



COUNTY COMMISSIONERS

Carolina Mejia-Barahona  
District One

Gary Edwards  
District Two

Tye Menser  
District Three

**COMMUNITY PLANNING &  
ECONOMIC DEVELOPMENT DEPARTMENT**

Joshua Cummings, Director

*Creating Solutions for Our Future*

## MEMORANDUM

**TO:** Thurston County Planning Commission  
**FROM:** Maya Teeple, Senior Planner  
**DATE:** August 4, 2021  
**SUBJECT:** 2020-2021 Development Code Docket Item CR-5:  
Places of Worship Code Amendment (Title 23)

### Background

The 2020-2021 Official Development Code Docket includes a citizen proposal that requests to amend the Olympia Urban Growth Area Zoning Ordinance (Title 23) to change how associated uses to a place of worship are reviewed and permitted ([TCC 23.04.060\(21\)](#)). The requested amendment applies only to the Olympia Urban Growth Area of Thurston County.

The applicant states that the current language limits their client's ability to use their property to its full potential and suggests the proposal will provide greater opportunity for the community. The applicant's client is interested in housing students interested in faith onsite while training them. Development Services previously indicated (based on a specific project application at the time) that this type of use and development desired by the applicant would be considered a dormitory, and under the current code regulations is not permitted in the zones that exist on their property. Under TCC 23.02.080 – "Interpretations", a "Dormitory" is defined as a residential structure intended principally for sleeping accommodations, where no individual kitchen facilities are provided, and which is related to an educational or public institution or is maintained and operated by a nonprofit welfare organization.

The application (Attachment C) was received in January of 2019 and was first officially docketed by the Board in April 2020.

### Current Code Language

The current code language under Chapter 23.04 TCC – "Residential Districts" allows for places of worship to be permitted by special use permit within all residential districts:

- Residential One Unit per 5 Acres (R 1/5)

- Residential Low Impact Two to Four Units per Acre (RLI 2-4)
- Residential Four Units per Acre (R-4)
- Residential Four to Eight Units per Acre (R 4-8)
- Residential Six to Twelve Units per Acre (R 6-12)
- Mixed Residential Seven to Thirteen Units per Acre (MR 7-13)
- Mixed Residential Ten to Eighteen Units per Acre (MR 10-18)
- Residential Multifamily Eighteen Units per Acre (RM-18)

Dwelling units, such as dormitories, may be permitted in conjunction with a place of worship but must comply with the provisions governing residential uses in the district where it is located. For example, if an applicant wanted to build a dormitory in conjunction with a place of worship, it would be permitted in R 1/5, RLI 2-4, MR 10-18, and RM-18 but not in R-4, R 4-8, R 6-12, or MR 7-13, consistent with Table 4.01 in 23.04.040 TCC.

Likewise, associated uses to a place of worship are considered separate uses and are subject to the provisions of the district in which they are located. Types of associated uses for places of worship are listed under 23.04.060(21)(g) TCC and currently include day-schools, auditoriums, health centers, convents, preschool facilities, convalescent homes, and other uses of similar nature. For example, a convalescent home would be allowed in all residential zones by special use permit, except for R-4, consistent with Table 4.01 in 23.04.040 TCC.

Places of worship are also permitted by Special Use Permit in other zoning districts within the Olympia Urban Growth Area under Chapter 23.05 TCC – “Villages and Centers” and Chapter 23.06 – “Commercial Districts”:

- Neighborhood Center (Table 5.01, [TCC 23.05.040](#))
- Neighborhood Village (Table 5.01, [TCC 23.05.040](#))
- Urban Village (Table 5.01, [TCC 23.05.040](#))
- Community Oriented Shopping Center (Table 5.01, [TCC 23.05.040](#))
- Neighborhood Retail (Table 6.01, [TCC 23.06.040](#))
- Professional Office/Residential Multi-family (Table 6.01, [TCC 23.06.040](#))
- General Commercial (Table 6.01, [TCC 23.06.040](#))
- Medical Services (Table 6.01, [TCC 23.06.040](#))
- Arterial Commercial (Permitted Use rather than Special Use) (Table 6.01, [TCC 23.06.040](#))

For zones outside of residential districts that permit places of worship like villages and centers and commercial districts, the regulations under the Residential District Chapter of the code (section TCC 23.04.060(21)) still apply in addition to any other regulations as listed specific to the respective chapter (for example, specific development standards exist in the villages and centers and commercial districts chapters that still apply).

