

15 Population & Housing

15.1 Introduction

This chapter describes the existing setting of the proposed project site as it relates to population and housing; identifies associated regulatory conditions and requirements; presents the criteria used to evaluate potential impacts on population and housing; and identifies mitigation measures to reduce or avoid each significant impact. The significance of each impact after the incorporation of identified mitigation measures is included at the end of this chapter.

Information used to prepare this chapter came from the following sources:

- City of Brentwood General Plan Update, 2014
- City of Brentwood Housing Element, 2015
- City of Brentwood General Plan EIR, *Draft Program Environmental Impact Report* for the 2014 Brentwood General Plan Update, 2014
- Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC), Plan Bay Area

15.2 Scoping Issues Addressed

Written comments and suggestions were provided by members of the public, organizations, and government agencies during the Notice of Preparation (NOP) scoping period conducted from August 4, 2017 through September 5, 2017. The following comments reflect the key issues identified during the NOP comment period regarding population and housing and are addressed in this section:

- Concern that there are already several senior housing facilities in the project vicinity, and that the City has already approved more acceptable locations for senior housing
- Financial/economics: Can high-density housing be mixed in with the low density
- Concern regarding Section-8 housing, more single-family, higher-density or vacancies if proposed project is not approved or subsequently built
- Will proposed project include low-income housing for seniors
- Concerns surrounding home value depreciation, re-evaluate property values and taxes
- Conduct a study to determine if more senior housing is actually needed
- The senior housing map as shown will shut down both neighborhoods
- The addition of these high density senior housing facilities in the midst of the existing low density residential neighborhoods built around beautiful open space, does not make sense

15.3 Environmental Setting

This section presents information on population and housing conditions in Contra Costa County and the City of Brentwood.

15.3.1 Existing and Projected Population

Contra Costa County

Contra Costa County has a current population of approximately 1,139,513 persons (DOF, 2017). Table 15-1 (Population Projections for Contra Costa County and Brentwood: 2010-2040) shows population numbers for the County as determined by the California Department of Finance (DOF). The Association of Bay Area Governments (ABAG) estimates that the population of Contra Costa County will increase to 1,338,400 by 2040. As identified in the table, the population in Contra Costa County is forecasted to grow nearly 36 percent between 2010 and 2040.

City of Brentwood

As of January 2017, the City of Brentwood had an estimated population of 61,055 persons, representing approximately five percent of Contra Costa County’s total population (Department of Finance [DOF], 2017). This represents an approximate 10 percent increase in population from 2014, when the City’s General Plan was comprehensively updated and adopted by the City Council. As identified in Table 15-1 (Population Projections for Contra Costa County and Brentwood: 2010-2040), the population in Brentwood is forecast to grow nearly 57 percent between 2010 and 2040 (City of Brentwood Urban Water Management Plan, 2015) Because the February 2016 ABAG update does not breakdown projections by City, projections included in the 2015 Urban Water Management Plan have been used for 2040 population and household projections.

Whereas the County’s population is projected to increase by 289,375 or 28 percent between 2010 and 2040, population within Brentwood is anticipated to increase by 29,436 or 57 percent over the same time frame. As shown in the table, the population of Brentwood is expected to increase to 80,917 by 2040.

Location	2010	2040	Change (2010-2040)	Percent Change
Contra Costa County	1,049,025	1,338,400	289,375	28%
Brentwood	51,481	80,917	29,436	57%

Source: Department of Finance, Table 2: E-5, 1/1/2017; City of Brentwood, Urban Water Management Plan, 2015.

15.3.2 Existing and Project Housing

Contra Costa County

As shown in Table 15-2 (Housing Units for Contra Costa County and Brentwood), Contra Costa County has an estimated 412,196 housing units with an average of 2.83 persons per household (DOF, 2017) and the City of Brentwood has 19,655 units with an average of 3.22 persons per household.

As reported by the DOF, the vacancy rate is a measure of the availability of housing in a community. It also demonstrates how well the types of units available meet the market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high supply of vacant units may indicate either the existence of a high number of desired units, or an oversupply of units.

The vacancy rate for housing in Contra Costa County is estimated to be 4.3 percent (DOF, 2017). As identified in Table 15-3 (Household Projections for Contra Costa County and Brentwood: 2015-2040), households in Contra Costa County are forecasted to increase by over 24 percent between 2010 and 2040.

