

Addendum to the Initial Study and Negative Declaration for the 2021-2029 Housing Element Update for the City of Carson, California

Introduction

In November 2021, the City of Carson (City) prepared an initial study and a negative declaration (IS/ND) under the California Environmental Quality Act (CEQA) for a General Plan Amendment to update the City of Carson Housing Element for the planning period of 2021-2029 (the Project). On February 1, 2022, the City certified the IS/ND and adopted the Housing Element. The Housing Element is a policy document that does not result in physical changes to the environment but encourages the provision of housing of different incomes within the city.

The City is now proposing some changes to the adopted Housing Element in response to comments provided by the State Department of Housing and Community Development (HCD). This Addendum reviews the changes to the 2021-2029 Housing Element Update and analyzes the potential impacts of and any changes to the existing conditions since the City certified the Initial Study/Negative Declaration. As described in Section 2, CEQA Requirements, an Addendum is appropriate when a subsequent project would only require minor changes to the previous environmental document and the project would not involve substantial changes or changes in circumstances that would result in new significant environmental impacts.

Changes associated with the 2021-2029 Housing Element Update include additional detail relating to public participation and policies related to affirmatively furthering fair housing. In addition, the housing inventory of land suitable and available for residential development has been updated. Information provided related to potential and actual government constraints regarding land use controls and constraints on housing for persons with disabilities has been expanded. Finally, housing programs have been modified and include revised inventories and site analyses.

These changes to the 2021-2029 Housing Element Update would not result in environmental impacts that were not evaluated under the 2021 IS/ND, and no substantial changes in circumstances under the CEQA Guidelines Section 15162(a)(2) have occurred since the adoption of the 2021 IS/ND that would indicate new significant impacts or substantially increase the severity of significant impacts previously identified. The background environmental conditions have not significantly changed since the certification of the 2021 IS/ND. This Addendum also documents that there are no substantial changes in any circumstances that would result in new or substantially greater significant impacts.

In addition, no information that was not known and could not have been known at the time of the 2021 IS/ND shows that new or substantially greater significant impacts would result (see CEQA Guidelines Section 15162[a][3]). The 2021-2029 Housing Element Update does not identify or require adoption of any new mitigation measures.

Since this Addendum does not identify new or substantially greater significant impacts, circulation for public review and comment is not necessary (CEQA Guidelines Section 15164[c]). However, the Carson City Council will consider this Addendum at a public meeting prior to the adoption of the 2021-2029 Housing Element Update (CEQA Guidelines Section 15164[d]). If the Carson City Council approves this Addendum, it must make findings by way of a resolution, including a finding that this Addendum provides the basis and substantial evidence for the decision not to prepare a subsequent EIR (CEQA Guidelines Section 15164[e]).

Applicability and Use of an Addendum

Under CEQA, lead agencies must conduct an evaluation of proposed changes to a project in order to determine whether further environmental analysis is required. (Pub. Resources Code Section 21166; CEQA Guidelines, Section 15162.) Once an EIR or negative declaration has been completed for a project, a lead agency may not require preparation of a subsequent environmental review unless the conditions set forth in Public Resources Code Section 21166 and CEQA Guidelines Section 15162 are satisfied.

Pursuant to CEQA section 21166, when a previous environmental review for a project has been prepared and approved, no subsequent or supplemental environmental review shall be required unless:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

CEQA Guidelines section 15162 further clarifies that:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

If none of the conditions set forth in CEQA Guidelines section 15162(b) allowing a lead agency to prepare a subsequent negative declaration are met, CEQA Guidelines section 15164 authorizes the lead agency to prepare an addendum to the previously approved negative declaration. In relevant part, CEQA Guidelines section 15164 states:

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

Under the instant circumstances, no substantial changes are being made to the proposed Project. The Housing Element is a policy document that does not result in physical changes to the environment. Therefore, the physical effects on the environment are the same. Based on these circumstances, the modified Project does not trigger any of the circumstances that would require preparation of a subsequent EIR or negative declaration under Public Resources Code section 21166 or CEQA Guidelines section 15162, as further set forth in this Addendum.

Description of the Proposed Project:

The description of the Project remains the same as that described on Page 4 of the attached IS/ND.

Environmental Impacts Associated with the Modified Project:

Changed Conditions

Because the elements of the Project will remain the same as the Project previously examined in the attached IS/ND, all direct Project impacts would remain the same as those identified in the attached IS/ND in the absence of any changed conditions in the environment.

Based on its review of the modified Project and its familiarity with the Project environment, the City has determined that the environment in the Project location has not changed in a way that would result in previously unexamined environmental impacts from the Project or an increase in the severity of any of the previously examined environmental impacts.

New Information

Based on its review of the modified project and its familiarity with the project environment, the City has determined that there is not any new information that was not available at the time of the previous IS/ND that would show that the Project may have new or previously unexamined significant impacts on the environment.

Cumulative Impacts

Based on its review of the modified Project and its familiarity with the Project environment, the City has determined that there is not any new information that was not available at the time of the previous IS/ND that would show that the Project may have new or increased cumulative impacts on the environment.

Conclusions:

The modified Project would not result in any new or substantially more significant impacts than those examined in the IS/ND. Moreover, there is no new information and there are no changed conditions that would result in any new or substantially more significant impacts than those examined in the IS/ND.

Mitigation Measures:

Based on its review of the modified Project and its familiarity with the Project environment, the City has determined that there is not any new information that was not available at the time of the previous IS/ND that would show that the any revisions to the previously approved mitigation measures are necessary.

**INITIAL STUDY / ENVIRONMENTAL CHECKLIST AND
NEGATIVE DECLARATION FOR THE
2021-2029 Housing Element Update**

City of Carson, California

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ATTACHMENTS

1. Housing Element Update

1. PROJECT TITLE:

2021-2029 Housing Element Update

2. LEAD AGENCY NAME AND ADDRESS:

City of Carson, 701 E Carson Street, Carson, CA 90745

3. CONTACT PERSON AND PHONE NUMBER:

Alvie Betancourt, Planning Manager (310)-952-1761 x1365

4. PROJECT LOCATION:

City of Carson

5. PROJECT SPONSOR'S NAME AND ADDRESS:

N/A

6. GENERAL PLAN DESIGNATION:

Varies

7. ZONING:

Varies

8. DESCRIPTION OF PROJECT:

California Government Code Section 65302(c) mandates that each city include a Housing Element in its General Plan. The Housing Element is required to identify and analyze existing and projected housing needs and include statements of the city's goals, policies, quantified objectives and scheduled programs for preservation, improvement, and development of housing. Each city, in adopting its Housing Element, must consider economic, environmental, and fiscal factors, as well as community goals as set forth in the General Plan, in compliance with California Government Code Section 65580 et. seq.

The project is a General Plan Amendment to update the City of Carson (City) Housing Element for the planning period of 2021-2029 (hereafter, HEU). The proposed HEU is attached hereto as Attachment 1. This Initial Study evaluates the potential environmental impacts expected to result from adoption of the HEU.

Consistent with state law, the HEU provides a plan to accommodate the City's fair share of affordable housing known as the Regional Housing Needs Assessment, or RHNA. The RHNA is allocated to each region of the state by the California Department of Housing and Community Development in consultation with regional council of governments. The Southern California Association of Governments represents all jurisdictions in Los Angeles County, including Carson.

For the 2021-2029 housing cycle, Los Angeles County has been assigned a RHNA of 812,060 housing units with Carson receiving an allocation of 5,618 units at five income levels (Extremely Low,

Very Low, Low, Moderate, and Above Moderate). While current zoning within the City's major commercial corridors allows for mixed-use development with residential densities up to 25 to 35 dwelling units per acre (with additional densities permitted for affordable or senior dwelling units), the HEU includes an action plan to promote new goals and policies and housing programs to spur infill and redevelopment in these areas. Through implementation of the housing programs, potential housing sites were identified in the Sites Inventory to show the City's ability to accommodate its RHNA allocation. Specifically, the HEU identifies that there are sufficient housing sites to accommodate its share of affordable housing through its inventory of potential housing sites located within underutilized non-vacant opportunity sites which promote infill development and are served by adequate infrastructure. The housing sites have been identified as part of the City's coordinated planning actions underway for the comprehensive update of the City's General Plan, which envisions new development concentrated in the downtown core, in centers outside the core, and expanding on the energy and success of recent corridor development such as that along Carson Street. These centers will contain a mix of uses around major streets, including housing, employment, and neighborhood commercial uses.

The HEU demonstrates that through implementation of the housing programs there will be sufficient housing sites to accommodate the City's fair share of affordable housing especially along commercial corridors, downtown, and infill sites where there are no infrastructure deficiencies. These sites will allow residential development with expected densities of up to 44 dwelling units per acre. Affordable housing development in these target areas will be enhanced through the City's streamlined review of affordable housing pursuant to the requirements of Senate Bill (SB) 35. Such procedures to expedite review and approval may include the development of an application process and SB 35 eligibility checklist that allows completely affordable housing projects to be reviewed through an administrative process.

9. SURROUNDING LAND USES AND SETTING:

The City of Carson covers approximately 19.2 square miles in the southern area of Los Angeles County. The City, located in the South Bay/Harbor area of the county, is bordered by Long Beach to the east, Compton to the north, Torrance to the west, and Los Angeles to the south and west. The City's regional location and planning boundaries are shown in Figures 1 and 2, respectively. The properties included in the HEU Sites Inventory are located within downtown mixed-use areas, high density residential areas, and the Flex District which are all located within transit-served corridors and near key public and commercial amenities, as shown in Figure C-1 of the HEU (Attachment 1).

10. OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:

No other agency is required to approve the Housing Element update, but it will be reviewed by the California Department of Housing and Community Development for the purpose of determining whether it complies with the requirements of the Housing Element Law.

11. NATIVE AMERICAN CONSULTATION:

In accordance with the requirements of Public Resources Code 21080.3.1, the City notified those Native American Tribes both traditionally and culturally affiliated with the project area. These tribes were notified via certified mail and email. As of this date, response and request for notifications has been received by the Gabrieleño Band of Mission Indians.

12. SUMMARY OF ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The project would have the following Potentially Significant Impacts to the resource areas listed below. A summary of the environmental factors potentially affected by this project, consisting of a Potentially Significant Impact or Potentially Significant Impact Unless Mitigated, include:

- | | | |
|----------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

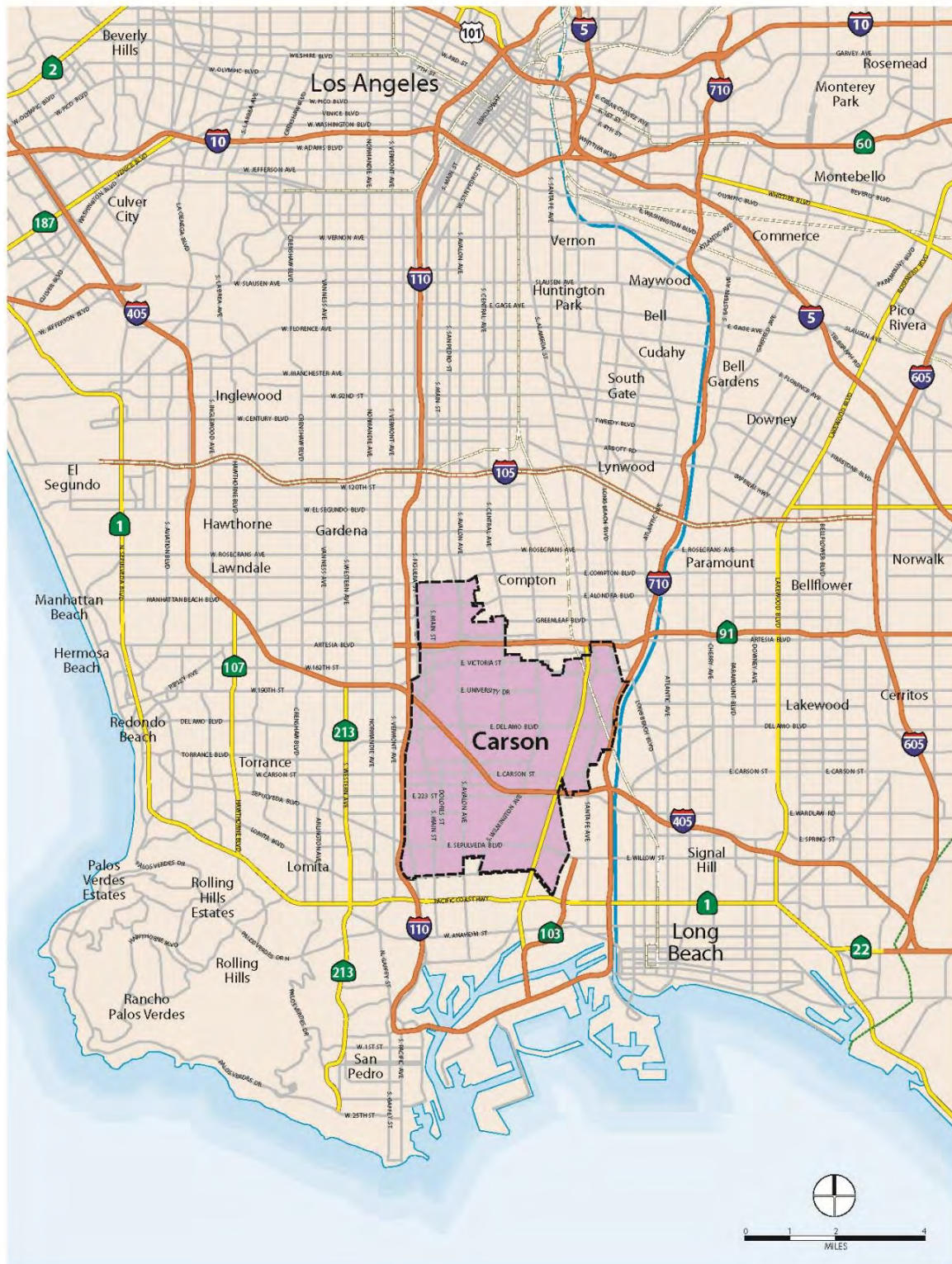
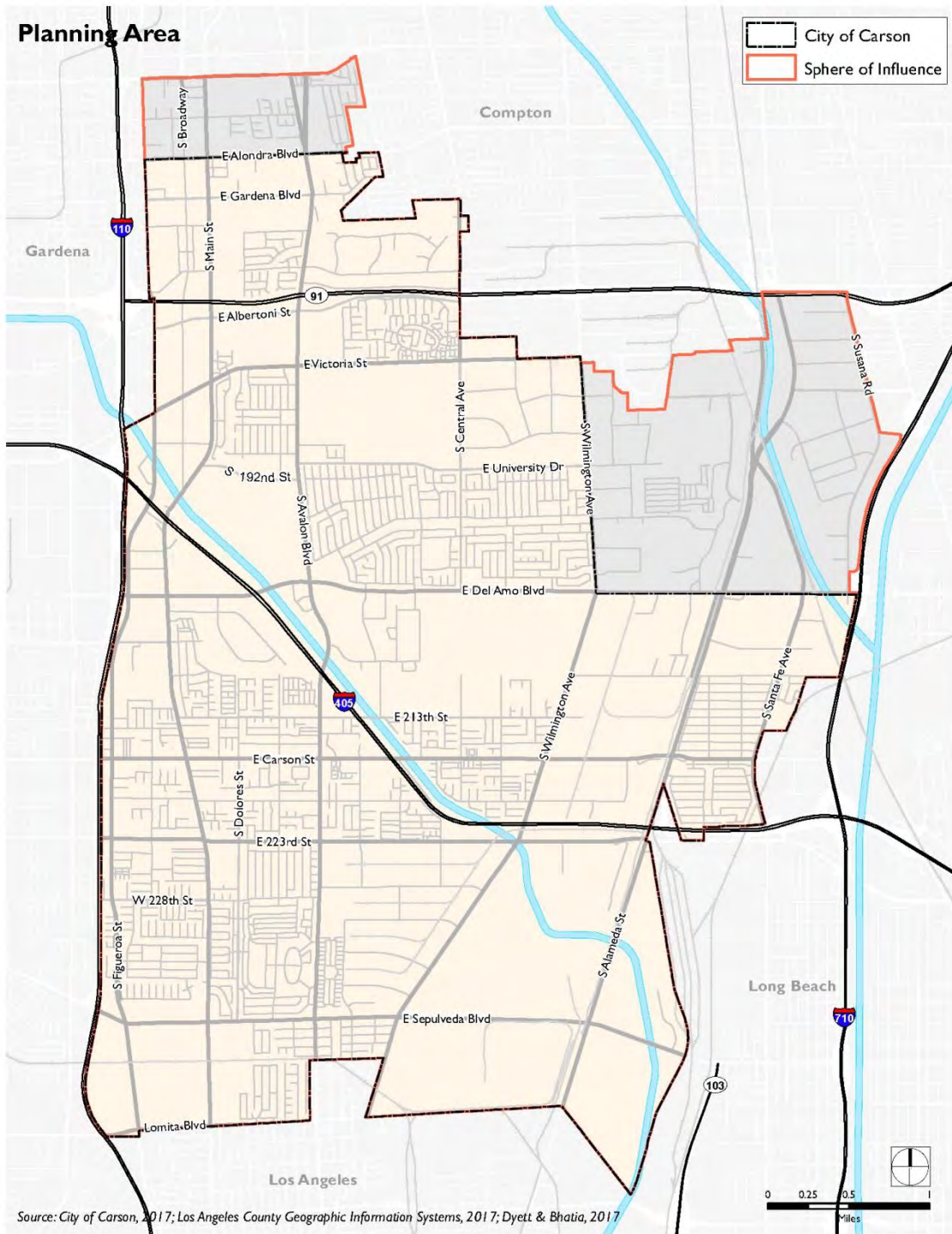
Figure 1: Regional Setting

Figure 2: Planning Boundaries

13. ENVIRONMENTAL CHECKLIST:

This section analyzes the potential environmental impacts that may result from the proposed project. For the evaluation of potential impacts, the questions in the Initial Study Checklist (Section 2) are stated and answers are provided according to the analysis undertaken as part of the Initial Study. The analysis considers the project's short-term impacts (construction-related), and its operational or day-to-day impacts. For each question, there are four possible responses. They include:

1. *No Impact.* Future development arising from the project's implementation will not have any measurable environmental impact on the environment and no additional analysis is required.
2. *Less than Significant Impact.* The development associated with project implementation will have the potential to impact the environment; these impacts, however, will be less than the levels or thresholds that are considered significant and no additional analysis is required.
3. *Potentially Significant Unless Mitigated.* The development will have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the project's physical or operational characteristics can reduce these impacts to levels that are less than significant.
4. *Potentially Significant Impact.* Future implementation will have impacts that are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.1 AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic building along a State- designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–d. No Impact. The HEU is a policy document, and its adoption would not, in itself, produce environmental impacts. It consists of a housing program; no actual development or rezoning is proposed as part of the HEU. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, which specifies a need for the production of 5,618 units.

To accommodate this RHNA allocation, the HEU includes programs that would allow mixed uses with residential densities between 25 and 44 dwelling units per acre primarily within the City's commercial corridors and downtown. Affordable housing development in these target areas will be enhanced through the City's expedited review and approval of development applications that allows completely affordable housing projects to be reviewed through an administrative process. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance to ensure the quality of development at each housing site. Potential impacts to aesthetics associated with future residential development projects would be assessed at the time when the specific development projects are proposed, and mitigation measures would be adopted, as necessary, in conformance with the California Environmental Quality Act (CEQA). However, adoption of the HEU would result in no impact to visual resources because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.2 AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–e. No Impact. The HEU is a policy document, consisting of a housing program, and its adoption would not, in itself, produce environmental impacts. It consists of a housing program; no actual development or rezoning is proposed as part of the HEU. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, such development would not impact agricultural resources.

The Farmland Mapping and Monitoring Program (FMMP) designates some areas within the City as Unique Farmland (DOC 2021), which are mostly occupied by nurseries. As development anticipated by the HEU would occur within commercial corridors, urban infill sites and nonvacant underutilized sites, this designated farmland would retain its existing use. In addition, no land within the City is zoned for agriculture or is under a Williamson Act contract. Finally, because the City does not contain forest land, there is no housing program that would affect forest land, or timber property zoned as Timberland Production. Adoption of the HEU would result in no impact to agriculture and forestry resources because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.3 AIR QUALITY. Where applicable, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under the applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–c. No Impact. The HEU is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the HEU. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation.

The City is located within the South Coast Air Basin (Air Basin). The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Air Basin and air quality management plans (AQMP) to achieve air quality standards. The Air Basin is an area designated as non-attainment because it does not currently meet National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for certain pollutants regulated under the Clean Air Act and California Clean Air Act, respectively. Specifically, the Air Basin does not meet the NAAQS for ozone, PM_{2.5}, and in some portions of the basin, lead, and it does meet the CAAQS for ozone, PM₁₀, and PM_{2.5}.

The HEU would not conflict with or obstruct implementation of the State Implementation Plan and the South Coast Air Quality Management District's regional Air Quality Management Plan (AQMP) because the growth anticipated in the HEU (RHNA allocation) is consistent with Southern California Association of Governments growth projections that were also factored into the AQMP. Because no development is currently proposed, the HEU would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard, nor would it expose sensitive receptors to substantial pollutant concentrations. Future residential projects would be required to show consistency with the AQMP and potential project-specific long- and short-term impacts to air quality would be assessed at the time the projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact to air quality because no development is proposed at this time.

d. No Impact. Residential development does not create substantial odors. Because no development is currently proposed, development anticipated by the HEU would not result in other emissions (such as

those leading to odors) that would adversely affect a substantial number of people, and its adoption would have no impact from odors.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.4 BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–d. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation.

Government Code Section 65583.2(c) requires that local jurisdictions determine their realistic capacity for new housing growth by means of a parcel-level analysis of land resources with the potential to accommodate residential uses. The analysis of potential to accommodate new housing growth considered environmental factors which includes sensitive habitat. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, future development would not be anticipated to significantly impact biological resources. Residential projects completed to meet the RHNA allocation are located downtown, along commercial corridors, and on infill sites within urbanized areas or within nonvacant underutilized sites. Infill sites are located within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of sensitive species habitat, riparian habitat, a sensitive natural community, federally protected wetlands, wildlife corridors, or nursery sites. However, depending on the location, future development in the City may have the potential to affect important biological resources. The potential impacts to various biological resources of future residential projects would be assessed at the time specific development projects

are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact to biological resources because no development is proposed at this time.

e–f. No Impact. Development anticipated by the HEU would be required to adhere to the existing City of Carson Tree Preservation and Protection Ordinance. Due to the lack of biological resources and heavily developed nature of the City, there are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans adopted for the City. As a result, the HEU would not conflict with any local, regional, or state policies, plans, or ordinances protecting biological resources, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.5 CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–c. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Depending on the location, future development in the City has the potential to cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5, cause a substantial adverse change in the significance of an archaeological resource pursuant to Guidelines Section 15064.5, or disturb human remains, including those interred outside of a formal cemetery. The HEU would not change or alter policies to protect cultural resources. The potential impacts to cultural resources of future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact to cultural resources because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.6 ENERGY. Would the project:				
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and b. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. While energy resources would be consumed during construction of future residential development consistent with the HEU, potential impacts to energy resources of future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. In addition, individual residential development projects would be required to comply with current Building Energy Efficiency Standards, which are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. Furthermore, individual residential development projects would also be subject to the California Green Building Standards Code (CALGreen), which addresses a variety of aspects of sustainable building practices involving water and energy conservation. However, adoption of the HEU would result in no impact to energy resources because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.7 GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a (i-iv). No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, depending on the location, future development in the City has the potential to expose people or structures to potential substantial adverse effects from geologic hazards. This could include rupture of a known earthquake fault, strong seismic ground shaking, and seismicity-related ground failure, including liquefaction, and landslides.

Similar to most areas in Southern California, the City lies within a region known to be seismically active and is subject to periodic seismic shaking due to earthquakes along remote or regional faults. Therefore, the potential exists for people and structures associated with new residential projects to be exposed to strong ground shaking, ground failure, and soil instability. All future development consistent with the HEU would be conducted in accordance with the City's grading guidelines, the current California Building Codes, and the specifications outlined in project-specific Geotechnical Investigations. Potential impacts related to seismic and geological hazards of future residential projects would be assessed at the time the specific development projects are proposed. Future projects would be required to comply with all relevant building standards and project-specific geotechnical design measures ensuring that impacts associated

with seismic and geological hazards would be less than significant. However, adoption of the HEU would result in no impact related to geological hazards because no development is proposed at this time.

b. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Future development consistent with the HEU would be required to comply with the City's grading ordinance (Carson Municipal Code – § 9166.1) and the County of Los Angeles Grading Guidelines using Best Management Practices (BMPs). Appropriate project-specific conditions and/or mitigation measures to reduce potential impacts associated with soil erosion or the loss of topsoil would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to soil erosion because no development is proposed at this time.

c and d. No Impact. As described in the City General Plan Safety Element (2004), susceptibility of slopes to landslides and other forms of slope failure are due to steep sloped, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity. Due to the relative absence of significant elevation changes in the City, slope instability in Carson is limited to the slopes adjacent to the flood control channels that intersect the City. The loose unconsolidated nature of the sediments, exposed to slopes that are not faced with concrete may cause the slopes to be unstable at the surficial level. Potential impacts from landslide, liquefaction and/or expansive soils associated with future residential development projects would be assessed at the time when the specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Future projects would be required to comply with the recommendations of the project-specific Preliminary Geotechnical Investigation, which would ensure removal of unsuitable soils and proper fill and compaction would occur during grading and construction activities to avoid assessed hazards. However, adoption of the HEU would result in no impact related to landslide, liquefaction and/or expansive soils because no development is proposed at this time.

e. No Impact. The entirety of the City is served by established wastewater conveyance and treatment services. Future development consistent with the HEU would connect to existing sewer trunk lines or future expansion of sewer trunk lines; the use of septic tanks or alternative wastewater systems would not be required. As a result, no impact would occur.

f. No Impact. The City is located within the Peninsular Ranges Geomorphic Province of Southern California. This area is characterized by Cretaceous age igneous rock (granitic rock) referred to as the Southern California batholith. Older Jurassic age metavolcanic and metasedimentary rocks and older Paleozoic limestone, altered schist, and gneiss are present within the province. Cretaceous-age marine sedimentary rocks and younger Tertiary-age rocks comprised of volcanic, marine, and non-marine sediments overlie the older rocks. More recent Quaternary sediments, primarily of alluvial origin, comprise the low-lying valley and drainage areas within the region. The Natural History Museums of Los Angeles County has indicated that grading or shallow excavations in the upper feet of the old lagoonal deposits or the younger Quaternary Alluvium deposits are unlikely to uncover fossil vertebrate remains. However, deeper excavations in the city reaching down into older Quaternary deposits, as well as excavations in older Quaternary deposits found at the surface have the potential for producing vertebrate fossils. Potential impacts to paleontological resources located within the housing sites would be assessed at the time the projects are

proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact to paleontological resources because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.8 GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and b. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. According to the U.S. Environmental Protection Agency, the burning of fossil fuels, along with deforestation, has caused the concentrations of heat-trapping greenhouse gasses (GHGs) to increase significantly in the earth's atmosphere (U.S. Environmental Protection Agency 2017). The increase in GHGs results in global warming, as more heat is trapped in the atmosphere. The potential impacts related to GHG emissions and global warming associated with future residential projects would be assessed at the time specific development projects are proposed. The City adopted its Climate Action Plan (CAP) in 2017. Future projects consistent with the HEU would be required to show consistency with the GHG reduction measures in the City of Carson CAP as applicable under CEQA. Specifically, future project's inclusion of GHG reduction measures would assist the City in meeting its GHG reduction goals. However, adoption of the HEU would result in no impact related to GHG emissions because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.9 HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–c. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Because no development would occur as a result of approval of the HEU, approval of the HEU would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous material, nor create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Further, as a policy document, approval of the HEU would not result in the emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of existing or proposed schools. The potential impacts related to hazards and hazardous materials for future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. In addition, development anticipated by the HEU would be required to comply with all applicable federal, state, and local regulations related to the transportation, use, and storage of hazardous materials. However, adoption of the HEU would result in no impact related to hazards and hazardous materials because no development is proposed at this time.

d. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. At the time of individual development proposals, the sites of proposed future residential projects would be evaluated using appropriate databases including the California Department of Toxic Substances Control's EnviroStor database which, pursuant to Government Code

Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action site, and the State Water Resources Control Board's GeoTracker database, which tracks authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects would be assessed at the time the projects are proposed mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to hazardous material sites because no development is proposed at this time.

e. No Impact. No specific development would occur as a result of the approval of the HEU. Any potential impacts related to airport hazards for any specific future residential projects would be assessed at the time the projects are proposed. The Compton/Woodley Airport is the only airport located within two miles of the City limits. Future projects within the airport land use plan for the Compton/Woodley airport would be required to show consistency with airport safety issues, specifically related to height, noise, and safety. However, adoption of the HEU would result in no impact related to airport hazards because no development is proposed at this time.

f. No Impact. The HEU would be consistent with all related General Plan policies. This includes policies addressing the City's emergency response plans. Approval of the HEU would not result in the construction of any projects. All future development would be reviewed to ensure that they are consistent with and would not physically interfere with an adopted emergency response plan or emergency evacuation plan. However, adoption of the HEU would result in no impact related to emergency or evacuation plans because no development is proposed at this time.

g. No Impact. According to the map of Very Fire Hazard Severity Zones in local responsibility areas for Los Angeles County, the City is not within a VHFHSZ, nor is it in the vicinity of one. Approval of the HEU would not result in any specific development projects and would not, in itself, expose people to wildfire hazards. Future development would be required to show fire safety measures consistent with the City's regulations related to fire safety and ensure that it would not interfere with emergency response plans related to risk from fire (see also Section 13.20 of this study). Therefore, approval of the HEU would result in no impact relative to wildland fires.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.10 HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and c (i–iv). No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Residential projects completed to meet the RHNA requirement are expected to be located on infill sites in urbanized areas or within nonvacant underutilized sites and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with water quality. Future development consistent with the HEU would be required to adhere to all applicable federal, State and local regulations including the City's Storm Water Management and Discharge Control Ordinance (Article 5, Chapter 8) which requires projects to incorporate construction and post-construction BMPs to ensure storm water runoff is controlled in a manner that would minimize water quality degradation, ensure that drainage patterns were not altered, and substantial erosion would not occur. Conformance with federal, State, and local regulations would also ensure that future projects would not result in increased rates or amounts of surface runoff, exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flood flows. Project-specific effects would be assessed at the time future development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to polluted run-off because no development is proposed at this time.

b and e. No Impact. The Coastal Plain of Los Angeles County is made up of two groundwater basins, the Central Basin and the West Coast Basin. Most of the City of Carson is located within the West Coast Basin, with a small portion of the city (northeastern corner of the planning area) located in the Central Basin. The City of Carson is almost entirely built out with impervious surfaces. Future development consistent with the HEU would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. Additionally, the groundwater recharge basins for the Central Basin are in the Rio Hondo and San Gabriel Coastal Spreading Grounds along the Rio Hondo and the San Gabriel Rivers and groundwater recharge for the West Coast Basin is primarily done through injection wells. Therefore, replenishment of groundwater is not reliant on natural recharge or percolation within the city. No impact to groundwater would occur.

d. No Impact. Each of the potential housing sites were reviewed on the City's land use and zoning maps to confirm high-density housing as a permitted land use. Sites zoned for high-density residential uses were then viewed on aerial photography and field assessments to verify street access, existing land use, and lot dimensions. Potential development constraints were then identified, including Federal Emergency Management Agency flood panels. Sites with a high risk of flood hazard were excluded from the inventory. In addition, potential impacts related to flood hazard, tsunami, or seiche zones, and risk release of pollutants due to project inundation, would be assessed at the time future development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to flooding because no development is proposed at this time.

e. No Impact. As discussed above, future development consistent with the HEU would be required to adhere to all applicable federal, State and local regulations with respect to water quality. Both the West Coast and Central basins were adjudicated in the 1960s, which limits the amount of water that can be withdrawn. Adjudicated basins are not required to prepare sustainable groundwater management plans. As a result, no plans have been prepared for either the West Coast or Central Basins. For these reasons, future development consistent with the HEU would not substantially degrade water quality or conflict with a sustainable groundwater management plan, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.11 LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones in appropriate locations to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Although implementation of the programs contained in the document would encourage residential development required to meet the City's RHNA allocation, such residential projects are expected to be located on commercial corridors and infill sites within urbanized areas or within nonvacant underutilized sites. Because commercial corridors and infill sites are part of the existing urban fabric, projects developed on them would not be likely to physically divide an established community. Potential impacts would be evaluated at the time specific development projects are proposed. However, adoption of the HEU would result in no impact related to physically dividing a community because no development is proposed at this time.

b. No Impact. The HEU is consistent with the Land Use Map associated with the proposed 2040 General Plan update that is anticipated to be adopted in Spring 2022. The plan identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units, and strategically further fair housing opportunities. To accommodate the RHNA allocation, the plan

proposes an increase in residential densities, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas.

The land use designations associated with the plan are not under consideration at this time and the amendments will be processed as part of the proposed 2040 General Plan update. Related zoning amendments will be processed after adoption of the 2040 General Plan. Adopting the HEU would be inconsistent with the City's existing General Plan until land use and zoning amendments are adopted and implemented. Once the City has adopted the proposed 2040 General Plan update (anticipated Spring 2022), a comprehensive update to the Zoning Code will follow to ensure that the Zoning Code is consistent with and effectively implements the 2040 General Plan. Future development that implements the plan could not occur until any necessary General Plan amendments and rezoning are adopted. However, adopting the plan does not specifically propose any development projects, meaning no physical environmental impacts would occur. While the proposed 2040 General Plan update is currently inconsistent with the adopted General Plan, no physical environmental impacts would occur from this inconsistency. When adopting the 2040 General Plan, the plan would be consistent with the updated Land Use Element and Land Use Map. Any potential environmental impacts associated with adopting the Land Use Plan would be evaluated and mitigated, as necessary, during the environmental review process for the proposed 2040 General Plan update. Therefore, no conflict would remain upon adopting the 2040 General Plan. Adopting the proposed 2040 General Plan update, anticipated for Spring 2022, and addressing the zoning code amendments within the required timeframe,¹ would result in consistency between the Land Use Element and HEU. Therefore, adopting the plan would not conflict with applicable land use plans, policies, or regulations, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.12 MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land-use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and b. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate

¹ On September 28, 2021, Governor Newsom approved Assembly Bill (AB) 1398 to ensure that cities and counties are adequately rezoning to meet their housing needs. AB 1398 reduces the allowable timeframe for rezoning for jurisdictions that do not adopt a housing element that HCD finds to be in substantial compliance with state law within 120 days of the statutory deadline. Previously three years were allowed for the rezoning if the Housing Element was adopted within 120 days of the statutory deadline. AB 1398 requires a jurisdiction that does not adopt a housing element that HCD finds to be in substantial compliance with state law within 120 days of the statutory deadline to complete rezoning no later than one year from the statutory deadline for the adoption of the housing element. AB 1398 amends Government Code Sections 65583, 65583.2, and 65588.

development required to meet City's RHNA allocation. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, future development would not be anticipated to significantly impact mineral resources. As discussed in the General Plan Program Environmental Impact Report, no known mineral resources or locally important mineral resource recovery sites are located within the City. Therefore, adoption of the HEU would result in no impact to mineral resources.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.13 NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Generation of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–b. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The majority of development is expected on commercial corridors and infill sites within urbanized areas or within nonvacant underutilized sites. During construction activities associated with future residential development, the potential would exist for temporary or periodic increases in noise levels and/or ground-borne noise and vibration levels on and adjacent to project sites. The degree of such increases would depend on the type and intensity of construction activity, equipment type used, duration of equipment used, and distance between the noise source and noise receiver. Residential development also has the potential to result in incremental increases in long-term noise levels generated by increased vehicular traffic as well as new stationary sources of noise. Adherence to the City's Noise Control Ordinance and compliance with General Plan Noise Element Policies would ensure that any such noise and vibration increases, both temporary and permanent, would result in less than significant impacts within project areas. The potential impacts related to noise for future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to noise because no development is proposed at this time.

c. No Impact. The City of Carson is not located within the vicinity of a private airstrip or airport land use plan, or where such a plan has not been adopted, is not located within two miles of a public airport or public use airport. The Compton/Woodley Airport is located approximately one-half mile to the northwest of the City while the Long Beach International and Los Angeles International airports are located approximately 13 miles and 12.7 miles to the southeast and the northwest of the city, respectively. The City is

affected by the overflight of airplanes from these airports, but is not within the 60 dBA CNEL of any of these airports, which would trigger the need for a noise assessment for proposed sensitive uses. Therefore, future development consistent with the HEU would not expose people residing or working in the project area to excessive noise levels, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.14 POPULATION & HOUSING. Would the project:				
a. Induce substantial unplanned 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The HEU utilizes the 2021-2029 RHNA to plan for and accommodate population growth. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Future development would also occur on nonvacant underutilized sites. This type of infill development is designed to focus on redevelopment and revitalization of areas already served by infrastructure and would not require extensions of roads or other infrastructure. With the implementation of rezoning and additional programs in the HEU to increase housing capacity, there would be adequate land available to accommodate the City's RHNA allocation. Therefore, the HEU would result in no impact associated with population growth, either directly or indirectly.

b. No Impact. The HEU would ultimately require rezones to accommodate the RHNA allocation, thereby increasing capacity for new housing. Additionally, the HEU requires adequate supply of housing at all income levels, including replacement of any existing or protected units demolished during redevelopment, as well as adequate mitigation of impacts on displaced residents, such as those living in mobilehome parks, per State law. The HEU also protects the existing housing stock, especially affordable units, by supporting rehabilitation and protecting units at risk of conversion to market-rate housing. For these reasons, future development consistent with the HEU would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.15 PUBLIC SERVICES. Would the project:				

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a (i-v). No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Residential development of this magnitude would be expected to increase the demand for public services. Development anticipated by the HEU would primarily occur within existing service areas, and thus would be located close to existing fire and police stations. In addition, it is estimated that existing school facilities have sufficient capacity to accommodate future public-school students generated by development anticipated by the HEU. As discussed below in Section 13.19, Recreation, development anticipated by the HEU would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and development anticipated by the HEU would also not have a significant impact due to inclusion of recreational facilities or required construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Finally, development anticipated by the HEU is not expected to place a substantial burden on other public facilities, such as administrative facilities and libraries. Should public service facilities need to be constructed in the future, construction of those facilities could result in environmental impacts. All new or expanded public service facilities would be subject to CEQA requirements for environmental assessment, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated. However, based on existing regulations, the construction of these public service facility projects would be required to implement measures to protect significant biological and cultural resources, reduce air and GHG emissions, and reduce noise, and thus environmental effects are expected to be minimal. As no development is proposed at this time, no impact associated with the provision of new or expanded public service facilities would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.16 RECREATION. Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and b. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Additional residential development may result in the increased use of existing recreational facilities or the need for construction or expansion of recreational facilities to meet the needs of new residents. Should new or expanded recreational facilities be constructed in the future, construction of those facilities could result in environmental impacts. All new or expanded recreational facilities would be subject to CEQA requirements for environmental assessment, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated. However, based on existing regulations, the construction of these recreational projects would be required to implement measures to protect significant biological and cultural resources, reduce air and GHG emissions, and reduce noise, and thus environmental effects are expected to be minimal. As no development is proposed at this time, no impact associated with the provision of new or expanded recreational facilities would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.17 TRANSPORTATION. Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate

development required to meet the City's RHNA allocation. New residential development would typically be expected to result in additional vehicular trips and the increased use of streets (for all modes of transportation). The development anticipated by the HEU would occur within commercial corridors, urban infill sites and nonvacant underutilized sites and consist of various housing types. Future development would be consistent with the City's Transportation Element and CAP, which includes everything from how local and regional traffic will circulate through the City under both existing and future conditions, as well as, addressing the needs of bicyclists, pedestrians, and transit and rail users. Therefore, future development consistent with the HEU would be expected to generate fewer vehicular trips and more multi-modal trips than conventional development. As a result, future development consistent with the HEU would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Potential conflicts with transportation plans associated with future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to conflicts with transportation plans because no development is proposed at this time.

b. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Potential traffic impacts related to increased Vehicle Miles Traveled (VMT) with future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to VMT because no development is proposed at this time.

c-d. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Access locations for future development consistent with the HEU development would be designed to the City's standards. Potential traffic impacts related to traffic hazards and emergency access with future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to traffic hazards and emergency access because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.18 TRIBAL CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision(c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a (i and ii). No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Future development would be required to follow the protocol pursuant to Assembly Bill 52 and Senate Bill 18 regarding notification and consultation with Native American Tribes. As a result, tribal cultural resources would be properly identified, and mitigation measures would be proposed to reduce impacts on these resources. The potential impacts to tribal cultural resources of future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact to tribal cultural resources because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.19 UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
c. Result in a determination by the wastewater treatment provider which serves, or may serve, the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. New residential development would be expected to increase the burden on existing utilities and service systems involving water, wastewater treatment storm water drainage, and solid waste disposal. Surface water supplied to the City of Carson is treated at the F.E. Weymouth treatment plant, which is located in La Verne, while wastewater generated in the City is treated at the Joint Water Pollution Control Plant, which is located in Carson. The F.E. Weymouth facility has a capacity of 520 million gallons per day (MGD) and is currently treats an average of 224 MGD while the Joint Water Pollution Control Plant has a design capacity of 400 MGD and currently treats an average of 260 MGD. As a result, these facilities have sufficient remaining capacity to treat the full increase in water demand and sewage attributable to future development consistent with the HEU. In addition, because the development anticipated by the HEU would occur primarily on nonvacant underutilized sites already served by well-established utilities service systems, there would not be a significant need for the expansion of existing systems or the construction of new systems, in compliance with applicable statutes and regulations. However, should upgrades to infrastructure be required as a result of new development, construction of those facilities could result in environmental impacts. All new or expanded infrastructure projects would be subject to CEQA requirements for environmental assessment, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated. However, based on existing regulations, the construction of these infrastructure projects would be required to implement measures to protect significant biological and cultural resources, reduce air and GHG emissions, and reduce noise, and thus environmental effects are expected to be minimal. As no development is proposed at this time, no impact associated with the provision of new or expanded infrastructure would occur.

b. No Impact. The City's potable water sources are supplied by the California Water Service Company (Cal Water) Dominguez District and by Southern California Water Company (SCWC) Southwest District. Cal Water serves approximately 87 percent of the City of Carson with the other 13 percent served by SCWC. Water is provided to the City from groundwater sources, treated surface water purchased from the Metropolitan Water District (MWD) of Southern California, and recycled water. As stated in the 2020 Urban Water Management Plan (UWMP) for Cal Water, purchased water is 100 percent reliable and would make up the differences between demand and other projected supplies (groundwater and recycled water). As a result, Cal Water has adequate supplies to meet demand under normal, single dry year, and five

consecutive dry year conditions through the year 2045 (Cal Water 2021). In addition, as stated in the GSWC 2020 UWMP, GSWC also has reliable supplies to meet demand under normal, single dry year, and five consecutive dry year conditions through the year 2045 (GSWC 2021). Future development would be required to ensure that adequate water supplies would be available to serve the project's projected demand in addition to the provider's existing commitments. The potential impacts related to water supply for future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to water supply because no development is proposed at this time.

c. No Impact. As discussed above, the wastewater treatment facility serving the City of Carson has sufficient remaining capacity to treat the full increase in sewage attributable to future development consistent with the HEU. The potential impacts related to wastewater treatment capacity for future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to wastewater treatment capacity because no development is proposed at this time.

D and e. No Impact. A majority of the solid waste generated in the City of Carson is disposed of at the El Sobrante and H.M Holloway Inc. landfills. The El Sobrante Landfill has a remaining capacity of about 144 million tons, and it is expected to remain in operation until 2051 (CalRecycle 2021a). The H.M. Holloway Inc. Landfill has a remaining capacity of about 7.5 million tons, and is expected to remain in operation until 2030 (CalRecycle 2021b). Given the remaining disposal capacity of these landfills, enough capacity exists to receive solid waste generated by future development consistent with the HEU. Additionally, future projects would be required to show that they would not generate solid waste in excess of state or local standards, or otherwise impair the attainment of solid waste reduction goals, and would comply with federal, state, and local management and reduction statutes and regulation related to solid waste. The potential impacts related to solid waste for future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impact related to solid waste because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.20 WILDFIRE. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–d. No Impact. The HEU is a policy document, consisting of a housing program. While implementation of the HEU would ultimately require rezones to accommodate the RHNA allocation, rezones would not be approved as part of the current action. Therefore, its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The City of Carson is not located in or near a state responsibility area or land classified as a very high fire hazard severity (CALFIRE 2007). The City is located within a local responsibility area in a highly urbanized environment that is far from areas with high wildfire risk. Future development consistent with the HEU would be reviewed for consistency with fire protection development standards and hazard abatement in accordance with state, regional, and local policies. Specifically, individual projects would be required to lower fire risk through best practices such as weed abatement, adequate emergency vehicle access, use of non-combustible building materials, and adequate water pressure to ensure fire safety. The potential impacts related to wildland fire for future residential projects would be assessed at the time specific development projects are proposed. However, adoption of the HEU would result in no impact related to wildfire because no development is proposed at this time.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.21 MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range, of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–c. No Impact. As discussed throughout the above portions of the Initial Study Checklist, the HEU is a policy document and its adoption would not, in itself, produce environmental impacts. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, the HEU does not identify, describe, promote, entitle, or permit any particular residential development project. The act of adopting the updated HEU does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered, or threatened species; historic resources; or human beings. Potential impacts resulting from the development of future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. However, adoption of the HEU would result in no impacts because no development is proposed at this time.

14. PREPARATION. THE INITIAL STUDY FOR THE SUBJECT PROJECT WAS PREPARED BY:

Dyett & Bhatia, Urban and Regional Planners, on behalf of the City of Carson.

15. DETERMINATION. (REDEVELOPMENT DEPARTMENT) BASED ON THIS INITIAL EVALUATION:

- [X] I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- [] I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, and nothing further is required.

16. DE MINIMIS FEE DETERMINATION (CHAPTER 1706, STATUTES OF 1990-AB 3158)

- ☒ It is hereby found that this project involves no potential for any adverse effect, either individually or cumulatively, on wildlife resources and that a "Certificate of Fee Exemption" shall be prepared for this project.
- ☐ It is hereby found that this project could potentially impact wildlife, individually or cumulatively, and therefore fees shall be paid to the County Clerk in accordance with Section 711.4(d) of the Fish and Game Code.

17. ENVIRONMENTAL DETERMINATION: THE INITIAL STUDY FOR THIS PROJECT HAS BEEN REVIEWED AND THE ENVIRONMENTAL DETERMINATION, CONTAINED IN SECTION V. PRECEDING, IS HEREBY APPROVED:

Alvaro Betancourt

Alvie Betancourt, Planning Manager
City of Carson

18. REFERENCES

California Air Resources Board (CARB)

2020 Ambient Air Quality Standards. October.

California Department of Conservation (DOC)

2021. California Important Farmland Finder. Available: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

California Department of Forestry and Fire Protection (CAL FIRE)

2007 Fire Hazard Severity Zones in SRA – Los Angeles County. Available: https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf.

California Department of Resources Recycling and Recovery (CalRecycle)

2021a SWIS Facility/Site Activity Details: El Sobrante Landfill (33-AA-0217). Available at <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402>

2021b SWIS Facility/Site Activity Details: H.M. Holloway Inc. (15-AA-0308). Available at <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3947?siteID=758>

California Water Service (Cal Water)

2021 2020 Urban Water Management Plan (Dominguez District). June.

Carson, City of

2002 General Plan Environmental Impact Report

2004 General Plan Update

2017 Climate Action Plan

2021 Municipal Code

Golden State Water Company (GSWC)

2021 2020 Urban Water Management Plan Southwest Service Area. July.

U.S. Environmental Protection Agency (U.S. EPA)

2017 Climate Change: Basic Information. Available at: <https://19january2017snapshot.epa.gov/climatechange/climate-change->

ATTACHMENT 1
Housing Element Update



2021-2029 Housing Element Update

DRAFT- September 2021

Prepared by

DYETT & BHATIA

Urban and Regional Planners

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I Introduction

The City of Carson covers approximately 19.2 square miles in the southern area of Los Angeles County. The City, located in the South Bay/Harbor area of the county, is bordered by Long Beach to the east, Compton to the north, Torrance to the west, and Los Angeles to the south and west. Unincorporated areas of Los Angeles County also surround Carson to the north, east and west. The western boundary of the city is formed by Interstate 110 (south of 190th Street/Victoria Street) and by Figueroa Street (north of 190th Street/Victoria Street). The northernmost boundary is Alondra Boulevard until it enters the City of Compton at Haskins Avenue. The majority of the city is located south of State Route 91. The southern boundary generally follows Lomita Boulevard, while the eastern boundary follows portions of Central Avenue, Wilmington Avenue, Interstate 710, Santa Fe Avenue and just west of the Union Pacific Railroad lines. The unincorporated areas north of Alondra Boulevard and east of S Wilmington Avenue constitute the City's spheres of influence.

I.1 City History Synopsis

Native Americans like the Tongva (also referred to as Kizh or Gabrielino) established villages in the Carson area 6,000 years before the first white men arrived on the shores of southern California. In 1782, the first white settler of the area, Juan Jose Dominguez, was rewarded 75,000 acres of land by the Spanish governor of California. The land, known as Rancho San Pedro, included the current cities of Carson, Torrance, Redondo Beach, and the Los Angeles Harbor. The area was primarily used for cattle ranching, sheep grazing and dairy farming by settlers throughout the 19th century. The area was also the site of a notable battle during the Mexican-American War.

The shift from primarily rural to urban land use in the area that is now Carson occurred during the turn of the 20th century. The establishment of the Dominguez Water Company in 1911 allowed for the provision of water and other utilities, fostering residential and commercial settlement along Carson Street and Avalon Boulevard. More industrial and residential development followed the discovery of oil during the 1920s. The area continued to develop throughout the 20th century, facilitated by the extension of the interstate highway system into the South Bay and suburbanization of the Los Angeles metropolitan region.

The 1960s were a particularly important decade for Carson. The population boomed from about 40,000 residents in 1960 to about 70,000 at the end of the decade. During this period, the area remained unincorporated territory of Los Angeles County. This status led to the concentration of industrial and pollutive uses in the area, like refuse dumps, landfills and automobile dismantling plants. In 1968, residents of the area voted to incorporate Carson into a city as a means of establishing greater control over their community and its land uses.

Since incorporation Carson has continued to grow. Recently, Carson has seen a population increase of 10.8 percent between 1990 and 2020, indicating that the city is below the overall trend of Los Angeles County (14.8 percent) according to SCAG Pre-certified Local Housing Data for the City of Carson and the California Department of Finance (DoF). It has a housing stock typical to a mid-sized urban city in the County, with an average household size of 3.62 in 2019 and 78.43 percent single-family households in 2020. Over the 2000-2020 period, there has been a net increase of 225 housing units. The number of multifamily housing units increased by about 14 percent during the period, while single-family housing units decreased by about 0.8 percent.

1.2 Purpose of the Housing Element

As part of a jurisdiction's General Plan, California state law requires the adoption of a Housing Element to identify and address the community's housing needs. Unlike the General Plan, however, the Housing Element must be updated every eight years to reflect changing conditions, community objectives, and goals. The 2021-2029 Housing Element for the City of Carson coincides with the City's 2040 General Plan Update and will set forth the City's housing priorities and goals, as well as its vision for both short- and long-term development. The Housing Element also identifies specific housing strategies and programs in the Housing Action Plan (Chapter 6) to address the community's housing needs. Housing goals include:

1. Maintain and rehabilitate Carson's existing housing stock.
2. Encourage the development of a variety of housing to meet needs of the broad spectrum of the community, with a particular emphasis on multifamily housing, and development standards that facilitate housing production.
3. Preserve affordable housing "at risk" of conversion and promote additional affordable housing development.
4. Promote and preserve housing opportunities for persons with special needs, including lower-income households, large families, single parent households, disabled persons, the elderly, and persons experiencing homelessness.
5. Housing opportunities to all persons regardless of race, religion, ethnicity, ability, sex, age, marital status, household composition, or other arbitrary factor.
6. Conserve natural resources and reduce energy consumption in all areas of residential development.

Further, it provides an evaluation of the adopted 2014-2021 Housing Element, including an assessment of prior programs and strategies.

CALIFORNIA STATE HOUSING ELEMENT LAW

State law requires all jurisdictions to adopt a General Plan composed of at least seven elements, including the Housing Element, and cities with disadvantaged communities need to incorporate environmental justice into the General Plan. California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for Housing Elements. California Government Code Sections 65580-65589 detail the specific regulations that Housing Elements must follow, including the provision that local governments must review and revise their Housing Elements on an eight-year cycle. The current Housing Element constitutes the 2021-2029 Housing

Element cycle. While Housing Elements must be updated every eight years, the other General Plan elements typically cover a 10- to 20-year period.

While the Housing Element is shaped by State law, it is essentially a local document. The Carson Housing Element, in tandem with the comprehensive 2040 General Plan Update, is designed to assess and shape the community's housing progress and needs. The document must adhere to State law requirements and is subject to mandatory review by the State of California Department of Housing and Community Development (HCD).

Carson's Housing Element was last updated in 2014 and covered the years 2014-2021. The current Housing Element is updated to reflect the Regional Housing Needs Assessment (RHNA) as determined by the Southern California Association of Governments (SCAG) for the Sixth Cycle Housing Element Update, covering the years 2021-2029. The Element sets forth a strategy to address the City's identified housing needs, including specific implementing programs and activities.

Various amendments have been made to Housing Element law since adoption of the City's current Housing Element, especially since 2017. These include, but are not limited to:

- AB 686: Requires the City to affirmatively further fair housing in identifying specific plans and programs, as well as an assessment of fair housing practices and impediments.
- AB 1397 and SB 166: Requires that sites listed on the housing site inventory must be both available and suitable for residential development in compliance with "no net loss" provisions. Importantly, these bills introduce limitations on the continued inclusion of both vacant and non-vacant sites identified in prior housing elements.
- AB 1763, AB 2345, AB 2753, AB 2372 and SB 1227: Provides enhanced density bonus incentives under the State Density Bonus law.
- AB 881, AB 68, SB 13, AB 671 and AB 3182: Provides further incentives for and streamlines the production of accessory dwelling units (ADUs).
- AB 671, AB 1255, AB 1486 and SB 6: Requires the City to prepare a list of surplus lands under its ownership and provide a description of non-vacant sites owned by the City, including whether there are any plans to dispose of the property during the planning period.
- SB 167, AB 678, AB 1515 and SB 330: Strengthens the Housing Accountability Act (HAA) and limits the ability of jurisdictions to deny or make infeasible qualifying housing projects. Importantly, the City may not decrease housing capacity if such a decrease would prevent the City from meeting its RHNA target and violate "no net less" provisions. The City must also establish objective development standards.

The contents of this updated Housing Element comply with these amendments and all other requirements of Housing Element law.

ENVIRONMENTAL REVIEW

The Housing Element Update is considered a General Plan Amendment and is therefore subject to the California Environmental Quality Act (CEQA). The Housing Element Update is happening concurrently with the Carson 2040 General Plan Update, as such, the environmental impacts for both will be examined at the same time under a Program EIR.

1.3 Organization of the Housing Element

The Housing Element is divided into several chapters and appendices covering the assessment of current conditions, housing needs, constraints, and the housing plan. It is organized as follows:

- **Chapter 1 – Introduction:** Provides an introduction to the document, including City background and the purpose of a Housing Element.
- **Chapter 2 – Housing Needs Assessment:** Presents community demographic information, including both population and household data. Outlines the Regional Housing Needs Assessment (RHNA) process and provides an assessment of housing needs.
- **Chapter 3 – Affirmatively Furthering Fair Housing:** Provides an assessment of fair housing issues and efforts in Carson.
- **Chapter 4 – Housing Constraints:** Explores the various obstacles the City faces in developing housing – including governmental and non-governmental constraints.
- **Chapter 5 – Housing Resources:** Analyzes site, financial, and administrative availability for future housing development.
- **Chapter 6 – Housing Action Plan:** Institutes the goals, policies, and programs of the 2021-2029 Housing Element, and provides quantified objectives.
- **Appendix A – Public Outreach Materials**
- **Appendix B – State Licensed Residential Care Facilities – City of Carson**
- **Appendix C – Sites Inventory**
- **Appendix D – Prior Housing Element Evaluation**
- **Appendix E – 2020 Analysis of Impediments to Fair Housing Choice – City of Carson**

1.4 Relationship to Other General Plan Elements

A comprehensive update of Carson’s General Plan, which was last updated in 2004, has been undertaken together with the Housing Element. The 2040 General Plan provides the framework for development of facilities, services and land uses necessary to address the needs and desires of City residents, workers, and businesses. To ensure that these needs are clearly addressed throughout the General Plan, the elements must be interrelated and interdependent.

The Housing Element is affected by development policies contained in the Land Use Element, which establishes the location, type, intensity and distribution of land uses throughout the City, and defines the land use build-out potential. In designating residential development, the Land Use Element places both minimum and maximum limits on housing units allowed on various sites. The acreage designated for a range of commercial and office uses creates employment opportunities for

various income groups. The presence and potential for jobs affects the current and future demand for housing at the various income levels in the City.

The Circulation Element of the General Plan also affects the implementation of the Housing Element. The Circulation Element establishes policies for a balanced circulation system in the City. Consequently, the Housing Element must include policies that take into account the types of infrastructure essential for residential housing units in addition to mitigating the effects of growth in the City. The Environmental Justice Element further policies to ensure that growth is balanced, inclusive, and just.

The Housing Element Update builds upon and is consistent with these and other General Plan elements.

1.5 Public Participation

Section 65583 (c)(6)(B) of the Government Code states that, “The local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” City residents will have several opportunities to recommend strategies, review, and comment on the Carson Housing Element as discussed below.

The City convened a stakeholder meeting on June 16th, 2021 to solicit input on the Housing Element. Participants included those interested in housing development and preservation in the city, including both non-profit and for-profit developers who have experience constructing both market-rate and affordable housing in Carson. Discussion was focused on housing priorities, housing needs and constraints, and opportunities and solutions. An additional stakeholder meeting was scheduled for June 24th, but postponed due to low stakeholder availability.

Public hearings are held annually on the City's participation in the Community Development Block Grant (CDBG) program. Housing rehabilitation and fair housing needs are a major expenditure in the Block Grant program, and projects are reviewed for consistency with the General Plan, including this Housing Element. Additionally, each year the Planning Commission and City Council annually conduct a public review of progress made in implementing the programs set forth in the Housing Element as part of the Annual Report prepared in accordance with Section 65400 of the California Government Code.

The Housing Action Plan reflects community input gathered between 2017 and 2020 for an array of City initiatives, including the preparation of an Analysis of Impediments to Fair Housing Choice, Community Development Block Grant (CDBG) Annual Action Plans, the 2020-2024 Five-Year Consolidated Plan, and the 2040 General Plan Update. Meetings were also held specifically on the 2021-2029 Housing Element Update in 2021.

1.6 Sources of Information

In preparing the Housing Element, various sources of information were consulted. The sixth cycle housing element SCAG-developed and HCD-pre-certified local data package provide the basis for population and household characteristics. However, this data relies in part on now superseded 2014-2018 American Community Survey (ACS) 5-year and 2012-2016 HUD Comprehensive Housing Affordability Strategy (CHAS) estimates, and occasionally does not provide the full scope of community characteristics. Where necessary, several additional and more current sources are used to provide reliable updates of the SCAG data package. The sources used in the SCAG data package and any additional sources are listed below.

1. SCAG Pre-Certified Local Housing Data, 2020
 - a. American Community Survey (ACS), 2014-2018 5-year estimates
 - b. California Department of Finance (DoF), E-5 Population and Housing Unit Estimates, 2010-2020
 - c. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2012-2016
 - d. California Department of Developmental Services, June 2019
 - e. Southern California Association of Governments (SCAG) Local Profiles [including Construction Industry Research Board (CIRB) and Core Logic/DataQuick], 2019
 - f. California Housing Partnership, 2020
2. SCAG 6th Cycle Final Regional Housing Needs Assessment Plan, 2021
3. SCAG Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Report), 2020
4. U.S. Census Bureau, Decennial Census, 2000 and 2010
5. U.S. Census Bureau, ACS, 2006-2010 and 2015-2019 5-year estimates
6. U.S. Census Bureau, OnTheMap LEHD Origin-Destination Employment Statistics, 2018
7. HUD, CHAS, 2013-2017
8. HUD, Multifamily Assistance & Section 8 Database, July 29, 2021
9. HUD, Affirmatively Furthering Fair Housing (AFFH) Data Release, Table 12 AFFHT0006, July 2020
10. Integrated Public Use Microdata Series (IPUMS) National Historical Geographic Information System (NHGIS), University of Minnesota, 1990
11. IPUMS USA, University of Minnesota, 2015-2019
12. HCD State Income Limits, 2020
13. HCD AFFH Data and Mapping Resources, 2021
 - a. ACS, 2010-2014 5-year estimates
 - b. ACS, 2015-2019 5-year estimates
 - c. HUD, Low- to Moderate-Income Population, FY 2021
 - d. HUD, Jobs Proximity, 2014-2017
 - e. Urban Displacement Project, 2019
 - f. California Tax Credit Allocation Committee (TCAC) and HCD Opportunity Areas Mapping Analysis, 2021
 - g. California Health and Human Services Agency (CHHS), January 2020
14. TCAC, Project Staff Reports, 2015-2019

15. Federal Home Mortgage Disclosure Act data, 2012-2019
16. County of Los Angeles Utility Allowance Schedule, 2020
17. Compton Unified School District, 2021
18. Los Angeles Unified School District, 2021
19. City of Carson Housing Authority, Affordable Ownership Condominium Price Table, 2020
20. City of Carson Housing Authority, Annual Report, Fiscal Year (FY) 2019-2020
21. City of Carson, Finance Department, Uniform Comprehensive Schedule of Fees, 2019
22. City of Carson, GIS data, 2017
23. City of Carson, IDIF Program Fee Table, July 2021 to June 2022
24. City of Carson, Annual Progress Report, 2020
25. City of Long Beach, Annual Progress Report, 2020
26. Zillow Home Value Index (ZHVI), January 31, 2010 and January 31, 2021
27. California Housing Partnership, August 2021
28. GeoTracker, Landfill Sites, 2021

In addition to providing information on the citywide level, selected information is also provided at the census tract or block group to allow comparison among different areas in Carson. Comparisons are made to illustrate diversity within the City across geographic areas.

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2 Housing Needs Assessment

A successful strategy for improving housing conditions must be preceded by an assessment of the housing needs of the community and region. This chapter discusses the components of housing need – the trends in Carson’s population, households, and employment base and the type of housing available. Since these changes have not occurred in a vacuum, the regional context is also presented. The Housing Needs Assessment is presented in the following nine sections:

- Community Context
- Population Characteristics
- Household Characteristics
- Employment Characteristics
- Housing Stock Characteristics
- Special Needs
- Preservation of Assisted Housing at Risk of Conversion
- Energy Conservation
- Future Housing Needs

The assessment provided in each section can be used to help identify programs that are needed to ensure that the existing and future housing stock meets the housing needs of every segment of the city’s population. Analysis in each of these subsections informs the housing programs and policies provided in Chapter 6 of this Housing Element.

The Southern California Association of Governments (SCAG) produced Local Housing Data packages for jurisdictions in the SCAG region that have been pre-approved by the State Department of Housing and Community Development (HCD). However, much of the data relies on now outdated 2014-2018 5-year American Community Survey (ACS) and 2012-2016 Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) estimates. Thus, where applicable, this chapter uses the more current 2015-2019 5-year ACS and 2013-2017 HUD CHAS estimates as opposed to the SCAG data package. Where the SCAG data package provides the most current data, this is used for analysis. In addition, alternate sources are used where the SCAG data package does not provide sufficient information. Where the SCAG data package provides the most current data, this is used for analysis.

2.1 Community Context

Carson is located in the central portion of southern Los Angeles County. The city is bordered by East Alondra Boulevard and the City of Compton on the north, the City of Long Beach on the east, the Los Angeles neighborhood of Wilmington on the south, and the I-110 on the west. The city is also located about 10 miles south of downtown Los Angeles and three miles north of the Ports of Los Angeles and Long Beach. Carson is connected to the greater Los Angeles area by public transportation – like the Los Angeles Metro A Line (formerly the Blue Line) – and a number of major freeways, including the I-110, SR-91 and I-710. The regional and local settings are depicted in Figures 2-1 and 2-2, respectively.

Residents of Carson voted to incorporate as a city in 1968 in order to exert greater control over land uses in their community. Prior to incorporation, the area now known as Carson was the site of major oil refineries, as well as other industrial and residential uses. Many of these uses have continued into the present era. The area experienced a population boom between 1960 and 1970 due largely to the extension of the interstate highway system. The city has continued to grow since, and most development that exists now had already been built by 1981. As of 2021, the most prominent land designation in the city is for industrial uses (42.3 percent) with residential use second largest (28.2 percent).

The City of Carson is preparing an update of its General Plan, which will establish the City's overall approach to development, transportation, environmental quality, and other key topics through 2040. The City's current General Plan dates to 2004, and needs to be updated to reflect the opportunities, challenges, and approaches that have emerged in recent years. The Update is being prepared in parallel with this Housing Element and helps to inform the findings of this housing needs assessment.

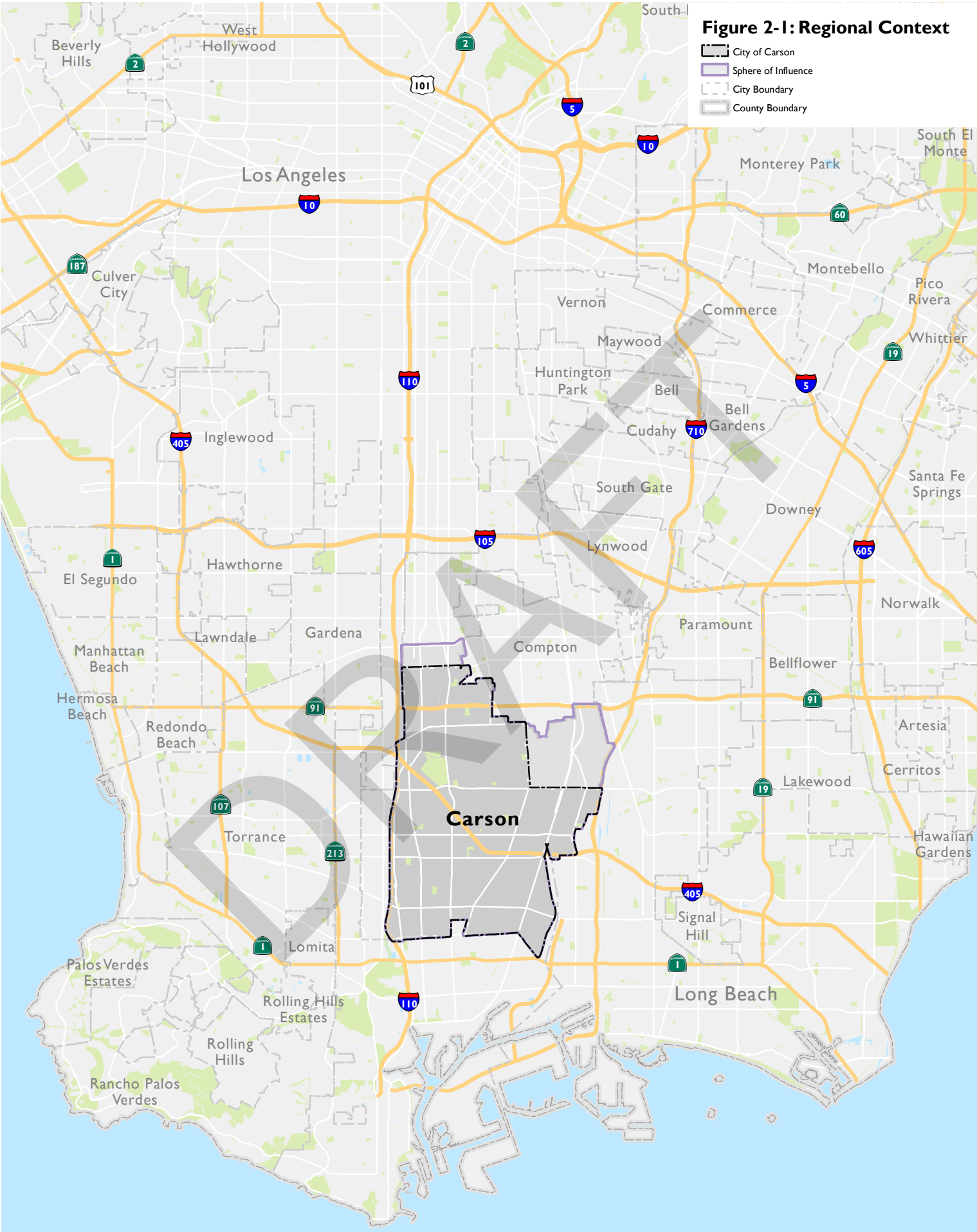
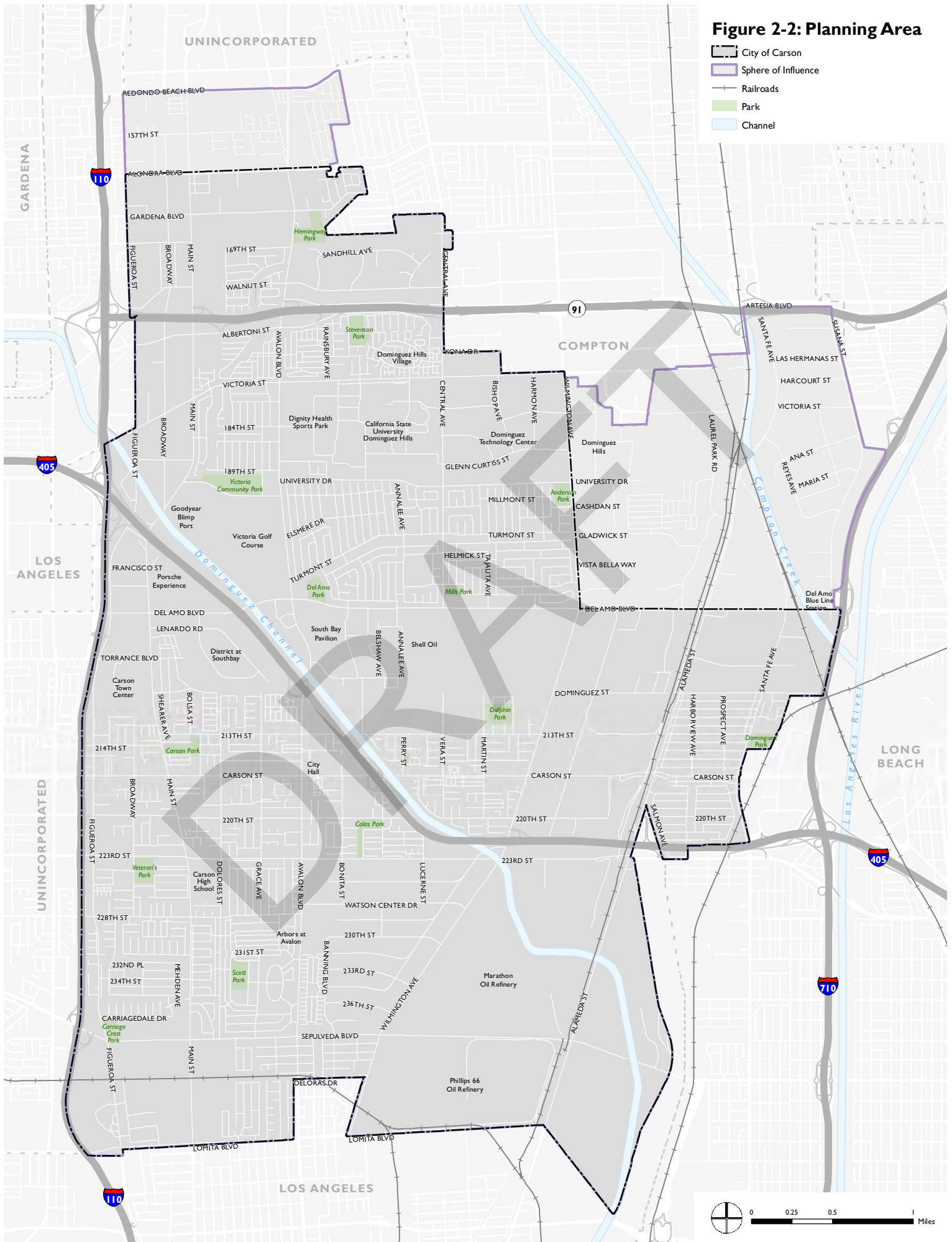


Figure 2-2: Planning Area



2.2 Population Characteristics

The 2020 population of Carson was estimated by the California Department of Finance (DOF) to be 93,108 persons. Per DOF, the population paralleled statewide trends in 2021, as it continued to decrease to 91,668 persons. The 2020 estimates are used throughout this assessment to maintain consistency with the SCAG data package and other data sources. As illustrated in Table 2-1, Carson experienced a 10.8 percent increase in population between 1990 and 2020, while Los Angeles County experienced the higher 14.8 percent. Further, Carson's population changes suggest a trend of gradually slowing rate of growth.

Table 2-1: City of Carson and Los Angeles County Historic Population Change

	Year	Carson	Los Angeles County
Population	1990	83,995	8,863,164
	2000	89,730	9,519,330
	2010	91,714	9,818,605
	2020	93,108	10,172,951
Percent Change	1990-2000	6.80%	7.40%
	2000-2010	2.20%	3.10%
	2010-2020	1.50%	3.60%
	1990-2020	10.80%	14.80%

Source: IPUMS NHGIS, 1990; SCAG Local Housing Data (California Department of Finance E-5 Population and Housing Unit Estimates)

The SCAG 2020 Connect SoCal Demographics and Growth Forecast growth projections for the City of Carson, Los Angeles County and surrounding cities are presented in Table 2-2. The highest growth rates over the 45-year period from 2000 to 2045 are projected for the entire SCAG region at 36.3 percent, Los Angeles County at 22.6 percent, and the City of Carson at 17.2 percent. Long Beach, Compton and Torrance have lower projected growth rates.

Table 2-2: City of Carson and Los Angeles County Population Trends, 2000-2045

Jurisdiction	2000	2010	2020	2045 Population (Projected)	2000 – 2045 Percent Change (Projected)
Carson	89,730	91,714	93,108	105,200	17.2%
Compton	93,493	96,455	98,032	103,100	10.3%
Long Beach	461,522	462,257	472,217	489,600	6.1%
Torrance	137,946	145,438	145,546	153,100	11.0%
Los Angeles County	9,519,330	9,818,605	10,172,951	11,673,600	22.6%
SCAG Region	16,516,703	18,051,534	19,021,787	22,504,100	36.3%

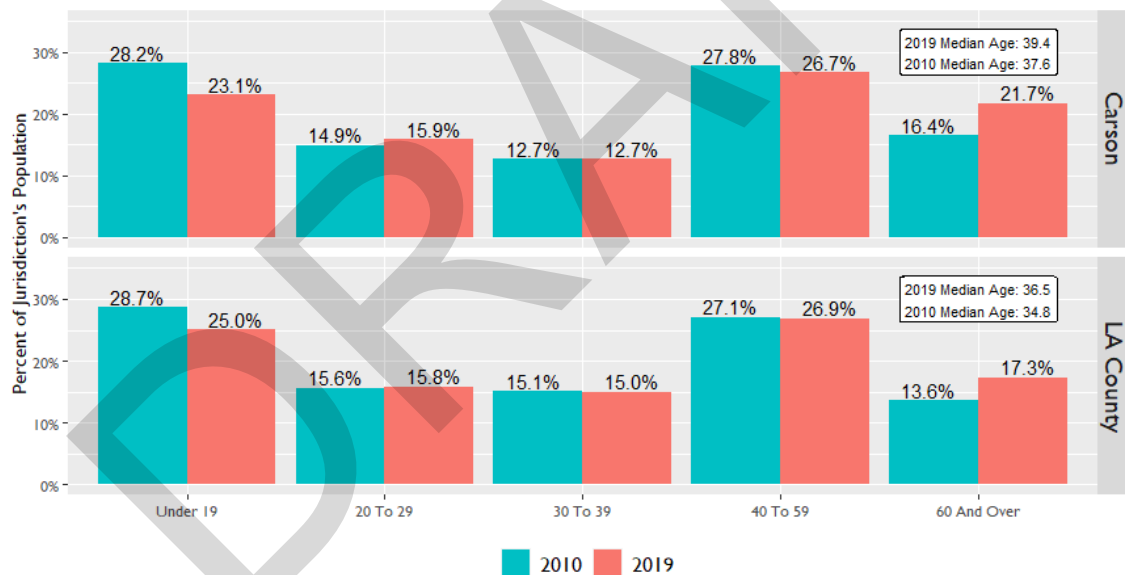
Sources: 2000 – 2020 Population: SCAG Local Housing Data (California Department of Finance E-5 Population and Housing Unit Estimates); 2045 Population: SCAG 2020 Connect SoCal Demographics and Growth Forecast

AGE CHARACTERISTICS

The age characteristics of residents in large part shape the housing needs of a community. For example, younger adult residents may desire smaller and more affordable apartments or similar housing, while families may desire larger single-family detached or attached homes. Group quarters may be suited for seniors or college students.

With the increase in the city's population over the previous decade, there has been a measurable increase in the age of the city's population. The median age in Carson rose during this time period from 37.6 to 39.4 years of age (see Chart 2-1). From 2010 to 2019, the number of residents aged 60 years or older generally increased. The growing elderly population in Carson is consistent with a nationwide trend toward a growing elderly population. Senior residents in Carson constituted a higher proportion of the overall population than in the county. Notably, the proportion of young adults in the city saw a greater increase than the equivalent cohort in the county, specifically for residents in the 20 to 29 years of age range. This likely reflects the presence of California State University Dominguez Hills in the city and the students that it attracts.

Chart 2-1: City of Carson and Los Angeles County Age Distribution, 2010 - 2019



Source: U.S. Dept. of Commerce, Bureau of the Census, 2010 Report and 2015-2019 American Community Survey

RACE/ETHNICITY CHARACTERISTICS

Table 2-3 presents the race and ethnic make-up of Carson residents in 2019. As this table shows, the city has a racially and ethnically diverse population. The largest racial/ethnic grouping among the city's residents is Hispanic/Latino (any race) at 37.3 percent, with Asian (alone) and Black or African American (alone) following at 26.3 percent and 23.5 percent respectively. Only 7 percent of Carson residents are white (alone), while 0.2 percent of the population were American Indian and Alaska Native (alone), and 2.6 percent were Native Hawaiian and Other Pacific Islander (alone).

Table 2-3: City of Carson and Los Angeles County Race and Ethnicity, 2019

Race/Ethnicity	City of Carson		Los Angeles County	
	Number	Percent	Number	Percent
Hispanic/Latino (any race)	34,376	37.3%	4,888,434	48.5%
Asian (alone)	24,176	26.3%	1,454,769	14.4%
Black or African American (alone)	21,624	23.5%	790,252	7.8%
White (alone)	6,462	7.0%	2,641,770	26.2%
American Indian and Alaska Native (alone)	226	0.2%	20,831	0.2%
Native Hawaiian and Other Pacific Islander (alone)	2,388	2.6%	24,597	0.2%
Two or more races (alone)	2,732	3.0%	228,504	2.3%
Some other race (alone)	95	0.1%	32,413	0.3%
Total	92,079	100.0%	10,081,570	100.0%

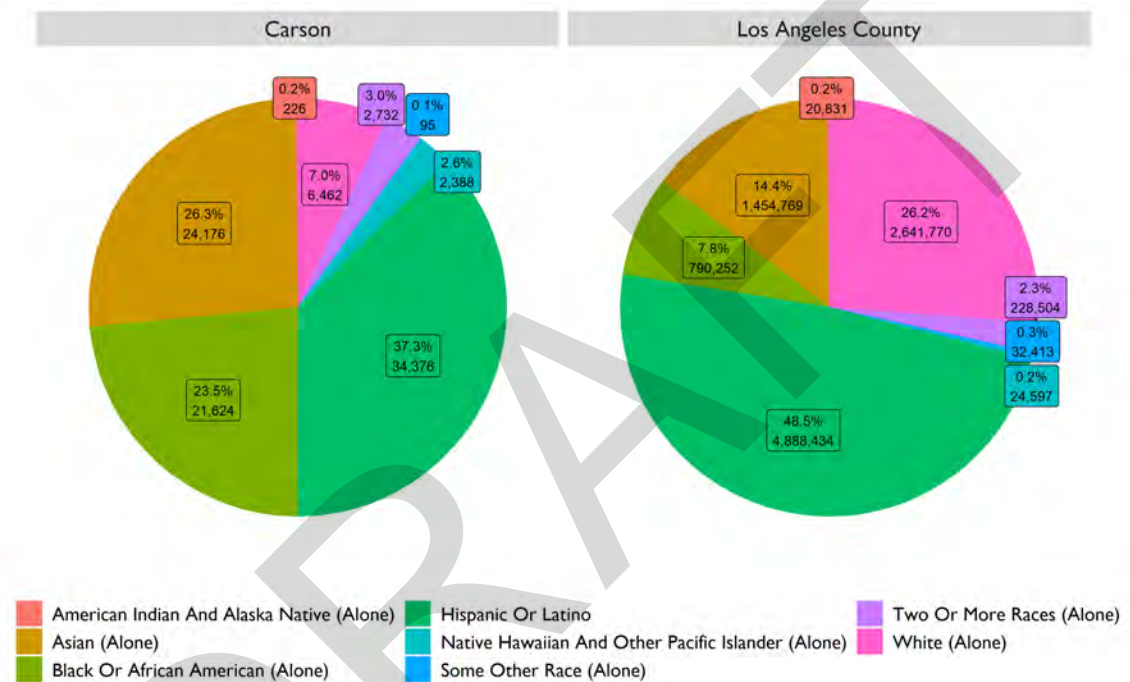
Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

According to the 2010 Census, the racial/ethnic composition for the City of Carson was comprised of 38.6 percent Hispanic/Latino (any race), 7.7 percent white (alone), 23.3 percent Black or African American (alone), 25.2 percent Asian (alone), and 2.5 percent Native Hawaiian and Other Pacific Islander (alone). Compared to the 2010 Census, the 2019 American Community Survey indicates that there were decreases in the white (alone) and Hispanic/Latino (any race) populations, and an increase in the Asian (alone) population.

It should be noted that persons of Hispanic/Latino origin are a self-designated category separate from race. The Census treats race and ethnicity as separate and independent categories. This means that within the federal system everyone is classified as both a member of one of the race groups and as either Hispanic or non-Hispanic/Latino (which is an ethnicity). For the purposes of this Housing Element, only non-Hispanic/Latino race groupings and Hispanics/Latinos of any race are considered.

The city is relatively more diverse when compared with Los Angeles County. The racial/ethnic composition of the county in 2019 was 48.5 percent Hispanic/Latino (any race), 14.4 percent Asian (alone), 7.8 percent Black or African American (alone) and 26.2 percent white (alone). Thus, the city has relatively overrepresented Asian (alone) and Black or African American (alone) populations and relatively underrepresented white (alone) and Hispanic/Latino (any race) populations when compared to the county. Chart 2-2 provides a visualization of these proportions.

Chart 2-2: City of Carson and Los Angeles County Race and Ethnicity, 2019



Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

STUDENT POPULATION

Carson is home to California State University Dominguez Hills, a public university that is part of the California State University (CSU) system. According to the CSU, in fall 2020 there were 17,763 students enrolled on the Dominguez Hills campus, representing about 3.7 percent of total enrollment in the CSU system for that year. Further, the 2015-2019 American Community Survey estimates that there were 8,424 (9.1 percent) Carson residents enrolled in college or graduate school. This is a higher proportion than of the neighboring cities of Torrance (7.0 percent) and Compton (6.1 percent), but lower than that of Long Beach (9.8 percent).

CSU Dominguez Hills plans increase the student population by over 40 percent through 2040. This will necessitate an expansion of the university campus, which presents both an economic opportunity and a challenge. The expansion will continue to attract students and faculty to the city, which may influence overall population, housing and employment trends. Additional housing and amenities will be needed to provide for this population.

2.3 Household Characteristics

Household characteristics are important indicators of the type and size of housing needed in a city. The Bureau of the Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, and unrelated individuals living together. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households.

As shown in Table 2-4, there are proportionately more married-couple families in Carson (54.1 percent) than in Los Angeles County (45.1 percent). Carson also has a lower proportion of male householders with no spouse/partner present (12.6 percent) and a higher proportion of households with one or more people 65 years and over (40.7 percent) compared to Los Angeles County (19.3 percent and 28.1 percent, respectively). The proportion of female householders with no spouse/partner present is nearly equivalent across both jurisdictions.

HOUSEHOLD SIZE

Household size is an important indicator in identifying sources of population growth, as well as overcrowding in individual housing units. A city's average household size will increase over time if trends move toward larger families. In communities where the population is aging, the average household size may actually decline.

According to the Census, the average household size in Carson increased from 3.58 persons in 2000 to 3.62 persons in 2019 (see Table 2-5). In comparison, the average household size for Los Angeles County has remained relatively consistent from 2000 to 2019 at just below 3.0 persons per household. While owner-occupied units tend to have higher average sizes than renter-occupied ones in Los Angeles County, the opposite is true of Carson. The fact that the city's population is aging while household size remains relatively high indicates that overcrowding may be a problem, especially in renter-occupied units.

Table 2-4: Household Characteristics in Carson and Los Angeles County, 2019

	<i>Carson</i>		<i>Los Angeles County</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
Total Households	25,211	100.0%	3,316,795	100.0%
Total Family Households	20,501	81.3%	2,210,939	66.7%
Married-couple family	13,634	54.1%	1,495,658	45.1%
With own children of the householder under 18 years	5,162	20.5%	639,936	19.3%
Cohabiting couple household	1,217	4.8%	225,057	6.8%
With own children of the householder under 18 years	561	2.2%	86,802	2.6%
Male householder, no spouse/partner present	3,183	12.6%	640,636	19.3%

	Carson		Los Angeles County	
	Number	Percent	Number	Percent
With own children of the householder under 18 years	305	1.2%	40,974	1.2%
Householder living alone 65 years and over	1,442	5.7%	391,454	11.8%
	678	2.7%	97,099	2.9%
Female householder, no spouse/partner present	7,177	28.5%	955,444	28.8%
With own children of the householder under 18 years	1,289	5.1%	170,488	5.1%
Householder living alone 65 years and over	2,537	10.1%	459,850	13.9%
	1,674	6.6%	195,688	5.9%
Households with one or more people under 18 years	9,183	36.4%	1,094,289	33.0%
Households with one or more people 65 years and over	10,266	40.7%	930,438	28.1%
Average household size	3.62	-	2.99	-
Average family size	4.03	-	3.66	-

Source: U.S. Census Bureau, 2015-2019 American Community Survey

Table 2-5: City of Carson Average Household Size, 2000 - 2019

Tenure	Carson	Los Angeles County
2000		
Owner-Occupied	3.56	3.14
Renter-Occupied	3.67	2.84
Overall	3.59	2.98
2010		
Owner-Occupied	3.60	3.17
Renter-Occupied	3.72	2.79
Overall	3.63	2.97
2019		
Owner-Occupied	3.58	3.17
Renter-Occupied	3.73	2.83
Overall	3.62	2.99

Source: U.S. Dept. of Commerce, Bureau of the Census 2000 Report, and 2006-2010, 2015-2019 American Community Survey

TENURE BY HOUSEHOLD

Tenure, and the ratio between homeowner and renter households, can be affected by many factors including housing cost, housing type, housing availability, and job availability. From 2000 to 2019, generally, about three quarters of all households in the city owned their homes. In comparison less than half of all households in the county owned their homes for the same timeframe. In both regions, however, homeownership rates have decreased throughout the period. According to the 2019 American Community Survey, 73.1 percent of the households in the City of Carson owned their homes, as compared with 26.9 percent of the households that were renters (see Table 2-6).

Table 2-6: City of Carson Household Tenure, 2000 - 2019

Carson			Los Angeles County	
Tenure	Number	Percent	Number	Percent
2000				
Owners	19,205	77.9%	1,499,744	47.9%
Renters	5,443	22.1%	1,634,030	52.1%
2010				
Owners	18,982	76.2%	1,552,091	48.2%
Renters	5,921	23.8%	1,665,798	51.8%
2019				
Owners	18,440	73.1%	1,519,516	45.8%
Renters	6,771	26.9%	1,797,279	54.2%

Source: U.S. Dept. of Commerce, Bureau of the Census, 2000 Census Report and 2006-2010, 2015-2019 American Community Survey

OVERCROWDING

The Census defines overcrowded households as units with more than one (1) person per room, excluding bathrooms, kitchens, hallways, and porches. Severely overcrowded is defined as over 1.5 persons per room. The 2019 American Community Survey indicated that about 2,422 households (9.6 percent) in Carson were overcrowded. As shown in Table 2-7, overcrowding was a greater problem for renters, with 17.1 percent of renter households reporting some level of overcrowding (i.e., including both overcrowded and severely overcrowded households), as compared to 6.8 percent of owners. Renters were also more likely to be living in severely overcrowded conditions.

