APPENDIX E – Analysis of Impediments to Fair Housing Choice

2020 CITY OF CARSON

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE:

EQUAL HOUSING OPPORTUNITY

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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
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Pasadena, CA 91103
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Table of Contents

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.

Table I.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 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.

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.

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.

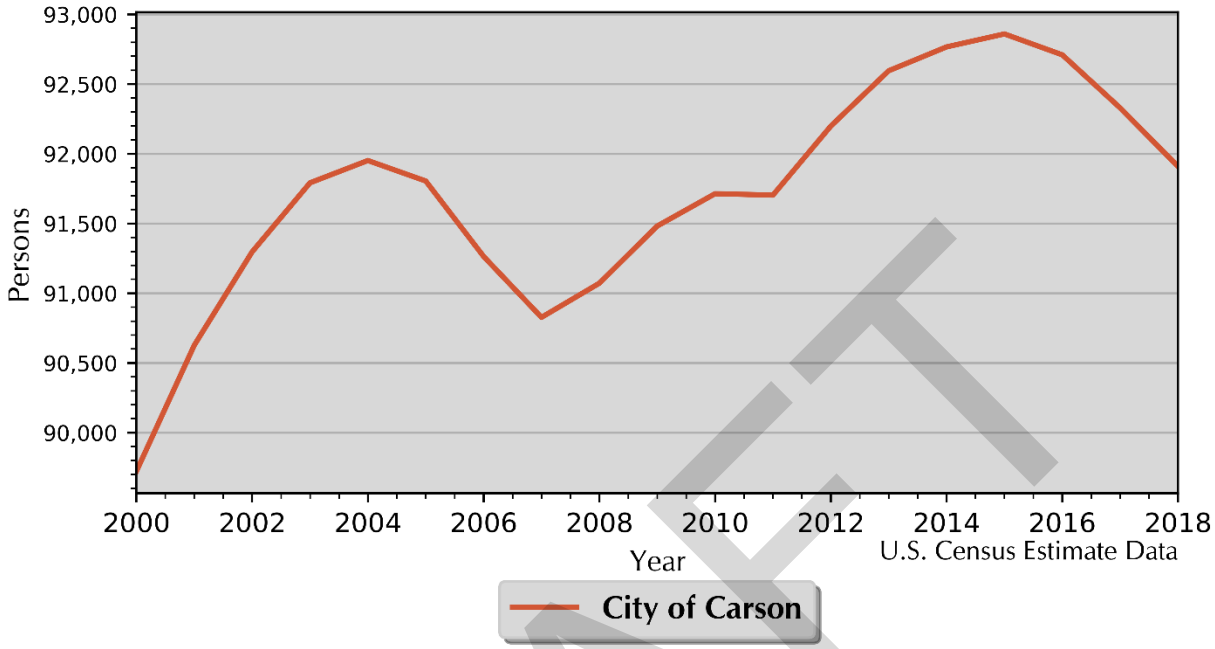
Table IV.1
Population Estimates
City of Carson
Census Population Estimates

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%

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.

Diagram IV.1
Population
City of Carson
2000 – 2018 Census Estimate Data



Population Estimates

Population by race and ethnicity through 2017 in 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%**

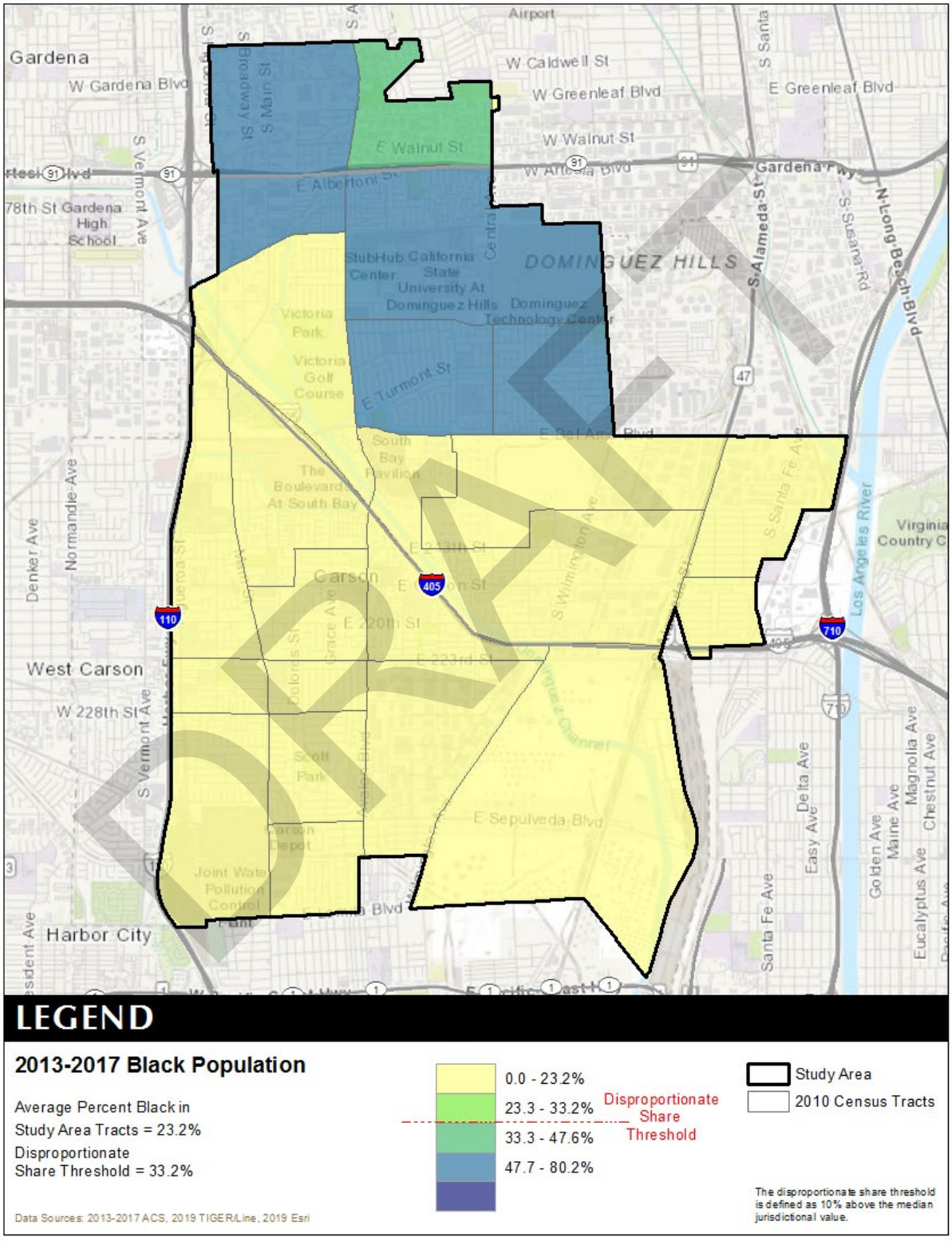
The geographic distribution of black residents is shown in Map IV.1. There are areas in the City that saw a disproportionate share of black residents in 2017. A disproportionate share exists when any one area has a concentration of a particular racial or ethnic group at least ten percentage points higher 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.