Table 15-2: Housing Units for Contra Costa County and Brentwood

Location	2017	Persons per Household	Vacancy Rate
Contra Costa County	412,196	2.83	4.3%
Brentwood	19,655	3.22	3.6%

Source: Department of Finance, Table 2: E-5, 1/1/2017; City of Brentwood, 2015 (Housing Element).

Table 15-3: Household Projections for Contra Costa County and Brentwood: 2015-2040

Location	2010	2017	2040
Contra Costa County	375,364	412,196	464,150
Brentwood	17,523	19,655	27,512 ^a

a) Estimate based on percentage increase consistent with estimated population growth as shown in Table 15-1.
 Source: Department of Finance, Table 2: E-5, 1/1/2017; City of Brentwood, 2015 (Housing Element); City of Brentwood, Urban Water Management Plan, 2015.

City of Brentwood

According to the Department of Finance (2017), as of 2017, the City of Brentwood has approximately 19,655 housing units with an average of 3.22 persons per household (see Table 15-2). The vacancy rate for housing in the City was estimated to be 13.3 percent (DOF, 2017). There is no existing residential development on the proposed project site. According to the General Plan EIR, the City has 36.3 percent of its land area dedicated for single-family residential. Approximately 1 percent of the City’s land area is currently dedicated for multi-family use, which would include senior housing.

The Association of Bay Area Governments (ABAG) determines total housing need for each community in the region based on employment opportunities, market demand for housing, availability of suitable sites and public facilities, community patterns, types and tenure of housing needs, and others. The City’s RHNA allocation for the 2014–2022 period is shown in Table 15-4 (City of Brentwood RHNA Allocation: 2014-2022). The City is required to ensure that sufficient sites that are planned and zoned for housing are available to accommodate its need and to implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs. The extremely low-income need (0 to 30 percent of the area median income) is 50 percent of the allocated very low-income need (234 units).

Table 15-4: City of Brentwood RHNA Allocation: 2014-2022

Income Level	Total Need	Units Built (October 2014)	Remaining Need
Extremely low	117	0	117
Very low	117	1	116
Low	124	1	123
Moderate	123	27	96
Above Moderate	279	290	0
Total	760	319	452

Source: City of Brentwood Housing Element, 2014.

15.3.3 Housing Characteristics

As of 2017, the City of Brentwood had approximately 19,655 housing units (see Table 15-5). Approximately 88 percent of the housing units are single-family detached homes and approximately five percent are multi-family homes comprised of five units or more. Based on the 2011-2015 Census five-year average, owner-occupied units had an average household size of 3.0, and renter-occupied households had an average household size of 3.49 persons, for a citywide average of 3.22 persons per household overall (DOF, 2017). However, average household size varies across demographic groups. For instance, households comprised of seniors (age 55+) have a much lower average household size.

Table 15-5. Housing Units by Type

Income Level	Percent of Total Housing
Single Family (detached)	87%
Five Plus units	6%
Single Family (attached)	3%
Two to Four Units	3%
Mobile Homes	2%

2012 data
Source: City of Brentwood General Plan EIR, 2014.

According to the Plan Bay Area Forecast of Jobs, Population, and Housing, the number of households is expected to continue increasing in Brentwood at a lesser rate than in Contra Costa County as a whole. The number of households in the City is expected to be 27,512 by 2040.

The General Plan includes provisions for meeting the requirements of housing element law, including “promoting housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability” (Government Code section 65583(c)(5)); preparing “an analysis of population and employment trends, analysis and documentation of household characteristics, housing characteristics, including overcrowding, and housing stock condition”; and analyzing “special housing needs” such as with the elderly, disabled, and those requiring emergency shelter (Government Code section 65583(a)).

Senior and Pre-Retirement Age Housing

Between 2010 and 2040 the Bay Area’s population is expected to grow significantly older. As discussed in the 2015 Brentwood Housing Element, people who were 65 and over represented 11 percent of Brentwood’s total population in 2010, an increase of 1 percent over the 2010 65 and over population. According to the Housing Element, the median age of Brentwood residents between 2000 and 2010 decreased from 38.5 in 2000 to 35.6 in 2010.

To accommodate a growing senior population, the City has approved several senior housing facilities and assisted living developments since 2003. These developments include Summerset, The Vineyards at Marsh Creek, Cortona Park, Eskaton Lodge, Brentwood Senior Commons, and Sycamore Place II. In 2014, additional units were approved for the Brentwood Country Club Partners project, located at the southeast corner of Balfour Road and SR 4. The City has been successful in facilitating the development of these senior facilities. Participants in a workshop for the Housing Element identified a need for more housing for seniors, disabled persons, low income households, and persons at risk of homelessness. According to the Housing Element, the City has constructed approximately 356 senior housing single family units since 2007 as well as two assisted living facilities with 250 units. The City expects a continuing demand for various types of age-restricted/assisted living facilities as the active senior population ages in place. This will result in the need for continuous housing options, ranging from independent living units to nursing home facilities.

