

4.14 POPULATION AND HOUSING

This section evaluates the potential effects of implementing the 2040 General Plan on population and housing, including the potential to reduce affordable housing, displace substantial numbers of people or housing, induce substantial unplanned population growth, or result in low-income employment opportunities that could generate demand for low-income housing. As described in the “Approach to the Environmental Analysis” section, the following assessment of impacts is based on the characterization of existing environmental conditions and the regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments received on the notice of preparation included concerns regarding affordable housing, adequate workforce housing, and consistency with the County’s Regional Housing Needs Assessment (RHNA). These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.14.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Chapter 2, “Demographics and Economics,” and Chapter 5, “Housing,” the Background Report (Appendix B), the following information is relevant to understanding and evaluating the potential population, employment, and housing impacts of the 2040 General Plan.

Government Code Section 65863

Government Code Section 65863 requires that cities and counties ensure their housing elements make available sites for the remaining unmet share of regional housing needs. In addition, cities and counties are required to have no “net loss” of identified RHNA sites for lower and moderate-income dwelling units. Therefore, cities and counties may not take action that would reduce identified affordable housing sites for these income categories.

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation in Chapter 2, “Demographics and Economics,” and Chapter 5, “Housing.” There is no additional information necessary to understand the potential population, employment, and housing impacts of the 2040 General Plan.

4.14.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

The evaluation of potential impacts related to population and housing is based on information obtained from review of Chapter 2, “Demographics and Economics,” and Chapter 5, “Housing,” in the Background Report and available population, employment, and housing data and projections from the California Department of Finance. This evaluation includes review of the existing number of dwelling units, projected demand for housing units based on regional growth estimates, and whether any housing units, including affordable housing units would be eliminated or displaced under the 2040 General Plan. Affordable housing units are defined as moderate-income in the Coastal Zone and lower-income for the remainder of the plan area. (Lower-income is the term used to collectively refer to low-, very-low, and extremely-low income households.) Existing and future land uses were also evaluated to determine whether substantial unplanned population growth or displacement of a substantial number of people would occur. For purposes of analysis, substantial population growth is defined as growth exceeding the Southern California Association of Governments (SCAG) population projections for the county. Substantial displacement would occur if allowed land uses would displace more residences than would be accommodated through growth accommodated by the 2040 General Plan. In determining the level of significance, this analysis assumes that the 2040 General Plan would comply with the Guidelines for Orderly Development, greenbelt agreements, and the Save Open Space & Agricultural Resources (SOAR) measures for Ventura County’s unincorporated areas and eight cities.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County of Ventura’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts. Appendix G of the State CEQA Guidelines (“Appendix G”) also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the Draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to consider the programmatic nature of a plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, ISAG Section 26, threshold 1, which evaluates the potential for elimination of affordable housing units has been combined with Appendix G question XIV(b) regarding displacement of substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere. ISAG Section 26, threshold 2, has been revised to delete references to project-specific and cumulative impacts related to providing adequate low-income housing for low-income employment opportunities. In addition, Appendix G question XIV(a), which evaluates whether a project would induce substantial unplanned population growth, is not addressed by ISAG thresholds. Therefore, this question has been added as a separate threshold below.

For the purpose of this Draft EIR, implementation of the 2040 General plan would have a significant population and housing impact if it would:

- ▶ Eliminate three or more affordable housing units (defined as moderate-income in the Coastal Zone, lower-income for the remainder of the plan area), or otherwise displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere.
- ▶ Induce substantial unplanned population growth either directly or indirectly.
- ▶ Result in low-income employment opportunities that could generate demand for new housing that exceeds the County's inventory of land to develop low-income housing.