Table 2-7: City of Carson Overcrowding by Tenure¹, 2019

Tenure	Total Housing Units	Overcrowded Households		Severely Overcrowded Households	
		Number	Percent	Number	Percent
Owners	18,440	1,072	5.8%	191	1.0%
Renters	6,771	774	11.4%	385	5.7%

1. The Census defines overcrowded households as units with more than one (1) person per room, excluding bathrooms, kitchens, hallways, and porches. Severely overcrowded is identified as over 1.5 persons per room.

Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

The city's existing housing stock consists of primarily owner-occupied units that contain a greater number of bedrooms compared to the rental housing stock (Table 2-25). In 2019, about 35.7 percent of owner-occupied units and about 13.0 percent of rental units consisted of four bedrooms or more. Greater overcrowding conditions for renters compared to owners may reflect the need for larger units with a greater number of bedrooms within the rental housing stock.

INCOME

A major factor determining the ability of a household to obtain adequate housing is income. Table 2-8 shows that in 2019, the median household income in Carson was \$82,305. This was higher than the county median income of \$68,044. While Carson's median income was less than that of Torrance (\$93,492) it was significantly higher than the median incomes of surrounding cities including Compton (\$52,883) and Long Beach (\$63,017), as indicated in Table 2-8. The percent change in median income between 2010 and 2019 was about 20.3 percent for Carson, which lags behind the 22.7 percent increase at the county level as well as the increases in neighboring jurisdictions. The relatively large student population in Carson may be one factor in accounting for the lower rates of median income increases.

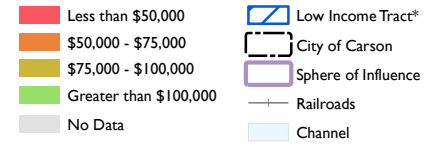
Table 2-8: City of Carson and Surrounding Areas Median Income, 2010 - 2019

Jurisdiction	2010 Median Income	2019 Median Income	Percent Change
Carson	\$68,425	\$82,305	20.3%
Torrance	\$74,163	\$93,492	26.1%
Compton	\$43,201	\$52,883	22.4%
Long Beach	\$51,173	\$63,017	23.1%
Los Angeles County	\$55,476	\$68,044	22.7%

Source: U.S. Dept. of Commerce, Bureau of the Census, 2006-2010 and 2015-2019 American Community Survey

Per the 2019 American Community Survey, there is a relatively even distribution of household income levels in Carson. Table 2-9 presents the number and percentage of households within the city that fall within a series of ten income ranges. About 27.3 percent of the city's households earn annual incomes up to \$49,999. At the opposite end of the spectrum, about 55.7 percent of Carson's households earned \$75,000 or more annually. Figure 2-3 shows median household incomes in the city by census tract.

Figure 2-3: Median Household Income



* As defined by HCD, the low income threshold is 80% of the Area Median Income (AMI). In 2020, the Los Angeles County AMI is \$77,300; 80% is \$61,840.

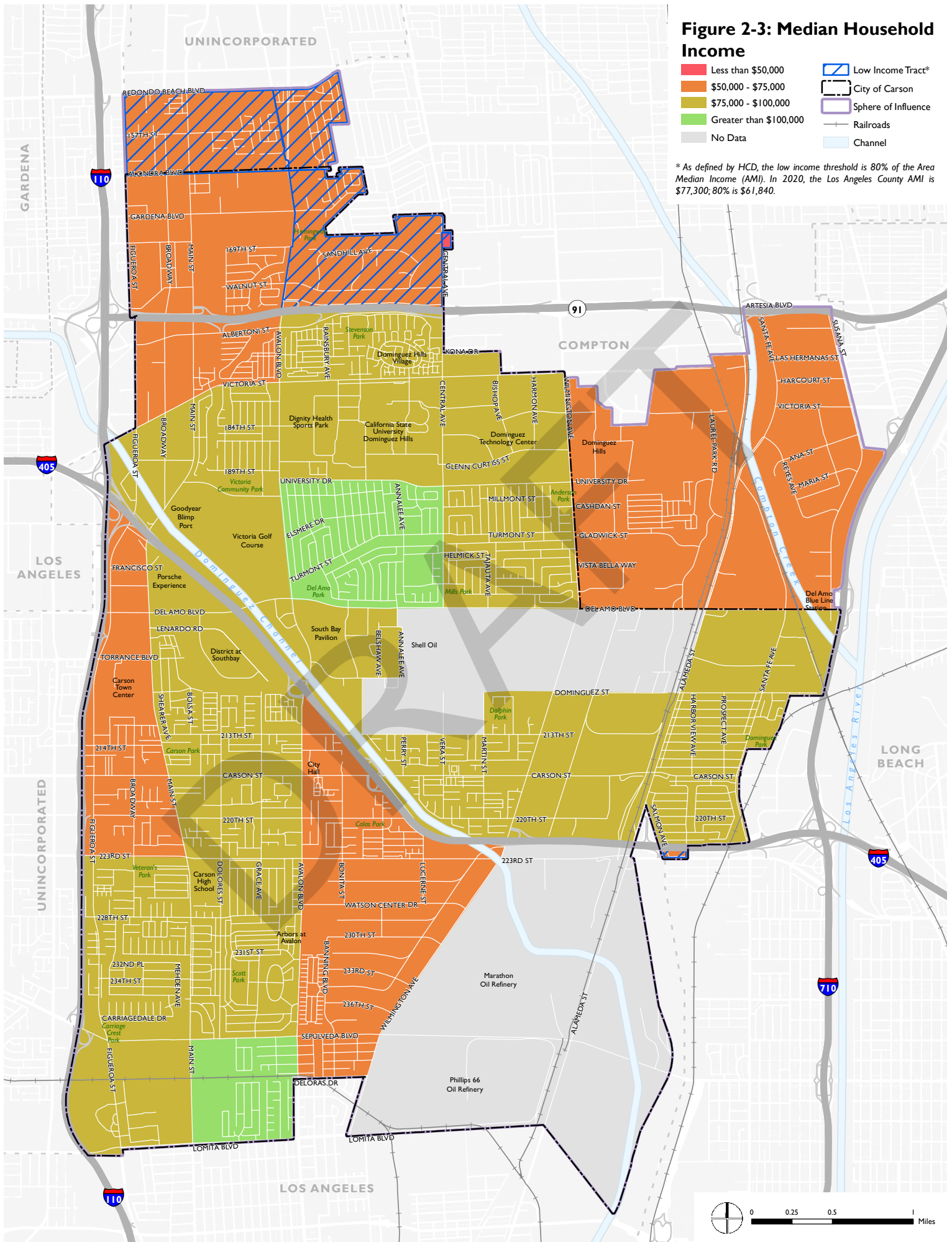


Table 2-9: City of Carson Household Income, 2019

<i>Income Range</i>	<i>Number of Households</i>	<i>Percent of Households</i>
Under \$10,000	756	3.0%
\$10,000 - \$14,999	958	3.8%
\$15,000 - \$24,999	1,336	5.3%
\$25,000 - \$34,999	1,513	6.0%
\$35,000 - \$49,999	2,319	9.2%
\$50,000 - \$74,999	4,286	17.0%
\$75,000 - \$99,999	3,882	15.4%
\$100,000 - \$149,999	5,370	21.3%
\$150,000 - \$199,999	2,546	10.1%
\$200,000 or more	2,244	8.9%
Total	25,211	100.0%

Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

The U.S. Department of Housing and Urban Development, and the State Department of Housing and Community Development, have developed the following income categories and their definitions:

- Very low-income - less than 50 percent of the county median income.
- Low-income - between 51 and 80 percent of the county median income.
- Moderate-income - between 81 and 120 percent of the county median income.
- Above moderate-income - greater than 120 percent of the county median income.

Carson's 2010 and 2019 income distributions can be divided into these four income groups through interpolation, as presented in Table 2-10. Comparing the city's income distribution in these two years provides insight into the changing income characteristics of the city's population. While very low- and moderate-income households decreased, low- and above moderate-income households increased over the period. There was an overall increase of 308 households during the period. The change in income distribution is likely due to several factors, including the increased county Area Median Income (AMI), the movement of moderate-income households into either the above moderate- or low-income categories, and the upward movement of very low-income households into the low-income category.

Table 2-10: City of Carson Income Groups¹, 2010 - 2019

<i>Income Level</i>	<i>2010 (Households)</i>		<i>2019 (Households)</i>		<i>Change 2000-2019</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
Very Low-Income (0% - 50% AMI)	4,751	19.1%	3,051	12.1%	-1,700	-35.8%
Low-Income (51% - 80% AMI)	2,823	11.3%	3,832	15.2%	1,009	35.7%
Moderate-Income	6,118	24.6%	4,286	17.0%	-1,832	-29.9%

Table 2-10: City of Carson Income Groups¹, 2010 - 2019

Income Level	2010 (Households)		2019 (Households)		Change 2000-2019	
	Number	Percent	Number	Percent	Number	Percent
(81% - 120% AMI)						
Above Moderate-Income	11,211	45.0%	14,043	55.7%	2,832	25.3%
(>120% AMI)						
Total	24,903	100.0%	25,211	100.0%	308	1.2%

1. Based on Los Angeles County 2010 Area Median Income of \$55,476 and 2019 Area Median Income of \$68,044.

Source: U.S. Dept. of Commerce, Bureau of the Census, 2010 Census Report and 2015-2019 American Community Survey

HOUSING COST BURDEN

State and federal standards for housing overpayment are based on an income-to-housing cost ratio of 30 percent and above. Households paying greater than 30 percent of their income have less income available for other necessities such as food, clothing, utilities, and health care. Households that spend 30 percent or more of gross income on housing costs are considered “cost burdened,” while those that spend 50 percent or more are considered “severely cost burdened.”

According to 2013-2017 HUD CHAS estimates, 8,710 (34.3 percent) Carson households are paying more than 30 percent of their income for housing. As shown in Table 2-11, an estimated 6,540 (59.2 percent) of Carson's lower-income households, those making 80 percent or less of the HUD Area Median Family Income (HAMFI), were experiencing cost burden. Further, about 32.4 percent of lower-income households were experiencing severe cost burden. About 3,260 (37.4 percent) of all cost burdened households are renter-occupied, while 5,450 (62.6 percent) are owner-occupied. Cost burden is generally greater for renters, as 50.4 percent of renters and 28.8 percent of owners faced some level of cost burden. Further, 70.2 percent of lower-income renters were cost-burdened compared with 52.7 percent of owners.

Table 2-11: City of Carson Cost-Burdened Households

Income Category ¹	Renters		Owners		Total Households	
	Number	Percent	Number	Percent	Number	Percent
Extremely Low-Income (Under 30% HAMFI²)						
No Cost Burden/Not Computed	255	16.8%	460	26.4%	715	21.9%
Cost Burden	260	17.1%	335	19.2%	595	18.2%
Severe Cost Burden	1,005	66.1%	950	54.4%	1,955	59.9%
Very Low-Income (30% - 50% HAMFI)						
No Cost Burden/Not Computed	230	19.2%	835	45.9%	1,065	35.3%
Cost Burden	555	46.3%	275	15.1%	830	27.5%
Severe Cost Burden	415	34.6%	710	39.0%	1,125	37.3%
Low-Income (50% - 80% HAMFI)						
No Cost Burden/Not Computed	750	53.0%	1,975	59.0%	2,725	57.2%
Cost Burden	540	38.2%	1,000	29.9%	1,540	32.4%

Income Category ¹	Renters		Owners		Total Households	
	Number	Percent	Number	Percent	Number	Percent
Severe Cost Burden	125	8.8%	370	11.1%	495	10.4%
All Lower-Income (Under 80% HAMFI)						
No Cost Burden/Not Computed	1,235	29.9%	3,270	47.3%	4,505	40.8%
Cost Burden	1,355	32.8%	1,610	23.3%	2,965	26.8%
Severe Cost Burden	1,545	37.4%	2,030	29.4%	3,575	32.4%
Moderate- and Above Moderate-Income (Over 80% HAMFI)						
No Cost Burden/Not Computed	1,970	84.5%	10,190	84.9%	12,160	84.9%
Cost Burden	315	13.5%	1,565	13.0%	1,880	13.1%
Severe Cost Burden	45	1.9%	245	2.0%	290	2.0%
All Incomes						
No Cost Burden/Not Computed	3,205	49.6%	13,460	71.2%	16,665	65.7%
Cost Burden	1,670	25.8%	3,175	16.8%	4,845	19.1%
Severe Cost Burden	1,590	24.6%	2,275	12.0%	3,865	15.2%
Total	6,465		18,910		25,375	

1. According to HUD, households spending 30 percent or less of their income on housing expenses have no cost burden, households spending 31 to 50 percent of their income have cost burden, and households spending 51 percent or more of their income have severe cost burden.

2. HUD Area Median Family Income (HAMFI).

Source: 2013-2017 HUD CHAS

2.4 Employment Characteristics

The 2015-2019 American Community Survey classified 47,785 persons living within Carson as being part of the labor force (this includes employed and unemployed persons aged 16 years and above). Of this total, 47,762 persons were in the civilian labor force with a total of 44,911 persons employed. According to the California Employment Development Department (EDD), the annual average unemployment rate in 2020 for Carson was 13.6 percent, while it was 12.8 percent for the county. These relatively high rates are likely the result of the COVID-19 economic crisis, as Carson saw the much lower unemployment rate of 6.3 percent in September 2017.

Industry sectors where Carson residents are employed reflect the presence of CSU Dominguez Hills and other educational institutions, major medical institutions in close proximity to the city, and the expansive industrial and warehousing uses in the community. In 2019, 27.2 percent of the city's employed residents were employed in educational services, health care and social assistance, and about 10.9 percent were employed in the manufacturing sector. The next largest employment industries in Carson were the professional, scientific, management, administrative, and waste management services sector at 10.1 percent followed by the retail trade sector at 9.6 percent. See Table 2-12 for the complete breakdown by industry.

Table 2-12: Carson Labor Force by Industry, 2019

<i>Industry</i>	<i>Number</i>	<i>Percent</i>
Agriculture, forestry, fishing and hunting, and mining	242	0.5%
Construction	2,405	5.4%
Manufacturing	4,903	10.9%
Wholesale trade	1,468	3.3%
Retail trade	4,291	9.6%
Transportation, warehousing, and utilities	3,591	8.0%
Information	907	2.0%
Finance and insurance, and real estate, and rental and leasing	2,158	4.8%
Professional, scientific, and management, and administrative, and waste management services	4,523	10.1%
Educational services, and health care and social assistance	12,202	27.2%
Arts, entertainment, and recreation, and accommodation and food services	4,082	9.1%
Other services, except public administration	2,075	4.6%
Public administration	2,064	4.6%
Total	44,911	100.0%

Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

Table 2-13 provides employment by occupation for the City of Carson, based on the 2015-2019 American Community Survey. Management, business, science, and arts occupations comprised 33.4 percent of the labor force. The next two highest occupational categories were sales and office occupations at 23.3 percent and service occupations at 19.7 percent.

Table 2-13: Carson Residents' Employment by Occupation, 2019

<i>Occupation</i>	<i>Number</i>	<i>Percent</i>
Management, business, science, and arts occupations	14,984	33.4%
Service occupations	8,830	19.7%
Sales and office occupations	10,483	23.3%
Natural resources, construction, and maintenance occupations	3,290	7.3%
Production, transportation, and material moving occupations	7,324	16.3%
Total	44,911	100.0%

Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

Another consideration of employment opportunities within the city is through the use of the "jobs-employed residents" ratio. The State Legislature established Government Code Section 65890.1, the intent of which is to encourage land use patterns which balance the location of employment-generating uses with residential uses. A balanced community would have a match between the number of employed residents and employment opportunities, enabling most residents to also work in the community. Per the 2040 General Plan, buildout calculations are projected to result in 106,500 jobs and a population of about 144,600 in 2040, which translates to a jobs-employed

residents ratio of 1.65, which is 7 percent less than the current ratio of 1.77 (Table 2-14). This implies that there is an abundance of jobs compared to employed residents of Carson, reflecting the city's role as an employment center in the region. While this imbalance is expected to decrease over the next few decades, Carson is likely to remain an employment hub.

Table 2-14: City of Carson Jobs to Employed Residents, Existing to 2040

	Existing ¹	Change	2040 Total ²	Percent Change
Total Population	98,900	46,000	144,900	47%
Employed Residents	43,900	22,200	66,100	51%
Jobs	77,600	31,500	109,100	41%
Jobs/Employed Residents	1.77	-	1.65	-7%

1. Population and jobs are rounded to the nearest 100. Population estimates are from 2020, while job estimates are from 2018.

2. Estimates are based on 2040 General Plan buildout projections.

Source: CA DOF E-5 Population and Housing Unit Estimates, 2020; U.S. Census Bureau, OnTheMap LEHD Origin-Destination Employment Statistics, 2018; Dyett & Bhatia, 2021

2.5 Housing Stock Characteristics

In order to determine the extent of housing need in the City of Carson, the analysis must also include the type of housing available. Housing need is defined as the difference between the type of housing required by the city's existing and projected population and the type of housing available. The size, price, and condition of existing units are the major factors in determining suitability. With a DOF estimated housing stock of 26,451 units in 2020, Carson represents a mid-sized community in Los Angeles County. During the 2010 to 2020 period, the number of housing units in Carson grew 0.9 percent, which was much lower than both the county and the SCAG region (see Table 2-15).

Table 2-15: City of Carson and Surrounding Areas Housing Growth, 2010 - 2020

Jurisdiction	2010 Housing Units	2020 Housing Units	2010 – 2020 Percent Change
Carson	26,226	26,451	0.9%
Torrance	58,377	58,591	0.4%
Compton	24,523	24,637	0.5%
Long Beach	176,032	177,783	1.0%
Los Angeles County	3,443,087	3,590,574	4.3%
SCAG Region	6,327,311	6,634,320	4.9%

Source: SCAG Local Housing Data (CA DOF E-5 Population and Housing Unit Estimates)

HOUSING TYPE AND TENURE

The city's 2020 housing stock is comprised of 78.4 percent single-family, 12.3 percent multifamily, and 9.3 percent mobile homes. During the 2010 to 2020 period, the city's multifamily housing stock increased by 14.0 percent while its single-family stock decreased by 0.8 percent (Table 2-16). The predominance of single-family homes is consistent with Carson's generally older adult population.

Table 2-16: City of Carson Household Type, 2010 - 2020

Housing Type	2010		2020		2010 – 2020 Percent Change
	Number	Percent	Number	Percent	
Mobile home	2,456	9.36%	2,456	9.29%	0.0%
Multifamily	2,852	10.87%	3,250	12.29%	14.0%
5+ units	2,164	8.25%	2,544	9.62%	17.6%
2-4 units	688	2.62%	706	2.67%	2.6%
Single-family	20,918	79.76%	20,745	78.43%	-0.8%
Attached	2,398	9.14%	2,404	9.09%	0.3%
Detached	18,520	70.62%	18,341	69.34%	-1.0%
Total	26,226	100.00%	26,451	100.00%	0.9%

Source: SCAG Local Housing Data (California Department of Finance E-5 Population and Housing Unit Estimates)

The tenure distribution of a community's housing stock (owner versus renter) influences several aspects of the local housing market, like residential mobility. Owner-occupied housing evidences a much lower turnover rate than rental housing. Housing overpayment, while faced by many households regardless of tenure, is far more prevalent among renters. Tenure preferences are primarily related to household income, composition, and the age of the householder.

The housing stock in Carson has historically been majority owner-occupied units, although the proportion of owner-occupied units has somewhat decreased in recent years. As seen in Table 2-6, the ratio of owner-occupied to renter-occupied units decreased slightly from 76.2 percent owners and 23.8 percent renters in 2010 to 73.1 percent owners and 26.9 percent renters in 2019. This is likely due to the construction of new apartment buildings in the city's core, as the 17.6 percent growth of 5+ unit multifamily housing during the 2010 to 2020 period shown in Table 2-16 suggests.

VACANCY RATE

According to the 2019 American Community Survey, the percentage of vacant housing units was 2.5 percent for Carson and 6.4 percent for Los Angeles County. In Carson, 4.7 percent of vacant units were for rent and 5.8 percent were for sale.

HOUSING CONDITIONS

The accepted standard for major housing rehabilitation needs is normally a 30-year timeframe. According to the 2015-2019 American Community Survey, about 90 percent of Carson's housing stock was 30 years or older in 2019 (i.e., built in or before 1989). This suggests that a number of Carson homes may need to be rehabilitated.

Precise quantifications of housing rehabilitation needs are difficult to estimate. Housing is considered substandard when physical conditions are determined to be below the minimum standards of living, as defined by Government Code Section 17920.3. A building is considered substandard if any of the following conditions exist:

- Inadequate sanitation
- Structural hazards
- Nuisances
- Faulty weather protection
- Fire, safety or health hazards
- Inadequate building materials
- Inadequate maintenance
- Inadequate exit facilities
- Hazardous wiring, plumbing or mechanical equipment
- Improper occupation for living, sleeping, cooking, or dining purposes
- Inadequate structural resistance to horizontal forces
- Any building not in compliance with Government Code Section 13143.2

Households living in substandard conditions are in need of housing assistance even if they are not actively seeking alternative housing arrangements. In addition to structural deficiency and standards, the lack of certain infrastructure and utilities often serves as an indicator of substandard conditions. According to the 2019 American Community Survey, as shown in Table 2-17, there were 61 housing units in the city lacking complete plumbing facilities and 70 housing units lacking complete kitchen facilities.

Table 2-17: City of Carson Plumbing and Kitchen Facilities by Tenure, 2019

	Owner		Renter	
	Number	Percent	Number	Percent
Plumbing				
Complete plumbing facilities	18,399	99.8%	6,751	99.7%
Lacking complete plumbing facilities	41	0.2%	20	0.3%
Kitchen				
Complete kitchen facilities	18,408	99.8%	6,733	99.4%
Lacking complete kitchen facilities	32	0.2%	38	0.6%

Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

HOUSING COSTS

The cost of housing determines whether or not a household will be able to obtain an adequately-sized unit in good condition in the area in which they wish to locate. Table 2-18 uses HCD's 2020 State Income Limits to estimate the maximum affordable mortgage payments and rents for households of various sizes in Carson. Affordable housing cost is based on a maximum of 30 percent (35 percent for moderate-income owners) of gross household income devoted to mortgage or rental costs. For instance, the maximum affordable sales price for a low-income household of four is \$308,131, while the maximum affordable rent for that same household would be \$2,043.

Table 2-18: City of Carson Housing Affordability by Income Group

		Affordable Monthly Payment ²		Housing Costs		Maximum Affordable Price	
Household Size	AMI Limits ¹	Renter	Owner	Utilities ³	Taxes & Insurance ⁴	Renter	Owner ⁵
Extremely Low-Income (<30% AMI)							
1 Person (Studio)	\$23,700	\$593	\$593	\$126	\$207	\$467	\$63,800
2 Person (1 Bedroom)	\$27,050	\$676	\$676	\$150	\$237	\$526	\$70,984
3 Person (2 Bedroom)	\$30,450	\$761	\$761	\$176	\$266	\$585	\$78,414
4 Person (3 Bedroom)	\$33,800	\$845	\$845	\$210	\$296	\$635	\$83,265
5 Person (4 Bedroom)	\$36,550	\$914	\$914	\$253	\$320	\$661	\$83,695
Very Low-Income (31%-50% AMI)							
1 Person (Studio)	\$39,450	\$986	\$986	\$126	\$345	\$861	\$126,617
2 Person (1 Bedroom)	\$45,050	\$1,126	\$1,126	\$150	\$394	\$976	\$142,951
3 Person	\$50,700	\$1,268	\$1,268	\$176	\$444	\$1,092	\$159,039

Table 2-18: City of Carson Housing Affordability by Income Group

		<i>Affordable Monthly Payment²</i>		<i>Housing Costs</i>		<i>Maximum Affordable Price</i>	
<i>Household Size</i>	<i>AMI Limits¹</i>	<i>Renter</i>	<i>Owner</i>	<i>Utilities³</i>	<i>Taxes & Insurance⁴</i>	<i>Renter</i>	<i>Owner⁵</i>
(2 Bedroom)							
4 Person (3 Bedroom)	\$56,300	\$1,408	\$1,408	\$210	\$493	\$1,198	\$173,040
5 Person (4 Bedroom)	\$60,850	\$1,521	\$1,521	\$253	\$532	\$1,268	\$180,838
Low-Income (51%-80% AMI)							
1 Person (Studio)	\$63,100	\$1,578	\$1,578	\$126	\$552	\$1,452	\$220,997
2 Person (1 Bedroom)	\$72,100	\$1,803	\$1,803	\$150	\$631	\$1,652	\$250,840
3 Person (2 Bedroom)	\$81,100	\$2,028	\$2,028	\$176	\$710	\$1,852	\$280,376
4 Person (3 Bedroom)	\$90,100	\$2,253	\$2,253	\$210	\$788	\$2,043	\$308,131
5 Person (4 Bedroom)	\$97,350	\$2,434	\$2,434	\$253	\$852	\$2,181	\$326,368
Moderate-Income (81%-120% AMI)							
1 Person (Studio)	\$64,900	\$1,623	\$1,893	\$126	\$663	\$1,497	\$271,206
2 Person (1 Bedroom)	\$74,200	\$1,855	\$2,164	\$150	\$757	\$1,705	\$308,724
3 Person (2 Bedroom)	\$83,500	\$2,088	\$2,435	\$176	\$852	\$1,912	\$345,690
4 Person (3 Bedroom)	\$92,750	\$2,319	\$2,705	\$210	\$947	\$2,109	\$380,272
5 Person (4 Bedroom)	\$100,150	\$2,504	\$2,921	\$253	\$1,022	\$2,251	\$404,302

Table 2-18: City of Carson Housing Affordability by Income Group

Household Size	AMI Limits ¹	Affordable Monthly Payment ²		Housing Costs		Maximum Affordable Price	
		Renter	Owner	Utilities ³	Taxes & Insurance ⁴	Renter	Owner ⁵

1. AMI limits based on 2020 HCD State Income Limits, other assumptions derived from City of Carson 2020 Affordable Ownership Condominium Price Table (City of Carson Housing Authority).

2. Affordable monthly payment for renters and owners is assumed to be one-twelfth of 30% of median income applicable for the number of bedrooms. The exception is moderate-income owners, whose affordable payment is assumed to be one-twelfth of 35% of median income applicable for the number of bedrooms as specified by HCD, pursuant to HSC 50052.5(b)(4).

3. Utilities are estimated according to the 2020 County of Los Angeles Utility Allowance Schedule. Estimates are based on the combined average cost of gas and electric heating, cooking and water heating, as well as basic electric, water, trash, air conditioning, refrigeration and range across multi- and single-family homes. Assumed equivalent for owners and renters.

4. Taxes and insurance are assumed to be 35% of monthly affordable housing costs for owners.

5. Assumed 30-year amortization, 3.17% interest rate, 3.5% down payment and closing costs equal to 2% of the sale price.

Source: HCD State Income Limits, 2020; County of Los Angeles Utility Allowance Schedule, 2020; City of Carson Housing Authority, 2020 Affordable Ownership Condominium Price Table; Dyett & Bhatia, 2021

Housing costs have seen a steady rise over the previous decade, reflected in higher median home values in Carson and other jurisdictions. As shown in Table 2-19, Carson's median home value in 2019 was \$462,600, which was about a 9.6 percent increase from 2010. Housing sales price data is also available from SCAG Core Logic/Data Quick estimates. Between 2010 and 2018 the median housing sales price in Carson increased by 68.9 percent, from \$305,000 to \$515,000. This estimate reflects the actual sale price of homes, while the Census-derived median home value represents the respondent's estimate of how much the property would sell for if it were for sale.

Table 2-19: City of Carson and Surrounding Areas Housing Values, 2010 - 2019

Jurisdiction	2010 Median Housing Value	2019 Median Housing Value	2010 – 2019 Percent Change
Carson	\$422,100	\$462,600	9.6%
Torrance	\$657,700	\$762,700	16.0%
Compton	\$330,100	\$355,200	7.6%
Long Beach	\$508,900	\$556,100	9.3%
Los Angeles County	\$508,800	\$583,200	14.6%
SCAG Region	\$417,050	\$466,650	11.9%

Source: U.S. Dept. of Commerce, Bureau of the Census, 2006-2010 and 2015-2019 American Community Survey

More detailed information on housing values in Carson can be tracked using Zillow's housing data. The Zillow Home Value Index (ZHVI) gives the "typical home value for the region," which is distinct from the "median home value." The ZHVI provides a smoothed, seasonally adjusted

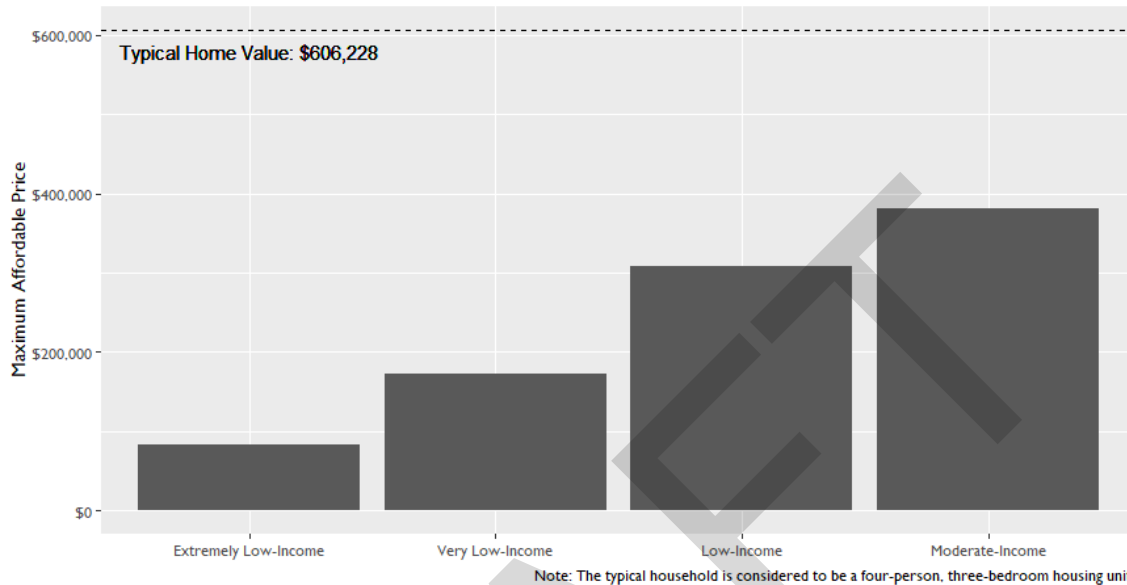
measure of the typical home value for homes in the 35th to 65th percentile range. Thus, while a useful measure of current market patterns in Carson, the ZHVI should not be used in direct comparison with median home values or median sales prices. Table 2-20 provides a breakdown of ZHVI metrics across different housing types within the city during the 2010 to 2021 period.

Table 2-20: City of Carson ZHVI, 2010 - 2021

<i>Housing Type</i>	<i>January 2010 ZHVI</i>	<i>January 2021 ZHVI</i>	<i>2010 – 2021 Percent Change</i>
Total	\$331,035	\$634,463	91.7%
Single-Family	\$338,707	\$643,804	90.1%
Condo	\$259,897	\$462,635	78.0%
1 Bedroom	\$162,655	\$286,701	76.3%
2 Bedroom	\$230,059	\$478,059	107.8%
3 Bedroom	\$320,894	\$606,228	88.9%
4 Bedroom	\$364,969	\$679,414	86.2%
5+ Bedrooms	\$395,350	\$715,644	81.0%

Source: Zillow Home Value Index, January 31, 2010 and January 31, 2021

When compared with affordability estimates from Table 2-18, it is apparent that the 2019 median housing value of \$462,600 is unaffordable for all income levels and household sizes. According to 2021 ZHVI estimates, a moderate-income four-person household would only be able to afford a one-bedroom unit (\$286,701). This demonstrates that there is an affordability gap in Carson, as homeownership at appropriate sizes and affordability levels is generally out of reach for Carson households. Per Chart 2-3, the typical household – a four-person, three-bedroom unit – cannot afford housing prices at any income level.

Chart 2-3: Homeownership Affordability Gap for the Typical Household

Source: Zillow Home Value Index, January 31, 2021; HCD State Income Limits, 2020; County of Los Angeles Utility Allowance Schedule, 2020; City of Carson Housing Authority, 2020 Affordable Ownership Condominium Price Table; Dyett & Bhatia, 2021

RENTAL HOUSING

In 2019, the median monthly rent in Carson was \$1,524. Table 2-21 illustrates that rents in Carson were generally higher than those of surrounding jurisdictions except Torrance. This may be in part due to the relatively small stock of rental housing compared to owner-occupied units in Carson.

Table 2-21: City of Carson and Surrounding Areas Monthly Rents: 2019

<i>Jurisdiction</i>	<i>2019 Median Monthly Rent</i>
Carson	\$1,524
Torrance	\$1,736
Compton	\$1,219
Long Beach	\$1,324
Los Angeles County	\$1,460
SCAG Region	\$1,418

Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

To better understand rental costs in Carson, U.S. Census microdata compiled by IPUMS USA can be used. IPUMS data corresponds to the Public Use Microdata Area (PUMA) for Carson, which does not necessarily have the same boundaries as other Census-derived estimates. Additionally, estimates are weighted by the representativeness of the sampled household given IPUMS-derived weights. Table 2-22 provides estimated median monthly gross rents in the city by the number of bedrooms using this data. Estimates of gross rent include additional expenses like utilities.

Table 2-22: City of Carson Monthly Rental Rates: 2019

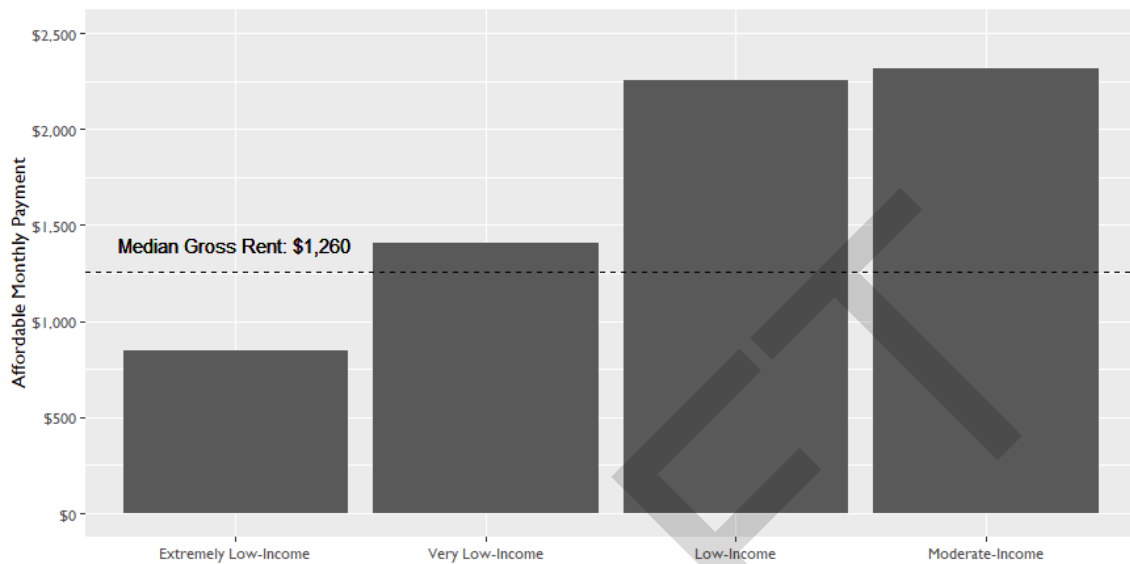
<i>Number of Bedrooms</i>	<i>Estimated Number of Households¹</i>	<i>2019 Median Monthly Gross Rent²</i>
0	881	-
1	577	\$1,000
2	1,906	\$1,265
3	7,925	\$1,260
4	13,389	\$1,797
5	7,275	\$2,235
6	1,411	\$2,323
7	13	-
8	36	-

1. Household count is based on the Public Use Microdata Area (PUMA) for Los Angeles County (South Central) – Carson City. While PUMAs generally follow the boundaries of census-defined “places,” total household counts may differ from other Census-derived estimates.

2. Estimates of median gross rent are weighted by an IPUMS-derived household weight.

Source: IPUMS USA, 2015-2019 ACS

Existing housing affordability in Carson can be determined by comparing the maximum affordable monthly payments (see Table 2-18) to median monthly rents for the typical household. The maximum affordable monthly payment, as opposed to maximum affordable price, should be considered in determining affordability since that estimate includes utility costs and is therefore a more appropriate comparison for median monthly gross rent. Considering these affordability estimates, rental rates in Carson are not affordable to the typical extremely low-income household in the city. The median monthly gross rent for a three-bedroom unit is \$1,260, while the maximum affordable monthly payment for the typical extremely low-income household is \$845. However, the typical very low-, low-, and moderate-income household would be able to afford the monthly gross rent of an appropriately sized unit. The maximum affordable monthly payment is \$1,408 for a very low-income household, \$2,253 for a low-income household, and \$2,319 for a moderate-income household. These all exceed the median monthly gross rent of \$1,260 for a three-bedroom unit. Chart 2-4 below demonstrates the rental affordability gap in Carson.

Chart 2-4: Rental Affordability Gap for the Typical Household

Source: Zillow Home Value Index, January 31, 2021; HCD State Income Limits, 2020; County of Los Angeles Utility Allowance Schedule, 2020; City of Carson Housing Authority, 2020 Affordable Ownership Condominium Price Table; Dyett & Bhatia, 2021

2.6 Special Needs

Certain segments of the population may have a more difficult time finding decent, affordable housing due to special circumstances. Such circumstances may be related to one's employment and income, family characteristics, disability, or other conditions. Thus, some residents may experience a higher prevalence of overpayment, overcrowding, or other housing problems.

State Housing Element law defines "special needs" groups to include persons with disabilities (including developmental disabilities), the elderly, large households, female-headed households, homeless people, and farmworkers. Many households within these special needs groups also fall within the extremely low-income category. The number of special-needs households and/or persons in Carson is summarized in Table 2-23.

Table 2-23: City of Carson Special Needs Groups

<i>Needs Group</i>	<i>Number of Households/Persons</i>	<i>Percent of Total Households/Persons¹</i>
Elderly Persons (65+)	15,397	16.7%
Persons with Disabilities ²	11,251	12.2%
<i>Independent Living</i>	4,945	5.4%
<i>Self-Care</i>	3,006	3.3%
<i>Ambulatory</i>	6,220	6.8%
<i>Cognitive</i>	4,413	4.8%
<i>Vision</i>	1,970	2.1%
<i>Hearing</i>	3,110	3.4%
Persons with Developmental Disabilities	2,520	2.7%
Extremely Low-Income Households (less than or equal to 30% HAMFI) ³	3,265	12.9%
Large Households (5 or more persons)	5,516	21.9%
Female-Headed Households	7,177	28.5%
Farmworkers ⁴	242	0.3%
Homeless Persons ⁵	386	0.4%

1. Based on City of Carson 2019 total population of 92,079 and 2019 total households of 25,211.

2. Since some disabilities are only recorded for populations above a certain age (e.g. 5 or 18), population percentages may not be accurate. As individuals may declare more than one disability, specific disability types should not be summed.

3. Percentage based on the 2013-2017 HUD CHAS estimate of 25,380 households.

4. Persons employed in Agriculture, forestry, fishing and hunting, and mining.

5. Includes both sheltered and unsheltered, based on 2019 point-in-time counts – total percentage may not be accurate.

Source: SCAG Local Housing Data (June 2019 CA DDS, 2019 city and county homelessness point-in-time counts); U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey; 2013-2017 HUD CHAS

Carson has been able to satisfy some of the needs of various special needs residents in the city through the licensing of group homes and other similar facilities that can accommodate special needs housing. For example, according to the California Department of Social Services (CDSS), there are 82 licensed or license pending Community Care Facilities in Carson as of March 2021. This includes group homes, small family homes, adult residential care centers, and elderly residential care centers. There are 57 licensed adult residential care facilities, of which 56 accommodate six or fewer adults. The only facility that accommodates more than six adults is the Olivia Isabel Manor adult residential care facility which accommodates 110 residents. There are, in addition, 18 residential care facilities for the elderly, 16 of which accommodate six or fewer adults, while the Carson Senior Assisted Living Facility which accommodates 230 residents and the Bayside Guest Home accommodates 10 residents. Finally, there is one small-family home in Carson, the Ugalde Small Family Home which accommodates one person. There are currently no

group homes in Carson. All of these types of facilities and their locations are included in Appendix B.

ELDERLY

The special needs of many elderly households result from their lower, fixed incomes, physical disabilities, and dependence needs. An estimated 15,397 elderly persons (65 years and over) resided in Carson in 2019, representing 16.7 percent of the total population. The proportion of elderly residents can be expected to increase as those persons in the middle age groups grow older. Escalating housing costs, particularly in the rental market, severely impact housing affordability for the elderly, who are usually on fixed incomes. In Carson, however, approximately 85 percent of elderly households own their homes while only 15 percent rent. According to the 2019 American Community Survey, in Carson there are 1,369 seniors, or about 8.9 percent of the elderly population, whose incomes fell below the poverty level.

PERSONS WITH DISABILITIES

Disabilities can hinder access to housing units of traditional design as well as limit the ability to earn adequate income. In 2019, approximately 12.2 percent of Carson's population reported having at least one of the six Census-defined disabilities. This includes hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Housing opportunities for persons with physical or other disabilities can be maximized through the provision of affordable, barrier-free housing. Special modifications include units with access ramps, wider doorways, assist bars in bathrooms, lower cabinets, elevators and the acceptance of service animals.

Persons with Developmental Disabilities

According to Section 4512 of the California Welfare and Institutions Code a “developmental disability” means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue indefinitely, and constitutes a substantial disability for that individual which includes intellectual disability, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with an intellectual disability but shall not include other handicapping conditions that are solely physical in nature.”

Many persons with developmental disabilities can live and work independently within a conventional housing environment. Individuals who have more severe developmental disabilities require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for persons with developmental disabilities is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

As of February 2021, the State Department of Developmental Services (DDS) provides community-based services to more than 330,000 persons with developmental disabilities and their families

through a statewide system of 21 regional centers, two state-operated developmental centers and one state-operated community facility. The Harbor Regional Center and the South Central Los Angeles Regional Center are the two regional centers currently providing point of entry services to people with developmental disabilities in the City of Carson. Table 2-24 provides information from DDS compiled by SCAG on the number of individuals with developmental disabilities in Carson. In June 2019, according to SCAG's estimates, there were approximately 2,520 individuals actively utilizing services provided by DDS.

Table 2-24: City of Carson Residents with Developmental Disabilities¹

	<i>Residents</i>
By Residence	
Home of Parent/Family/Guardian	764
Independent/Supported Living	30
Community Care Facility	188
Intermediate Care Facility	26
Foster/Family Home	30
Other	10
By Age	
0 – 17 Years	1,048
18+ Years	424
Total Residents	2,520

1. Total residents does not match as counts below 11 individuals are unavailable and some entries were not matched to a zip-code, necessitating approximation.

Source: SCAG Local Housing Data (June 2019 CA DDS)

LARGE HOUSEHOLDS

Large households are identified as a group with special housing needs based on the limited availability of adequately sized, affordable housing units. Large households are those with five or more members. Approximately 21.9 percent of Carson's households in 2019 had five or more members, about 5,516 households. This represents a slight decrease from 2010 when large households comprised 22.9 percent of the city's total households.

According to the 2019 American Community Survey, there is a disparity between the number of larger rental units and owner-occupied units available in the city. For example, as shown in Table 2-25, only about 13.0 percent of the city's rental units have four or more bedrooms while about 35.7 owner-occupied units do. The housing needs of large households can be addressed through the provision of new, affordably-priced larger units or the development of secondary units.

Table 2-25: City of Carson Housing Stock by Bedroom Mix, 2019

<i>Number of Bedrooms</i>	<i>Rental Units</i>	<i>Owner Units</i>	<i>Total</i>
0	78	104	182
1	1,092	320	1,412
2	2,332	3,235	5,567
3	2,392	8,193	10,585
4	705	5,610	6,315
5+	172	978	1,150
Total	6,771	18,440	25,211

Source: U.S. Dept. of Commerce, Bureau of the Census, 2015-2019 American Community Survey

FEMALE-HEADED HOUSEHOLDS

According to the U.S. Census Bureau, beginning with the 1980 Current Population Survey the terms “head of household” and “head of family” have been discontinued and replaced with the terms “householder” and “family householder.” Per the Census, “Recent social changes have resulted in greater sharing of household responsibilities among the adult members and, therefore, have made the term ‘head’ increasingly inappropriate in the analysis of household and family data.” To conform with Census definitions “female family households” and “male family households” will be use instead of “female-headed households” or “male-headed households.” A family household is one maintained by a householder within a family of two or more people and includes any other unrelated people who may be living there. A family household is one type of household as defined by the Census, and households may also include persons living alone or a group of unrelated people sharing a housing unit (i.e., nonfamily households).

Female householders generally tend to have lower incomes or may be subject to discrimination, thus limiting housing availability for this group. Providing housing opportunities for female family households particularly relates both to affordability and services related to the care of children, such as day care, schools, and recreational facilities. According to the 2019 American Community Survey, 7,177 family and nonfamily households (28.5 percent) in Carson had a female householder with no spouse/partner present, see Table 2-26. Of these, approximately 1,289 have dependent children under 18 years of age.

Further, there were 4,800 family households with a female householder, no spouse present. Approximately 2,297 (46.9 percent) of female family households contained at least on child under 18 years. Further, there were about 651 female family households living below the poverty line in 2019 (13.6 percent of female family households), 493 of which contained at least one child under the age of 18 years (21.5 percent of female family households with children). Per Table 2-26, the female family households living under the poverty level constituted nearly half of all family households living under the poverty level. Further, among female family households, about 64.2 percent of were owner-occupied while 35.8 percent were renter-occupied. According to the 2019 American Community Survey, this homeownership rate is lower than that of Carson households overall (73.1 percent). Higher relative poverty rates and lower homeownership rates for female family households likely reflect the fact that female-headed households are generally low-income.

Male householders make up 12.6 percent of all Carson households and constitute 0.9 percent of family households living under the poverty level.

Table 2-26: Female and Male Householders in Carson, 2019

Householder Type	Number	Percent ¹
Total households	25,211	100%
Female householder, no spouse/partner present	7,177	28.5%
With own children of the householder under 18 years	1,289	5.1%
Without children under 18 years	2,537	10.1%
Male householder, no spouse/partner present	3,183	12.6%
With own children of the householder under 18 years	305	1.2%
Without children under 18 years	1,442	5.7%
Total family households	20,501	100%
Total families under the poverty level	1,331	6.5%
Married-couple family households under the poverty level	503	2.5%
Female family households under the poverty level	651	3.2%
Male family households under the poverty level	177	0.9%

1. Householder proportions are considered out of total household count, while family household proportions are considered out of total family household count.

Source: U.S. Census Bureau, 2015-2019 American Community Survey

EXTREMELY LOW-INCOME HOUSEHOLDS

State law requires the quantification and analysis of existing and projected housing needs of extremely low-income households. These encompass households earning less than 30 percent of AMI, adjusted for household size. Given that the median income of Los Angeles County was \$68,044 in 2019, this implies extremely low-income households are those making \$20,413 or less for a four-person household annually. Projected housing needs for these households is assumed to be 50 percent of the very low-income region housing need of 1,770. Thus, there is a projected need for 885 extremely low-income housing units in the city during the 2021-2019 planning period.

Estimates from 2013-2017 CHAS data reported that Carson had a total of 1,520 renter households and 1,745 owner households that were extremely low-income (i.e., had a household income less than 30 percent of HAMFI). The combined total of 3,265 households represents about 12.9 percent of the city's households, compared to the CHAS-estimated 25,380 total households. Extremely low-income households represent the highest need group in terms of affordable housing as the greatest amounts of subsidies are needed to assist this group.

FARMWORKERS

The special housing needs of many farmworkers stem from their low wages and the insecure nature of their employment. While it can be difficult to estimate the number of farmworkers due to a lack of consistency of definitions across government agencies, the Census "agriculture, forestry, fishing

and hunting, and mining” industry provides one method of doing so. The 2019 American Community Survey identified 242 farmworkers living in Carson.

Seasonal farm work can also create unique housing challenges in a region, as many traditional affordable housing units cannot accommodate seasonal workers. While local data is not available, per the 2017 Census of Agriculture conducted by the U.S. Department of Agriculture (USDA), there were 1,517 seasonal (i.e., worked for less than 150 days) farmworkers on 238 farms and 1,749 permanent workers on 292 farms in Los Angeles County. Since Carson is located in the urban core of Los Angeles County, it is likely that few seasonal farmworkers live within the city. In Carson, like for other lower income individuals, the housing needs of farmworkers can be addressed through the provision of affordable housing opportunities.

PERSONS EXPERIENCING HOMELESSNESS

Throughout the country, and Los Angeles County in particular, homelessness is an increasing problem. Factors contributing to homelessness include the general lack of housing affordable to low- and moderate-income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidy to the poor, and the de-institutionalization of the mentally ill. The particular economic challenges instigated by the COVID-19 pandemic has exacerbated many of these previously existing conditions.

As of 2019, there were 386 unsheltered persons experiencing homelessness and 0 sheltered persons in Carson (Table 2-23). These estimates were derived from city and county homelessness point-in-time counts processed by SCAG.

The Los Angeles County Homeless Services Authority (LAHSA) is an independent joint powers authority created by the City of Los Angeles and Los Angeles County for the purpose of planning, coordinating, and managing resources for homeless programs. LAHSA is the lead agency for developing the HUD-funded Continuum of Care (CoC) strategy for the region to meet the needs for emergency shelters for homeless persons and to provide services and housing to transition homeless from emergency housing to transitional and permanent housing. For a variety of services, Los Angeles County is divided into eight Service Planning Areas (SPAs). LAHSA utilizes these SPAs in planning, coordinating, and managing resources for homeless programs. The City of Carson is located in SPA 8—South Bay. Throughout the COVID-19 public health emergency LAHSA has worked with key partners to establish and facilitate the “Project Roomkey” effort. Project Roomkey is a coordinated County-wide effort to secure hotel and motel rooms for people experiencing homelessness who are at a high-risk for hospitalization.

Parallel to LAHSA’s efforts and responsibilities as the lead agency in the County’s CoC, the Los Angeles County Board of Supervisors launched the Homeless Initiative in 2015. The Initiative identified key strategies to prevent and reduce homelessness in the County and received funding for those strategies with the passage of Measure H in 2017. Through coordination with a number of County departments, cities (including Carson), public agencies, and community partners and stakeholders, the Initiative identified 48 strategies to combat homelessness. These were condensed into the following six areas:

1. Prevent homelessness.
2. Subsidize housing.
3. Increase income.
4. Provide case management and services.
5. Create a coordinated care system.
6. Increase affordable/homeless housing.

The City obtained a planning grant from the county in 2017 to develop a comprehensive homelessness plan with the services of Shelter Partnership, Inc. In addition, the City has partnered with the South Bay Cities Council of Governments and the South Bay Coalition to End Homelessness on an application to the United Way of Los Angeles' Home for Good program.

Support services are also necessary to address the needs of homeless persons. Support services include case management, life skills, alcohol and drug abuse treatment, mental health treatment, AIDS-related treatment, education, employment assistance, childcare, transportation, housing placement, medical and dental care, and other services. Supportive services are accessed at all levels of the CoC. Generally, non-profit service providers target a particular community and population with appropriate social services. Services are accessed in different ways through various homeless programs. For example, job development programs are available to residents of housing programs or may be referred by case managers. Life skills training programs are typically accessed through residential programs offering case management services. Childcare services are often accessed through emergency and transitional shelters that sponsor on- and off-site childcare. Substance abuse programs often receive referrals from Drop-In Centers, Access Centers, LAHSA Emergency Response Team, the court system, Veterans Administration, health and mental health care systems, emergency shelters, transitional shelters and through self-referral. Most services are accessed directly through residential programs that offer these services, or by referral to an off-site program. Mental health services are also an important part of many transitional and permanent programs offered by non-profit providers of the CoC.

There are numerous homeless service providers that are part of the county's CoC. These service providers offer a range of services that extend beyond housing and shelter, including employment training, counseling, financial literacy, legal aid, childcare and transportation services. Homeless persons require special needs housing such as emergency shelters to meet their immediate needs and transitional housing to stabilize their lives and move them toward permanent housing. California Government Code Section 65662 requires that navigation centers for homeless persons transitioning to permanent housing be provided "by right" and CEQA-exempt approvals by local jurisdictions.

2.7 Preservation of Assisted Housing at Risk of Conversion

As required by Government Code Section 65583, the City must analyze the extent to which low-income, multifamily rental units are at risk of becoming market rate housing and, if necessary, develop programs to preserve or replace these assisted housing units. There are several low- to moderate-income housing projects in the city that have existing affordability controls, which are listed in Table 2-27. Further, the California Housing Partnership (CHP) has determined the risk level of units as of August 2021. While the CHP also provides unit estimates and affordability end year estimates, Table 2-27 uses local data provided by the Carson Housing Authority (CHA) or HUD's Multifamily Assistance & Section 8 Database if estimates differ. Affordability end years are based on project covenants and restrictions for CHA projects and the loan, contract, or regulatory agreement end date on HUD-assisted projects. The CHP risk levels are defined below.

- Low Risk – At-risk of converting to market rate in the next 10 or more years and/or are owned by a large/stable non-profit, mission-driven developer.
- Moderate Risk – At-risk of converting to market rate in the next five to 10 years.
- High Risk – At-risk of converting to market rate in the next one to five years.
- Very High Risk – At-risk of converting to market rate within the next year.

While the majority of assisted units are at a low risk of conversion, there are a number of units considered to be at moderate to very high risk. All projects assisted by the CHA are at low risk of conversion, while the two Section 8 based projects face some level of risk. The Carson Gardens Apartments contains 100 assisted units and is considered at moderate risk of conversion, since its Section 8 contract with HUD will expire in 2031. Grace Manor contains 30 assisted units and is considered at very high risk, since its Section 8 contract expires in 2021. However, according to contract renewal information provided by HUD's Multifamily Property/Contract/Rent & Utility Allowance Datasets, the Grace Manor project has a 12-month contract with HUD that, as of July 2021, was in the process of being renewed. Further, Grace Manor is owned by the Long Beach Affordable Housing Coalition (LBAHC), which is a non-profit Community Development Corporation (CDC). It is likely that the LBAHC will continue to maintain the project as affordable housing during the planning period.

Table 2-27: City of Carson Assisted Housing Inventory

Project	Affordable Units ¹				Total Units	Source of Funding ²	Affordability End Year	Risk Level
	ELI	VLI	LI	MI				
Via 425 - Phase I	0	7	39	18	65	CHA	2067	Low
Via 425 - Phase II	0	4	15	21	40	CHA	2070	Low
Arbor Green	0	4	18	17	40	CHA	2069	Low
Magnolia Walk	0	0	0	12	12	CHA	2058	Low
Villagio I and II	0	15	36	96	276	CHA	2040	Low
VEO	0	0	0	23	143	CHA	2059	Low
Carson City Center	0	9	51	25	86	CHA	2065	Low
Carson Terrace Apts.	0	30	0	30	61	CHA	2055	Low
Avalon Courtyard	0	46	45	0	92	CHA	2050	Low
Bella Vita (Affirmed Housing)	7	37	20	0	65	CHA	2073	Low
Veteran's Village	5	20	0	0	51	CHA	2074	Low
Carson Arts Colony	9	5	9	0	46	CHA	2074	Low
Carson Gardens Apartments	100				101	HUD; Section 8	2031	Moderate
Grace Manor	30				38	HUD; Section 8 (LMSA)	2021	Very High

1. ELI – extremely low-income; VLI – very low-income; LI – low-income; MI – moderate-income.

2. CHA – Carson Housing Authority; LMSA – Loan Management Set-Aside program

Source: Carson Housing Authority, Annual Report FY 2019-2020; HUD, Multifamily Assistance & Section 8 Database, July 29, 2021; California Housing Partnership, August 2021

COST ANALYSIS

State law requires the analysis of at-risk housing to identify “the total cost of producing new rental housing that is comparable in size and rent levels, to replace the units that could change from low-income use, and an estimated cost of preserving the assisted housing developments.” The typical development cost of multifamily housing projects in Carson is about \$404,015 per unit. Estimates are derived from the average projected development costs per unit provided in California Tax Credit Allocation Committee (TCAC) applications for multifamily CHA-assisted projects built since 2015, see Table 2-28. If the 130 units identified by the CHP as facing some level of risk converted to market rate housing during the 10-year period, the total replacement cost would be about \$52,521,993.

Table 2-28: Typical Development Costs of Affordable Housing

<i>Project Name</i>	<i>Year Built</i>	<i>Per Unit Cost^I</i>
Carson Arts Colony	2019	\$466,261
Bella Vita	2018	\$315,340
Via 425 – Phase II	2015	\$430,455
Average		\$404,015

I. Derived from stated “true cash per unit cost” or “effective per unit costs”, where applicable, in TCAC project applications.

Source: Carson Housing Authority, Annual Report FY 2019-2020; California Tax Credit Allocation Committee, Project Staff Reports 2015-2019

The cost of preservation for typical affordable housing project can be estimated by finding the difference between market rent and affordable rent. As shown in Table 2-18 the affordable monthly rental payment for a very low-income, one-bedroom unit in Carson is \$1,126. In FY 2021 the HUD Fair Market Rent, or gross rent estimate, in the Los Angeles-Long Beach-Glendale metropolitan statistical area (MSA) for a one-bedroom unit was \$1,605. The difference between these two prices is the “affordability gap”, which is about \$479 in Carson. Given this affordability gap, the total cost of preserving all 130 at-risk units would be approximately \$62,270 per month or \$747,240 per year. Preserving affordability for the 10-year period would be about \$7,472,400. Preservation costs are therefore lower than replacement costs in the city.

RESOURCES FOR PRESERVATION

The City has an ongoing housing program to facilitate the preservation of at-risk housing units. This program is continued in Chapter 6 of this Housing Element. The City has provided funding assistance in the past, through Redevelopment Low- and Moderate-Income Housing Funds, to assist in the development of a variety of affordable housing projects. The City’s Housing Authority and Successor Agency are responsible for all remaining obligations and programs, including the Low- and Moderate-Income Housing Funds. The Carson Housing Authority assists 673 units available to extremely low- to moderate-income households. None of these units are at risk of converting to market rate during the planning period.

In addition to public financing from the Carson Housing Authority, HUD-based financing and subsidy programs can also preserve at-risk units. This includes projects under the Section 8 program, which have the option of either terminating or renewing their contract with HUD. Property owners with Section 8 contracts may be incentivized to terminate if market conditions would lead to higher returns without the government subsidy. To successfully terminate a Section 8 contract the property owner must meet certain procedural requirements, including filing a Notice of Intent (NOI). Failure to file a NOI with HUD one year before the termination date or to meet other procedures will result in an automatic Section 8 contract rollover for five years. If a property owner files a NOI, HUD may offer a number of incentives for that owner to remain in or renew their contracts. Options include refinancing the property mortgage or established high rents.

Further, pursuant to Government Code Section 65863.10, a property owner intending to terminate a Section 8 contract must also provide six months advance notice to each tenant household. This

notice must include the anticipated date of conversion and rent increase, the possibility of the unit remaining subsidized, the owner's intentions, and the appropriate contacts for additional information. The property owner must also send a copy of the statement to the city or county where the property is located, to the appropriate local housing authority, and to HCD. The statement must indicate the number, age, and income of affected tenants, the type of assistance, and the owner's plans for the project. Like HUD, a city may choose to contact the owner and offer financial or other incentives to induce the owner to maintain the contract. The city may also encourage the owner to sell the property to another owner who will maintain affordability restrictions, including a non-profit, mission-driven developer. While the city cannot block an owner from terminating the contract, they can monitor the process to ensure that all state and federal requirements are met.

Public agencies, non-profit housing corporations, and tenant groups may also be a resource for the preservation of at-risk units. A list of resources available for community and housing development is provided in Chapter 5 of this Housing Element. The City of Carson can continue to work with these organizations to preserve assisted units at risk of conversion to market rate.

2.8 Energy Conservation

The primary uses of energy in urban areas are for transportation, lighting, water heating, and space heating/cooling. The high cost of energy and the environmental impacts of energy consumption demand that efforts be taken to reduce or minimize the overall level of urban energy consumption.

Significant reduction in energy use can be achieved through the coordination of land development and transportation infrastructure, a fundamental component of smart growth. Current citywide zoning regulations encourage low- to medium-density development, such as single-family residential or two- to three-story townhomes, and does not permit residential apartment or condominium towers. Further, industrial uses dominate much of the city's current development. Future development, as identified in the Preferred Plan of the Carson General Plan Update, will be concentrated along the downtown Carson core and in centers outside the core. These centers will contain a mix of uses around major streets, including housing, employment, and neighborhood commercial uses. Connections between centers will be redeveloped as greenways to improve mobility throughout the city and create a more vibrant, connected core area with a diverse mix of uses. This is meant to promote "complete neighborhoods" with a range of everyday amenities within walkable distances. The General Plan Update also seeks to reduce greenhouse gas emissions from energy use and transportation – the two largest sources of emissions in Carson – by promoting green building techniques, renewable energy, and energy efficiency in construction, and the retrofit of existing buildings. Further, denser housing and an emphasis on a diversity of transportation modes and choices will help to reduce vehicle miles traveled (VMT) in private automobiles.

To achieve energy conservation goals, the City will continue strict enforcement of the building standards of the 2019 Title 24 Part 2, California Building Code and Title 24 Building Energy Efficiency Standards (Title 24, Parts 6 and 11) related to energy conservation. Title 24 establishes energy budgets or maximum energy use levels for dwelling units. The standards of Title 24 supersede local regulations and mandate implementation by local jurisdictions.

The City's goal is to achieve maximum use of conservation measures and alternative, renewable energy sources in new and existing residences. By encouraging and assisting residents to utilize energy more efficiently, the need for costly new energy supplies, and the social and economic hardships associated with any future shortages of conventional energy sources, will be minimized.

The City has prepared greenhouse gas (GHG) inventories based on emissions in 2005, 2007, 2010 and 2012. The baseline year is 2005, which means that the future emissions reductions will be measured against emissions that occurred in 2005. According to the City's 2005 baseline GHG emissions inventory, roughly 67 percent of Carson's GHG emissions were generated by commercial energy and 15 percent by on-road transportation. Residential energy accounted for only 4 percent of total emissions. Although state law does not require that GHG emissions be addressed in the General Plan, the California Environmental Quality Act requires that GHG emissions be assessed and mitigated as part of environmental review of any proposed changes to the general plan.

On November 13, 2017, the City Council approved a Climate Action Plan (CAP). The CAP proposes a range of selected strategies with specific actions intended to reduce GHG emissions in a manner consistent with state goals. These strategies include land use and transportation, energy efficiency, solid waste, urban greening, and energy generation and storage. According to the CAP, existing sustainability efforts include land use strategies through the General Plan and energy efficiency strategies. Energy efficient strategies include the following:

- **Energy Leadership Partnership** – The Southern California Edison's (SCE) Energy Leader Partnership program provides a framework that offers enhanced rebates and incentives to cities that achieve measurable energy savings, reduce peak-time electricity demand and plan for energy efficiency. The program has a tiered incentive structure with threshold criteria required to trigger advancement to the next level of participation. The City of Carson is a Silver Member in the program based on their energy efficiency accomplishments to date.
- **Beacon Award Program** – The Beacon Award program is sponsored by the Institute for Local Government and the Statewide Energy Efficiency Collaborative (SEEC). The Beacon Award recognizes California cities and counties that have achieved measurable reductions in GHG emissions and energy savings, adopted policies and programs to address climate change, and promote sustainability. On January 10, 2012, City Council adopted the program to become a Beacon Award Proud Participant, and continues to work towards achieving the Silver, Gold, and/or Platinum Beacon Award levels.
- **Master Plan of Bikeways** – The City developed a Master Plan of Bikeways, which was approved in 2013. The Plan includes projects that, when built, will allow short commute trips to be biked instead of driven, improving local air quality and reducing GHG emissions.

2.9 Future Housing Needs

State law mandates that a Housing Element Update provide an assessment of a jurisdiction's efforts to meet its "fair share" of housing needs, as set forth by the Department of Housing and Community Development's (HCD) Regional Housing Needs Allocation (RHNA) determinations. This section provides such an assessment as required by law.

California's Housing Element law requires that each city and county develop local housing programs designed to meet its fair share of existing and future housing needs for all income groups, as determined by the jurisdiction's Council of Governments (COG) and HCD. This "fair share" allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for the jurisdiction's projected share of regional housing growth across all income categories. Regional growth needs are defined as the number of newly constructed units needed to accommodate the projected increase in households, in addition to the number of units that would have to be added to compensate for anticipated demolitions and changes to achieve an "ideal" vacancy rate.

In the six-county southern California region, of which Carson is a part, the COG responsible for assigning these regional housing needs to each jurisdiction is the Southern California Association of Governments (SCAG). The regional growth allocation process begins with the State Department of Finance's (DOF) projection of statewide housing demand for a multi-year planning period, which is then apportioned by HCD among each of the State's official regions.

SCAG has developed the 6th cycle Final RHNA Plan for the 2021-2029 period. SCAG's adopted 2020 Final RHNA figures identify an overall construction need of 5,618 new units in Carson, a significant increase from the prior cycle's allocation of 1,698 new units. Table 2-28 shows the income breakdown of these units.

Table 2-29: City of Carson Regional Housing Needs Assessment

<i>Income Level¹</i>	<i>Needed Units</i>	<i>Percent of Needed Units</i>
<i>Extremely Low-Income (<30% AMI)²</i>	885	-
<i>Very Low-Income (0-50% AMI)</i>	1,770	31.5%
<i>Low-Income (51-80% AMI)</i>	913	16.3%
<i>Moderate-Income (81-120% AMI)</i>	875	15.6%
<i>Above Moderate-Income (120% AMI)</i>	2,060	36.7%
Total	5,618	100%

1. Income levels were determined by county median household income. Based on 2013-2017 ACS data, SCAG used a median income of \$61,015 in Los Angeles County to determine allocations.

2. Development needs of extremely low-income units are assumed to be 50 percent of very low-income housing needs.

Source: SCAG Regional Housing Needs Assessment, 2021

The SCAG Planning Period runs from October 15, 2021 to October 15, 2029. The Projection Period runs from June 20, 2021 to October 15, 2029. This means that all new units built after June

30, 2021 are credited toward the RHNA for this period. A discussion of the city's growth needs and potential development sites that could accommodate this need is provided in Chapter 5 and Appendix C.

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3 Affirmatively Furthering Fair Housing

California Assembly Bill (AB) 686, passed in 2018, amended California Government Code Section 65583 to require all public agencies to Affirmatively Further Fair Housing (AFFH). As a result, Housing Element Updates produced on or after January 1, 2021 must identify impediments to fair housing, provide an assessment of fair housing and develop meaningful and specific programs to fulfill AFFH requirements. A jurisdiction may incorporate elements of a separately composed assessment of fair housing if applicable. The City of Carson approved an Analysis of Impediments to Fair Housing Choice (AI) in May 2020. This section summarizes some of the major findings of that report and provides more current data where possible. While the 2020 AI used HUD's November 2017 AFFH data release (Table AFFHT0004), this chapter relies on the more current July 2020 release (Table AFFHT0006) where possible. Additional data provided by the California Department of Housing and Community Development (HCD) prepared for the assessment of fair housing is also used. An analysis of the sites inventory, including whether the sites identified improve or exacerbate conditions of fair housing, is available in Appendix C.

The 2020 AI was prepared in a manner consistent with the AFFH Final Rule and accompanying commentary published by HUD. To that end, it incorporated meaningful community participation, consultation and coordination. This included a Fair Housing Survey, a Fair Housing Forum and a public review meeting. The results of these efforts informed the assessment provided in this section. The 2020 AI is included as Appendix E.

3.1 Enforcement and Capacity

Fair housing services are essential to ensuring that all residents of a community are able to access a variety of housing types that suit their needs. Of particular importance is the accessibility of affordable housing options to State and federally protected groups, including those based on race, color, gender, religion, national origin, familial status, disability, age, marital status, ancestry, source of income, sexual orientation, genetic information, or other arbitrary factors. Fair housing services help Carson residents understand and protect their right to access housing.

The Housing Rights Center (HRC) of Los Angeles is the fair housing service provider for the City of Carson. The HRC has physical offices in Los Angeles, Van Nuys, and Pasadena. Services provided by the HRC include landlord tenant counseling, outreach and education, and discrimination investigation. The HRC provides a full range of free services including housing counseling, discrimination investigation and disability accommodations, fair housing education, and Project Place: Monthly Rental Listing.

Housing discrimination complaints provide one source of information to evaluate the extent of fair housing issues in a community. Housing discrimination complaints can be filed directly with HUD,. Carson's residents may also file complaints with the State Department of Fair Employment and Housing (DFEH) and local fair housing providers such as the HRC. According to the 2020 AI, there were 15 total fair housing complaints between 2008 and 2019. The most common complaint was on the basis of disability (nine complaints), followed by race (three complaints). Of these complaints, 11 were found to have no cause determination and five complaints led to successful settlement/conciliation. The most prevalent complaint issue was discriminatory refusal to rent, followed by discriminatory terms, conditions, privileges, or services and facilities.

The 2020 AI determined that there were a number of fair housing outreach and capacity issues in Carson. Public input and the Fair Housing Survey, although it had few responses, indicated that there was a lack of fair housing infrastructure in Carson due to little collaboration among agencies. Further, there was insufficient fair housing education and an insufficient understanding of credit needed to access mortgages. Accomplishments made by the City in reducing these issues, as well as actions to further address these issues, are discussed further in the final section of this chapter.

3.2 Assessment of Fair Housing

Per State law, the Housing Element must include an analysis of integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty (R/ECAPs), disparities in access to opportunity, and disproportionate housing needs (including displacement risk). Each analysis should assess the local and regional impact as well as trends and patterns. Other relevant factors including other local data and knowledge should be included.

INTEGRATION AND SEGREGATION

Race and Ethnicity

Carson is a majority-minority city, meaning that the majority of the population does not identify as white, non-Hispanic/Latino. As discussed in Chapter 2, the majority of Carson residents are Hispanic/Latino of any race, Asian alone, or Black or African American alone. Table 3-1 demonstrates that the "minority" populations in Carson have been continually growing since 2000 while the number of white, non-Hispanic/Latino residents has been steadily declining. Per Table 3-2, this is similar to trends seen in Los Angeles County as a whole, with a few important differences. While the Black or African American alone population in the county has been continually declining, it has stabilized and increased over the past decade in Carson. Further, while the Hispanic or Latino population of any race has continually increased in the county, it has decreased over the last decade in Carson.

Table 3-1: Population Growth by Race/Ethnicity in Carson, 2000 - 2019

Race/Ethnicity	Population			Percent Change	
	2000	2010	2019	2000-2010	2010-2019
White (alone)	10,767	7,022	6,462	-34.8%	-8.0%
Black or African American (alone)	22,485	21,385	21,624	-4.9%	1.1%
Asian (alone)	19,711	23,105	24,176	17.2%	4.6%
Other (alone)	5,435	4,785	5,441	-12.0%	13.7%
Hispanic or Latino (any race)	31,332	35,417	34,376	13.0%	-2.9%
Minority ¹	78,963	84,692	85,617	7.3%	1.1%
Total	89,730	91,714	92,079	2.2%	0.4%

1. Minority refers to any person not listed as white (alone).

Source: U.S. Census Bureau, 2000 and 2010 Census Report, 2015-2019 American Community Survey

Table 3-2: Population Growth by Race/Ethnicity in Los Angeles County, 2000 - 2019

Race/Ethnicity	Population			Percent Change	
	2000	2010	2019	2000-2010	2010-2019
White (alone)	2,959,614	2,728,321	2,641,770	-7.8%	-3.2%
Black or African American (alone)	901,472	815,086	790,252	-9.6%	-3.0%
Asian (alone)	1,124,569	1,325,671	1,454,769	17.9%	9.7%
Other (alone)	291,470	261,638	306,345	-10.2%	17.1%
Hispanic or Latino (any race)	4,242,213	4,687,889	4,888,434	10.5%	4.3%
Minority ¹	6,559,724	7,090,284	7,439,800	8.1%	4.9%
Total	9,519,338	9,818,605	10,081,570	3.1%	2.7%

1. Minority refers to any person not listed as white (alone).

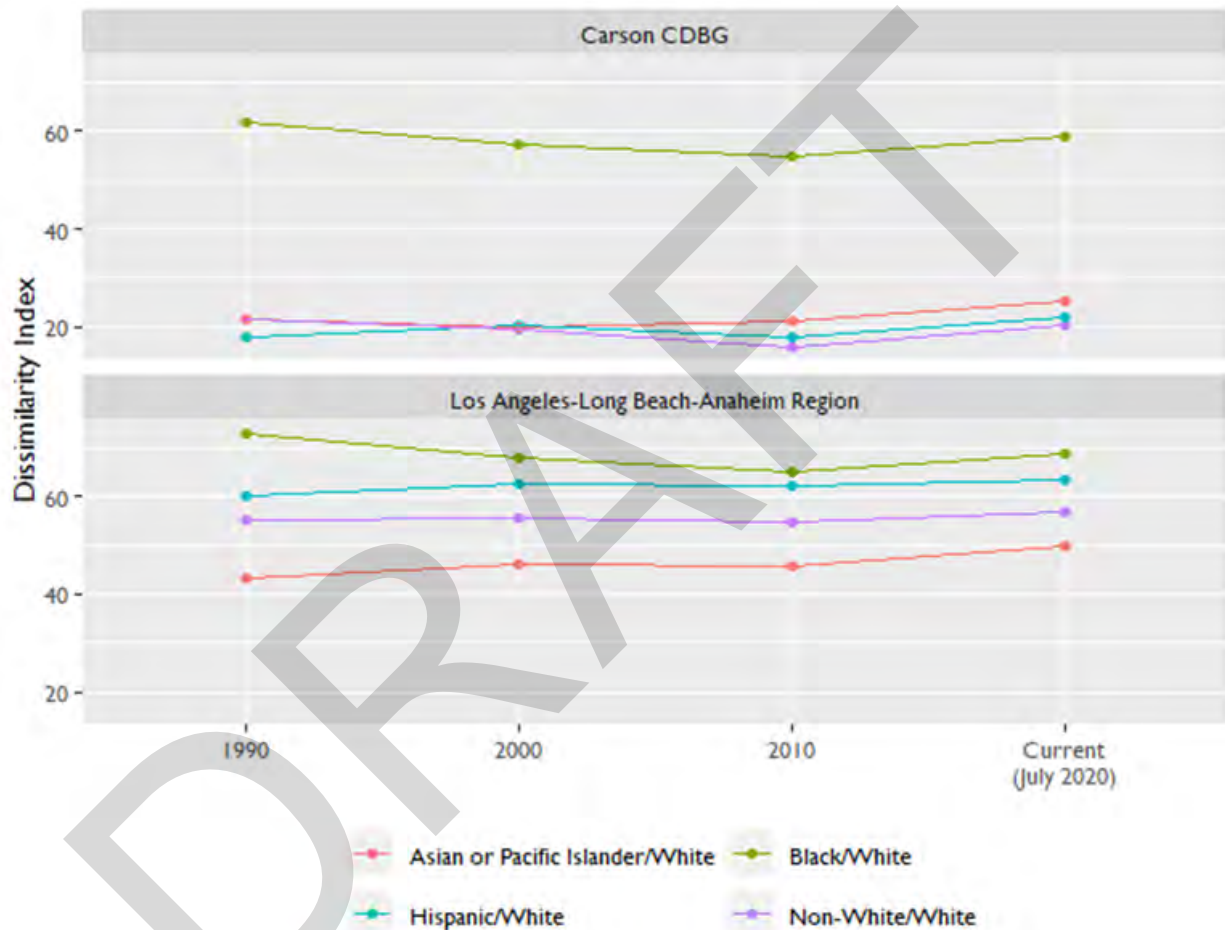
Source: U.S. Census Bureau, 2000 and 2010 Census Report, 2015-2019 American Community Survey

One method to quantify segregation in a community is the “dissimilarity index,” which measures the relative geospatial composition of two demographic groups. The higher the index value, the higher the level of segregation. HUD considers an index value below 40 to indicate low segregation, while 40-54 indicates moderate segregation and above 55 indicates high segregation. It is important to note that the dissimilarity index uses non-Hispanic/Latino white residents as the primary comparison group and does not directly measure segregation between minority groups.

During the 2010 to 2017 period, the 2020 AI demonstrated increasingly high levels of segregation for Black households, while both Asian and Hispanic households experienced relatively low but

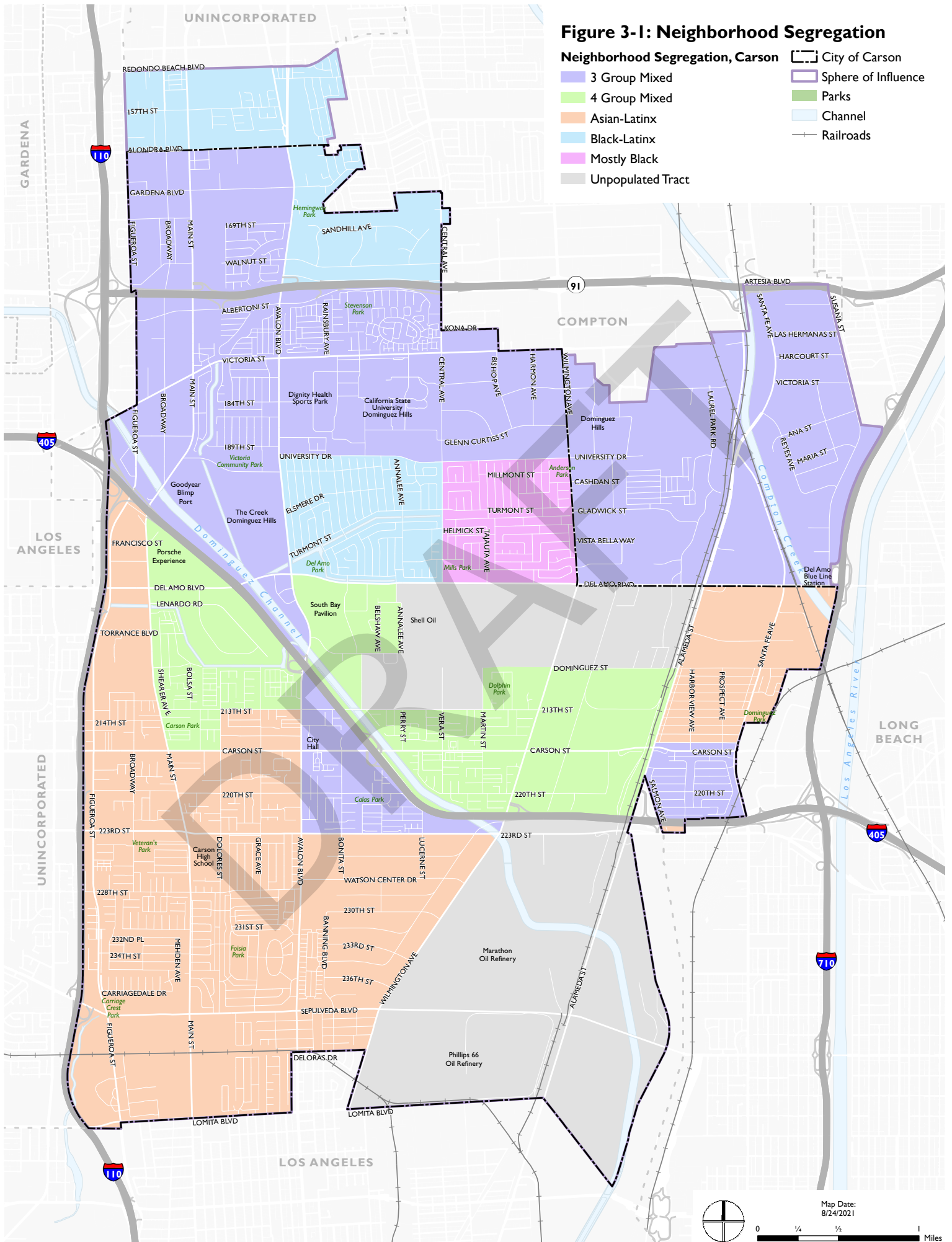
increasing levels of segregation. Chart 3-1 confirms these trends with more current data. Carson has relatively low levels of segregation for “non-white” racial/ethnic groups compared to the greater Los Angeles region, except for Black households which have the highest index values for both geographic areas.

Chart 3-1: City of Carson and Los Angeles Region Dissimilarity Index



Source: July 2020 HUD AFFHT0006 Table 12

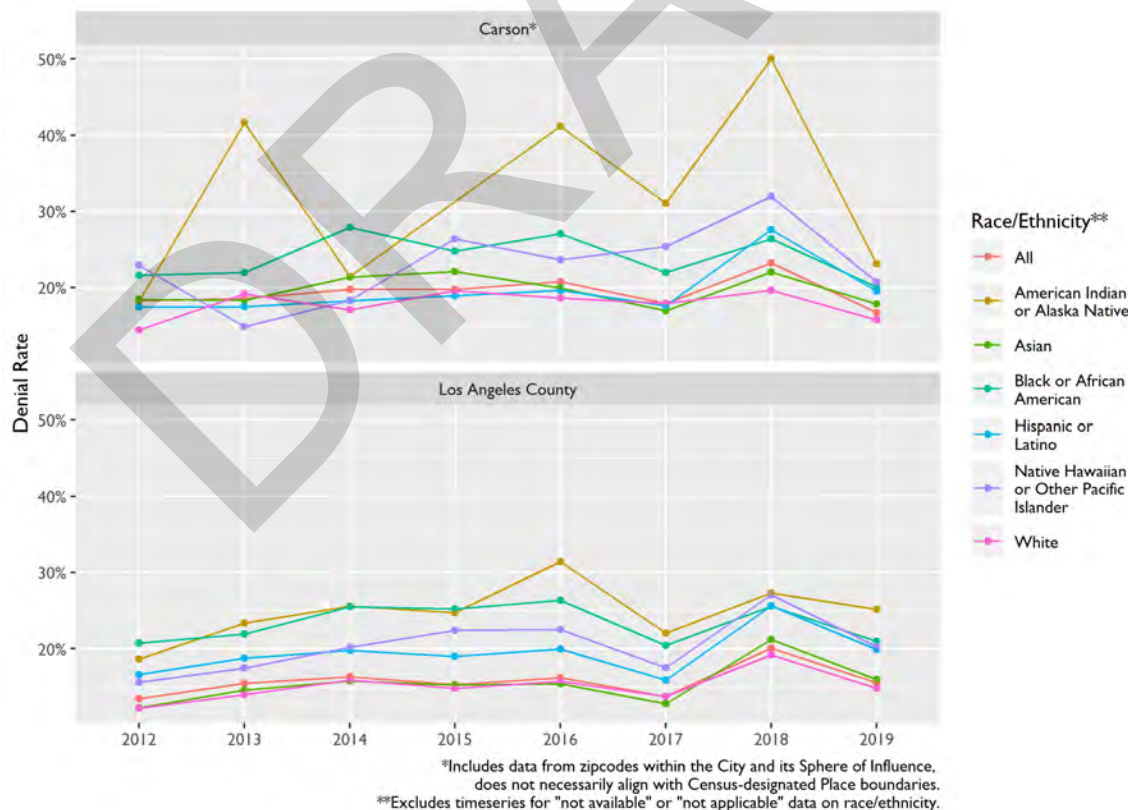
Since Carson is a majority-minority city, the dissimilarity index provided by HUD may not provide a precise assessment of patterns of segregation in the city. HCD has provided neighborhood segregation typologies, created by the Urban Displacement Project at UC Berkeley, to capture such nuances. Segregation typologies identify census tracts which contain racial/ethnic groups with at least a 10 percent representation within that tract. As seen in Figure 3-1, most tracts in Carson contain a mixture of at least two racial/ethnic groups. There are no mostly white tracts in Carson, and there are a number of three or four group mix tracts.



Tracts identified as three or four group mix are those tracts which contain three or four racial/ethnic groups, including Black, Latinx, White, Asian and Other, that surpass the 10 percent representation threshold. These tracts are mostly in the northern and central portions of the city, while Asian-Latinx tracts are predominant in the southern portion of the city. There is one mostly Black tract along Del Amo Boulevard located on the eastern border of the city. Although there are a number of mixed tracts, this confirms the findings of the 2020 AI that African American or Black residents are typically segregated to the northern areas of the city.

Information on access to mortgage finance services can also illustrate racial or ethnic housing disparities within a jurisdiction. The Federal Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. This data is available by race, ethnicity, sex, loan amount, and the income of mortgage applicants and borrowers. As per Chart 3-2, during the 2012 to 2019 period American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, and Black or African American home loan applicants in Carson received denial rates higher than overall applicants. These include loan applications for home purchase, home improvement and refinancing. In 2018 and 2019 Hispanic or Latino applicants also received higher denial rates. These results are similar to those of Los Angeles County, although the denial rates for American Indian or Alaska Native applicants can be much higher within the City depending on the year.

Chart 3-2: City of Carson Denial Rates by Race/Ethnicity of Applicant, 2012 - 2019



Source: HMDA, 2012-2019

Persons with Disabilities

The U.S. Census Bureau provides six categories of disability: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. According to 2015-2019 American Community Survey estimates, approximately 11,251 or 12.2 percent of Carson residents were living with a disability. This is higher than the proportion of residents living with a disability in Los Angeles County, which was approximately 9.9 percent during the same year. Further, 48.8 percent of the population living with a disability in Carson were aged 65 years or older.

According to the 2020 AI, there is no geographic concentration of households by disability type in any one area of the City of Carson. Per 2015-2019 American Community Survey estimates compiled by HCD, Figure 3-2 indicates that the percent of the population living with a disability does not exceed 20 percent in any tract within Carson and confirms that there is wide dispersal of persons with disabilities throughout the city.

Familial Status

In 1988, the Fair Housing Amendments Act added familial status to the list of protected classes. In most instances, this applies to a housing provider refusing to rent or sell units to families with children. However, housing designated for elderly residents (55 years or older) is permitted under the Housing for Older Persons Act of 1995 in the form of “senior housing” and may exclude families with children.

As discussed in Chapter 2, most households in Carson are considered to be family households (81.3 percent) according to the 2015-2019 American Community Survey. Approximately 9,183 (36.4) percent of all households contained at least one person under the age of 18 in 2019. Married-couple families with children are the most prevalent type of household with children comprising about 20.5 percent of all households, followed by female householders (5.1 percent), cohabiting couples (2.2 percent), and male householders (1.2 percent).

Figure 3-3 presents the geographic distribution of female householder households with children in Carson. Based on 2015-2019 American Community Survey estimates compiled by HCD, the figure indicates that no tracts exceed 56.0 percent of children in female householder households in the city. While there is a slight concentration of such households in tracts in the eastern and central portions of the city, it is not excessive and matches distribution patterns found in neighboring cities. There is no significant geographic concentration of other types of family households.

Income Level

The geographic concentration of households and individuals by income level is another facet of segregation in a community. One method to measure the extent of such patterns of segregation is through the concentration of low- or moderate-income (LMI) individuals. HUD defines a LMI area as a census tract or block group where over 51 percent of the population is LMI – based on the HUD income definition of up to 80 percent of the area median income (AMI). Figure 3-4 presents the LMI areas by census tract in Carson. No tract exceeds a 76.0 percent concentration of LMI individuals. LMI areas are spread throughout the city and are generally located along Avalon

Boulevard. The relative proportion of LMI areas within Carson is lower than neighboring cities like Compton and Long Beach, and similar to cities like Torrance.

Further, changing poverty rates in the city can provide an insight into the economic wellbeing of households and individuals in Carson. According to American Community Survey Five-Year estimates, the population poverty rate decreased from 11.5 percent in 2014 to 8.7 percent in 2019. The family poverty rate decreased from 8.3 percent (12.7 percent for families with children) in 2014 to 6.5 percent (10.2 percent for families with children) in 2019.

