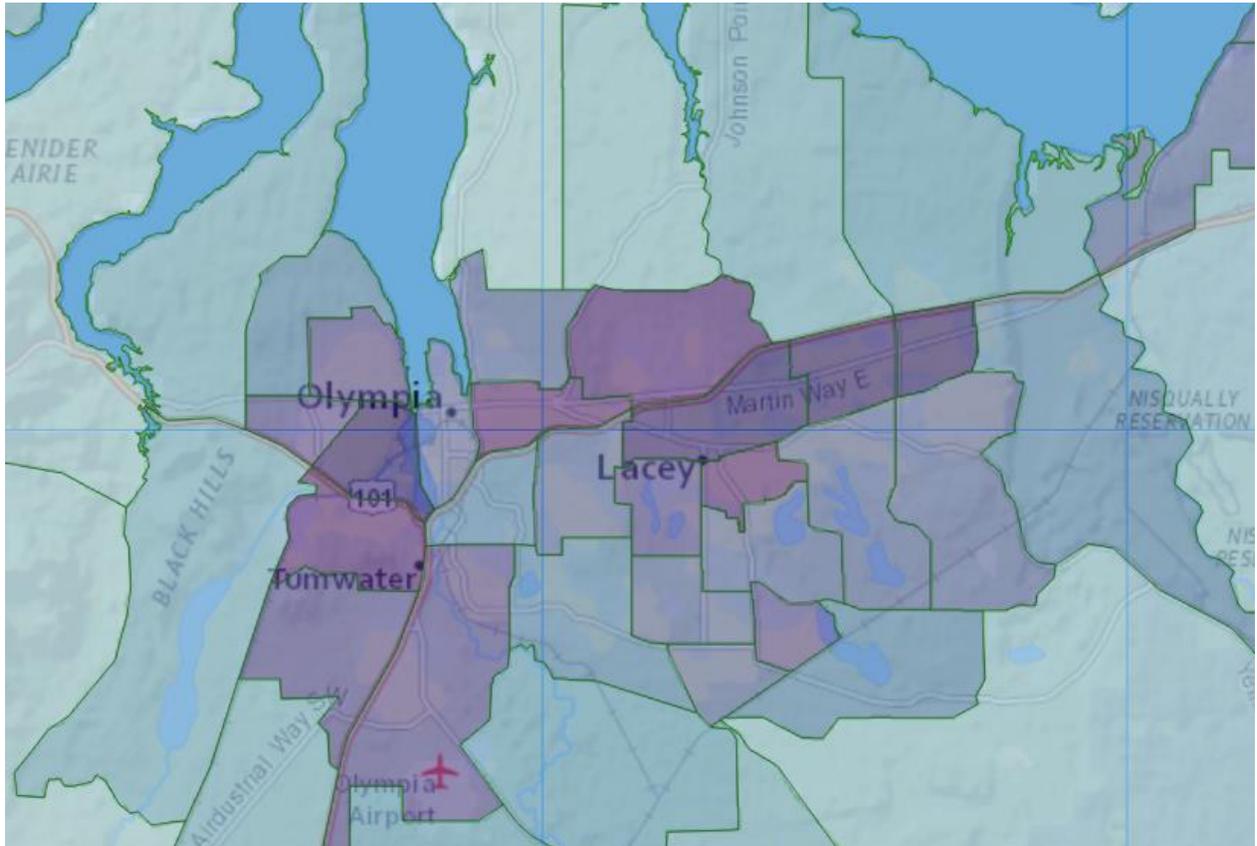
Diesel Exhaust



⁵¹ <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

The maps below overlay diesel pollution with priority populations to show disproportionate impact. Priority populations defined by DOH for purposes of this map are people of color, people with Limited English Proficiency, no high school diploma, living below 185% of the Federal Poverty Level, paying over 30% of their income to housing costs (cost-burdened), and unemployed.

Disproportionate Impact of Diesel Exhaust



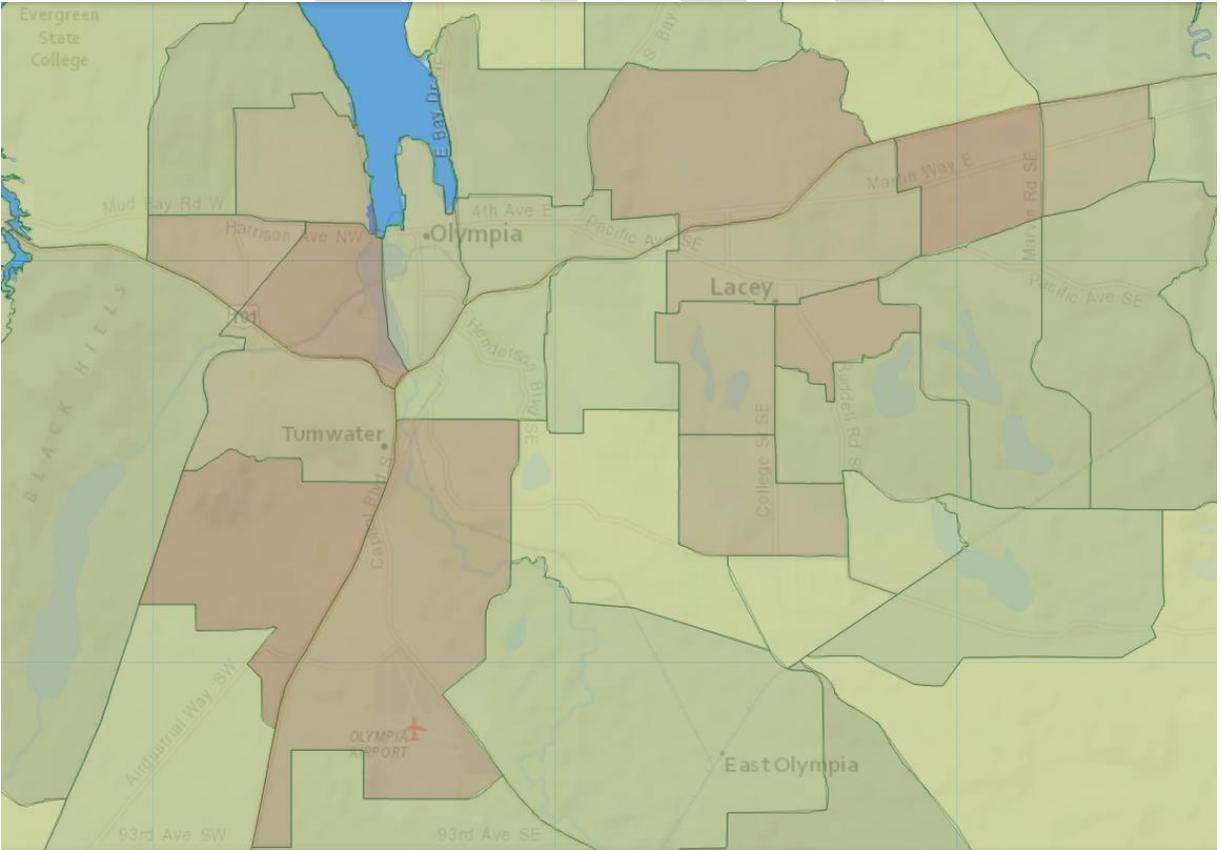
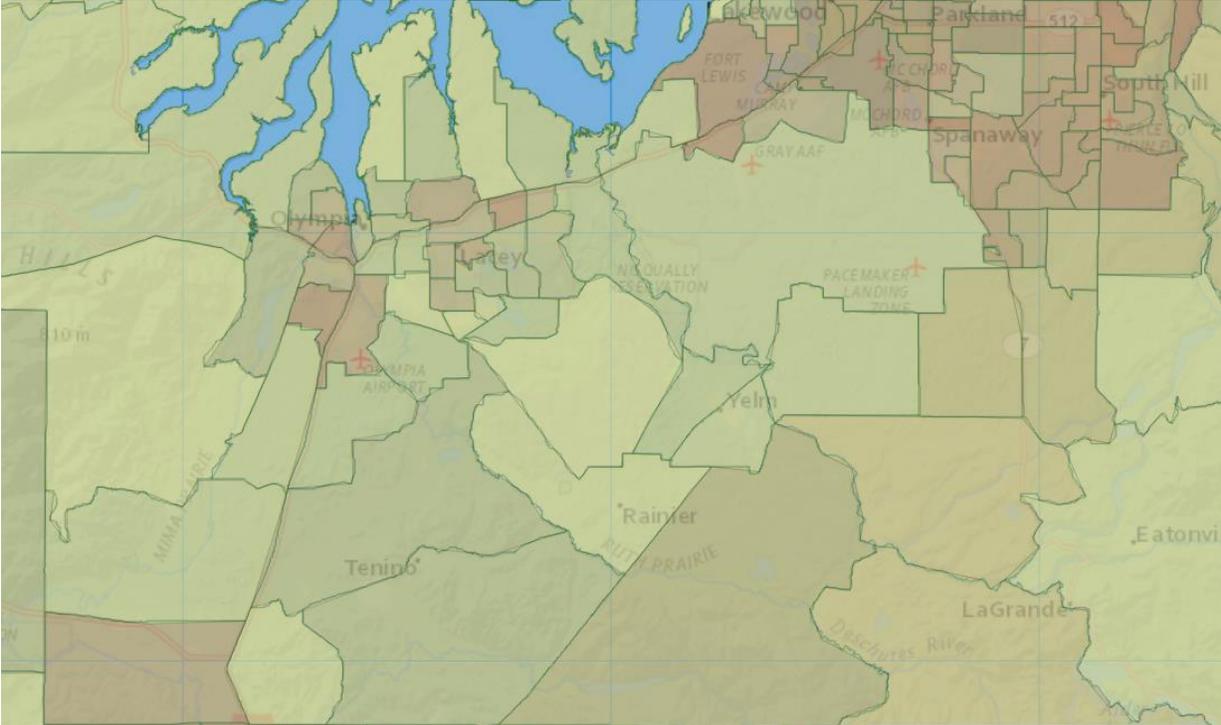
According to DOH’s analysis of risk, the areas experiencing the greatest disproportionate impact of diesel pollution are: southwest Olympia by the Auto Mall (Black Lake Boulevard to Capitol Lake), and in Lacey south of I-5 to Steilacoom Road (Tanglewilde, Mushroom Corner, around St. Martin’s University). Southwest Olympia has the highest rate of poverty in the county and the high rates of renter housing cost burden. The tracts in Lacey have high rates of people of color, people with Limited English Proficiency, and high rates of poverty among children.

Wildfire Smoke

The map below shows an overlay of environmental health risk factors and wildfire smoke days. The areas with the highest number of wildfire smoke days are:

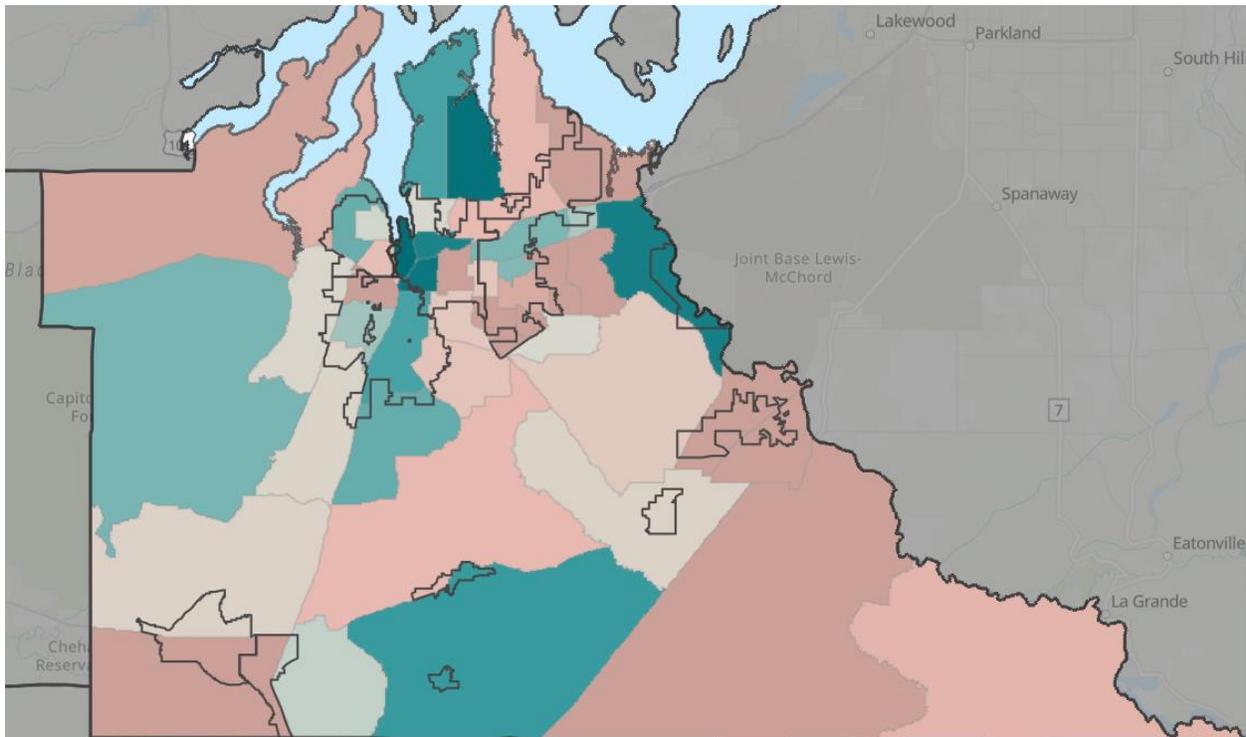
- Southwest corner of the county (south of Rochester)
- Tumwater around Trosper Road west of I-5
- Southwest Olympia around the Auto Mall
- Tanglewilde in Lacey

As indicated previously, Tanglewilde has higher population of color. Southwest Olympia has high rates of poverty.



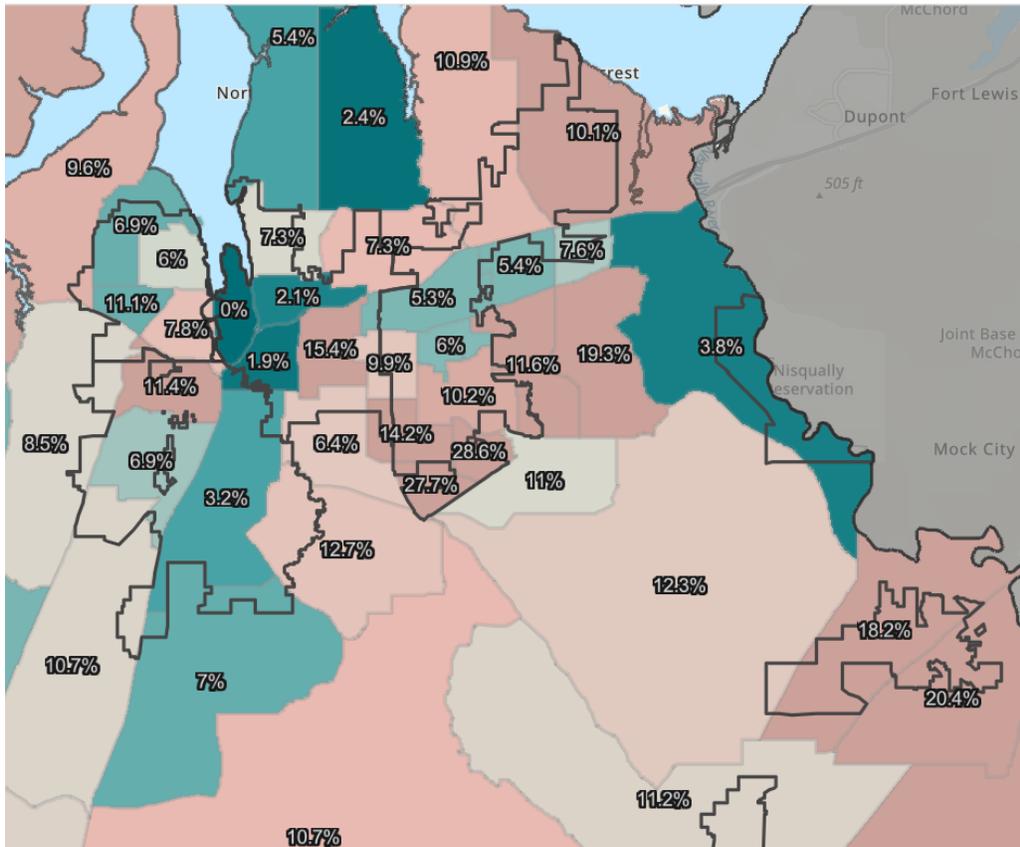
Lead Based Paint

The map below shows risk of exposure to lead-based paint to children. HUD CHAS data identifies housing units that were built prior to 1980 (when there was a higher likelihood of lead-based paint) and the household contains children under age 6. Pink represents higher risk of children exposed to lead-based paint and green represents lower risk of children exposed to lead-based paint. Highest risk areas are in South Lacey and throughout the south County. These housing units are located throughout the county, with no discernible patterns related to race, ethnicity or other groups.



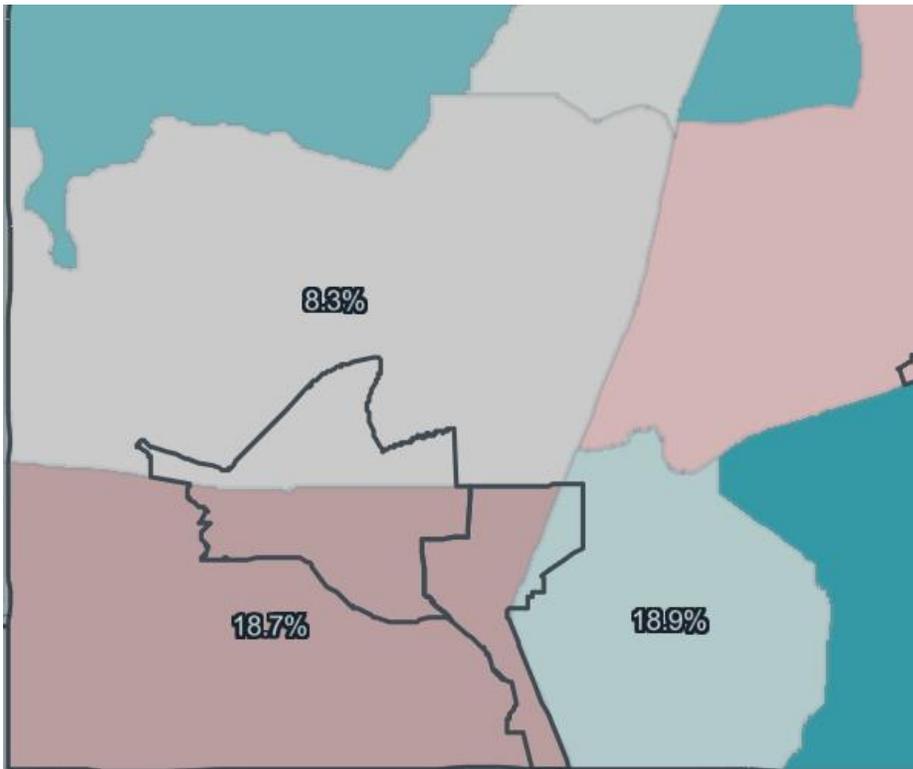
Adjacent tracts in South Lacey (around Capitol City Golf Course and just north of the Amtrak Station) have the highest rates of children in structures built prior to 1980 where there is higher risk of exposure to lead-based paint. In the tract just north of the Amtrak station, 18.5% of renter-occupied units with children and 10% of owner-occupied units with children were built before 1980. This tract has a population of about 31% people of color (higher than the countywide average of 19%). In the adjacent tract containing Capitol City Golf Course, 18.8% of renter-occupied units with children and 8.9% of owner-occupied units with children were built before 1980. This tract has a population that is about 20% people of color, which is roughly equivalent to the countywide average.

Detail of the urban areas of the county, structures built before 1980 with children under age 6

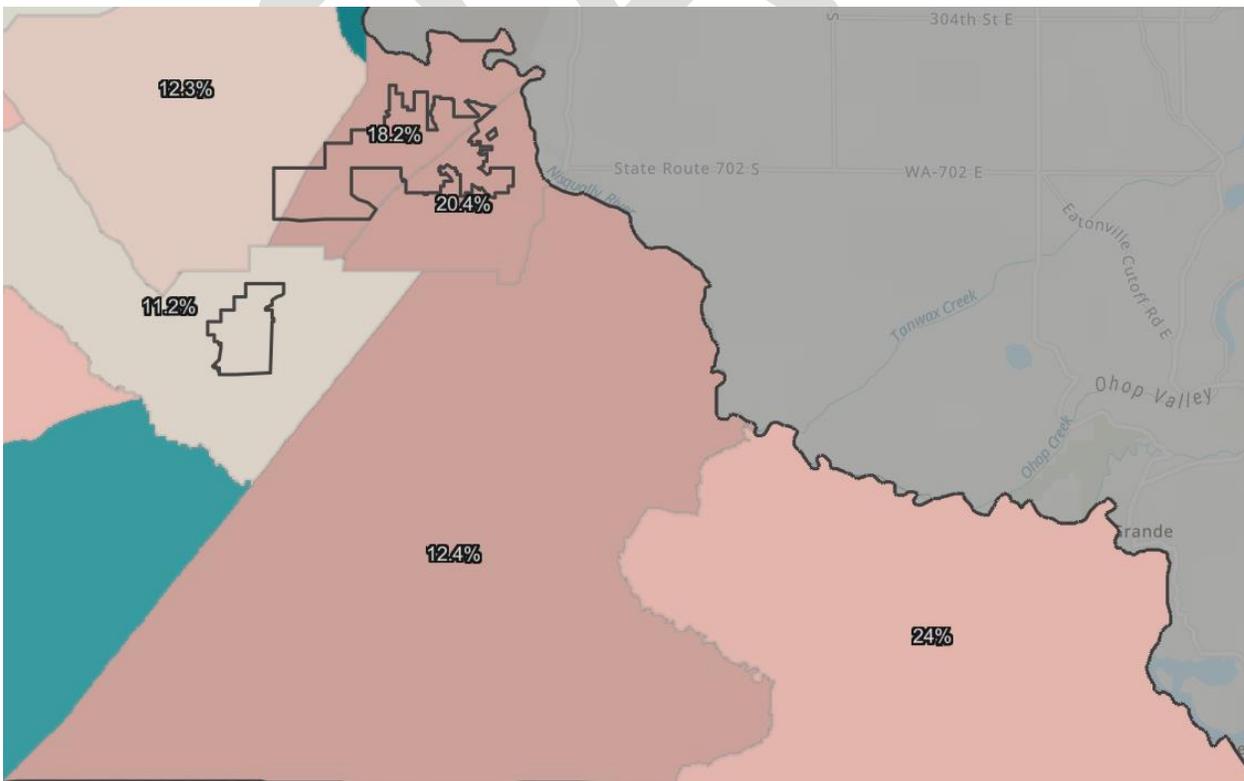


In the tract to the east of Grand Mound and I-5, 2.8% of renter-occupied and 16% of owner-occupied units with children were built prior to 1980. This tract has a population that is only 7.7% people of color (which is far below the countywide average of 19%). In the furthest southeast tract of the county (in the Bald Hills area), 8.3% of renter-occupied units and 15.6% of owner-occupied units with children were built prior to 1980. This tract has a population that is 11.6% people of color.

Detail of Rochester and Grand Mound, structures built before 1980 with children under age 6



Detail of Yelm and Bald Hills, structures built before 1980 with children under age 6



iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

All survey respondents were asked whether they were concerned about the following environmental or health issues in their current housing: mold, lead-based paint, clean and safe drinking water, asbestos, air quality/pollution, flooding, landslides/erosion, wildfires, high heating costs or insufficient heat, high cooling costs or insufficient cooling, unsafe electrical wiring, unsafe structural conditions (such as rotting floorboards), insufficient garbage collection (such as no residential collection services), rodent or insect infestation, and lack of kitchen or plumbing facilities.

The most common concerns among respondents were: high heating costs or insufficient heat (57.4% of respondents), mold (48.2% of respondents), high cooling costs or insufficient cooling (44.7%), and air quality/pollution (32.5%). About 25% of survey respondents pay over \$250 per month for utilities.

About 19% of respondents indicated they had experienced health impacts as a result of these conditions and an additional 26.7% of respondents indicated that they were unsure if they have experienced health impacts as a result of these conditions. Below are a sample from over 100 responses:

- Prolonged allergic reactions due to mold.
- Mold has caused skin reactions, depression, and focus issues.
- Sinus allergies due to mold and poor ventilation.
- Mold + smoke have impacted my respiratory health.
- Smoke from wildfires exacerbates my reactive airway disease.
- Both myself and my roommate are experiencing sinus and lung issues as well as fatigue and headaches related to the mold.
- Air quality has caused asthma attacks and water quality set off IBS.
- Persistent cough - smell of rat urine also makes me sick.
- Breathing problems due to mold and air pollution in the area.
- Heat (too hot) it causes an increase in seizure activity.
- Severe Headaches, severe cough, respiratory and sinus issues. Asthma flare ups.
- Gripe continúa por el frío (ongoing flu because of the cold)

Over half of survey respondents live in homes over 30 years old. Older homes have greater likelihood of lead-based paint and less likely to have efficient heating or cooling systems.

The town of Bucoda has the highest percentage of older housing units in Thurston County. Bucoda Mayor Steve Purcell expressed these specific environmental concerns: asbestos is still present in town water infrastructure, flooding typically obscures the road to about half of the residential homes in town, and the town has expended most of the buildable land because new construction cannot occur on floodplains. The town is bordered by the railroad and the Skookumchuck River.

f. Patterns in Disparities in Access to Opportunity

i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

According to HUD Opportunity Index measures, Native American households have the most difficulty accessing job opportunities, high performing schools, public transportation, and neighborhoods with low levels of poverty. Native American households have less impact from environmental health hazards. The highest concentrations of Native American households in Thurston County are on the Nisqually reservation, which lies on the far eastern border of the county—further from job and transit centers. Black or African American and Asian households experience greater impact from air pollution, likely due to proximity to high traffic roadways such as Interstate 5. These populations are more heavily concentrated in Lacey and other areas of the urban core.

According to the Dissimilarity Index, Thurston County has fairly low segregation overall. Thurston County has no HUD-identified R/ECAPs and the highest level of segregation according to the Dissimilarity Index is a 27.4 (values of 30 or below are considered to be fairly low, on a scale of 0-100) between white and Black, and between white and Asian households.

As stated earlier in the section on R/ECAPs, many areas with higher levels of poverty and higher population of people of color are on the outer edges of the Lacey, Olympia, Tumwater area (or are located in the Urban Growth Area). These tracts are often located at the end of public transit routes, which may mean that residents have to make several transfers or spend more time commuting to opportunities and resources.

ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

Areas in the urban core generally have high access to job opportunities, proficient schools, and transit, however, they also have higher rates of air pollution and higher rates of poverty. Areas along the waterfront tend to have high income, high labor market engagement, high performing schools, but have less access to public transit. South County residents have longer commutes, fewer high performing schools, fewer transit options, and higher poverty rates (particularly along the border with Lewis County).

East Olympia (particularly northeast near Budd Inlet and large areas of southeast Olympia around Wildwood, Washington Middle School, and Olympia High School) has lower rates of poverty overall than West Olympia. South Tumwater (around the airport) has higher rates of poverty and lower access to opportunities than the Black Lake area. Pockets of Lacey have higher poverty rates and lower access to opportunities, particularly in the tract containing Rainier Vista Community Park. Fewer residents in this area have access to a vehicle and are further from transit hubs, and there are fewer job opportunities nearby. Tanglewilde has lower access to proficient schools and more exposure to air pollution, but also has higher proximity to jobs and transit.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

Community survey respondents were asked how easy or difficult it is to get to various resources from where they live. Between 37-38% of American Indian or Alaska Native and Black or African American respondents reported that it is somewhat difficult or very difficult to access job opportunities near where they live. About 28% of white respondents reported that it is somewhat difficult or very difficult to access job opportunities near where they live. About 40% of transgender respondents and 32% of respondents with disabilities reported that it is somewhat difficult or very difficult to access job opportunities near where they live. Just over 33% of Native Hawaiian or other Pacific Islander respondents (2 of 6) commute 20 miles or more to their job.

Transgender respondents reported greater difficulty in accessing community resources near where they live:

- 60% of transgender respondents reported it was somewhat or very difficult to get to a pharmacy near where they live
- 73% of transgender respondents reported it was somewhat or very difficult to get to hospital or health care facilities near where they live
- 47% of transgender respondents reported it was somewhat or very difficult to get to a community or cultural center near where they live

One-third of Hispanic/Latinx respondents reported it was somewhat or very difficult to get to a public library near where they live.

Nearly one quarter of Black or African American respondents reported it was somewhat or very difficult to get to a recreation center or playground and hospital or health care facilities near where they live.

About 29% of respondents with disabilities reported it was somewhat or very difficult to get to a community/cultural center or a public library near where they live and 31% of respondents with disabilities reported it was somewhat or very difficult to get to hospital or health care facilities near where they live.

Overall, most survey respondents believe their neighborhood has good schools. Across racial and ethnic groups, over 50% of respondents agree with the statement 'my neighborhood has good schools.' Respondents with disabilities or a disabled family member were less likely to agree that their neighborhood has good schools.

Asian respondents were most likely to report they are happy with where they live. While 76% of Asian respondents are happy with where they live, about 59% of white respondents, 59% of Hispanic/Latinx respondents, 48% of Black or African American respondents, 67% of Native Hawaiian or other Pacific Islander respondents, 57% of American Indian or Alaska Native respondents are happy with where they live. About 40% of transgender respondents, 54% of families with children, and 52% of respondents with disabilities are happy with where they live.

American Indian or Alaska Native and Black or African American respondents were the least likely to report that their housing meets their needs (between 46-48% say their housing meets their needs). About 40% of transgender respondents and American Indian or Alaska Native respondents agreed with the statement, 'my housing is safe and healthy for me and my family.'

Transgender and Native Hawaiian or other Pacific Islander respondents were least likely to agree with the statement, 'my housing fits my budget.' Only 27% of transgender respondents reported their housing fits their budget, while 67% disagreed. Only 33% of Native Hawaiian or other Pacific Islander respondents reported their housing fits their budget, while 67% disagreed.⁵²

Respondents were more likely to report that their neighborhood has a mix of family sizes and ages, than a mix of owners and renters, or people from different racial, ethnic and cultural backgrounds.

A higher percentage of respondents of color reported losing household income due to COVID:

- 66% (19) Black or African American respondents lost income due to COVID
- 54% (20) Hispanic/Latinx respondents lost income due to COVID
- 83% (5) Native Hawaiian or Pacific Islander respondents lost income due to COVID
- 45% (13) Asian respondents lost income due to COVID
- 41% (199) of white respondents lost income due to COVID

b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

No additional information was reviewed.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of local or regional cooperation

⁵² Note: There are small sample sizes for both of these groups, so margin of error is higher. There were a total of 15 transgender respondents and 6 Hawaiian or other Pacific Islander respondents to the survey.

- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

Location and type of affordable housing, Impediments to mobility, Lack of access to opportunity due to high housing costs, Land use and zoning laws: Generally, housing in the urban core of Thurston County is located near transit, job opportunities, and proficient schools. However, housing along these major arterials is also impacted by air pollution from roadways, less walkable neighborhoods, and experiences higher rates of poverty. Low poverty neighborhoods within relative proximity to services tend to be dominated by single-family homes and have fewer affordable options. Due to rising housing costs, more residents may be forced to relocate to areas that are less expensive but have lower access to opportunities. Many of the tracts that were identified as having higher population of people of color and higher rates of poverty (such as areas surrounding Rainier Vista Community Park, Evergreen State College, Olympia airport) are further on the edges of cities where their transit access is limited and there are fewer job opportunities.