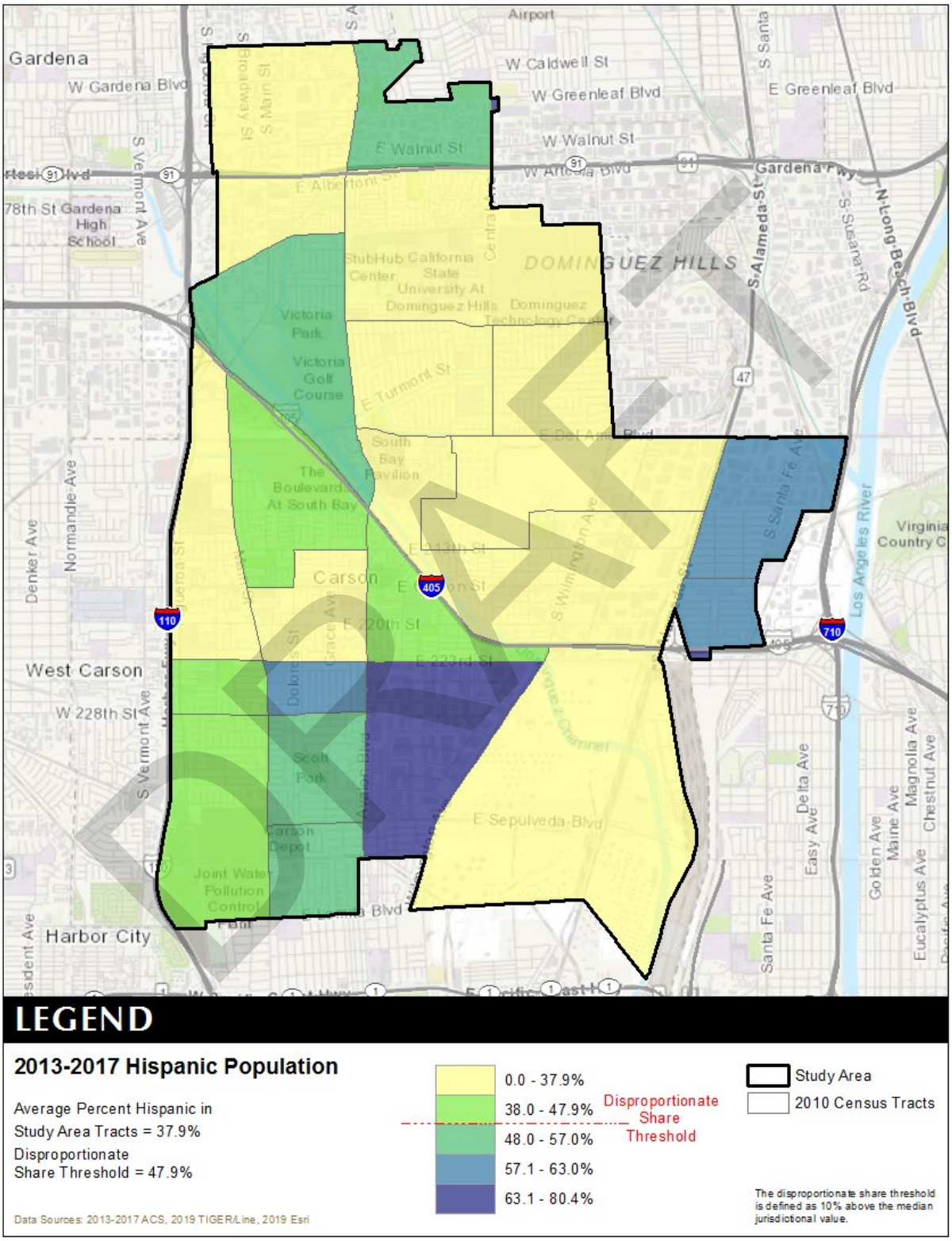
Table IV.4 Group Quarters Population City of Carson 2000 & 2010 Census SF1 Data					
Group Quarters Type	**2000 Census**		**2010 Census**		**% Change 00–10**
	Population	**% of Total**	**Population**	**% of Total**	
Institutionalized					
Correctional Institutions	0	0%	13	9.8%	inf%
Juvenile Facilities	.	.	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%**

Map IV.1
Black Population
City of Carson
2017 ACS, Tiglerine



Map IV.2
Hispanic Population
City of Carson
2017 ACS, Tiglerine



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_0
[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

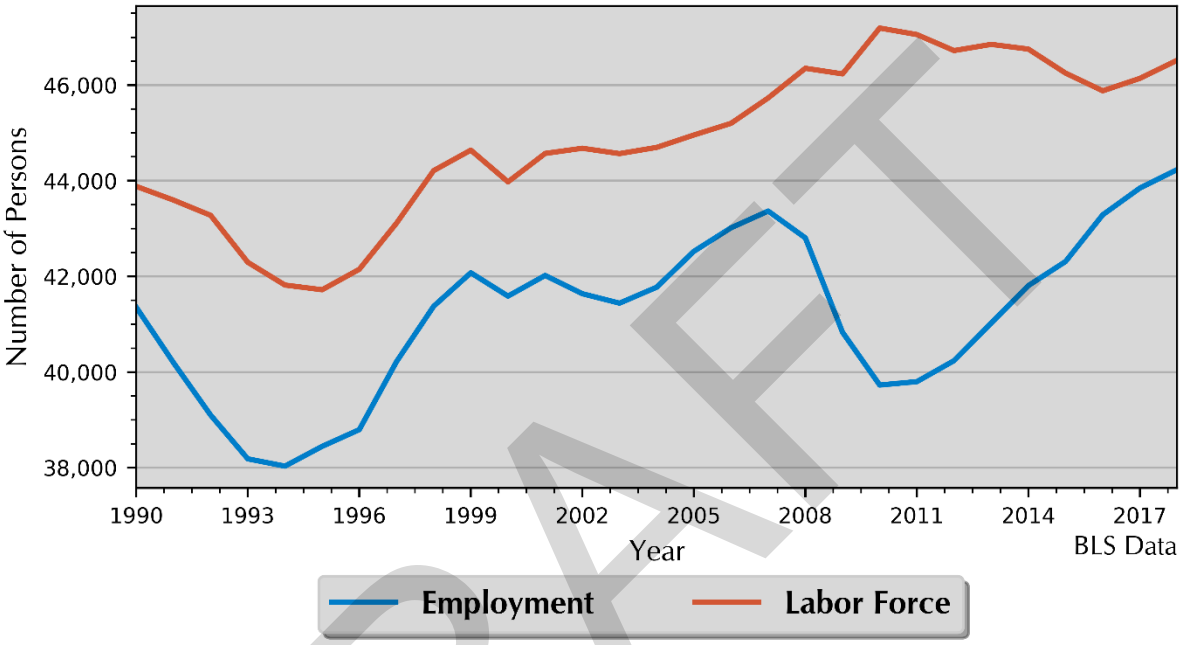
Table IV.10 shows the labor force statistics for City of Carson from 1990 to 2018. Over the entire series the lowest unemployment rate occurred in 2006 with a rate of 4.8 percent. The highest level of unemployment occurred during 2010, rising to a rate of 15.8 percent. This compared to a statewide low 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.

Table IV.10
Labor Force Statistics
City of Carson
1990 - 2018 BLS Data

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.

