



December 6, 2023
6:30 PM

HOW TO ATTEND

- **In-person:** Council Chambers, Lakewood City Hall, 6000 Main St SW.
- **Virtually:** Online or by phone. Online: <https://us06web.zoom.us/j/86428836136>. Phone: (253) 215-8782 and enter participant ID: 864 2883 6136.
- **Livestream:** YouTube.com/CityofLakewoodWA

Persons requesting special accommodations or language interpreters should call 253-983-7767, as soon as possible in advance of the meeting so that an attempt to provide special accommodations can be made.

PUBLIC COMMENT

Public comments or testimony on public hearings is accepted by mail, email, or by in-person or virtual attendance. Mail comments to Karen Devereaux, Planning Commission Clerk, 6000 Main Street SW Lakewood, WA 98499 or email kdevereaux@cityoflakewood.us. Comments received by noon the day of the meeting will be provided to the commission electronically.

IN-PERSON/VIRTUAL COMMENTS

Those attending in person will be called on by the Chair. Those attending via Zoom should use the “raise hand” function to indicate they wish to speak. Once the Chair calls your name, you will be unmuted. First state your name and city of residence. Each person has 3 minutes. Attendees are allowed to speak during public comment or public hearings only.

WELCOME/CALL TO ORDER

ROLL CALL

APPROVAL OF MEETING MINUTES dated November 15, 2023

AGENDA UPDATES

PUBLIC COMMENT

PUBLIC HEARING

- None

UNFINISHED BUSINESS

- None

NEW BUSINESS

- Review of Initial Draft 2024 Housing Element
- Recognition of Planning Commissioners with expiring terms
 - Don Daniels
 - Brian Parsons
 - Ryan Pearson
 - Paul Wagemann

NEXT STEPS

REPORTS FROM COUNCIL LIAISON, CITY STAFF, COMMISSION MEMBERS

Attachments

- Staff Report: Review of Initial Draft 2024 Housing Element



**Lakewood Planning Commission
November 15, 2023
Meeting Minutes**

MEETING PLACE/DATE

Lakewood City Hall (6000 Main St SW, Lakewood, WA) / November 15, 2023.

WELCOME/CALL TO ORDER

Mr. Don Daniels, Chair called the hybrid ZOOM meeting to order at 6:40 p.m.

ROLL CALL

Planning Commission Members Present: Don Daniels, Chair; Ryan Pearson, Vice-Chair; Robert Estrada, Paul Wagemann, Linn Larsen and Philip Combs

Planning Commission Members Excused: Brian Parsons

Staff: Tiffany Speir, Long Range & Strategic Planning Manager; and Karen Devereaux, Administrative Assistant

Youth Council Liaison: None in attendance

Council Liaison: Councilmember Paul Bocchi (not present)

APPROVAL OF MINUTES

The minutes of the meeting held on November 15, 2023 was approved by voice vote 6-0 as written. M/S/C Larsen/Wagemann.

AGENDA UPDATES

PUBLIC COMMENT

Ms. Sue Carlson, President of Carp Lake Improvement Association, stated she and the 42 property owners around the lake have growing concerns about the levels of water and believe the impervious surfaces from the sidewalk improvements and ground vault installations to manage the surface and ground water all around Lake City are part of the problem.

UNFINISHED BUSINESS

Continued Discussion regarding City Parking and Regulation

The Planning Commission continued its discussion regarding current City parking policy compared to the new parking restrictions adopted by State Legislature per E2SHB 1110 (allowing middle housing in single family areas) and EHB 1337 (allowing accessory dwelling units in all zones that allow single family homes.) Ms. Speir shared

that much of the City's rights-of-way are less than 60' wide and are unable to accommodate any, or additional, heavy on-street parking.

Commissioners discussed their perspectives and initial recommendations regarding parking policy, which are summarized below. These would be revisited and refined into a recommendation to the City Council in late spring 2024 as part of the larger Comprehensive Plan Periodic Review package:

- allow on street parking in residential areas;
- consider adopting street designs in residential areas with less than 60 feet ROW that allow for on street parking and emergency access but are not necessarily the same design as streets with 60+ feet ROW;
- ensure that delivery vehicles can travel through residential areas where on-street parking may be allowed;
- expand shared parking programs and options;
- require public and private investment in residential on-street parking;
- establish funding for residential and commercial on-street parking (e.g., parking permits, parking meters, and/or code enforcement fees); and
- regularly revisit parking policies and regulations (e.g., every 2 years) to ensure they are requiring and allowing the City's desired outcomes.

NEW BUSINESS

Data regarding Climate Change / Greenhouse Gas Emissions in Lakewood

Ms. Tiffany Speir reviewed progress to this point on implementing the 2021 Energy & Climate Change Element (ECCE) of the Comprehensive Plan and the 2022 adopted 3-Year Work Plan to begin implementation of the action items from the ECCE.

Ms. Speir explained state bill E2SHB 1181 that significantly changed the Growth Management Act, adding requirements to plan for climate change resiliency and greenhouse gas (GHG) emission reductions in 2023. As a result, Lakewood would be reopening its ECCE during the 2024 Comprehensive Plan Periodic Review to acknowledge its intent to fully update the element by the 2029 and 2034 deadlines established in E2SHB 1181.

REPORTS

Council Liaison Comments None.

City Staff Comments

Ms. Speir reviewed the upcoming meetings schedule with Commissioners. The last meeting of this year would be December 6, 2023.

Ms. Speir acknowledged that the December meeting would be the last for Commissioner Don Daniels as well as potentially for Commissioner Brian Parsons, Ryan Pearson, and Paul Wagemann.

Commission Members Comments None.

NEXT MEETING would be held as a hybrid in-person/ZOOM meeting on Wednesday, December 6, 2023. The December 20th meeting was cancelled. The Planning Commission would reconvene on January 3, 2024.

ADJOURNMENT Meeting adjourned at 7:26 p.m.

Don Daniels, Chair 12/06/2023

Karen Devereaux, Clerk 12/06/2023



TO: Planning Commission

FROM: Tiffany Speir, Long Range & Strategic Planning Manager

DATE: December 6, 2023

SUBJECT: Initial Draft 2024 Housing Element

ATTACHMENTS: Initial Draft 2024 Housing Element and Audit Tracker
(Attachment A); Housing Element Checklist **(Attachment B)**;
June 2023 Housing Needs Assessment **(Attachment C)**

BACKGROUND

Lakewood is current developing a significantly updated Comprehensive Plan as part of the state-required 2024 Comprehensive Plan Periodic Review (24CPPR) process. A major focus of the 24CPPR, particularly because of recent changes to the Growth Management Act (GMA) by the State Legislature, is housing zoning and regulation.

Over the past 16 months, Lakewood has been engaged in public outreach and drafting edits to the current Comprehensive Plan regarding housing. Enough of the initial work to update the Housing Element has been completed that a draft of the new element is available for review.

This initial draft Housing Element is by no means complete. It is still subject to numerous public outreach efforts as well as continued drafting by the City before it can be considered ready for formal legislative review by the Planning Commission. It is presented now to familiarize the Commission with how the City will be synthesizing public comments, informal Planning Commission direction, state law review, and regional policy review into what will eventually be a new 2024 Comprehensive Plan and Development Regulation code for Lakewood.

The documents attached to this memorandum include:

- November 2023 Initial draft 2024 Housing Element and Audit Tracker **(Attachment A)**
- Housing Element Checklist **(Attachment B)**
- June 2023 Housing Needs Assessment **(Attachment C)**

Housing, population, and economic development demographic data based on the 2020 US Census, the most recent American Community Survey, Puget Sound Regional Council, WA Department of Commerce, WA State Office of Financial Management, and other sources will be incorporated into an Appendix to the 2024 Comprehensive Plan.

Updated maps of the City's future housing patterns, land use, zoning, centers of municipal importance, Regional Urban Growth Center, utilities, parks, and more will be incorporated in to the 2024 Comprehensive Plan and its Appendices as well.

ATTACHMENT A

6 Housing

6.1 Introduction

This Comprehensive Plan Element sets the stage for a vibrant, sustainable, family-oriented community through the balanced allocation of land for a variety of housing types affordable to all household incomes. It accommodates growth. Housing and retail or commercial development may be interwoven in some areas where they would mutually benefit one another; elsewhere, different land uses may remain discrete to meet other goals.

The Housing Element includes nine (9) goals and 61 policies. These goals and policies will be realized through the City's implementation strategies, including: strategic infrastructure improvements; future sub-area planning; technical area planning; design and development regulations; the process of development review; and other such methods.

6.2 Background

Lakewood possesses a diverse housing stock with a wide range of unit types and prices, most of which was constructed prior to incorporation in 1996. The inventory includes large residential estate properties, single-family homes of all sizes, some townhouses, semi-attached houses, low- and mid-rise apartments, and high density apartments. The Housing Element is based on an assessment of Lakewood's current demographics and existing housing stock. It also is consistent with: the State's Growth Management Act (GMA); the Puget Sound Regional Council (PSRC) regional planning policies (MPPs) and Regional Growth Strategy included within VISION 2050; the Pierce County Countywide Planning Policies (CPPs); and other elements of the Comprehensive Plan. The Housing Element considers how Lakewood will accommodate its share of projected regional growth and how it will provide housing for all economic segments of its population. It provides a framework for addressing the housing needs of current and future residents. Finally, it serves as a guide for protecting and enhancing the quality of life in residential areas.

6.3 Goals and Policies

LU-1 Promote a supply of housing that supports all economic segments of the population.

LU-1.1 Plan to the 2020–2044 housing target allocations by household income for Lakewood adopted by Pierce County:

- 30% AMI or less: 1,367 units,
- 30–50% AMI: 1,739 units,
- 50–80% AMI: 1,375 units,
- 80–100% AMI: 592 units, and
- 100–120% AMI: 536 units.

LU-1.2 Plan to the 2020–2044 County target allocations for an additional 1,212 units of permanent supportive housing affordable to households at 0–30% AMI.

LU-1.3 Plan to the 2020–2044 County target allocations for 574 spaces in emergency shelter.

LU-1.4 Encourage housing that meets the needs of different sizes and types of households in the community.

LU-1.5 Plan and accommodate the development and preservation of other housing to minimize displacement.

(LU-2) Encourage market-rate housing that can meet the needs of households across the city.

LU-2.1 Encourage affordable home ownership opportunities for low- and moderate-income households, especially first-time homebuyers.

LU-2.2 Encourage middle-housing options that are affordable to low- and moderate-income households.

LU-2.3 Provide technical assistance for redevelopment in key areas, including Lake City, Lakeview, Springbrook, Tillicum the City's residential target areas (RTAs), and senior overlay districts.

LU-2.4 Maintain relationships with local and regional housing developers.

LU-2.5 Develop and manage an updated inventory of land available for housing development.

LU-2.6 Pursue partnerships with developers to support ongoing housing development in Lakewood.

LU-2.7 Provide flexibility in development regulations to promote innovative housing types that help meet city goals.

(LU-3) Encourage the preservation and expansion of housing options for lower-income residents.

LU-3.1 Maintain and develop partnerships to create and manage affordable housing with nonprofit agencies, the Pierce County Housing Authority, and other organizations.

LU-3.2 Maintain a surplus lands policy that supports development of affordable housing by private, nonprofit, and government organizations.

LU-3.3 Use federal grants and other funds to support affordable housing goals.

LU-3.4 Work with Pierce County, other cities in the region, and regional organizations to address housing issues.

LU-3.5 Where possible, support the preservation and improvement of existing subsidized housing and affordable market-rate housing.

LU-3.6 Maintain a need-based program for housing rehabilitation grants to homeowners.

(LU-4) Support a variety of housing options to meet different housing needs.

LU-4.1 Support flexible site designs and innovative housing types to help meet housing needs in the community.

LU-4.2 Support high-quality building design as part of projects where innovative site or subdivision designs are permitted.

LU-4.3 Encourage the construction of cottages and cottage housing developments with site design incentives.

LU-4.4 Support accessory dwelling units to encourage affordable housing options and alternatives for aging-in-place.

LU-4.5 Allow Planned Development District development with higher residential densities and site design flexibility in exchange for public benefits from innovative site design, conservation of natural land features, protection of critical area buffers, the use of low-impact development techniques, conservation of energy, and efficient use of open space.

LU-5 Promote housing options for people with special needs.

LU-5.1 Allow special needs housing throughout the city and encourage a distribution of this housing to prevent overconcentration.

LU-5.2 Support the development and management of housing for special needs populations operated by social service organizations.

LU-5.3 Support accessibility of housing by people with mobility challenges through universal design in residential construction and retrofitting of homes.

LU-5.4 Support special needs housing by considering and including their needs in neighborhood and transportation planning.

LU-5.5 Help to preserve special needs housing options in places where they are being lost, especially in locations that are well served by shopping, services, and other facilities needed by the residents

LU-5.6 Encourage the availability of special needs housing options throughout the city.

LU-5.7 Encourage positive relationships between special needs housing operators and neighbors.

LU-5.8 Allow special needs housing in all residential areas and in certain non-residential areas as appropriate.

LU-5.9 Prevent additional requirements on special needs housing from being imposed through development regulations.

LU-5.10 Encourage accessory dwelling units (ADUs) as an option for supportive living and aging-in-place.

LU-5.11 Provide density bonuses and modified height restrictions to encourage the development of special needs housing.

LU-5.12 Encourage the concentration of senior housing proximate to shopping and services.

(LU-6) Ensure that the City provides sufficient options for emergency housing needs.

LU-6.1 Maintain sufficient land capacity for the development of emergency housing.

LU-6.2 Allow permanent supportive housing and transitional housing in all residential areas and certain non-residential areas as appropriate.

LU-6.3 Coordinate ancillary services related to homelessness and domestic violence with emergency shelters.

LU-6.4 Partner with appropriate local and regional agencies to implement effective policies and programs to support people facing homelessness; and domestic violence.

(LU-7) Support a high quality of life for Lakewood's residents.

LU-7.1 Encourage improvements in property maintenance and building standards in residential neighborhoods to improve neighborhood quality of life.

LU-7.2 Maintain targeted outreach efforts such as the crime-free rental housing program to improve neighborhood safety.

LU-7.3 Provide financial assistance to low-income residents to assist them in staying in their homes.

LU-7.4 Coordinate supporting services for displaced residents to assist them in finding other housing options.

LU-7.5 Conduct periodic surveys of housing conditions in the community.

LU-7.6 Maintain need-based housing rehabilitation and repair programs.

LU-7.7 Encourage revitalization and rehabilitation of existing apartment complexes in the city to maintain affordable and family-sized housing options.

LU-7.8 Ensure multi-family housing supports residents with access to public transportation, employment, services, open space, and other supporting amenities.

LU-7.9 Encourage a high-quality pedestrian environment in neighborhoods, and require on-site amenities such as walkways, trails, and bike paths to be connected to adjacent public facilities.

LU-7.10 Promote community identity, pride, and involvement in neighborhoods through the City's neighborhood program and other activities.

LU-7.11 Use design standards to protect privacy, provide buffers to address structures of different scales, and promote investments in high-quality urban environments.

LU-7.12 Development standards should encourage design at consistent scales in neighborhoods.

LU-7.13 New subdivisions should provide motorized and non-motorized transportation connections to adjoining neighborhoods unless physical features of the site prevent feasible connections.

LU-7.14 Allow flexibility with development, design, and landscaping standards for residential properties located on major arterials to mitigate impacts from adjacent traffic.

LU-7.15 Allow home-based businesses in residential neighborhoods that do not conflict with residential uses.

(LU-8) Increase homeownership in the City.

LU-8.1 Provide flexibility with development standards for housing types that can meet the demand for homeownership in the community.

LU-8.2 Support first-time homebuyer programs in the community.

(LU-9) Mitigate housing displacement and the loss of affordable housing units from development in the city.

LU-9.1 Provide a regular report to the City Council on the loss of affordable housing due to demolition or conversion.

LU-9.2 Identify and address affordable market-rate and subsidized housing resources that may be at risk due to redevelopment pressures or deteriorating housing conditions.

LU-9.3 Require financial and relocation assistance for people displaced as a result of construction and development projects using federal funds.

LU-9.4 Require replacement of low- and moderate-income housing units that are demolished or converted to another use in connection with projects supported by CDBG funds.

LU-9.5 Apply CDBG funds as applicable for relocation payments and other relocation assistance.

Housing Audit

Original Goal/Policy	Rationale for Change	Policy Edits
<p>LU-2 Ensure that housing exists for all economic segments of Lakewood's population.</p>	<ul style="list-style-type: none"> This should be refined to focus on the housing targets by income category. 	<p>LU-2 Ensure that Promote a supply of housing exists for that supports all economic segments of Lakewood's the population.</p>
<p>[NEW]</p>	<ul style="list-style-type: none"> This adds the housing targets by income level. 	<p>LU-2.X Plan to the 2020–2044 housing target allocations by household income for Lakewood adopted by Pierce County:</p> <ul style="list-style-type: none"> 30% AMI or less: 1,367 units, 30–50% AMI: 1,739 units, 50–80% AMI: 1,375 units, 80–100% AMI: 592 units, and 100–120% AMI: 536 units.
<p>[NEW]</p>	<ul style="list-style-type: none"> Add PSH targets. 	<p>LU-2.X Plan to the 2020–2044 County target allocations for an additional 1,212 units of permanent supportive housing affordable to households at 0–30% AMI.</p>
<p>[NEW]</p>	<ul style="list-style-type: none"> Add emergency shelter targets. 	<p>LU-2.X Plan to the 2020–2044 County target allocations for 574 spaces in emergency shelter.</p>
<p>[NEW]</p>	<ul style="list-style-type: none"> Identify the need for family housing. 	<p>LU-2.X Encourage housing that meets the needs of different sizes and types of households in the community.</p>

Original Goal/Policy	Rationale for Change	Policy Edits
[NEW]	<ul style="list-style-type: none"> Recent changes from HB 1220 require anti-displacement policies. 	LU-2.X Plan and accommodate the development and preservation of other housing to minimize displacement.
(LU-2) Increase housing opportunities for upper income households.	<ul style="list-style-type: none"> This should be integrated into targets by household income. 	[REMOVED]
LU-2.1 Target ten (10) percent of new housing units annually through 2030 to be affordable to upper income households that earn over 120 percent of county median income.	<ul style="list-style-type: none"> This should be accommodated in the broader housing targets by household income. (Note that the new target is higher.) 	[REMOVED]
LU-2.2 Encourage the construction of luxury condominium adjacent to the lakes.	<ul style="list-style-type: none"> This does not appear to be necessary for market-rate developments. 	[REMOVED]
LU-2.3 Support site plans and subdivisions incorporating amenity features such as private recreation facilities, e.g., pools, tennis courts, and private parks to serve luxury developments.	<ul style="list-style-type: none"> This does not appear to be necessary for market-rate developments. 	[REMOVED]
LU-2.4 Increase public awareness of upper income housing opportunities in Lakewood.	<ul style="list-style-type: none"> This does not appear to be necessary for market-rate developments. 	[REMOVED]
(LU-2) Encourage the private sector to provide market rate housing for the widest potential range of income groups including middle income households.	<ul style="list-style-type: none"> This has been reframed to provide a focus on market-rate private development meeting housing goals. 	(LU-2) Encourage the private sector to provide market-rate housing that can meet the needs of households across the city for the widest potential range of income groups including middle income households.
LU-2.5 Target sixty-five (65) percent of new housing units annually through 2030 to be affordable to middle income households that earn 80 to 120 percent of county median income.	<ul style="list-style-type: none"> This is not aligned with the requirements from the state on distribution of housing affordability and has been replaced. 	[REMOVED]
LU-2.6 Encourage home ownership opportunities affordable to moderate income households.	<ul style="list-style-type: none"> Refined / clarified. Note that this incorporates some considerations from LU-4.30. 	LU-2.6 Encourage affordable home ownership opportunities affordable to for low- and moderate-income households, especially first-time homebuyers.
LU-2.7 Encourage the construction of townhouse, condominium, and rental units affordable to moderate income households in residential and mixed-use developments and redevelopments.	<ul style="list-style-type: none"> Refined to consider middle housing options and simplified. 	LU-2.7 Encourage the construction of townhouse, condominium, and rental units middle-housing options that are affordable to low- and moderate-income households in residential and mixed-use developments and redevelopments.
LU-2.8 Continue to provide technical assistance for redevelopment of land in Lake City, Lakeview, Springbrook, Tillicum, and lands located in the City's residential target areas (RTAs) and senior overlay.	<ul style="list-style-type: none"> Refined / clarified. 	LU-2.8 Continue to Provide technical assistance for redevelopment of land in in key areas, including Lake City, Lakeview, Springbrook, Tillicum, and lands located in the City's residential target areas (RTAs) and senior overlay districts.

Original Goal/Policy		Rationale for Change	Policy Edits
LU-2.9	Market Lakewood to housing developers.	<ul style="list-style-type: none"> Refined to focus on broader relationship versus marketing. 	LU-2.9 Market Lakewood to Maintain relationships with local and regional housing developers.
LU-2.10	Maintain an updated inventory of land available for housing development.	<ul style="list-style-type: none"> Refined / clarified. This may also require a discussion regarding whether this inventory is functional and practical. 	LU-2.10 Maintain Develop and manage an updated inventory of land available for housing development.
LU-2.11	Pursue public-private partnerships to provide for moderate-income housing.	<ul style="list-style-type: none"> The purpose of this policy is unclear as it is uncertain how a public-private partnership would necessarily work in this case. Identifying a pol 	LU-2.11 Pursue public-private partnerships with developers to provide for moderate-income support ongoing housing development in Lakewood.
LU-2.12	Disperse middle-income housing in all areas of the City.	<ul style="list-style-type: none"> This should be consolidated and accommodated with the housing targets for all income categories. 	LU-2.12 Disperse middle-income housing in all areas of the City.
LU-2.13	Ensure that a sufficient amount of land in the City is zoned to allow attached housing and innovative housing types.	<ul style="list-style-type: none"> This may need to be more expansive than just zoning, and acknowledge the need for additional development flexibility. 	LU-2.13 Ensure that a sufficient amount of land in the City is zoned to allow attached housing and Provide flexibility in development regulations to promote innovative housing types that help meet city goals.
(LU-2)	Provide a fair share of low-and very-low income housing in the future.	<ul style="list-style-type: none"> This should be consolidated into a discussion of low-income and special housing below. 	[REMOVED]
LU-2.14	Maintain a sufficient land supply and adequate zoning within the City to accommodate 25 percent of the City's projected net household growth for those making less than or equal to 80 percent of county median income.	<ul style="list-style-type: none"> This is not aligned with the requirements from the state on distribution of housing affordability and has been replaced. 	[REMOVED]
(LU-2)	Encourage the private sector to provide market rate housing for the widest potential range of income groups including middle income households.	<ul style="list-style-type: none"> This appears to be a little mixed and includes a lot of non-market, non-private providers. This has been reoriented to focusing on lower-income housing. 	(LU-2) Encourage the private sector to provide market rate housing for the widest potential range of income groups including middle income households. preservation and expansion of housing options for lower-income residents.
LU-2.15	Establish the following sub-targets for affordability to households earning 50 percent or less of county median income, to be counted to toward the 25 percent target: <ul style="list-style-type: none"> Fifteen (15) percent of new housing units constructed in the City; A number equal to five (5) percent of new housing units, to be met by existing units that are given long-term affordability; and A number equal to five (5) percent of new housing units, to be met by existing units that are purchased by low-income households through home-buyer assistance programs. 	<ul style="list-style-type: none"> This is not aligned with the requirements from the state on distribution of housing affordability and has been replaced. 	[REMOVED]

Original Goal/Policy	Rationale for Change	Policy Edits
<p>LU-2.16 Pursue public-private partnerships to provide and manage affordable housing.</p>	<ul style="list-style-type: none"> This can be expanded to encompass some of the bullet points below. 	<p>LU-2.16 Pursue public-private Maintain and develop partnerships to provide create and manage affordable housing with nonprofit agencies, the Pierce County Housing Authority, and other organizations.</p>
<ul style="list-style-type: none"> Support non-profit agencies that construct and manage projects within the City; 	<ul style="list-style-type: none"> Consolidated. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Support the role of the Pierce County Housing Authority in providing additional housing; 	<ul style="list-style-type: none"> Consolidated. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Before City surplus property is sold, evaluate its suitability for development of affordable housing; and 	<ul style="list-style-type: none"> Rewrite as a separate policy, as this is slightly different than other elements here. 	<p>LU-X.X Maintain a surplus lands policy that supports Before City surplus property is sold, evaluate its suitability for development of affordable housing by private, nonprofit, and government organizations.; and</p>
<ul style="list-style-type: none"> Use federal funds including Community Development Block Grants and HOME funds to support low and moderate income affordable housing. 	<ul style="list-style-type: none"> This should be made more general, and expanded to consider more than just low- and moderate-income housing. 	<p>LU-X.X Use federal grants and other funds including Community Development Block Grants and HOME funds to support low and moderate income affordable housing goals.</p>
<p>LU-2.17 Work with other Pierce County cities to address regional housing issues.</p>	<ul style="list-style-type: none"> This should be expanded to include consideration of SHHA³P and other organizations. 	<p>LU-2.17 Work with other Pierce County, other cities in the region, and regional organizations to address regional housing issues.</p>
<p>LU-2.18 Disperse low-income housing in all mixed-use and multi-family land use designations that allow attached dwelling units.</p>	<ul style="list-style-type: none"> This should be consolidated and accommodated with the housing targets for all income categories. 	<p>LU-2.18 Disperse low-income housing in all mixed-use and multi-family land use designations that allow attached dwelling units;</p>
<p>LU-2.19 Except for parts of the Woodbrook neighborhood which is slated to be redeveloped as Industrial, and existing mobile home parks located in commercially designated zones or in Air Corridors, encourage preservation, maintenance, and improvements to existing subsidized housing and to market- rate housing that is affordable to low and moderate income households.</p>	<ul style="list-style-type: none"> This should be simplified for clarity. Additionally, the preservation of manufactured home parks should be separated to highlight that different approaches would be necessary. (Note that this is included in a different policy.) 	<p>LU-2.19 Except for parts of the Woodbrook neighborhood which is slated to be redeveloped as Industrial, and existing mobile home parks located in commercially designated zones or in Air Corridors; Where possible, encourage preservation, maintenance, and improvements to support the preservation and improvement of existing subsidized housing and to affordable market-rate housing that is affordable to low and moderate income households.</p>
<p>LU-2.20 Reduce existing housing need, defined as the number of existing households that earn 80 percent of county median income, and are paying more than 30 percent of their income for housing, or live in inadequate housing by increasing housing supply for all economic segments of the community.</p>	<ul style="list-style-type: none"> This should be removed and consolidated with the housing targets by income category. 	<p>[REMOVED]</p>

Original Goal/Policy	Rationale for Change	Policy Edits
<ul style="list-style-type: none"> ▪ Create opportunities for higher income households to vacate existing lower cost units, by creating a variety of market rate detached and attached housing types; and 	<ul style="list-style-type: none"> ▪ This should be removed and consolidated with the housing targets by income category. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> ▪ Prioritize applications to the City for housing rehabilitation grants to homeowners earning 80 percent of county median income or below based on the greatest degree of existing need. With the exception of emergencies, priority should be given to households occupying conventional housing. 	<ul style="list-style-type: none"> ▪ This should be simplified. 	<p>LU-2.20 Prioritize applications to the City Maintain a need-based program for housing rehabilitation grants to homeowners earning 80 percent of county median income or below based on the greatest degree of existing need. With the exception of emergencies, priority should be given to households occupying conventional housing.</p>
<p>(LU-2) Provide a variety of housing types and revised regulatory measures which increase housing affordability.</p>	<ul style="list-style-type: none"> ▪ This can be simplified and broadened to make the focus about meeting the needs for different housing types. 	<p>(LU-2) Provide Support a variety of housing types and revised regulatory measures which increase housing affordability options to meet different housing needs.</p>
<p>LU-2.21 Support projects including planned development districts, subdivisions and site plans incorporating innovative lot and housing types, clustered detached houses, clustered semi-attached houses and a variety of lots and housing types within a site.</p>	<ul style="list-style-type: none"> ▪ This should be simplified. 	<p>LU-2.21 Support projects including flexible site designs and planned development districts; subdivisions and site plans incorporating innovative lot and housing types to help meet housing needs in the community; clustered detached houses, clustered semi-attached houses and a variety of lots and housing types within a site.</p>
<p>LU-2.22 Support projects that incorporate quality features, such as additional window details, consistent architectural features on all facades, above average roofing and siding entry porches or trellises where innovative site or subdivision designs are permitted.</p>	<ul style="list-style-type: none"> ▪ This should be simplified. 	<p>LU-2.22 Support projects that incorporate high-quality features building design; such as additional window details, consistent architectural features on all facades, above average roofing and siding entry porches or trellises where as part of projects where innovative site or subdivision designs are permitted.</p>
<p>LU-2.23 Encourage the construction of cottages on small lots through incentives such as density bonuses.</p>	<ul style="list-style-type: none"> ▪ Combine with the following policy. 	<p>LU-2.23 Encourage the construction of cottages on small lots through incentives such as density bonuses and cottage housing developments with site design incentives.</p>

Original Goal/Policy	Rationale for Change	Policy Edits
<p>LU-2.24 Support standards that allow cottage housing developments with the following features in residential zones, provided the cottages are limited by size or bulk:</p> <ul style="list-style-type: none"> Allow increased density over the zoned density; Allow reduced minimum lot size, lot dimensions, and setbacks; Allow both clustered and non-clustered cottages; Allowing clustered parking; and Base the required number of parking spaces on unit size, or number of bedrooms. 	<ul style="list-style-type: none"> Combine with LU-2.23. 	<p>[REMOVED]</p>
<p>LU-2.25 Support accessory dwelling units as strategies for providing a variety of housing types and as a strategy for providing affordable housing, with the following criteria:</p> <ul style="list-style-type: none"> Ensure owner occupancy of either the primary or secondary unit; Allow both attached and detached accessory dwelling units and detached carriage units, at a maximum of one per single-family house, exempt from the maximum density requirement of the applicable zone; Require an additional parking space for each accessory dwelling unit, with the ability to waive this requirement for extenuating circumstances; and Allow a variety of entry locations and treatments while ensuring compatibility with existing neighborhoods. 	<ul style="list-style-type: none"> This should be simplified. 	<p>LU-2.25 Support accessory dwelling units to encourage affordable housing options and alternatives for aging-in-place. as strategies for providing a variety of housing types and as a strategy for providing affordable housing, with the following criteria:</p> <ul style="list-style-type: none"> Ensure owner occupancy of either the primary or secondary unit; Allow both attached and detached accessory dwelling units and detached carriage units, at a maximum of one per single-family house, exempt from the maximum density requirement of the applicable zone; Require an additional parking space for each accessory dwelling unit, with the ability to waive this requirement for extenuating circumstances; and Allow a variety of entry locations and treatments while ensuring compatibility with existing neighborhoods;
<p>LU-2.26 Encourage Planned Development District development with higher residential densities provided this type of development incorporates innovative site design, conservation of natural land features, protection of critical area buffers, the use of low-impact development techniques, conservation of energy, and efficient use of open space.</p>	<ul style="list-style-type: none"> This should be simplified. 	<p>LU-2.26 Encourage-Allow Planned Development District development with higher residential densities and site design flexibility provided this type of development incorporates in exchange for public benefits from innovative site design, conservation of natural land features, protection of critical area buffers, the use of low-impact development techniques, conservation of energy, and efficient use of open space.</p>

Original Goal/Policy	Rationale for Change	Policy Edits
<p>LU-3 Ensure that there are housing opportunities for people with special needs, such as seniors, people with disabilities, and the homeless.</p>	<ul style="list-style-type: none"> This should be simplified, and considerations of emergency housing should be separated. 	<p>LU-3 Ensure that there are housing opportunities Promote housing options for people with special needs, such as seniors, people with disabilities, and the homeless.</p>
<p>(LU-3) Increase the supply of special needs housing.</p>	<ul style="list-style-type: none"> This appears redundant. 	<p>(LU-3) Increase the supply of special needs housing;</p>
<p>LU-3.1 Periodically review the City's land use and development regulations and remove any regulatory barriers to locating special needs housing and emergency and transitional housing throughout the City as required by the federal Fair Housing Act, to avoid overconcentration, and to ensure uniform distribution throughout all residential and mixed-use zones.</p>	<ul style="list-style-type: none"> This is appropriate under state requirements but should be condensed and simplified. Note that this should focus on special needs housing and emergency/transitional housing should be discussed in a later goal. 	<p>LU-3.1 Periodically review the City's land use and development regulations and remove any regulatory barriers to locating. Allow special needs housing and emergency and transitional housing throughout the City-city and encourage a distribution of this housing to prevent overconcentration. as required by the federal Fair Housing Act, to avoid overconcentration, and to ensure uniform distribution throughout all residential and mixed-use zones.</p>
<p>LU-3.2 Support the housing programs of social service organizations that provide opportunities for special needs populations.</p>	<ul style="list-style-type: none"> Edited for clarity. 	<p>LU-3.2 Support the development and management of housing programs of social service organizations that provide opportunities for special needs populations operated by social service organizations.</p>
<p>LU-3.3 Support opportunities for older adults and people with disabilities to remain in the community as their housing needs change, by encouraging universal design in residential construction, or through the retrofitting of homes.</p>	<ul style="list-style-type: none"> Simplify this text. 	<p>LU-3.3 Support accessibility of housing by people with mobility challenges through opportunities for older adults and people with disabilities to remain in the community as their housing needs change, by encouraging universal design in residential construction, or through the and retrofitting of homes.</p>
<p>LU-3.4 Support the establishment and operation of emergency shelters.</p>	<ul style="list-style-type: none"> This has been removed in favor of a consolidated section with the housing targets. 	<p>[REMOVED]</p>
<p>LU-3.5 Support proposals for special needs housing that:</p>	<ul style="list-style-type: none"> Special needs housing cannot be restricted; this may be better to rewrite in a way that is flipped where the city is encouraged to support special needs housing through planning. Consolidate and simplify. 	<p>LU-3.5 Support proposals for special needs housing that: by considering and including their needs in neighborhood and transportation planning.</p>
<ul style="list-style-type: none"> Offer a high level of access to shopping, services, and other facilities needed by the residents; 	<ul style="list-style-type: none"> Consolidate and simplify. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Demonstrate that it meets the transportation needs of residents; 	<ul style="list-style-type: none"> Consolidate and simplify. 	<p>[REMOVED]</p>

Original Goal/Policy	Rationale for Change	Policy Edits
<ul style="list-style-type: none"> Helps to preserve low-income and special needs housing opportunities in a neighborhood where those opportunities are being lost; and 	<ul style="list-style-type: none"> This is an important element of policy that should be maintained. 	LU-X.X Helps to preserve low-income and special needs housing opportunities in a neighborhood places where those opportunities they are being lost; and , especially in locations that are well served by shopping, services, and other facilities needed by the residents
<ul style="list-style-type: none"> Disperse special needs housing throughout the residential areas of the City. 	<ul style="list-style-type: none"> Change the wording to be more positive. 	LU-X.X Disperse Encourage the availability of special needs housing options throughout the residential areas of the City.
LU-3.6 Support development proposals by sponsors of assisted housing when applicants document efforts to establish and maintain positive relationships with neighbors.	<ul style="list-style-type: none"> Reword this to ensure that this does not suggest that this is required more for special needs housing than other types. 	LU-3.6 Support development proposals by sponsors of assisted housing when applicants document efforts to establish and maintain Encourage positive relationships with between special needs housing operators and neighbors.
LU-3.7 Allow a broad range of housing to accommodate persons with special needs (such as neighborhood-scale congregate care, group or assisted living facilities, or transitional housing) in all residential areas and in certain appropriate non-residential areas.	<ul style="list-style-type: none"> This is good but should be simplified. 	LU-3.7 Allow a broad range of special needs housing to accommodate persons with special needs (such as neighborhood-scale congregate care, group or assisted living facilities, or transitional housing) in all residential areas and in certain appropriate non-residential areas as appropriate.
[NEW]	<ul style="list-style-type: none"> Provide for fair treatment of housing as per state statute. 	LU-X.X Prevent additional requirements on special needs housing from being imposed through development regulations.
LU-3.8 Continue allowing accessory dwelling units (ADUs) to assist people in remaining independent or in retaining a single-family lifestyle on a limited income, subject to specific regulatory standards.	<ul style="list-style-type: none"> This is slightly redundant with LU-2.25 above, but should probably remain (and be edited). 	LU-3.8 Continue allowing Encourage accessory dwelling units (ADUs) to assist people in remaining independent or in retaining a single-family lifestyle on a limited income, subject to specific regulatory standards as an option for supportive living and aging-in-place.
LU-3.9 Establish an administrative review process to enable detached ADUs in order to expand ADU capacity.	<ul style="list-style-type: none"> This may not be useful in this section and may be redundant with other ADU policies earlier. 	[REMOVED]
LU-3.10: To support mobility for those with special needs, locate special needs housing in areas accessible to public transportation.	<ul style="list-style-type: none"> This is something that the City cannot really require under state law. 	[REMOVED]
LU-3.11: Utilize design standards to make special needs housing compatible with the character of the surrounding area.	<ul style="list-style-type: none"> This is something that the City cannot really require under state law. 	[REMOVED]

Original Goal/Policy	Rationale for Change	Policy Edits
LU-3.12: Where appropriate, provide density bonuses and modified height restrictions to encourage the development of senior and disabled housing.	<ul style="list-style-type: none"> Edit for clarity and brevity. 	LU-3.12 Where appropriate, provide Provide density bonuses and modified height restrictions to encourage the development of senior and disabled special needs housing.
LU-3.13 Continue to promulgate the senior housing overlay district created under an earlier version of the Comprehensive Plan in order to encourage the concentration of senior housing proximate to shopping and services.	<ul style="list-style-type: none"> Consolidate and simplify. 	LU-3.13 Continue to promulgate the senior housing overlay district created under an earlier version of the Comprehensive Plan in order to encourage Encourage the concentration of senior housing proximate to shopping and services.
[NEW]	<ul style="list-style-type: none"> Separate the policies for emergency housing and permanent supportive housing. 	LU-X Ensure that the City provides sufficient options for emergency housing needs.
[NEW]	<ul style="list-style-type: none"> Add provisions to clarify the City's obligations under state law. 	LU-X Maintain sufficient land capacity for the development of emergency housing.
[NEW]	<ul style="list-style-type: none"> Add provisions to clarify the City's obligations under state law. 	LU-X Allow permanent supportive housing and transitional housing in all residential areas and certain non-residential areas as appropriate.
LU-3.14 Support the provision of emergency shelters and ancillary services that address homelessness and domestic violence and intervene with those at risk.	<ul style="list-style-type: none"> Separate these considerations – note the difference above. 	LU-3.14 Support the provision of emergency shelters and Coordinate ancillary services that address related to homelessness and domestic violence and intervene with those at risk with emergency shelters.
LU-3.15 Maintain cooperative working relationships with appropriate local and regional agencies to develop and implement policies and programs relating to homelessness, domestic violence, and those at risk.	<ul style="list-style-type: none"> Consolidate and simplify. 	LU-3.15 Maintain cooperative working relationships Partner with appropriate local and regional agencies to develop and implement effective policies and programs relating to support people facing homelessness, and domestic violence, and those at risk
LU-4 Maintain, protect, and enhance the quality of life of Lakewood's residents.	<ul style="list-style-type: none"> Edits for clarity. 	LU-4 Maintain, protect, and enhance the Support a high quality of life of for Lakewood's residents.
(LU-4) Preserve and protect the existing housing stock.	<ul style="list-style-type: none"> Remove, as this is not really a strong goal to support quality of life. 	[REMOVED]
LU-4.1 Preserve existing housing stock where residential uses conform to zoning requirements.	<ul style="list-style-type: none"> This appears to be overly vague; preserving the existing housing stock appears to be a disincentive for infill/intensification. 	[REMOVED]

Original Goal/Policy	Rationale for Change	Policy Edits
LU-4.2 High-density housing projects, with the exception of senior housing, will not be permitted in existing single-family residential neighborhoods. More moderate densities such as planned development districts and cottage housing will be considered.	<ul style="list-style-type: none"> This policy is unclear, as the land use map should be defining where these uses would go. 	[REMOVED]
LU-4.3 Target code enforcement to correct health and safety violations.	<ul style="list-style-type: none"> The reason for this policy is unclear. Codes are intended for health and safety violations and shouldn't require a Comprehensive Plan policy to enforce. 	[REMOVED]
LU-4.4 Continue Lakewood's active enforcement of codes aimed at improving property maintenance and building standards in residential neighborhoods to bolster neighborhood quality and the overall quality of life.	<ul style="list-style-type: none"> Codes should not require a policy to enforce; this is rewritten to highlight potential City actions. 	LU-4.4 Continue Lakewood's active enforcement of codes aimed at improving Encourage improvements in property maintenance and building standards in residential neighborhoods to bolster improve neighborhood quality and the overall quality of life.
LU-4.5 Continue targeted efforts such as the crime-free rental housing program and seek out a variety of funding sources for this and other such outreach programs.	<ul style="list-style-type: none"> Edit for clarity. 	LU-4.5 Continue Maintain targeted outreach efforts such as the crime-free rental housing program and seek out a variety of funding sources for this and other such outreach programs to improve neighborhood safety.
LU-4.6 Develop programs to provide financial assistance to low-income residents to assist them in maintaining their homes.	<ul style="list-style-type: none"> Edit for clarity and brevity. This may be consolidated with other financial assistance policies. 	LU-4.6 Develop programs to provide Provide financial assistance to low-income residents to assist them in maintaining staying in their homes.
Lu-4.7 Where public actions such as targeted crime reduction programs result in the unexpected displacement of people from their housing, coordinate the availability of social services to assist them in finding other shelter.	<ul style="list-style-type: none"> This is a very specific policy that may be combined with others regarding displacement. 	Lu-4.7 Where public actions such as targeted crime reduction programs result in the unexpected displacement of people from their housing, coordinate the availability of social Coordinate supporting services for displaced residents to assist them in finding other shelter housing options.
LU-4.8 Subject to funding availability, conduct periodic surveys of housing conditions and fund programs, including housing rehabilitation, to ensure that older neighborhoods are not allowed to deteriorate.	<ul style="list-style-type: none"> Edit for clarity and brevity. 	LU-4.8 Subject to funding availability, conduct Conduct periodic surveys of housing conditions in the community, and fund programs, including housing rehabilitation, to ensure that older neighborhoods are not allowed to deteriorate.
LU-4.9 Identify areas in the City for priority funding for rehabilitation by non-profit housing sponsors.	<ul style="list-style-type: none"> This is unclear and should be removed. 	[REMOVED]

Original Goal/Policy	Rationale for Change	Policy Edits
LU-4.10 Continue City funding of housing rehabilitation and repair.	<ul style="list-style-type: none"> Edit for clarity and brevity. This may be combined with comparable policies. 	LU-4.10 Continue City funding of Maintain need-based housing rehabilitation and repair programs.
(LU-4) Improve the quality of multifamily housing choices.	<ul style="list-style-type: none"> This objective should be consolidated with broader housing needs. 	[REMOVED]
LU-4.11 Develop regulations guiding appearance, scale, and location of new development to enable a range of dwelling types and amenities.	<ul style="list-style-type: none"> This policy is vague and should be implemented through more specific policies. 	[REMOVED]
LU-4.12 Improve the existing multi-family housing stock by encouraging, through public- private partnerships, revitalization and replacement of existing apartment complexes in appropriate locations throughout the city.	<ul style="list-style-type: none"> Condense and revise for clarity. 	LU-4.12 Improve the existing multi-family housing stock by encouraging, through public-private partnerships, Encourage revitalization and replacement rehabilitation of existing apartment complexes in appropriate locations throughout the city to maintain affordable and family-sized housing options.
LU-4.12 Direct multi-family housing to locations that support residents by providing direct access to public transportation, employment, services, open space, and other supporting amenities.	<ul style="list-style-type: none"> Given the realignment of multi-unit housing through HB 1110, this should be realigned. 	LU-4.12 Direct Ensure multi-family housing to locations that supports residents by providing direct with access to public transportation, employment, services, open space, and other supporting amenities.
LU-4.13 Encourage a high-quality pedestrian environment around multifamily housing sites through the provision of walkways, lighting, outdoor furniture, bicycle parking, open space, landscaping, and other amenities.	<ul style="list-style-type: none"> Revise and combine with the following policy. 	LU-4.13 Encourage a high-quality pedestrian environment around multifamily housing sites through the provision of walkways, lighting, outdoor furniture, bicycle parking, open space, landscaping, and other amenities in neighborhoods, and require on-site amenities such as walkways, trails, and bike paths to be connected to adjacent public facilities.
LU-4.14 Require that on-site amenities such as walkways, trails, or bike paths be connected to adjacent public facilities.	<ul style="list-style-type: none"> Combine with previous policy. 	[REMOVED]
(LU-4) Develop and maintain livable neighborhoods with a desirable quality of life.	<ul style="list-style-type: none"> This appears redundant. 	[REMOVED]
LU-4.15 Promote high quality residential living environments in all types of neighborhoods.	<ul style="list-style-type: none"> This policy is overly vague. 	[REMOVED]
LU-4.16 Promote community identity, pride, and involvement in neighborhoods.	<ul style="list-style-type: none"> Consolidate with the following policy. 	LU-4.16 Promote community identity, pride, and involvement in neighborhoods through the City's neighborhood program and other activities.