15.4 Applicable Regulations, Plans, and Standards

15.4.1 Federal

There are no Federal laws specifically related to population and housing.

15.4.2 State

California Housing Element Law

Government Code Sections 65580–65589.8 include provisions related to the requirements for housing elements of local government general plans. Among these requirements, some of the

necessary elements include an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. Additionally, to assure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goals, the statute calls for local jurisdictions to plan for, and allow the construction of, a share of the region's projected housing needs. The share is known as the Regional Housing Needs Allocation (RHNA). The RHNA for the Bay Area is based on a Regional Housing Needs Plan (RHNP) developed by the local council of government. The Association of Bay Area Governments (ABAG) is the lead agency for developing the RHNP for a nine-county area that includes Contra Costa County and the City of Brentwood. The City's RHNA that covers the period from mid-2007 through 2014 includes 2,705 units. The City's RHNA for 2014 through 2022 includes 760 units.

15.4.3 Regional

Association of Bay Area Governments

The Association of Bay Area Governments (ABAG) is the official comprehensive regional planning agency for the San Francisco Bay area, which is composed of nine counties, including Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma. ABAG produces growth forecasts on four-year cycles so that other regional agencies, including the Metropolitan Transportation Commission (MTC) and the Bay Area Air Quality Management District (BAAQMD), can use the forecast to make funding and regulatory decisions. ABAG projections are also the basis for the Regional Transportation Plan and regional Ozone Attainment Plan. The general plans, zoning regulations, and growth management programs of local jurisdictions inform the ABAG projections. The ABAG projections are also developed to reflect the impact of "smart growth" policies and incentives that could be used to shift development patterns from historical trends toward a better jobs-housing balance, increased preservation of open space, and greater development and redevelopment in urban core and transit-accessible areas throughout the ABAG region.

In July 2017, ABAG and the MTC adopted Plan Bay Area 2040 and its associated Environmental Impact Report (EIR). The second such regional housing and transportation plan adopted by MTC and ABAG, Plan Bay Area 2040 is a long-range blueprint to guide transportation investments and land-use decisions through 2040, while meeting the requirements of California's landmark 2008 Senate Bill 375, which calls on each of the state's 18 metropolitan areas to develop a Sustainable Communities Strategy to accommodate future population growth and reduce greenhouse gas emissions from cars and light trucks.

The Action Plan portion of Plan Bay Area 2040 also focuses on economic development, particularly improving transportation access to jobs, increasing middle-wage job creation and maintaining the region's infrastructure. Another focus of the Action Plan is resilience in terms of enhancing climate protection and adaptation efforts, strengthening open space protections, creating healthy and safe communities, and protecting communities against natural hazards.

15.4.4 Local

City of Brentwood General Plan

The proposed project's relevant General Plan policies for population and housing are in this section. Where inconsistencies exist, if any, they are addressed in the respective impact analysis below.

Brentwood Housing Element

The City of Brentwood updated and adopted its Housing Element on April 28, 2015. The Housing Element is one of seven State-required components of local general plans. Brentwood's Housing Element, which focuses on the regional housing needs for the period between 2014 and 2022, includes all the mandatory sections as identified by California law, including an inventory of land parcels that could accommodate its Regional Housing Needs Allocation (RHNA) as set by ABAG. The element outlines housing production objectives, describes strategies to achieve those objectives, examines the local need for special needs populations, identifies adequate sites for housing production serving various income levels, analyzes constraints to new development, and evaluates the Housing Element's consistency with other General Plan elements. A list of relevant Housing Element goals and policies are provided below.

Housing Goal 1: Provide a diversity of housing opportunities to enhance the City's living environment and to satisfy the shelter needs of all Brentwood residents.

- **Policy H 1-1:** Provide adequate residential sites with densities distributed throughout the City for the production of new for-sale and rental residential units, emergency shelters, and transitional and supportive housing sites for existing and future residents.
- **Policy H 1-2:** Endeavor to ensure the supply of safe, decent, and sound housing for all residents.
- **Policy H 1-3:** Provide incentives for water and energy conservation measures in new housing and substantial housing rehabilitation projects.
- **Policy H 1-4:** Ensure that available multi-family rental units for Brentwood's population include an adequate variety of choices of product types, price, unit sizes, amenities, and location of housing in the community and maintain an adequate supply of rental housing available to low- and moderate-income persons. Minimize displacement of tenants, particularly seniors, disabled, and low- and moderate-income residents, in rental apartments and encourage ownership of lower-cost residential units by prior renters through the regulation of condominium conversions.