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to population and housing. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to population and housing. The Area Plan policies and implementation programs related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following impact discussions. Therefore, the environmental effects of the Area Plan policies and implementation programs are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to population and housing and, specifically, the thresholds of significance identified above, include the following:

Land Use and Community Character Element

- ▶ **Policy LU-1.1: Guidelines for Orderly Development.** The County shall continue to promote orderly and compact development by:
 - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
 - require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2. (RDR, IGC) [*Source: Existing GPP Goal 3.1.1.2 and Goal 3.1.1.5, modified*]
- ▶ **Policy LU-1.3: Regional Housing Needs Allocations.** The County shall coordinate with Southern California Association of Governments (SCAG) to direct state regional housing needs allocations predominantly to cities to ensure consistency with the County's Save Open Space & Agricultural Resources (SOAR) initiative and the SCAG's Sustainable Communities Strategy. (RDR, IGC) [*Source: New Policy*]

- ▶ **Policy LU-1.6: Accommodating Future Growth.** The County shall ensure that the General Plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas as determined by the Board of Supervisors. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-3.1: Existing Community(ies).** The Existing Community area designation, referred to in SOAR, identifies existing urban residential, commercial, or industrial enclaves outside of incorporated areas and unincorporated urban centers. The Existing Community area designation recognizes existing land uses in unincorporated areas which have been developed with urban building intensities and urban land uses, contains these enclaves within specific areas so as to prevent further expansion, and limits the building intensity and land use to previously established levels. Thomas Aquinas College is newly designated in this initiative as Existing Community, with the intention that it be confined to its current boundaries with the understanding that it may continue to intensify its building for its educationally related purposes. Figure 2-1 indicates the boundary of the Existing Community area designation. All areas inside these boundaries are considered within the Existing Community area designation for purposes of this General Plan and implementation of the Guidelines for Orderly Development and Save Open Space & Agricultural Resources (SOAR) initiative. This term is considered synonymous with “Urban Enclave” as used in other planning documents. (RDR, MPSP) *[Source: Existing GPP Policy 3.2 Land Use Designations, modified. SOAR]*
- ▶ **Policy LU-4.5: Jobs-Housing Balance.** The County shall evaluate employment generating discretionary development resulting in 30 or more new full-time and full-time-equivalent employees to assess the project’s impact on lower-income housing demand within the community in which the project is located or within a 15-minute commute distance of the project. At such time as the Housing Impact Mitigation Fee Program is completed, this policy shall no longer apply. (RDR) *[Source: Existing GPP Goal 3.4.2.9, modified]*
- ▶ **Policy LU-8.5: Farmworker Housing.** The County shall support the development of safe and quality farmworker housing that facilitates a reliable labor force and promotes efficient agricultural operations. Housing units shall include a variety of housing types, including group quarters and larger dwelling units that can accommodate a family. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-10.1: Accessory Dwelling Units.** The County shall permit accessory dwelling units as provided for in the Non-Coastal and Coastal Zoning Ordinances, even if such a dwelling would result in a density greater than the standard density specified for the residential land use designations. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-10.2: Density Exceptions – Residential Land Use Designation.** The County shall exclude from the Residential land use maximum density farmworker dwellings, and accessory dwelling units pursuant to section 65852.2 of the Government Code. (RDR) *[Source: Existing GPP Figure 3.4 General Residential Building Intensity Standards/Population Density Range Table, Footnote No. 2, Modified]*

- ▶ **Policy LU-10.3: Maximum Lot Coverage Nonconforming Lots - Residential Land Use Designations.** The County shall ensure that the maximum lot coverage for lots of less than one acre (nonconforming) in area shall be as specified for the Residential designation, or 2,500 square feet plus 1 square foot for each 4,596 square feet of lot area over 5,000 square feet, whichever is greater. *[Source: Existing GPP Figures 3.7a through 3.28b, Existing Community Building Intensity/Population Density Tables, Footnote No. 1, Modified]*
- ▶ **Policy LU-10.4: Range of Housing Choices.** The County shall facilitate the creation of a variety of housing types that meet the needs of all residents. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-15.9: Area Plan Impacts on Jobs/Housing Balance.** The County shall require that as Area Plans are prepared or updated, planned industrial and commercial areas shall be evaluated to assess the impact on jobs/housing balance within the community and region. (RDR) *[Source: Existing GPP Policy 3.4.2.8]*