Original Goal/Policy	Rationale for Change	Policy Edits
<p>LU-4.17 Continue to support the City's neighborhood program to encourage neighborhood involvement, address local conditions, and provide neighborhood enhancements.</p>	<ul style="list-style-type: none"> Included in the previous policy. 	<p>[REMOVED]</p>
<p>LU-4.18 Protect the character of existing single-family neighborhoods by promoting high quality of development, including through planned development districts (PDDs.)</p>	<ul style="list-style-type: none"> The purpose of this policy and the rationale for applying it only to single-family neighborhoods are unclear. 	<p>LU-4.18 Protect the character of existing single-family neighborhoods by promoting high quality of development, including through planned development districts (PDDs.)</p>
<p>LU-4.19 Use design standards to encourage housing types that protect privacy, provide landscaping or other buffering features between structures of different scale, and/or promote investments that increase property values where housing that is more dense is allowed in existing single-family neighborhoods.</p>	<ul style="list-style-type: none"> This should be applied more generally, and the rationale regarding property value should be removed. 	<p>LU-4.19 Use design standards to encourage housing types that protect privacy, provide landscaping or other buffering features between buffers to address structures of different scales, and/or promote investments that increase property values where housing that is more dense is allowed in existing single-family neighborhoods in high-quality urban environments.</p>
<p>LU-4.20 Development standards for flats and triplex developments should encourage design at the scale of single-family developments by limiting building length and heights.</p>	<ul style="list-style-type: none"> This should be made more general. 	<p>LU-4.20 Development standards for flats and triplex developments should encourage design at the scale of single-family developments consistent scales in neighborhoods. by limiting building length and heights.</p>
<p>LU-4.21 Relate the size of structures to the size of lots in order to create development that fits into a neighborhood.</p>	<ul style="list-style-type: none"> The rationale for this as a policy is unclear and likely unnecessary. 	<p>[REMOVED]</p>
<p>LU-4.22 New single-family subdivisions should provide pedestrian and vehicular connections to adjoining residential development unless a determination is made that a physical features of the site, such as a ravine, wetland or pre-existing developed property prevents practical implementation of this provision.</p>	<ul style="list-style-type: none"> This should be made more general. 	<p>LU-4.22 New single-family subdivisions should provide pedestrian and vehicular motorized and non-motorized transportation connections to adjoining residential development neighborhoods unless a determination is made that a physical features of the site, such as a ravine, wetland or pre-existing developed property prevents practical implementation of this provision prevent feasible connections.</p>
<p>(LU-4) Recognize the unique requirements of residences located on busy arterials and other heavily used corridors.</p>	<ul style="list-style-type: none"> This may not require a separate goal. 	<p>[REMOVED]</p>

Original Goal/Policy	Rationale for Change	Policy Edits
LU-4.23 Allow greater flexibility with regard to development standards for residential properties located on busy road corridors.	<ul style="list-style-type: none"> Consolidate and summarize. 	LU-4.23 Allow greater flexibility with regard to development, design, and landscaping standards for residential properties located on busy road corridors major arterials to mitigate impacts from adjacent traffic.
LU-4.24 Examine where transportation design tools, attractive fences or walls, and landscaping may be used to buffer homes from adjacent traffic.	<ul style="list-style-type: none"> Consolidated with previous policy. 	[REMOVED]
(LU-4) Support those who wish to work from home while preserving the residential character of the residentially designated areas.	<ul style="list-style-type: none"> This may not require a full goal. 	[REMOVED]
LU-4.25 Continue allowing home-based businesses that do not conflict with typical neighborhood functions.	<ul style="list-style-type: none"> This can be edited for clarity. 	LU-4.25 Continue allowing Allow home-based businesses in residential neighborhoods that do not conflict with typical neighborhood functions residential uses.
LU-4.26 Provide opportunities for "invisible" home businesses and support appropriate independent business and trades people and service providers to use their homes as a business base.	<ul style="list-style-type: none"> This policy appears redundant. 	[REMOVED]
LU-4.27 Incorporate emergent business trends and state licensure requirements into use standards for home-based businesses.	<ul style="list-style-type: none"> It is unclear why this would be included in the Plan. 	[REMOVED]
(LU-4) Relate development of public amenities such as parks, recreation centers, libraries, and other services to residential neighborhoods.	<ul style="list-style-type: none"> This should be combined with other capital facilities and amenities policies. 	[REMOVED]
LU-4.28 Coordinate capital improvements with targeted growth and expected redevelopment.	<ul style="list-style-type: none"> This is very vague. 	[REMOVED]
(LU-4) Increase the percentage of homeownership in the City.	<ul style="list-style-type: none"> Edited for brevity. 	(LU-4) Increase the percentage of homeownership in the City.

Original Goal/Policy	Rationale for Change	Policy Edits
<p>LU-4.29 Allow zero lot line developments and flats with common wall construction on separately platted lots in designations that permit attached unit types.</p> <ul style="list-style-type: none"> Encourage condominium and fee simple townhouse developments with ground access and small yards. Encourage the development of small-detached houses on platted lots or condominium developments where lot areas with yards are established without platting. 	<ul style="list-style-type: none"> This can be broadened, as it appears highly prescriptive. 	<p>LU-4.29 Provide flexibility with development standards for housing types that can meet the demand for homeownership in the community. Allow zero lot line developments and flats with common wall construction on separately platted lots in designations that permit attached unit types.</p> <ul style="list-style-type: none"> Encourage condominium and fee simple townhouse developments with ground access and small yards. Encourage the development of small-detached houses on platted lots or condominium developments where lot areas with yards are established without platting.
<p>LU-4.30 Support first time homebuyer programs such as those available through the Washington State Housing Finance Commission and other similar private or not-for-profit programs with similar or better program elements and rates.</p>	<ul style="list-style-type: none"> This can be condensed. 	<p>LU-4.30 Support first-time homebuyer programs in the community such as those available through the Washington State Housing Finance Commission and other similar private or not-for-profit programs with similar or better program elements and rates.</p>
<p>LU-5 Recognize relocation issues brought about by demolition or conversion to another use.</p>	<ul style="list-style-type: none"> Refine this goal to better reflect the intent of the policies. 	<p>LU-5 Recognize relocation issues brought about by demolition or conversion to another use. Mitigate housing displacement and the loss of affordable housing units from development in the city.</p>
<p>LU-5.1 On an annual basis, provide a report to policy makers on the loss of affordable housing due to demolition or conversion.</p>	<ul style="list-style-type: none"> Revisions for clarity. 	<p>LU-5.1 On an annual basis, provide Provide a regular report to policy makers Council on the loss of affordable housing due to demolition or conversion.</p>
<p>LU-5.2 Identify affordable housing resources that may be lost due to area-wide redevelopment or deteriorating housing conditions.</p>	<ul style="list-style-type: none"> Revisions for clarity. 	<p>LU-5.2 Identify and address affordable market-rate and subsidized housing resources that may be lost at risk due to area-wide redevelopment pressures or deteriorating housing conditions.</p>

Original Goal/Policy	Rationale for Change	Policy Edits
<p>LU-5.3 Enforce the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended by the Uniform Relocation Act Amendments of 1987 and any subsequent amendments, to provide financial and relocation assistance for people displaced as a result of construction and development projects using federal funds. Lakewood shall also enforce Section 104(d) of the Housing and Community Development Act of 1974, as amended, requiring the replacement of low- and moderate-income housing units that are demolished or converted to another use in connection with a CDBG project.</p>	<ul style="list-style-type: none"> This is very long and needs to be revised for clarity. Note that the policy should also be separated. 	<p>LU-5.3 Enforce the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended by the Uniform Relocation Act Amendments of 1987 and any subsequent amendments, to provide Require financial and relocation assistance for people displaced as a result of construction and development projects using federal funds.</p>
	<ul style="list-style-type: none"> Separated from above. 	<p>LU-X.X Lakewood shall also enforce Section 104(d) of the Housing and Community Development Act of 1974, as amended, requiring the Require replacement of low- and moderate-income housing units that are demolished or converted to another use in connection with a CDBG project projects supported by CDBG funds.</p>
<p>LU-5.4 Consider the use of CDBG funds for relocation payments and other relocation assistance to persons displaced as a result of demolition, conversion to another use, or public actions such as targeted crime reduction programs.</p>	<ul style="list-style-type: none"> Clarify and condense. 	<p>LU-5.4 Consider the use of Apply CDBG funds as applicable for relocation payments and other relocation assistance to persons displaced as a result of demolition, conversion to another use, or public actions such as targeted crime reduction programs.</p>
<p>PS-18 Provide decent affordable housing.</p>	<ul style="list-style-type: none"> This has been included under previous goals. 	<p>[REMOVED]</p>
<p>PS-18.1 Preserve existing owner-occupied housing stock.</p>	<ul style="list-style-type: none"> This has been covered previously. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Provide a range of home repair assistance to qualified lower-income homeowners. 	<ul style="list-style-type: none"> This has been covered previously. 	<p>[REMOVED]</p>
<p>PS-18.2 Expand/sustain affordable homeownership opportunities.</p>	<ul style="list-style-type: none"> This has been covered previously. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Reduce the financial burden of new homeowners through assistance with down payment for home purchases. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Provide housing counseling to homeowners and potential homebuyers. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Collaborate with partners and housing providers toward the goal of expanding homeownership opportunities. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>

Original Goal/Policy	Rationale for Change	Policy Edits
<p>PS-18.3 Provide assistance to preserve the quality and habitability of affordable rental housing.</p>	<ul style="list-style-type: none"> This has been covered previously. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Provide incentives to improve properties. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Collaborate with partners and housing providers to develop and implement strategies to preserve affordable rental housing. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Support the crime-free housing activities. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Support fair housing activities such as landlord/tenant counseling. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<p>PS-18.4 Provide assistance for a continuum of housing for persons with special needs, homeless persons and people at risk of homelessness.</p>	<ul style="list-style-type: none"> This is largely covered in previous policies. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Develop partnerships with housing providers and human services agencies providing emergency shelters, permanent supportive, and repaid re-housing assistance. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Support the efforts of the Continuum of Care and its current Plan to End homelessness in Pierce County. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<p>PS-18.5 Reduce barriers to affordable housing by supporting fair housing activities such as outreach and education.</p>	<ul style="list-style-type: none"> This has been covered previously. 	<p>[REMOVED]</p>
<ul style="list-style-type: none"> Support fair housing activities such as outreach and education. 	<ul style="list-style-type: none"> These are implementation steps that should be defined elsewhere. 	<p>[REMOVED]</p>
<p>PS-18.6 Develop new affordable housing options as new funding opportunities become available.</p>	<ul style="list-style-type: none"> This is overly broad and can be covered elsewhere. 	<p>[REMOVED]</p>

Housing Element

In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070 (2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to Commerce’s housing webpages for further information about the new requirements:

Updating GMA Housing Elements and Planning for Housing

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
a. Goals, policies, and objectives for the preservation, improvement, and development of housing. RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a)	Yes. See Section 3.2.	No. However, these provisions will be revised under the current review.	
b. Within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-300	Yes. As per Section 2.3.3, “middle housing” types considered, and allowed in Mixed Residential to allow for higher achieved densities.	Yes. Housing targets by income band as per RCW 36.70A.070(2)(a) and other recent changes will require broader application of moderate density housing types.	
c. Consideration of housing locations in relation to employment locations and the role of ADUs. RCW 36.70A.070(2)(d) amended in 2021	Yes. Mixed uses in Downtown and Lakewood Station are noted, and ADU policies are currently included under LU-3.8 and 9.	No. However, greater integration of ADUs into current policies should be provided as part of the current review.	
d. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction’s share of housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c) .	No. While Policies LU-2.14 and 15 set targets for low-income housing, these are not consistent with shares of need as per RCW 36.70A.070(2)(a) .	Yes. Revisions will be provided to be consistent with Countywide Planning Policies.	Note that this is a new requirement under RCW 36.70A.070(2)(a) , and will be included as per Pierce County Countywide Planning Policies.

Housing Element (continued)

27 of 126

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>e. Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)</p>	<p>No. The current Plan discusses these uses, but does not specifically identify capacity.</p>	<p>Yes. No policy currently exists.</p>	<p>Note that this is a revised requirement under RCW 36.70A.070(2)(c).</p>
<p>f. Adequate provisions for existing and projected housing needs for all economic segments of the community. RCW 36.70A.070(2)(d) amended in 2021, WAC 365-196-010(g)(ii), WAC 365-196-300(f), WAC 365-196-410 and see Commerce’s Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan</p>	<p>No. While Policies LU-2.14 and 15 set targets for low-income housing, these are not consistent with RCW 36.70A.070(2)(d).</p>	<p>Yes. These will be provided in alignment with current Commerce guidance and Pierce County Countywide Planning Policies.</p>	<p>Note that this is a revised requirement under RCW 36.70A.070(2)(d).</p>
<p>g. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability <p>RCW 36.70A.070(e) new in 2021</p>	<p>No. No policies currently exist to evaluate racially disparate impacts.</p>	<p>Yes. No policy currently exists.</p>	<p>Note that this is a new requirement under RCW 36.70A.070(2)(e).</p>

Housing Element (continued)

28 of 126

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>h. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. RCW 36.70A.070(2)(f) new in 2021</p>	<p>No. No explicit policies currently exist in the Plan to address racially disparate impacts of prior policies.</p>	<p>Yes. No policy currently exists.</p>	<p>Note that this is a new requirement under RCW 36.70A.070(2)(e).</p>
<p>i. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments. RCW 36.70A.070(2)(g) new in 2021</p>	<p>No. No explicit policies currently exist in the Plan to address specific areas at high risk of displacement for the existing population. However, note that</p>	<p>Yes. No policy currently exists.</p>	<p>Note that this is a new requirement under RCW 36.70A.070(2)(g). As per notes from the Department of Commerce, this work should identify areas where anti-displacement tools may be applied, but may not need to be in the Comprehensive Plan itself.</p>
<p>j. Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. RCW 36.70A.070(2)(h) new in 2021</p>	<p>No. No explicit policies currently exist in the Plan to address specific areas at high risk of displacement for the existing population. However, note that</p>	<p>Yes. No policy currently exists.</p>	<p>Note that this is a new requirement under RCW 36.70A.070(2)(h).</p>

City of Lakewood Housing Needs Assessment

June 2023



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Introduction

The City of Lakewood (see Exhibit 1) intends to update the Housing Element of its Comprehensive Plan with the deadline for adoption by December 2024. As part of this work, several steps are required to evaluate the current state of the housing market, determine current and projected housing gaps, assess existing policies, and determine changes to the Comprehensive Plan necessary to comply with state law and achieve local housing goals.

This report is divided into three main parts:

Current Housing Needs Assessment

The first part of this report provides an assessment of the housing needs in Lakewood. It is divided into the following sections:

- **Population and households.** Major characteristics of the population of Lakewood are described, including age, race, and income.
- **Workforce characteristics.** The dynamics of the local workforce are described, including the commuting patterns for the people that live and work in the city.
- **Housing supply and development.** Characteristics of the local housing stock are described, including the current units in the City and development trends for the market. This focuses on Lakewood, but also includes neighboring cities' information for comparison.
- **Housing market trends.** Current data about the market, including rent levels and housing sale prices. This highlights some of the major local and regional trends and indicate areas of potential concern for future action.
- **Housing affordability.** Examines major characteristics about local affordability and housing costs, with a focus on the accessibility of rental housing to residents.
- **Housing incentive programs.** Highlights some of Lakewood's existing programs that will have an impact on local housing. This focuses on major programs that incentivize new development and preserve housing affordability, but also includes other programs that are intended to maintain the safety and security of the existing housing stock.

Projected Housing Needs Assessment

The second part of this report provides the projected housing needs that the City of Lakewood will must plan for over the next twenty years. This focuses on:

- **Population and housing projections.** Estimates are drawn from the Pierce County Countywide Planning Policies to identify the targeted population of Lakewood by 2044, as well as the expected total housing stock required.
- **Projected housing needs by income level.** Based on guidance from the Department of Commerce, projected housing needs are divided by income level as necessary to present estimated needs by affordability targets.

- **Projected needs for emergency housing, shelters, and permanent supportive housing.** The Department of Commerce is providing the estimated local allocations for specialized types of housing directed at addressing homelessness and housing insecurity. This includes emergency housing and permanent supportive housing that can provide longer-term housing solutions for those in need of support services as well as secure housing options.

Racial Equity and Displacement

The final component of this report is based on the need to address long-term, systemic issues resulting racial exclusion in the housing market as well as the potential for displacement of racial, ethnic, and religious communities which have been subject to discriminatory housing policies in the past. New requirements provided in the Growth Management Act require communities to analyze the following when developing the Housing Element of their Comprehensive Plans:¹

- Areas that may be at higher risk of displacement from market forces that occur with changes to zoning, development regulations, and capital investments;
- Local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing;
- Options for policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions; and
- Options for anti-displacement policies, with consideration given to the preservation of historical and cultural communities.

This section includes:

- **Assessment of racially disparate impacts and displacement risks.** Based on key metrics, an assessment of current racially disparate impacts in housing is provided, as well as an evaluation of major displacement risks. This incorporates several major measures of housing exclusion and risk factors for displacement, as incorporated into established measures of socioeconomic vulnerability.
- **Audit of housing policies.** This section provides a review of major policies included in the current version of the Comprehensive Plan to understand the scope of how local policies may impact racially disparate impacts, displacement, and exclusion in housing, and highlights options for changes to these policies.
- **Recommendations for action.** From the assessment of Lakewood's racial disparate impacts and displacement risks, this part of the report highlights what options may be available for the City to adopt to help address these issues.

Note that the information for this Housing Needs Assessment is based on a range of sources, including:

- **Washington State Office of Financial Management** data on current population and housing, including more detailed information about housing development characteristics. Data on housing and population is available to April 2022, with information on housing production available to 2020.

¹ See [RCW 36.70A.070\(2\)](#).

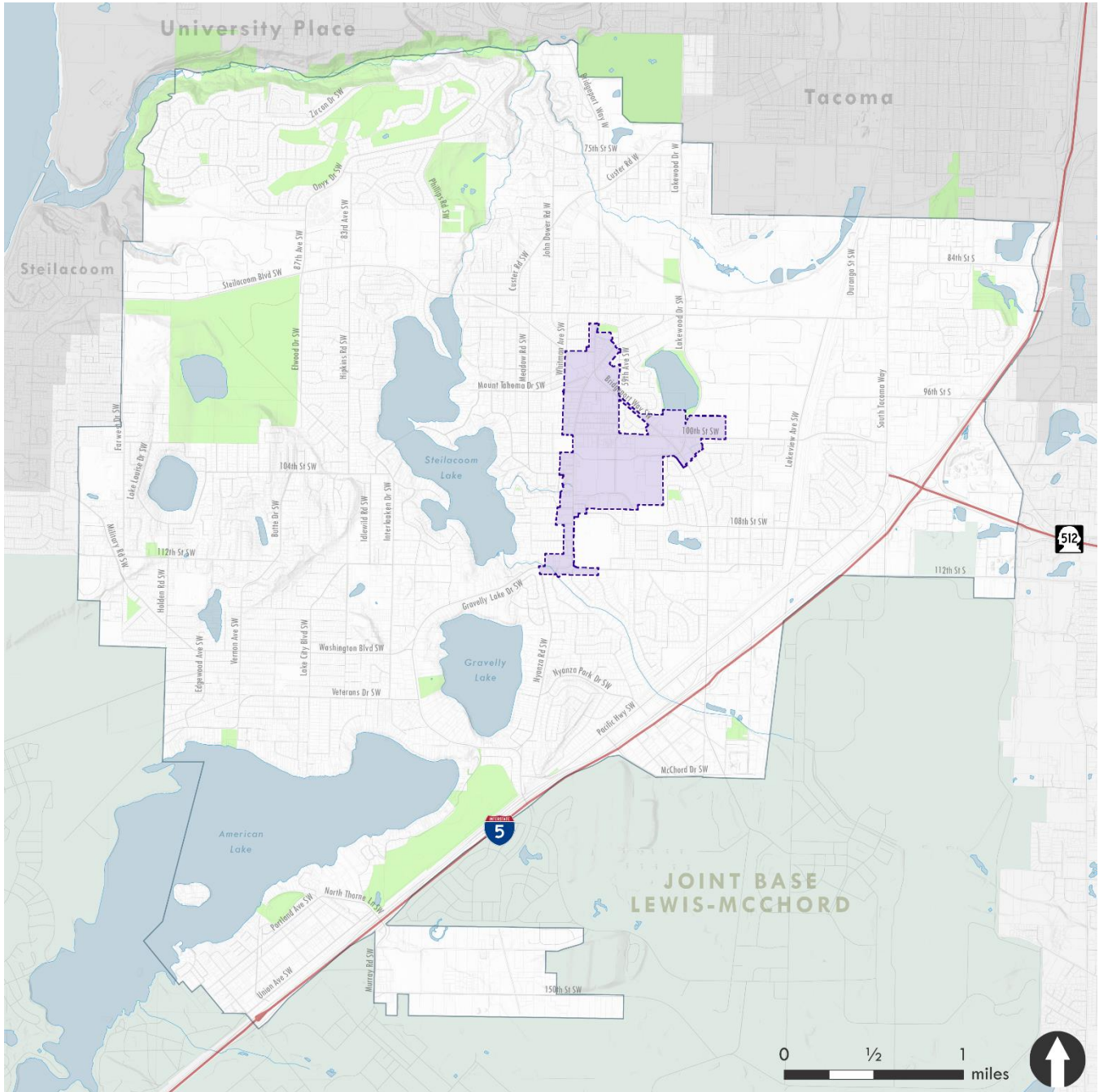
- **American Community Survey (ACS)** data from the US Census, with the most recent data available from the 2016–2020 5-year dataset for Lakewood. Note that this represents the most up-to-date demographic information available.
- **Comprehensive Housing Affordability Strategy (CHAS)** data from the US Department of Housing and Urban Development that relies on ACS microdata and pairs this with local housing market information to provide summaries of local housing affordability. The most recent CHAS dataset was released for 2015–2019.
- **Private sources of data**, including Zillow and CoStar, which are used to characterize the local housing markets. Note that this information is typically based on proprietary sources, and has coverage through 2022.

The lag in data availability is noted where applicable; while this may impact the immediacy of some of these results, this information represents the most up-to-date data that is commonly available.

Conclusion

The conclusion of this report details the major elements of the local housing market that should receive focus as part of new or revised policies. These points will receive additional attention in the review of local housing incentives as well as the development of the full Housing Element as part of the 2024 Comprehensive Plan Periodic Review per the Growth Management Act (GMA).

Exhibit 1. Overview of the City of Lakewood.



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water
- Parks
- Regional Growth Center
- Highways
- Arterials
- Roads

BERK
Map Date: October 2022

Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Part 1: Current Housing Needs

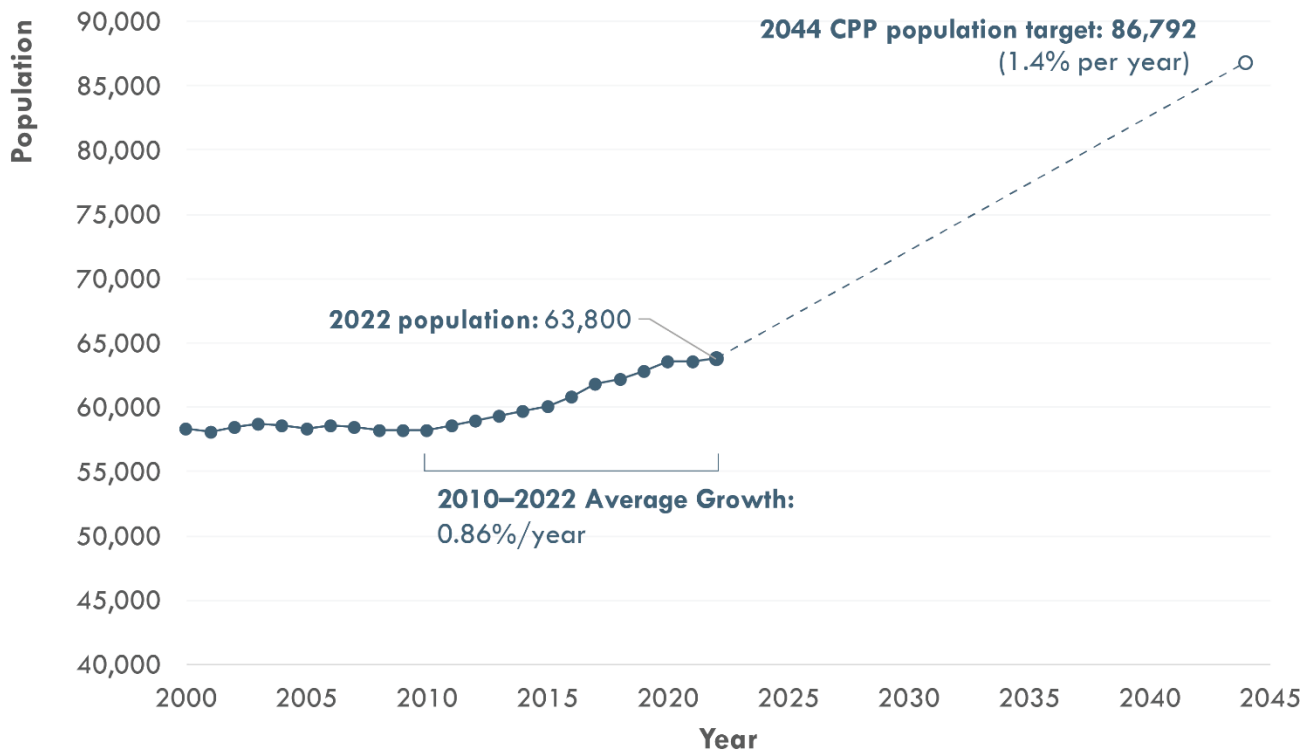
Population and Households

Population characteristics

Exhibits 2 through 8 provide details about the population of Lakewood, including population counts, projected targets, and age and race/ethnicity characteristics. From this information, there are several findings that are relevant looking at future housing needs:

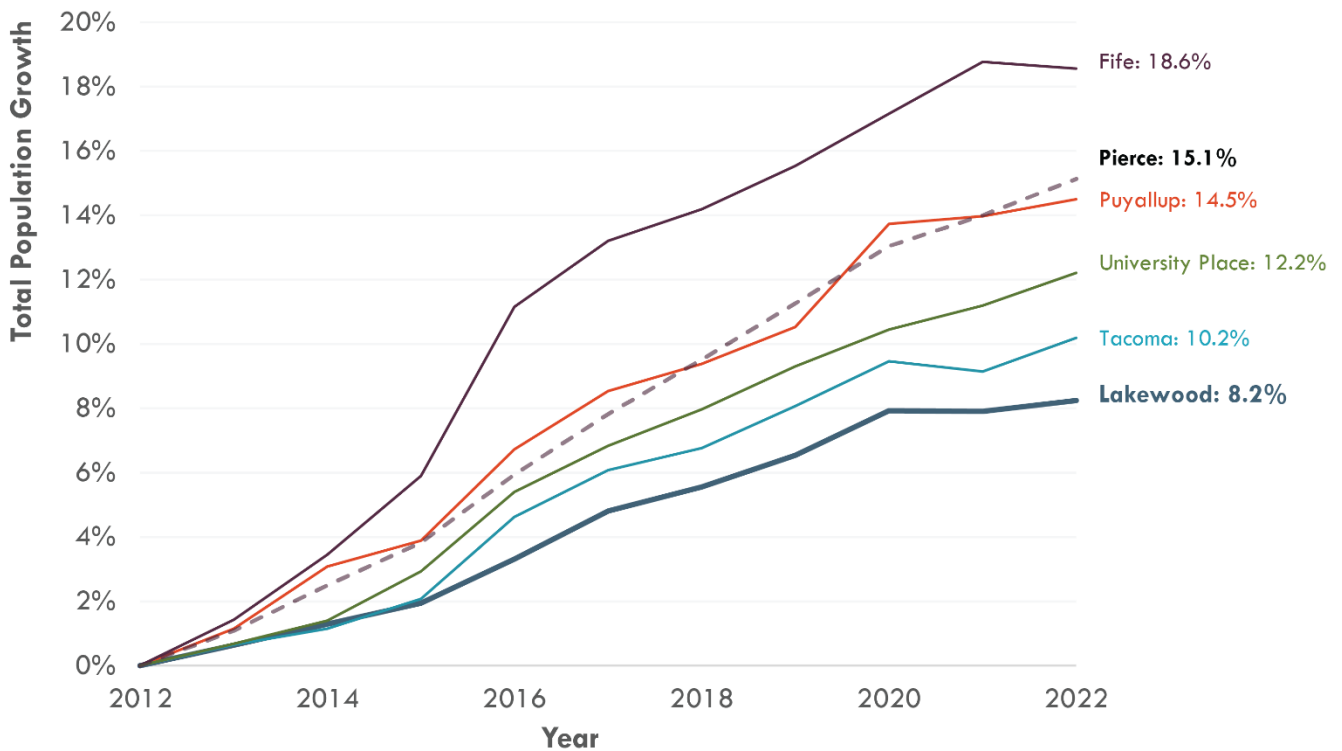
- **Lakewood has had notably low population growth since incorporation.** Exhibits 2 and 3 highlight population trends for Lakewood, with Exhibit 2 highlighting historical population growth since 2000, while Exhibit 3 provides information about how growth has compared to other nearby communities. Overall, this highlights that Lakewood has had low population growth, amounting to about 0.9% per year since 2010, without a significant increase in growth after 2014.
- **Expected population targets are significantly higher than historical population trends.** Exhibit 2 also highlights that under the recently approved Countywide Planning Policies for Pierce County, it is expected that Lakewood's population will grow by an additional 22,992 people to 86,792 total residents. This represents a growth rate of about 1.4% per year, which is a significant increase over recent historical trends.
- **The local population has a disproportionate number of younger adults.** Exhibit 4 highlights the age profile of Lakewood residents, with a comparison to the average for Pierce County as a whole. In comparison to other communities, Lakewood has a greater proportion of residents that are 20–29 years old. There is also a higher proportion of residents 60 years of age and older. This is possibly tied to the proximity to Joint Base Lewis-McChord (JBLM), both with younger service members living off-base and older veterans living closer to available veterans' facilities.
- **The Lakewood community is becoming more diverse.** Over the past decade, Lakewood has become notably more racially diverse. There has been a decline in both the proportional and total number of white residents (from 54% in 2010 to 48% in 2020), while other populations of people of color have increased over time (see Exhibit 5). Lakewood is home to a higher percentage of Black, Indigenous and people of color compared to Pierce County, as shown in Exhibit 7 in 2020.
- **Veterans form a key part of the population of the city.** Exhibit 8 provides a comparison between the proportion of veterans by age in Lakewood versus Pierce County as a whole. While the oldest veterans are represented at rates comparable to the county overall, Lakewood has a greater proportion of veterans in its population between the ages of 18 and 74. This is due in part to the presence of JBLM, including the availability of services to veterans in the community.

Exhibit 2. Historical Population and 2044 Population Target.



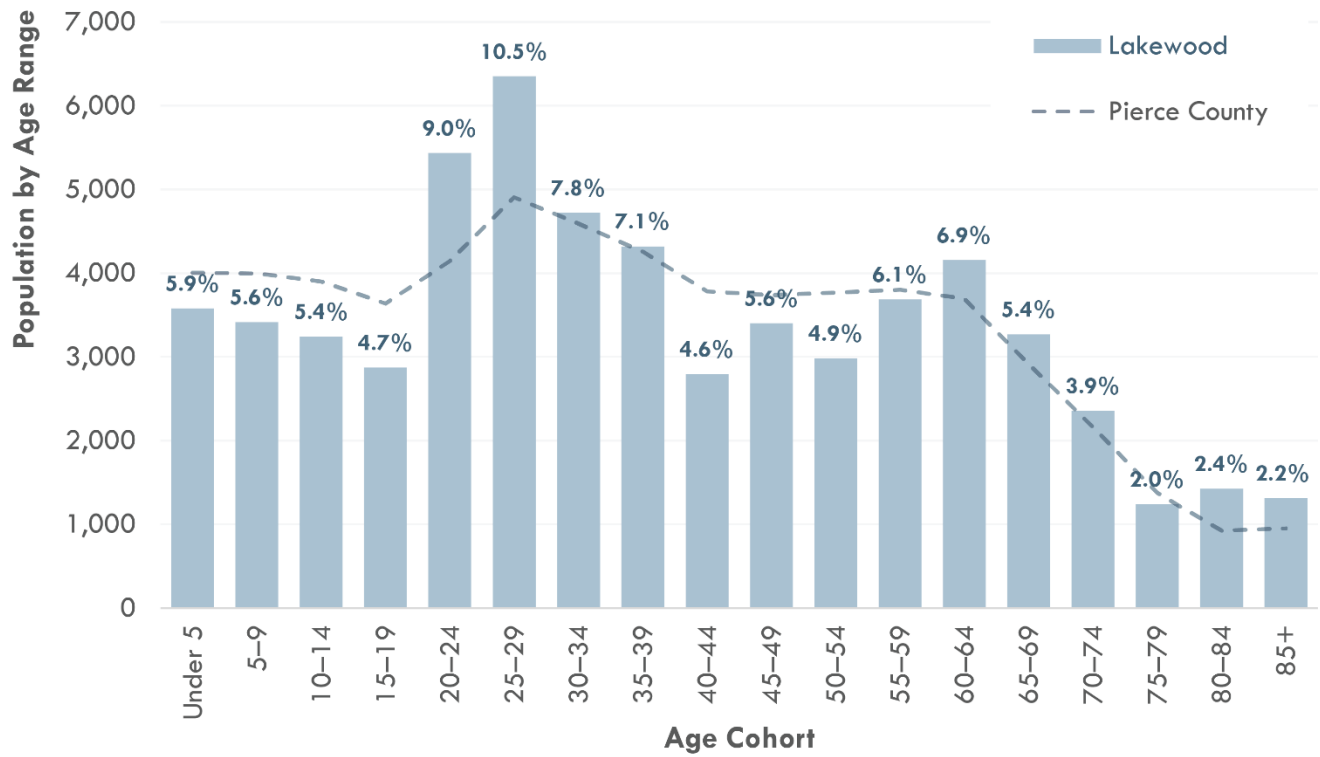
Source: OFM, 2022; BERK, 2022; Pierce County, 2022.

Exhibit 3. Population Growth, Lakewood and Neighboring Communities, 2010–2022.



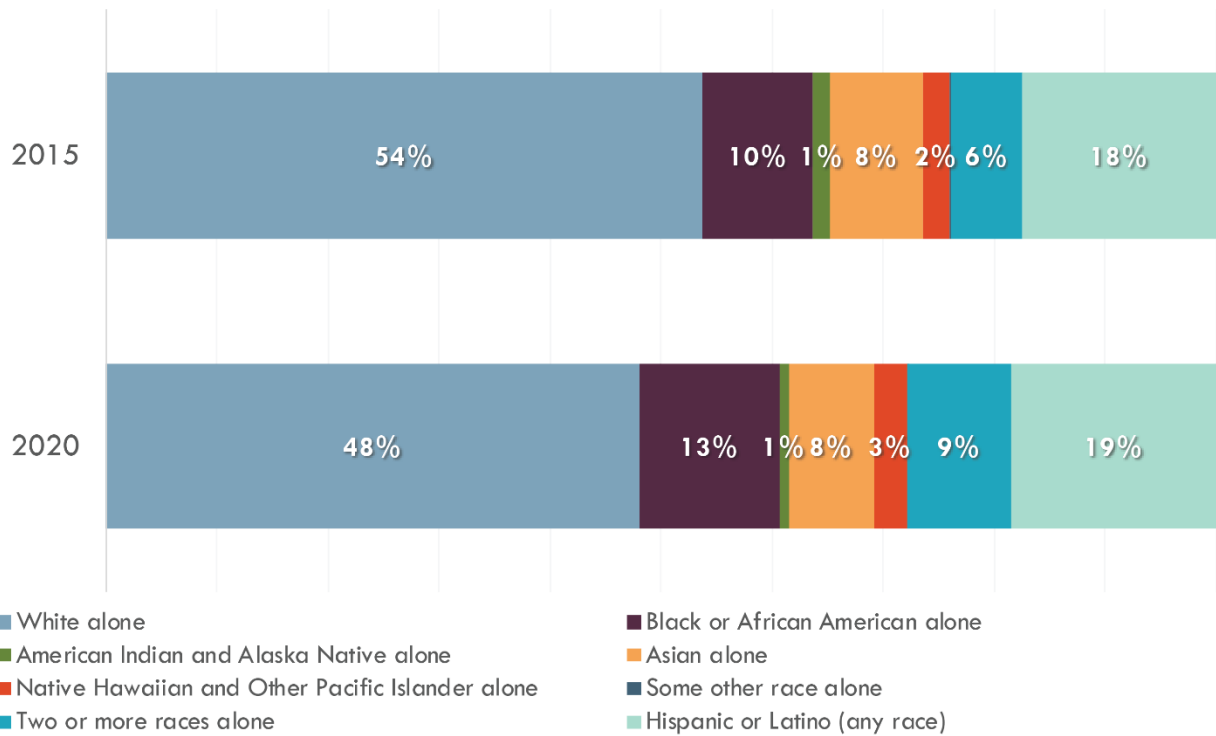
Source: OFM, 2022; BERK, 2022.

Exhibit 4. Population by Age, 2020.



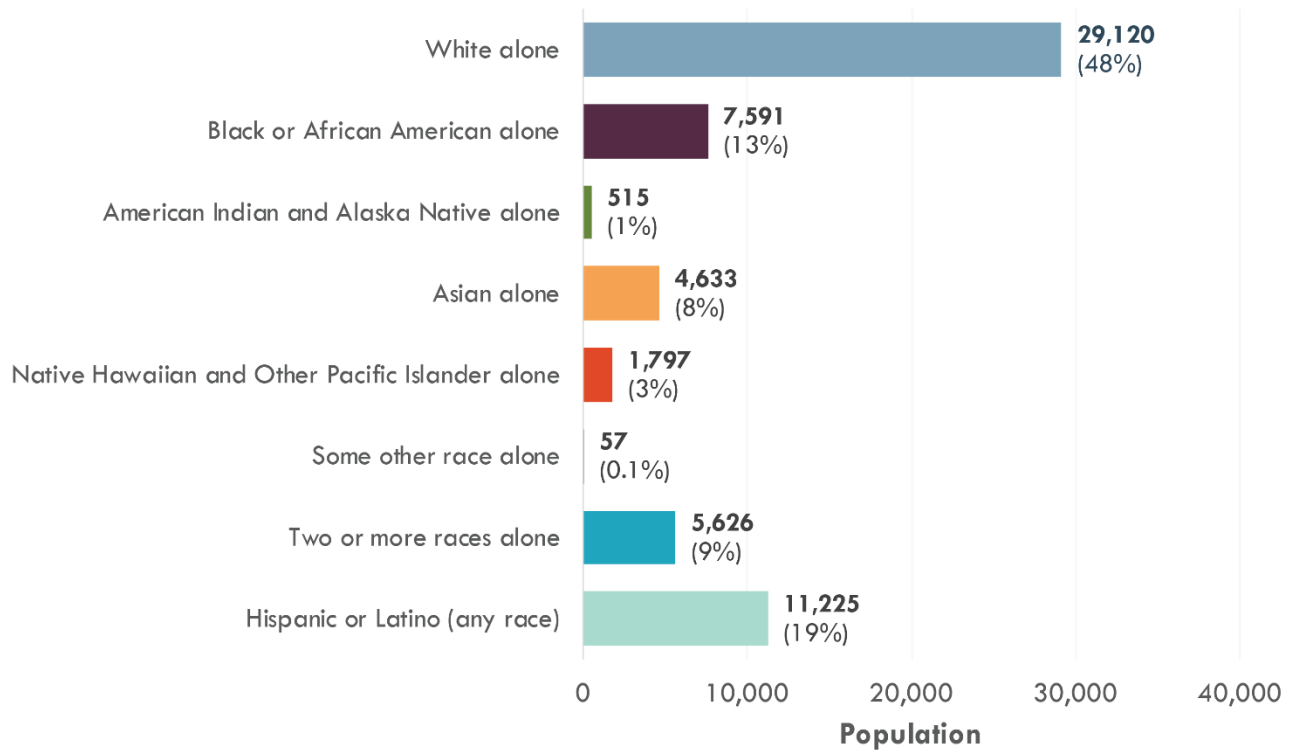
Source: 2020 ACS; BERK, 2022.

Exhibit 5. Proportion of Population by Race/Ethnicity, 2015 and 2020.



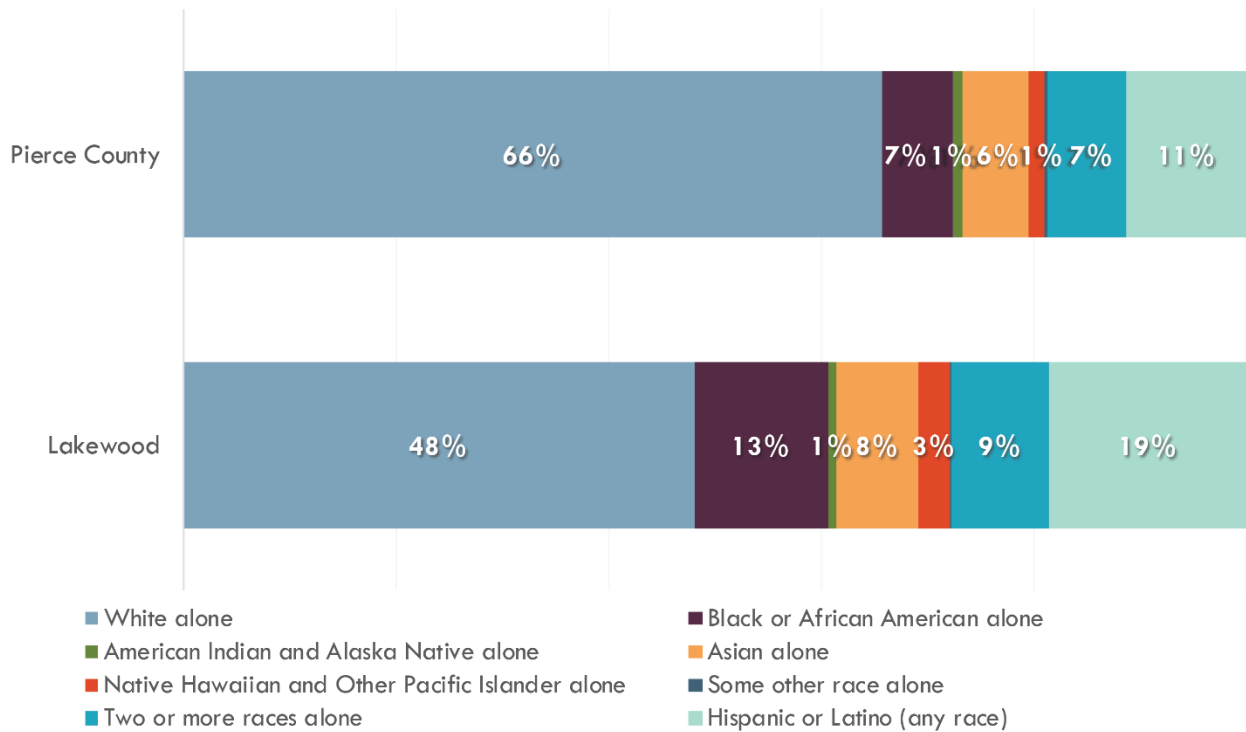
Source: 2020 ACS; BERK, 2022

Exhibit 6. Population by Race/Ethnicity, 2020.



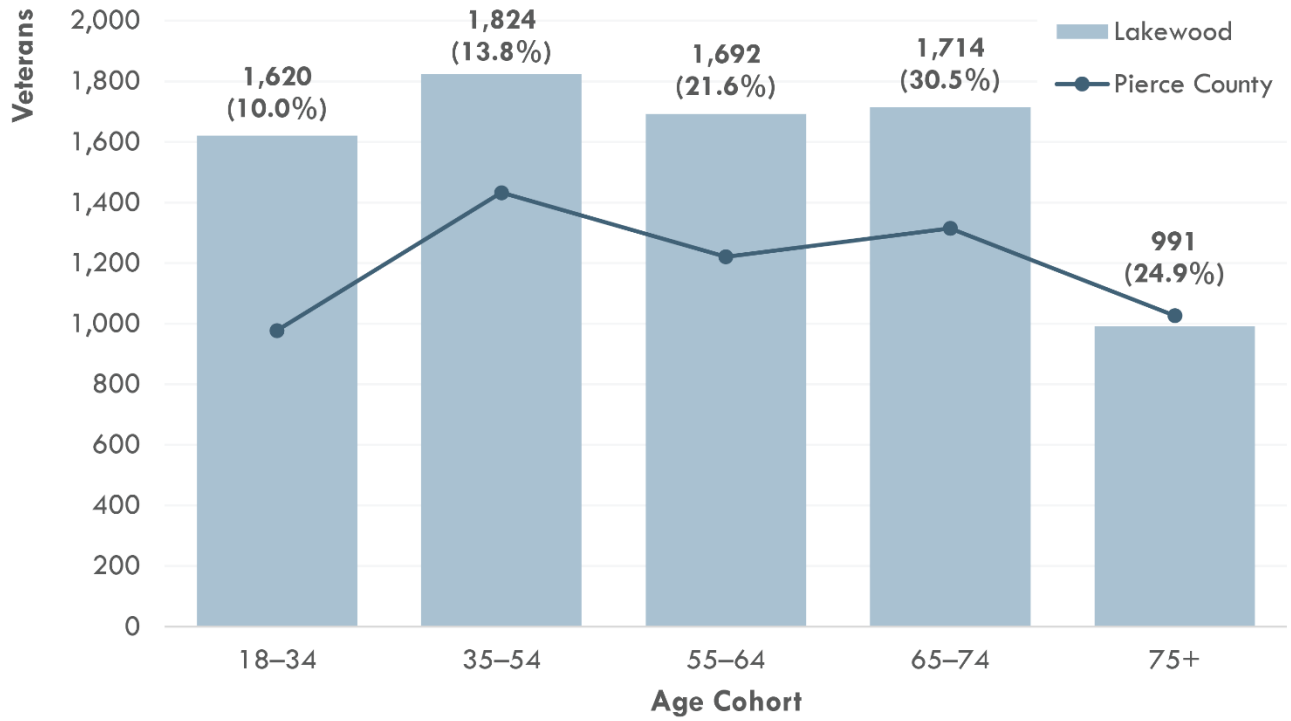
Source: 2020 ACS; BERK, 2022

Exhibit 7. Comparison by Race/Ethnicity, Lakewood and Pierce County 2020



Source: 2020 ACS; BERK, 2022

Exhibit 8. Veterans by Age, Lakewood and Pierce County.