Lack of public investments in specific neighborhoods, including services or amenities, and Availability, type, frequency, and reliability of public transportation: Location of housing and transportation access has an impact on economic opportunities. Thurston Regional Planning Council (TRPC) conducted a community survey as part of their 'Coordinated Human Services Transportation Plan for the Thurston Region' in 2021, which found that 7% of respondents have trouble finding a job or a better job due to their transportation options; 13% of respondents with a disability affecting their mobility have trouble finding a job or a better job due to their transportation options; and 19% of respondents with a household income less than \$35,000 have trouble finding a job or a better job due to their transportation options. This compares to just 7% of respondents with a household income between \$35,000 and \$75,000 and 4% of respondents with a household income of \$75,000 or more.

Most fair housing community survey respondents do not believe their neighborhood is accessible for people who use wheelchairs or other mobility devices. About 30% of respondents with disabilities believe their neighborhood is accessible for people who use mobility devices, while nearly 50% do not believe their neighborhood is accessible. Across racial and ethnic groups, over 30% of respondents do not believe they live in an accessible neighborhood.

Accessible sidewalks, curb ramps, and pedestrian lighting are important improvements to accessing transit safely. Community survey respondents with disabilities or a disabled family member were asked whether they had difficulty accessing transportation near where they live, difficulty finding schools or childcare in their neighborhood that meets their child's disability-related needs, and difficulty navigating their neighborhood due to lack of sidewalks, curb cuts, cross walks or pedestrian lighting. People of color with disabilities reported greater difficulty with transportation and neighborhood accessibility than white respondents.

- 25% of white respondents with disabilities or a disabled family member reported having difficulty accessing transportation near where they live, compared to 50% of Hispanic/Latinx respondents and 29% of American Indian or Alaska Native respondents.
- 24% of white respondents with disabilities or a disabled family member reported having difficulty navigating their neighborhood due to lack of sidewalks, curb cuts, lack of crosswalks or pedestrian lighting, compared to 42% of Hispanic/Latinx respondents, 33% of American Indian or Alaska Native respondents, 29% of Black/African American respondents, and 30% of respondents who are pregnant or have children under age 18.
- 27% of respondents who are pregnant or have children under age 18 reported having difficulty finding schools or childcare in their neighborhood that meet their child's disability-related needs

iv. Disproportionate Housing Needs

1. Analysis

a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

HUD defines severe housing problems as: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%. HUD data is not available based on household size for overcrowding, and incomplete kitchen or plumbing facilities.

In Thurston County, Native American and Asian or Pacific Islander households experience severe housing problems at the highest rates (46% and 42%, respectively). In Olympia, Native American and households categorized under 'other race' experience severe housing problems at the highest rates (45% and 42%, respectively). Forty-five percent (45%) to 46% of families with five or more members experience severe housing problems in both Thurston County and Olympia.

Severe Housing Problems by Race/Ethnicity and Household Type/size

	Thurston County			Olympia-Tumwater Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	21,148	67,312	31.4%	28,025	85,270	32.9%
Black, Non-Hispanic	908	2,430	37.4%	1,055	2,780	38.0%
Hispanic	1,915	5,039	38.0%	2,275	5,995	38.0%
Asian or Pacific Islander, Non-Hispanic	1,774	4,191	42.3%	2,098	5,408	38.8%
Native American, Non-Hispanic	498	1,073	46.4%	530	1,166	45.5%
Other, Non-Hispanic	829	2,127	39.0%	1,190	2,820	42.2%
TOTAL	27,080	82,190	33.0%	35,200	103,470	34.0%
Household Type and Size						
Family households, less than 5 people	13,519	50,506	26.8%	16,500	60,460	27.3%
Family households, 5+ people	3,321	7,181	46.3%	3,710	8,200	45.2%
Non-family households	10,267	24,533	41.9%	14,995	34,815	43.1%

Source: HUD AFFH Tool, table 9⁵³

The table below identifies the number and percentage of households with severe housing problems within each racial or ethnic group at various income levels (from under 30% to over 100% of Area Median Family Income).

According to HUD data, 100% of Pacific Islander households that earn less than 30% of Area Median Family Income experience at least one severe housing problem. Nearly half (45%) of Hispanic/Latinx households and nearly 60% of Black or African American households who earn between 30% and 50% of Area Median Family Income also experience severe housing problems.

Over 67% of all households earning under 30% of Household Area Median Family Income experience one or more severe housing problems.

⁵³ <https://egis.hud.gov/affht/>

Severe Housing Problems by Income and Race or Ethnicity (Thurston County)

RACE OR ETHNICITY	INCOME LEVEL				
	≤ 30% HAMFI	>30% to ≤ 50% HAMFI	>50% to ≤ 80% HAMFI	>80% to ≤ 100% HAMFI	>100% HAMFI
White alone, non-Hispanic	7,070 (67.8%)	2,960 (32.2%)	1,575 (9.5%)	435 (3.9%)	755 (1.8%)
Hispanic, any race	945 (69.0%)	500 (45.0%)	75 (5.3%)	30 (4.8%)	50 (2.2%)
Asian alone, non-Hispanic	365 (55.3%)	255 (39.2%)	95 (10.4%)	20 (5.1%)	0 (0%)
Black or African American alone, non-Hispanic	180 (50.0%)	220 (59.5%)	50 (13.5%)	0 (0%)	35 (2.6%)
American Indian or Alaska Native alone, non-Hispanic	195 (61.9%)	80 (32.7%)	20 (8.7%)	0 (0%)	40 (9.0%)
Pacific Islander alone, non-Hispanic	100 (100%)	8 (4.3%)	0 (0%)	0 (0%)	20 (8.2%)
TOTAL HOUSEHOLDS	9,275 (67.1%)	12,235 (34.2%)	20,375 (9.2%)	13,345 (3.6%)	50,225 (1.9%)

Source: 2015-2019 CHAS Data (Table 2)

Households are considered severely cost burdened if they spend more than 50% of their income on housing. For renters, housing costs include rent plus utilities. For owners, housing costs include mortgage payment, utilities, association fees, insurance, and real estate taxes.

The table below shows the percentage of households, by race or ethnicity, with a severe housing cost burden. Housing cost burden is prevalent across racial and ethnic groups, though it is more common among renters. Nearly 23% of all renters countywide are severely cost burdened. American Indian or Alaska Native households experience the highest rates of severe housing cost burden, followed by Hispanic/Latinx renters and owners.

Severe Housing Cost Burden by Race or Ethnicity (Thurston County)

RACE OR ETHNICITY	Owner Occupied	Renter Occupied
	% severe cost burden	% severe cost burden
White alone, non-Hispanic	7.7%	22.5%

RACE OR ETHNICITY	Owner Occupied % severe cost burden	Renter Occupied % severe cost burden
Hispanic, any race	9.9%	28.0%
Asian alone, non-Hispanic	12.3%	17.7%
Black or African American alone, non-Hispanic	5.1%	21.5%
Other (including multiple races, non-Hispanic)	5.4%	23.7%
American Indian or Alaska Native alone, non-Hispanic	14.5%	32.4%
Pacific Islander alone, non-Hispanic	3.8%	0%
TOTAL HOUSEHOLDS	8.0%	22.9%

Source: 2015-2019 CHAS Data (Table 9)

Reviewing data for cost burden (spending over 30% of income to housing costs) may help identify any additional disparities. Due to the small sample sizes in cities or towns in south Thurston County, there is a large margin of error for the data. Larger cities of Lacey, Olympia and Tumwater have been included in this analysis, as well as unincorporated Thurston County (areas not within a town or city) and Thurston County as a whole (includes data for Nisqually reservation). Some racial or ethnic groups still have relatively small sample sizes within these cities or countywide, so may have a higher margin of error.

Native American, Pacific Islander and Hispanic/Latinx renters experience the highest rates of cost burden countywide. In Thurston County, 67% of Native Americans, 60% of Pacific Islanders, and 59% of Hispanic/Latinx renters pay over 30% of their income on rent. About 46% of white renters are cost burdened countywide. About 74% of Hispanic/Latinx renters in Tumwater and 69% of Hispanic/Latinx renters in Lacey are cost burdened. In comparison, 46% of white renters in Tumwater and 50% of white renters in Lacey are cost burdened. Over 83% of Native American renters in Olympia are cost burdened, while about 53% of white renters in Olympia are cost burdened.

The data in this paragraph includes relatively small sample sizes (80-90 households), so may have a higher margin of error, but presented some stark statistics that are worth further review. In unincorporated Thurston County, 96% of Pacific Islanders who rent are cost burdened. In Olympia, 88% of Pacific Islanders who rent are cost burdened. In Tumwater, 44.4% of Black or African American renters are severely cost burdened (pay over 50% of their income to housing costs), while 25.5% of white renters are severely cost burdened.

Countywide, about 30% of homeowner households who are Native American, Black or African American, or Hispanic/Latinx are cost burdened, compared to about 21% of white homeowners. Overall, Lacey has more homeowners who are people of color than Olympia or Tumwater, and also has higher rates of cost burden among homeowners of color than white homeowners. There are an estimated 465 Black or African American households who own their homes in Lacey and of those, about 27% are cost burdened.

In Olympia, there are an estimated 80 Black or African American households who own their homes and 19% are cost burdened.

Hispanic/Latinx homeowners are cost burdened at a higher rate in the cities and towns outside of the Olympia-Lacey-Tumwater urban core. This includes Yelm, Tenino, Rainier, Bucoda, as well as Rochester and Grand Mound. About 28.2% of Hispanic/Latinx homeowners are cost burdened in Thurston County and 27.5% in unincorporated Thurston County, while cost burdened at rates of 26.8%, 21.8%, and 12.8% in the Lacey, Olympia and Tumwater.

Smaller family households (2-4 members) who rent experience greater cost burden than small families who own their homes. In Thurston County, nearly 45% of small family households who rent are cost-burdened (meaning they spend more than 30% of their income on rent). Larger families with five or more members who rent are cost burdened at lower rates than smaller family households, except in Lacey. Nearly 60% of 5+ member families who rent in Lacey are cost burdened, compared to 50% of 5+ member families who rent in Lacey. Larger family (5+ members) households who own their homes are cost burdened at higher rates than small family (2- member) households.

Other non-family households (elderly or single adults) are cost burdened at higher rates than families in all jurisdictions and countywide. A quarter of these households who own their homes are cost burdened, while 61% of non-family/elderly households who rent are cost burdened. A high proportion of non-family/elderly households are severely cost burdened. Countywide, 32% of non-family/elderly households spend over 50% of their income on rent and in Tumwater, 38% of non-family/elderly households spend over 50% of their income on rent.

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

The most common housing problem in Thurston County is cost burden. Overcrowding and lack of kitchen or plumbing facilities is relatively uncommon, though there are populations in the county which experience these problems at higher rates. According to community advocates at local organizations, substandard housing conditions and overcrowding are likely underreported. Many marginalized community members fear retaliation if they report repairs to the landlord, or may own RVs or manufactured homes that lack water or cooking functions. In rural communities, under-the-radar rental situations (carports or sheds, open fields rented to people with RVs, etc) are often characterized by lack of access to water, sewer/septic, or cooking facilities. One community organization shared that a property owner was renting out spaces in an open field to individuals with RVs for \$1,200/month, which lacked access to sewer/septic, running water, or electricity. There are other situations in the same rural community where an elder generation owns a home, and their adult children live on the property in out buildings like sheds or barns. In more urban areas, advocates have described overcrowded apartments where family members have moved in after self-evicting (receiving a notice and leaving) due to limited English Proficiency and lack of understanding of the legal process. In one example shared by a community advocate, 36 individuals were living in one housing unit without knowledge of the landlord. These situations are frequently caused by economic displacement through eviction or being priced out of more traditional housing units, leading households to seek out more tenuous or non-traditional rental situations.

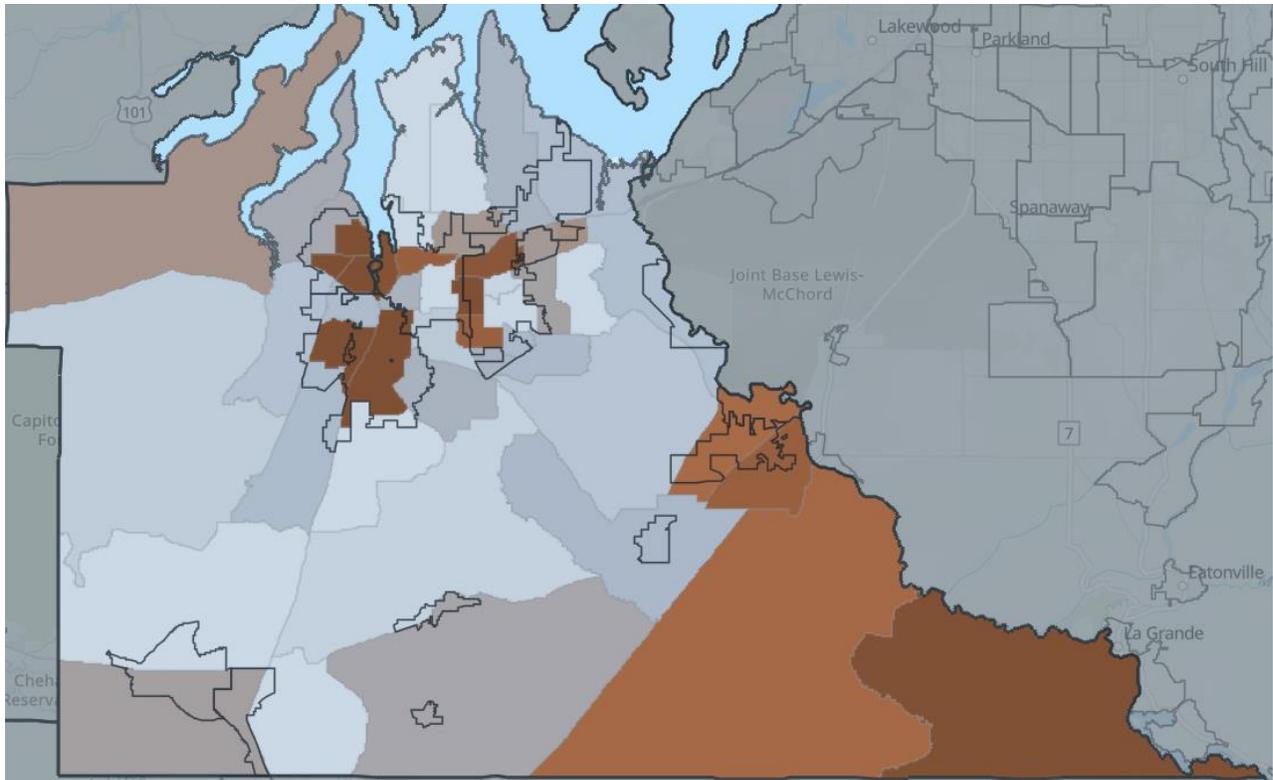
One survey respondent shared: *'I live in a 5th wheel travel trailer that has no running water or heat. I'm 72 and have a heart condition so I can't do the repairs myself at this time.'*

Of the total 613 community survey respondents, 66 respondents live in households where there is more than 1 person per bedroom. Hispanic/Latinx and Native American respondents were more likely to live in overcrowded housing than other racial or ethnic groups. There were 8 Hispanic/Latinx respondents who live in overcrowded housing, which represents 12% of respondents in overcrowded housing compared to 6% of overall survey respondents who identified as Hispanic/Latinx. About 11% of respondents in overcrowded housing were American Indian or Alaska Native compared to 6% of overall survey respondents who identified as American Indian or Alaska Native. Nearly 8% of respondents in overcrowded housing were born outside the U.S. compared to 5% of overall survey respondents who were born outside the U.S. Three of the four survey respondents who were born in Mexico live in overcrowded housing conditions. About 77% of survey respondents in overcrowded housing conditions are pregnant or have children under the age of 18 living with them, compared to 31% of overall survey respondents who have children living with them. Of the survey respondents with more severe overcrowding (for example, 10 people in a 4-bedroom housing unit), most had a spouse or partner, children under age 18 and parents or other relatives living with them.

Thirty-one survey respondents of 613 noted they are concerned about a lack of kitchen or plumbing facilities in their current housing unit. Of those respondents, 1 resides in Rochester, 1 resides in Tumwater, 1 resides in Tenino, 4 reside in Lacey, 23 reside in Olympia, 1 resides in unincorporated Thurston County. About 80.6% are white, 22.6% are American Indian or Alaska Native, 9.7% are Black or African American, and 6.5% are Native Hawaiian or other Pacific Islander. Considering that American Indian or Alaska Native individuals comprised 5.7% of overall survey respondents and 1.2% of the countywide population, American Indian or Alaska Native respondents experience disproportionately high rates of substandard housing. One individual was born outside the U.S. in Denmark. A disproportionately high number of respondents in substandard housing are female (80.6%) and bisexual/pansexual (29%) or queer (9.7%). Nearly 75% have a disability or someone in their household has a disability and 35% have children under age 18.

Of the 31 respondents who were concerned by a lack of kitchen or plumbing facilities in their current housing, 58.1% are renting, 6.5% live in a home they own, 6.5% are staying with family/friends, 22.6% are experiencing homelessness, and 6.5% indicated other (room-share; living with abuser and can't afford to leave). About 33% of these respondents indicated their housing type as 'other': *'House broken into two apartments'; 'Rv at a single family home'; 'Sailboat'; 'Old Converted house to 8 apartments'; '1 of 2 single family homes on a single lot'; '5th wheel travel trailer'; 'travel trailer'; 'Roomshare I rent a room from a guy owns house with 3 br 2 ba'*. An additional 29.2% live in an apartment with 5+ units, 16.7% live in an apartment with 1-5 units, 16.7% live in a single family home, and 4.2% live in a duplex.

The map below shows prevalence of four housing problems (overcrowding, high housing costs, lack of kitchen facilities, or lack of plumbing facilities) identified by HUD. Darker shading indicates more households in that census tract experience one of the four housing problems.



Overcrowding

Overcrowding is most prevalent in northwest Olympia around Garfield Elementary and Capital High School (3% of renter-occupied households have more than 1 person per room). This tract is north of Harrison Avenue from Cooper Point Road to Budd Inlet. In the same tract, 2% of renter-occupied households lack kitchen or plumbing facilities. This area is 25% people of color and 75% white, non-Hispanic. About 6% of adults have limited English ability. This area also has a high number of students from Evergreen State College, who often live in shared housing situations.

Lack of kitchen or plumbing facilities

About 4% of homeowners in the tract containing the Nisqually reservation lack kitchen or plumbing facilities. This area has the highest rate of American Indian or Alaska Native people (13%) in Thurston County, and 15% of the population is Hispanic/Latinx.

About 3% of renters located in the tract containing South Puget Sound Community College and 3% of renters located in downtown Olympia lack kitchen or plumbing facilities. Downtown Olympia is predominantly white (around 85%), however, there is a higher rate of Black or African American individuals (6% of population) living in this tract than countywide (3%). The tract around SPSCC is about 25% people of color and 75% white, non-Hispanic.

South of Tumwater around Millersylvania State Park, 2.9% of renter households and 1.3% of homeowner households lack kitchen or plumbing facilities. In this area, 15.5% of the population is Hispanic/Latinx and 10.3% is two or more races.

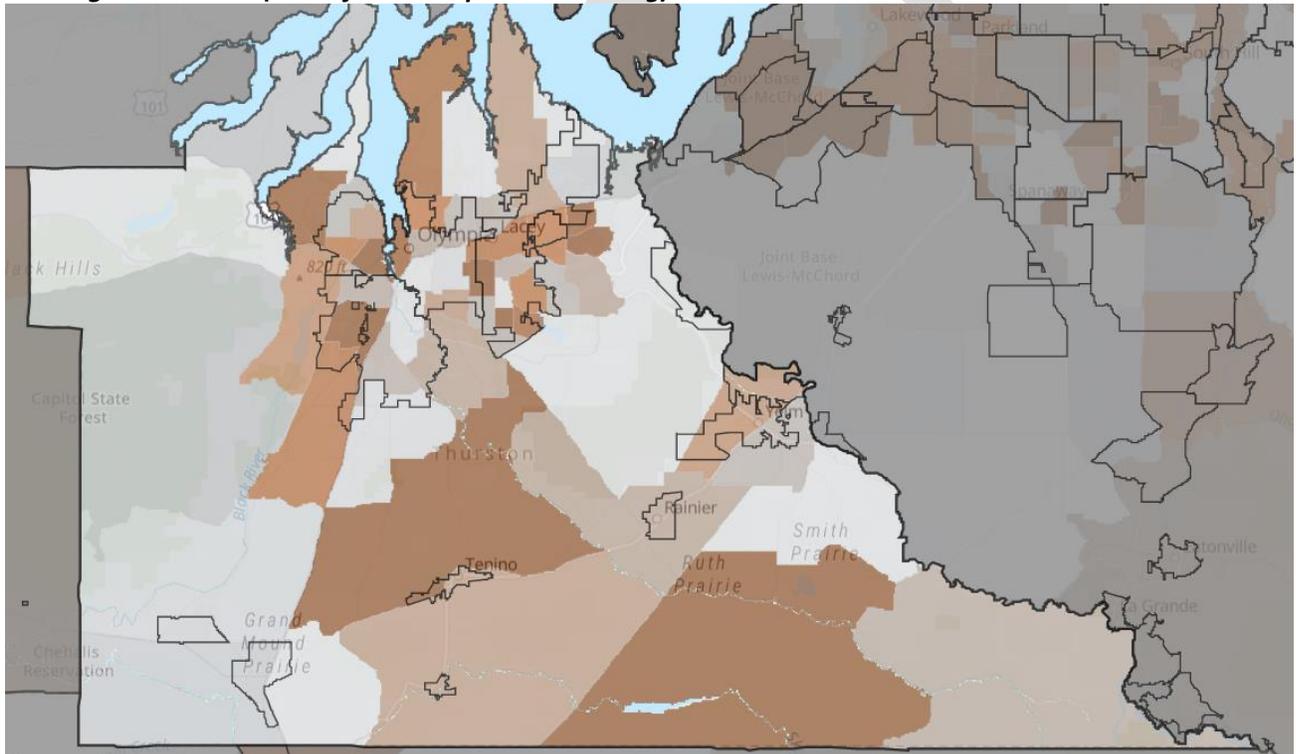
The tract around St. Martin’s University in Lacey, is 82% renter-occupied and 2.4% of renter households lack kitchen or plumbing facilities. About 33% of renter households are cost burdened. This area is about 36% people of color (not including white, Hispanic/Latinx individuals). The tract’s population is 17.3% Hispanic/Latinx, 10.9% Black/African American, 6.5% Asian, 5.2% two or more races, 2.7% Native Hawaiian or other Pacific Islander. Over 15% of the population was born outside the U.S, compared to about 8% countywide.

Cost Burden

Households are considered cost-burdened if they spend more than 30% of their income on housing, and are considered severely cost-burdened if they spend more than 50% of their income on housing.

The map below shows census tracts with the highest proportion of households (both renter and owner-occupied) that spend over 30% of their income on housing. Darker shading is used for higher numbers of cost burdened households.

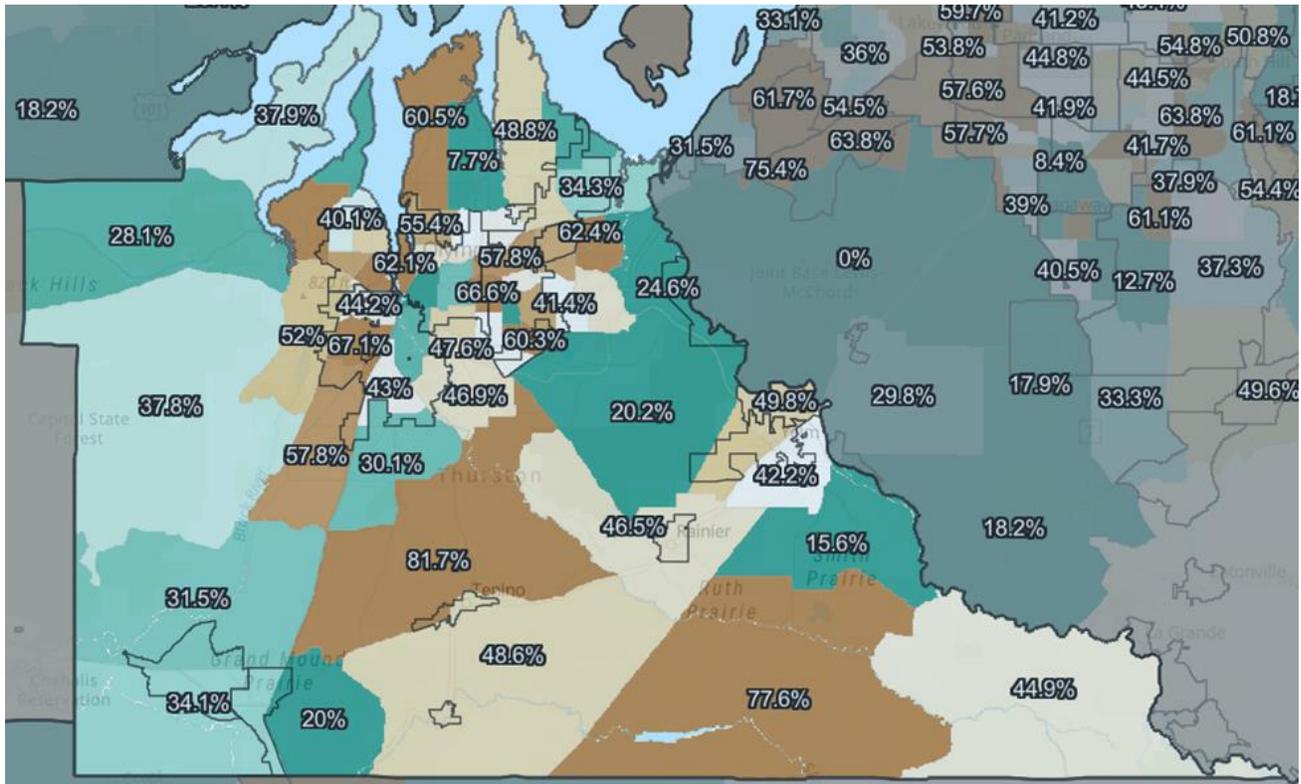
Housing Cost Burden (30% of income spent on housing)



Source: ACS 2016-2020

The map below shows numbers of renter households that are cost-burdened (pay more than 30% of income to rent). As indicated in the previous section, renters in Thurston County experience a much higher rate of housing cost burden than homeowners.

Renter cost burden (30% of income spent on housing)



The tract with the highest proportion of cost-burdened renter households in Thurston County is located north of Tenino. An estimated 81.7% of renter households are cost-burdened in the area north of Tenino in unincorporated Thurston County. This area has a high rate of homeownership (84.4%), so only about 15% of the population in this tract rents. This area is 84% white, non-Hispanic and 16% people of color. The tract's population is 7% Hispanic/Latinx, 7.3% two or more races, and under 2% each: Asian, Black or African American, American Indian and Alaska Native. About 9.1% of the population in this tract was born outside the U.S. Of the individuals born outside the U.S., about 40% were born in Europe and about 40% were born in Latin America.

An estimated 77.6% of renter households are cost-burdened in the tract along the SE border of Thurston County (south of Rainier). This tract has the highest rate of homeownership in the county (95.6%), so there is a relatively small sample size of renters, which may result in a higher margin of error. This area is over 95% white, non-Hispanic. The tract has the lowest population of people of color in the county.

In Lacey, the greatest numbers of cost-burdened households are located around Rainier Vista Community Park (bordered by Yelm Highway to the south, College Street to the west and Ruddell Road to the east). In this area, 76.2% of all renter households and 24.5% of all owner households with mortgages are cost burdened. This tract is closest to being a R/ECAP in Thurston County with over 41% population of people of color and over 23% of the population lives below the federal poverty level.

Two adjacent tracts in southwest Olympia have the highest proportion of households experiencing housing problems (around Capital Mall and the Auto Mall). Most households in these tracts are renters

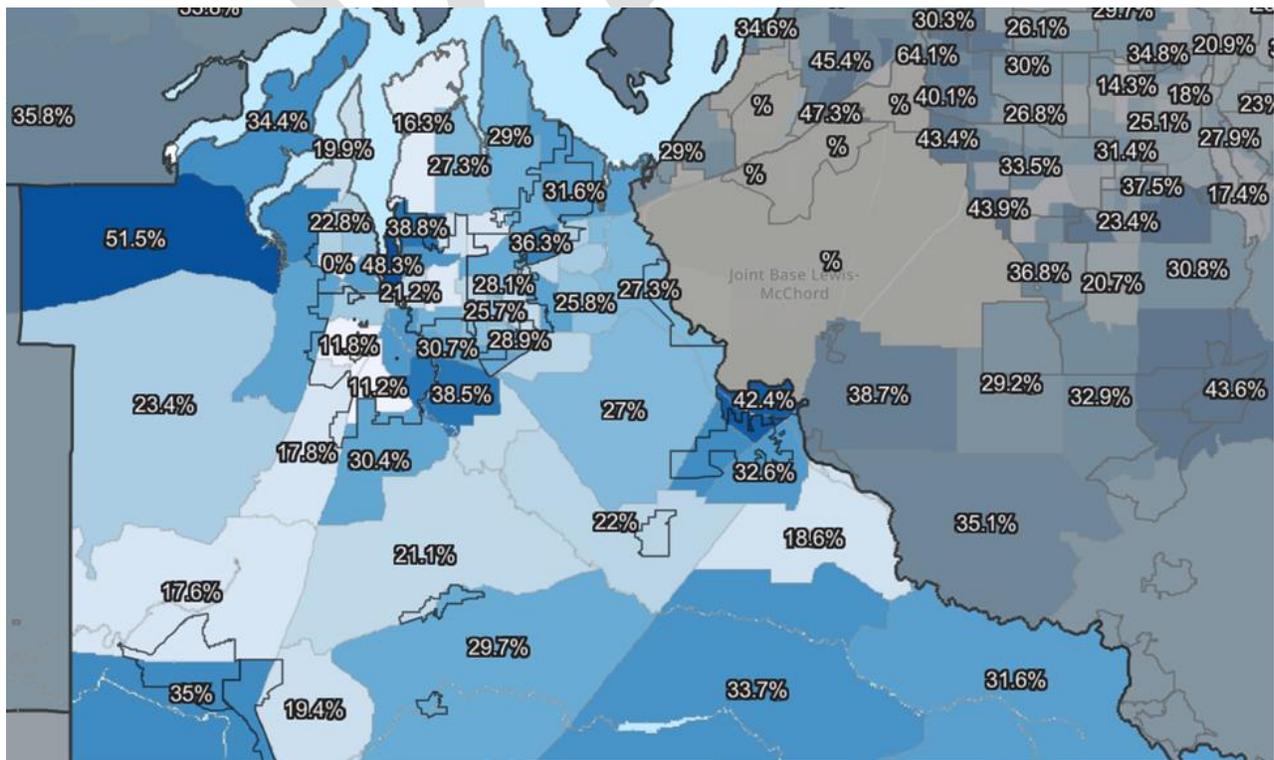
(82.4% and 74.1% of households are renters). In the tract around the Auto Mall (between Black Lake Boulevard and Capitol Lake), 69.3% of all renter households are cost burdened. Over 56% of renters around Capital Mall are cost burdened (nearly half of these renters are severely cost burdened). These tracts do not have disproportionate people of color populations, people with Limited English Proficiency, or born outside the U.S. They do have high rates of poverty. The tract around the Auto Mall is 88% white, non-Hispanic and 12% people of color (lower than the countywide average of 19% people of color).

