

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	-
<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%

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.		

Source: SCAG Regional Housing Needs Assessment, 2021

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 ¹	Project Name	Location	Density			Status	Type
			(du/ac)	Acres	Units		
	Union South Bay	21521-21601 S Avalon Blvd	65	5.5	357	Completed (2020)	Market rate
DMU	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
	Evolve South Bay/MBK Homes	20330 S Main St	26	11.5	300	Under Construction	Multifamily
HDR	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
	Carson Upton/Brandywine	1007 E Victoria St	23	1.57	36	Approved	Townhomes
MDR	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

1. 2040 General Plan land use designation for Carson projects.

Source: Dyett & Bhatia, 2021

Table C-6: Neighboring Residential Project Density References

Type ¹	Project Name	Location	Density			Status	Notes
			(du/ac)	Acres	Units		
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 ¹	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

Designated Land Use	General Plan Permitted Density (du/ac)			Realistic Density (du/ac) ³
	Minimum	Maximum ¹	Expected Density (du/ac) ²	
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

<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>
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 I 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.

DRAFT

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			
<i>Under Construction</i>	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	0.0%		
<i>Approved</i>	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%			
<i>Under Review</i>	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.

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.

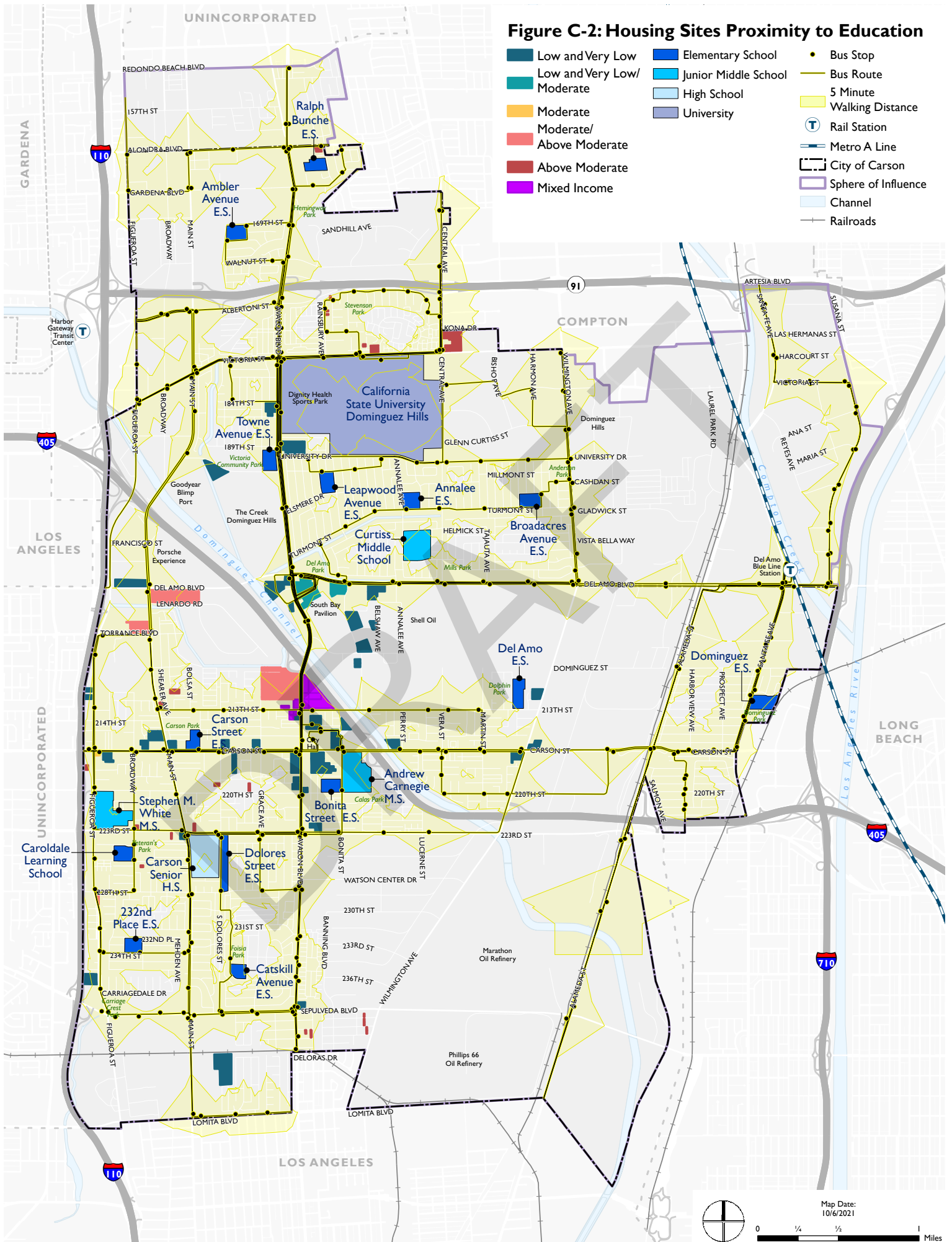
Civic buildings, educational facilities and medical centers are also present in Carson. Civic buildings are located throughout the city, with a concentration in Carson's Civic Center. The Civic Center includes City Hall, the Community Center, a sheriff's station, and a branch of the US Postal Service. 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