Housing Goal 2: Provide housing that is affordable to all socio-economic segments of Brentwood's population.

- **Policy H 2-1:** Provide housing affordable and appropriate for a variety of Brentwood households at all economic levels throughout the City.

- Policy H 2-2: Support the use of available local, County, State, and Federal housing assistance programs.

Housing Goal 3: Achieve and maintain an equitable distribution of housing for all economic groups throughout the community.

- Policy H 3-1: Facilitate the integration of new lower income households into the fabric of the community, avoiding, where feasible, identifying housing developments or portions of a development as being restricted to very low, low, or moderate income households
- Policy H 3-2: Facilitate infill and new residential projects within all areas of the City as a means of making each neighborhood more attractive for all types of housing units thereby encouraging future private economic investment in the community.
- Policy H 3-3: Maintain an inventory of lands that equitably distributes, through General Plan land use designations and zoning, low, medium, high, and very high density residential development throughout the community.

Housing Goal 4: Provide equal housing opportunities for all residents of Brentwood.

- Policy H 4-1: Encourage and support the enforcement of laws and regulations prohibiting discrimination in lending practices and in the sale or rental of housing.
- Policy H 4-2: Assure the provision of housing opportunities for those residents of the City who have special housing needs, including farmworkers, the elderly, disabled, developmentally disabled, large families, and the homeless.

Community Services and Facilities Goal 5: Enhance the quality of life for all city residents through the provision of cultural and social resources including quality schools, libraries, medical, and other community services and facilities.

- Policy CSF 5-18: Encourage services and programs that meet the unique needs of seniors within Brentwood, including the establishment of medical facilities, transportation options for seniors and people with mobility disabilities, senior centers, and programs that provide for in-home care and aging-in-place.

The Affordable Housing Program

In 2003, the City adopted an Affordable Housing Ordinance (Chapter 17.725) to ensure new housing developments within the City include new affordable housing opportunities. The purpose of the Affordable Housing Ordinance is to enhance the public welfare and assure that further housing development contributes to the attainment of the City's housing goals as described in the Housing Element of the General Plan, by creating, preserving, maintaining, and protecting affordable housing for households of very-low, low, and moderate income. The Ordinance calls for affordable units to be dispersed with the market rate housing, so as to visually blend in with residential neighborhoods.

The City also provides a nine percent density bonus above mid-range by right and allows even higher densities consistent with the City's Density Bonus Ordinance, in accordance with State law.

15.5 Environmental Impacts and Mitigation Measures

15.5.1 Significance Criteria

The following significance criteria for population and housing were derived from the Environmental Checklist in the State CEQA Guidelines Appendix G. An impact would be considered significant and would require mitigation if it would meet one of the following criteria.

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

15.5.2 Impacts of the Proposed Project

Impact POP-1: Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

The proposed project would result in the development of up to 560 age-restricted housing units and add a maximum population of approximately 840 senior residents. This population estimate is based on the proposed number of residential units multiplied by an estimated average household size for the proposed project, which is 1.5 persons per household for a senior project¹.

The City of Brentwood's population in 2010 was of 51,481 persons. Full buildout of the General Plan within the city limits supports a total population of 80,917. Full buildout within the City's Planning Area would result in a total population of 92,336. An additional 840 people would represent approximately 1 percent of the General Plan's full population buildout within the city limits.

While the City's General Plan did not calculate population growth for the project site, a 1 percent increase would still be within the range of population growth forecast by DOF, which is 80,917 by 2040, a 57 percent increase over Brentwood's 2010 population of 51,481. Therefore, the

¹ The Water Supply Assessment prepared by Coleman Engineering for the Brentwood Golf Course Redevelopment indicates that for a senior project, 1.5 person/unit may be used as an average household size based on conversations with the City of Brentwood for the preparation of the WSA.

proposed project's population growth would be consistent with DOF's projections for the City and with the City's General Plan. Therefore, impacts associated with increased population growth would be less than significant.