In Tumwater, the greatest number of cost-burdened households are in the Belmore area south of SPSCC and west of Interstate 5. Here, 67.1% of all renter households are cost burdened. A higher concentration of residents identifying as Black or African American reside in this area: 7% of residents are Black or African American, compared to 3% countywide. About 86% of residents are white, non-Hispanic. According to HUD CHAS data, 44.4% of Black or African American renters in Tumwater are severely cost burdened (pay over 50% of their income to housing costs).

Just outside Olympia city limits in the area surrounding the Evergreen State College, 63.1% of all renter households and 36% of all owner households with mortgages are cost burdened. This area is about 68% white, non-Hispanic and 32% people of color (higher than the countywide average of 19%). The tract's population is nearly 16% Hispanic/Latinx (higher than the countywide average of 9.3%), about 8% Asian (compared to 5.7% countywide), 7% two or more races, 3.2% Black/African American, 1.6% American Indian or Alaska Native.

The map below shows numbers of homeowner households that are cost-burdened (pay more than 30% of income to housing costs).

Homeowner cost burden (30% of income spent on housing)



The highest homeowner cost burden is in the area around Summit Lake south of Mud Bay. About 51.5% of homeowner households with a mortgage are cost burdened in this tract. The homeownership rate here is about 83% and the population is about 84% white, non-Hispanic.

In Olympia, the greatest number of cost burdened owner households (with mortgages) are in downtown Olympia (48.3%). About 23% of the downtown area population are homeowners. Additionally, 62.1% of all renter households are cost burdened. Downtown Olympia is predominantly white (around 85%), however, there is a higher rate of Black or African American individuals (6.2% of population) living in this tract than countywide (3%).

In North Yelm, the homeownership rate is nearly 70% and 42.4% of all owner households with mortgages are cost burdened. Nearly half of all renter households are cost burdened, as well. This area is predominantly white, non-Hispanic (84%).

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

According to 2021 HUD⁵⁴ data, 23% of Project-Based Section 8 participants in Thurston County are families with children. About 22% of Project-based Section 8 units have 2-bedrooms and 17% have 3+ bedrooms.

About 30% of the Housing Choice Voucher program (HCV) participants are families with children. The HCV Program is 38% 2-bedroom units, and 22% are 3+ bedroom units.

Many of the Low-Income Housing Tax Credit properties, USDA Rural Development properties, and other affordable units in Thurston County are either targeted for seniors and people with disabilities, or families with children.

The Housing Authority of Thurston County maintains a waiting list, which was last opened in 2020 for new applicants. Of the 1,252 current applicants on the waitlist, 515 are families with children.

Availability of 2-3+ bedroom units is also a racial equity issue. According to the TRPC's Housing Needs Assessment for Lacey, Olympia and Tumwater, 49% of households headed by a person of color contain three or more people compared to 30% of households headed by a person who is white, non-Hispanic.

A higher proportion of families with children live in overcrowded housing situations, according to the community fair housing survey. About 77% of community survey respondents living in overcrowded housing conditions are pregnant or have children under the age of 18 living with them, while only 31% of overall survey respondents have children living with them.

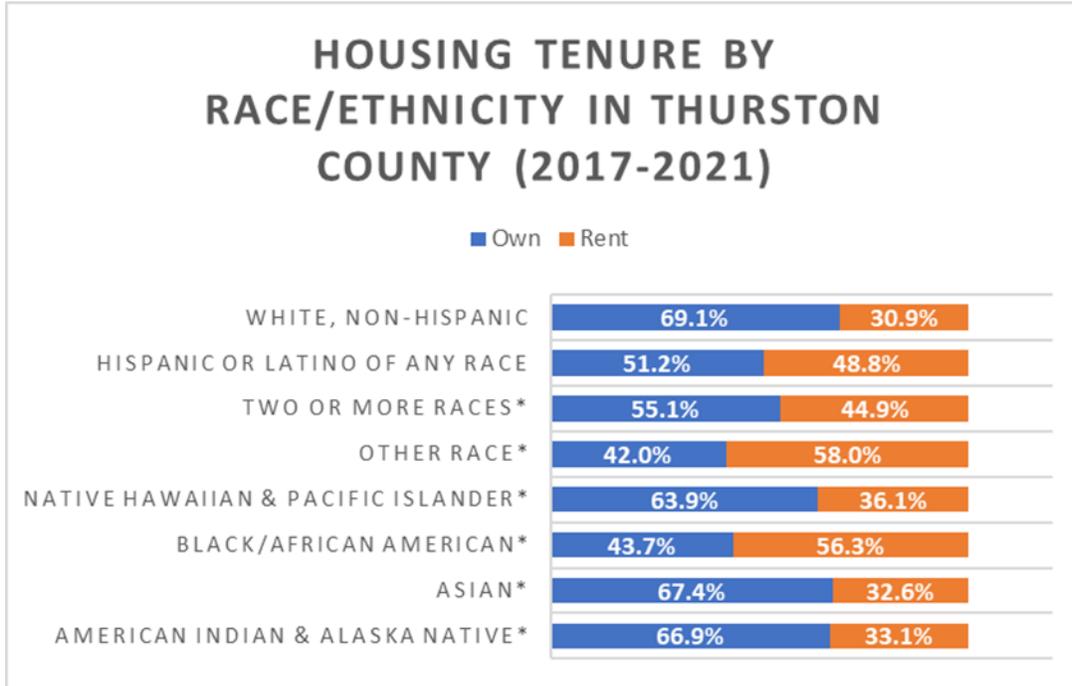
d. Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and region.

In September 2022, the Washington State Department of Commerce released its report 'Improving Homeownership Rates for Black, Indigenous, and People of Color in Washington: Recommendations

⁵⁴ https://www.huduser.gov/portal/datasets/assthsg.html#2009-2021_query

from the Homeownership Disparities Work Group.⁵⁵ According to the report, 2,866 Black, Indigenous and People of Color households would need to become homeowners in Thurston County to equal the rate of white, non-Hispanic homeownership.

In Thurston County, the homeownership rate for white, non-Hispanic households is 69.1%, while the people of color homeownership rate is 57.6%. The homeownership rate is lowest for Black or African American households (45.3%).



Source: TRPC,⁵⁶ U.S. Census Bureau: American Community Survey

⁵⁵ <https://deptofcommerce.box.com/s/zqs8xhdhskn4mvma9tp3a42xmc19slch>

⁵⁶ <https://data.census.gov/cedsci/> Tables B25003, B25003a thru B25003H

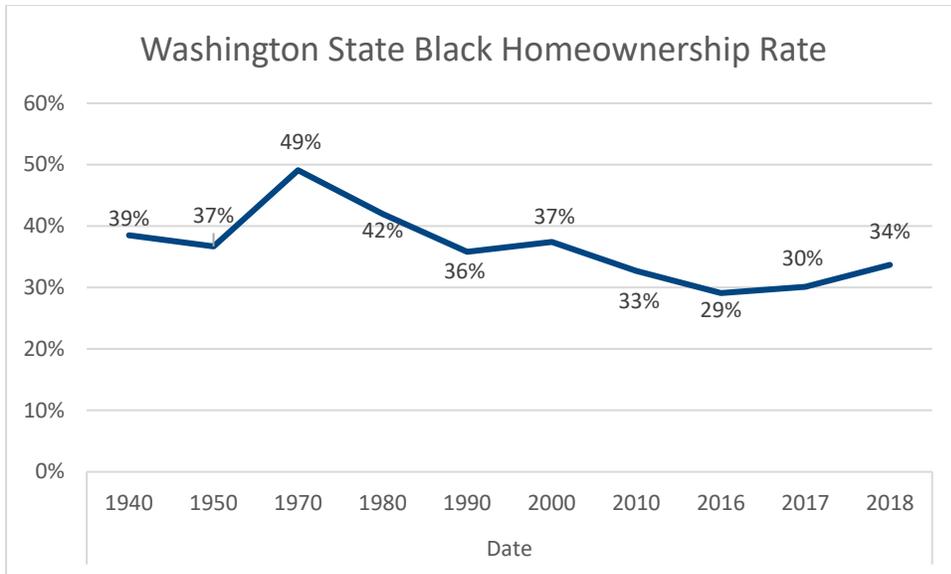
Over time, homeownership has increased most significantly for American Indian & Alaska Native households and has decreased most sharply for Native Hawaiian & Pacific Islander households. The table below shows the percentage of households who own their home by race and ethnicity in Thurston County.

Race/Ethnicity of Householder	2006-2010	2007-2011	2008-2012	2009-2013	2010-2014	2011-2015	2012-2016	2013-2017	2014-2018	2015-2019	2016-2020	2017-2021
American Indian or Alaska Native	47.5%	43.7%	44.3%	51.9%	50.6%	56.1%	63.0%	62.2%	60.4%	61.5%	61.0%	66.9%
Asian	67.7%	63.9%	65.6%	61.6%	61.5%	62.6%	64.0%	60.7%	61.6%	68.4%	67.0%	70.2%
Black/African American	47.6%	42.0%	38.5%	40.9%	42.2%	43.5%	46.0%	46.5%	47.3%	42.1%	48.5%	45.3%
Native Hawaiian or Pacific Islander	65.8%	55.1%	55.7%	54.8%	52.3%	50.1%	52.7%	49.2%	48.6%	51.0%	47.6%	51.5%
Other Race	44.7%	51.2%	55.0%	64.1%	55.6%	57.3%	62.3%	58.1%	51.5%	50.8%	61.9%	58.0%
Two or More Races	56.9%	53.3%	52.9%	49.5%	49.6%	45.6%	40.6%	41.0%	41.8%	44.7%	48.3%	55.5%
Hispanic or Latino of Any Race	47.6%	49.7%	52.6%	54.1%	50.4%	48.5%	52.8%	52.5%	49.8%	51.2%	52.5%	51.0%
Race/Ethnicity of Householder	2006-2010	2007-2011	2008-2012	2009-2013	2010-2014	2011-2015	2012-2016	2013-2017	2014-2018	2015-2019	2016-2020	2017-2021
Person of Color	55.7%	53.2%	53.6%	53.7%	52.4%	51.9%	53.7%	52.8%	52.2%	54.0%	55.9%	57.6%
White, Non-Hispanic	69.4%	69.9%	70.0%	69.3%	67.3%	67.2%	66.0%	66.3%	66.2%	68.0%	68.4%	69.1%
Total Population	67.4%	67.4%	67.5%	66.8%	64.9%	64.6%	63.8%	63.9%	63.7%	65.4%	66.0%	66.8%

Source: TRPC,⁵⁷ U.S. Census Bureau: American Community Survey

In Washington State, homeownership by Black or African American households has been decreasing over several decades (homeownership was at its highest at 49% in 1970, just after the 1968 passage of the Fair Housing Act).

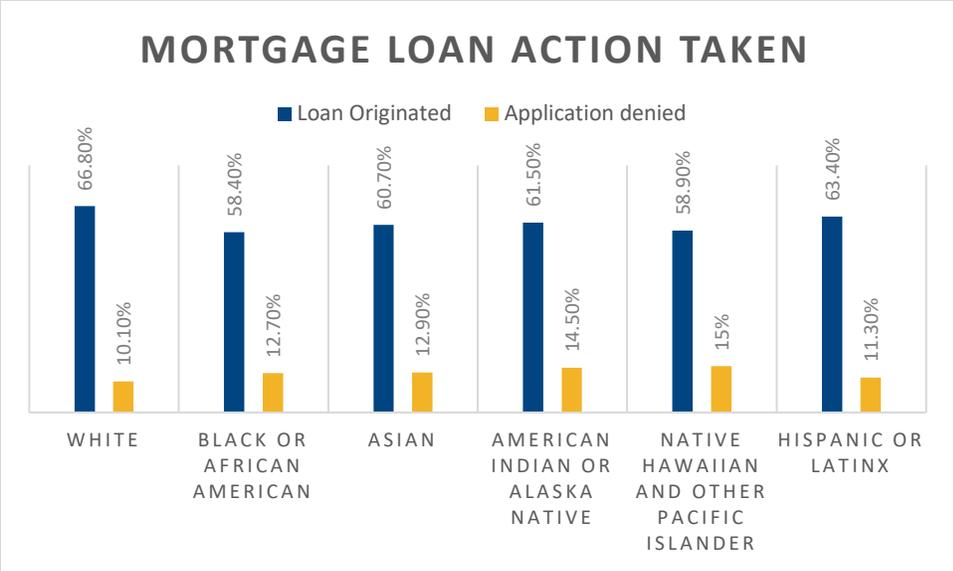
⁵⁷ <https://data.census.gov/cedsci/> Tables B25003, B25003a thru B25003H



Source: U.S. Census

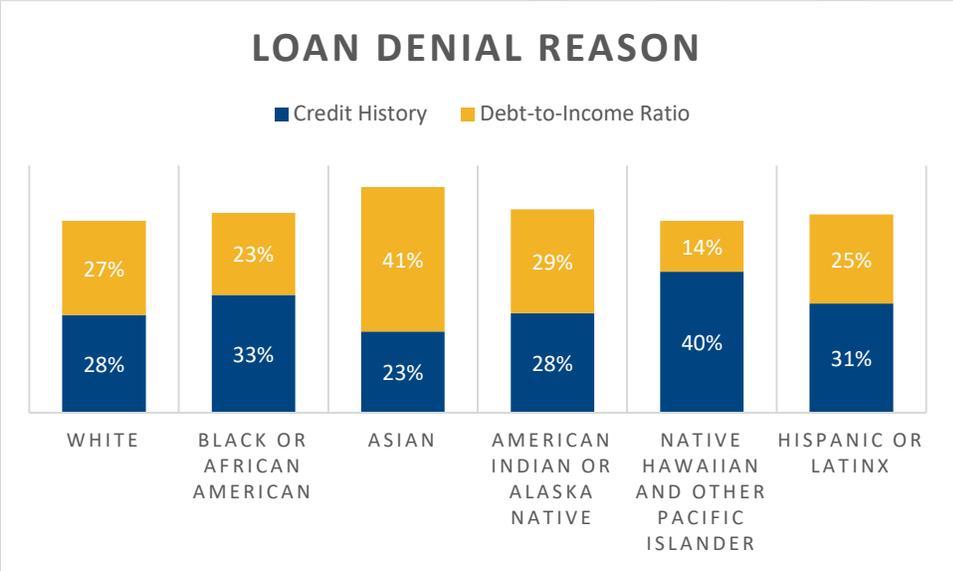
Access to loan products can impact ability to purchase homes, especially in a competitive housing market. Conventional loans are most desirable for home sellers, as they have the fewest requirements and are easiest to finance. According to 2018-2021 Home Mortgage Disclosure Act (HMDA) data for Thurston County, white residents were more than twice as likely as Black or African American residents to obtain a conventional mortgage. About 67% of white residents obtained a conventional mortgage compared to about 30% of Black or African American and 35% of Native Hawaiian or other Pacific Islander residents. Black or African American residents were most likely to use a VA loan. About 60% of Black or African American residents obtained a VA loan compared to about 24% of white residents. American Indian or Alaska Native residents were provided Federal Housing Administration (FHA) loans at the highest rate (18%). Among all racial groups, 45% of Hispanic or Latinx applicants obtained a conventional mortgage compared to 66% of applicants who are not Hispanic or Latinx. A larger proportion of Hispanic/Latinx applicants used VA loans (44%) and FHA loans (12%) than applicants who are not Hispanic/Latinx.

The figure below shows mortgage loan approval and denial by race in Thurston County from 2018-2021. White residents were approved at the highest rate (66.8%), while Native Hawaiian or other Pacific Islanders were denied at the highest rates (15%).



Source: 2018-2021 Home Mortgage Disclosure Act data⁵⁸

Across race and ethnicity, credit history and debt-to-income ratios were the most reported reasons for denying a mortgage loan. Rejection due to credit history was most common for Native Hawaiian or other Pacific Islander and Black or African American applicants. Rejection due to debt-to-income ratio was most common for Asian applicants.



Source: 2018-2021 Home Mortgage Disclosure Act data⁵⁹

Among community survey respondents, people of color were denied mortgage loans at higher rates than white respondents. While about 20% of white respondents have ever been denied a mortgage

⁵⁸ <https://ffiec.cfpb.gov/data-browser/>

⁵⁹ <https://ffiec.cfpb.gov/data-browser/>

loan, nearly 35% of Black or African American respondents (10 individuals) and 32% of Hispanic/Latinx respondents (12 individuals) have been denied a mortgage loan. About 28% of Asian respondents (8 individuals) and 23% of American Indian or Alaska Native respondents (8 individuals) have been denied mortgage loans. Credit history and debt to income ratios were the most common rejection reasons for people of color and income level was the most common reason for white respondents. Black or African American respondents were most likely to report they had difficulty accessing a loan.

White and Asian respondents were most likely to report that their parents or family of origin have owned a home. Over 87% of white respondents and 83% of Asian respondents reported their parents/family of origin owned a home, compared to 68% of Hispanic/Latinx respondents, 50% of Native Hawaiian or other Pacific Islander, 77% of American Indian or Alaska Native respondents and 79% of Black or African American respondents. Asian respondents were most likely to report that they had help from family to purchase a home and to receive financial help from a program or organization to buy a home (such as a down payment assistance program). Intergenerational wealth that has been accumulated through home ownership is often passed on to help children of homeowners purchase their own home.

Black or African American and Hispanic/Latinx respondents were more likely to report that their real estate agent directed them toward or away from particular neighborhoods or areas.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

According to American Community Survey data, between 2015 and 2020 the number of single parent-headed households with children who were renting in Olympia increased. About 62.5% of single male-headed households with children in Olympia are renters and 81.7% of single female-headed households in Olympia are renters.

While 57% of white survey respondents are renters, 78.3% of Black or African American respondents are renters and 73.3% of American Indian or Alaska Native respondents are renters. All three (100%) respondents who are Middle Eastern or North African are renters and 66.7% of Native Hawaiian or Pacific Islanders are renters. Asian respondents were the only group that were majority homeowners: 46.4% of Asian respondents rent. Seventy percent of respondents who were born outside the U.S. rent rather than own their homes. About 93% of transgender respondents rent, rather than own their homes. About 66% of respondents who have a disability (or have a family member with a disability living with them) rent rather than own their homes. About 57% of families with children who responded to the survey are renters rather than homeowners.

Renters were more likely to experience an increase in housing costs in the previous year than owners. Nearly 75% of renters who responded to the community survey have had a rent increase in the past year, compared to 42% of homeowners. Renters were more likely to experience a larger monthly increase than owners. About 21% of renters experienced a rent increase of \$300 or more per month in the past year, while about 8% of homeowners experienced increase of \$300 or more per month in their mortgage payment. Roughly 36% of renters feel they could be at risk of eviction or foreclosure in the

next 6 months, compared to about 3% of homeowners. About 51% of renters lost income due to COVID, compared to about 30% of homeowners.

Over 20% of community survey respondents (130 individuals) pay 50% or more of their income to housing costs (considered severely cost burdened). About 35% of severely cost burdened respondents live alone, about 55% live in a 2-4 person household, and 10% live in a household with 5 or more people. Of the 13 severely cost burdened respondents who live in a household with 5+ members, 2 are Hispanic/Latinx, 2 are American Indian or Alaska Native, 8 are white, and 1 preferred not to say. Over 68% of severely cost burdened respondents either have a disability or someone in their household has a disability. About 17% of severely cost burdened respondents are over age 65, while only 14% of the total 613 respondents are over age 65. While 5.1% of total survey respondents were born outside the U.S., 6.9% of severely cost burdened respondents were born outside the U.S. Three severely cost burdened respondents were born in Mexico, 1 in China, 1 in Russia, 1 in Colombia, 1 in Germany, 1 in Liberia, and 1 on a military base in Korea.

Nearly 4% of respondents who are severely cost burdened are transgender, compared to 2.6% of the total 613 respondents to the survey. About 5.4% of respondents who are severely cost burdened are non-binary, compared to 4.6% of the total 613 respondents to the survey.

A focus group⁶⁰ was held in 2019 for transgender individuals who were assigned male at birth and identified as trans women or non-binary. Of those 44 individuals, 59% have a disability and 20% are people of color. For participants of color, 89% had experienced housing insecurity with an average of 18 months per episode and 89% had transportation barriers. One participant noted: *'I am disabled and on SSI. I get \$770 a month. I am homeless in my van. I cannot afford a home. I am receiving increasing harassment.'* Trans-expansive medical care and employment issues were key themes that arose for participants. Sixty-five percent of participants experienced unemployment or underemployment in 2019.

A survey respondent shared the experiences of a friend who was transgender and died by suicide, after experiencing housing discrimination, homelessness, and rejection of rental applications due to her credit history. This community member felt she was being treated differently by apartment management and experienced harassment by other residents due to her gender identity. The landlord decided not to renew her lease agreement. She was receiving assistance through local organizations to help pay rent but struggled to find a housing unit because her applications were rejected due to credit history (she had recently been through cancer and a divorce, which negatively impacted her credit score). Local organizations provided temporary hotel vouchers, but those ran out and she knew homelessness was coming. Her friend indicated that she needed help finding places to rent and that even with rent support and disability income, was not able to locate housing.

Homelessness in Thurston County

The 2020 Point in Time (PIT) Count found that people of color were overrepresented among those experiencing homelessness in Thurston County. According to the PIT, 7% of individuals experiencing

⁶⁰ The focus group was a collaborative partnership between Heartspark Press, PacMtn Workforce Development, Pizza Klatch, UNITE, Gender Justice League

homelessness were Black or African American (over twice the general population), 4% were Native American/American Indian individuals (four times the general population), and 10% were multiple races (almost twice the general population). Roughly 70% of individuals experiencing homelessness in Thurston County have a disability, compared to 14% of the general population.

The 2020 PIT also revealed that the LGBTQ+ population is overrepresented in Thurston County's homeless population: 12% of respondents self-identified as LGBTQ+ compared to a national average of around 4.5% of the general population. The 2020 PIT also revealed that about 2.1% of individuals experiencing homelessness self-identified as transgender or non-binary, although underreporting may be an issue, as violence experienced by the community may lead to reluctance to self-disclose gender identity to a stranger conducting the survey. The U.S. Census and American Community Survey data does not include questions about gender identity. The UCLA Williams Institute estimates that 0.56% of Washington adults are transgender. The Williams Institute does not conduct estimates for individuals who identify as non-binary.

Sixteen of 613 total online survey respondents are currently experiencing homelessness. An additional 23 respondents indicated that they are staying with family or friends. While a small sample size, the survey respondents reflected disparities in the local population of people experiencing homelessness. Black or African American, American Indian or Alaska Native, women, people with disabilities and LGBTQ+ community members who responded to the survey were more likely to be experiencing homelessness or staying with family/friends. Of these combined 39 survey respondents:

- 1 lives in Rainier, 2 in Yelm, 2 in Rochester, 2 in Tenino, 2 in Tumwater, 3 in Lacey, and 27 in Olympia⁶¹
- 4.7% of the total 613 survey respondents are Black or African American compared to 7.7% of the 39 survey respondents who indicated they are experiencing homelessness or staying with family/friends
- 5.7% of the total 613 survey respondents are American Indian or Alaska Native compared to 7.7% of the 39 survey respondents who indicated they are experiencing homelessness or staying with family/friends
- 28 identified as female (71.8% of the 39 respondents compared to 64.8% of the total 613 respondents)
- 10 identified as bisexual/pansexual (25.6% of the 39 respondents, compared to 12.4% of the total 613 respondents)
- 79.5% of the 39 respondents indicated they or someone in their household has a disability, compared to 53.5% of total 613 respondents.

The most reported cause of homelessness in the 2020 PIT was eviction or loss of housing, which was experienced by about 17% of respondents. Nearly 15% of respondents reported that job loss or unemployment caused their homelessness. A combined 262 (26%) respondents reported their homelessness was caused by a disability-related reason (substance dependency, physical disability or mental health). Over 50 respondents reported that their experience of homelessness was caused by

⁶¹Considering Olympia residents were overrepresented in the survey, this represents about 7% of all Olympia residents who responded to the survey

domestic violence. While disability is explicitly protected by fair housing laws, HUD and fair housing case law have affirmed that domestic violence survivors may be subject to protections under fair housing laws on the basis of sex/gender (because DV survivors are disproportionately women)⁶².

A survey respondent states: *'I have been evicted up to three times and had been homeless including now. Rent and income have always been an issue.'*

Of the 39 respondents experiencing homelessness or staying with family/friends, 11 were forced to move in the past 5 years due to a rent increase after their landlord completed repairs or renovations and 9 had been forced to move in the past 5 years because their landlord sold the property. Four were forced to move because their housing unit was condemned, demolished, or destroyed (due to fire, flood, etc) and 2 lost jobs that provided a housing unit. Under other, respondents described a domestic violence situation that forced them to move, an eviction, and five circumstances related to the COVID-19 pandemic. These examples highlight the economic impacts of COVID-19, which made shared housing situations or ability to pay rent untenable:

- *'Covid made me homeless and I was told I could receive even the stimulus because I didn't have a residency with a proper mailing address'*
- *'Roommate was inviting people over during the pandemic'*
- *'Lost roommates due to Covid and couldn't afford the rent on my own. It was traumatic.'*
- *'Covid pandemic - couldn't afford rent'*
- *'Landlord made housing unlivable in regards to COVID'*

As a result of the disproportionate number of people of color experiencing homelessness in Thurston County, social service providers have made intentional steps toward equity in housing and shelter placement. Countywide housing and homeless services providers were using a Vulnerability Index (VI-SPDAT) to prioritize individuals for shelter and housing placement based on their vulnerability when living unsheltered. According to Interfaith Works Homeless Services: *'After utilizing the VI-SPDAT for three years and using it with so many more people than the original pilot pool (130 people in 2014 for placement into 30 low-barrier shelter beds), it became clear that predominantly white, cisgender males were scoring the highest on the vulnerability index. This created an imbalance in how precious permanent housing and shelter resources were being allocated, and further exposed the large racial disparity in the Thurston County Homeless response system. Nearly 40% of people entering the system are Black, Indigenous and all People of Color, while the people exiting to shelter and housing at the highest rates are predominately white.'*⁶³

Providers formed a VI Research Team and reviewed the "Coordinated Entry Systems Racial Equity Analysis of Assessment Data" study published by C4 Innovations to incorporate best practices into an updated Housing Equity Assessment Tool (HEAT) to replace the VI-SPDAT. The VI Research Team added the following vulnerabilities into the new tool: "prior child welfare involvement and foster care history,

⁶²<https://www.hud.gov/sites/documents/FHEODOMESTICVIOLGUIDENG.PDF#:~:text=This%20memorandum%20provides%20guidance%20to%20Fair%20Housing%20and,basis%20of%20the%20violence%20perpetrated%20by%20their%20abusers>

⁶³ <https://www.iwshelter.org/blog>

criminal justice and juvenile justice involvement, history of trauma and adverse childhood experiences, and eviction histories.” With this information in mind, and a wealth of lived and professional experience, the Thurston County group developed a new assessment tool (The Housing Equity Assessment Tool - HEAT).

Thurston County has also contracted with consultants to help form a Lived Experience Committee, where people who have experienced homelessness and people representing diverse identities will inform policy and programmatic responses to homelessness in Thurston County. Additionally, there are an increasing number of emergency overnight shelters in Thurston County that are gender inclusive, do not require identification, and allow animals, which often aid a person with a disability. These policies help to create a more inclusive environment for trans, non-binary, undocumented and persons with disabilities.

Additionally, Thurston County mobilized to set up rent assistance programs that worked to prevent evictions during COVID. This included requirements that landlords who received rent assistance payments agreed not to evict or raise rents for a period of time. Thurston County also contracted with By and For agencies (such as CIELO, which serves primarily Latinx and immigrant communities) to ensure equitable distribution of the funds.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs.

Thurston County has been experiencing very low rental housing vacancy rates for several years. Low vacancy rates in combination with high rental prices have created a very competitive market, where there is less flexibility for tenants with barriers such as low or no credit, previous evictions, high debt to income, or other screening challenges. The median home price in 2021 in Thurston County was \$455,000.⁶⁴ According to the Department of Commerce report⁶⁵ on homeownership disparities, ‘from 2000 to 2020, the median home price in Washington increased 157%, and from 2019 to 2020, median home prices increased 13.7% in just one year.’

According to the report ‘Explaining the Black-White Homeownership Gap’ by the Urban Institute,⁶⁶ ‘more than 50 percent of white households have a FICO credit score above 700, compared with only 20.6 percent of black households. Thirty-three percent of black households with credit histories have insufficient credit and lack a credit score, while only 17.9 percent of white households have missing credit scores.’ The report goes on to explain: ‘This is a key point because in the housing context, we know that most black households are renters and that rental payments are largely unreported to traditional credit bureaus. A black household may not own a home and pays only for rent, utilities, cell phones, and similar recurring expenses, but these transactions are not reported to credit bureaus in any positive way. Derogatory and negative credit reporting is common, but no credit is given for on-time payments of such critical and basic household items that would continue to apply in ownership.’

⁶⁴ <https://www.trpc.org/455/Thurston-County-Home-Sales>

⁶⁵ <https://deptofcommerce.box.com/s/zqs8xhdhskn4mvma9tp3a42xmc19slch>

⁶⁶ https://www.urban.org/sites/default/files/publication/101160/explaining_the_black-white_homeownership_gap_2.pdf

According to the Department of Commerce report on homeownership disparities, ‘debt-to-income ratios (DTIs) are the most common reason Black applicants are denied loans. Lack of credit and poor credit present as barriers to accessing a lower interest rate loan for many prospective buyers of color. Researchers highlight how “decades of discrimination in employment, lending policies, debt collection, and criminal prosecution have left generations of Black families vulnerable to financial insecurity and negatively impacted median credit scores.”’

In consultation with community advocates, credit history has been identified as a common barrier to accessing housing (both rental and ownership) for multiple protected class groups. There is a gap in credit counseling and debt repair programs in Thurston County. Domestic violence survivors often experience financial abuse, which may include a perpetrator opening credit cards or bank accounts in the survivor’s name. Community members with disabilities often have medical debt. Undocumented community members lack a Social Security number, are often paid in cash, and have difficulty establishing credit history.

One community survey respondent suggested that community members who do not have U.S. citizenship should be able to use an ITIN (individual tax identification number) to apply for a mortgage. Due to barriers and cost of the legal process, CIELO reported that many undocumented community members do not have an ITIN or work permit. Many undocumented community members purchase homes by using a family member’s name who has credit history. Vacancies spread quickly by word of mouth among undocumented community members, where housing opportunities lack some of the typical screening barriers. Community members who have limited English proficiency have difficulties understanding lease documents or notices. They may be fined due to violating a rule they did not understand or self-evict when they receive a notice (assuming they must pay or vacate when a 14-day pay or vacate notice is posted).

A local case manager noted that criminal history is a significant barrier for many veterans experiencing homelessness and that most property managers deny any type of criminal history, even though HUD guidance states that blanket bans on criminal history may violate fair housing laws. Many survey respondents noted the challenges they face due to screening barriers:

- *‘Landlords are taking the “rent should only be a third of your income” and turning it into “you cant live here unless you make 3x the rent”. Most people cannot independently show that much income, so adults are having to live in roommate situations with strangers.’*
- *‘Due to the continually higher cost of application fees I feel a lot of landlords who see any risk use that standard to keep the fee and deny the applicant much more often now days. I have spent well over \$400 in just application fees and have been denied multiple times due to lack of credit. After 3 months of looking for a place to live I am now sleeping on the sidewalk.’*
- *‘My Mother has an eviction in Her name from the past and it is causing Us to be unable to add Her to the lease or get assistance that includes Her because She's unable to be added to Our lease. Our official household size is 4 but She does basically live with Us without being on Our lease.’*
- *‘Our county needs more housing opportunities for people with criminal backgrounds that have had past evictions related to substance abuse and cheaper housing for those that only make*

minimum wage that is affordable for people working to better themselves. Everything is way way too expensive and I'm paying off past debts so even though I work full time I can't afford to pay much for housing.'