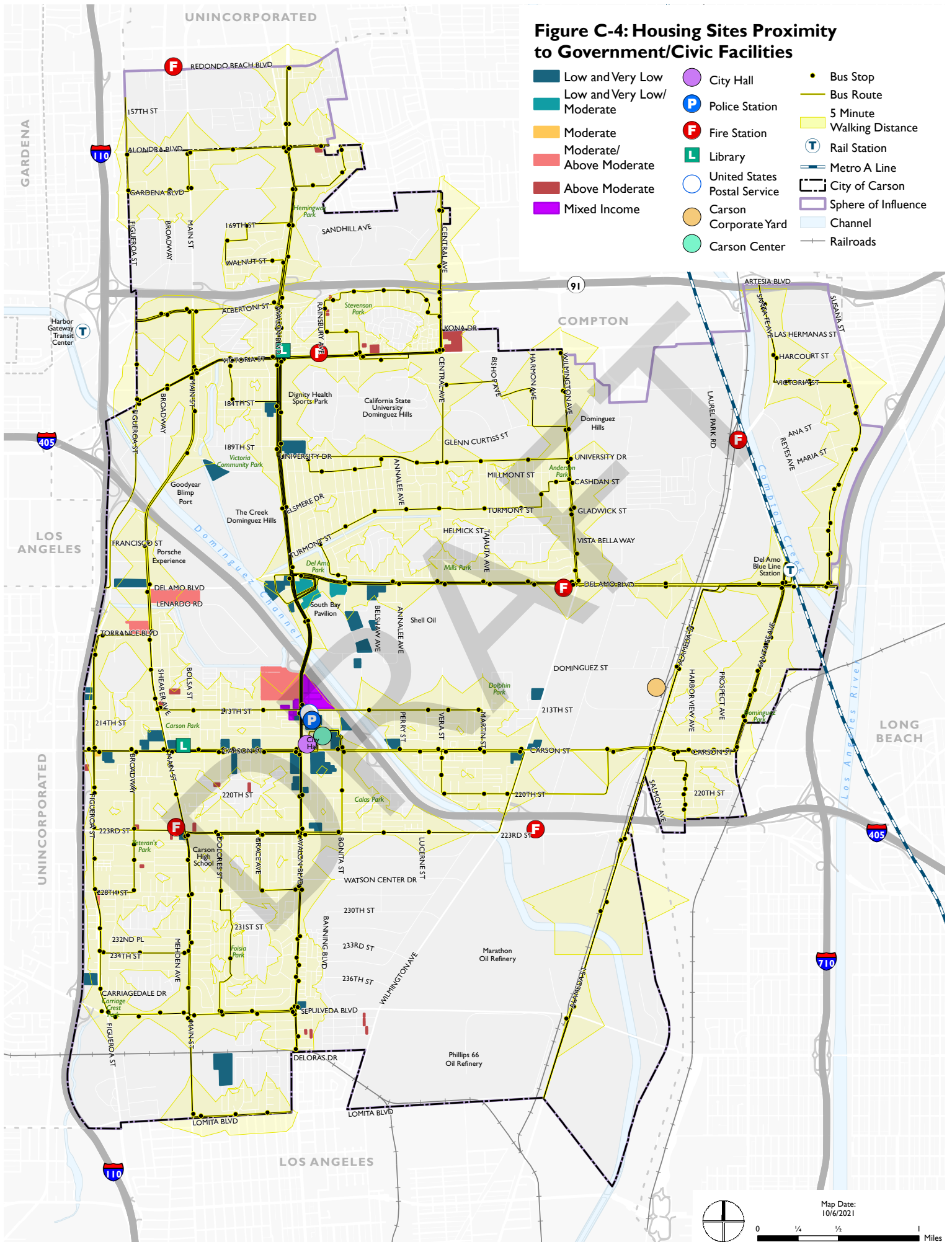
Source: County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021