DRAFT

Figure 3-2: Persons with a Disability

Percent of Population with a Disability

- 10.1% - 18.8%
- 0% - 10.0%

- City of Carson
- Sphere of Influence
- Parks
- Channel
- Railroads

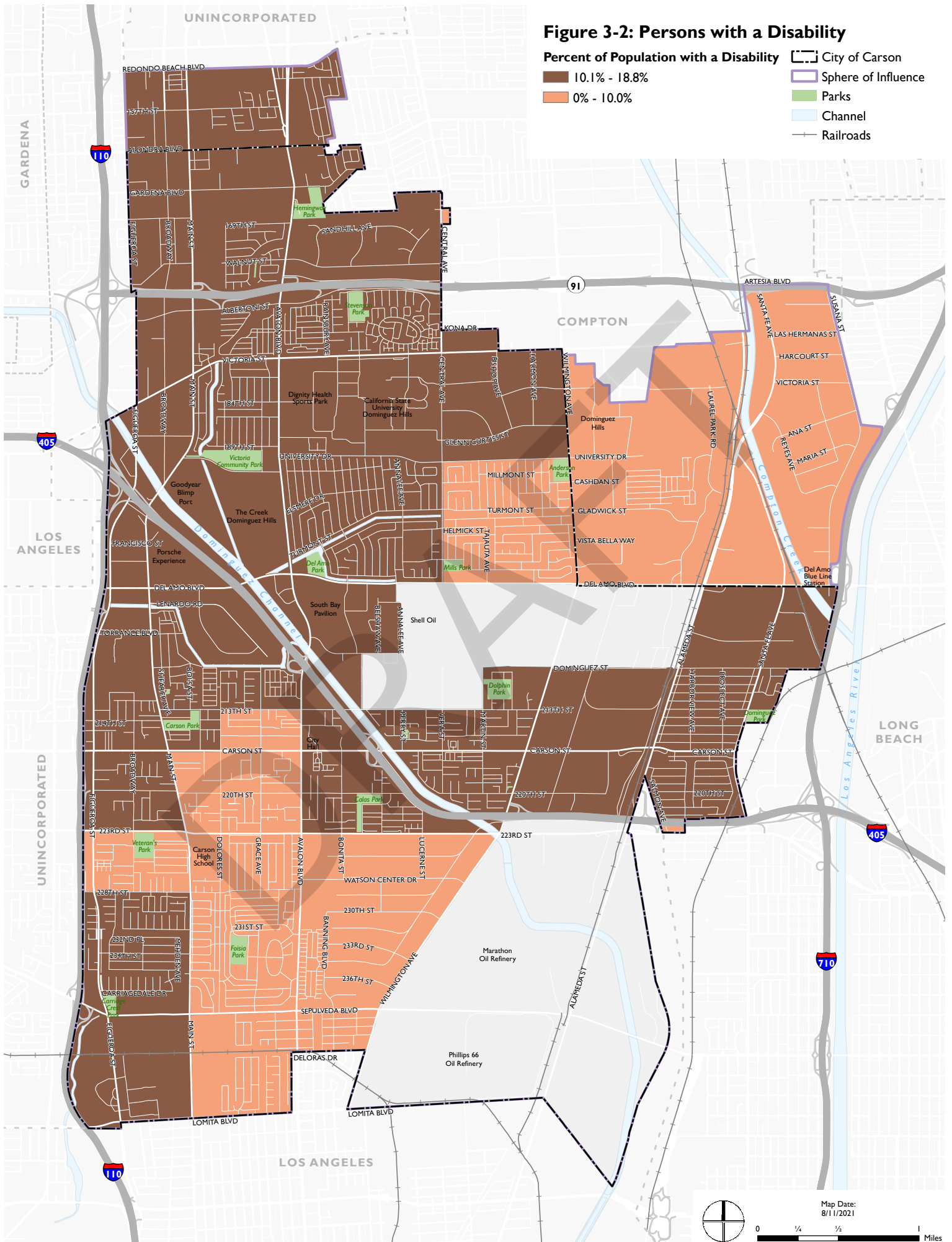


Figure 3-3: Familial Status

**Percent of Children in Female Householder,
No Spouse/Partner Present Households**

25.1% - 55.4%

0.0% - 25.0%

- City of Carson
- Sphere of Influence
- Parks
- Channel
- Railroads

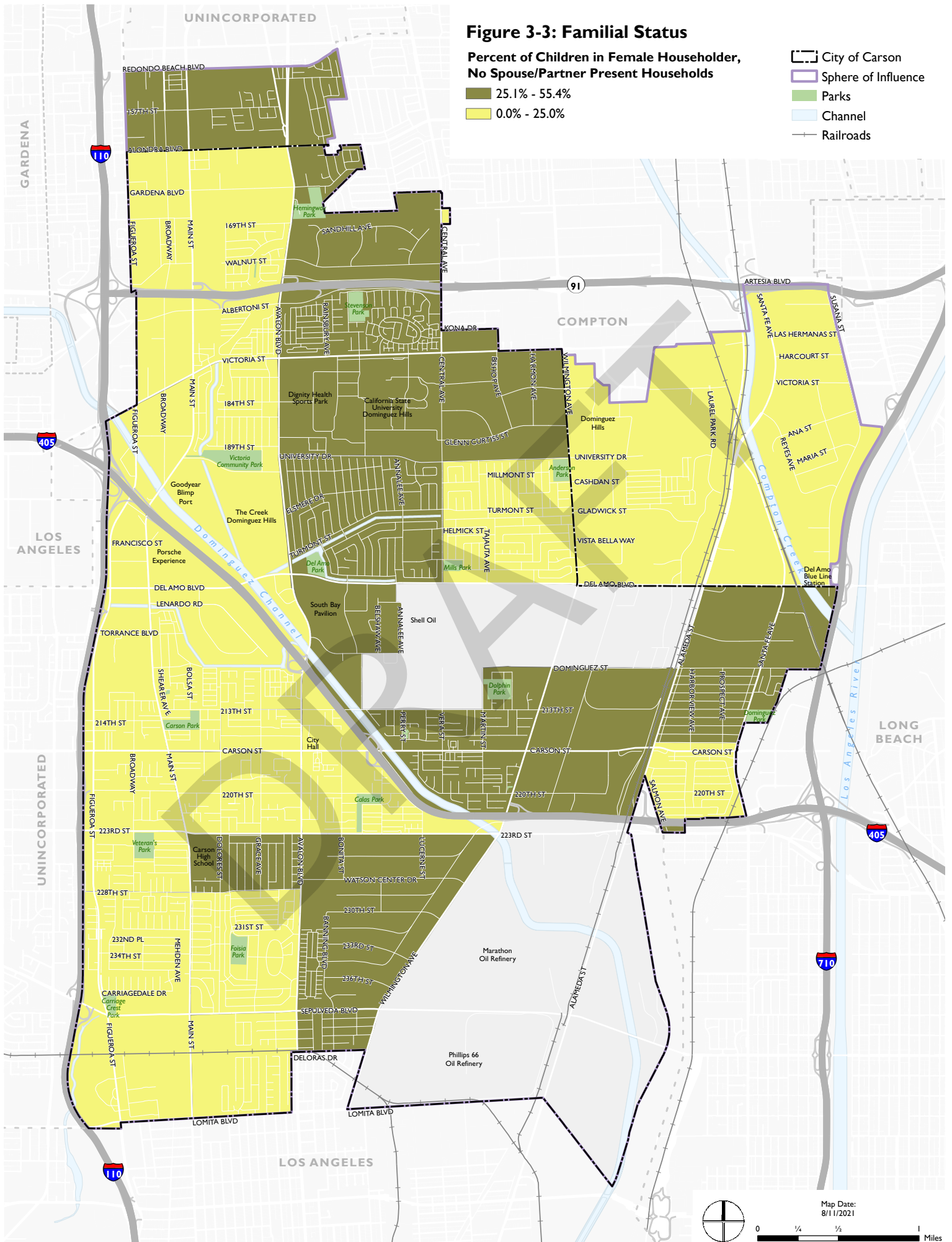
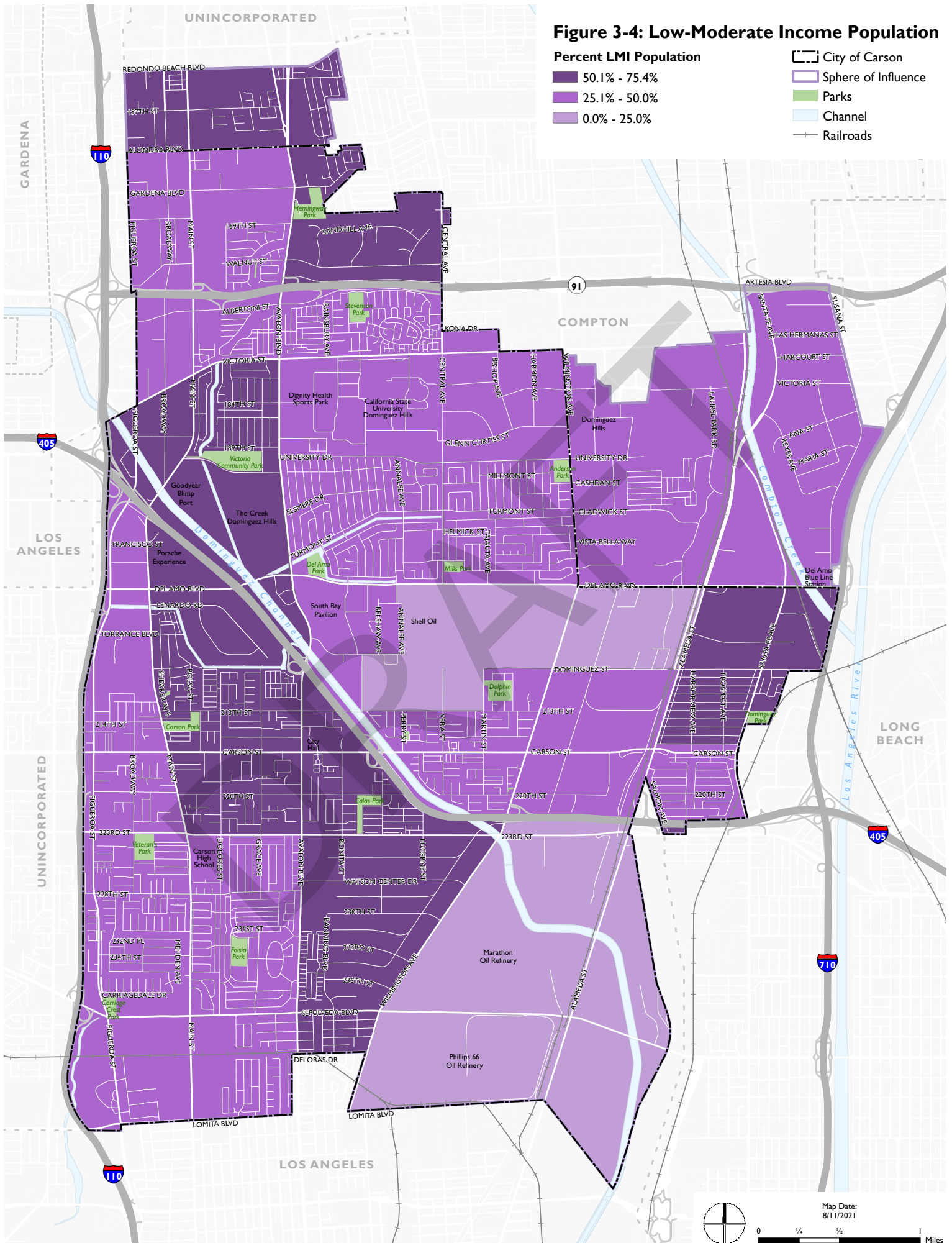


Figure 3-4: Low-Moderate Income Population

Percent LMI Population

- 50.1% - 75.4%
- 25.1% - 50.0%
- 0.0% - 25.0%

- City of Carson
- Sphere of Influence
- Parks
- Channel
- Railroads



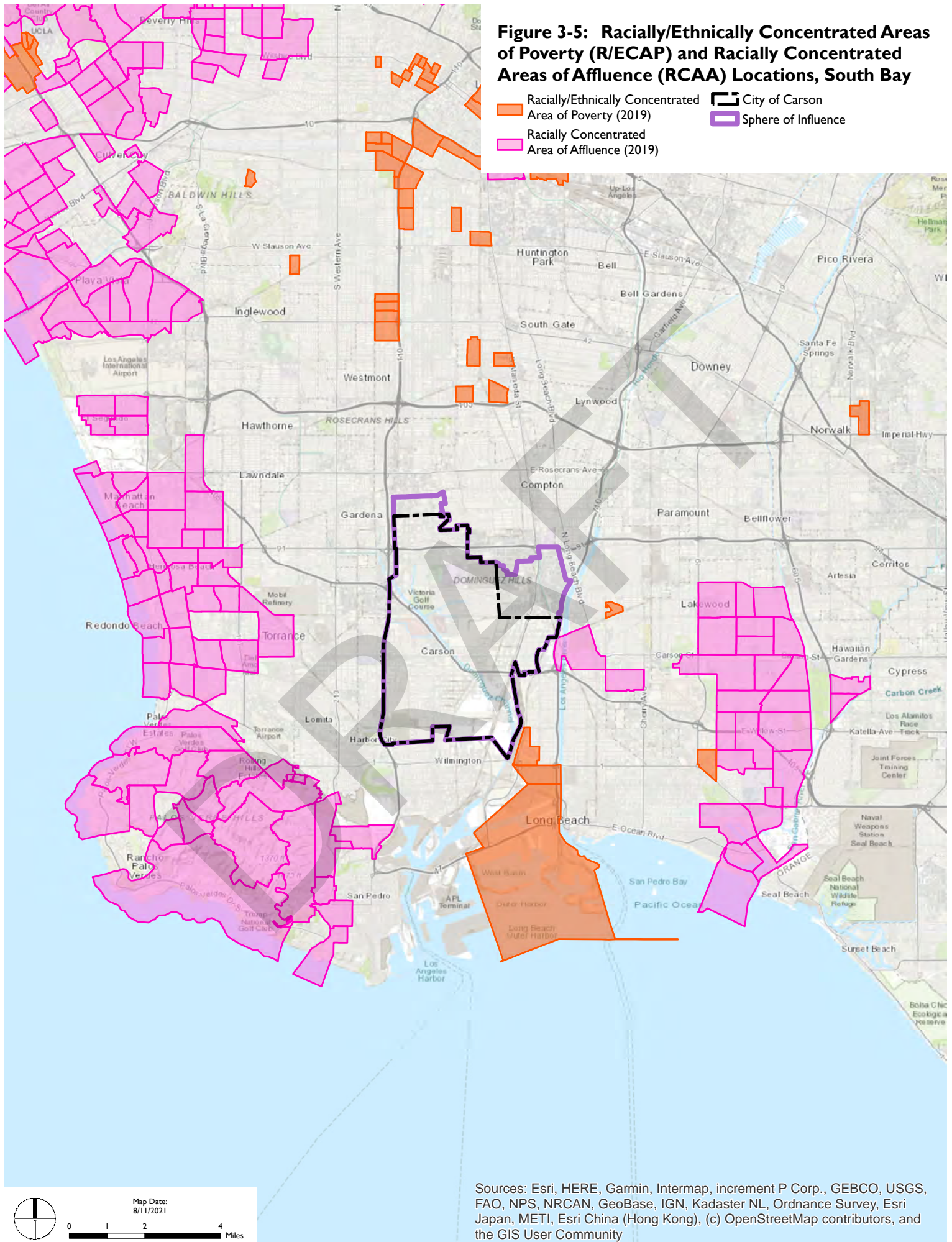
R/ECAPS AND RCAAS

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated a R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census tract must exceed a threshold of 40 percent.

There were no R/ECAPs in the City of Carson during the preparation of the 2020 AI. As of the July 2020 HUD data release there were still no R/ECAPs. Further, estimates provided by the 2015-2019 American Community Survey indicate that no R/ECAPs exist in the city. Per California Tax Credit Allocation Committee (TCAC) metrics there were also no TCAC areas of high segregation and poverty within Carson as of 2020. Based on 2015-2019 American Community Survey estimates, Figure 3-5 presents the number of R/ECAPs in the South Bay region. There are a number of R/ECAPs in Long Beach and other communities to the north of Carson.

Determining the concentration of racially or ethnically concentrated areas of affluence (RCAAs) is also important to understanding the extent of fair housing issues in a community. While there is no formal definition for an RCAA, it is generally considered to be an area with high concentrations of wealthy, white residents. For the purposes of this assessment, RCAAs are considered to be census tracts where at least 40 percent of the population is white, non-Hispanic/Latino and the median income exceeds 120 percent of the State median income. Based on 2015-2019 American Community Survey estimates, there are no tracts that could be considered RCAAs in Carson. Figure 3-5, which provides a regional view of potential RCAAs, demonstrates that a number of neighboring jurisdictions do contain such tracts, including the majority of communities in Manhattan Beach and Rancho Palos Verdes.

Figure 3-5: Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAA) Locations, South Bay



DISPARITIES IN ACCESS TO OPPORTUNITY

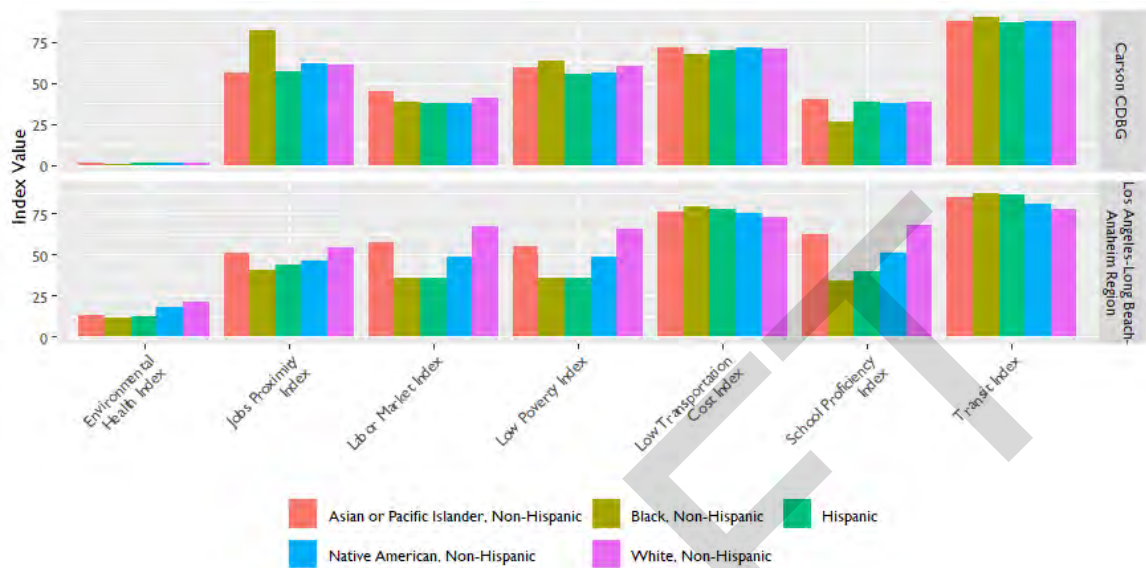
HUD has provided a set of opportunity indices to quantify disparities in Access to Opportunity. These indices can measure geographic trends and levels of access within a community. The 2020 AI provides a thorough analysis of these indices, elements of which are summarized, reproduced and updated below. Charts 3-3 and 3-4 provide the values of each index as of July 2020, which has remained relatively stable compared with the 2017 data release. Chart 3-3 highlights the entire population, while Chart 3-4 shows the population living below the federal poverty line. The charts also compare index values between Carson and the Los Angeles-Long Beach-Anaheim region. The higher the index score, the better the outcome in that particular area. Each index is defined as follows:

- **Environmental Health** — Summarizes potential exposure to harmful toxins at a neighborhood level.
- **Jobs Proximity** — Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA).
- **Labor Market** — Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood.
- **Low Poverty** — A measure of the degree of poverty in a neighborhood, at the Census tract level.
- **Low Transportation Cost** — Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region.
- **School Proficiency** — School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
- **Transit** — Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters.

The charts confirm many of the findings made in the 2020 AI. For instance, non-Hispanic Black households have lower access to school proficiency when compared to other races or ethnicities, although this imbalance reduces slightly when only considering households below the poverty line. Further, non-Hispanic Black households have relatively higher values than other groups for the jobs proximity index. Also of note is that non-Hispanic Native American households below the poverty line had relatively lower values than other groups in the jobs proximity and labor market indices.

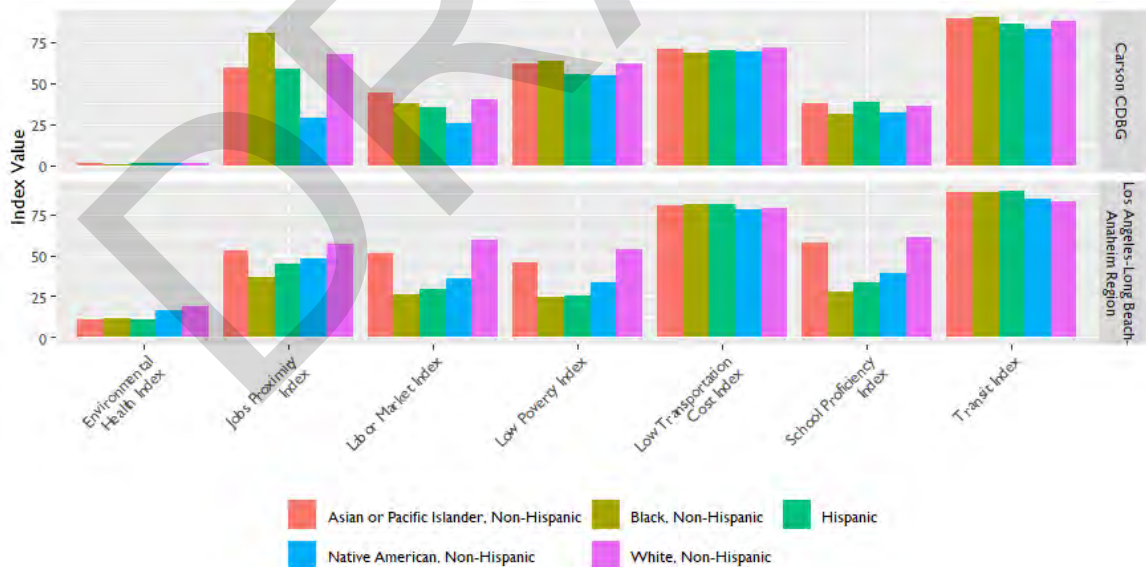
Levels of opportunity are similar in Carson to those of the wider Los Angeles region, with a few notable exceptions. Environmental health index outcomes are worse in Carson than in the region, which conforms to the city's history of hazardous and landfill uses. However, scores in the jobs proximity index, low poverty index, and transit index are generally higher in the city than in the county. This pattern holds for both the total population and for those living under the poverty line.

Chart 3-3: Opportunity Indices – Total Population



Source: HUD, AFFHT0006 Table 12, July 2020

Chart 3-4: Opportunity Indices – Population Living Below the Federal Poverty Line



Source: HUD, AFFHT0006 Table 12, July 2020

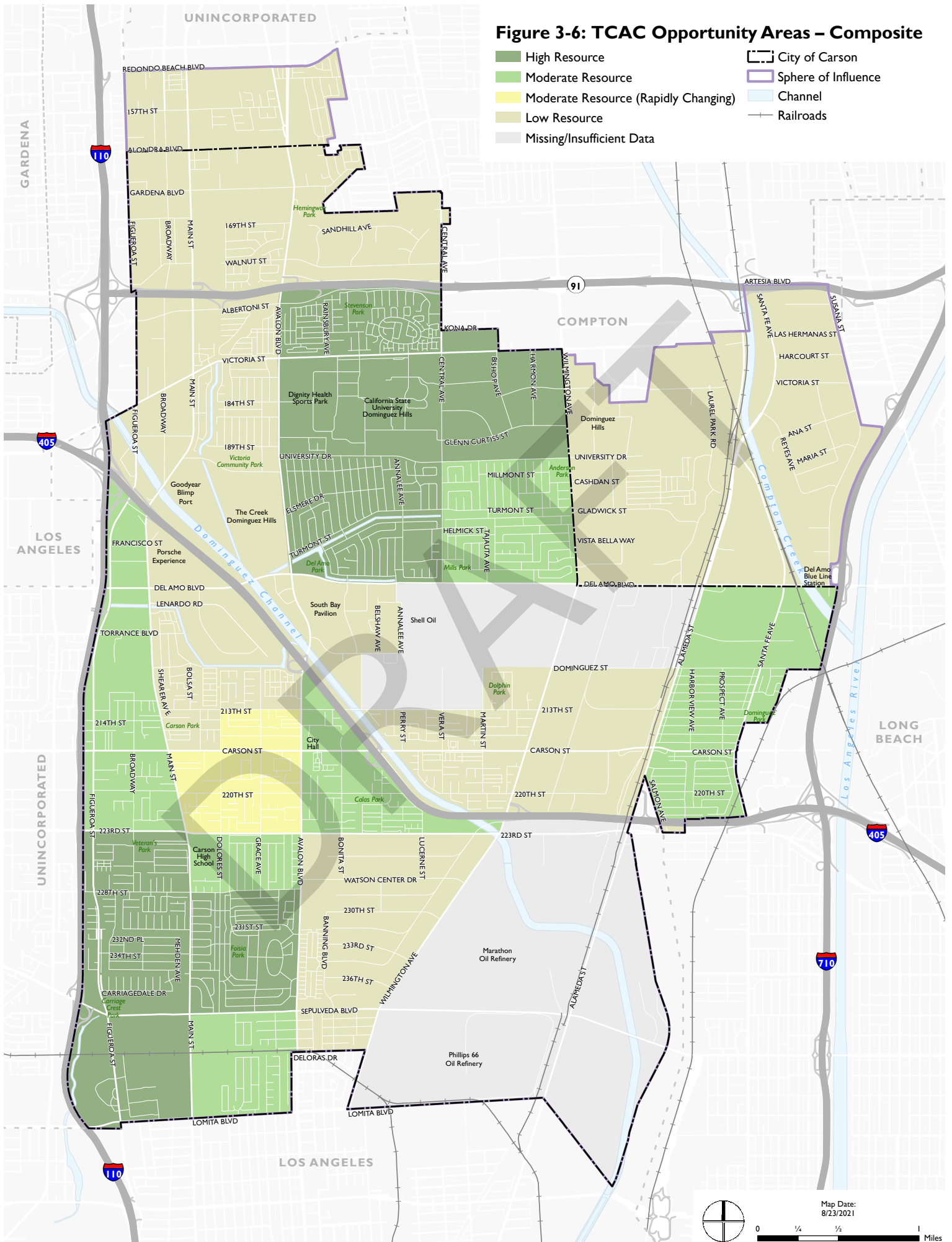
While HUD opportunity indices provide a useful metric of access to opportunity at the jurisdiction level, they do not explain the distribution of opportunity within that community. To provide more precise measures, HCD and TCAC convened in the California Fair Housing Task Force to “provide

research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task Force developed a series of “opportunity maps” to determine the level of resources within a jurisdiction. High resource areas are those that offer low-income adults and children the best access to a high-quality education, economic advancement, and good physical and mental health. By aggregating opportunity index scores across the economic, environmental, and educational domains, HCD and TCAC created a composite index to measure resources at the tract level.

Highest resource tracts are the top 20 percent of tracts with the highest index scores relative to the region, while high resource tracts are the next 20 percent. The remaining tracts are then evenly divided into the low resource and moderate resource categories. Rapidly changing moderate resource tracts are those identified as moderate resource that may soon become high resource based on recent trends. Tracts with high levels of poverty and segregation are filtered into a separate category – “high segregation and poverty.”

According to the 2021 composite opportunity index, there are a number of high resource and moderate resource areas in the city. However, there are no highest resource tracts in the city. Displayed in Figure 3-6, high resource tracts are clustered in north Carson, largely around California State University Dominguez Hills. There is an additional cluster of high resource tracts in the southwestern section of the city along E. Sepulveda Boulevard and Main Street. Further, there is a rapidly changing moderate resource tract along Carson Street in the downtown core, along with other moderate resource tracts. There are seven low resource tracts within the City and its Sphere of Influence, many of which are situated west of Avalon Boulevard and north of Carson Street, including the site of the large Boulevards at South Bay mixed-use development. Many of these low resource tracts will be redeveloped with mixed-uses described by the land use designations in the General Plan Update.

Figure 3-6: TCAC Opportunity Areas – Composite



DISPROPORTIONATE HOUSING NEEDS

The 2020 AI provided a thorough assessment of disproportionate housing needs in Carson. This section will summarize its findings and provide additional context in three areas: cost burden, overcrowding and displacement risk. While the 2020 AI relied on 2012-2016 HUD Comprehensive Housing Affordability Strategy (CHAS) data estimates and 2014-2018 American Community Survey estimates, more current estimates are available. Where applicable, this section relies on the 2013-2017 HUD CHAS data release and the 2015-2019 American Community Survey.

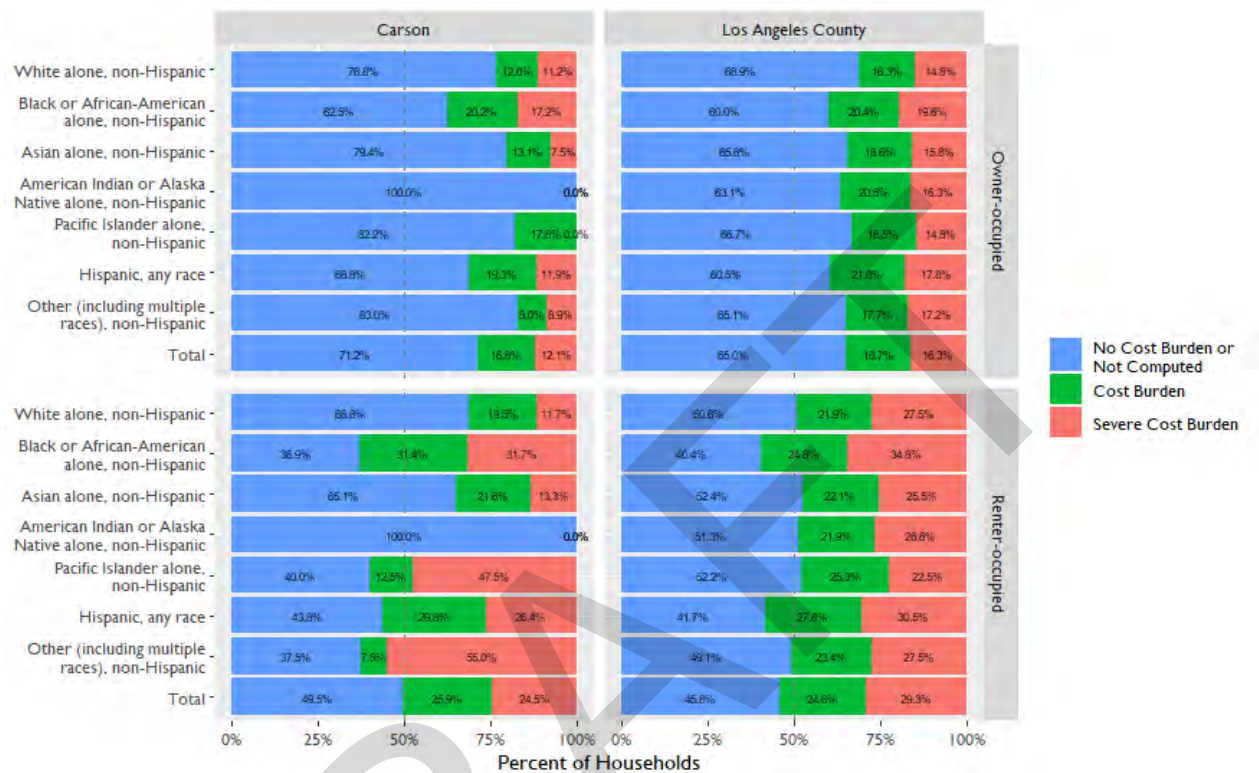
The 2020 AI concluded that cost burden remains a major problem in Carson, which is confirmed by the cost burden analysis conducted in Chapter 2 of this Housing Element (Table 2-11). Further, the 2020 AI indicates that cost burden and housing problems more generally impact a large number of Black, Asian, and Hispanic households. Per the 2012-2016 HUD CHAS data release, households with problems tended to congregate in the southern and central parts of the city where over 50 percent of households experience housing problems.

Cost Burden

The 2013-2017 HUD CHAS data release includes a breakdown of cost burden, also known as overpayment, by race/ethnicity and income. Housing cost burden is most commonly measured as the percentage of gross income spent on housing, with 30 percent being a usual threshold for “cost burden” and 50 percent being a threshold for “severe cost burden.” As is evident in Chart 3-5, cost burden rates are generally higher across all races and ethnicities for renter-occupied households than for owner-occupied households. Percentages may differ from those determined in Chapter 2 due to rounding errors within the CHAS dataset.

Confirming the findings of the 2020 AI, cost burden is unevenly distributed by race/ethnicity. Non-Hispanic Black or African-American households, both renters and owners, were more likely to experience cost burden than any other group. The majority of non-Hispanic Black or African-American, non-Hispanic Pacific Islanders, other non-Hispanic race, and Hispanic renter-occupied households faced some level of cost burden during the period, while most non-Hispanic white, non-Hispanic Asian, and non-Hispanic American Indian or Alaska Native households did not.

HCD has compiled 2015-2019 American Community Survey estimates to determine the geographic distribution of cost burden within a jurisdiction. Tract level estimates, shown in Figures 3-12 and 3-13, indicate areas with concentrated cost burden for owner- and renter-occupied households respectively. As shown in Figure 3-7, in most of Carson less than 40 percent of owner-occupied households experience some level of cost burden. There is some concentration of cost burden in the northern portion of the city, where over 50 percent of households within a tract experience cost burden. Figure 3-8 demonstrates that, for the majority of tracts, less than 60 percent of renter-occupied households in Carson experience some level of cost burden.

Chart 3-5: Cost Burden by Race/Ethnicity and Tenure


Source: U.S. Department of Housing and Urban Development, 2013-2017 CHAS

Overcrowding

Housing units are considered overcrowded when there are 1.01 to 1.50 persons per room (including dining and living rooms but excluding bathrooms and kitchen). Units are considered severely overcrowded when there are 1.51 persons or more per room. As discussed in Chapter 2, overcrowding may be the result of a lack of affordability and indicate the need for larger housing units. Per 2015-2019 American Community Survey estimates, renters are more likely to experience some level of overcrowding than homeowners. This pattern exists both in Carson and in the county. Overcrowding data is not available by race/ethnicity of the household.

HCD has also compiled overcrowding data from the California Health and Human Services Agency (CHHS) by geographic distribution. As shown in Figure 3-9, the vast majority of tracts in the city contain less than 20 percent overcrowded households. The highest rates of overcrowding are seen in the southern portion of the city. The census tract with the highest concentration of overcrowding also has a relatively high concentration of renter-occupied households experiencing cost burden. To ameliorate overcrowding, housing policy will need to continue to focus on encouraging the development of larger units accessible to lower-income households.

Figure 3-7: Homeowner Cost Burden

Percent of Owner Households with Mortgages whose Monthly Owner Costs are 30.0% or More of Household Income

- 50.1% - 60.8%
- 40.1% - 50.0%
- 30.1% - 40.0%
- 22.5% - 30.0%

- City of Carson
- Sphere of Influence
- Parks
- Channel
- Railroads

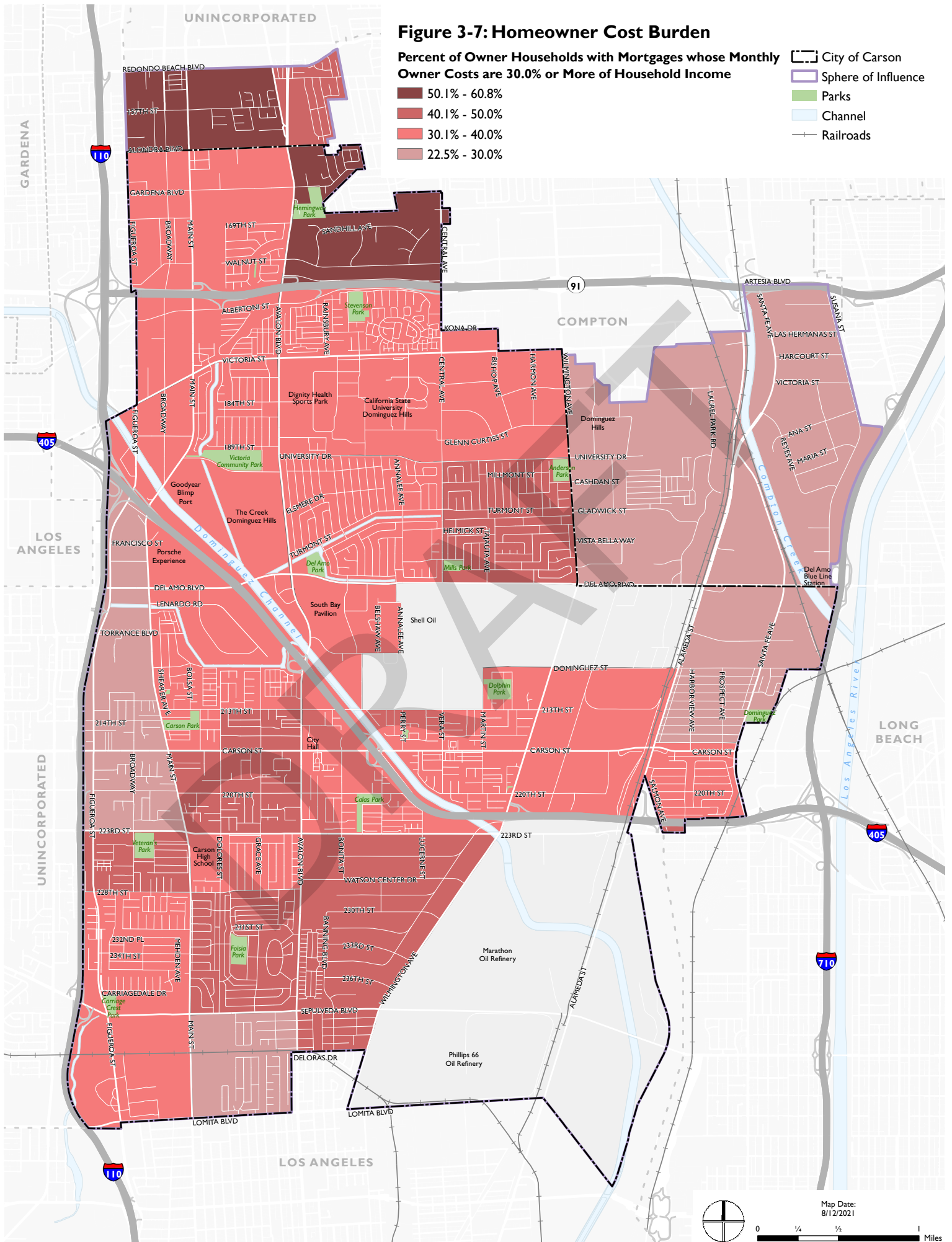


Figure 3-8: Renter Cost Burden

Percent of Renter Households for whom Gross Rent (Contract Rent Plus Tenant-Paid Utilities) is 30.0% or More of Household Income

- Over 60.0%
- 40.1% - 60.0%
- 20.1% - 40.0%
- 0.0% - 20.0%

- City of Carson
- Sphere of Influence
- Parks
- Channel
- Railroads

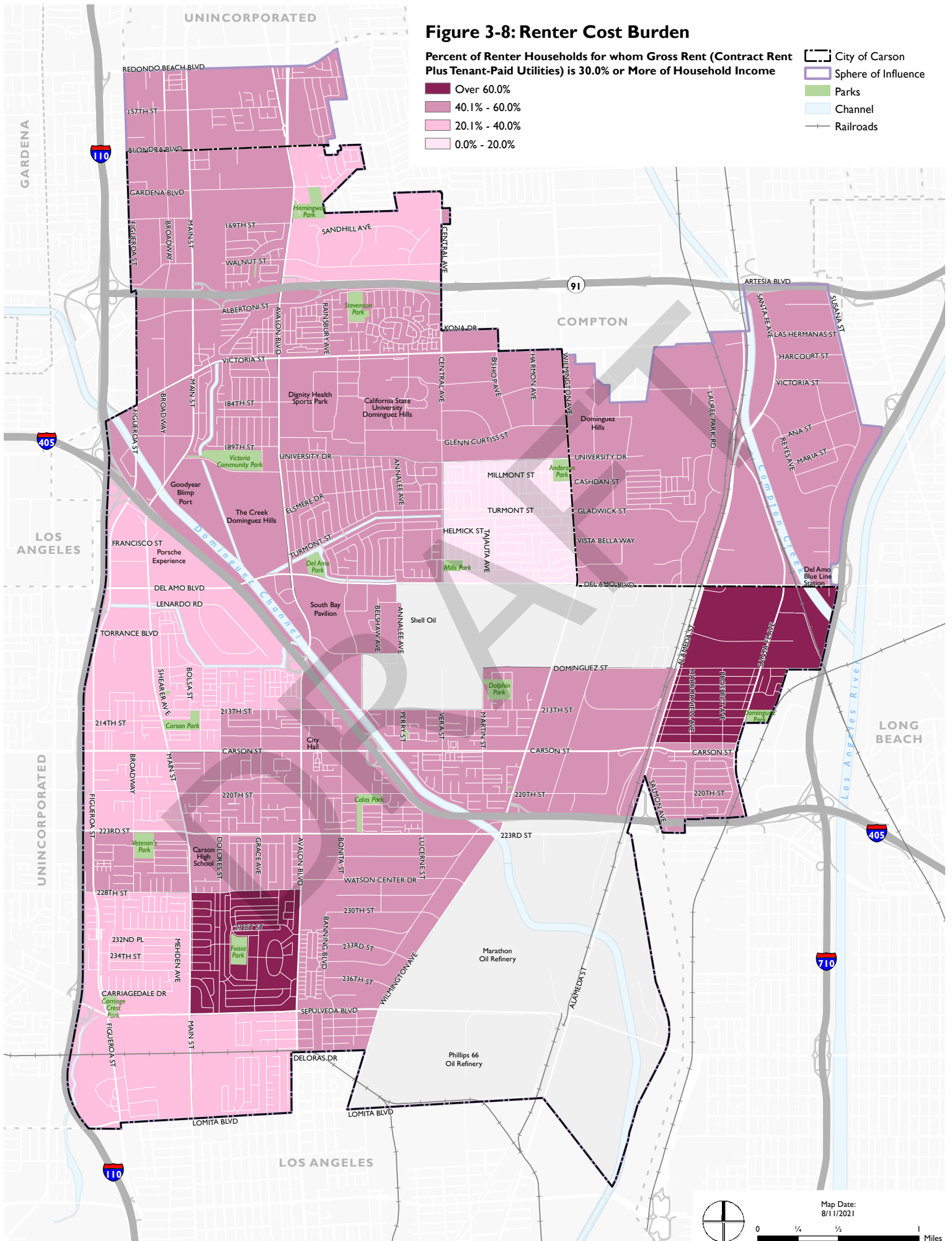
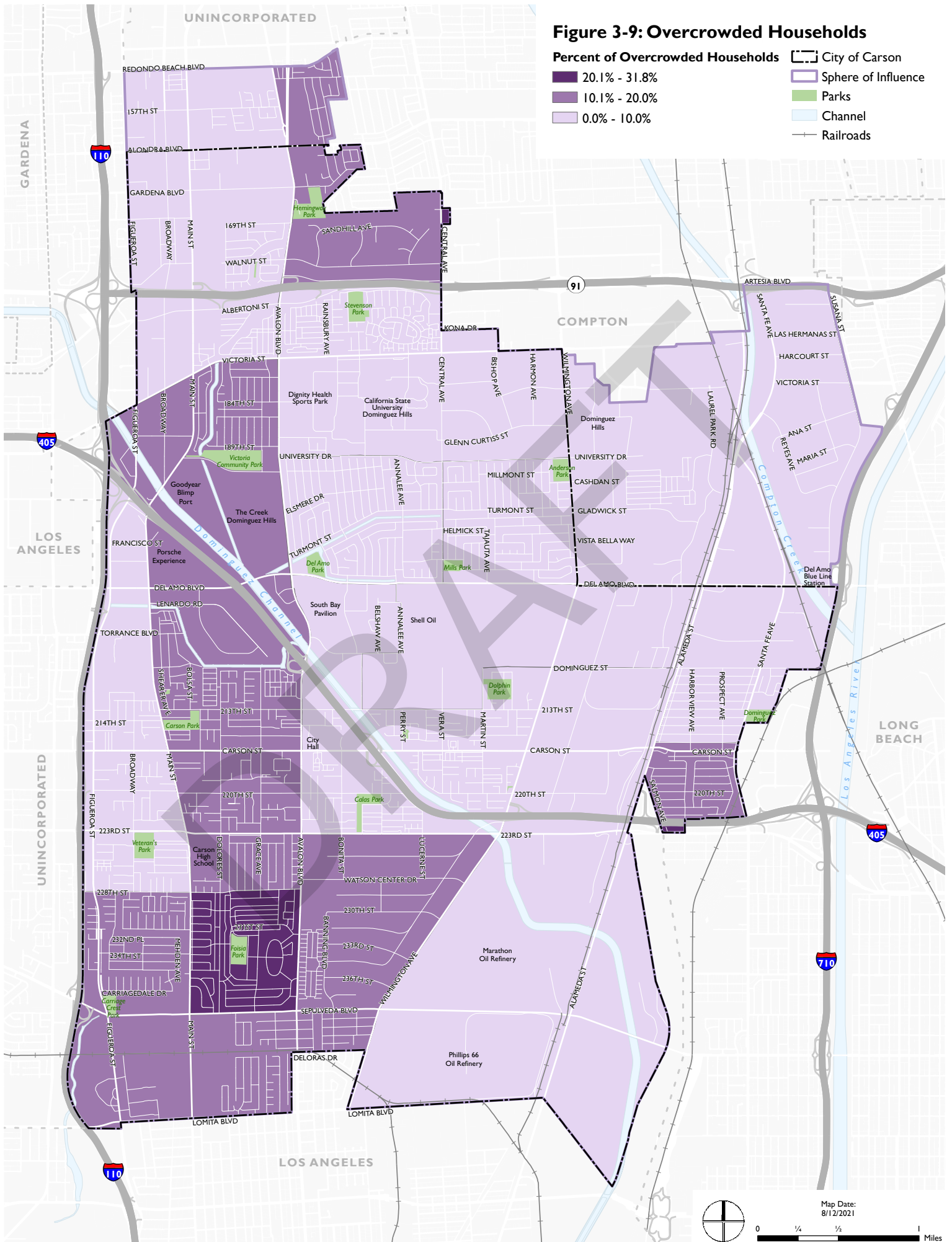
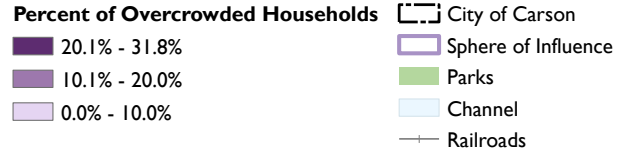


Figure 3-9: Overcrowded Households



Displacement Risk

Increased housing costs have created an affordability gap in Carson, especially for those seeking to own their home. As costs increase, this may disproportionately impact lower-income households and households of color, resulting in displacement. Data provided by the Urban Displacement Project indicate that there are four “sensitive communities” in Carson. Sensitive communities are those with populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. Figure 3-10 shows there are three such tracts in the southern section of the city, bordering Wilmington, while the fourth is in the east bordering Long Beach. There is one tract north of Carson’s borders within the city’s Sphere of Influence. However, much of the land in the easternmost and southernmost tracts contains industrial uses and has a low population density.

As discussed in Chapter 2, home sales prices and rents in Carson have continued to rise in recent years. According to the American Community Survey, monthly median gross rents have increased from \$1,190 in 2010 to \$1,524 in 2019 (28.1 percent increase). In 2019, median gross rent was higher in Carson than in a number of surrounding jurisdictions.. As renters are considerably more cost burdened, they are more likely to experience displacement pressures from even a small increase in rent prices. Since rents are higher in the city than in other comparable jurisdictions, displacement pressures may pose a substantial risk. Further, residents living in mobile home parks may be at particular risk of displacement. The Housing Plan contained in Chapter 6 provides a variety of strategies to preserve affordable housing to reduce this risk.

Figure 3-10: Sensitive Communities in Carson

Source: HCD AFFH Data and Mapping Resources (Urban Displacement Project, 2019)

DRAFT

3.3 Priorities and Goals

In addition to a fair housing assessment, State law requires the identification of priorities and goals to reduce the severity of fair housing issues in a jurisdiction. Further, a jurisdiction must identify contributing factors and assign a priority level to each factor. This section incorporates the conclusions of the 2020 AI and provides updates where necessary.

CONTRIBUTING FACTORS

The City's 2020 AI identified the major contributing factors that are sources for fair housing issues within Carson, along with each factor's level of prioritization. As this chapter has identified the same fair housing issues in Carson since the completion of the 2020 AI, these conclusions are reproduced and updated in Table 3-3 below. High priority indicates "factors that have a direct and substantial impact on fair housing choice," medium priority indicates "factors that have a less direct impact on fair housing choice, or that the City of Carson has limited authority to mandate change," and low priority indicates "factors that have a slight or largely indirect impact on fair housing choice, or that the City of Carson has limited capacity to address."

Table 3-3: City of Carson Contributing Factors

<i>Contributing Factors</i>	<i>Priority</i>	<i>Justification</i>
High levels of segregation	High	Black households have moderate to high levels of segregation when considered on the whole of the City of Carson. This is demonstrated by the Dissimilarity Index. The concentration of Black households was seen primarily in northern Carson.
Insufficient affordable housing in a range of unit sizes	High	Some 34.2 percent of households have cost burdens. This is more significant for renter households, of which 50.4 percent have cost burdens (see Table 2-11). This signifies a lack of housing options that are affordable to a large proportion of the population.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. About 48.0 percent of the population with at least one disability were persons aged 65 and older.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.
Access to School Proficiency	Medium	Black households have lower levels of access to proficient schools in the city. However, the City has little control over impacting access on a large scale.

Table 3-3: City of Carson Contributing Factors

<i>Contributing Factors</i>	<i>Priority</i>	<i>Justification</i>
Discriminatory patterns in lending	Medium	The mortgage denial rates for black households are higher than the jurisdiction average according to 2012-2019 HMDA data.

Source: City of Carson, 2020 AI; Dyett and Bhatia, 2021

ACHIEVEMENTS, GOALS AND ACTIONS

Prior to the 2020 AI, the City had completed an Analysis of Impediments in 2015. That assessment identified eight impediments. The City has made significant progress in reducing or removing those impediments. Fair housing activities undertaken by the City since the 2015 AI are described below:

- Monitoring all housing built prior to 1980 for lead-based paint and other hazardous or structurally unsafe housing issues (for example, the presence of asbestos).
- Monitoring low- to moderate-income housing developments that have existing affordability controls that comprise the inventory of assisted housing units for their risk of conversion to market rate (one project have been identified as being at risk for conversion by 2021, and one is at risk of conversion by 2031).
- Continuing the ongoing effort to combat the incidence of blighted and otherwise substandard housing through a combination of efforts including enforcement, citation, and referral to the City's housing rehabilitation programs. (The City's Code Enforcement Division responds to approximately 2,000 complaints annually).
- Continuing, through the Carson Housing Authority, providing development assistance (in the form of direct financial subsidies to developers, provision of infrastructure, and/or the writing down of land costs) in order to promote the development of affordable multi-family housing.
- Encouraging the development of mixed-use projects in the city, including the development of specific plans that require housing as a key component of the proposed development.
- Increasing the knowledge throughout the community of the availability of fair housing services. The City currently provides a link to the fair housing provider (the Housing Rights Center) on its website and uses the City website to advertise HRC's services. The City also distributes flyers and other written materials at City Hall and at the Congresswoman Juanita Millender-McDonald Community Center regarding HRC's services and the Walk-In Clinics. Written materials regarding HRC's services (flyers, brochures, website announcements) are currently distributed in both English and Spanish.
- Repeal of the City's Residential Property Report (RPR) ordinance. Under that ordinance, approval of transfers of residential property within the city were contingent on a report that included an inspection of the property. That ordinance included an exception for spousal transfers, which the previous AI noted could be viewed as a violation of the California Fair Housing and Employment Act prohibition against differential treatment based on marital status. City Council voted to repeal the entire Residential Property Report ordinance on August 6, 2019, and the repeal became effective on September 20, 2019.

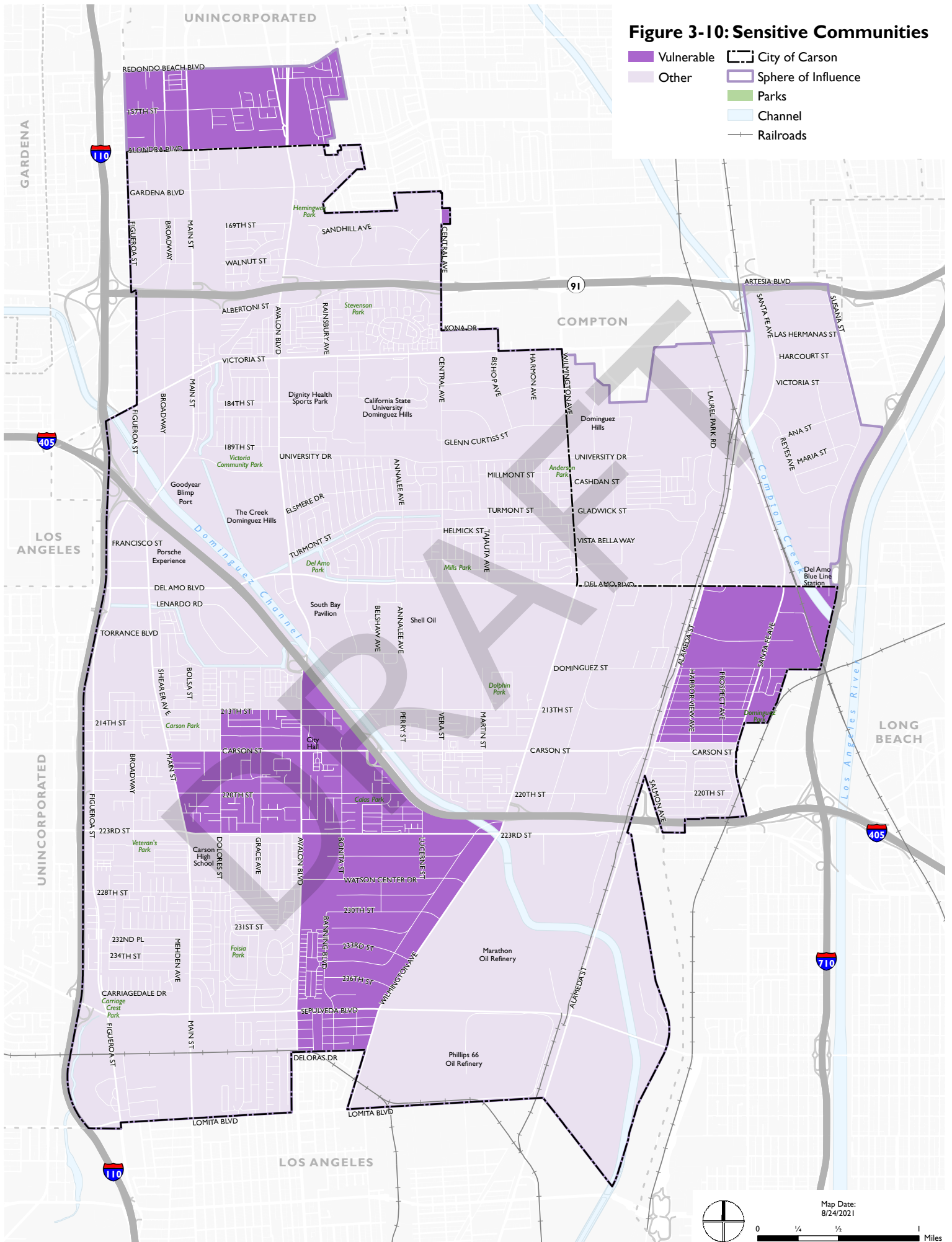
In order to continue to reduce impediments, including those identified in Table 3-3, the 2020 AI outlined a number of specific goals and actions that the City will prioritize to affirmatively further fair housing. These goals and actions are reproduced in Table 3-4, which summarizes fair housing issues/impediments and contributing factors, including metrics, milestones and a timeframe for achievements. These priorities and goals inform the housing plan available in Chapter 6 of this Element.

Table 3-4: Fair Housing Priorities and Goals

<i>Fair Housing Goal</i>	<i>Impediments to Fair Housing Choice/ Contributing Factors</i>	<i>Fair Housing Issue</i>	<i>Recommended Actions</i>
Review zoning and municipal codes for barriers to housing choices	<ul style="list-style-type: none"> • High levels of segregation • Discriminatory patterns in lending 	Segregation	<ul style="list-style-type: none"> • Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years. Record activities annually.
Increase availability of accessible housing	<ul style="list-style-type: none"> • Insufficient accessible affordable housing 	Disability and Access	<ul style="list-style-type: none"> • Review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments over the next five (5) years. Record activities annually.
Promote housing opportunities in high opportunity areas	<ul style="list-style-type: none"> • Insufficient accessible affordable housing 	Disproportionate Housing Need	<ul style="list-style-type: none"> • Continue to use CDBG and HOME funds to fund housing rehabilitation for homeowner and rental housing option 150 residential housing units over five (5) years.
Provide community and service provider knowledge of fair housing	<ul style="list-style-type: none"> • Lack of fair housing infrastructure • Insufficient fair housing education • Insufficient understanding of credit 	Fair Housing Enforcement and Outreach	<ul style="list-style-type: none"> • Continue to promote fair housing education through annual or biannual workshops. Maintain records of activities annually. • Ensure that fair housing education materials are available in the Spanish language. Maintain records of activities annually. • Promote annual outreach and education related to credit for prospective homebuyers. Maintain records of activities annually. • Partner with community agencies to provide financial literacy classes for prospective homebuyers on an annual basis. Maintain records of activities annually.

Source: City of Carson, 2020 AI

Figure 3-10: Sensitive Communities



4 Housing Constraints

State law requires analysis of governmental and non-governmental constraints to Carson meeting its housing needs. Governmental constraints can include zoning regulations, development standards, fees, and processing and permitting times, among others. Non-governmental constraints can include the following areas – infrastructure, environmental, and market. This chapter provides an assessment of such constraints as required by law.

Further, California Government Code Section 65583 requires that the City identify any constraints and impediments to fair housing. Chapter 3 of this Housing Element provides an assessment of fair housing in Carson, including applicable constraints as well as fair housing goals and recommended actions.

4.1 Governmental Constraints

While government regulations are intended to guide development in a community and ensure quality housing, they can also unintentionally contribute to delays or increased development costs. Actions taken by the City can thus have an impact on both the overall affordability of housing as well as its availability within the City. Governmental constraints that could lead to such cost increases include land use controls, site improvement requirements, building codes, fees, and other locals programs to improve the overall quality of housing.

The following section assesses constraints imposed by the current General Plan and Zoning Ordinance. The City has initiated a process to update its Zoning Code, both for consistency with the General Plan Update, as well as to bring the Code up to contemporary practices and standards. As such, the ongoing updates to the General Plan and subsequent Zoning Code will rectify constraints as appropriate. A brief introduction of proposed land uses in the General Plan Update is presented below. Housing programs are included in Chapter 6 of this Housing Element to describe actions to ameliorate any governmental constraints.

DRAFT GENERAL PLAN UPDATE

The City of Carson last updated its General Plan in 2004 and is in the process of updating it again to reflect opportunities, challenges, and approaches that have emerged in recent years. This General Plan Update is a comprehensive reexamination of Carson's planning context and the community's vision and involved close collaboration with Carson residents and elected officials in a variety of forums to ensure that the Plan closely reflects the community's goals and priorities through the Plan's 2040 planning horizon. As the General Plan Update is being prepared in parallel with this

Housing Element, its policy direction and shared goals inform the assessment of constraints in this chapter.

The Vision Statement of the General Plan Update declares that “Carson in 2040 is a vibrant, diverse, and energetic place that embraces technology, creativity, and innovation. Residents have access to quality jobs, housing, education, services and a fiscally-sound government. Businesses have access to infrastructure, investment, workforce training, and a collaborative environment. The community is filled with thriving neighborhoods and strategically located new development with inviting spaces for working, living, learning, dining, gathering, and recreation.”

To achieve these ends, the Draft General Plan concentrates new development in the downtown core, in centers outside the core, and expanding on the energy and success of recent corridor development such as that along Carson Street. These centers will contain a mix of uses around major streets, including housing, employment, and neighborhood commercial uses. Corridors between the centers will have enhanced landscaping, including street trees, pedestrian-scale lighting, and buffered bikeways where feasible.

To facilitate the realization of development goals and priorities, there are a variety of proposed land use designations in the General Plan update. Three residential land use classifications are established to provide for development of a range of housing types – Low Density Residential (LDR), Medium Density Residential (MDR) and High Density Residential (HDR). The Mixed Use designation is intended to accommodate high-intensity active uses and mixed-use development, and three mixed-use designations are established – Downtown Mixed Use (DMU), Corridor Mixed Use (CMU) and Business Residential Mixed Use (BRMU). Finally, the Flex District (FLX) designation permits a wide range of uses, including conditionally permitted residential uses as part of a cohesive plan that considers the long-term development potential of adjacent properties and present a strategy for transition of industrial uses to residential uses. It is these land use designations that are used to determine development capacity in the sites inventory. Density and development intensity standards for each land use designation that permits residential development are available in Table 4-1.

Table 4-1: Standards for Density and Development Intensity

<i>Land Use Designation</i>	<i>Base Density/Intensity¹</i>		
	<i>Base Residential Intensity²</i>	<i>Floor Area Ratio (FAR; for all uses combined, including residential and non-residential)</i>	<i>Maximum Increase in Residential Density/FAR with Community Benefits³</i>
Residential			
Low Density	up to 10	up to 0.55	-
Medium Density	10 to 18	None specified	20%
High Density	18 to 30 (18 to 40 for sites larger than two acres)	None specified	40%
Mixed Use			
Downtown Mixed Use	up to 40	up to 1.5 (active commercial frontage required) ⁴	40% (60% when combined with Active Commercial uses)
Corridor Mixed Use	up to 30	up to 1.0 ⁴	30% ⁵
Business Residential Mixed Use	up to 50	up to 1.0	40%
Flex District	up to 40	up to 1.0	40%

1. State-mandated density bonuses for affordable housing are in addition to densities otherwise permitted. The bonuses would be applied to the base density/intensity for the land use classification.

2. Density is measured in housing units per net acre of site area.

3. Method for determining community benefits bonus to be established in the Carson Municipal Code. Community benefits bonus would apply to base density/FAR.

4. Building area devoted to active commercial uses at the ground level is exempt from FAR calculations.

5. Residential density increase of up to 15 units per acre available for active commercial uses.

Source: City of Carson, Land-use Classifications

EXISTING DEVELOPMENT REGULATIONS

Article IX, Planning and Zoning, of the Carson Municipal Code includes a variety of development regulations, most of which affect the type, availability, location, and cost of housing. These include Chapter 1, Zoning; Chapter 2, Subdivision Regulations; Chapter 3, Standards and Criteria for Residential Condominiums; and Chapter 4, Density Bonus Provisions for Residential Units. All of these regulations must be consistent with the General Plan and proposed revisions to the Housing Element. Government Code 65583 (c)(1)(A) states that rezoning for jurisdictions with an eight-year housing planning period must be completed "no later than three years after either the date the housing element is adopted ...or 90 days after receipt of comments from the department, whichever is earlier." To fulfill this requirement, the General Plan Update will identify new zones to implement General Plan policies.

Land Use and Zoning

The current General Plan outlines four broad land use categories – Residential, Commercial, Industrial, and Other. Residential development is permitted in the Residential and Other categories, including mixed use designations. Residential designations include Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), and Urban Residential (UR). Other designations that allow residential development include Mixed Use-Residential (MUR). As previously noted, land use designations will be changed with the General Plan Update to reflect changed conditions in the city. Neighborhood integration and flexible uses, including for residential, are central to this Update.

The existing Carson Zoning Ordinance (Carson Municipal Code Article IX, Chapter 1) establishes several residential zones in order to accommodate a variety of housing types and densities. The existing Code does not allow residential development in any commercial zones except for two mixed-use commercial districts: Mixed-Use Carson Street (MU-CS) and Mixed-Use Sepulveda Boulevard (MU-SB). Taken together, the zones within City limits (i.e., RA, RS, RM, MU-CS and MU-SB) where residential development is allowed constitute about 25.8 percent of the city's total acreage. Further, as previously noted, new zones will be identified following the adoption of the General Plan Update. This will likely alter the proportion of citywide land that is suitable for residential development. For instance, considering the proposed land use designations of the Update (i.e., including all Residential, Mixed Use, and Flex District designations), nearly 39.7 percent of the total acreage of the city and its Sphere of Influence (SOI) will be open to residential development.

The City's Zoning Ordinance also establishes overlay districts in the City in order to accomplish additional purposes within existing zones, including residential uses. Carson's Zoning Ordinance only applies within City limits, whereas its SOI is under Los Angeles County zoning regulations. City residential and mixed-use residential zones and overlay districts are as follows:

- Residential, Single Family (RS) Zone: This zone was created for the establishment, expansion and preservation of residential areas which are to be developed with single-family detached dwellings and such other activities considered harmonious with such low-density residential development.
- Residential, Multiple Dwelling (RM) Zone: This zone was created for the establishment, expansion and preservation of residential areas, which are to be developed with multiple dwellings or combinations of single-family and multiple-unit dwellings, and such other activities considered harmonious with such medium- and high-density residential development.
- Residential Agriculture (RA) Zone: This zone was created for single-family residential uses together with compatible crop cultivation and related agricultural activities on land which is not yet fully utilized for residential purposes.
- Mixed-Use – Carson Street (MU-CS) Zone: This zone was created primarily to create a downtown retail and residential district which will provide a distinctive core area along Carson Street which includes the Civic Center. This designation provides for pedestrian-

oriented, mixed-use (commercial/residential) development which may include market rate, affordable or senior housing and transit-oriented development.

- **Mixed-Use – Sepulveda Boulevard (MU-SB) Zone:** This zone was created primarily to create a retail, office and residential district along the south side of Sepulveda Boulevard two hundred forty (240) feet east of Marbella Avenue and four hundred (400) feet west of Avalon Street. This designation provides for mixed-use (commercial/residential) development which may include market rate, affordable or senior housing development, residential or commercial development. The lots are very shallow in this area which makes conventional development difficult. The purpose of this zone is to create the flexibility needed to develop a vibrant residential/commercial corridor.
- **Mixed-Use Residential (MUR) Overlay District:** This designation was created to provide for pedestrian-oriented, mixed-use (commercial/residential) development, and high-density residential development which may include market rate, affordable or senior housing, within designated areas in commercial zones.

Development Standards

Existing development controls, such as for setbacks, lot area, frontage, height, private open space, are shown in Table 4-2. Carson's residential areas are characterized by smaller lots and low building heights, even for multifamily zones, ranging from 30 to 55 feet. Portions of the SOI governed by County zoning have the same minimum lot size of 5,000 square feet, but a slightly taller maximum building height of 35 feet, compared to the city's 30 feet.

Mixed-use and residential developments located within the Carson Street and Sepulveda Boulevard areas are permitted up to 3 stories or 45 feet, with even taller structures allowed if affordable or senior housing is provided. Maximum lot coverages are only defined for multi-family zones. These minimum lot sizes are also much larger, ranging from 10,000 to 30,000 square feet. In general, current citywide residential zoning regulations encourage low- to medium-density development, such as single-family residential or two- to three-story townhomes, and limit building heights outside the Mixed-Use zones to a maximum of 30 feet, except for 55-foot (four stories) affordable and/or senior citizen projects without Planning Commission approval.

The City allows deviations from the development standards for projects that contain affordable or senior units, with the percentage density bonus dependent on the proportion of planned affordable housing units, in coordination with State law. In addition to density bonuses, the Planning Commission may grant such deviations as it deems necessary while evaluating the overall impact and design of the project, such as those related to parking or other site requirements. Additional information about density bonus provisions is provided in the Density Bonus Ordinance subsection below.

Table 4-2: Residential Development Standards

Zone/Overlay District	Land Use Category	Minimum Lot Size	Setbacks			Maximum Height	Other Requirements
			Front	Rear	Side		
City of Carson							
Residential, Agricultural (RA)	Low Density Residential	5,000 sq. ft.	20'	15'	3' to 5'	30' ¹	Open Space: 130 to 150 sq. ft.
Residential, Single-Family (RS)	Low Density Residential	5,000 sq. ft.	20'	15'	3' to 5'	30' ¹	Open Space: 130 to 150 sq. ft.
Residential, Multi-Family (RM-8)	Low Density Residential	5,000 sq. ft.	20'	15'	6' to 10'	30' ¹	Open Space: 30%-40% net project area Max Lot Coverage: 40% ²
Residential, Multi-Family (RM-12)	Medium Density Residential	5,000 sq. ft.	20'	15'	6' to 10'	30' ¹	Open Space: 30%-40% net project area Max Lot Coverage: 40% ²
Residential, Multi-Family (RM-25)	High Density Residential	5,000 sq. ft.	20'	15'	6' to 10'	30' ¹	Open Space: 30%-40% net project area Max Lot Coverage: 40% ²
Mixed-Use – Carson Street (MU-CS)	Mixed-Use Residential	20,000 to 30,000 sq. ft.	10'	15' to 30'	10'	45' (3 stories) ^{3,4}	Max FAR: 1.5 Frontage: 70% of lot width (min)
Mixed-Use – Sepulveda Boulevard (MU-SB)	Mixed-Use Residential	10,000 to 15,000 sq. ft.	5' to 10'	5' to 10'	5'	45' (3 stories)	Max FAR: 1.5 Frontage: 70% of lot width (min)
Mixed-Use Residential (MUR)	Mixed-Use Residential	20,000 to 30,000 sq. ft.	-	-	-	45' (3 stories) ³	Max FAR: 1.5 Frontage: 100' (min)
Los Angeles County (Applies within Sphere of Influence)							
Single Family Residence (R-1)	-	5,000 sq. ft.	20'	15'	5'	35'	-

Table 4-2: Residential Development Standards

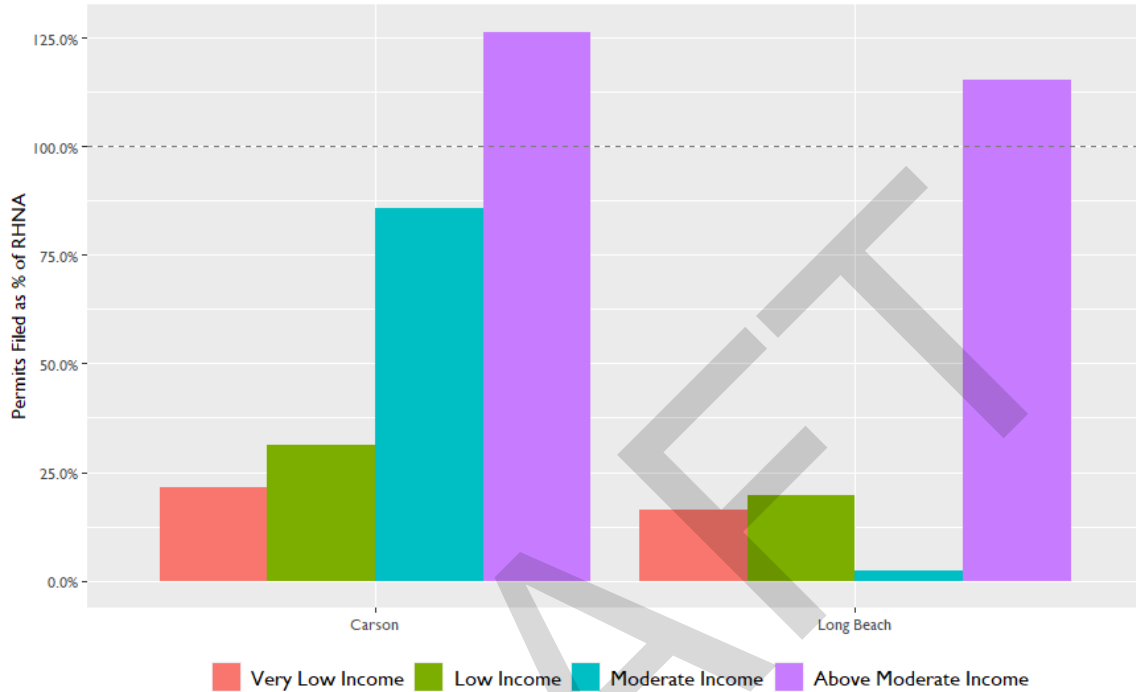
Zone/Overlay District	Land Use Category	Minimum Lot Size	Setbacks			Maximum Height	Other Requirements
			Front	Rear	Side		
Limited Multiple Residence (R-3)	-	5,000 sq. ft.	15'	15'	5'	35'	-
Heavy Agriculture (A-2)	-	10,000 sq. ft.	20'	15'	5'	35'	-

1. Measured from average grade.
2. Exception for a parking structure or subterranean parking, where the ground area shall not exceed 70% of the net lot area.
3. 55-foot building (four stories) permitted for affordable and/or senior citizen projects.
4. Height exceptions may be granted for building-mounted architectural features if an exceptional design has been determined by the Planning Commission.

Source: City of Carson, Carson Municipal Code Article IX, Part 2 Residential Zones, Division 5 Site Requirements and Division 6 Site Development Standards, and Part 3 Commercial Zones, Division 5 Site Requirements and Division 6 Site Development Standards; Los Angeles County, Los Angeles County Zoning Ordinance (unincorporated area)

Development standards may pose a constraint if they place an undue burden on development or make development less feasible in a jurisdiction. For instance, a survey of peer city and county standards demonstrate that maximum building heights in multifamily zones are higher in Compton, Torrance and unincorporated areas of Los Angeles County than is allowed in Carson. Further, during stakeholder outreach, developers indicated that Carson's private open space requirements were excessive. Affordable housing developers also indicated that additional density allowances would help facilitate the development of affordable housing. Differences in standards can make development of higher density multifamily buildings, which tend to be more affordable, less attractive. However, Carson's standards have not hindered the development of housing at any income level. Chart 4-1 highlights building permits as a proportion of RHNA between 2014 and 2020, showing that development in Carson has been on par with or better than that of the neighboring jurisdiction of Long Beach. During this period, Carson has permitted 178 low- and very low-income units, 240 moderate-income units, and 895 above moderate-income units.

Chart 4-1: Building Permits as a Proportion of RHNA, 2014-2020



Source: City of Carson, 2020 Annual Progress Report; City of Long Beach, 2020 Annual Progress Report

Any standards that may limit development will be ameliorated in the updates to the General Plan and Zoning Code. For instance, proposed building heights in the High-Density Residential designation are higher than existing standards – the typical maximum building height will be 40 feet. Further, the Downtown and Business Residential Mixed Use designations will increase the base maximum height to 55 feet (and up to 85 feet with the inclusion of community benefits). Other proposed development standards are available in Table 4-1.

Building Code

The City of Carson has adopted the 2019 California Building Standards Code, California Code of Regulations, Title 24 with amendments. Local amendments are based on climatic, geological or topographical conditions, and are generally for the purpose of protecting public health and safety. These amendments do not substantially differ from other those of neighboring jurisdictions and thus are not likely to pose an impediment to the development or provision of housing.

Parking Requirements

Residential parking requirements in Carson are presented in Table 4-3. In general, both multifamily and single-family uses require two covered spaces (not including mixed-use exceptions).

Parking requirements in Carson, particularly for multifamily and single-family uses, are generally comparable to those of surrounding jurisdictions. Furthermore, Carson’s average household size

(3.51 persons per households in 2021 according to the California Department of Finance) is much higher than the Los Angeles County countywide average (2.88 for all incorporated areas) as well as adjacent communities of Torrance (2.57) or Long Beach (2.77). Thus, if anything, parking standards in Carson are less restrictive than those in surrounding communities. During outreach, some stakeholders noted that it can be difficult to develop structured parking for higher density mixed-use projects. Although in the long-term lower parking standards would be preferable, stakeholders also generally agreed that current parking regulations did not pose a significant constraint in Carson.

As part of the Zoning Code Update, the City will explore potential changes to its parking requirements, including potentially requiring one space for studio and one-bedroom units, and 1.5 spaces for two-bedroom units, as some neighboring cities (such as the City of Long Beach in its RM zone with requirements of 1.5 spaces per unit) are presently doing. The City will also consider allowing tandem parking where the spaces are for a single unit. Further, as it relates to density bonus provisions, recent amendments to the State Density Bonus Law per AB 2345 have decreased the maximum parking ratio to further encourage affordable development.

These efforts are included in Program 5 of the Housing Action Plan (Chapter 6). Parking standards for Accessory Dwelling Units (called Second Dwelling Units in Table 4-3) are currently being revised to be consistent with recent amendments to the State Government Code.

Table 4-3: City of Carson Residential Parking Requirements

Use	Off-Street Parking Required
Residential	
Single-family dwelling in the RS Zone, RA Zone.	2 spaces within a garage.
Single-family dwelling in the RM Zone.	2 spaces within either a garage or carport.
Multiple-family dwelling.	2 spaces within either a garage dwelling or carport for each dwelling unit. In addition, 1 guest parking space for every 1 multifamily unit with 3 bedrooms or more and 1 guest parking space for every 2 multifamily units with 2 bedrooms or less.
<i>Multiple-family dwelling within a Mixed-Use (MU) District.</i>	1 covered space for every studio unit. 2 covered spaces for each unit with 1 or more bedrooms. 1 guest space for every 4 units.
<i>Live/work rental units within a Mixed-Use (MU) District.</i>	2 spaces per unit for units under 2,500 square feet. Larger units require 2 spaces for residential plus the number of spaces required by this Section for commercial activities. 1 guest space for every 4 units.
Condominium.	2 spaces within a garage for each dwelling unit. In addition, 1 guest parking space for every 1 multifamily unit with 3 bedrooms or more and 1 guest parking space for every 2 multifamily units with 2 bedrooms or less.

Table 4-3: City of Carson Residential Parking Requirements

<i>Use</i>	<i>Off-Street Parking Required</i>
<i>Condominiums within a Mixed-Use (MU) District.</i>	1 covered space for every studio unit. 2 covered spaces for each unit with 1 or more bedrooms. 1 guest space for every 4 units.
<i>Live/work rental units within a Mixed-Use (MU) District.</i>	2 spaces per unit for units under 2,500 square feet. Larger units require 2 spaces for residential plus the number of spaces required by this Section for commercial activities. 1 guest space for every 4 units.
Mobile home park.	2 spaces for each mobile home (tandem parking permitted), plus 1 guest parking space for each 4 mobile homes.
Convent, rectory, monastery and other group quarters for members of a religious order.	1 space for each 3 rooming units.
Boarding or rooming house, fraternity or sorority house, dormitory.	1 space for each 2 rooming units.
Caretaker's residence.	1 space for each residence.
Retirement home, senior citizens' housing (units without kitchens and not defined as a community care facility).	1 space for each rooming unit, plus 2 spaces for each resident employee. (The parking area to be improved shall be 1 space for each 2 rooming units, plus 2 spaces for each resident employee. The difference between the required parking area and the parking to be improved shall be held as open space reserve to meet additional parking needs or required parking in case of conversion to another use.)
Retirement home, senior citizens' housing (units with kitchens, and not defined as a community care facility).	2 spaces for each dwelling unit, plus 2 spaces for each resident employee. (The parking area to be improved shall be 1 space for each 2 dwelling units, plus 2 spaces for each resident employee. The difference between the required parking area and the parking to be improved shall be held as open space reserve to meet additional parking needs or required parking in case of conversion to another use.)
Residential hotel without kitchens.	1 space for each rooming unit, plus 2 spaces for each resident employee.
Residential hotel or motel with kitchens.	2 spaces for each unit.
Second dwelling unit.	
<i>Studio</i>	1 uncovered off-street parking space outside of front yard setback area.
<i>1 bedroom</i>	1 space within either a garage or carport. Minimum interior dimension for a one car garage shall be 10 feet wide by 20 feet long and 9 feet wide by 20 feet long for a one car carport.

Table 4-3: City of Carson Residential Parking Requirements

<i>Use</i>	<i>Off-Street Parking Required</i>
2 bedrooms or unit size exceeding 700 square feet	2 spaces within a garage.
Institutional	
Small family home community care facility in the RS Zone.	2 spaces within a garage.
Small family home community care facility in RM Zone.	2 spaces within either a garage or carport.
Other community care facilities.	Required parking spaces to be determined for each conditional use permit based primarily upon the facility's licensed capacity, type of care and number of employees.

Source: City of Carson, Carson Municipal Code Section 9162.21 Parking Spaces Required

On- and Off-Site Requirements

On- and off-site improvements may be required in conjunction with development based on the location of a project and existing infrastructure. The City's standards and requirements for streets, sidewalks, and other site improvements are found in the Municipal Code. Per Section 9161.4 of the Zoning Ordinance, any new development prior to issuance of a building permit is required to install, construct or otherwise provide for the following improvements: pavement, curbs, gutters, sidewalks, drainage facilities, sewer facilities, water facilities, lighting, traffic signals, signing, striping, median improvements, parkway trees and landscaping, grading of right-of-way, right-of-way dedication, noise attenuation barriers, modifications to existing utilities to facilitate any or all of the improvements identified herein, and repairs to any or all of the improvements identified herein. Other improvements may be required if the Director of Public Works deems that they are necessary to protect the public health, safety and welfare. The estimated cost of such improvements must be less than 50 percent of the valuation of the building.

Parkway trees are required for any new construction with a building permit valued in excess of \$10,000. Trees must be planted in the parkway strip. The total estimated cost of the parkway tree requirement cannot exceed 30 percent of the estimated value of the improvements provided.

New subdivisions may require dedications, easements, construction of streets and alleys, and other improvements to maintain public safety and convenience, consistent with the Subdivision Map Act. Improvements required to be installed or agreed to be installed by a subdivider as a condition prior to filing of a tract or parcel map shall comply with the requirements outlined in Article IX, Chapter 2, Part 6. These improvements shall be in accordance with the conditions of approval of the tentative map and in accordance with any agreement made or bond entered into by the subdivider for that purpose. These improvements shall be in accordance with the standards and specifications set by administrative regulations and ordinances of the City of Carson and to the satisfaction of the Director of Public Works.

A typical street requires 60 feet total width comprised of 36 feet of street width and 12 feet of right-of-way on either side. The following summarizes the City's standards for roadway and right-of-way widths.

- Residential entrance streets through collector streets, streets adjacent to schools, and multiple residential use streets – 64 feet total width (40 feet street width and 12 feet of right-of-way on both sides).
- Interior collector and local streets, cul-de-sac streets, and loop streets – 60 feet total width (36 feet of street width and 12 feet of right-of-way on both sides).
- Alleys – 30 feet total width.

The cost of these improvements ultimately increases the cost of new housing units, which may constrain the development of affordable housing in Carson. However, these requirements do not significantly differ from those of other jurisdictions in Los Angeles County and have not been identified as constraints by developers in Carson. While such improvements increase housing costs, they are necessary to maintain neighborhood quality and ensure adequate levels of public services and facilities. As most development in Carson occurs on previously developed and subdivided land, requirements related to new roadways and subdivision do not pose a major constraint. The cost of upgrades to existing infrastructure may only be imposed on new development when project impacts will result in need for additional capacity. Any such improvements will also cost significantly less than those required for undeveloped parcels.

Subdivision Regulations

Pursuant to the provisions of the Subdivision Map Act, as well as other related State laws, the City of Carson has adopted a Subdivision Ordinance. The Subdivision Ordinance is contained in Article IX, Chapter 2 of the Municipal Code. The Ordinance has been amended a few times since re-adoption in 1980, with all amendments related to mobile-home park residential conversions. Unlike neighboring jurisdictions, including Long Beach, Compton and Los Angeles County, the Subdivision Ordinance is a chapter contained within the Zoning Ordinance. In the previous five years, as of 2021, five residential subdivisions have occurred in the city. Four of the subdivisions were owner-occupied housing, while one was for subsidized housing.

Subdivision regulations must remain consistent with the General Plan. This includes allowing for and facilitating all types of housing. Unlike Los Angeles County, the Carson Subdivision Ordinance maintains a 5,000 square foot minimum lot size or whatever the required area is pursuant to the particular zone. This is relatively large and may impede the development of affordable housing. Efforts to remove zoning constraints are included in Program 5 of the Housing Action Plan.

Residential Condominium Standards

Standards for the development of residential condominiums are established in Article IX, Chapter 3 of the Carson Municipal Code. Per these standards, residential condominiums have separate development requirements than multifamily residential apartments. Like other multifamily projects, residential condominiums are only permitted in RM zones with a conditional use permit.

(CUP) and do not have set objective development criteria. Further, any exterior modifications, excluding incidental maintenance, to a condominium requires a modification of their CUP.

Many of the established standards for condominiums are duplicative of those for other multifamily apartments. For instance, a minimum of 150 square feet of private open space (130 square feet for one-bedroom units) and 200 cubic feet of private storage space is required for both. Utility, vibration, and noise attenuation standards are also duplicative. While both require two off-street parking spaces for each unit, condominiums require one visitor space for every 10 units and other multifamily apartments require one guest space for every unit with three or more bedrooms and one guest space for every two units with two or less bedrooms. There is also a 30 percent cap on the number of compact vehicle spaces allowed in multifamily apartments. Further, the requirement of a CUP for exterior modifications only applies to residential condominiums.

The City employs separate and distinct development standards for residential condominiums and multi-family apartment projects despite the fact that both have identical construction requirements. Some of the development standards outlined in Article IX, Chapter 3 are overlapping multifamily while some are distinct requirements (i.e., differing guest parking requirements). The overlapping standards may cause confusion while the distinct standards create restrictions for residential condominiums. During outreach for this Housing Element, developers in Carson have indicated that these separate standards pose a constraint to development. Further, none of Carson's peer cities, including Long Beach, Compton and Torrance, maintain separate residential condominium and multifamily apartment development standards.

All multifamily development, regardless of ownership type, should be subject to the same development standards. However, the City may have a valid interest in maintaining restrictions on condominium conversions, in which case a CUP would be an appropriate tool. Program 5 outlines the efforts the City will take to simplify the Zoning Code and ensure equivalent standards and explore the implementation of new condominium conversion standards.

Similar to other multifamily developments, the requirement for approval of a CUP for residential condominiums that meet all objective development standards is a constraint. Moreover, imposing such a requirement on a project that includes affordable units and otherwise complies with all standards may violate State law. Further, there are no provisions to accommodate density bonuses. Finally, any alterations or upgrades required to bring a unit up to current standards should not require a CUP unless doing so involves a nonconforming structure or use. The City will address both CUP and density bonus related constraints during the update to the Zoning Code, identified as Programs 5 and 7 in the Housing Action Plan, to bring the City's regulations into compliance with State law.

Density Bonus Ordinance

In order to encourage the production of affordable housing, projects are subject to both City and State density bonus requirements. According to the State Density Bonus Law (Government Code 65915), a project may be allowed a density bonus between five and 35 percent above the base maximum density. Recent State law further increased density bonus provisions, including additional non-density concessions, dependent on higher proportions of affordable units. Jurisdictions may allow local density bonuses that exceed those required under State law. Article

IX, Chapter 4 of the Carson Municipal Code, which codifies the State density bonus requirements, has not been updated to meet the most recent changes to State law. While these requirements apply regardless of local ordinances, the outdated language in the Municipal Code may serve as a constraint if the discrepancies create confusion or discourage developers from applying. Table 4-4 provides a summary of the City's current density bonus provisions. Program 7 outlines efforts the City will take to ensure that density bonus provisions conform to current standards during the update to the Zoning Code.

Table 4-4: City of Carson Density Bonus Summary¹

<i>Types of Affordable Units Providing Eligibility for a Density Bonus</i>	<i>Minimum %</i>	<i>Bonus Granted</i>	<i>Additional Bonus for Each 1% Increase in Affordable Units</i>	<i>% Affordable Units Required for Maximum 35% Bonus</i>
Affordable Housing				
<i>Very low income</i>	5%	20%	2.5%	11%
<i>Lower income</i>	10%	20%	1.5%	20%
<i>Moderate income (ownership units only)</i>	10%	5%	1%	40%
Senior citizen housing	Qualified senior citizen housing development	20% of the senior citizen housing units	—	—
Land donation for very low income housing	Land donated can accommodate 10% of market rate units, plus housing development qualifies for density bonus as an affordable or senior project.	15%	1%	30% of market-rate units (assuming housing development provides 5% very low income units)
Condominium Conversion				
<i>Lower income</i>	15%	25% ²	—	—
<i>Low/Moderate income</i>	33%	25% ²	—	—
Child care facility	Housing development qualifies for density bonus as an affordable or senior project.	Sq. ft. in child care facility ²	—	—

1. A density bonus may be selected from only one category, except that bonuses for land donation may be combined with others, up to a maximum of 35%, and an additional sq. ft. bonus may be granted for a child care facility.

2. Maximum of 25% bonus for condominium conversions, or an incentive of equal value, at the City's option.

Source: City of Carson, Carson Municipal Code Section 9406 General Provisions Governing Density Bonus Calculations

PROVISIONS FOR A VARIETY OF HOUSING TYPES

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all income levels, including multi-family rental housing, factory-built housing, mobile homes, emergency shelters, and transitional housing. The following sections describe the City's provisions for these types of housing through its land use controls. A summary of housing types permitted in each zone is available in Table 4-5.

Table 4-5: Housing Types Permitted

<i>Housing Types Permitted</i>	<i>Residential Zones</i>			<i>Mixed Use Zones</i>	
	<i>RA</i>	<i>RS</i>	<i>RM</i>	<i>MU-CS</i>	<i>MU-SB</i>
Single-Family	X	X	X		
Multifamily			C	C	C
Condominiums			C	C	C
Second Units		X			
Mobile Home Parks	C	C	C	C	
Live/Work				C	C
Single Room Occupancy (SRO)			X	X	X
Residential Community Care Facility ¹			C	C	C
Small Family Home Community Care Facility ²	X	X	X		
Emergency Shelters	Emergency shelters are permitted in the "ML" (Manufacturing Light) zone and "MH" (Manufacturing Heavy) zone; provided, that all of the requirements and development standards set forth below are satisfied. Any emergency shelter with a capacity greater than thirty (30) occupants shall also be subject to the approval of a conditional use permit.				
Supportive Housing	X	X	X	X	X
Transitional Housing	X	X	X	X	X
Boarding and Rooming Houses			C		

X – Indicates automatically permitted use, or automatically permitted use subject to district requirements.