Source: 2020 ACS; BERK, 2022.

Household characteristics

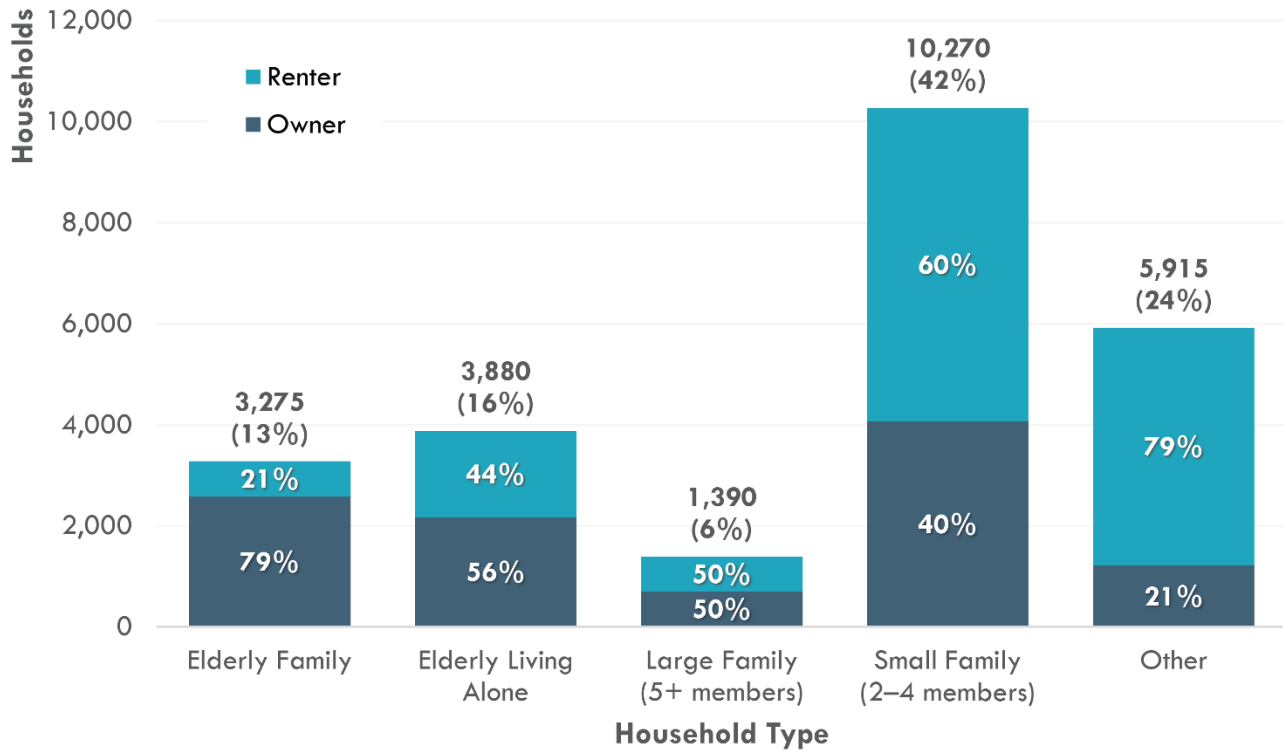
Exhibits 9 through 18 highlight major characteristics of households in Lakewood, with a focus on household income and tenure. These characteristics are important to consider when developing new housing goals and policies.

- **Small families are the most common type of household in Lakewood.** Exhibit 9 highlights that about 42% of households in the City are small families with two to four members. A majority of these households (60%) are renters, unlike larger families (50%), seniors living alone (44%), and senior couples (21%). A significant number – 79% - of non-family, non-senior households (including individuals and unrelated people living together) are renters.
- **Household incomes are lower than the county average.** As shown in Exhibit 10, the median household income for Lakewood in 2020 was \$55,723, about 27% lower than the median household income of Pierce County. This percentage difference is true for both family and non-family households.
- **Recent increases in median family income have been lower than in the county.** As shown in Exhibit 11, between 2010 and 2015, the median income in Lakewood grew by about 1.5% per year, while the county median grew by about 0.8% per year. Median incomes have increased more recently, but while the Pierce County median increased by about 4.9% per year between 2016 and 2020, the Lakewood median only increased by about 4.0% per year.
- **Lakewood’s lower median income is due to a higher representation of lower-income households.** As shown in Exhibit 12, there are a greater proportion of households earning less than \$75,000 in Lakewood than in the county. Although higher-income households are found in the City, the availability of affordable housing options needs to consider this skew in the distribution.
- **Household income differs distinctly between renters and owners.** Exhibit 13 highlights that there are clear differences in incomes between renters and owners. For owners, about 52% have household incomes that are at least at the county median family income (MFI) or higher. Conversely, about half of all renters are below 80% of the county MFI, and 25% are considered extremely low-income.
- **Black, Indigenous, People of Color (BIPOC) Households are more likely to rent than to own.** Exhibit 14 depicts that BIPOC households are more likely to rent. About 69% of Lakewood’s households of color rent in comparison to 47% of white, non-Hispanic, households. This is even more true for African American and non-white Hispanic households
- **Generally, a greater percentage of renting African-Americans households are lower income than overall.** Exhibit 15 displays the proportion of households renting in Lakewood divided by race/ethnicity and income category. Overall, the income distribution of white renting households skews slightly higher, while Black households skew lower. According to this dataset, 28% of Black or African American households are extremely low-income, compared to 18% of households overall.
- **Levels of homelessness in Lakewood have increased recently.** While homelessness can be difficult to evaluate accurately at times, information about rates of student homelessness collected by local school districts can be an important measure. Exhibit 17 includes data collected from the Lakewood School District under the McKinney-Vento Act, and highlights that student homelessness reached a

high in the 2018–2019 school year at 115 students, or 4.5% of the population. Levels of student homelessness have increased from 2.9–3.3% from 2015 to 2018, and since 2019 the percentage has stayed around 3.6%. These data do not include how COVID-19 has affected student or overall homelessness in the city.

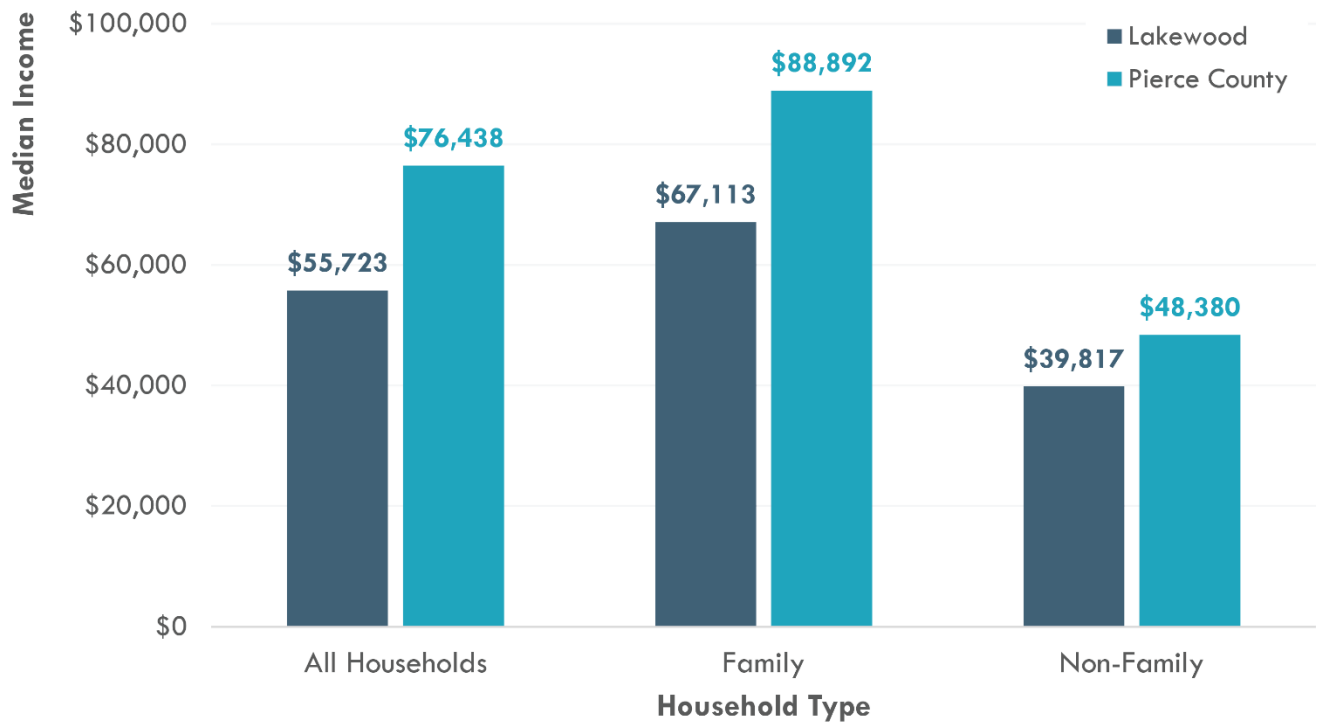
- **A greater proportion of low-income renter households have members with self-care or independent living limitations.** Exhibit 18 provides a breakdown of renting households according to their income category (as compared to median family income) and whether a member of the household has a self-care or independent living limitation. A significant proportion of very low- and extremely low-income households may be experiencing challenges with housing affordability and income related to disabilities.

Exhibit 9. Households by Type and Tenure



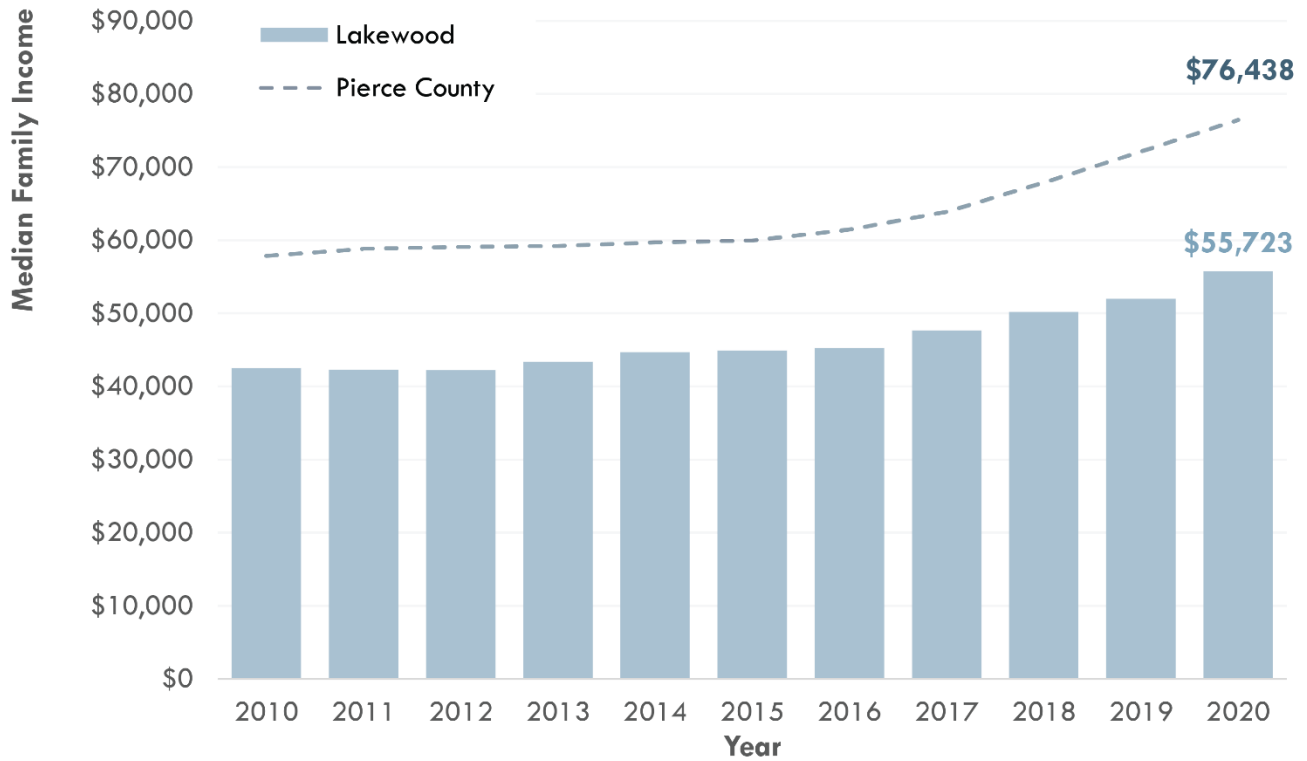
Source: 2018 CHAS; BERK 2022

Exhibit 10. Comparison of Household Median Income, Lakewood and Pierce County.



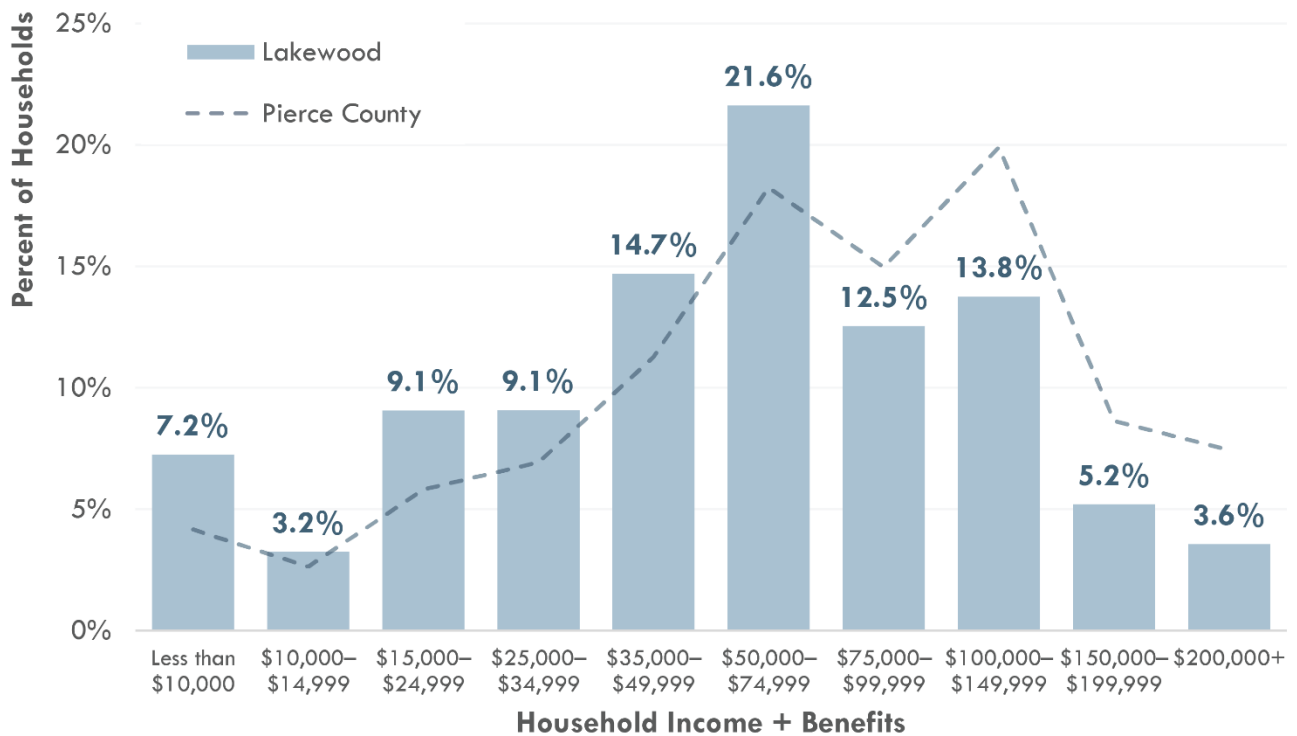
Source: 2020 ACS; BERK, 2022.

Exhibit 11. Historical Median Family Income, Lakewood and Pierce County.



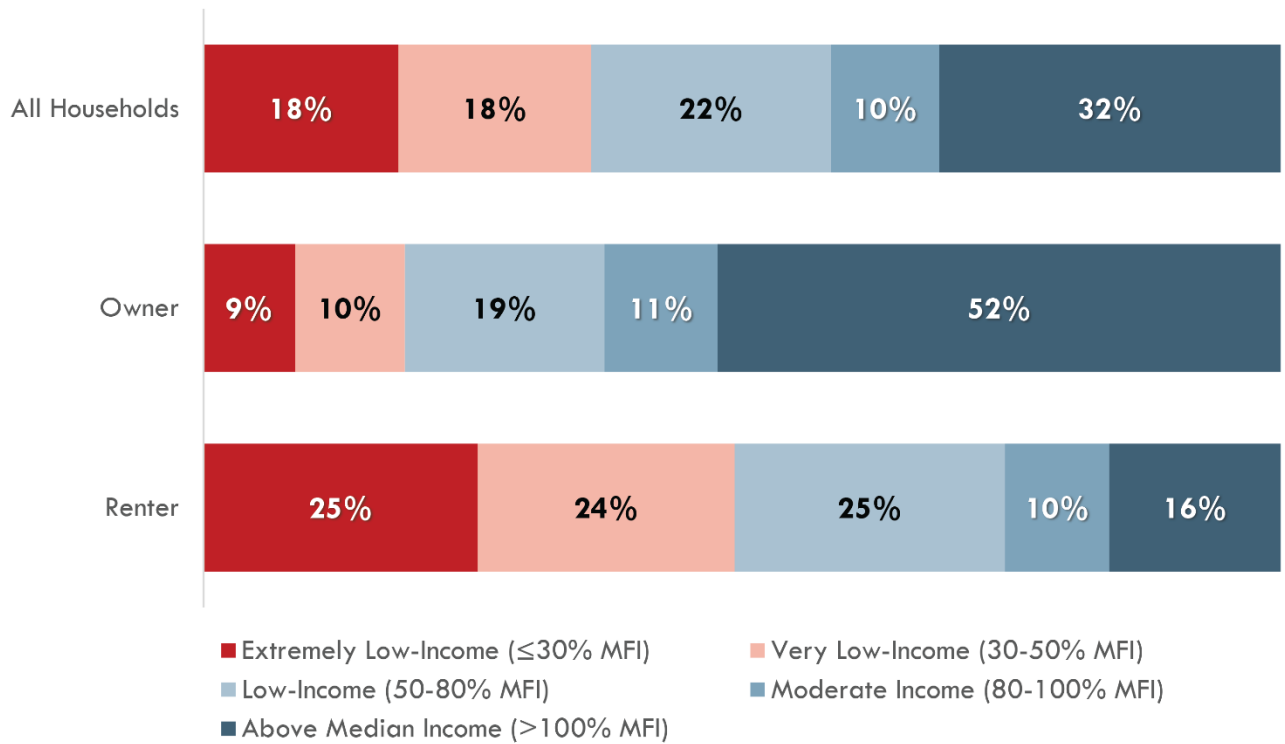
Source: 2020 ACS; BERK, 2022.

Exhibit 12. Households by Income Range, 2020.



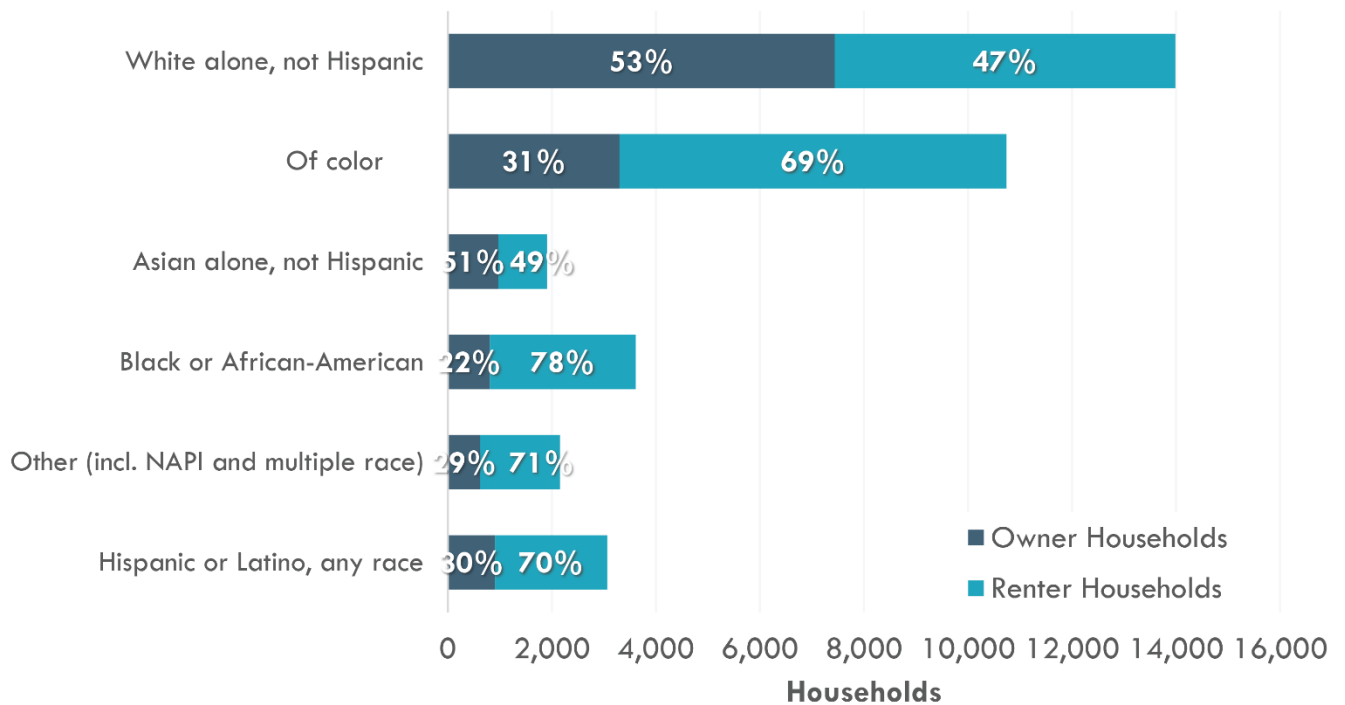
Source: 2020 ACS; BERK, 2022.

Exhibit 13. Households by Tenure and Income Group (%MFI), 2018.



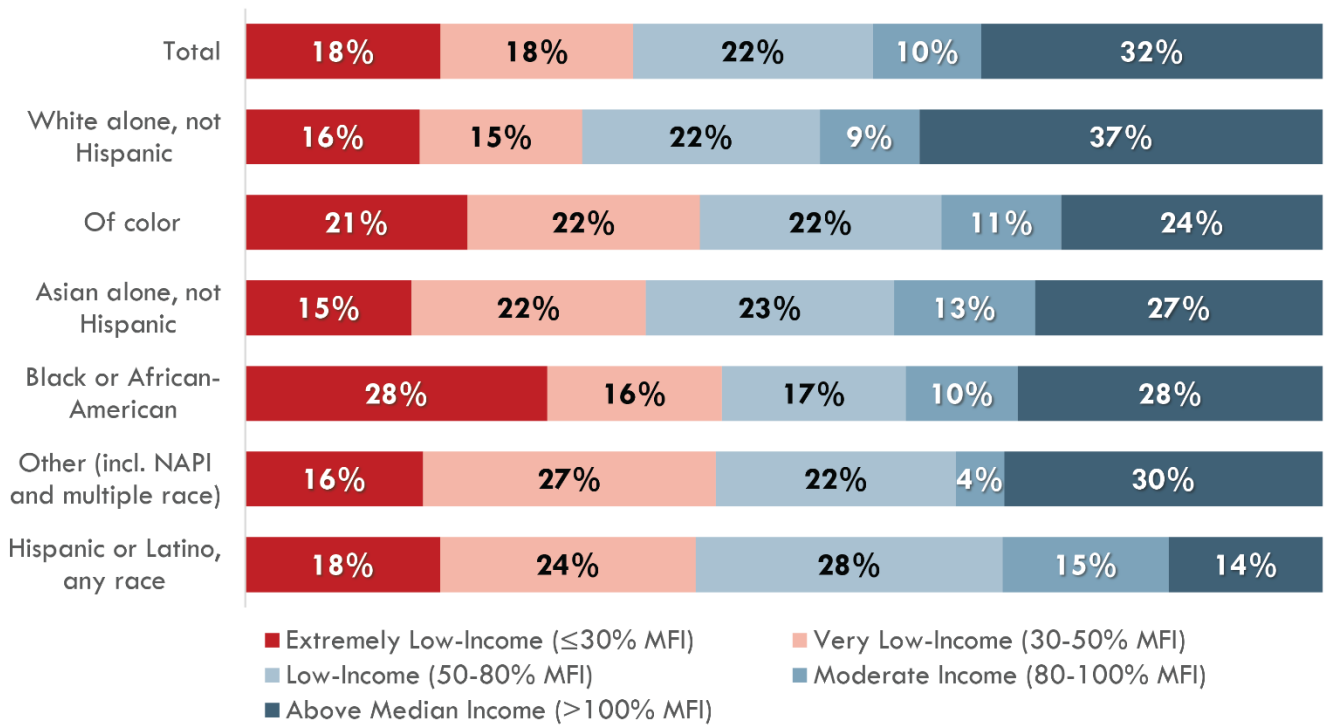
Source: 2018 CHAS; BERK, 2022.

Exhibit 14. Households by Race and Tenure, 2018.



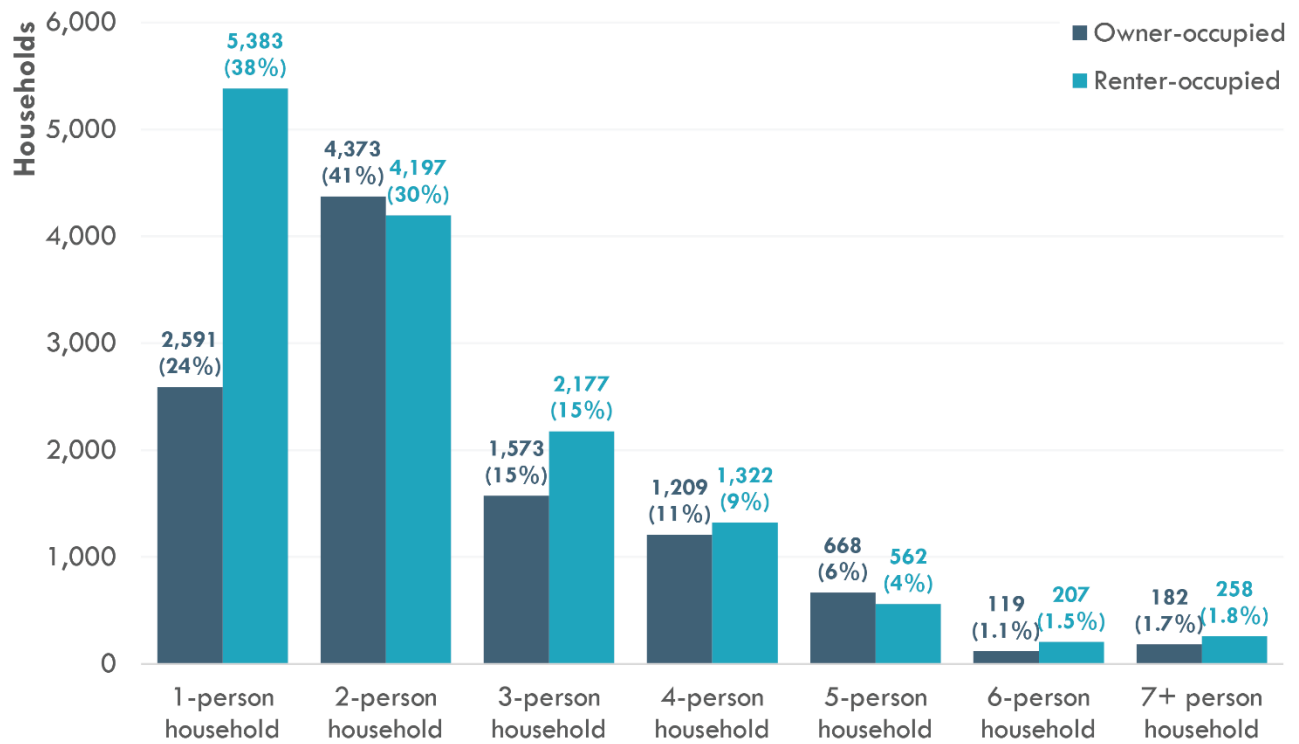
Source: 2018 CHAS; BERK, 2022.

Exhibit 15. Proportion of Renter Households by Race and Income Category, 2018.



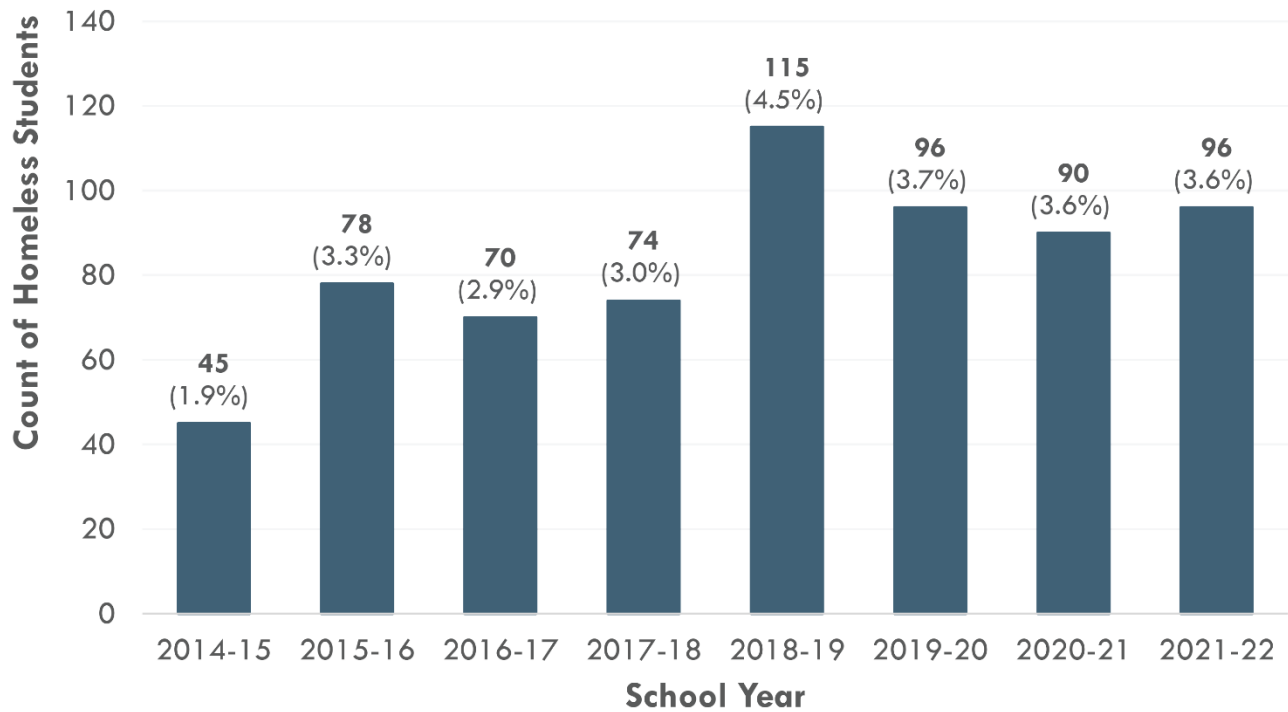
Source: 2018 CHAS; BERK, 2022.

Exhibit 16. Households by Size and Tenure



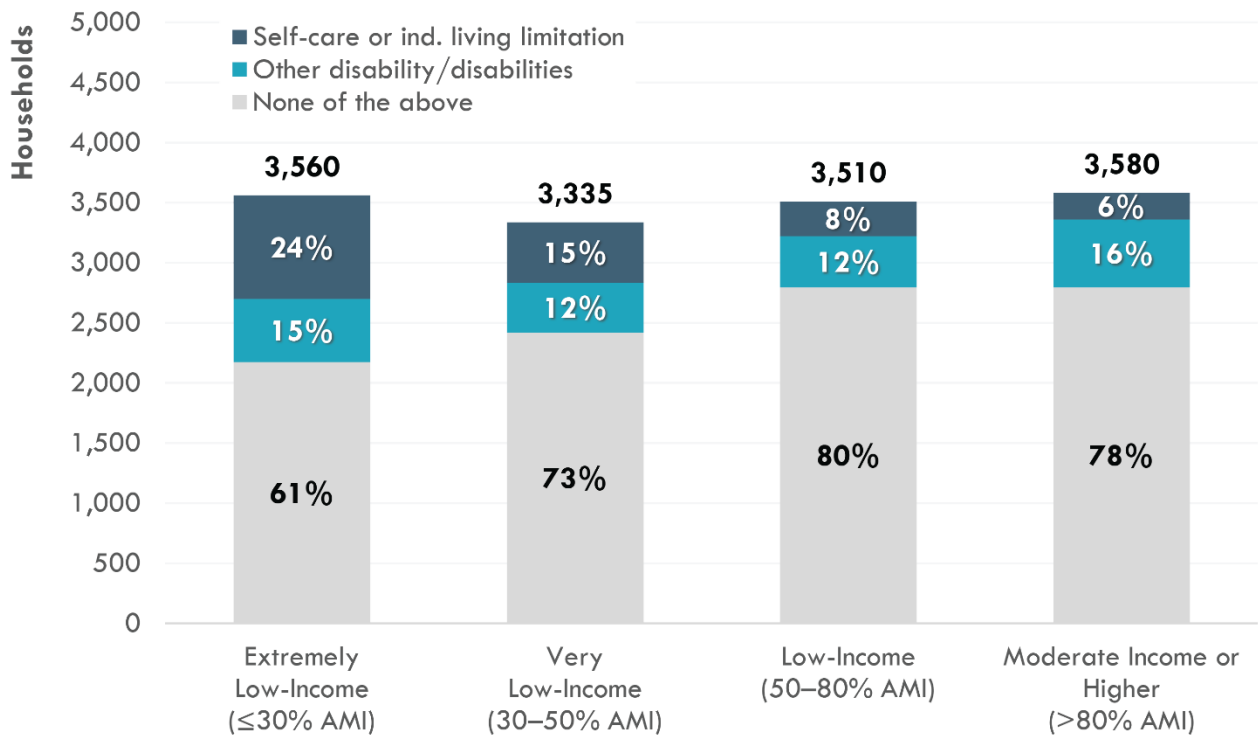
Source: 2018 CHAS; BERK, 2022.

Exhibit 17. Student Homelessness, Lakewood School District, 2014–2022.



Source: OSPI, 2022; BERK, 2022.

Exhibit 18. Renter Households by Disability Status and Income, 2019.



Source: 2018 CHAS; BERK, 2022.

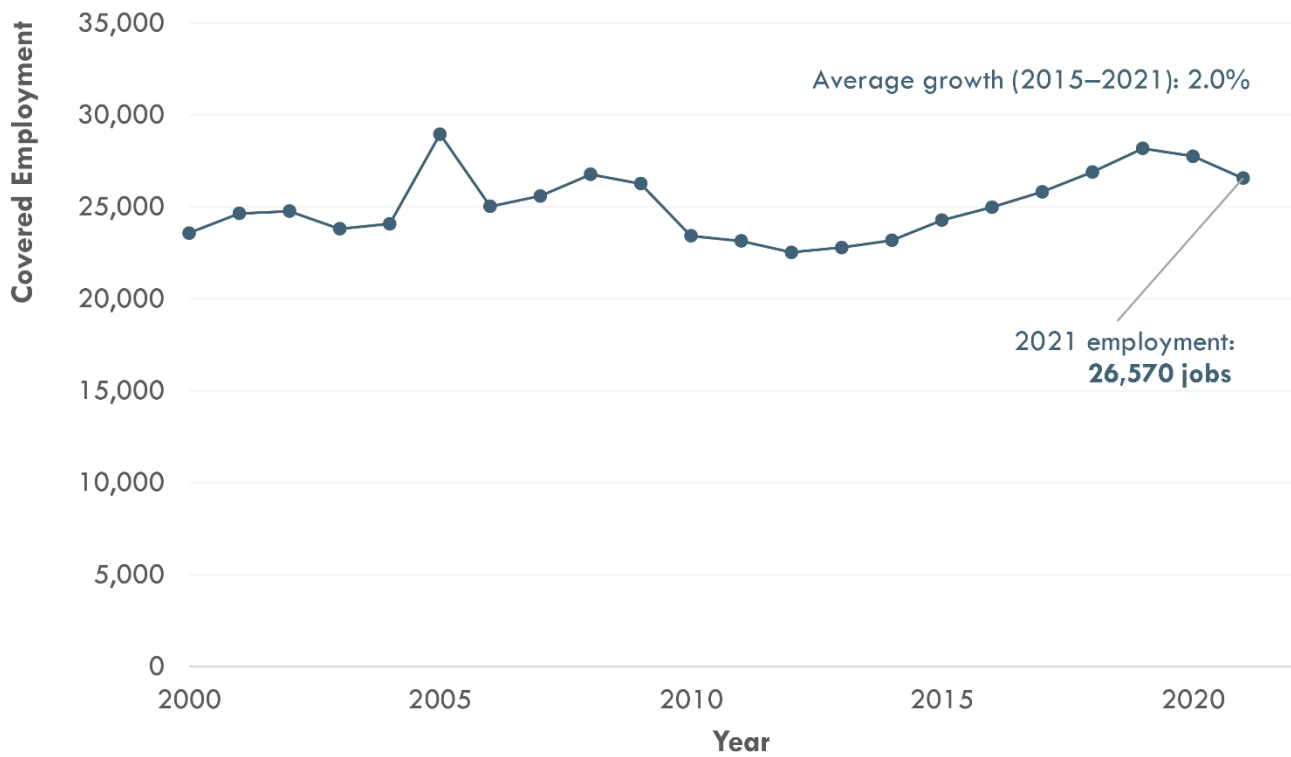
Workforce Characteristics

Lakewood is both a population center and a destination for local and regional employment. According to the PSRC, a total of 28,152 covered jobs were in Lakewood in 2021, which amounted to 1.04 jobs for every resident. This is important, as while Lakewood does serve a role as a residential community for commuters to regional job centers, including Tacoma, Seattle, and JBLM, it also serves as a local and regional employment center. Lakewood's PSRC-designated Regional Growth Center has the same boundaries as the 2018 Downtown Subarea.

Exhibits 19 and 20 provide a breakdown of covered primary employment by type, while Exhibit 21 and 22 show commuting patterns by highlighting where Lakewood workers reside and where Lakewood residents work. This information indicates the following:

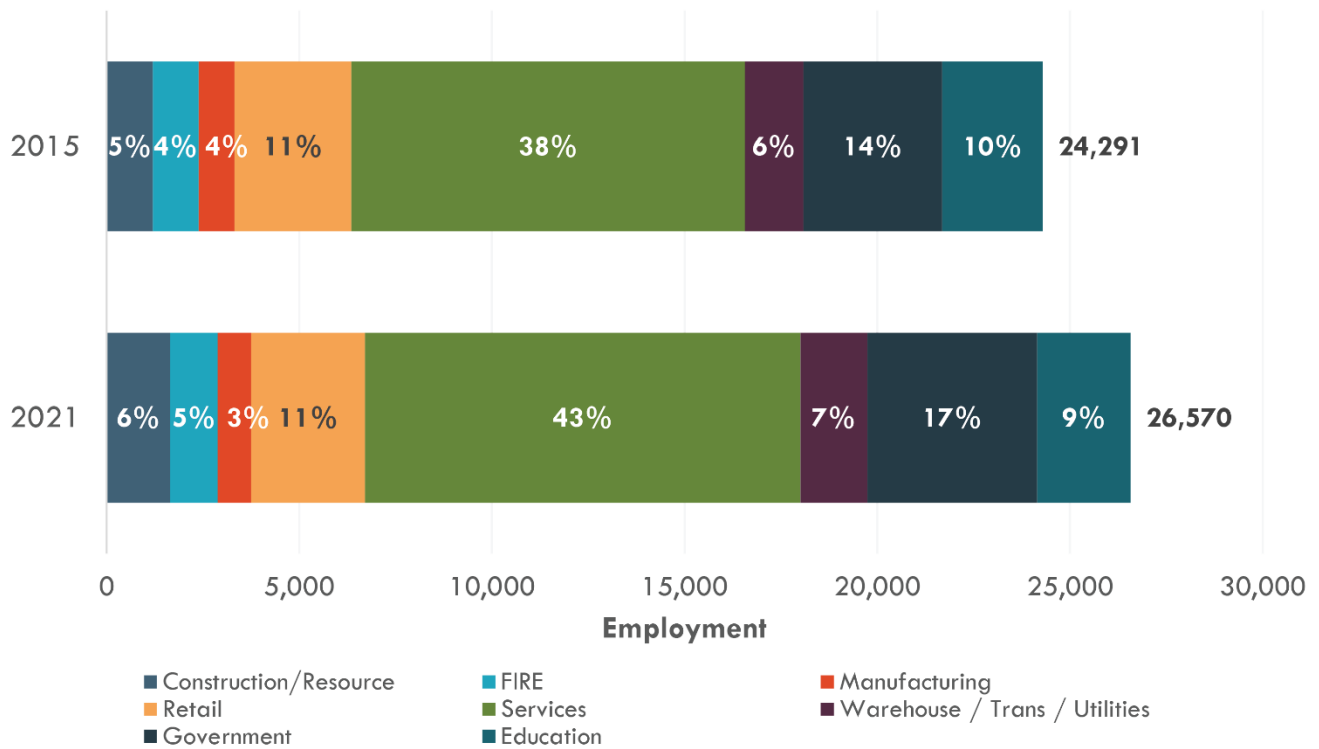
- **There has been significant local employment growth since 2014.** As shown in Exhibit 19, Lakewood experienced a decline in employment related to the recession in the late 2000s, with only 22,540 jobs in 2014. However, from 2014–2021, the City experienced employment growth of about 3.3% per year. The fastest growing major sectors have been Construction/Resource (10% per year), Warehousing/Transportation/Utilities (5.3%), and Government. (5.0%).The greatest addition overall has been to Services, accounting for 2,157 additional jobs and about 38% of the total jobs added.
- **Lakewood represents a location for regional employment.** About 87.2% of local workers commute into Lakewood from across the county and the Puget Sound region. The greatest proportion of Lakewood workers commute from Tacoma (17%), with a significant number coming from Parkland (4.2%), South Hill (3.8%) and University Place (3.5%).
- **14.5% of workers at their primary job reside in Lakewood.** This percentage has declined over time despite an increase to the actual number of jobs within the City (see Exhibit 16).
- **COVID-19 and its effects on employment patterns are still not fully understood.** While by Fall 2022 many jobs had transitioned back from remote to in-office, it is unclear how much commuting patterns and remote work opportunities will permanently change. Local and regional service jobs are also in flux, with long-term impacts from changes in economic systems still uncertain.

Exhibit 19. Lakewood Covered Employment, 2008–2021.