#### **Requested Change**

The applicant requests that the code language under TCC 23.04.060(21) be revised to:

- 1) Change dwelling units to be reviewed as associated uses (with changes below) and not subject to the underlying zone
- 2) Make associated uses under Item G to be considered as determined by the Approval Authority/Director, rather than subject to the regulations of the underlying zone
- 3) Add a definition of “boarding school” to Title 23

In reviewing the requested amendment with Development Services, staff identified several potential issues with the proposed code language as written in the application. The suggested language in the application does not specify a permitting pathway for uses “as determined by the Approval Authority/Director”, making it difficult to implement, not transparent for citizens, unclear for permitting staff, and potentially inconsistent. Additionally, the suggested definition for boarding school mixes two existing definitions (dormitories and schools). Boarding schools are also not a listed use anywhere else in Title 23, and consequently do not have a specified permit process for each zoning district or any established development standards. Likewise, the Olympia Municipal Code (OMC) does not define boarding schools or have a specific permitting process for them.

Based on this review and comment from the City of Olympia, staff developed alternative language as included in Attachment A. The draft amendments still meet the applicant’s goal to be able to house students on-site while training, while also providing guidelines for the permitting process that make the code consistently implementable and transparent to citizens and staff.

The scope of these changes would apply to dormitories permitted in conjunction with a place of worship specifically in residential districts. As the proposal is currently drafted in Attachment A, dormitories could be permitted through a special use permit in two additional zones only when in conjunction with a place of worship: R-4 and R 4-8. The other zones that outright permit dormitories (R 1/5, RLI 2-4, MR 10-18 and RM 18) remain unchanged and would still permit for dormitories. Additionally, there are no changes proposed to where places of worship are permitted.

## **Consistency with Other Plans & Regulations**

### ***Consistency with City of Olympia Regulations***

If adopted, the proposed amendment would make the regulations for dormitories within the Olympia Urban Growth Area Zoning Ordinance inconsistent with the current code language of the City of Olympia (Table 4.01 [OMC 18.04.040](#)), which currently only allows for dormitories as a permitted use in R 1/5, RLI, MR 10-18, RM 18, Residential Multi-family 24 (RM 24), Residential Multifamily High Rise (RMH), Residential Mixed Use (RMU), and Urban Residential (UR). Table 4.01 of OMC 18.04.040 does not allow dormitories in the following zones: R-4, R-4CB, R 4-8, R 6-12, MR 7-13, or Manufactured Housing Park (MHP). Boarding schools are also not defined within the OMC.

The Olympia Municipal Code defines a dormitory as a residential structure intended principally for sleeping accommodations, where no individual kitchen facilities are provided, and which is related to an educational or public institution or is maintained and operated by a non-profit welfare organization. Based on this definition, the City has indicated it is unclear if the City would allow a dormitory in association with a place of worship without code amendments.

### ***City of Olympia Comments on Proposal***

Prior to bringing this item forward to Planning Commission, Thurston County sent a draft of the revised proposal and application to the City of Olympia for comment. Below is a summary of the main points from the City of Olympia's comments, and the full letter can be seen in Attachment B:

- The proposed amendments go further than the OMC allows for. If the intention is to align the City and County codes for the urban growth area, it may be necessary to make changes to the proposal, either by the county or city, or both.
- Under the proposal, dormitories would be allowed in more zones than the City's code currently allows for. The proposed draft would allow them as a permitted use, but would a conditional use permit be needed?
- Is there a reason that dormitories are permitted with a place of worship but not a school?
- Is boarding school defined? The City of Olympia does not have a definition for boarding school.
- There is no cap on size for dormitories and boarding schools, so there could be a large-scale situation. Is the code prepared to address potential scale/size impacts?
- An alternative route for the County to consider could be to add under associated uses a different type of use that is already listed as allowed - for example, guest houses or single-room occupancies.