C – Indicates permitted use upon approval of a Conditional Use Permit.

1. Any family home, group care facility or similar facility for twenty-four (24) hour a day nonmedical care of persons in need of personal services, supervision or assistance essential for sustaining the activities of daily living or for the protection of the individual (California Health and Safety Code, Section 1502(a)). Small Family Home Community Care Facilities are included in this definition.

2. A residential community care facility which is the family residence of the licensee in which care and supervision are provided for not more than six (6) persons, exclusive of members of the licensee's family.

Source: City of Carson, Carson Municipal Code Sections 9121.1 Uses Permitted and 9131.1 Uses Permitted

Multifamily Residential Housing

Multifamily housing comprises 13.0 percent of the city's existing housing stock (as of 2021). The proportion of overall multifamily housing in the city is expected to increase significantly in the coming years as a majority of new development is expected to be in the higher density and mixed-use designations established in the 2040 General Plan (i.e., the MDR, HDR, CMU, DMU, BRMU, and FLX designations).

Multifamily housing (i.e., apartments and condominiums) require a Conditional Use Permit (CUP) in all zones that permit such development. Further, as noted earlier, existing regulations distinguish between multifamily rental and owner-occupied housing. The requirement of a CUP is a constraint and is discussed further in the Processing and Permit Procedures section below.

Various Specific Plans allow by right development of multifamily residential units. Carson's recent Specific Plans include:

- The Sepulveda and Panama Specific Plan (2015): The Sepulveda and Panama Specific Plan pertains to a mixed-use project on a site along Sepulveda Boulevard at the terminus of Panama Street. The project will consist of 65 senior apartment units, 3,000 square feet of ground floor commercial uses, and a 28,000-square foot structured parking garage. The site will feature a 1,000-square foot public plaza. Construction on the site completed in December 2018.
- The District at South Bay Specific Plan (2018): The District at South Bay Specific Plan was originally adopted in 2006 and amended in 2011. It was previously called the Carson Marketplace Specific Plan and the Boulevards at South Bay Specific Plan. The Planning Area is a 168-acre site, 157 acres of which are a former landfill which closed in 1965. The Specific Plan details mixed-use development on the site, including 1.83 million square feet of commercial uses; a 350-room hotel; and up to 1,550 multifamily residential units.
- The Birch Specific Plan (2019): The Birch Specific Plan is a multifamily residential development project that consists of 32 residential condominium units. The project will have a maximum of 98,500 square feet of total floor area (including 3,000 square feet of ground floor parking), with on-grade parking and three levels of residential units above. The project will include 74 total parking spaces (including 10 guest spaces). The site is located on S Figueroa St. south of the intersection of Figueroa St. and Carson St., within the High Density Residential zoning district.
- Union South Bay (2020): Union South Bay, formerly known as the Avalon Specific Plan, is a mixed-use project at the northwest intersection of Avalon Boulevard and Carson Street, across from City Hall. The project was completed in 2020, and consists of 357 apartments, 32,000 square feet of ground floor commercial uses, and a 10,000-square foot plaza. The project includes 749 parking units to located in above ground garages and a subterranean level. The apartments were recently converted to workforce housing affordable to moderate-income households.

Mixed-Use Projects

The City of Carson has seen extensive new mixed-use development in its core area in recent years. Mixed-use projects in the Carson Street (MU-CS) Zone and the Sepulveda Boulevard (MU-SB) Zone are required to maintain a maximum floor area ratio (FAR) residential or mixed use of 1.5, with a minimum FAR for ground floor commercial uses within a mixed-use development required to be 0.15. The maximum FAR for ground floor commercial uses within a mixed-use project is 0.7.

Garages are not included in the FAR calculation for mixed-use projects. Depending on the location of the project, the maximum residential density may be either 35 du/ac with 55 du/ac permitted for affordable and senior housing (Carson Street) or 25 du/ac with 33 du/ac permitted for affordable and senior housing (Sepulveda Boulevard). These development standards encourage the incorporation of housing in mixed-use projects by essentially limiting commercial development to less than half the size of the proposed project.

Mixed uses are also integral to the General Plan Update and future standards for mixed-use development are available in Table 4-1. The Downtown Mixed Use (DMU) designation will require a maximum FAR of 1.5, with active ground floor commercial use required and exempt from FAR calculation. Corridor Mixed Use (CMU) will require a maximum FAR of 1.0, with ground level active commercial uses again exempt from calculation. Both Business Residential Mixed Use (BRMU) and the Flex District (FLX) will require a maximum allowed FAR of 1.0, inclusive of residential uses.

Accessory Dwelling Units

State law requires local governments to use a ministerial approval process for Accessory Dwelling Units (ADUs), which the City currently calls “second dwelling units,” as way to provide additional affordable rental housing. Moreover, ADUs may be counted toward the City’s RHNA. State legislation enacted during recent years, including AB 68, AB 587, AB 671, AB 881, SB 13 and AB 3182, removed many regulatory barriers to ADU development and streamlined the approval and development process at the local level. The 2014-2021 Housing Element included a goal to remove regulatory constraints to second unit development but few changes have been enacted and the current regulations do not comply with State law. Even though cities are subject to all of the State’s ADU requirements regardless of whether local regulations have been updated to be consistent with the most recent changes, bringing zoning regulations into compliance with State law will facilitate development by helping to make requirements easier to understand. Current development standards that are applicable to second units are provided in Table 4-6.

The City’s Zoning Ordinance complies with State law by providing for ministerial approval of ADUs on single-family zoned lots but needs to be revised to ensure that development standards comply with recent changes to State law. Further, per State law, ADUs are permitted in any residential district, not just those with primarily single-family uses. As part of the Zoning Ordinance update, Program 8 in the Housing Action Plan outlines efforts the City will take to ensure ADU standards remain compliant with State law.

Table 4-6: Accessory Dwelling Unit Standards

<i>Standard Type</i>	<i>Description of Standard</i>
Lot Size	<ul style="list-style-type: none"> • RS Zone: 7,500 square feet minimum • RM Zone: 6,500 square feet minimum
Unit Size ¹	<ul style="list-style-type: none"> • Detached unit, 0 bedrooms: 500 square feet maximum • Detached unit, 1 bedroom: 650 square feet maximum • Detached unit, 2 bedrooms: 700 square feet maximum • Attached units: Must follow same requirements as detached units but shall not exceed 40 percent of existing dwelling unit's living area.
Required Setbacks	<ul style="list-style-type: none"> • Detached units: the unit shall be set back a minimum of 10 feet from the primary residential structure and a minimum of six feet from accessory structures. The side yard setback shall be five feet and rear yard setback shall be 15 feet. • If the unit is proposed above an accessory structure, the minimum side yard setback shall be 10 feet, including accessory structure.
Permitted Height	30 feet (two stories) maximum
Required Parking ²	<ul style="list-style-type: none"> • Studio: 1 uncovered off-street parking space outside of front yard setback area. • One bedroom: 1 space within either a garage or carport. Minimum interior dimension for a one car garage shall be 10 feet wide by 20 feet long and 9 feet wide by 20 feet long for a one car carport. • Two bedrooms or unit size exceeding 700 square feet: 2 spaces within a garage

1. In case of internal division to create second unit, the floor area of the primary residence shall not be reduced to less than 1,000 square feet, excluding garage/carport.

2. The parking requirement is in addition to any parking spaces required for a primary residence.

Source: City of Carson, Carson Zoning Ordinance 9125.6 Second Dwelling Unit Development Standards

Transitional/Supportive Housing and Emergency Shelters

Pursuant to State law, the City permits transitional or supportive housing in all residential and mixed-use zones in the city. These types of facilities are subject to the same standards as other residential uses in the same type of development in the same residential zoning district. Any existing single-family or multifamily dwelling can be used by-right as a State licensed transitional or supportive housing facility for six or fewer persons.

Recent State law, including AB 101, also requires that navigation centers for homeless persons be allowed “by right” and without any discretionary approval within the local jurisdiction. The Emergency and Transitional Housing Act of 2019 (AB 139) outlined further development and parking standards, including the requirement that local governments base their need for emergency shelters on the most recent homeless point-in-time count before the start of the planning period. Parking needs to be sufficient to accommodate staff but not exceeding the standards for residential and commercial uses in the same zone as the shelter. AB 2162, effective January 1, 2019, requires

that supportive housing be permitted by-right in zones where multifamily and mixed-use development is permitted.

California Health and Safety Code (Section 50801) defines an emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay.” The City identified the Manufacturing Light (ML) and Manufacturing Heavy (MH) zone districts as appropriate zone districts to permit emergency shelter facilities by right. Buildings located in these areas are generally industrial office/warehouse buildings with ample parking. There are multiple parcels of available vacant developable land in the ML and MH zone. All identified areas are in close proximity to public transportation lines and personal services and retail, such as grocery stores, drug stores, and clinics and medical services. Transitional housing, supportive housing and single-room occupancy (SRO) housing are not permitted in ML and MH zones.

According to City of Carson GIS data, there are 1,472 distinct parcels in the ML and MH zones. Of these, 29 parcels which cover about 24.08 acres are considered vacant. The number of available parcels within both the ML- and MH-zoned sites are more than able to accommodate an emergency shelter to meet the estimated need of 386 homeless individuals in the city, and any future homeless needs. This estimated capacity does not include the potential to convert currently vacant or underutilized buildings in ML and MH zones into an emergency shelter, which can also meet the city’s homeless needs. Currently available facilities include Harbor Interfaith Services (for families) in San Pedro, the Beacon Light Mission (emergency shelter for men) in Wilmington, Doors of Hope (emergency shelter for women) in Wilmington, and the Family Crisis Center (24-hour emergency shelter for youth ages 10-17) in Hermosa Beach.

Single-Room Occupancy (SRO)

Single-Room Occupancy (SRO) Housing is classified as a type of transitional housing by the current Zoning Code. SROs are single-room dwelling units with a maximum of 400 square feet that must contain food preparation and/or sanitary facilities, including efficiency units. Per Sections 9121.1 and 9131.1 of the Municipal Code, SROs are permitted by right, subject to compliance with applicable special limitations and requirements, in the Residential, Multiple-Family (RM), Mixed Use Zone–Carson Street (MU-CS) and Mixed Use Sepulveda Boulevard (MU-SB) zones.

However, Section 9128.7 of the Zoning Code indicates that SROs must be processed “consistent with procedures for multiple-family residential projects.” These projects require a CUP, which conflicts with the automatic permitting otherwise indicated in the Code. Program 13 commits the City to clarify this language during the Zoning Code Update.

Manufactured Homes and Mobile Home Parks

Manufactured homes, also referred to as factory-built homes or modular homes, are defined by the City as a “transportable structure...which is built on a permanent chassis and is designed to be used as a dwelling with a permanent foundation.” Similarly, mobile homes are transportable structures designed for habitation by one family. Manufactured housing is typically constructed off-site and installed on a foundation, which is significantly less costly than the construction of individual

single-family homes on site. There are approximately 2,456 mobile homes in Carson, comprising 9.3 percent of the city's existing housing stock, and 21 rent-controlled mobile home parks. As of July 2021, four of these parks are slated to close, including Imperial Avalon Mobile Home Estates, Park Avalon Mobile Estates, Rancho Dominguez Mobile Estates and Park Granada Trailer Lodge Mobile Home Park.

Per Government Code Sections 65852.3 through 65852.5, manufactured homes must be subject to the same standards as conventional homes in single-family use districts. Government Code Section 65852.7 requires that jurisdictions allow mobile home parks (including condominium and cooperative parks) in all residential zones. Local regulations reducing allowable density below that allowed in the Municipal Code in new mobile home parks are not permitted, although a jurisdiction may require use permits.

The City's Zoning Code allows for mobile homes located on permanent foundations in all residential zones. Such units are automatically permitted provided special limitations and requirements (i.e., the mobile home is certified under the National Mobile Home Construction and Safety Standards Act of 1974 and is located on a permanent foundation system pursuant to Section 18551 of the California Health and Safety Code).

Mobile home parks in Carson are permitted with the approval of a CUP in the RA, RS, RM and MU-CS zones, subject to certain limitations. Mobile home parks have a minimum area of 200,000 sq. ft., with an average area of 2,200 for individual mobile home sites. Mobile homes must be ten feet apart and have a front yard of at least 15 feet or the same as required in the zone in which it is located. No other structure, besides a fence or a wall, can be located within five feet of the front, side or rear lot line of a mobile home site. The City's standards for mobile home parks do not pose significant constraints on the provision of these housing types as evidenced by the number of parks and units in the city.

In addition, the City has established, through its Rent Control Ordinance, rent protection for the households that reside in mobile home parks. Any proposed rent increases must be justified using established criteria. Requested rent increases are generally adjusted and sometimes denied by a City-established Mobile Home Rent Control Board. City Ordinance No. 17-1622 amended the City's Mobile Home Space Rent Control Ordinance to establish the CPI Rent Increase to replace the General Rent Increase. As such, three types of rent increases are allowed for mobile home parks: Capital Improvement Rent Increases, Fair Return Rent Increases, and CPI Rent Increases.

Farmworker Housing

Farming is not a major industry in Carson with only 242 persons classified as employees in the "agriculture, forestry, fishing and hunting, and mining" industry in the city. All affordable housing units are available to these workers. Since all affordable housing units are available to farmworkers in Carson, it is not necessary for the City to establish a specific program or funding for farmworker housing.

State law requires that farmworker housing must be allowed in any zone where agriculture is permitted by right. While there is no land use designation for agricultural use in the current General Plan, the City permits the development of single-family homes together with compatible crop

cultivation and related agricultural activities in the Residential, Agricultural (RA) Zone. There are currently 22 parcels designated for RA use covering about 37.37 acres, which constitutes about 0.37 percent of total acreage in Carson. Cultivation of plants in RA Zone is permitted, but retail sales are not allowed. There is one parcel located in unincorporated county land within the City's SOI that is zoned as Heavy Agricultural, but this will transition to the Utilities land use designation during the General Plan Update. As part of this Update, there will continue to be no land use designation for agricultural uses within the city.

Housing for Persons with Disabilities

California Government Code 65583 requires the City to analyze potential and actual constraints that could affect the development, maintenance, and improvement of housing for persons with disabilities. In the event that these constraints are governmental, the Housing Element must identify those measures that will be effective in removing the constraints that may hinder the City from meeting the need for housing for persons with disabilities. Further, the Lanterman Developmental Disabilities Services Act and Community Care Facilities Act state that mentally, physically, developmentally disabled persons and children and adults who require supervised care are entitled to live in normal residential settings. To that end, State law requires that licensed family care homes, foster homes, and group homes serving six or fewer persons be treated like single-family homes and be allowed by right in all residential zones.

Residential Community Care Facilities (CCFs) are licensed by the Community Care Licensing Division of the State Department of Social Services to provide 24-hour non-medical residential care to children and adults with developmental disabilities who are in need of personal services, supervision, and/or assistance essential for self-protection or sustaining the activities of daily living. Carson has 82 licensed or license pending residential care facilities as of March 2021, all of which are provided in Appendix B of this Element.

In addition, both the Federal Fair Housing Act and the California Fair Employment and Housing Act place an affirmative duty on jurisdictions to make reasonable accommodations in their zoning and other land use regulations as necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. This could include the permitting of a wheelchair ramp in a required setback, allowing an increase in building height to permit an elevator installation, or allowing an applicant time to submit material. Section 9172.27 of the Zoning Code establishes procedures for reviewing and granting requests for reasonable accommodation in compliance with applicable State and federal requirements.

In accordance with State law, a review of zoning and land use, development procedures, policies, and practices, and building codes was conducted in order to identify any potential constraints that could affect the provision of housing that would be accessible to persons with disabilities. The results of this analysis are summarized below according to three general categories of potential constraints.

Zoning and Land Use

The City treats residential care facilities with six or fewer persons, also known as small-family homes, as a single-family use. These facilities are allowed by right in any zone where single-family

homes are permitted under State law. The City permits small-family homes by right in the RA, RS and RM Zones, and in the MU-CS and MU-SB Zones with a CUP. All other residential care facilities (i.e., those with more than six persons) are permitted upon the approval of a CUP in the RM, MU-CS and MU-SB Zones. California State Law requires residential care facilities to be a minimum of 300 feet apart from one another (H&S Code Section 1267.9).

Parking restrictions are equivalent between small-family homes and other single-family uses dependent on zone. In all other residential care facilities, required parking spaces are determined for each CUP “based primarily upon the facility’s licensed capacity, type of care and number of employees.” Per State law, jurisdictions cannot distinguish by type of care provided by a facility. This stipulation poses a constraint, and the City will amend this language as part of its Zoning Ordinance update per Program 13.

Permits and Processing Procedures

There are no permit requirements for residential care facilities serving six or fewer persons. All other residential care facilities require a CUP. The City provides formal procedures for reasonable accommodation in their Zoning Code (9172.27), pursuant to State and federal law. The process begins with a formal application to the City’s Planning Department. A request for accommodation is granted where all the following are established:

- The accommodation requested is intended to be used by an individual with a disability, who resides or will reside on the property.
- The requested accommodation is necessary to afford an individual with a disability equal opportunity to use and enjoy a residential use.
- The requested accommodation will not impose an undue financial or administrative burden on the city.
- The requested accommodation will not require a fundamental alteration in the nature of the land use and zoning program of the city.

Building Code

The City has adopted Title 26, Building Code, of the Los Angeles County Code and the California Building Code, 2019 Edition (Part 2 of Title 24 of the California Code of Regulations), which includes provisions of the Americans with Disabilities Act. The City has added no amendments to the Building Code that would place constraints on accommodation of persons with disabilities.

Based on a review of City’s development procedures and policies, no specific constraints were identified. The City’s Zoning Ordinance does not contain any provisions that would preclude the development of housing for persons with disabilities.

FEES AND EXACTIONS

The development of new housing can impose infrastructure costs on a community. This includes both short-term costs like planning services and long-term costs like facility maintenance. Planning entitlement and building permit fees are collected by the City to defray project entitlement and review costs incurred by the Planning and Building and Safety Divisions. Per State law, these fees are limited to the reasonable cost of providing the service. A number of building and safety services – including building permits, review and monitoring of the design, construction, installation, demolition, and maintenance of privately-owned buildings and structures – are provided by Los Angeles County Building and Safety, managed by Los Angeles County Public Works. Carson is one of 14 contract cities that receive such services from the county. In addition, the City maintains an Interim Development Impact Fee program and a city-wide Community Facilities District to ensure that new developments pay their “fair share” to cover the costs of City-provided services and facilities. These fees, and other relevant fees, are discussed below.

Planning Entitlement Fees

The City imposes planning and application fees for new developments in order to defray the actual costs of services. The City annually conducts a public hearing on proposed new service fees or adjustments to service fees as part of the budget adoption process. The Finance Department maintains the Uniform Comprehensive Schedule of Fees, which was last updated in 2019. Relevant residential development fees, per the Schedule, are provided in Table 4-7. Many of these fees require a deposit which is either reassessed or reimbursed based on the cost of services. With the exception of pre-application review, fees and deposits are equivalent for both single-family and multifamily developments.

Table 4-7: Planning and Application Fees

<i>Fee Category</i>	<i>Fee or Deposit Amount^{1,2}</i>
Pre-Application Review	Single-Family Units: \$150 All Others: \$1,500 deposit
Tentative Tract Map (original, revised, or vesting)	\$15,000 deposit (City) plus L.A. County deposit ³
Tentative Parcel Map (original, revised, or vesting)	\$15,000 deposit (City) plus L.A. County deposit ³
Site Plan and Design Overlay Review (DOR)	
DOR – No Public Hearing/Administrative Only	\$350
Public Hearing (Planning Commission)	\$10,000 deposit
Public Hearing (Residential 1-2 Units)	\$500
Conditional Use Permit	
Residential Uses	\$6,000
Legal Nonconforming – Second Dwelling Unit	\$750
Plot Plan Review	\$150
Variance	\$4,000 deposit

Table 4-7: Planning and Application Fees

<i>Fee Category</i>	<i>Fee or Deposit Amount^{1,2}</i>
General Plan Amendment	\$7,000 deposit
Zone Change	\$7,000 deposit
Specific Plans	\$26,000 deposit
Development Agreement	\$20,000 deposit
Certificate of Compliance Review	\$500
Lot Line Adjustment	\$1,000
Environmental (including Environmental Impact Report, Initial Study, Negative Declaration, Mitigated Negative Declaration)	Actual Cost ⁴

1. Staff time, materials and/or contracted professional services that are spent on the project are charged against the deposit. Additional money will be required if the original deposit balance falls below 20%. Failure or refusal to supplement the deposit, when requested, will cause staff and/or contracted professional services to stop processing the application and any related requests and/or paperwork. Any excess deposit money at the conclusion of the application and review process will be refunded.

2. Deposits for concurrent applications are 50 percent of stated amounts.

3. Per the 2021 County of Los Angeles Department of Regional Planning fee schedule, the fee for a tentative map – minor land division was \$17,606 and the fee for a tentative map – major land division was \$24,957.

4. Calculated as staff time multiplied by wage and benefit rate, plus City's out-of-pocket costs including third-party consultants.

Source: City of Carson, Finance Department, 2019 Uniform Comprehensive Schedule of Fees

Compared with neighboring jurisdictions and the county, Carson has comparable or lower planning fees. For instance, residential CUP fees in Carson (\$6,000 deposit) are similar to or less than in Long Beach (\$4,485 - \$7,812.42), Torrance (\$5,157-\$14,236), Compton (\$9,000) and Los Angeles County (\$1,749 - \$10,215). Variances, general plan amendments, and zone changes are also generally lower in Carson. However, stakeholders have noted that there are high costs associated with services that are contracted out to Los Angeles County, although they found the Electronic Permitting and Inspections (EPIC) LA system to be easy to use. They also noted that services provided in-house, like plan checks, were cost effective and worked well. For instance, compared to other contract cities like Lawndale (\$5,000 deposit), Cerritos (\$4,157), and Artesia (\$3,063.60), Carson charges a higher deposit for tentative tract and parcel maps.

Building Permit Fees

Building permit fees are based on the total valuation of the property. Los Angeles County provides building permit services for the City of Carson, including releasing a fee schedule and valuation table through the Building and Safety Division (BSD), managed by Los Angeles County Public Works. Permit fees are based on the Consumer Price Index and are subject to change based on fluctuations in the Index. The base permit issuance fee as of July 1, 2021 is \$53.10, while building permit fees (including energy and disabled access check) depend on the valuation of the property. As the value of a property increases, the permit fee will likewise increase.

Per the Zillow Home Value Index (ZHVI) as discussed in Chapter 2, the typical value of a single-family home in Carson is \$643,804 while the typical value of a two-bedroom unit is \$478,059.

According to the 2021-2022 BSD Valuation Fee Table for Carson, not including the \$53.10 permit issuance fee, a typical single-family home valued at about \$644,000 would require a \$10,469.83 building permit fee (including energy check). A 20-unit unit multifamily project valued at about \$479,000 per unit (about \$9.58 million) would require a \$143,641.53 building permit fee (including both energy and disabled access check).

Community Facilities District

A Community Facilities District (CFD), or Mello-Roos District, is a type of special taxing district used to finance public improvements and services where no other source of funding is available. On November 7, 2018, the City adopted Resolution No. 18-119 to form the Community Facilities District No. 2018-01 ("CFD") for maintenance and services. This CFD also included a City-wide future voluntary annexation area. New development projects that impose negative fiscal impacts on recurring City services now have the option to annex into the CFD with the approval of their property owner. A Fiscal Impact Analysis study (FIA) was conducted in March 2019 to quantify the financial impacts of new development on the City's current financial resources. The FIA concluded that future residential and industrial development will produce an overall negative fiscal impact, while future non-residential development will produce an overall positive fiscal impact.

Based on the findings of the FIA, residential projects are required to mitigate their fiscal impacts in the amounts comparable to those provided in Table 4-8. Annexation into the CFD would satisfy this requirement.

Table 4-8: CFD No. 2018-01 Maximum Annual Special Tax Rates¹

<i>Land Use Category</i>	<i>Base Year</i>	<i>July 1, 2020</i>	<i>July 1, 2021</i>	<i>July 1, 2022</i>	<i>July 1, 2023</i>	<i>July 1, 2024</i>
Residential - Studio and Apartments, 1 Bedroom or less (per unit)	\$517.94	\$554.20	\$592.99	\$634.50	\$678.91	\$726.44
Residential - All Others (per unit)	\$879.10	\$940.64	\$1,006.48	\$1,076.94	\$1,152.32	\$1,232.98

1. On each July 1, commencing on July 1, 2020 through and including July 1, 2024, the Maximum Special Tax Rate for Tax Zone No. 4 shall be increased by 7%. On each July 1, commencing on July 1, 2025 and thereafter, the Maximum Special Tax Rate for Tax Zone No. 4 shall be increased by the percentage change in the November annualized Consumer Price Index for Los Angeles-Long Beach-Anaheim for all Urban Consumers, the Tax Escalation Factor for Tax Zone No. 4.

Source: City of Carson, Community Development Department

Interim Development Impact Fees

On April 16, 2019 the City adopted Ordinance No. 19-1931 to implement the Interim Development Impact Fee (IDIF) program. Pending adoption of the General Plan Update and established development impact fees (DIF), the IDIF program allows the City to charge various types of new developments to pay their "fair share" towards the costs of City services and maintenance operations. The IDIF Program will remain until the General Plan Update is adopted

and a more comprehensive DIF study is completed. Developments that are exempt from IDIFs include senior citizen housing developments, affordable housing, accessory dwelling units, tenant improvements, business license renewals, lease extensions, renovations of existing structures, building additions of less than 10 percent of the on-site building footprint, and development projects owned by the City, the Carson Successor Agency, the Carson Reclamation Authority, and the Carson Housing Authority. The City also grants “fee credits” based on demolition and new construction as well as for the construction of public facilities.

In adopting the IDIF program, the City has since repealed Section 9207.19 Park and Recreational Facilities of the Carson Municipal Code, commonly referred to as the “Quimby Ordinance.” Prior to adoption of the IDIF program, the City levied fees against projects consistent with the Quimby Act. Since future development in the City will consist of infill and multifamily development, the Quimby Ordinance is no longer an appropriate method of mitigating the impact of development. As such, the IDIF program has effectively replaced the Quimby Ordinance and can more appropriately apply to the types of development that are expected to occur, including rental and ownership multifamily projects.

The IDIFs associated with residential development as of July 1, 2021 are available in Table 4-9 below. These fees, while necessary to ensure continued City maintenance and services, will increase the costs of construction. IDIFs in Carson apply only to multifamily, but not to single-family residential projects. The neighboring jurisdictions of Torrance and Long Beach also levy DIFs for multifamily projects, although these are significantly less than those required in Carson - \$5,290.60 per unit and about \$5,712.00 per unit, respectively. These jurisdictions also impose DIFs on single-family residences. Further, the IDIF Nexus Study conducted in 2019 carried out a similar fee comparison including Signal Hill, Torrance, Long Beach, El Segundo and Anaheim. While fees were still lower in Torrance and Long Beach, they were higher in Signal Hill, El Segundo, and Anaheim. The Study also identified that cities receiving a lower share of property tax dollars, like Carson, tend to have higher fee rates.

Since fees only target multifamily projects, in practice this promotes a preference towards single-family development. This is contrary to the aims of the General Plan Update and represents an undue burden on multifamily housing. Following the General Plan Update City will study and reevaluate Carson’s current IDIFs to best reflect the impact of residential development, including single-family development, on public infrastructure costs.

Table 4-9: Interim Development Impact Fees

<i>Project Type</i>	<i>Fee Category</i>	<i>Adopted IDIF Rates</i>
Residential MFR ¹ Studio/One Bedroom	Administration ²	\$1,293.19
	Traffic	\$406.10
	Parks	\$9,221.44
	Beautification	\$35.89
	General Government Facilities	\$257.49
	Transportation Infrastructure	\$524.58
	Utilities and Sustainability	\$331.08
	Total (Per Unit)	\$12,069.79
Residential MFR All Other	Administration	\$1,616.49
	Traffic	\$286.82
	Parks	\$11,723.16
	Beautification	\$45.63
	General Government Facilities	\$327.35
	Transportation Infrastructure	\$666.89
	Utilities and Sustainability	\$420.90
	Total (Per Unit)	\$15,087.23

1. MFR – Multi-family residence.

2. IDIF Program Administration covers ongoing program administration and is not one of the six impact fee category for capital improvements. Impact Fees are calculated and due prior to issuance of a building permit in one lump sum installment. Fees subject to adjustments every July 1 based on State of California Construction Cost Index (Prior March to Current March Adjustment). Not all fees may be applicable, certain credits may apply.

Source: City of Carson, IDIF Program – Fee Table (July 2021 to June 2022)

School Impact Fees

The City of Carson is served by two school districts: Los Angeles Unified School District (LAUSD) and Compton Unified School District (CUSD). Both districts charge impact fees on residential development, as shown in Table 4-10. While the City collects school impact fees, it does not impose them and has no control over the amounts set.

Table 4-10: School Impact Fees

<i>School District</i>	<i>Residential Impact Fee</i>
Compton Unified School District	\$4.08 per square foot
Los Angeles Unified School District	\$4.08 per square foot

Source: Compton Unified School District, 2021; Los Angeles Unified School District, 2021

Total Typical Fees by Unit Type

Typical development fees can be determined by summing applicable fees and exactions by development type. This includes planning entitlement fees, building permit fees, CFD exactions, the IDIF program, and school impact fees.

The typical total development fees for a 1,500 square foot, two-bedroom single-family unit (building valuation of \$644,000) sum to approximately \$18,233.57, not including the City deposit of \$15,000 for a tentative map. The typical total development fees for a 20-unit multifamily development where each unit is a 1,000 square foot, two-bedroom unit (building valuation of about \$479,000 per unit) is \$551,852.03, not including the required \$26,500 of City deposits. Per unit, not including deposits, this is approximately \$27,592.

PROCESSING AND PERMIT PROCEDURES

The review and approval of a residential project can be a lengthy process that significantly adds to the cost of development. Jurisdictions must provide uniform development procedures to ensure that proposed projects both have a clear path to approval and adhere to local regulations and adjacent land uses. A summary of the required procedures for residential projects is provided below.

In the City of Carson, per Section 9172.23 of the Zoning Code, virtually any new residential construction or modification is subject to Site Plan and Design Review and requires a Development Plan. If the estimated valuation is \$50,000 or more the Development Plan must be approved by the Planning Commission, while projects with a valuation of less than \$50,000 are subject to Director approval. The processing time for this process is 3 to 6 months depending on complexity. Following approval of a Development Plan there is a 15-day appeal period. Planning Commission or Director review of a Development Plan must consider the following criteria:

- Compatibility with the General Plan, any specific plans for the area, and surrounding uses.
- Compatibility of architecture and design with existing and anticipated development in the vicinity, including the aspects of site planning, land coverage, landscaping, appearance and scale of structures and open spaces, and other features relative to a harmonious and attractive development of the area.
- Convenience and safety of circulation for pedestrians and vehicles.
- Attractiveness, effectiveness and restraint in signing graphics and color.
- Development scheduling (if phased development) which will satisfy the above criteria in each phase.
- Conformance to any applicable design standards and guidelines which have been adopted. Such design standards and guidelines may be generally applicable or may specify different requirements for different areas.

Further, all multifamily residential developments (including residential condominiums) in any zone are subject to approval of a conditional use permit (CUP). Typical processing of a CUP takes

6-12 months. If a negative declaration is required under the California Environmental Quality Act (CEQA), there is a mandatory 20-day review period. The following affirmative findings are required to be made:

- The proposed use and development will be consistent with the General Plan.
- The site is adequate in size, shape, topography, location, utilities, and other factors to accommodate the proposed use and development.
- There will be adequate street access and traffic capacity.
- There will be adequate water supply for fire protection.
- The proposed use and development will be compatible with the intended character of the area.
- Such other criteria as are specified for the particular use in other Sections of Carson's Zoning Ordinance.

The current permitting process in Carson poses a major constraint to development. If a project is consistent with the General Plan and meets zoning requirements, State law requires the approval process to be ministerial. However, existing standards are largely subjective and the process is discretionary. The existing development review process is inconsistent with the Housing Accountability Act and will be revised as the Zoning Ordinance is updated, outlined in Program 5 of the Housing Action Plan.

Developers in Carson indicated that development timelines were a major constraint, and that streamlined review would help decrease costs. The City does not currently maintain a SB 35 eligibility checklist to determine if a project is eligible for expedited review per the streamlined and ministerial approval process for certain housing projects. The adoption of such a checklist and other efforts to reduce development timelines are described in Program 6.

As has been previously discussed, the CUP requirement for all multifamily development (including residential condominiums) is also a major constraint. Housing projects that meet all applicable standards and are consistent with the General Plan must be permitted via a ministerial process and jurisdictions have limited ability to require changes. This is especially true if the project contains affordable units, as State law may require a jurisdiction to approve such projects by right – provided they are compliant with all relevant standards. Program 5 in the Housing Plan outlines the efforts the City will take to remove this constraint during the update to the Zoning Code.

INFRASTRUCTURE CONSTRAINTS

Water services, sewage facilities, electrical services and public services are of critical importance to a city. The provision and maintenance of these facilities enhance the safety of neighborhoods and serve as an incentive to homeowners to maintain their homes. Alternatively, when these public improvements are left to deteriorate or their use is overextended, neighborhoods can become neglected and show early signs of deterioration.

Water and Sewer Services

The City of Carson and areas within the City's SOI receive water services from the California Water Service Company's Rancho Dominguez District (CWS) and the Golden State Water Company (GSW), while supply is provided by the Metropolitan Water District (MWD). The majority of Carson is served by CWS, while GSW serves portions of the city primarily in the northwest corner. Water is provided to the city from a combination of groundwater and surface water sources, some of which is purchased and imported from MWD. The CWS Dominguez District water system includes 374 miles of pipeline, nine active wells, 12 storage tanks and seven MWD connections.

The CWS Rancho Dominguez District 2020 Urban Water Management Plan (UWMP) provides water supply and demand projections in five-year increments through the year 2045. The UWMP guarantees that CWS has a sufficient supply to meet the water demands for the Rancho Dominguez District in all year types through the year 2045. Likewise, per the 2020 UWMP of the Southwest District of the Golden State Water Company (GSW) demonstrates the District has reliable supplies to meet demand in all year types through 2045.

The City owns the local sanitary sewers within city boundaries, which the City Public Works Department manages. The Los Angeles County Department of Public Works Consolidated Sewer Maintenance District (CSMD) provides operation and maintenance services for the city's sewer facilities. Since the City participates in the CSMD's Condition Assessment Program, CSMD collects user fees for operation and maintenance of existing local sewer lines. In addition, the trunk lines and treatment plant within the city are owned and operated by the County Sanitation Districts of Los Angeles County (Districts). Wastewater generated within the city is treated at the Joint Water Pollution Control Plant (JWPCP) located at 24501 South Figueroa Street in Carson. The JWPCP has a total permitted capacity of 400 million gallons of wastewater per day (mgd) and provides both primary and secondary treatment for approximately 260 mgd. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on regional growth forecasts adopted by the Southern California Association of Governments (SCAG). All expansion of Districts' facilities must be sized and service phased in a manner that would be consistent with SCAG's regional growth forecasts. The available capacity of the Districts' treatment facilities would be limited to levels associated with the approved growth identified by SCAG.

In accordance with Section 65589.7 of the California Government Code, the draft Housing Element was submitted to the California Water Service Company (CWS) Dominguez District and to the Golden State Water Company (GSW). These entities/agencies have given priority to proposed lower income housing when allocating available water supply and wastewater treatment capacity.

Electrical Services

Electric services are provided by the Clean Power Alliance. All Carson residents are provided with 50 percent clean energy, with the option of selecting the two other rate options: Lean Power at 36 percent renewable content and Green Power at 100 percent renewable content. The Clean Power Alliance is a nonprofit entity, formed through a Joint Powers Authority (JPA) made up of 31 public agencies across Los Angeles and Ventura counties – including Carson. The Clean Power Alliance purchases clean power from Southern California Edison (SCE), which ultimately delivers power

both to residential and non-residential buildings. The Clean Power Alliance provides a number of financial assistance plans to deliver clean energy to lower income households.

Public Services

Carson does not have its own police or fire department, as both services are provided by the county. Police services are provided by the Los Angeles County Sheriff's Department (LACSD), while fire protection and emergency medical services are provided by the Los Angeles County Fire Department (LACFD). Future residential growth in Carson will require additional public service personnel if the existing levels of service for law enforcement, fire protection, and other essential services are to be maintained. The nature and characteristics of future population growth will, to a large extent, determine which services will require additional funding to meet the city's future needs.

4.2 Non-Governmental Constraints

ENVIRONMENTAL CONSTRAINTS

Environmentally sensitive areas within the city may represent serious constraints to development due to the decreasing amount of vacant land in non-sensitive areas of the city. Due to Carson's history as a major industrial center many potential sites for development may need to undergo remediation, which would increase costs for affordable housing. The implementation of objective development standards can reduce the time and costs introduced by a discretionary environmental review. In Carson, some environmental hazards have such objective standards while others do not. As is discussed below, Program 6 in the Housing Action Plan describes efforts the City will make to identify development standards for sites that are subject to potential environmental safety hazards.

Air Quality

The City is located within the South Coast Air Basin (Air Basin), for which the South Coast Air Quality Management District (SCAQMD) is responsible for the development of air quality management plans (AQMP) in order to achieve air quality standards. Due to the city's location within the Air Basin, proximity to major roadways, and prevalence of heavy industry Carson is in non-attainment for several air quality attainment standards. Any future development should focus on compatibility of industrial and residential uses in order to reduce residential exposure to mobile- and stationary-source emissions associated with highways and industrial uses. The City should also work with transportation authorities to encourage alternatives to automobile travel.

The Air Quality Element of the current General Plan includes policies and programs to reduce pollution emissions and require new development to include measures to comply with air quality standards. These policies and programs are based on federal and State air quality standards and will be updated with the ongoing General Plan Update. The updated Zoning Ordinance will use these policies and programs to formulate objective standards related to air quality and new development, described in Program 6.

Hazardous Materials

As a result of the city's long history of industrial and commercial development, and the fact that waste management practices and regulations were either not in place or not up to current standards, there are several sites within the city that have the potential to have been impacted by previous releases of contaminated materials. Following incorporation, the City has worked to close down most of the unwanted facilities, enforced a strict building and landscaping code, cleaned up contaminated sites, and worked to attract successful new commercial ventures. As a result, most of the heavy industry of the past has been replaced. Even so, there is still a considerable number of sites that generate or involve hazardous materials within the city. Hazardous materials users and waste generators within the city include businesses, public and private institutions, and households. There are also a number of freight trains which traverse the city that haul various types of hazardous and explosive materials, including chlorine gas and low-pressure natural gas. Additionally, there are numerous underground pipelines which carry flammable and hazardous liquids. Standards for the redevelopment of former gas or oil sites are set forth in the Oil and Gas Ordinance, contained in Article IX, Chapter 5, Part 3 of the Municipal Code. As part of the Zoning Ordinance update, described in Program 6, all objective development standards will be maintained.

Carson has adopted the Los Angeles County Hazardous Waste Management Plan, which provides policies and programs to address hazardous waste management issues. The Los Angeles County Fire Department (LACFD), under the Health Hazards Division, is responsible for inspection of hazardous materials and/or waste generating businesses, criminal investigations, site mitigation oversight and emergency response in Carson.

Oil Production Hazards

Carson overlies parts of the Dominguez and Wilmington oil fields. According to the 2016 Report of California Oil and Gas Production Statistics, the Dominguez Oil Field produced approximately 38,502 barrels of oil and the Wilmington Oil Field produced approximately 3,563,402 barrels of oil. Petroleum contains several components that are considered hazardous, such as benzene, a known carcinogen. Oil field activities often include the use of hazardous materials like fuels and solvents. In the past, day-to-day practices in oil fields were not environmentally sensitive and resulted in oil-stained soils and other contaminants in and around oil fields. Remediation of these areas is generally required when the oil field is no longer economically productive. Comprehensive site investigations are required to accurately identify and characterize any soil and groundwater contamination. Many of these sites located within the city are undergoing or have undergone remediation to clean up contamination. Additionally, as discussed below, methane gas is associated with oil production, and any future development in and around oil wells, require adherence the City's Oil and Gas Ordinance. Per Section 9537 of the Carson Municipal Code, any proposed redevelopment of a former oil and gas site that is not an oil or gas operation requires a CUP. As part of the Zoning Ordinance update, Program 6 will ensure that all standards related to redevelopment remain objective.

Methane Gas

Methane gas occurs in the shallow subsurface of some areas of the city. Methane can originate from leaking pipelines, old landfills, or natural sources. Methane could accumulate beneath developed

areas where concrete and asphalt surfaces prevent the natural migration of methane gas to the atmosphere. If the methane gas migrates through cracks in the concrete foundations, it could accumulate in the interior of the structure creating the potential for an explosion or fire.

Because of the city's methane sources, the city has adopted building codes governing development and redevelopment projects. The requirements are intended to protect health and safety of workers, residents, and the surrounding community. It requires that structures within 1,000 feet of a methane producing site (fill containing rubbish or other decomposable material) and/or within 300 feet of active, abandoned, or idle oil or gas well(s) be designed in accordance with a report by a licensed civil engineer and/or licensed petroleum engineer, to evaluate and remediate potential methane gas hazards.

Additionally, the County of Los Angeles Methane Gas Mitigation Standards, which the City has adopted, establishes requirements for buildings and enclosed structures located in areas classified as being either in a methane zone or methane buffer zone. The county has prepared a Methane Package that details the codes and laws that pertain to methane gas for the County of Los Angeles. The County also provides maps of major waste systems and oil/gas well locations within the County of Los Angeles. Pursuant to the county mapping, parts of the city are located within methane zones or methane buffer zones.

Landfill Hazards

According to the State Water Resources Control Board (SWRCB) GeoTracker, there are 27 land disposal sites within Carson's boundaries, all of which are considered closed and inactive. Table 4-11 below lists these facilities as well as current General Plan land use designation for each site. Although all of these landfills are inactive and none of them currently accept materials that decompose chemically or biologically, some of these sites may produce landfill gases – including methane. Other sites will probably not produce landfill gases since they contain non-water soluble, non-decomposable inert solids. Additionally, some areas of the city are sites of previous organic landfill activity and may be subject to decomposition and the production of landfill gases.

Redevelopment on former landfill sites requires certification from a licensed engineer to prove that adequate natural or man-made methane migration barriers are provided. This requires a methane gas mitigation plan with periodic monitoring stipulations, among others. Projects may also be required to comply with the State Department of Toxic Substances Control (DTSC) consent orders. As part of the Zoning Ordinance update, Program 6 will ensure that the standards for redevelopment on former landfill sites remain objective.

The Organic Refuse Landfill (ORL) Overlay District exists to regulate the uses of organic refuse landfill sites and ensure that proper mitigation measures are taken to eliminate or minimize hazards to persons and property and environmental risks associated with such sites. The development of such a site within the ORL Overlay requires a CUP approval from both the Planning Commission and the City Council. Lawfully established existing uses, or an expansion of such uses, are exempt. As noted earlier, there are currently no active land disposal sites within Carson.

The majority of these former landfills are located on land designated for industrial use, with some commercial and residential uses permitted. The District at South Bay Specific Plan is a notable

example of proposed redevelopment over a prior landfill. Nearly 157 acres of the 168-acre site is a former landfill, and the project will contain mixed-use development including about 696,500 square feet of regional commercial uses, 15,000 square feet of restaurant space, approximately 1.57 million square feet of light industrial uses and approximately 12 acres of community serving uses. The project is also slated to develop nearly 1,250 residential units. The former landfill site will be subject to grading, subsurface remediation and capping per the 1995 Remedial Action Plan (RAP), as modified by the 2011 Explanation of Significant Differences (ESD), both as approved by the DTSC.

Table 4-11: Landfill Sites and Land Use

<i>Facility Name</i>	<i>Land Use</i>	<i>Facility Address or Partial Address</i>	<i>Zipcode</i>
Adams Industries Landfill	High Density Residential	213 Street & Dolores St (21111 Dolores Street)	90745
Alameda Street Dump	Heavy Industrial	22700 (22746?) S. Alameda Street	90810
BKK Carson Landfill	Regional Commercial	19200 Main Street	90248
Broadway & Main Corporation	Heavy Industrial	19135 South Broadway	90248
Brown, Morris H	Light Industrial	SW Corner of 190th St & Figueroa St	90248
Cal-Compact (No. 2) Landfill	Mixed-Use Residential	20300 South Main Street	90745
California By Products Disposal Site	Heavy Industrial	2241 East Carson Street	90810
Carson No. 1 - Shell Chemical Company	Light Industrial	19204 S. Figueroa St (19401 S. Main Street)	90248
Carson Terminal	Low Density Residential/General Commercial	220 W 228th Street	90748
D & D Property Maintenance	Heavy Industrial	23000 South Alameda Street	90058
Dominguez Energy	Light Industrial	Dominguez Oil Field Reyes Lease	90746
Dominguez Energy, L.P.	Light Industrial	1556 Victoria	90749
Fletcher Oil and Refining	Heavy Industrial	24721 S. Main Street	90745
Gardena Valley No. 1-2 Landfill	Mixed Use Business Park	101 West Torrance Blvd	90745
Gardena Valley No. 5 Landfill	Light Industrial	21000 Figueroa St S	
Gardena Valley No. 6	Regional Commercial	213th Street (21001 Chico Street)	90745
Hardwick Disposal Pit No. 44	Heavy Industrial	22620 South Alameda Street	90810
Hardwick Disposal Pits - Watson Land Co,	Heavy Industrial	22400 South Alameda Street	90810
Johns-Manville Carson	Heavy Industrial	2420 East 23rd Street	90755

Table 4-1 I: Landfill Sites and Land Use

<i>Facility Name</i>	<i>Land Use</i>	<i>Facility Address or Partial Address</i>	<i>Zipcode</i>
Joint Water Pollution Control Plant	Heavy Industrial	24501 S. Figueroa Street	90745
Moneta Avenue Dump	Light Industrial	18900 South Moneta Avenue	90745
Mor-Glow Paint Company	Heavy Industrial	18937 S. Main Street	90248
Niklor Chemical Co.	Light Industrial	2060 East 220th Street	90810
Southwest Conservation Inc.	Mixed Use Business Park	20201 S. Main Street	
Southwest Steel Rolling Mills No. 1 Landfill	Light Industrial	19130 S. Figueroa	90248
Southwest Steel Rolling Mills No. 2 Landfill	Light Industrial	19001 S. Broadway	90248
Werdin	Low Density Residential	20400 S. Main Street	90745

Source: GeoTracker, 2021

Noise Exposure

Residential land uses are considered the most sensitive to loud noise. Carson's noise environment is dominated by vehicular traffic including vehicular-generated noise along Interstate 405 (I-405), State Route 91 (SR-91), and primary and major arterial roadways. Additionally, the Compton and Long Beach Airports, as well as railroad operations within the city contribute to the overall noise environment. Furthermore, a number of other sources contribute to the total noise environment such as construction activities, power tools, industrial operations, gardening equipment, loudspeakers, and auto repair. Residential development near these major noise generators requires consideration of special noise attenuation measures, which could add to the cost of development.

Existing traffic noise at the nearest property lines range from 63.2 dBA CNEL along Del Amo Boulevard east of Alameda Street to 74.7 dBA CNEL along Sepulveda Boulevard east of the Alameda Street Connector. Sound levels within a 60 or 65 CNEL contour indicate that noise levels are high enough to be of potential concern but does not imply that excessive noise levels are uniformly present on all sites within the area. Mitigation measures may be needed in these areas.

The 60 or 65 dBA noise contours for the three airports in proximity to Carson – the Compton, Torrance and Long Beach airports – do not extend into the boundaries of the city. However, the three railways that traverse the city may negatively contribute to the noise environment. The Alameda Corridor, the MTA Blue Line and the Harbor Subdivision may produce sound levels that are higher than recommended by the U.S. Department of Transportation for residential properties in close proximity.

While traffic noise is a major contributor to the city's overall noise environment, other noises such as industrial, commercial and rail noise also contribute. Several existing residential areas are currently exposed to noise levels greater than the normally acceptable level of 60-65 dBA and may require mitigation, such as sound walls. The Noise Element of the City's current General Plan, as well as the Noise Control Ordinance contained in Article V, Chapter 5 of the Carson Municipal

Code, describes all relevant federal, State, and City noise standards. Further, the current Zoning Ordinance outlines attenuation of noise standards for various forms of residential development. Table 4-12 outlines noise and residential land use compatibility, while Table 4-13 describes interior and exterior noise standards. These standards will be updated during the General Plan and Zoning Ordinance updates, further described in Program 6. As standards are derived from federal and State requirements, they do not pose a significant constraint to development.

Table 4-12: Noise and Residential Land Use Compatibility

Land Use Category	Community Noise Exposure (Ldn or CNEL, dB)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density	50-60	60-65	65-75	75-85
Residential – Multiple Family	50-60	60-65	65-75	75-85

Notes:

- **NORMALLY ACCEPTABLE:** Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
- **CONDITIONALLY ACCEPTABLE:** New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
- **NORMALLY UNACCEPTABLE:** New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
- **CLEARLY UNACCEPTABLE:** New construction or development should generally not be undertaken.

Source: City of Carson, Carson General Plan - Noise Element

Table 4-13: Interior and Exterior Residential Noise Standards

Uses	Interior CNEL ¹	Exterior CNEL ²
Single family Duplex, Multiple Family	45-55	50-60
Mobile Home	45	65

1. Indoor environmental including: Bedrooms, living areas, bathrooms, toilets, closets, corridors.

2. Outdoor environment limited to: Private yard of single family, multi-family private patio or balcony which is served by a means of exit from inside the dwelling, balconies six feet deep or less are exempt, mobile home park, park's picnic area, school's playground.

3. Noise level requirement with closed windows. Mechanical ventilating system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of UBC.

4. Exterior noise levels should be such that interior noise levels will not exceed 45 CNEL.

Source: City of Carson, Carson General Plan - Noise Element

MARKET CONSTRAINTS

Market conditions affect the provision of adequate and affordable housing. Housing Element law requires jurisdictions to examine potential market-based constraints, among other non-governmental constraints, to the development of new housing and the maintenance of existing

units for all income levels. Market constraints that potentially affect housing development in Carson – including land costs, construction costs, and the availability of financing – are discussed below.

Land Costs

The price of raw land and any necessary improvements is a key component of the total cost of housing. The diminishing supply of land available for residential construction combined with a fairly steady demand for such development has served to keep the cost of land high in Southern California. In addition, the two factors which most influence land holding costs are the interest rate on acquisition and development loans, and government processing times for plans and permits. The time it takes to hold land for development increases the overall cost of the project. This cost increase is primarily due to the accrual of interest on the loan, the preparation of the site for construction and processing applications for entitlements and permits.

Land costs are often difficult to estimate, and there is no single publicly available database that records urban land prices. Various private entities, like the CoStar Group, do maintain databases that record transaction details within the commercial real estate industry. Based on the CoStar COMPS database, researchers have determined that between 2005 and 2010, the Los Angeles-Long Beach metropolitan area had the fifth highest national land value, when compared to other major metropolitan areas in the U.S., at \$2,326.8 billion per acre.¹ Thus, the land costs associated with the Southern California housing market will inevitably be relatively high.

Considering the high cost of urban land in the Los Angeles-Long Beach metropolitan region, Carson has relatively competitive land prices and leases, as well as low fees for development and permits per Volume I of the 2018 Existing Conditions Report. As noted in Chapter 2 of this Housing Element, however, there is a demonstrated need for larger and denser housing at all affordability levels given rising rents and home values, rent burden, and overcrowding. This is especially true given Carson's nearly complete development, with approximately 97.7 percent of land developed. Residential uses account for approximately 25.5 percent of developed land in the city. Although the City has identified a sufficient number of vacant residentially-zoned parcels and non-vacant opportunity sites to accommodate projected housing needs, available vacant residential land will become scarcer over time. Almost all large vacant land in Carson is either above a former landfill or has some kind of environmental constraint (e.g., contains a former oil operation). The cost of vacant land, and the remediation of such land, is likely to increase. However, as a general rule, if the land cost component in the city remains within the 35 percent range of overall costs, then the availability of land should not pose a significant constraint on the development of housing for all income groups.

Construction Costs

Construction input prices have seen major fluctuations over the course of the COVID-19 induced economic crisis. Using the U.S. Bureau of Labor Statistics' Producer Price Index the Associated Builders and Contractors (ABC), a national construction industry trade association, have assessed

¹ David Albouy, Gabriel Ehrlich, and Minchul Shin (2018): Metropolitan Land Values, *The Review of Economics and Statistics*, DOI: 10.1162/rest_a_00710

these price fluctuations. Between February 2018 and 2019, construction input prices increased 1.8 percent, while this slowed to 0.4 percent between February 2019 and 2020. That decrease was largely due to decreases in the costs of energy. However, prices increased 7.6% between February 2020 and 2021, driven in part by the increased costs of softwood lumber and natural gas. According to the ABC, inflation and supply chain issues are at the root of these massive price increases. If these price increases continue, they will likely decrease contractor's profit margins and increase constraints on affordable housing development. Developers in Carson noted that supply chain issues increased the costs of development, a problem that was of particular concern to mixed-use developers.

The cost of materials and labor are considered “hard” construction costs. Hard construction costs comprise the majority of total development costs in California’s housing market. According to a report by the Turner Center at UC Berkeley which focuses on multifamily housing projects, trends in the prices of both labor and materials have likely contributed to hard cost increases over the 2009 to 2018 period.² The Los Angeles region was identified as one of the two most expensive regions in the state, where average hard costs were \$35 more expensive per square foot. Affordable housing projects also tend to cost more than market-rate or mixed-affordability projects, although this is largely correlated with project size.

The report also identifies “prevailing wages” as being associated with higher costs, although the broader benefits of this policy could not be captured in their model. Prevailing wages requires that all bidders on public works projects in the State of California use the same wage rates to ensure that a contract is not awarded based on lower wages. All workers on the project must be paid a prevailing wage. State law, including SB 35, requires affordable housing projects that seek streamlined approval must pay prevailing wages to the workers on that project. The prevailing wage is determined twice a year by the California Department of Industrial Relations. Prevailing wages tend to be higher than normal market wages, which may pose a constraint to the construction of affordable housing. This constraint, however, is not specific to Carson.

Variations in the quality of materials, type of amenities, labor costs and the quality of building materials could result in higher or lower construction costs for a new home. Pre-fabricated factory-built housing, with variation on the quality of materials and amenities may also affect the final construction cost per square foot of a housing project. Furthermore, the unit volume – that is the number of units being built at one time – can change the cost of a housing project by varying the economies of scale. Generally, as the number of units under construction at one time increases, the overall costs decrease. With a greater number of units under construction, the builder is often able to benefit by making larger orders of construction materials and pay lower costs per material unit.

Density bonuses granted to a project can also impact construction costs. Municipalities often grant density bonuses as an incentive for the builder to provide affordable units at the project site. The granting of a density bonus provides the builder with the opportunity to create more housing units and therefore more units for sale or lease than would otherwise be allowed without the bonus. Since additional units can potentially increase the economy of scale, the bonus units could potentially reduce the construction costs per unit. This type of cost reduction is of particular benefit when

² Hayley Raetz, Teddy Forscher, Elizabeth Kneebone, and Carolina Reid (2020): The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California, *Turner Center for Housing Innovation*

density bonuses are used to provide affordable housing. The State Density Bonus Law, Government Code 65915, along with other recent State law, dictates the amount of allowed capacity above the base density as well as affordability-based eligibility requirements. Projects that meet such affordability requirements will also likely meet SB 35 affordability requirements and would therefore be eligible for streamlining. Such streamlining could also help reduce construction costs.

Availability of Financing

Interest rates are determined by national policies and economic conditions, and there is little that local governments can do to affect these rates. Jurisdictions can, however, offer interest rate write-downs or direct subsidies to households to extend home purchasing opportunities to a broader economic segment of the population. In addition, government insured loan programs may be available to reduce mortgage down payment requirements. While interest rates are currently low, any significant change has the potential to substantially impact housing affordability, especially for first-time homebuyers. As the economy recovers following the COVID-19 pandemic, it is likely that interest rates will increase but still remain low enough to encourage home purchases.

While interest rates may not currently pose a significant barrier to affordability, it is apparent that other barriers to affordability do exist in Carson's housing market. As discussed in Chapter 2 of this Housing Element, affordable home purchase prices are largely out of reach for Carson residents, especially lower-income residents. High home values reduce the ability of lower-income residents to fulfill down payment requirements, considering that most conventional home loans require 80 percent loan-to-value, although various programs for first-time buyers can reduce this significantly to between five and 20 percent.

Securing a home loan, however, can be a major impediment to lower-income homebuyers. Credit worthiness, along with a person's debt-to-income ratio and cash available for a down payment, are the major factors lenders consider when determining maximum loan amounts, according to the Federal Housing Authority. Lower-income residents with poor credit ratings may only qualify for loans with higher interest rates or those which are insufficient to make a purchase. Programs to re-establish good credit may be necessary to ensure that lower-income residents are able to obtain sufficient and good quality home loans.

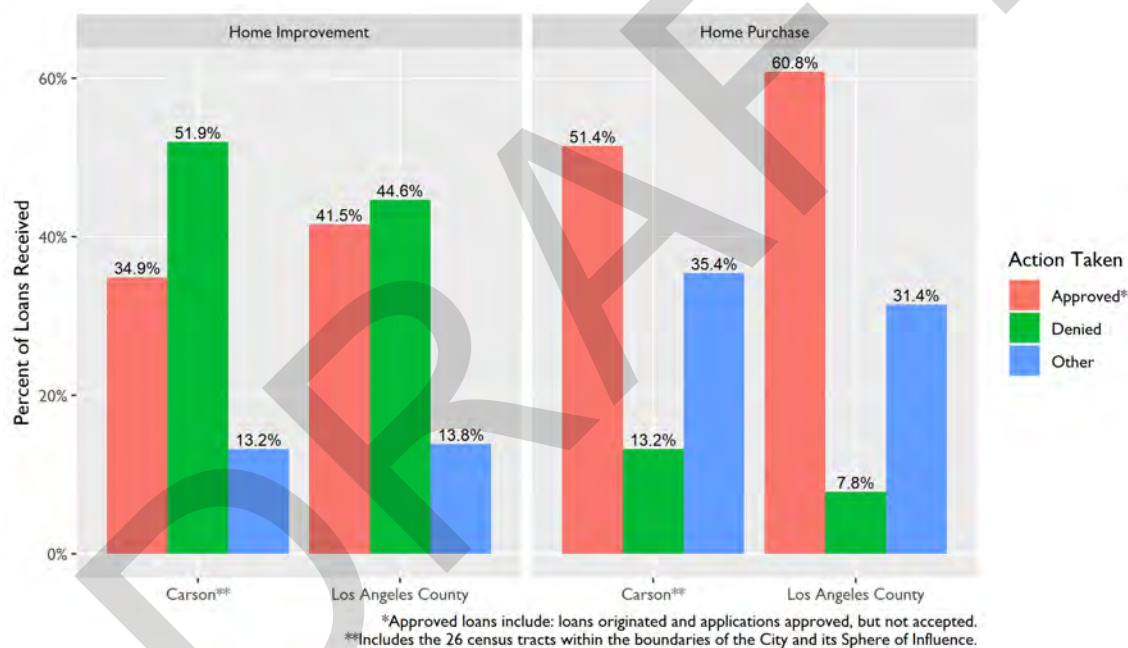
Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications as well as the income, gender, and race/ethnicity of loan applicants. A total of 1,381 loan applications were submitted to lenders for the purchase of homes in Carson during 2019. Approximately 51.4 percent of home purchase loan applications were approved and approximately 13.2 percent were denied. For approximately 35.4 percent of the applications some other action occurred, including withdrawal by the applicant and discarding of applications due to the incompleteness. There was a total of 364 home improvement loan applications made to local lenders in Carson, of which 127 (34.9 percent) were approved and 189 (51.9 percent) were denied. See Chart 4-2 for these proportions.

In comparison to Carson, as shown in Chart 4-2, Los Angeles County had a total of 112,155 conventional mortgage loan applications submitted to local lenders for the purchase of homes in the County during 2019. Approximately 60.8 percent of the home purchase loan applications were approved and approximately 7.8 percent were denied. Some other action occurred for the

remaining 31.4 percent of applications. There was a total of 29,803 home improvement loans in the County, with approximately a 41.5 percent approval rate and a 44.7 percent denial rate, with some other action occurring for the remaining 13.8 percent.

Overall, as indicated above, home improvement loans have lower approval rates than home purchase loans within the city and the county. Denial rates for both purchase and improvement loans are higher in Carson than in the county. This may indicate a significant gap between those households wanting to improve their homes and those who were actually able to obtain conventional financing to complete such improvements. This indicates a need for the City to continue to offer financial assistance to households that cannot qualify for a conventional home improvement loan, in order to encourage and support the rehabilitation and preservation of Carson's existing affordable, owner-occupied housing stock.

Chart 4-2: City of Carson and Los Angeles County Home Purchase Loans, 2019



Source: HMDA, 2019

OTHER NON-GOVERNMENTAL CONSTRAINTS

In addition to those constraints previously discussed, there are a number of potential factors specific to Carson that could constrain affordable housing development. These include Not in my Backyard-ism (NIMBYism), discriminatory financial lending practices, labor shortages, and other economic factors. These are discussed below.

NIMBYism

NIMBYism is a phenomenon endemic to the development landscape in California. It describes the tendency of existing residents, especially homeowners, of a jurisdiction to oppose any development

within the community. This is often out of a desire to maintain the existing neighborhood character or high residential property values. Recent State laws related to the streamlining of the affordable housing approval process are often designed with this dynamic in mind, in order to ensure that affordable housing is not unduly constrained by the political influence of a community's vocal minority.

During outreach conducted for the General Plan, including in workshops to solicit input with expanded areas for multifamily and higher density mixed-use development, there was no meaningful community or decision-maker pushback against higher densities. In outreach conducted for the Housing Element, one participant described the existence of community pushback against lower-income housing, especially transitional and supportive housing for formerly homeless persons. However, this is not unique to Carson, and any NIMBYism has not been a significant constraint to development. For instance, the City has in recent years approved and built significant new higher density multifamily and mixed-use development, especially in the West Carson Street/Avalon Boulevard area. As seen in Table 4-14, major projects under construction include the 300-unit Evolve South Bay/MBK Homes Apartments multifamily residential project (26 du/ac), the 357-unit Union South Bay mixed-use residential development (65 du/ac), and the 51-unit Veterans Village mixed-use residential development (43 du/ac). The Carson Arts Project, the Bella Vita, and the Veterans Village projects all contain affordable units. Further, the market-rate Renaissance project near City Hall will be converted into a 150-unit affordable "workforce housing" project. Union South Bay was also recently converted to moderate-income workforce housing through a public-private partnership.

Table 4-14: Major Residential Development Projects in Carson

<i>Address</i>	<i>Project Name</i>	<i>Development Type</i>	<i>Units</i>	<i>Acres</i>	<i>Density (du/ac)¹</i>
Completed					
21205 S. Main St.	Carson Arts Project	Multifamily residential ²	46	1.8	26
21801 Vera St.	Vera Lane	Single-family residential	18	1.2	15
402 E. Sepulveda Blvd.	Bella Vita	Mixed-use residential ²	65	1.1	55
Under Construction					
20330 S. Main St.	Evolve South Bay/MBK Homes Apartments	Multifamily residential	300	11.7	26
21521-21601 S. Avalon Blvd.	Union South Bay	Mixed-use residential	357	5.5	65
600 W. Carson St.	Veterans Village	Mixed-use residential ²	51	1.2	43
Approved					
123 E. 223rd St.	223rd Condos	Multifamily residential	9	0.5	20
427 E. 220th St.	Cambria Court Residential Project	Multifamily residential	35	3.1	12

Table 4-14: Major Residential Development Projects in Carson

<i>Address</i>	<i>Project Name</i>	<i>Development Type</i>	<i>Units</i>	<i>Acres</i>	<i>Density (du/ac)¹</i>
1007 E. Victoria St.	Brandywine Residential Project	Multifamily residential	36	1.6	23
21809 – 21811 S. Figueroa St.	Birch Specific Plan	Multifamily residential	32	0.8	40
Northeast Corner of Central Ave. and Victoria St.	Carson Landing Townhomes	Multifamily residential	175	8.1	22
Under Review					
20400 Main St.	The District at South Bay 2021 ³	Mixed-use residential	1,550	168.0	60-80
21240-21250 S. Main St.	Carson Lofts	Multifamily residential	19	0.5	38
	Imperial Avalon Specific Plan		1,240	27.3	46
225 W. Torrance Blvd.	Torrance/Main Specific Plan	Urban residential or mixed-use residential	356	5.5	65

1. Rounded upwards to the nearest whole number.

2. Includes affordable housing.

3. The District at South Bay Specific Plan was originally adopted in 2006 and amended in 2011. The estimate provided here includes all planned residential units and the acreage of the entire site. Residential development will only occur on a designated portion of the site.

Source: City of Carson, Community Development Department

Lending Practices

As discussed in the Market Constraints section of this Chapter, lending patterns in Carson can have a significant impact on the ability of residents to afford home purchases. Discriminatory lending practices would unduly constrain low-income residents and residents of color from purchasing or improving their homes. According to HMDA data, lending institutions have denied home purchase loans at a higher rate in Carson (13.2 percent) when compared to Los Angeles County (7.8 percent). Home improvement loans similarly have higher denial rates at the city level (51.9 percent) when compared to the county (44.7 percent). Further, as is discussed in Chapter 3 of this Housing Element, during the 2012 to 2019 period American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, and Black or African American home loan applicants in Carson received denial rates higher than overall applicants. In 2018 and 2019 Hispanic or Latino applicants also received higher denial rates. This demonstrates a pattern of racially/ethnically discriminatory lending in the city which are similar to those found in the broader Los Angeles County region.

The City can reduce the constraint imposed by discriminatory lending practices by carrying out its mandate to affirmatively further fair housing. Chapter 3 outlines some specific actions the City can take to reduce the impacts of this constraint, which are outlined in Program 14.

Shortage of Labor

Shortage of labor can significantly increase the cost of development in a jurisdiction, as it increases both labor costs and extends the time necessary to complete development. Carson is part of the vast Los Angeles-Long Beach-Glendale Metropolitan Division, with labor availability generally paralleling that in the broader metropolitan region. Estimates from the 2015-2019 American Community Survey estimate that there are 2,405 persons employed in the construction industry in Carson, representing 5.4 percent of the labor force that year. According to annual average estimates for 2020 by the California Employment Development Department (EDD), the unemployment rate for Carson was 13.6 percent, while it was 12.8 percent for the county. These numbers approach those seen in 2010 during the height of the Great Recession, with an estimated 15.8 percent and 12.5 percent respectively. These unusually high unemployment rates (in September 2017, Carson had an unemployment rate of 6.3 percent) are likely the result of the COVID-19 health emergency and economic crisis. Overall unemployment rates in the metropolitan region have declined since, but still remain at 10.6 percent as of June 2021, indicating continued slack and overall availability of labor.

Other Economic Factors

The economic crisis caused by the COVID-19 pandemic will likely have significant impacts on housing needs throughout the city. For example, the loss of a job makes a resident less likely to be able to afford the costs of rent or a mortgage. Further, the pandemic has further increased the urgency and necessity of providing shelter for persons experiencing homelessness within the city. The COVID-19 health emergency is likely to influence future building patterns and preferences, which may increase costs of development.

While the City does not have control over either the spread of the pandemic or the resulting economic conditions, it is able to provide programs to help ameliorate some of the impacts that may befall Carson residents. Programs to promote housing affordability across all income levels are included in the Housing Action Plan of this Housing Element.

5 Housing Resources

This chapter describes and analyzes resources available for the development, rehabilitation and preservation of housing in Carson. The following sections provide an overview of the availability of residential sites for future housing, financial and administrative resources to support the provision of affordable housing, and additional housing resources or considerations relevant for the provision of housing in the city.

5.1 Availability of Sites for Housing

A critical component of the Housing Element is the inventory of housing opportunity sites and an analysis of the capacity of those sites to accommodate the City's Regional Housing Needs Assessment (RHNA) allocation as determined by the Department of Housing and Community Development (HCD) and the Southern California Association of Governments (SCAG). The 2021-2029 Carson Housing Sites Inventory (Inventory) is included in Appendix C together with a detailed explanation of methodology and figures showing the location and spatial distribution of sites throughout the community.

LEGAL REQUIREMENTS FOR INVENTORY AND SITES

To meet RHNA allocations, State law requires that a jurisdiction identify an adequate number of sites to accommodate and facilitate housing production. To determine whether the City has sufficient land to accommodate its share of regional housing needs for all income groups, the City must identify "adequate sites." Land considered suitable for residential development includes the following:

- Vacant sites zoned for residential use;
- Vacant sites zoned for nonresidential use that allow residential development;
- Residentially zoned sites that are capable of being developed at a higher density (non-vacant sites, including underutilized sites);
- Sites owned or leased by a city, county, or city and county; and
- Sites zoned for nonresidential use that can be redeveloped for residential use and a program is included in the Housing Element to rezone the site to permit residential use within three years of adoption.

Further, State law stipulates criteria for the adequacy of sites included on the inventory, including that they be zoned to accommodate housing, have appropriate development standards, and be served by public facilities as needed to facilitate the development of a variety of housing products suitable for all income levels. Sites must also be identified in a manner that is consistent with a jurisdiction's duty to affirmatively further fair housing, which is further discussed in Chapter 3 of this element. A detailed discussion on the methodology of site selection and the determination of realistic capacity is available in Appendix C.

COMPARISON OF SITE INVENTORY WITH RHNA

According to SCAG, Carson has a regional housing need of 5,618 units during the 2021-2029 planning period. This includes 1,770 units for very low-income households, 913 units for low-income households, 875 units for moderate-income households, and 2,060 units for above moderate-income households. Per AB 2634, jurisdictions are mandated to calculate the subset of the very low-income regional need that constitutes the needs for extremely low-income housing. To determine this subset, jurisdictions may assume that 50 percent of the very low-income category is represented by extremely low-income households, or those making less than 30 percent of Area Median Income (AMI). The extremely low-income housing need in Carson is approximately 885 units. The City's progress toward RHNA for the 2021-2029 planning period as well as its remaining need is summarized in Table 5-1 below.

Table 5-1: Progress Toward the 2021-2029 RHNA

<i>Income Category¹</i>	<i>Under Construction</i>	<i>Approved</i>	<i>Under Review</i>	<i>Projected ADUs²</i>	<i>Total Credits</i>	<i>Number of Units</i>	<i>Remaining Need</i>
Very Low Income (0-50% AMI)	0	0	0	48	48	1,770	1,722
Low Income (51-80% AMI)	0	0	0	120	120	913	793
Moderate Income (81-120% AMI)	0	0	1,138	17	1,155	875	-280
Above Moderate Income (>120% AMI)	0	292	1,727	95	2,114	2,060	-54
Total	0	292	2,865	280	3,437	5,618	2,181

1. Income levels were determined by county median household income. Based on 2013-2017 ACS data, SCAG used a median income of \$61,015 in Los Angeles County to determine allocations.

2. ADU – accessory dwelling unit.

Source: SCAG Regional Housing Needs Assessment, 2020; City of Carson, 2021

Table 5-2: Sites Inventory Summary

City of Carson 2021-29 Housing Element Sites Inventory Summary Pipeline, Projected ADUs and Remaining Vacant/Non-Vacant Sites																											
	Low and Very Low Income								Moderate Income								Above Moderate Income										
	LDR	MDR	HDR	DMU	CMU	FLX	Subtotal	% RHNA	LDR	MDR	HDR	DMU	CMU	FLX	Subtotal	% RHNA	LDR	MDR	HDR	DMU	CMU	FLX	Subtotal	% RHNA			
Under Construction	0	0	0	0	0	0	0	0.0%	0	0	0	0	0	0	0	0.0%	0	0	0	0	0	0	0	0.0%			
Approved	0	0	0	0	0	0	0	0.0%	0	0	0	0	0	0	0	0.0%	0	76	184	0	32	0	292	14.2%			
Under Review	0	0	0	0	0	0	0	0.0%	0	0	0	496	0	642	1,138	130.1%	0	0	0	744	19	964	1,727	83.8%			
Total Pipeline	0	0	0	0	0	0	0	0.0%	0	0	0	496	0	642	1,138	130.1%	0	76	184	744	51	964	2,019	98.0%			
Projected ADUs								168	6.3%								17	1.9%								95	4.6%
Total RHNA Credits								168	6.3%								1,155	132.0%								2,114	102.6%
RHNA								2,683									875									2,060	
Surplus/Shortfall								-2,515									280									54	
Vacant	0	0	0	16	75	76	167	6.2%	0	0	0	14	0	0	14	1.6%	14	28	0	0	0	0	42	2.0%			
Non-Vacant	0	0	18	1,852	278	450	2,598	96.8%	0	0	0	170	5	0	175	20.0%	0	0	0	219	11	0	230	11.2%			
Realistic Capacity								2,765	103.1%								189	21.6%								272	13.2%
Total Site Capacity	2,933							109.3%	1,344							153.6%	2,386							115.8%			
GRAND TOTAL	6,663																										
TOTAL RHNA	5,618																										
% TOTAL RHNA	118.6%																										

Notes:

BRMU removed from summary table - no sites included in the Inventory.

No pipeline projects contain Low and Very Low Income units.

While sufficient credit towards the moderate- and above moderate-income RHNA has been met, there is a shortfall of lower-income units. The City has identified sufficient sites to meet its remaining RHNA need for this income category based on the land use designations of the General Plan Update. The applicable zones will be updated in the Zoning Ordinance following adoption of the General Plan within three years of the Housing Element statutory deadline of October 15, 2021. Based on a parcel-level analysis discussed in detail in Appendix C, the inventory contains both vacant and non-vacant sites with the potential for redevelopment. In addition to the required sites, a sufficient buffer of units has been included to ensure that the City will have the continued ability to meet the RHNA by income group throughout the planning period. As shown in Table 5-2, the Inventory has identified enough sites to accommodate overall 6,663 units or 118.6 percent of RHNA for the planning period, with sufficient buffers for each income category.

5.2 Financial Resources

There are a variety of potential funding sources available for housing activities in general. Due to both the high costs of developing and preserving housing and limitations on both the amount and uses of funds, a variety of funding sources may be required. The following describes in detail the two primary local funding sources for housing currently used in the City of Carson including Carson Housing Authority Funds and City CDBG funds. These sources could potentially be used to assist in the support and development of affordable housing.

CARSON HOUSING AUTHORITY FUNDS

Low- and moderate-income housing set-aside funds are one of the primary sources of financing used for the preservation, improvement, and development of affordable housing. Following the dissolution of Redevelopment Agencies statewide in 2012, the Carson Housing Authority (CHA) was elected as successor agency in charge of the management of these set-aside funds and all housing assets of the former Carson Redevelopment Agency.

The CHA provides assistance through the use of federal, State and local funds, to partner with developers to create and preserve affordable housing in the City of Carson. Projects assisted by the CHA include multifamily, senior and for-sale housing. As part of the Low and Moderate Income Asset Fund (also referred to as the Carson Housing Authority Special Revenue Fund), the CHA had about \$6.64 million in cash balances, including about \$3.77 million in bond proceeds, to be used for the development and preservation of affordable housing during Fiscal Year 2019-2020. Projects assisted by the CHA are available in Table 5-3 below.

Table 5-3: Carson Housing Authority Projects

<i>Name</i>	<i>Type</i>	<i>Number of Units</i>
Existing Affordable Housing Sites		
Carson City Center	Senior Affordable (Rental)	86
Villagio	Family Affordable (Rental)	149
Carson Terrace	Senior Affordable (Rental)	61
Avalon Courtyard	Senior Affordable (Rental), 62+ years	91
Via 425	Family Affordable (Rental)	105
Arbor Green	Family Affordable (Rental)	40
Bella Vita/Sepulveda Senior Housing	Senior Affordable (Rental)	65
Newly Completed Affordable Projects		
Veterans Village	Family Affordable (Rental)	50
Carson Arts Colony	Family Affordable Housing	46
Market Rate		
The Renaissance at City Center	Market Rate Apts. (Rental)	150
Veo/Sold Out	Single Family Residential & Condominiums (For Sale)	129
Other Housing Opportunities		
Carson Garden Retirement Apartments	Senior	-
Camino Village Senior Complex	Senior	-

Source: Carson Housing Authority, September 2020

CHA Funds and other grant funds will be used in a variety of ways to facilitate the development and preservation of affordable housing. The City recognizes that the development of affordable housing cannot be accomplished through the efforts of the City alone. Partnerships must be developed with other private and governmental funding agencies, as well as with private for-profit and non-profit housing developers.

The most recent projects assisted by the CHA are the Carson Arts Colony and Veteran's Village. Carson Arts is an affordable apartment community for working artists and their families, offering art-creation space and amenities, a peer-to-peer learning environment, and a purpose-built gallery and performance space with a curated exhibition and event schedule. The 46-unit apartment project has set aside 23 units, including one-, two-, and three-bedroom units, for households earning 60 percent or less of the area median income. Buildings two and three of the three-building complex are completed. The CHA provided financial assistance to enable the owner to offer units that will serve extremely low- and low-income households. The complex was issued its certificate of occupancy December 24, 2019.

Veteran's Village features a four-story building with 51 apartments including one-, two- and three-bedroom units reserved for veterans earning up to 60 percent of the area median income. The CHA's financial assistance to the project was limited to households earning 30 to 50 percent of the median income. The project also includes 2,500 square feet of ground-floor retail, a community room, and a 73-car garage. A certificate of occupancy was issued December 30, 2019.

COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS

Through the Community Development Block Grant (CDBG) program, the Department of Housing and Urban Development (HUD) provides funds to local governments for funding a wide range of community development activities. Carson anticipates receiving approximately \$793,000 in CDBG entitlement funds during program year 2021, per the 2021-2022 Annual Action Plan. The CDBG funds are utilized to fund housing rehabilitation programs, public service activities, capital improvement projects and administration. The Neighborhood Pride Program (NPP) is one of the programs which receives funding from the City's annual allocation of CDBG funds. The NPP is designed to assist low- and moderate-income owners of single-family detached dwellings and mobile homes with the preservation of decent, safe and sanitary housing. The NPP corrects hazardous structural conditions, makes improvements considered necessary to eliminate blight, promotes the construction of healthy, sustainable and resource-efficient housing, improves disabled access, and corrects building, and health and safety code violations. Program funds may be used to complete required and approved housing rehabilitation construction repair activities and addressing lead-based paint hazards, and includes all CDBG eligible project-related soft costs, including but not limited to, hazardous materials testing fees, title fees, and document recordation fees. The City estimates that at least 25 single-family units and mobile home units (25 low- and moderate-income households) will be rehabilitated during program year 2021.

OTHER SOURCES OF FUNDING

Another source of housing assistance in the City of Carson is through the local Public Housing Authority (PHA). The Los Angeles County Development Authority (LACDA) carries out the role of the PHA in Carson. LACDA manages over 3,600 units of public housing in properties throughout Los Angeles County (none in Carson), and also provides rental assistance to over 20,000 families within the county. Rental assistance includes the Section 8 Housing Choice Voucher rental subsidy program for both tenant-based and project-based assistance. LACDA provides rental assistance through the Section 8 program to about 300 families in Carson.

The HCD-administered Home Investment Partnerships Program (HOME) is also another source of funding in Carson. HOME funds are used to preserve and improve existing housing through the Owner-Occupied Rehabilitation (OOR) Program. In 2020, the City of Carson received \$500,000.00 in a HOME program grant award from HCD. All program funds were required to be expended by June 30, 2021. The City offered deferred payment loans to low income owner-occupants to pay for rehabilitation to single-family homes located within the boundaries of the city. The City has received this funding in the past and will continue to seek new HOME Investment Partnership Program funding.

In December 2020, the City entered into a Memorandum of Agreement (MOA) with Los Angeles County to form the Carson Enhanced Infrastructure Financing District (EIFD). In concept, the EIFD would implement a 20 percent affordable housing set-aside for the acquisition, construction, or rehabilitation of lower- and moderate-income housing. The Carson EIFD Public Financing Authority will coordinate with the CHA for the implementation and administration of these funds and projects.

In addition, Carson has allocated CARES Act emergency funding to provide rental assistance grants to income eligible individuals and families residing in the city and economically impacted during the COVID-19 pandemic through job loss, furloughs or deduction in hours or pay. Rental Emergency grants of up to a maximum of \$10,000 are made on behalf of the income eligible applicant, to maintain housing and/or to reduce rental payments in arrears as a result of the economic downturn during the COVID-19 pandemic.

Table 5-4 provides a non-exhaustive list of additional potential funding sources that are available for housing activities and community development activities. Resources are divided into four categories: federal, State, county, and private.

Table 5-4: Resources Available for Housing and Community Development Activities

<i>Program Name</i>	<i>Description</i>
Federal Programs	
Community Development Block Grant (CDBG)	HUD-provided annual grant program for housing and community development activities.
Housing Choice Voucher (Section 8) Program	Rental vouchers administered by local public housing agencies and funded by HUD. The vouchers can be used by lower-income families in any eligible housing unit, including private market rate units.
Section 202 Supportive Housing for the Elderly	HUD-provided funding to non-profit developers of supportive housing for the elderly.
Section 811 Supportive Housing for Persons with Disabilities	HUD-provided funding to non-profit developers of rental housing with the availability of supportive services for very low- and extremely low-income adults with disabilities.

Table 5-4: Resources Available for Housing and Community Development Activities

<i>Program Name</i>	<i>Description</i>
Federal Housing Administration (FHA) Mortgage Insurance Origination	HUD-administered programs to insure mortgages for various types of housing, including Section 207 Rental Housing, Section 207 Manufactured Home Parks, Section 231 Cooperative Units, Section 220 Rental Housing for Urban Renewal and Concentrated Development Areas, Section 221(d)(4) New Construction or Substantial Rehabilitation of Rental Housing, Section 207/223(f) Purchase or Refinancing of Existing Multifamily Housing Projects, Section 223(a)(7) Refinancing of Existing Multifamily Rental Housing, Section 231 Rental Housing for the Elderly, Section 234(d) Mortgage Insurance for Construction or Substantial Rehabilitation of Condominium Projects, Section 241(a) Supplemental Loan Insurance for Multifamily Rental Housing, Section 542(b) Qualified Participating Entities Risk-Sharing Program, Section 542(c) Housing Finance Agency Risk-Sharing Program, Section 232 and Section 232/223(f) Mortgage Insurance for Nursing Homes, Intermediate Care, Board & Care and Assisted-living facilities.
Low Income Housing Tax Credit (LIHTC)	Established in 1986, the LIHTC program makes tax credits available to individuals and corporations that invest in low-income rental housing. Usually, the tax credits are sold to corporations with a high tax liability and the proceeds from the sale are used to create the housing. The program is able to finance the construction and rehabilitation of low-income housing by providing sufficient incentive to private developers and investors.
State Programs¹	
Home Investment Partnerships (HOME) Funds	HCD-administered program that uses HUD funding to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low- and very low-income households. Funds are available in California communities that do not receive HOME funding directly from HUD.
SB2 Planning Grants	In 2017, Governor Brown signed the Building Homes and Jobs Act (SB2) to provide funding and technical assistance to local governments in California to streamline housing approvals and accelerate housing production.
Affordable Housing and Sustainable Communities (AHSC)	AHSC funds projects that support infill and compact development and reduce greenhouse gas (GHG) emissions. Funds are available annually in the form of loans and/or grants in two kinds of project areas: Transit Oriented Development (TOD) Project Areas and Integrated Connectivity (ICP) Project Areas.
CalHome	Grants to enable very low- and low-income households to become or remain homeowners. The City must apply for funds through HCD in response to periodic Notices of Funding Availability (NOFAs).
California Emergency Solutions and Housing (CESH)	CESH provides grant funds to eligible applicants for eligible activities to assist persons experiencing or at-risk of homelessness.

Table 5-4: Resources Available for Housing and Community Development Activities

<i>Program Name</i>	<i>Description</i>
Emergency Solutions Grants Program (ESG)	ESG makes grant funds available for projects serving homeless individuals and families through eligible non-profit organizations or local governments. ESG funds can be used for supportive services, emergency shelter/transitional housing, homelessness prevention assistance, and providing permanent housing. Funds are available in California communities that do not receive ESG funding directly from HUD.
Golden State Acquisition Fund (GSAF)	GSAF was seeded with \$23 million from the HCD's Affordable Housing Innovation Fund. Combined with matching funds, GSAF makes up to five-year loans to developers for acquisition or preservation of affordable housing.
Homekey	Homekey provides grants to local to acquire and rehabilitate a variety of housing types — such as hotels, motels, vacant apartment buildings, and residential care facilities — in order to serve people experiencing homelessness or who are also at risk of serious illness from COVID-19.
Housing for a Healthy California (HHC)	HHC provides funding on a competitive basis to deliver supportive housing opportunities to developers using the federal National Housing Trust Funds (NHTF) allocations for operating reserve grants and capital loans.
Housing-Related Parks Program	Funds the creation of new park and recreation facilities or improvement of existing park and recreation facilities that are associated with rental and ownership projects that are affordable to very low- and low-income households.
Infill Infrastructure Grant Program (IIG)	IIG provides grant funding for infrastructure improvements for new infill housing in residential and/or mixed-use projects. Funds are made available through a competitive application process.
Joe Serna, Jr., Farmworker Housing Grant (FWHG)	FWHG makes grants and loans for development or rehabilitation of rental and owner-occupied housing for agricultural workers with priority for lower-income households.
Local Early Action Planning (LEAP) Grants	The Local Early Action Planning (LEAP) program assist cities and counties to plan for housing through providing over-the-counter, non-competitive planning grants.
Local Housing Trust Fund Program (LHTF)	Affordable Housing Innovation's LHTF lends money for construction of rental housing projects with units restricted for at least 55 years to households earning less than 60 percent of area median income. State funds matches local housing trust funds as downpayment assistance to first-time homebuyers.
Mobilehome Park Rehabilitation and Resident Ownership Program (MPRRP) ²	MPRRP makes short- and long-term low interest rate loans for the preservation of affordable mobilehome parks for ownership or control by resident organizations, nonprofit housing sponsors, or local public agencies. MPRROP also makes long-term loans to individuals to ensure continued affordability. Funds are made available through a competitive process in response to a periodic NOFA.

Table 5-4: Resources Available for Housing and Community Development Activities

<i>Program Name</i>	<i>Description</i>
Multifamily Housing Program (MHP)	MHP makes low-interest, long-term deferred-payment permanent loans for new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households.
No Place Like Home (NPLH)	NPLH dedicates up to \$2 billion in bond proceeds to invest in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness.
Permanent Local Housing Allocation (PLHA)	PLHA provides a permanent source of funding to local governments to implement plans to increase the affordable housing stock through both formula grants and competitive grants.
Predevelopment Loan Program (PDLP)	PDLP makes short-term loans available for preservation, construction, rehabilitation or conversion of assisted housing primarily for low-income households. Availability of funding is announced through a periodic NOFA.
Supportive Housing Multifamily Housing Program (SHMHP)	SHMHP provides low-interest loans to developers of permanent affordable rental housing that contain supportive housing units.
Transit Oriented Development Housing Program (TOD)	The TOD program makes low-interest loans and grants for rental housing that includes affordable units that are located within one-quarter mile of a transit station. Applications are accepted in response to a periodic NOFA.
Veterans Housing and Homelessness Prevention Program (VHHP)	VHHP provides long-term loans to for-profit, non-profit and public agencies to develop or preserve rental housing for very low- and low-income veterans and their families.
California Tax Credit Allocation Committee (TCAC) State Tax Credits	TCAC facilitates the investment of private capital into the development of affordable rental housing for low-income Californians through State and federal tax credits. Tax credits are available to both individuals and corporations. The tax credits are sold to individuals or corporations with a high tax liability and the proceeds from the sale are used to create affordable housing.
California Housing Finance Agency (CalHFA) Multifamily Programs	CalHFA provides a variety of loan programs for different project types and income levels. Permanent Loan Programs include competitive long-term financing for affordable multifamily rental housing projects, where the Agency must be the Bond Issuer. CalHFA also offers the Conduit Issuer Program, which facilitates access to tax-exempt and taxable bonds by developers seeking financing for eligible projects that provide affordable multifamily rental housing, which can be used when another lender is involved. CalHFA offers the Bond Recycling Program to preserve and recycle prior years tax-exempt private activity bond volume cap to be accessed by developers that seek construction/rehabilitation financing for eligible projects that provide affordable multifamily rental housing.