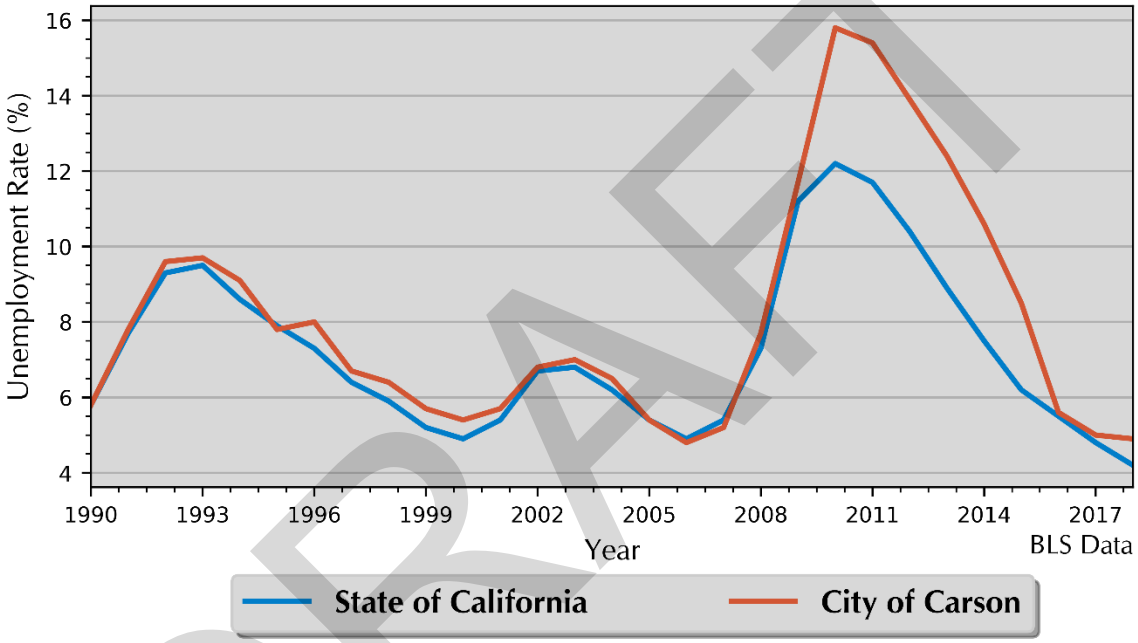
Diagram IV.2
Employment and Labor Force
City of Carson
1990 – 2017 BLS Data



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.

Diagram IV.3
Annual Unemployment Rate
City of Carson
1990 – 2017 BLS Data



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.4
Real Average Earnings Per Job
Los Angeles County
BEA Data 1990 - 2017

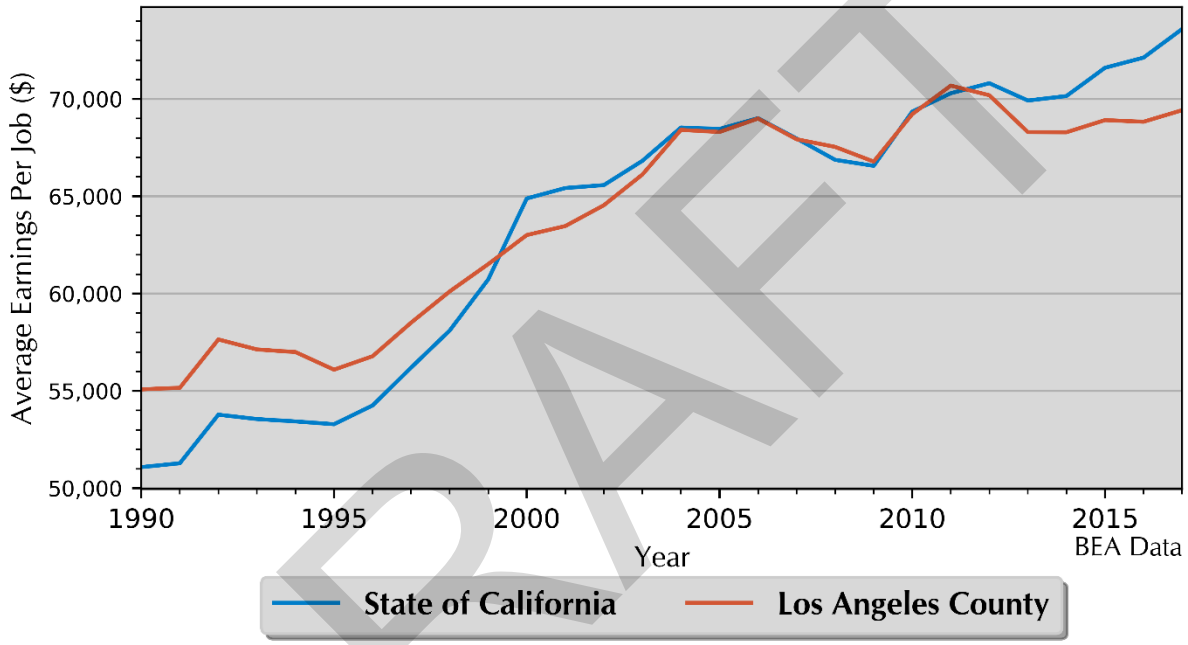
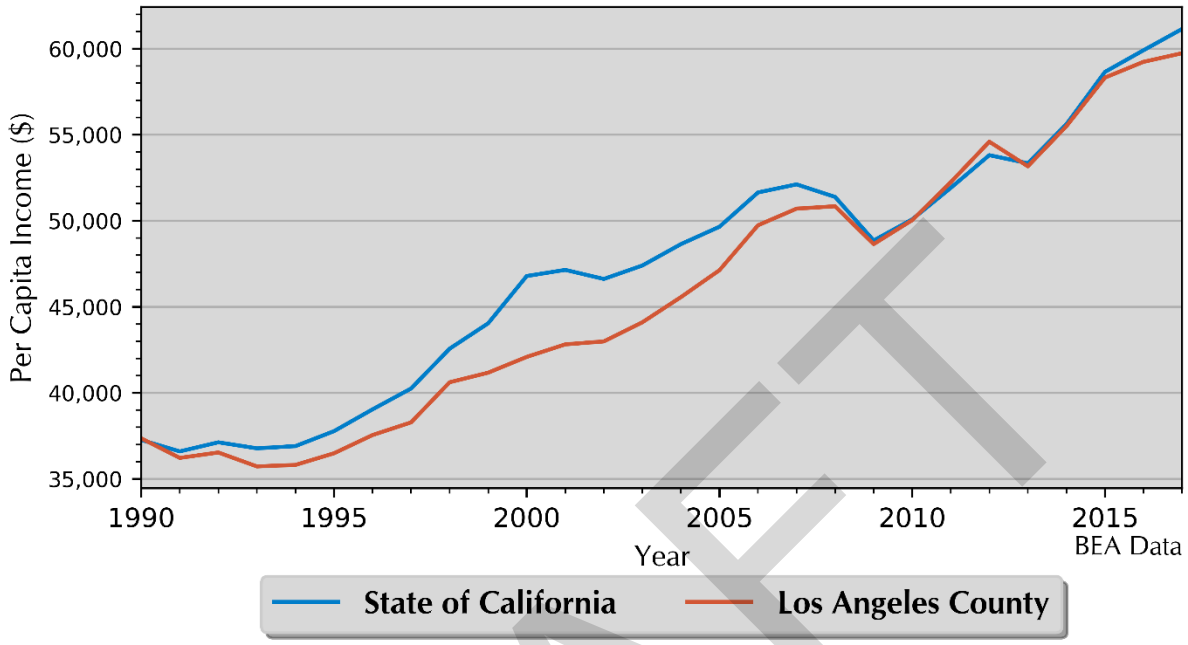


Diagram IV.5 shows real per capita income (which is calculated by dividing total personal income from all sources by population) for Los Angeles County from 1990 to 2017. Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Over 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.