The majority of community survey respondents stated that their housing goal in the next 6 months was to stay in their current housing unit. Around 40% of American Indian or Alaska Native and Hispanic/Latinx respondents indicated that their housing goal was to move to a better unit or neighborhood in the next 6 months.

Race or Ethnicity of Respondent	TOTAL	Buy a home	Stay in my current housing	Move out from a shared housing situation	Move to a better unit or neighborhood	Age in place	Access group home or other institutional setting to get help to care for my needs	Access housing if unsheltered
White #	497	73	326	37	113	52	4	24
White %	100%	14.7%	65.6%	7.4%	22.7%	10.5%	0.8%	4.8%
Black or African American #	29	12	14	3	9	0	0	2
Black or African American %	100%	41.4%	48.3%	10.3%	31.0%	0.0%	0.0%	6.9%
Asian #	29	3	24	1	3	4	0	0
Asian %	100%	10.3%	82.8%	3.4%	10.3%	13.8%	0.0%	0.0%
American Indian or Alaska Native #	35	7	16	6	15	1	0	4
American Indian or Alaska Native %	100%	20.0%	45.7%	17.1%	42.9%	2.9%	0.0%	11.4%
Hispanic/Latinx #	37	10	20	6	14	0	1	3
Hispanic/Latinx %	100%	27.0%	54.1%	16.2%	37.8%	0.0%	2.7%	8.1%
Native Hawaiian or other Pacific Islander #	6	0	3	1	1	0	0	1
Native Hawaiian or other Pacific Islander %	100%	0.0%	50.0%	16.7%	16.7%	0.0%	0.0%	16.7%

Respondents were asked what (if any) barriers kept them from meeting their housing goals. Cost of housing was listed as the number one barrier to meeting community survey respondents' housing goals. Over 55% of respondents reported that cost of housing was a barrier to meeting their housing goal. About 74% of American Indian or Alaska Native respondents, 69% of Black or African American respondents, and 67% of Native Hawaiian or other Pacific Islander respondents indicated cost of housing was a barrier to meeting their housing goal.

Race or Ethnicity of Respondent	cost of housing	application or screening barriers (criminal or credit history, lack of social security number)	accessibility of units available	voucher standards	unable to live independently without care or supports	lack of available units for my needs/family size	occupancy rules
White #	285	86	96	46	15	96	30
White %	57.3%	17.3%	19.3%	9.3%	3.0%	19.3%	6.0%
Black or African American #	20	7	7	4	0	7	3
Black or African American %	69.0%	24.1%	24.1%	13.8%	0.0%	24.1%	10.3%
Asian #	16	1	3	2	2	4	0
Asian %	55.2%	3.4%	10.3%	6.9%	6.9%	13.8%	0.0%
American Indian or Alaska Native #	26	12	8	10	3	18	7
American Indian or Alaska Native %	74.3%	34.3%	22.9%	28.6%	8.6%	51.4%	20.0%
Hispanic/Latinx #	23	9	6	2	2	7	3
Hispanic/Latinx %	62.2%	24.3%	16.2%	5.4%	5.4%	18.9%	8.1%
Native Hawaiian or other Pacific Islander #	4	2	2	1	0	2	1
Native Hawaiian or other Pacific Islander %	66.7%	33.3%	33.3%	16.7%	0.0%	33.3%	16.7%

Respondents were asked which screening or application barriers concern them. Most respondents selected their income is too low and debt to income ratios are a barrier. Nearly 45% of Asian respondents, 41% of Black or African American respondents, 35% of American Indian or Alaska Native respondents, 33% of white respondents, and 32% of Hispanic/Latinx respondents indicated their income is too low to meet their housing goals. Nearly 35% of Black or African American respondents and 31% of Asian respondents indicated their debt-to-income ratio is a barrier, compared to about 20% of white respondents. Credit history was the third most reported response. Black or African American, Asian, and Native Hawaiian or Pacific Islander respondents were more likely than white respondents to report that credit history was a barrier.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of Affordable Housing
- Source of income discrimination
- Other

Availability of affordable units in a range of sizes: According to the Housing Needs Assessment conducted by the Thurston Regional Planning Council (TRPC), there are approximately 1,857 housing units available at below market rents in Thurston County. This supply is far fewer than the 13,000 plus households with extremely low income (below 30% of area median income) and nearly 12,000 additional households with low income (between 30% and 50% of area median income). The Housing Authority of Thurston County (HATC) maintains a waiting list, which was last opened in 2020 for new applicants. There are currently 1,252 applicants on the waitlist. Of these 1,252 applicants, about 20% are Black or African American.

Washington’s current minimum wage is \$14.49/hour and will be increasing to \$15.74/hour in January 2023. The National Low Income Housing Coalition⁶⁷ estimates that a Thurston County renter earning minimum wage would need to work 57 hours per week to afford a 1-bedroom apartment, would need to work 68 hours per week to afford a 2-bedroom apartment, and would need to work 96 hours per week to afford a 3-bedroom apartment. The annual income needed in Thurston County to afford a 1-bedroom unit is \$43,040. Annual income of \$50,920 is needed to afford a 2-bedroom unit and \$72,320 is needed to afford a 3-bedroom unit in Thurston County.

The table below shows the percentage of Thurston County households earning under 30% and under 50% of Area Median Income by race/ethnicity, as a percentage of the total racial or ethnic group.⁶⁸

About 23% of all households in Thurston County earn under 50% of Area Median Income. Nearly twice as many Native American households earn under 50% AMI as white households in Thurston County. About 42% of all Native American households and 37% of all Hispanic/Latinx households earn under 50% AMI.

Thurston County Households Earning under 30% and under 50% of Area Median Income by Race/Ethnicity

Total Occupied Housing Units by AMI	TOTAL HOUSEHOLDS	White (includes white, Hispanic and white, non-Hispanic)	Black	Hispanic	Asian or Pacific Islander	Native American
TOTAL Households	109,985	89,495	3,045	6,790	5,523	1,339
Households AMI 0-30%	13,240	10,435	360	1,370	760	315
Percent AMI 0-30%	12.0%	11.7%	11.8%	20.2%	13.8%	23.5%
Households AMI 0-50%	25,003	19,635	730	2,480	1,598	560
Percent AMI 0-50%	22.7%	21.9%	24.0%	36.5%	28.9%	41.8%

Source: [Consolidated Planning/CHAS Data | HUD USER](#) (2015-2019 5-Year ACS Estimates)

The table below shows the percentage of Olympia households earning under 30% and under 50% of Area Median Income by race/ethnicity, as a percentage of the total racial or ethnic group.⁶⁹

Nearly one third of all Olympia households earn under 50% of AMI. Almost 87% of all Native American households living in Olympia earn less than 50% of AMI.

⁶⁷ <https://nlihc.org/oor/state/wa>

⁶⁸ Note that households earning under 50% of AMI includes households earning under 30% of AMI

⁶⁹ Note that households earning under 50% of AMI includes households earning under 30% of AMI

Olympia Households Earning under 30% and under 50% of Area Median Income by Race/Ethnicity

Total Occupied Housing Units by AMI	TOTAL HOUSEHOLDS	White (includes white, Hispanic and white, non-Hispanic)	Black	Hispanic	Asian or Pacific Islander	Native American
TOTAL Households	22,410	18,355	540	1,440	1,205	149
Households AMI 0-30%	3,619	2,800	185	315	255	64
Percent AMI 0-30%	16.15%	15.25%	34.26%	21.88%	21.16%	42.95%
Households AMI 0-50%	6,649	5,290	210	620	400	129
Percent AMI 0-50%	29.67%	28.82%	38.89%	43.06%	33.20%	86.58%

Source: [Consolidated Planning/CHAS Data | HUD USER](#) (2015-2019 5-Year ACS Estimates)

Displacement of residents due to economic pressures: Low-income residents and members of protected classes may be forced into more tenuous living arrangements, if they are not able to afford housing for their household. Community advocates and survey respondents described overcrowded or substandard living conditions, due to lack of affordable units. Several survey respondents noted that they are living in RVs that need repair, are staying in unsustainable temporary situations with friends or family, or unsafe arrangements. One survey respondent described their living situation as: *‘Living with an abusive creep in an unhealthy moldy home I can’t afford to leave and be safer anywhere else.’*

Lack of public investments in specific neighborhoods, including services or amenities: Lack of public investments are notable in South County areas such as Rochester. Rochester is unincorporated and does not have a sewer system, so all residential properties must use septic tanks, which inhibits opportunity for multifamily development and publicly funded housing. One 4-unit building burned down recently. Due to this lack of affordable multifamily units, affordable housing options include mobile homes, substandard single-family homes, or non-traditional situations. Many low-income community members rent or own mobile homes that are in need of repair. ROOF (Rochester Organization of Families) noted they receive a lot of requests for space heaters because people have no heat where they live.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, and Housing Choice Voucher (HCV)) in the jurisdiction?

Project-Based Section 8 housing in Thurston County that is referenced in this report is not Housing Authority of Thurston County (HATC) Housing Choice Voucher (HCV)-funded project-based housing. These units are privately owned and operated and receive a direct subsidy from HUD.

A review of HUD data indicates that 26% of households residing in Project-Based Section 8 housing in Thurston County are Asian or Pacific Islander, which is four times the Asian, Native Hawaiian or Pacific Islander percentage of the general population (6.6%). Data indicates that 33% of households residing in Project-Based Section 8 housing in Olympia are Asian or Pacific Islander, compared to 8.3% of the general population citywide. Asian and Pacific Islander are underrepresented in the Housing Choice Voucher program at 5% countywide and 6% in Olympia.

Black or African American households, while 3% of the general population, made up 11% of the Public Housing and 9% of the Housing Choice Voucher Program (HCV). Black or African American households are 4% of Project-Based Section-8 housing. Black or African American households comprised 11% of the Housing Choice Voucher Program recipients in the City of Olympia, compared to 2.8% of the general population. There are also a high proportion of Black applicants on the HATC waiting list for assistance (about 20% of applicants identified as Black or African American).

Hispanic/Latinx households are underrepresented in public housing (3%), Project-Based Section 8 (6%) and Housing Choice Voucher Program (8%) in Thurston County. Hispanic/Latinx households comprise 9.3% of the population in Thurston County and 9.9% of the population in Olympia.

Multiracial households are underrepresented in public housing (1%), Project-Based Section 8 (3%) and Housing Choice Voucher Program (2%) in Thurston County. Multiracial households comprise 7.8% of the countywide population.

ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

A disproportionately high number of Asian or Pacific Islander households reside in Project-Based Section 8 housing in both Olympia and countywide, however, that number is even higher in Olympia (33% of households living in Project-Based Section 8 housing in Olympia are Asian or Pacific Islander).

Native American, Hispanic/Latinx, and Black or African American households are represented at similar rates in publicly supported housing in Olympia compared to Thurston County. Black or African American households are represented at slightly higher rates in Housing Choice Voucher Program units in Olympia.

There are about 9% fewer white households in Project-Based Section 8 housing in Olympia compared to Thurston County.

iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Many programs, such as the Housing Choice Voucher (HCV) Program, require that households earn less than 50% of Area Median Income (AMI) to qualify for assistance.

A higher proportion of Black or African American households participate in the HCV program and public housing than the proportion of Black or African American households with income at or below 50% of AMI.

- 2.9% of households that are at or below 50% of AMI are Black, while 11% of public housing residents in Thurston County are Black.
- 2.9% of households that are at or below 50% of AMI are Black, while 9% of HCV participants in Thurston County are Black.

Hispanic/Latinx households are slightly underrepresented in all publicly supported housing (7% of all participants), but to a lesser degree in the HCV program.

- 9.9% of households that are at or below 50% of AMI are Hispanic/Latinx, while 6% of Project-Based Section 8 residents and 8% of HCV participants in Thurston County are Hispanic/Latinx.

About 6% of Thurston County households earning 50% AMI or less are Asian or Pacific Islanders, and about 6% participate in the HCV program. Asian or Pacific Islanders comprise 26% of Project-Based Section 8 housing residents and 11% of public housing residents in Thurston County. The HCV program represents a larger proportion of all assistance programs, so Asians or Pacific Islanders represent about 10% of all publicly supported housing residents.

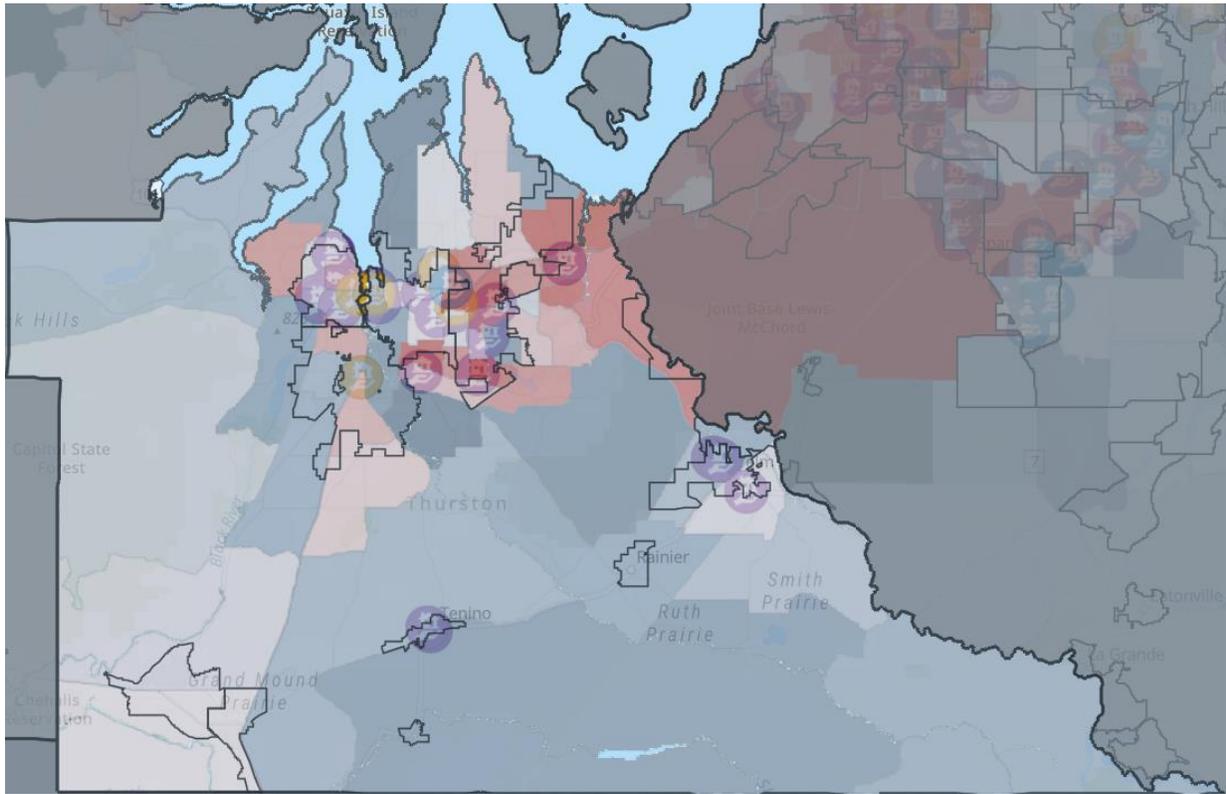
Native American households who earn less than 50% AMI are represented at equal rates in publicly supported housing in Thurston County.

b. Publicly Supported Housing Location and Occupancy

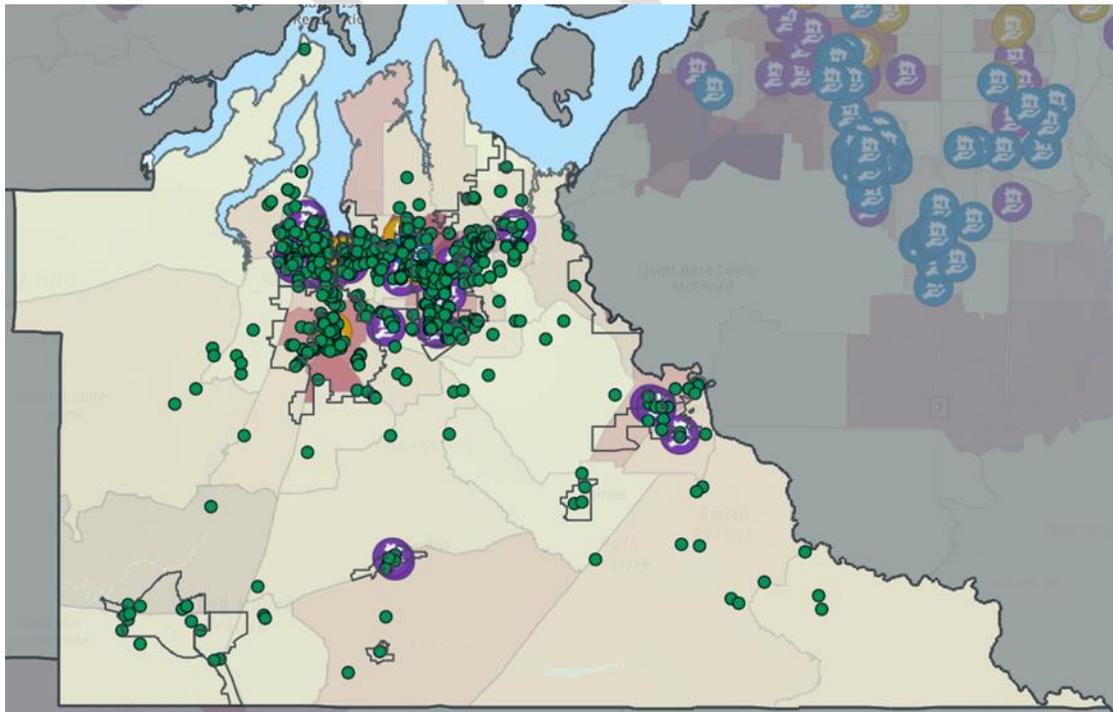
i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

Thurston County has no HUD identified R/ECAP areas and low segregation according to the Dissimilarity Index. The map below indicates that publicly supported housing is distributed throughout the populated areas of the County, but is concentrated in the urban core. These areas have better access to public transit, job opportunities, good schools, and other resources. In the South County areas of Tenino, Bucoda, and Yelm, about 3% of renter households have a Housing Choice Voucher. There are subsidized properties in Tenino and Yelm.

The map below shows publicly supported housing properties and shading that reflects the population of color. Red shading indicates higher percentage of residents of color.



The map below includes voucher holders in Thurston County, signified by a green dot.



There are very few voucher holders in the more sparsely populated areas around Capitol Forest (especially Summit Lake) and around the peninsulas of Puget Sound (likely due to high housing costs). In Olympia city limits, there are few or no voucher holders in the southeast around Wildwood and Washington Middle School. Many of these areas are majority white, non-Hispanic with fewer people born outside the U.S. or with Limited English Proficiency. These areas have few multifamily housing units. It can be difficult for voucher participants to locate single family homes or manufactured homes that meet program requirements. The Housing Choice Voucher (HCV) program restricts participants from paying more than 40% of their adjusted income towards rent and utilities. The HUD-set Fair Market Rents, which Public Housing Authorities utilize to set their local payment standards, has not kept pace with the increasing rents in the county. HATC has set its payment standards to the maximum allowed by HCV regulations. Most single-family homes or manufactured homes exceed HATC payment standards.

The areas with the highest concentration of housing choice vouchers are: southwest Olympia, east Olympia north of I-5, Tumwater (around Trosper Road and east of I-5), and pockets of Lacey that are south of I-5 (including Tanglewilde and around College Street). In southwest Olympia, there are 148 households using Housing Choice Vouchers in the tract around Yauger Park and Capitol Mall (24% of all renter households). In the neighboring tract between Black Lake Boulevard and Capitol Lake, there are 227 households using Housing Choice Vouchers (12% of all renter households). In east Olympia (north of I-5 between Plum Street and Lilly Road), there are 162 households using Housing Choice Vouchers (13% of all renter households). In these areas, there are a greater number of apartments and more affordable rents that would meet payment standards. Many of the areas where Housing Choice Voucher holders reside in Olympia have higher rates of poverty and housing cost burden. In Lacey, there are greater numbers of people of color in the areas around Tanglewilde and College Street.

Properties with Low-Income Housing Tax Credits (LIHTC) are primarily located in the urban core, but there are two properties in Tenino, and three properties in Yelm. There are several LIHTC properties in west Olympia, downtown Olympia, one property in the same tract as Rainier Vista Community Park, and scattered throughout Lacey. The tract in Lacey around St. Martin's University is 36% people of color and has two LIHTC properties (one is designated for 55+). The tract containing Rainier Vista Community Park is 41% people of color and 23% of the population has income below the federal poverty level. College Glen Apartments has a total of 164 two and three-bedroom units in this tract.

Section 202 (Project-Based Section 8 Housing) housing units primarily serve older adults in Thurston County. Section 202 properties are located in Tumwater around the airport (where 23% of the population is Hispanic/Latinx); in Lacey near St. Martin's University where the population is 36% people of color; by Providence St. Peter's Hospital (where 33% of the population has a disability); downtown Olympia and in southwest Olympia where there are higher rates of poverty and housing cost burden.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

Many of the properties with 2-3 bedroom units that serve families with children are scattered throughout the jurisdiction and region, while most of the publicly supported housing located in downtown Olympia is populated by single adults (seniors, people with disabilities and people exiting

homelessness). Many other properties that serve primarily seniors or people with disabilities are scattered throughout the county.

Many of the properties which serve people exiting homelessness are located in or near downtown Olympia and along Martin Way in Olympia. There are additional properties located in southwest Olympia and Tumwater with set-aside units for families with children exiting homelessness.

One survey respondent who identified as having a subsidy or voucher to help pay their rent stated: *'I feel like there is a lot of segregation. Having grown up here it's quite obvious. While you are thinking about how to fix this I think it's important to think about how you are perpetuating it currently. I see it a lot when it comes to where lowest income places are built (crappy area with no sidewalks or places to walk to) like Martin way merit manor, interfaith, devoe housing. Like for some reason all poor people housing is lumped together and away from other housing and amenities.'*

The Thurston Regional Planning Council (TRPC), cities of Olympia and Lacey completed a [Martin Way Corridor Study](#) that will create improved walkability, disability access to transit, landscaping, business development, and other enhancements to address some of the challenges that are highlighted by this survey participant.

There is one LIHTC property in the only census tract which is closest to being considered a R/ECAP in Thurston County (by Rainier Vista Community Park). That property is mostly comprised of larger unit sizes and likely mostly populated by families with children.

Overall, most publicly supported housing is located in close proximity to transportation, job opportunities and proficient schools. Some properties may experience higher rates of air pollution/diesel exhaust, due to their location along busy roads which also often serve as transit routes. As in the example above, Martin Way is a busy road with several affordable housing sites. The earlier section on Environmental Health highlights some of the census tracts that are most impacted by pollution from traffic.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

Thurston County has no HUD identified R/ECAP areas and low segregation according to the Dissimilarity Index. The map in the previous section indicates that publicly supported housing in all categories is distributed throughout the populated areas of the County.

Limited property-level demographic data was available for review at the time of this report to compare demographics of the building with the census tract where the property is located. Several Project-Based Section 8 property demographics were available for review and have been included in this section. Project-Based Section 8 properties in Thurston County are targeted to serve seniors and people with disabilities and receive funding from HUD to serve specific populations. As indicated in a previous section, HUD data reveals that Project-Based Section 8 programs in Thurston County have a disproportionately high number of Asian residents. Project-Based Section 8 housing in Thurston County that is referenced in this report is not Housing Authority of Thurston County (HATC) Housing Choice Voucher (HCV)-funded project-based housing. These units are privately owned and operated and receive a direct subsidy from HUD.

South Sound Villa (located in the same census tract as St. Martin's University) has a resident population that is 30% Asian, compared to 6.4% in the overall census tract. Only 3% of residents at South Sound Villa are Black or African American compared to 9.5% in the overall census tract. The property is nearly entirely over age 62 (99%), with one resident under age 62 who has a disability. Twenty-three percent of South Sound Villa residents over age 62 have a disability, while 50% of residents over age 65 in the census tract have disabilities. Just 1% of South Sound Villa residents are Hispanic/Latinx, while 15% of residents in the surrounding census tract are Hispanic/Latinx. This census tract has a 36% people of color population and 17% poverty rate.

Providence St. Francis House (located in the same census tract as St. Peter's Hospital) has a resident population that is 39% Asian, compared to 12% in the overall census tract. No Black or African American and Hispanic/Latinx residents are reported at St. Francis House, while the tract has a population that is 3.2% Black or African American and 1.4% Hispanic/Latinx. Three percent of residents are Native American, while ACS data does not indicate the presence of Native American residents in the tract overall. All residents are over age 62, but only 2% are reported to have disabilities. In the surrounding census tract, 55% of residents over age 65 have disabilities. The census tract has a high proportion of people with disabilities (33% of population), and a high poverty rate (27%).

Tumwater Apartments (located in the same tract as the Olympia airport) has a resident population that is 2% Hispanic/Latinx, compared to 23.6% in the overall census tract. Four percent of residents are Asian, compared to 2.2% of the population in the surrounding census tract. Six percent of residents are Native American, while ACS data does not indicate the presence of Native American residents in the tract overall. At Tumwater Apartments, 96% of residents are over age 62 and 9% of those residents report having disabilities. In the tract, 59% of people over age 65 have disabilities. The tract has a 15% poverty rate.

The Olympian Apartments (located in downtown Olympia) has a resident population that more closely mirrors the surrounding census tract. Two percent of residents are Hispanic/Latinx, while 4.4% of the overall tract's population is Hispanic/Latinx. Two percent of residents are Asian, while 3.2% of the overall tract's population is Asian. Four percent of residents in the property and in the tract are Black/African American. Just over half of Olympian Apartments residents are over age 62 and 20% percent of residents over age 62 have a disability, while 37% of the tract's 65+ population has a disability. The tract has a 9.8% poverty rate.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

Demographic information was not available for the Low-Income Housing Tax Credit programs. Thurston County does not have any RAD housing (RAD is the conversion of public housing to HCV project-based voucher housing).

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

The HCV program and Project-Based Section 8 housing received targeted funding to serve persons with disabilities. For the HCV program, because of target funding, a disproportionate number of households have a person with a disability. As a result, there is a higher proportion of residents with disabilities in publicly supported housing than in the general population. HUD data indicates that 71% of households in public housing, 21% of households in Project-Based Section 8 housing, and 41% of households in the Housing Choice Voucher program have at least one household member with a disability. About 14% of Olympia and countywide residents have a disability. In publicly supported housing in Olympia, there are slightly higher rates of persons with disabilities. Twenty four percent of households in Project-Based Section 8 housing in Olympia and 44% of households in the Housing Choice Voucher program in Olympia have a disability.

There is a similar proportion of families with children residing in publicly supported housing as Olympia and Thurston County overall.

v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

As indicated previously, limited property-level demographic data was available for review at the time of this report to compare demographics of the building with the census tract where the property is located. Several Project-Based Section 8 property demographics were available for review and have been included in this section. Most Project-Based Section 8 properties in Thurston County are targeted to serve seniors and people with disabilities. As indicated in a previous section, HUD data reveals that Project-Based Section 8 programs in Thurston County have a disproportionately high number of Asian residents compared to the census tract's population.

c. Disparities in Access to Opportunity

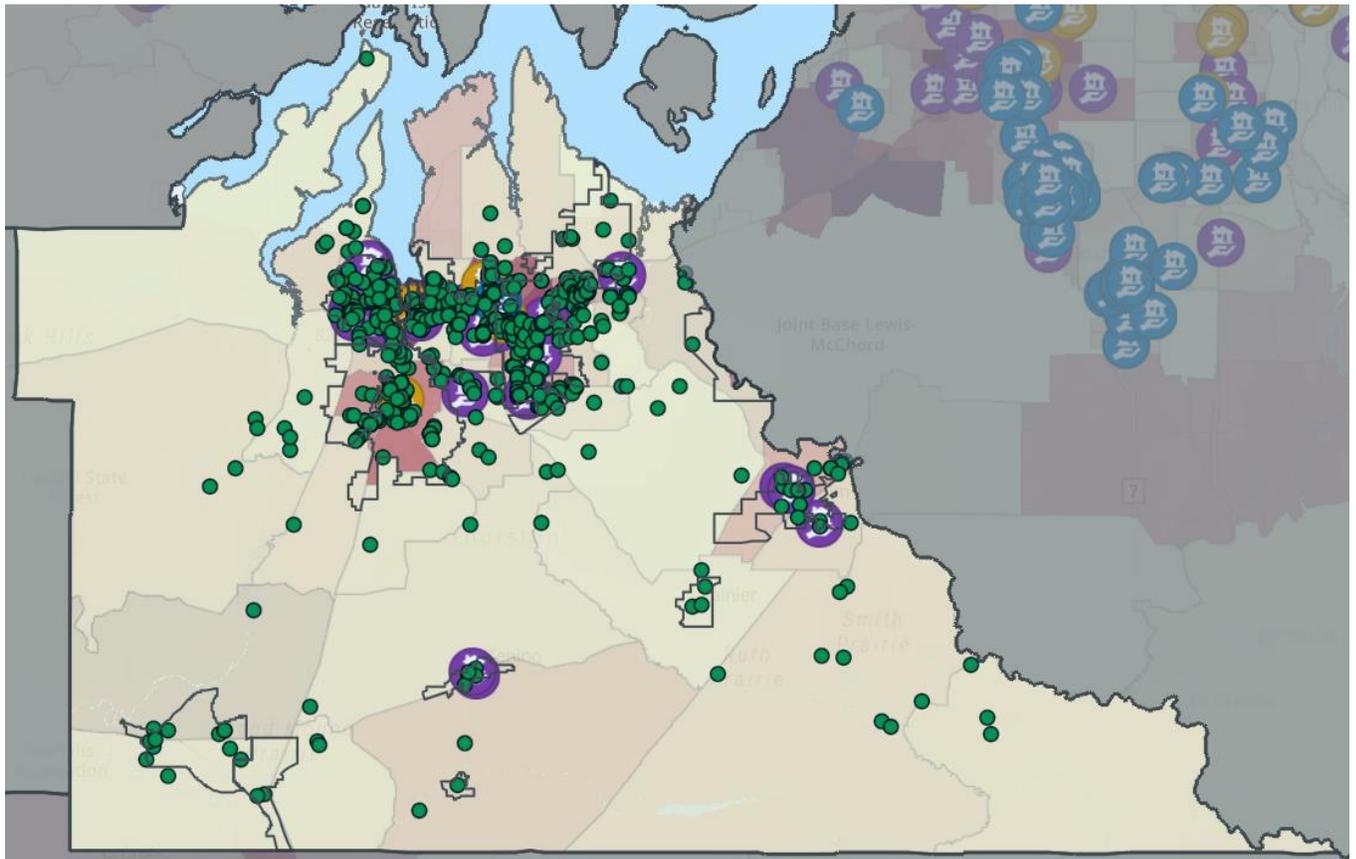
i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

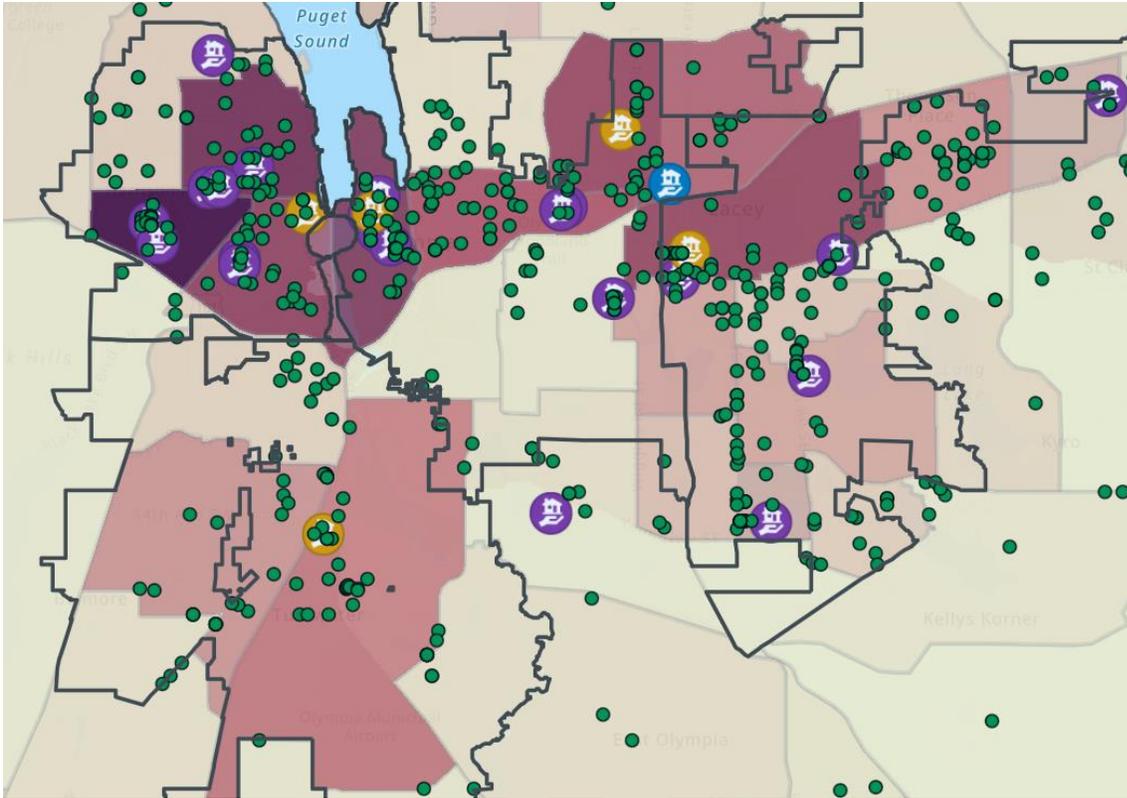
Generally, many of the publicly supported properties are located in the urban core, with relatively close proximity to job opportunities, good schools and transit access. The county has no HUD identified R/ECAPs and has low scores overall on the Dissimilarity Index (considered a low level of segregation).