Map Date:
10/6/2021

0 1/4 1/2 1 Miles

Figure C-4: Housing Sites Proximity to Government/Civic Facilities



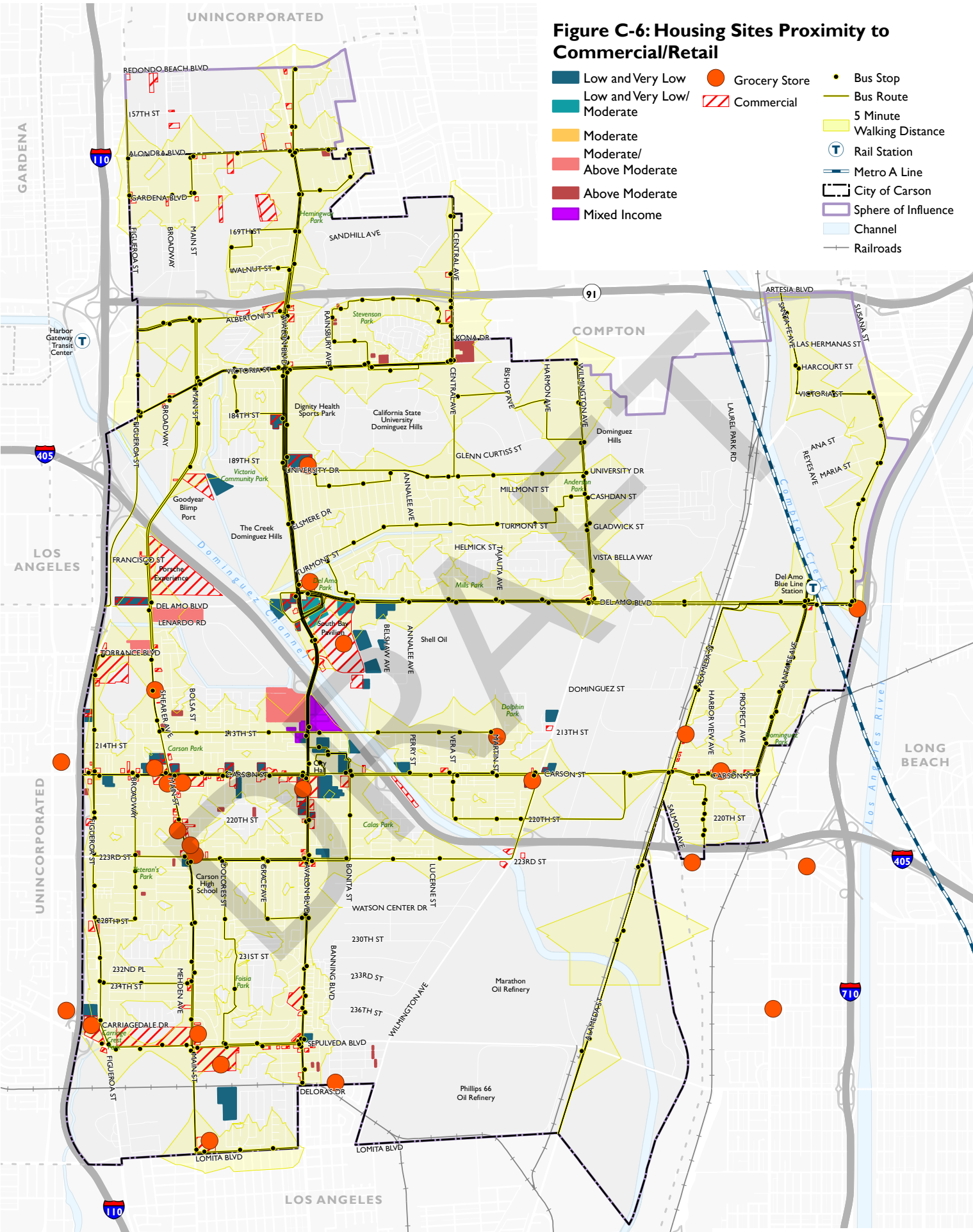
Source: County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021