Implementation Programs

- ▶ **Implementation Program B: General Plan Consistency.** The County shall review and amend, as necessary, applicable ordinances and regulations to ensure consistency with the General Plan, including the Zoning Ordinances and Building Code. *[Source: New Program]*
- ▶ **Implementation Program C: Expansion of Allowed Housing Types.** The County shall research existing regulatory impediments to the creation of new housing types that have the potential to fulfill unmet housing needs (e.g., tiny homes, co-housing developments) and if necessary, shall amend applicable ordinances to allow for their development. *[Source: New Program]*

Economic Vitality Element

- ▶ **Policy EV-1.3: Housing Affordability.** The County shall continue to work with cities and community organizations to implement best practices, pursue funding, and implement programs that reduce the cost of housing to retain and attract employers and employees. (MPSP, IGC) *[Source: VCEVSP Policy F.1, modified]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.14-1: Eliminate Three or More Existing Affordable Housing Units or Displace Substantial Numbers of People or Housing Units

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

As discussed in Table 3-3 in Chapter 3, “Project Description,” the unincorporated county is projected to reach 101,832 residents, and 33,472 housing units by 2040; the 2040 General Plan would primarily direct this growth to areas in the Existing Community area designation. While housing or people could be displaced if redevelopment of an existing residential area occurred within the plan area, in the unlikely event that housing units were removed, it would not likely be a substantial number of units and it would be replaced with housing consistent with the residential land use designation of that area. The additional 1,281 housing units that would be accommodated under the 2040 General Plan would more than offset any minimal displacement of any existing housing units that could possibly be displaced in existing communities. In addition, in accordance with Government Code Section 65863, no affordable housing units would be displaced or removed.

State law requires that every jurisdiction prepares a housing element as part of its general plan. The California Department of Housing and Community Development determines the number of new housing units a region is projected to need at all income levels (very low-, low-, moderate, and above-moderate income) over the course of the housing element planning period to accommodate population growth and overcome existing deficiencies in the housing supply. This number is called RHNA. SCAG, which is the local Council of Government, then assigns a share of the RHNA to every city and county in the region based on a variety of factors. In preparing the housing element, the County must show how it plans to accommodate its share of the RHNA. The housing element must include an inventory of the sites already zoned for housing. If a community does not have enough sites within its existing inventory of residentially zoned land to accommodate its entire RHNA, then the community must adopt a program to rezone land.

To meet the lower-income portion of the RHNA (i.e., low-income, very-low income, and extremely low), the County can assume that land zoned with a density of at least 20 dwelling units per acre qualifies as suitable for development of housing affordable to lower-income households (Government Code, Section 65583.2(c)(3)(B)).

Further, the County can address a portion of its RHNA through the provision of accessory dwelling units (ADUs). As of 2018, the County permits ADUs on most lots that allow for residential development, including Open Space and Agricultural Exclusive zoned lots. ADUs are a valuable housing type that can facilitate affordability for a variety of housing needs. The 2040 General Plan also includes Policy LU-10.1 that states the County shall permit accessory dwelling units as provided for in the Non-Coastal and Coastal Zoning Ordinance even if such a dwelling would result in a density greater than the standard density specified for the residential land use designations. Farmworker housing is another source of lower-income housing that contributes to the County's lower-income housing needs. Policy LU-8.5 states that the County shall support the development of safe and quality farmworker housing.

The RHNA numbers for the 2014-2021 County of Ventura Housing Element are shown below in Table 4.14-1. A total of 1,015 units were allocated to unincorporated county. The California Department of Housing and Community Development certified the current County Housing Element on December 2013, which means that the Housing Element provided sufficient evidence of adequate capacity to meet the current RHNA allocation for housing at all income levels.