Table IV.11
Poverty by Age
City of Carson
2000 Census SF3 & 2017 Five-Year ACS Data

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

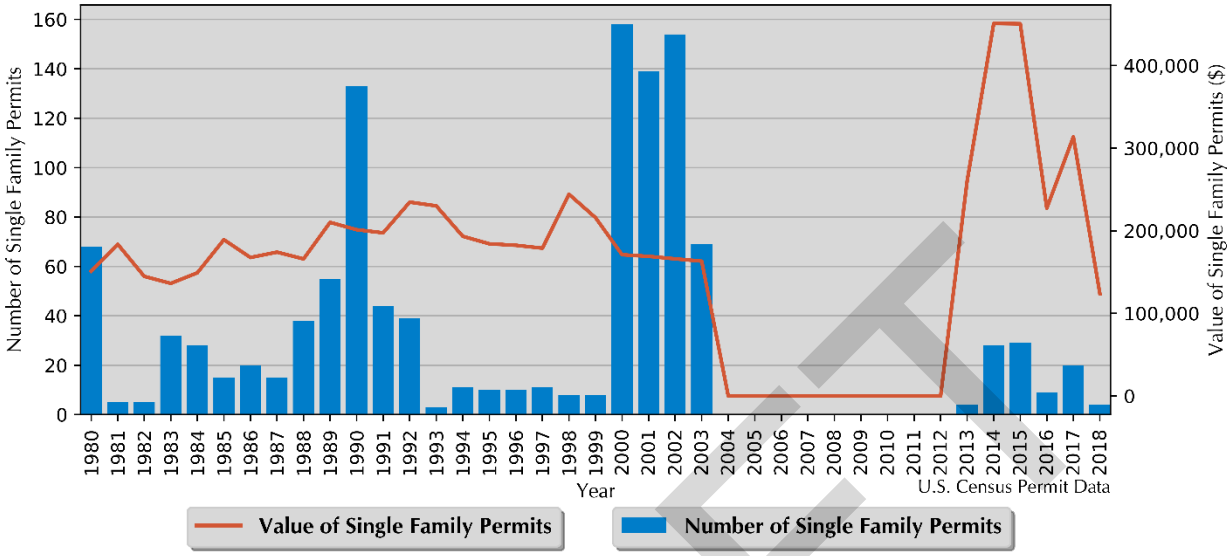
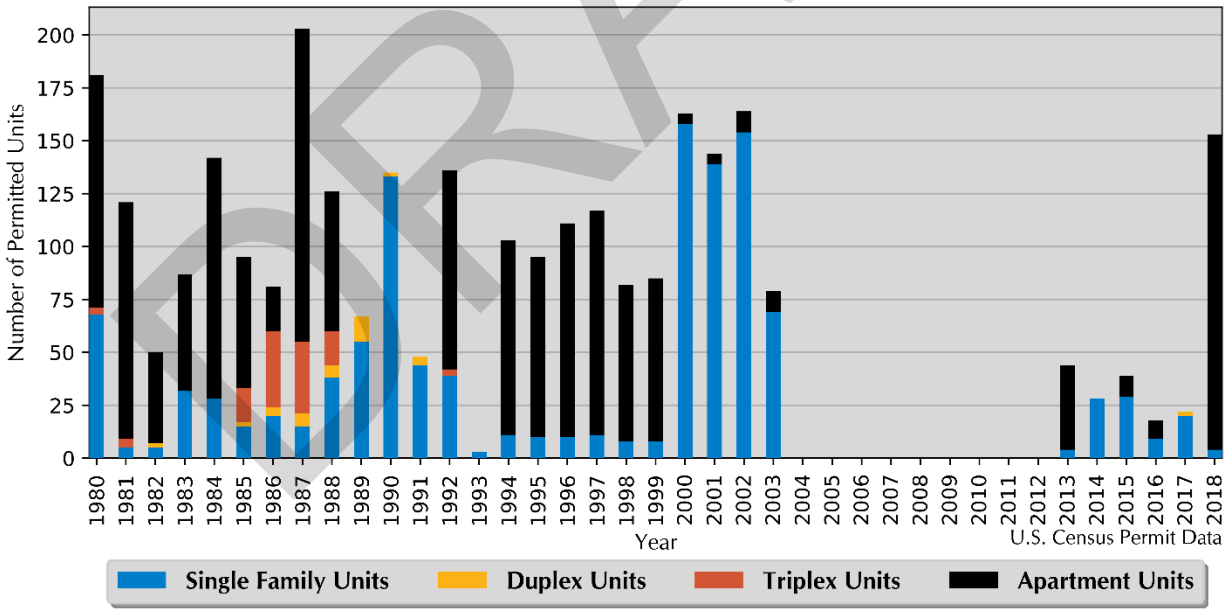


Diagram IV.7
Total Permits by Unit Type
City of Carson
Census Bureau Data, 1980–2017



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 Present	1,761	26.9%	1,820	25.5%
Owner-Occupied	1,259	71.5%	1,191	65.4%
Renter-Occupied	502	28.5%	629	34.6%
Female Householder, No Spouse Present	4,787	73.1%	5,083	69.3%
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 2000.

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 jth 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

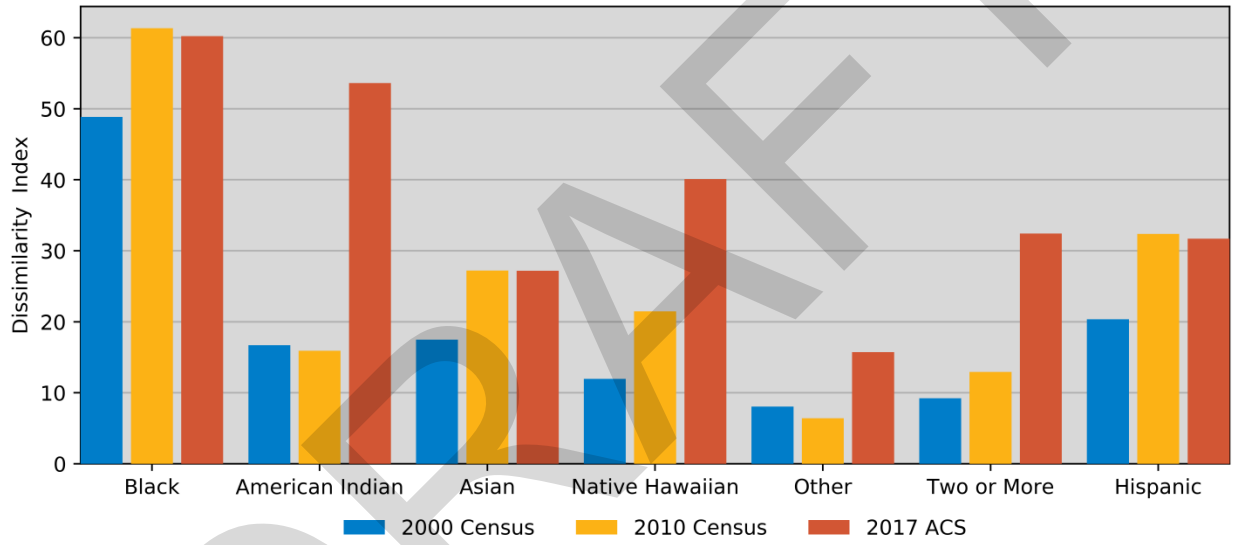
[9] Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

[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.