Map Date:
10/6/2021

0 1/4 1/2 1 Miles

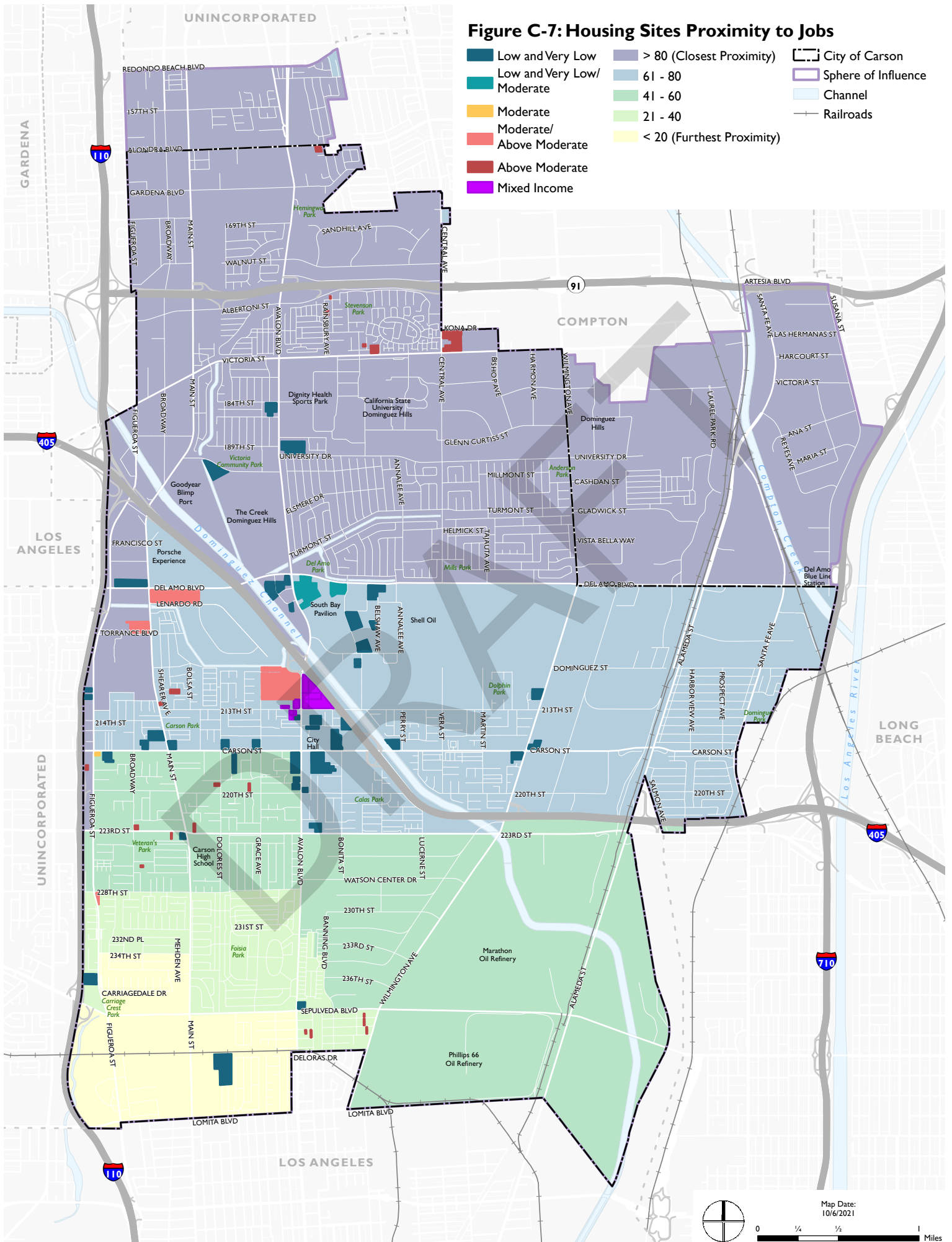
Figure C-6: Housing Sites Proximity to Commercial/Retail



Source: County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021

Figure C-7: Housing Sites Proximity to Jobs

- Low and Very Low
- Low and Very Low/
Moderate
- Moderate
- Moderate/
Above Moderate
- Above Moderate
- Mixed Income
- > 80 (Closest Proximity)
- 61 - 80
- 41 - 60
- 21 - 40
- < 20 (Furthest Proximity)
- City of Carson
- Sphere of Influence
- Channel
- Railroads