Table 5-4: Resources Available for Housing and Community Development Activities

<i>Program Name</i>	<i>Description</i>
California Housing Finance Agency (CalHFA) Loan Programs	CalHFA provides a number of loan programs, including First Mortgage Programs and the Down Payment Assistance Program. The First Mortgage Programs include both government and conventional loans, while the Down Payment Assistance Program provides several options for down payment and closing cost assistance.
Independent Cities Lease Finance Authority (ICFA)	Carson is an associate member of the ICFA which provides down payment and/or closing cost assistance and assists qualified nonprofit organizations to acquire and manage multi-family housing communities, including manufactured home parks.
County Programs	
Los Angeles County Development Agency (LACDA) Programs	LACDA offers a variety of programs targeted towards homeowners, potential homebuyers, low-income renters, and those experiencing homelessness. This includes home improvement programs, the First-Time Homebuyers Assistance program, the Mortgage Credit Certificate (MCC) program, public housing, Section 8 administration, and funding for homeless services.
Private Resources/Financing Programs	
Federal National Mortgage Association (Fannie Mae)	A government-sponsored enterprise that provides a reliable source of affordable mortgage financing nationwide. Fannie Mae purchases mortgages from lenders and facilitates the flow of capital into the housing market.
Federal Home Loan Mortgage Corporation (Freddie Mac)	A government-sponsored enterprise that operates in the secondary mortgage market to ensure a reliable and affordable supply of mortgage funds.
California Community Reinvestment Corporation (CCRC)	Non-profit mortgage banking consortium designed to provide long term debt financing for affordable multi-family rental housing. Non-profit and for-profit developers contact member banks.
Federal Home Loan Bank (FHLB) Affordable Housing Program	Direct subsidies to non-profit developers, for-profit developers and public agencies for affordable low-income ownership and rental projects.
Community Reinvestment Act (CRA)	Federal law requires that banks, savings and loans, thrifts, and their affiliated mortgaging subsidiaries annually evaluate the credit needs for public projects in communities where they operate. This includes meeting the needs of borrowers in all segments of the communities, including low- and moderate-income neighborhoods.
<ol style="list-style-type: none"> 1. State programs include those considered active and either have funding currently available for application or will be announcing a notice of funding availability (NOFA) in the next 12 months. 2. MPRROP is currently accepting applications on an over-the-counter basis. 	

5.3 Administrative Resources

The provision of affordable housing in any community requires both financial resources as well as administrative resources. Housing programs require that a number of entities work together in partnership to bring the necessary resources together to provide for affordable housing. Provided below is a brief discussion of some of the administrative resources that the City has available to provide for housing programs.

With the dissolution of the Carson Redevelopment Agency along with all statewide Redevelopment Agencies, the CHA now administers the Agency's low-mod housing set-aside funds and remaining obligations. Housing units developed by the CHA must remain affordable to the targeted income group for a period of time not less than 55 years for rental housing and 45 years for owner housing. CHA staff meets with for-profit and non-profit housing developers for the purpose of discussing potential low- and moderate-income housing projects.

Housing development projects within Carson are managed by the Community Development Department. Through the coordinated effort of these divisions, the needs for affordable housing are assessed and planned for, proposed developments are regulated in accordance with the City's planning and zoning codes, and funding is available through the CHA. For-profit and non-profit housing developers are valuable resource partners in the development of affordable housing. The City has successfully worked with housing developers to complete affordable housing projects, including the Carson Arts Colony apartment project, the Veteran's Village project, and the conversion of 150 units at The Renaissance at City Center project into moderate-income workforce housing. In 2021, the City also successfully converted the 357-unit Union South Bay project into moderate-income workforce housing through a public-private partnership.

5.4 Other Housing Resources and Considerations

SURPLUS LANDS

The 2021-29 Housing Element Sites Inventory includes a number of sites owned by a local public entity. These sites include parcels in the Carson Civic Center (APNs 7337005927, 7337006919, and 7337007904; owned by the City of Carson and Los Angeles County), the remaining available land on the Victoria Golf Course (APN 7339017902; owned by Los Angeles County), the Brandywine pipeline project (APN 7319038900; owned by the City of Carson), the under review District at South Bay 2021 (APN 7336010903; owned by the Carson Reclamation Authority), two vacant small sites appropriate for Moderate Income housing (APNs 7343019900 and 7343019901; owned by the Carson Housing Authority), and two vacant small sites appropriate for Above Moderate Income housing (APNs 7404015905 and 7404015907; owned by the Los Angeles County Sanitation District No. 8). AB 1486 and AB 1255 seek to identify and prioritize State and local surplus lands available for housing development affordable to lower-income households.

Pursuant to Government Code section 54221, "surplus land" means land owned in fee simple by any local agency for which the local agency's governing body takes formal action in a regular public meeting declaring that the land is surplus and is not necessary for the agency's use. As of the

compilation of this Housing Element (September 2021), based on records from the Los Angeles County Assessor, the City has identified 605 sites, representing about 2,076.2 acres, within city limits that have local agency ownership. The existing use of 134 of these sites is for railroad facilities or right-of-way, representing about 411.4 acres. The remaining 471 sites are owned by local agencies, including:

- City of Carson (100 sites; 136.5 acres)
- Carson Housing Authority (42 sites; 17.6 acres)
- Carson Successor Agency (9 sites; 7.2 acres)
- Carson Reclamation Authority (2 sites; 147.6 acres)
- Los Angeles County (37 sites; 249.4 acres)
- Los Angeles County Flood Control District (85 sites; 184.1 acres)
- Los Angeles County Sanitation District No. 8 (53 sites; 345.5 acres)
- Los Angeles County Metropolitan Transportation Authority (29 sites; 53.9 acres)
- Los Angeles City Department of Water and Power (60 sites; 81.2 acres)
- City of Los Angeles (21 sites; 42.9 acres)
- Los Angeles Unified School District (38 sites; 191.3 acres)
- State of California (10 sites; 365.1 acres)

These sites are located in a diverse array of locations throughout the city with different 2040 General Plan Land Use designations and densities for potential residential development. It is noted that among these 471 sites, there are sites with the existing land use of open space/greenways/natural areas, utilities, and various industrial uses where residential development may not be suitable or desirable. There are, however, some sites with existing land use of school/educational facilities, public facilities, or vacant that could potentially accommodate residential redevelopment. The sites most suited for residential development are included in this Inventory. In accordance with AB 1486 and AB 1255, the City will work with the local agencies to determine whether there is surplus or excess land that is not necessary for the agency's use and may be identified as "surplus" for reporting to HCD and DGS with the intention of connecting developers to potential lands available for housing development affordable to lower-income households.

UTILITY AND SERVICE SYSTEMS

Consistent with State law and guidance from HCD, all RHNA sites included on the Inventory have been screened to ensure they are in areas with existing or planned water, sewer, and other dry-utilities supply, including the availability and access to distribution facilities. The capacity of water services, sewer and waste management, and electrical services is discussed further in Chapter 4.

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6 Housing Action Plan

This chapter contains goals, policies and programs to address housing-related issues in Carson, including achieving the City's identified housing needs and overcoming challenges and constraints. The chapter also includes quantified objectives to accomplish the established goals. An evaluation of the goals, policies and programs of the 2014-2021 Housing Element are included in Appendix D.

The goals, policies, and programs form the Housing Action Plan, and are intended to provide a framework for increasing the range of housing options in the community, removing barriers and constraints to housing construction, improving the condition of existing housing, and providing equal access housing opportunities and services to all residents.

6.1 Housing Goals and Policies

The Housing Element establishes the following goals and supportive policies. These goals and policies will serve as a guide to City officials in daily decision making. Some goals and policies are new, while others have been updated to reflect lessons learned since the prior Housing Element.

Goal 1: Maintain and rehabilitate Carson's existing housing stock.

- | | |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| Policy 1-1 | Encourage continued maintenance and repair of owner and rental housing through education and training programs on basic home maintenance. |
| Policy 1-2 | Promote the use of durable building materials and landscaping, with less need for ongoing repair and maintenance. |
| Policy 1-3 | Provide funding to support preventative maintenance, and repair and rehabilitation of owner- and renter-occupied housing. |
| Policy 1-4 | Educate homeowners about the rehabilitation assistance programs throughout the city. |
| Policy 1-5 | Continue to monitor federal, State, and regional programs and funding sources designed to improve housing conditions. |

Goal 2: Encourage the development of a variety of housing to meet needs of the broad spectrum of the community, with a particular emphasis on multifamily housing, and development standards that facilitate housing production.

- | | |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy 2-1 | Facilitate production of a variety of housing types in a diversity of settings and neighborhoods. |
| Policy 2-2 | Promote flexibility so that building design and development, as well as parking standards, are appropriate and do not present undue barriers to development feasibility. |
| Policy 2-3 | Improve the entitlement process to streamline and coordinate the processing of development permits, design review, and funding of housing projects. |

- Policy 2-4** Develop and maintain objective development standards, particularly concerning environmental issues such as noise, air quality and pollution, to mitigate constraints and facilitate housing production.
- Policy 2-5** Increase the number of owner-occupied units within condominiums and planned unit developments.
- Policy 2-6** Encourage California State University Dominguez Hills to build student, faculty and staff housing to meet the needs of their campus.

Goal 3: Preserve affordable housing “at risk” of conversion and promote additional affordable housing development.

- Policy 3-1** Continue to utilize federal and state subsidies to the fullest extent in order to meet the needs of lower-income residents.
- Policy 3-2** Provide support to nonprofit development corporations for the development of affordable housing.
- Policy 3-3** Preserve affordable units which are “at-risk” of conversion to market rate through county, State, and federal funding programs.
- Policy 3-4** Strive to preserve restricted low-income housing that is at risk of converting to non-low income use by: a) identifying financial resources available to preserve these units; and b) assisting interested agencies and/or tenant groups in forming partnerships and gaining access to financial and technical resources.
- Policy 3-5** Support the preservation and maintenance of mobile home parks to the extent permitted by applicable State law to prevent the displacement of lower-income households and provide relocation assistance when preservation is not feasible.
- Policy 3-6** Facilitate a mix of affordability levels in residential projects and dispersal of such units to achieve greater integration of affordable housing throughout the community.

Goal 4: Promote and preserve housing opportunities for persons with special needs, including lower-income households, large families, single parent households, disabled persons, the elderly, and persons experiencing homelessness.

- Policy 4-1** Promote the availability of housing which meets the special needs of the elderly, homeless, persons with disabilities and large families.
- Policy 4-2** Integrate and disperse special needs housing within the community and in close proximity to transit and public services.
- Policy 4-3** Reduce constraints to the development of housing suited for special needs groups, including residential care facilities.

Policy 4-4 Study the feasibility of requiring inclusionary affordable housing as part of market-rate housing developments and/or commercial and industrial housing linkage fee to promote housing for lower-income households.

Goal 5: Housing opportunities to all persons regardless of race, religion, ethnicity, ability, sex, age, marital status, household composition, or other arbitrary factor.

Policy 5-1 Reduce the prevalence of fair housing issues – including segregation, disability and access, disproportionate housing need, and fair housing enforcement and outreach – through appropriate changes to development standards, zoning codes, and increased education and outreach.

Policy 5-2 Continue to work with the City’s fair housing provider, the Housing Rights Center of Los Angeles, to disseminate information on fair housing and contact agencies.

Goal 6: Conserve natural resources and reduce energy consumption in all areas of residential development.

Policy 6-1 Educate the public about energy conservation and promote the use of alternative energy sources.

Policy 6-2 Encourage energy and water conservation in new residential developments.

Policy 6-3 Promote financial reimbursement programs for the use of energy efficient building products and appliances.

Policy 6-4 Promote integrated urban infill and transit-oriented development.

6.2 Housing Programs

While goals and policies provide policy direction, housing programs outline specific actions the City will take. Programs include both those currently in operation and new actions which have been incorporated to address the City’s housing needs. The following section describes the programs the City will enact to implement the Housing Action Plan.

PROGRAM 1: RESIDENTIAL REHABILITATION PROGRAM (NEIGHBORHOOD PRIDE PROGRAM)

The maintenance and preservation of Carson’s existing housing stock is accomplished through a combination of local, State, and federal funds. The Neighborhood Pride Program (NPP) is a major rehabilitation program in the City that provides financial assistance through loans and grants via Community Development Block Grant (CDBG) funding to provide basic housing repairs and remedy code violations. The NPP utilizes the bulk of allocated CDBG funds. Single-family homes and mobile home units

are eligible for funding. As part of the program, the City also provides lead-based paint testing and abatement to units undergoing rehabilitation. The City will continue to seek CDBG funds and carry out rehabilitation activities.

Responsible Agency: Carson Community Development Department; Carson Building & Safety Division

Potential Funding Source: General Fund; CDBG Funds;

Timeframe: Ongoing 2021-2029

Objectives: Assist a minimum of 25 single-family units and mobile home units annually during the planning period (200 housing units total over the eight-year planning period).

PROGRAM 2: HOME OWNER-OCCUPIED REHABILITATION PROGRAM

The Home Investment Partnership (HOME) program provides deferred payment loans to low- and very low-income homeowners. Loans allow lower-income homeowners to pay for the rehabilitation of single-family homes within city boundaries. While Carson is not an entitlement community for the Department of Housing and Urban Development (HUD) HOME program grants, it has previously obtained HOME funding through a grant from the State Department of Housing and Community Development (HCD). The City received a \$500,000 HOME grant which expired in June 2021 and will continue to pursue funding as available.

Responsible Agency: Carson Community Development Department; Carson Building & Safety Division

Potential Funding Source: HOME Funds; HCD

Timeframe: Ongoing 2021-2029 as available

Objectives: Continue to seek HOME funding as available and rehabilitate XX low- and very low-income households during the planning period.

PROGRAM 3: FORECLOSURE REGISTRATION PROGRAM

Although the foreclosure crisis instigated by the 2008 financial collapse is no longer as pressing as it was during the adoption of the previous Housing Element, the City has an interest in ensuring that foreclosed properties do not contribute to neighborhood blight. To do this, the City implements the Foreclosure Registration Program (FRP), which provides the authority to assess penalties for irresponsible property owners and provides financial resources to track and maintain vacant properties. The FRP charges a registration fee of \$450 per parcel to cover potential costs of remediation, with additional penalties if a lender fails to register their foreclosed properties. Upon transfer of the property, the deposit funds are returned unless fines were incurred by the property owner. The City contracts with a private firm to provide monitoring services. The City will continue to take preventative measures in future blight management and code violations by imposing a registration fee to cover potential costs of remediation.

Responsible Agency: Carson Community Development Department

Potential Funding Source: General Fund

Timeframe: Ongoing 2021-2029

Objectives: Register foreclosed residential properties as necessary and collect registration fees annually from financial institutions and beneficiaries.

PROGRAM 4: AFFORDABLE HOUSING STRATEGY

In order to promote accessible affordable housing and reduce affordability gaps in Carson, the City employs a number of approaches. This includes the development of new affordable units, including multifamily units, and the preservation and improvement of existing affordable units. Specific actions the City will undertake during the planning period include the following.

- Affordable Housing Financing** – The City primarily employs two funding sources to promote the development, preservation, and improvement of affordable housing: Carson Housing Authority (CHA) funds and CDBG funds. The City has successfully provided development assistance to a variety of housing types, including multifamily and mixed-use projects, through CHA funds. The rehabilitation of affordable housing units is discussed further in Program 1. The City also partners with other private and governmental funding agencies, as well as with private for-profit and non-profit housing developers. The City will continue to assess a variety of alternative funding mechanisms for the construction of new affordable housing including State, federal, and regional programs. The City will provide assistance in securing and implementing financing for for-profit and non-profit affordable housing developers. Further, following adoption of the 2040 General Plan, the City will undertake a comprehensive development impact fee study to establish ongoing fees. The City will consider the inclusion of a housing impact fee to ensure that sufficient housing is provided to accommodate job growth.
- City- and Other Publicly-Owned Land** – Carson encourages the use of publicly-owned land for the construction of affordable housing. During the previous planning period, the 51-unit affordable Veteran's Village project was developed on publicly-owned land. The City will also comply with State law, including AB 1486 and AB 1255, to connect developers with surplus or excess land. Ongoing coordination with developers to produce affordable housing on such land will be central to these efforts.
- Affordable Homeownership** – As discussed in Chapter 2, the housing affordability gap in Carson is particularly large for ownership units. The City supports homeownership opportunities for low- and moderate-income households through the Mortgage Credit Certificate Program (MCC) offered by the California Housing Finance Agency. The MCC program offers first-time home buyers a federal tax credit, which reduces the amount of federal taxes to be paid, thus assisting those home buyers to qualify for a mortgage loan. The City will continue to encourage the use of the program through education and coordination efforts, including providing information on the program at City Hall and on the City's website as well as ongoing coordination with lenders.
- Inclusionary Housing and Commercial & Industrial Development/Housing Linkage Fee Study** – Carson has an extraordinary amount of housing development in the pipeline, including several projects at high densities. However, there remains a gap between what the market is providing and what lower-income households can afford. The new General Plan significantly increases allowable higher densities, and other policies and actions call for review of constraints, including lowering certain parking requirements. However, to ensure that housing affordable to lower-income households is ultimately built, the City could consider requiring a certain percentage of housing units in developments to be income-restricted. For example, Los Angeles County in November 2020 adopted an inclusionary ordinance that requires 5% to 20% of the unit count, depending on the affordability level of the units and the project size, to be income-restricted. Similarly, the City of Los Angeles charges an Affordable Housing Linkage Fee on certain new market-rate residential and commercial development to generate local funding for affordable housing. This study would look at examples of what has been successful in other communities in

the region, Carson-specific market conditions, the City's economic development objectives, and the General Plan goals of a balanced community.

Responsible Agency: Carson Community Development Department; Carson Planning Division; Carson Housing Authority; California Housing Finance Agency

Potential Funding Source: Carson Housing Authority Funds; CDBG; HUD; HCD; State of California Housing Bond Funds; private sector funds

Timeframe: Ongoing 2021-2029

Objectives:

- Identify financing mechanisms that can facilitate the development of new affordable housing.
- Identify suitable sites for housing development and encourage development on those sites.
- Sustain affordable home ownership opportunities in the City of Carson.
- Explore feasibility of inclusionary housing and commercial and/or industrial development/housing linkage fee.

PROGRAM 5: ZONING ORDINANCE UPDATE

The City's Planning and Zoning Code contains standards and other provisions for residential developments in the city. The Code is undergoing a comprehensive update to reflect the 2040 General Plan, which is being updated in parallel with this Housing Element. In addition to implementing the new General Plan, the Zoning Code update will also help to overcome several governmental constraints to development in Carson, as discussed in Chapter 4 of this element. Amendments to facilitate housing production would include:

- **Multifamily Development Standards** – The City currently (2021) requires a Conditional Use Permit (CUP) for all multifamily development, including residential condominiums. Pursuant to recent changes in State law, as codified in Government Code Section 65583, the City shall permit by right development of multifamily, transitional, and supportive housing in all zones where multifamily housing is permitted in the General Plan – including the RM, MU-CS, and MU-SB zones as well as the MUR overlay.
- **Residential Condominiums** – The City currently maintains development standards for residential condominiums in Article IX, Chapter 3 of the Carson Municipal Code which differ from the standards required for other types of multifamily development. The City will simplify its zoning standards and ensure equivalent standards for multifamily developments during the update to the Planning and Zoning Code following adoption of the 2040 General Plan. However, the City maintains a valid interest in regulating and placing restrictions on condominium conversions. Currently, the City provides density bonus incentives for such conversions pursuant to Section 9404 of the Planning and Zoning Code. The City will explore the adoption of a separate ordinance that regulates condominium conversions, including potential requirements like the approval of a CUP.
- **Parking Standards Review** – The City will undertake a review of its parking regulations to ensure no undue constraints to development exist. In particular, the City shall consider reducing minimum parking standards in the Planning and Zoning Code, where necessary, to appropriately match future development patterns in Carson. Amendments to parking standards could include

those related to smaller residential units, mixed-use developments, and developments in proximity to transit. Current parking standards require two spaces for each multifamily unit, with additional guest spaces based on the number of bedrooms. Multifamily units within a Mixed-Use (MU) District require one covered space for every studio and two covered spaces for each unit with one or more bedrooms. Appropriate parking standards may include a reduction to one space for studio and one-bedroom units, and 1.5 spaces for two-bedroom units, as well as allowing tandem parking where the spaces are for a single unit.

Responsible Agency: Carson Community Development Department and Carson Planning Division

Potential Funding Source: Update funded and underway

Timeframe: Amend the Planning and Zoning Code within one year of adoption of the 2040 General Plan

Objectives: Remove identified governmental constraints to development.

PROGRAM 6: STREAMLINED DEVELOPMENT STANDARDS

The City can facilitate the development of housing by implementing streamlined development and review standards. Certain projects, including those containing units affordable to lower-income housing, may be subject to streamlining requirements pursuant to State law. Streamlining will decrease both the costs and time associated with residential development in Carson. Specific actions the City can take to simplify its standards and review process are outlined as follows.

- **Streamlined Review of Affordable Housing** – The City will adopt procedures to expedite the review and approval of affordable housing projects. This includes the development of an application process, subject to the Housing Accountability Act, that allows completely affordable housing projects to be reviewed through an administrative process. The City will also adopt an eligibility checklist for SB 35 requirements, which creates a streamlined and ministerial approval process for certain housing projects pursuant to Government Code Section 65913.4. The City will continue to work to reduce review and permitting times.
- **Objective Environmental Development Standards** – Objective design standards for residential development are required under State law. Related to environmental quality issues, the City currently promotes objective standards in the Oil and Gas Ordinance (Article IX, Chapter 5, Part 3 of the Carson Municipal Code) and in the General Plan. As part of the 2040 General Plan, the City will maintain objective environmental development standards to mitigate impacts from industrial and other uses in sensitive areas in Carson. The 2040 General Plan includes air quality and noise standards, including performance-based noise standards for noise-generating uses. The Planning and Zoning Code will be updated to reflect such standards following adoption of the General Plan.

Responsible Agency: Carson Planning Division

Potential Funding Source: General Funds; SB2 and LEAP Grants

Timeframe: Amend the Planning and Zoning Code within one year of adoption of the 2040 General Plan; Incorporate an SB 35 eligibility checklist by 2023; Ongoing 2021-2029

Objectives: Remove constraints to the development of affordable housing and comply with State law that promotes streamlined development; Mitigate and reduce environmental constraints while facilitating development.

PROGRAM 7: DENSITY BONUS

The City amended the Planning and Zoning Code in 2010 to include a Density Bonus Program (Article IX, Chapter 4). Following adoption of the 2040 General Plan, the Planning and Zoning Code will be amended to ensure that the Density Bonus Program remains in compliance with State law and incorporates additional density bonuses available through provision of community benefits. The 2040 General Plan will allow an increase in residential density with community benefits in the MDR, HDR, DMU, CMU, BMRU, and FLX land use designations. It will also set a minimum residential density in the MDR and HDR land use designations. The City will coordinate with developers to encourage utilization of density bonuses, and provide information about the program at City Hall and on its website.

Responsible Agency: Carson Planning Division

Potential Funding Source: General Fund

Timeframe: Amend the Planning and Zoning Code within one year of adoption of the 2040 General Plan; Ongoing 2021-2029

Objectives: Foster the development of higher density affordable housing where appropriate.

PROGRAM 8: ACCESSORY DWELLING UNITS

The City implements development standards for accessory dwelling units (ADUs), also called “second dwelling units”, through Sections 9122.8 and 9125.6 of the Planning and Zoning Code. Following adoption of the 2040 General Plan, the City will amend the Planning and Zoning Code to ensure compliance with recent State law and remove development constraints, including but not limited to parking standards.

The City will also implement strategies to encourage the development of ADUs in Carson, especially those suitable for lower-income households. The City will continue to inform eligible property owners through updated brochures and posting of information on the City's website of opportunities to develop ADUs, as well as City and State development requirements for these units. Additional strategies may include allocating CDBG funds for illegal garage conversions to bring units up to code and seeking CalHome funding to provide rehabilitation assistance to ADUs.

Responsible Agency: Carson Community Development Department and Carson Planning Division

Potential Funding Source: General Fund; CDBG; CalHome

Timeframe: Amend the Planning and Zoning Code within one year of adoption of the 2040 General Plan; Ongoing 2021-2029

Objectives: Ensure compliance with State law, with anticipated 35 ADUs annually based on recent development trends (280 ADUs over an eight-year period).

PROGRAM 9: ADEQUATE RESIDENTIAL SITES AND NO NET LOSS

Carson has been allocated a Regional Housing Needs Allocation (RHNA) of 5,618 units for the 2021-2029 planning period. As discussed in Chapter 5 and Appendix C, 3,437 units may be credited towards the RHNA with significant surpluses for moderate- and above moderate-income housing. There is a shortfall of 2,515 lower-income units.

The City is currently conducting a comprehensive update to the General Plan, which will increase residential development capacity within Carson. The 2040 General Plan will substantially increase the

maximum permitted residential densities in several land use designations. Sites identified to accommodate lower-income housing are conservatively projected to develop at densities between 25 and 44 dwelling units per acre. This will be more than adequate to accommodate the City's remaining RHNA. The 2021-2029 Carson Housing Sites Inventory, available in Appendix C, estimates a total development capacity of 118.6 percent of the RHNA – including 109.3 percent of lower-income units, 153.6 percent of moderate-income units, and 115.8 percent of above-moderate income units.

The City will continue to maintain and monitor the sites inventory. The City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to the “No Net Loss” provisions set forth in Government Code Section 65863. Should the approval of a development result in a reduction of capacity or assumed affordability below the residential capacity needed to accommodate the lower-income RHNA of 2,683 units, the City will identify and zone sufficient sites to accommodate the shortfall. The City will also make the residential sites inventory available on the City's website to non-profit and for-profit housing developers.

Responsible Agency: Carson Planning Division

Potential Funding Source: General Fund

Timeframe: Rezone sites within one year of adoption of the 2040 General Plan as part of the comprehensive Planning and Zoning Code update; Develop an evaluation procedure by 2022; Ongoing 2021-2029

Objectives: Provide and maintain adequate sites to accommodate the City's RHNA and affordable housing goals.

PROGRAM 10: PRESERVATION OF AT-RISK AFFORDABLE HOUSING UNITS

According to Carson Housing Authority and HUD data, Carson has two affordable housing developments with 130 assisted units at some risk of conversion to market rate. “At-risk” units are those in which the subsidy or contract with the project may expire during the 10-year period between 2021 and 2031. The Carson Garden Apartments contain 100 assisted units at moderate risk of conversion and Grace Manor contains 30 assisted units at very high risk. Both projects are assisted by HUD; all projects assisted by the Carson Housing Authority are at low risk of conversion. Risk level is derived from the California Housing Partnership.

The City will continue to monitor at-risk housing, inform tenants of potential conversion to market rate status, and educate tenants on the potential purchase of units. When units assisted by the Carson Housing Authority are at risk of converting to market rate housing, the City will contact the owners of such units to assess the owner's intent to prepay a federally-assisted mortgage or to renew or opt out of project-based Section 8 contracts. The City will encourage owners to consider renewal of HUD Section 8 contracts. For owners who want to opt-out of a Section 8 contract, prepay a HUD subsidized mortgage or sell their property upon the expiration of the rental subsidy, the City shall require the provision of 18-24 months advanced notice to tenants. The City will inform tenants of the potential conversion of their units to market rate, and provide education on the potential tenant purchase of units. The City will also pursue financing and subsidy programs at the State, county, and federal levels to preserve at-risk housing, including through the purchase of affordability covenants.

The City will also comply with the unit replacement provisions of SB 330 which require that protected units, including those subject to rent control or stabilization, be replaced with comparable affordable units by the development project that proposes to demolish such protected units.

Responsible Agency: Carson Housing Authority and Carson Community Development Department

Potential Funding Source: Carson Housing Authority Funds; HUD; HCD

Timeframe: Ongoing 2021-2029 as opportunities arise

Objectives: Preserve the 673 Carson Housing Authority-assisted affordable units and encourage the 130 HUD-assisted affordable units to extend their contracts; Ensure no net loss of units.

PROGRAM II: MOBILE HOME PARK MAINTENANCE AND PRESERVATION

The City recognizes the role of mobile home parks as a source of affordable housing for lower-income households. The maintenance and preservation of mobile home units, as well as the preservation of the parks themselves, is necessary to reduce displacement pressures on lower-income households that depend on such housing. Although the City has limited control over the closure of mobile home parks, it can enact programs that encourage the preservation of the parks or ensure financial assistance to residents to reduce any adverse impacts that result from such a closure. This program is divided into three approaches, provided as follows.

- **Mobile Home Maintenance** – The City maintains the Mobilehome Space Rent Control Ordinance to protect the affordability of mobile home units. The Ordinance was amended in 2018 to establish the Consumer Price Index (CPI) Rent Increase, which operates alongside the Capital Improvement Rent Increase and the Fair Return Rent Increase. Mobile home rehabilitations are available in conjunction with the Neighborhood Pride Program as described in Program 1. The City will continue to provide and educate residents about rehabilitation programs, and enforce the rent control ordinance.
- **Mobile Home Park Preservation** – The City encourages preservation of the existing supply of mobile home parks, since the parks constitute a significant portion of the low- and moderate-income housing in the City. The City currently monitors potential conversion activity and seeks financing mechanisms to preserve the parks. The City will continue these efforts and pursue additional funding sources. One potential method of preservation is through HCD's Mobilehome Park Rehabilitation and Resident Ownership Program (MPRRP), which finances the conversion of mobile home park spaces to ownership spaces or control by resident organizations, non-profit housing sponsors, or local public entities. During the update of the Planning and Zoning Code, the City will review existing statutes and consider amendments as necessary to facilitate the preservation of mobile home parks.
- **Mitigation of Mobile Home Park Closures** – If the preservation of a mobile home park is not feasible or possible, the City requires that property owners mitigate the impacts of a park closure. A park closure, or any change in the park's status to a vacant use, is deemed to be a conversion of that park. The City requires a relocation impact report (RIR) in order to approve such a conversion. RIRs are required to mitigate the adverse impacts of a mobile home park's closure, including identifying suitable replacement spaces. Sections 9201.7.2 and 9128.21 of the Carson Municipal Code provide requirements related to the conversion of mobile home parks. Recent State law, including AB 2782, have increased the allowable relocation benefits that park residents may receive. The City will continue to require RIRs for mobile home park closures and push for relocation benefit packages that ensure residents can access comparable alternative housing.

Responsible Agency: Carson Community Development Department; Carson Planning Division; Carson Mobile Home Rent Review Board

Potential Funding Source: General Fund; CDBG; HCD; private funding sources

Timeframe: Ongoing 2021-2029 and as opportunities arise; Zoning Code Update underway

Objectives:

- Mobile Home Maintenance – Approximately 10 units to be assisted through rehabilitation loans annually. Rent increase applications reviewed and Mobilehome Rental Review Board hearings scheduled as applications are received and processed.
- Mobile Home Park Preservation – Monitor and evaluate potential conversion activity and provide conversion financing opportunities.
- Mitigation of Mobile Home Park Closures – Evaluate the conversion application process and mitigate adverse impacts.

PROGRAM 12: RENTAL ASSISTANCE

While there are a number of affordable units in Carson that are subsidized under the Section 8 Housing Choice Voucher program, the program is not directly administered by the City. The Los Angeles County Development Agency (LACDA) allocates Section 8 vouchers to Carson residents. The City will also continue to work with LACDA to monitor existing Section 8 vouchers and pursue additional assistance. Further, the City will continue to provide direct rental subsidies to lower-income households pursuant to affordability covenants. The City will provide information about the Section 8 program to Carson residents, including on its website.

Throughout the COVID-19 public health emergency, the City has received funding for emergency rental assistance. This funding was made available through CARES Act emergency funding and directly assisted 13 families in 2020. The City will continue to allocate funds to assist eligible persons at risk of eviction due to loss of income as available.

Responsible Agency: Carson Community Development Department; Carson Housing Authority; Los Angeles County Development Agency

Potential Funding Source: HUD; Carson Housing Authority Funds; CARES Act emergency funding

Timeframe: Ongoing 2021-2029; Duration of the COVID-19 health emergency, as available

Objectives: Provide assistance to at least 100 households annually; Encourage the retention of at least 272 Section 8 vouchers; Provide CARES Act emergency funds as available.

PROGRAM 13: SPECIAL NEEDS HOUSING

There are several housing options available for residents with special needs in Carson. This includes senior housing, residential care facilities, emergency shelters, and transitional and supportive housing. The City has assisted in the development of a number of senior housing units and allows for the development of all types of special needs housing in at least one zone. Further, the City maintains a reasonable accommodation procedure in Section 9172.27 of the Planning and Zoning Code. The City will prioritize the development of special needs housing, provide development assistance where feasible, and remove any constraints. Specific actions the City will take for special needs groups include the following.

- **Housing for Persons with Disabilities** – A residential care facility is one housing option available for persons with disabilities. The City will update the Planning and Zoning Code to remove constraints to development of residential care facilities, including parking standards dependent on

type of care for residential care facilities with six or more people. For residents with disabilities who do not live in a residential care facility, the City will continue to provide reasonable accommodations to residents in need and offer financial assistance if necessary. The City maintains a reasonable accommodation ordinance that expands upon the provisions in the Residential Rehabilitation Program. The City will also continue to educate residents about reasonable accommodation by providing information in public places and on the City's website.

- **Housing for Persons with Developmental Disabilities** – The City will seek State and federal funds in support of housing construction and rehabilitation targeted toward persons with developmental disabilities. Regulatory incentives, such as expedited permit processing and fee waivers/deferrals, will be provided as feasible to projects targeted toward such persons. To further facilitate the development of housing units to accommodate persons with these disabilities, the City will also reach out annually to developers of supportive housing to encourage development of projects targeted toward special needs groups.
- **Emergency Shelters** – The City currently permits emergency shelters by right in the Manufacturing, Light (ML) and Manufacturing, Heavy (MH) zones. Following adoption of the 2040 General Plan, the City will amend the Planning and Zoning Code to continue to permit by right development in identified zones. The City will also continue to monitor the inventory of sites appropriate to accommodate emergency shelters, and work with appropriate organizations to ensure the needs of the homeless population are met.
- **Transitional and Supportive Housing** – The City currently permits transitional and supportive housing in all residential and mixed-use zones, and such housing is subject to the same standards as other residential uses. The City classifies single-room occupancy (SRO) units as a type of transitional housing which are permitted in the RM, MU-CS and MU-SB zones. Following adoption of the 2040 General Plan, the City will amend the Planning and Zoning Code to continue to permit transitional and supportive housing development in identified zones and remove any constraints identified for residential developments, including clarifying language related to SROs and the requirement of a CUP for all multifamily projects as outlined in Program 3. The City will also continue to monitor the inventory of sites appropriate to accommodate transitional and supportive housing, and work with appropriate organizations to ensure the needs of the homeless population are met.
- **Low Barrier Navigation Centers** – The City will update the Planning and Zoning Code to permit the development of Low Barrier Navigation Centers by right in all mixed-use and non-residential zones permitting multifamily uses, consistent with AB 101.

Responsible Agency: Carson Community Development Department; Carson Planning Division; Carson Housing Authority; Carson Building & Safety Division

Potential Funding Source: General Fund; Carson Housing Authority Funds; SB2 and LEAP Grants; California State Council on Developmental Disabilities; HUD; HCD; Los Angeles County Homeless Services Authority; private/non-profit service agencies

Timeframe: Amend the Planning and Zoning Code within one year of adoption of the 2040 General Plan; Ongoing 2021-2029

Objectives:

- Facilitate the development of housing for persons with disabilities, including developmental disabilities.
- Educate residents about the reasonable accommodation ordinance and Residential Rehabilitation Program.
- Facilitate the development of housing for persons experiencing homelessness.

PROGRAM 14: AFFIRMATIVELY FURTHERING FAIR HOUSING

Pursuant to AB 686, all jurisdictions are mandated to affirmatively further fair housing. To facilitate this mandate, the 2020 Analysis of Impediments and Chapter 3 of this element have identified fair housing issues and actions the City can take to remove or reduce the associated contributing factors.

Fair housing enforcement and outreach is a key component of this mandate. To provide fair housing services, Carson contracts with the Housing Rights Center of Los Angeles, which provides Discrimination Investigation, Tenant/Landlord Mediation, and Legal Services Assistance. The City will continue this contract and extend fair housing services through increased outreach and education, including through efforts like workshops, Spanish language educational materials, and partnerships with community agencies to provide financial literacy classes for homebuyers. The City will also work with the Housing Rights Center to address discriminatory patterns in lending.

Program 1 of this Housing Action Plan will address disproportionate housing needs through the rehabilitation of homeowner and rental housing. Programs 4 and 14 will ameliorate constraints to fair housing choice, such as development standards that impede the development of accessible housing units, through a comprehensive update of the Planning and Zoning Code. The City will also allow multifamily housing in previously restricted areas, while mitigating environmental hazards. The 2040 General Plan will encourage residential development in previously restricted areas through the FLX designation and provide increased maximum densities in a number of land use designations.

Responsible Agency: Housing Rights Center of Los Angeles; Carson Community Development Department; Carson Planning Division

Potential Funding Source: General Fund; CDBG; SB2 and LEAP Grants

Timeframe: Amend the Planning and Zoning Code within one year of adoption of the 2040 General Plan; Ongoing 2021-2029

Objectives: Affirmatively further fair housing by removing or reducing constraints on the development of housing appropriate for protected groups, promoting fair housing choice, and providing fair housing services.

PROGRAM 15: ENERGY CONSERVATION

The City will continue to encourage the use of, and support and assist in the publicizing of, energy-saving programs provided by utility companies. The City currently participates in the Clean Power Alliance which provides clean energy and offers a number of financial assistance plans for lower-income households. The City Center Senior project was developed as a green housing project and the City was awarded the SolSmart Gold certification. The City, in partnership with the Maravilla Foundation, is also working with the

Southern California Gas Company to offer no-cost energy efficiency programs to income-eligible renters and homeowners.

The City will continue participation in the Clean Power Alliance and encourage residents to select energy-saving plans. The City will also continue to encourage lower-income households to take advantage of no-cost energy efficiency programs provided by the Southern California Gas Company. Further, the City will continue to encourage energy and water efficiency in new development by connecting developers with the appropriate resources, including HUD's new Energy and Water Efficiency Resource Library.

Responsible Agency: Carson Planning Division and Carson Community Development Department

Potential Funding Source: Southern California Edison; Clean Power Alliance; Southern California Gas Company; Los Angeles County; HUD

Timeframe: Ongoing 2021-2029

Objectives: Facilitate energy conservation in housing development.

6.3 Quantified Objectives

State Housing Law requires that quantified objectives be established for new construction, rehabilitation, conservation, and preservation activities that will occur during the Housing Element cycle. Table 6-1 summarizes the City's quantified objectives by income category for the 2021-2029 planning period. New construction estimates include units in approved and under review projects, projected accessory dwelling units (ADUs), and the minimum remaining RHNA capacity.

Table 6-1: City of Carson 2021-2029 Quantified Objectives

Income Category	Approved	New Construction ¹			Rehabilitation ²	Conservation/ Preservation ³
		Under Review	Projected ADUs	Remaining RHNA		
Very Low-Income ⁴	0	0	48	1,722	X	198
Low-Income	0	0	120	793	100	298
Moderate-Income	0	1,138	17	0	100	307
Above Moderate-Income	292	1,727	95	0	0	304
Total	292	2,865	280	2,515	200	1,107

Table 6-1: City of Carson 2021-2029 Quantified Objectives

Income Category	Approved	New Construction ¹			Rehabilitation ²	Conservation/ Preservation ³
		Under Review	Projected ADUs	Remaining RHNA		
1. New construction objectives represent the City's RHNA for the Sixth Cycle Housing Element Update. Estimates include units from approved and under review projects, as well as projected accessory dwelling units (ADUs).						
2. The Carson Housing Authority may utilize available funding – HOME, CDBG, etc. allocations – to provide funding during the planning period to fund projects that improve and maintain the quality of the City's housing stock and residential infrastructure. Estimates are based on the number of units that will likely be rehabbed under the Neighborhood Pride Program.						
3. Conservation estimates are based on the number of estimated assisted units provided by the Carson Housing Authority and HUD Multifamily Assistance & Section 8 database. Unrestricted units are considered above moderate-income, and HUD-funded units are split evenly between the low- and moderate-income categories. The California Housing Partnership also provides data on assisted housing units and assesses the level of risk to converting to market rate. These data identify homes without a known overlapping subsidy that would extend affordability beyond the indicated timeframe and unless otherwise noted are not owned by a large/stable non-profit, mission-driven developer. Carson's assisted units are at moderate to very high risk of conversion, and the City has 130 potentially at-risk units. At-risk units are discussed further in Chapter 2.						
4. Extremely low-income housing need is assumed to be 50 percent of very low-income housing need, or 885 units.						

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APPENDIX A – Reserved for Public Outreach Materials

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APPENDIX B – State Licensed Residential Care Facilities

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Table B-1: City of Carson Licensed Residential Care Facilities

Facility Type	Facility #	Capacity	License Status	Facility Name	Street Address	City	State	Zipcode	Telephone #
Adult Residential	198601621	4	Licensed	246 Van Zant Home	455 E. 246th Place	Carson	CA	90745	(310) 518-3372
Adult Residential	191600217	6	Licensed	Acosta Family Home	1540 Cyrene Drive	Carson	CA	90746	(310) 604-8740
Adult Residential	191601301	6	Licensed	Acosta Family Home li	1811 Abila Street	Carson	CA	90745	(310) 513-9966
Adult Residential	198320075	4	Licensed	Adams House, Inc., The	806 E.Claude Street	Carson	CA	90746	(310) 756-6654
Adult Residential	198320109	4	Licensed	Amber Adult Residential Home	19315 Weiser Avenue	Carson	CA	90746	(415) 374-0060
Adult Residential	198602963	4	Licensed	Ben T's Family Care	17700 Exa Ct	Carson	CA	90746	(323) 779-1842
Adult Residential	198601391	6	Licensed	Blessary's Home Inc.	19515 Dunbrooke Ave.	Carson	CA	90746	(310) 516-8054
Adult Residential	198602627	3	Licensed	California Mentor - 230th Street Home	434 W 230th Street	Carson	CA	90745	(909) 483-2505
Adult Residential	198602255	3	Licensed	California Mentor - Dominguez Home	214 E Dominguez	Carson	CA	90745	(909) 483-2505
Adult Residential	198603108	4	Licensed	Carriage Crest Homecare	553 E 222nd St	Carson	CA	90745	(310) 989-8017
Adult Residential	198320160	4	Pending	Carriage Crest Homecare Inc.	23124 Caroldale Avenue	Carson	CA	90745	(424) 477-5112
Adult Residential	198201550	6	Licensed	Emily's Home	359 E. 169th Street	Carson	CA	90746	(310) 329-6555
Adult Residential	198201803	6	Licensed	Emily's Home Iv	19011 Eddington Drive	Carson	CA	90746	(310) 378-3669
Adult Residential	198202981	6	Licensed	Emily's Home V	19203 Campaign Drive	Carson	CA	90746	(310) 378-3669

Table B-1: City of Carson Licensed Residential Care Facilities

Facility Type	Facility #	Capacity	License Status	Facility Name	Street Address	City	State	Zipcode	Telephone #
Adult Residential	198320134	4	Pending	Empower Living Adult Residential Facility, Inc	828 E Radbard St	Carson	CA	90746	(310) 819-8586
Adult Residential	198602267	4	Licensed	Enslow Manor	20015 Enslow Drive	Carson	CA	90746	(310) 933-8710
Adult Residential	198601622	4	Licensed	Fariman Van Zant Home	19209 Fariman Drive	Carson	CA	90746	(310) 763-9269
Adult Residential	198320140	4	Pending	Florian House Adult Residential Facility	17602 Crabapple Way	Carson	CA	90746	(661) 313-9388
Adult Residential	191671053	6	Licensed	Garnio Group Home	21528 Ronan Ave.	Carson	CA	90745	(310) 834-3918
Adult Residential	197800725	6	Licensed	Grace Care Corporation	317 E. 189th St.	Carson	CA	90746	(310) 527-2018
Adult Residential	198201837	6	Licensed	Grace Care Corporation	116 E. 189th Street	Carson	CA	90746	(310) 527-0170
Adult Residential	198320121	4	Licensed	Harlan House	19207 Harlan Avenue	Carson	CA	90746	(424) 224-1525
Adult Residential	198201097	6	Licensed	Harrison's Board & Care Homes, Inc.	20108 Belshaw Avenue	Carson	CA	90746	(310) 554-4210
Adult Residential	191601075	6	Licensed	Harrison's Family Home Adult Residential	1617 Helmick	Carson	CA	90746	(310) 608-4591
Adult Residential	198602222	4	Licensed	Heartwell Home 1	22908 Anchor Ave	Carson	CA	90745	(310) 989-8017
Adult Residential	198602223	4	Licensed	Heartwell Home 2	203 E 219th St	Carson	CA	90745	(310) 989-8017
Adult Residential	198601343	4	Licensed	Heritage House	16317 Mckinley Ave	Carson	CA	90746	(310) 486-9030
Adult Residential	198602579	4	Licensed	Home On 213 St	1356 E 213th Street	Carson	CA	90745	(310) 935-2811

Table B-1: City of Carson Licensed Residential Care Facilities

Facility Type	Facility #	Capacity	License Status	Facility Name	Street Address	City	State	Zipcode	Telephone #
Adult Residential	198320097	4	Licensed	Ivy Homes	17413 Merimac Court	Carson	CA	90746	(310) 753-3777
Adult Residential	198320040	4	Licensed	Khemas Residential Home I	555 E. Bradenhall Drive	Carson	CA	90746	(310) 365-9956
Adult Residential	198600586	6	Licensed	Kindweiler Home	272 East 213th St.	Carson	CA	90745	(310) 999-8666
Adult Residential	198320092	6	Licensed	Lifestyle Board And Care	149 East 235th Street	Carson	CA	90745	(562) 743-1037
Adult Residential	198602101	6	Licensed	Lifestyle Board And Care	149 East 235th Street	Carson	CA	90745	(310) 834-9325
Adult Residential	198600504	6	Licensed	Lori's Adult Residential	20024 Northwood Avenue	Carson	CA	90746	(310) 637-7902
Adult Residential	198603039	4	Licensed	Lourdes Home I	22032 Moneta Ave	Carson	CA	90745	(424) 264-5437
Adult Residential	198603041	4	Licensed	Lourdes Home 2	22133 Hansom Ave	Carson	CA	90745	(310) 513-1806
Adult Residential	198201096	6	Licensed	Meding's Home Care	627 W. 232nd Street	Carson	CA	90745	(310) 835-8432
Adult Residential	198202562	6	Licensed	Meding's Home Care II	123 West 220th Street	Carson	CA	90745	(310) 830-3286
Adult Residential	198600006	4	Licensed	Millmont Home	1118 E. Millmont Street	Carson	CA	90746	(310) 631-1952
Adult Residential	198602877	4	Licensed	Murdock Arf	20029 Alvo Ave	Carson	CA	90746	(310) 567-6134
Adult Residential	191601550	6	Licensed	Nalas Residential Facility	19103 Enslow Drive	Carson	CA	90746	(310) 538-0228
Adult Residential	198600454	6	Licensed	Olive's Home	20020 Broadacres Avenue	Carson	CA	90746	(310) 604-6010
Adult Residential	198601766	110	Licensed	Olivia Isabel Manor	21515 S. Figueroa Street	Carson	CA	90745	(310) 328-5116
Adult Residential	198601777	4	Licensed	Park Lane Home II	22729 Neptune Avenue	Carson	CA	90745	(562) 595-9021

Table B-1: City of Carson Licensed Residential Care Facilities

<i>Facility Type</i>	<i>Facility #</i>	<i>Capacity</i>	<i>License Status</i>	<i>Facility Name</i>	<i>Street Address</i>	<i>City</i>	<i>State</i>	<i>Zipcode</i>	<i>Telephone #</i>
Adult Residential	198201170	4	Licensed	Perez Fam Home	156 W. 234th Street	Carson	CA	90745	(310) 834-5199
Adult Residential	198201618	6	Licensed	Perez Family Home li	332 Neilson Street	Carson	CA	90745	(310) 469-9489
Adult Residential	198602414	4	Licensed	Priscilla's Home 2	1606 W 220th Street	Carson	CA	90745	(424) 536-3116
Adult Residential	198201947	6	Licensed	Renteria Home	238 West 231st Street	Carson	CA	90745	(310) 835-3082
Adult Residential	198320139	4	Pending	Rose Garden Residential Llc	19916 Scobey Ave.	Carson	CA	90746	(310) 357-0132
Adult Residential	198602996	4	Licensed	Sar Adult Home Care	926 E 163rd St	Carson	CA	90746	(562) 301-6726
Adult Residential	191600793	4	Licensed	Simpson Family Home	18430 Coltman Ave	Carson	CA	90746	(310) 324-8973
Adult Residential	198320033	3	Licensed	Smile Adult Residential Facility	938 East Turmont Street	Carson	CA	90746	(562) 353-0927
Adult Residential	198601717	4	Licensed	South Bay Family Home	21821 Archibald Ave.	Carson	CA	90745	(310) 320-3630
Adult Residential	198320090	4	Licensed	South Bay Family Home, Llc	21821 Archibald Ave.	Carson	CA	90745	(310) 919-8272
Adult Residential	191670135	6	Licensed	Taylor's Residential Care	1037 East Gladwick	Carson	CA	90746	(310) 638-8887
Adult Residential	198602920	4	Licensed	Threenity Homes	17205 Crocker Ave	Carson	CA	90746	(310) 753-3777
Adult Residential	198603090	6	Licensed	Top Of The Hill Adult Care Facility	806 E Sandpoint Ct	Carson	CA	90746	(310) 720-5458
Adult Residential	198602573	4	Licensed	Trinity Homes	17505 Harwick Ct	Carson	CA	90746	(310) 753-3777
Adult Residential	198602385	4	Licensed	Trinity Homes li	20331 Caron Circle	Carson	CA	90746	(310) 933-8447

Table B-1: City of Carson Licensed Residential Care Facilities

Facility Type	Facility #	Capacity	License Status	Facility Name	Street Address	City	State	Zipcode	Telephone #
Adult Residential	191601557	6	Licensed	Withers Adult Residential Care Home	17419 Lysander Drive	Carson	CA	90746	(310) 635-5957
Adult Residential	198202826	6	Licensed	Withers Adult Residential Facility #1	841 East Meadbrook Street	Carson	CA	90746	(310) 323-6895
Residential Care Elderly	197607670	5	Licensed	A Paradise Elderly Home	178 West 231st Street	Carson	CA	90745	(310) 876-6917
Residential Care Elderly	198601725	6	Licensed	A Sunnyday Guest Home	411 W. 226th Street	Carson	CA	90745	(424) 731-7451
Residential Care Elderly	197608233	6	Licensed	Amazing Paradise Home Care	312 West 229th Street	Carson	CA	90745	(310) 549-9888
Residential Care Elderly	198601641	10	Licensed	Bayside Guest Home, The	138 W. 223rd St.	Carson	CA	90745	(424) 536-3141
Residential Care Elderly	198320008	6	Licensed	Blessed Blissful Home Care	23025 Nicolle Ave	Carson	CA	90745	(424) 536-3330
Residential Care Elderly	197800100	6	Licensed	Carson Guest Home	22418 Catskill Avenue	Carson	CA	90745	(310) 830-2518
Residential Care Elderly	198204950	230	Licensed	Carson Senior Assisted Living	345 East Carson Street	Carson	CA	90745	(310) 830-4010
Residential Care Elderly	197606934	6	Licensed	Celebrity Care Home	233 W. 234th Street	Carson	CA	90745	(310) 830-8366
Residential Care Elderly	198320046	6	Licensed	Drock Home Care	1652 E Cyrene Drive	Carson	CA	90746	(310) 997-8046
Residential Care Elderly	198320041	6	Licensed	Good Hands Homecare	105 W. 225th Street	Carson	CA	90745	(310) 422-0950
Residential Care Elderly	198601704	6	Licensed	Harmony Home Care	1318 215th Street	Carson	CA	90745	(310) 549-0218
Residential Care Elderly	198602933	4	Licensed	Karteena's Rcfce	20019 Midtown Ave	Carson	CA	90746	(310) 919-9598
Residential Care Elderly	198320201	4	Pending	Lamar's Haven Llc	1618 E. Turmont Street	Carson	CA	90746	(562) 229-8047

Table B-1: City of Carson Licensed Residential Care Facilities

<i>Facility Type</i>	<i>Facility #</i>	<i>Capacity</i>	<i>License Status</i>	<i>Facility Name</i>	<i>Street Address</i>	<i>City</i>	<i>State</i>	<i>Zipcode</i>	<i>Telephone #</i>
Residential Care Elderly	198602177	6	Licensed	Live Well Residential Care	211 E Clarion Drive	Carson	CA	90745	(310) 435-8608
Residential Care Elderly	198603042	4	Licensed	Lourdes Home 3	110 E 229th Pl	Carson	CA	90745	(310) 549-1208
Residential Care Elderly	198205247	6	Licensed	South Bay Residential Home	430 West 214th Street	Carson	CA	90745	(424) 271-7310
Residential Care Elderly	197606350	6	Licensed	St. Anthony's Care Home	507 West 215th Street	Carson	CA	90745	(424) 271-7071
Residential Care Elderly	198204584	6	Licensed	Villa Angela Residential Home	23528 Figueroa Street	Carson	CA	90745	(310) 835-6773
Residential Care Elderly	198320009	6	Licensed	Wellness World Llc	1119 E 215th Pl	Carson	CA	90745	(213) 568-7298
Small Family Home	198201396	1	Licensed	Ugalde Small Family Home	1458 East 215th Street	Carson	CA	90745 0	(310) 597-1857

Source: California Department of Social Services, Community Care Licensing Division

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APPENDIX C – Sites Inventory

This appendix details the availability of potential sites in the City of Carson to meet the Regional Housing Needs Allocation (RHNA) during the 2021-2029 projection period. It provides a detailed explanation of the identification of credits towards the RHNA, the selection of vacant and underutilized non-vacant sites, and the determination of realistic capacity for those sites. The 2021-2029 City of Carson Housing Sites Inventory (Inventory) is included at the end of this appendix. Figure C-1 provides a map of sites identified in the Inventory.

The RHNA is determined to assess the “fair share” of a local jurisdiction’s existing and future housing needs. The Department of Housing and Community Development (HCD), in collaboration with the regional Council of Government (COG), is responsible for quantifying the fair share of a local jurisdiction based on regional growth projections by income category. The COG for the City of Carson is the Southern California Council of Governments (SCAG). The eight-year planning period for all jurisdictions within the SCAG region is from October 2021 to October 2029. In accordance with Government Code Section 65584, the final RHNA plan was adopted by SCAG’s governing board on March 4, 2021 and updated on July 1, 2021. The RHNA plan distributes regional housing need across jurisdictions by the following income categories:

- Very low-income - less than 50 percent of the county median income.
- Low-income - between 51 and 80 percent of the county median income.
- Moderate-income - between 81 and 120 percent of the county median income.
- Above moderate-income - greater than 120 percent of the county median income.

SCAG’s adopted 2021 final RHNA figures identify an overall construction need of 5,618 new units in Carson, a significant increase from the prior cycle’s allocation of 1,698 new units. Table C-1 shows the income breakdown of these units. As provided by State law, the housing needs of extremely low-income households, or those making less than 30 percent of area median income (AMI), is estimated as 50 percent of the very low-income housing need, or about 885 units during the planning period.

Table C-1: City of Carson Regional Housing Needs Assessment 2021-2029

<i>Income Level¹</i>	<i>Needed Units</i>	<i>Percent of Needed Units</i>
<i>Extremely Low-Income (<30% AMI)²</i>	885	-
Very Low-Income (0-50% AMI)	1,770	31.5%
Low-Income (51-80% AMI)	913	16.3%
Moderate-Income (81-120% AMI)	875	15.6%
Above Moderate-Income (120% AMI)	2,060	36.7%
Total	5,618	100%

Table C-1: City of Carson Regional Housing Needs Assessment 2021-2029

<i>Income Level¹</i>	<i>Needed Units</i>	<i>Percent of Needed Units</i>
1. Income levels were determined by county median household income. Based on 2013-2017 ACS data, SCAG used a median income of \$61,015 in Los Angeles County to determine allocations.		
2. Development needs of extremely-low-income units are assumed to be 50 percent of very-low-income housing needs.		
<i>Source: SCAG Regional Housing Needs Assessment, 2021</i>		

Credits Toward RHNA

According to HCD Guidance, projects that have been approved, permitted, or receive a Certificate of Occupancy during the projection period (June 30, 2021 to October 15, 2029) can be counted toward the 2021-2029 cycle RHNA. Where there are “pipeline projects” located on sites in the Inventory, actual proposed densities are reflected. Further, projects currently under review by the City may also be credited towards RHNA. The State also allows anticipated accessory dwelling units (ADUs) to be credited. The City is currently updating its Planning and Zoning Code, including ADU incentives, and expects continued ADU development.

Table C-2 summarizes the quantity of units in Carson that may be credited towards RHNA. This includes pipeline projects, including those approved, under construction and under review, as well as projected ADUs. The City has adequate capacity to accommodate 3,437 units which can be credited towards RHNA. Although housing needs for moderate- and above moderate-income households are exceeded, the City must accommodate the shortfall of 2,515 lower-income units with vacant and underutilized non-vacant sites. The following section discusses specific projects that may be credited towards RHNA.

Table C-2: Progress Toward the 2021-2029 RHNA

<i>Income Category¹</i>	<i>Under Construction</i>	<i>Approved</i>	<i>Under Review</i>	<i>Projected ADUs²</i>	<i>Total Credits</i>	<i>Number of Units</i>	<i>Remaining Need</i>
Very Low Income (0-50% AMI)	0	0	0	48	48	1,770	1,722
Low Income (51-80% AMI)	0	0	0	120	120	913	793
Moderate Income (81-120% AMI)	0	0	1,138	17	1,155	875	-280
Above Moderate Income (>120% AMI)	0	292	1,727	95	2,114	2,060	-54
Total	0	292	2,865	280	3,437	5,618	2,181

1. Income levels were determined by county median household income. Based on 2013-2017 ACS data, SCAG used a median income of \$61,015 in Los Angeles County to determine allocations.

2. ADU – accessory dwelling unit.

Source: SCAG Regional Housing Needs Assessment, 2020; City of Carson, 2021

PIPELINE PROJECTS

Pipeline projects in the Inventory include those that have been recently approved by the City, those that are currently under construction, and those that are under review. The pipeline projects included in the Inventory are likely to finish construction during the planning period. There are 10 such projects in the Inventory, as outlined in Table C-3. There are no pipeline units suitable for lower-income households, and no projects currently under construction. In total, 292 above moderate-income units have been approved by the City. Further, 1,423 moderate-income units and 1,442 above moderate-income units are under review by the City. The affordability of these units was determined based on the affordability levels or projected rents specified on the project proposal as approved or under review by the City. For projects under review, unless otherwise indicated, it was assumed that 60 percent of units would be above moderate-income while 40 percent would be moderate-income.

It should be noted that residential development in The District at South Bay project will only occur in a portion of the nearly 63.5-acre parcel (APN 7336010903). In Figure C-1, only the portion of the parcel that will contain residential development is displayed. This section is about 15.6 acres.

Table C-3: Pipeline Projects

Project	Units			Type
	Low and Very Low Income	Moderate Income	Above Moderate Income	
Approved				
Carson Landing Townhomes	0	0	175	Condos
Brandywine	0	0	36	Townhomes
Cambria Court	0	0	35	Condos
223rd Street Condos	0	0	9	Condos
Dolores Condos	0	0	5	Condos
Birch Condos	0	0	32	Condos
Under Review				
Imperial Avalon Specific Plan	0	496	744	Mixed Use
Carson Lofts	0	0	19	Multifamily
Torrance/Main Specific Plan	0	142	214	Urban Residential or Mixed Use
The District at South Bay (2021) ¹	0	500	750	Mixed Use
Total	0	1,138	2,019	

1. The project was originally adopted in 2006 and amended in 2011 and 2018. It will have an estimated total of 1,550 residential units, with an estimated 1,250 units available during the planning period.

Source: City of Carson, 2021

PROJECTED ADUS

The City is currently updating its Planning and Zoning Code, which will be amended following adoption of the 2040 General Plan. Part of this update includes revising existing ADU requirements, also referred to as “second dwelling units” in the Carson Municipal Code, to correspond to recent State law. Between 2017 and June 2021, the City approved a total of 173 ADUs, or about 35 ADUs annually. Based on these recent development trends, the City anticipates that an additional 280 ADUs will be approved during the 2021-2029 eight-year planning period.

To estimate the number of projected ADUs by income level, SCAG has provided the Regional Accessory Dwelling Unit Affordability Analysis (Analysis). The Analysis determined affordability assumptions based on a survey of existing ADUs and market rents across the jurisdictions in the SCAG region. Carson is included in the LA County I region as a South Bay city. Table C-4 uses the affordability assumptions derived by SCAG and provides anticipated ADU development based on the total 280 projected ADUs.

Table C-4: Projected ADUs

<i>Income Category</i>	<i>LA County I Modifiers¹</i>	<i>Projected ADUs</i>
Extremely Low-Income	15.0%	42
Very Low-Income	2.0%	6
Low-Income	43.0%	120
Moderate-Income	6.0%	17
Above Moderate-Income	34.0%	95
Total	100.0%	280
1. LA County I includes South Bay Cities.		

Source: Southern California Association of Governments, Regional Accessory Dwelling Unit Affordability Analysis, 2020

Availability of Land to Address the Remaining RHNA

Carson is almost entirely developed, with very few vacant or “greenfield” sites available for housing. Further, as noted in Chapter 4 of this element, the long history of industrial or other polluting uses in the city may serve as a constraint to development as remediation can be costly. However, in recent years Carson has seen a massive increase in housing development that has successfully mitigated such constraints and promoted infill development on largely non-vacant and underutilized land. For instance, according to each respective city’s 2020 Annual Progress Report, Carson has issued permits for a total of 1,313 units (77.3 percent of 5th cycle RHNA) between 2014-2020 compared to the neighboring City of Long Beach with 7,048 units (57.2 percent of RHNA). There have been a number of successful projects, including mixed-use projects, along the Carson Street corridor and other key areas of the city. Further, there are several completed or soon to be completed affordable housing developments, all of which have been developed on previously non-vacant land.

SITE SELECTION METHODOLOGY

To identify adequate sites and determine realistic capacity for the 2021-2029 Inventory, a parcel-based analysis of properties within city limits was conducted using Los Angeles County Assessor data supplemented with information from the City. This analysis was carried out in accordance with the framework provided by the 2020 HCD Housing Element Site Inventory Guidebook.

First, the locations of current development projects were identified, including permitted projects that are approved or under construction and those under review (pipeline) as discussed above. Sites located on vacant and non-vacant land used to meet the RHNA shortfall were selected based on land use designations. This Housing Element cycle coincides with the 2040 General Plan Update and subsequent update to the City Planning and Zoning Code, which must comply with the General Plan per State law. Therefore, updated General Plan land use designations were used to identify sites on land with permitted residential uses. This includes the following designations: Low Density Residential (LDR), Medium Density Residential (MDR), High Density Residential (HDR), Corridor Mixed Use (CMU), Downtown Mixed Use (DMU), and Flex District (FLX). While Business Residential Mixed Use (BMRU) permits residential uses, no suitable sites were identified within this designation.

Non-residential pipeline projects, completed projects, and those under construction but nearing completion prior to the 2021-2029 planning period are excluded from consideration, as these sites are unlikely to develop with additional housing. Sites that are very small and not viable for lot consolidation (i.e., less than 0.1 acres with no common ownership across adjacent parcels) are also excluded. The remaining vacant and non-vacant opportunity sites are included in the inventory. Non-vacant opportunity sites include those with an existing use that is likely to discontinue during the planning period, those with expressed developer interest, and those generally underutilized or developed with low intensity, such as underperforming strip commercial uses, warehouses, sites with mixed-use potential, and sites adjacent to pipeline projects.

Sites are considered underutilized based on their assessed value (AV) ratio and Floor Area Ratio (FAR). The AV ratio considers the relationship between the value of the land and the improvements constructed on it. Where the value of the land is worth substantially more than the value of the structures on it, there is an incentive for the owner to redevelop with new uses that command higher rents or sales prices. Similarly, a low FAR means that the total building area is small compared to the overall size of the site, indicating the potential for redevelopment at higher intensities. Sites are considered underutilized if the AV ratio is less than 1.0, and most underutilized sites have a FAR of 0.3 or less. Parcels with existing FARs greater than 0.3 are considered with exceptional circumstances, including those with mixed-use potential where high densities are allowed, recent high-density development has occurred and the compatibility of existing use with residential uses given the proposed land use designation. The existing uses and location of sites in relationship to current development patterns are also considered prior to inclusion within the Inventory.

REALISTIC CAPACITY METHODOLOGY

Following site selection, realistic capacity was determined by identifying expected densities for each proposed land use designation. Expected density was initially based on 80 percent of the maximum allowed density in each designation. Density is defined as dwelling units per acre (du/ac). This

density was compared and validated against a review of the densities of recent projects (Table C-5) and nearby developments (Table C-6).

Table C-5: Carson Residential Project Density References

New GP ^I	Project Name	Location	Density (du/ac)	Acres	Units	Status	Type
DMU	Union South Bay	21521-21601 S Avalon Blvd	65	5.5	357	Completed (2020)	Market rate
	Veteran's Village	SW Carson St/Figueroa St	44	1.15	51	Completed	Affordable Housing
	Veo Homes	620 E Carson St	19	8	152	Completed (2016)	Moderate/Above Moderate
CMU	Bella Vita (Sepulveda & Panama)	402 E Sepulveda Blvd	63	1.04	65	Completed (2018)	Affordable/Senior Housing
	Birch Specific Plan	21809-21811 S Figueroa St	41	0.78	32	Approved	Condos
HDR	Evolve South Bay/MBK Homes	20330 S Main St	26	11.5	300	Under Construction	Multifamily
	Carson Landing/Brandywine	NE Central Ave/Victoria St	22	8.07	175	Approved	Townhome/Multifamily
	223rd St Condos	123 E 223rd St	20	0.45	9	Approved	Condos
MDR	Carson Upton/Brandywine	1007 E Victoria St	23	1.57	36	Approved	Townhomes
	Dolores Condos	21915 S Dolores St	13	0.39	5	Approved	Condos
	Cambria Court	427 E 220th St	11	3.11	35	Approved	Condos
LDR	Vera Lane	21801 Vera St	9	1.53	18	Completed (2019)	Condos

I. 2040 General Plan land use designation for Carson projects.

Source: Dyett & Bhatia, 2021

Table C-6: Neighboring Residential Project Density References

Type ^I	Project Name	Location	Density (du/ac)	Acres	Units	Status	Notes
Mixed Use	Vistas Del Puerto	Long Beach, CA	74	0.65	48	Completed 2020	Specific Plan; Affordable

Table C-6: Neighboring Residential Project Density References

Type ^I	Project Name	Location	Density			Status	Notes
			(du/ac)	Acres	Units		
Mixed Use	The Spark	Long Beach, CA	95	1	95	Completed 2021	Specific Plan; Affordable/Supportive
Mixed Use	The Beacon	Long Beach, CA	80	2	160	Completed 2019	Planned Development; Affordable/Supportive
Residential	178th St Townhomes (Melia)	Gardena, CA	23	5	114	Completed 2021	Townhomes (>\$600K)
Mixed Use	Rosecrans Place	Gardena, CA	21	5.46	113	Under Construction	Live-work, Townhomes, Detached (>\$600K); Industrial redevelopment
Residential	Gardena Place	Gardena, CA	20	2	40	Completed 2019	Live-work, Townhomes (>\$500K); Industrial redevelopment
Residential	Gardena TOD/SP	Gardena, CA	200	1.33	265	Planned	Specific Plan; MF & 10% corporate housing
Residential	Evergreen Townhomes Project	Gardena, CA	20	4.15	84	Approved	Commercial rezone to HDR
I. Development type for nearby projects.							

Source: Dyett & Bhatia, 2021

Following this review, the realistic density for each designation was determined. The realistic density of the MDR designation was increased to reflect existing conditions more accurately, given that townhome projects reached densities above 20 du/ac. Both CMU and DMU designations allow increased maximum densities over the base maximum if ground floor commercial use is included. Since the vast majority of units recently developed in these designations are mixed-use, this increased maximum density was assumed across all sites. No current residential development exists in the FLX designation since residential uses were not previously permitted in these areas, however other designations that allow mixed uses have developed at densities close to or above the maximum permitted. The 80 percent modifier was maintained to estimate realistic density. The HDR designation has two separate maximum permitted densities, 40 du/ac for sites over two acres and 30 du/ac for sites under two acres. The current zone that carries out the equivalent land use designation currently only permits a maximum of 25 du/ac. Based on the survey and expected development patterns, the realistic density was assumed to be 32 du/ac for larger sites and 25 du/ac for smaller sites. While the BRMU designation permits residential uses, no suitable sites were identified. See Table C-7 for final realistic density assumptions.

Table C-7: Realistic Capacity Assumptions

<i>Designated Land Use</i>	<i>General Plan Permitted Density (du/ac)</i>		<i>Expected Density (du/ac)²</i>	<i>Realistic Density (du/ac)³</i>
	<i>Minimum</i>	<i>Maximum¹</i>		
CMU ⁴	-	30-45	36	36
DMU ⁵	-	40-55	44	44
FLX	-	40	32	32
HDR ⁶	18	30-40	24-32	25-32
MDR	10	18	12	16
LDR	-	10	8	8

1. Does not include density bonus provisions, incentives, or community benefits.

2. Based on 80% of maximum permitted density.

3. Based on expected density verified against a survey of recent developments.

4. 45 du/ac is permitted with ground level active commercial use. An additional 30 percent is permitted with community benefits.

5. 55 du/ac is permitted with ground level active commercial use. 64 du/ac is permitted with community benefits.

6. 40 du/ac is permitted if the site is larger than two acres. 56 du/ac is permitted with community benefits. Realistic capacity depends on total site acreage.

Source: City of Carson, 2021; Dyett & Bhatia, 2021

Additional modifiers were used when determining the realistic capacity for each site. In the CMU and DMU designations, it is likely that not all sites will develop as mixed-use. Thus, capacity was reduced to 85 percent to reflect the likelihood that a site would develop with mixed uses. Since the City is encouraging the use of such bonuses in mixed-use areas, this is a realistic and slightly conservative estimate of capacity. All non-vacant sites with high potential for redevelopment (i.e., low existing AV ratio and FAR) were additionally constrained to 70 percent, and those with lower potential (i.e., low to moderate AV ratio and FAR) were constrained to 40 percent. Higher potential sites are designated as tier 1 and lower potential sites are designated as tier 2. These modifiers take into account the costs and difficulty associated with infill development on non-vacant sites.

Environmental constraints were also considered in determining realistic capacity. This includes the Alquist-Priolo fault zone, flood hazard areas mapped by Federal Emergency Management Agency (FEMA), and land within 50 feet of electric towers or wires. Although almost all of Carson is an area of minimal flood risk or area with risk of levee failure because the Dominguez Channel, Los Angeles River, and Compton Creek have been channelized. However, current development patterns and recent projects in this area provide evidence of minimal constraints to development; therefore, this constraint was not applied. All other environmental constraints were removed from the total acreage of the site to determine capacity. No sites located above a former landfill or brownfield sites were included in this Inventory, with the exception of those sites that are part of projects either already in the pipeline or under review and likely to develop; none of these projects include lower-income housing units.

AFFORDABILITY TIERS

From this inventory of available land, sites attributed to the following affordability tiers in accordance with guidance from HCD: low- and very low-income, moderate-income, and above moderate-income. Affordability was assumed based on the maximum permitted densities by land use designation per the General Plan Update.

Lower-income sites (including mixed income sites) identified to accommodate the RHNA are designated DMU, CMU, FLX and HDR per the City's General Plan Update. These designations allow for a maximum residential density between 30 and 55 du/ac, not including additional density bonuses or community benefits. Government Code section 65583.2(c)(3) allows jurisdictions to use higher density as a proxy for lower income affordability. In metropolitan counties, such as Los Angeles County, zoning that allows for residential density of at least 30 du/ac is considered sufficient to accommodate the economies of scale needed to produce affordable housing. All vacant and non-vacant sites identified to accommodate lower-income units are located in designations that permit at least 30 du/ac and have a realistic density above that threshold, except one. The Avalon Corridor Site #1 (APN 7335011023) in the HDR designation is assumed to develop at 25 du/ac given prior development patterns and expected densities on a site less than two acres, as discussed above.

Sites identified to accommodate the moderate-income RHNA (including mixed-income sites) are designated CMU, DMU and FLX per the City's General Plan Update. These designations allow for a maximum residential density of between 30 to 55 du/ac, not including additional density bonuses or community benefits. Pipeline projects that will accommodate moderate-income units are located in the DMU and FLX designations. Sites identified to accommodate the above moderate-income RHNA are designated CMU, DMU, FLX, HDR, MDR and LDR per the City's 2040 General Plan. These designations allow for a maximum residential density of between 10 to 55 du/ac. Pipeline projects that will accommodate above moderate-income units are located in the CMU, DMU, FLX, HDR and MDR designations.

UNDERUTILIZED NON-VACANT OPPORTUNITY SITES

Underutilized non-vacant opportunity sites were selected based on likelihood of redevelopment. This includes sites that have had demonstrated interest in redevelopment, those with uses likely to discontinue, and generally underutilized sites with high potential. These sites, designated as tier 1 sites, are outlined in Table C-8.

Table C-8: Underutilized Non-Vacant Tier I Sites

<i>Designated Land Use</i>	<i>Site Description</i>	<i>Assessor Parcel Numbers</i>	<i>Units</i>		
			<i>Low and Very Low Income</i>	<i>Moderate Income</i>	<i>Above Moderate Income</i>
DMU	South Bay Pavilion Mall	7381024037, 7381024038	294	126	0
DMU	Park Avalon Mobile Estates	7332001034	227	0	0

Table C-8: Underutilized Non-Vacant Tier I Sites

Designated Land Use	Site Description	Assessor Parcel Numbers	Units		
			Low and Very Low Income	Moderate Income	Above Moderate Income
FLX	The Links at Victoria Golf Course	7339017902	99	0	0
DMU	Carson Civic Center	7337005927, 7337006919, 7337007904	204	0	0
DMU	Carson Street Corridor Site ¹	7343011013, 7343011018, 7343011019, (7343011020)	43	0	0
DMU	Avalon Carson Plaza	7335010068	116	0	0
HDR	Avalon Corridor Site #1	7335011023	18	0	0
DMU	Avalon Corridor Site #2	7335011024	20	0	0
DMU	Credit Union Site	7343019091, 7343019092	55	0	0
DMU	Carson Business Park Site	7381025061	130	0	0
DMU	Downtown Mixed-Use Site #1	7381025067	89	0	0
DMU	Downtown Mixed-Use Site #2	7381025088	33	0	0
DMU	Downtown Mixed-Use Site #3	7337002042, 7337002043, 7337003012, 7337003013, 7337003014, 7337008030, 7337008031	175	44	219
DMU	Downtown Mixed-Use Site #4	7334018044	43	0	0

Table C-8: Underutilized Non-Vacant Tier 1 Sites

Designated Land Use	Site Description	Assessor Parcel Numbers	Units		
			Low and Very Low Income	Moderate Income	Above Moderate Income
DMU	Downtown Mixed-Use Site #5	7334031062	47	0	0
DMU	Downtown Mixed-Use Site #6	7337008026	17	0	0
DMU	Downtown Mixed-Use Site #7	7339018010	19	0	0
DMU	Downtown Mixed-Use Site #8	7337004047	36	0	0
DMU	Carson and Main Corner Site	7334025036, 7334025038, 7334025039	43	0	0
FLX	Flex District Site #1	7336004010	103	0	0
FLX	Flex District Site #2	7406044023	248	0	0
Total			2,059	170	219

I. This site also contains APN 7343011020, which is a vacant parcel. Residential capacity including the vacant parcel is presented here.

Source: City of Carson, 2021

There are four major tier 1 opportunity sites with current non-vacant uses, including the South Bay Pavilion Mall, the former Park Avalon Mobile Estates, the Links at Victoria Golf Course, and parcels in the Carson Civic Center. The remaining tier 1 sites include those with low AV ratios and low FARs, and are located in areas of the City likely to develop with mixed-use or high-density housing. Tier 2 opportunity sites are included to ensure a sufficient buffer of lower-income units. These sites are generally located on underutilized non-vacant land, including commercial developments with potential for mixed uses, parking lots, and other uses that are likely to discontinue considering land use designations per the General Plan Update.

The owners of the South Bay Pavilion Mall—NewMark Merrill Companies—have expressed strong interest during the Housing Element outreach process in introducing residential uses on a portion of the site, given closing of some stores (e.g. Sears), and with some of the associated extensive parking no longer needed. The Mall is currently designated Mixed Use – Residential, which allows a density of up to 35 du/ac. Under the General Plan Update the Mall’s new designation will be DMU, which will allow a higher maximum base density of 40 du/ac and 55 du/acre for active retail

uses (which the mall would qualify for, not including bonus provisions for community benefits). Further, the City anticipates that horizontal mixed use will be allowed. As a DMU designated site, the project will likely develop at 44 du/ac which may be used as a proxy for lower-income development. However, recognizing existing development patterns in Carson, the project is assumed to contain a mixture of both lower- and moderate-income housing. The Mall is located along the Avalon Boulevard corridor, which is central to future development as outlined in the General Plan and will provide high access to opportunity.

The Park Avalon Mobile Home Estates site has been identified by the City as an opportunity site. The property owner has submitted a Relocation Impact Report (RIR) to the City, indicating their desire to close the mobile home park. Per the submitted RIR, the property owner “anticipates developing the property into denser housing and possible mixed-use appropriate to the City’s burgeoning Civic Center area at the intersection of Avalon Boulevard and Carson Street, where the Park remains an underdeveloped parcel.” The current zoning allows a maximum permitted density of 25 du/ac, while under the General Plan Update the site’s land use designation will be DMU, which will allow up to 55 du/ac with active commercial uses. Further, the RIR indicates that there is no intent to sell the mobile home park. The City has not yet approved the RIR, finding that pursuant to AB 2782 the park owner was obligated to submit additional application completeness items. Although the applicant has indicated a desire to develop at a higher density, they have not applied to the City for approval of any subsequent development on the subject property and have not indicated whether the anticipated or contemplated future development would include affordable housing units. The matter is still up for approval by the City as of July 2021. Given that the permitted density for the site is over 30 du/ac, per State law this density may be used as a proxy for lower-income development.

The sites at the Links at Victoria Golf Course and the Carson Civic Center are all publicly owned parcels, either by the City or the County. Redevelopment at the Victoria Golf Course, which is owned by the County, has recently been approved to develop a new sports and academic center as well as more than one-half million square feet of retail and restaurant space and other amenities. There is approximately 5.0 acres of remaining land located in the FLX designation that would be suitable for the development of lower-income residential housing. Although identified as non-vacant, this area is technically vacant land that sits adjacent to the new recreational and commercial development at the Victoria Golf Course. The Carson Civic Center parcels are located along the Carson Street corridor in the DMU district and could support the densities required for lower-income housing. The City-owned parcels support a variety of civic uses, while the County-owned parcel includes the parking lot of the Carson Sheriff Station. Per the General Plan Update, these parcels are located along a key corridor and are suitable for redevelopment with residential uses at higher intensities.

The Carson Street corridor site is comprised of a number of smaller parcels that are adjacent to each other with the same owner. The Carson Street Corridor site (APNs 7343011013, 7343011018, 7343011019 and 7343011020) is located on Carson Street between Main Street and Moneta Avenue in the DMU designation, with high redevelopment potential. It includes a mix of vacant land and low-density residential development. Given the location of the sites along the key Carson Street corridor and underutilization of land, redevelopment with a higher residential density and mixed uses is likely during the planning period. The Downtown Mixed-Use Site #3 (APNs 7337002042, 7337002043, 7337003012, 7337003013, 7337003014, 7337008030, 7337008031) is also comprised of

a number of adjacent parcels that have the same owner. There has been previous interest in a residential project on the site, which is located at the corner of Avalon Boulevard and 213th Street in the DMU designation. That project was likely to develop with mixed-income units, thus it is assumed that a residential development at that site would also likely support mixed-income development. The site is located in the downtown core of the city and has high redevelopment potential. Given the underutilization of the land and previously expressed interest, the site is likely to develop at a higher residential density with mixed uses during the planning period. Further, the Carson and Main Corner site, located in the DMU designation, contains two parcels smaller than 0.5 acres (APNs 7334025036 and 7334025039). This site has been designated an opportunity area, with high potential for mixed-use redevelopment at the key Carson Street and Main Street intersection.

The remaining tier 1 sites contain underutilized uses and are situated in key redevelopment locations per the General Plan Update. This includes the Avalon Carson Plaza site, the Avalon Corridor sites #1 and #2, the Credit Union site, the Carson Business Park site, the Downtown Mixed-Use sites #1 through #8, and Flex District site #1. All of these sites contain existing uses that are likely to discontinue during the planning period due to changing land use designations, or are likely to supplement existing commercial or retail use with residential uses. Flex District site #2 is also likely to redevelop during this period and is discussed further below as the site contains more than 10 acres.

CANDIDATE SITES ANALYSIS

Overview

The 2021-2029 Carson Housing Element Sites Inventory includes 66 unique parcels (including mixed income designations) appropriate for lower-income units, representing about 145.9 total acres of vacant and non-vacant land. The Inventory includes 27 unique parcels appropriate for moderate-income units (including mixed income sites), representing about 128.7 total acres of vacant and non-vacant land. The Inventory includes 48 unique parcels appropriate for above moderate-income units (including mixed income sites), representing about 126.5 total acres of vacant and non-vacant land. In total, there are 111 unique parcels containing 256.6 acres of land included in the Inventory. A number of parcels are considered as a single site, including those in pipeline and under review projects or parcels adjacent to each other that are likely to redevelop together.

Site Size

HCD has established parameters for the size of sites for lower income RHNA in view of feasibility considerations. Parcels that are less than 0.5 acres in size are generally not considered suitable for lower income housing development as smaller parcels may not allow development of a sufficient number of units for proposed affordable housing projects to compete effectively for limited funding resources. Parcels larger than 10.0 acres in size are also not typically considered suitable by HCD as development of very large projects may lead to an over concentration of affordable housing in one location or may render proposed affordable housing projects ineligible for funding. Sites attributed to lower-income RHNA (including mixed incomes) on the Inventory have an average site size of 2.2 acres. The average moderate-income site size is about 4.8 acres, and the average above

moderate-income site size is about 2.6 acres. The size parameters applicable to lower-income RHNA sites do not apply to moderate- or above moderate-income RHNA sites.

There are two lower-income sites that exceed 10.0 acres in size. The first site (APN 7381024038) is about 12.0 acres and is part of the approximately 16.0-acre South Bay Pavilion Mall. As mentioned above, the Mall developer has expressed considerable interest in developing mixed-use housing at this site, which currently only contains general retail and commercial uses. The exclusive commercial character of the Mall is likely to discontinue during the planning period and develop with residential units at densities deemed acceptable for lower-income housing. However, recognizing existing development patterns in Carson, the project is assumed to contain a mixture of both lower- and moderate-income housing.

The second site that exceeds 10.0 acres (APN 7406044023), is approximately 13.1 acres. The site is located within the FLX designation, indicating that it has the capacity to develop at a maximum of 40 du/ac (although 32 du/ac is assumed). A significant portion of the southern portion site is only a “sliver” that will likely not include residential development but could act as a buffer against industrial uses. Excluding this sliver, the site contains about 11.1 acres of developable land. Total capacity for this site is thus based on 11.1 acres rather than 13.1 acres, and the sliver is excluded from this site in Figure C-1. The site is adjacent to the 9.1-acre Monterey Pines development, and is surrounded by a mix of residential, educational, retail commercial, and some industrial uses. The Monterey Pines Specific Plan, originally adopted in 1995, successfully produced a number of affordable single-family detached homes meant for median-income households in an area adjacent to industrial development. The Monterey Pines project had a similar buffer of land against industrial uses. In addition to Monterey Pines, the City has a track record of approving Specific Plans to accommodate affordable and lower-income housing. More recently this includes the 2015 Sepulveda and Panama Specific Plan, which produced the Bella Vita with 65 multi-family affordable residential units for seniors.

There are nine parcels designated for lower-income housing that are less than 0.5 acres in size. Three of these parcels (APNs 7337008026, 7337008030 and 7337008031) are part of the larger Downtown Mixed-Use Site #3, which in total amounts to about 17.2 acres. Four parcels constitute the Carson Street Corridor site. The Carson Street Corridor site contains four parcels (APNs 7343011013, 7343011018, 7343011019 and 7343011020) that in total amount to 1.5 acres. The suitability of these sites is discussed above. The remaining two parcels (APNs 7334025036 and 7334025039) are part of the larger Carson and Main Corner site discussed above, which totals about 1.7 acres.

Inclusion on Prior Inventories

There are no non-vacant sites intended for lower-income RHNA included on the Inventory that were included in a prior planning period. There is one vacant parcel intended for lower-income RHNA included in the Inventory that was included in two or more prior consecutive planning periods. This requirement does not apply to moderate- or above moderate-income RHNA sites.

The vacant parcel included in both the 4th and 5th cycle Housing Elements is one of the parcels included in the Carson Street Corridor Site (APN 7343011020). During the prior two cycles, this parcel was located in the Mixed-Use – Carson Street (MU-CS) zone, which permits a maximum

density of 35 du/ac. Following the adoption of the General Plan, the site will be rezoned to accommodate the higher densities of the DMU designation, of which it will be a part. The DMU designation permits a base maximum density of 40 du/ac and 55 du/ac with active commercial use, not including other density bonuses or community benefits. As the site will be rezoned to allow for higher densities deemed suitable for lower-income housing, it may be carried forward.

Reliance on Non-Vacant Sites

State law requires that if non-vacant sites constitute more than 50 percent of RHNA for lower-income households, then a Housing Element must provide findings based on substantial evidence that existing use does not constitute an impediment to development and that it will likely be discontinued during the planning period. Per HCD guidance, the sum of lower-income RHNA capacity on vacant sites and other alternatives not related to capacity on non-vacant sites (including projected ADUs or units permitted, built, entitled or pending) should be used to determine this percentage.

The estimated capacity of vacant sites and other alternatives not related to capacity on non-vacant sites to accommodate the lower-income RHNA is 335 units, which constitutes 12.5 percent of RHNA for lower-income households. This is expected, considering Carson is nearly completely developed with only 2.3 percent of citywide land considered vacant. Further, much of the vacant land in Carson is either above a former landfill or is otherwise environmentally constrained. However, there are a sufficient number of non-vacant tier 1 opportunity sites with existing uses that are likely to discontinue during the planning period. As noted previously, these include the South Bay Pavilion Mall (APNs 7381024037 and 7381024038), the former Park Avalon Mobile Estates (APN 7332001034), the Links at Victoria Golf Course (APN 7339017902), and publicly owned parcels in the Carson Civic Center (APNs 7337005927, 7337006919, and 7337007904). The site located on the Victoria Golf Course, although identified as non-vacant, is technically vacant land that sits adjacent to the new recreational and commercial development at the Victoria Golf Course. Other tier 1 opportunity sites, as outlined in Table C-8, are also considered. The estimated development capacity of all vacant sites, RHNA credits, and non-vacant tier 1 opportunity sites is 2,378 units, which constitutes 81.1 percent of the RHNA for lower-income households. An additional 555 units located in tier 2 non-vacant sites are included to ensure a sufficient buffer of lower-income units.

SUMMARY

The City is committed to creating a long range and viable housing element in conjunction with its General Plan Update that looks ahead to ongoing community housing needs. Carson is a growing community with very little undeveloped land remaining. However, the City has approved a significant number of residential projects during the previous planning period and has identified a sufficient amount of vacant and non-vacant underutilized land to accommodate new development during the 2021-2029 planning period. The 2021-2029 Carson Housing Element Sites Inventory demonstrates capacity for 6,663 housing units, which is sufficient to satisfy the RHNA allocation (5,618 units) for the planning with a buffer in each income category (Table C-9).

The buffer is intended to ensure the City can navigate the no net loss provisions of State Housing Element law and have continued ability to meet the RHNA by income group throughout the

planning period, pursuant to Government Code Section 65583.2. The buffer was created by both including more capacity than required for each income category and by projecting site capacity at less than the maximum density, allowing for reductions in density at a project level, for a number of land use designations. Amendments to State law that came into force in 2018 require cities that allow development at reduced densities be prepared to meet remaining unmet RHNA need by income category within 180 days. If the remaining sites in the Inventory cannot accommodate the unmet RHNA by income category, the City must be prepared to rezone other sites where residential development is allowed regardless of any growth management restriction, open space or agricultural preservation policies.