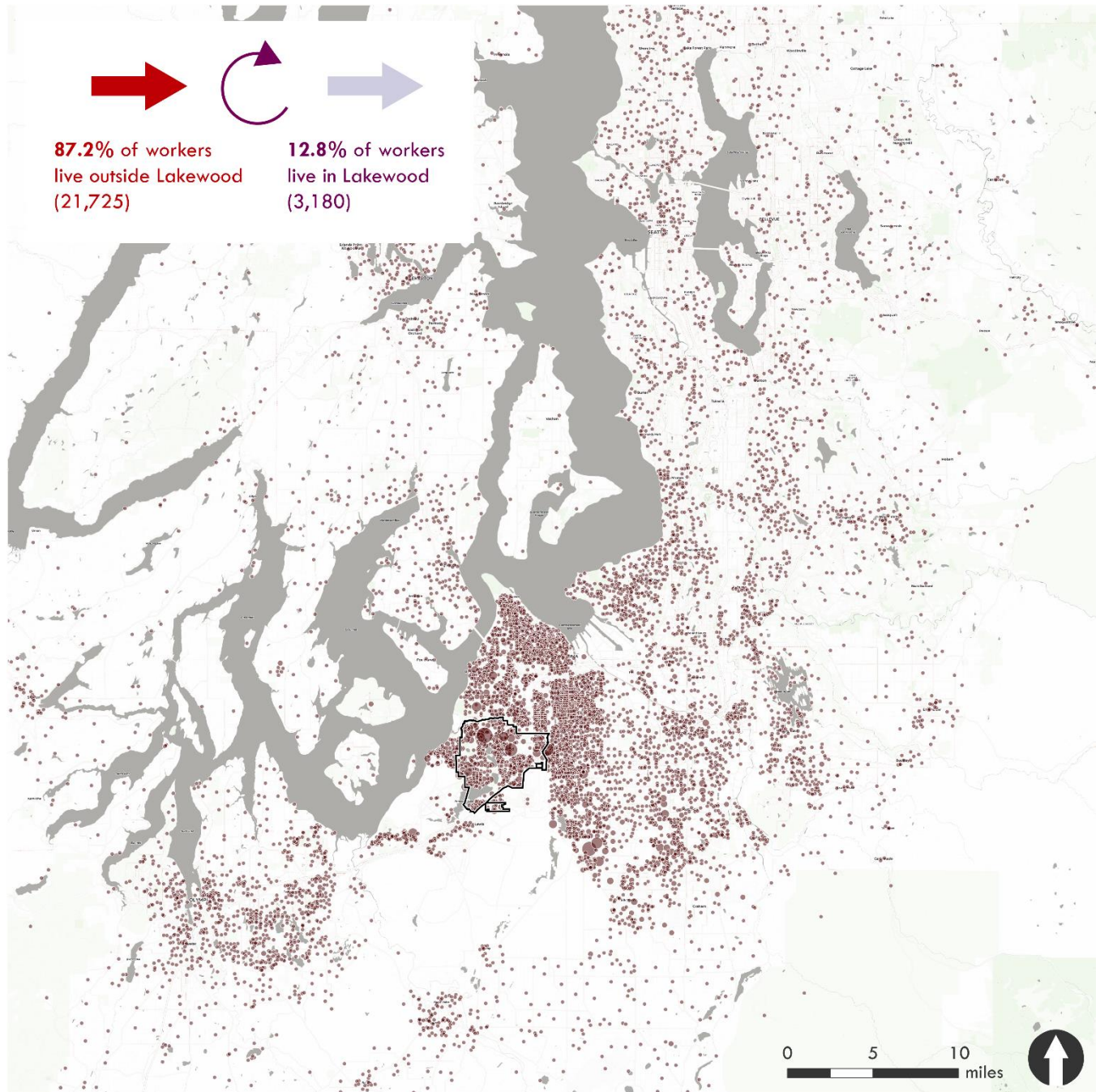
Sources: PSRC Covered Employment, 2022; BERK, 2022.

Exhibit 20. Lakewood Covered Employment by Major Sector, 2015 and 2021.



Source: PSRC Covered Employment, 2022; BERK, 2022.

Exhibit 21. Home Locations of Lakewood Workers (Primary Jobs), 2019.



Legend

- City of Lakewood
- Home locations of Lakewood workers

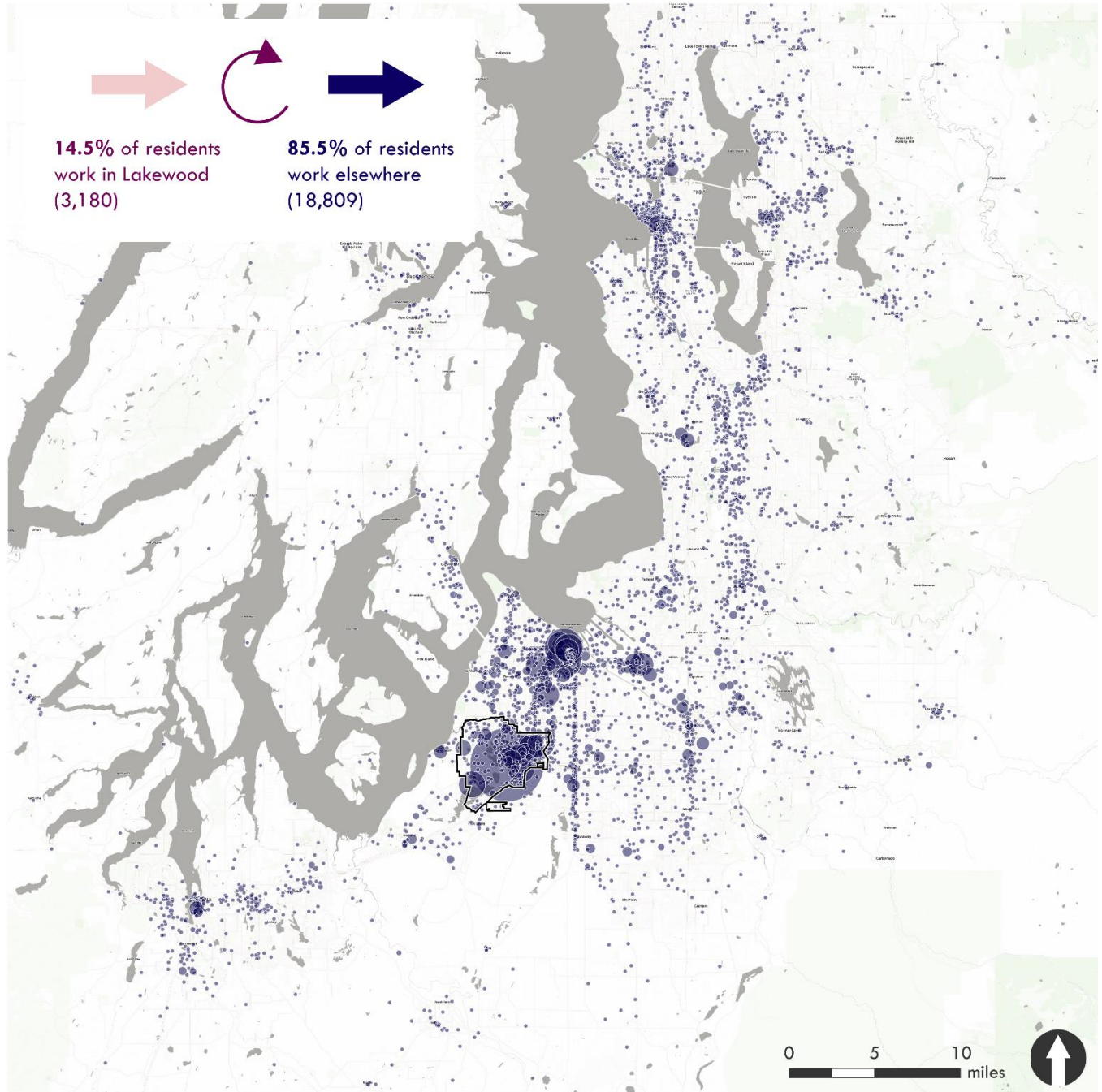
BERK
Map Date: August 2022

Top Home Locations for Lakewood Workers

Tacoma city, WA	16.5%	Spanaway CDP, WA	3.2%
Lakewood city, WA	12.8%	Puyallup city, WA	2.0%
Parkland CDP, WA	4.2%	Federal Way city, WA	1.9%
South Hill CDP, WA	3.8%	Frederickson CDP, WA	1.9%
University Place city, WA	3.5%	Graham CDP, WA	1.8%

Sources: US Census LEHD, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Exhibit 22. Work Locations of Lakewood Residents (Primary Jobs), 2019.



Legend

- City of Lakewood
- Work locations of Lakewood residents

Top Work Locations for Lakewood Residents

Tacoma city, WA	21.5%	Kent city, WA	2.6%
Lakewood city, WA	14.5%	Auburn city, WA	2.4%
Seattle city, WA	8.5%	Olympia city, WA	2.4%
Fife city, WA	3.2%	Bellevue city, WA	2.3%
Puyallup city, WA	3.1%	University Place city, WA	1.8%

Sources: US Census LEHD, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Housing Supply and Development

City zoning and capacity

Understanding where new development can be accommodated is an important part of developing effective housing policy. Under the [2021 Pierce County Buildable Lands Report](#), Lakewood had an identified capacity of 11,371 housing units as shown in Exhibit 23, including:

- 1,203 units on vacant multi-unit parcels.
- 226 units on vacant single-unit parcels.
- 8,889 units that could be accommodated on underutilized sites.
- 1,053 units in the development pipeline.

Current City policy regarding development can be found in the following maps:

- Exhibit 24 is the 2022 Comprehensive Plan **Future Land Use Map**. This highlights that much of the City can accommodate residential uses apart from areas with major park/institutional uses (e.g., Western State Hospital, Clover Park Technical College, Pierce College, and Fort Steilacoom), and the Air Corridor zones where new residential units are prohibited.
- Exhibit 25 shows **residential zoning** in the city, derived from a full map of zoning in the city. This highlights areas according to which types of residential land uses are allowed as of right: single-family, multifamily, and mixed-use.

These figures indicate the following:

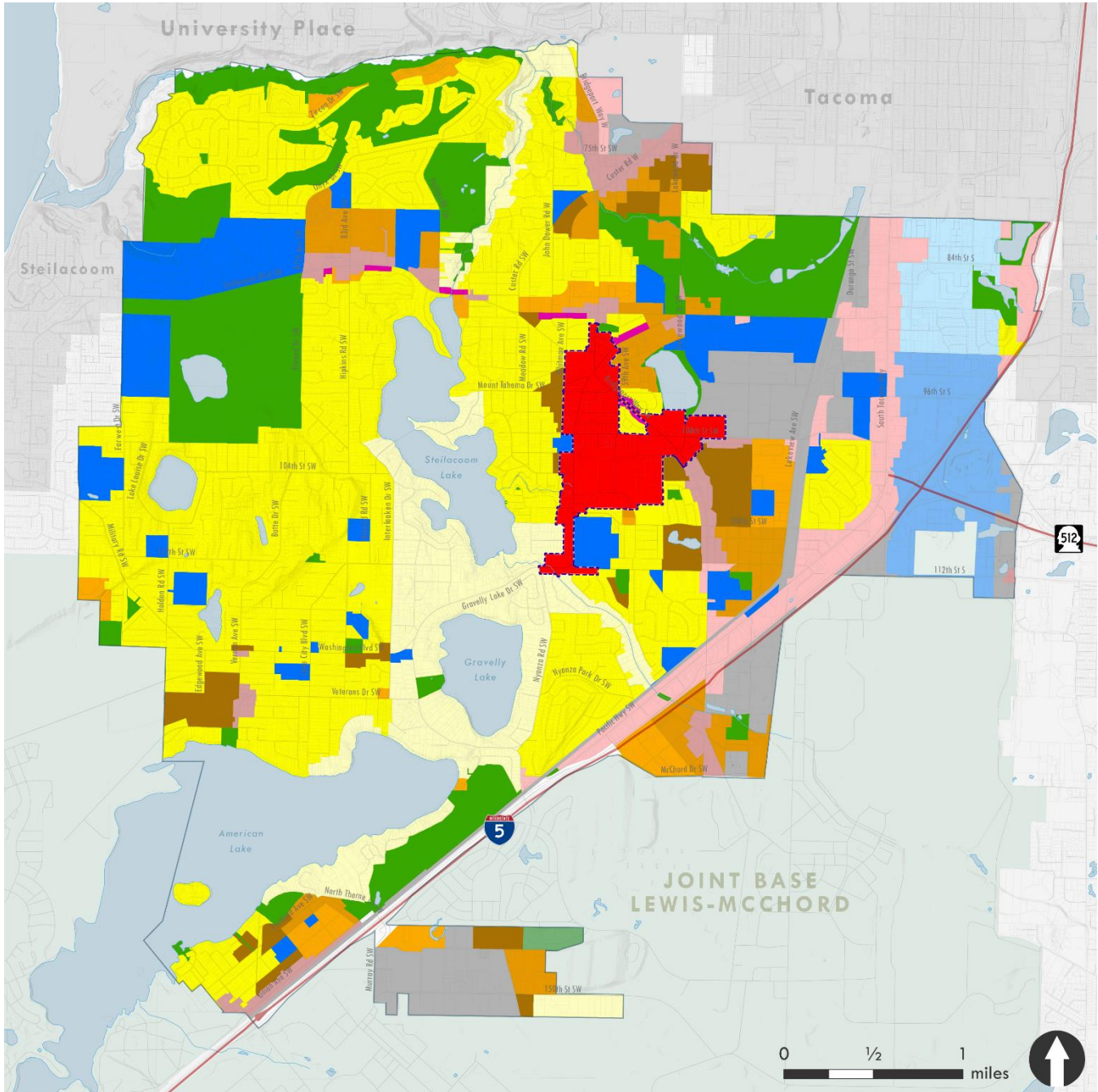
- **A substantive amount of future growth needs to be accommodated through infill development and redevelopment.** About 78% of the total growth capacity in Lakewood is found as “underutilized” sites as shown in Exhibit 23. Accommodating future growth will require significant redevelopment and infill as opposed to development of larger plats of single-family housing as in other areas of the county.
- **Similarly, most currently zoned capacity is in multifamily development.** Although half of the current housing inventory is in single-family detached housing (see Exhibit 27), only 14% of the total capacity is found in areas where single-family zoning is not a conditional use. This highlights that a major focus of future growth in the City will be on multifamily and mixed-use projects.

Exhibit 23. Lakewood Development Capacity, 2020–2044.

Zone	Vacant	Underutilized	Vacant Single Unit	Pipeline	Total
CBD	181	2,405	0	67	2,653
MF1	132	1,251	16	5	1,404
MF2	304	1,240	0	80	1,624
MF3	152	1,164	0	1	1,317
MR1	0	147	0	1	148
MR2	42	636	5	5	688
NC1	2	17	0	42	61
NC2	49	458	0	2	509
R1	7	26	17	1	51
R2	15	91	39	20	165
R3	172	739	91	34	1,036
R4	23	237	58	24	342
TOC	124	478	0	771	1,373
Total	1,203	8,889	226	1,053	11,371

Source: Pierce County, 2021.

Exhibit 24. Future Land Use, City of Lakewood Comprehensive Plan.



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water
- Regional Growth Center
- Highways
- Arterials
- Roads

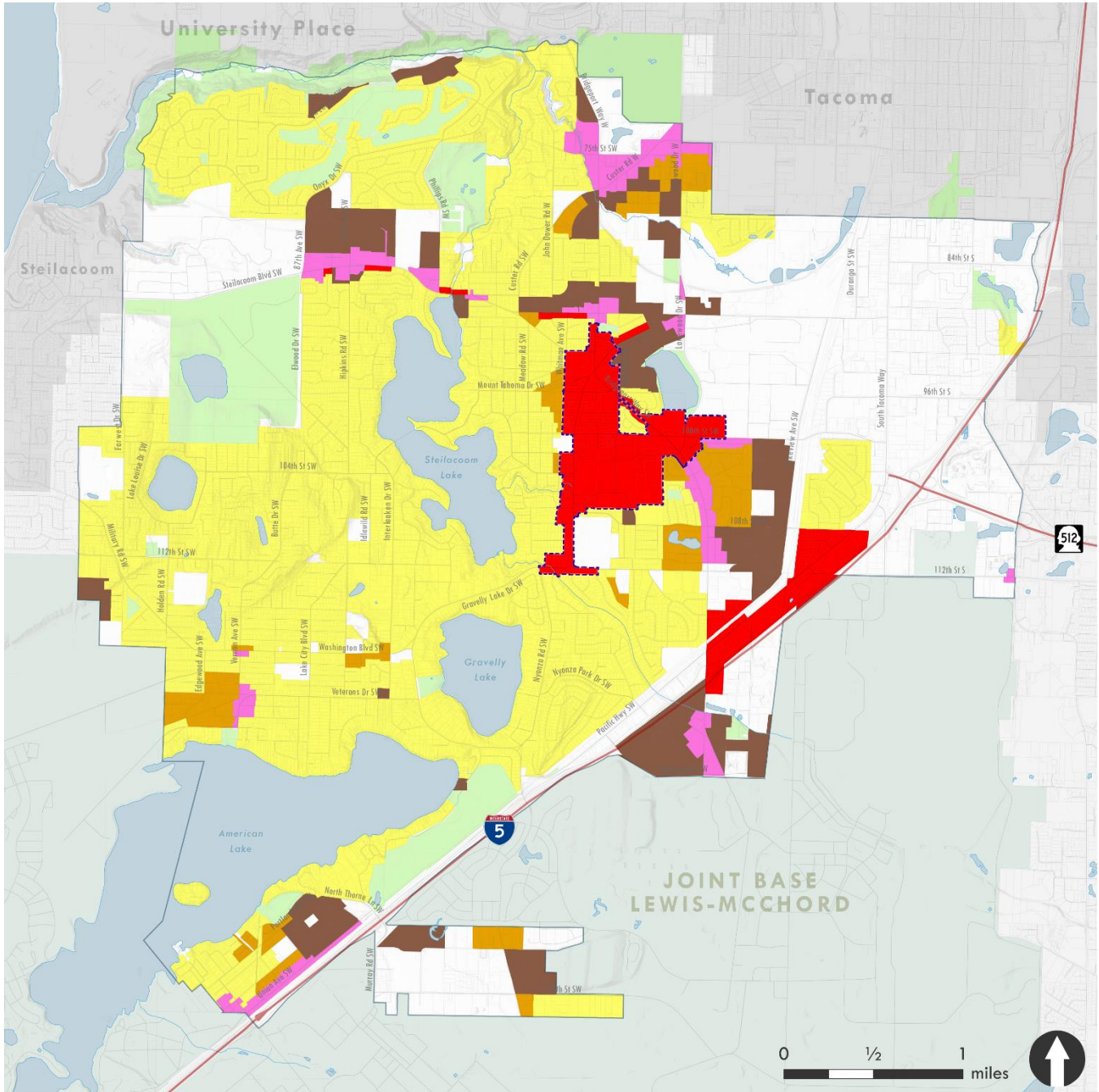
Future Land Use

- Air Corridor 1
- Air Corridor 2
- Arterial Corridor
- Downtown
- High-Density Multi Family
- Industrial
- Public & Semi-Public Institutional
- Multi-Family
- Military Lands
- Mixed Residential
- Neighborhood Business District
- Open Space & Recreation
- Residential Estate
- Single Family

BERK
Map Date: October 2022

Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Exhibit 25. Residential and Mixed-Use Zoning Categories, City of Lakewood.



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water
- Parks
- Regional Growth Center
- Highways
- Arterials
- Roads

Residential and Mixed-Use Zoning Categories

- Single-Family Residential
- Mixed Residential
- Multifamily
- Neighborhood Business
- Commercial (Mixed-Use)

BERK
Map Date: October 2022

Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Housing inventory and production

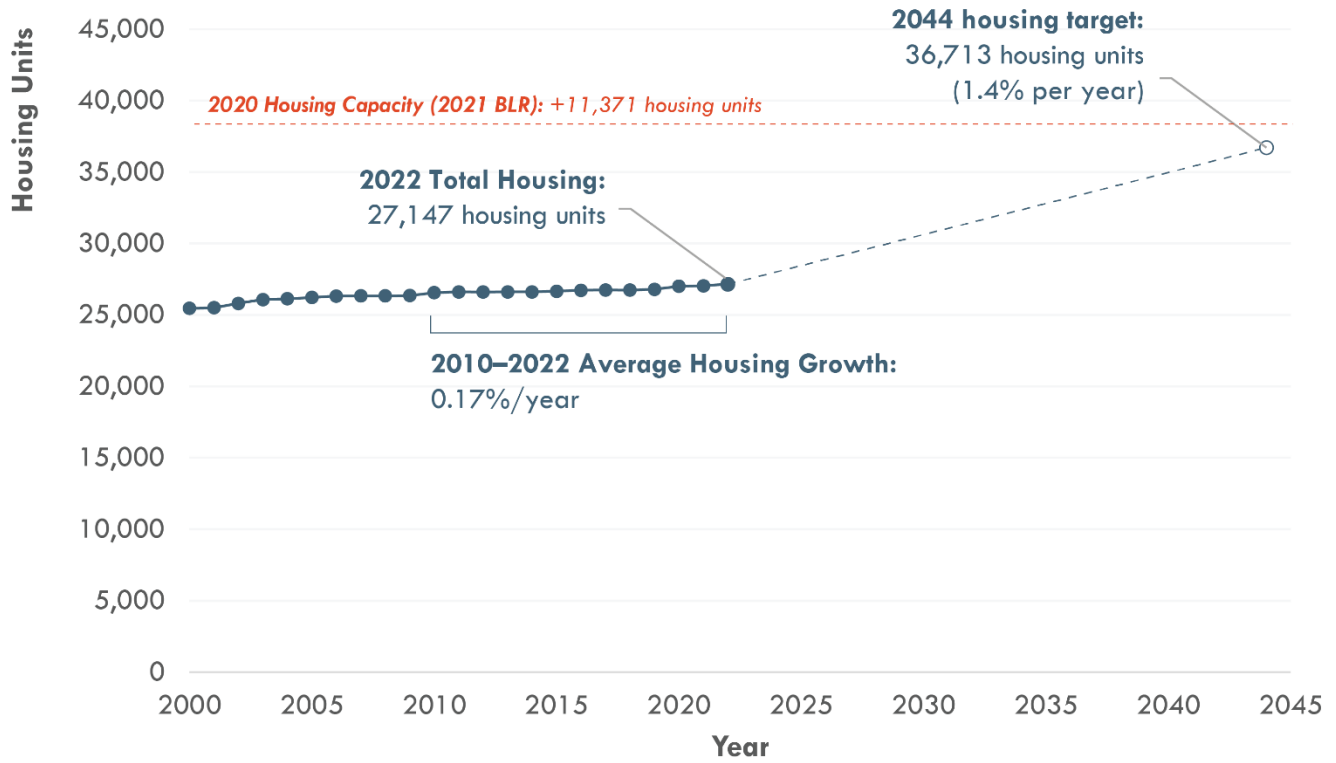
As of April 2022, the state Office of Financial Management estimated that Lakewood had a total of 27,147 housing units. Exhibits 26 through 32 provide perspectives on the current stock and production of housing in Lakewood. This includes:

- Historical trends for housing unit counts in Lakewood, together with existing capacity and current 2044 housing targets (Exhibit 26).
- Breakdowns of the proportion of current housing inventory by type as of 2020, and proportion of production over the previous 10 years (Exhibit 27).
- Housing production by type and year (Exhibit 28), total gains and losses (Exhibit 29), and net change by general type (Exhibit 30).
- Comparisons with other area communities by total housing (Exhibit 31) and proportions by type (Exhibit 32).

This information highlights the following:

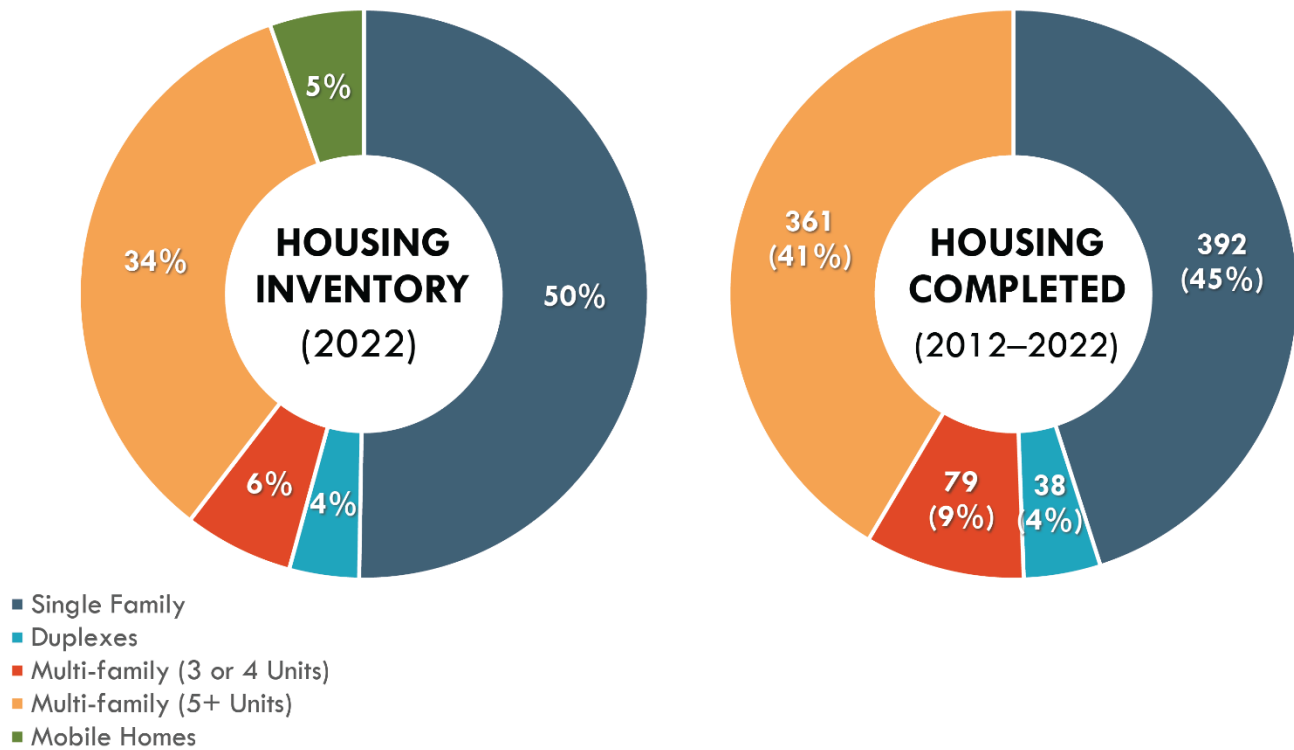
- **Net housing production in Lakewood since incorporation has been nominal.** Between 2010 and 2022, there has been only a very small net increase in the total amount of housing, with a net 0.17% increase per year, as shown in Exhibit 26. Note that this is substantively lower than the population growth rate provided in Exhibit 2, implying that a substantive amount of population increases have been accommodated through household size increases.
- **Future housing production can be accommodated to meet the City's growth targets, but the rate of development will have to increase significantly.** To meet Lakewood's the 2044 housing target of 36,713 housing units, there needs to be a substantive and sustainable increase in housing production over the next 20 years. An average of 435 units per year will be required, which is 73% higher than the peak recorded in 2020.
- **Lakewood has predominantly been building multifamily housing in the last ten years.** Lakewood has seen a net increase of housing production from 2010 to 2022 (see Exhibit 29 and Exhibit 30). Overall Lakewood has built 870 units, predominantly multifamily from 2012–2022.
- **Lakewood has recently had a greater amount of attached and multifamily development than many comparable communities.** Exhibits 31 and 32 highlight the differences between housing production from 2011 to 2020 by type between Lakewood and area communities (Federal Way, Puyallup, University Place, and Fife). Of all of these communities, only Federal Way has had a lower percentage of their total housing production as single-family detached homes. A significantly larger percentage of local development in Lakewood has also been developed as duplexes, triplexes, and fourplexes, consisting nearly 13% of the total development in the community.

Exhibit 26. Housing Unit Counts and 2044 Housing Target.



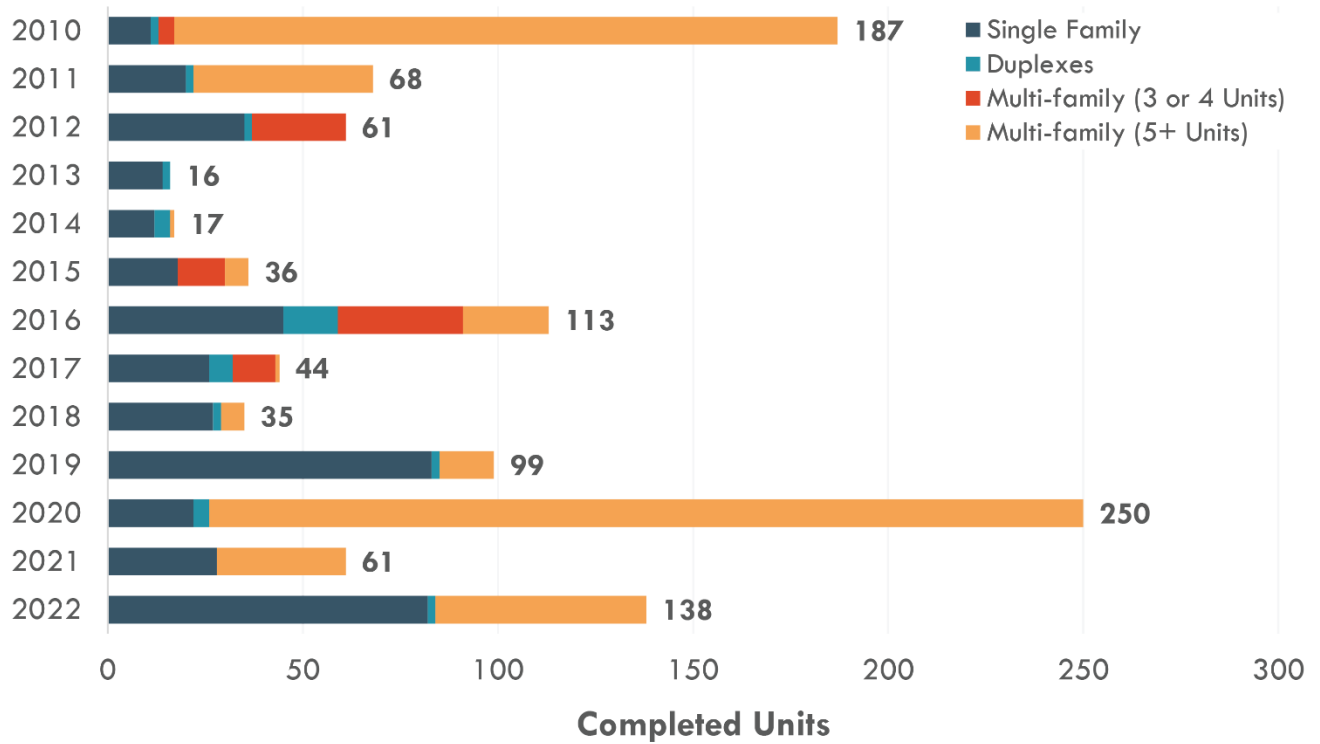
Source: OFM, 2022; BERK, 2022.

Exhibit 27. 2020 Housing Inventory and 2011–2020 Housing Production, by Type.



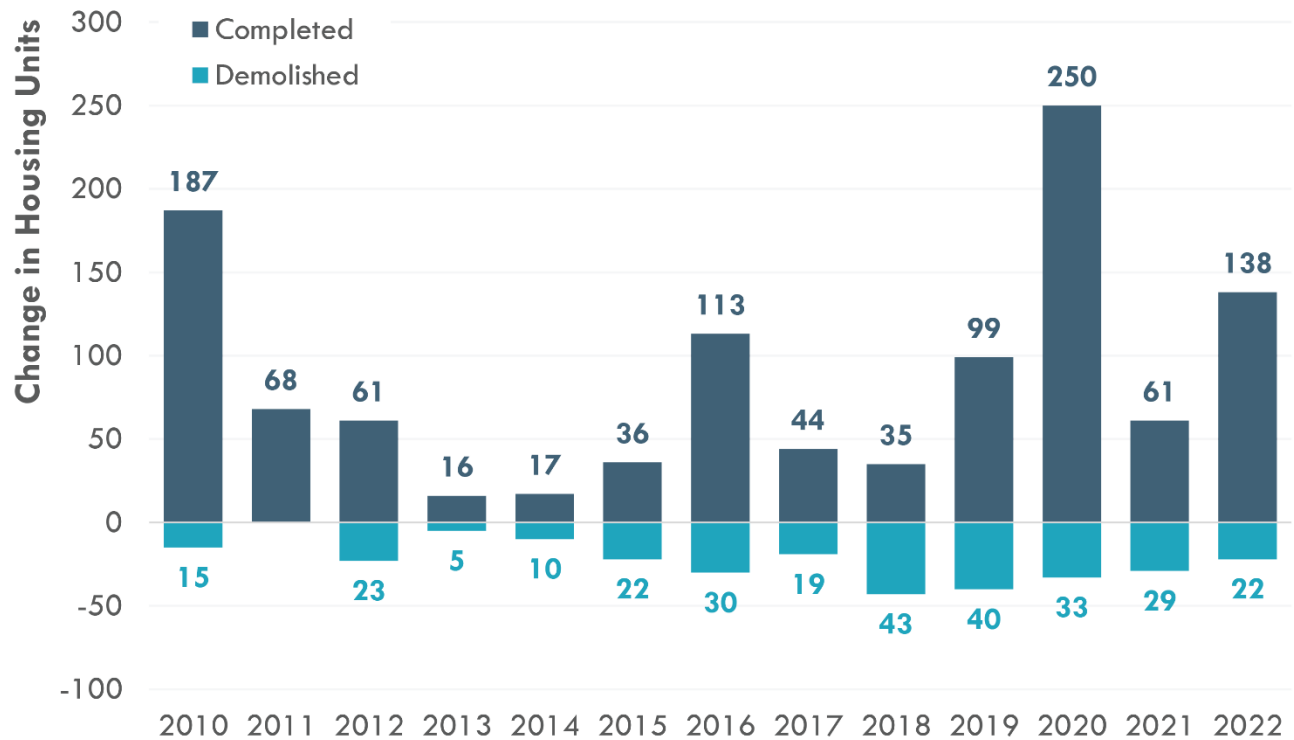
Source: OFM, 2022; BERK, 2022.

Exhibit 28. Housing Production, by Type and Year, 2010–2022.



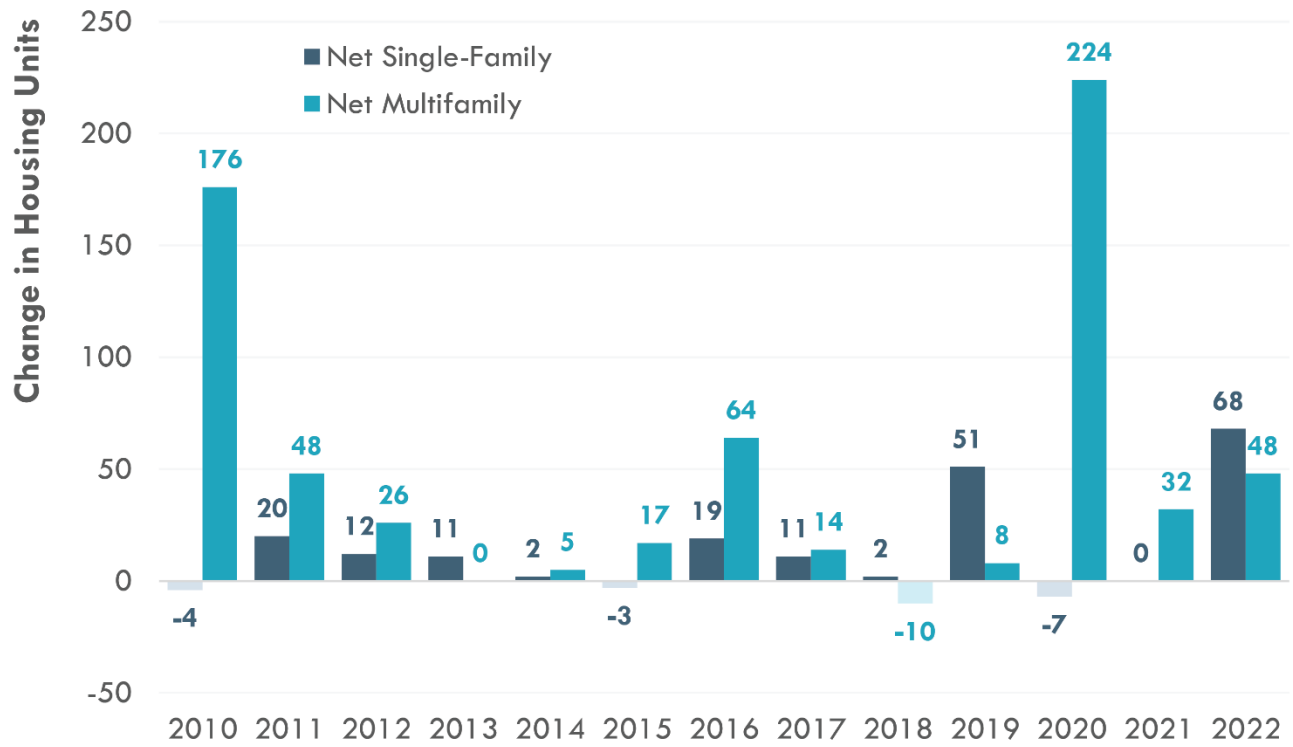
Source: OFM, 2022; BERK, 2022.

Exhibit 29. Housing Production, Gains and Losses, 2011–2020.



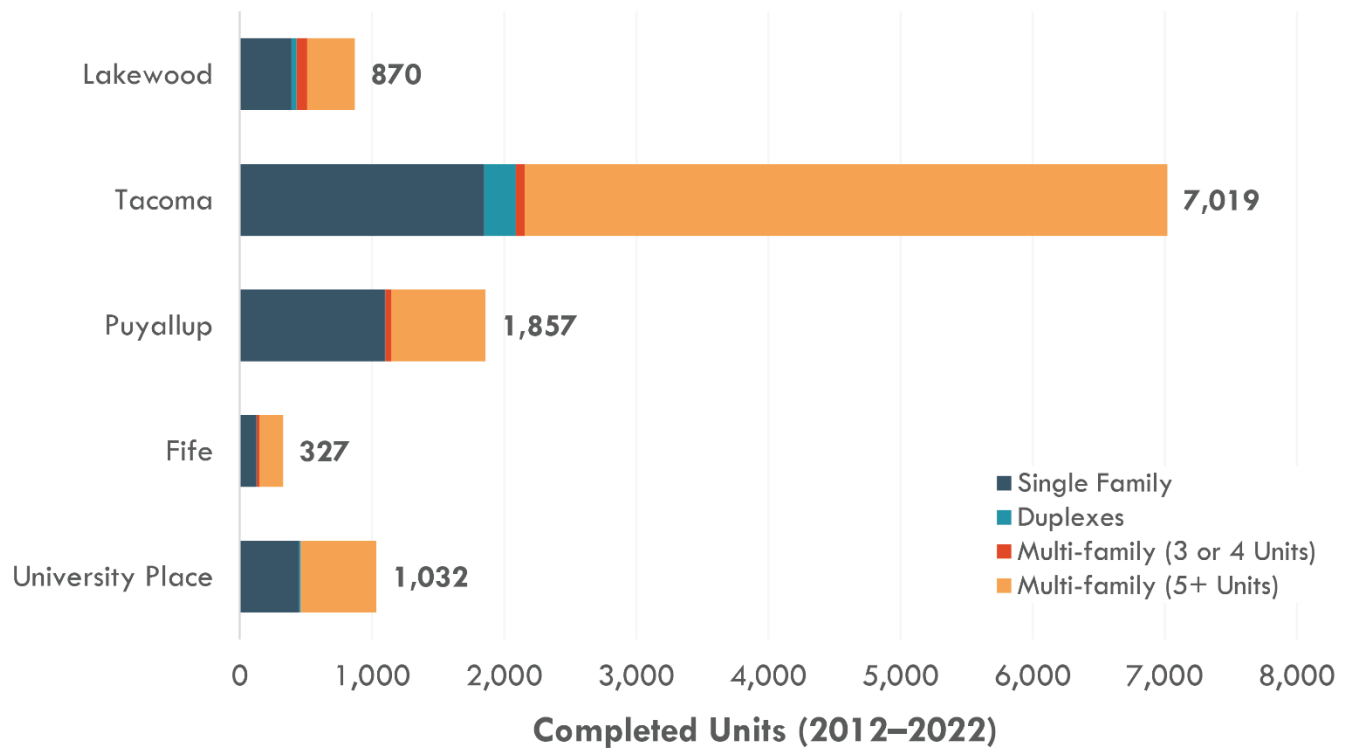
Source: OFM, 2022; BERK, 2022.

Exhibit 30. Housing Production, Net Change, 2010–2022.



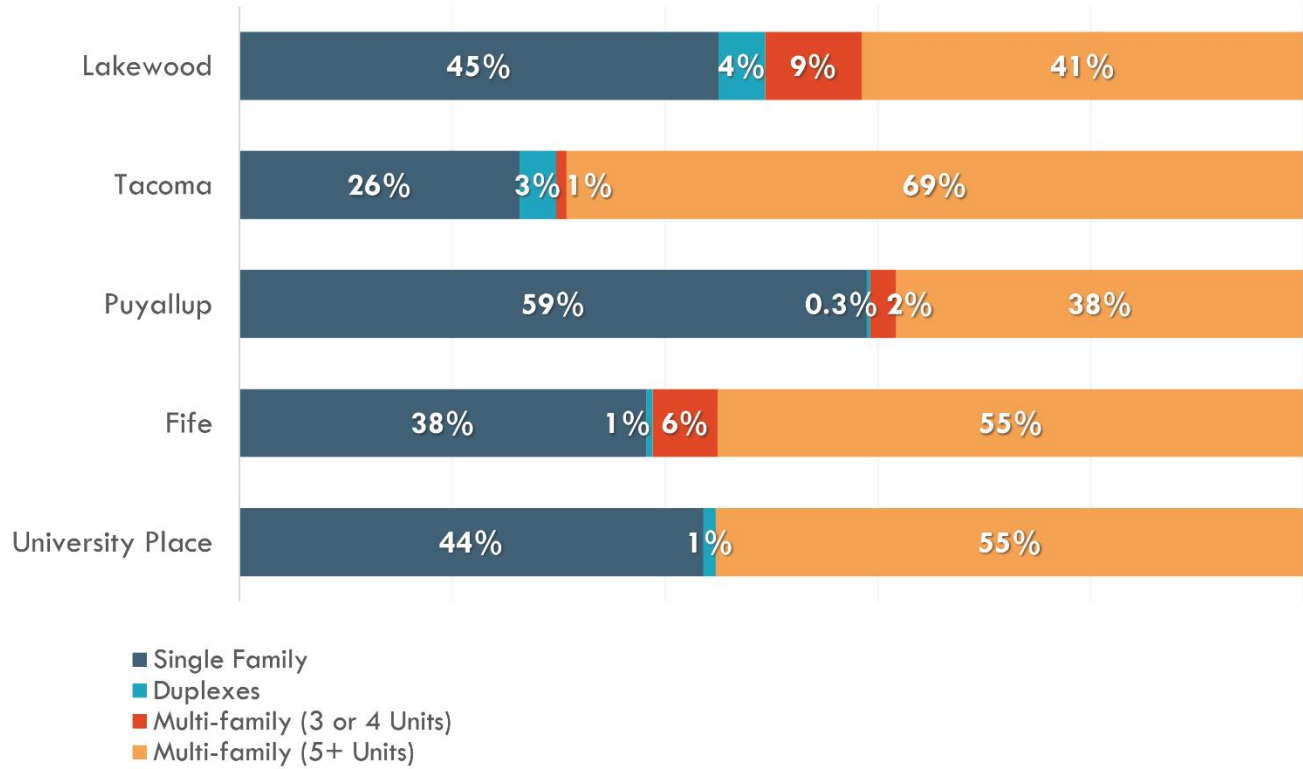
Source: OFM, 2022; BERK, 2022.

Exhibit 31. Total Housing Production Comparison, by Type, 2012–2022.



Source: OFM, 2022; BERK, 2022.

Exhibit 32. Proportion of Housing Production Comparison, by Type, 2011–2020.



Source: OFM, 2022; BERK, 2022.

Housing Market Trends

Rental housing

Understanding housing costs and related indicators can be important in determining key characteristics of housing needs. The following exhibits highlight major characteristics of the rental market:

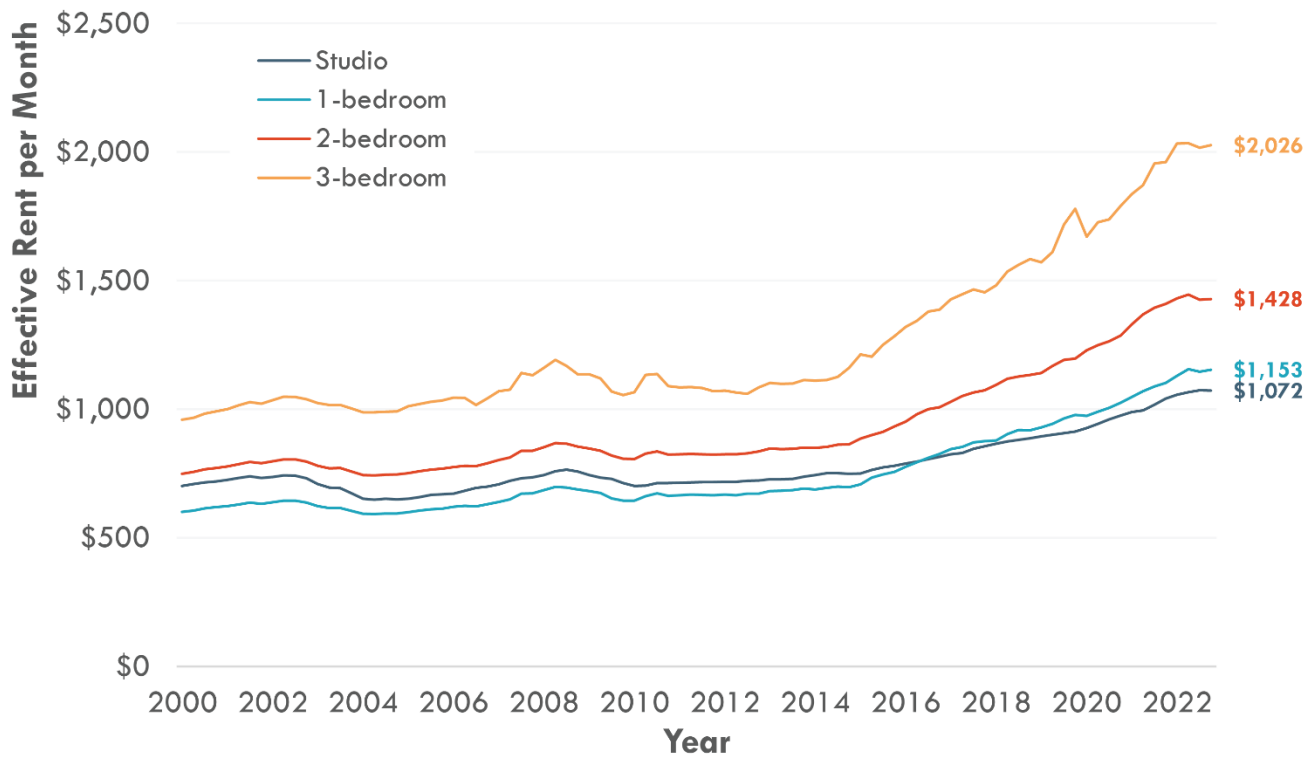
- Exhibit 33 provides a description of **effective rents by the size of rental units** from 2000–2022. Note that in this case, “effective rents” incorporate the asking rent for units as well as any concessions (e.g., free rent, free parking, etc.).
- Exhibit 34 provides the **ratio of effective rent to median family income** for Lakewood from 2010–2022 by size of unit. Note that median income information is not available for 2021 and 2022, but was projected from the previous three years based on methods established by the US Department of Housing and Urban Development. This can highlight changes in effective affordability over time.
- Exhibit 35 shows **year-over-year changes in rent** for Lakewood and the Seattle-area market (King, Pierce, and Snohomish Counties) for 2001–2022, but does not fully reflect changes in rent during and after the COVID-19 pandemic rent moratoria.
- Multifamily housing **rental vacancy rates** for Lakewood and the Seattle-area market are provided in Exhibit 36.
- To understand the sales of rental properties, Exhibit 37 includes the **volume of sales** in Lakewood in millions of dollars, and the **average sale prices per unit** in thousands of dollars.