Source: HCD & TCAC Opportunity Areas Mapping Analysis, 2021; County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021

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

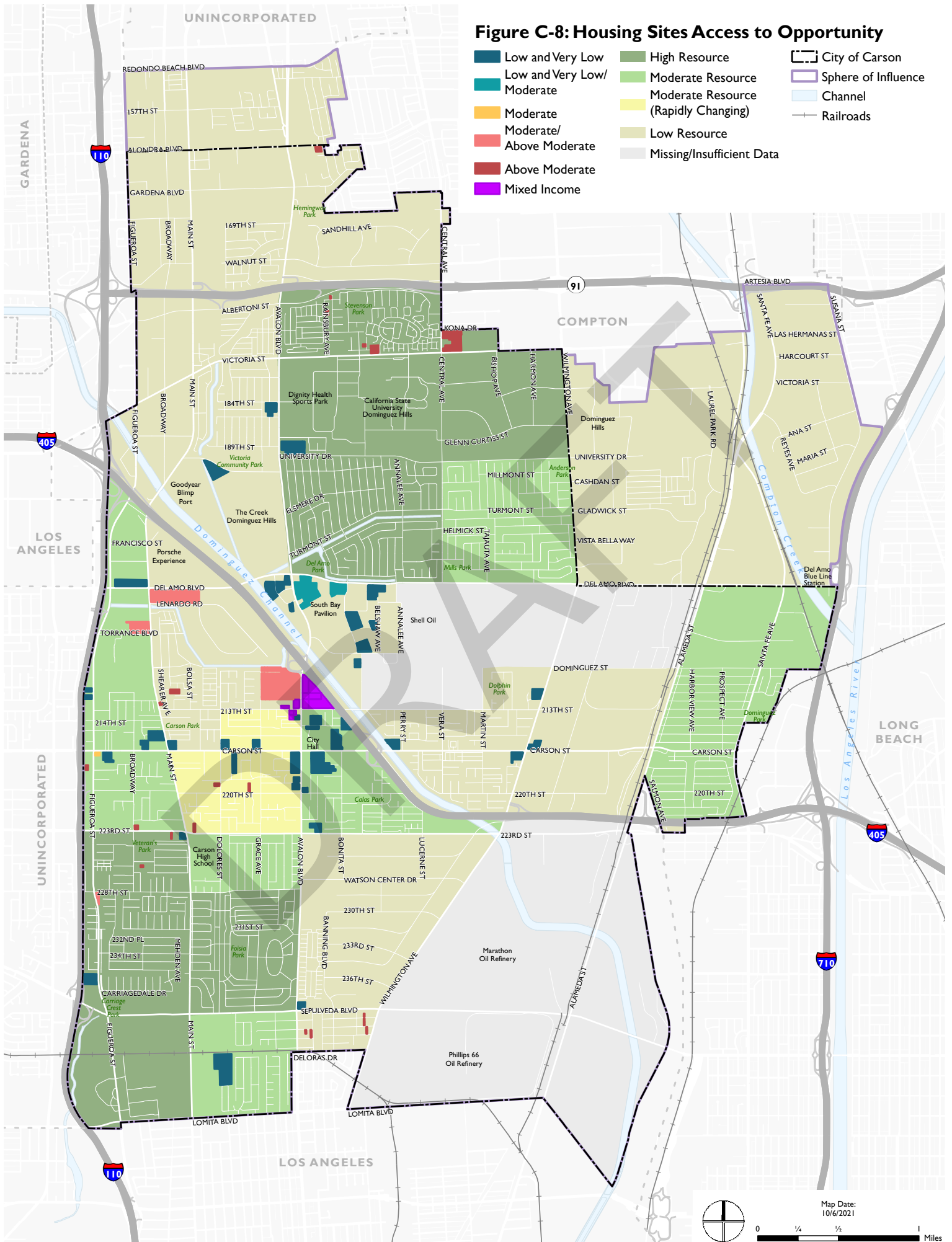
Several sites are located in low resource areas. However, many of the low resource areas identified are adjacent to Avalon Boulevard, which is targeted as a major corridor in the General Plan Update. Sites located near the city core are located in areas that have seen significant development activity 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



Source: HCD AFFH Data and Mapping Resources (HCD & TCAC Opportunity Areas Mapping Analysis, 2021); County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021