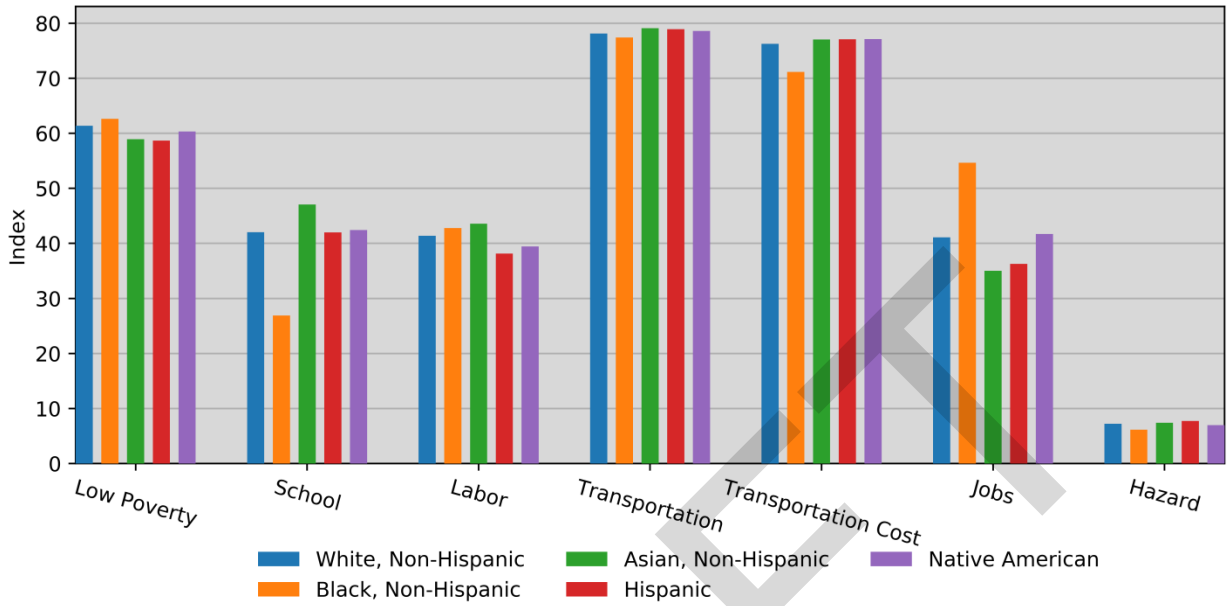
Areas of opportunity are physical places; areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas 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

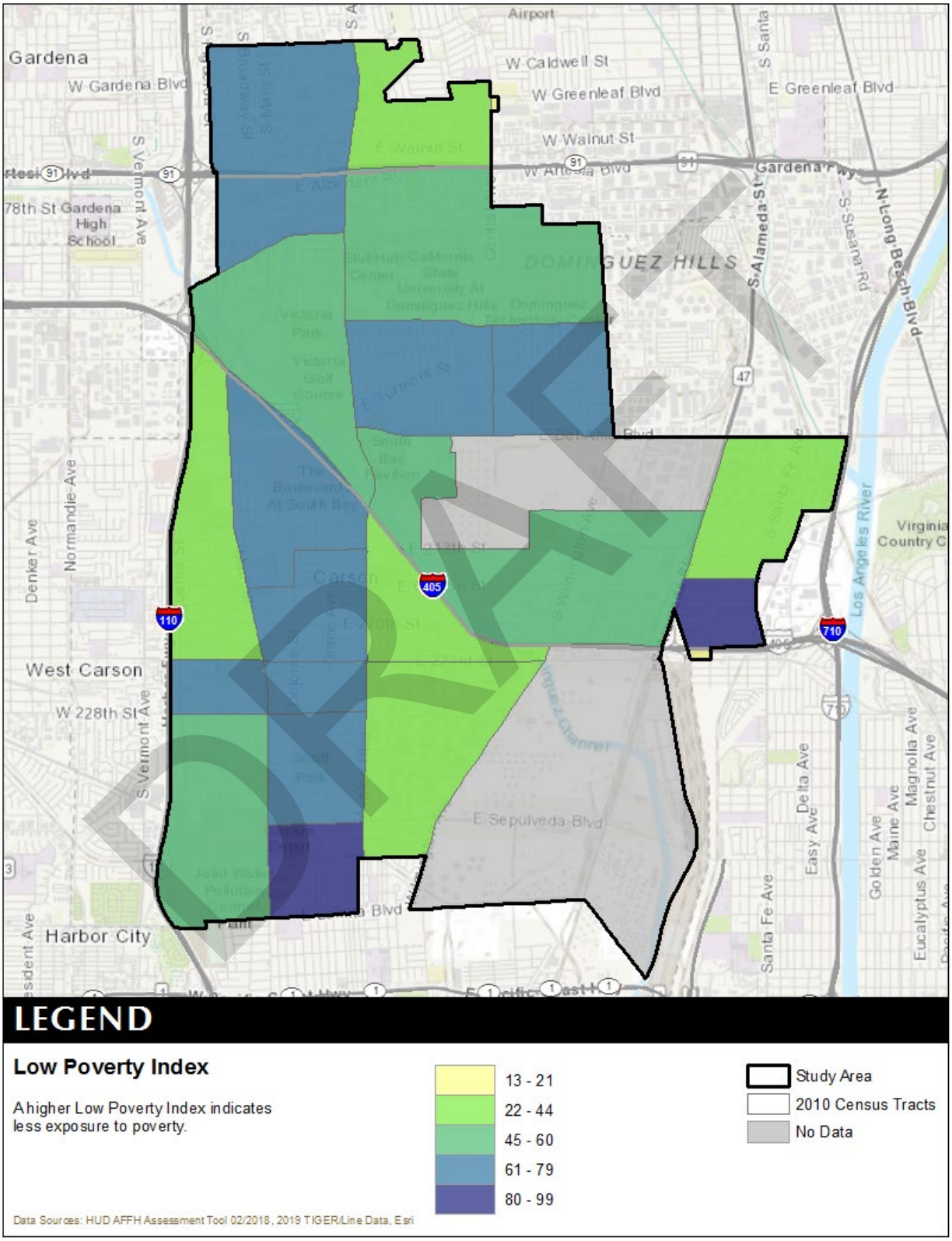


LOW POVERTY INDEX

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



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.