From these assessments, the following conclusions can be reached:

- **Rent amounts have experienced a notable increase since 2014.** As can be seen in Exhibit 33, rents in Lakewood have been experiencing considerable upward pressure since 2014. While these increases have differed by the size of the units in question, Exhibit 35 highlights that in general rents have been increasing by at least 5% per year, even during periods where rents in the overall market have decreased year-over-year.
- **Rental affordability has also declined since 2014.** Exhibit 34 shows comparisons between rents and local median income. While the 2010–2014 period demonstrated some stability where median rents for studios to two-bedroom apartments were considered affordable to households with income at 60–65% MFI, this has increased to 75% MFI for studios to 85% for two-bedrooms. With projections of median income, this has increased further to 88–101% in 2021, and 82–93% in 2022. Three-bedroom unit rents increased to 115% of MFI in 2022.
- **Local vacancy rates have been trending lower than regional rates since 2015.** The historical vacancy rates shown in Exhibit 36 highlight that before 2014–2015, vacancy rates in Lakewood have generally been higher than regional vacancy rates overall. However, over the past five to six years, vacancy rates in the broader market have been higher than in Lakewood, suggesting that there may be higher local pressure on prices in the local market.
- **Sales of multifamily housing suggest a greater involvement by institutional investors.** The increase in sales volume and sale prices for multifamily housing in Exhibit 37 has been notable since 2016. While this can be attributed in general to the increasing attractiveness of multifamily housing

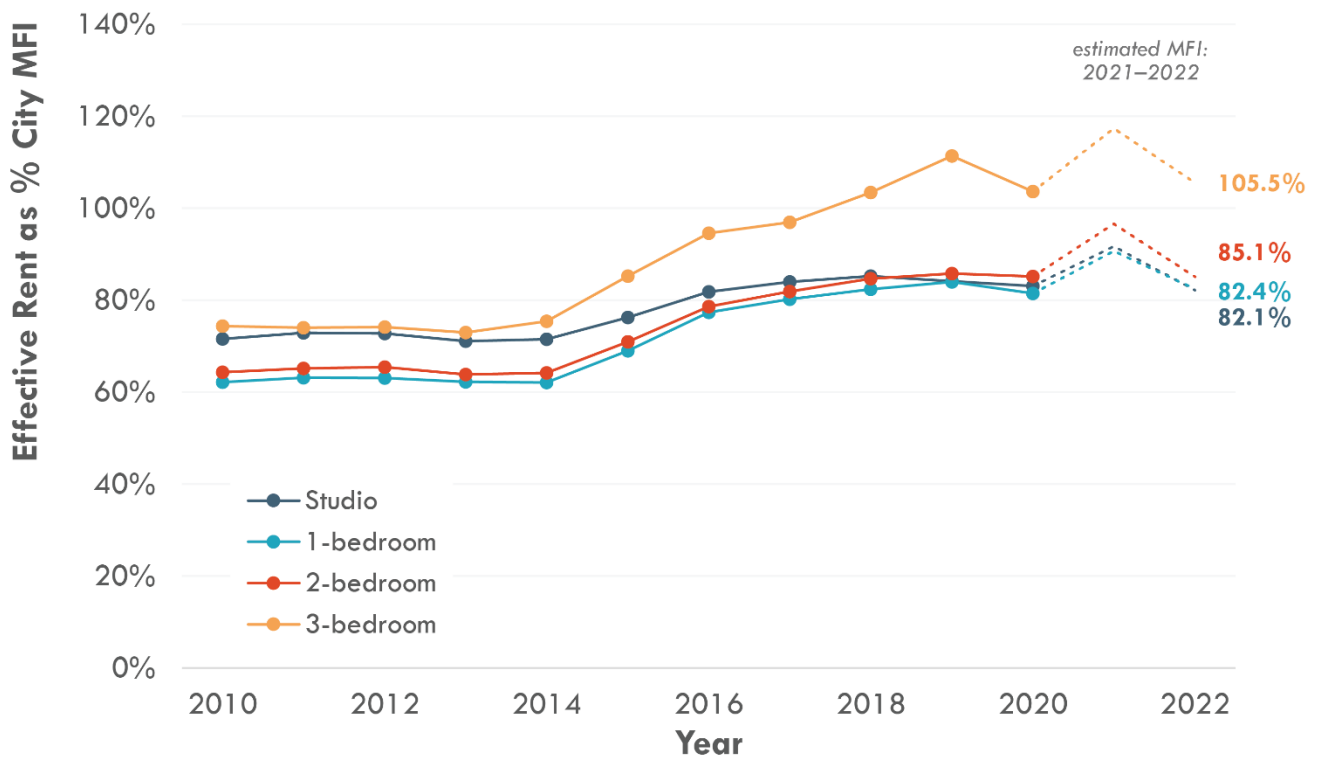
to investors in general, there has been a general increase in sales from private to institutional investors. This may be due in part to the fact that the City's rental housing safety program has prompted the sale of multifamily housing by owners unwilling to make required improvements to their property.

Exhibit 33. Effective Rents by Unit Size, 2001–2022.



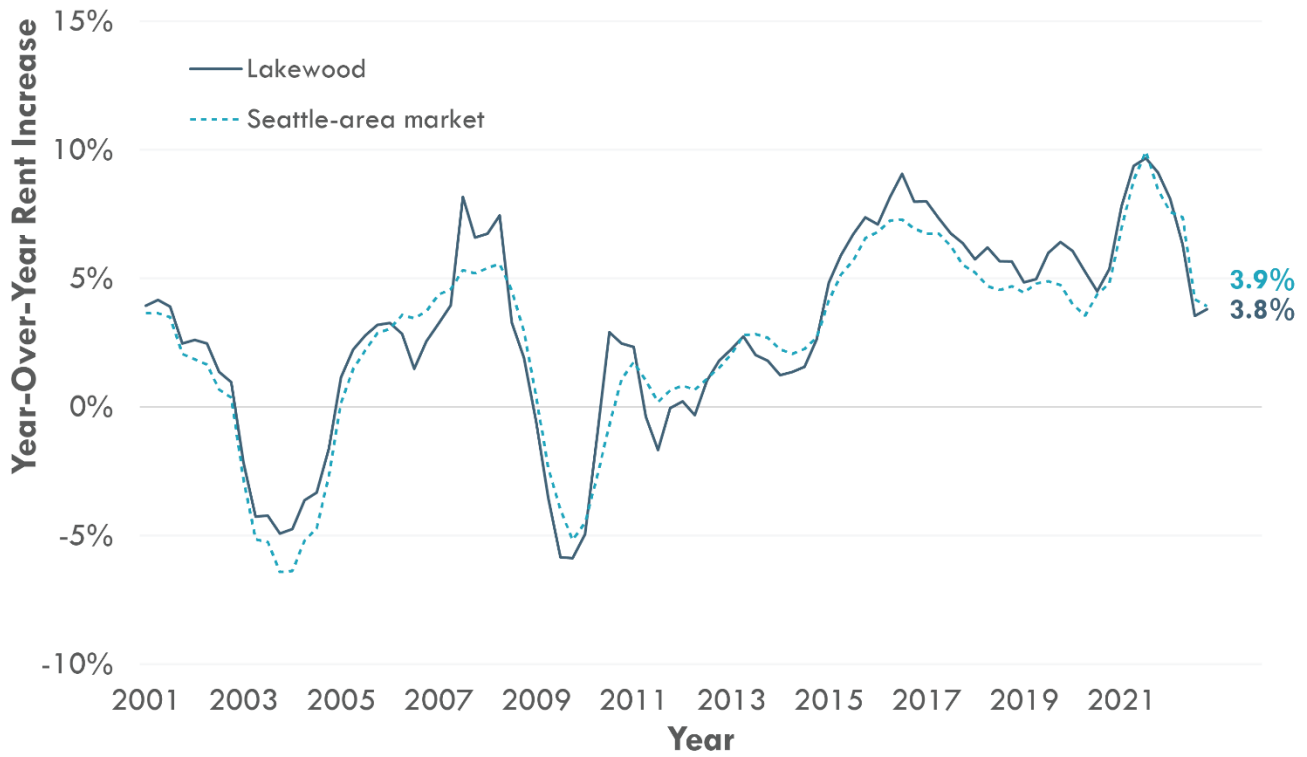
Source: CoStar, 2022; BERK, 2022.

Exhibit 34. Effective Rent as Percent Lakewood Median Income by Size, 2010–2022.



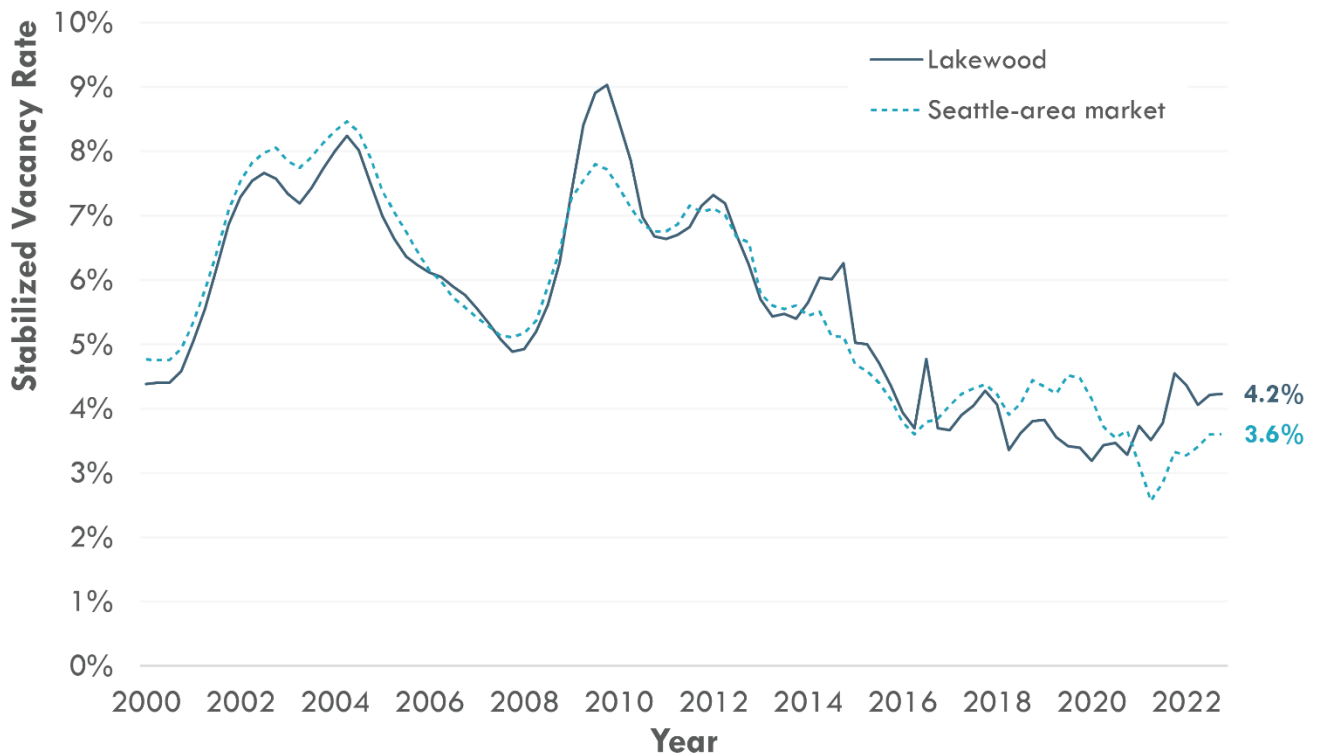
Source: CoStar, 2022; ACS 2022; BERK, 2022.

Exhibit 35. Year-Over-Year Rent Changes, Lakewood and Region, 2001–2022.



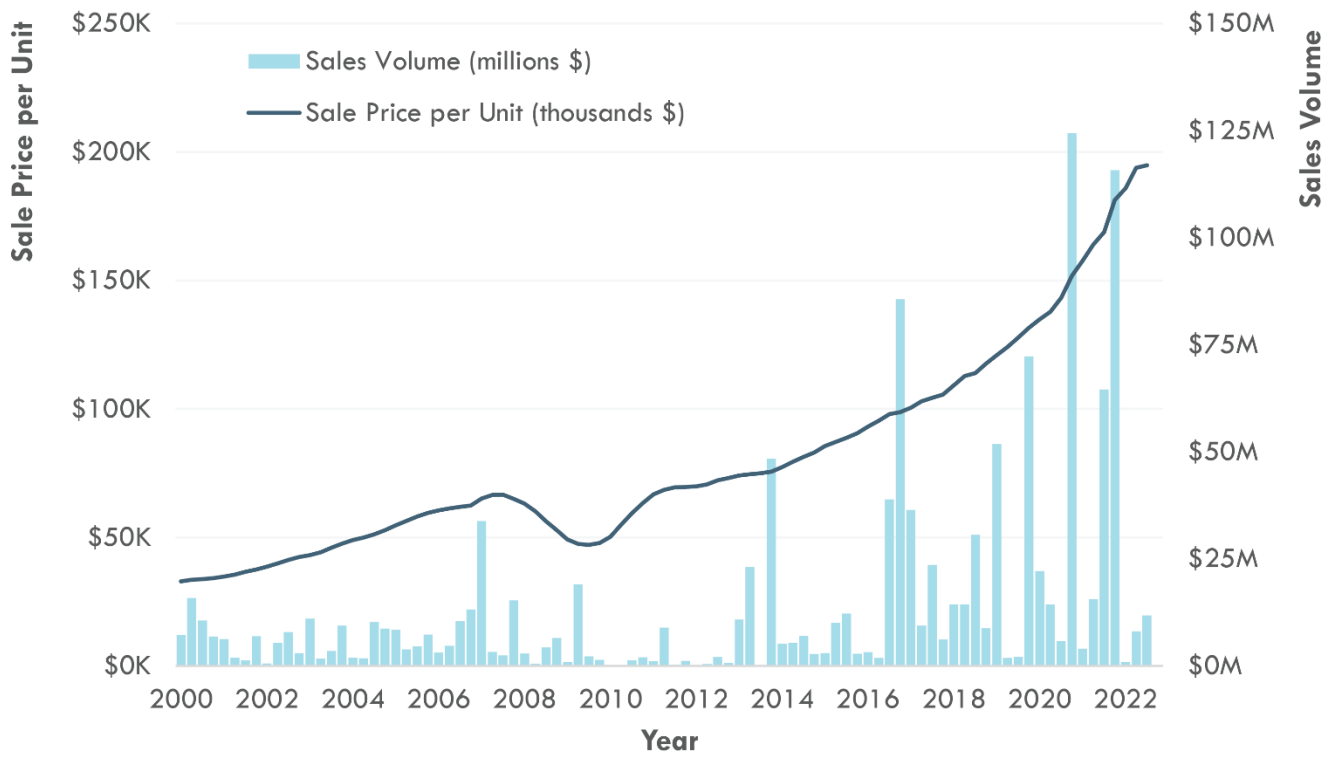
Source: CoStar, 2022; BERK, 2022.

Exhibit 36. Vacancy Rates, Lakewood and Region, 2000–2022.



Source: CoStar, 2022; BERK, 2022.

Exhibit 37. Sales Volume and Sale Price per Unit for Rental Properties, 2000–2022.



Source: CoStar, 2022; BERK, 2022.

Owner-occupied housing

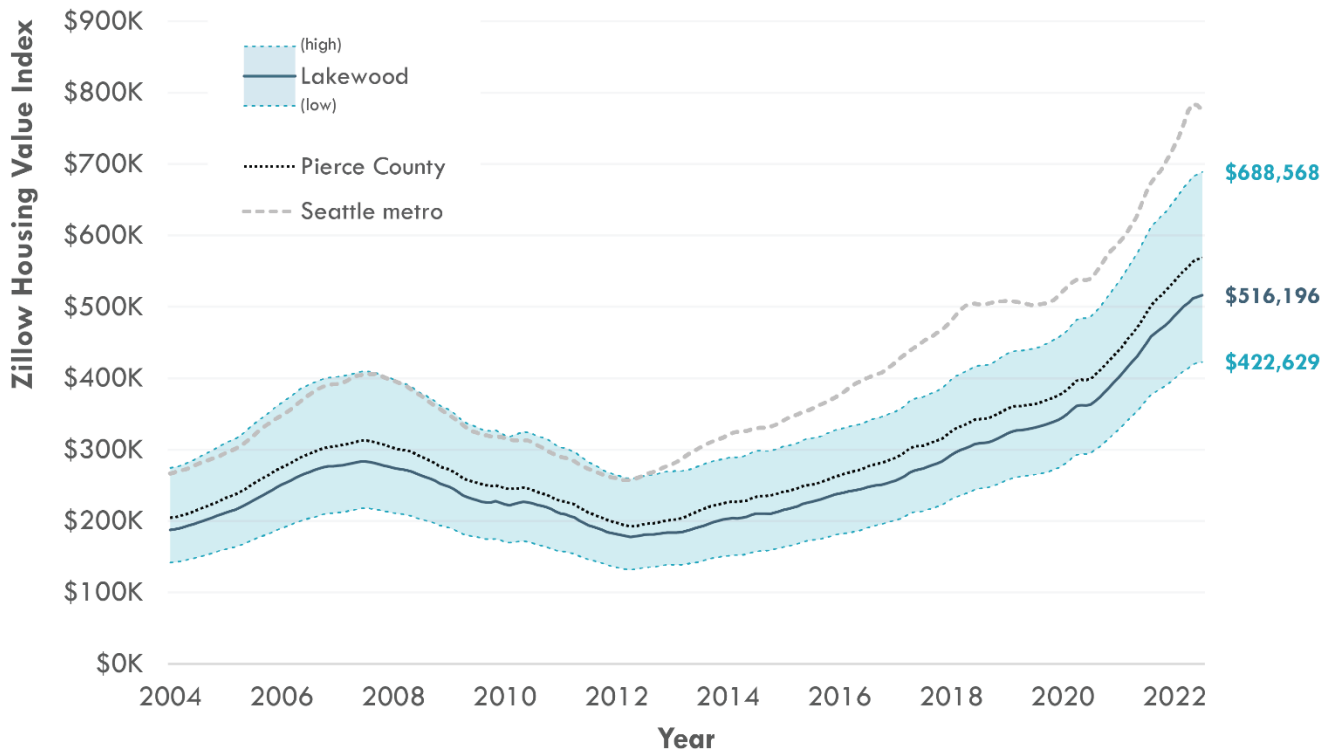
Information about owner-occupied housing can be useful in highlighting other potential market trends that can impact affordability. Zillow Group, Inc. provides summaries of key metrics at the metro, county, and city level.

- Exhibit 38 highlights **housing price distributions** based on the “Zillow Housing Value Index” (ZHVI). This includes the median and range of housing prices for Lakewood in blue, as well as the median housing prices for Pierce County and the Seattle metro area.
- Comparable to the measures provided for rental housing, Exhibit 39 provides **ratios of median housing prices (ZHVI) and median family income** for Lakewood and Pierce County. As with the rent measure, this can highlight effective changes in housing affordability over time. As with the rental calculations in Exhibit 34, median incomes are projected for 2021 and 2022.

These data highlight the following:

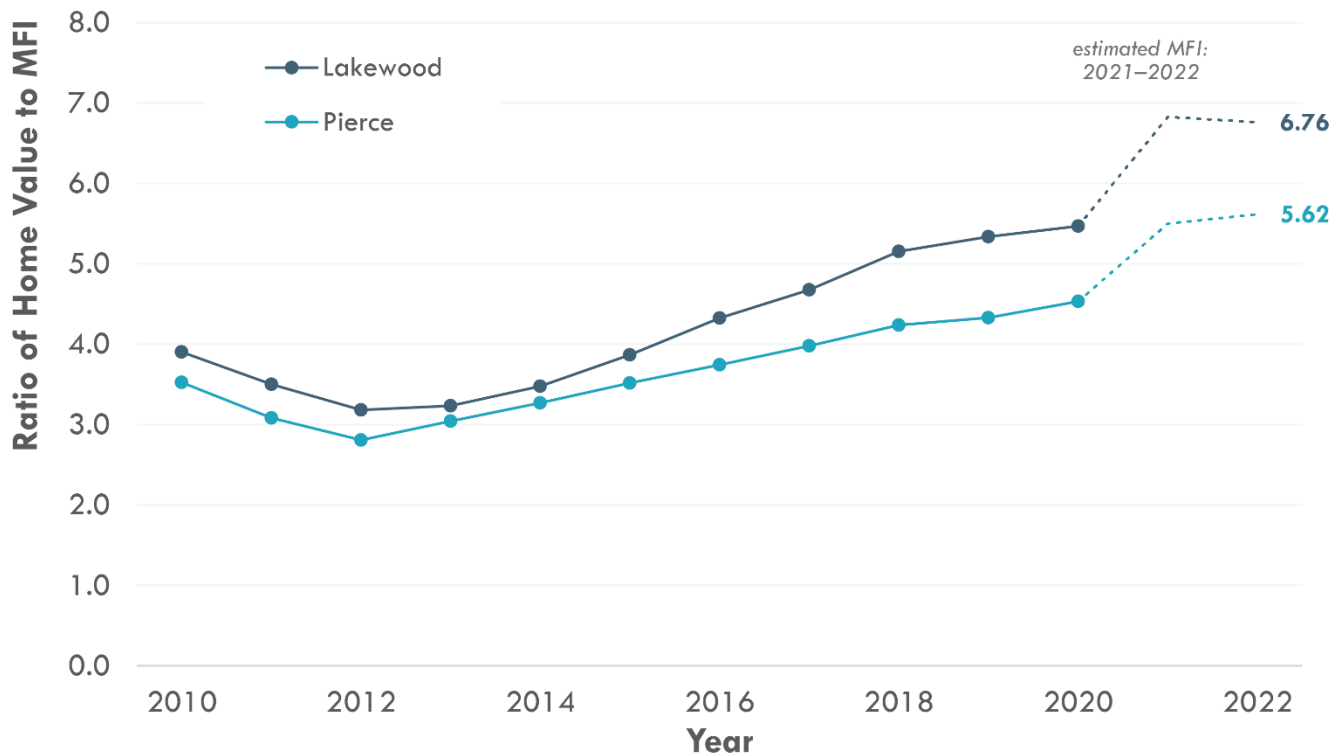
- **The Lakewood market is more affordable than others in the region, but has been experiencing considerable recent increases.** The data in Exhibit 38 highlights that median prices for housing in Lakewood have increased from \$178,297 in April 2014 to a recent peak of \$516,196 in July 2022. This represents an increase of 190% from this market low over the past eight years, and is about 8.3% lower than Pierce County and 34% lower than the broader Seattle metro region. While Lakewood may present a more affordable option on average, national and regional increases in prices have also impacted the local market.
- **While owned-occupied housing is more affordable in Lakewood, this affordability is also declining.** The comparisons between median income and median owner-occupied housing prices in Exhibit 39 highlight two major points. First, Pierce County is less affordable than Lakewood on average; the 2022 median housing price estimated ratio for Pierce County being 7.33 versus 5.94 for Lakewood. However, in both cases, there has been a consistent increase in this ratio over time from a low in 2012, meaning housing becoming less accessible to households since the end of the previous recession.

Exhibit 38. Home Value, Lakewood, Pierce County, and Seattle metro region, 2004–2022.



Source: Zillow, 2022; ACS 2022; BERK, 2022.

Exhibit 39. Ratio of Home Value to Median Income, Lakewood and Pierce County, 2010–2022.



Source: Zillow, 2022; ACS 2022; BERK, 2022.

Housing Affordability

Household cost burden

When trying to evaluate the combination of market supply and demand factors and their impacts on households in the community, it is important to assess housing costs as compared to income. Under current metrics, the US Department of Housing and Urban Development (HUD) provides two general thresholds for “housing cost burdens”:

- If households are paying at least 30% of their income on housing and housing-related costs (e.g., utilities), they are considered to be **cost burdened**. This assumes that the costs of housing will start to crowd out other household expenditures, especially for lower-income households.
- Households that are paying at least 50% of their income on housing are considered **severely cost burdened**. In these cases, lower-income households may experience some severe impacts on other necessary expenditures. They may also be more at risk for housing insecurity, especially if housing rent increases may outpace increases in household income.

A major focus in this section is on rental housing versus owner-occupied housing. Many households have investment wealth in their owned home; in other cases, lower income households own their home outright but are unable to utilize its value for living costs for whatever reason. Overall, Lakewood’s renters are increasingly challenged both with rising rents and with finding the means to become homeowners (i.e., gathering down payment.)

The following exhibits highlight key calculations from the HUD CHAS dataset, which is derived from American Community Survey data:

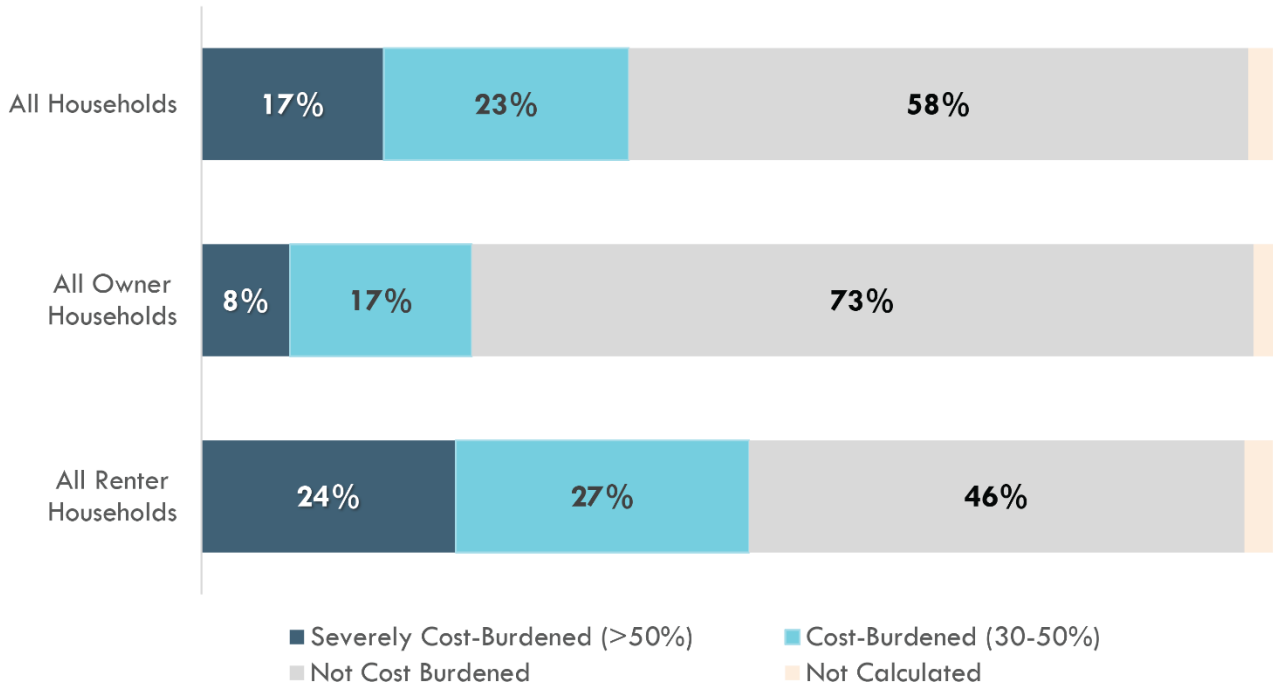
- Exhibit 40 compares the proportion of cost burdened and severely cost burdened households in Lakewood between renters and owners.
- Exhibits 41 and 42 provide a breakdown of renter cost burden by income categories in Lakewood, with Exhibit 41 providing proportions of each category and Exhibit 42 giving total counts.
- Rent cost burdens are broken down by race and ethnicity in Exhibits 43 (proportions) and 44 (total counts) to highlight potential racial disparities.

Based on these statistics, the following conclusions can be reached:

- **About half of all households renting in Lakewood are facing cost burdens.** Exhibit 40 shows that about 50% of all renter households are facing some type of housing cost burden. This stands in contrast to homeowners, where 26% face housing cost burdens of some type, and 9% face severe housing cost burdens. This highlights that affordability is a much more immediate consideration with renters, especially lower-income renters in the community.
- **Lower-income households are experiencing considerable cost burdens.** In examining Exhibits 41 and 42, where renter cost burdens are split according to household income, it is apparent that the greatest cost burdens are being experienced by very low- (30–50% MFI) and extremely low-income (less than 30% MFI) households. Only 7% and 3% of these households, respectively, are not cost burdened.

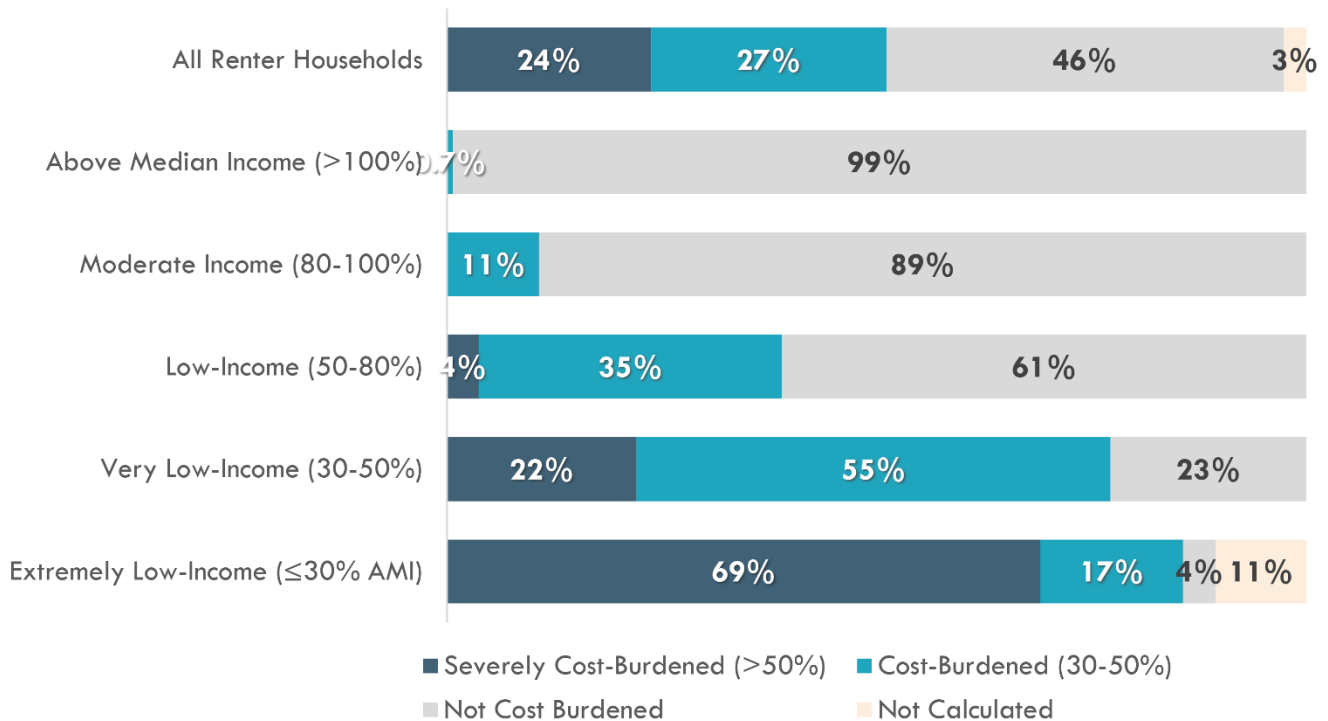
- **Black/African-American households that are renting are experiencing greater housing cost burdens in Lakewood.** Exhibits 43 and 44 demonstrate that Black or African American renter households have higher rates of being severely cost burdened (40%) as compared to renter households from other racial and ethnic groups. Overall, 58% of renting Black households are facing cost burdens versus 54% of white households. This racial disparity needs to be addressed as the City develops new housing goals and policies.

Exhibit 40. Percent of Households by Tenure and Cost Burden, 2018.



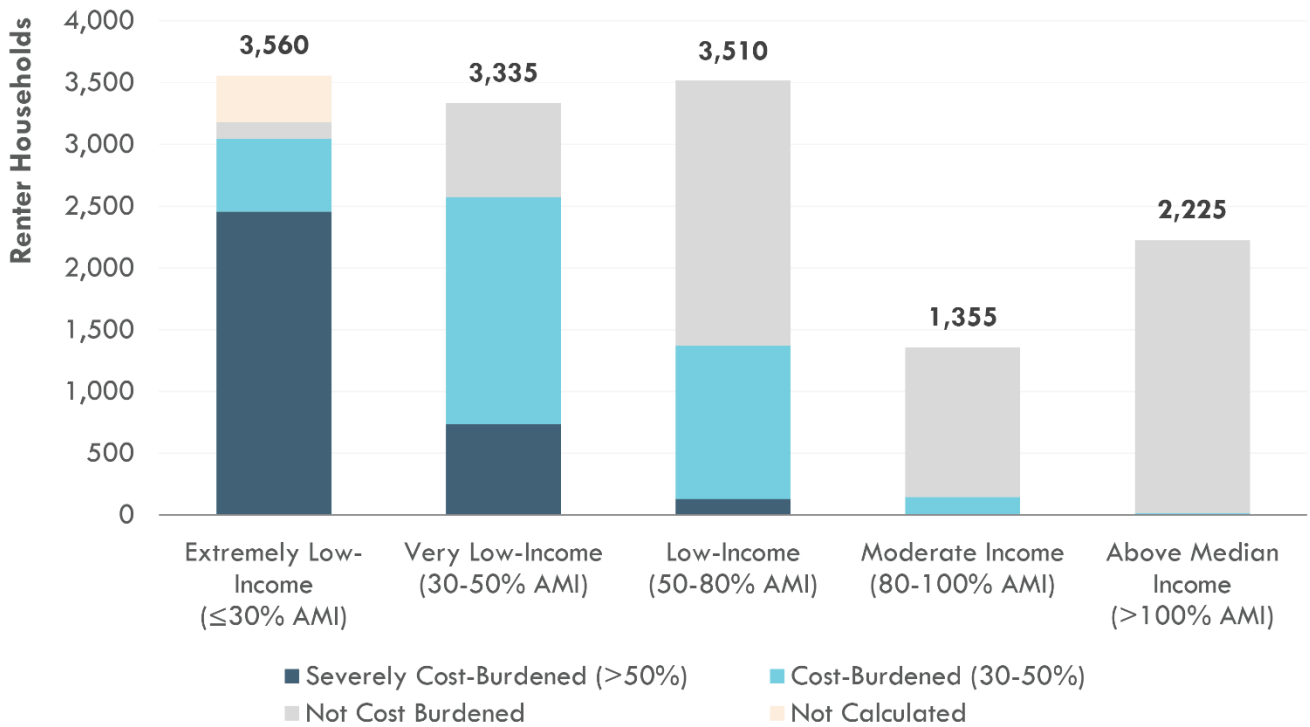
Source: 2018 CHAS; BERK, 2022.

Exhibit 41. Proportion of Renter Households by Income Category and Cost Burden, 2018.



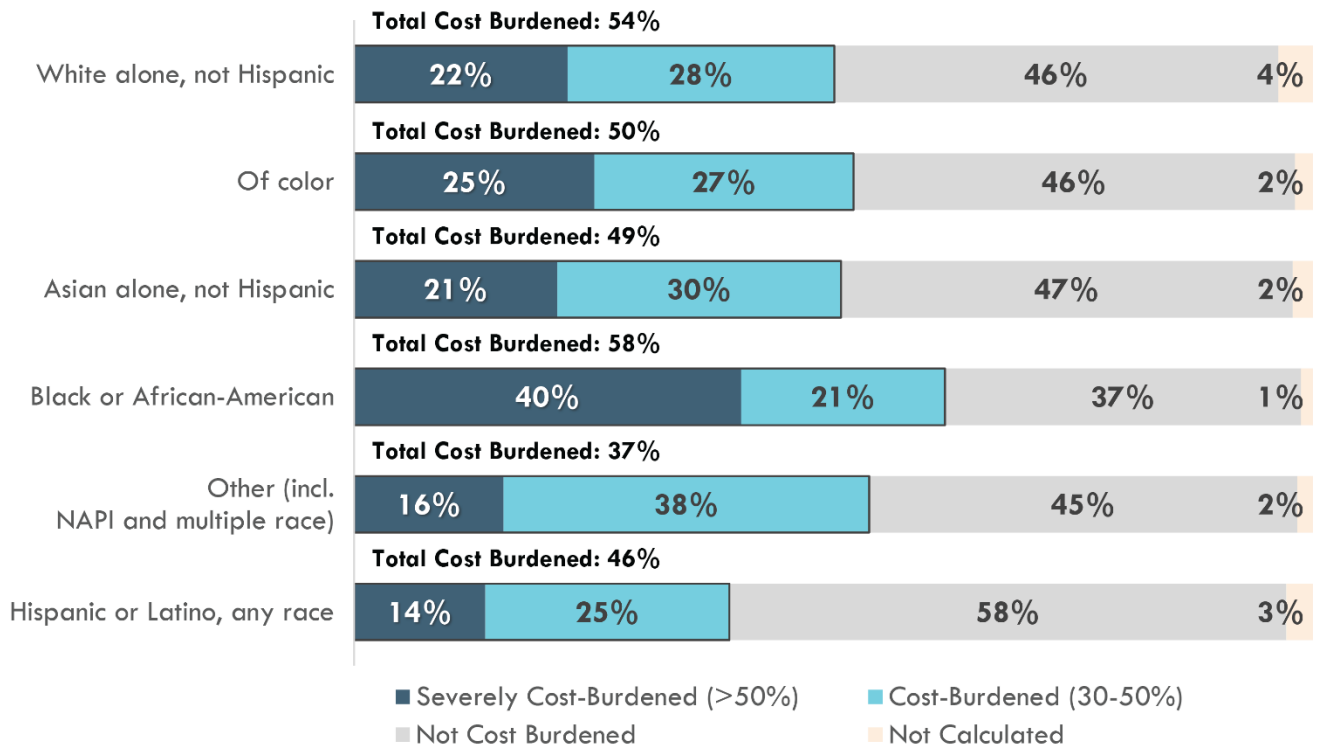
Source: 2018 CHAS; BERK, 2022.

Exhibit 42. Renter Households by Income Category and Cost Burden, 2018.



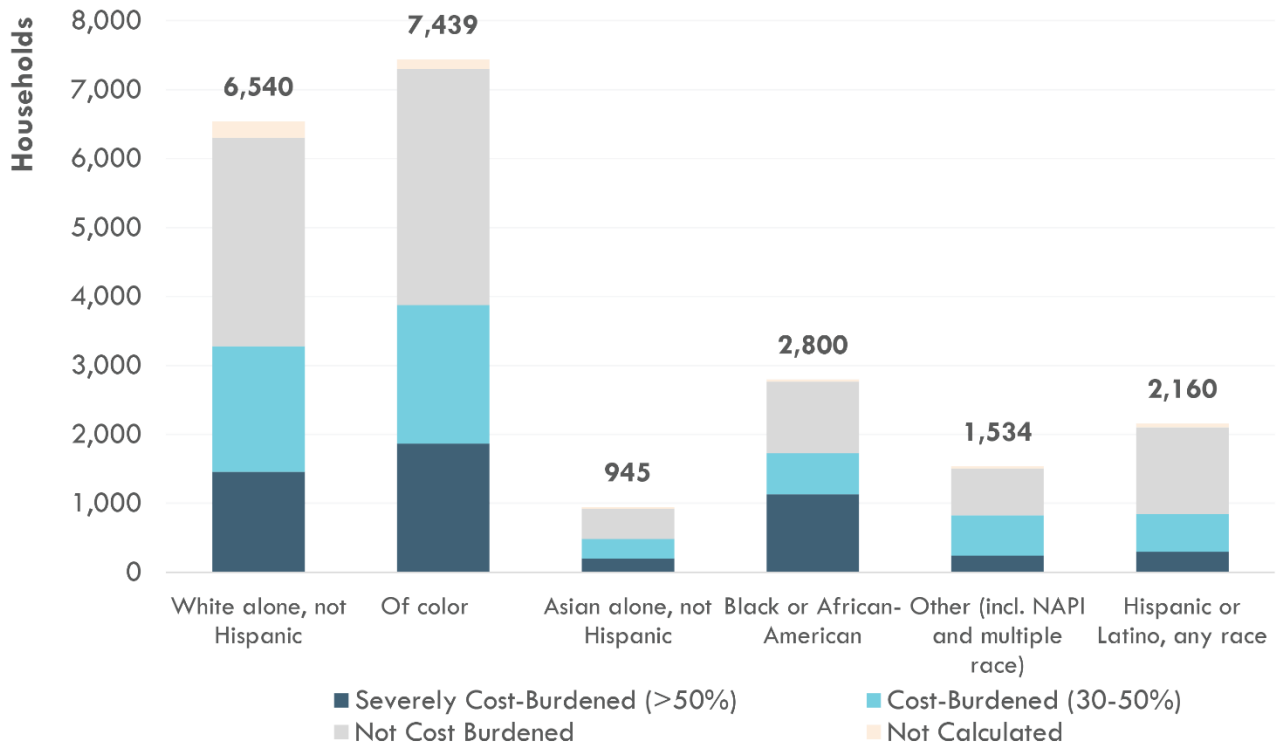
Source: 2018 CHAS; BERK, 2022.

Exhibit 43. Proportion of Renter Households by Race and Cost Burden, 2018.



Source: 2018 CHAS; BERK, 2022.

Exhibit 44. Renter Households by Race and Cost Burden, 2018.



Source: 2018 CHAS; BERK, 2022.