Table 4.14-1 2014-2021 RHNA for the Unincorporated County

Income Category	RHNA Allocation (DUs)
Extremely Low (<30% median)	123
Very Low (>30%-<50% median)	123
Low (>50%-<80% median)	168
Moderate (>80%-<120% median)	189
Upper (>120% median)	412
Totals	1,015

Source: Background Report (Appendix B)

The next cycle of housing element updates for cities and counties within the SCAG area will cover the planning period from 2021 to 2029. Identifying sufficient sites for this next cycle will be a challenge since a package of state laws, which passed in 2017 and went into effect in 2018, has made it more difficult to meet lower income inventory site requirements. Due to these new laws, a majority of the inventory sites identified for lower income housing in the current housing element will not be eligible to be reused in the upcoming housing element. It is anticipated that the County will have to identify additional land that would meet state standards for lower-income inventory site requirements, thus adding more opportunities for affordable housing.

Furthermore, the 2040 General Plan includes policies and programs to ensure future development within the plan area is consistent with the RHNA and can be accommodated by the land allocated to residential development. Policy LU-1.3 states the County shall coordinate with SCAG to direct state regional housing needs allocations, and Policy LU-1.6 would ensure that the 2040 General Plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas. By coordinating with SCAG and ensuring adequate land for urban development, future development under the 2040 General Plan would be directed to designated areas and would not displace existing people or housing.

Policy LU-1.1 states the County shall continue to promote orderly and compact development, and Policy LU-3.1 further states that the Existing Community area designation, referred to in the SOAR initiative, identifies existing urban residential, commercial, or industrial enclaves outside of incorporated areas and unincorporated urban centers. The Existing Community area designation recognizes existing land uses in unincorporated areas that have been developed with urban building intensities and urban land uses, contains these enclaves within specific areas to prevent further expansion, and limits the building intensity and land use to previously established levels. Section 3.4.2 of the Piru Area Plan includes a policy that requires residential development within the Piru expansion area, but outside the Redevelopment area will ensure that 10.5 percent of the units will be maintained as affordable to low-income families. In addition, Section 3.3.2 of the Thousand Oaks Area Plan includes policies for providing bonuses to developers for qualified affordable housing developments, and requiring development permits involving 20 or more dwelling units to provide a variety of housing densities to meet the needs of diverse family income levels.

Therefore, implementation of the policies and programs in the 2040 General Plan and compliance with applicable regulations would ensure that future development could be accommodated within the plan area. The County has planned for future growth in areas near existing communities. While some housing could be displaced through development of areas near existing communities, these areas either would continue to be under residential land use designations or would add new residential areas (e.g., replace non-residential land uses) within the plan area such that a net gain in residential capacity would be achieved. Further, as has been past practice in the county, the County would continue to engage with SCAG through each RHNA planning cycle to ensure adequate land is available to meet its RHNA obligations. Overall, substantial numbers of people or housing, including affordable housing, would not be displaced through implementation of the 2040 General Plan. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.14-2: Induce Substantial Unplanned Population Growth

The existing population of unincorporated Ventura County (as of 2019) is 96,377. Growth projections employed in the preparation of the 2040 General Plan were estimated for 2020, 2030, and 2040 using county-specific demographic projections prepared by SCAG as described in Chapter 3, "Project Description." SCAG projections for Ventura County show a projected population of 101,832 residents by 2040. Although the 2040 General Plan is based upon the assumption that the unincorporated county will reach this projected population, it does not directly promote the growth of the county's population to that level. Moreover, and the rate of growth between 2019 and 2040, if a total population of 101,832 is to be reached, is a modest 0.4 percent per year.

This growth would be expected to occur without implementation of the 2040 General Plan. The philosophy of the 2040 General Plan is that the County would be prepared and able to accommodate projected growth, while adhering to policies that define where and how development would occur. The 2040 General Plan provides guidance in determining the appropriate or desirable locations for this growth, thereby preventing an unnecessarily scattered dispersed pattern of development, which often results in extraordinary demands on public services, above average public service costs, and unnecessary and avoidable destruction or degradation of valuable natural resources.