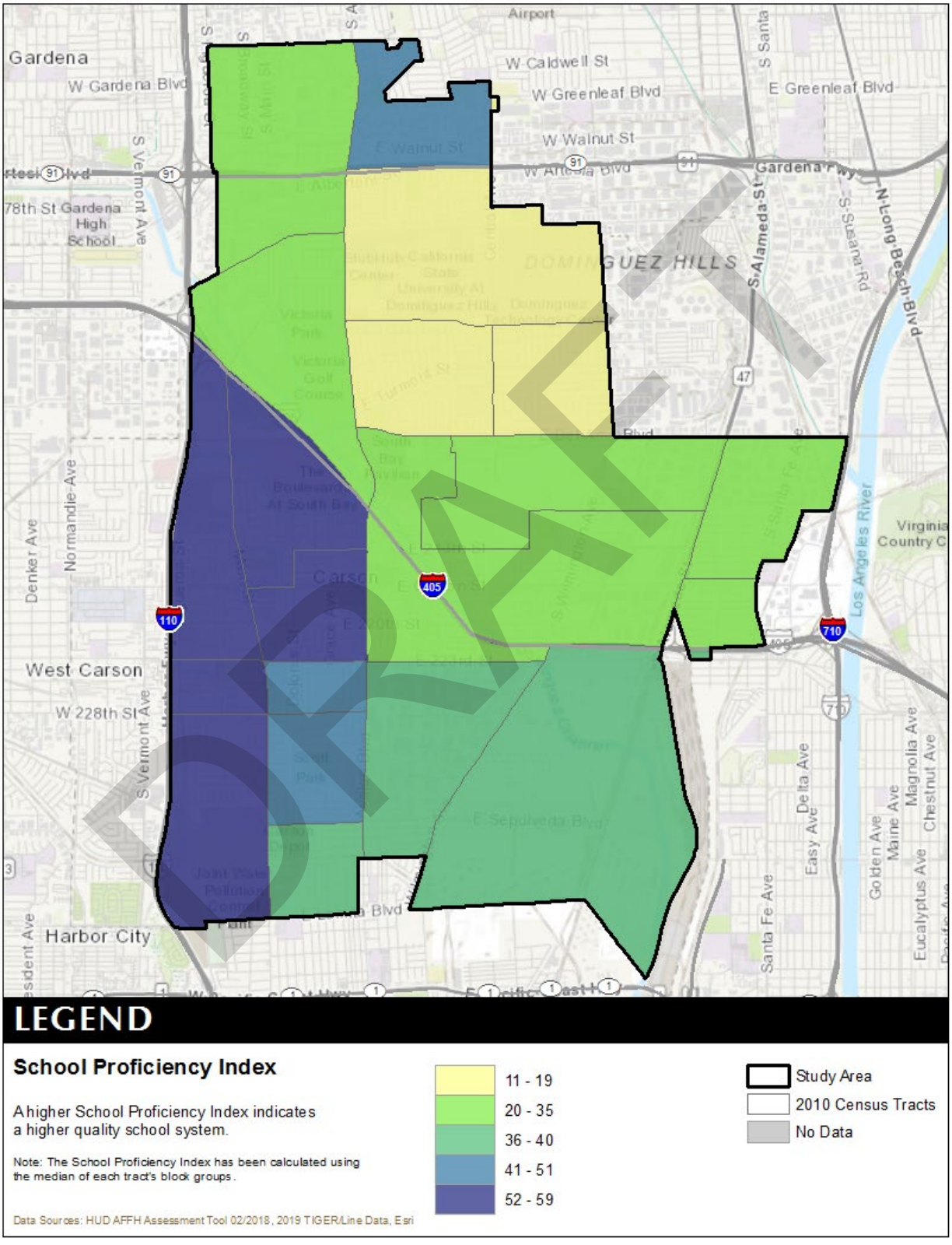
JOBS PROXIMITY INDEX

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.

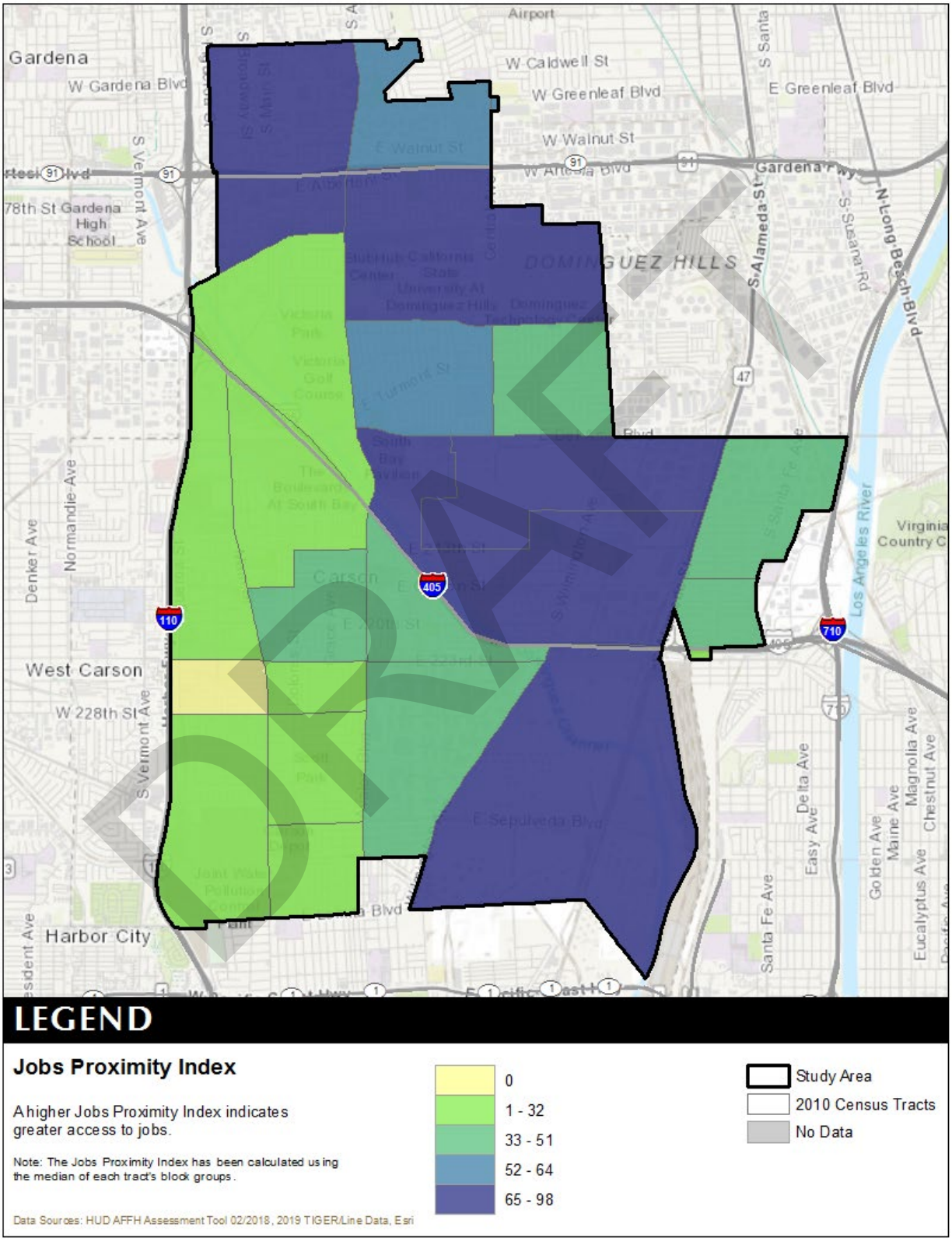
Note: The School Proficiency Index has been calculated using the median of each tract's block groups.