Access to affordable units

When evaluating the major housing affordability gaps, it is important to compare the availability of affordable housing with the characteristics of households that can afford this housing. Two figures below provide a perspective on affordability gaps:

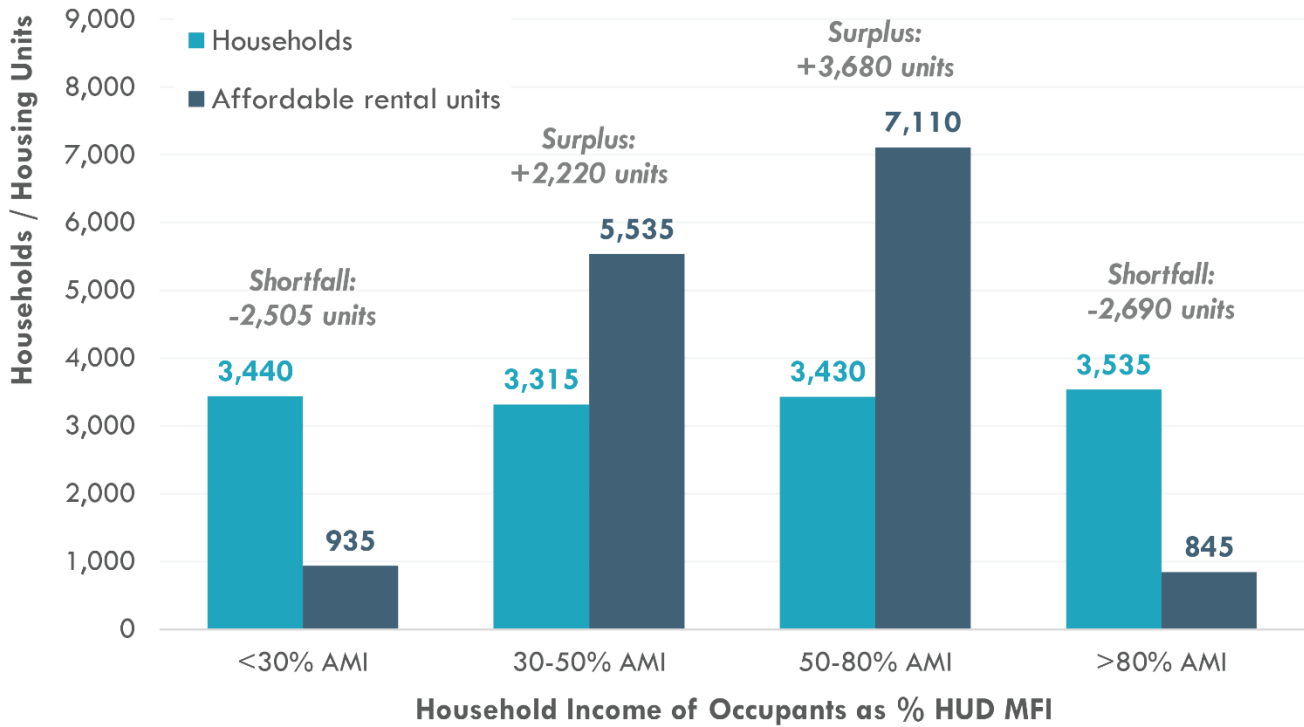
- Exhibit 45 compares the number of rental units that are affordable at given income levels (i.e., where a household would not need to pay more than 30% of their income for rent) versus the number of households in each category.
- Exhibit 46 compares the count of affordable rental units by affordability category between the 2013 and 2018 CHAS datasets. As these datasets rely on the 5-year American Community Survey for household and housing data, this five-year difference is used not only to compare conditions over time, but also to ensure that the same data is not used for both measures.
- Exhibit 47 shows the number of households “uprenting” and “downrenting” by housing unit size.
- Exhibit 48 compares renter household income and affordability between Lakewood and Pierce County.

This information highlights the following:

- **There is notable “uprenting” and “downrenting” in the Lakewood market.** As indicated in Exhibit 45, there are significant deficits at the high and low ends of the market, where there are more households than housing units affordable in each. This is similar to a lot of other markets, where extremely low-income households will tend to “uprent” and spend more of their household income on rent, while moderate income households at 80% AMI or higher will tend to “downrent” and spend less of their income on housing. This distribution demonstrates that the most significant gap that to be addressed is for extremely low-income households.
- **Extremely low- and very low- income households are more likely to uprent.** As shown in Exhibit 47, at least 86% of all households with extremely low incomes are more likely to uprent their home, regardless of housing unit size. Conversely, at least 80% of all households with moderate incomes are more likely to downrent.
- **The losses of affordable housing have been greatest with housing affordable to very low- and extremely low-income households.** Exhibit 46 shows that from 2013 to 2018, there was a decrease in the total amount of affordable housing available to households at 50% AMI or below. While this may represent demolitions of some of these units, this may also reflect rent increases due to various reasons, such as rehabilitation of existing units. This availability decline has most affected households making 30–50% of median income, where the total amount of available housing decreased by about 26%. The severe shortages of units for extremely low-income households suggests that even in this category there may be a significant increase in uprenting.
- **The role of Lakewood in meeting the needs for affordable housing from active-duty service members must be considered.** The South Sound Military and Communities Partnership (SSMCP) published the 2020 Off-Installation Housing Study to improve housing options for active-duty members in communities around Joint Base Lewis-McChord (JBLM). The study identified the need to add 113,000 units by 2040 to meet projected population growth.

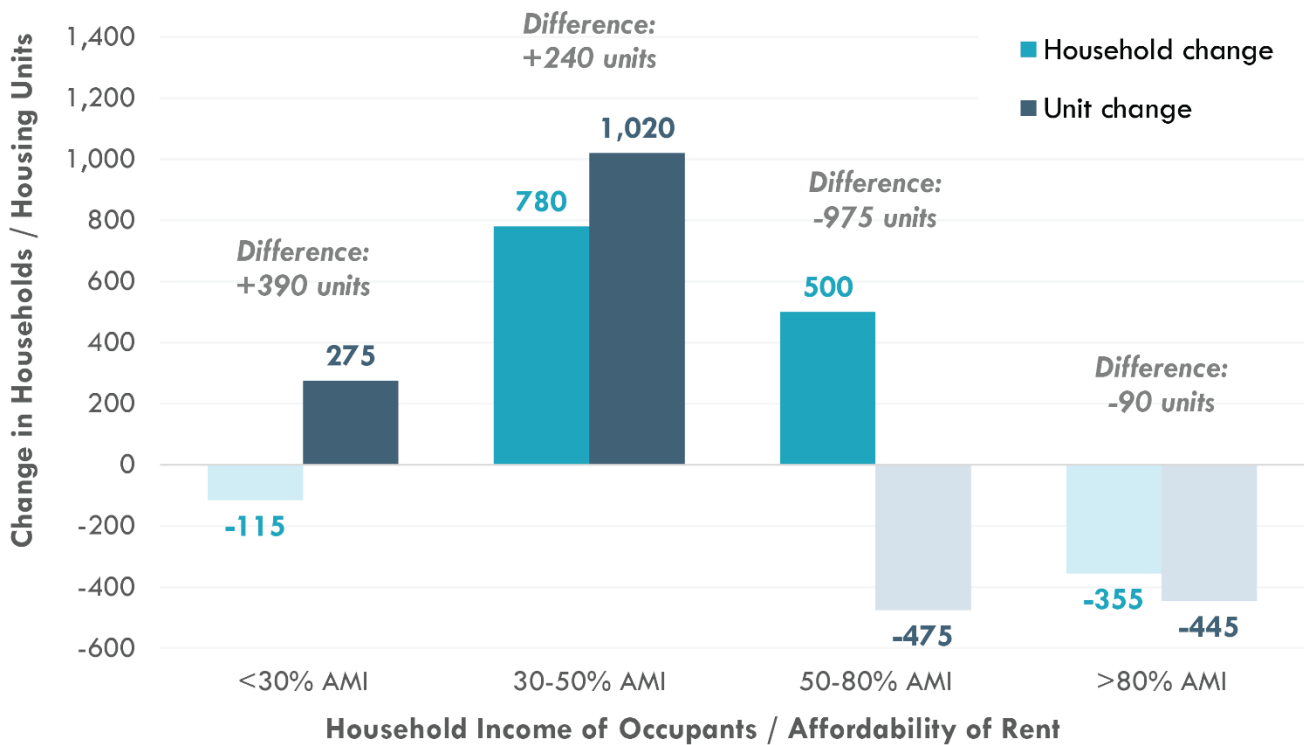
The study recommends that JBLM and military housing needs are considered as part of the City's comprehensive planning processes and that a JBLM Regional Policy Considerations Guide be developed to coordinate with economic development and housing policy.

Exhibit 45. Renter Households versus Affordable Rental Units by Income Category, 2018.



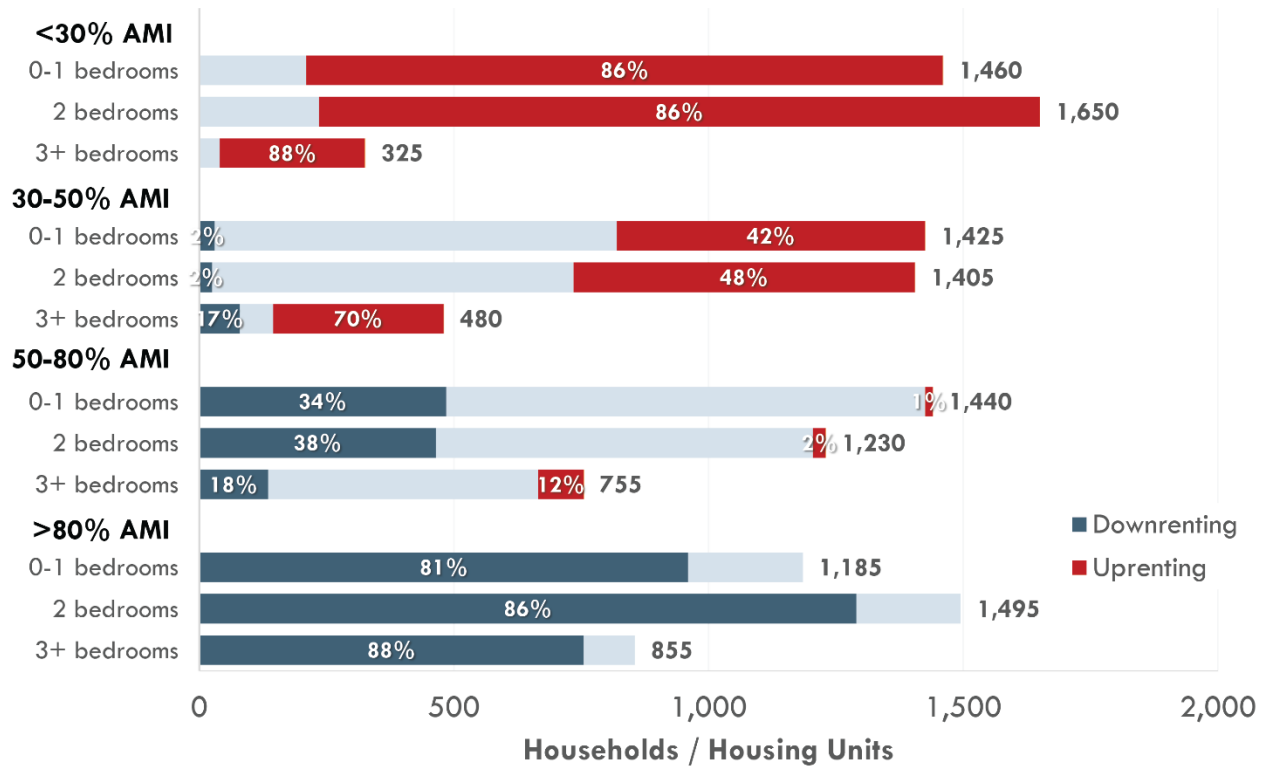
Source: 2018 CHAS.

Exhibit 46. Change in Rental Affordability by Income Category, 2013–2018.



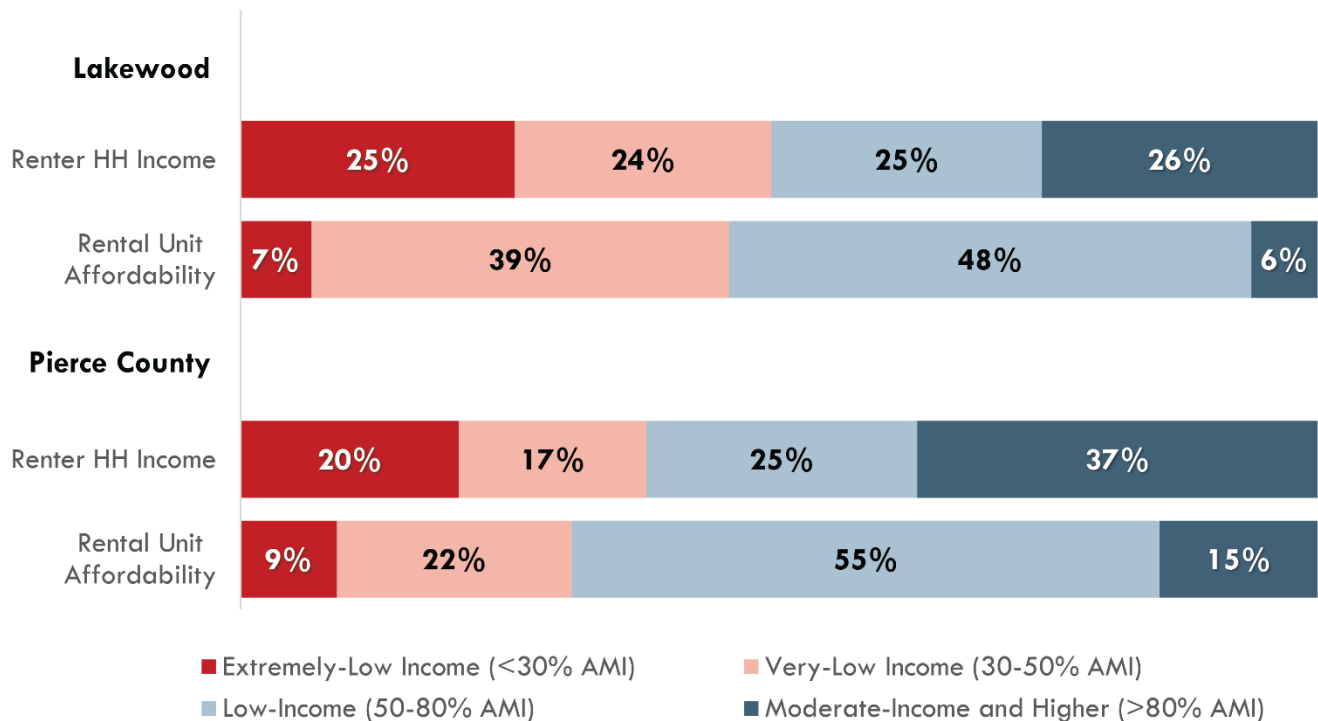
Source: 2013 and 2018 CHAS.

Exhibit 47. Uprenting and Downrenting by Unit Size.



Source: CHAS 2018; BERK 2022

Exhibit 48. Comparison of Renter Income and Affordability.



Source: CHAS 2018; BERK 2022

Housing Incentive Programs

Multi Family Tax Exemption (MFTE) Program

The Multi Family Tax Exemption (MFTE) program allows for multifamily housing projects to be exempt from paying taxes for housing improvements for a period of 8 or 12 years. The tax exemption is based off the improvement value for the residential portion of a project only.

Requirements for an eight-year exemption:

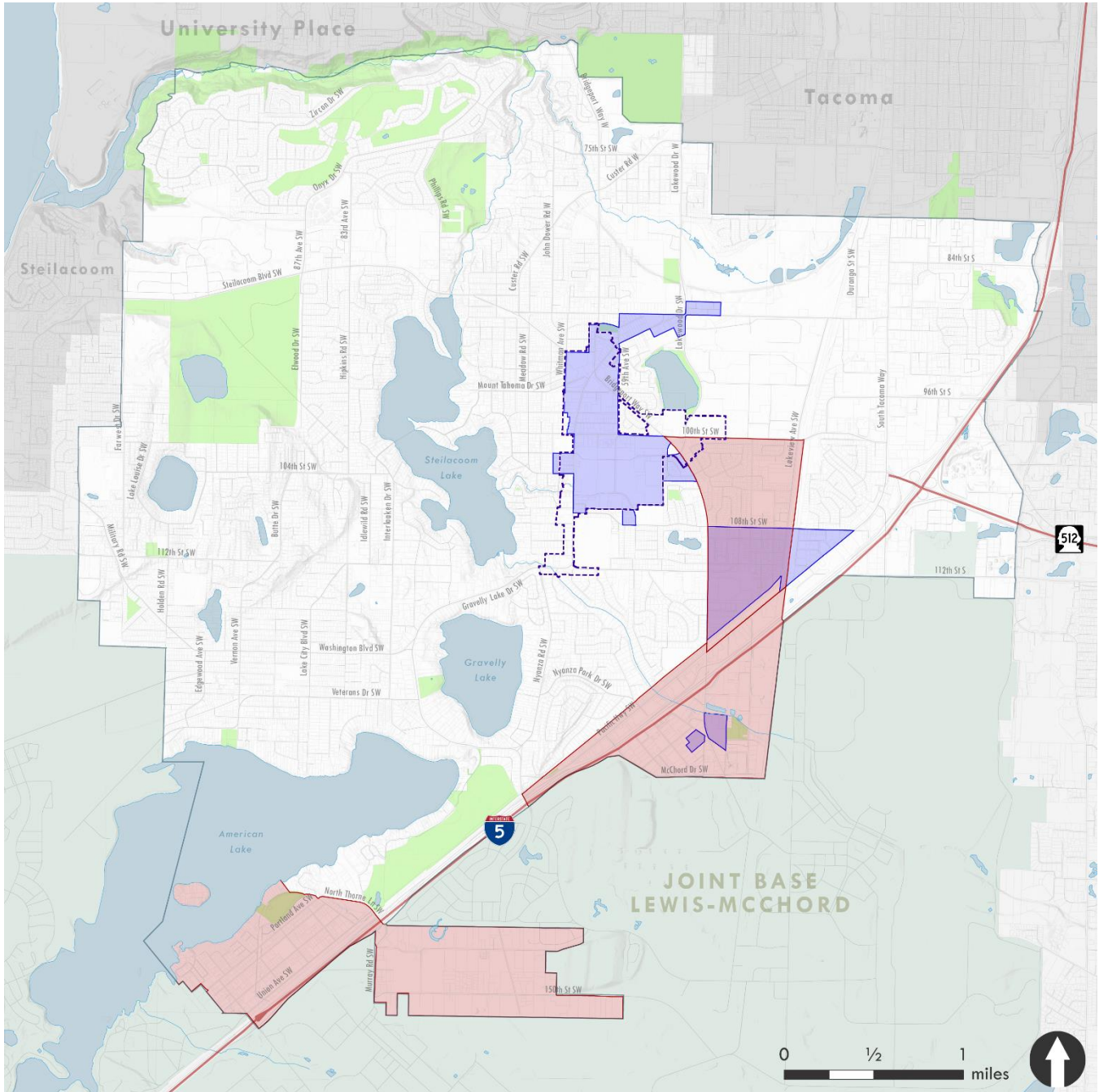
- Location: must be located within a Residential Target Area (RTA), an area identified by Lakewood City Council that is lacking sufficient housing.
 - RTA's can only be sited within the Lakewood Tax Incentive Urban Use Center (TIUUC), or a compact, urban district that qualifies for specific products and services.
- Size: Housing improvements must include a minimum of 4 multi-family (MF) units
- Permanent Residential Housing: 50% of the MF housing units must be provided for permanent residential occupancy
- Proposed Completion Date: All construction and improvements must be completed within 3 years of approval
- Compliance: All construction and improvements must comply with the comprehensive plan, building codes and other standards set by Lakewood City Council in the RTA.

A 12-year exemption can be made when in addition to the requirements above, the owner rents or sells at least 20% of the MF housing units as affordable to low- and moderate-income households.

Opportunity Zones

The Opportunity Zone program provides a tax incentive to fund development and businesses in communities designated as an Opportunity Zone. Each state is allowed to designate up to 25% of low-income census tracts for this program. Within Lakewood, there are four census tracts that have been identified as opportunity zones. This includes census tracts in the Tillicum, Woodbrook, Lakeview-Kendrick, and Springbrook neighborhoods (see Exhibit 41). Through this program, investors can defer on a capital gains tax on investments through December 31st, 2026.

Exhibit 49. Location of MFTE Residential Targeted Areas and Opportunity Zone Census Tracts.



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water
- Parks
- Regional Growth Center
- Highways
- Arterials
- Roads

Incentive Areas

- MFTE Residential Targeted Areas
- Opportunity Zone Census Tracts



Map Date: October 2022

Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Lakewood Municipal Code 18A.90 Housing Incentives Program

Lakewood Municipal Code 18A.90 Housing Incentives Program provides certain incentive programs for developers to include affordable housing in future residential development, including zoning and financial bonuses based on individual land use applications.

Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME)

Lakewood's Community Development Block Grant (CDBG) program provides financial and technical resources to government municipalities on community and economic development projects, including housing. CDBG funds must be used to support low- and moderate- income households.

Key recent program achievements include:

- Developed and implemented:
 - the FY2020-2024 Five Year Consolidated Plan and 2020 Annual Action Plan.
 - Lakewood's 2020 Analysis of Impediments to Fair Housing.
- Managed the HOME Multifamily & Homeownership Affordability Fund, Section 108 program and the Major Home Repair / Sewer Loan program; and the HOME Housing Rehab program.

Looking ahead, the City will:

- Facilitate the implementation of the Five Year 2020-2024 Consolidated Plan and associated Action Plan.
- Perform at least 18 dangerous building abatements annually.
- Continue to monitor the HOME Multifamily & Homeownership Affordability Fund and Section 108 program.
- Monitor Habitat for Humanity redevelopment projects in the Tillicum neighborhood.
- Implement the Tenant Based Rental Assistance (TBRA) Program.
- Develop a Capital Facilities Plan for Living Access Support Alliance (LASA)'s Gravelly Lake Commons project.

Rental Housing Safety Program (RHSP)

The Lakewood Rental Housing Safety Program (RHSP) was adopted in 2016 to ensure all rental units are safe and habitable. The program aims to ensure all rental units adhere to life, fire, safety, and health regulations. The RHSP program also increases awareness of these housing standards to property owners, managers, landlords, and tenants. As of November 2017, all rental units are required to be registered to the RHSP website and be inspected every 5 years. As of 2020, 90% of all rental units (11,968) were registered and 485 initial inspections had been conducted by City and private inspectors.

Inspections and enforcement under RHSP were slowed by the COVID-19 pandemic. Looking ahead into 2023, RHSP will restart full enforcement on rental units that are not registered or inspected.

Dangerous Building Abatement

In 2021, Lakewood completed 12 dangerous building abatements and three public nuisance actions. As of June 30, 2022, five dangerous building abatements and one public nuisance action were completed and 15 dangerous building abatements and five public nuisances were pending. These building abatements offer unique housing opportunities within the City to provide safe, affordable housing options to help Lakewood meet their housing need.

Part 2: Projected Housing Needs

Overall Projections

Per the information provided in Part 1 of this report:

- Exhibit 50 provides a tabulation of the development capacity available as of the Buildable Lands Report review in 2020.
- Exhibit 51 presents the 2044 population target for Lakewood under the Pierce County Countywide Planning Policies.
- Exhibit 52 shows the corresponding housing target under the Countywide Planning Policies to achieve these population goals.

These figures highlight that while the City may include enough overall development capacity to accommodate needed housing over the next 20 years, there are certain key considerations for Lakewood when planning for future development:

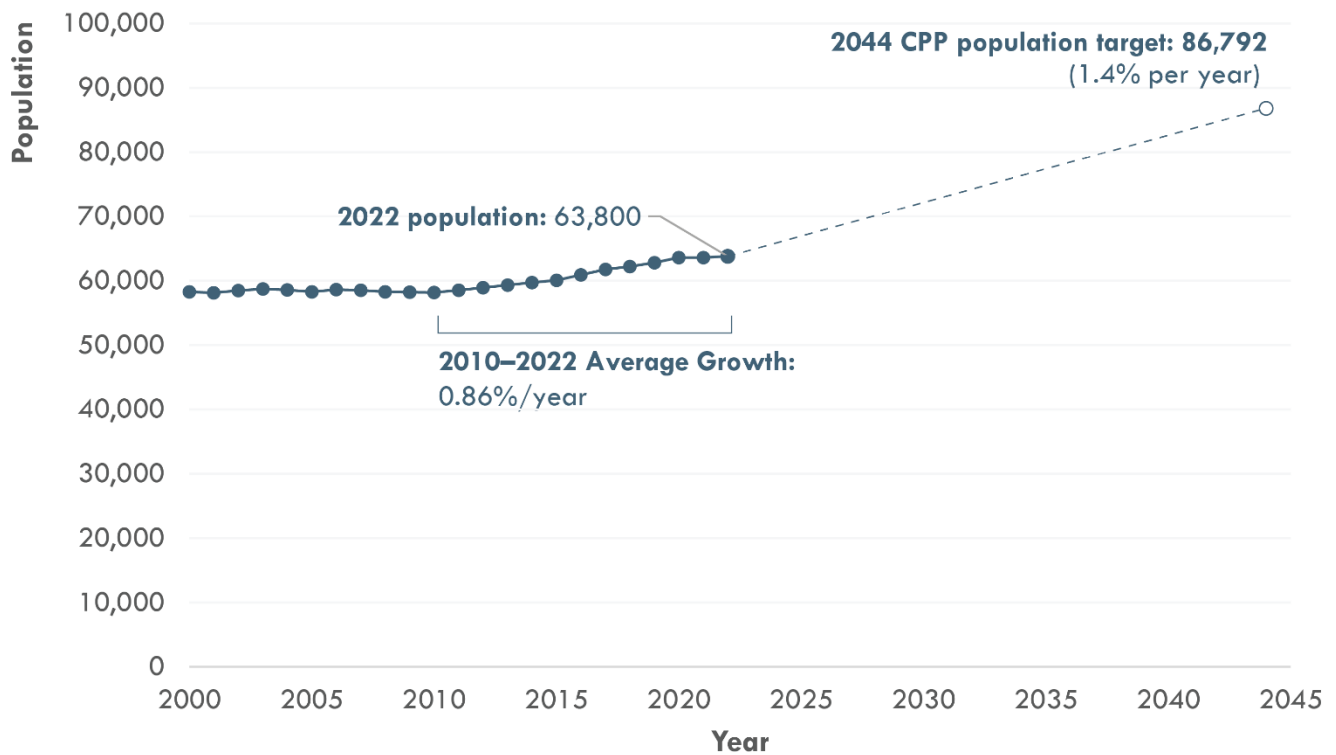
- **Significant reliance on redevelopment opportunities.** 78% of the available housing capacity (8,889 units) in the City is on “underutilized” sites, which include both infill and redevelopment opportunities. While this can be a way to accommodate new growth, these areas are often more challenging to develop than vacant sites. Based on State law changes adopted in 2023 that require cities to allow multiple dwelling units on traditionally single family lots and also strongly encourage accessory dwelling units (ADUs), Lakewood will need to review its zoning and development regulations to ensure that underutilized residential sites are made attractive for denser use over time.
- **Capacity is focused in existing multifamily areas.** While overall housing targets can be accommodated under the general tabulation of capacity, most of Lakewood’s capacity available is on multifamily-zoned parcels. Only 14% of total capacity (1,594 housing units) is located in Residential 1, 2 and 3 zones that do not allow multifamily housing of any kind (or in the case of the R4 zone, only permit duplexes as a conditional use). Given that about half of the current housing stock in Lakewood is single-family residential (see Exhibit 27 in Part 1), this indicates a very significant shift in the types of housing that will be needed to meet these targets. This also raises the question for Lakewood whether to allow additional housing types in the R1, 2, 3, and 4 zones in order to provide additional housing unit capacity in more areas of the City. Again, recent state law changes will influence how Lakewood addresses where to concentrate future housing growth.
- **Potential for displacement.** The reliance on underutilized sites also means that existing housing with affordable rents could be lost in favor of new development with higher rents in these targeted areas. This can challenge efforts to maintain affordability in the community for lower-income households. Policies will need to be in place to address these potential impacts to the community.

Exhibit 50. Lakewood Development Capacity, 2020–2044.

Zone	Vacant	Underutilized	Vacant Single Unit	Pipeline	Total
CBD	181	2,405	0	67	2,653
MF1	132	1,251	16	5	1,404
MF2	304	1,240	0	80	1,624
MF3	152	1,164	0	1	1,317
MR1	0	147	0	1	148
MR2	42	636	5	5	688
NC1	2	17	0	42	61
NC2	49	458	0	2	509
R1	7	26	17	1	51
R2	15	91	39	20	165
R3	172	739	91	34	1,036
R4	23	237	58	24	342
TOC	124	478	0	771	1,373
Total	1,203	8,889	226	1,053	11,371

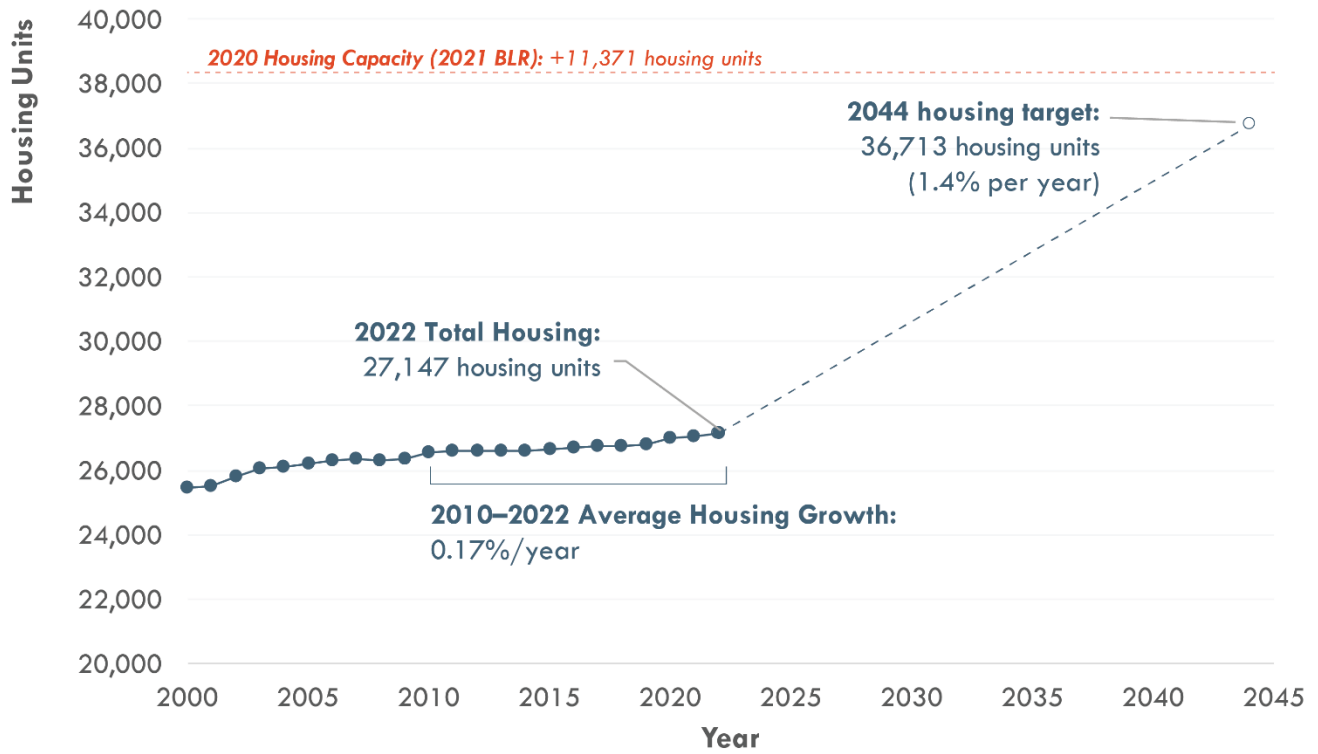
Source: Pierce County, 2021.

Exhibit 51. Historical Population and 2044 Population Target.



Source: OFM, 2022; BERK, 2022; Pierce County, 2022.

Exhibit 52. Housing Unit Counts and 2044 Housing Target.



Source: OFM, 2022; BERK, 2022.

Projections by Income Level

Under the *Growth Management Act* after the adoption of 2021's E2SB 1220, the housing elements of Comprehensive Plans are required to identify the number of units needed for future growth at the following income levels²:

- **Moderate** income (80–120% of the metro/county median family income, divided between 80–100% and 100–120%)
- **Low** income (50–80% of median family income)
- **Very low** income (30–50% of median family income)
- **Extremely low** income (0–30% of median family income)

(Note that this also consequently indicates planning for high-income households at greater than 120% of median income.)

Needs for extremely low-income households are disaggregated further between those households that require permanent supportive housing (PSH) or similar types of supportive services, and other households that do not require these services.

Addressing these units through housing policy is important for a number of reasons:

- Future zoning and land use regulations may need to be adjusted to accommodate those housing types that may be more affordable to other income levels. Higher identified demand by lower income households could require a greater focus on multifamily development options, such as “missing middle” housing types.
- Efforts to provide incentives for operating affordable housing may need to be focused at particular income levels where demands and needs may be the highest.
- Work by the City to support affordable housing developers may need to prioritize housing at different income levels.
- “Wrap-around” social services to be provided with PSH may need to be coordinated in part by the City to ensure that residents receive the proper support.

The Washington State Department of Commerce's Housing for All Planning Tool (HAPT) produced the housing unit allocations for Lakewood that were adopted by Pierce County via Ordinance 2023-22s and are shown in **Exhibit 53**.³

Exhibit 53. Lakewood Housing Targets by Income Level.

Permanent Housing Needs by Income Level (% of Area Median income (AMI))										
		Total	0-30%		30-50%	50-80%	80-100%	100-120%	120%+	Emergency Units
			PSH	Non-PSH						
Lakewood	'20 Est.	26,999	588	101	4,565	11,699	4,347	2,250	3,449	8
	'44 Allocation	9,378	1,212	1,367	1,739	1,375	592	536	2,287	574

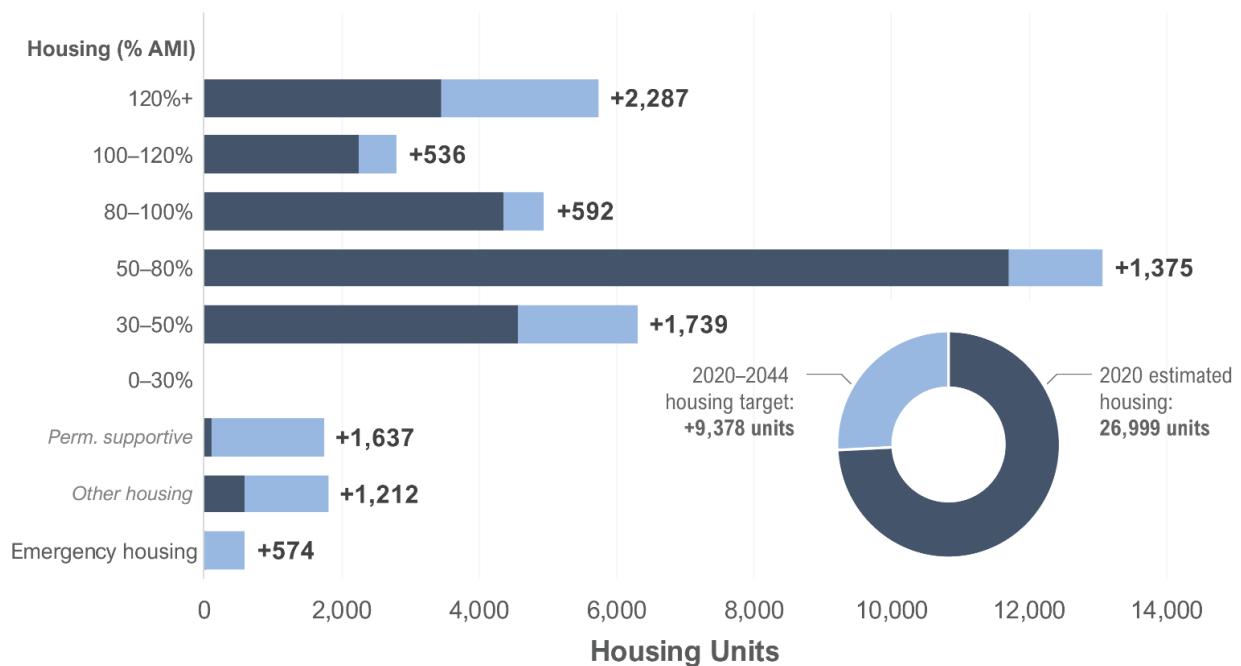
Source: Department of Commerce, 2023, and Pierce County Ordinance 2023-22s.

² Under the Act, [RCW 36.70A.070\(2\)\(a\)](#) requires that communities identify needs at these different income levels.

³ See the Department of Commerce [Updating GMA Housing Elements](#) website for more information.

These results highlight the following with respect to accommodating these targets with land use policy:

- There are significant needs for housing for extremely low-income households.** About 28% of the total housing target is proposed to be allocated to extremely low-income households making 30% of median family income or less. This is a substantial policy change, as the current Comprehensive Plan identifies that 25% of housing should be directed to households making 80% of median income or less.⁴ While the Comprehensive Plan requirements do not indicate that this mandate also requires financial support from the City, it does suggest that certain development incentives may need to shift to address these needs.
- A substantial amount of new housing will be targeted to high-income households in multifamily development.** There is a projected need for higher-income housing in Lakewood. This is due in part to the large number of these households choosing to own housing with payments lower than what they might be able to afford if they were to move today. While this may not be as much of a priority for specific housing policies and incentives, it could contribute to higher residential property taxes and a more mixed-income environment in neighborhoods. However, given the availability of development capacity, this will likely require higher-end multifamily style development as well as a consideration of whether to allow additional housing types in zones that currently are limited to single family.



⁴ See Policy LU 2.1.4 in the [City of Lakewood Comprehensive Plan](#).

Special Housing Needs

In addition to housing targets by income level, there are also targets provided for three specific types of housing related to special housing needs:⁵

- **Emergency shelters** are facilities that provide temporary shelter for individuals or families who are currently homeless. They may not require occupants to enter into a lease or an occupancy agreement, and may include day and warming centers that do not provide overnight accommodations.
- **Emergency housing** includes temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. They may or may not require occupants to enter into a lease or an occupancy agreement.
- **Permanent supportive housing** is subsidized, leased housing with no limit on length of stay. This prioritizes people who need comprehensive support services to retain tenancy, and it utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing. These barriers can be related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support people living with complex and disabling behavioral health or physical health conditions experiencing homelessness or at imminent risk of homelessness prior to moving into housing. This can help residents to retain their housing and be a successful tenant in a housing arrangement, improve the residents' health status, and connect the residents of the housing with community-based health care, treatment, or employment services.

Targets that have been developed based on the Department of Commerce methodologies are provided in 3. Lakewood's 2023 emergency housing units totaled 8, and the zoning code was silent on both emergency housing and emergency shelters. The requirement to plan for emergency housing and emergency shelter was initially addressed in the City's 2023 Comprehensive Plan amendment cycle; the City will need to review its actions regarding special needs housing in light of the equity policies required as part of the 2024 Comprehensive Plan Periodic Review.

According to the Department of Commerce, in 2020 Lakewood had 101 units of permanent supportive housing. A major policy focus will need to be on relationships with regional housing agencies to help understand both the specific needs for emergency and supportive housing, and effective ways to accommodate this housing in the City.

⁵ These definitions are drawn from the Department of Commerce [Projection Methodology](#) for the E2SB 1220 targets.

Part 3. Racial Equity and Displacement

Introduction

There are distinct issues with housing supply across the region, as housing production has not kept up with growth. This shortfall has had significant disproportionate (i.e., more severe) impacts on many communities. Communities of color have often experienced higher cost burdens, substandard housing conditions, lower household wealth, and fewer homeownership opportunities. This has often been rooted in historical patterns of discrimination and exclusion in the housing market that has echoed across generations, as well as related impacts on household income and wealth.

Under new requirements of the Growth Management Act, within the 2024 Comprehensive Plan periodic review cities and counties are required to include several components to consider these trends:⁶

- Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.
- Identify and implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions.
- Identify areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.
- Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities.

This section provides guidance on how racial equity in housing and the potential for displacement, especially of communities of color, should be considered as part of the updates to the City of Lakewood Comprehensive Plan. In addition to providing a definition of displacement and exclusion, this section:

- Provides a high-level assessment of racially disparate impacts and displacement risks.
- Reviews current housing policies that may have racially disparate impacts in housing, potentially through excluding or displacing people from the housing market.
- Presents options for future efforts to address displacement and exclusion in the housing market.

⁶ See [RCW 36.70A.070\(2\)\(e\) through \(h\)](#).

Defining Displacement

Over time, it is likely to get more difficult for many households to access the housing they need in the market. Higher prices, lower vacancy rates, and a lack of appropriate housing can make it harder for some people and families to find safe, affordable housing that meet their needs. One impact of these pressures is often a “displacement” of these households.

Under displacement, people are excluded from living in a community they have or could have accessed in the past, primarily because they cannot find appropriate and affordable housing. Generally, there are three types of displacement in a community:

- **Economic displacement** occurs when current residents simply cannot afford to pay rent for housing that is suitable for them. In these cases, people may be forced to find lower-cost options elsewhere.
- **Physical displacement** is when the housing units that people rely on for affordable housing options is redeveloped or rehabilitated, and no longer exists. If there are no other appropriate and affordable options in the local market, residents may leave, even if some housing in the neighborhood might be affordable to others.
- **Cultural displacement** is a secondary effect that occurs when economic and physical displacement have resulted in neighbors in a community leaving to live elsewhere. This loss of local social connections can have significant impacts, especially where businesses and institutions serving local cultural communities lose support. This loss of social and community capital can hasten the decision for other households to relocate.

These types of displacement are often **direct**, where existing residents are pressured to leave due to neighborhood changes. However, **indirect** displacement can also occur where potential residents that would have been able to access the community in the past are now excluded due to a lack of affordable housing options, or reduced community connections make an area less desirable.

The effects of displacement can be considerable, not just for individual households, but also to the community and region:

- A lack of affordable housing options in a community can lead to people moving elsewhere to access housing options. This can mean longer commutes and higher transportation costs, fewer services and community ties, and potentially even people occupying housing that is unhealthy or unsafe. Housing insecurity can lead to financial, social, and health impacts, and can even lead to homelessness.
- For neighborhoods, displacement reduces community cohesion and social bonds as long-term residents are forced to leave the area for other housing. This can reduce many of the social supports that households rely upon. Additionally, while new development can bring additional resources and amenities, the changes to local services and amenities may not support the needs of existing residents.
- For social and cultural groups in the City, displacement can affect their long-term sustainability. Reducing important social connections can change the cultural character and makeup of a community, and local businesses supporting these communities may no longer have the customer base to continue. As noted above, this can encourage further cultural displacement.

- Local businesses may need to manage employees that are displaced from the community and need to commute longer distances to find appropriate housing. This can make it far more difficult to attract workers, especially lower-income employees that may be less likely to commute for longer distances to work.
- For the City and region, displacement can often result in higher rates of homelessness. Displacing lower-income households to other areas, especially suburban locations with fewer resources, also puts an additional strain on social services, and can make service delivery harder.

Many households experiencing displacement pressures such as increasing rents try not leave a community. This may especially be true when they value the social connections, amenities, and services available in an area. However, these households will experience more housing instability if they remain. Again, some may be forced to live in housing that may not be safe or appropriate for their needs, or even experience homelessness.

While all neighborhoods are expected to grow and change, displacement is specifically related to involuntary choices driven by market conditions. Although the City cannot address all of these impacts, state law now requires that Lakewood develop and expand policy options to help address and minimize displacement.

Assessing Racially Disparate Impacts and Displacement

Introduction

There are several ways to measure how racially disparate impacts in housing and risks of housing displacement can manifest in a community. Available data from the US Census and other sources, this can be viewed in two ways:

- **Community-wide measures** that examine trends in race and housing over the entire City. These measures can identify broad city-wide trends with race, income, and housing, and highlight overall elements to consider in planning for racially-disparate impacts.
- Measures of subarea **geographical distribution** can highlight how households of color are distributed across the City, and how this can relate to the distribution of major risk factors. This is often coordinated at the Census tract or block level, depending on the data, and can provide a more focused assessment of specific locations where further measures may be needed.

Community-wide measures

Based on available data from the US Census Bureau and HUD, several dataset categories highlight some of the major racially-based differences in household characteristics and housing access and security:

- Population distribution and change;
- Race and household income; and
- Housing tenure and cost burden.

Population distribution and change

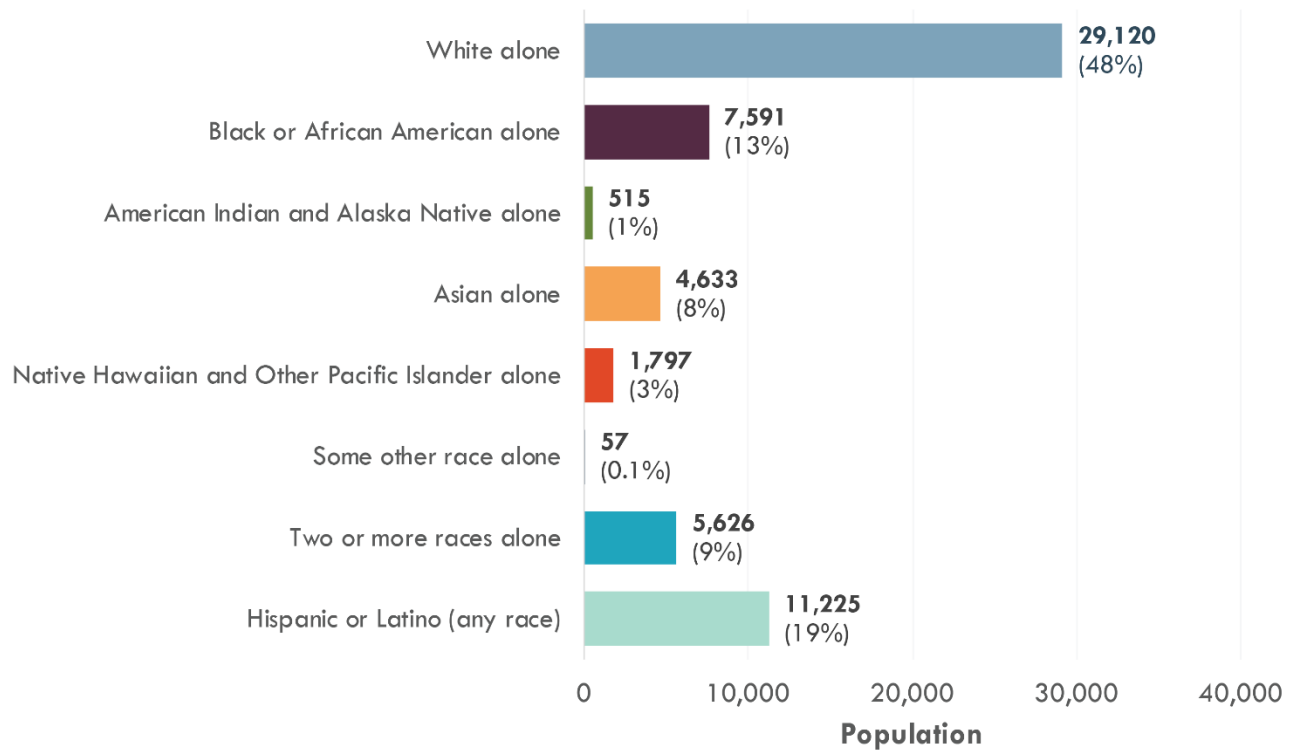
The following exhibits present distributions of population by race/ethnicity for Lakewood:

- Exhibit 54 provides an overall distribution of the population by race and ethnicity for 2020.
- Exhibit 55 presents a comparison between the racial distribution of Lakewood and Pierce County.
- Exhibit 56 compares the racial distribution of Lakewood in 2015 with the distribution in 2020.