When assessing future siting of affordable housing, it is apparent that some of the areas with lowest poverty, highest performing schools, and high labor market engagement also have limited or no public transportation and fewer essential services nearby (Boston Harbor, Black Lake, areas of unincorporated Thurston County south of Tumwater and Olympia).

There are some areas in the urban core with high opportunity that do not have subsidized properties and have very few voucher holders: Black Hills, the Wildwood area in Olympia, Tumwater along Cleveland Avenue to Pioneer Park, South of Yelm Highway around Rich Road, and along Boulevard Road in Olympia (near Washington Middle School).

The maps below show publicly supported housing and voucher holders, with shading that represents areas with higher poverty rates.





2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

HATC will sometimes prioritize households based on targeted funding, meaning they have vouchers that are dedicated to serve a very specific population. Types of targeted funding are: Non-elderly disabled, Family Unification vouchers which help to reunite families that have children leaving foster care and housing is the sole barrier to reunification, and VASH vouchers to serve homeless veterans by referral from the Veterans Administration.

Excluding those priorities, households that meet a residency preference (residing or working in Thurston County) will be served with priority given to the following households:

- Elderly or Disabled
- Near Elderly: 50 and over
- Families with minor or disabled adult children and single pregnant women
- Single individuals or couples who are victims of domestic violence or hate crimes
- Single individuals or couples who are victims of a declared natural disaster
- Families who are homeless

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility.

Housing Authority of Thurston County (HATC) operates a voluntary Family Self Sufficiency program to participants of the Housing Choice and Project Based Voucher Programs. Participants work with the FSS Coordinator to develop a financial plan that includes setting goals for budgeting, financial coaching, opportunities for education, employment training and job growth. The FSS Coordinator can also provide resources for childcare, transportation, financial planning, and credit repair.

An interest-bearing escrow savings account is set up for FSS participants. When a participant's earned income increases, funds are deposited into their account. The amount credited to the participant's escrow account is solely based on increases in the participant's earned income during the term of the FSS contract. The participant can withdraw this tax-free money after successfully completing the FSS program.

The majority of HATC program participants have Housing Choice Vouchers, which means that residents select housing units that best fit their needs (provided the unit passes inspection and meets payment standards). This allows for greater geographic mobility.

HATC routinely speaks at landlord association meetings regarding housing and rental assistance programs provided by the HATC. HATC works to build relationships with private market landlords and create partnerships to allow more HATC program participants to access housing options.

HATC owns 553 units of below market rental housing, through a combination of acquisition and development. Of those, 453 units have been acquired and renovated by HATC, and 100 units have been newly built by HATC. HATC has an additional 28 units under construction and has acquired land that will accommodate up to 50 more units. All HATC units are offered at rates well-below market rate, including a substantial number at less than \$800/month making them affordable to neighbors without vouchers. The majority of residents of HATC properties do not have vouchers. Given the high costs of construction, the acquisition of properties is a rent preservation strategy that enables HATC to offer monthly rents that are hundreds of dollars below market rates.

HATC has allocated its Project-Based Voucher capacity to non-profits serving special needs; no project-based vouchers are allocated to HATC properties. HATC describes this strategy as "Collaborative Housing." The strategy has fostered the development of 475 additional housing units for low income, highly vulnerable neighbors. HATC has 14 HCV Project-Based housing contracts owned and operated by local non-profit organizations. Local organizations include the Low-Income Housing Institute and Behavioral Health Resources (three projects each), Catholic Community Services of Southwest Washington and Mercy Housing (two projects each), Community Youth Services, Panza (Quixote Village), Homes First, and Family Support Center of South Sound (one project each). Project-Based housing contracts are outlined below.

- Fleetwood, Unity Commons, Drexel House, Quixote Village, and Billy Frank Jr. Place serve single-family member or adult couple households who are experiencing homelessness and referred by the Thurston County Coordinated Entry System. The six projects consist of a total of 225 units.

- Behavioral Health Resources' three properties serve persons with disabilities for a total of 57 units.
- Community Youth Services has one project that serves persons aging out of foster care and includes six units.
- Family Support Services of South Sound has one project that serves families with children who are homeless and includes seven units.
- Homes First with one project, and Mercy Housing, with two projects, serve low-income families for a total of 99 units.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

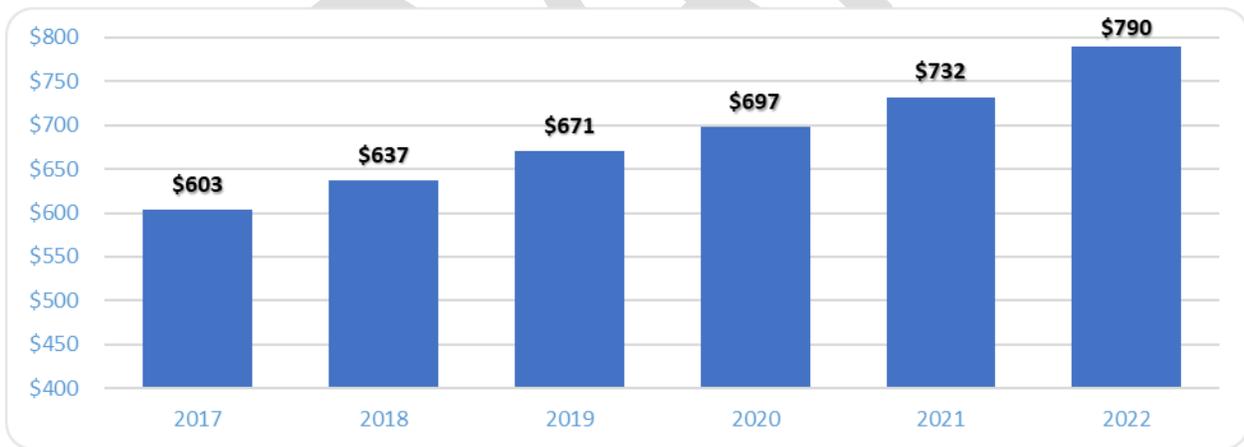
- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access
- Lack of local or regional cooperation
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Land use and zoning laws
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

Admissions and occupancy policies and procedures, including preferences in publicly supported housing - Recent awards of Housing Choice Voucher (HCV) funding have targeted homeless households only. Some of this new funding also limits eligibility to homeless, disabled, and under the age of 62 heads of households. Families who are rent-burdened and at risk for homelessness are not being served. Many rent-burdened families live in substandard housing, including doubling up with other families for economic reasons only.

A survey respondent who is experiencing housing instability stated: *'I personally was told I don't qualify for housing assistance unless I'm living in the streets with my toddler. Not only is it absolutely ridiculous that because I'm temporarily living with a friend I can be denied, but even more so that I would have to put my child in an unsafe situation to qualify. There needs to be an easier way for single parents to access assistance with housing and childcare, otherwise how are we supposed to survive?'*

Lack of access to opportunity due to high housing costs & Displacement of residents due to economic pressures - The Housing Authority of Thurston County assists approximately 1,800 households with rental assistance vouchers. HATC is limited by the number of rental assistance vouchers and funding. Due to increasing housing costs in Thurston County, HATC is constricted primarily by funding. HATC is currently spending about 103% of its annual budget provided by HUD, so cannot utilize all of its allotted vouchers. Many voucher participants have disabilities and fixed incomes that do not increase proportionate to the local rental market, so HATC must pay a higher subsidy to meet rising rental costs. The figure below shows rising per unit costs over time.

Housing Choice Voucher Per Unit Cost



Source: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard

HATC is also not typically able to assist households with deposits or move-in costs. As those costs increase, it can be difficult for voucher participants to locate units that meet payment standards, as well as pay the required move-in costs. If a household's rent increases beyond payment standards, the household must pay the difference.

As rents sharply increased after the eviction moratorium ended in October 2021, many households were faced with sudden, large rent increases. According to a Fall 2022 report released by the Washington Center for Real Estate research, the average rent in Thurston County was \$1,525 (\$1,387 for a 1-

bedroom unit and \$1,663 for a 2-bedroom unit). In the past five years, average rents have increased approximately 47%. From 2021 to 2022, average rents increased about 31%.

Of 80 survey respondents who indicated they have a subsidy or voucher that helps to pay their rent, 53 respondents stated their rent had increased in the past 12 months. On average, the rent increased between \$100 and \$199 per month. Five respondents reported that their rent increased by \$500 or more per month, while their income decreased or stayed about the same. Twenty-five survey respondents with a voucher are worried they are at risk of eviction in the next 6 months. Of those, 22 reported that increased rents and cost of housing are the primary reason they worry they could be at risk of eviction. Thirty-four respondents reported they had considered moving out of the city or county where they live because housing is too expensive.

Rent increases are not tied to unit improvements, and many older units that have not been updated or repaired still have rising rents to keep pace with the rental market.

Payment standards were increased in October 2022 to the following amounts:

Studio - \$1,239

1-Bdrm - \$1,369

2-Bdrm - \$1,601

3-Bdrm - \$2,275

4-Bdrm - \$2,728

5-Bdrm - \$3,137

Many more households are eligible than receive assistance. HATC operates a waiting list, which was last opened in January 2020. Prior to that date, the waiting list was last opened in 2015. Currently there are 1,252 households on the waiting list. There are an estimated 25,003 households in Thurston County that earn below 50% of Area Median Income, who may be eligible for housing assistance if there was sufficient capacity to meet the need.

One survey respondent states: *'It is currently basically impossible to get a section 8 voucher. This makes it also basically impossible for someone on SSI to get a place to live.'*

HATC currently has 2,070 Housing Choice Vouchers. About 88% of those vouchers (1,815) are issued and leased (at the time of this report writing). HATC has 475 project-based vouchers, 105 VASH (Veteran's Affairs Supportive Housing) vouchers, 425 Non-Elderly Disabled (NED) vouchers, 68 Family Unification Program vouchers, and 140 Mainstream (Homeless, Non-Elderly Disabled) vouchers. Sixty-eight (68) Emergency Housing Choice Vouchers were provided by the federal government in 2022 to HATC. Of those 68 vouchers, 57 have been issued and leased (as of early December 2022). Even with additional funding to pay for arrears, application fees or extra deposits, HATC staff and participants search for units every day and fill out many applications. Project based vouchers have a nearly 96% utilization rate (meaning vouchers are currently leased). Project based vouchers make up just over 21% of HATC's total Housing Choice Voucher program.

Land Use and Zoning Laws – According to HATC staff, voucher participants struggle to qualify for single-family homes or manufactured homes due to HCV program requirements that participants cannot pay more than 40% of their adjusted income towards rent and utilities. The HUD-set Fair Market Rents, which are utilized to set payment standards, has not kept pace with the increasing rents in Thurston County. Even marginal single-family homes and manufactured homes are outside the HATC payment standards. HATC has set its payment standards to the maximum allowed by HCV regulations. Multifamily housing integrated into neighborhoods that have traditionally been zoned for single-family homes will decrease segregation and increase access to opportunities for voucher participants, who are more diverse than the general population.

Communities have traditionally had many requirements for multifamily housing including amenities such as onsite parking, fire access, buildings that “match” the character of the neighborhood and traffic impact studies, etc. All these requirements of multifamily housing projects increase the initial cost and result in housing that expensive to build and maintain. Much progress has been made in recent years by local jurisdictions, including:

- More flexibility for duplexes, triplexes, fourplexes, sixplexes and courtyard apartments in residential zones;
- Allow accessory dwelling units (ADU’s) in all residential zones
- Free, pre-approved ADU building plans;
- Increased max size and height, relaxed sprinkler rules and no longer require additional parking space or for the owner to live onsite;
- Allow group homes in all residential zones and commercial zones that allow residential units;
- Density and height bonuses for affordable housing;
- Impact fee waivers for affordable housing;
- Reduced parking requirements for affordable housing located near transit lines.

However, the legacy of preference toward single family zoning has lasting impacts, and there are still considerable requirements to develop multifamily housing, which add to project costs.

Community Opposition - When land use and zoning is reviewed, with an eye to adding high-density, multifamily, and affordable housing, there is resistance from the public due to negative perceptions about multifamily housing (which could be considered a “Not in My Backyard” or NIMBY attitude). Some communities have a strong anti-growth sentiment among the constituency or just don’t want any high-density housing development due to concerns of changing the character of the community, or fears about the people this kind of development will bring. Consequently, multifamily-zoned land may be very limited, may be located at the edge of a community, or maybe in less desirable areas, where it is difficult to attract investors.

More public relations and advocacy will need to occur in these communities to demonstrate the benefits of a range of housing choices for all residents in each community, particularly people with disabilities, elders, and diverse ethnic backgrounds.

Source of Income & Private Discrimination - Source of income was the most reported reason for housing discrimination among community survey respondents. Of the 229 survey respondents who indicated they or someone they knew had experienced housing discrimination in Thurston County, 155 reported the discrimination occurred due to source of income. Under the Washington State Residential

Landlord-Tenant Act's source of income protections, landlords are directed to review the tenant's income as a percentage of the tenant's portion of rent (not the monthly rent amount) when considering a tenant application. Most rental properties require an income to rent ratio of 3:1.

Barriers are compounded when a voucher program participant is a member of other protected classes. Fifty of 80 survey respondents who were voucher participants indicated that they or someone they know has experienced housing discrimination in Thurston County. The most reported basis of discrimination was source of income (41 respondents). Additionally, 33 respondents indicated the discrimination was based on disability, 17 indicated it was based on race, 14 indicated it was based on family status, and 13 reported it was based on gender. The most common form of discrimination was that a landlord refused to rent or deal with them.

One survey respondent noted: *'Our townhouse was built in the 60s or 70s. The place smelled like mold when we moved but they were the only ones willing to accept our voucher and our companion animals.'*

Another respondent stated: *'Anyone on disability and veterans, most do not get a lot. I don't. Less than 900/mo. If I didn't have a voucher I would be homeless still. Even if someone could find a place to pay rent with their whole income, they wouldn't be able to live and meet their needs.'*

Another respondent relayed a situation where she was homeless prior to receiving a voucher and moved into an affordable housing site where she believes she experienced different treatment due to her race and status as a domestic violence survivor. She became homeless again for over two years after being evicted, and struggled to re-gain housing, due to the eviction and judgment impacting her credit history.

Screening policies and criteria – While source of income discrimination is illegal, other forms of screening criteria often create barriers for voucher holders to access housing, even with rent subsidies offering a guaranteed form of payment. According to HATC staff, primary reasons for rejection include: lack of rental history, lack of credit, debt to income ratios, and evictions. Even if a judgement associated with an eviction has been paid by the tenant, applicants with vouchers are still being rejected by property owners.

One survey respondent suggested: *'More landlords should accept vouchers. Vouchers should exempt credit checks and meeting 2-3 times the rent requirements. Vouchers should be open to reasonable cost in the area and not a set amount.'*

Of the 80 survey respondents who have a voucher or subsidy to help pay their rent, 38 reported that their goal in the next 6 months was to move to a better housing unit or neighborhood. Forty-two reported that their goal was to stay in their current unit. Thirteen respondents hope to buy a home in the next 6 months.

The following are the primary barriers identified by voucher holders to meet their housing goals in the next 6 months:

- Cost of housing (61 respondents)
- Accessibility of units available (39)
- Voucher standards (35)
- Lack of available units for my needs/family size (30)

- Application or screening barriers (29)
 - income too low (31)
 - debt to income ratio (21)
 - credit history (19)
 - type of income (17)

Additionally, 6 respondents indicated that language or disability-related barriers kept them from meeting their housing goals.

Survey respondents who have a voucher prioritized these five strategies to increase equity and address housing disparities for members of protected classes in Thurston County:

- More affordable housing and/or financial assistance for housing for low-income individuals and families – 89% of respondents
- Increasing access to homeownership – 53%
- Housing in a variety of types and sizes to meet various family sizes and needs – 48%
- Reducing barriers to accessing housing (criminal history, credit history, etc) – 48%
- Better enforcement of source of income protections – 44%

D. Disability and Access Analysis

1. Population Profile

a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

An estimated 37,903 individuals in Thurston County (about 14% of the total population) and 7,385 individuals in Olympia have one or more disabilities. Of these disabled individuals, nearly 16% had incomes that were below the federal poverty level, nearly 7% higher than individuals without a disability⁷⁰.

The chart below shows percentage of the population that has a disability by jurisdiction⁷¹:

Bucoda	Lacey	Olympia	Rainier	Tenino	Tumwater	Yelm	THURSTON COUNTY	Chehalis Reservation	Nisqually Reservation
19.5%	15.2%	14.6%	22.2%	17.0%	10.9%	13.9%	13.7%	16.2%	16.4%

Source: TRPC using 2016-2020 American Community Survey 5-year Estimates, Table B18101

Rainier and Bucoda have the highest proportion of individuals with disabilities, while Tumwater has the lowest proportion of individuals with disabilities.

⁷⁰

https://data.census.gov/cedsci/table?t=Official%20Poverty%20Measure&g=0500000US53067_1600000US535130_0&tid=ACSS5Y2020.S1703 Table S1703

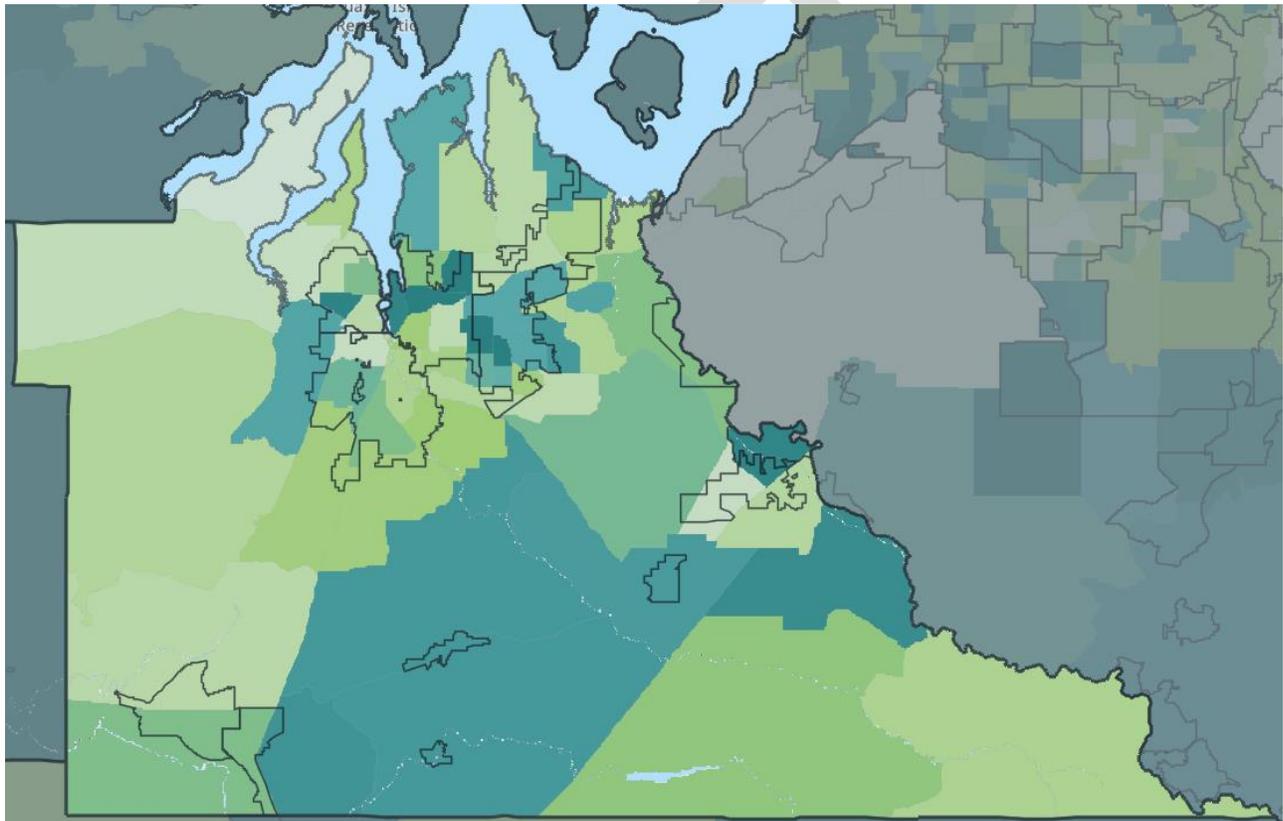
⁷¹ <https://www.trpc.org/451/Disability-Status>

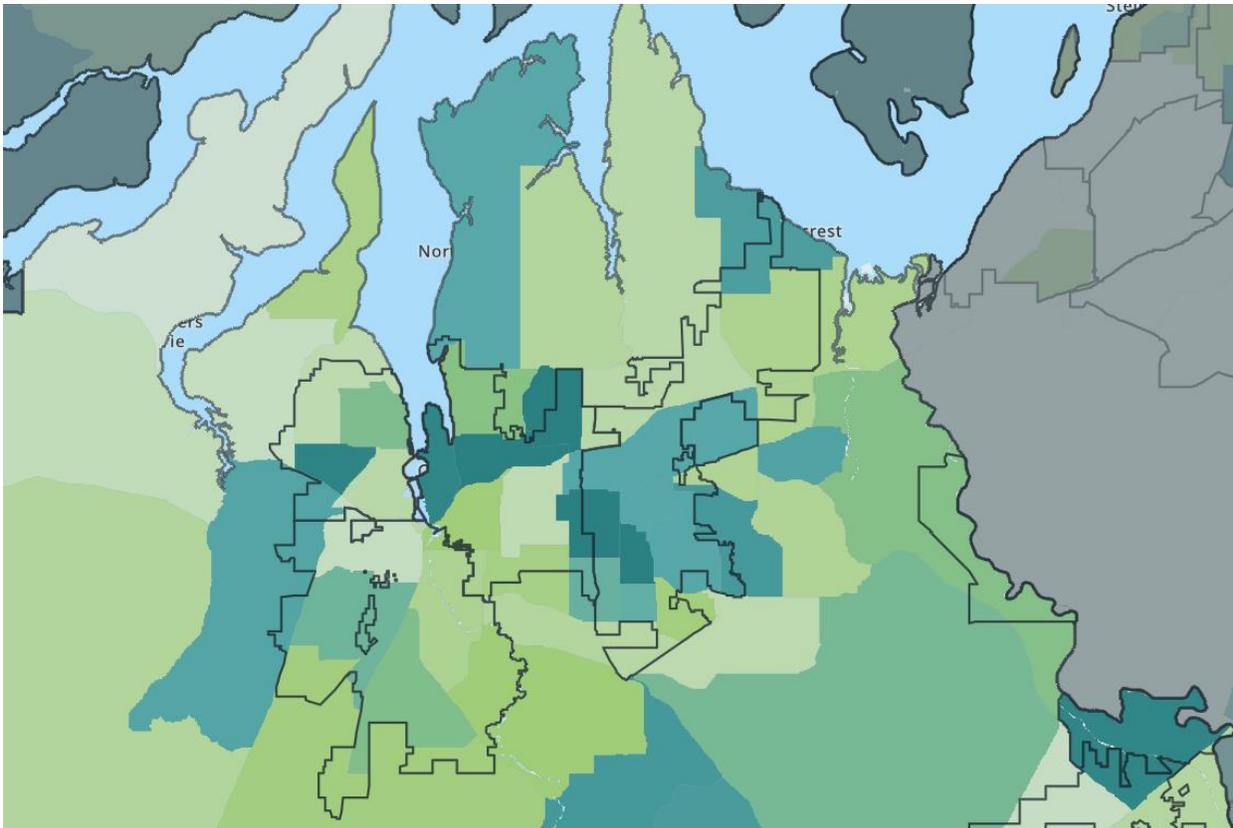
The maps below show percent of the population with a disability by census tract. Darker shading represents more people with disabilities reside in the census tract. Nationally, about 13% of the population reports having one or more disabilities.

While higher proportions of the overall population in Rainier and Bucoda have one or more disabilities, the maps below show that there are census tracts that contain higher concentrations of people with disabilities in the urban core of Olympia and Lacey.

The highest proportion of the population with disabilities (33% report having one or more disabilities) is located in northeast Olympia, while the lowest is located in Steamboat Island (about 6% of the population).

Percentage of Population with one or more disabilities





In the urban areas of the County, the highest proportion of residents who report having disabilities are in east Olympia, north of I-5 and clustered around State Avenue and 4th Avenue. About 33% of individuals residing in northeast Olympia (around Providence St. Peter’s Hospital) report having one or more disabilities. In this tract, there are several assisted living, long-term care facilities, a memory care facility, and a subsidized apartment building for adults age 62 and older. This area also has a higher concentration of individuals born outside the U.S.

In west Olympia (around Yauger Park and Capitol Mall), nearly 19% of individuals have one or more disabilities. In this area, there are high rates of poverty and housing cost burden.

In Lacey, there are two adjoining census tracts (around Chambers Lake and Komachin Middle School) where 23% and 21% of individuals report having one or more disabilities. In the tract around Chambers Lake, there is a long-term care facility and Panorama City (a senior housing community). The tract around Komachin Middle School has the highest proportion of Black or African American individuals, but lower rates of poverty in comparison to other neighboring tracts.

In the South County, the highest proportion of individuals with disabilities reside in North Yelm and the Smith Prairie area (south of Yelm and east of Rainier). Between 18-19% of the population in these areas identify as having a disability. The lowest prevalence of people with reported disabilities in the South County are located in the western part of Yelm (southwest of Highway 510). About 7% of the population in this tract reports having a disability.

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

Disability is categorized and reported by the U.S. Census as the following disability types: hearing, vision, cognition, ambulatory, self-care, independent living. This is by no means an inclusive or expansive list, but is the dataset provided by HUD for countywide analysis.

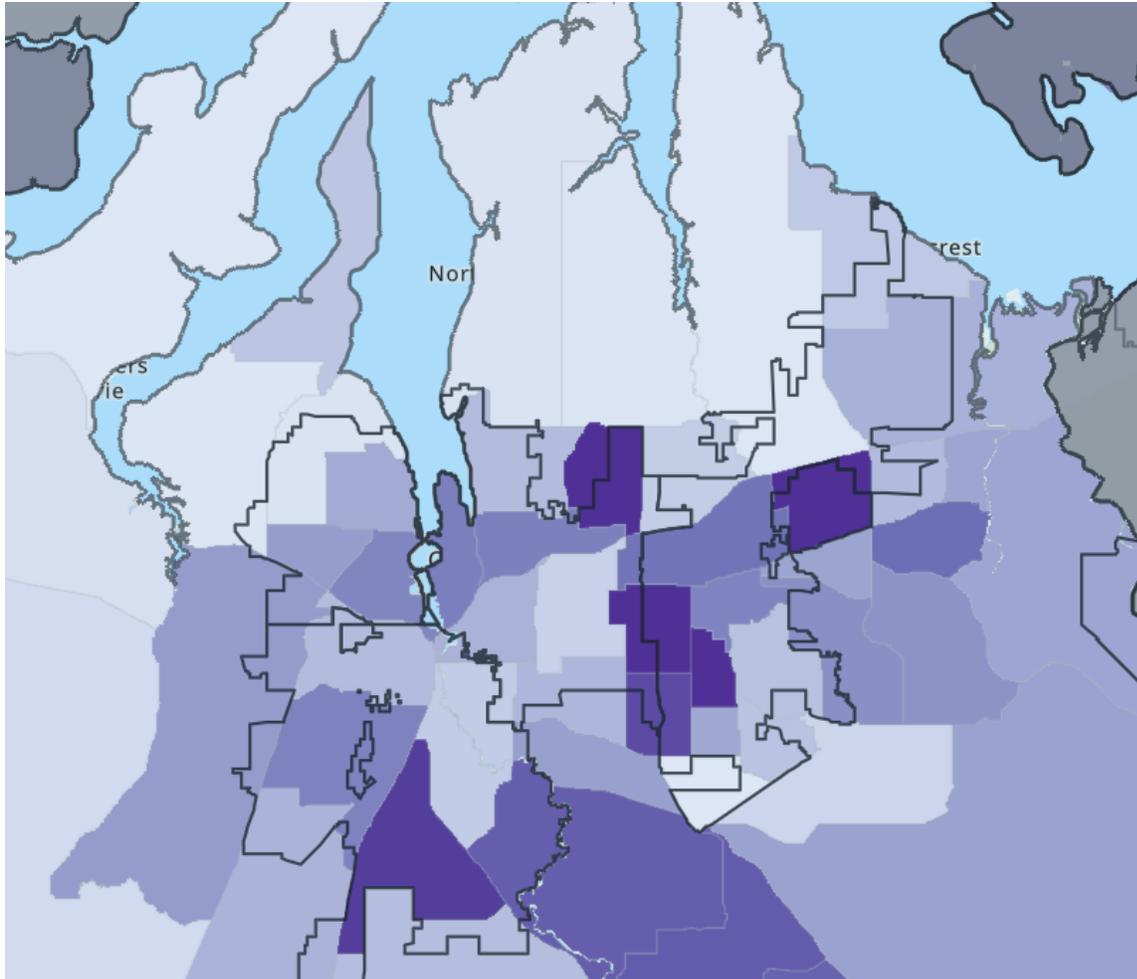
The table below shows the six disability types by age group⁷². About 7% of all Thurston County residents have difficulty with mobility, but that number rises to 20% for residents over age 65. Nearly 4% of children in Thurston County have cognitive difficulty. About 12.5% of Thurston County residents over age 65 have difficulty hearing.