Impact POP-2: Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

The proposed project would result in a rezone for portions of the Deer Ridge site (Village One) and the Shadow Lakes site (Village Two) from Semi-Public Facility (SPF) to Residential-High Density (RHD) to allow for the future construction of two age-restricted housing communities. Therefore, while the existing Deer Ridge clubhouse, located at 801 Foothill Drive, would be removed as part of the proposed project, no existing housing would be displaced by the project. Further, the two proposed age-restricted housing communities would result in the construction of up to 560 new units, which would provide additional housing for approximately 840 people.

Implementation of the proposed project would not displace substantial numbers of people, nor would it require the construction of replacement housing elsewhere. As a result, no impacts would occur.

Impact POP-3: Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

As discussed in Impact POP-2, the Deer Ridge and Shadow Lakes sites would support the proposed age-restricted housing communities currently developed as golf course and open space uses. As a result, no existing housing would be displaced by the proposed project and no replacement housing would be required. Further, the two proposed age-restricted housing communities would result in the construction of up to 560 age-restricted residential units, which would provide additional housing for approximately 840 people in the city.

Implementation of the proposed project would not displace substantial numbers of people or require construction of replacement housing elsewhere. As a result, no impacts would occur.

15.5.3 Cumulative Impact Analysis

The geographic context for the analysis of cumulative population and housing impacts includes the City of Brentwood, Contra Costa County, ABAG, the Metropolitan Transportation Commission, and the regional San Francisco Bay Area.

Impact POP-4: Would implementation of the project, in combination with past, present, and reasonably foreseeable future projects result in significant cumulative impacts with respect to population and housing.

As discussed in Impact POP-1, the project would have less-than-significant impacts associated with population growth.

The prior analysis addresses potential impacts in the context of cumulative population and housing growth in the city and county. Potential impacts are assessed relative to the City's General Plan and regional plans. ABAG's regional growth projections reflect recent and past trends, key demographic and economic assumptions, and include local and regional policies. Local jurisdictions participate in the growth forecast development process. As previously discussed, an additional 840 people would represent approximately 1 percent of the General Plan's full population buildout within the city limits. As of January 2017, the City of Brentwood had an estimated population of 61,055 persons, representing approximately five percent of Contra Costa County's total population (Department of Finance [DOF], 2017). This represents an approximate 10 percent increase in population from 2014, when the City's General Plan was comprehensively updated and adopted by the City Council. As identified in the table, the population in Brentwood is forecasted to grow nearly 57 percent between 2010 and 2040.

ABAG released its latest set of regional projections in 2014, which projected that the population growth rate in Brentwood would be less than that of Contra Costa County as a whole during the period 2010-2040. See Table 15-1. Whereas the County's population is projected to increase by 289,375 or 28 percent between 2010 and 2040, population within Brentwood is anticipated to increase by 29,436 or 57 percent over the same time frame. As shown in Table 15-1, the population of Brentwood is expected to increase to 80,917 by 2040. While the City's General Plan did not calculate population growth for the project site, a 1 percent increase is still within the range of population growth forecasted by DOF and ABAG.

Environmental review is required for individual projects located in the city, the county, and the ABAG region so that the potential impacts of each project may be assessed. Project-specific measures would be required, as needed, to reduce significant impacts. The proposed project would not extend infrastructure that would induce additional population growth outside of the project site, and would therefore not combine with other related projects to contribute to a cumulative impact with respect to population growth. Infrastructure would be developed and sized to support the project, and not future projects. Should future projects be developed in the vicinity of the proposed project site, additional capacity and facilities would likely need to be developed at that time.

In summary, the proposed project — when combined with past, present, and reasonably foreseeable future projects — would not cumulatively contribute to significant adverse cumulative impacts to population, housing, or employment. Impacts would be less than significant.

15.5.4 Level of Significance after Mitigation

Table 15-6 (Summary of Impacts and Mitigation Measures – Population & Housing) summarizes the environmental impacts, significance determinations, and any mitigation measures for the proposed project with regards to population and housing.

Table 15-6: Summary of Impacts and Mitigation Measures – Population & Housing

Impact	Impact Significance	Mitigation
Impact POP-1: Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	Less than Significant	None required
Impact POP-2: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	No Impact	None required
Impact POP-3: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	No Impact	None required
Impact POP-4: Would implementation of the project, in combination with past, present, and reasonably foreseeable future projects result in significant cumulative impacts with respect to population and housing.	Less than Significant	None required

15.6 References

- ABAG (Association of Bay Area Governments). 2017. *Plan Bay Area 2040*. Available at: http://2040.planbayarea.org/sites/default/files/2017-07/Regional%20Forecast%20Supplemental%20%20Report_Final_7-2017_0.pdf. Accessed on August 24, 2017.
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