These figures indicate the following:

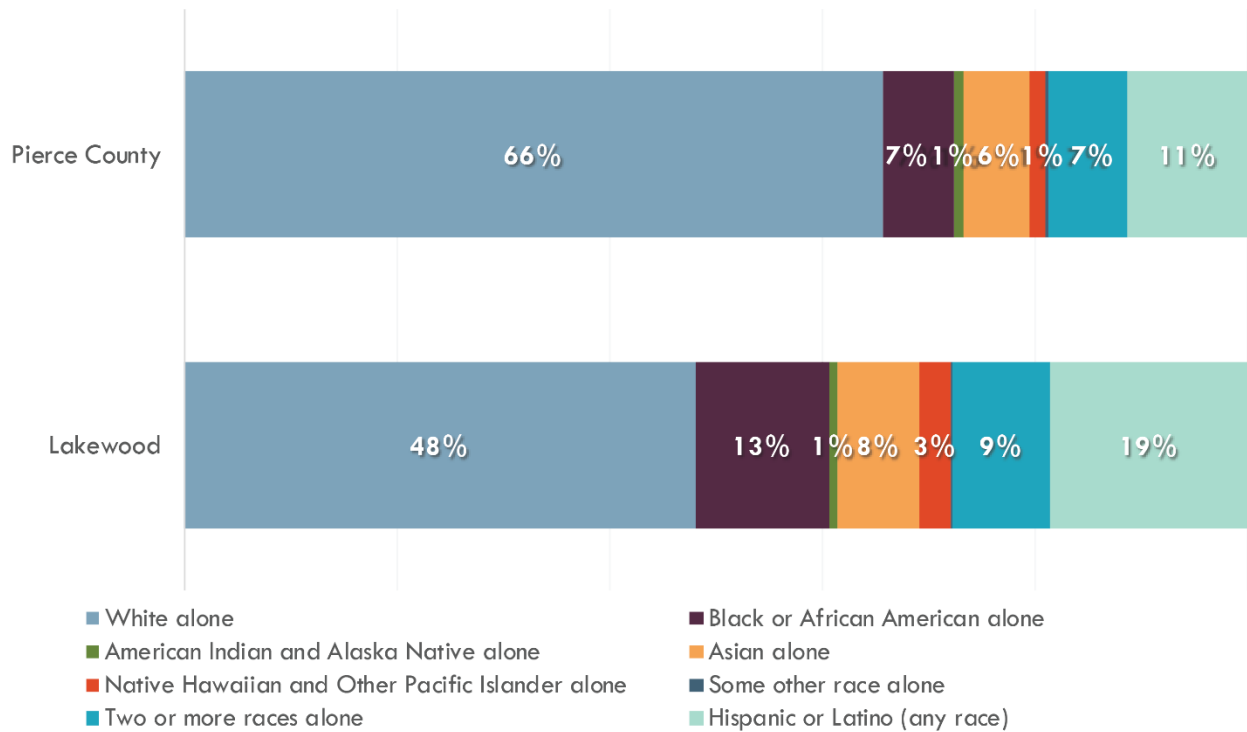
- **The population of Lakewood is substantially white, with a notable representation of other groups that comprise a majority of the population.** 48% of the population of the City is white alone, while 13% of the population identifies as Black or African American, 13% as multiracial, and 7.7% as Asian, and about 19% of the population as Hispanic or Latino of any race.

Exhibit 54. Population of Lakewood by Race/Ethnicity, 2020.



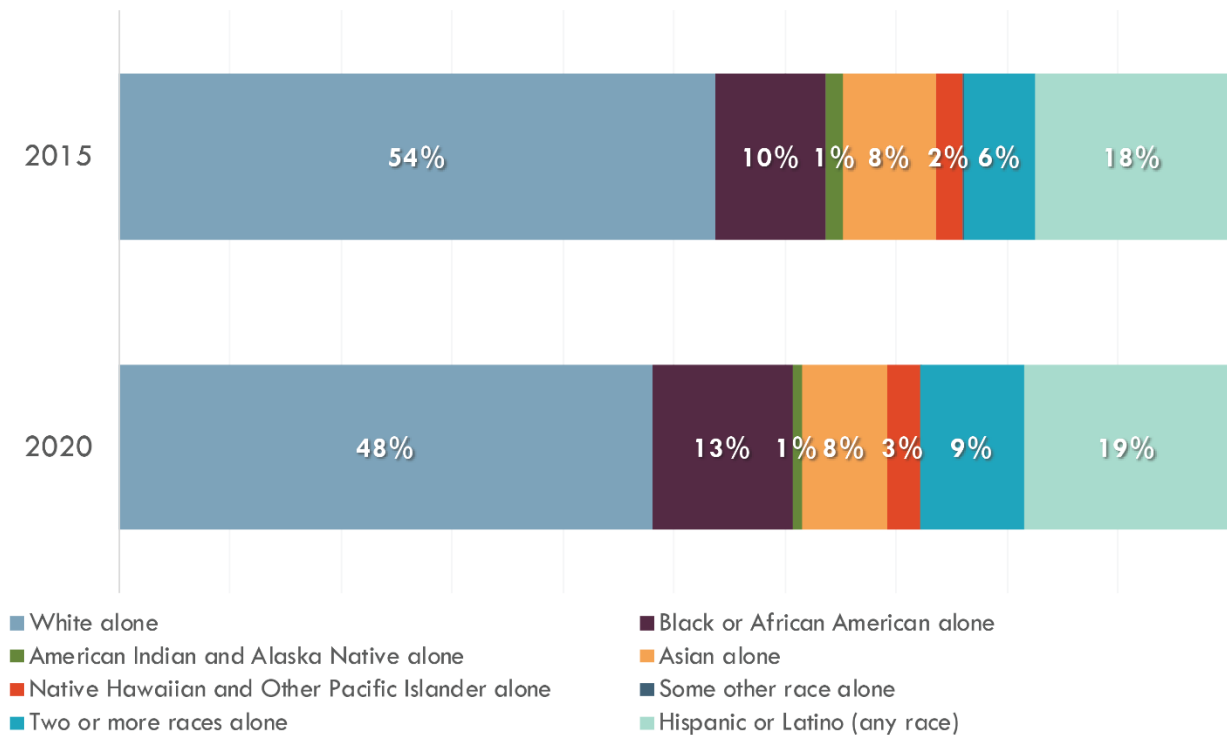
Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

Exhibit 55. Comparison of Racial Composition, Lakewood versus Pierce County, 2020.



Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

Exhibit 56. Comparison of Lakewood Racial Composition, 2015 and 2020.



Source: US Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

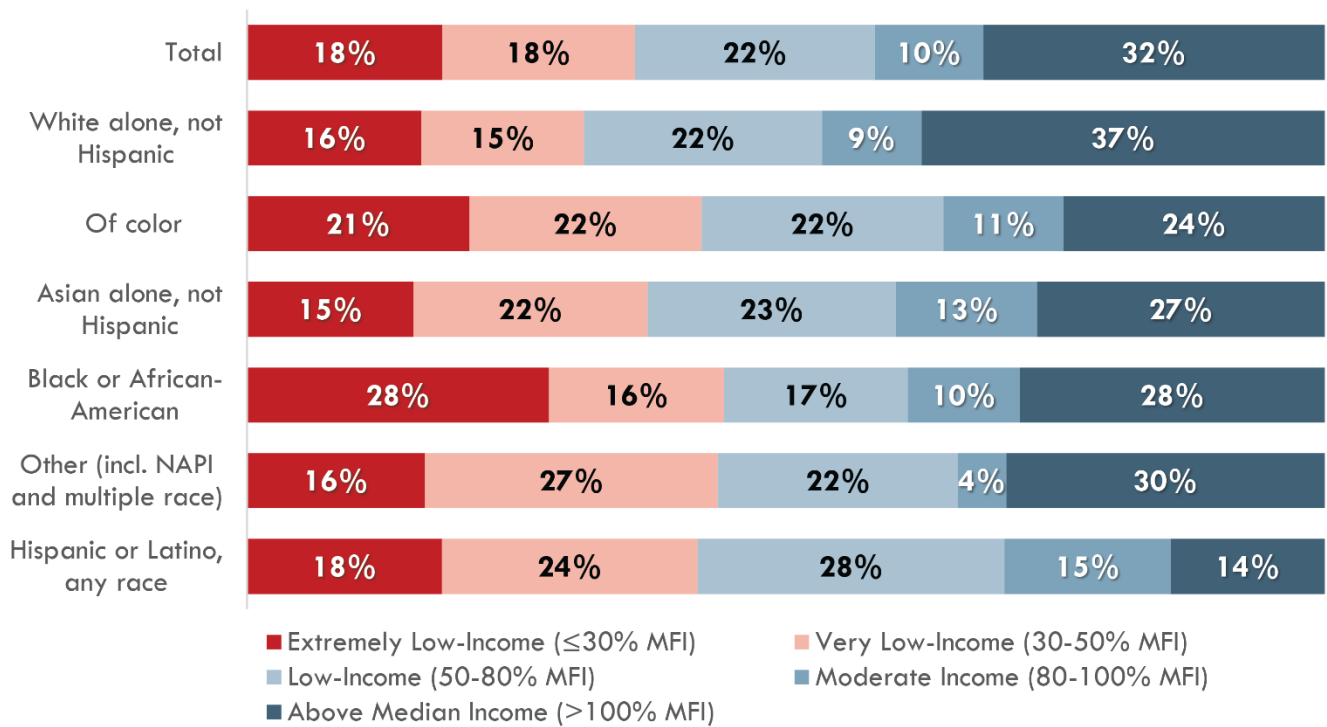
- **Lakewood is more diverse than Pierce County as a whole.** In 2020, about 52% of the population of Lakewood consisted of people of color, compared to only 34% of the population of Pierce County. The proportion of Black or African American residents in Lakewood is twice that of the county, and Hispanic/Latino residents make up 19% of the population of Lakewood versus 11% of the county overall. This highlights that Lakewood tends to be more diverse than many of the other communities in Pierce County.
- **The City is becoming more diverse over time.** From the comparison of the 2015 versus the 2020 population in Exhibit 56, the largest proportional growth was people identifying as Black/African-American and multiracial, which both increased by about 3 percentage points over this period.

Race and household income

The exhibits below provide insight into the differences in household income by race in the City:

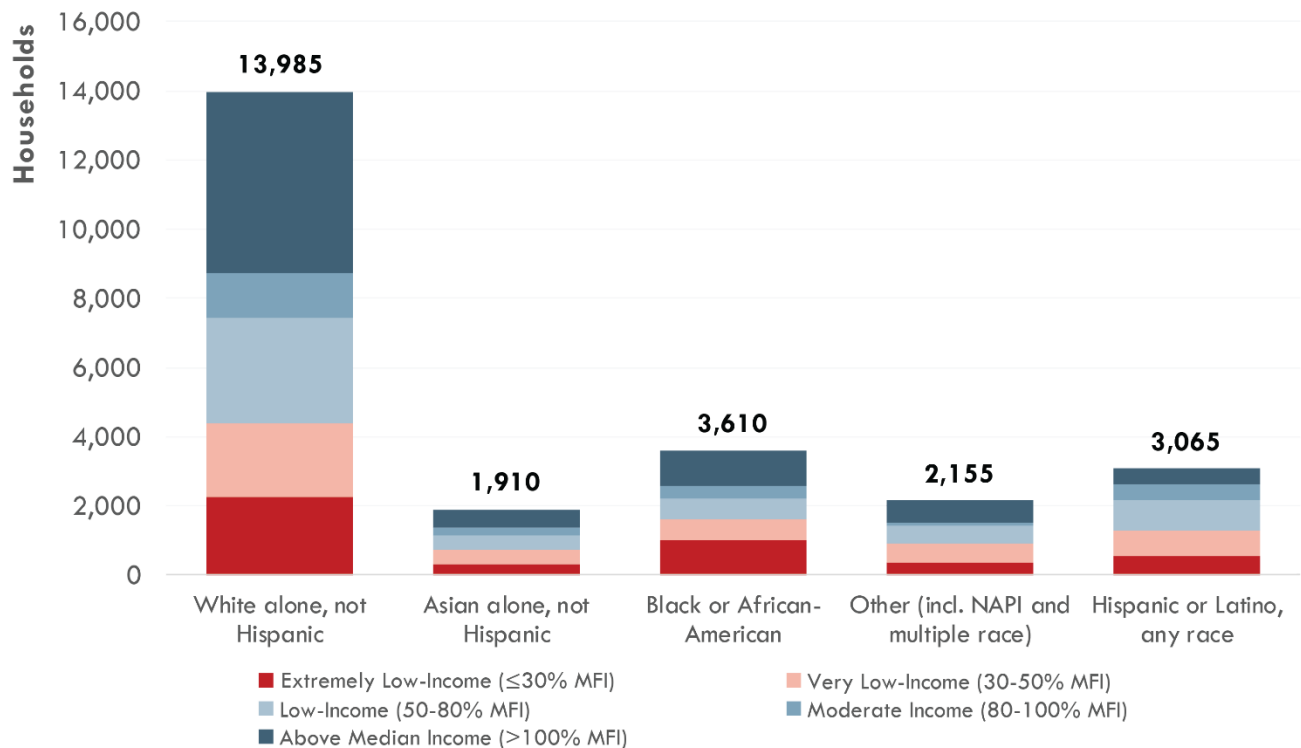
- Exhibit 57 provides proportional distributions between five different income categories based on area median income, for different divisions by race and ethnicity.
- Exhibit 58 provides this information in terms of household counts (with certain categories combined where necessary).
- Exhibit 59 provides household counts for broad categories of race to highlight major differences between white and POC households in the city.

Exhibit 57. Percent of Households by Race and Household Income, 2019.

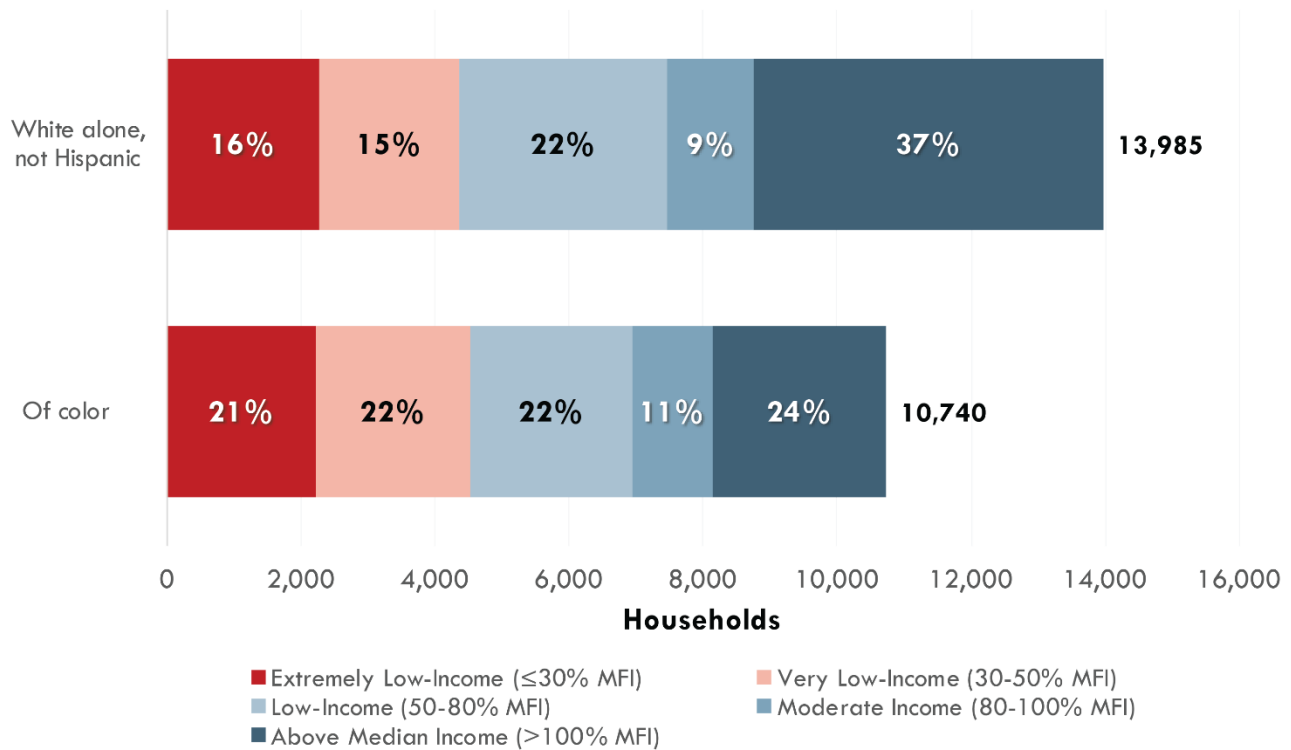


Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

Exhibit 58. Count of Households by Race and Household Income, 2019.



Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

Exhibit 59. Count of Households by White/POC Status and Household Income, 2019.

Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

These data above indicate the following:

- There are significant differences in income distributions in the City between white and POC households.** From these three figures, it is clear that with the distribution of household income, white households tend to skew higher. For white households, only 16% are extremely low-income (30% AMI or below), while 37% are above median income. Conversely, about 21% of POC households are extremely low-income, while only 24% are above the median.
- There are a disproportionate number of extremely low-income Black or African-American households.** Although the overall proportion of households that were extremely low-income in 2019 was about 18%, about 28% of Black or African-American households were extremely low-income. Similarly, the proportion of Black or African-American households with incomes greater than the median is less than the overall proportion (28% versus 32%).
- There are fewer Hispanic/Latino households with above median income.** Although the proportion of Hispanic/Latino households that are extremely low-income is comparable to the overall average, only 14% of Hispanic/Latino households are above the median income versus the overall average of 32%.
- These constraints suggest that these households may be impacted by housing insecurity.** In these cases, lower household incomes and potentially lower household wealth can have significant impacts on whether these households can afford healthy, safe, and convenient housing in the community. These households may be the focus of targeted financial and housing assistance.

Housing tenure and cost burden

In addition to understanding the relationships between race and household income, it is also important to evaluate “tenure” (whether households rent or own their homes) and housing cost burdens. The following exhibits present information regarding the following:

- Exhibit 60 provides a breakdown of household tenure by race and ethnicity.
- Exhibit 61 indicates the proportion of different renter groups that are “cost burdened” and paying a disproportionate amount of their income.
- Exhibit 62 provides information about the count of renter households that are “cost burdened”.

These charts highlight two different types of “housing cost burden”:

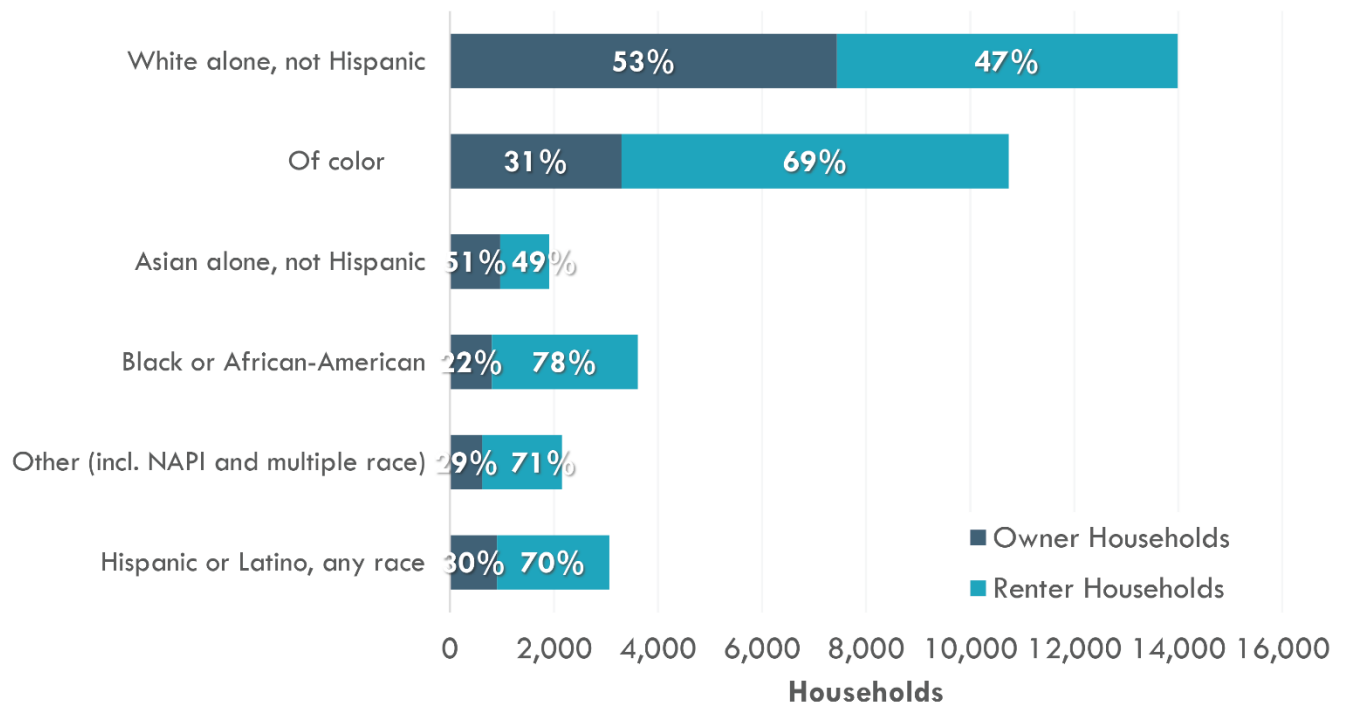
- **“Cost burdened”** households typically pay over 30% of their household income on housing costs. Note that this includes not only rent, but also utilities and any other mandatory charges associated with occupying the house.
- **“Severely cost burdened”** households pay over 50% of their income on housing costs.

Note that Exhibits 61 and 62 focus on cost burden as it relates to rental housing only. Cost burdens can certainly apply to homeowners; new homebuyers carrying significant mortgage debt or older householders with minimal incomes and high housing expenses could be considered “cost burdened” as well. However, unlike renters, households that own their own home can draw upon household wealth in certain cases, and those that do not have a mortgage may have significantly lower housing costs.

From this information come the following conclusions:

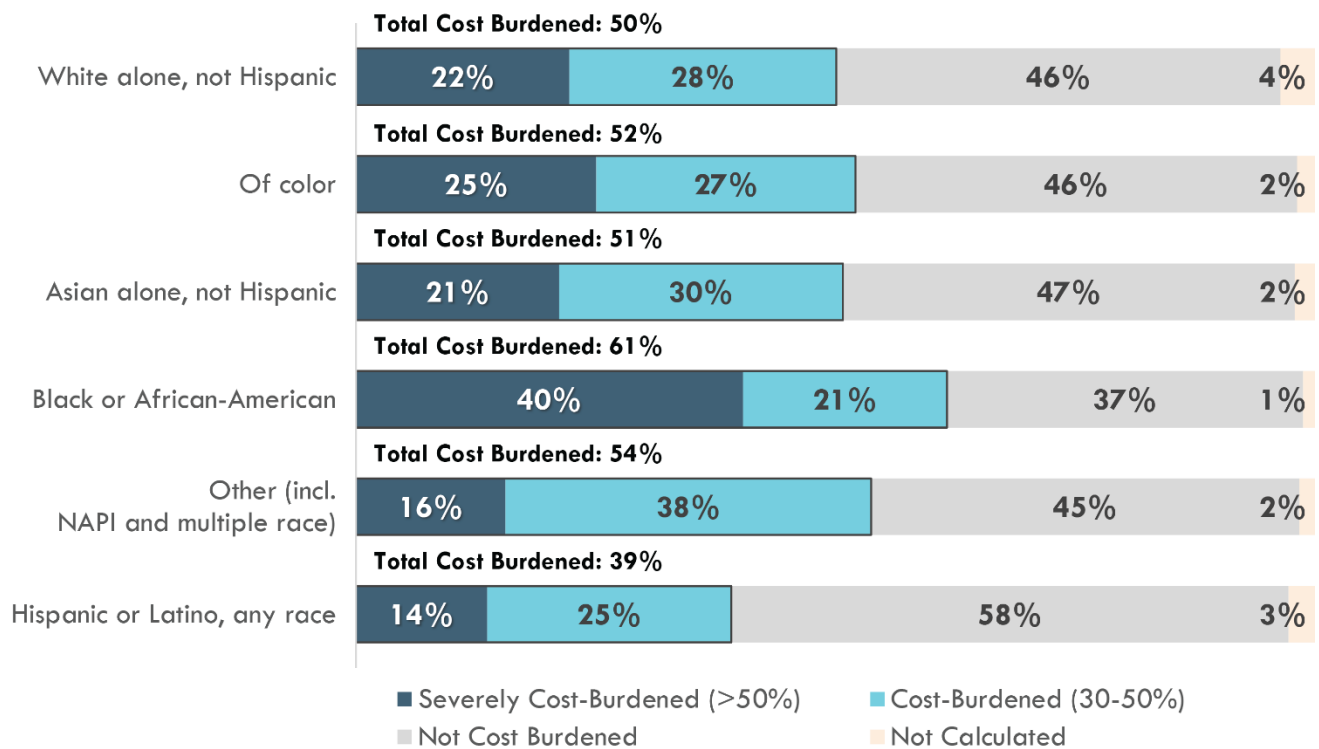
- **There is a significant lack of homeownership amongst BIPOC households compared to white households.** Although 53% of white households own their own homes, only 31% for households of color own. This breakdown is even more significant with certain subpopulations: around 78% of Black or African-American households rent, as well as 70% Hispanic/Latino households. This indicates that different demographic groups are experiencing a distinctly different access to certain types of housing, and highlights the vulnerability of these populations to shocks in the rental market. Increasing Lakewood’s capacity to house future population targets not only helps address the City’s housing needs, but can also provide more equitable opportunities for BIPOC communities to have access to affordable housing.
- **Black or African-American renters face significant cost burdens in the market.** Over 61% of Black or African-American households in Lakewood are facing a cost burden, with 40% experiencing severe cost burdens. This indicates that housing costs are likely too high for many of these households, which may need to be addressed through targeted policies. Community partnerships will be critical in meeting the needs of the Black and African American community in Lakewood. Additional housing affordable to the very-low and extremely-low income levels is needed.

Exhibit 60. Households by Race and Tenure, 2019.



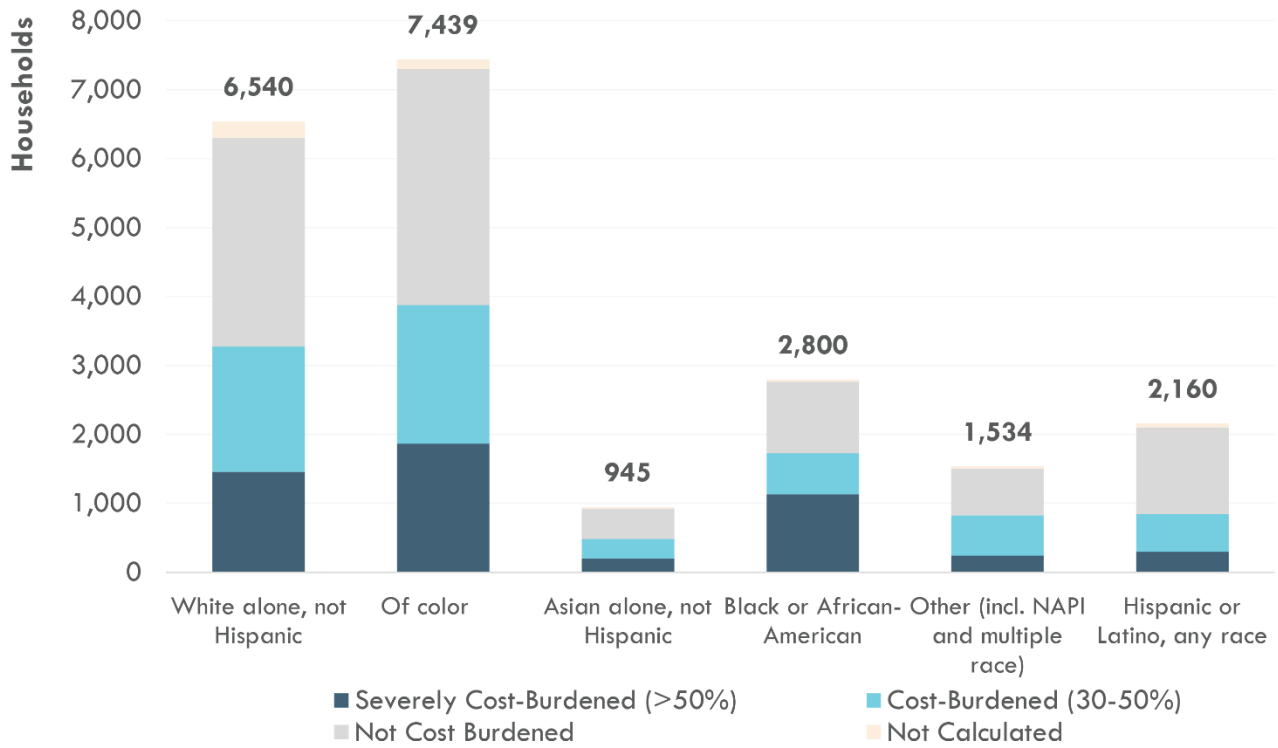
Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

Exhibit 61. Proportion of Renter Households by Race and Cost Burden, 2019.



Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

Exhibit 62. Renter Households by Race and Cost Burden, 2019.



Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

Geographical distribution measures

Metrics can highlight geographic areas where racially disparate impacts may be a greater concern. Those used in this report include:

- The CDC/ATSDR Social Vulnerability Index.
- The PSRC’s Displacement Risk Index and Opportunity Mapping Index.
- Census data on the distribution of populations by race, by census block.

These measures have been employed in the region before and when considered together, they can highlight some important patterns in the distribution of Lakewood’s future housing pressures.

Social Vulnerability Index

The Centers for Disease Control (CDC) and Agency for Toxic Substances and Disease Registry (ATSDR) have developed a Social Vulnerability Index (SVI) to identify populations vulnerable to significant impacts from hazardous events.⁷ This was intended to assist public health and emergency response experts to identify areas of extra concern in the event of a major event such as a natural disaster or chemical spill, but this has been adapted to other application as well.

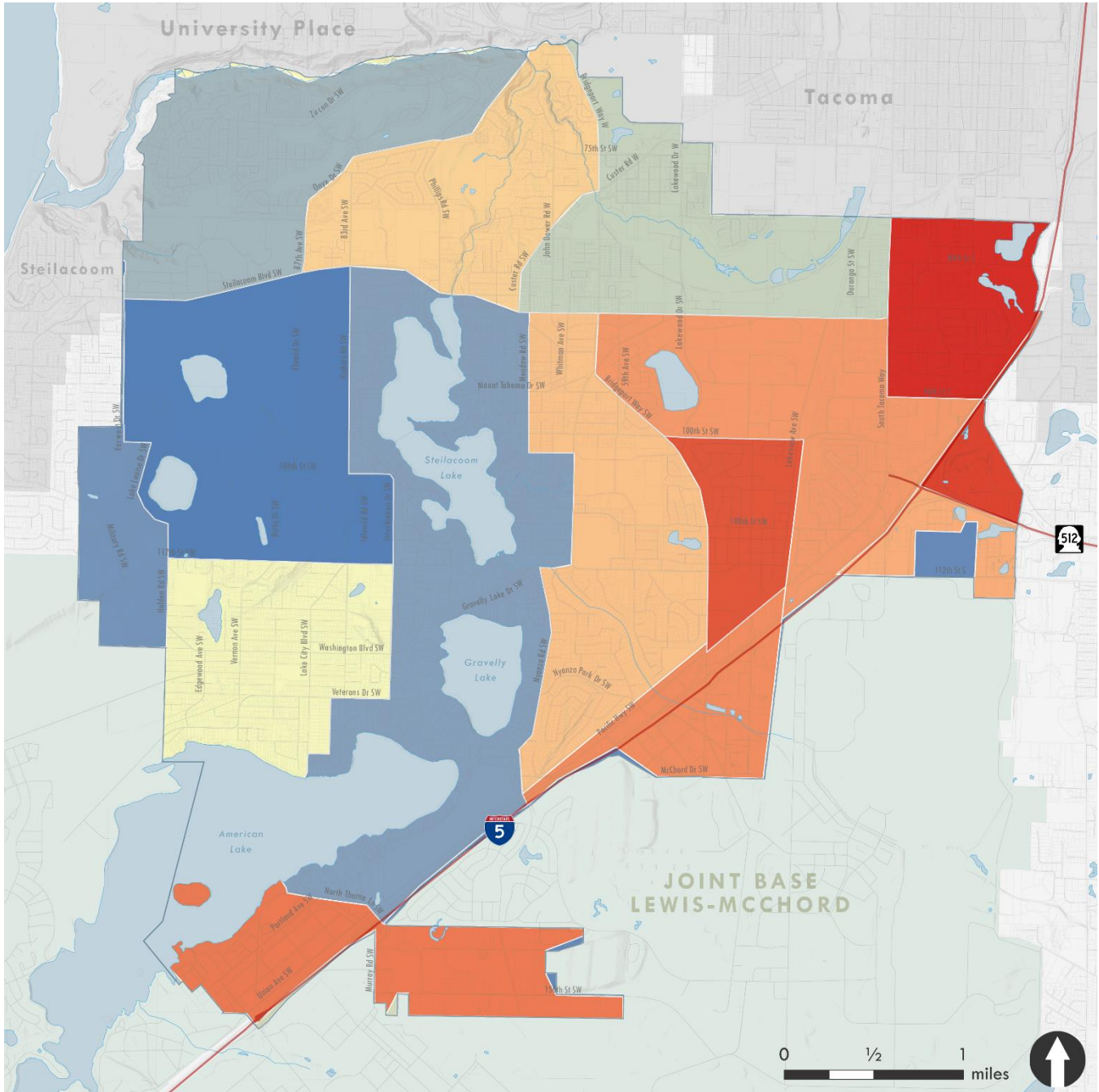
This metric identifies four groups of indicators that highlight particular risk factors for local populations:

- **Socioeconomic Status**, including poverty rates, unemployment, income, and adults without high school diplomas.
- **Household Composition and Disability**, including the proportion of children and seniors, single-parent households, and populations with disabilities.
- **Minority Status and Language**, including minority status and residents that speak English “less than well”.
- **Housing Type and Transportation**, including the number of multi-unit structures and mobile homes, crowding of households, households with no vehicles, and percentage of housing as group quarters.

These indicators’ aggregate index is shown for Lakewood in Exhibit 63. In this case, “high vulnerability” represents a situation where different factors can weaken a community’s ability to prevent human suffering and financial loss in a disaster, while “low vulnerability” can represent greater resiliency and access to resources to prevent significant impacts. The factors contributing to a lack of local capacity and resiliency are also strongly related to those factors that may impact a community’s ability to manage displacement pressures.

⁷ For more information on this metric, see the [CDC/ATSDR Social Vulnerability Index website](#), which includes resources describing the methodology in more detail and applications of the SVI to applications in emergency response.

Exhibit 63. Social Vulnerability Index by Census Tract, Lakewood.



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water

Social Vulnerability Index

- Low Vulnerability
-
-
-
- High Vulnerability

BERK
Map Date: January 2023

- Highways
- Arterials
- Roads

Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

PSRC Displacement Risk Index

The Puget Sound Regional Council (PSRC) updated a series of indicators in 2018 to highlight the locations across the region where businesses and households may have an increased relative risk for displacement and may require an additional policy focus to address affordability challenges from having a disproportionate impact on low-income households and households of color.

The **Regional Displacement Index** provided in Exhibit 64 identifies displacement risks by indicating Census tracts that have the highest combined score for 15 indicators related to major risk factors for displacement.⁸ These include:

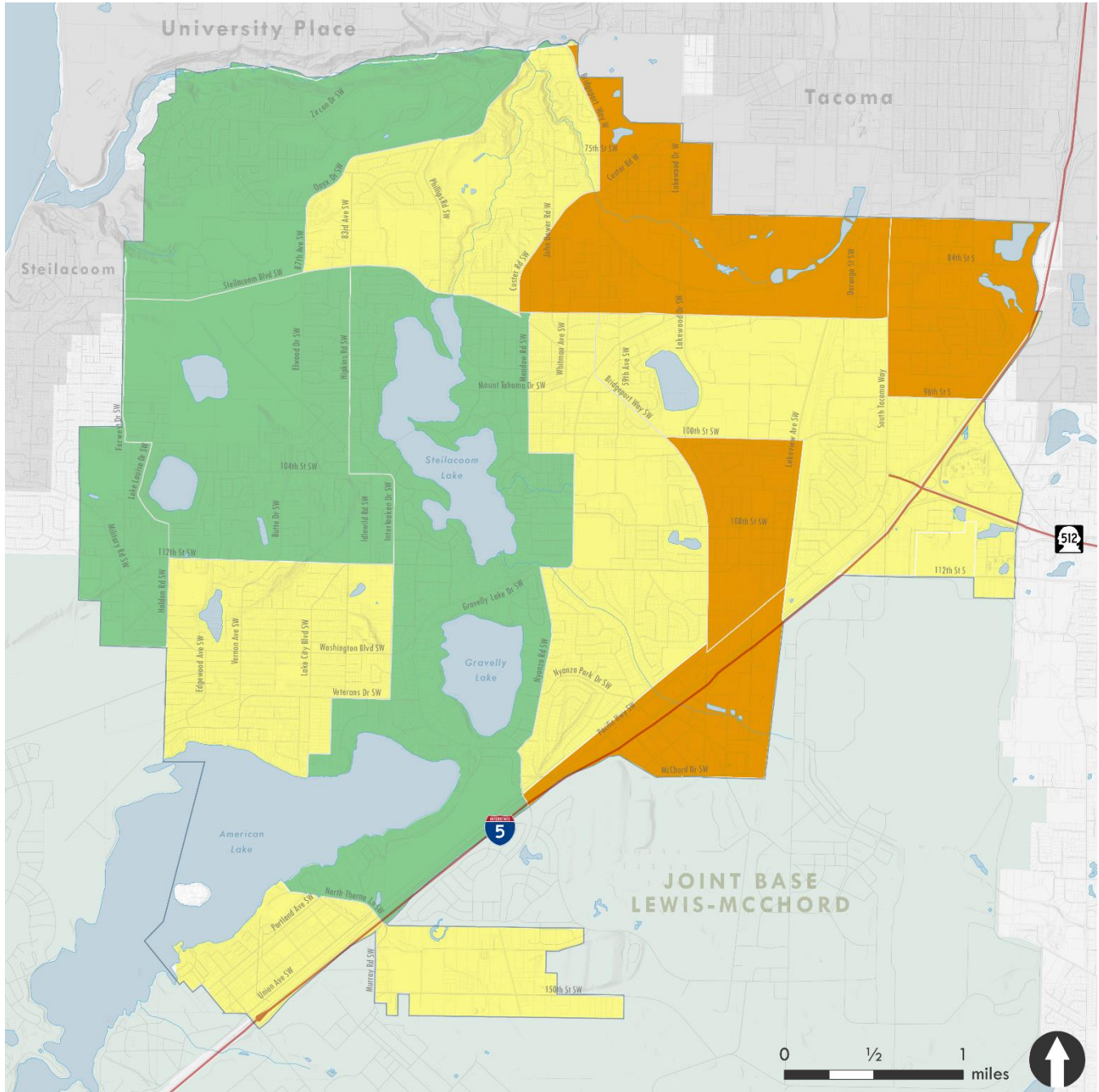
- **Socio-demographic characteristics**, such as populations of color, English language skills, proportion of renters, and household incomes.
- **Transportation access** in the local neighborhood, represented by access to employment and proximity to current and future transit.
- **Neighborhood characteristics**, including proximity to community businesses and public services, as well as locations close to high-income neighborhoods.
- **Housing**, including development capacity and median rent.

Altogether, these measures are aggregated to create a relative score to measure their displacement risk against other Census tracts in the region. These scores are used to group tracts into three different categories based on their relative risk:

- **“Higher”** risk (where scores in the top 10% of the score range)
- **“Moderate”** risk (scores in the top 50% but outside the top 10%)
- **“Lower”** risk (scores at the bottom 50% of the range)

⁸ For more details see [PSRC Displacement Risk Mapping: Technical Documentation](#).

Exhibit 64. PSRC Displacement Risk Index by Census Tract, Lakewood.



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water

PSRC Displacement Index

- Lower
- Moderate
- Higher



Map Date: January 2023

- Highways
- Arterials
- Roads

Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

PSRC Opportunity Mapping Index

PSRC's Opportunity Mapping Index highlights issues related to socio-economic resources and support available to residents to highlight geographic areas which may be opportunity-rich or opportunity-poor. While this is comparable to the Displacement Risk index, it relies on a broader set of measures that can highlight the resources available to local communities.⁹

Lakewood's aggregate Opportunity Mapping Index is provided in Exhibit 65, along with the combined indicators used to develop the index. Although Lakewood is considered to have "Low" or "Very Low" opportunity relative to other areas in the region under this measure, the differences between tracts can highlight variations in local opportunities across different categories.

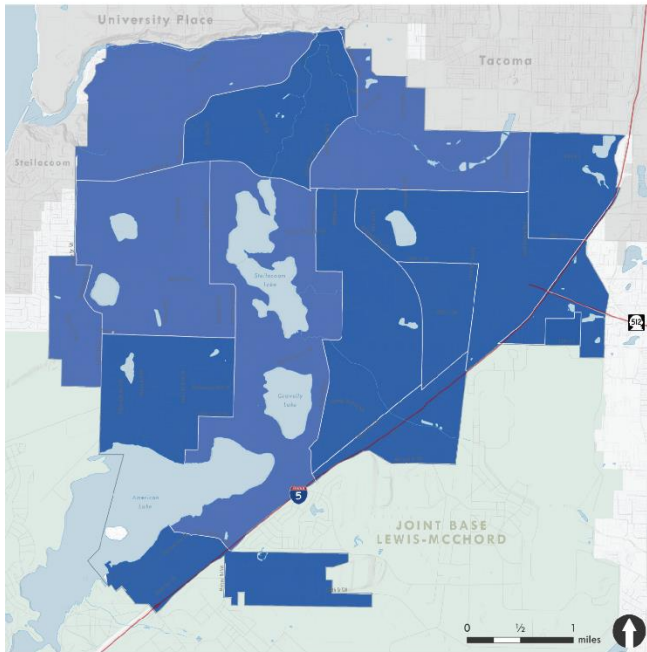
These measures are divided according to general categories, and include:

- **Education**, including local test scores and graduation rates (b).
- **Economic Health**, with metrics such as job growth and unemployment rates (c).
- **Housing and Neighborhood Quality**, including local vacancy and foreclosure rates, condition of local housing, and crime rates (d).
- **Health and Environment**, incorporating proximities to parks and sources of pollution (e).
- **Mobility and Transportation**, including transportation costs, walkability, and access to transit (f).

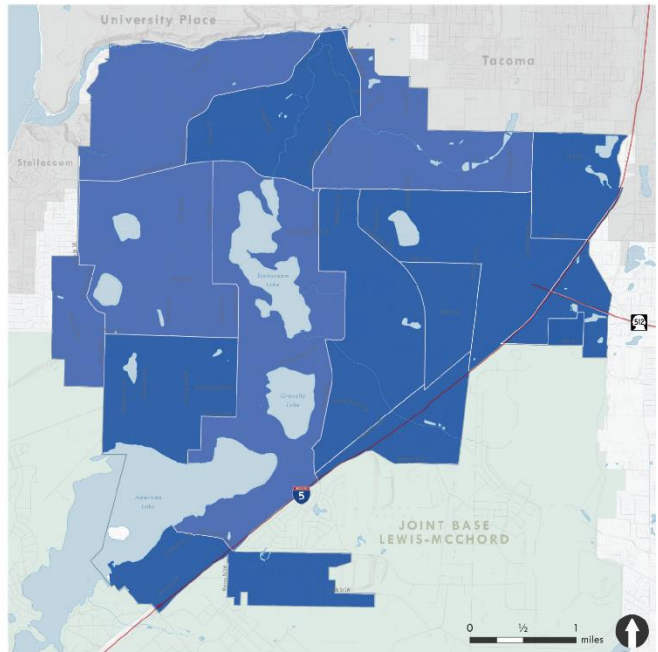
⁹ See [PSRC Opportunity Mapping Technical Addendum](#).

Exhibit 65. PSRC Opportunity Index by Census Tract, Lakewood.