Data Sources: HUD AFFH Assessment Tool 02/2018, 2019 TIGER/Line Data, Esri

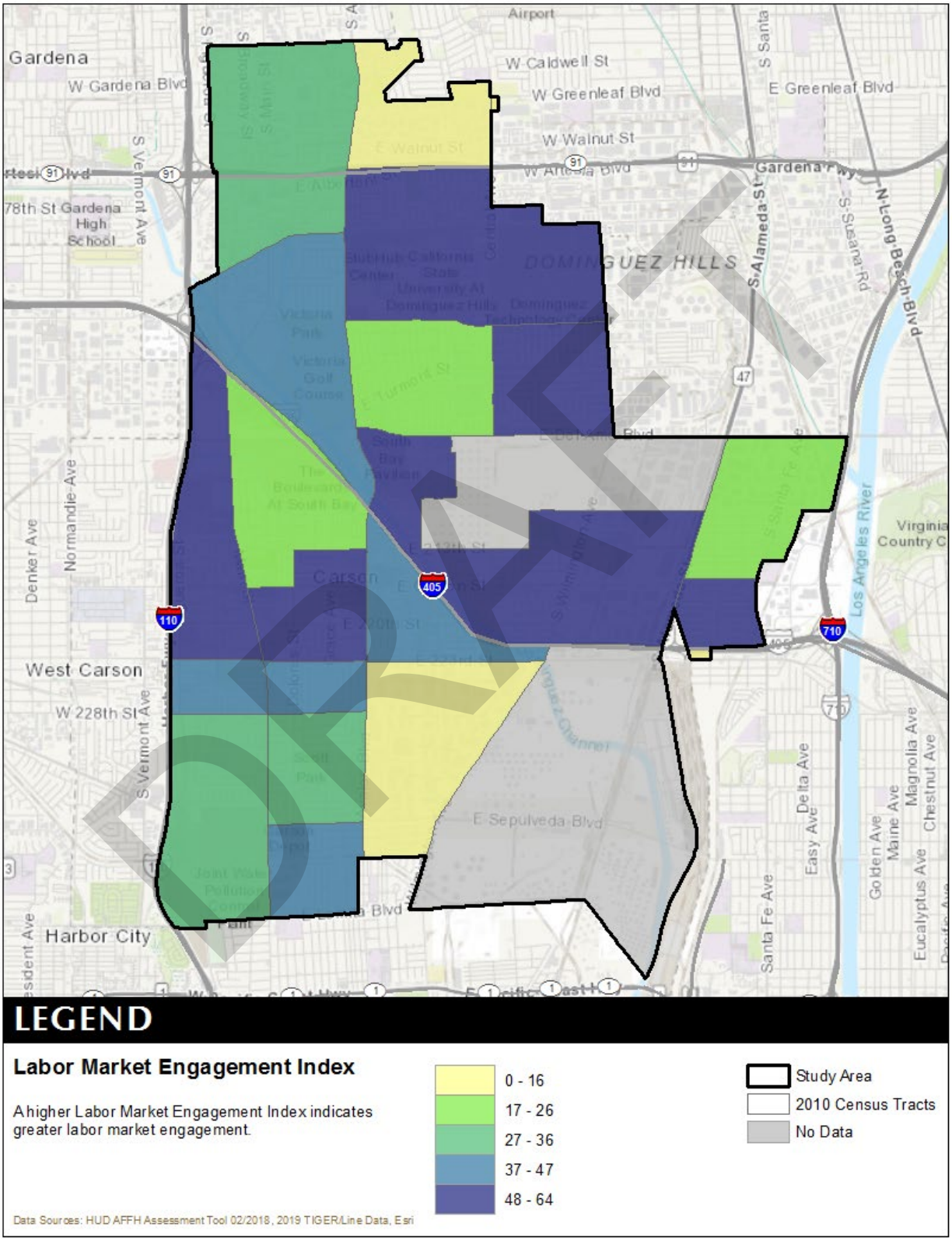
- 11 - 19
- 20 - 35
- 36 - 40
- 41 - 51
- 52 - 59

- Study Area
- 2010 Census Tracts
- No Data

Map IV.5
Job Proximity
City of Carson
HUD AFFH Database



Map IV.6
Labor Market Engagement
City of Carson
HUD AFFH Database



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

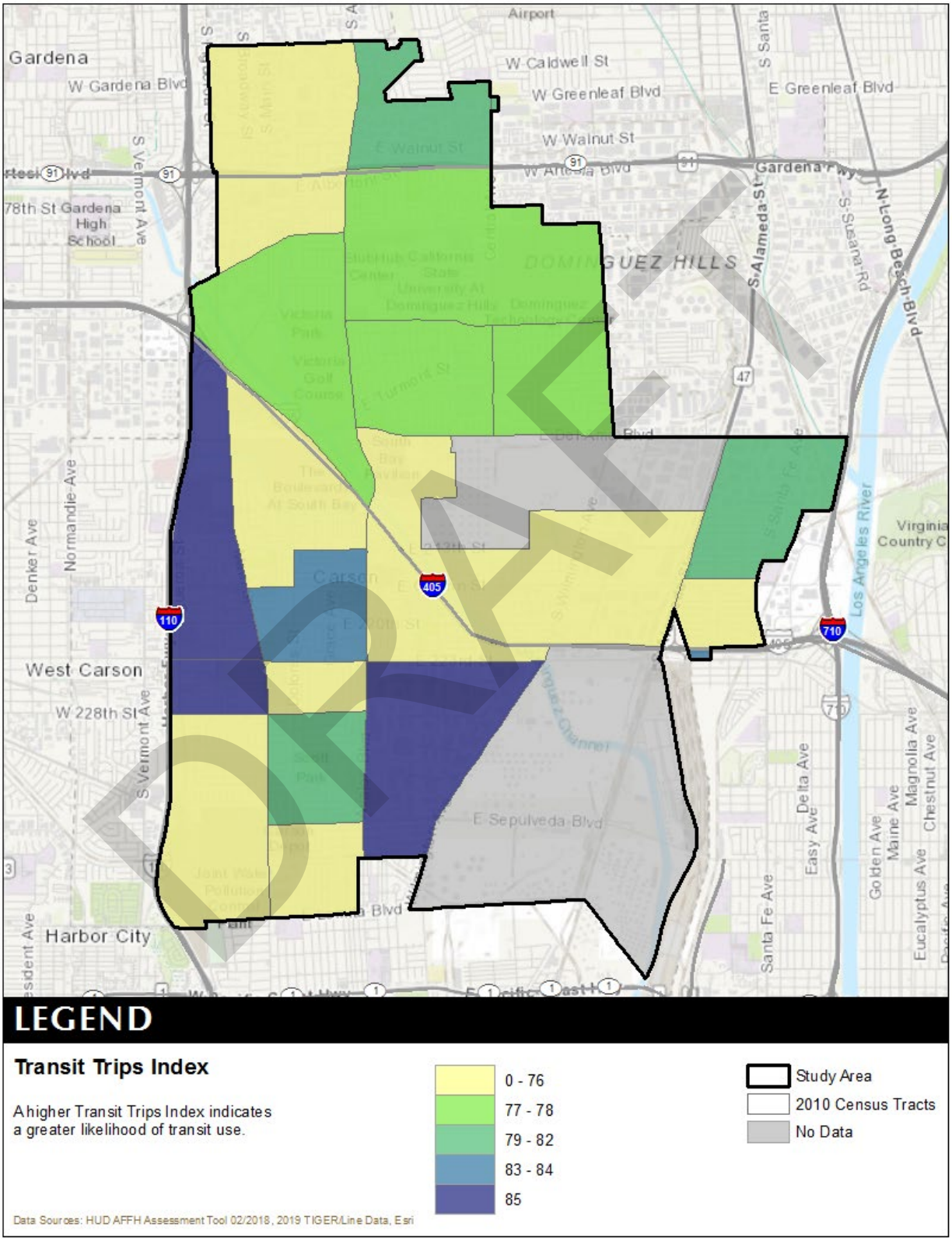
The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs saw a similar pattern as with Transit Trips; the highest transportation cost index ratings were in the western parts of the City.