Initially, the draft sent to the City of Olympia included "boarding schools" under associated uses for places of worship and added dormitories as a permitted use rather than special use in the two added zones. Based on the City's comments, the draft code language was revised to the version provided to the Planning Commission in Attachment A, with the following changes made:

- Dormitories as a special use for the two added zones when permitted in conjunction with a place of worship, rather than a permitted use.
- Remove boarding schools from the associated uses clause under Place of Worship, as there is no definition, no development regulations established, and it is not identified in the use tables throughout Title 23. Furthermore, the City does not have a definition for boarding schools.
- Staff reviewed guest houses and single-room occupancy as options to add under associated uses. While these could be added under associated uses in lieu of dormitories to provide for a smaller-scale option, they may not meet the applicant's full need, and could require the applicant to re-work their future project plans.
- As stated in the City of Olympia's comment, there is currently no cap on dormitories and the proposed change could result in large-scale dormitories in conjunction with a place of

worship in R-4 and R 4-8. Additional language could be added under the regulatory standards for Places of Worship (TCC 23.04.060(21)) to cap size of dormitories that are permitted in conjunction with them.

### ***Internal Consistency with Other Thurston County Code Regulations***

Churches are permitted in a variety of zones under the Thurston County Zoning Ordinance (Title 20). In some zoning districts, churches require a special use permit (for example, Rural 1/20 or Rural 1/10) whereas in other zoning districts they are considered a permitted use (for example, Highway Commercial). Similarly to the current language under Title 23, the Thurston County Zoning Ordinance (Title 20) states that dwellings located in conjunction with a church must comply with the provisions governing residential uses of the use district in which it is located ([TCC 20.54.070\(7\)](#)).

In the Lacey Urban Growth Area Zoning Ordinance (Title 21), churches sometimes require a special use permit whereas in other zoning districts they are considered a permitted use (for example, Village Centers). The code doesn't specify a separate process for permitting of church-sponsored and associated uses.

In the Tumwater Urban Growth Area Zoning Ordinance (Title 22), churches are permitted as a special use in the Mixed Use (MU), Residential/Sensitive Resource Zone (RSR), Single-Family Low Density (SFL), Single-Family Medium Density (SFM), Multi-family Medium Density (MFM), and Multi-family High Density (MFH) zoning districts. Church-sponsored uses located apart from the main building, such as residences, schools, auditoriums, convents, and other uses, are considered separate uses are subject to applicable provisions ([TCC 22.56.100](#)).

In no other Title of the code are associated uses to places of worship considered and permitted as determined by the Approval Authority/Director; they are typically considered separate uses, subject to applicable provisions. The proposed change would maintain consistency with how associated uses to places of worship are permitted in other titles of the code by considering them as separate uses.

### ***Consistency with Comprehensive Plan Policies***

The proposed change maintains consistency with current county comprehensive plan and City of Olympia Joint Plan policies. Relevant policies in the Thurston County Comprehensive Plan include:

- (Chapter 8, Goal 1, Objective B, Policy 3, p. 8-29) – “The county should provide for certainty, consistency, and timely processing of land use permits.”
- (Chapter 8, Goal 1, Objective B, Policy 13, p. 8-30) – “The county should review all new development regulations to determine their impact on existing businesses.”
- (City of Olympia Joint Plan, PP 6.2) – “Work with Thurston County on its land-use designations for unincorporated county areas within the city’s Urban Growth Boundary

so they will be compatible with the City’s policies and development standards when they are annexed.”

Currently, code language for places of worship is consistent between the City of Olympia and the Urban Growth Area of Olympia. However, the proposed change would result in differences in regulatory language for the Urban Growth Area of Olympia and the City of Olympia. If the goal is to align these codes, changes may be needed to the proposal, either by the county or city, or both

#### **Attachments**

- Attachment A – Draft Amended Code Language
- Attachment B – Feedback from the City of Olympia
- Attachment C – Citizen Application for Development Code Amendment

**Thurston County Community Planning and Economic Development  
Department**

**Community Planning Division**

**THURSTON COUNTY PLANNING COMMISSION**

**PUBLIC DRAFT**

**Titles: 23**

August 4, 2021

**Places of Worship Code Amendment.**

**Chapter: 23.04 (attachment-A)**

Deleted Text:	<del>Strikethrough</del>	Proposed Changes:	<u>Underlined</u>
Staff Comments:	<i>Italics</i>	Unaffected Omitted Text	...