Section 2.1 of the Land Use and Community Character Element states that the County is dedicated to directing urban development to cities and existing unincorporated communities to preserve its working and rural landscapes, agricultural lands, scenic vistas, natural resources, and recreational opportunities. The 2040 General Plan would not make changes to the agricultural, open space, or rural land use designations located outside of Existing Community and Urban designated areas (consistent with the SOAR initiative). SOAR measures within cities establish voter-controlled urban growth boundaries, known as City Urban Restriction Boundaries. The County's SOAR measure, which is included as Appendix C and incorporated by reference into the 2040 General Plan, generally requires voter approval to re-designate land with Open Space, Agricultural, or Rural general plan land use designations, and to amend the goals and policies for these land use designations.

Policies and programs within the 2040 General Plan do not promote unplanned growth, but rather direct where and how projected growth within the unincorporated county is expected to occur. For example, Policy LU-1.1 states that the County shall promote orderly growth, and Policy LU-1.6 states that the County shall ensure that the General Plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas. Policy LU-1.3 ensures that the County will coordinate with SCAG to direct state regional housing needs allocations predominantly to cities to ensure consistency with the County's SOAR initiative and the SCAG's Sustainable Communities Strategy. All of these policies are focused on managing and planning for the location of projected future growth within the county and maximizing efficient development patterns.

For additional discussion of population and economic growth, and analysis of the potential for the 2040 General Plan to remove obstacles to growth, refer to Chapter 7, "Other CEQA Considerations." Furthermore, the physical environmental impacts associated with the growth that would be accommodated by the 2040 General Plan have been analyzed and disclosed throughout Chapter 4 of this Draft EIR. The 2040 General Plan would not induce substantial unplanned population growth beyond the projections prepared by SCAG. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.14-3: Result in Low-Income Employment Opportunities that could Generate Demand for New Housing that Exceeds the County's Inventory of Land to Develop Low-Income Housing

Employment opportunities within the unincorporated county are expected to increase in the future, including low-income employment opportunities. The Economic Vitality Element of the 2040 General Plan contains policies and programs that aim to retain and expand existing economic sectors, to help diversify the economy by developing new kinds of businesses, and to help improve economic resiliency. Ventura County's economy is diverse, offering specific strengths in agriculture, manufacturing, health care, retail trade, hospitality, and public administration. These industries are where Ventura County has large concentrations of employment. However, economic growth and the distribution of economic benefits have not kept pace with other areas in the Southern California region or state. County economic activity totaled more than \$70 billion in 2014, but this represented a decline in real dollar terms since 2007, during a period in which the state economy grew 10.1 percent.

While an increase in employment opportunities within the plan area is expected during the 2040 planning horizon, the county has adequate capacity to meet the current RHNA allocation for housing in all household income categories. In addition, policies and programs within the 2040 General Plan would ensure that housing needs, including future housing needs for the projected increase in low-income employment would be met. For example, Policy EV-1.3 states the County shall continue to work with cities and community organizations to implement best practices, pursue funding, and implement programs that reduce the cost of housing to retain and attract employers and employees. Policy LU-4.5 requires the County to evaluate employment generating discretionary development resulting in 30 or more new full-time and full-time-equivalent employees to assess the project's impact on lower-income housing demand within the community in which the project is located or within a 15-minute commute distance of the project. Furthermore, Policy LU-1.6 would ensure that the general plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas, and Policy 8.5 states that the County shall support the development of safe and quality farmworker housing that facilitates a reliable labor force and promotes efficient agricultural operations. Article 16 of the Ventura County Non-Coastal Zoning Ordinance also includes provisions for the minimum required density of affordable housing. As further discussed in Impact 4.14-1, the 2040 General Plan would not displace or eliminate substantial numbers of any housing, including affordable housing.

Therefore, because the 2040 General Plan includes policies and programs to ensure adequate low-income housing for projected increases in low-income employment opportunities through the planning horizon, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.