Table C-9: Sites Inventory Summary

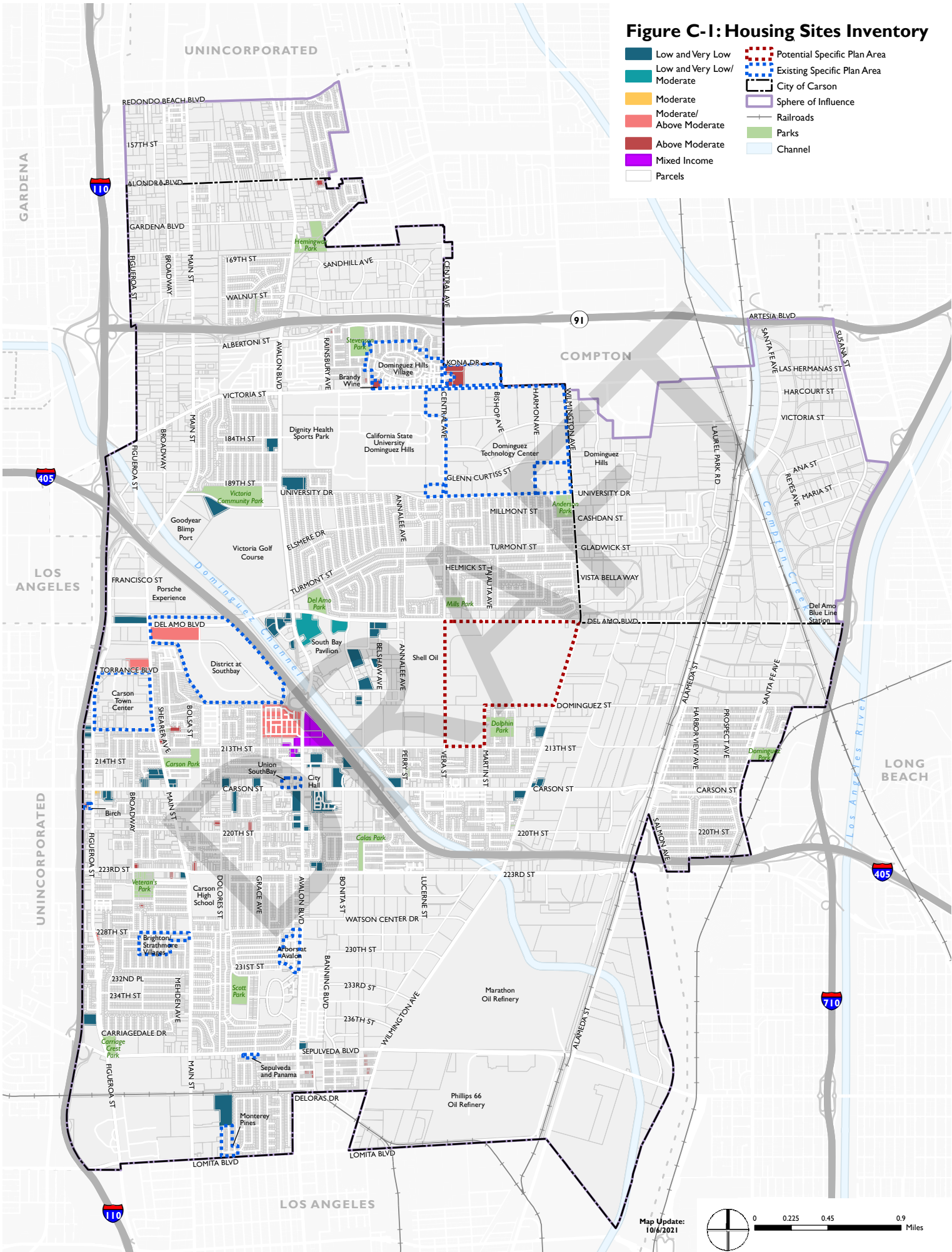
City of Carson 2021-29 Housing Element Sites Inventory Summary Pipeline, Projected ADUs and Remaining Vacant/Non-Vacant Sites																								
	Low and Very Low Income								Moderate Income								Above Moderate Income							
	LDR	MDR	HDR	DMU	CMU	FLX	Subtotal	% RHNA	LDR	MDR	HDR	DMU	CMU	FLX	Subtotal	% RHNA	LDR	MDR	HDR	DMU	CMU	FLX	Subtotal	% RHNA
Under Construction	0	0	0	0	0	0	0	0.0%	0	0	0	0	0	0	0	0.0%	0	0	0	0	0	0	0	0.0%
Approved	0	0	0	0	0	0	0	0.0%	0	0	0	0	0	0	0	0.0%	0	76	184	0	32	0	292	14.2%
Under Review	0	0	0	0	0	0	0	0.0%	0	0	0	496	0	642	1,138	130.1%	0	0	0	744	19	964	1,727	83.8%
Total Pipeline	0	0	0	0	0	0	0	0.0%	0	0	0	496	0	642	1,138	130.1%	0	76	184	744	51	964	2,019	98.0%
Projected ADUs							168	6.3%							17	1.9%							95	4.6%
Total RHNA Credits							168	6.3%							1,155	132.0%							2,114	102.6%
RHNA							2,683								875								2,060	
Surplus/Shortfall							-2,515								280								54	
Vacant	0	0	0	16	75	76	167	6.2%	0	0	0	14	0	0	14	1.6%	14	28	0	0	0	0	42	2.0%
Non-Vacant	0	0	18	1,852	278	450	2,598	96.8%	0	0	0	170	5	0	175	20.0%	0	0	0	219	11	0	230	11.2%
Realistic Capacity							2,765	103.1%							189	21.6%							272	13.2%
Total Site Capacity	2,933						109.3%	1,344						153.6%	2,386						115.8%			
GRAND TOTAL																					6,663			
TOTAL RHNA																					5,618			
% TOTAL RHNA																					118.6%			

Notes:

BRMU removed from summary table - no sites included in the Inventory.

No pipeline projects contain Low and Very Low Income units.

Figure C-1: Housing Sites Inventory



Source: County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021

Assessment of the Sites Inventory

An assessment of housing sites in consideration of the City's mandate to affirmatively further fair housing (AFFH) and other best practices recommended by HCD, including proximity to a variety of services, is provided in this section. Other requirements related to the City's AFFH mandate are discussed in Chapter 3 of this element.

PROXIMITY ASSESSMENT

Sites on the Inventory, especially those identified as suitable for lower-income households, conform to other best practices recommended by HCD, including proximity to transit routes, schools, jobs, parks, and daily services. Many identified sites contain a mix of income levels and are generally located throughout the city. Lower-income sites (including mixed-income sites) are located along or near the city's principal corridors and centers – including Carson Street, Avalon Boulevard, Del Amo Boulevard, and the Civic Center area. The sites are centrally located and generally have good access to opportunity, including existing parks, schools, shops, and other services.

Figures C-2 through C-6 provide maps of housing sites and their proximity to amenities and services like parks, transit, education, civic buildings, medical centers, and retail/commercial stores. Most development will consist of infill development and will not require additional services like new schools. Sites at all income levels are located in close proximity to these various amenities and services, or can easily access them through transit. Carson residents are served by several transit agencies, including Metro, Long Beach Transit, Compton Renaissance Transit, Gardena Transit, Torrance Transit, and the City's Carson Circuit. The Del Amo Station, which is a light rail station of the Blue Line (A Line) of the Los Angeles Metro, borders the city to the east and the Harbor Gateway Transit Center is a bus transport hub that serves the entire South Bay region, bordering Carson to the west. While both of these transit centers border industrial areas, and are likely difficult to walk to, both are accessible by bus or private vehicular travel. Bus routes are available on all of the city's major corridors, including Carson Street, Avalon Boulevard, Del Amo Boulevard and Figueroa Street.

There are a number of park types and recreation facilities in Carson. The city contains community parks, mini parks, regional parks, private parks, and recreational space at schools accessible through joint use agreements. Community parks are intended to provide a wide range of active and passive recreational opportunities, and are meant to serve one neighborhood or groups of neighborhoods. Mini parks are small parks that serve a limited area, often where land is not available for a neighborhood facility. Regional parks include the Victoria Community Regional Park and Victoria Golf Course. There are currently two regional parks, 12 community parks and four mini parks in the city, as well as a number of recreational facilities. All sites are in close proximity to these parks, which are also all accessible by transit.

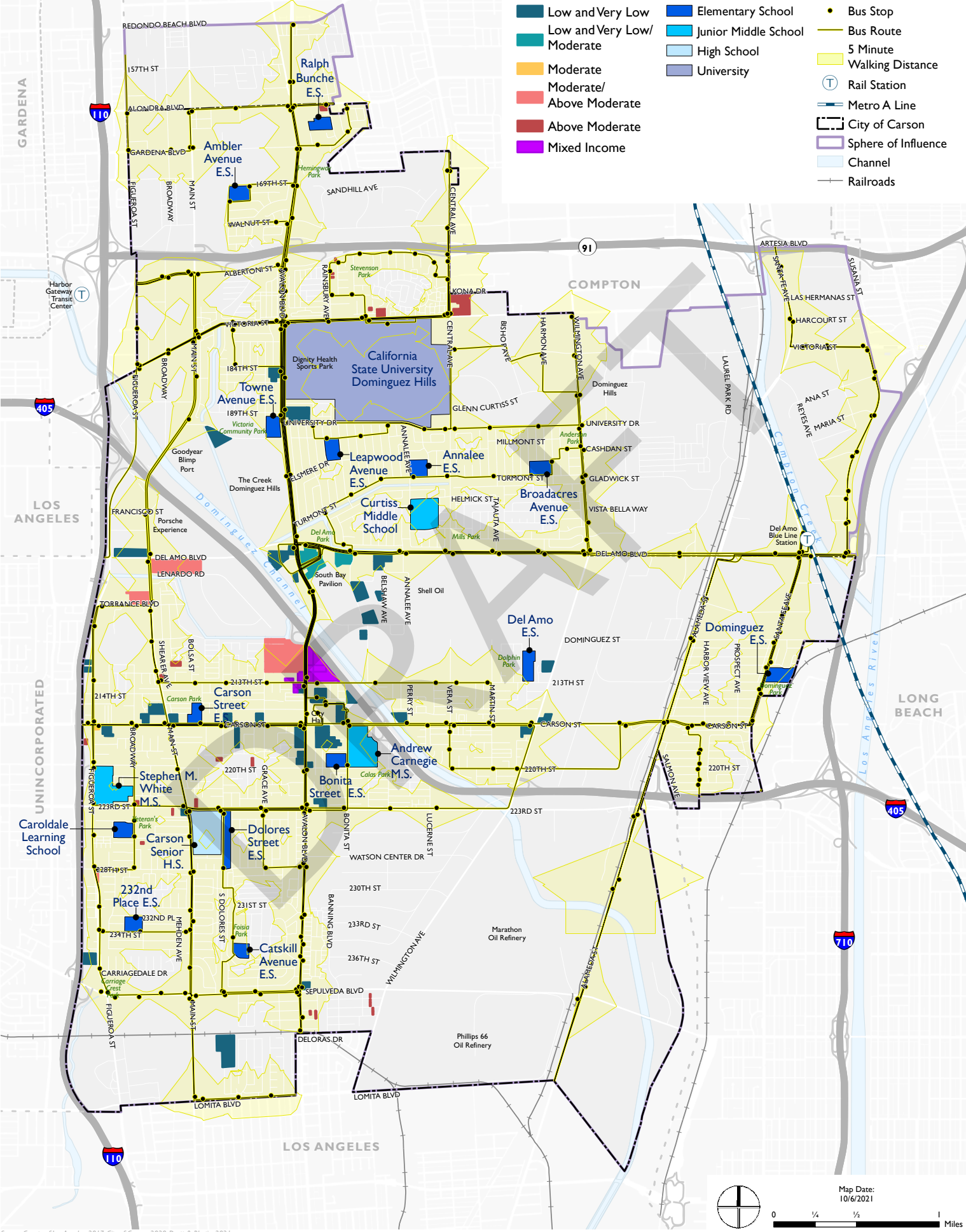
Civic buildings, educational facilities and medical centers are also present in Carson. Civic buildings are located throughout the city, with a concentration in Carson's Civic Center. The Civic Center includes City Hall, the Community Center, a sheriff's station, and a branch of the US Postal Service. As discussed previously, some of these civic sites are candidates for the development of lower-income housing. Other civic uses spread throughout the city include the Dr. Martin Luther

King Jr. Library, the Carson Regional Library, the Carson Corporate Yard, and a number of fire stations. The city contains a number of public schools operated by either the Los Angeles or Compton Unified School Districts, including elementary, middle, and high schools. These schools are located throughout the city and are all accessible by transit. California State University (CSU) Dominguez Hills is located in the northern portion of the City and is accessible by transit. Carson residents have access to a variety of medical centers, including those inside city borders and those in neighboring communities. The nearest hospitals are the Gardena Memorial Hospital, located to the northwest of Carson in Gardena, and the Harbor-UCLA Medical Center, located in Torrance to the west of Carson in Torrance. Medical centers within Carson are mainly located in the western portion of the city but are evenly distributed throughout the north and south.

As most sites are located along or adjacent to key corridors or city centers, they have convenient access – whether by bus, short-distance vehicular travel, or walking – to daily services such as grocery stores, restaurants, shopping, banks, gas stations, and other personal services. Further, the Carson Street Shopping District and South Bay Pavilion Mall are adjacent to or contain a number of identified sites. The South Bay Pavilion Mall includes retailers like Burlington, IKEA, JCPenney, Ross Dress For Less, and Target. All retail or commercial services is accessible by transit within the city.

In addition to access to services, the location of sites also provides good access to employment. The majority of Carson's jobs are located in the city's industrial areas to the north and west, although the retail area bordered by Avalon Boulevard to the west and Del Amo Boulevard to the north, including the South Bay Pavilion Mall, is also a major employment center in Carson. Most Carson residents commute to work via car, truck or van, and only about 3.1 percent of workers at least 16 years of age used public transportation according to 2015-2019 American Community Survey estimates. Carson is located at the convergence of several important regional freeways—including Interstate 110 (I-110), State Route 91 (SR-91), I-405, and I-710—which connect Carson to the greater Los Angeles metropolitan region. The Department of Housing and Urban Development (HUD) job proximity index provides a metric of access to employment within a neighborhood. As is shown Figure C-7, sites in the northern portion of the city are in the highest quintile (i.e., closest proximity to jobs), while most sites in the central portion of the city are in the second highest or middle quintile. Very few sites are in the lower quintiles (i.e., furthest proximity from jobs).

Figure C-2: Housing Sites Proximity to Education



Source: County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021

Figure C-3: Housing Sites Proximity to Parks & Recreation

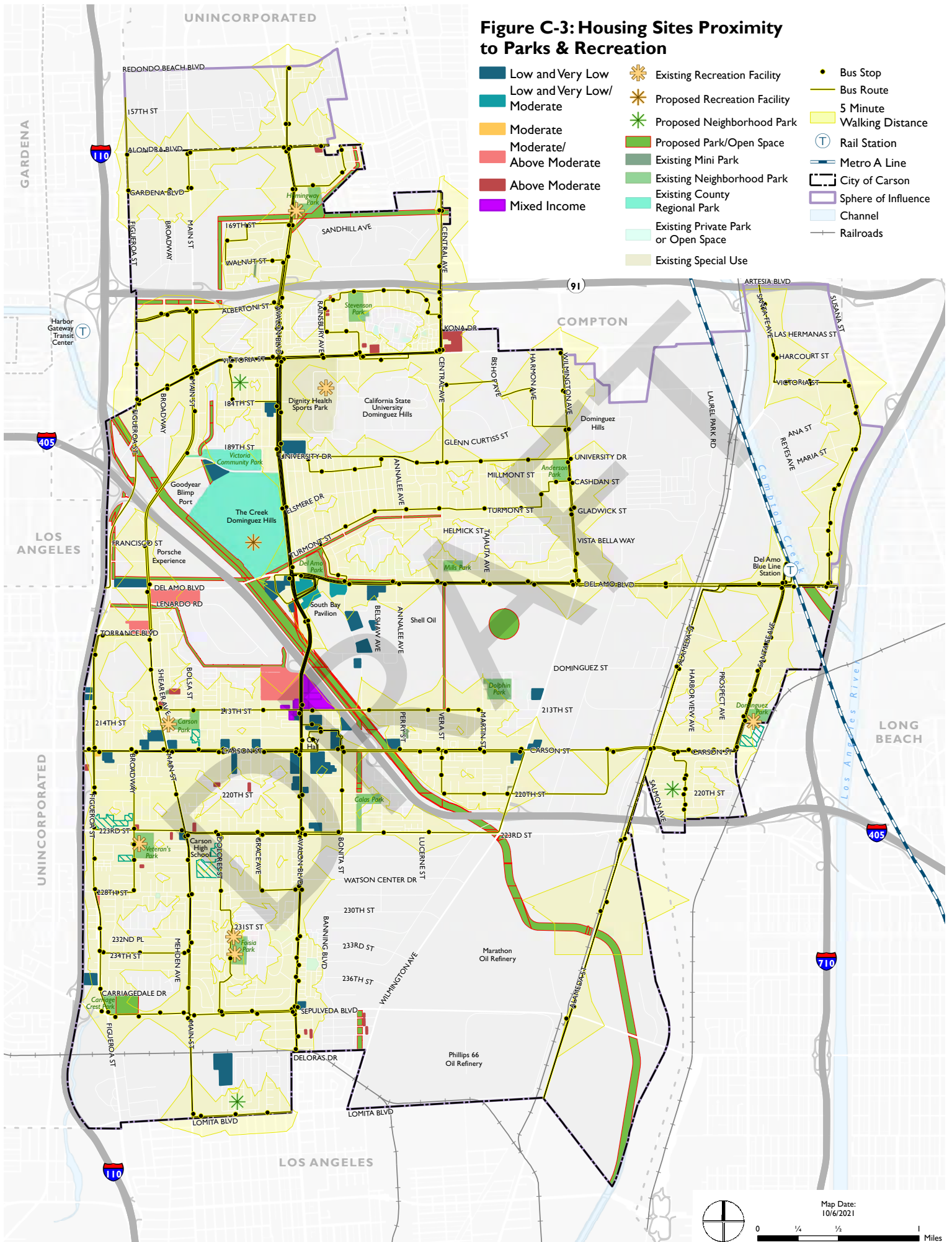
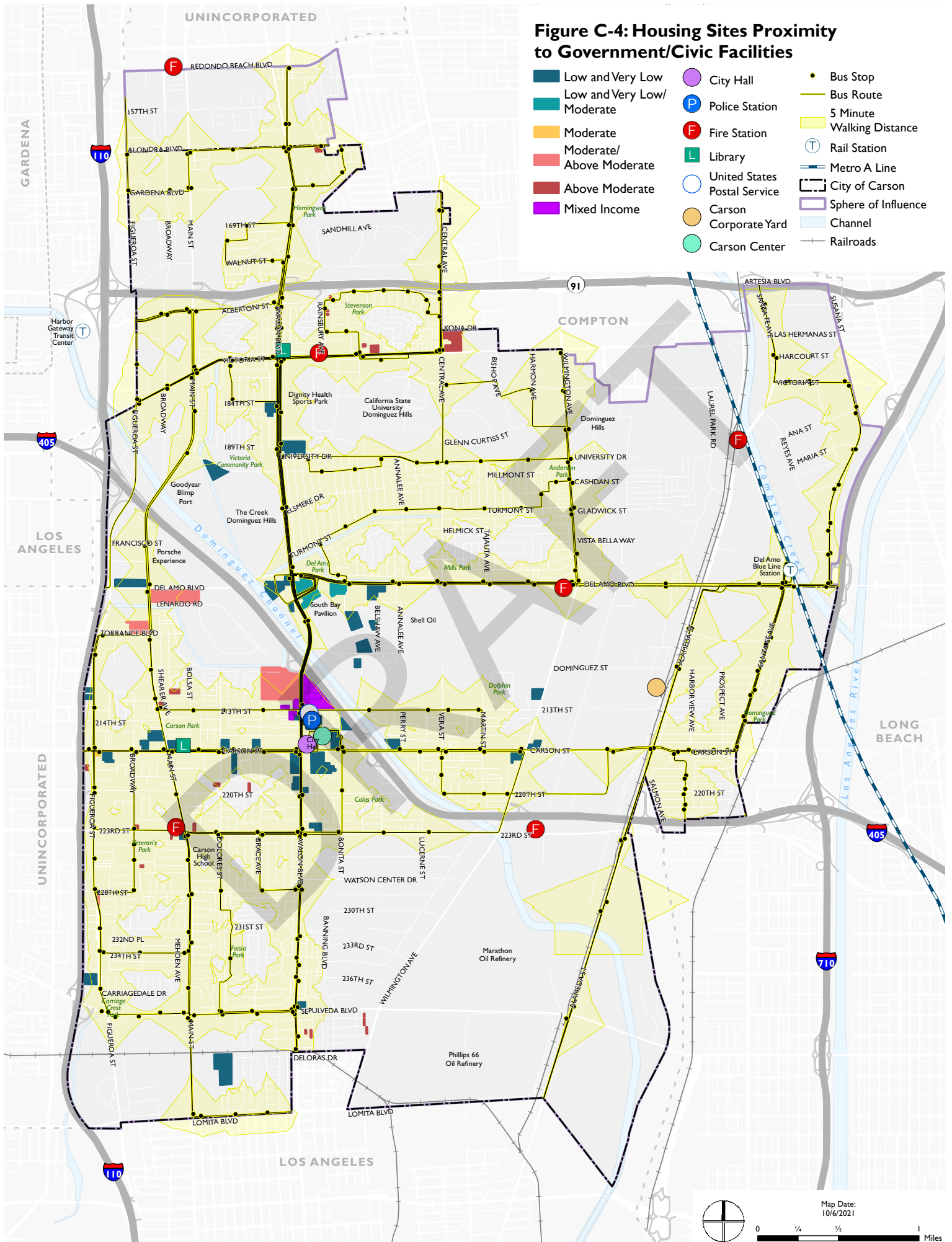


Figure C-4: Housing Sites Proximity to Government/Civic Facilities



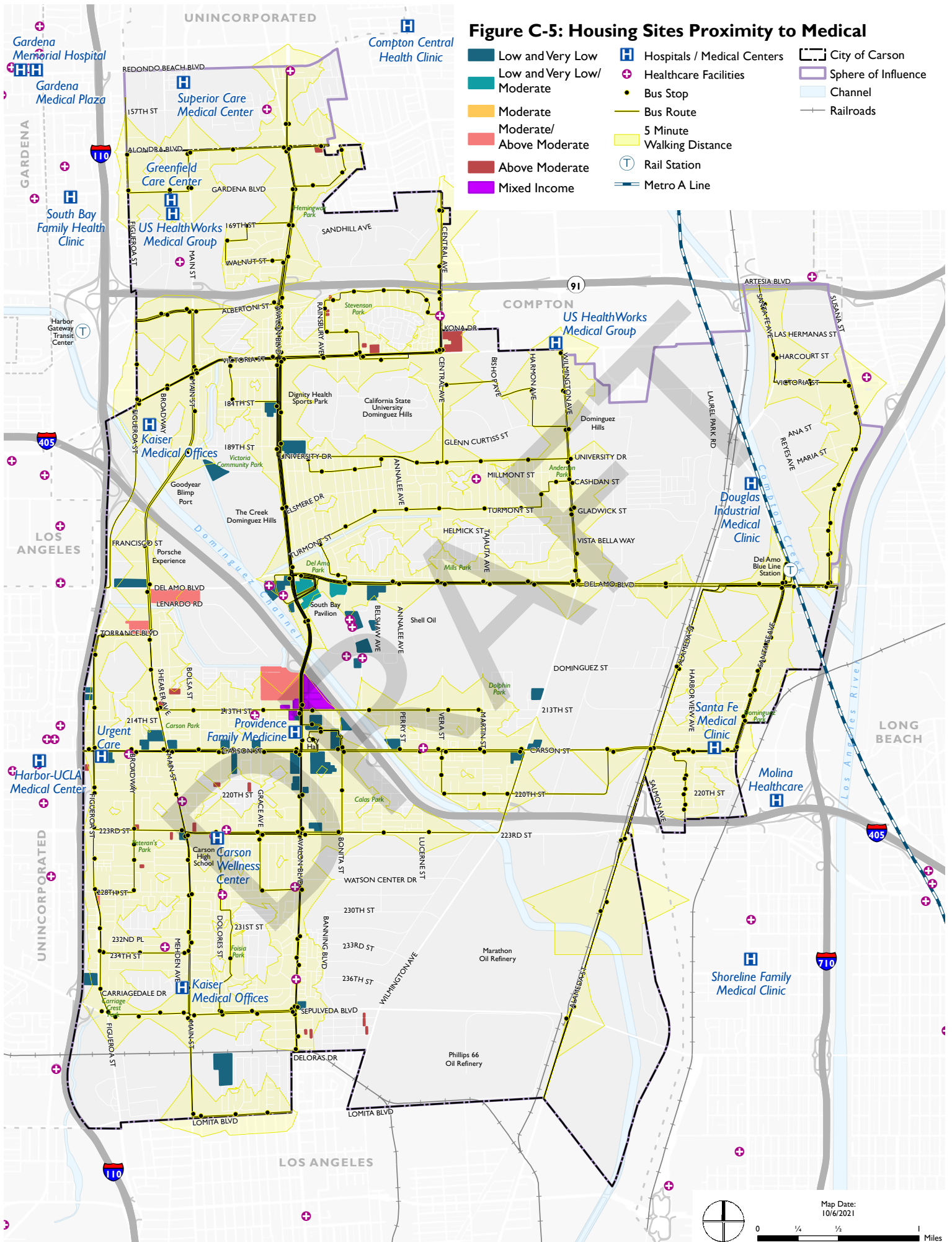


Figure C-6: Housing Sites Proximity to Commercial/Retail

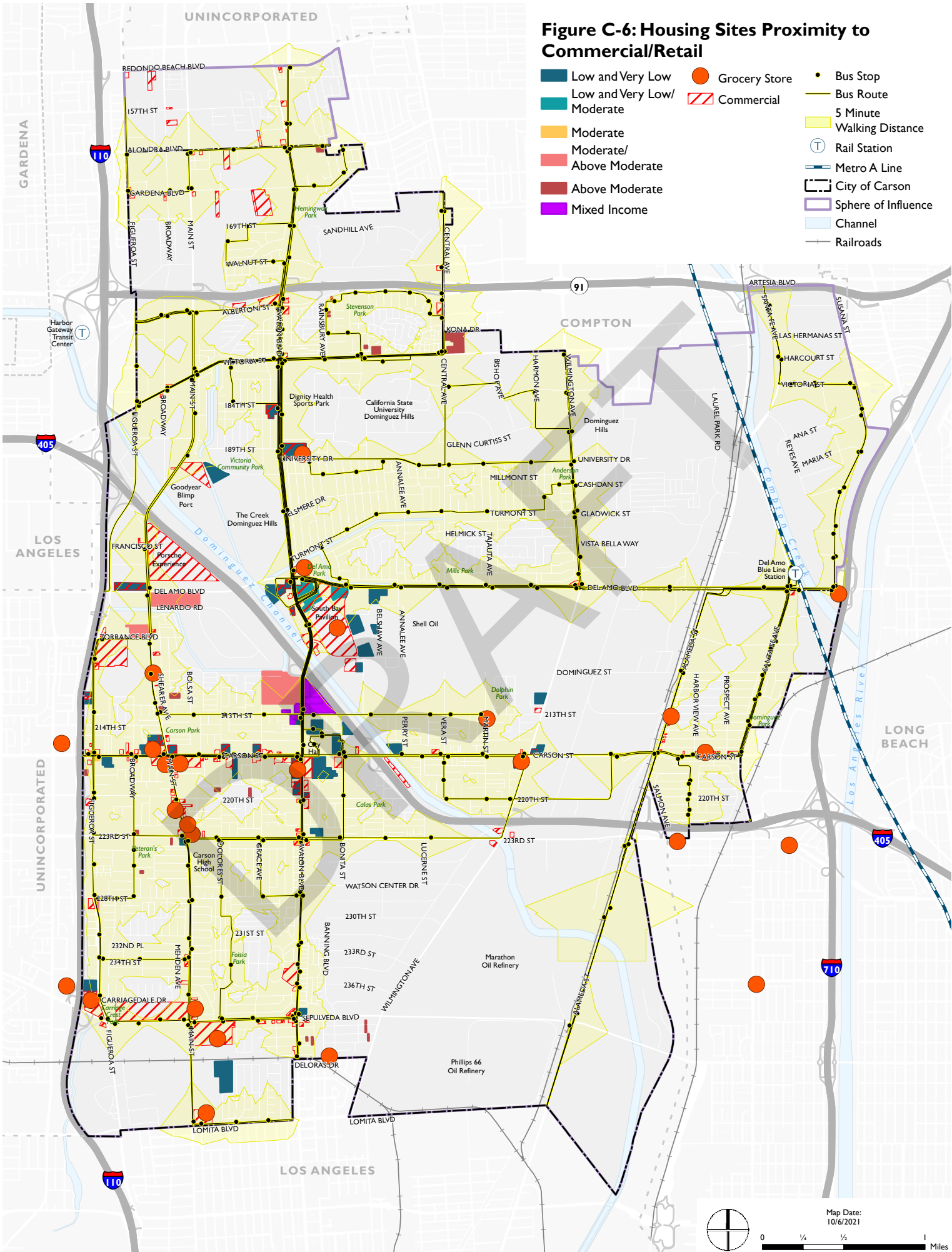
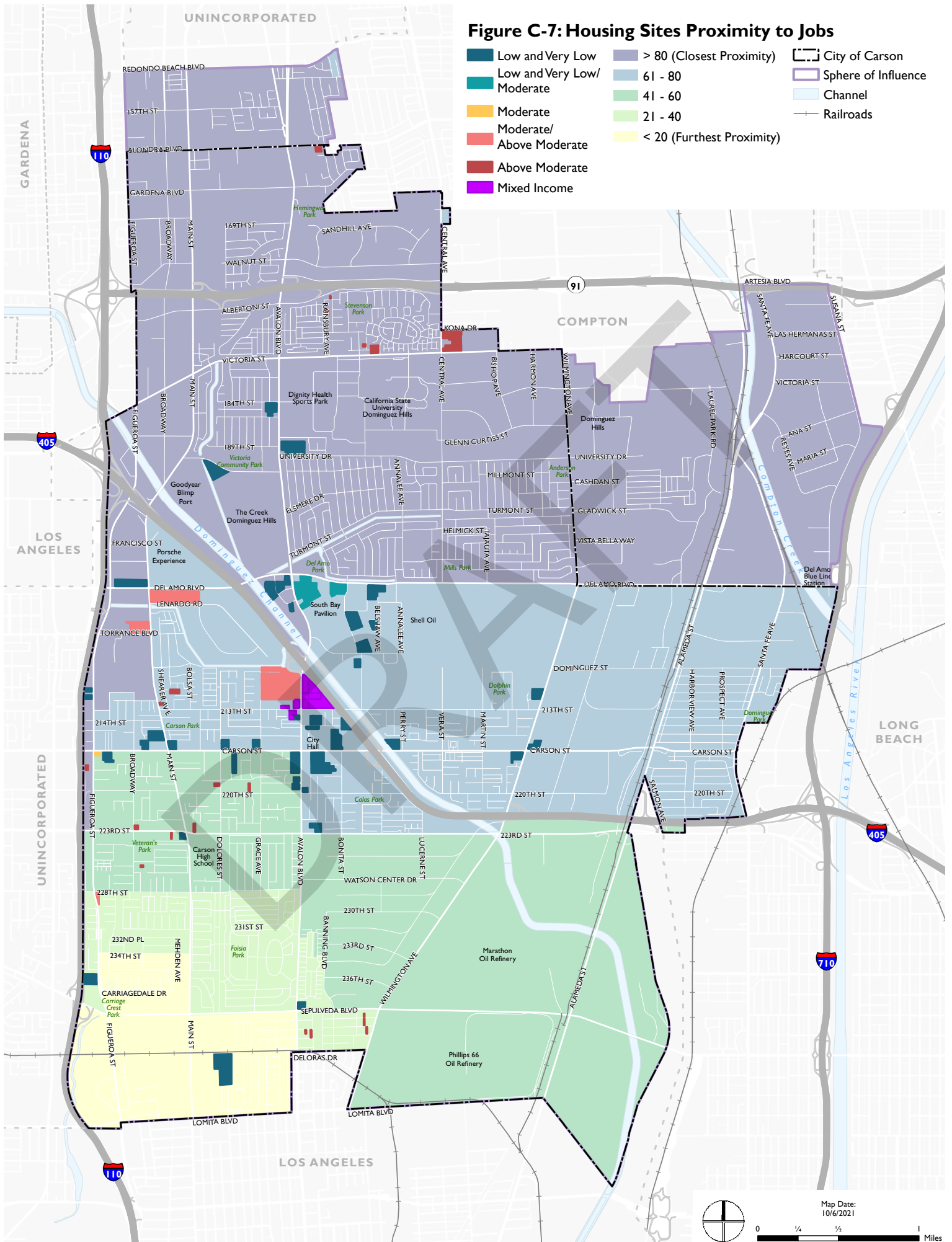
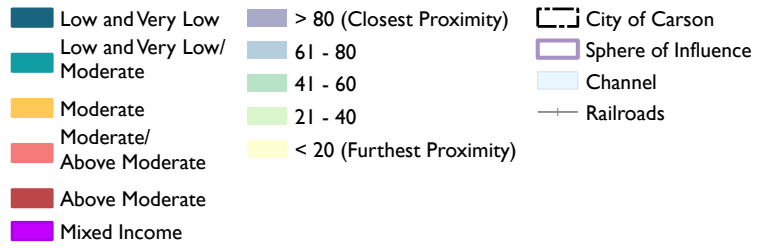


Figure C-7: Housing Sites Proximity to Jobs



SITES INVENTORY AND FAIR HOUSING

State law requires that the identification of sites must be consistent with a jurisdiction's duty to affirmatively further fair housing. To evaluate the consistency of the site inventory with this obligation, a jurisdiction should address improved conditions, exacerbated conditions and isolation of the RHNA (i.e., geographic concentration of units). Further, this evaluation should not be limited to lower-income RHNA sites. A thorough assessment of fair housing is provided in Chapter 3 of this element, including a consideration of segregation and integration, racially and ethnically concentrated areas of poverty and affluence (R/ECAPs and RCAAs), disparities in access to opportunity, and disproportionate housing needs.

Improved Conditions

HCD and the Tax Credit Allocation Committee (TCAC) have prepared a series of metrics to identify opportunity areas based on environmental, economic and educational outcomes within a jurisdiction. Using these metrics, HCD and TCAC have identified census tracts that range from "low resource" to "highest resource" or are otherwise areas of high segregation and poverty. There are no "highest resource" or high segregation and poverty tracts located in Carson.

Sites were selected due to their presence in corridors or cores with high access to opportunity, including areas targeted for development as part of the General Plan Update process. As noted above, these sites will have ample access to transit, jobs, services, and other amenities. Figure C-8 provides a map of HCD and TCAC's composite score opportunity areas overlaid with sites identified in the Inventory. Lower-income sites are mostly located in moderate or moderate (rapidly changing) tracts, with a number located in high resource tracts. Further, a number of sites located in low resource tracts along Avalon Boulevard, a major corridor, are located on the border of several high resource tracts. Moderate- and above moderate-income sites are also largely located in moderate resource or moderate resource (rapidly changing) tracts. Further, a number of sites contain a mix of incomes.

Exacerbated Conditions

Several sites are located in low resource areas. However, many of the low resource areas identified are adjacent to Avalon Boulevard, which is targeted as a major corridor in the General Plan Update. Sites located near the city core are located in areas that have seen significant development activity in recent years. Further, many of the sites are included as part of mixed-use projects that are either in the pipeline or under review and will, once complete, increase the level of opportunity in the area. Since many of these projects are mixed income, this will increase opportunity for households at all income levels.

As discussed in Chapter 3, levels of segregation for African American or Black households are moderate to high, with a significant concentration in the northern portion of the city. While a number of lower-income RHNA sites have been identified in this portion of the city, most are further south. Much of this land is designated as Light Industrial or Low Density Residential in the General Plan Update, or includes the CSU Dominguez Hills Campus, and would not be suitable for the development of lower-income housing. Further, although the tracts in the southwestern corner of the city are designated as high resource, much of the land within this area is occupied by the Joint Water Pollution Control Plant and would not be suitable for residential development.

Isolation of the RHNA

Almost all identified sites at any income level are located in the western portion of the city, with only two located east of Wilmington Avenue. However, given that the eastern portion of the city largely contains industrial uses this geographic concentration is appropriate. Likewise, there are no lower-income sites north of Victoria Street for the same reason. Sites to accommodate lower-income RHNA are located throughout the remainder of the city but are especially clustered along corridors and in core areas, including the Civic Center area. Most sites are located on or adjacent to Avalon Boulevard, which is a major corridor that runs from the north to the south of the city. Sites on this corridor will have good access to opportunity and improved conditions. Further, a number of sites were identified as able to accommodate a mix of incomes, ensuring that lower-income households will not be geographically isolated.

Figure C-8: Housing Sites Access to Opportunity

- | | | |
|-------------------------------|-----------------------------------------|---------------------|
| Low and Very Low | High Resource | City of Carson |
| Low and Very Low/
Moderate | Moderate Resource | Sphere of Influence |
| Moderate | Moderate Resource
(Rapidly Changing) | Channel |
| Moderate/
Above Moderate | Low Resource | Railroads |
| Above Moderate | Missing/Insufficient Data | |
| Mixed Income | | |

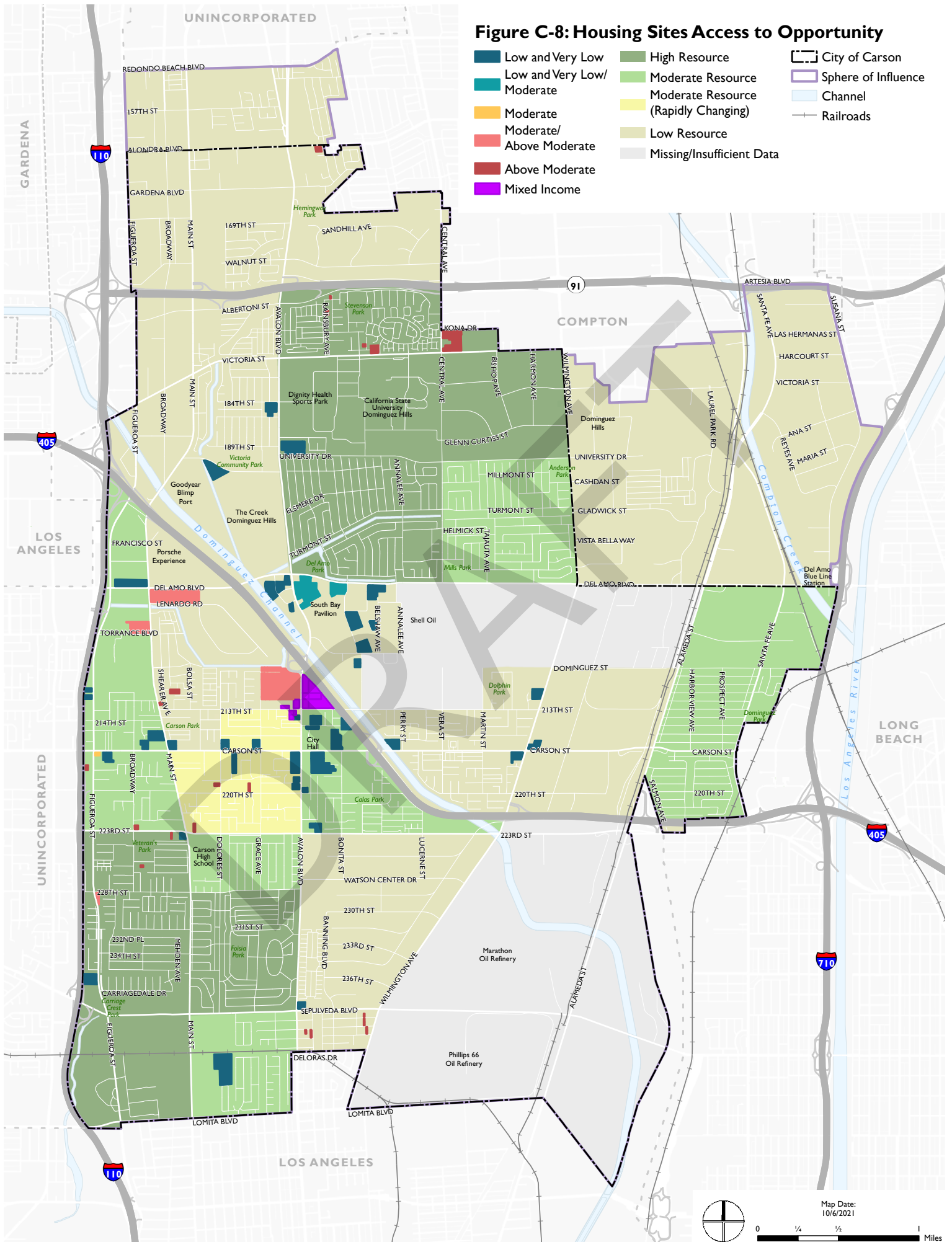


Table C-10: City of Carson 2021-2029 Housing Sites Inventory

[illegible]

APPENDIX D – Evaluation of the Prior Housing Element

Section 65588(a) of the Government Code requires jurisdictions to evaluate the effectiveness of the previous Housing Element, the progress made towards implementing progress during the prior planning period, and the appropriateness of the housing goals, policies, and programs.

The City of Carson outlined a number of goals, policies, strategies and programs during 2014-2021 planning period. The seven goals described in the previous Housing Element include:

- Improvement and maintenance of the existing housing stock while preserving affordability.
- Maintenance and enhancement of neighborhood quality.
- The City shall seek to provide an adequate supply of housing for all economic segments of the City.
- The protection of the existing supply of affordable housing.
- Housing opportunities to all persons regardless of race, religion, ethnicity, sex, age, marital status, household composition, or other arbitrary factor.
- Long-term maintenance of private properties with common area ownership, such as condominiums and planned unit developments.
- Conservation of natural resources and reduction of energy consumption in all areas of residential development.

Each goal has specific policies that were to be accomplished to address the community's identified housing needs. Each policy describes specific actions the City would or could take to achieve the stated goals. Further, nine affordable housing strategies each with specific implementation programs were provided – including Housing Improvement, Housing Development Assistance, Support of Affordable Housing, Rental Assistance, Homeownership Assistance, Fair Housing, Energy Conservation, Foreclosure Programs, and Sites Inventory Programs. Each implementation program has a time frame for completion along with a potential funding source and a responsible agency to monitor the program. Where applicable goals, policies, and programs have been continued into the 2021-2029 Housing Element and including in the Housing Action Plan (Chapter 6).

The accomplishments of the 2014-2021 Housing Element are provided in Tables D-1 and D-2 below. Table D-1 outlines residential development by income category during the 2014 to 2021 period. Table D-2 evaluates affordable housing strategies and programs. Per Table D-1, the City accommodated about 77.3 percent of its total 5th cycle RHNA, with a surplus of above moderate-income units and shortfalls of very low-, low-, and moderate-income units.

Table D-1: Residential Permits Issued by Income Category, 2014-2020

<i>Income Category¹</i>	<i>2014</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>	<i>2018</i>	<i>2019</i>	<i>2020</i>	<i>Total to Date</i>	<i>Percent of RHNA</i>
Very Low-Income	4	0	0	24	68	0	0	96	21.5%
Low-Income	15	0	0	26	41	0	0	82	31.2%
Moderate-Income	44	0	0	46	0	0	150	240	85.7%
Above Moderate-Income	25	81	81	80	374	248	6	895	126.4%
Total	88	81	81	176	483	248	156	1,313	77.3%

I. Very low-, low-, and moderate-income totals include both deed and non-deed restricted units.

Source: City of Carson, Annual Progress Report, 2020

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
STRATEGY I: HOUSING IMPROVEMENT						
PROGRAM I.1	Residential Rehabilitation Program (Neighborhood Pride Program)	Provide financial assistance via loans & grants to provide basic housing repairs and remedy code violations.	Loans and grants were provided for substantial rehabilitation of owner-occupied single-family dwellings. During the 2014-2020 period, the program rehabbed 188 units, including both single-family homes and mobilehomes.	N/A	Yes	Age of housing stock and community demand justify continuation of program.
PROGRAM I.2	Code Enforcement Program	Bringing properties into code compliance for protection of public's health & safety.	Responded to 11,494 total complaints during the 2014-2020 period and handled 3,290 total cases from 2013-2021.	N/A	Yes	Continue program to protect the health, safety, and welfare of residents.
PROGRAM I.3	Residential Property Report (RPR) Program	Enable City to verify that properties being sold/transferred meet zoning & building code requirements.	Processed approximately 2,995 RPRs before the program was eliminated in 2019.	N/A	No	This program was eliminated in 2019.
PROGRAM I.4	Foreclosure Registration Program	Reduce blight and code violations through penalties for irresponsible property owners, resources to track and maintain vacant properties.	The City registers over 200 foreclosed residential properties and collects registration fees annually from financial institutions and beneficiaries and contracts with a private firm to provide monitoring	N/A	Yes	Continue program to monitor foreclosures and to protect the health, safety, and welfare of residents.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
			services. On average, the City collects \$100,000 annually and spends \$40,000 on the program administration.			
PROGRAM I.5	Residential Neighborhood Safety Program	Offers a range of neighborhood safety programs through the Public Safety Division including neighborhood watch, property identification, community forums, residential security survey, crime prevention, and community relations.	There were consistently between 180 and 200 active neighborhood watch groups/block captains during the 2014-2020 period. The Division continues to offer the following services: Code Enforcement Services, Parking Enforcement, Office of Emergency Management, Community Safety Partnerships, CERT (Community Emergency Response Team), Public Safety Town Hall Meetings, and Citation Information.	N/A	Yes	Continue program to protect the health, safety, and welfare of residents.
PROGRAM I.6	Mobilehome Park Maintenance Program	Protect affordability of units through rent control & provision of loans/grant assistance for mobilehome rehabilitation.	Rehabbed 79 mobilehomes during the period. The Mobilehome Space Rent Control Ordinance was amended in 2018 to establish the CPI Rent Increase, allowing for three types of rent increases in mobile home parks. Rent	N/A	Yes	Continue program, as this serves to preserve/maintain a form of affordable housing.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
			increase applications reviewed and Mobilehome Rental Review Board hearings scheduled as applications are received and processed.			
PROGRAM 1.7	Lead-Based Paint Testing and Abatement Program	Provide testing & abatement to single-family & mobilehomes that are acquired or rehabilitated.	This inspection program is conducted in conjunction with other housing rehabilitation programs in the City. Approximately 123 units tested for lead and 27 units were abated under the lead-abatement program during the period.	N/A	Yes	Continue program to protect the health, safety, and welfare of residents.
STRATEGY 2: HOUSING DEVELOPMENT ASSISTANCE						
PROGRAM 2.1	Development Funding for Multifamily Housing	Development assistance to promote the development of affordable multifamily housing.	Development funding was provided to 4 multiple family housing projects during the period, including the Via 425 Phase II, the VEO project, Veteran's Village, and Carson Arts Colony.	EL: 14 VL: 29 L: 24 M: 44 AM/U: 169	Yes	Continue program to continue to provide and expand the supply of decent, safe, sanitary, and affordable housing to low- and moderate-income residents.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
PROGRAM 2.2	Mixed Use Development	Incorporation of residential component to a commercial development.	Three mixed use projects were assisted during the period, including the VEO project, Veteran's Village, and the Bella Vita. The City maintains two mixed-use zones, MU-CS and MU-SB, as well as the MUR mixed-use overlay district.	EL: 12 VL: 57 L: 20 M: 23 AM/U: 147	Yes	Continue program to continue to provide and expand the supply of affordable housing in a mixed-use configuration.
PROGRAM 2.3	Housing Development Through Development Agreements	Encouraging the development of affordable housing via development agreements.	Three developments were assisted during the period, including the Via 425 Phase II project.	EL: XX VL: XX L: XX M: XX AM/U: XX	Yes	Continue program to continue to provide and expand the supply of decent, safe, and sanitary housing for all segments of the population.
PROGRAM 2.4	Assess Use of City-Owned/Publicly-Owned Land for Affordable Housing	Evaluate alternative means to provide affordable housing.	Identified sites comprising approximately \$20 million in land value/projected to accommodate 150 units. The 51-unit affordable Veteran's Village project was developed partly on land owned by the Carson Successor Agency.	EL: 5 VL: 20 L: 0 M: 0 AM/U: 26	Yes	Continue program and assess feasibility of retaining a qualified development project on Agency/City land meeting Agency criteria.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
PROGRAM 2.5	Alternative Affordable Housing Finance Programs	Assess a variety of funding for the construction of new affordable housing.	Ongoing coordination with developers to obtain TCAC tax credit approval and access CDBG funding. The City received \$793,714 in CDBG funds for program year 2021, and expects to receive equivalent amount in subsequent years. Funds are used to expand affordable housing options, maintain and promote neighborhood preservation, support public services, and promote community development programs.	EL: XX VL: XX L: XX M: XX AM/U: XX	Yes	Continue program to pursue and retain several qualified financing sources and investment partners.
PROGRAM 2.6	Development of Special Needs Housing	Facilitate the development of special needs housing for seniors, homeless persons, and disabled persons.	Ongoing developer assistance to provide special needs housing as needed. The City assisted in the development of one senior housing project, the Bella Vita. According to HUD, nearly 24.6 percent of publicly supported housing units in Carson are accessible to persons with disabilities, which exceeds	EL: 7 VL: 37 L: 20 M: 0 AM/U: 1	Yes	Continue program so that the needs of these special needs housing communities are accommodated. Amend the Zoning Ordinance to reduce constraints to the development of residential

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
			the proportion persons with disabilities in the city.			community care facilities.
PROGRAM 2.7	Emergency Shelters	Amend ordinance to permit emergency shelters by right in the ML & MH industrial zones.	On 7/16/13 – City Council approved the ML & MH Industrial zone districts for emergency shelters use by right for up to 30 occupants.	N/A	Yes	Identify appropriate zones for emergency shelters use by right following adoption of the General Plan. Continue to monitor the inventory of sites appropriate to accommodate emergency shelters, and work with appropriate organizations to ensure the needs of the homeless population and extremely low-income households are met.
PROGRAM 2.8	Transitional and Supportive Housing	Amend ordinance to permit transitional/supportiv	On 7/16/13 – City Council approved the RA, RS and RM residential zone districts for	N/A	Yes	Following adoption of the General Plan, amend the

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
		e housing in all residential zones.	transitional/supportive housing use by right.			Zoning Ordinance to remove constraints to transitional and supportive housing. Continue to monitor the inventory of sites appropriate to accommodate transitional and supportive housing, and work with appropriate organizations to ensure the needs of the homeless population and extremely low-income households are met.
PROGRAM 2.9	Single Room Occupancy (SRO) Housing	Permit SRO's in at least one non-residential zone as permitted by right.	On 7/16/13 City Council approved the RM residential zone districts with an administrative site plan design review application.	N/A	Yes	Following adoption of the General Plan, amend the Zoning Ordinance to clarify

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
						development restrictions for SRO's. Continue to monitor the inventory of sites appropriate to accommodate SRO's, and work with appropriate organizations to ensure the needs of the homeless population and extremely low-income households are met.
PROGRAM 2.10	Reasonable Accommodation (housing for the persons with disabilities)	Amend ordinance to facilitate the development of housing for persons with disabilities.	City Council approved Ordinance No. 1485 in March 2012.	N/A	Yes	Continue to carry out adopted reasonable accommodation procedures and make residents aware of funds available from the Residential Rehabilitation Program.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
PROGRAM 2.11	Housing for Persons with Developmental Disabilities	Facilitate the development and rehabilitation of housing to accommodate persons with developmental disabilities.	This program was not continued in the Annual Progress Reports.	N/A	Yes	Continue the program to provide housing for persons with developmental disabilities, a special needs group. Seek State and federal funding and provide regulatory incentives to facilitate such projects. Reach out annually to developers of supportive housing to encourage the development of such projects.
STRATEGY 3: SUPPORT OF AFFORDABLE HOUSING						
PROGRAM 3.1	Preservation of At-Risk Housing	Monitor at-risk housing & educate tenants on potential of purchase of units.	150 units have five-year renewal contracts w/HUD or Section 8 vouchers. According to the California Housing Partnership, 100 units are at moderate risk of conversion in the Carson Garden	N/A	Yes	Continue program so that at-risk units are preserved.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
			Apartments and 30 units are at very high risk of conversion in Grace Manor.			
PROGRAM 3.2	Development of Multifamily Housing	Facilitate the development of multifamily housing.	On-going coordination of assistance with developers with available financial programs or limited financial resources including land write-downs and the use of development agreements. Multifamily projects assisted by the City during the planning period include Via 425 Phase II, the VEO project, Veteran's Village, and Carson Arts Colony.	EL: 14 VL: 29 L: 24 M: 44 AM/U: 169	Yes	Continue program to increase the supply of multifamily housing, particularly affordable multifamily housing, in the community. The City will remove the requirement to obtain a conditional use permit for multifamily housing during the Zoning Ordinance update.
PROGRAM 3.3	Density Bonus Program	Incentives for development of affordable multifamily housing.	The City Council approved the Density Bonus Ordinance on 9/21/10. No projects have been	None	Yes	Continue program to encourage developers to

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
			developed under the density bonus provisions during the planning period.			utilize the density bonus program in order to increase the supply of affordable units in the City. The City will amend the Density Bonus Ordinance to remain compliant with State law during the Zoning Ordinance update.
PROGRAM 3.4	Mobilehome Park Ownership/Conversion Program	Assess funding for mobilehome parks that convert to condo use.	Ongoing monitoring of potential conversion activity. A number of mobilehome parks have closed in recent years, and none have been converted to condos.	N/A		
PROGRAM 3.5	Second Unit Dwelling Program	Implement strategies to encourage the development of 2nd units on R-1 zoned properties.	41 ADUs were built during the period.	41	Yes	Continue program to increase the supply of ADUs in the City. The City will amend the Accessory Dwelling

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
						Ordinance to remain compliant with State law during the Zoning Ordinance update.
PROGRAM 3.6	Incentives for Large Multifamily Units	Incentivize the development of large multifamily housing.	This program was not continued in the Annual Progress Reports.	XX	Yes	Given the lack of larger rental units, this program should be re-introduced. The City should develop a menu of incentives and advertise at City Hall and the City's website information about available development incentives and any available funding sources. Initiate this program starting in 2022 and implement on-going thereafter.

STRATEGY 4: RENTAL ASSISTANCE

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
PROGRAM 4.1	Section 8 Rental Assistance Program	Provision of rental subsidies to very low-income households.	272-355 Section 8 vouchers were provided annually in Carson during the period.	N/A	No	The Section 8 Housing Choice Voucher program is not directly administered by the City, but rather by the Los Angeles County Development Authority (LACDA). Efforts to promote Section 8 vouchers should be incorporated into a general rental assistance program.
PROGRAM 4.2	Rental Assistance (General)	Maintain quality affordable rental housing for low- and very low-income households.	105-189 households received assistance valued at between \$79,297 and \$214,344 annually.	N/A	Yes	Continue providing rental subsidies to preserve housing options and assure continued decent, safe, and sanitary housing for low- and very low-income households. Incorporate the promotion of

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
						Section 8 vouchers, which are administered by LACDA.
	Rental Assistance (COVID-Related)	Assist persons at risk of eviction due to loss of income.	Program instituted in 2020. By year's end, 13 families received assistance totaling \$55,967.	N/A	Yes	Continue providing rental subsidies to assist households at risk of eviction due to COVID-induced income loss. Maintain this program for the duration of the COVID-19 pandemic.
STRATEGY 5: HOMEOWNERSHIP ASSISTANCE						
PROGRAM 5.1	First Time Home Buyers Program	Provide first time home buyers with down payment assistance.	Since 2019, this program is no longer operating. No loans were closed in prior years for this program.	N/A	No	This program did not close any loans and is no longer operating.
PROGRAM 5.2	Mortgage Credit Certificate Program	Assist first time home buyers via federal tax credits to qualify for a mortgage loan.	The City currently provides information on the Mortgage Credit Certificate Program at City Hall and is involved with ongoing coordination with lenders to assist first-time home buyers.	N/A	Yes	Continue program to support home ownership opportunities for low- and moderate-income households within the City.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
						Provide information on the program on the City's website.
STRATEGY 6: FAIR HOUSING						
PROGRAM 6.1	Discrimination Investigation, Tenant/Landlord Mediation, and Legal Services Assistance (Fair Housing Services Program)	Dispute resolution on housing discrimination complaints.	The City is involved in the ongoing processing of complaints, including assisting 147 persons in 2020.	N/A	Yes	Continue program to promote and maintain fair housing opportunities within the City.
STRATEGY 7: ENERGY CONSERVATION						
PROGRAM 7.1	Energy Conservation	Encourage use of and support energy saving programs provided by utility companies.	City Center Senior Project developed as a Green housing project; City awarded SolSmart Gold certification; and Clean Power Alliance (CPA) program.	N/A	Yes	Continue and expand program to promote green housing development.
STRATEGY 8: FORECLOSURE PROGRAMS						
PROGRAM 8.1	Foreclosure Crisis Program	Refer at-risk residents to pre & post foreclosure services.	No families were assisted under this program during the period.	N/A	No	The foreclosure crisis is not as acute as it was during the implementation of the prior Housing Element.

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
						As no families were assisted during the previous planning period, the program should not be continued.
PROGRAM 8.2	Neighborhood Stabilization Program	Stem neighborhood decline.	Since 2019, this program is no longer operating. No homes were rehabbed in prior years for this program.	N/A	No	The foreclosure crisis is not as acute as it was during the implementation of the prior Housing Element. As no families were assisted during the previous planning period and the program is no longer operating, the program should not be continued.
STRATEGY 9: SITES INVENTORY PROGRAMS						
PROGRAM 9.1	Sites Inventory Monitoring Program	Monitor and update a sites inventory.	The 2014-2021 Housing Sites Inventory identified sufficient land to accommodate the City's RHNA.	N/A	Yes	Continue this program to better accommodate the City's

Table D-2: Evaluating Affordable Housing Strategies and Programs Since 2014 (Based on 2014-2021 Carson Housing Element)

<i>Program No.</i>	<i>Program</i>	<i>Objective</i>	<i>What has the City accomplished?</i>	<i>Units produced by Income Category¹</i>	<i>Should this goal/policy be retained in the update?</i>	<i>Comments and Recommendations for Program's Continuation</i>
						RHNA. Maintain an adequate buffer of sites to satisfy "no net loss" requirements and maintain an accessible housing sites inventory available to both non-profit and for-profit developers to facilitate development.

1. EL=Extremely Low, VL=Very Low, L=Low, M=Moderate, AM=Above Moderate, U = Unrestricted. Applies to production related programs only. Units may be produced under multiple programs and should not be summed.

APPENDIX E – Analysis of Impediments to Fair Housing Choice

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2020 CITY OF CARSON

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:



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Draft for Public Review
March 19, 2020

Has Your Right to Fair Housing Been Violated?

If you feel you have experienced discrimination in the housing industry, please contact:

Housing Rights Center – Los Angeles

3255 Wilshire Blvd., Suite 1150
Los Angeles, CA 90010
Phone: 800-477-5977
Fax: (213) 381-8555

Housing Rights Center – Pasadena

Jackie Robinson Center
1020 N. Fair Oaks Avenue
Pasadena, CA 91103
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Housing Rights Center – Van Nuys

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Section I. Executive Summary

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.¹

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking “meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics”.² Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.³ Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U. S. Department of Housing and Urban Development’s (HUD) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.⁴

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named “Assessment of Fair Housing”, or AFH.⁵ The assessment would now include an evaluation of equity, the distribution of community assets, and access to

¹ https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law

² § 5.152 Affirmatively Furthering Fair Housing

³ § 5.152 Affirmatively Furthering Fair Housing

⁴ 42 U.S.C.3601 et seq.

⁵ 80 FR 42271. <https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing>

opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.⁶ Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Carson certifies that it will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Socio-Economic Context

The population and the racial and ethnic makeup of the City of Carson are not changing significantly. Limited English Proficiency includes an estimated 12.2 percent of the population speaks Spanish at home, followed by 7.4 percent speaking Tagalog. In 2017, some 23.2 percent of the population had a high school diploma or equivalent, another 34.7 percent have some college, 17.4 percent have a bachelor's degree, and 6.1 percent of the population had a graduate or professional degree.

In 2018, unemployment in the City of Carson was at 4.9 percent, compared to 4.1 percent for the State of California. This is representative of a labor force of 46,518 people and 44,232 people employed. Real per capita income in Los Angeles County has remained steady with the state rate in

⁶ 83 FR 683 (January 5, 2018)

recent years. However, poverty has grown to 12.8 percent in the City of Carson, representing 9,759 persons living in poverty in the City.

The City experienced a drop-off in housing production during the recent recession, though production has begun to recover somewhat. In 2018, there were 153 total units produced in the City, with 149 of these being multifamily units. Single-family unit production declined beginning in 2004 and have increased slightly since that time. The value of single-family permits, however, has continued to rise until 2015, reaching \$450,506, before dropping off to \$123,750 in 2018. Since 2010, the City has seen a decline in the proportion of vacant units to 2.8 percent but has experienced a rise in the proportion of “other” vacant units.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the City of Carson has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1 provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice.
2. Medium: Factors that have a less direct impact on fair housing choice, or that the City of Carson has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the City of Carson has limited capacity to address.

Contributing Factors	Priority	Justification
High levels of segregation	High	Black households have moderate to high levels of segregation when considered on the whole of the City of Carson. This is demonstrated by the Dissimilarity Index. The concentration of black households was seen primarily in northern Carson.
Access to School Proficiency	Med	Black households have lower levels of access to proficient schools in the City. However, the City has little control over impacting access on a large scale
Insufficient affordable housing in a range of unit sizes	High	Some 36.8 percent of households have cost burdens. This is more significant for renter households, of which 52.4 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black households are higher than the jurisdiction average according to 2008-2018 HMDA data.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 56.6 percent of persons aged 75 and older have at least one form of disability.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

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FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table I.2, summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
Review zoning and municipal codes for barriers to housing choice	High levels of segregation Discriminatory patterns in Lending	Segregation	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years. Record activities annually.
Increase availability of accessible housing	Insufficient accessible affordable housing	Disability and Access	Review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments over the next five (5) years. Record activities annually.
Promote housing opportunities in high opportunity areas	Insufficient accessible affordable housing	Disproportionate Housing Need	Continue to use CDBG and HOME funds to fund housing rehabilitation for homeowner and rental housing option 150 residential housing units over five (5) years.
Promote community and service provider knowledge of fair housing	Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Fair Housing Enforcement and Outreach	Continue to promote fair housing education through annual or biannual workshops. Maintain records of activities annually. Ensure that fair housing education materials are available in the Spanish language. Maintain records of activities annually. Promote annual outreach and education related to credit for prospective homebuyers. Maintain records of activities annually. Partner with community agencies to provide financial literacy classes for prospective homebuyers on an annual basis. Maintain records of activities annually.

Section II. Community Participation Process

The following section describes the community participation process undertaken for the 2020 City of Carson Analysis of Impediments to Fair Housing Choice.

A. OVERVIEW

The outreach process included the Fair Housing Survey, a Fair Housing Forum, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey. As of the date of this document, six responses have been received.

The Fair Housing Forum was held on February 3rd in order to gather feedback and input from members of the public.

The Draft for Public Review AI was made available on March 19th, 2020 and a 30-day public input period was initiated.

A public hearing will be held following the public review period in order to gather additional feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final report is intended to be made available early in May, 2020.

B. THE 2019 FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the City of Carson were invited to participate. At the date of this document, some six responses were received. A complete set of survey responses can be found in **Section IV.I Fair Housing Survey Results**.

C. FAIR HOUSING FORUM

A Fair Housing Forum was held on February 3, 2020. A summary of the comments received during this meeting will be included below. The complete transcript from this meeting is included in the Appendix.

D. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process was held March 19, 2020 through April 20, 2020. It concluded with a public hearing being held April 21, 2020. Comments from this meeting will be summarized below.

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Section III. Assessment of Past Goals and Actions

An Analysis of Impediments to Fair Housing Choice (AI) for the City of Carson was last completed in 2015. (HUD directed the City to revise that AI to correct deficiencies in that report, and that revision was completed in 2017.) The conclusions drawn from this report are outlined in the following narrative.

A. PAST IMPEDIMENTS AND ACTIONS

A summary of the conclusions of the 2015 Analysis of Impediments is included below:

Impediment #1: POTENTIAL REAL ESTATE STEERING PRACTICES (Consolidates and Addresses Prior Impediments)

Impediment #2: REAL ESTATE LENDING PRACTICES (Consolidates and Addresses Prior Impediments)

Impediment #3: AMENDMENTS TO THE CARSON MUNICIPAL CODE (Consolidates and Addresses Prior Impediments)

Impediment #4: HOUSING CONDITIONS AND HOUSING STOCK

Impediment #5: AFFORDABLE HOUSING OPPORTUNITY FOR FRAIL ELDERLY AND DISABLED

Impediment #6: DISPROPORTIONATE COST BURDEN AFFECTING ASIAN AND HISPANIC ETHNIC GROUPS

Impediment #7: DISCRIMINATION IN MOBILEHOME PARKS (Consolidates and Addresses Prior Impediments)

Impediment #8: OUTREACH AND PROMOTION OF FAIR HOUSING SERVICES (Consolidates and Addresses Prior Impediments)

FAIR HOUSING ACTIVITIES

The City has undertaken a variety of efforts to overcome the effects of impediments identified in the last Analysis of Impediments. These include:

- Monitoring all housing built prior to 1980 for lead-based paint and other hazardous or structurally unsafe housing issues (for example, the presence of asbestos).
- Monitoring low- to moderate-income housing developments that have existing affordability controls that comprise the inventory of assisted housing units for their risk of conversion to market rate (two such developments have been identified as being at risk for conversion by 2021, and an additional two at risk of conversion between 2021 and 2024).
- Continuing the ongoing effort to combat the incidence of blighted and otherwise substandard housing through a combination of efforts including enforcement, citation, and referral to the City's housing rehabilitation programs. (The City's Code Enforcement Division responds to approximately 2,000 complaints annually).

- Continuing, through the Carson Housing Authority, providing development assistance (in the form of direct financial subsidies to developers, provision of infrastructure, and/or the writing down of land costs) in order to promote the development of affordable multi-family housing.
- Encouraging the development of mixed-use projects in the city, including the development of specific plans that require housing as a key component of the proposed development.
- Continuing, through the Carson Housing Authority, providing development assistance (in the form of direct financial subsidies to developers, provision of infrastructure, and/or the writing down of land costs) in order to promote the development of affordable multi-family housing.
- Increasing the knowledge throughout the community of the availability of fair housing services. The City currently provides a link to the fair housing provider (the Housing Rights Center) on its website and uses the City website to advertise HRC's services. The City also distributes flyers and other written materials at City Hall and at the Congresswoman Juanita Millender-McDonald Community Center regarding HRC's services and the Walk-In Clinics. Written materials regarding HRC's services (flyers, brochures, website announcements) are currently distributed in both English and Spanish.
- Repeal of the City's Residential Property Report (RPR) ordinance. Under that ordinance, approval of transfers of residential property within the city were contingent on a report that included an inspection of the property. That ordinance included an exception for spousal transfers, which the previous AI noted could be viewed as a violation of the California Fair Housing and Employment Act prohibition against differential treatment based on marital status. City Council voted to repeal the entire Residential Property Report ordinance on August 6, 2019, and the repeal became effective on September 20, 2019.

Section IV. Fair Housing Analysis

This section presents demographic, economic, and housing information that is drawn from the 2010 Census and American Community Survey (ACS) estimates unless otherwise noted. This analysis uses ACS Data to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the City of Carson.

Lead Agency and Service Area

The City of Carson is the lead agency undertaking this Analysis of Impediments to Fair Housing Choice.

A. SOCIO-ECONOMIC OVERVIEW

DEMOGRAPHICS

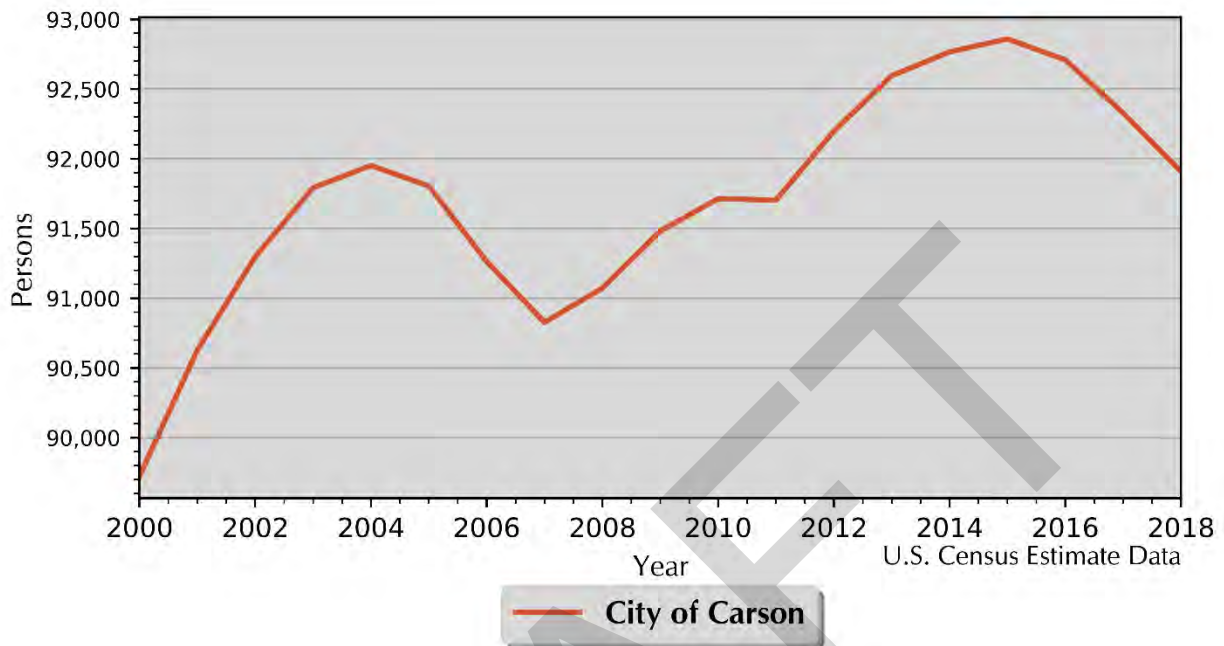
Table IV.1, at right, shows the population for the City of Carson. As can be seen, the population in City of Carson increased from 91,714 persons in 2010 to 91,909 persons in 2018, or by 0.2 percent.

Census Demographic Data

In the 1980, 1990, and 2000 decennial censuses, the Census Bureau released several tabulations in addition to the full SF1 100 percent count data, including the one-in-six SF3 sample. These additional samples, such as the SF3, asked supplementary questions regarding income and household attributes that were not asked in the 2010 Census. To study these important concepts, the Census Bureau distributes the American Community Survey every year to a sample of the population and quantifies the results as one-, three-, and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-year estimates include more responses, the estimates can be tabulated down to the Census tract level, and considered more robust than the one or three year sample estimates.

Table IV.1 Population Estimates City of Carson Census Population Estimates		
Year	Population	Percent Yearly Change
2000	89,723	.
2001	90,627	1.0%
2002	91,297	0.7%
2003	91,792	0.5%
2004	91,952	0.2%
2005	91,805	-0.2%
2006	91,264	-0.6%
2007	90,827	-0.5%
2008	91,072	0.3%
2009	91,482	0.5%
2010	91,714	0.3%
2011	91,704	-0.0%
2012	92,199	0.5%
2013	92,596	0.4%
2014	92,767	0.2%
2015	92,860	0.1%
2016	92,710	-0.2%
2017	92,329	-0.4%
2018	91,909	-0.5%

Diagram IV.1
Population
City of Carson
2000 – 2018 Census Estimate Data



Population Estimates

Population by race and ethnicity through 2017 is shown in Table IV.2. In 2017, white residents represented 28.8 percent of the population, compared with black residents accounting for 23.2 percent of the population. Hispanic residents represented 37.9 percent of the population in 2017.

Table IV.2 Population by Race and Ethnicity City of Carson 2010 Census & 2017 Five-Year ACS				
Race	2010 Census		2017 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	21,864	23.8%	26,776	28.8%
Black	21,856	23.8%	21,553	23.2%
American Indian	518	0.6%	700	0.8%
Asian	23,522	25.6%	24,877	26.8%
Native Hawaiian/ Pacific Islander	2,386	2.6%	1,918	2.1%
Other	17,151	18.7%	12,120	13.0%
Two or More Races	4,417	4.8%	4,983	5.4%
Total	91,714	100.0%	92,927	100.0%
Non-Hispanic	56,297	61.4%	57,707	62.1%
Hispanic	35,417	38.6%	35,220	37.9%

The change in race and ethnicity between 2010 and 2017 is shown in Table IV.3. During this time, the total non-Hispanic population was 57,707 persons in 2017, while the Hispanic population was 35,220.

Table IV.3 Population by Race and Ethnicity City of Carson 2010 Census & 2017 Five-Year ACS				
Race	2010 Census		2017 Five-Year ACS	
	Population	% of Total	Population	% of Total
Non-Hispanic				
White	7,022	12.5%	6,756	11.7%
Black	21,385	38.0%	21,145	36.6%
American Indian	152	0.3%	155	0.3%
Asian	23,105	41.0%	24,549	42.5%
Native Hawaiian/Pacific Islander	2,291	4.1%	1,891	3.3%
Other	226	0.4%	177	0.3%
Two or More Races	2,116	3.8%	3,034	5.3%
Total Non-Hispanic	56,297	100.0%	57,707	100.0%
Hispanic				
White	14,842	41.9%	20,020	56.8%
Black	471	1.3%	408	1.2%
American Indian	366	1.0%	545	1.5%
Asian	417	1.2%	328	0.9%
Native Hawaiian/Pacific Islander	95	0.3%	27	0.1%
Other	16,925	47.8%	11,943	33.9%
Two or More Races	2,301	6.5%	1,949	5.5%
Total Hispanic	35,417	100.0	35,220	100.0%
Total Population	91,714	100.0%	92,927	100.0%

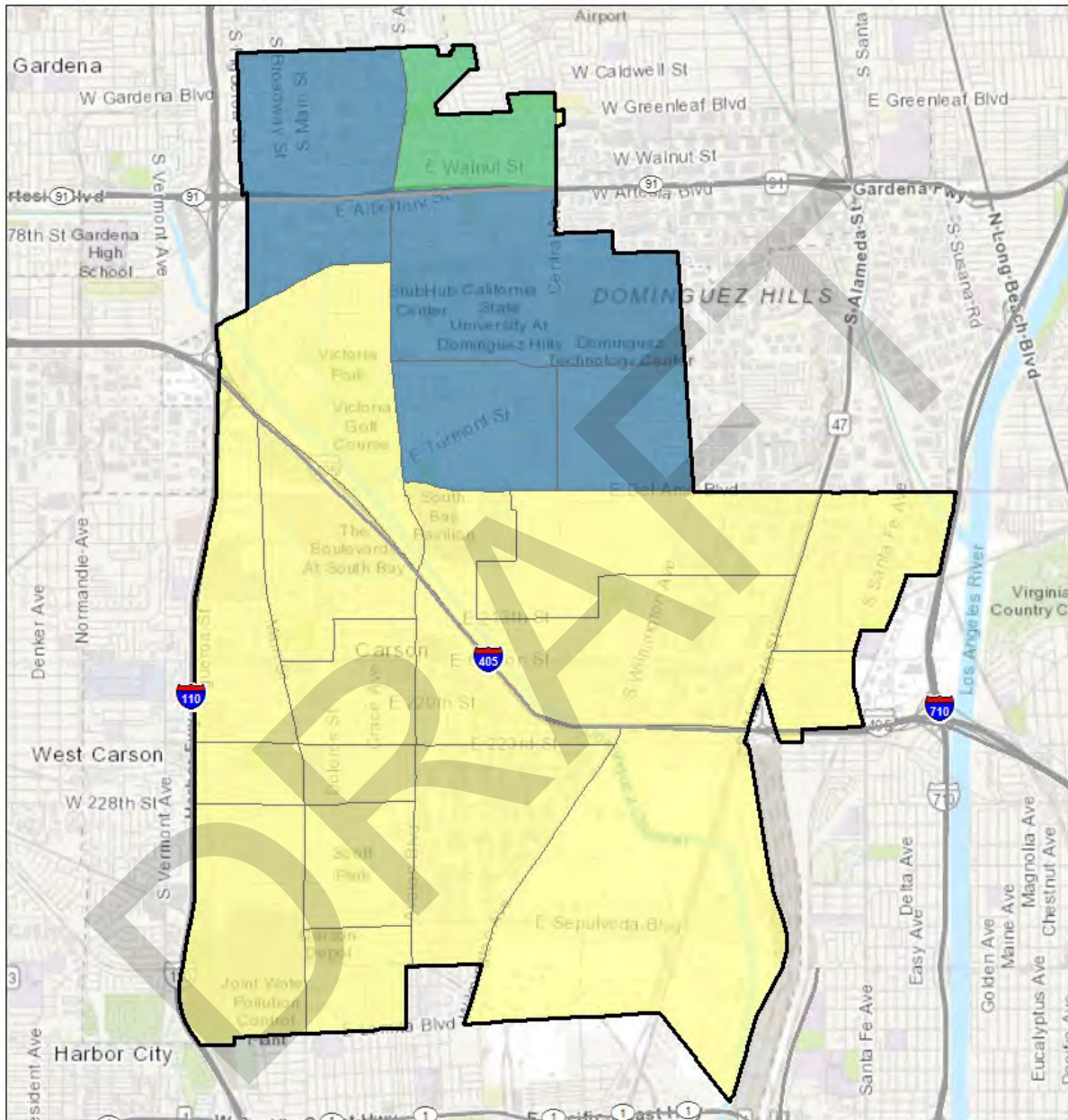
The geographic distribution of black residents is shown in Map IV.1. There are areas in the City that saw a disproportionate share of black residents in 2017. A disproportionate share exists when any one area has a concentration of a particular racial or ethnic group at least ten percentage points higher than the jurisdiction's average. The areas in the City with a disproportionate share of black residents were in the northern part of the City. The City also saw areas with a disproportionate share of Hispanic residents, mainly in the southern and western part of the City.

The group quarters population was 1,303 in 2010, compared to 1,210 in 2000. Institutionalized populations experienced a -45.0 percent change between 2000 and 2010. Non-Institutionalized populations experienced a 20.9 percent change during this same time period.

Table IV.4 Group Quarters Population City of Carson 2000 & 2010 Census SF1 Data					
Group Quarters Type	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	0	0%	13	9.8%	inf%
Juvenile Facilities	.	.	67	50.4%	.
Nursing Homes	236	97.5%	49	36.8%	-79.2%
Other Institutions	6	2.5%	4	3.0%	-33.3%
Total	242	100.0%	133	100.0%	-45.0%
Non-Institutionalized					
College Dormitories	451	46.6%	571	48.8%	26.6%
Military Quarters	0	0%	0	0%	0%
Other Non-Institutionalized	517	53.4%	599	51.2%	15.9%
Total	968	100.0%	1,170	100.0%	20.9%

Group Quarters Population	1,210	100.0%	1,303	100.0%	7.7%
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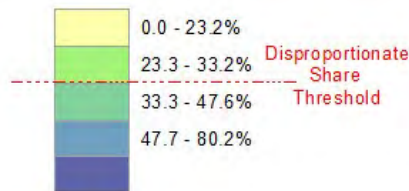
Map IV.1
Black Population
 City of Carson
 2017 ACS, Tiglerline



LEGEND

2013-2017 Black Population

Average Percent Black in
 Study Area Tracts = 23.2%
 Disproportionate
 Share Threshold = 33.2%

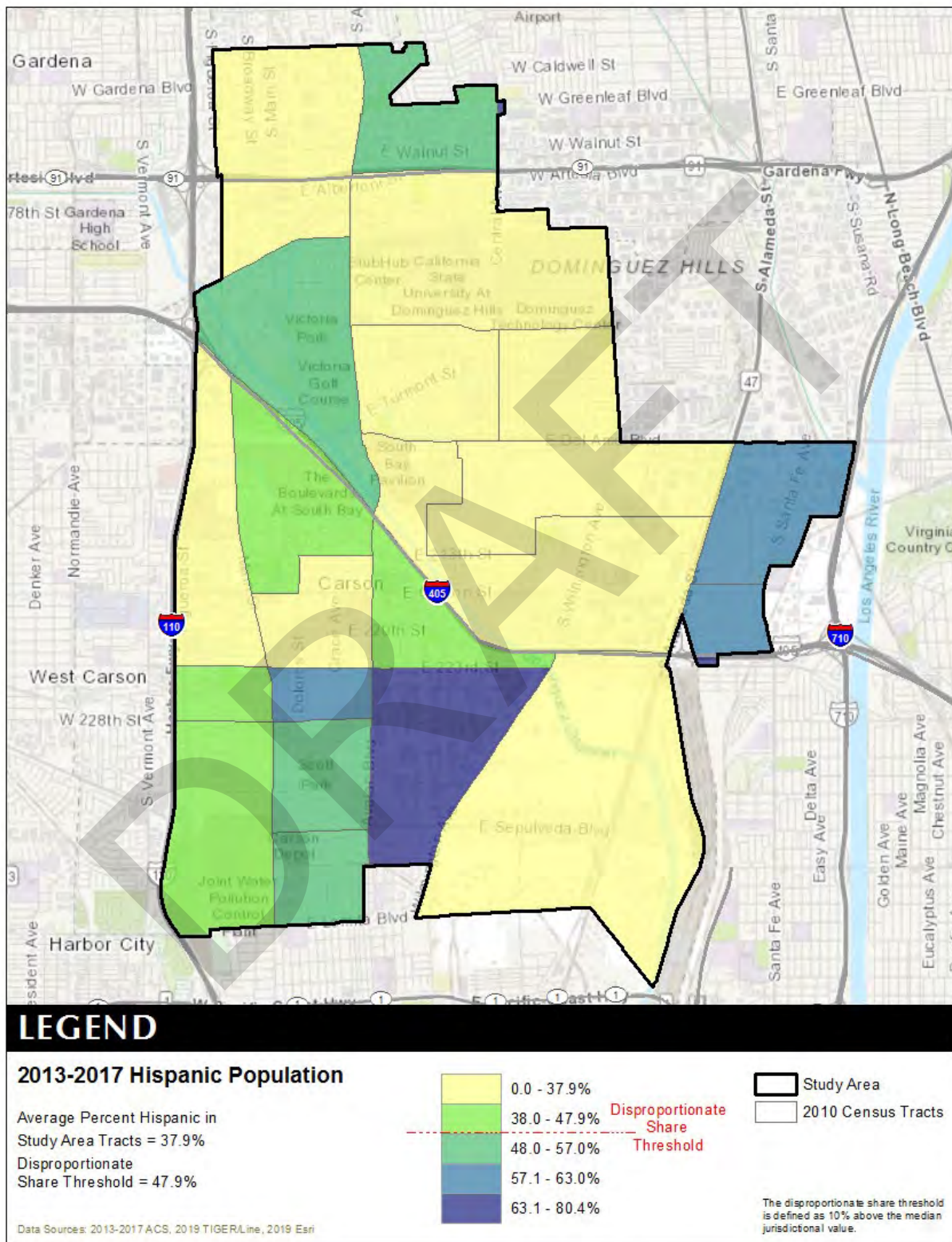


Study Area
 2010 Census Tracts

The disproportionate share threshold
 is defined as 10% above the median
 jurisdictional value.

Data Sources: 2013-2017 ACS, 2019 TIGERLine, 2019 Esri

Map IV.2
Hispanic Population
 City of Carson
 2017 ACS, Tiglerline



Limited English Proficiency

Under Title VI of the Civil Rights Act of 1964 and in accordance with Supreme Court precedent in *Lau v. Nichols*, recipients of federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities by persons of limited English proficiency (LEP).⁷ In the context of HUD's assessment of access to housing, LEP refers to a person's limited ability to read, write, speak, or understand English.⁸

The number of foreign born persons is shown in Table IV.5. An estimated 16.1 percent of the population was born in Philippines, some 11.7 percent was born in Mexico, and another 0.7 percent was born in Nigeria.

Table IV.5 Place of Birth for the Foreign-Born Population City of Carson 2017 Five-Year ACS			
Number	Country	Number of Persons	Percent of Total Population
#1 country of origin	Philippines	14,946	16.1%
#2 country of origin	Mexico	10,853	11.7%
#3 country of origin	Nigeria	660	0.7%
#4 country of origin	El Salvador	620	0.7%
#5 country of origin	Korea	604	0.6%
#6 country of origin	Guatemala	581	0.6%
#7 country of origin	Peru	339	0.4%
#8 country of origin	Vietnam	312	0.3%
#9 country of origin	Belize	276	0.3%
#10 country of origin	Honduras	220	0.2%

Limited English Proficiency and the language spoken at home are shown in Table IV.6. An estimated 12.2 percent of the population speaks Spanish at home, followed by 7.4 percent speaking Tagalog.

⁷ https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_o

⁸ <https://www.hud.gov/sites/documents/LEPMEMO091516.PDF>

Table IV.6 Limited English Proficiency and Language Spoken at Home City of Carson 2017 Five-Year ACS			
Number	Country	Number of Persons	Percent of Total Population
#1 LEP Language	Spanish	10,654	12.2%
#2 LEP Language	Tagalog	6,448	7.4%
#3 LEP Language	Other Asian and Pacific Island languages	865	1.0%
#4 LEP Language	Korean	450	0.5%
#5 LEP Language	Other and unspecified languages	269	0.3%
#6 LEP Language	Chinese	168	0.2%
#7 LEP Language	Vietnamese	142	0.2%
#8 LEP Language	Other Indo-European languages	129	0.1%
#9 LEP Language	Arabic	99	0.1%
#10 LEP Language	Russian, Polish, or other Slavic languages	25	0%

Education

Education and employment data, as estimated by the 2017 ACS, is presented in Table IV.7. In 2017, some 43,755 persons were employed and 4,363 were unemployed. This totaled a labor force of 48,118 persons. The unemployment rate for the City of Carson was estimated to be 9.1 percent in 2017.

Table IV.7 Employment, Labor Force and Unemployment City of Carson 2017 Five-Year ACS Data	
Employment Status	2017 Five-Year ACS
Employed	43,755
Unemployed	4,363
Labor Force	48,118
Unemployment Rate	9.1%

In 2017, 82.0 percent of households in City of Carson had a high school education or greater.

Table IV.8 High School or Greater Education City of Carson 2017 Five-Year ACS Data	
Education Level	Households
High School or Greater	20,814
Total Households	25,381
Percent High School or Above	82.0%

As seen in Table IV.9, some 23.2 percent of the population had a high school diploma or equivalent, another 34.7 percent have some college, 17.4 percent have a bachelor's degree, and 6.1 percent of the population had a graduate or professional degree.

Table IV.9 Educational Attainment City of Carson 2017 Five-Year ACS Data		
Education Level	Population	Percent
Less Than High School	13,575	18.5%
High School or Equivalent	17,004	23.2%
Some College or Associates Degree	25,385	34.7%
Bachelor's Degree	12,738	17.4%
Graduate or Professional Degree	4,487	6.1%
Total Population Above 18 years	73,189	100.0%

Summary

The population and the racial and ethnic makeup of the City of Carson are not changing significantly. Limited English Proficiency data indicates that an estimated 12.2 percent of the population speaks Spanish at home, followed by 7.4 percent speaking Tagalog. In 2017, some 23.2 percent of the population had a high school diploma or equivalent, another 34.7 percent had some college, 17.4 percent had a bachelor's degree, and 6.1 percent of the population had a graduate or professional degree.

ECONOMICS

The following section describes the economic context for the City of Carson. The data presented here is from the Bureau of Economic Analysis (BEA) and the Bureau of Labor Statistics (BLS). The data from the BEA is only available at the County level only and shows the entirety of Los Angeles County. The BLS data presented below is specific to the City of Carson.

Labor Force

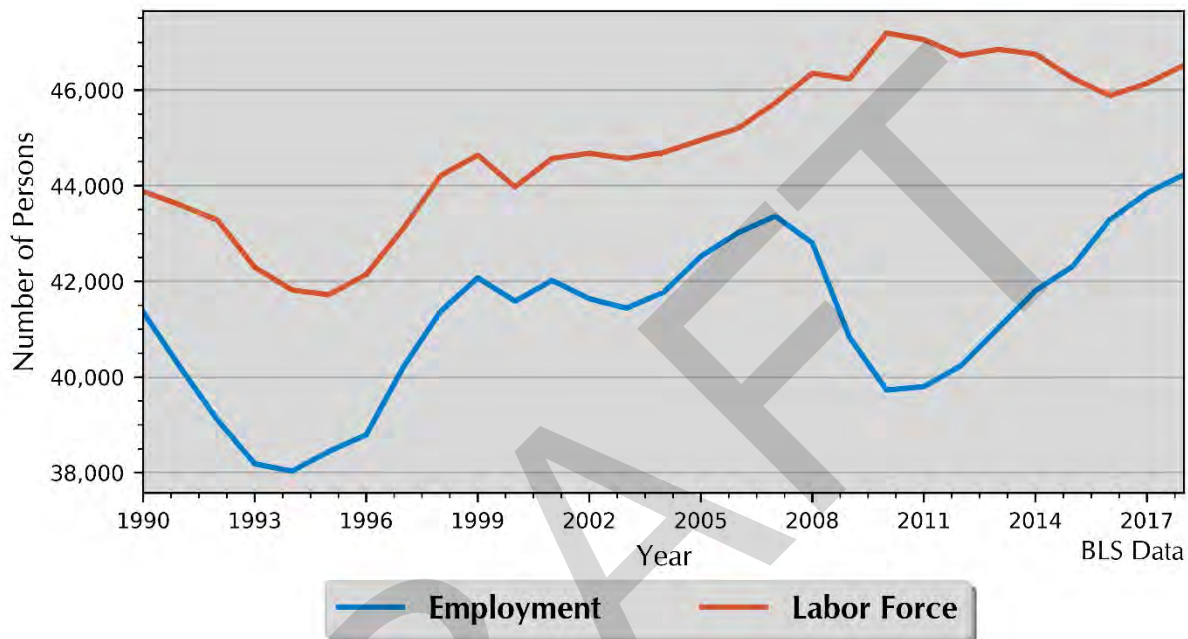
Table IV.10 shows the labor force statistics for City of Carson from 1990 to 2018. Over the entire series the lowest unemployment rate occurred in 2006 with a rate of 4.8 percent. The highest level of unemployment occurred during 2010, rising to a rate of 15.8 percent. This compared to a statewide low of 4.2 percent in 2018 and statewide high of 12.2 percent in 2010. Over the last year measured, the unemployment rate in City of Carson decreased from 5.0 percent in 2017 to 4.9 percent in 2018, which compared to a statewide decrease to 4.2 percent.