DISABILITY TYPE BY DETAILED AGE	Thurston County		Olympia	
	2020 With a disability	2020 Percent with a disability	2020 With a disability	2020 Percent with a disability
With a hearing difficulty	11,684	4.2%	1,857	3.6%
Under 18 years	405	0.7%	61	0.6%
18 to 64 years	4,440	2.6%	637	2.0%
65 years and over	6,839	14.1%	1,159	12.5%
With a vision difficulty	6,560	2.4%	1,240	2.4%
Under 18 years	530	0.9%	62	0.7%
18 to 64 years	2,993	1.8%	684	2.1%
65 years and over	3,037	6.3%	494	5.3%
With a cognitive difficulty	13,540	5.2%	3,069	6.4%
Under 18 years	1,748	3.9%	206	3.3%
18 to 64 years	8,056	4.8%	2,210	6.9%
65 years and over	3,736	7.7%	653	7.0%
With an ambulatory difficulty	18,383	7.0%	3,437	7.2%
Under 18 years	254	0.6%	0	0.0%
18 to 64 years	8,874	5.3%	1,573	4.9%
65 years and over	9,255	19.1%	1,864	20.1%
With a self-care difficulty	6,457	2.5%	1,399	2.9%
Under 18 years	404	0.9%	75	1.2%
18 to 64 years	2,731	1.6%	579	1.8%
65 years and over	3,322	6.9%	745	8.0%
With an independent living difficulty	11,948	5.5%	2,396	5.8%
18 to 64 years	6,454	3.8%	1,297	4.0%
65 years and over	5,494	11.3%	1,099	11.9%

⁷² https://data.census.gov/cedsci/table?q=S1810&g=0500000US53067_1600000US5351300&d=ACS%205-Year%20Estimates%20Subject%20Tables&tid=ACST5Y2020.S1810

Source: ACS 2016-2020 5-year estimates

The map below shows percentage of individuals over age 65 who have one or more disabilities. Nationally, on average, about 34% of people age 65 or older have disabilities.

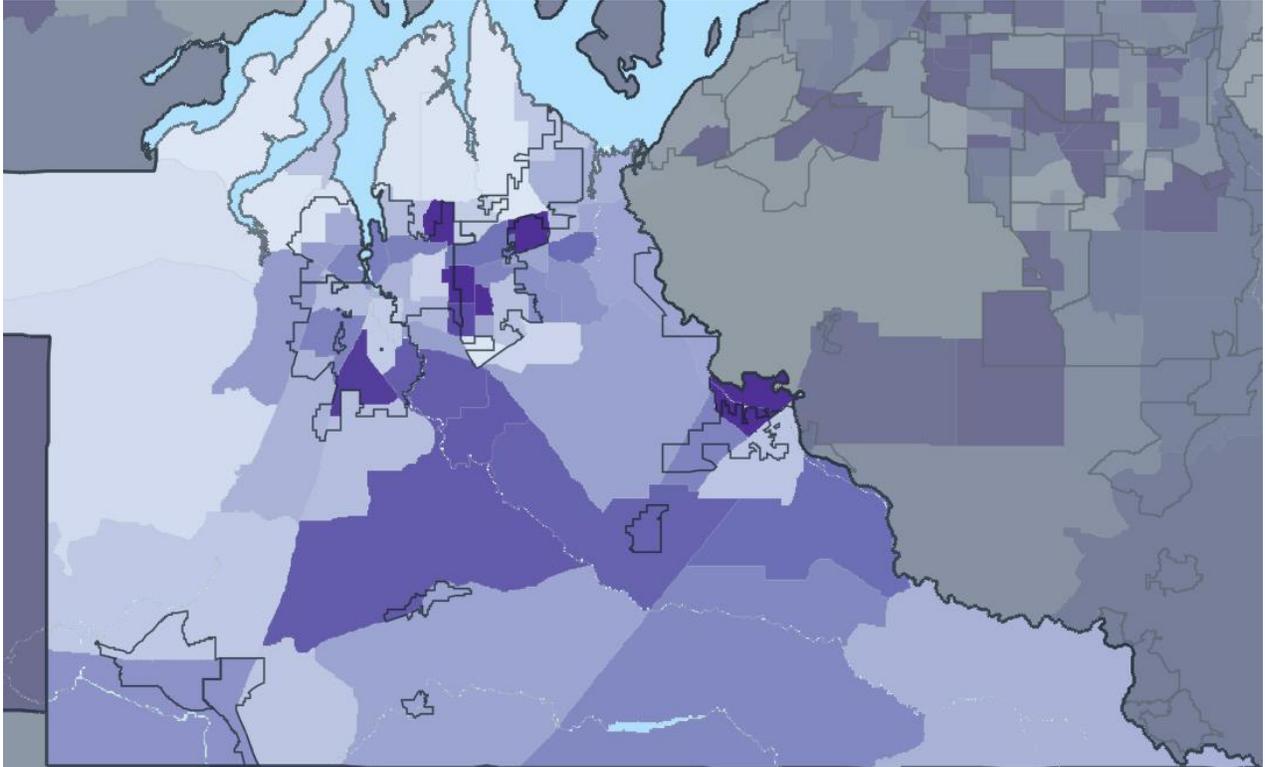


The map above largely aligns with the earlier map of the overall population of people with disabilities. The tracts around St. Peter's Hospital and Panorama City continue to show a high concentration of people with disabilities who are over age 65. However, there are a few differences of note.

Some tracts appear to have more elders with disabilities (in comparison to the map of people with disabilities of all ages in the previous section): Tanglewilde, Thompson Place, and the area around the Olympia airport in Tumwater. These areas have higher populations of people of color and relatively high rates of poverty.

The following tracts highlighted in the previous section appear to have more people with disabilities who are under age 65 (lighter shading on this map in comparison to the map in the previous section): west Olympia by Yauger Park, downtown Olympia, and east Olympia north of I-5.

In north Yelm, it appears that the majority of individuals with one or more disabilities in this tract are elders. In the Smith Prairie area (south of Yelm and east of Rainier), it appears that there are higher rates of individuals under age 65 with a disability.



2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Of the 613 respondents to the Assessment of Fair Housing survey, 57% of respondents live in a housing unit that is 30 years old or older. The Fair Housing Act requires that most multifamily residential properties built after 1991 meet federal accessibility standards. Since the majority of survey respondents reside in housing units built before 1991 and half of survey respondents live in single family homes, it is unlikely those units are accessible.

Of the total 613 respondents to the Assessment of Fair Housing survey, 328 respondents indicated that they or a family member in their household has a disability, neurodivergence, mental illness or chronic illness. Nearly 24% of respondents with a disability identified accessibility of housing units as a barrier to meeting their housing goals.

The 328 respondents who identified as a person with a disability or as having a disabled family member were asked about accessibility needs in their housing and 225 people responded. The greatest accessibility needs are:

- 56% require specific property criteria, such as few or no stairs, wider doorways, ground floor units

- 52% require accommodations or changes to policies, such as a reserved parking spot near their unit, waiver of a no pet policy or pet deposit to allow a service animal
- 32% need minor modifications to the property (grab bars, smoke detectors with visual alarm)
- 19% need structural elements to the larger building or neighborhood, such as curb cuts
- 16% need accommodations in communications with a property manager (written vs. verbal communication, interpreters, etc)
- 11% need significant modifications to their housing unit, such as lowered countertops and wheelchair ramps
- 21% indicated some other accessibility need
 - 7 respondents indicated a need for clean air, mold remediation and scent free environments due to respiratory, chemical sensitivity, sensory sensitivity or other needs.
 - Suggested need for hygiene inspections and mold remediation in units
 - Suggested greater distance from units for smoking areas, and use of grills (sensitivity to kerosene used)
 - Several respondents indicated a need for assistance in reading, understanding and filling out documents
 - Several respondents expressed concerns around PTSD and anxiety triggers, such as inspection of unit for no apparent reason, stress due to living in confined space with many people but having limited options beyond apartment complexes due to voucher limitations
 - Other responses include close parking, live-in caregiver, room for wheelchair to maneuver inside unit, wheelchair ramps to all exterior doors, allow emotional support animals, sound control from neighbors' apartments.
 - Multiple respondents indicated difficulty finding and affording housing due to limited income and income or credit requirements to access housing.

318 respondents answered additional questions about their access needs or experiences related to their disability in the community.

- 25% indicated they have difficulty accessing transportation near where they live
- 24% indicated they have difficulty navigating their neighborhood due to lack of sidewalks, curb cuts, crosswalks or pedestrian lighting
- 21% indicated they have been discouraged from renting a unit or steered toward a particular unit or area of an apartment complex
- 16% have been asked invasive questions about their disability by a landlord or housing provider
- 13% have been denied their request for a reasonable accommodation or modification
- 10% experienced having a housing application denied for a disability-related reason
- 9% have difficulty finding schools or childcare in their neighborhood that meets their child's disability-related needs
- 43% indicated they had not experienced any of the challenges listed

Survey respondents were asked about health impacts of housing concerns such as mold or other conditions. A sample of disability-related concerns expressed by survey participants are included here:

- *'A previous house I rented had fragrance permanently soaked into the floorboards (from over-zealous use of a very fragranced soap on a stain). I have MCS and fragrance will make me sick (brain fog, migraines, cold symptoms). I had to avoid that room for the 9 years we lived there, and still was sick for a cumulative 30-40 days as a result. I have a suspicion it also made my MCS much worse, to the point I have limited job options because I need a fragrance-free workplace.'*
- *'Mold gave me lung infections. Lack of accessible bathroom has caused falls and multiple injuries because I can't access my powerchair.'*
- *'When I first moved in since it was a new unit it hadn't been properly offgassed and I had breathing issues for 5-6 months while the apartment settled.'*

All survey respondents were asked about their top five priorities to increase equity and address housing disparities for members of protected classes in Thurston County. A total of 605 respondents provided their priorities.

- 75 (12%) selected repairs or improvements to housing to increase accessibility for people with disabilities
- 95 (16%) selected better access to in-home care or other supports for people with disabilities

One respondent stated, *'I am doing this survey on my brothers behalf due to his inability to access proper housing for a quadriplegic wanting to live independently as long as possible. The need for roll in showers, lower countertop and cooking safely. He has a hard enough time trying to get reliable caregivers and has lived at the same residence 30 years, never complains but doesn't want to create an issue because there are not enough apartments to meet his needs. Just feel that with new building codes and the amount of new apartments being built there should be several units built for persons with severe disabilities so choices can be made to move if necessary. Thank you for your time.'*

b. Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Most multifamily housing (properties with 4 or more housing units) built after 1991 must meet Fair Housing Act design and construction requirements. Federally funded programs must comply with Section 504 of the Rehabilitation Act of 1973, which has additional accessibility requirements. Housing projects that receive state or local government funding must also comply with accessibility requirements in Title II of the Americans with Disabilities Act.

A review of the map of publicly supported provides some indication of the location of affordable and accessible housing units. Most publicly supported housing units are scattered through the urban core of Olympia, Lacey and Tumwater, with additional properties in Tenino and Yelm.

In Thurston County, 51.1% percent of the housing stock was built before 1990. In Olympia, 61.8% of housing units were built before 1990.⁷³

⁷³ ACS 2016-2020 5-year estimates (DP04)

The majority of multifamily units (which are more likely to be accessible, depending on age of the units) are in the urban core. In Thurston County, there are 15,794 housing units located in properties with 5 or more units. In Olympia, there are 7,669 housing units located in properties with 5 or more units. In Rainier and Bucoda, there are no properties with 5 or more housing units.

Units in Structure	Thurston	Bucoda	Lacey	Olympia	Rainier	Tenino	Tumwater	Yelm
5 to 9 units	3.6%	0.0%	3.0%	7.3%	0.0%	2.1%	9.8%	6.3%
10 to 19 units	3.7%	0.0%	5.0%	7.3%	0.0%	17.1%	5.5%	2.9%
20 or more units	6.1%	0.0%	8.8%	17.0%	0.0%	0.0%	4.5%	7.7%
TOTAL % 5+ unit properties	13.4%	0%	16.8%	31.6%	0%	19.2%	19.8%	16.9%

Source: 2016-2020 ACS 5-Year Estimates (DP04)

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

There is higher proportion of residents with disabilities in publicly supported housing than in the general population. Project-based Section 8 housing in Thurston County receives targeted funding to serve people with disabilities. HUD data indicates that 71% of households in public housing, 21% of households in Project-Based Section 8 housing, and 41% of households in the Housing Choice Voucher program have at least one household member with a disability. About 14% of Olympia and countywide residents have a disability. In publicly supported housing in Olympia, there are slightly higher rates of persons with disabilities. Twenty four percent of households in Project-Based Section 8 housing in Olympia and 44% of households in the Housing Choice Voucher program in Olympia have a disability.

A local Veteran’s Affairs staff who helps veterans using a HUD VASH voucher locate housing and provide clinical case management indicated that it is very difficult to find both affordable and accessible units. Many of the senior housing units with greater accessibility or newer multifamily units are out of the payment standards for voucher participants. It is very difficult to find ground floor units with no stairs. Additional features such as walk-in showers and grab bars are also needed. Many VASH participants also experience barriers due to their criminal history.

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

As shown in the maps in previous sections, people with disabilities reside throughout Thurston County. Some individuals with disabilities may need different types of supportive services for their daily living needs. Many supportive residential options are clustered in the urban core of Olympia, Lacey and Tumwater, with some additional units in Yelm.

Housing Authority of Thurston County has 67 units of scattered site permanent supportive housing options for people with disabilities, through partnerships with community-based housing organizations

and supportive services. Homes First has 33 housing units (mostly single-family homes, duplexes, or other smaller properties) set aside for families with developmental disabilities, through referral by the Washington State Department of Developmental Disabilities. There are also 30 units for individuals with chronic mental health diagnoses. Most properties are located in Olympia, Lacey or Tumwater, however, 4 units are located in Yelm.

Special Needs/Non-Homeless Permanent Supportive Housing, Thurston County

Development Name	Type	Restriction/ Capacity	Total Units
Homes First	HOME/PBV	Dev. Disabled	4
Homes First & Kokua	PBV	Dev. Disabled	12
Homes First & Place One	PBV	Dev. Disabled	13
Homes First & Comm. Resources	PBV	Dev. Disabled	4
Tumwater Cove	PBV	CMI	8
Mansfield apartments	HATC	CMI	7
BHR - B&B	PBV	CMI	15
Yelm Community Services	PBV		4
TOTAL			67

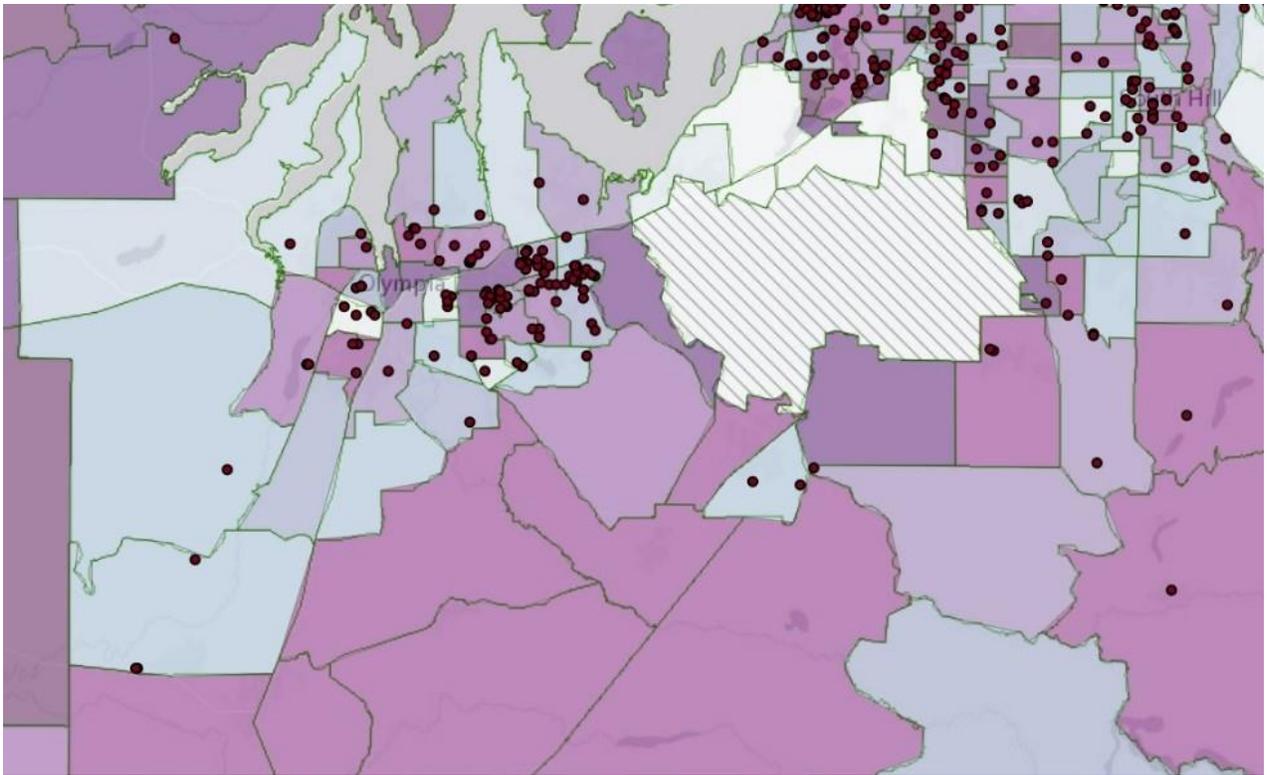
Source: Thurston County Consolidated Plan Needs Assessment

According to the Arc of Washington (an advocacy organization for people with developmental disabilities), about 80% of individuals with developmental disabilities (DD) live with their families. As family caregivers age, many adults with DD may become institutionalized to get the care and housing support they need.

Maps in the section below show care facilities throughout the county. While many assisted living, nursing homes, and adult family homes are targeted at caring for older adults, some adults with disabilities also reside in these settings. These maps were created by the Washington State Department of Health.

The map below shows the location of **Adult Family Homes (AFHs)** in Thurston County. AFHs are mostly clustered around the urban core, however, there are 1-2 homes in Yelm and Rochester. There are a total of 169 AFHs in Thurston County, with the greatest number in Olympia (88) and Lacey (65)⁷⁴.

⁷⁴ <https://fortress.wa.gov/dshs/adsaapps/lookup/AFHPubLookup.aspx>



Source: Washington State Department of Health⁷⁵

⁷⁵ <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>

The map below shows **Assisted Living Facilities**. Most are clustered in the urban core (5 in Lacey, 7 in Olympia, 2 in Tumwater). However, there are two facilities in Yelm. There are a total of 1,301 beds in assisted living facilities throughout the county.⁷⁶



Source: Washington State Department of Health⁷⁷

Assisted Living Facilities, Thurston County

Facility	Location	City
Bonaventure of Lacey	4528 Intelco Loop SE	Lacey
Memory Care at The Lodges	1530 Carpenter Rd SE	Lacey
Panorama City	1751 Circle Ln SE	Lacey
The Cottages at Lacey	8570 Martin Way E	Lacey
Woodland Retirement & Assisted Living Community	4532 Intelco Loop SE	Lacey
Artesian Place	828 McPhee Rd SW	Olympia
Brookdale Olympia East	616 Lilly Rd NE	Olympia

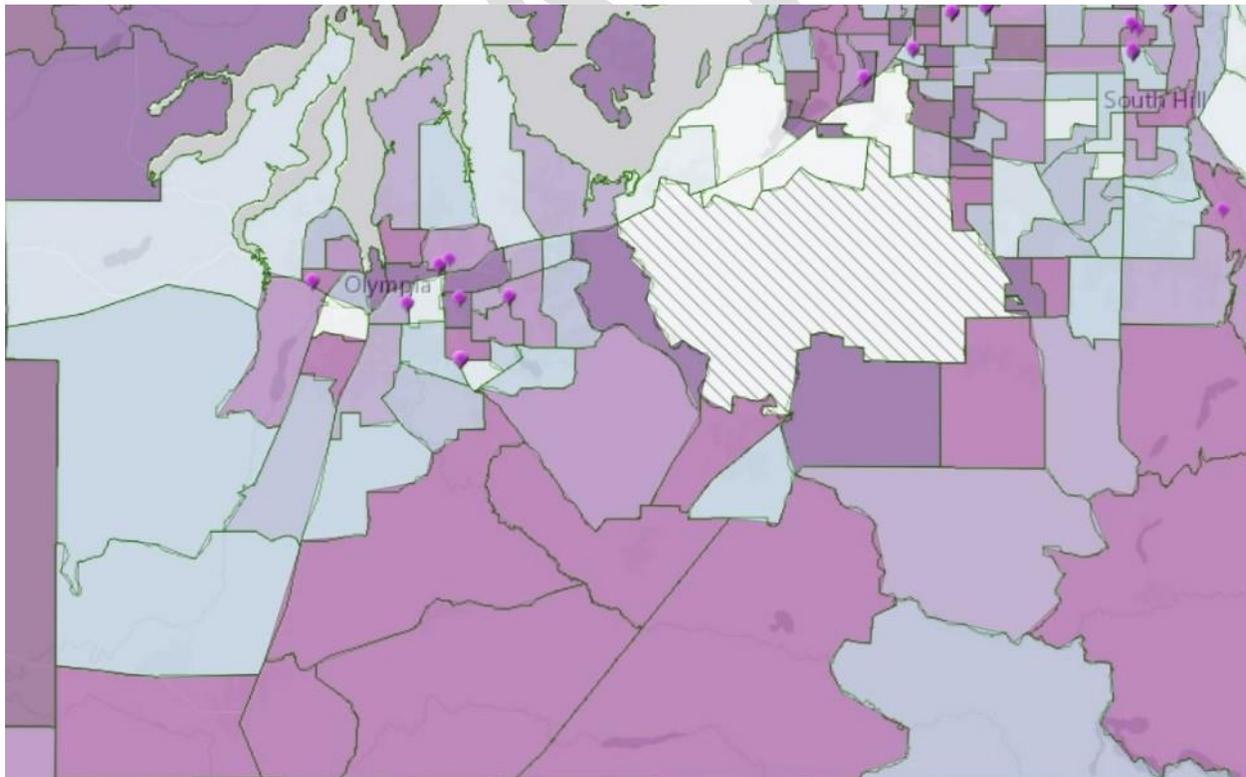
⁷⁶ <https://fortress.wa.gov/dshs/adsaapps/lookup/BHPubLookup.aspx>

⁷⁷ <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>

Facility	Location	City
Brookdale Olympia West	420 Yauger Way SW	Olympia
Fieldstone Cooper Point	810 Fieldstone Dr SW	Olympia
Fieldstone Memory Care of Olympia	710 Fieldstone Dr SW	Olympia
Garden Courte Alzheimer Community	626 Lilly Rd NE	Olympia
Sequoia Village	825 Lilly Rd NE	Olympia
Hampton Special Care - Tumwater	1400 Trosper Rd SW	Tumwater
Olympics West Retirement Inn	929 Trosper Rd SW	Tumwater
Easthaven Villa	311 Cullens St NW	Yelm
Prestige Senior Living Rosemont	215 Killion Rd NW	Yelm

Source: <https://fortress.wa.gov/dshs/adsaapps/lookup/BHPubLookup.aspx>

The map below shows all **nursing homes** in Thurston County. All are in Olympia or Lacey. There are 794 beds in eight Thurston County nursing homes.⁷⁸



⁷⁸ <https://fortress.wa.gov/dshs/adsaapps/lookup/NHPubLookup.aspx>

Nursing Homes, Thurston County

Nursing Home	Address	City
A Beacon of Care Adult Family Home LLC	5013 45th Ave Se	Lacey
Panorama City Convalescent & Rehab Center	1600 Sleater Kinney Rd SE	Lacey
ProMedica Skilled Nursing and Rehabilitation (Lacey)	4524 Intelco Loop SE	Lacey
Roo Lan Health & Rehab	1505 SE Carpenter Road	Lacey
Olympia Transitional Care and Rehabilitation	430 Lilly Rd NE	Olympia
Providence Mother Joseph Care Center	3333 Ensign Road NE	Olympia
Puget Sound Healthcare Center	4001 Capital Mall Dr SW	Olympia
Regency Olympia Rehabilitation and Nursing Center	1811 22nd Ave SE	Olympia

Source: <https://fortress.wa.gov/dshs/adsaapps/lookup/NHPubLookup.aspx>

Other institutional settings, include inpatient centers, are primarily located in Olympia and Lacey, however there is one Telecare location in Tumwater.

Mental Health In-Patient Service, Thurston County

Name	City
South Sound Behavioral Hospital	Lacey
Bethel Hills Integrated Healthcare	Olympia
Supreme Living LLC	Olympia
Telecare - Thurston Mason E and T	Olympia
Telecare Olympia Next Steps	Olympia
Telecare - Thurston Mason Crisis Triage	Tumwater

Source: <https://fortress.wa.gov/doh/facilitysearch/>

Residential Treatment Facilities, Thurston County

Name	City
Royal Life Center	Lacey
Royal Life Centers LLC	Lacey
The Haven Detox Center LLC	Lacey
Harvest House	Olympia

Name	City
RI International - CRC	Olympia
Supreme Living LLC	Olympia
Telecare Olympia Next Steps	Olympia
Telecare Thurston Mason Crisis Stabilization and Treatment Unit (STU)	Olympia
Telecare Thurston Mason E and T	Olympia
Thurston County Evaluations and Treatment Center	Olympia
Thurston County Triage and Crisis Stabilization	Olympia
Telecare Thurston Mason Crisis Triage	Tumwater

Source: <https://fortress.wa.gov/doh/facilitysearch/>

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

The range of affordable housing options for people with disabilities is limited based on the lack of availability of affordable housing units in general in Thurston County. Individuals who rely on Supplemental Security Income (SSI) for their basic income earn below 30% of area median income. Average monthly SSI payments are \$621 and average monthly Social Security Disability Insurance (SSDI) payments are \$1,233/month⁷⁹, while average rents in Thurston County are \$1,525/month⁸⁰.

According to advocates at the Arc of Washington, with the rising rental prices, individuals with developmental disabilities are not able to afford any housing options and end up getting stuck in more institutional settings (sometimes in hospitals or adult family homes that are geared towards older adults). Advocates also provided feedback that it is a challenge to find housing that is accessible and durable, with space to move around with assistive devices. They also noted that ADA requirements are the bare minimum, but often greater accessibility is needed. Often, people with developmental disabilities live in the community more successfully in smaller settings, not large apartment complexes, and need fully accessible features in housing, including sound mitigation, more durable materials, and large spaces to accommodate staffing for their care. Resources designed for persons experiencing homelessness and chronic mental health conditions, including Supportive Housing, generally do not meet the needs of the developmental disabilities community and their caregivers. People with developmental disabilities need both housing and services/supports to live successfully in the community and not enough people who are DDA eligible are receiving services.

⁷⁹ https://www.ssa.gov/policy/docs/quickfacts/stat_snapshot/

⁸⁰ <https://wcrer.be.uw.edu/wp-content/uploads/sites/60/2022/10/Washington-Apartment-Market-Report-Fall-2022-Final.pdf>

The Housing Authority of Thurston County has 6 units at McKenna Lane in Tumwater that are set aside for families with a household member with a developmental disability and for families pursuing higher education.

Project-Based Vouchers, by Project for Thurston County

Project Name	Population Served	Owner	City	Number of Units
B & B	Disabled-With Supportive Services	Behavioral Health Resources	Olympia	15
Evergreen Vista II	Families With Children, Households with Disabled Family Member, Victims of Domestic Violence-With Supportive Services	Mercy Housing	Olympia	50
Tumwater Cove	Disabled-With Supportive Services	Behavioral Health Resources	Tumwater	8
Tumwater Gardens	Homeless Disabled-With Supportive Services	Behavioral Health Resources	Tumwater	34

Source: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard

Non-Elderly Disabled Vouchers. These vouchers enable non-elderly persons or families with disabilities to access affordable housing on the private market.

Housing Vouchers (Housing Authority of Thurston County)

Total vouchers	Project based	Emergency Housing	Special Purpose Voucher			
			VASH	Family Unification Program	Non-elderly Disabled (NED)	Mainstream (Homeless, Non-elderly Disabled)
2,070	475	68	105	68	425	140

Source: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following in the jurisdiction and region?

Identify major barriers faced concerning:

- i. Government services and facilities
- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
- iii. Transportation

iv. Proficient schools and educational programs

v. Jobs

All survey respondents were asked to rate the accessibility of their neighborhood for people who use wheelchairs or other mobility devices. About 40% responded that their neighborhood is not accessible for people who use wheelchairs or other mobility devices.

318 respondents answered additional questions about their access needs or experiences related to their disability in the community.

- 24.8% indicated they have difficulty accessing transportation near where they live
- 23.6% indicated they have difficulty navigating their neighborhood due to lack of sidewalks, curb cuts, crosswalks or pedestrian lighting
- 8.8% have difficulty finding schools or childcare in their neighborhood that meets their child's disability-related needs

Disability community advocates stated there should be transit system improvements around pick-ups and drop-offs, rural routes should be more flexible to meet needs of riders, and there is a need for sidewalks, curb cuts, lighting, and covered bus stops to protect riders from the elements.

Advocates also noted the difficulty of accessing respite care, and suggested that jurisdictions could create recreational programs or day-camps that are inclusive of people with disabilities.

One respondent provided the following suggestion: *'Provide ALL individuals with disabilities with 100% disability/healthcare coverage no matter their income level, or provide secondary coverage to all those working with healthcare to cover 100% of costs after primary insurance coverage. This should include those qualifying as having a short-term disability. This would provide those with disabilities the opportunity to work, as many so desperately want to do but cannot risk losing their healthcare or having healthcare costs equal to more than their income when an employers insurance doesn't cover items like a new wheelchair or benefits don't kick for 6 months, or there are no healthcare benefits at all.'*

Another respondent stated: *'Seniors and Disabled seniors shouldn't have to wait to get on HUD or any other waiting list. I need help now and nothing available.'*

The table below shows level of education attained by Thurston County and Olympia residents with and without disabilities.⁸¹ As evident below, residents with disabilities graduate high school at lower rates. In Olympia, residents with a disability are nearly half as likely to have a Bachelor's degree or higher as residents without a disability. Educational attainment has an impact on ability to obtain living wage employment.

⁸¹https://data.census.gov/cedsci/table?q=Disability&g=0500000US53067_1600000US5351300&y=2020&tid=ACSS T5Y2020.S1811

EDUCATIONAL ATTAINMENT	Thurston County		Olympia	
	With a Disability	Without a Disability	With a Disability	Without a Disability
Less than high school graduate	9.9%	5.4%	11.2%	4.5%
High school graduate (includes equivalency)	29.9%	20.2%	27.4%	14.3%
Some college or associate's degree	35.7%	36.3%	32.7%	30.5%
Bachelor's degree or higher	24.6%	38.0%	28.6%	50.7%

Source: ACS 2016-2020 5-year Estimates

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

Intercity Transit provides transit services throughout Thurston County. Each of the buses have individual accessibility features, such as wheelchair lifts and ability to lower or 'kneel.' Additionally, Intercity Transit provides a "Dial-A-Lift" service to anyone with a disability who cannot access the fixed route bus system. This service is intended only for those trips preventing a person with a disability from riding the fixed route bus system. Rural Transit can modify its route by up to three-quarters (3/4) of a mile to accommodate riders' needs.