*The proposed amendments contained herein are related to 2020/2021 Official Development Code Docket Item CR-5. This docket item is a citizen-initiated amendment that requests that associated uses sponsored by a place of worship be considered as determined by the City/County, and that dwelling units be considered as an associated use. Specifically, the applicant wishes to amend the code to allow for places of worship to house and train students on the property. Currently, associated uses and dwelling units are permitted in conjunction with places of worship provided they are allowed in the governing zoning district and meet all the underlying regulations of that zoning district.*

## **ATTACHMENT – A: Olympia Urban Growth Area Zoning Ordinance (Title 23)**

### **Chapter 23.04 – RESIDENTIAL DISTRICTS’ USE STANDARDS.**

23.04.040 – Permitted, special and prohibited uses.

...

**Table 4.01**  
**Permitted and Special Uses**

District	RI/5	RLI 2-4	R- 4	R 4- 8	R 6- 12	MR 7-13	MR 10-18	RM 18	Applicable Regulations
<b>District- Wide Regulations</b>						23.04.060(17)	23.04.060(17)	23.04.060(14)	
<b>1. Single- Family Housing</b>									
...									
Dormitories	P	P	<u>S</u> *	<u>S</u> *			P	P	
...									

Legend:

P = Permitted use

R 6-12 = Residential 6-12

R 4-8 = Residential 4-8

RM 18 = Residential multifamily 18

MR 10-18 = Mixed residential  
10-18

R-4 = Residential 4

S = Special use

MR 7-13 = Mixed residential 7-13

Note S\*: Permitted through a special use permit and only when in conjunction with a Place of Worship under 23.04.060(21).

...

23.04.060 - Residential districts' use standards.

...

21. Places of Worship. The following requirements apply to all places of worship subject to special use approval:
- a. Location. Before a place of worship may be located in an R-4, R 4—8, R 6—12, MR 7—13 or MR 10—18 district, at least one of the following locational criteria shall be met:
    - i. The proposed place of worship shall be located within three hundred feet of an arterial street, major collector street, or an access point on a highway; or
    - ii. The site is within three hundred feet of a school and/or park.
  - b. Plan Review. Plans showing the site layout and design of proposed buildings shall be submitted for approval as part of site plan review by the department, in accordance with Chapter 23.72.
  - c. Size. The minimum lot size shall be twenty thousand square feet.
  - d. Dwelling Units. Any dwelling in conjunction with a place of worship shall comply with the provisions governing residential uses in the district where it is located.
  - e. Conversion. No existing building or structure shall be converted to a place of worship unless such building or structure complies or is brought into compliance with the provisions of this code and any other applicable county regulations.
  - f. Screening. There shall be sight-obscuring screening along the perimeter of parking lots adjunct to a place of worship which are located across the street from or abutting a residential use. (See Chapter 23.36, Landscaping and Screening.)
  - g. Associated Uses. Uses sponsored by a place of worship such as day-schools, auditoriums used for social and sports activities, health centers, convents, preschool facilities, convalescent homes, dormitories and others of similar nature shall be considered separate uses subject to the provisions of the district in which they are located. (See Section 23.04.060(4) which provides for child care centers as accessory uses.)

**From:** [Joyce Phillips](#)  
**To:** [Maya Teeple](#)  
**Cc:** [Nicole Floyd](#)  
**Subject:** FW: Seeking City Comments: Proposed Code Change to Oly UGA 23.04 TCC - Places of Worship  
**Date:** Friday, July 16, 2021 9:10:36 AM

---

Hi, Maya.