Year	City of Carson				Statewide Unemployment Rate
	Unemployment	Employment	Labor Force	Unemployment Rate	
2000	2,388	41,588	43,976	5.4%	4.9%
2001	2,551	42,020	44,571	5.7%	5.4%
2002	3,041	41,638	44,679	6.8%	6.7%
2003	3,126	41,441	44,567	7.0%	6.8%
2004	2,923	41,774	44,697	6.5%	6.2%
2005	2,432	42,524	44,956	5.4%	5.4%
2006	2,184	43,016	45,200	4.8%	4.9%
2007	2,365	43,366	45,731	5.2%	5.4%
2008	3,546	42,805	46,351	7.7%	7.3%
2009	5,402	40,832	46,234	11.7%	11.2%
2010	7,463	39,729	47,192	15.8%	12.2%
2011	7,256	39,800	47,056	15.4%	11.7%
2012	6,482	40,239	46,721	13.9%	10.4%
2013	5,826	41,025	46,851	12.4%	8.9%
2014	4,944	41,808	46,752	10.6%	7.5%
2015	3,938	42,312	46,250	8.5%	6.2%
2016	2,592	43,288	45,880	5.6%	5.5%
2017	2,293	43,847	46,140	5.0%	4.8%
2018	2,286	44,232	46,518	4.9%	4.2%

Diagram IV.2 shows the employment and labor force for City of Carson. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 43,847 persons, with the labor force reaching 46,140, indicating there were a total of 2,293 unemployed persons.

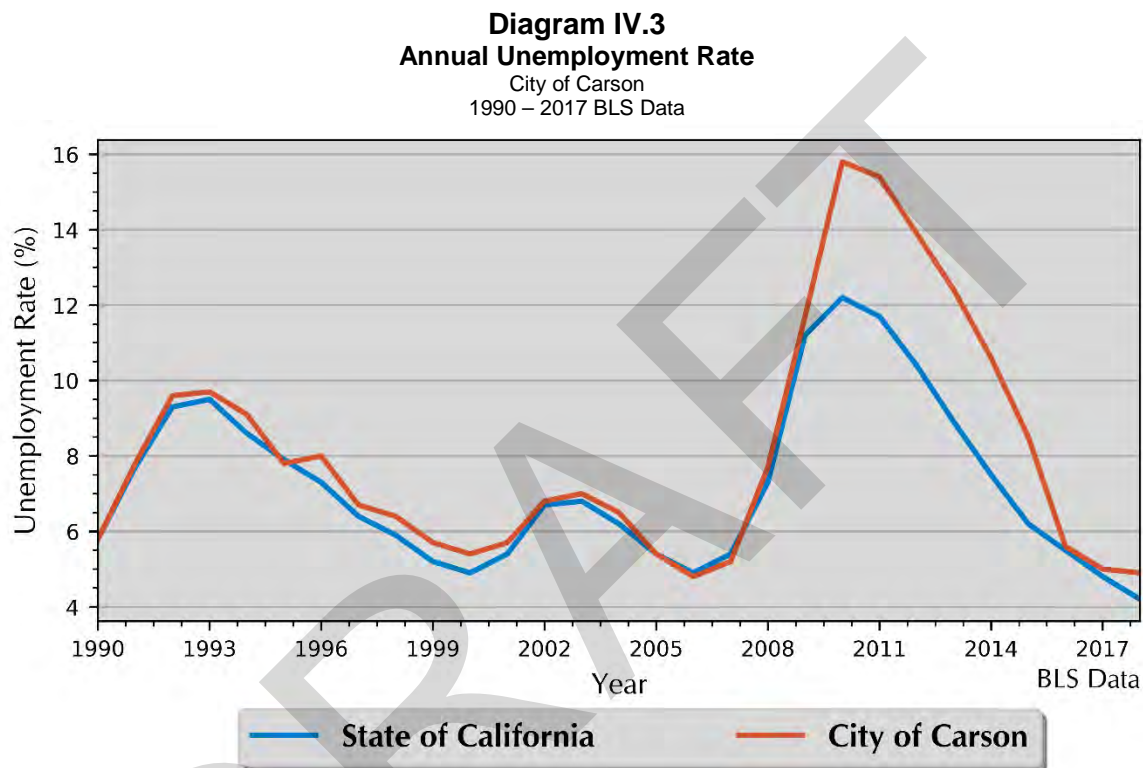
Diagram IV.2
Employment and Labor Force

City of Carson
1990 – 2017 BLS Data



Unemployment

Diagram IV.3 shows the unemployment rate for both the State of California and City of Carson. During the 1990s the average rate for the city was 7.6 percent, which compared to 7.3 percent statewide. Between 2000 and 2010, the city unemployment rate had an average of 6.6 percent, which compared to 6.4 percent statewide. Since 2010, the average unemployment rate was 10.3 percent. Over the course of the entire period the city had an average unemployment rate higher than the State; 8.1 percent for the city versus 7.2 percent statewide.



Earnings: Los Angeles County

The Bureau of Economic Analysis (BEA) produces regional economic accounts, which provide a consistent framework for analyzing and comparing individual state and local area economies. Diagram IV.4 shows real average earnings per job for Los Angeles County from 1990 to 2017. Over this period, the average earning per job for Los Angeles County was \$64,072, which was higher than the statewide average of \$63,704 over the same period.

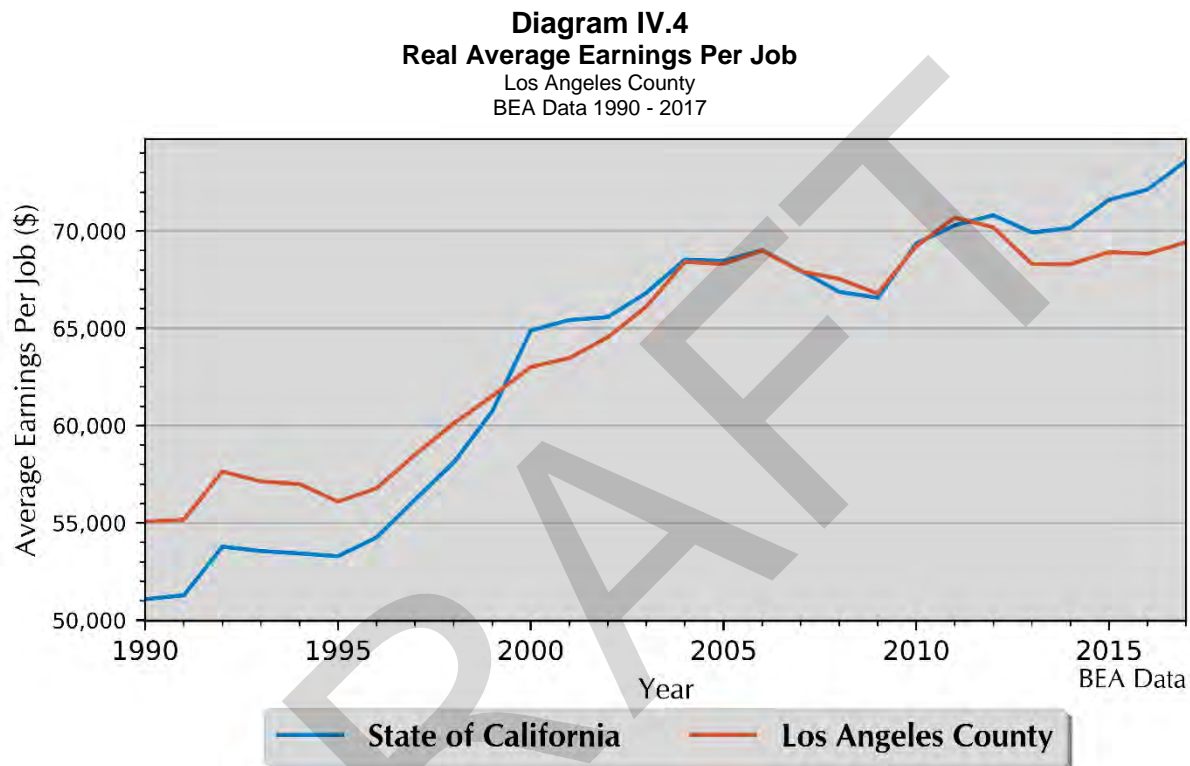
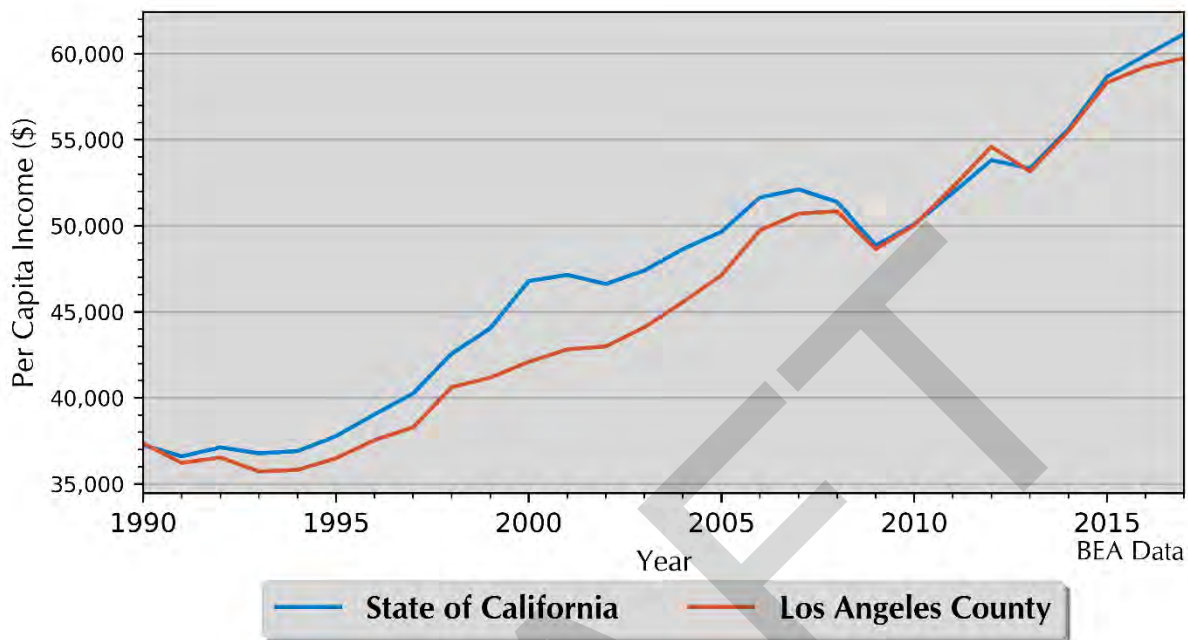


Diagram IV.5 shows real per capita income (which is calculated by dividing total personal income from all sources by population) for Los Angeles County from 1990 to 2017. Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Over this period, the real per capita income for Los Angeles County was \$45,830, which was lower than the statewide average of \$47,254 over the same period.

Diagram IV.5
Real Per Capita Income
 Los Angeles County
 BEA Data 1990 - 2017



Poverty

The rate of poverty for City of Carson is shown in Table IV.11. In 2017, there were an estimated 9,759 persons living in poverty. This represented a 10.6 percent poverty rate, compared to 9.3 percent poverty in 2000. In 2017, some 10.5 percent of those in poverty were under age 6, and 12.8 percent were 65 or older.

Age	2000 Census		2017 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	798	9.7%	1,020	10.5%
6 to 17	1,953	23.8%	2,080	21.3%
18 to 64	4,674	56.9%	5,409	55.4%
65 or Older	791	9.6%	1,250	12.8%
Total	8,216	100.0%	9,759	100.0%
Poverty Rate	9.3%	.	10.6%	.

Summary

In 2018, unemployment in the City of Carson was at 4.9 percent, compared to 4.1 percent for the State of California. This is representative of a labor force of 46,518 people and 44,232 people employed. Real per capita income in Los Angeles County has remained steady with the state rate in recent years. However, poverty has grown to 12.8 percent in the City of Carson, representing 9,759 persons living in poverty in the City.

HOUSING

Housing Production

The Census Bureau reports building permit authorizations and “per unit” valuation of building permits by city annually. Single-family construction usually represents most residential development in the city. Single-family building permit authorizations in the City of Carson decreased from 20 authorizations in 2017 to 4 in 2018.

The real value of single-family building permits decreased from \$313,596 in 2017 to \$123,750 in 2018. This compares to a decrease in permit value statewide, with values decreasing from \$308,350 in 2017 to \$303,302 in 2018. Additional details are given in Table IV.12.

Table IV.12
Building Permits and Valuation
City of Carson
Census Bureau Data, 1980–2018

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017\$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	68	0	3	110	181	151,052	123,973
1981	5	0	4	112	121	183,683	142,390
1982	5	2	0	43	50	144,758	150,178
1983	32	0	0	55	87	136,272	121,266
1984	28	0	0	114	142	149,059	138,501
1985	15	2	16	62	95	189,186	127,731
1986	20	4	36	21	81	167,613	125,681
1987	15	6	34	148	203	174,084	118,543
1988	38	6	16	66	126	165,876	107,361
1989	55	12	0	0	67	210,137	0
1990	133	2	0	0	135	201,267	0
1991	44	4	0	0	48	197,472	0
1992	39	0	3	94	136	234,616	109,226
1993	3	0	0	0	3	230,088	0
1994	11	0	0	92	103	193,261	85,225
1995	10	0	0	85	95	184,177	83,471
1996	10	0	0	101	111	182,375	81,972
1997	11	0	0	106	117	178,888	80,587
1998	8	0	0	74	82	244,173	80,526
1999	8	0	0	77	85	215,811	79,117
2000	158	0	0	5	163	170,966	77,394
2001	139	0	0	5	144	169,012	75,724
2002	154	0	0	10	164	165,966	74,548
2003	69	0	0	10	79	163,182	73,193
2004	0	0	0	0	0	0	0
2005	0	0	0	0	0	0	0
2006	0	0	0	0	0	0	0
2007	0	0	0	0	0	0	0
2008	0	0	0	0	0	0	0
2009	0	0	0	0	0	0	0
2010	0	0	0	0	0	0	0
2011	0	0	0	0	0	0	0
2012	0	0	0	0	0	0	0
2013	4	0	0	40	44	260,428	184,422
2014	28	0	0	0	28	450,850	0
2015	29	0	0	10	39	450,506	96,914
2016	9	0	0	9	18	227,305	251,120
2017	20	2	0	0	22	313,596	0
2018	4	0	0	149	153	123,750	58,389

Diagram IV.6
Single-Family Permits

City of Carson
Census Bureau Data, 1980–2017

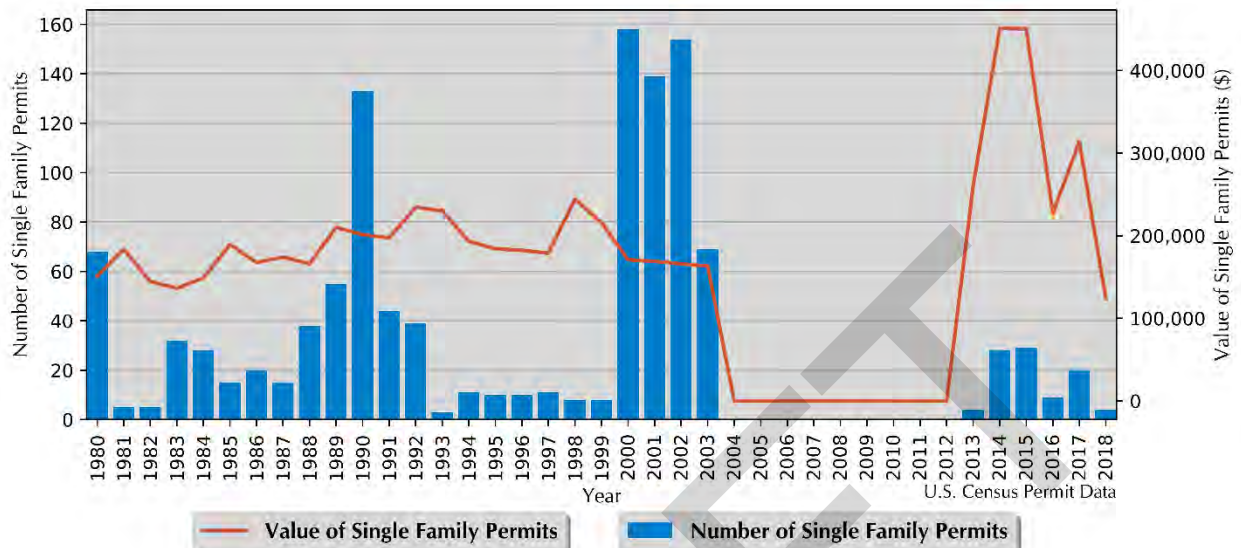
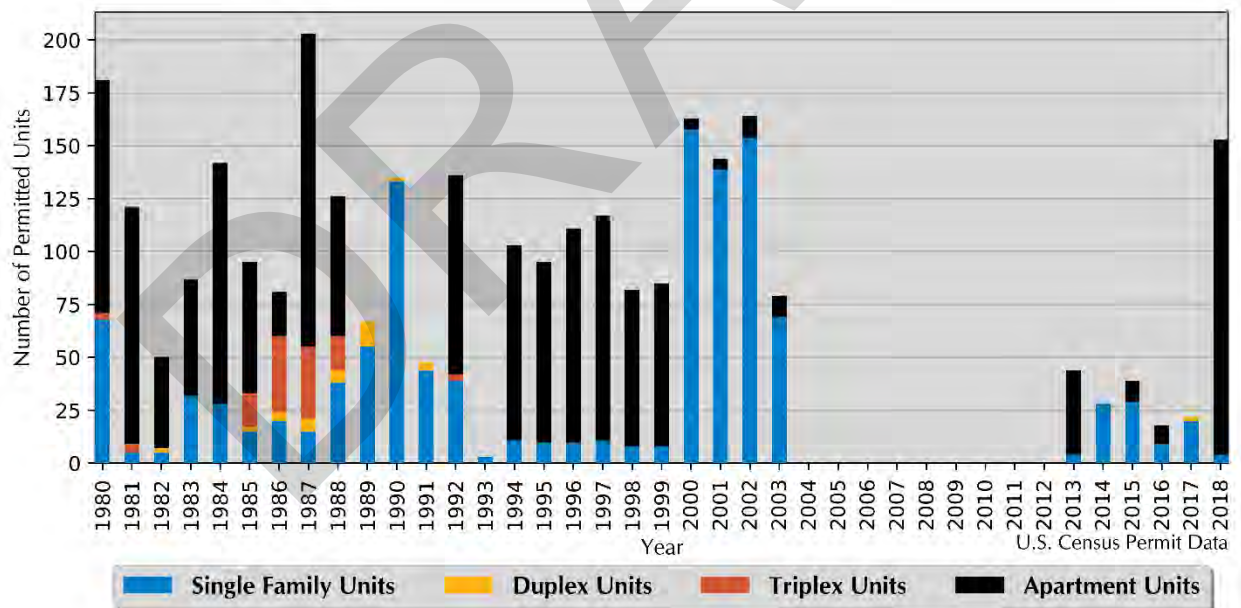


Diagram IV.7
Total Permits by Unit Type

City of Carson
Census Bureau Data, 1980–2017



Housing Characteristics

Households by type and tenure are shown in Table IV.13. Family households represented 80.1 percent of households, while non-family households accounted for 19.9 percent. These changed from family households being 81.5 percent and non-family households 18.5 percent, respectively, in 2010.

Table IV.13 Household Type by Tenure City of Carson 2010 Census SF1 & 2017 Five-Year ACS Data				
Household Type	2010 Census		2017 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	20,726	81.5%	20,342	80.1%
Married Couple Family	14,178	68.4%	13,439	66.1%
Owner-Occupied	11,513	81.2%	10,556	78.5%
Renter-Occupied	2,665	18.8%	2,883	21.5%
Other Family	6,548	31.6%	6,903	32.2%
Male Householder, No Spouse	1,761	26.9%	1,820	25.5%
Present				
Owner-Occupied	1,259	71.5%	1,191	65.4%
Renter-Occupied	502	28.5%	629	34.6%
Female Householder, No Spouse	4,787	73.1%	5,083	69.3%
Present				
Owner-Occupied	3,365	70.3%	3,422	67.3%
Renter-Occupied	1,422	29.7%	1,661	32.7%
Non-Family Households	4,706	18.5%	5,039	19.9%
Owner-Occupied	3,392	72.1%	3,747	74.4%
Renter-Occupied	1,314	27.9%	1,292	25.6%
Total	25,432	100.0%	25,381	100.0%

Table IV.14 shows housing units by type in 2010 and 2017. In 2010, there were 25,705 housing units, compared with 26,119 in 2017. Single-family units accounted for 77.5 percent of units in 2017, compared to 79.8 in 2010. Apartment units accounted for 10.4 percent in 2017, compared to 8.3 percent in 2010.

Table IV.14 Housing Units by Type City of Carson 2010 & 2017 Five-Year ACS Data				
Unit Type	2010 Five-Year ACS		2017 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	20,503	79.8%	20,243	77.5%
Duplex	217	0.8%	130	0.5%
Tri- or Four-Plex	457	1.8%	629	2.4%
Apartment	2,121	8.3%	2,728	10.4%
Mobile Home	2,378	9.3%	2,370	9.1%
Boat, RV, Van, Etc.	29	0.1%	19	0.1%
Total	25,705	100.0%	26,119	100.0%

Table IV.15 shows housing units by tenure from 2010 to 2017. By 2017, there were 26,119 housing units. An estimated 74.5 percent were owner-occupied, and 2.8 percent were vacant.

Table IV.15 Housing Units by Tenure City of Carson 2010 Census & 2017 Five-Year ACS Data				
Tenure	2010 Census		2017 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	25,432	97.0%	25,381	97.2%
Owner-Occupied	19,529	76.8%	18,916	74.5%
Renter-Occupied	5,903	23.2%	6,465	25.5%
Vacant Housing Units	794	3.0%	738	2.8%
Total Housing Units	26,226	100.0%	26,119	100.0%

Households by income for the 2010 and 2017 5-year ACS are shown in Table IV.16. Households earning more than \$100,000 per year represented 35.1 percent of households in 2017, compared to 29.8 percent in 2010. Meanwhile, households earning less than \$15,000 accounted for 7.1 percent of households in 2017, compared to 6.6 percent in 2010.

Table IV.16 Households by Income City of Carson 2010 & 2017 Five-Year ACS Data				
Income	2010 Five-Year ACS		2017 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	1,642	6.6%	1,807	7.1%
\$15,000 to \$19,999	1,087	4.4%	731	2.9%
\$20,000 to \$24,999	780	3.1%	1,228	4.8%
\$25,000 to \$34,999	2,092	8.4%	1,422	5.6%
\$35,000 to \$49,999	3,026	12.2%	2,921	11.5%
\$50,000 to \$74,999	5,065	20.3%	4,492	17.7%
\$75,000 to \$99,999	3,790	15.2%	3,866	15.2%
\$100,000 or More	7,421	29.8%	8,914	35.1%
Total	24,903	100.0%	25,381	100.0%

Table IV.17 shows households by year home built for the 2010 and 2017 5-year ACS data. Housing units built between 2000 and 2009, account for 5.1 percent of households in 2010 and 4.8 percent of households in 2017. Housing units built in 1939 or earlier represented 3.5 percent of households in 2017 and 2.7 percent of households in 2010.

Table IV.17 Households by Year Home Built City of Carson 2010 & 2017 Five-Year ACS Data				
Year Built	2010 Five-Year ACS		2017 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	666	2.7%	897	3.5%
1940 to 1949	2,430	9.8%	1,847	7.3%
1950 to 1959	5,530	22.2%	5,447	21.5%
1960 to 1969	7,847	31.5%	8,447	33.3%
1970 to 1979	4,009	16.1%	3,787	14.9%
1980 to 1989	2,046	8.2%	2,264	8.9%
1990 to 1999	1,106	4.4%	1,002	3.9%
2000 to 2009	1,269	5.1%	1,216	4.8%
2010 or Later	.	.	474	1.9%
Total	24,903	100.0%	25,381	100.0%

The distribution of unit types by race is shown in Table IV.18. An estimated 74.2 percent of white households occupy single-family homes, while 82.3 percent of black households do. Some 7.8 percent of white households occupied apartments, while 11.6 percent of black households do. An estimated 78.9 percent of Asian, and 100.0 percent of American Indian households, occupy single-family homes.

Table IV.18 Distribution of Units in Structure by Race City of Carson 2017 Five-Year ACS Data							
Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	74.2%	82.3%	100.0%	78.9%	73.1%	71.8%	81.5%
Duplex	0.8%	0%	0%	0.4%	0%	1.5%	0%
Tri- or Four-Plex	1.4%	1.9%	0%	3.4%	0%	4.7%	4.0%
Apartment	7.8%	11.6%	0%	12.0%	23.9%	11.4%	6.3%
Mobile Home	15.7%	4.0%	0%	5.2%	3.0%	10.7%	8.2%
Boat, RV, Van, Etc.	0%	0.3%	0%	0%	0%	0%	0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The disposition of vacant units between 2010 and 2017 is shown in Table IV.19. By 2017, for rent units accounted for 13.0 percent of vacant units, while for sale units accounted for 12.7 percent. “Other” vacant units accounted for 45.1 percent of vacant units, representing a total of 333 “other” vacant units.

Table IV.19 Disposition of Vacant Housing Units City of Carson 2010 Census & 2017 Five-Year ACS Data				
Disposition	2010 Census		2017 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	227	28.6%	96	13.0%
For Sale	256	32.2%	94	12.7%
Rented Not Occupied	19	2.4%	54	7.3%
Sold Not Occupied	57	7.2%	65	8.8%
For Seasonal, Recreational, or Occasional Use	42	5.3%	96	13.0%
For Migrant Workers	0	0%	0	0%
Other Vacant	193	24.3%	333	45.1%
Total	794	100.0%	738	100.0%

The age of a structure influences its value. As shown in Table IV.20, structures built in 1939 or earlier had a median value of \$419,400, while structures built between 1950 and 1959 had a median value of \$400,300 and those built between 1990 and 1999 had a median value of \$426,200. The newest structures tended to have the highest values and those built between 2010 and 2013 had median values of \$546,600. The total median value in City of Carson was \$402,500.

Table IV.20 Owner Occupied Median Value by Year Structure Built City of Carson 2017 5-Year ACS Data	
Year Structure Built	Median Value
1939 or earlier	\$419,400
1940 to 1949	\$372,500
1950 to 1959	\$400,300
1960 to 1969	\$430,200
1970 to 1979	\$269,300
1980 to 1989	\$328,800
1990 to 1999	\$426,200
2000 to 2009	\$420,100
2010 to 2013	\$546,600
2014 or later	0
Median Value	\$402,500

Summary

The City experienced a dropoff in housing production during the recent recession. That dropoff has begun to recover somewhat. In 2018, there were 153 total units produced in the City, with 149 of these being multifamily units. Single-family unit production declined beginning in 2004, and has increased slightly since that time. The value of single-family permits, however, has continued to rise until 2015, reaching \$450,506 before dropping off to \$123,750 in 2018. Since 2010, the City has seen a decline in the proportion of vacant units to 2.8 percent, but has experienced a rise in the proportion of “other” vacant units.

B. SEGREGATION AND INTEGRATION

The “dissimilarity index” provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast, and again, using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

A Technical Note on the Dissimilarity Index Methodology

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes a geographic unit, j is the j th jurisdiction, W is group one and B is group two, and N is the number of geographic units, starting with i , in jurisdiction j .⁹

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD’s methodology for calculating the index of dissimilarity.

The principal exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD used tract level data in 1990 and 2000, HUD used block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.¹⁰

As a general rule, HUD considers the thresholds appearing in the table below to indicate low, moderate, and high levels of segregation:

Interpreting the dissimilarity index		
Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

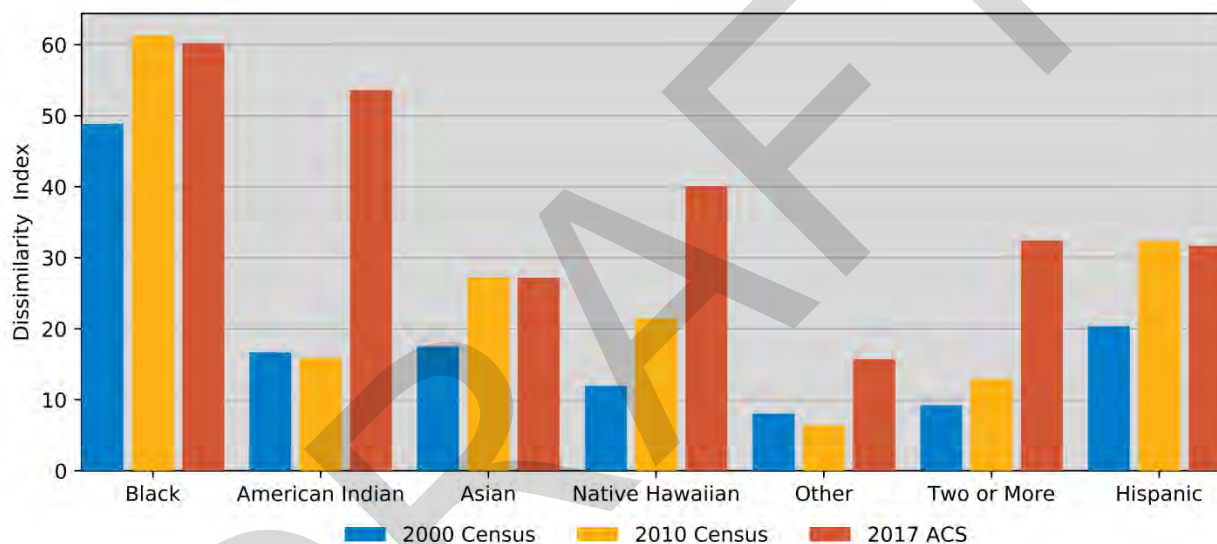
⁹ Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

¹⁰ Wong, David S. “Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels.” *Geographical Analyses*, 35:3. The Ohio State University. July 2003. P. 179.

Segregation Levels

Diagram IV.8 shows the rate of segregation by race and ethnicity for 2000, 2010, and 2017. During this time period, black households have had an increasing level of segregation, which remained at a high level between 2010 and 2017. American Indian households had a moderate level of segregation in 2017, which has grown from a low level in 2000. The level of segregation for Asian households has also increased from 2000 to 2017 but remains at a low level of segregation. Pacific Islander households (indicated on Diagram IV.8 as “Native Hawaiian”) increased in terms of segregation, according to the dissimilarity index, but remained at a low level of segregation in 2017. “Other” race households had a low level of segregation in both 2010 and 2017. Two or more race households are also seeing a rate of increase in the dissimilarity index but remain at a low level of segregation. Hispanic households remained at a low level of segregation in 2017.

Diagram IV.8
Dissimilarity Index
City of Carson



C. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated a R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold, at 40 percent.

R/ECAPs over Time

There were no R/ECAPS in the City of Carson at the time of this study.

D. DISPARITIES IN ACCESS TO OPPORTUNITY

The following section describes the HUD-defined concept of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide only a piece of the total understanding of access to the various opportunities in the community. They are used as measured to compare geographic trends and levels of access within the community.

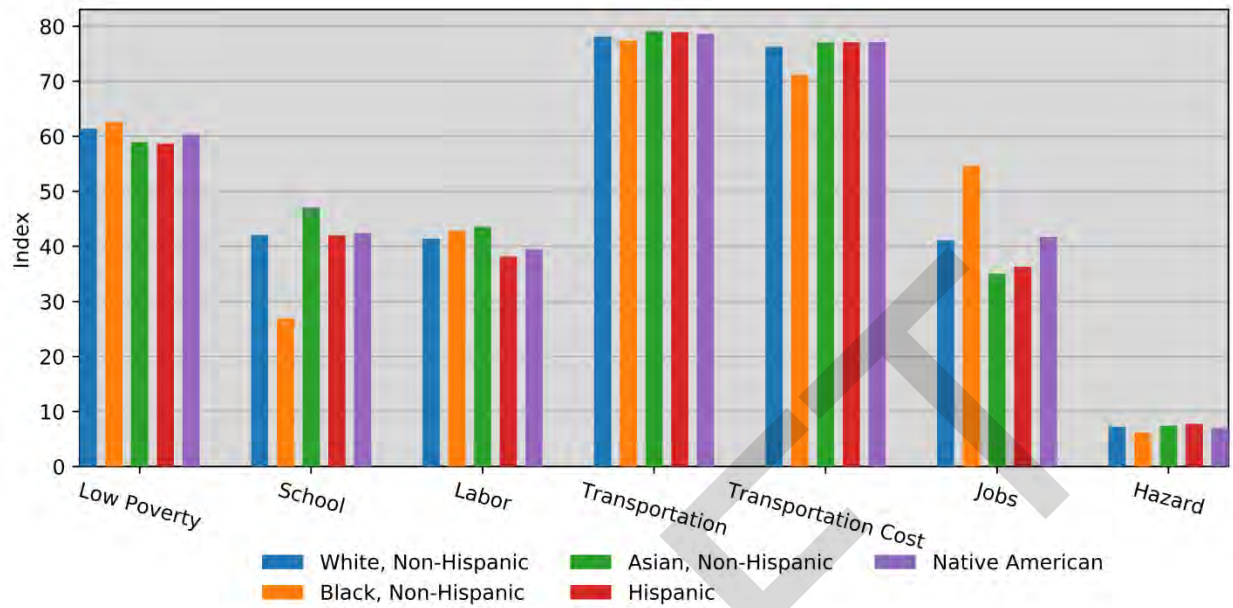
Areas of opportunity are physical places; areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Disparities in access to opportunity examines whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where one lives by an Environmental Health indicator. For each of these a more formal definition is as follows:

- Low Poverty – A measure of the degree of poverty in a neighborhood, at the Census tract level.
- School Proficiency - School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
- Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)
- Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood
- Low Transportation Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region
- Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters
- Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level

Diagram IV.9 shows the level of access to opportunities by race and ethnicity. Black households have lower access to school proficiency, compared to other races and ethnicities in the City of Carson. There is little variance by race for access to all the other opportunities in the City.

Diagram IV.9
Access to Opportunity
 City of Carson

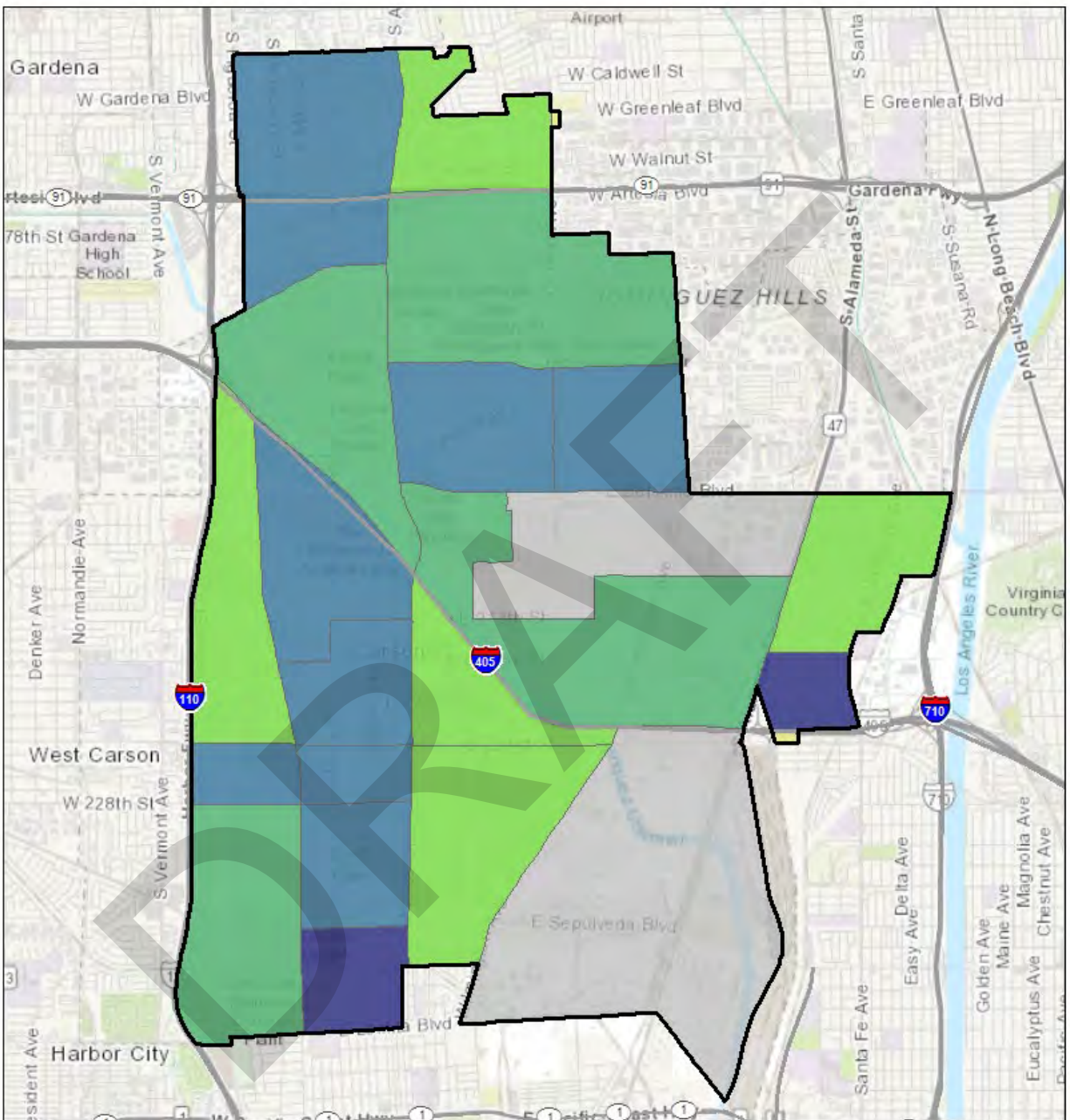


LOW POVERTY INDEX

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level.

The lowest scores were found in western and southern Carson, while the highest scores were found in the more central parts of Carson.

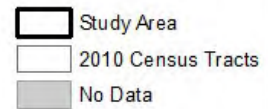
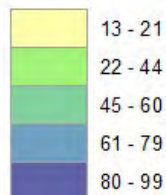
Map IV.3
Low Poverty
 City of Carson
 HUD AFFH Database



LEGEND

Low Poverty Index

A higher Low Poverty Index indicates less exposure to poverty.



Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri

SCHOOL PROFICIENCY INDEX

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic, or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

School Proficiency indices are highest in the western parts of Carson, while the lowest scores were seen in northern Carson.

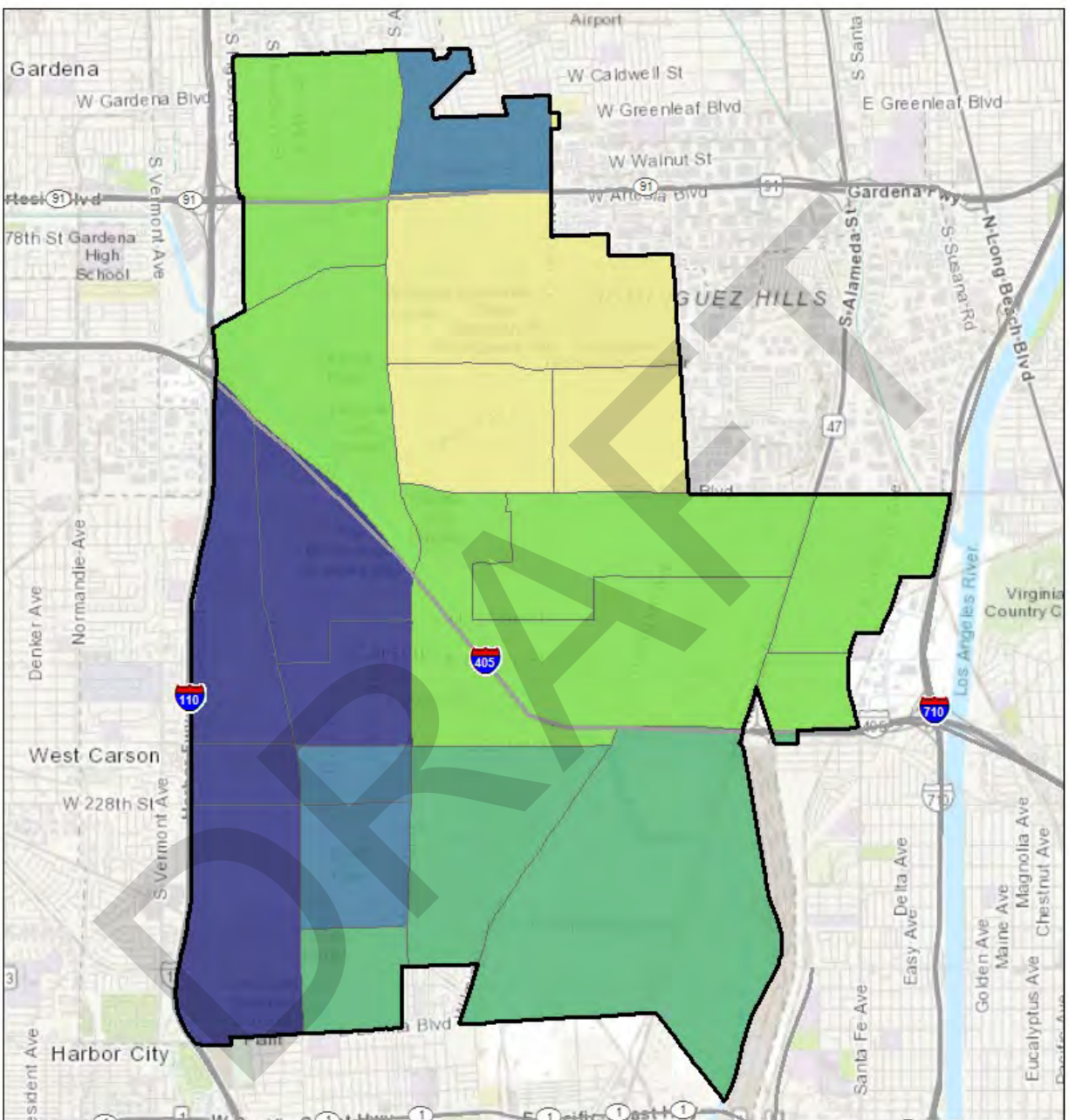
JOBS PROXIMITY INDEX

The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity and is shown in Map IV.5. Job proximity varied widely across the City. The areas in the east had the highest job proximity index ratings.

LABOR MARKET ENGAGEMENT INDEX

The Labor Market Engagement Index provides a measure of unemployment rate, labor force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map IV.6 shows the labor market engagement for the City. Areas in central Carson had the highest rate of labor market engagement, above 48 index ratings. Areas in western and central Carson had the lowest labor market engagement index ratings, with index ratings below 16.

Map IV.
School Proficiency
 City of Carson
 HUD AFFH Database



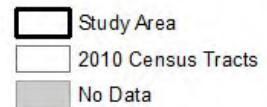
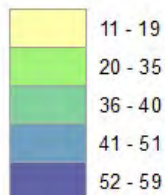
LEGEND

School Proficiency Index

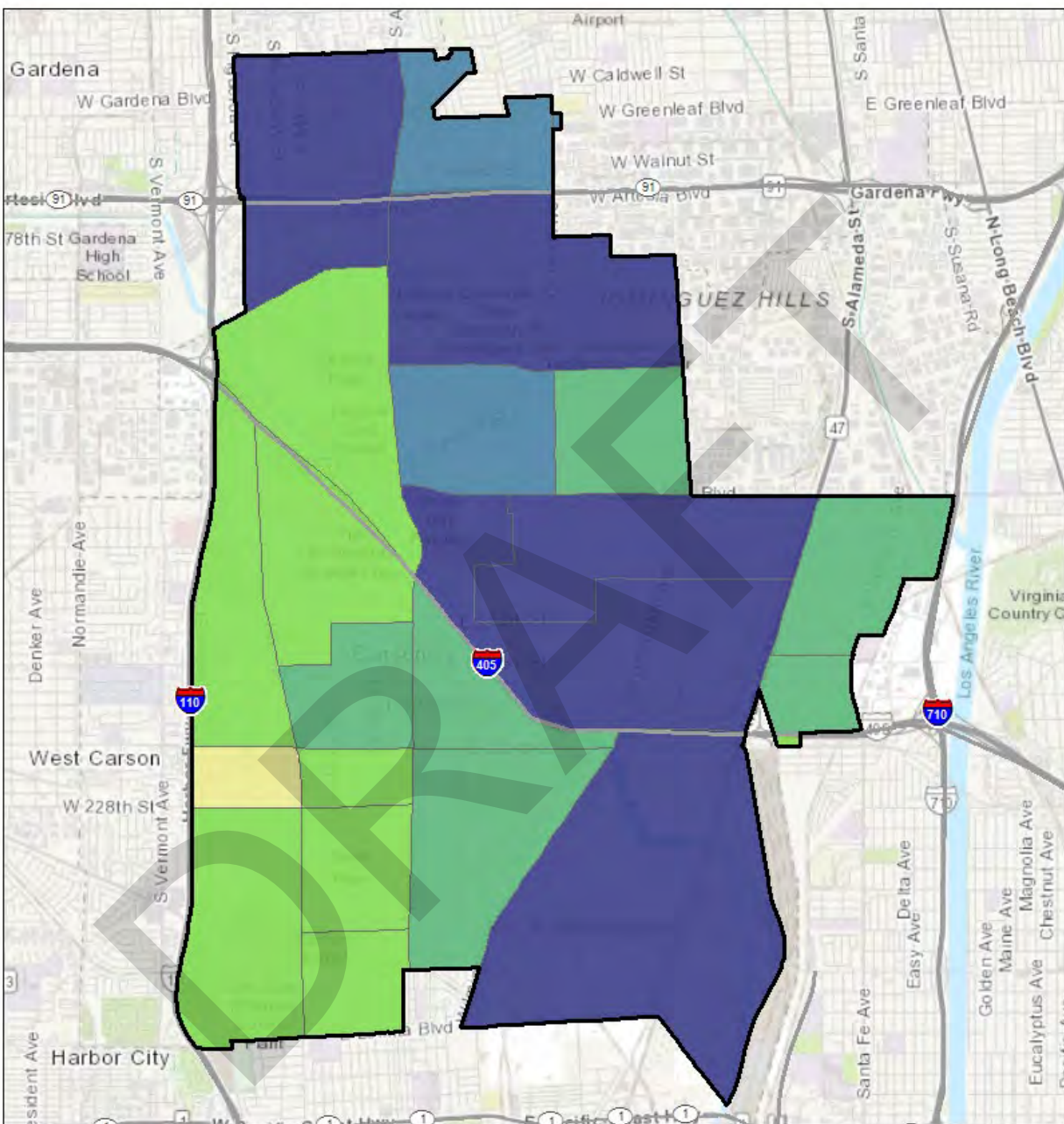
A higher School Proficiency Index indicates a higher quality school system.

Note: The School Proficiency Index has been calculated using the median of each tract's block groups.

Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri



Map IV.5
Job Proximity
City of Carson
HUD AFFH Database

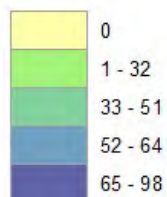





LEGEND

Jobs Proximity Index

A higher Jobs Proximity Index indicates greater access to jobs.

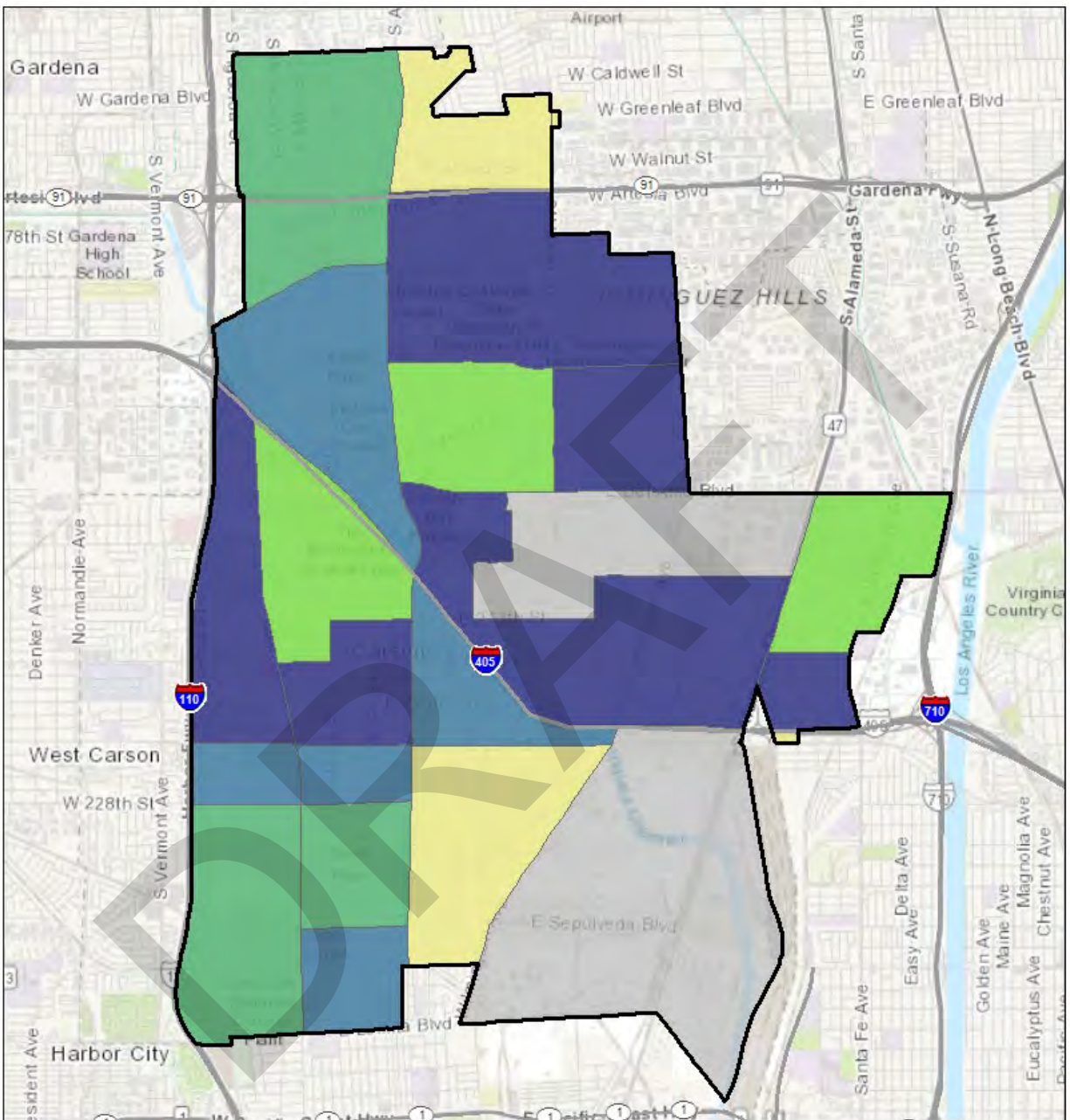
Note: The Jobs Proximity Index has been calculated using the median of each tract's block groups.



 Study Area
 2010 Census Tracts
 No Data

Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri

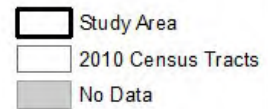
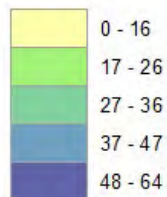
Map IV.6
Labor Market Engagement
 City of Carson
 HUD AFFH Database



LEGEND

Labor Market Engagement Index

A higher Labor Market Engagement Index indicates greater labor market engagement.



Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri

TRANSPORTATION TRIP INDEX

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Trip Index measures proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips was in the western part of Carson, indicating the most transit use in that part of the City.

LOW TRANSPORTATION COST INDEX

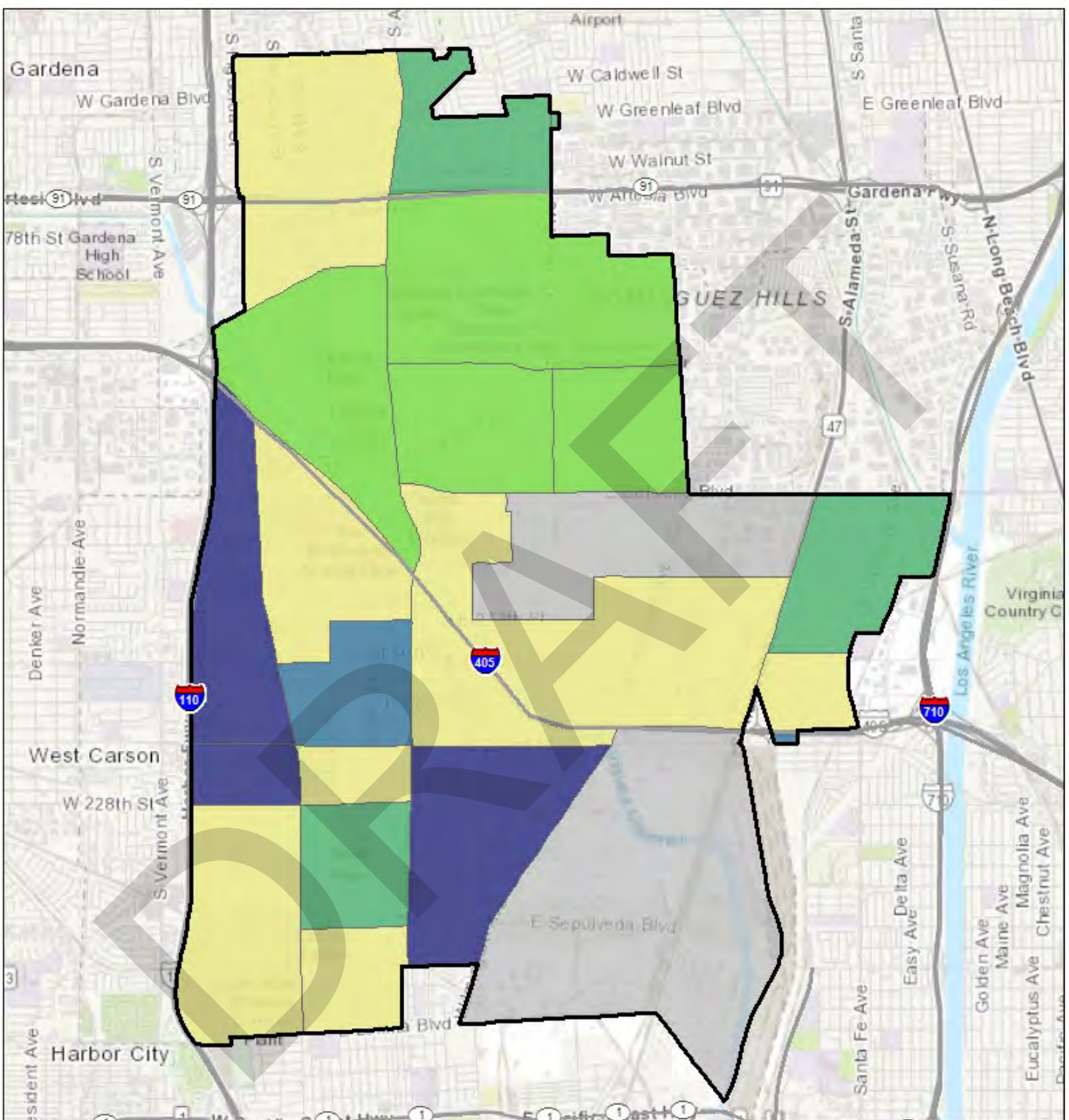
The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs saw a similar pattern as with Transit Trips; the highest transportation cost index ratings were in the western parts of the City.

ENVIRONMENTAL HEALTH INDEX

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

The Environmental Health Index varied widely in the City, with the areas in southern Carson seeing the lowest ratings.

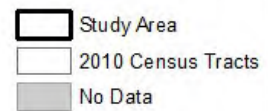
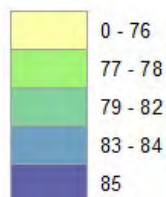
Map IV.7
Transit Trips
 City of Carson
 HUD AFFH Database



LEGEND

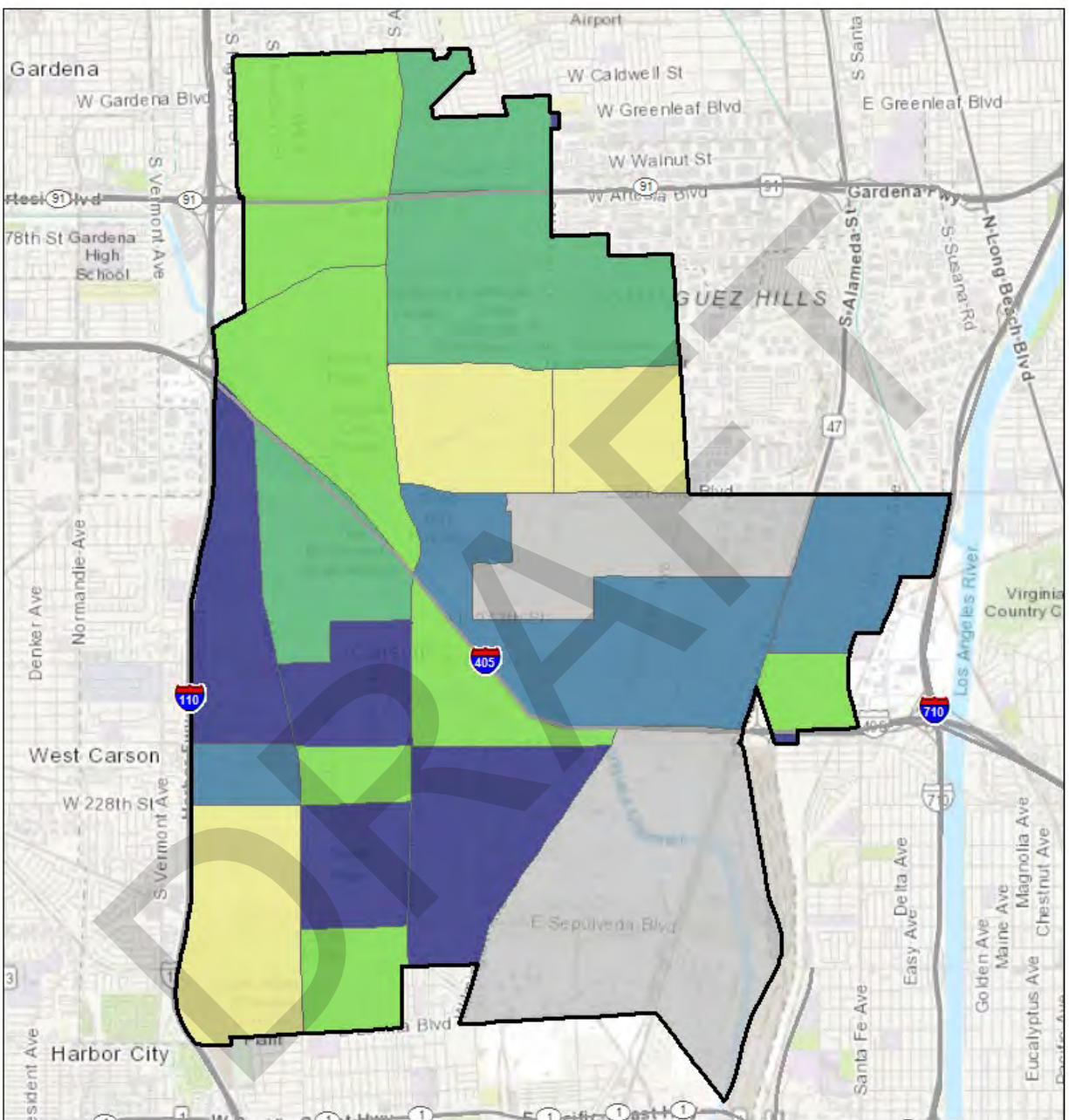
Transit Trips Index

A higher Transit Trips Index indicates a greater likelihood of transit use.



Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri

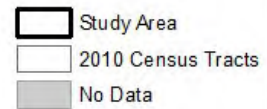
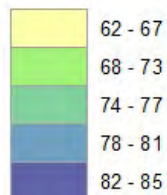
Map IV.8
Transportation Cost
 City of Carson
 HUD AFFH Database



LEGEND

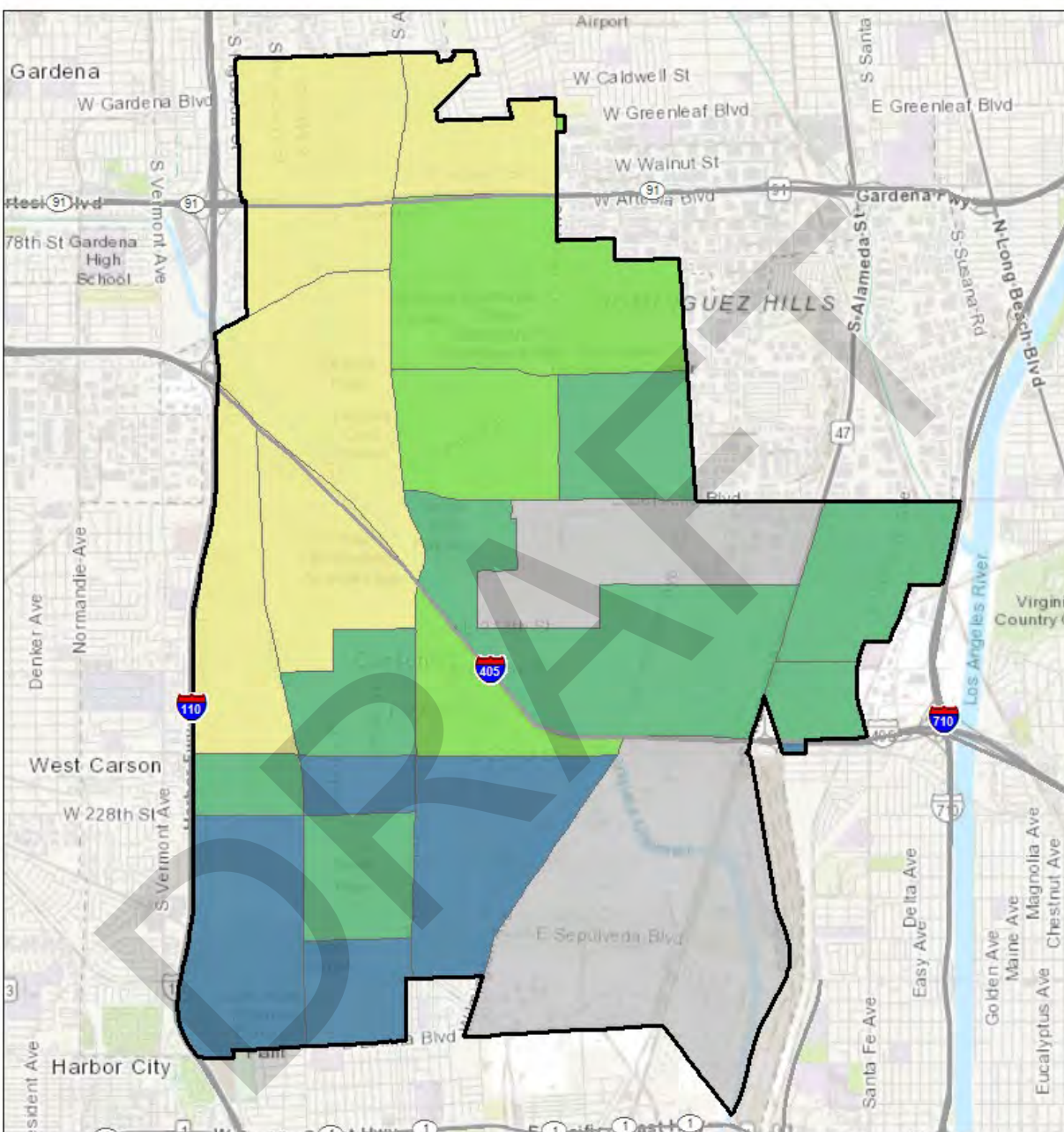
Low Transportation Cost Index

A higher Low Transportation Cost Index indicates lower transportation costs.



Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri

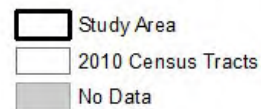
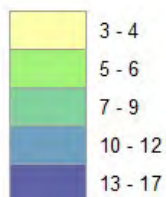
Map IV.9
Environmental Health
 City of Carson
 HUD AFFH Database



LEGEND

Environmental Health Index

A higher Environmental Health Index indicates less exposure to toxins harmful to human health.



Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri

E. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as “housing problems.” For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

Households are classified as having housing problems if they face overcrowding, incomplete plumbing or kitchen facilities, or cost burdens. Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.21. In 2017, an estimated 7.2 percent of households were overcrowded, and an additional 3.3 percent were severely overcrowded.

Table IV.21
Overcrowding and Severe Overcrowding
City of Carson
2010 & 2017 Five-Year ACS Data

2010 & 2017 Five-Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	17,425	91.8%	1,181	6.2%	376	2.0%	18,982
2017 Five-Year ACS	17,558	92.8%	1,037	5.5%	321	1.7%	18,916
Renter							
2010 Five-Year ACS	4,930	83.3%	672	11.3%	319	5.4%	5,921
2017 Five-Year ACS	5,174	80.0%	787	12.2%	504	7.8%	6,465
Total							
2010 Five-Year ACS	22,355	89.8%	1,853	7.4%	695	2.8%	24,903
2017 Five-Year ACS	22,732	89.6%	1,824	7.2%	825	3.3%	25,381

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

There were a total of 54 households with incomplete plumbing facilities in 2017, representing 0.2 percent of households in the City of Carson. This is compared to 63 households lacking complete plumbing facilities in 2010.

Table IV.22
Households with Incomplete Plumbing Facilities
City of Carson
2010 and 2017 Five-Year ACS Data

Households	2010 Five-Year ACS	2017 Five-Year ACS
With Complete Plumbing Facilities	24,840	25,327
Lacking Complete Plumbing Facilities	63	54
Total Households	24,903	25,381
Percent Lacking	0.3%	0.2%

There were 68 households lacking complete kitchen facilities in 2017, compared to 143 households in 2010. This was a change from 0.6 percent of households in 2010 to 0.3 percent in 2017.

Table IV.23 Households with Incomplete Kitchen Facilities City of Carson 2010 and 2017 Five-Year ACS Data		
Households	2010 Five-Year ACS	2017 Five-Year ACS
With Complete Kitchen Facilities	24,760	25,313
Lacking Complete Kitchen Facilities	143	68
Total Households	24,903	25,381
Percent Lacking	0.6%	0.3%

Cost burden is defined as gross housing costs that range from 30 to 50 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

In the City of Carson 21.0 percent of households had a cost burden, and 15.8 percent had a severe cost burden. Some 26.9 percent of renters were cost burdened, and 25.5 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 10.2 percent and a severe cost burden rate of 4.3 percent. Owner occupied households with a mortgage had a cost burden rate of 22.6 percent, and a severe cost burden rate of 15.7 percent.

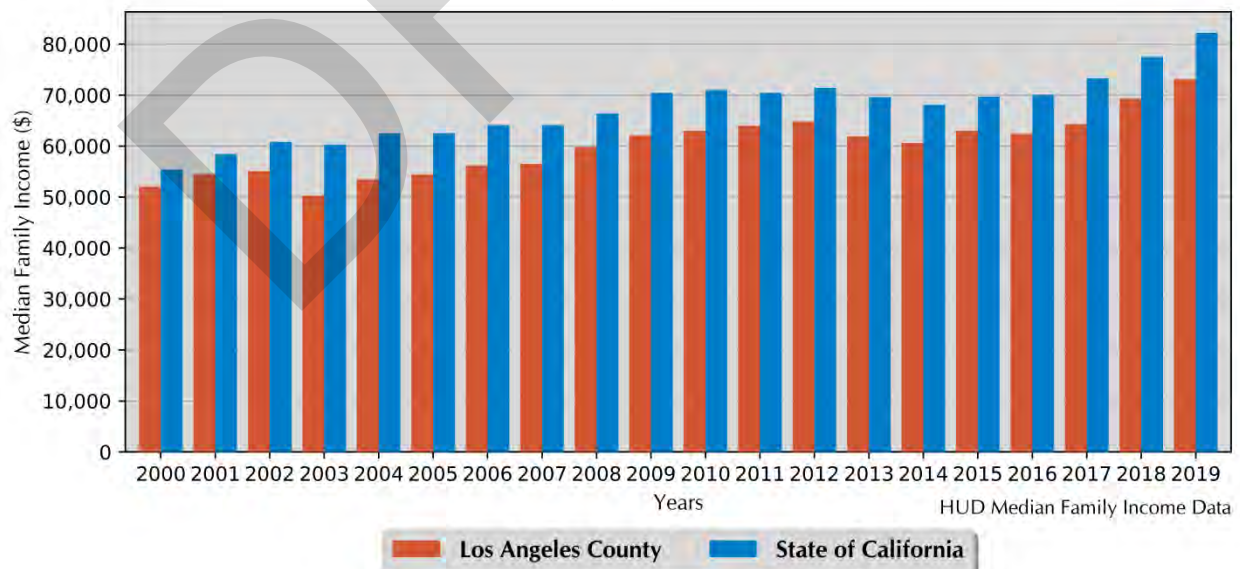
Table IV.24 Cost Burden and Severe Cost Burden by Tenure City of Carson 2010 & 2017 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	7,234	48.7%	4,153	28.0%	3,352	22.6%	113	0.8%	14,852
2017 Five-Year ACS	8,358	61.5%	3,065	22.6%	2,129	15.7%	38	0.3%	13,590
Owner Without a Mortgage									
2010 Five-Year ACS	3,625	87.8%	279	6.8%	127	3.1%	99	2.4%	4,130
2017 Five-Year ACS	4,502	84.5%	541	10.2%	227	4.3%	56	1.1%	5,326
Renter									
2010 Five-Year ACS	2,744	46.3%	1,514	25.6%	1,251	21.1%	412	7.0%	5,921
2017 Five-Year ACS	2,758	42.7%	1,736	26.9%	1,649	25.5%	322	5.0%	6,465
Total									
2010 Five-Year ACS	13,603	54.6%	5,946	23.9%	4,730	19.0%	624	2.5%	24,903
2017 Five-Year ACS	15,618	61.5%	5,342	21.0%	4,005	15.8%	416	1.6%	25,381

Housing Problems by Income

Table IV.25 shows the HUD-calculated Median Family Income (MFI) for a family of four for Los Angeles County. As can be seen in 2019, the MFI was \$73,100, compared to \$82,200 for the State of California.

Year	MFI	State of California MFI
2000	\$52,100	\$55,400
2001	\$54,500	\$58,400
2002	\$55,100	\$60,800
2003	\$50,300	\$60,300
2004	\$53,500	\$62,500
2005	\$54,450	\$62,500
2006	\$56,200	\$64,100
2007	\$56,500	\$64,100
2008	\$59,800	\$66,400
2009	\$62,100	\$70,400
2010	\$63,000	\$71,000
2011	\$64,000	\$70,400
2012	\$64,800	\$71,400
2013	\$61,900	\$69,600
2014	\$60,600	\$68,100
2015	\$63,000	\$69,700
2016	\$62,400	\$70,000
2017	\$64,300	\$73,300
2018	\$69,300	\$77,500
2019	\$73,100	\$82,200

Diagram IV.10
Estimated Median Family Income
Los Angeles County vs. California
HUD Data: 2000 – 2019



Housing Problems by Income, Race, and Tenure

The following tables (taken from HUD's Comprehensive Housing Affordability Strategy, or CHAS) show households with housing problems by race/ethnicity. These tables can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or higher than the jurisdiction average, then they have a disproportionate share of housing problems. Housing problems are defined as any household that has overcrowding, inadequate kitchen or plumbing facilities, or are cost burdened (pay more than 30 percent of their income on housing). In the City of Carson, 2,095 black homeowner households, 1,305 Asian homeowner households, and 2,720 Hispanic homeowner households face housing problems.

Table IV.26
Percent of Homeowner Households with Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$21,930	63.4%	92.0%	61.8%	0%	0%	81.1%	72.4%	73.5%
\$21,931 to \$36,550	36.1%	74.4%	57.4%	0%	100.0%	25.0%	61.4%	58.7%
\$36,551 to \$58,480	21.0%	52.6%	49.5%	100.0%	100.0%	29.2%	61.4%	49.5%
\$58,481 to \$73,100	25.5%	54.2%	47.0%	100.0%	62.5%	50.0%	50.5%	48.5%
Above \$73,100	10.6%	19.1%	17.9%	0%	30.0%	11.3%	18.3%	17.6%
Total	25.9%	39.2%	30.9%	55.6%	38.4%	29.1%	44.6%	37.1%
Without Housing Problems								
\$0 to \$21,930	26.8%	5.7%	34.5%	0%	0%	5.4%	26.0%	21.4%
\$21,931 to \$36,550	63.9%	25.6%	42.6%	0%	0%	75.0%	38.6%	41.3%
\$36,551 to \$58,480	79.0%	47.4%	50.5%	0%	0%	70.8%	38.6%	50.5%
\$58,481 to \$73,100	74.5%	45.8%	53.0%	0%	37.5%	50.0%	49.5%	51.5%
Above \$73,100	89.4%	80.9%	82.1%	100.0%	70.0%	88.7%	81.7%	82.4%
Total	72.7%	60.6%	68.8%	44.4%	54.8%	69.0%	55.2%	62.4%

Table IV.27
Homeowner Households with Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
Without Housing Problems								
\$0 to \$21,930	95	25	95	0	0	4	160	379
\$21,931 to \$36,550	230	115	100	0	0	30	330	805
\$36,551 to \$58,480	490	360	270	0	0	85	540	1,745
\$58,481 to \$73,100	205	330	305	0	15	25	460	1,340
Above \$73,100	805	2,410	2,135	20	105	235	1,875	7,585
Total	1,825	3,240	2,905	20	120	379	3,365	11,854
Total								
\$0 to \$21,930	355	435	275	0	15	74	615	1,769
\$21,931 to \$36,550	360	450	235	0	10	40	855	1,950
\$36,551 to \$58,480	620	760	535	15	4	120	1,400	3,454
\$58,481 to \$73,100	275	720	575	10	40	50	930	2,600
Above \$73,100	900	2,980	2,600	20	150	265	2,295	9,210
Total	2,510	5,345	4,220	45	219	549	6,095	18,983

In total, some 3,954 households face housing problems in the City of Carson. Of these, some 835 black renter households, 905 Asian renter households, and 1,640 Hispanic renter households face housing problems.

Table IV.28
Renter Households with Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$21,930	35	325	235	0	55	95	650	1,395
\$21,931 to \$36,550	30	160	200	10	4	65	425	894
\$36,551 to \$58,480	70	190	200	0	45	70	305	880
\$58,481 to \$73,100	25	120	130	0	10	10	55	350
Above \$73,100	25	40	140	15	10	0	205	435
Total	185	835	905	25	124	240	1,640	3,954
Total								
\$0 to \$21,930	94	360	335	0	55	110	680	1,634
\$21,931 to \$36,550	50	160	240	30	19	75	515	1,089
\$36,551 to \$58,480	110	270	315	0	49	95	435	1,274
\$58,481 to \$73,100	40	124	245	0	10	40	165	624
Above \$73,100	145	370	540	15	40	15	515	1,640
Total	439	1,284	1,675	45	173	335	2,310	6,261

Table IV.29
Percent of Renter Households with Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$21,930	37.2%	90.3%	70.1%	0%	100.0%	86.4%	95.6%	85.4%
\$21,931 to \$36,550	60.0%	100.0%	83.3%	33.3%	21.1%	86.7%	82.5%	82.1%
\$36,551 to \$58,480	63.6%	70.4%	63.5%	0%	91.8%	73.7%	70.1%	69.1%
\$58,481 to \$73,100	62.5%	96.8%	53.1%	0%	100.0%	25.0%	33.3%	56.1%
Above \$73,100	17.2%	10.8%	25.9%	100.0%	25.0%	0%	39.8%	26.5%
Total	42.1%	65.0%	54.0%	55.6%	71.7%	71.6%	71.0%	63.2%
Without Housing Problems								
\$0 to \$21,930	58.5%	9.7%	16.4%	0%	0%	13.6%	4.4%	11.6%
\$21,931 to \$36,550	40.0%	0%	16.7%	66.7%	78.9%	13.3%	17.5%	17.9%
\$36,551 to \$58,480	36.4%	29.6%	36.5%	0%	8.2%	26.3%	29.9%	30.9%
\$58,481 to \$73,100	37.5%	3.2%	46.9%	0%	0%	75.0%	66.7%	43.9%
Above \$73,100	82.8%	89.2%	74.1%	0%	75.0%	100.0%	60.2%	73.5%
Total	56.9%	35.0%	43.3%	44.4%	28.3%	28.4%	29.0%	36.1%

Overall, there are 10,993 households with housing problems in Los Angeles County. This includes 2,930 black households, 2,210 Asian households, 50 American Indian, 208 Pacific Islander, and 400 “other” race households with housing problems. As for ethnicity, there are 4,360 Hispanic households with housing problems. This is shown in Table IV.33.

Table IV.30
Percent of Total Households with Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$21,930	57.9%	91.2%	66.4%	0%	78.6%	84.2%	84.6%	79.2%
\$21,931 to \$36,550	39.0%	81.1%	70.5%	33.3%	48.3%	65.2%	69.3%	67.1%
\$36,551 to \$58,480	27.4%	57.3%	54.7%	100.0%	92.5%	48.8%	63.5%	54.8%
\$58,481 to \$73,100	30.2%	60.4%	48.8%	100.0%	70.0%	38.9%	47.9%	49.9%
Above \$73,100	11.5%	18.2%	19.3%	42.9%	28.9%	10.7%	22.2%	19.0%
Total	28.3%	44.2%	37.5%	55.6%	53.1%	45.2%	51.9%	43.5%
Without Housing Problems								
\$0 to \$21,930	33.4%	7.5%	24.6%	0%	0%	10.3%	14.7%	16.7%
\$21,931 to \$36,550	61.0%	18.9%	29.5%	66.7%	51.7%	34.8%	30.7%	32.9%
\$36,551 to \$58,480	72.6%	42.7%	45.3%	0%	7.5%	51.2%	36.5%	45.2%
\$58,481 to \$73,100	69.8%	39.6%	51.2%	0%	30.0%	61.1%	52.1%	50.1%
Above \$73,100	88.5%	81.8%	80.7%	57.1%	71.1%	89.3%	77.8%	81.0%
Total	70.4%	55.6%	61.6%	44.4%	43.1%	53.6%	48.0%	55.9%

Table IV.31 Total Households with Housing Problems by Income and Race City of Carson 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$21,930	260	725	405	0	55	155	1,095	2,695
\$21,931 to \$36,550	160	495	335	10	14	75	950	2,039
\$36,551 to \$58,480	200	590	465	15	49	105	1,165	2,589
\$58,481 to \$73,100	95	510	400	10	35	35	525	1,610
Above \$73,100	120	610	605	15	55	30	625	2,060
Total	835	2,930	2,210	50	208	400	4,360	10,993
Total								
\$0 to \$21,930	449	795	610	0	70	184	1,295	3,403
\$21,931 to \$36,550	410	610	475	30	29	115	1,370	3,039
\$36,551 to \$58,480	730	1,030	850	15	53	215	1,835	4,728
\$58,481 to \$73,100	315	844	820	10	50	90	1,095	3,224
Above \$73,100	1,045	3,350	3,140	35	190	280	2,810	10,850
Total	2,949	6,629	5,895	90	392	884	8,405	25,244

These racial/ethnic groups were also disproportionately impacted by severe housing problems, as seen in Table IV.32. Severe housing problems include overcrowding at a rate of more than 1.5 persons per room and housing costs exceeding 50 percent of the household income. Some 1,420 black homeowner households face severe housing problems, as well as 1,335 Asian homeowner households, and 1,695 Hispanic homeowner households.

Table IV.32 Percent of Homeowner Households with Severe Housing Problems by Income and Race City of Carson 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$21,930	50.7%	85.1%	43.6%	0%	0%	81.1%	52.5%	59.5%
\$21,931 to \$36,550	19.4%	52.7%	44.7%	0%	100.0%	25.0%	46.2%	42.5%
\$36,551 to \$58,480	4.1%	23.0%	25.0%	0%	100.0%	29.2%	31.1%	23.4%
\$58,481 to \$73,100	0%	8.3%	14.8%	100.0%	25.0%	0%	26.3%	15.7%
Above \$73,100	2.2%	4.4%	9.2%	0%	2.7%	11.3%	13.1%	7.9%
Total	11.8%	18.2	16.2%	22.2%	12.8%	24.6%	27.8%	20.1%
Without A Severe Housing Problems								
\$0 to \$21,930	39.4%	12.6%	52.7%	0%	0%	5.4%	45.9%	35.4%
\$21,931 to \$36,550	80.6%	47.3%	55.3%	0%	0%	75.0%	53.8%	57.5%
\$36,551 to \$58,480	95.9%	77.0%	75.0%	100.0%	0%	70.8%	68.9%	76.6%
\$58,481 to \$73,100	100.0%	91.7%	85.2%	0%	75.0%	100.0%	73.7%	84.3%
Above \$73,100	97.8%	95.6%	90.8%	100.0%	97.3%	88.7%	86.9%	92.1%
Total	86.8%	81.6%	83.6%	77.8%	80.3%	73.6%	72.0%	79.4%

Table IV.33
Percent of Renter Households with Severe Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$21,930	31.9%	76.1%	53.7%	0%	100.0%	72.7%	82.4%	72.1%
\$21,931 to \$36,550	40.0%	40.6%	62.5%	0%	21.1%	86.7%	59.8%	56.2%
\$36,551 to \$58,480	13.6%	18.5%	35.9%	0%	80.0%	10.0%	40.2%	31.5%
\$58,481 to \$73,100	0%	16.0%	26.0%	0%	100.0%	0%	15.2%	19.0%
Above \$73,100	17.2%	10.8%	25.9%	100.0%	25.0%	0%	28.2%	22.9%
Total	20.5%	34.8%	38.6%	33.3%	68.4%	45.6%	52.5%	42.8%
Without A Severe Housing Problems								
\$0 to \$21,930	63.8%	23.9%	32.8%	0%	0%	27.3%	17.6%	24.9%
\$21,931 to \$36,550	60.0%	59.4%	37.5%	100.0%	78.9%	13.3%	40.2%	43.8%
\$36,551 to \$58,480	86.4%	81.5%	64.1%	0%	20.0%	90.0%	59.8%	68.5%
\$58,481 to \$73,100	100.0%	84.0%	74.0%	0%	0%	100.0%	84.8%	81.0%
Above \$73,100	82.8%	89.2%	74.1%	0%	75.0%	100.0%	71.8%	77.1%
Total	78.6%	65.2%	58.8%	66.7%	68.4%	54.4%	47.5%	56.4%

Table IV.34
Percent of Total Households with Severe Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$21,930	46.8%	81.0%	49.2%	0%	78.6%	76.1%	68.2%	65.6%
\$21,931 to \$36,550	22.0%	49.6%	53.7%	0%	48.3%	65.2%	51.3%	47.4%
\$36,551 to \$58,480	5.5%	21.8%	29.1%	0%	81.5%	20.5%	33.2%	25.6%
\$58,481 to \$73,100	0%	9.4%	18.2%	100.0%	40.0%	0%	24.7%	16.4%
Above \$73,100	4.3%	5.1%	12.1%	42.9%	7.4%	10.7%	15.8%	10.1%
Total	13.1%	21.4%	22.6%	27.8%	37.5%	32.6%	34.6%	25.8%
Without A Severe Housing Problems								
\$0 to \$21,930	44.5%	17.7%	41.8%	0%	0%	18.5%	31.0%	30.3%
\$21,931 to \$36,550	78.0%	50.4%	46.3%	100.0%	51.7%	34.8%	48.7%	52.6%
\$36,551 to \$58,480	94.5%	78.2%	70.9%	100.0%	18.5%	79.5%	66.8%	74.4%
\$58,481 to \$73,100	100.0%	90.6%	81.8%	0%	60.0%	100.0%	75.3%	83.6%
Above \$73,100	95.7%	94.9%	87.9%	57.1%	92.6%	89.3%	84.2%	89.9%
Total	85.6%	78.4%	76.5%	72.2%	58.7%	66.3%	65.3%	73.7%

Table IV.35
Total Households with Severe Housing Problems by Income and Race
City of Carson
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$21,930	210	640	300	0	55	140	880	2,225
\$21,931 to \$36,550	90	305	255	0	14	75	700	1,439
\$36,551 to \$58,480	40	225	250	0	44	45	610	1,214
\$58,481 to \$73,100	0	80	150	10	20	0	270	530
Above \$73,100	45	170	380	15	14	30	445	1,099
Total	385	1,420	1,335	25	147	290	2,905	6,507
Total								
\$0 to \$21,930	449	790	610	0	70	184	1,290	3,393
\$21,931 to \$36,550	410	615	475	30	29	115	1,365	3,039
\$36,551 to \$58,480	725	1,030	860	15	54	220	1,835	4,739
\$58,481 to \$73,100	315	850	825	10	50	90	1,095	3,235
Above \$73,100	1,045	3,350	3,140	35	189	280	2,810	10,849
Total	2,944	6,635	5,910	90	392	889	8,395	25,255

As seen in Table IV.36, the most common housing problem tends to be housing cost burdens. More than 4,500 households have a cost burden, and 3,585 have a severe cost burden. Some 1,275 renter households are impacted by cost burdens, and 1,340 are impacted by severe cost burdens. On the other hand, some 3,225 owner-occupied households have cost burdens, and 2,245 have severe cost burdens.

There are a total of 3,225 owner-occupied and 1,275 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 2,245 owner-occupied and 1,340 renter-occupied households had a cost burden greater than 50 percent of income. Overall there are 14,115 households without a housing problem.