The process for requesting and obtaining reasonable accommodations to proficient schools, educational programs may vary by school district. The County has eight public school districts which are serviced by individual websites, and can be found on the Office of Superintendent of Public Instruction's website.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

Affordable housing is a key concern for people with disabilities and families who care for their loved ones with disabilities. People with disabilities experience higher rates of poverty and lower earnings than the general population, which affects their ability to save for a down payment or access a loan. Median home prices in Thurston County are approximately \$455,000. Families who care for disabled loved ones often experience lack of support services and may need to quit their jobs to provide essential care. Households with disabled family members may need additional rent or mortgage support, as well as foreclosure prevention services to remain stably housed.

Of the 328 respondents to the community fair housing survey who indicated they or a family member in their household has a disability, about 57% are renters (compared to 44% of respondents without a disability).

Fifty-seven (57) community survey respondents who have a disability indicated their goal is to buy a home in the next six months. About 91% identified the cost of housing as the biggest barrier to buying a home. A third of respondents stated the lack of available units for my needs/family size was a barrier to buying a home, 26% of respondents stated the accessibility of units available was a barrier to buying a home, and 25% stated application or screening barriers were a barrier to buying a home. Of those respondents who stated screening/application barriers were a concern, nearly 77% stated their income

is too low, 47% stated it was due to their debt-to-income ratio, and 33% stated it was due to their credit history.

A quarter of community survey respondents with a disability or disabled family member have been denied a mortgage loan compared to 15% of respondents without a disability. Nearly 14% of community survey respondents with a disability or disabled family member had difficulty accessing a loan compared to 9% of respondents without a disability. The top three reasons for mortgage loan denial are: income level (17% for respondents with a disability vs. 10% for respondents without disability), debt to income ratio (15% for respondents with a disability vs. 10% for respondents without a disability), and credit (16% for respondents with a disability vs. 7% for respondents without a disability).

Just over 10% of community survey respondents who have a disability believe they or someone they were subjected to different treatment or discrimination from a real estate agent and 5.5% believe a mortgage lender discriminated against them.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

People with disabilities are overrepresented in the population experiencing homelessness in Thurston County. In 2020, 708 of 995 individuals (roughly 71%) who were surveyed as a part of the Point in Time Count reported having a disability. Over 250 individuals (about 26%) reported having a mental health disability and over 200 individuals (about 20%) reported having a permanent physical disability. About 175 individuals reported they had a substance use disability, 100 reported having a developmental disability, and 50 reported having a chronic health condition. In the 2019 Point in Time Count, about 56% of individuals surveyed reported having a mental health related disability and 43% reported having a permanent physical disability. The most common sources of income (if any) reported by individuals experiencing homelessness in Thurston County are SSI/SSDI and Medicare/Medicaid.

A survey respondent experiencing homelessness stated: *'I am poor and on SSI how can I afford a place? Feels like I will always be homeless never have my own home and I feel hopeful I hate not having a home I just want a home!'*

According to the 2020 Point in Time report⁸², the Federal definition of “chronic homelessness” is someone who has experienced homelessness for at least a year (either 12 months or more in a row, or several shorter experiences of homelessness that add up to a year) while struggling with a disabling condition such as a serious mental illness, substance use disorder, or physical disability. For 2020, the Department of Commerce determined that 272 (27%) individuals met the criteria for chronic homelessness in Thurston County. Two of the top five causes for homelessness are directly disability-related: substance dependency and physical disability.

Community survey respondents who identified that they or a family member in their household has a disability experience homelessness at nearly three times the rate of respondents without disabilities (3.4% of respondents compared to 1.2% of respondents).

⁸² https://www.co.thurston.wa.us/health/sscp/PDF/2020%20Point%20in%20Time_Final.pdf

About 18% of the total 328 community survey respondents with a disability or disabled family member have experienced an eviction or foreclosure compared to 9.1% of respondents without a disability. About 32% feel they could be at risk of eviction or foreclosure in the next 6 months compared to 16.2% of respondents without a disability. The most common reasons people with disabilities identified for potentially losing their housing: rent/housing costs have increased too much, loss of income or employment, and high medical or healthcare costs. About 9% of people with disabilities say high medical or healthcare costs may cause them to lose their housing, compared to 2% of people without a disability. Just over 21% of respondents with a disability lost income due to illness during the COVID-19 pandemic compared to 11% of respondents without a disability.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.

In August 2021, Disability Rights Washington (DRW) released the report 'Transportation Access for Everyone: Washington State'⁸³ that includes transportation barriers faced by community members across Washington State, as well as recommendations to address those barriers. Five Thurston County residents were interviewed for the report.

One Lacey resident who was interviewed for the project uses a wheelchair and noted the biggest barrier he faces is the lack of accessible sidewalks. Sidewalks are often too narrow to safely navigate and curb ramps are misaligned, forcing him into oncoming traffic. He also notes that there is a lack of pedestrian lighting. Later and more frequent transit and paratransit services would allow more people to ride who get off work later in the day. The free bus fare on Thurston County transit routes was noted as a welcome move toward a more accessible transit system.

Another Lacey resident who has difficulty standing noted that paratransit requires riders to remain at each destination for a certain amount of time. If the errand is quick and she is forced to stand and wait, it can compound her condition. The lack of coordination between paratransit systems across county borders can make attending medical appointments or other trips difficult.

A Rochester resident noted that he is considering moving due to lack of reliable transit, but cannot afford the cost of living in areas with better transit. A Tenino resident is outside transit service areas and must rely on family and friends for rides.

A Lacey resident who commuted to Seattle left his home at 11am to ensure he'd be on time for work at 4:15pm. He noted that he'd need to wait for another bus if there were already two wheelchairs on board and would find more accessible public restrooms at transit stops helpful.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

No other relevant data was reviewed at the time of the report writing.

⁸³ <https://www.disabilityrightswa.org/transportation-access-for-everyone-research-paper-release/>

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings
- Other

Lack of affordable, accessible housing in range of unit sizes: According to the 2022 Out of Reach

report⁸⁴ by the National Low Income Housing Coalition, monthly rent of \$264 or less is affordable to individuals living on Supplemental Security Income at \$879/month (maximum monthly benefit). Supplemental Security Income (SSI) is a United States government program that provides stipends to low-income people who are either aged 65 or older, blind, or disabled. SSI payments will be increasing to a maximum of \$914 per month for a single individual in January 2023. Average rents in Thurston County in Fall 2022 are \$1,525⁸⁵.

SSI Recipients, Thurston County (December 2020)

County	Total	Aged	Blind and disabled	Under 18 years	18-64 years	65 or older
Thurston	5,451	375	5,076	582	3,777	1,092

Source: Social Security Administration⁸⁶

In 2020 in Thurston County, a person with a disability earned on average \$28,031, compared to \$40,747 earned by a person without a disability. In 2020 in Olympia, a person with a disability earned on average \$26,075, compared to \$37,168 earned by a person without a disability. In Thurston County, 16.1% of individuals with a disability live below the federal poverty level, compared to 8.3% for individuals without disabilities⁸⁷. In Olympia, 22.6% of individuals with disabilities live below the federal poverty level, while 13.3% of individuals without disabilities live below the poverty line.

Individuals with disabilities are overrepresented in the population experiencing homelessness in Thurston County, and directly report that their disability is the cause for their homelessness. Thurston County and City of Olympia have prioritized construction of permanent supportive housing with public funding in recent years (through Home Fund levy dollars), but the need exceeds the current units available.

Of the 328 community survey respondents who have a disability or a family member in their household with a disability, 53% have considered moving in past year because their housing doesn't meet their needs (compared to 36% of respondents without a disability). The number one reason that respondents with disabilities have considered moving is because housing is too expensive (43%), but 25% stated they can't get housing in the size they need for their family/household.

Local Veteran's Affairs staff who work with veterans experiencing homelessness indicate that it is very difficult to find both affordable and accessible units. Many of the senior housing units with greater accessibility or newer multifamily units are above the payment standards for HUD VASH (Veteran's Affairs Supportive Housing) voucher participants. Many of the VASH participants are in their sixties or seventies, use wheelchairs, and cannot reside in units with stairs. VA staff report that it is very difficult to find ground floor units and units with other accessibility features like walk-in showers. Many VASH

⁸⁴ <https://nlihc.org/oor/state/wa>

⁸⁵ <https://wcrer.be.uw.edu/wp-content/uploads/sites/60/2022/10/Washington-Apartment-Market-Report-Fall-2022-Final.pdf>

⁸⁶ https://www.ssa.gov/policy/docs/statcomps/ssi_sc/2020/wa.html

⁸⁷ ACS 2016-2020: https://data.census.gov/cedsci/table?q=Disability&g=0500000US53067_1600000US5351300&y=2020&tid=ACST5Y2020.S1811

participants also experience barriers due to their criminal history and housing providers in Thurston County are frequently denying applicants with any criminal background.

Lack of affordable, integrated housing for individuals who need supportive services: According to the Developmental Disabilities Administration (DDA), an estimated 170,635 Washingtonians have intellectual or developmental disabilities (IDD). There are 49,022 enrolled DDA clients and 1,382 Housing Trust Fund IDD set-aside units statewide, leaving an unmet housing need of an estimated 37,000 individuals with IDD in Washington State. According to the DDA, Thurston County has 1,569 DDA enrollees. Housing Authority of Thurston County provides Project-Based Vouchers to Homes First. Homes First has partnerships with community organizations which provide supportive living services. There are 33 units set aside for individuals with IDD.

All survey respondents were asked about their top five priorities to increase equity and address housing disparities for members of protected classes in Thurston County. Of the 605 respondents who provided their priorities, 95 (15.7%) selected better access to in-home care or other supports for people with disabilities.

Lack of assistance for housing accessibility modifications: Reasonable modifications (except for federally subsidized properties) are typically paid by the tenant in rental housing, or paid by a homeowner. Of the online community survey respondents who indicated they (or a family member in their household) have a disability, 56% require specific property criteria (such as few or no stairs, wider doorways, ground floor units), 32% need minor modifications to the property (grab bars, smoke detectors with visual alarm), and 11% need significant modifications to their housing unit, such as lowered countertops and wheelchair ramps. All survey respondents were asked about their top five priorities to increase equity and address housing disparities for members of protected classes in Thurston County. Of the 605 respondents who provided their priorities, 75 (12%) selected repairs or improvements to housing to increase accessibility for people with disabilities.

About half of all housing units in Thurston County were built before 1990 and only 13% of residential properties have 5 or more units (multifamily properties built after 1991 with 5+ units are subject to accessibility regulations in the Fair Housing Act). Data on age of multifamily units was not available at the time of this report writing to provide a better estimate of the number of multifamily units built after 1991. Additionally, not every individual who resides in a newer multifamily unit has a disability (or a disability-related need for accessibility features), and some single family or smaller housing units may be designed with accessibility features. While it is difficult to extrapolate the supply vs. the need for accessible units, it is clear from the low number of newer (more likely to be accessible) multifamily units compared to overall percent of the population with a mobility-related disability that there is a gap in accessible units.

Source of income discrimination & Private Discrimination: About 45% of community survey respondents with disabilities believe they or someone they know has experienced discrimination in Thurston County compared to 28% of respondents without disabilities. Over one-third (32%) say the discrimination was based on source of income (compared to 17% of respondents without disabilities) and 27% believe the discrimination was based on disability. Source of income can include SSI or SSDI, or other disability-related benefits and programs (such as housing vouchers designated for people with disabilities). About 25% say a housing provider refused to rent or deal with them, 22% say they were subjected to different terms or conditions, and 17% say they were denied a reasonable accommodation

or modification for their disability. Thirty-three of the 45 housing discrimination complaints filed for investigation in Thurston County are related to disability.

Access to transportation for persons with disabilities & Inaccessible public or private infrastructure:

Disability Rights Washington's 2021 report outlines some of the transportation challenges faced by people with disabilities across the state, but includes insights from five Thurston County residents. Accessible sidewalks, curb ramps, and pedestrian lighting were also noted as important improvements to accessing transit safely. Coordination between transit systems, later service, frequency of services, and paratransit policies (especially around pick-up and drop-off times) were also noted as needing improvement.

Seventy-five community survey respondents with disabilities or a disabled family member reported difficulty navigating their neighborhood due to lack of sidewalks, curb cuts, lack of crosswalks or pedestrian lighting. Seventy-nine survey respondents with disabilities or a disabled family member reported difficulty accessing transportation near where they live.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

Complaints alleging violations of fair housing law in Thurston County may be filed with HUD or the Washington State Human Rights Commission. These government enforcement agencies conduct investigations to examine evidence provided by both the complainant and respondent to determine whether there is reason to believe that discrimination occurred. Case investigations may result in a Reasonable Cause finding, which means there is evidence that discrimination (as defined in the law) occurred, or a No Reasonable Cause finding, which means that there is not enough evidence to demonstrate that discrimination (as defined in the law) occurred. The investigator may also assist the parties to the complaint in reaching a resolution through a settlement agreement. These agreements are legally binding and may involve compensation for damages alleged by the complainant, as well as non-monetary terms like: fair housing training for respondent(s), policy changes, posting fair housing information at the property, or granting a request by the complainant (e.g. early release from a lease, moving to a new unit, granting a reasonable accommodation). Complaints may also be administratively closed before a finding is issued or a settlement reached. Typically, cases are administratively closed

either due to a complainant’s failure to cooperate in the investigation (often because the complainant does not respond to the investigator’s attempts to contact them) or because the parties reached a resolution on their own.

In the past five years, forty-five complaints alleging a discriminatory housing practice in Thurston County were filed with HUD and/or the Washington State Human Rights Commission. Complaints were most frequently filed on the basis of disability status, race, and familial status. Thirty-three of the forty-five cases filed involved a disability discrimination claim, most often related to a failure to grant a reasonable accommodation. Ten of the forty-five cases involved an allegation of discrimination based on race, and four cases involved an allegation of family status discrimination.

The chart below shows the number of cases and outcomes by jurisdiction. There were two total cases filed against the Housing Authority of Thurston County, which both received a No Reasonable Cause Finding.

Number of case outcomes by jurisdiction (2017-2022)

	No Reasonable Cause Finding	Reasonable Cause Finding	Settlement reached	Administrative closure	Pending investigation	Total
Olympia	10	0	8	5	9	32
Tumwater	2	0	1	0	1	4
Lacey	2	0	0	0	3	5
Yelm	3	0	0	0	1	4

Source: HUD Region 10 office

As of June 13, 2022, there are **fourteen open cases** pending investigation alleging fair housing violations in Thurston County. Of the fourteen cases, nine are in Olympia, three are in Lacey, one is in Yelm and one is in Tumwater. Ten of the fourteen cases involve disability-based claims.

Bases	Issues	Date Filed	Violation City	Zip Code
Disability, Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	07/18/2019	Olympia	98501
Disability, Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	07/18/2019	Olympia	98501
Sexual Orientation, Retaliation, Disability, Creed	Discriminatory terms, conditions, privileges, or services and facilities	04/02/2020	Olympia	98502
Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc.)	08/06/2020	Olympia	98502
Race	Discriminatory terms, conditions, privileges, or services and facilities	12/09/2020	Lacey	98503
Disability	Discrimination in the terms/conditions for	02/04/2021	Lacey	98516

	making loans			
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	03/10/2021	Olympia	98506
Race	Discriminatory refusal to rent	07/12/2021	Lacey	98503
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	10/21/2021	Olympia	98513
Race, National Origin, Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc.)	11/01/2021	Olympia	98513
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	11/01/2021	Tumwater	98512
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	11/05/2021	Yelm	98597
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	11/17/2021	Olympia	98502
Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	04/06/2022	Olympia	98501

Source: HUD Region 10 office

In the past five years, nine cases were filed in Thurston County that resulted in a **settlement agreement**. Two cases were based on race and seven cases were based on disability status. All of the disability status cases involve a claim that the respondent failed to provide a reasonable accommodation to the complainant. All but one case was in Olympia.

Bases	Issues	Date filed	Date closed	Violation city	Zip code	Compensation amount
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	10/04/2017	02/22/2018	Tumwater	98512	0
Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	03/14/2018	06/28/2018	Olympia	98502	\$1,500
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	04/12/2018	07/26/2018	Olympia	98502	\$1,134
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	11/07/2018	04/18/2019	Olympia	98502	\$1,200
Race	Discriminatory terms,	11/05/2018	02/14/2019	Olympia	98516	\$500

	conditions, privileges, or services and facilities					
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	01/29/2019	6/27/2019	Olympia	98501	\$500
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	01/29/2019	05/21/2019	Olympia	98501	\$1,000
Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	01/16/2020	05/26/2021	Olympia	98502	\$4,467
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	01/24/2020	07/23/2020	Olympia	98502	\$95

Source: HUD Region 10 office

In the past five years, seventeen cases received a **No Reasonable Cause finding**, which means that the investigation determined that there was insufficient evidence to find that discriminatory treatment occurred.

Bases	Issues	Date Filed	Date closed	Violation City	Zip Code
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	06/07/2017	09/28/2017	Tumwater	98512
Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc)	07/13/2017	10/18/2017	Lacey	98516
Race, Religion	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	10/16/2017	02/22/2018	Olympia	98501
Retaliation	Discriminatory refusal to rent; Adverse action against an employee; Discriminatory acts under Section 818 (coercion, etc)	10/27/2017	12/18/2018	Olympia	98501
National Origin	Discriminatory terms, conditions, privileges, or services and facilities	01/19/2018	08/20/2018	Tumwater	98512

Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc); Failure to make reasonable accommodation	04/23/2018	01/14/2019	Olympia	98512
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	11/21/2018	06/13/2019	Olympia	98501
Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	07/30/2018	02/28/2019	Olympia	98502
Race	Discriminatory terms, conditions, privileges, or services and facilities	10/05/2018	03/19/2019	Olympia	98516
Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	03/04/2019	07/25/2019	Yelm	98597
Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	03/04/2019	07/25/2019	Yelm	98597
Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, etc)	02/20/2020	11/19/2020	Olympia	98502
Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	10/08/2020	07/29/2021	Olympia	98516
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc); Failure to make reasonable accommodation	04/08/2020	02/24/2022	Olympia	98502
Race, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	07/11/2020	07/29/2021	Lacey	98503
Disability	Discriminatory refusal to rent and negotiate for rental	06/08/2021	10/28/2021	Yelm	98597
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	06/29/2021	11/18/2021	Olympia	Not provided

Source: HUD Region 10 office

Three cases in the last five years were closed because the complainant decided to withdraw the complaint after reaching a resolution with the respondent, but before a formal finding or settlement agreement was issued.

Bases	Issues	Date filed	Date closed	Violation city	Zip code
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	09/27/2017	05/24/2018	Olympia	98502
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	07/24/2017	01/24/2018	Olympia	98506
Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable modification	08/10/2017	09/28/2017	Olympia	98502

Source: HUD Region 10 office

Two cases were closed before a settlement was reached or finding issued because the complainant withdrew the complaint or failed to cooperate with the investigation.

Bases	Issues	Date filed	Date closed	Violation city	Zip code	Closure reason
Marital Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	10/01/2020	06/24/2021	Olympia	98501	Withdrawal
Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	04/16/2019	12/04/2019	Olympia	Not provided	Complainant failed to cooperate

Source: HUD Region 10 office

It is also worth noting a lawsuit filed by the Washington State Attorney General's office in 2018 against an apartment complex in Yelm. An investigation was launched by the Attorney General's Office in 2016 to identify illegal housing discrimination against veterans with disabilities, which led to enforcement action against eight companies statewide. The investigation found that property management companies around the state were improperly rejecting Veterans Affairs Supportive Housing (VASH) vouchers. Lawsuits were filed alleging illegal discrimination on the basis of veteran and disability status under the Washington State Law Against Discrimination. The provisions in the Washington State Landlord-Tenant Act to prohibit discrimination based on source of income or use of a voucher for rent payment were proposed, but at that time, had not yet been passed by the State Legislature. Those protections were passed in the 2018 legislative session.

It is also of regional importance that the Washington State Attorney General’s office filed lawsuits in 2017⁸⁸ against several rental property management companies that had blanket ‘no felony’ policies as a criteria for renting, in violation of the Fair Housing Act and Washington State Law Against Discrimination. Under fair housing case law, criminal history restrictions that have a disproportionate impact on people of color may violate fair housing laws, due to disparities in the criminal justice system. The legal theory ‘disparate impact’ has been used to describe policies that appear neutral on their face but have a discriminatory impact. HUD-issued guidance in 2016⁸⁹ that describes their ability to investigate complaints based on race and criminal history (even though criminal history is not a protected class), due to the disproportionality in arrest and incarceration rates for people of color (particularly Black and Hispanic/Latinx individuals). HUD’s guidance also provides direction to rental housing property owners to evaluate whether their criminal history policies have a disparate impact on people of color.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The Washington State Law Against Discrimination⁹⁰ provides fair housing protections for the following protected classes:

- Race
- Creed
- Color
- National origin
- Citizenship or immigration status
- Sex
- Family Status
- Marital Status
- Honorably discharged veteran or military status
- Sexual orientation and gender identity
- The presence of any sensory, mental, or physical disability or the use of a trained dog guide or service animal by a person with a disability

Both State and Federal fair housing laws apply throughout Washington State. Local jurisdictions have additional protected classes, including age⁹¹ and use of Section 8 voucher/source of income⁹².

⁸⁸ <https://www.atg.wa.gov/news/news-releases/ag-takes-discriminatory-blanket-housing-bans-renters-criminal-histories>

⁸⁹ https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF

⁹⁰ [RCW 49.60](#)

⁹¹ [Thurston County Code of Ordinances, Chapter 10.10](#) and [Tumwater Unfair Housing Practices Code 5.70](#)

⁹² [Olympia Unfair Housing Practices Code 5.80](#) and [Tumwater Unfair Housing Practices Code 5.70](#)

The table below compares the protected classes by jurisdiction in Thurston County and Washington State.

Protected Class	Washington	Thurston County	Olympia	Tumwater	Lacey	Yelm	Tenino
Race	X	X	X	X	X	X	X
Color	X	X	X	X	X	X	X
Religion/Creed	X	X	X	X	X	X	X
Sex/Gender	X	X	X	X	X	X	X
Gender Identity	X		X				
Sexual Orientation	X	X	X	X	X		
Disability	X	X	X	X	X	X	X
Use of dog guide or service animal	X	X	X	X	X		
Families with children	X	X	X	X	X	X	X
National Origin/Ancestry	X	X	X	X	X	X	X
Immigration/Citizenship status	X			X			
Marital Status	X	X		X	X	X	X
Age		X		X		X	X
Honorably Discharged Veteran or Military Status	X			X			
Section 8 recipient/Source of Income	See explanation below		X	X			
Retaliation	X						

In 2018, source of income protections were added to the Washington State Residential Landlord-Tenant Act⁹³. Source of Income as defined under State law includes benefits or subsidy programs including housing assistance, public assistance, emergency rental assistance, veterans benefits, social security, supplemental security income or other retirement programs, and other programs administered by any federal, state, local, or nonprofit entity. The law provides similar protections as fair housing laws, but isn't included as a protected class under the Washington State Law Against Discrimination and therefore complaints cannot be filed for investigation with the Washington State Human Rights Commission. Tenants can pursue civil action and may recover monetary damages if a violation of the law is found. Landlords are prohibited from subjecting tenants to differential treatment based on their source of income, including the following prohibited acts:

- Discouraging or refusing to rent or lease
- Subjecting a tenant to different terms and conditions
- Represent that a dwelling unit is not available when it is in fact available
- Coerce, intimidate, threaten, or interfere with a person's exercise or enjoyment of any right granted or protected under this section of the law
- Advertise any preference, limitation or requirement based on source of income

⁹³ [RCW 59.18.255](#)

Additionally, if a landlord requires that a prospective or current tenant have a certain threshold level of income, any source of income in the form of a rent voucher or subsidy must be subtracted from the total of the monthly rent prior to calculating if the income criteria have been met.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The Department of Housing & Urban Development (HUD) has a Seattle-based office that investigates fair housing complaints to determine if there has been a violation of the Federal Fair Housing Act. HUD also refers cases for investigation to the Washington State Human Rights Commission, which has authority to investigate violations of both the Federal Fair Housing Act and the Washington State Law Against Discrimination. Both HUD and the Washington State Human Rights Commission are enforcement agencies, meaning they complete investigations as a neutral third party to determine whether there has been a violation of fair housing laws. Both agencies also provide information and education.

The Washington State Human Rights Commission has an office in Olympia, as well as several statewide field offices. In the past few years, the Washington State Human Rights Commission has had a several month backlog of cases, waiting to be assigned to an investigator. Only 3-5 investigators are available statewide to investigate fair housing complaints.

The Fair Housing Center of Washington is based in Tacoma, but serves Western and Central Washington. The Fair Housing Center of Washington is an advocacy organization, which helps individuals file fair housing complaints, conducts fair housing testing to identify violations of the Fair Housing Act, offers education and information to the community, conducts both paid and free trainings, offers self-help and advocacy resources to help individuals with disabilities to request reasonable accommodations or modifications.

Both the Washington State Human Rights Commission and the Fair Housing Center of Washington provide information and technical assistance, but have limited capacity and funding to conduct outreach to meet the needs of the large geographic area they serve. The Fair Housing Center of Washington has hosted online webinars and has a video library of recordings on their website to reach a broader audience.

In prior years, HUD referred cases to other agencies (including City of Seattle and unincorporated King County) that had authority to conduct fair housing investigations that occurred in their jurisdiction because their local fair housing laws were substantially equivalent to federal law. Currently, HUD is only referring cases for investigation to the Washington State Human Rights Commission, resulting in an increased number of cases handled by Commission investigators. In the past, the Fair Housing Partners of Washington (comprised of jurisdictional enforcement agencies and the two advocacy organizations in the state) took turns offering fair housing trainings throughout the year. These regularly scheduled trainings are not currently offered.

4. Additional Information

For questions (4)(a) and (b), program participants may include any additional relevant information related to their analysis of fair housing enforcement, outreach capacity, and resources in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, where any such actions are designed to achieve fair housing outcomes such as

reducing disproportionate housing needs, transforming expanding opportunity into R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.

The Rental Housing Workgroup, a local coalition of governmental and nonprofit organizations, meets regularly to address challenges in the rental housing market and provide community education. In January 2022, the Fair Housing Center of Washington provided an online fair housing training hosted by the workgroup. Invitations to the training were extended to local tenants, landlords, nonprofit organizations, Housing Authority staff, and governmental organizations. The workgroup is currently creating a curriculum for renters which will include fair housing information.

The City of Olympia includes information about protected classes and referrals to fair housing resources on their [webpage](#). [Thurston County Public Health & Social Services](#) provides a link to HUD's Fair Housing and Equal Opportunity Limited English Proficiency resources webpage. The [Housing Authority of Thurston County](#) provides a link to the Washington State Human Rights Commission's fair housing webpage.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

Lack of local public and private fair housing enforcement, and lack of resources for fair housing agencies and organizations - The Washington State Human Rights Commission is the only organization in the jurisdiction which provides fair housing information and enforcement. The Human Rights Commission has limited capacity for outreach and has a backlog of cases awaiting investigation. The Fair Housing Center of Washington is located outside the jurisdiction, but their service area includes Thurston County. All of the local jurisdictions that have fair housing protections refer all applicable complaints for investigation to the Human Rights Commission. Any complaints alleging violations that are not covered under the Washington State Law Against Discrimination or Fair Housing Act (age and source of income) are referred to a third-party mediator.

The Northwest Justice Project's office in Olympia provides counsel on fair housing rights to tenants, may assist tenants in requesting reasonable accommodation, and provides counsel on source of income protections. Thurston County Volunteer Legal Services (TCVLS) provides landlord-tenant advice clinics and eviction representation. TCVLS volunteer and staff attorneys provide limited counsel and advice on fair housing issues to tenants (particularly if it is a defense to eviction). There are very few private attorneys in Washington State who are familiar with fair housing issues and who represent complainants.

There is a lack of enforcement for source of income discrimination, which is under the Washington Residential Landlord-Tenant Act. Since these protections are tenant-enforced, it can be difficult for tenants to navigate the legal process and access remedies. According to the community survey, source of income was the most common form of discrimination faced by Thurston County residents.

Only 12% of community survey respondents who reported an experience of discrimination filed a complaint. Of the respondents who reported they experienced or know someone who experienced discrimination but did not file a complaint, 63% didn't pursue filing a complaint because they didn't think it would make a difference and 68% didn't know who to contact.

Housing Authority of Thurston County staff receives training from HUD, a third-party vendor who specializes in Public Housing Authorities (PHAs), and its insurance provider that specializes in PHAs, as well as staff have participated in local forums, or workshops.

VI. Fair Housing Goals and Priorities

1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Over 600 community survey respondents prioritized the top five strategies to increase equity and address housing disparities for members of protected classes in Thurston County. The first priority was clearly ranked highest and was consistent among various protected class groups. The first four priorities were consistent across many protected class groups:

1. More affordable housing and/or financial assistance for housing for low-income individuals and families
2. Increasing access to homeownership
3. Housing in a variety of types and sizes to meet various family sizes and needs
4. Reducing barriers to accessing housing (ex: criminal history, credit history)

While there wasn't a clear fifth priority, many individuals highly ranked the following strategies:

- Better enforcement of fair housing laws
- Better enforcement of source of income protections (disability-related income, Section 8 voucher, etc)
- Education about responsibilities under fair housing laws for landlords, realtors and other housing providers
- Education about rights under fair housing laws for members of protected classes

Through review of data, community survey results, and consultation with community organizations, the following factors were selected as key contributors to fair housing issues in Thurston County. Thurston County has a fairly low level of segregation (as noted by the Dissimilarity Index) and no HUD-designated R/ECAPs. Key issues for Thurston County are housing cost burden and lack of affordable housing. Members of protected classes are primarily limited in their housing choice by housing costs. Persons with disabilities are further limited by lack of accessible units.

Lack of affordable, accessible housing in range of unit sizes: Lack of affordable housing impedes Fair Housing choice for protected classes who are disproportionately low income.

Community survey respondents were asked what (if any) barriers kept them from meeting their housing goals. Cost of housing was listed as the number one barrier to meeting community survey respondents' housing goals. Over 55% of respondents reported that cost of housing was a barrier to meeting their housing goal. About 74% of American Indian or Alaska Native respondents, 69% of Black or African American respondents, and 67% of Native Hawaiian or other Pacific Islander respondents indicated cost of housing was a barrier to meeting their housing goal.

Washington's current minimum wage is \$14.49/hour and is increasing to \$15.74/hour in January 2023. According to the 2022 'Out of Reach' report by the National Low Income Housing Coalition, a Thurston County renter earning minimum wage would need to work 57 hours per week to afford a 1-bedroom apartment, would need to work 68 hours per week to afford a 2-bedroom apartment, and would need to work 96 hours per week to afford a 3-bedroom apartment. The annual income needed in Thurston County to afford a 1-bedroom unit is \$43,040. Annual income of \$50,920 is needed to afford a 2-bedroom unit and \$72,320 is needed to afford a 3-bedroom unit in Thurston County. Monthly rent of \$264 or less is affordable to individuals living on Supplemental Security Income at \$879/month (maximum monthly benefit). Supplemental Security Income (SSI) is a United States government program that provides stipends to low-income people who are either aged 65 or older, blind, or disabled. SSI payments is increasing to a maximum of \$914 per month for a single individual in January 2023.

Many more households are eligible than receive assistance from the Housing Authority of Thurston County (HATC). HATC maintains a waiting list, which was last opened to new applicants in January 2020. Prior to that date, the waiting list was last opened in 2015. Currently there are 1,252 households on the waiting list. Of these 1,252 applicants, about 20% are Black or African American. There are an estimated 25,003 households in Thurston County that earn below 50% of Area Median Income, who may be eligible for housing assistance if there was sufficient capacity to meet the need.