Again, thank you for the opportunity to review and comment. Nicole Floyd, Principal Planner, on behalf of the Olympia Community Planning & Development Department, offered the following comments:

The proposed amendments go further than the Olympia code allows. If the intention is to align the City and County codes for the urban growth area, it may be necessary to make changes to the proposal, either by the county or city, or both. Comments on the proposed language include:

1. Dormitories:
  - a. This proposal would allow them in more zones than the City's code currently allows.
  - b. They are listed as a Permitted Use. The proposal puts a "P" in the box rather than a "C" to identify it as a Conditional Use. There is a caveat that they are only permitted when associated with a place of worship, but does that mean that an existing place of worship can add dorms in all situations or would a conditional use permit (or amendment to an existing one) be needed?
  - c. Is there a reason they would be permitted with a place of worship but not a school? In the past, colleges have wanted dorms and have been told no due to current code limitations. It seems odd that dormitories would be allowed in the county but not the city, and associated to a church/place of worship but not a school or higher education campus.
  - d. The OMC definition of dormitory requires an affiliation with an educational or public institution. It is unclear that the city would allow a dormitory in association with a place of worship without code amendments.
2. Boarding school: Is boarding school defined? It is not defined in the OMC. School is...but not boarding school. Things to consider:
  - a. Since the list of "other" similar uses associated to the church/place of worship is not exhaustive, you may want to consider listing something smaller scale in nature, maybe guest houses? Ideally, something that is defined by code already that might capture the applicants intent but not extend into full scale dormitories. There is some concern about unintended consequences of allowing dorms or boarding schools. In the context of this application, it seems like they are looking for a conversion of an existing residence to allow for a small-scale single room occupancy type arrangement. What is unclear is how someone else might interpret this in other, perhaps larger-scale, situations. There does not seem to be any meaningful limitations on how large of a dormitory or boarding school might be requested. Would this include large-scale dorms at major colleges? Is this code section prepared to address potential impacts related to scale/size etc.?

3. Criteria D (dwelling units) and g (associated uses) are very similar when considering the types of associated housing that can be paired with a place of worship. Using already listed allowed uses could be a simple approach. Did the county consider focusing on guesthouses, Single Room Occupancies, or something similar? Boarding home sounds good but is for elderly residents in Olympia's code. The following definitions in OMC are worth considering:

- i. Guest House: living quarters without kitchen facilities located on the same lot with a principal building and occupied for the sole use of members of the family, temporary guests, or persons permanently employed on the premises.
- ii. Single Room Occupancy: A housing type consisting of one room with cooking facilities and with shared bathroom facilities.

Thank you for the opportunity to review and comment. Please feel free to contact me or Nicole if you would like to discuss the above comments in more detail. My contact information is included below or you may reach Nicole at [nfloyd@ci.olympia.wa.us](mailto:nfloyd@ci.olympia.wa.us) or 360-570-3768.

Joyce

Joyce Phillips, AICP, Principal Planner  
City of Olympia | Community Planning and Development  
601 4th Avenue East | PO Box 1967, Olympia WA 98507-1967  
360.570.3722 | [olympiawa.gov](http://olympiawa.gov)

**Note: Emails are public records, and are potentially eligible for release.**

---

**From:** Joyce Phillips <[jphillip@ci.olympia.wa.us](mailto:jphillip@ci.olympia.wa.us)>  
**Sent:** Friday, July 09, 2021 4:36 PM  
**To:** Nicole Floyd <[nfloyd@ci.olympia.wa.us](mailto:nfloyd@ci.olympia.wa.us)>  
**Subject:** FW: Seeking City Comments: Proposed Code Change to Oly UGA 23.04 TCC - Places of Worship

Hi, Nicole.  
Please let me know if you have any comments. If at all possible Maya would like comments by July 16<sup>th</sup>. Thanks!  
Joyce

---

**From:** Maya Teeple <[maya.teeple@co.thurston.wa.us](mailto:maya.teeple@co.thurston.wa.us)>  
**Sent:** Friday, July 09, 2021 4:09 PM  
**To:** Joyce Phillips <[jphillip@ci.olympia.wa.us](mailto:jphillip@ci.olympia.wa.us)>  
**Subject:** Seeking City Comments: Proposed Code Change to Oly UGA 23.04 TCC - Places of Worship

**External Email Alert!**

This email originated from a source outside of the City's network. Use caution before clicking on links or opening attachments.

Hi Joyce,

Happy Friday! Hope this email finds you well.

I am working on a small code change to the Olympia Urban Growth Area code (Title 23 TCC). The applicant submitted an application back in early 2019 and initially noted that they had worked with Nicole Floyd in the City of Olympia to come up with their proposed code language.