Table IV.36
Percent of Housing Problems by Income and Tenure
City of Carson
2012–2016 HUD CHAS Data

Housing Problem	\$0 to \$21,930	\$21,931 to \$36,550	\$36,551 to \$58,480	\$58,481 to \$73,100	Above \$73,100	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	0%	0%	27.3%	0%	28.6%	18.7%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	14.3%	40.0%	55.6%	75.8%	50.9%	50.5%
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	45.8%	28.8%	63.8%	76.5%	65.0%	58.0%
Housing cost burden greater than 50% of income (and none of the above problems)	50.3%	68.8%	79.3%	81.0%	100.0%	62.6%
Housing cost burden greater than 30% of income (and none of the above problems)	53.2%	52.5%	65.0%	79.2%	93.8%	71.7%
Zero/negative income (and none of the above problems)	64.3%	0%	0%	0%	0%	64.3%
Has none of the 4 housing problems	66.7%	80.9%	81.6%	82.7%	86.2%	84.0%
Total	51.9%	64.2%	72.9%	80.6%	84.8%	75.2%
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	100.0%	100.0%	72.7%	0%	71.4%	81.3%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	85.7%	60.0%	44.4%	24.2%	49.1%	49.5%
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	54.2%	71.2%	36.2%	23.5%	35.0%	42.0%
Housing cost burden greater than 50% of income (and none of the above problems)	49.7%	31.2%	20.7%	19.0%	0%	37.4%
Housing cost burden greater than 30% of income (and none of the above problems)	46.8%	47.5%	35.0%	20.8%	6.2%	28.3%
Zero/negative income (and none of the above problems)	35.7%	0%	0%	0%	0%	35.7%
Has none of the 4 housing problems	33.3%	19.1%	18.4%	17.3%	13.8%	16.0%
Total	48.1%	35.8%	27.1%	19.4%	15.2%	24.8%

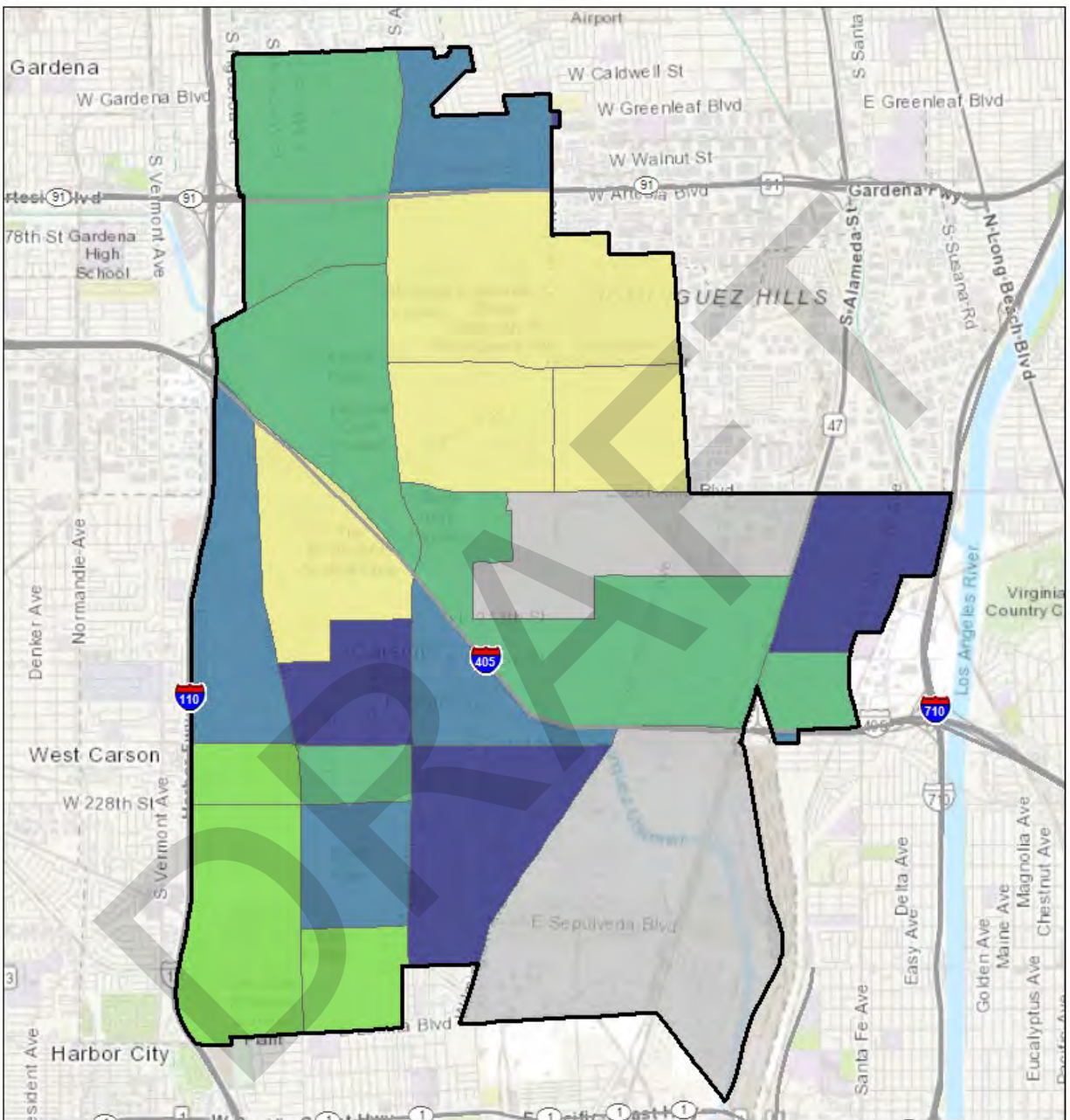
Table IV.37
Housing Problems by Income and Tenure
City of Carson
2012–2016 HUD CHAS Data

Housing Problem	\$0 to \$21,930	\$21,931 to \$36,550	\$36,551 to \$58,480	\$58,481 to \$73,100	Above \$73,100	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	0	0	15	0	10	25
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	15	60	125	125	145	470
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	110	85	300	195	380	1,070
Housing cost burden greater than 50% of income (and none of the above problems)	925	685	365	85	185	2,245
Housing cost burden greater than 30% of income (and none of the above problems)	250	315	900	855	905	3,225
Zero/negative income (and none of the above problems)	90	0	0	0	0	90
Has none of the 4 housing problems	370	805	1,750	1,340	7,585	11,850
Total	1,760	1,950	3,455	2,600	9,210	18,975
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	40	4	40	0	25	109
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	90	90	100	40	140	460
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	130	210	170	60	205	775
Housing cost burden greater than 50% of income (and none of the above problems)	915	310	95	20	0	1,340
Housing cost burden greater than 30% of income (and none of the above problems)	220	285	485	225	60	1,275
Zero/negative income (and none of the above problems)	50	0	0	0	0	50
Has none of the 4 housing problems	185	190	395	280	1,215	2,265
Total	1,630	1,089	1,285	625	1,645	6,274
Total						
Lacking complete plumbing or kitchen facilities	40	4	55	0	35	134
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	105	150	225	165	285	930
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	240	295	470	255	585	1,845
Housing cost burden greater than 50% of income (and none of the above problems)	1,840	995	460	105	185	3,585
Housing cost burden greater than 30% of income (and none of the above problems)	470	600	1,385	1,080	965	4,500
Zero/negative income (and none of the above problems)	140	0	0	0	0	140
Has none of the 4 housing problems	555	995	2,145	1,620	8,800	14,115
Total	3,390	3,039	4,740	3,225	10,855	25,249

Geographic Distribution of Housing Problems

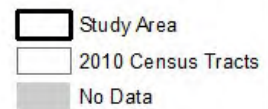
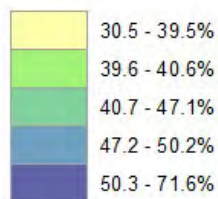
Map IV.10 shows the distribution of housing problems in Carson. Housing problems were more prominent in the southern and central parts of the City, where over half of households experienced housing problems. By contrast, less than 40 percent of households in the areas denoted by the yellow color experienced housing problems.

Map IV.10
Housing Problems
 City of Carson
 HUD AFFH Database



LEGEND

Housing Problems



Data Sources: 2012-2016 CHAS, 2019 TIGER/Line

ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975, permanently authorizing the law in 1988¹¹. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;¹²
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the

¹¹ Prior to that year, Congress had to periodically reauthorize the law.

¹² Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2018, the most recent year for which these data are available.

Banks and other lending institutions handled 40,764 home purchase loans and loan applications in the City from 2008 through 2018. As shown in Table IV.38, a majority of these loans, 10,319, were home purchase loans. In 2018, some 1,828 out of 2,947 were refinancing loans.

Table IV.38 Purpose of Loan by Year City of Carson 2008–2018 HMDA Data												
Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Home Purchase	830	1,071	962	860	1,173	971	824	981	1,032	981	634	10,319
Home Improvement	337	151	92	91	142	134	178	202	304	325	247	2,203
Refinancing	2,249	2,015	1,745	1,672	3,389	3,077	2,089	3,082	3,935	2,923	1,828	28,004
Total	3,416	3,237	2,799	2,623	4,704	4,182	3,091	4,265	5,271	4,229	2,947	40,764

Table IV.39 shows the occupancy status for loan applicants. It is these home purchase loans, and specifically the “owner-occupied” home purchase loans, that will be the focus of the following discussion, as the outcomes of owner-occupied home purchase applications provide the most direct index of the ability of prospective homeowners to choose where they will live. Around 92.6 percent of home-purchase loan applications were submitted by those who intended to live in the home that they purchased.

Table IV.39 Occupancy Status for Applications City of Carson 2008–2018 HMDA Data												
Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Owner-Occupied	3,227	3,120	2,652	2,414	4,295	3,767	2,804	3,947	4,908	3,899	2,734	37,767
Not Owner-Occupied	187	115	146	207	406	399	285	315	355	320	25	2,760
Not Applicable	2	2	1	2	3	16	2	3	8	10	188	237
Total	3,416	3,237	2,799	2,623	4,704	4,182	3,091	4,265	5,271	4,229	2,947	40,764

Owner-occupied home purchase loan applications by loan types are shown in Table IV.40. Between 2008 and 2018, some 45.5 percent of home loan purchases were conventional loans, 49.2 percent were FHA insured, and 5.2 percent were VA guaranteed.

Table IV.40 Owner-Occupied Home Purchase Loan Applications by Loan Type City of Carson 2008–2018 HMDA Data												
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Conventional	474	348	282	269	399	420	402	441	515	480	352	4,382
FHA - Insured	295	662	611	505	626	424	281	417	381	354	179	4,735
VA - Guaranteed	10	17	37	27	47	53	67	66	75	69	37	505
Rural Housing Service or Farm Service Agency	0	0	0	0	0	0	0	0	0	0	0	0
Total	779	1,027	930	801	1,072	897	750	924	971	903	568	9,622

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved by the lender but not accepted by the applicant;
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process;
- “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

As shown in Table IV.41, just over 4,558 home purchase loan applications were originated over the 2008-2018 period, and 1,032 were denied.

Table IV.41 Loan Applications by Action Taken City of Carson 2008–2018 HMDA Data												
Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Loan Originated	282	405	404	336	470	438	376	494	538	494	321	4,558
Application Approved but not Accepted	58	53	56	36	57	45	22	21	31	37	25	441
Application Denied	169	107	95	90	109	91	73	98	77	67	56	1,032
Application Withdrawn by Applicant	76	76	73	65	102	88	74	76	96	76	65	867
File Closed for Incompleteness	27	20	20	16	15	20	22	18	21	23	20	222
Loan Purchased by the Institution	167	361	281	258	319	215	182	217	207	206	81	2,494
Preapproval Request Denied	0	5	1	0	0	0	1	0	0	0	0	7
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0	1	0	0	1
Total	779	1,027	930	801	1,072	897	750	924	971	903	568	9,622

The most common reasons cited in the decision to deny one of these loan applications related to the debt-to-income ratio of the prospective homeowner, as shown in Table IV.42. Credit history and collateral were also commonly given as reasons to deny home purchase loans.

Table IV.42 Loan Applications by Reason for Denial City of Carson 2008–2018 HMDA Data												
Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Debt-to-Income Ratio	32	30	27	25	21	20	24	25	20	17	25	266
Employment History	6	2	2	1	1	1	1	4	2	0	0	20
Credit History	19	13	6	8	19	9	16	10	6	3	6	115
Collateral	22	15	14	15	22	24	12	11	7	8	7	157
Insufficient Cash	14	5	3	3	1	3	1	2	1	3	2	38
Unverifiable Information	11	7	3	6	3	4	1	8	3	3	0	49
Credit Application Incomplete	11	10	8	10	20	8	4	2	6	4	11	94
Mortgage Insurance Denied	2	2	2	0	0	0	0	0	0	0	0	6
Other	27	15	15	11	7	11	7	12	7	5	5	122
Missing	25	8	15	11	15	11	7	24	25	24	0	165
Total	169	107	95	90	109	91	73	98	77	67	56	1032

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.43. Black applicants were denied at an average rate of 23.1 percent, compared to the 15.8 percent for white applicants. American Indian applicants were denied at a rate of 26.7 percent, Asian applicants at a rate of 16.9 percent, and Pacific Islander applicants at a rate of 21.8 percent.

Table IV.43
Denial Rates by Race/Ethnicity of Applicant
City of Carson
2004–2017 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
American Indian	33.3%	100.0%	0.0%	83.3%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	26.7%
Asian	35.2%	20.9%	16.2%	18.5%	20.9%	13.2%	14.8%	16.6%	10.5%	10.1%	16.2%	16.9%
Black	45.4%	25.5%	12.6%	26.1%	25.7%	27.0%	19.2%	20.1%	19.9%	13.8%	17.3%	23.1%
Pacific Islander	47.6%	26.7%	17.4%	5.6%	28.6%	26.3%	11.1%	9.1%	14.3%	25.0%	0.0%	21.8%
White	33.1%	19.3%	22.6%	18.5%	14.5%	14.6%	16.0%	12.1%	6.6%	10.1%	11.3%	15.8%
Not Available	30.2%	16.1%	22.6%	24.0%	17.5%	21.3%	18.2%	27.9%	23.7%	14.5%	15.8%	20.9%
Not Applicable	%	%	%	%	%	%	0.0%	%	%	0.0%	%	0.0%
Average	37.5%	20.9%	19.0%	21.1%	18.8%	17.2%	16.3%	16.6%	12.5%	11.9%	14.9%	18.5%
Hispanic	31.2%	18.5%	22.6%	23.1%	16.0%	15.2%	15.0%	13.3%	7.5%	10.4%	12.2%	16.6%
Non-Hispanic	39.7%	22.3%	16.5%	20.2%	20.8%	17.9%	17.3%	16.4%	12.6%	12.0%	13.7%	18.7%

There were also variations in denial rates by gender. As shown in Table IV.44, the denial rate for prospective female homeowners was 19.9 percent, more than two percentage points higher than the denial rate for male applicants. Between 2008 and 2018, denial rates for female applicants were not consistently above denial rates for males.

Table IV.44
Denial Rates by Gender of Applicant
City of Carson
2008–2018 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	35.2%	39.9%	47.1%	%	37.5%
2009	18.6%	25.8%	23.5%	%	20.9%
2010	17.6%	21.1%	22.2%	%	19.0%
2011	19.3%	22.2%	35.3%	%	21.1%
2012	18.5%	19.2%	21.1%	%	18.8%
2013	17.0%	17.2%	20.0%	%	17.2%
2014	18.3%	11.9%	15.4%	0.0%	16.3%
2015	15.0%	18.4%	26.1%	%	16.6%
2016	10.6%	13.8%	27.3%	%	12.5%
2017	10.6%	12.9%	20.0%	%	11.9%
2018	14.7%	16.7%	7.7%	%	14.9%
Average	17.4%	19.9%	23.6%	0.0%	18.5%

Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

As noted previously, home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of comparable treasury instruments by at least three percentage points. As shown in Table IV.45, some 70 home purchase loans issued in 2008 and after, or 1.5 percent of all owner-occupied home purchase loans issued in the City, carried high annual percentage rates. The rate of HALs in 2008 was 13.1 percent, however, but fell dramatically to 0.0 percent in 2013.

Table IV.45 Originated Owner-Occupied Loans by HAL Status City of Carson 2008–2018 HMDA Data												
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
HAL	37	24	0	3	1	0	1	1	1	1	1	70
Other	245	381	404	333	469	438	375	493	537	493	320	4488
Total	282	405	404	336	470	438	376	494	538	494	321	4,558
Percent HAL	13.1%	5.9%	0.0%	0.9%	0.2%	0.0%	0.3%	0.2%	0.2%	0.2%	0.3%	1.5%

F. PUBLICLY SUPPORTED HOUSING ANALYSIS

The only publicly supported housing units in the City of Carson area Housing Choice Vouchers, which account for 333 units in the City.

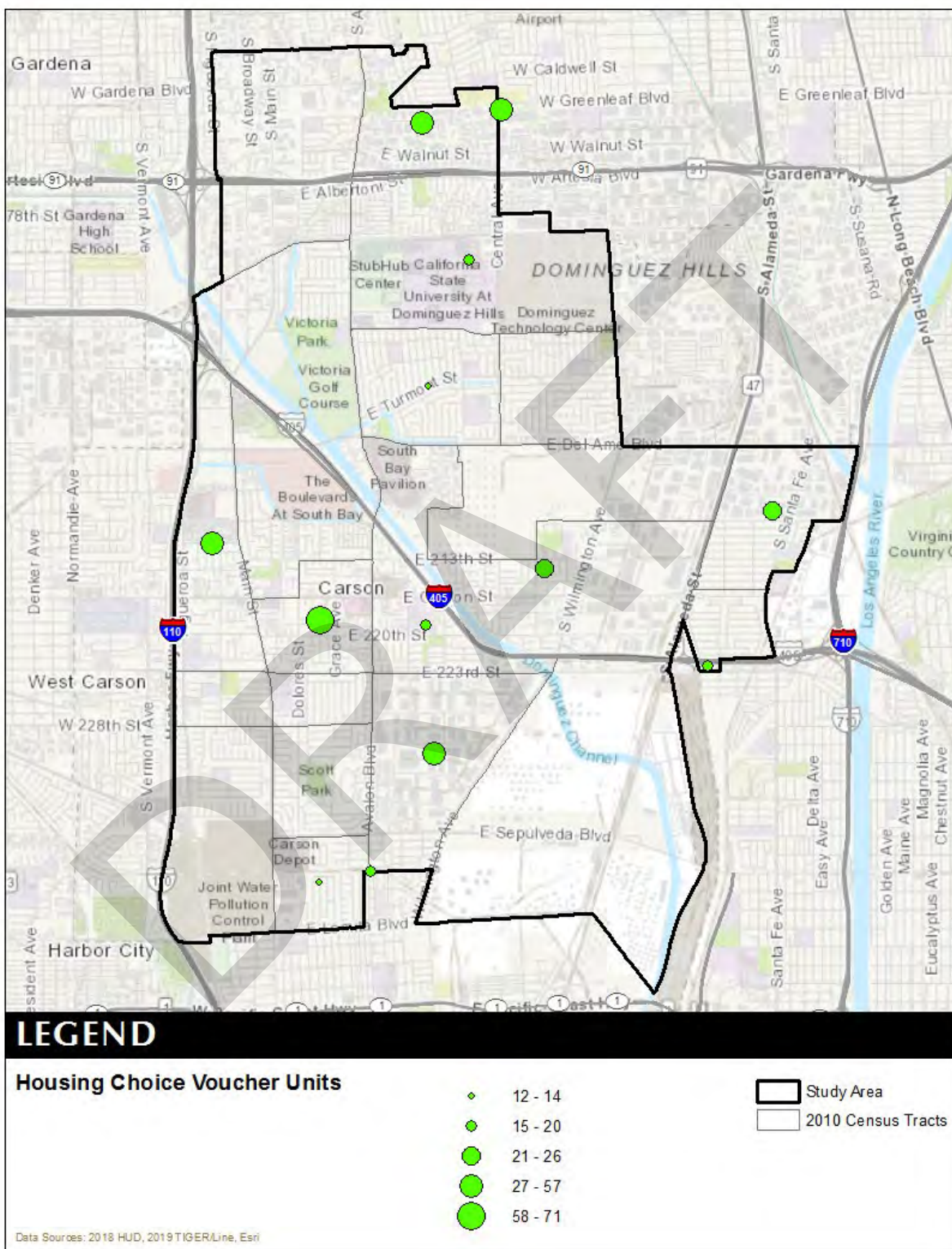
Table IV.46 Residents with Disabilities by Subsidized Housing Type City of Carson HUD AFFH Raw Database		
Program	Total Units	Total Disabled Units
Public Housing		
Project Based Section 8		
Other HUD Multifamily		
Housing Choice Vouchers	333	82
Total	333	82

Map IV.8 shows housing choice vouchers in the City. (Updated information from the Housing Authority of the County of Los Angeles indicates 272 Housing Choice Vouchers in use in Carson as of February 2020, of which 142 are being utilized by disabled residents, but as noted, Table IV.46 and Map IV.8 are based on HUD's AFFH database.)

Disparities in Access to Opportunity

The locations of publicly supported housing units are spread fairly evenly throughout the city, as shown in Map IV.8 on the following page. .

Map IV.8
Housing Choice Voucher Units
 City of Carson
 2017 ACS, 2017 Tigerline, HUD AFFH Tool



G. DISABILITY AND ACCESS ANALYSIS

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.¹³ Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.¹⁴

Persons with Disabilities

Disability by age in Carson, as estimated by the 2017 ACS, is shown in Table IV.47. The disability rate for females was 12.8 percent, compared to 10.3 percent for males. The disability rate grew precipitously higher with age, with 56.6 percent of those over 75 experiencing a disability.

Table IV.47 Disability by Age City of Carson 2017 Five-Year ACS Data						
Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	0%	0	0%	0	0%
5 to 17	331	4.4%	244	3.6%	575	4.0%
18 to 34	397	3.6%	468	4.0%	865	3.8%
35 to 64	1,752	10.2%	1,793	9.7%	3,545	10.0%
65 to 74	817	25.1%	1,005	21.9%	1,822	23.3%
75 or Older	1,313	49.1%	2,599	61.2%	3,912	56.6%
Total	4,610	10.3%	6,109	12.8%	10,719	11.6%

The number of disabilities by type, as estimated by the 2017 ACS, is shown in Table IV.48. Some 6.9 percent of persons in Carson have an ambulatory disability, 6.2 percent have an independent living disability, and 3.0 percent have a self-care disability.

Table IV.48 Total Disabilities Tallied: Aged 5 and Older City of Carson 2017 Five-Year ACS		
Disability Type	Population with Disability	Percent with Disability
Hearing disability	3,050	3.3%
Vision disability	1,988	2.1%
Cognitive disability	4,021	4.6%
Ambulatory disability	6,050	6.9%
Self-Care disability	2,612	3.0%
Independent living disability	4,558	6.2%

¹³ 29 U.S.C. §§794

¹⁴ 42 U.S.C. §§ 12131 – 12165

Housing Accessibility

Accessible housing units are located throughout the City. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features.

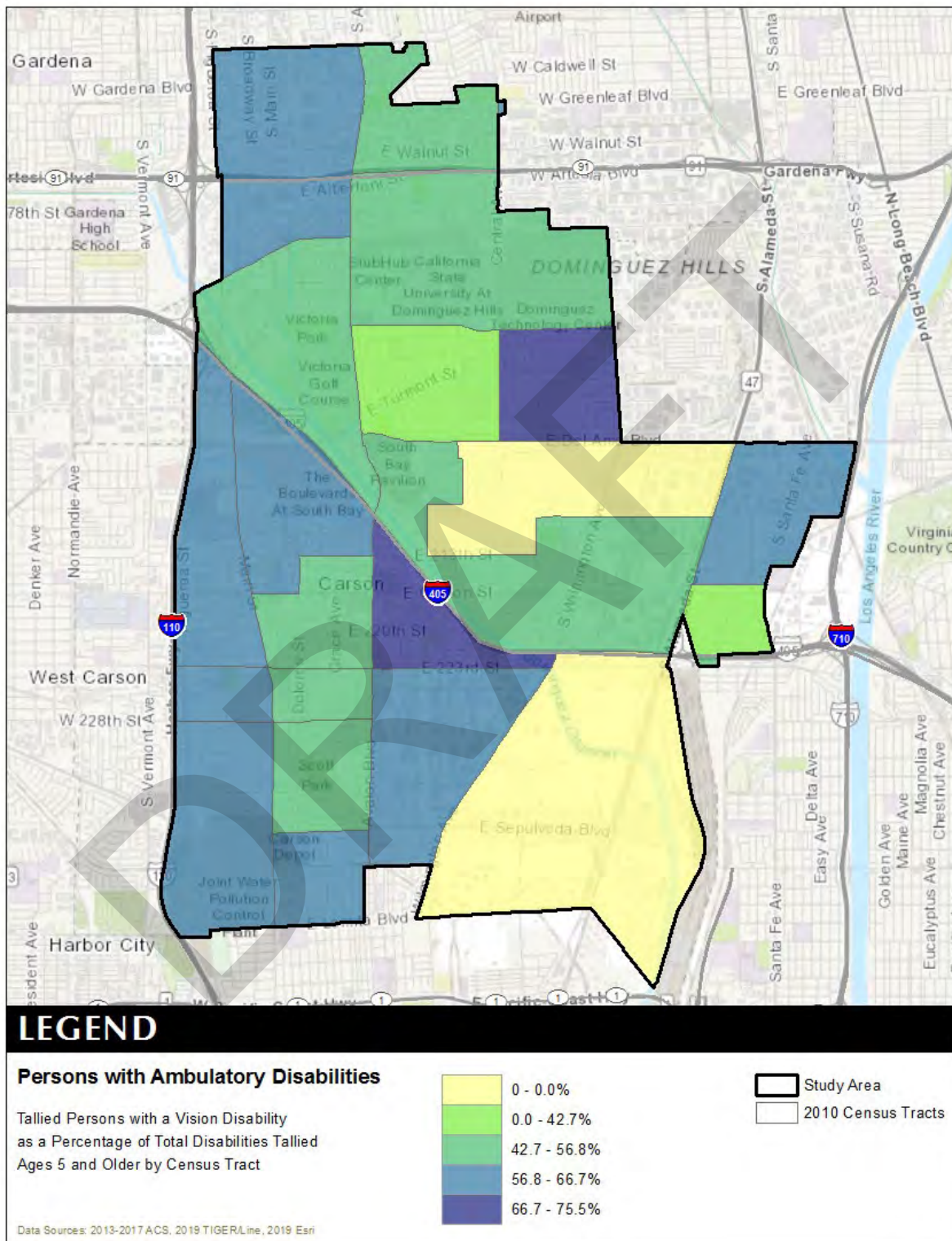
Some 24.6 percent of publicly supported housing units, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the City of Carson.

Table IV.49		
Residents with Disabilities by Subsidized Housing Type		
City of Carson HUD AFFH Raw Database		
Program	Total Units	Total Disabled Units
Public Housing		
Project Based Section 8		
Other HUD Multifamily		
Housing Choice Vouchers	333	82
Total	333	82

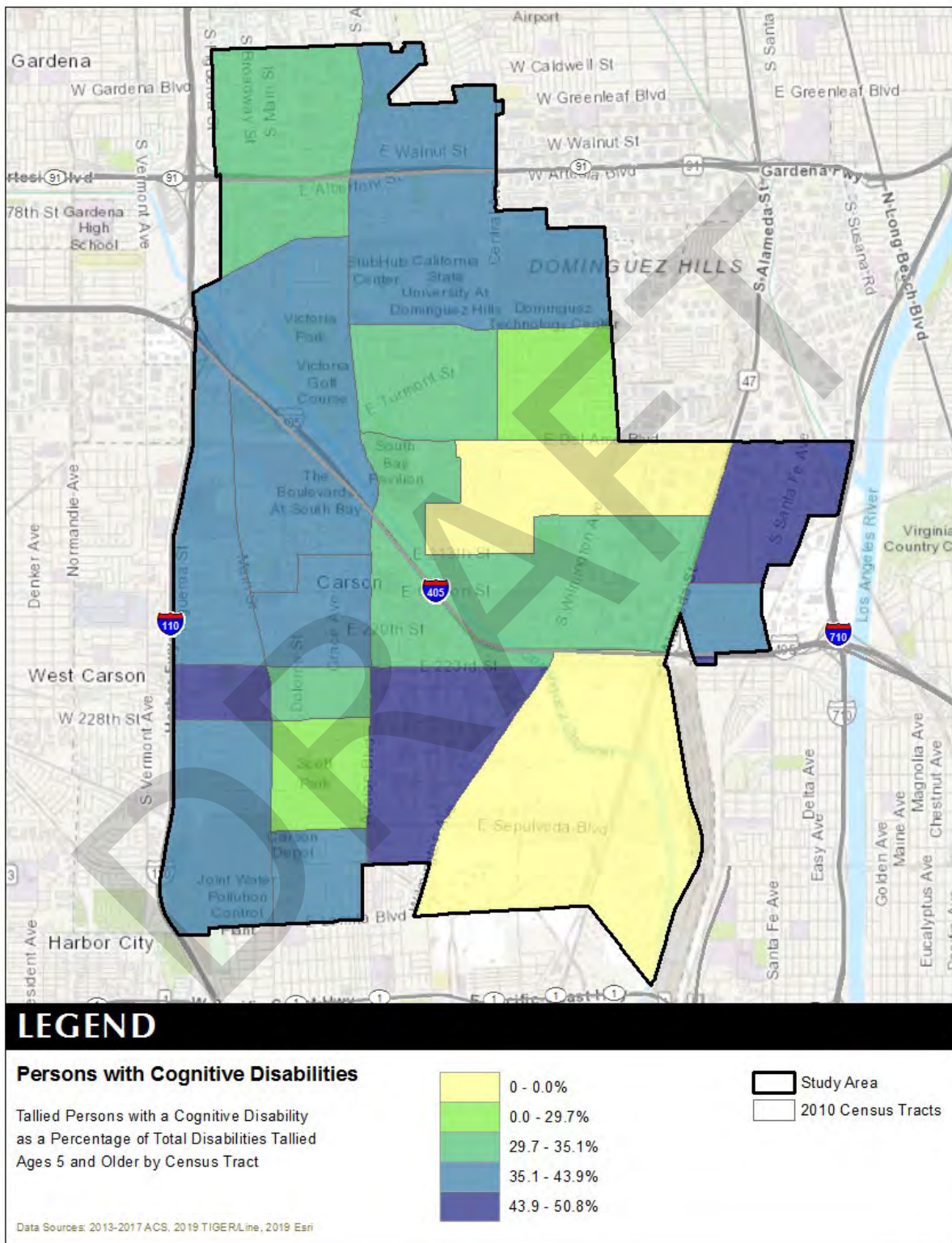
(As was noted earlier, updated information from the Housing Authority of the County of Los Angeles indicates 272 Housing Choice Vouchers in use in Carson as of February 2020, of which 142 are being utilized by disabled residents, however, Table IV.49 is based on HUD's AFFH database.)

The maps on the following pages show the distribution of households with various disabilities. There does not appear to be a concentration of households by disability type in any one area of the City of Carson.

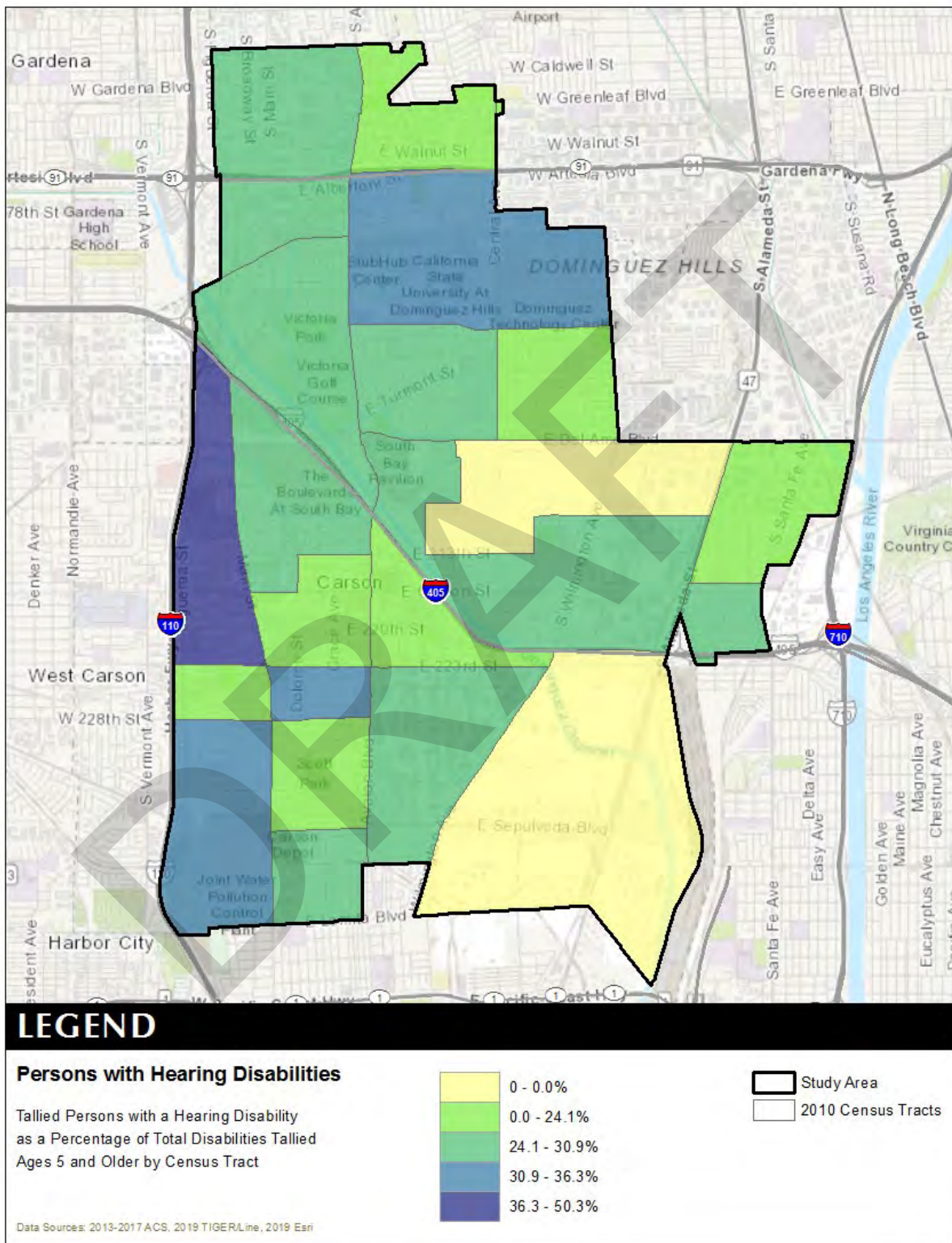
Map IV.9
Persons with Ambulatory Disabilities
 City of Carson
 2017 ACS, 2017 Tigerline, HUD AFFH Tool



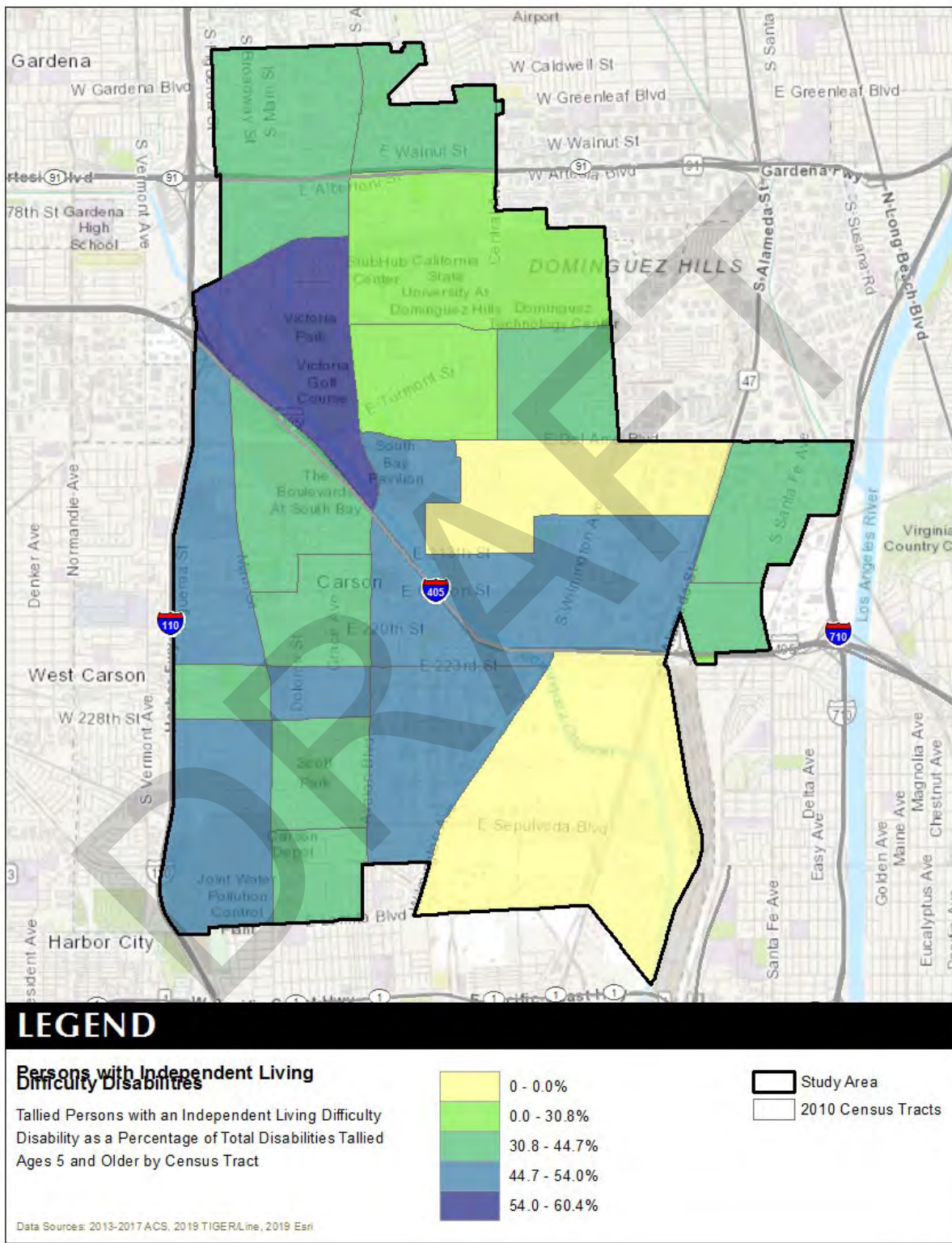
Map IV.10
Persons with Cognitive Disabilities
 City of Carson
 2017 ACS, 2017 Tigerline, HUD AFFH Tool



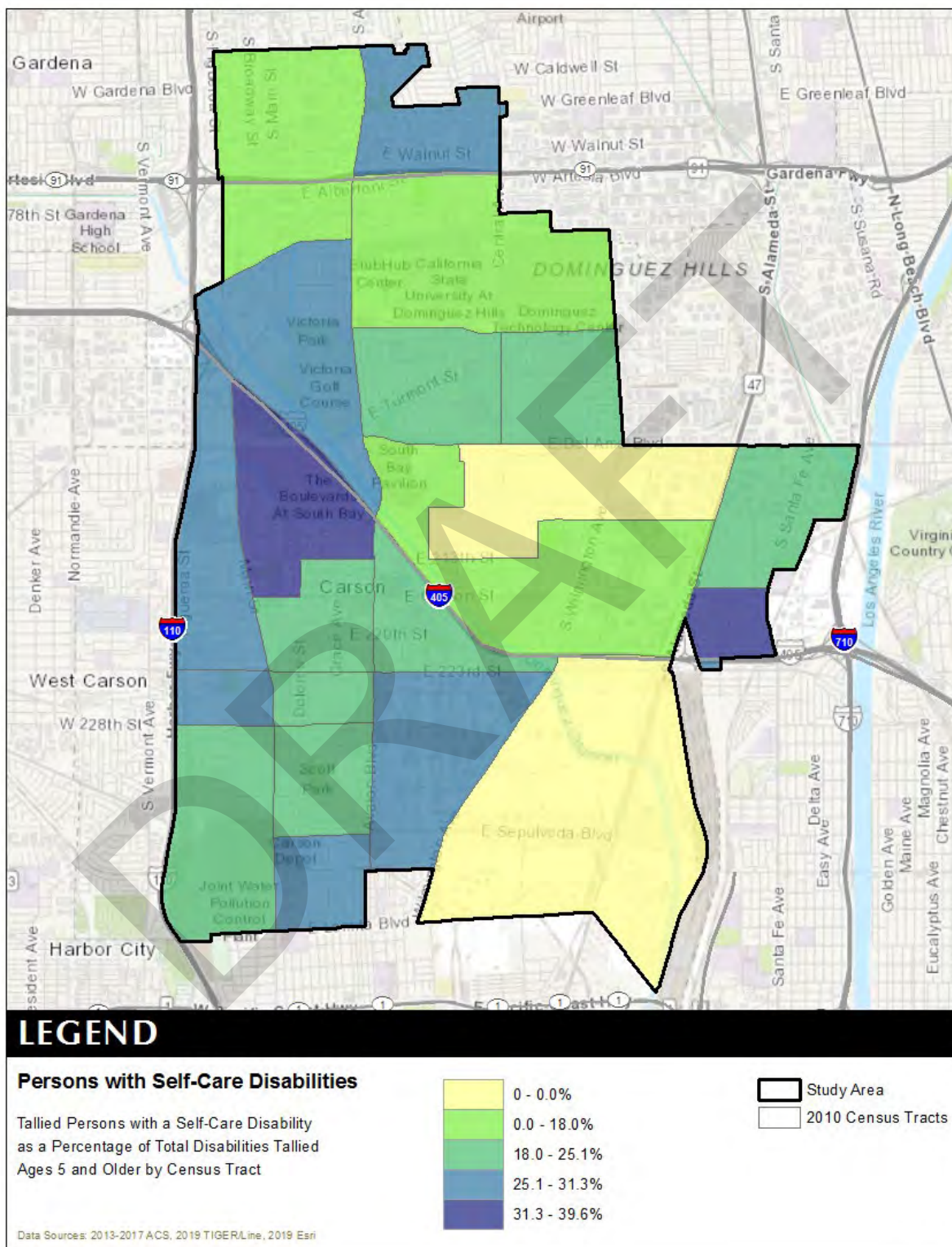
Map IV.11
Persons with Hearing Disabilities
 City of Carson
 2017 ACS, 2017 Tigerline, HUD AFFH Tool



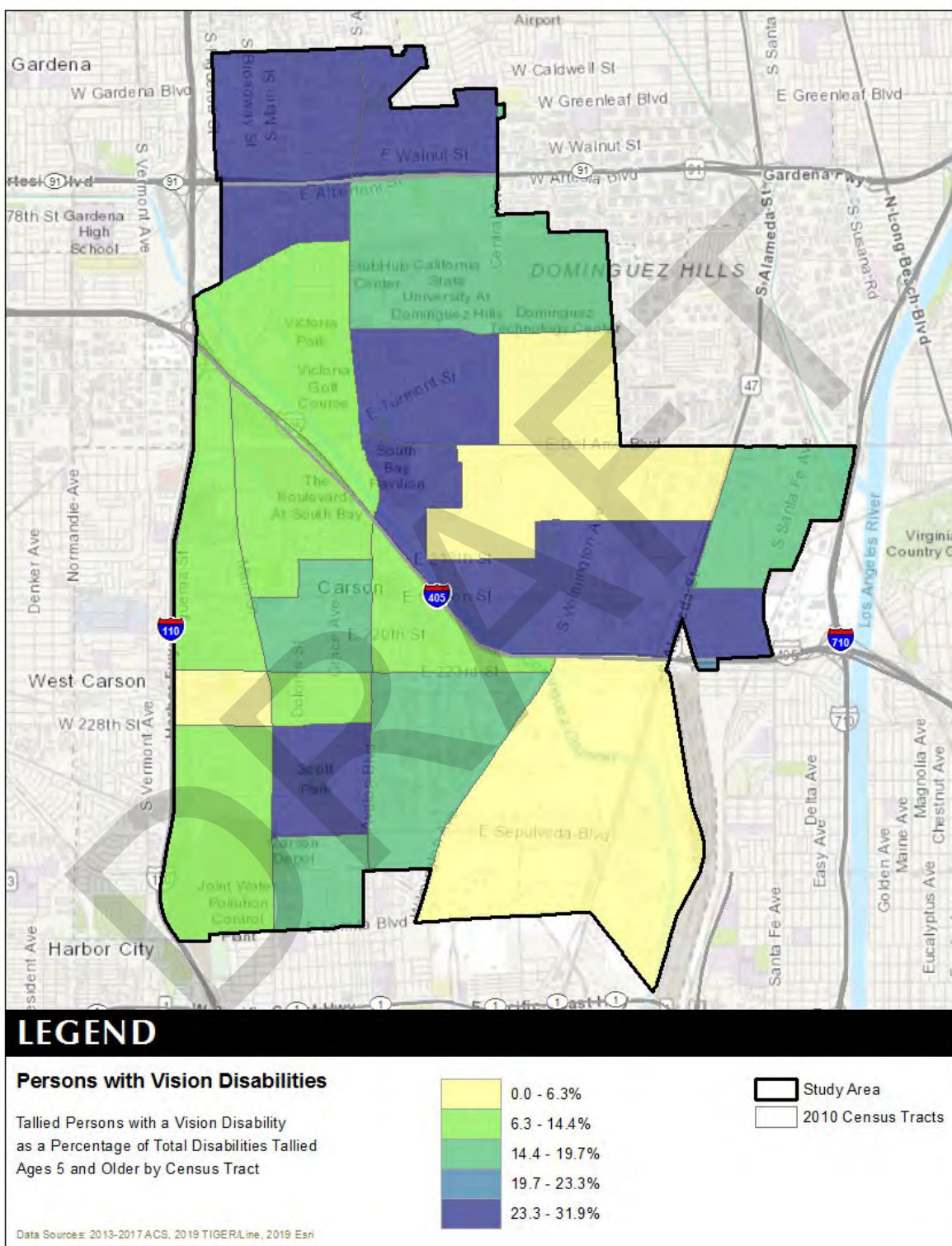
Map IV.12
Persons with Independent Living Disabilities
 City of Carson
 2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.13
Persons with Self Care Disabilities
 City of Carson
 2017 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.14
Persons with Vision Disabilities
 City of Carson
 2017 ACS, 2017 Tigerline, HUD AFFH Tool



H. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U. S. fair housing regulations. The following federal and state rules, regulations, and executive orders inform municipalities and developers of their fair housing obligations and the rights of protected classes. Many of these statutes were successful in generating specialized resources, such as data, to aid organizations, government entities, and individuals in affirmatively furthering fair housing. While some laws have been previously discussed in this report, a list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)¹⁵

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes, but are not allowed to subtract from the seven federally protected classes.¹⁶ The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.¹⁷ On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities based on membership in a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

There are several exceptions to the law. It is legal for developments or buildings for the elderly to exclude families with children. In addition, single-family homes being sold by the owner of an owner-occupied two-family home may be exempt, unless a real estate agency is involved, if they have advertised in a discriminatory way, or if they have made discriminatory statements. There are no exemptions for race discrimination simply because race is covered by other civil rights laws.

The following are examples of Fair Housing Act violations:

1. Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering

¹⁵ 42 U.S.C. 3601, et. Seq., as amended in 1988

¹⁶ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

¹⁷ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.

2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to a prospective purchaser, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.
3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.
4. Requiring employees to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, et cetera of applicants or misrepresenting availability for particular protected classes.
5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance, including denying assistance, offering unequal aid, benefits, or services, aiding or perpetuating discrimination by funding agencies that discriminate, denying planning or advisory board participation, using discriminatory selection or screening criteria, or perpetuating the discrimination against another recipient based on race, color, or national origin.

Section 504 of the Rehabilitation Act of 1973

The Act prohibits discrimination based on disability in any program or activity receiving federal financial assistance. The concepts of “reasonable accommodations” and “reasonable modifications” were clarified in memos dated May 17, 2004 and March 5, 2008. Reasonable accommodations are changes in rules, policies, practices, or services so that a person with a disability can participate as fully in housing activities as someone without a disability. Reasonable modifications are structural changes made to existing premises, occupied or to be occupied by a person with a disability, so they can fully enjoy the premises.

Section 109 of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded by HUD’s Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II applies to state and local government entities and protects people with disabilities from discrimination on the basis of disability in services, programs, and activities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and usable by handicapped persons. The ABA

specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening systems, fire alarms, signs, and other accessible building elements, and is enforced through the Department of Defense, HUD, the General Services Administration, and the U. S. Postal Service.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance. It applies to all ages, and may be enforced by the head of any Federal department or agency by terminating grant funding for those with an express finding on the record who fail to comply with the Act after reasonable notice. HUD established regulations for implementation of the Age Discrimination Act for HUD programs.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.¹⁸

Home Mortgage Disclosure Act (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- The institution is a bank, credit union, or savings association
- Total assets must exceed the coverage threshold¹⁹
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002

¹⁸ "HUD Fair Housing Laws and Presidential Executive Orders."

¹⁹ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans)
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points higher for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans

EXECUTIVE ORDERS

Executive Order 11063; Equal Opportunity in Housing

Signed by President Kennedy on November 20, 1962, the Order prohibits discrimination based on race, color, religion, creed, sex, or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned, operated, or funded by the federal government. The Order also prohibits discrimination in lending practices that involve loans insured or guaranteed by federal government.

Executive Order 12892; Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing

Signed by President Clinton on January 11, 1994, the Order required federal agencies to affirmatively further fair housing in programs and activities with the Secretary of HUD coordinating the effort, and established the President's Fair Housing Council, which is chaired by the Secretary of HUD.

Executive Order 12898; Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Signed by President Clinton on February 11, 1994, the Order requires federal agencies to practice environmental justice in its programs, policies, and activities. Specifically, developers and municipalities using federal funds must evaluate whether or not a project is located in a neighborhood with a concentration of minority and low-income residents or a neighborhood with disproportionate adverse environmental effects on minority and low-income populations. If those conditions are met, viable mitigation measures or alternative project sites must be considered.

Executive Order 13166; Improving Access to Services for Persons with Limited English Proficiency

Signed by President Clinton on August 11, 2000, the Order eliminates limited English proficiency as a barrier to full and meaningful participation in federal programs by requiring federal agencies to examine the services they provide, identify the need for LEP services, then develop and implement a system to provide those services. The Department of Justice issued policy guidance which set forth compliance standards to ensure accessibility to LEP persons.

Executive Order 13217; Community Based Alternatives for Individuals with Disabilities

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disabilities, noting that isolating or

segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

STATE FAIR HOUSING LAWS AND RESOURCES

California Landlord/Tenant Law

The California State Landlord/Tenant Law states that a landlord cannot refuse rent to a tenant or engage in any other type of discrimination on the basis of group characteristics specified by law that are not closely related to the landlord's business needs. Race and religion are examples of group characteristics so specified by law. Arbitrary discrimination on the basis of any personal characteristic such as those listed under this heading also is prohibited. Indeed, the California Legislature has declared that the opportunity to seek, obtain and hold housing without unlawful discrimination is a civil right.

Under California law, it is unlawful for a landlord, managing agent, real estate broker, or salesperson to discriminate against a person or harass a person because of the person's race, color, religion, sex (including pregnancy, childbirth or medical conditions related to them, as well as gender and perception of gender), sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability. California law also prohibits discrimination based on any of the following:

- A person's medical condition or mental or physical disability; or
- Personal characteristics, such as a person's physical appearance or sexual orientation that are not related to the responsibilities of a tenant; or
- A perception of a person's race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability or medical condition, or a perception that a person is associated with another person who may have any of these characteristics.

California Fair Employment and Housing Act Unruh Civil Rights Act

Under California's Fair Employment and Housing Act and Unruh Civil Rights Act, unlawful housing discrimination may include, but is not limited to, the following examples:

- Refusing to sell, rent, or lease.
- Refusing to negotiate for a sale, rental, or lease.
- Representing that housing is not available for inspection, sale, or rental when it is, in fact, available.
- Otherwise denying or withholding housing accommodations.
- Providing inferior housing terms, conditions, privileges, facilities, or services.
- Harassing a person in connection with housing accommodations.
- Canceling or terminating a sale or rental agreement.
- Providing segregated or separated housing accommodations.
- Refusing to permit a person with a disability, at the person with a disability's own expense, to make reasonable modifications to a rental unit that are necessary to allow the person with a disability "full enjoyment of the premises." As a condition of making the modifications, the landlord may require the person with a disability to enter into an agreement to restore the

interior of the rental unit to its previous condition at the end of the tenancy (excluding reasonable wear and tear).

- Refusing to make reasonable accommodations in rules, policies, practices, or services when necessary to allow a person with a disability "equal opportunity to use and enjoy a dwelling" (for example, refusing to allow a companion or service dog of a person with a disability).

FAIR HOUSING COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if he or she feels their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings based on the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

Table IV.50 shows fair housing complaints by basis for the period between 2008 and 2019. During this period, there were a total of 15 complaints. The most common complaint was on the basis of disability, accounting for nine complaints. This was followed by race, accounting for three complaints.

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	0	0	1	2	0	0	0	3	2	0	1	0	9
Race	0	0	0	0	1	1	0	0	0	1	0	0	3
Sex	0	1	0	0	0	0	0	0	0	0	0	1	2
Familial Status	1	0	0	0	0	0	0	0	0	0	0	0	1
National Origin	0	0	0	0	0	0	0	1	0	0	0	0	1
Total Basis	1	1	1	2	1	1	0	4	2	1	1	1	16
Total Complaints	1	1	1	2	1	1	0	4	2	1	1	1	15

Table IV.51 shows Fair Housing complaints by closure during this time period. In 11 of these complaints, there were no cause determinations. In five of these complaints, there was successful settlement/conciliation.

Table IV.51
Fair Housing Complaints by Closure
City of Carson
HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
No cause determination	0	1	1	2	1	0	0	4	1	0	0	1	11
Conciliation/settlement successful	1	0	0	0	0	1	0	0	1	1	1	0	5
Total Closures	1	1	1	2	1	1	0	4	2	1	1	1	16
Total Complaints	1	1	1	2	1	1	0	4	2	1	1	1	15

Table IV.52 shows Fair Housing complaints by issue. The most common issue, accounting for six issues, was discriminatory refusal to rent. This was followed by discriminatory terms, conditions, privileges, or services and facilities.

Table IV.52
Fair Housing Complaints by Issue
City of Carson
HUD Fair Housing Complaints

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Discriminatory refusal to rent	0	0	0	2	1	0	0	0	0	1	1	1	6
Discriminatory terms, conditions, privileges, or services and facilities	0	0	0	0	0	1	0	2	0	0	0	0	3
Other discriminatory acts	1	1	0	0	0	0	0	0	0	0	0	0	2
Failure to make reasonable accommodation	0	0	1	0	0	0	0	1	0	0	0	0	2
Discrimination in terms/conditions/privileges relating to rental	0	0	0	0	0	0	0	0	2	0	0	0	2
Discriminatory refusal to rent and negotiate for rental	0	0	0	0	0	0	0	1	0	0	0	0	1
Total Issues	1	1	1	2	1	1	0	4	2	1	1	1	16
Total Complaints	1	1	1	2	1	1	0	4	2	1	1	1	15

HUD COMPLAINTS WITH CAUSE

Complaints with cause by basis are shown in Table IV.53. The most common complaint with cause was for disability or race, accounting for two complaints each out of the five total complaints with cause.

Table IV.53
Fair Housing Complaints with Cause by Basis
City of Carson
HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	0	0	0	0	0	0	0	0	1	0	1	0	2
Race	0	0	0	0	0	1	0	0	0	1	0	0	2
Familial Status	1	0	0	0	0	0	0	0	0	0	0	0	1
Total Basis	1	0	0	0	0	1	0	0	1	1	1	0	5
Total Complaints	1	0	0	0	0	1	0	0	1	1	1	0	5

Fair Housing complaints with cause by issue are shown in Table IV.54. The most issue with complaints with cause was discriminatory refusal to rent, accounting for two complaints.

Table IV.54
Fair Housing Complaints with Cause by Issue
 City of Carson
 HUD Fair Housing Complaints

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Discriminatory refusal to rent	0	0	0	0	0	0	0	0	0	1	1	0	2
Other discriminatory acts	1	0	0	0	0	0	0	0	0	0	0	0	1
Discriminatory terms, conditions, privileges, or services and facilities	0	0	0	0	0	1	0	0	0	0	0	0	1
Discrimination in terms/conditions/privileges relating to rental	0	0	0	0	0	0	0	0	1	0	0	0	1
Total Issues	1	0	0	0	0	1	0	0	1	1	1	0	5
Total Complaints	1	0	0	0	0	1	0	0	1	1	1	0	5

I. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of six responses. The majority of survey respondents are service providers, representing five respondents.

Table IV.55 What are your primary roles in the housing industry? City of Carson Fair Housing Survey	
Role	Total
Homeowner or Renter	0
Service Provider	5
Property management	0
Local government	0
Law/Legal services	0
Insurance	0
Construction/Development	0
Lending/Mortgage industry	0
Real Estate Sales/Brokerage	0
Appraisal	0
Other	1
Total	6

When asked how familiar they are with fair housing laws, most respondents indicated they were at least somewhat familiar.

Table IV.56 If your primary role in the housing market is homeowner or renter, are you: City of Carson Fair Housing Survey	
Response	Total
Very Familiar	3
Somewhat Familiar	3
Not Familiar	0
Missing	0
Total	6

When asked if fair housing laws are useful, some two respondents indicated they were. Two respondents also indicated that fair housing laws are difficult to understand or follow. Only one respondent felt that fair housing laws were adequately enforced in the community. Two respondents were aware of fair housing activities in the community and one respondent had participated in a training activity in the last year. One respondent was aware of fair housing testing in the community. No respondents were aware of a fair housing ordinance in the City.

Table IV.57
Federal and State Fair Housing Laws
City of Carson
Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws serve a useful purpose?	2	1	2	1	6
Do you think fair housing laws are difficult to understand or follow?	2	2	1	1	6
Do you feel that fair housing laws are adequately enforced in your community?	1	0	4	1	6
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	2	2	1	1	6
If you answered "yes" to the previous question, have you participated in fair housing activities or training within the last 12 months?	1	1	2	2	6
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with Americans with Disabilities Act (ADA) laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing conducted in Carson?	1	3	1	1	6
Are you aware of any fair housing ordinance, regulation, or plan in the City of Carson?	0	3	0	3	6
Are you aware of any policies or practices for "affirmatively furthering fair housing" in the City of Carson? Affirmatively Furthering Fair Housing means taking meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class.	1	2	0	3	6

Of those that have participated in fair housing training, they received that training through a community service provider.

Table IV.58
If you have received fair housing training, where did you receive training or how did you receive training?
City of Carson
Fair Housing Survey

Response	Total
Through legal consultant	0
Online Program or webinar	0
Seminar with company	0
Discussion topic at meeting	0
Community Service Provider	1
Other	0
Missing	5
Total	6

Respondents were not aware of any impediments to fair housing choice in the private sector.

Table IV.59 Fair Housing in the Private Sector City of Carson Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any "impediments to fair housing choice" in these areas in the City of Carson?					
The rental housing market? Example: Refusing to rent based on religion or color.	0	2	3	1	6
The real estate industry? Example: Only showing properties to families with children in certain areas.	0	2	3	1	6
The mortgage and home lending industry? Example: Offering higher interest rates only to women or racial minorities.	0	2	3	1	6
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	0	2	3	1	6
The home insurance industry? Example: Limiting policies and coverage for racial minorities.	0	2	3	1	6
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	0	2	3	1	6
Any other housing services?	0	2	3	1	6

When asked about barriers in the public sector, respondents were most likely to be aware of barriers in land use policies, zoning laws, and the permitting process.

Table IV.60 Fair Housing in the Public Sector City of Carson Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments or barriers to fair housing choice in Carson regarding:					
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	2	1	0	3	6
Zoning laws? Example: Laws that restrict placement of group homes.	2	1	0	3	6
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities compared to other areas.	0	3	0	3	6
Property assessment and tax policies? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	1	1	1	3	6
The permitting process? Example: Not offering written documents on procedures in alternate languages.	2	1	0	3	6
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	1	1	1	3	6
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	1	2	0	3	6
Are you aware of any barriers that limit access to government services, such as a lack of transportation, employment, or social services?	1	1	1	3	6
Are there any other local government actions or regulations in your community that act as barriers to fair housing choice?	1	0	2	3	6

When asked if various factors are occurring in the City of Carson, respondents were most likely to find that a lack of access for seniors and/or people with disabilities to public transportation, lack of affordable housing, lack of affordable public housing, and lack of acceptance of housing choice vouchers had a significant impact.

Table IV.61
Fair Housing in the Public Sector
City of Carson
Fair Housing Survey

Question	Not at All	Slightly	Moderately	Significantly	Don't Know	Missing	Total
How do the factors listed below affect your community?							
Access to public transportation to schools, work, health care, services	0	0	0	2	1	3	6
Access to good nutrition, healthy food, fresh vegetables, etc.	0	0	2	1	0	3	6
Access to school choice	0	0	1	1	1	3	6
Access to proficient Public Schools	0	0	2	1	0	3	6
Access to parks, libraries, other public facilities	1	0	1	1	0	3	6
Access to health care	0	0	1	2	0	3	6
Access to mental health care	0	0	0	2	1	3	6
Access for seniors and/or people with disabilities to public transportation	0	0	0	3	0	3	6
Lack of affordable housing	0	0	0	3	0	3	6
Lack of affordable Public Housing	0	0	0	3	0	3	6
Lack of acceptance of housing choice vouchers	0	0	0	3	0	3	6
Access to education about fair housing laws	0	0	2	1	0	3	6
Gentrification and displacement due to economic pressures	0	0	0	2	1	3	6
Lack of collaboration between agencies	0	0	1	2	0	3	6
Other	0	0	0	0	0	6	6

In a similar fashion, respondents indicated that a lack of affordable rental housing and a lack of affordable single family homes had a significant impact on the City of Carson.

Table IV.62
Fair Housing in the Public Sector
City of Carson
Fair Housing Survey

Question	Not at All	Slightly	Moderately	Significantly	Don't Know	Missing	Total
Do you believe these issues are happening in Carson? If so, how much are the issues impacting the communities?							
Segregation	2	0	1	0	0	3	6
Concentrations of racial or ethnic minorities	0	1	2	0	0	3	6
Concentrations of poverty	2	0	1	0	0	3	6
Differences in access to housing opportunities for people of various income, races, ethnicity, genders, family status	1	1	0	1	0	3	6
Greater share of housing problems for those at lower incomes, of a specific race or ethnicity or national origin, disability, gender, or family status.	0	1	0	2	0	3	6
Challenges for persons with disabilities	0	0	0	2	1	3	6
Lack of housing discrimination enforcement	0	2	1	0	0	3	6
Lack of affordable single-family houses	0	0	0	3	0	3	6
Lack of affordable rental housing	0	0	0	3	0	3	6
Lack of acceptance of housing choice vouchers	0	0	0	2	1	3	6
No or limited education about fair housing laws	0	0	2	1	0	3	6
Gentrification and displacement due to economic pressures	0	0	0	1	2	3	6
Lack of diversity and equity in the Carson School District	1	0	0	0	2	3	6
Other	0	0	0	0	0	0	6

J. MUNICIPAL CODE REVIEW

A review of the City Zoning and Municipal Code was conducted in order to review if there are any barriers in the city's regulations that may impede access to housing. The following narrative is a description of any language or statutes that may act a barrier to fair housing choice.

This review gauged zoning and code regulations that may encourage or limit fair housing choice within the study area. The Municipal Code was reviewed for definitions of dwelling unit, disability, and family. The use of the word family, including a strict definition of family, or limiting the number of people in "family," may limit housing choices within a jurisdiction. The review included the allowance of mixed-use and conditional uses, which may increase opportunities for the development of more affordable housing choices. The review also checked for any policies that encourage the development of affordable housing, as well as any policies that promote fair housing within the community. The review also sought to ascertain any restrictions on group housing and housing for seniors, including definitions and where these units may be permitted.

The City's definition of the word "family" is:

any number of persons living together in a room or rooms comprising a single dwelling unit and related by blood, marriage, or adoption, or bearing the genetic character of a family unit as a relatively permanent single household, including servants and other live-in employees, who reside therein as though members of the family. Any group of persons not related by blood, marriage or adoption but inhabiting a dwelling unit, shall for the purpose of this Chapter be considered to constitute one (1) family if it is a bona fide single household, including servants and other live-in employees contained in such group.

The City does not have a definition of the word "disabled" or "disability." The review did not find any inclusionary policies in the City Code. Community residential care facilities are a conditional use in some residential areas.

The City does encourage the development of affordable housing through a Density Bonus as well as permitted Accessory Living Quarters. However, minimum lot sizes and density restrictions may limit the development of affordable units in some areas of the city.

As noted earlier in this report, one recently-enacted amendment to the Municipal Code addressed one of the impediments identified in the previous (2015, revised in 2017) Analysis of Impediments. The City formerly had a Residential Property Report (RPR) ordinance. Under that ordinance, approval of transfers of residential property within the city were contingent on a report that included an inspection of the property. That ordinance included an exception for spousal transfers, which the previous AI noted could be viewed as a violation of the California Fair Housing and Employment Act prohibition against differential treatment based on marital status. City Council voted to repeal the entire Residential Property Report ordinance on April 6, 2019, and the repeal became effective on September 20, 2019.

Section V. Fair Housing Goals and Priorities

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Carson certifies that it will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the City of Carson has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table V.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that the City of Carson has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the City of Carson has limited capacity to address.

Table V.1
Contributing Factors

City of Carson

Contributing Factors	Priority	Justification
High levels of segregation	High	Black households have moderate to high levels of segregation when considered on the whole of the City of Carson. This is demonstrated by the Dissimilarity Index. The concentration of black households was seen primarily in northern Carson.
Access to School Proficiency	Med	Black households have lower levels of access to proficient schools in the City. However, the City has little control over impacting access on a large scale
Insufficient affordable housing in a range of unit sizes	High	Some 36.8 percent of households have cost burdens. This is more significant for renter households, of which 52.4 percent have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black households are higher than the jurisdiction average according to 2008-2018 HMDA data.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the needs of the growing elderly and disabled population, particularly as the population continues to age. Some 56.6 percent of persons aged 75 and older have at least one form of disability.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table V.2, summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
Review zoning and municipal codes for barriers to housing choice	High levels of segregation Discriminatory patterns in Lending	Segregation	Review zoning for areas with restrictions to housing development, including minimum lot requirements; make appropriate amendments every year for the next five (5) years. Record activities annually.
Increase availability of accessible housing	Insufficient accessible affordable housing	Disability and Access	Review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments over the next five (5) years. Record activities annually.
Promote housing opportunities in high opportunity areas	Insufficient accessible affordable housing	Disproportionate Housing Need	Continue to use CDBG and HOME funds to fund housing rehabilitation for homeowners and rental housing options: 150 residential housing units over five (5) years.
Promote community and service provider knowledge of fair housing	Lack of fair housing infrastructure Insufficient fair housing education Insufficient understanding of credit	Fair Housing Enforcement and Outreach	Continue to promote fair housing education through annual or biannual workshops. Maintain records of activities annually. Ensure that fair housing education materials are available in the Spanish language. Maintain records of activities annually. Promote annual outreach and education related to credit for prospective homebuyers. Maintain records of activities annually. Partner with community agencies to provide financial literacy classes for prospective homebuyers on an annual basis. Maintain records of activities annually.

DRAFT

Section VI. Appendices

A. ADDITIONAL PLAN DATA

Table VI.1 Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant City of Carson 2008–2018 HMDA Data													
Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	Originated	4	0	2	1	3	0	3	4	1	3	1	22
	Denied	2	1	0	5	0	0	0	0	0	0	0	8
	Denial Rate	33.3%	100.0%	0.0%	83.3%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	26.7%
Asian	Originated	59	87	88	75	87	118	69	121	137	116	88	1045
	Denied	32	23	17	17	23	18	12	24	16	13	17	212
	Denial Rate	35.2%	20.9%	16.2%	18.5%	20.9%	13.2%	14.8%	16.6%	10.5%	10.1%	16.2%	16.9%
Black	Originated	71	76	83	68	78	54	80	111	117	119	67	924
	Denied	59	26	12	24	27	20	19	28	29	19	14	277
	Denial Rate	45.4%	25.5%	12.6%	26.1%	25.7%	27.0%	19.2%	20.1%	19.9%	13.8%	17.3%	23.1%
Pacific Islander	Originated	11	11	19	17	25	14	24	10	12	15	3	161
	Denied	10	4	4	1	10	5	3	1	2	5	0	45
	Denial Rate	47.6%	26.7%	17.4%	5.6%	28.6%	26.3%	11.1%	9.1%	14.3%	25.0%	0.0%	21.8%
White	Originated	107	184	164	137	230	204	163	204	226	187	102	1908
	Denied	53	44	48	31	39	35	31	28	16	21	13	359
	Denial Rate	33.1%	19.3%	22.6%	18.5%	14.5%	14.6%	18.2%	12.1%	6.6%	10.1%	11.3%	15.8%
Not Available	Originated	30	47	48	38	47	48	36	44	45	53	48	484
	Denied	13	9	14	12	10	13	8	17	14	9	9	128
	Denial Rate	30.2%	16.1%	22.6%	24.0%	17.5%	21.3%	18.2%	27.9%	23.7%	14.5%	15.8%	20.9%
Not Applicable	Originated	0	0	0	0	0	0	1	0	0	1	0	2
	Denied	0	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	0.0%	%	%	0.0%	%	0.0%
Total	Originated	282	405	404	336	470	438	376	494	538	494	321	4,558
	Denied	169	107	95	90	109	91	73	98	77	67	56	1,032
	Denial Rate	37.5%	20.9%	19.0%	21.1%	18.8%	17.2%	16.3%	16.6%	12.5%	11.9%	14.9%	18.5%
Hispanic	Originated	86	145	127	103	184	162	136	144	160	129	72	1448
	Denied	39	33	37	31	35	29	24	22	13	15	10	288
	Denial Rate	31.2%	18.5%	22.6%	23.1%	16.0%	15.2%	15.0%	13.3%	7.5%	10.4%	12.2%	16.6%
Non-Hispanic	Originated	173	227	228	202	244	238	210	305	339	324	208	2698
	Denied	114	65	45	51	64	52	44	60	49	44	33	621
	Denial Rate	39.7%	22.3%	16.5%	20.2%	20.8%	17.9%	17.3%	16.4%	12.6%	12.0%	13.7%	18.7%

Table VI.2
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
City of Carson
2008–2018 HMDA Data

Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	1	61	78	5	86	33	0	266	1
Employment History	0	8	4	0	8	0	0	20	0
Credit History	1	18	38	8	34	16	0	115	1
Collateral	1	29	38	7	63	18	0	157	1
Insufficient Cash	1	14	8	3	8	4	0	38	1
Unverifiable Information	2	5	12	1	23	6	0	49	2
Credit Application Incomplete	0	21	20	8	31	14	0	94	0
Mortgage Insurance Denied	0	1	1	0	4	0	0	6	0
Other	0	22	32	7	50	11	0	122	0
Missing	2	33	46	6	52	26	0	165	282
Total	8	212	277	45	359	128	0	1032	288
% Missing	25.0%	15.6%	16.6%	13.3%	14.5%	20.3%	%	16.0%	97.9%

Table VI.3
Denial Rates by Gender of Applicant
City of Carson
2008–2018 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	35.2%	39.9%	47.1%	%	37.5%
2009	18.6%	25.8%	23.5%	%	20.9%
2010	17.6%	21.1%	22.2%	%	19.0%
2011	19.3%	22.2%	35.3%	%	21.1%
2012	18.5%	19.2%	21.1%	%	18.8%
2013	17.0%	17.2%	20.0%	%	17.2%
2014	18.3%	11.9%	15.4%	0.0%	16.3%
2015	15.0%	18.4%	26.1%	%	16.6%
2016	10.6%	13.8%	27.3%	%	12.5%
2017	10.6%	12.9%	20.0%	%	11.9%
2018	14.7%	16.7%	7.7%	%	14.9%
Average	17.4%	19.9%	23.6%	0.0%	18.5%

Table VI.4
Loan Applications by Selected Action Taken by Gender of Applicant

City of Carson
2008–2018 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Male	Originated	166	280	252	192	299	292	245	322	339	287	168	2842
	Denied	90	64	54	46	68	60	55	57	40	34	29	597
	Denial Rate	35.2%	18.6%	17.6%	19.3%	18.5%	17.0%	18.3%	15.0%	10.6%	10.6%	14.7%	17.4%
Female	Originated	107	112	131	133	156	130	119	155	175	183	125	1526
	Denied	71	39	35	38	37	27	16	35	28	27	25	378
	Denial Rate	39.9%	25.8%	21.1%	22.2%	19.2%	17.2%	11.9%	18.4%	13.8%	12.9%	16.7%	19.9%
Not Available	Originated	9	13	21	11	15	16	11	17	24	24	24	185
	Denied	8	4	6	6	4	4	2	6	9	6	2	57
	Denial Rate	47.1%	23.5%	22.2%	35.3%	21.1%	20.0%	15.4%	26.1%	27.3%	20.0%	7.7%	23.6%
Not Applicable	Originated	0	0	0	0	0	0	1	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	0.0%	%	%	%	%	0.0%
Total	Originated	282	405	404	336	470	438	376	494	538	494	321	4,558
	Denied	169	107	95	90	109	91	73	98	77	67	56	1,032
	Denial Rate	37.5%	20.9%	19.0%	21.1%	18.8%	17.2%	16.3%	16.6%	12.5%	11.9%	14.9%	18.5%

Table VI.5
Denial Rates by Income of Applicant
City of Carson
2008–2018 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	50.0%	35.7%	40.0%	33.3%	37.5%	66.7%	66.7%	55.6%	60.0%	16.7%	17.4%	40.4%
\$30,001–\$50,000	33.3%	21.7%	24.5%	22.4%	24.1%	19.6%	36.1%	23.1%	12.1%	17.6%	42.9%	23.7%
\$50,001–\$75,000	39.2%	20.2%	18.8%	18.6%	12.7%	16.0%	13.3%	16.4%	14.3%	16.5%	11.4%	17.8%
\$75,001–\$100,000	33.8%	18.8%	14.5%	25.4%	21.1%	13.2%	16.4%	18.9%	9.9%	13.7%	11.4%	17.7%
\$100,001–\$150,000	41.6%	18.2%	21.8%	18.5%	20.6%	17.5%	12.7%	13.4%	14.2%	9.9%	17.5%	17.6%
Above \$150,000	33.3%	37.5%	20.8%	16.7%	31.6%	20.0%	6.5%	10.2%	10.1%	7.7%	11.5%	15.6%
Data Missing	%	%	%	%	%	%	%	%	%	%	%	%
Total	37.5%	20.9%	19.0%	21.1%	18.8%	17.2%	16.3%	16.6%	12.5%	11.9%	14.9%	18.5%

Table VI.6
Loan Applications by Income of Applicant: Originated and Denied
City of Carson
2008–2018 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	Loans Originated	6	9	6	6	5	4	2	4	2	5	19	68
	Applications Denied	6	5	4	3	3	8	4	5	3	1	4	46
	Denial Rate	50.0%	35.7%	40.0%	33.3%	37.5%	66.7%	66.7%	55.6%	60.0%	16.7%	17.4%	40.4%
\$30,001–\$50,000	Loans Originated	18	54	37	38	66	41	23	20	29	14	4	344
	Applications Denied	9	15	12	11	21	10	13	6	4	3	3	107
	Denial Rate	33.3%	21.7%	24.5%	22.4%	24.1%	19.6%	36.1%	23.1%	12.1%	17.6%	42.9%	23.7%
\$50,001–\$75,000	Loans Originated	59	134	151	144	193	157	85	102	96	71	39	1231
	Applications Denied	38	34	35	33	28	30	13	20	16	14	5	266
	Denial Rate	39.2%	20.2%	18.8%	18.6%	12.7%	16.0%	13.3%	16.4%	14.3%	16.5%	11.4%	17.8%
\$75,001–\$100,000	Loans Originated	94	112	130	85	112	125	127	154	183	132	78	1332
	Applications Denied	48	26	22	29	30	19	25	36	20	21	10	286
	Denial Rate	33.8%	18.8%	14.5%	25.4%	21.1%	13.2%	16.4%	18.9%	9.9%	13.7%	11.4%	17.7%
\$100,001–\$150,000	Loans Originated	73	81	61	53	81	99	110	161	157	200	127	1203
	Applications Denied	52	18	17	12	21	21	16	25	26	22	27	257
	Denial Rate	41.6%	18.2%	21.8%	18.5%	20.6%	17.5%	12.7%	13.4%	14.2%	9.9%	17.5%	17.6%
Above \$150,000	Loans Originated	32	15	19	10	13	12	29	53	71	72	54	380
	Applications Denied	16	9	5	2	6	3	2	6	8	6	7	70
	Denial Rate	33.3%	37.5%	20.8%	16.7%	31.6%	20.0%	6.5%	10.2%	10.1%	7.7%	11.5%	15.6%
Data Missing	Loans Originated	0	0	0	0	0	0	0	0	0	0	0	0
	Applications Denied	0	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	%	%	%	%	%	%
Total	Loan Originated	282	405	404	336	470	438	376	494	538	494	321	4,558
	Application Denied	169	107	95	90	109	91	73	98	77	67	56	1,032
	Denial Rate	37.5%	20.9%	19.0%	21.1%	18.8%	17.2%	16.3%	16.6%	12.5%	11.9%	14.9%	18.5%

Table VI.7 Denial Rates of Loans by Race/Ethnicity and Income of Applicant City of Carson 2008–2018 HMDA Data								
Race	\$30,000 or Below	\$30,001 – \$50,000	\$50,001 – \$75,000	\$75,001 – \$100,000	\$100,001 – \$150,000	> \$150,000	Data Missing	Average
American Indian	%	50.0%	30.0%	11.1%	25.0%	100.0%	%	26.7%
Asian	35.7%	23.6%	17.9%	14.9%	15.3%	15.0%	%	16.9%
Black	38.9%	31.6%	22.6%	24.3%	22.8%	15.4%	%	23.1%
Pacific Islander	0.0%	50.0%	13.3%	24.6%	20.4%	25.0%	%	21.8%
White	41.9%	19.5%	15.5%	14.5%	14.0%	15.6%	%	15.8%
Not Available	61.1%	31.2%	20.4%	19.2%	19.6%	12.7%	%	20.9%
Not Applicable	0.0%	%	%	0.0%	%	%	%	0.0%
Average	40.4%	23.7	17.8%	17.7%	17.6%	15.6%	%	18.5%
Non-Hispanic	45.2%	22.7	16.2%	13.9%	15.2%	15.9%	%	16.6%
Hispanic	32.3%	22.9	18.6%	19.0%	17.4%	16.4%	%	18.7%

Table VI.8 Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied City of Carson 2008–2018 HMDA Data									
Race		\$30,000 or Below	\$30,001 – \$50,000	\$50,001 – \$75,000	\$75,001 – \$100,000	\$100,001 – \$150,000	> \$150,000	Data Missing	Total
American Indian	Loans Originated	0	1	7	8	6	0	0	22
	Applications Denied	0	1	3	1	2	1	0	8
	Denial Rate	%	50.0%	30.0%	11.1%	25.0%	100.0%	%	26.7%
Asian	Loans Originated	18	68	261	297	305	96	0	1045
	Applications Denied	10	21	57	52	55	17	0	212
	Denial Rate	35.7%	23.6%	17.9%	14.9%	15.3%	15.0%	%	16.9%
Black	Loans Originated	11	39	202	271	291	110	0	924
	Applications Denied	7	18	59	87	86	20	0	277
	Denial Rate	38.9%	31.6%	22.6%	24.3%	22.8%	15.4%	%	21.8%
Pacific Islander	Loans Originated	1	7	52	52	43	6	0	161
	Applications Denied	0	7	8	17	11	2	0	45
	Denial Rate	0.0%	50.0%	13.3%	24.6%	20.4%	25.0%	%	21.8%
White	Loans Originated	25	207	580	553	424	119	0	1908
	Applications Denied	18	50	106	94	69	22	0	359
	Denial Rate	41.9%	19.5%	15.5%	14.5%	14.0%	15.6%	%	15.8%
Not Available	Loans Originated	7	22	129	147	131	48	0	484
	Applications Denied	11	10	33	35	32	7	0	128
	Denial Rate	61.1%	31.2%	20.4%	19.2%	19.6%	12.7%	%	20.9%
Not Applicable	Loans Originated	1	0	0	1	0	0	0	2
	Applications Denied	0	0	0	0	0	0	0	0
	Denial Rate	0.0%	%	%	0.0%	%	%	%	0.0%
Total	Loans Originated	68	344	1231	1332	1203	380	0	4,558
	Applications Denied	46	107	266	286	257	70	0	1,032
	Denial Rate	40.4%	23.7%	17.8%	17.7%	17.6%	15.6%	%	18.5%
Hispanic	Loans Originated	17	157	449	432	324	69	0	1448
	Applications Denied	14	46	87	70	58	13	0	288
	Denial Rate	45.2%	22.7%	16.2%	13.9%	15.2%	15.9%	%	16.6%
Non-Hispanic	Loans Originated	42	172	662	781	776	265	0	2698
	Applications Denied	20	51	151	183	164	52	0	621
	Denial Rate	32.3%	22.9%	18.6%	19.0%	17.4%	16.4%	%	18.7%

Table VI.9
Originated Owner-Occupied Loans by HAL Status

City of Carson
2008–2018 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
HAL	37	24	0	3	1	0	1	1	1	1	1	70
Other	245	381	404	333	469	438	375	493	537	493	320	4488
Total	282	405	404	336	470	438	376	494	538	494	321	4,558
Percent HAL	13.1%	5.9%	0.0%	0.9%	0.2%	0.0%	0.3%	0.2%	0.2%	0.2%	0.3%	1.5%

Table VI.10
Loans by Loan Purpose by HAL Status

City of Carson
2008–2018 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Home Purchase	HAL	37	24	0	3	1	0	1	1	1	1	1	70
	Other	245	381	404	333	469	438	375	493	537	493	320	4488
	Percent HAL	13.1%	5.9%	0.0%	0.9%	0.2%	0.0%	0.3%	0.2%	0.2%	0.2%	0.3%	1.5%
Home Improvement	HAL	8	3	0	0	3	3	2	2	1	3	8	33
	Other	75	53	29	32	52	37	61	70	133	143	86	771
	Percent HAL	9.6%	5.4%	0.0%	0.0%	5.5%	7.5%	3.2%	2.8%	0.7%	2.1%	8.5%	1.5%
Refinancing	HAL	57	17	1	4	7	5	7	1	7	4	5	115
	Other	549	632	731	678	1489	1245	825	1239	1597	1125	728	10838
	Percent HAL	9.4%	2.6%	0.1%	0.6%	0.5%	0.4%	0.8%	0.1%	0.4%	0.4%	0.7%	1.5%
Total	HAL	102	44	1	7	11	8	10	4	9	8	19	223
	Other	869	1066	1164	1043	2010	1720	1261	1802	2267	1761	1198	16161
	Percent HAL	10.5%	4.0%	0.1%	0.7%	0.5%	0.5%	0.8%	0.2%	0.4%	0.5%	1.6%	1.4%

Table VI.11
HALs Originated by Race of Borrower

City of Carson
2008–2018 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	0	0	nan	0	0	nan	0	0	0	0	0	0
Asian	3	3	nan	1	0	nan	1	0	0	1	0	9
Black	9	8	nan	0	0	nan	0	0	1	0	1	19
Pacific Islander	2	0	nan	0	0	nan	0	0	0	0	0	2
White	19	7	nan	1	1	nan	0	0	0	0	0	28
Not Available	4	6	nan	1	0	nan	0	1	0	0	0	12
Not Applicable	0	0	nan	0	0	nan	0	0	0	0	0	0
Total	37	24	0	3	1	0	1	1	1	1	1	70
Hispanic	15	4	nan	1	0	nan	0	0	0	0	0	1428
Non-Hispanic	19	15	nan	2	0	nan	1	0	1	1	1	2658

Table VI.12
Rate of HALs Originated by Race/Ethnicity of Borrower
City of Carson
2008–2018 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
American Indian	0.0%	%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	5.1%	3.4%	%	1.3%	0.0%	%	1.4%	0.0%	0.0%	0.9%	0.0%	0.9%
Black	12.7%	10.5%	%	0.0%	0.0%	%	0.0%	0.0%	0.9%	0.0%	1.5%	2.1%
Pacific Islander	18.2%	0.0%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
White	17.8%	3.8%	%	0.7%	0.4%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%
Not Available	13.3%	12.8%	%	2.6%	0.0%	%	0.0%	2.3%	0.0%	0.0%	0.0%	2.5%
Not Applicable	%	%	%	%	%	%	0.0%	%	%	0.0%	%	0.0%
Average	13.1%	5.9%	0.0%	0.9%	0.2%	0.0%	0.3%	0.2%	0.2%	0.2%	0.3%	1.5%
Hispanic	17.4%	2.8%	%	1.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%
Non-Hispanic	11.0%	6.6%	%	1.0%	0.0%	%	0.5%	0.0%	0.3%	0.3%	0.5%	1.5%

Table VI.13
Loans by HAL Status by Race/Ethnicity of Borrower
City of Carson
2008–2018 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	HAL	0	0	nan	0	0	nan	0	0	0	0	0	0
	Other	4	0	2	1	3	0	3	4	1	3	1	22
	Percent HAL	0.0%	%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Asian	HAL	3	3	nan	1	0	nan	1	0	0	1	0	9
	Other	56	84	88	74	87	118	68	121	137	115	88	1036
	Percent HAL	5.1%	3.4%	%	1.3%	0.0%	%	1.4%	0.0%	0.0%	0.9%	0.0%	0.9%
Black	HAL	9	8	nan	0	0	nan	0	0	1	0	1	19
	Other	62	68	83	68	78	54	80	111	116	119	66	905
	Percent HAL	12.7%	10.5%	%	0.0%	0.0%	%	0.0%	0.0%	0.9%	0.0%	1.5%	2.1%
Pacific Islander	HAL	2	0	nan	0	0	nan	0	0	0	0	0	2
	Other	9	11	19	17	25	14	24	10	12	15	3	159
	Percent HAL	18.2%	0.0%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
White	HAL	19	7	nan	1	1	nan	0	0	0	0	0	28
	Other	88	177	164	136	229	204	163	204	226	187	102	1880
	Percent HAL	17.8%	3.8%	%	0.7%	0.4%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%
Not Available	HAL	4	6	nan	1	0	nan	0	1	0	0	0	12
	Other	26	41	48	37	47	48	36	43	45	53	48	905
	Percent HAL	13.3%	12.8%	%	2.6%	0.0%	%	0.0%	2.3%	0.0%	0.0%	0.0%	2.5%
Not Applicable	HAL	0	0	nan	0	0	nan	0	0	0	0	0	0
	Other	0	0	0	0	0	0	1	0	0	1	0	2
	Percent HAL	%	%	%	%	%	%	0.0%	%	%	0.0%	%	0.0%
Total	HAL	37	24	0	3	1	0	1	1	1	1	1	70
	Other	245	381	404	333	469	438	375	493	537	493	320	4488
	Percent HAL	13.1%	5.9%	0.0%	0.9%	0.2%	0.0%	0.3%	0.2%	0.2%	0.2%	0.3%	1.5%
Hispanic	HAL	15	4	nan	1	0	nan	0	0	0	0	0	1428
	Other	71	141	127	102	184	162	136	144	160	129	72	20
	Percent HAL	17.4%	2.8%	%	1.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%
Non-Hispanic	HAL	19	15	nan	2	0	nan	1	0	1	1	1	2658
	Other	154	212	228	200	244	238	209	305	338	323	207	40
	Percent HAL	11.0%	6.6%	%	1.0%	0.0%	%	0.5%	0.0%	0.3%	0.3%	0.5%	1.5%

Table VI.14
Rates of HALs by Income of Borrower
City of Carson
2008–2018 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
\$30,000 or Below	50.0%	11.1%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	5.9%
\$30,001–\$50,000	11.1%	1.9%	%	2.6%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
\$50,001–\$75,000	10.2%	6.7%	%	1.4%	0.5%	%	1.2%	1.0%	0.0%	0.0%	0.0%	1.6%
\$75,001–\$100,000	11.7%	6.2%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%
\$100,00–\$150,000	16.4%	7.4%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.5%	0.8%	1.7%
Above \$150,000	9.4%	0.0%	%	0.0%	0.0%	%	0.0%	0.0%	1.4%	0.0%	0.0%	1.1%
Data Missing	%	%	%	%	%	%	%	%	%	%	%	%
Average	13.1%	5.9%	0.0%	0.9%	0.2%	0.0%	0.3%	0.2%	0.2%	0.2%	0.3%	1.5%

Table VI.15
Loans by HAL Status by Income of Borrower
City of Carson
2008–2018 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	HAL	3	1	nan	0	0	nan	0	0	0	0	0	4
	Other	3	8	6	6	5	4	2	4	2	5	19	64
	Percent HAL	50.0%	11.1%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	5.9%
\$30,001–\$50,000	HAL	2	1	nan	1	0	nan	0	0	0	0	0	4
	Other	16	53	37	37	66	41	23	20	29	14	4	340
	Percent HAL	11.1%	1.9%	%	2.6%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
\$50,001–\$75,000	HAL	6	9	nan	2	1	nan	1	1	0	0	0	20
	Other	53	125	151	142	192	157	84	101	96	71	39	1211
	Percent HAL	10.2%	6.7%	%	1.4%	0.5%	%	1.2%	1.0%	0.0%	0.0%	0.0%	1.6%
\$75,001–\$100,000	HAL	11	7	nan	0	0	nan	0	0	0	0	0	18
	Other	83	105	130	85	112	125	127	154	183	132	78	1314
	Percent HAL	11.7%	6.2%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%
\$100,001–\$150,000	HAL	12	6	nan	0	0	nan	0	0	0	1	1	20
	Other	61	75	61	53	81	99	110	161	157	199	126	1183
	Percent HAL	16.4%	7.4%	%	0.0%	0.0%	%	0.0%	0.0%	0.0%	0.5%	0.8%	1.7%
Above \$150,000	HAL	3	0	nan	0	0	nan	0	0	1	0	0	4
	Other	29	15	19	10	13	12	29	53	70	72	54	376
	Percent HAL	9.4%	0.0%	%	0.0%	0.0%	%	0.0%	0.0%	1.4%	0.0%	0.0%	1.1%
Data Missing	HAL	0	0	nan	0	0	nan	0	0	0	0	0	0
	Other	0	0	0	0	0	0	0	0	0	0	0	0
	Percent HAL	%	%	%	%	%	%	%	%	%	%	%	%
Total	Other	37	24	0	3	1	0	1	1	1	1	1	70
	HAL	245	381	404	333	469	438	375	493	537	493	320	4488
	Percent HAL	13.1%	5.9%	0.0%	0.9%	0.2%	0.0%	0.3%	0.2%	0.2%	0.2%	0.3%	1.5%

Albert Robles, Mayor, hereby certifies that this Analysis of Impediments to Fair Housing Choice for the City of Carson represents the City's conclusions about impediments to fair housing choice, as well as actions necessary to address any identified impediments.

Mayor_____

Date_____

DRAFT

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