The Housing Authority of Thurston County assists approximately 1,815 households with rental assistance vouchers. HATC is limited by the number of rental assistance vouchers and funding. Due to increasing housing costs in Thurston County, HATC is constricted primarily by funding. HATC is currently spending about 103% of its annual budget provided by HUD, so cannot utilize all of its 2,070 allotted vouchers. Many voucher participants have disabilities and fixed incomes that do not increase proportionate to the local rental market, so HATC must pay a higher subsidy to meet rising rental costs.

HATC is also not typically able to assist households with deposits or move-in costs. As those costs increase, it can be difficult for voucher participants to locate units that meet payment standards, as well as pay the required move-in costs. If a household's rent increases beyond payment standards, the household must pay the difference.

As rents sharply increased after the eviction moratorium ended in October 2021, many households were faced with sudden, large rent increases. According to a Fall 2022 report released by the Washington Center for Real Estate research, the average rent in Thurston County was \$1,525 (\$1,387 for a 1-bedroom unit and \$1,663 for a 2-bedroom unit). In the past five years, average rents have increased approximately 47%. From 2021 to 2022, average rents increased about 31%.

Of 80 survey respondents who indicated they have a subsidy or voucher that helps to pay their rent, 53 respondents stated their rent had increased in the past 12 months.

Local Veteran's Affairs staff who work with veterans experiencing homelessness indicate that it is very difficult to find both affordable and accessible units. Many of the senior housing units with greater accessibility or newer multifamily units are above the payment standards for HUD VASH (Veteran's Affairs Supportive Housing) voucher participants. Many of the VASH participants are in their sixties or seventies, use wheelchairs, and cannot reside in units with stairs. VA staff report that it is very difficult to find ground floor units and units with other accessibility features like walk-in showers.

According to the Developmental Disabilities Administration (DDA), an estimated 170,635 Washingtonians have intellectual or developmental disabilities (IDD). There are 49,022 enrolled DDA clients and 1,382 Housing Trust Fund IDD set-aside units statewide, leaving an unmet housing need of an estimated 37,000 individuals with IDD in Washington State. According to the DDA, Thurston County has 1,569 DDA enrollees. Housing Authority of Thurston County provides Project-Based Vouchers to Homes First. Homes First has partnerships with community organizations which provide supportive living services. There are 33 units set aside for individuals with IDD.

While there is not an accurate inventory of housing units accessible to people with disabilities, only about half of all housing units in Thurston County were built after 1990 and only 13% of residential properties have 5 or more units (multifamily properties built after 1991 with 5+ units are subject to accessibility regulations in the Fair Housing Act).

Private discrimination: Forty-five fair housing complaints were filed with HUD and the Washington State Human Rights Commission in the past five years in Thurston County. According to the community survey results, many individuals who have experienced housing discrimination do not pursue complaint filing. Of the 613 total respondents to the online community survey, 37% believe they or someone they know has experienced housing discrimination in Thurston County and 20% were not sure if they or someone they know had experienced housing discrimination. Only 12% of survey respondents who believed they (or someone they know) experienced housing discrimination stated they filed a complaint. This indicates that there is a much higher rate of discrimination experienced by Thurston County residents than is reported to HUD or the Washington State Human Rights Commission. The most common discriminatory acts reported by respondents were: refusal to rent or deal based on a protected class, different terms or conditions, and falsely told housing was not available when in fact it was available. Private rental discrimination was the most frequently reported by survey respondents, with 97% of respondents reporting that a landlord or property manager discriminated against them or someone they know.

The Washington State Human Rights Commission is the only organization in Thurston County which provides fair housing information and enforcement. The Human Rights Commission has limited capacity for outreach and has a backlog of cases awaiting investigation. The Fair Housing Center of Washington is located outside the jurisdiction (in Tacoma), but their service area includes Thurston County.

Source of income discrimination: Source of income was the most reported basis for housing discrimination in the community survey. Source of income includes benefits or subsidy programs including housing assistance, public assistance, emergency rental assistance, veterans' benefits, social security, supplemental security income or other retirement programs, and other programs administered by any federal, state, local, or nonprofit entity. About 25% of all survey respondents (155 individuals) reported that they or someone they know has experienced housing discrimination in Thurston County due to their source of income. In Washington State, source of income discrimination is prohibited in the Residential Landlord-Tenant Act (rather than the Washington Law Against Discrimination, which is enforced by the Washington State Human Rights Commission). There is a lack of enforcement for source of income discrimination, which is under the Washington Residential Landlord-Tenant Act. Since these protections are tenant-enforced, it can be difficult for tenants to navigate the legal process and access remedies.

Displacement (or risk of displacement) of residents due to economic pressures: High demand for housing and low vacancy rates are causing displacement of low-income persons, including protected classes, due to economic pressures. The Washington State Legislature passed SB 5160 in 2021, which made Washington the first state to guarantee legal counsel to low-income tenants in eviction proceedings. Right to Counsel data⁹⁴ from January 2022 to October 2022 indicates that Black or African American and Native Hawaiian or other Pacific Islander tenants were overrepresented in eviction proceedings in Thurston County at nearly three times the rate of their proportion of the population. While Black or African American individuals comprise about 3% of Thurston County's general population, 8.5% of tenants assisted through Right to Counsel in 2022 were Black or African American. While Native Hawaiians or other Pacific Islanders comprise about 0.9% of Thurston County's population, they represented 2.8% of clients assisted by Right to Counsel for an eviction. Additionally, 26% of tenants assisted by Right to Counsel had a disability, compared to 14% of the general population.

Community survey respondents were asked about their experiences of displacement and fear of losing their housing. About 19% (7 of 37) Hispanic/Latinx respondents reported that they have experienced eviction or foreclosure, compared to 15% of white respondents. More people of color than white respondents worry they are at risk of eviction or foreclosure in the next 6 months. About 43% of American Indian or Alaska Native respondents (15 of 35), 41% of Hispanic/Latinx respondents (15 of 37), 34% of Black or African American respondents (10 of 29), and 33% of Native Hawaiian or other Pacific Islander respondents (2 of 6) feel you could be at risk of eviction or foreclosure in the next 6 months, compared to 25% of white respondents. Across race and ethnicity, increasing rent/housing costs was the most reported reason contributing to fear of eviction or foreclosure, followed by loss of income or employment.

Community survey respondents were asked: 'In the past year, have you considered moving out of the city or county where you currently live because your housing does not meet your needs?' Nearly 67% of Native Hawaiian or other Pacific Islanders, 62% of Black or African American and 57% of American Indian or Alaska Native respondents had considered moving in the past year, compared to 46% of white respondents. Across race and ethnicity, the most reported reason for considering relocation was it is too expensive where they currently live.

⁹⁴ <https://ocla.wa.gov/wp-content/uploads/2022/10/Right-to-Counsel-Dashboard-10-17-22.xlsx>

Respondents were also asked if they had been forced to move in the past five years. About 20% of American Indian or Alaska Native respondents had been forced to move due to their landlord selling the unit, renovating the unit, or moving back into the unit. About 14% of Black or African American respondents experienced displacement when the rent increased after the landlord made improvements or repairs to the unit, compared to 8% of white respondents.

Low-income residents and members of protected classes may be forced into more tenuous living arrangements, if they are not able to afford housing for their household. Community advocates and survey respondents described overcrowded or substandard living conditions, due to lack of affordable units. Several survey respondents noted that they are living in RVs that need repair, are staying in unsustainable temporary situations with friends or family, or unsafe arrangements.

Land Use and Zoning Laws: According to Housing Authority of Thurston County (HATC) staff, voucher participants struggle to qualify for single-family homes or manufactured homes due to Housing Choice Voucher (HCV) program requirements that participants cannot pay more than 40% of their adjusted income towards rent and utilities. The HUD-set Fair Market Rents, which are utilized to set payment standards, has not kept pace with the increasing rents in Thurston County. Even marginal single-family homes and manufactured homes are outside the HATC payment standards. HATC has set its payment standards to the maximum allowed by HCV regulations. Multifamily housing integrated into neighborhoods that have traditionally been zoned for single-family homes will decrease segregation and increase access to opportunities for voucher participants, who are more diverse than the general population.

Communities have traditionally had many requirements for multifamily housing including amenities such as onsite parking, fire access, buildings that “match” the character of the neighborhood and traffic impact studies, etc. All these requirements of multifamily housing projects increase the initial cost and result in housing that expensive to build and maintain. Much progress has been made in recent years by local jurisdictions, including:

- More flexibility for duplexes, triplexes, fourplexes, sixplexes and courtyard apartments in residential zones;
- Allow accessory dwelling units (ADUs) in all residential zones
- Free, pre-approved ADU building plans;
- Increased max size and height, relaxed sprinkler rules and no longer require additional parking space or for the owner to live onsite;
- Allow group homes in all residential zones and commercial zones that allow residential units;
- Density and height bonuses for affordable housing;
- Impact fee waivers for affordable housing;
- Reduced parking requirements for affordable housing located near transit lines.

However, the legacy of preference toward single family zoning has lasting impacts, and there are still considerable requirements to develop multifamily housing, which add to project costs.

Screening policies and criteria: Considering the cost of housing, income to rent ratios where applicants are required to make three times (or more) the monthly rent are not attainable for many Thurston County residents. Low vacancy rates in combination with high rental prices have created a very

competitive market, where there is less flexibility for tenants with barriers such as low or no credit, previous evictions, high debt to income, or other screening challenges.

Screening criteria often create barriers for voucher holders to access housing, even with rent subsidies offering a guaranteed form of payment. According to HATC staff, primary reasons for rejection include: lack of rental history, lack of credit, debt to income ratios, and evictions. Even if a judgement associated with an eviction has been paid by the tenant, applicants with vouchers are still being rejected by property owners.

According to the report 'Explaining the Black-White Homeownership Gap' by the Urban Institute, 'more than 50 percent of white households have a FICO credit score above 700, compared with only 20.6 percent of black households. Thirty-three percent of black households with credit histories have insufficient credit and lack a credit score, while only 17.9 percent of white households have missing credit scores.' The report goes on to explain: 'This is a key point because in the housing context, we know that most black households are renters and that rental payments are largely unreported to traditional credit bureaus. A black household may not own a home and pays only for rent, utilities, cell phones, and similar recurring expenses, but these transactions are not reported to credit bureaus in any positive way. Derogatory and negative credit reporting is common, but no credit is given for on-time payments of such critical and basic household items that would continue to apply in ownership.'

According to the Department of Commerce report on homeownership disparities, 'debt-to-income ratios (DTIs) are the most common reason Black applicants are denied loans. Lack of credit and poor credit present as barriers to accessing a lower interest rate loan for many prospective buyers of color. Researchers highlight how "decades of discrimination in employment, lending policies, debt collection, and criminal prosecution have left generations of Black families vulnerable to financial insecurity and negatively impacted median credit scores."'

In consultation with community advocates, credit history has been identified as a common barrier to accessing housing (both rental and ownership) for multiple protected class groups. There is a gap in credit counseling and debt repair programs in Thurston County. Domestic violence survivors often experience financial abuse, which may include a perpetrator opening credit cards or bank accounts in the survivor's name. Community members with disabilities often have medical debt. Undocumented community members lack a Social Security number, are often paid in cash, and have difficulty establishing credit history.

One community survey respondent suggested that community members who do not have U.S. citizenship should be able to use an ITIN (individual tax identification number) to apply for a mortgage. Due to barriers and cost of the legal process, CIELO reported that many undocumented community members do not have an ITIN or work permit. Many undocumented community members purchase homes by using a family member's name who has credit history.

Respondents were asked which screening or application barriers concern them. Most respondents selected their income is too low and debt to income ratios are a barrier. Nearly 45% of Asian respondents, 41% of Black or African American respondents, 35% of American Indian or Alaska Native respondents, 33% of white respondents, and 32% of Hispanic/Latinx respondents indicated their income is too low to meet their housing goals. Nearly 35% of Black or African American respondents and 31% of Asian respondents indicated their debt-to-income ratio is a barrier, compared to about 20% of white

respondents. Credit history was the third most reported response. Black or African American, Asian, and Native Hawaiian or Pacific Islander respondents were more likely than white respondents to report that credit history was a barrier.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

While contributing factors to fair housing issues were considered countywide, every jurisdiction may not undertake each of the following goals. Some goals may best be pursued regionally, and others may be undertaken by one or more cities.

Many of these goals align with work outlined in local Housing Action Plans, the Regional Housing Council's Permanent Supportive Housing Strategy, Thurston County's 5-Year Homeless Crisis Response Plan and/or work underway by Housing Action Team subgroups. The Regional Housing Council's new Advisory Boards for Affordable Housing and Homeless Services could also provide guidance on these goals and priorities to ensure efforts make an impact on the disparities and fair housing issues identified. The Regional Housing Council's Permanent Supportive Housing Strategy sets a goal to develop 150-200 permanent supportive housing (PSH) units by 2024, using the goal metrics from Thurston County's Homeless Crisis Response Plan (for 2019-2024).

Thurston County's 5-Year Homeless Crisis Response Plan for 2019-2024 established broad goals to:

- Create 300 permanent supportive housing (PSH) units
- Increase affordable housing inventory regionally
- Strengthen and extend multi-family tax exemptions to create 400 units
- Explore increased housing densities

A regional Housing Needs Assessment and resulting individual Housing Action Plans for Lacey, Olympia, and Tumwater includes goals to:

1. Reduce housing costs for low-income and cost-burdened households
2. Increase the overall housing supply
3. Increase the variety of housing sizes and types
4. Increase senior housing options
5. Maintain in good condition and improve the existing housing stock
6. Provide safe, stable options for both renters and homeowners
7. Increase permanent housing options for people with disabilities and those at risk of or experiencing homelessness

Goal 1: Increase affordable housing; provide financial assistance for housing for low-income individuals and families	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Support expansion of affordable housing inventory</p> <p>2) Increase affordable housing stock with development incentives</p> <p>3) Provide distribution of rental assistance to low-income households</p> <p>4) Explore options for tenant relocation assistance</p>	<p>-Lack of affordable, accessible housing in range of unit sizes</p> <p>- Displacement of residents due to economic pressures</p>	<p>-Segregation</p> <p>-Disparities in access to opportunities</p> <p>-Disproportionate Housing Needs</p>	<p>1) Funding for development or acquisition of housing units affordable to low-income households (below 80% AMI): 300 units over 5-year period (by end of 2027)</p> <p>2) Creation of resource page or developer toolkit to inform developers of affordable housing incentives: by end of 2025</p> <p>3) Locate additional funding for rental assistance to low-income households (particularly those at risk of eviction) and/or incentives for property owners to keep rents lower: by end of 2026</p> <p>4) Consider and recommend any relocation assistance programs for adoption: by end of 2026</p>	<p>-RHC & Advisory Boards</p> <p>-County</p> <p>-Cities</p>
<p>Discussion: Local jurisdictions should continue to prioritize efforts to develop more affordable housing (housing that is affordable to households earning 80% or less than Area Median Income), particularly for lower income households (below 50% AMI), and leverage local funding with state/other funding sources. Jurisdictions have and should continue to prioritize development of affordable housing development or permanent supportive housing in allocating CDBG HOME American Rescue Plan, SHB 2060, Home Fund (HB1590), and HOME-ARP funds. Cities have and should continue to donate or lease surplus or underutilized jurisdiction-owned land to developers that provide housing affordable to low-income households.</p>				

Cities have and should continue to explore ways to make it easier for developers to build affordable units or incentivize development of affordable units. Jurisdictions could create expedited permit processing times and/or streamline land use process for affordable housing development.

Stakeholders have shared feedback that creation of a developer toolkit (or other centralized resource information) would be helpful. This resource would outline incentives and programs for affordable housing development offered by local jurisdictions. Cities with a Multifamily Tax Exemption program could offer an option for developers to pay into an affordable housing fund, rather than include affordable units, that cities can leverage for other projects.

Local jurisdictions or the RHC could offer deeper subsidies or higher scoring on RFPs for developers who include more set-aside units that are accessible to people with disabilities, affordable to lower income households, and/or market units to community organizations serving protected class groups.

Document recording fees will contribute to local funding for rental assistance, but local jurisdictions could supplement those funds—particularly for low-income renter households that are at risk of eviction and homelessness. Thurston County was able to distribute COVID-19 rental assistance to community groups by contracting with organizations such as CIELO, who helped deploy assistance to Spanish-speaking and immigrant community members.

Cities could explore tenant relocation assistance programs and/or move-in cost support to help low-income households transition to new housing. Under [RCW 59.18.440](#), Washington State authorizes jurisdictions to implement a relocation assistance program (cost may shared by city and by landlord) for tenants who are displaced when a housing unit is substantially renovated, demolished, condemned, or converted to another use (such as apartments to condos). Cities could also explore implementation of an Economic Displacement Relocation Assistance program, such as Seattle implemented in 2022. [Seattle’s ordinance](#) requires landlords to pay relocation assistance to low-income tenants who have been displaced by a substantial rent increase.

Goal 2: Increase access to homeownership	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
1) Provide support for low to moderate income households to access homeownership	-Lack of affordable, accessible housing in range of unit sizes	-Disparities in access to opportunities -Disproportionate Housing Needs	1) Provide funding for homeownership activities (such as credit counseling or down payment assistance): by end of 2024	County Cities Housing Action Team
2) Explore non-traditional ownership models (limited equity co-ops, land trusts, etc)	-Displacement of residents due to economic pressures		2) Review options for nontraditional and affordable homeownership: share study findings by early 2024	RHC & Advisory Boards

<p>3) Strengthen partnerships with homeownership partners and share information with public when funding opportunities or programs become available (WA State Housing Finance Commission, programs by financial institutions, nonprofits, etc)</p>			<p>3) Create and/or share web-based information with public regarding homeownership support (focus on community groups who have had less access to homeownership opportunities): 2-4 times each year</p>	
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Discussion: One barrier identified to homeownership is no or low credit history to qualify for a mortgage. Thurston County has a gap in credit counseling or repair programs. Habitat for Humanity of South Sound has indicated that credit counseling programs are most effective when tailored to the individual and facilitated by a presenter that can convey information in an easily understandable format that is relevant to their experience (sometimes this is not the case with a bank or other financial institution). Any credit counseling or other homeownership support activities should include wraparound services that connect prospective homebuyers with resources and programs to guide them through the process of purchasing a home.

Washington State Department of Commerce has a [Homeownership Disparities Workgroup](#) that recently published a [report](#) on reducing disparities in homeownership for people of color. Jurisdictions can learn more by attending meetings and becoming better connected with the new Homeownership Unit created by Commerce. Organizations are developing programs such as [first-generation homebuyer assistance](#), [special purpose credit programs](#) and other [initiatives](#) designed to provide homeownership assistance to [people of color](#) or others who have had less access to homeownership opportunities.

Jurisdictions can explore options and program models that will lessen the gap in homeownership for our community, and funding for the best-suited program to our community’s needs. City of Olympia will be exploring models for affordable homeownership in a housing study in 2023. Study results may be shared with the Regional Housing Council. Thurston County could also explore any additional property tax exemptions or relief programs that would allow low-income households to purchase a home. Lower income households are not able to qualify for mortgage loans due to high home values and property taxes are taking up an increasingly larger portion of that value. There is no housing inventory available in the price range accessible to lower income households who are served by many of the available local and state assistance programs.

Jurisdictions have partnered with Habitat for Humanity of South Sound to provide donated land or land at a reduced cost, and other incentives to support homeownership activities. Cities can provide education to developers and incentives for use of the 20-year Multifamily Tax Exemption to sell to a

nonprofit to create affordable homeownership units.

Jurisdictions can provide information to the public about programs that help low to moderate income households access homeownership offered by local or state programs and financial institutions. Jurisdictions can affirmatively market these resources and information to community groups (such as organizations that serve people with disabilities, people of color, people who speak languages other than English, people who are transgender or nonbinary, tribal members, etc). Arc of Washington staff have provided feedback that family members who care for a household member with developmental disabilities often have to leave the workforce to provide support and are at risk of losing housing. Affordable homeownership could help stabilize these caregiving families.

Goal 3: Increase housing in a variety of types and sizes to meet various family sizes and needs	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
1) Support expansion of accessible housing inventory 2) Support expansion of ADU and other housing types 3) Provide support for accessibility modifications in existing housing	<ul style="list-style-type: none"> - Availability of affordable units in a range of sizes - Land Use and Zoning Laws - Lack of assistance for housing accessibility modifications - Lack of affordable, integrated housing for individuals who need supportive services - Displacement of residents due to economic pressures 	<ul style="list-style-type: none"> - Disproportionate Housing Needs - Disability and Access -Disparities in access to opportunities 	1) Reduce parking requirements to incentivize affordable housing near transit: by mid-2024 2) Explore feasibility of offering impact fee waivers or other incentives (reduced connection fees, etc) for ADUs that meet affordability standards, create accessible units for persons with disabilities, partner with a local nonprofit provider and/or meet other metrics: by end of 2024 3) Create pre-approved ADU plans that include enhanced accessibility design and construction features to increase units accessible to persons with disabilities:	Cities County RHC

			<p>updated ADU plan or list of enhancements by end of 2024</p> <p>4) Ensure adequate mix of bedroom sizes and/or increased accessibility needs are reflected in residential development by adding requirements into affordable housing RFPs: 1-5 housing units per housing project to support enhanced accessibility for residents with disabilities and/or families with children</p> <p>5) Provide referrals and funding to support accessibility modifications in existing units: 20-25 housing units improved each year</p> <p>7) Strive to provide matching funds for developers seeking Housing Trust Fund DD Set Aside funding: 1-3 projects by 2027</p>	
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Discussion: Jurisdictions have made substantial progress to increase affordable housing development and density, including height and density bonuses and impact fee waivers for affordable housing. Cities of Lacey, Olympia, and Tumwater have created pre-approved ADU plan sets for property owners to add an Accessory Dwelling Unit. These plan sets already include several standard accessibility features, such as wider doorways. Enhanced accessibility (such as roll-in showers) could be offered in a pre-approved plan set or list of optional enhancements to increase the inventory of accessible housing units. Increased affordability could be offered by waiving impact fees or offering other incentives in exchange for keeping rents low.

Many neighborhoods with nearby access to transit, jobs, good schools, and other resources have very little vacant land that is suitable for development. Planning and zoning staff have indicated that infill housing types (like ADUs) are a good tool to increase density within neighborhoods near the urban core.

Most adults with developmental disabilities only have income through SSI (annual income under 30%

AMI) and permanent supportive housing models with a behavioral health focus don't provide the type of support services needed. Housing that meets the needs of people with developmental disabilities is described as 'scattered site' housing – larger single-family homes (4-6 people), duplexes, and triplexes. Due to the way residential support services through Development Disabilities Administration are funded, individuals with developmental disabilities often need roommates to share staff and room for staff to provide care. Local jurisdictions could consider providing matching funds and letters of support for non-profit developers who build or manage scattered site housing with State Housing Trust Fund DD Set Aside funding.

Jurisdictions could also evaluate code changes to make it easier to convert unused commercial space for affordable housing.

Goal 4: Reduce barriers to accessing housing (ex: criminal history, credit history)	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Educate tenants and housing providers about how fair housing laws relate to screening process</p> <p>2) Explore ways to partner with and incentivize rental property owners to accept higher barrier tenants</p> <p>3) Explore policy solutions to reduce barriers to accessing housing</p>	<ul style="list-style-type: none"> - Screening criteria and policies - Displacement of residents due to economic pressures 	<ul style="list-style-type: none"> - Disproportionate Housing Needs - Disability and Access 	<p>1) Explore cost to contract with a third-party organization to provide training to landlords and tenants on fair housing and source of income discrimination laws (income to rent ratios) and disparate impact of overly restrictive criminal history policies: by early 2024</p> <p>2) Review models for countywide program to reduce barriers to entry: by end of 2024</p> <p>3) Review additional policy options from other jurisdictions: by end of 2024</p>	<p>Housing Action Team</p> <p>County</p> <p>Cities</p> <p>RHC & Advisory Boards</p>
<p>Discussion: In consultation with community advocates, credit history has been identified as a common barrier to accessing housing (both rental and ownership) for multiple protected class groups. Domestic violence survivors often experience financial abuse, which may include a perpetrator opening credit cards or bank accounts in the survivor's name. Community members with disabilities often have medical debt. Undocumented community members lack a Social Security number, are</p>				

often paid in cash, and have more difficulty establishing credit history. [Reports](#) have indicated people of color more frequently have no credit history or low credit scores. On-time rental, utilities or cell phone payments are not reported to credit bureaus in any positive way.

Social service providers indicated that there is a need for more education about how fair housing laws relate to screening barriers like source of income and criminal history. Criminal history can sometimes be linked to disability and tenants may be able to request reasonable accommodations for a landlord to waive a policy (for example, a prior conviction occurred before a tenant went through treatment and rehabilitation for substance use). Information-sharing of best practices around reasonable accommodations in the screening process may also be helpful. Training about options for addressing previous evictions (order of limited dissemination or other means) could also be helpful for local tenants and service providers. More information about how fair housing laws relate to substance use disorders and reasonable accommodations would also be useful for local service providers.

Cities with rental property registries could explore ways to incentivize property owners to reduce screening barriers or rent at affordable rates. The Housing Action Team’s Rental Housing Workgroup has been in conversation with Housing Connector about their program model to connect higher barrier tenants, tenants with housing vouchers, and/or tenants exiting homelessness to private market landlords. Additional models could be explored to find ways to incentivize property owners to be more flexible in their screening standards, such as offering a risk mitigation fund to match the state landlord mitigation fund programs.

Cities could explore additional local policy options for tenants. For example:

- Minneapolis and Philadelphia passed laws restricting the use of credit history in rental screening
- Seattle restricts use of criminal history in rental screening

Additional policies could be explored that:

- limit when eviction histories can be used (example: when a judgment has been paid off or an order of limited dissemination has been entered)
- limit income to rent ratios (such as not requiring more than proof of 2.5 times the monthly rent)
- do not subject tenants who are using a housing voucher to the same screening criteria regarding credit history, debt owed to a previous landlord or past evictions for nonpayment of rent prior to receiving voucher

Goal 5: Increase Fair Housing and Source of Income Discrimination education, outreach, and enforcement	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)

<p>1) Housing provider education</p> <p>2) Housing consumer education</p> <p>3) Strengthen enforcement of state and federal laws</p>	<ul style="list-style-type: none"> - Private discrimination - Source of income discrimination - Lack of resources for Fair Housing agencies and organizations - Lack of local public Fair Housing outreach and enforcement - Lack of local private fair housing outreach and enforcement 	<ul style="list-style-type: none"> - Discrimination - Segregation - Disparities in access to opportunities - Fair Housing enforcement, outreach capacity and resources - Disability and Access Issues 	<p>1) Create or update web-based and print publications: by mid-2024</p> <p>2) Offer fair housing-related trainings or presentations to landlords, tenants and/or housing advocates (could include trainings outlined in goal 5 below): 1 - 3 per year</p> <p>3) Lobby State Legislature to strengthen and adequately staff the Human Rights Commission: once per year, each Legislative session</p> <p>4) Explore cost to contract with a third-party organization to enforce statewide source of income discrimination protections for Thurston County tenants: by mid-2024</p> <p>5) Explore cost to contract with a third-party organization to provide training on fair housing and source of income discrimination laws: by early 2024</p>	<p>Housing Action Team (Rental Housing Workgroup)</p> <p>County</p> <p>Cities</p>
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Discussion: Survey results reflected a lack of information about how to file a complaint and lack of enforcement of existing protections. Continued complaints resulting from denial of reasonable accommodations also indicates that more education is needed for rental property owners.

The Housing Action Team’s Rental Housing Workgroup is in the process of creating a ‘Successful Renting’ curriculum for Thurston County tenants, which will include information on fair housing laws, reasonable accommodations, and source of income protections.

Cities of Olympia and Tumwater are exploring a landlord registry or permit, and City of Lacey already has a Multifamily Housing registration program. Web-based or in-person trainings could be required or shared with rental property owners in these jurisdictions. Cities could contract with a qualified Fair Housing organization to provide annual training, or refer to linked resources/recorded trainings. Property owners could certify that they attended training, or a list of attendees could be provided by the training organization. Incentives such as access to funding opportunities for property

improvements could be provided in exchange for completing trainings. Cities could provide additional resources and referral information to tenants and rental property owners identified through the registries.

Source of income discrimination was the most reported form of housing discrimination in Thurston County, according to the community survey. Source of income protections are covered under the Residential Landlord-Tenant Act, and there is no government enforcement agency for the Residential Landlord-Tenant Act in Washington State. Many tenants have difficulty navigating the court process to enforce these provisions on their own. A third-party organization could be contracted to enforce these provisions for Thurston County residents, or referral methods could be improved.

While housing conditions were not listed under goals and strategies to increase equity and address housing disparities for members of protected classes, many survey respondents and community advocates have indicated concerns regarding heating costs or insufficient heating, cooling costs or insufficient cooling, and mold. As low-income community members are displaced from housing, many end up in substandard housing units, or under-the-radar rental situations.

Goal 6: Improve environmental health in housing units	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>1) Improve health conditions in housing units and provide energy efficiency upgrades</p> <p>2) Provide education to tenants and landlords regarding environmental hazards like mold and lead paint</p> <p>3) Review and update codes to address mold prevention</p>	<p>- Lack of assistance for housing accessibility modifications</p> <p>- Displacement of residents due to economic pressures</p>	<p>- Disproportionate Housing Needs</p> <p>- Disability and Access</p>	<p>1) Provide funding for rental property owners and low-income homeowners for energy efficiency upgrades that improve air quality/circulation, weatherize units, improve heating and cooling: 20-25 units improved each year</p> <p>2) Provide trainings to landlords and tenants regarding mold treatment and prevention: 1-3 trainings per year</p> <p>3) Review best practices and</p>	<p>Cities</p> <p>County</p> <p>Housing Action Team</p>

			codes adopted in other jurisdictions to address mold prevention and maintenance: by mid-2024	
<p>Discussion: According to advocates and the community survey, mold, high heating costs/insufficient heat and high cooling costs/insufficient cooling are top environmental health concerns in housing. Nearly 60% of survey respondents are concerned by high heating costs or insufficient heat, 48% of respondents are concerned by mold, 45% of respondents are concerned by high cooling costs or insufficient cooling, and 33% of respondents are concerned by air quality/pollution. Around 19% of respondents indicated they had experienced health impacts as a result of these conditions.</p> <p>People with disabilities are often disproportionately impacted by these environmental health issues in their housing, as indicated by a sample of respondents from the community survey:</p> <ul style="list-style-type: none"> • <i>‘Heat (too hot) it causes an increase in seizure activity.’</i> • <i>‘Severe Headaches, severe cough, respiratory and sinus issues. Asthma flare ups.’</i> • <i>‘Gripe continúa por el frío’ (ongoing flu because of the cold)</i> • <i>‘Mold gave me lung infections. Lack of accessible bathroom has caused falls and multiple injuries because I can't access my powerchair.’</i> <p>Thurston County and City of Olympia have used CDBG funding to make repairs or upgrades to housing units to improve health, safety, and energy efficiency, with an agreement to ensure that rental property owners do not increase rents after making property improvements. Jurisdictions can continue funding these programs and partner with local organizations to distribute funding.</p> <p>The Rental Housing Workgroup (part of the Housing Action Team) is planning to include a training on mold in their ‘Successful Renting’ curriculum for Thurston County tenants.</p> <p>Cities that are planning to include unit inspections in their rental housing registry/permit programs could review current codes regarding mold, heating and cooling, make code updates, and provide information about mold treatment and prevention, and funding opportunities for unit repairs. National Healthy Housing standards or other model policies could be reviewed.</p>				