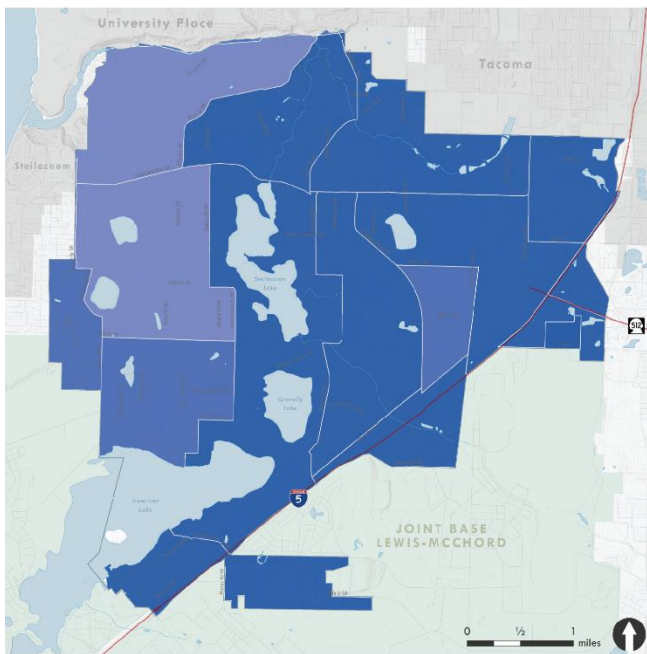
a. Opportunity Index



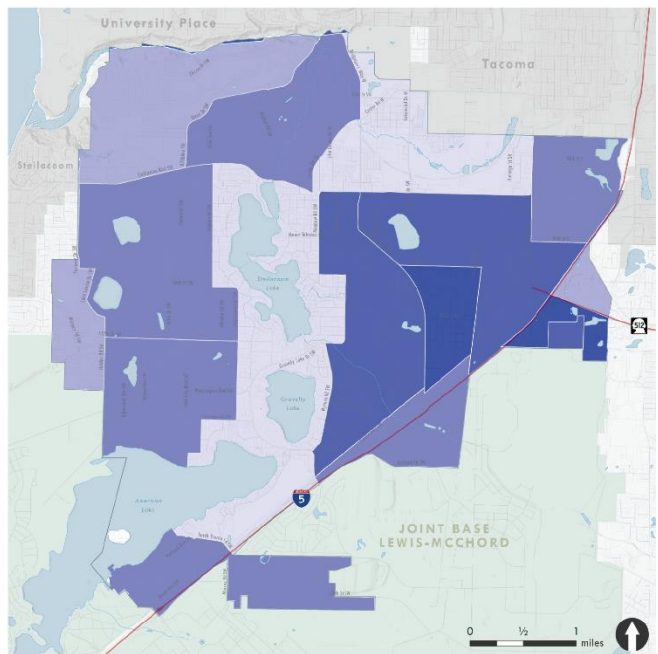
b. Education component



c. Economic Health component



d. Housing and Neighborhood Quality component



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water

PSRC Opportunity Index

- Very High
- High
- Moderate
- Low
- Very Low

- Highways
- Arterials
- Roads

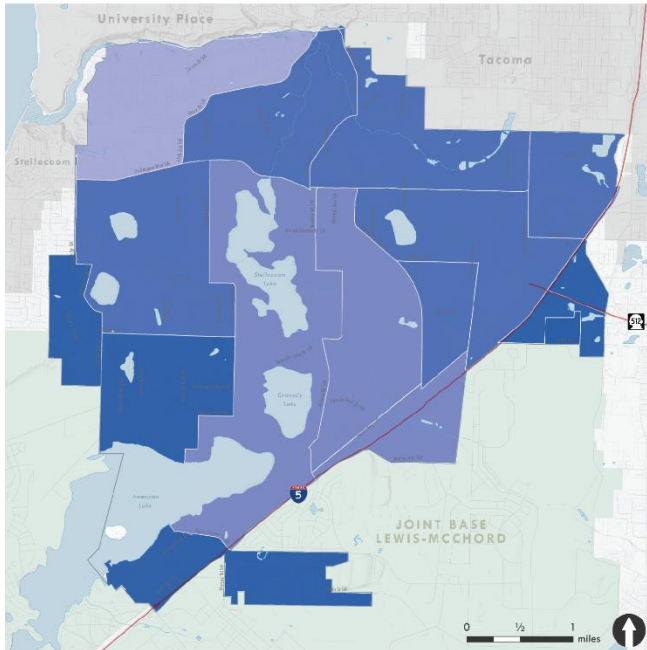


Map Date: January 2023

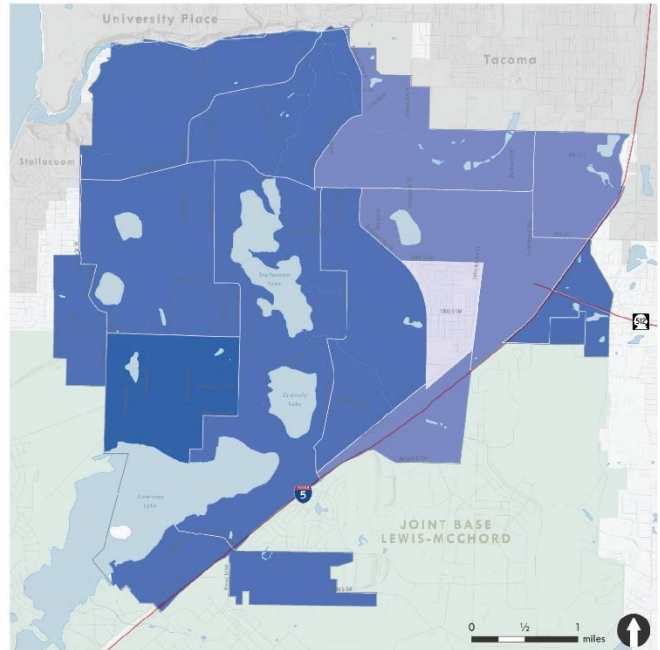
Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Exhibit 65 (continued)

e. Health and Environment component



f. Mobility and Transportation component



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water

PSRC Opportunity Index

- Very High
- High
- Moderate
- Low
- Very Low

- Highways
- Arterials
- Roads



Map Date: January 2023

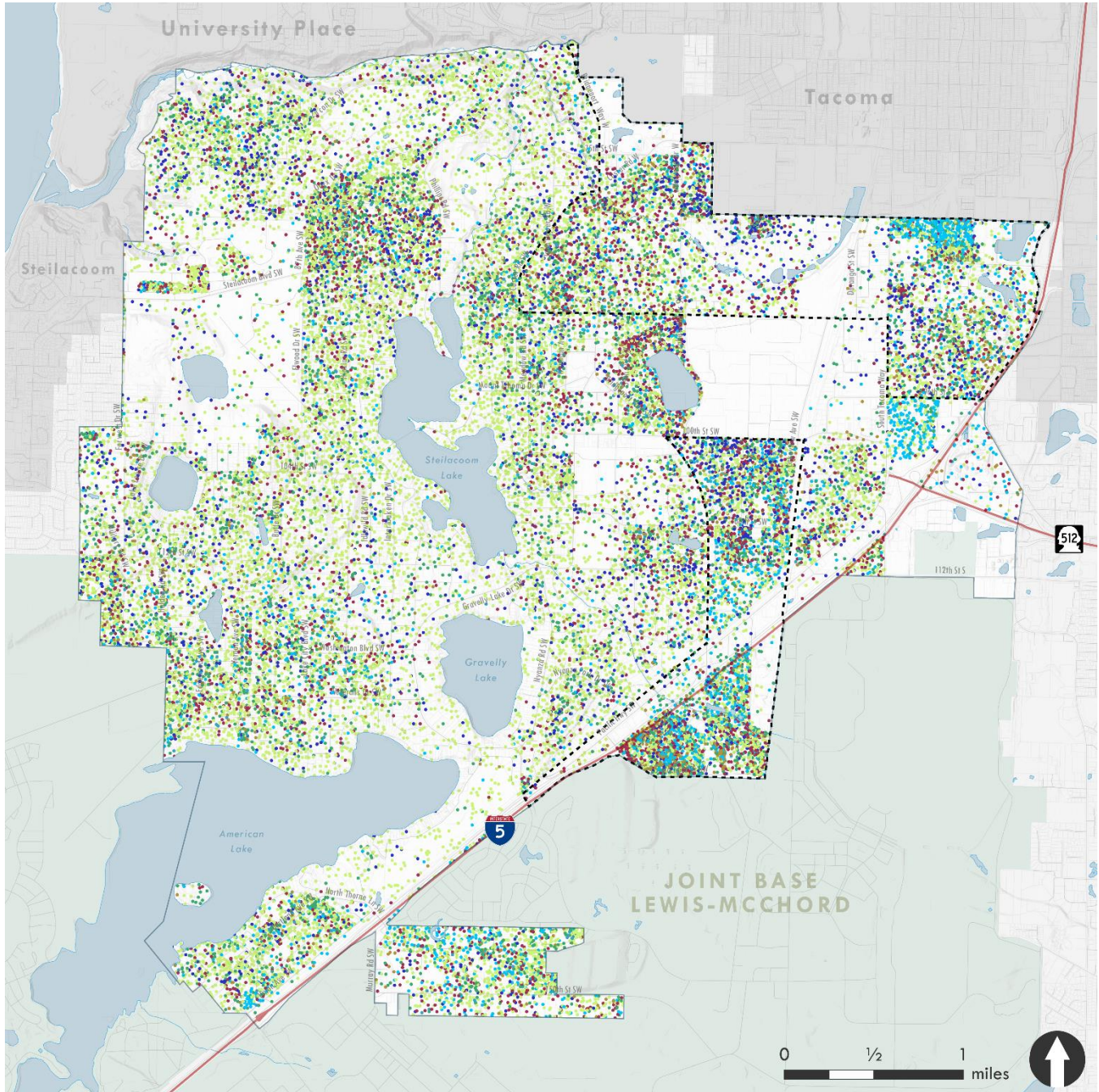
Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Distribution of population by race

Exhibit 66 provides a dot-density map to highlight the geographical distribution of race in Lakewood. Note that in this exhibit, population counts are divided by race and represented in a random dot pattern within individual Census blocks. This highlights not only the concentration of different groups in the city, but also how this may be related to population density. Major categories of race included in the Census are represented by different dot colors.¹⁰

¹⁰ Note the particular issue with “Some Other Race” dominating certain areas. This has been related to an increasing trend, as this category has increased by 129% nationally between the 2010 and 2020 Census. (See [“2020 Census Illuminates Racial and Ethnic Composition of the Country”](#) from the US Census Bureau.) This may relate to more multiracial perspectives on identity, as well as trends towards Hispanics/Latinos self-identifying in this way. See the Pew Research Center’s [“Measuring the racial identity of Latinos”](#) report for one particular discussion of this.

Exhibit 66. Distribution of Population by Race and Census Block, Lakewood.



Legend

- City of Lakewood
- Other cities
- Joint Base Lewis-McChord
- Water

Distribution of Population by Race

- White alone
- Black or African American alone
- American Indian and Alaska Native alone
- Asian alone
- Native Hawaiian and Other Pacific Islander alone
- Some Other Race alone
- Two or more races

- Highways
- Arterials
- Roads

- PSRC Displacement Index: Higher Risk



Map Date: January 2023

Sources: Pierce County GIS, 2022; ESRI, 2022; City of Lakewood, 2022; BERK, 2022.

Findings

From the geographic information presented above, there are several highlights that should be considered as part of future work:

- **There are distinct patterns of populations that may be at risk of displacement.** The largest concentrations of residents potentially sensitive to displacement are found on the eastern and southern edges of Lakewood. This includes the Lakeview/Kendrick neighborhood and the Lakewood Station District, as well as Springbrook, Tillicum, and the International District.
- **The most critical focus area for anti-displacement policies will be the Lakewood Station District and the Lakeview/Kendrick area.** Although different measures of vulnerability to displacement raise some Census tracts over others, the stability and welfare of these neighborhoods should be a consistent concern. These areas include higher population densities and a high proportion of populations of color; seeing significant new housing development in, and thereby encouraging displacement from, these areas could result in a racially disparate impact.
- **Businesses in the Lakewood Station area as well as in the International District may be at risk.** While these data highlight characteristics of Lakewood residents, there may be associated impacts to local businesses as well. In particular, businesses in the International District may be impacted if neighborhood changes result in increased pressures to relocate.

Auditing City Housing Policies for Equity

Introduction

Housing policies for Lakewood are primarily incorporated into major planning documents for the City, including:

- Lakewood Comprehensive Plan (2000, revised 2022)
- Tillicum Neighborhood Plan (2011, revised 2022)
- Lakewood Downtown Plan (2018)
- Lakewood Station District Subarea Plan (2021)

Additionally, the City's development regulations, which are primarily included in [Title 18A, Title 18B and Title 18C LMC](#), also reflect many of the City's priorities with respect to housing development.

When assessing racially disparate impacts in housing, the primary focus of a policy audit is focused on the major actions that can result from these policies.¹¹ Questions include:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide protection to communities of interest from displacement?

An evaluation of the major policy documents listed above is included below key elements that should be changed to address potential disparate impacts on different communities are identified. Additionally, this section discusses high-level guidance on how these documents can be edited to address drafting issues that may implicitly or explicitly reinforce issues of marginalization and exclusion.

Where practical, relevant policy excerpts are included for reference. These excerpts have been drawn from these documents as of January 2023; later changes made by the City are not included.

¹¹ These elements are drawn from the Department of Commerce [Racially Disparate Impacts Guidance](#); please refer to that document for more information.

Lakewood Comprehensive Plan (2000)

The current version of the [Lakewood Comprehensive Plan](#) does not include a distinct Housing Element¹². Instead, many of the City’s housing policies are incorporated into a substantial section on land use. As such, there are certain policies that may not necessarily be related to the provision of housing. On the other hand, there are additional policies in other sections that may relate to issues of housing accessibility, neighborhood quality, and ease of development which also need to be considered.

This assessment starts with elements of the Comprehensive Plan that should be highlighted as policies that already help to address exclusion in the community, and should be maintained in the Plan after revisions. Following are several categories of policies summarized where revisions could help to reduce racially disparate impacts and exclusion in housing.

The considerations in this section include the following:

- **Housing for high-income households.** Provisions in the Comprehensive Plan suggest that the City is promoting geographically distinct, exclusive neighborhoods with private amenities for high-income households. Encouraging integration and mixed-income neighborhoods can help to reduce exclusion.
- **Housing for moderate-income households.** Policies regarding moderate-income households include provisions for distributing this type of housing throughout the City, which is positive. However, low- and very low-income households should be receiving more support, especially with respect to any opportunities to encourage low-income homeownership.
- **Housing for low- and very low-income households.** A primary change in general for low- and very low-income housing will need to address state-mandated housing targets for these income levels. Additionally, policies that specifically encourage the housing to meet the needs of low- and very low-income households to be located in specific zones should also be addressed to encourage integration, and policies should recognize the needs for low-income housing preservation and family-sized housing.
- **Special needs housing.** The City provides a broad category for “special needs” housing, which combines senior housing, assisted living, and emergency and transitional housing to meet the needs of people at risk of homelessness. These policies should be separated by need, and elements related to transitional and emergency housing need to recognize recent state-level requirements for allowable areas and unit targets for these uses.
- **Neighborhood character.** While preserving and improving neighborhood amenities is an important goal, the City should ensure that efforts to maintain “neighborhood character” do not further restrict affordable housing options through additional design requirements. Similarly, efforts to improve urban design in neighborhoods should also explicitly provide support for low-income neighborhoods and neighborhoods of color.

¹² The need for a housing element for a Comprehensive Plan is defined under [RCW 36.70A.070\(2\)](#). The upcoming revisions to the City’s Comprehensive Plan are expected to include a separate housing element to meet these requirements.

- **Anti-displacement policies.** The Comprehensive Plan includes some considerations to monitor displacement and provide support in cases where federal funding mandates require action. However, the City should also work to include provisions to preserve naturally-occurring and subsidized affordable housing, and ensure that displaced households are provided support even in the case of private projects.
- **Commercial businesses.** While policies regarding commercial development and business support are included in the sections on land use and economic development, there are no policies which recognize the specific needs of many of the businesses owned by people of color in the community. Providing specific policies not only to provide targeted support but also to highlight the benefits these businesses provide and commit to minimizing the displacement of these businesses.

Housing for High-Income Households

While the need to provide housing for households at all income levels is an important consideration, there is a particular focus in the Lakewood Comprehensive Plan on providing high-income housing that run counter to RDI and correcting historical exclusion. Goal LU-2 is an objective to “Increase housing opportunities for upper-income households”, which provides the following policies:

- LU-2.1: Target ten (10) percent of new housing units annually through 2030 to be affordable to upper income households that earn over 120 percent of county median income.*
- LU-2.2: Encourage the construction of luxury condominium adjacent to the lakes.*
- LU-2.3: Support site plans and subdivisions incorporating amenity features such as private recreation facilities, e.g., pools, tennis courts, and private parks to serve luxury developments.*
- LU-2.4: Increase public awareness of upper income housing opportunities in Lakewood.*

This can be a complex issue for city policy, as high-income housing can provide for more property and sales tax revenue. Additionally, the implicit targets included under the Department of Commerce guidance suggest that Lakewood would need to accommodate 28% of their housing target as high-income housing, exceeding the target indicated in the current policy.

However, there is some concern about these policies:

- **These policies place the focus of attention on high-income housing over other housing needs.** A policy focus on high-income housing implies that this is a priority for the City, especially in cases where language like “encourage” and “support” are used. This suggests that this may be using City resources that could be assigned elsewhere.
- **Private amenities for high-income households would exclude other residents.** Encouraging private amenities for high-income developments can effectively exclude other households from using them, which may be especially problematic if development regulations would otherwise require public amenities to be provided.
- **Policies do not allow for the distribution of high-income housing.** While provisions for middle-income housing include a note that it should be dispersed across all areas of the City (LU-2.12), similar provisions for high-income housing are not included in policy. This suggests that high-income

housing will continue to be separated, especially considering that LU-2.2 indicates that luxury condominiums should be targeted to specific areas. Distributing high-income housing can potentially have positive effects, as mixed-income housing can have positive benefits for lower-income households.¹³

Providing for greater integration of housing types can help to provide more benefits for a wider range of people, and potentially address many of the disparate impacts that may be experienced between different areas. Edits should work to clarify how and where the City can leverage housing intended for high-income households to gain public benefits for the community overall. While concerns such as fiscal sustainability should also be addressed through policy, other approaches in the Plan can be used to manage the associated underlying equity issues.

Housing for Moderate-Income Households

Goal LU-2 also includes an objective which states that the City will “encourage the private sector to provide market rate housing for the widest potential range of income groups including middle income households.” This focuses on moderate-income housing, and includes policies such as:

LU-2.5: Target sixty-five (65) percent of new housing units annually through 2030 to be affordable to middle income households that earn 80 to 120 percent of county median income.

LU-2.6: Encourage home ownership opportunities affordable to moderate income households.

LU-2.7: Encourage the construction of townhouse, condominium, and rental units affordable to moderate income households in residential and mixed-use developments and redevelopments.

LU-2.11: Pursue public-private partnerships to provide for moderate-income housing.

LU-2.12: Disperse middle-income housing in all areas of the City.

Note that changes to these targets under LU-2.5 will be necessary due to the targets by income level as calculated by the Department of Commerce and adopted by Pierce County for Lakewood. These targets are significantly lower than LU-2.5’s 65%, and Plan policies require some realignment as a result.

Additionally, there are other considerations involved with issues of potential exclusion:

- **The policies do not highlight the important role of low-income homeownership.** Homeownership opportunities are specifically called out for moderate-income households, but in certain cases there may be options for lower-income households to access opportunities for homeownership and thus begin to build wealth over time. This can potentially be facilitated through partnerships with community land trusts (CLTs) and other housing organizations.
- **The use of public resources for moderate-income housing can divert resources from other needs.** Rather than directing that the City pursue public-private partnerships to provide for moderate-income housing, policies can instead focus public resources should be directed towards communities with greater needs.

¹³ See [Mixed-Income's Anticipated and Realized Benefits](#) (2013) from the Urban Institute for a summary of many of these benefits. Note that while there are benefits to mixed-income housing, this may also require additional policy changes to realize other advantages, such as improvements in economic well-being.

- **Incorporating middle-income housing in mixed-income development should consider displacement.** The goal of distributing middle-income housing throughout the City should be highlighted as a way to promote mixed-income communities. However, this consideration should be tempered by other policies to anticipate and manage the potential resulting displacement of lower-income households.

Combining these policies with other income-targeted policies in the Comprehensive Plan can ensure that housing will meet the needs of different income groups in the City consistently.

Housing for Low- and Very Low-Income Households

Goal LU-2 includes a discussion of housing for low- and very low-income households, with the stated objective to “Provide a fair share of low-and very low-income housing in the future.” This section has a clear need for editing to address issues of housing exclusion.

The immediate need for a rewrite is with respect to the objective itself. While the basis for this statement is important to consider, as less expensive housing may result in lower tax revenues and impacts to municipal budgets, discussing a “fair share” implies a burden to the City from certain residents that are lower income and more likely to be people of color. Policies can work to address these concerns without suggesting that certain people are not welcome in the community.

Several policies under Goal LU-2 need to be revised per state law and multicounty and countywide planning policies:

- LU-2.14: Maintain a sufficient land supply and adequate zoning within the City to accommodate 25 percent of the City’s projected net household growth for those making less than or equal to 80 percent of county median income.*
- LU-2.15: Establish the following sub-targets for affordability to households earning 50 percent or less of county median income, to be counted to toward the 25 percent target:*
 - *Fifteen (15) percent of new housing units constructed in the City;*
 - *A number equal to five (5) percent of new housing units, to be met by existing units that are given long-term affordability; and*
 - *A number equal to five (5) percent of new housing units, to be met by existing units that are purchased by low-income households through home-buyer assistance programs.*
- LU-2.18: Disperse low-income housing in all mixed-use and multi-family land use designations that allow attached dwelling units.*
- LU-2.20: Reduce existing housing need, defined as the number of existing households that earn 80 percent of county median income, and are paying more than 30 percent of their income for housing, or live in inadequate housing by increasing housing supply for all economic segments of the community.*
 - *Create opportunities for higher income households to vacate existing lower cost units, by creating a variety of market rate detached and attached housing types; and*
 - *Prioritize applications to the City for housing rehabilitation grants to homeowners earning 80 percent of county median income or below based on the greatest degree of existing need. With*

the exception of emergencies, priority should be given to households occupying conventional housing.

Considerations when revising these policies include the following:

- **Future housing targets include mandated allocations by income level.** At a broad level, the primary policy need for this section is to include considerations of different income levels, including not only low-income (50–80% median income), but also very low- (30–50%) and extremely low-income (0–30%) households. This would be reflected in the final targets discussed in Part 2.
- **Meeting low-income housing needs should provide support for different sizes of housing.** Although there are clear statements about maintaining targets for housing intended for lower-income households, this section should also consider the needs for family-sized housing versus only smaller housing units. Larger households that have lower income will usually have greater pressures to uprent or experience overcrowding, and can have a harder time trying to find naturally occurring affordable housing in the market.
- **Existing affordable housing should be preserved.** While the policy focus on preserving affordable housing in LU-2.15 can be important, using existing housing exclusively to meet affordability targets should be approached with caution. These efforts need to be explicit and distinguished from providing new opportunities for accessing affordable housing.
- **The general geographical constraints on low-income housing can provide a problematic mechanism for exclusion.** Policy LU-2.18 explicitly indicates that the needs for low-income housing will need to be met in mixed-use and multifamily areas. This explicitly supports geographical exclusion of lower-income households. While these zoning districts are likely to be the ones that can support the housing types that can meet the needs of these households, this type of policy should instead focus on integrating opportunities for lower-income housing across the City in mixed-income neighborhoods.
- **There is a lack of explicit anti-displacement policies in the Comprehensive Plan for lower-income households.** While monitoring losses of affordable housing is considered later as part of Goal LU-5, stronger efforts should be included in the discussion of affordable housing options to ensure that displacement can be minimized and impacts to lower-income households can be reduced.

Special Needs Housing

Goal LU-3 indicates that the City shall “ensure that there are housing opportunities for people with special needs, such as seniors, people with disabilities, and the homeless.” This is paired with a specific objective to increase the supply of this type of “special needs” housing.

There are several policies included in this section that are positively oriented to providing housing for these individual groups in the community, such as Policy LU-3.1, which encourages an even distribution of these uses across “all residential and mixed-use zones”, and Policies LU-3.4 and 3.14, which explicitly express support for emergency shelters and supporting services.

These policies should be expanded and adjusted as follows:

- **Future housing targets must include mandated transitional and supportive housing targets.** As per requirements under [RCW 36.70A.070\(2\)](#), the City will need to include projected needs for emergency housing, emergency shelters, and permanent supportive housing under (a)(ii) and identify sufficient capacity for these uses under (c). These housing types are being addressed in the 2023 Comprehensive Plan amendment cycle, but should also be reviewed under the 2024 periodic review racial disparity and equity lens for potential needed amendment.
- **Clarity should be provided to distinguish policies for different types of special needs housing.** While this section provides a broad base for establishing City policy on specialized housing types, the objective covers a lot of disparate types of uses that may have different needs. Senior housing and assisted living can address a range of different possible uses with different needs, and in turn these facilities are often different than transitional and emergency housing facilities. These policies should explicitly note each use and address each distinctly..
- **Policies must be updated to reflect state requirements to site emergency and transitional housing.** E2SHB 1220 as adopted by the State Legislature has specifically restricted cities from excluding transitional and permanent supportive housing from areas that allow any residential development, and prevent cities from excluding emergency shelters in areas where hotels are allowed.¹⁴ This would include C1–C3 commercial zoning under [LMC 18A.40.090](#), but management of these uses had not been acknowledged in either the zoning code or the Comprehensive Plan as of 2022. These are being addressed in the 2023 Comprehensive Plan amendment cycle, but should also be reviewed under the 2024 periodic review racial disparity and equity lens for potential needed amendment.
- **Incentives should be provided for other types of special needs housing beyond senior and disabled housing.** Under LU-3.11, the City is encouraged to provide density and height benefits to senior and disabled housing as appropriate. Extending these incentives to other types of special needs housing could allow these facilities to be more readily built in the community.

Neighborhood Character

The discussion of “neighborhood character” can be a challenging one when viewed through a racial equity lens. While on one hand, maintaining livable, high-amenity neighborhoods should be a priority for all communities, efforts to maintain neighborhood character can often be more vague and subjective. Generally, more overly-protectionist approaches to preserving neighborhood character have led to situations where certain members of the community are implicitly or even explicitly excluded from certain neighborhoods. Policies intended to maintain neighborhood quality will need to strike a balance to ensure that this does not lead to further exclusion.

Neighborhood character under the current plan is managed in part under Goal LU-4 (“Maintain, protect, and enhance the quality of life of Lakewood’s residents”) with the objective: “Develop and maintain

¹⁴ [RCW 35.21.689](#) initially prohibited cities from excluding supportive housing from multifamily areas. Changes under [RCW 35A.21.430](#) and [E2SHB 1220](#) in 2021 mandated that transitional and emergency housing can only be excluded from areas where hotels are permitted if a city authorizes indoor emergency shelters and housing in a majority of the zones within a one-mile proximity to transit.

livable neighborhoods with a desirable quality of life.” Several of these policies need to be amended due to concerns about exclusion, including the following:

- LU-4.2: High-density housing projects, with the exception of senior housing, will not be permitted in existing single-family residential neighborhoods. More moderate densities such as planned development districts and cottage housing will be considered.*
- LU-4.15: Promote high quality residential living environments in all types of neighborhoods.*
- LU-4.18: Protect the character of existing single-family neighborhoods by promoting high quality of development, including through planned development districts (PDDs.)*
- LU-4.19: Use design standards to encourage housing types that protect privacy, provide landscaping or other buffering features between structures of different scale, and/or promote investments that increase property values where housing that is more dense is allowed in existing single-family neighborhoods.*
- LU-4.20: Development standards for flats and triplex developments should encourage design at the scale of single-family developments by limiting building length and heights.*
- LU-4.21: Relate the size of structures to the size of lots in order to create development that fits into a neighborhood.*
- LU-4.22: New single-family subdivisions should provide pedestrian and vehicular connections to adjoining residential development unless a determination is made that a physical features of the site, such as a ravine, wetland or pre-existing developed property prevents practical implementation of this provision.*

In addition to this goal, the Urban Design chapter includes several goals that are related to neighborhood character. Relevant goals include:

- UD-1: Design streets and associated amenities so that they are an asset to the city.*
- UD-2: Establish a system of gateways and civic boulevards to provide identity to the city, foster appropriate commercial uses, and enhance the aesthetic character of the city.*
- UD-3: Employ design standards to ease the transition of scale and intensity between abutting residential uses and between residential areas and other uses.*
- UD-7: Promote pedestrian-oriented development patterns within designated mixed-use commercial districts.*
- UD-8: Develop the design of the CBD to support its role as Lakewood’s Downtown.*
- UD-9: Create a livable, transit-oriented community within the Lakewood Station District through application of urban design principles.*
- UD-10: Promote the evolution of Tillicum into a vital higher density pedestrian-oriented neighborhood through application of urban design principles.*

UD-13: Provide funding for urban design and open space improvements necessary for maintenance and improvement of the quality of life in Lakewood.

UD-15: Substantially increase walking and cycling activity while at the same time reducing collisions involving cyclists and pedestrians. The federal government and the State of Washington seek to double walking and cycling activity over the planning horizon, while at the same time reducing collisions involving cyclists and pedestrians by 5% per year.

With respect to the policies above, there are three major considerations to address:

- **Design requirements should not constrain new development allowed in an area.** Lakewood’s housing policy, zoning and regulations need to be explicit that neighborhood design requirements are not intended to restrict development, especially multifamily development, from areas where it is allowed. While new projects will change urban form, the design requirements that can result from these policies can restrict height and floorplate allowed on a site, as well as increase project costs from additional design details. In cases where only multifamily development is subject to these requirements, more detailed design requirements can exclude more dense types of housing from certain neighborhoods even when allowed. This in turn can reduce the stock of more affordable new housing options.
- **Denser forms of development should be allowed away from arterials and major centers.** Outright exclusions of “high-density housing projects” from single-family residential neighborhoods (excluding senior housing) in Policy LU-4.2 implies that any multifamily project would not be allowed in many neighborhoods. Additionally, there are several policies that suggest that multifamily housing should be limited to arterials and major centers, which suggests that these developments should serve as a buffer against noise and air pollution. 2023 state bills 1110 and 1337 significantly change what is required of cities related to allowing multiple units per lot, accessory dwelling units, and allowed regulation of parking; Lakewood’s Plan and regulations must comply with these laws.
- **Provisions for improved pedestrian and cycling access, neighborhood parks, and other amenities should be distributed to serve all residents.** There should be explicit policies in place that recognize that needs in low-income neighborhoods and neighborhoods of color should be specifically considered for expansions to amenities.

Anti-Displacement Policies

Under Goal LU-5, the City of Lakewood establishes a level of oversight on displacement by including a specific goal to “recognize relocation issues brought about by demolition or conversion to another use.” The policies under this goal (LU-5.1 through 5.4) cover three main elements:

- Monitoring changes in affordable housing in the community due to demolition, conversion, deterioration, and area-wide redevelopment efforts.
- Enforce existing federal law regarding financial and relocation assistance for people displaced by housing projects using federal funds.
- Considering the use of CDBG funds for relocation assistance related to displacement.

While there are specific cases where the City has provided other, more extensive protections against displacement,¹⁵ there are currently no provisions for anti-displacement policies in the Comprehensive Plan related to private development, especially as related to low-income neighborhoods and communities of color. Such policies must be added as part of the 2024 periodic review.

Commercial Businesses

Provisions for supporting community businesses are distributed throughout the Comprehensive Plan, with Goals LU-21 through 29 covering commercial land use management, and broader economic development strategies included in the Economic Development Element in Chapter 5. However, none of these policies specifically identifies businesses in communities of color as something that requires additional policy attention and potentially protection against commercial displacement. Areas such as the International District should be specifically called out as one location where a diverse range of businesses serving both the community and local residents of color is strongly supported.

Similarly, policies such as ED-2.5 (“Provide targeted assistance to businesses that may be unsophisticated in permitting and licensing requirements.”) should be amended to reflect that “sophisticated” businesses may face language and cultural barriers when dealing with the City. Other policies should be updated to consider how best to accommodate comparable considerations with City operations.

Tillicum Neighborhood Plan (2011)

The [Tillicum Subarea Plan](#) was approved in 2011 to guide planning and development in the Tillicum community, and updated in 2022 to include a status update about the action items completed to date.¹⁶ In this Plan, several challenges were originally identified:

- The need to build community capital to address local issues.
- Perceptions of public safety issues.
- The role of freeway-oriented commercial development in the area.
- Needs for cohesive design and transitions between different areas.
- Management of signs for I-5 traffic.
- Needs for additional rights-of-way for Union Avenue SW.
- Improvements in gateways and urban design.
- Development of alleyways to improve the street network.

This Plan was based in part on an earlier [2009 conceptual plan](#) and vision from BCRA that examined six key initiatives:

- Maple Street link

¹⁵ For example, note the vacancy requirements and requirements for displacement assistance for the City’s MFTE program as per [LMC 3.64.020\(E\)\(6\)](#), which exceeds the requirements for relocation assistance mandated by the state.

¹⁶ Note that as per [City Ordinance 772](#), the Tillicum Subarea Plan will be updated as part of the update to the City’s Comprehensive Plan in 2024.

- Union Avenue commercial/retail
- Multifamily note fronting Harry Todd Park
- Harry Todd Park entrance realignment
- Gateways at either end of Union Avenue
- Pedestrian/bike path loop

This subarea plan is dominated by physical planning and design considerations, with a focus on actions to take to catalyze redevelopment in the community. As such, policies and actions to address equity and exclusion issues are minimal.

Nine goals are put forward as part of the Tillicum Neighborhood Plan, with corresponding tasks to be included in the City's work planning:

- **Goal 1: Develop community capacity.** Encourage neighborhood leadership development and collaborative community involvement as a means of grassroots problem-solving.
- **Goal 2: Update infrastructure.** Complete the sewer, water, and storm water infrastructure projects that are currently funded in the Tillicum and Wood brook neighborhoods. Support the efforts of the school district to provide quality school facilities that function as focal points for family and community activity. Maintain a six-year capital facilities plan as a basis for seeking grants.
- **Goal 3: Reduce crime and neglect.** Enhance the ability of Tillicum citizens and the Lakewood Police Department to minimize crime through stepped up property maintenance enforcement and the implementation of public outreach programs.
- **Goal 4: Improve transportation into and within the area.** Minimize the growth of traffic congestion. Balance the need for property access with traffic safety considerations. Apply standardized set of street classifications. Find new sources of revenue to upgrade streets and key intersections in Tillicum.
- **Goal 5: Revitalize and upgrade residential and commercial areas.** Identify where more dense, mixed-use development can be used to offer affordable housing opportunities within walking distance of amenities. Improve residential areas and streets to enhance the neighborhood appeal.
- **Goal 6: Provide a mix of housing opportunities.** Enhance social and economic diversity within Tillicum by mixing affordable housing in with new market-rate development.
- **Goal 7: Expand access to American Lake.** Make American Lake more accessible to Tillicum residents and visitors by identifying and enhancing more public access points to the lake, providing public amenities, and improving disabled access to the shoreline.
- **Goal 8: Enhance and protect Tillicum's natural environment.** Protect forest cover, riparian habitat, air quality, and the quality of groundwater flowing into American Lake.
- **Goal 9: Maintain a sensitivity to the area's history and historical elements.** Promote Tillicum's unique heritage, foster civic pride and honor past accomplishments, and use landmarks as a means to advance economic redevelopment.

These goals present a strong basis for planning efforts for housing in the neighborhood. The 2022 update provided an overview of the tasks completed by the City and its partners since the subarea plan's adoption, particularly sewer, stormwater, and other utility expansion, which were previously identified as a limitation to new development.

As the Tillicum Neighborhood Plan is updated in 2024, there are key elements which should be addressed regarding housing equity:

- **Further efforts are needed to develop community capacity and link this effort to City initiatives.** Per the 2022 update, community outreach goals with an end date of 2015 were as yet not completed, including both the establishment of a community leadership team and funding for youth in the community. These goals should be tied into efforts to engage the local neighborhood association, but also consider approaches to engage with residents of color in Tillicum to ensure clear representation.
- **Affordable housing incentives have not been rolled out to the Tillicum neighborhood.** Under Task F-15, the City was looking to consider the Multifamily Housing Property Tax Exemption (MFTE) incentive for the neighborhood to encourage multifamily development in the neighborhood. Additionally, tasks E-11, F-2, and F-5 also indicate efforts by the City that would encourage development of affordable housing options. To date, these tasks have not been completed. New incentives could look to encourage the development of affordable housing in the Tillicum area, especially if new development is promoted in the neighborhood. This may include expansions of the incentives under [Chapter 18A.90 LMC](#), as well as the extension of the residential targeted areas for the MFTE program under [Chapter 3.64 LMC](#).
- **Clear anti-displacement policies should be included as part of planning for the Tillicum neighborhood.** While the City has included several implementation steps to manage the impacts of substandard housing and provide support for tenants displaced by enforcement actions, there is no approach identified to address issues of displacement. There is a significant amount of market-rate housing in the Tillicum area that provides more affordable options for households, and any losses of these units may need to be coordinated with efforts to preserve and develop affordable housing options.
- **The Neighborhood Plan should address displacement risks due to new infrastructure.** With the completion of two new I-5 interchanges in Tillicum and the continuing expansion of sewer lines, the City should be proactively considering the risks of both residential and commercial displacement in Tillicum within the Plan.

Lakewood Downtown Plan (2018)

Since 2018, Lakewood has been working through the City's [Downtown Plan](#) to redevelop the Central Business District (CBD) zone as the “heart” of the city: a rich urban area with civic amenities, walkable streets, and a mix of uses such as housing, entertainment, restaurants, and retail. This is primarily related to coordinating a transition from an area dominated by auto-oriented “big box” stores and shopping centers into a central neighborhood for the community.

The overall design concept includes:

- A green loop for circulation and green space
- A new, denser street grid
- A new urban park of between two to four acres is proposed just north of City Hall
- A revised road design for Gravelly Lake Drive SW
- Catalyst sites for redevelopment
- A “festival street” along Motor Avenue

To achieve the vision and goals of the Plan and fulfill the overall design concept, the Plan also includes policies and strategies in several topics:

- Urban design + land use
- Economic development
- Housing
- Street grids, streetscapes & public spaces
- Transportation
- Parks, open spaces, & trails
- Stormwater and the natural environment
- Utility infrastructure (water, sewer, power)
- Community partnerships and organization

Because of the nature of the area, the Downtown Plan is focused on redevelopment of existing commercial uses and does not pose a significant displacement risk for an existing community. However, there are some elements to consider that can help reduce exclusion from the new community envisioned for the area:

- **The Plan should incorporate clearer definitions of “cultural diversity” and their relation to City policy.** There are discussions of the role of cultural diversity in the Downtown included as part of the Plan, but there are few definitions of what this means in practice. While the Downtown includes a library, museum, and theater, there is also a broader potential definition of what cultural diversity means and how it can be supported through initiatives such as placemaking and the provision of public amenities in the Downtown.
- **Policies should be in place to support housing affordability and access.** While there are policies for diverse types of housing that are accessible to all income levels in the Downtown, the provisions in the Plan do not include clear policies to encourage housing affordability and access. Currently, the only clear policy related to affordable housing is to “engage affordable housing organizations about opportunities and partnerships to increase housing in the Downtown”¹⁷. The City has included

¹⁷ See pages 37 and 63 of the [Lakewood Downtown Plan](#).

the Downtown in the local MFTE program¹⁸, but other programs and policies should be employed as well to encourage affordable housing in the Downtown.

Lakewood Station District Subarea Plan (2021)

The Lakewood Station District is a multi-modal commuter hub of Lakewood and the southern terminus of Sound Transit's commuter rail service. The intention of the [Lakewood Station Subarea Plan](#) is to develop a transit-oriented neighborhood surrounding the commuter rail station that includes a mix of intensive land uses and activities as part of a high quality, pedestrian-oriented urban environment. This regional transit access can allow for greater densities of development and support the creation of a cohesive neighborhood.

Under the Plan, policies are explored in multiple areas:

- Land use and urban design
- Housing
- Economic development, business, and employment
- Transportation
- Utilities and services

A major component of the Plan is the development of a hybrid form-based code that can provide greater control of the impacts of new projects on the streetscape. With respect to housing, the Plan also includes policies that highlight the need for:

- A variety of housing types to ensure choice for current and future residents, workers, military families, and to strengthen commercial areas.
- Housing affordable to current residents through preservation where possible, as well as redevelopment activities.
- Development of market rate and affordable housing options for households with incomes at 60-120% of the area median income to preserve affordability in the LSDS and avoid displacement of existing residents.
- Homeownership options that allow local residents to invest in the community to gain equity and wealth.
- A mix of large and small builders that can provide new housing options at a variety of scales and levels of affordability.

These stated intentions of the Plan highlight the desire to encourage the development of housing that meets the needs of a broad range of households. This includes specific statements about avoiding displacement in the neighborhood, as well as encouraging local homeownership.

With respect to this Plan, there are some considerations with respect to long-term housing equity:

¹⁸ See [LMC 3.64.030](#) and [Ordinance No. 607](#) for the definition of the areas.

- **Stronger efforts may be needed with respect to anti-displacement policies.** Although an anti-displacement focus on development is included in the policies, there may need to be an increased focus on leveraging policies to encourage replacement of lost affordable units in the community. Similarly, while the Plan indicates several overall strategies such as housing navigator programs to address issues of displacement, further support and guidance could be put into place as part of a comprehensive anti-displacement policy.
- **Strategies should look to provide broader housing targets given access to transit.** The housing policies of the Subarea Plan look to encourage housing at 60–120% of median income to encourage an economically integrated neighborhood and prevent displacement of existing residents. However, as the City will also have state-mandated housing targets for households making 0–50% median income. Given the transit-supported nature of this neighborhood, identifying opportunities to include housing targets for a broader set of household incomes will be important. Similarly, housing targets should make note of the need for family-sized units as well, to ensure that broader types of households can be accommodated in the neighborhood.

Recommendations for Action

Across Lakewood’s different Citywide and subarea plans, there are several elements that address elements of housing equity and the history of exclusion in the housing market, but these can be updated and expanded upon. Considering low-income housing options, homeownership, improvements in amenities and community capital for neighborhoods with a greater proportion of residents of color as well as new multifamily development has the potential to address disparities in the community.

To better address local needs for equity in housing, the Lakewood 2024 Comprehensive Plan periodic review process should consider the following:

- **Incorporate state-mandated housing targets by income.** As noted in the previous section, the state has mandated housing targets for counties that will be taken up by constituent cities as part of planning. For Lakewood, these targets will include very low- and extremely low-income households, as well as requirements for permanent supportive housing and emergency housing. These targets will need to be incorporated into the Plan, and the City should also provide direction as to how these targets may apply to individual subarea plans and other neighborhoods.
- **Include policies that focus on integration of neighborhoods by income.** The housing policies in the Comprehensive Plan include some elements that intentionally discuss higher-income neighborhoods separate from the needs of moderate- and lower-income households. Where possible, future policies discussing how to accommodate new growth across different income levels should work to encourage mixed-income neighborhoods and developments. This can help promote access to amenities by lower-income households, and encourage better outcomes for households.
- **Provide stronger anti-displacement policies.** Although efforts to encourage new housing in the community should be a broad-based effort, there is the risk that new projects will take up existing “naturally occurring” affordable housing units and replace them with units that are inaccessible because of higher rents or inappropriate size (e.g., family-sized units being replaced by one-bedroom units). The City should provide stronger policies towards preservation of existing affordable units and accommodation of new affordable units in market-rate projects through direct policy goals, adjustments to incentive programs, and grant and loan programs for encouraging preservation.
- **Celebrate local diversity.** A specific consideration should be recognizing local communities of color as valued community resources that should be preserved and strengthened. The International District is one area with a strong base of businesses that should be a focus of clear policies, and the impact of these businesses on maintaining different communities of color in Lakewood should be reinforced. Additionally, discussions of cultural diversity should clearly define many of the local communities that contribute to that diversity, and highlight local needs to support those communities.
- **Improve support for low-income homeownership.** While homeownership is identified as an important goal in current policy, these elements do not typically extend to discussions of how low-income households can be included as homeowners as well. Policies regarding creative solutions to encouraging low-income homeownership, such as community land trusts (CLTs) and comparable programs should be highlighted. This should also include specific links to partnerships with local housing organizations such as Habitat for Humanity.

- **Enhance emergency housing support.** As the City works to integrate new income-based housing targets and identified emergency housing needs into the Comprehensive Plan, another potential focus may be on providing proactive approaches to stabilize households facing housing insecurity. This would supplement existing programs for home repair and down payment assistance, and provide emergency rent subsidies to prevent households from becoming homeless.
- **Provide for housing navigation services.** The Lakewood Station District Subarea Plan includes suggestions for housing navigation services, which would look to pair community members displaced by new development with appropriate housing opportunities. Expanding this type of approach further in partnership with local housing organizations to include the entire City may be an approach to increase local housing stability and minimize broader displacement across the community.

While these recommendations should consider the resources available to the City, providing stronger policy direction overall can also help to provide guidance for existing programs, and can help to set priorities for long-term action.