In working with our permitting staff, it's changed quite a bit from the applicant's original request (simpler language and clarified from the original request). The amendment would make the code language different than what the City of Olympia allows for currently. I wanted to provide the City with the opportunity to review and comment on it before I take it forward to our Planning Commission process. Is there someone over there I who could review and comment? The draft and original application are attached.

It's very short, so I am hoping to get comments from the City by the end of next week (July 16). Of course there will still be additional opportunities for the City to comment during Planning Commission (Aug-Sept) and Board of County Commissioner (late 2021) review as well.

Thank you,

**Maya Teeple** | Senior Planner  
Thurston County Community Planning & Economic Development  
Community Planning Division  
2000 Lakeridge Dr SW, Bldg 1, Olympia, Washington 98502  
Cell (Primary): (360) 545-2593  
[Maya.Teeple@co.thurston.wa.us](mailto:Maya.Teeple@co.thurston.wa.us) | [www.thurstonplanning.org](http://www.thurstonplanning.org)

## PROPOSED CODE AMENDMENT

Note: the Board of County Commissioners will rely largely on the information provided in this form to decide whether or not to pursue the proposed code amendment.

**What is the issue/problem/opportunity to be addressed? What problems are County residents or other parties having with the current regulations?** (Provide a specific example, if possible.):

We are wanting to address an opportunity in the existing code section under Chapter 23.04.060, item 21, Places of Worship, which is limiting the ability of our client to use their property to its full potential. Our client, Peace Lutheran Church, is looking for the ability to house and train students interested in the faith as an associated use to the church. Currently the code section has some restrictive language limiting the ability of the church to fulfill this mission and we would like to offer some changes for consideration, which could provide greater opportunity for the community.

**Are you aware of anyone else (individual or group) who shares this concern? If yes, who? How many?** (Please provide contact information, if possible.)

We are not currently aware of any individual or groups currently sharing our same concern.

**What do you think needs to be changed, added, or deleted in the code?** (Please cite the section of code you want changed or attach the affected code with the proposed changes.)

We would like to offer the following changes for consideration:

1. Under Chapter 23.04.060, Section 21, item G, Associated Uses,
  - a. currently reads: "*Uses sponsored by a place of worship such as day-schools, auditoriums used for social and sports activities, health centers, convents, preschool facilities, convalescent homes and others of similar nature shall be considered separate uses subject to the provisions of the district in which they are located.*"
  - b. Suggested alternative: "*Uses sponsored by a place of worship such as day-schools, auditoriums used for social and sports activities, health centers, convents, preschool facilities, convalescent homes and others of similar nature may be considered as determined by the City.*"
2. Under Chapter 23.04.060, Section 21, item D, Dwelling Units, we are recommending this item be removed as it can be addressed with item G, Associated Uses.
3. Suggest adding a definition for "Boarding School" as follows:
  - a. Boarding School – provides for education of students who live on the premises in dormitory style housing. Housing for students at a boarding school shall not exceed 1 bed per 5,000 square feet of land area.

**Where would the amendment apply?**

- ☐ County-wide      ☐ Rural County
- ☒ Growth Area. Please check the applicable growth area:
- |                                             |                                      |                                  |
|---------------------------------------------|--------------------------------------|----------------------------------|
| <input checked="" type="checkbox"/> Olympia | <input type="checkbox"/> Yelm        | <input type="checkbox"/> Rainier |
| <input type="checkbox"/> Lacey              | <input type="checkbox"/> Grand Mound |                                  |
| <input type="checkbox"/> Tumwater           | <input type="checkbox"/> Tenino      |                                  |

**Site address, if applicable:**

Project Address where requested code amendments will create opportunity for improved services: 2242 Friendly Grove, Olympia, WA

**Who initiated the request:** Thomas Architecture Studios on behalf of Peace Lutheran Church

**Citizen contact/email/telephone number:** 360-915-8775

**Staff contact/email/telephone number:** Tom Rieger , AIA (Thomas Architecture Studios)

**Other departments notified:** \_\_\_\_\_

PLEASE RETURN THIS FORM TO:

JEREMY DAVIS, [davisj@co.thurston.wa.us](mailto:davisj@co.thurston.wa.us) 754-3355 ext. 7010