ENVIRONMENTAL HEALTH INDEX

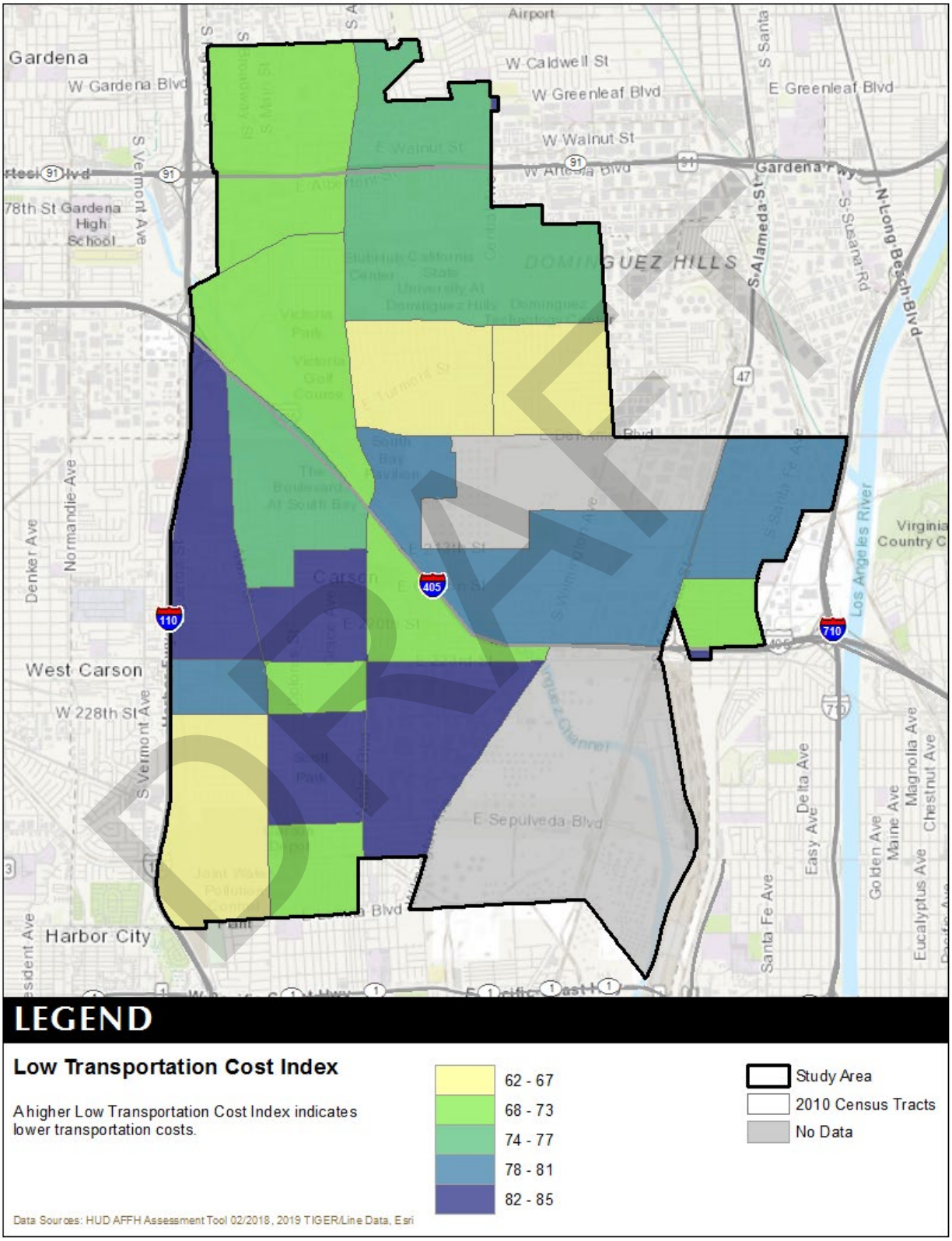
The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

The Environmental Health Index varied widely in the City, with the areas in southern Carson seeing the lowest ratings.

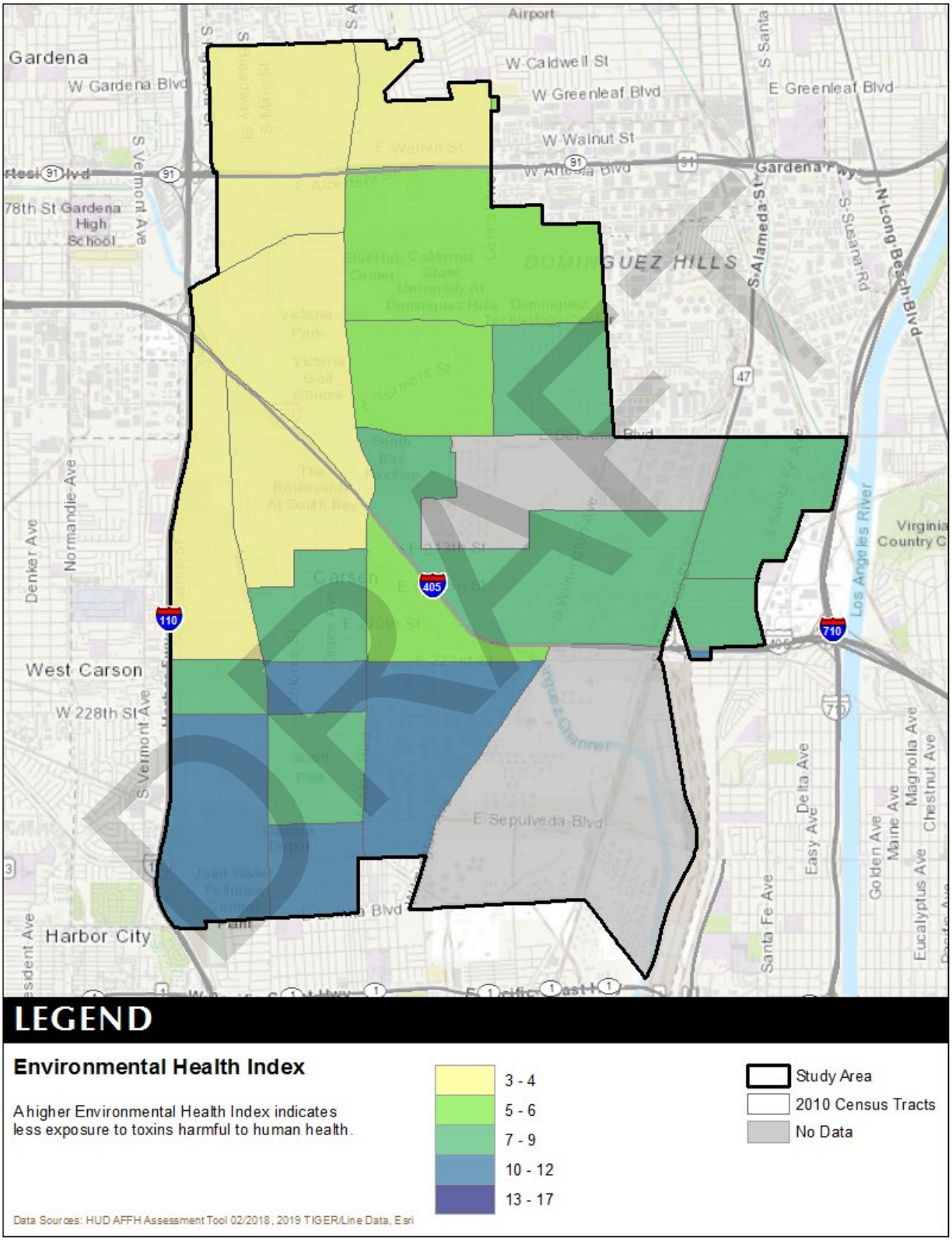
Map IV.7
Transit Trips
City of Carson
HUD AFFH Database



Map IV.8
Transportation Cost
City of Carson
HUD AFFH Database



Map IV.9
Environmental Health
City of Carson
HUD AFFH Database



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

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 0.3 percent of 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

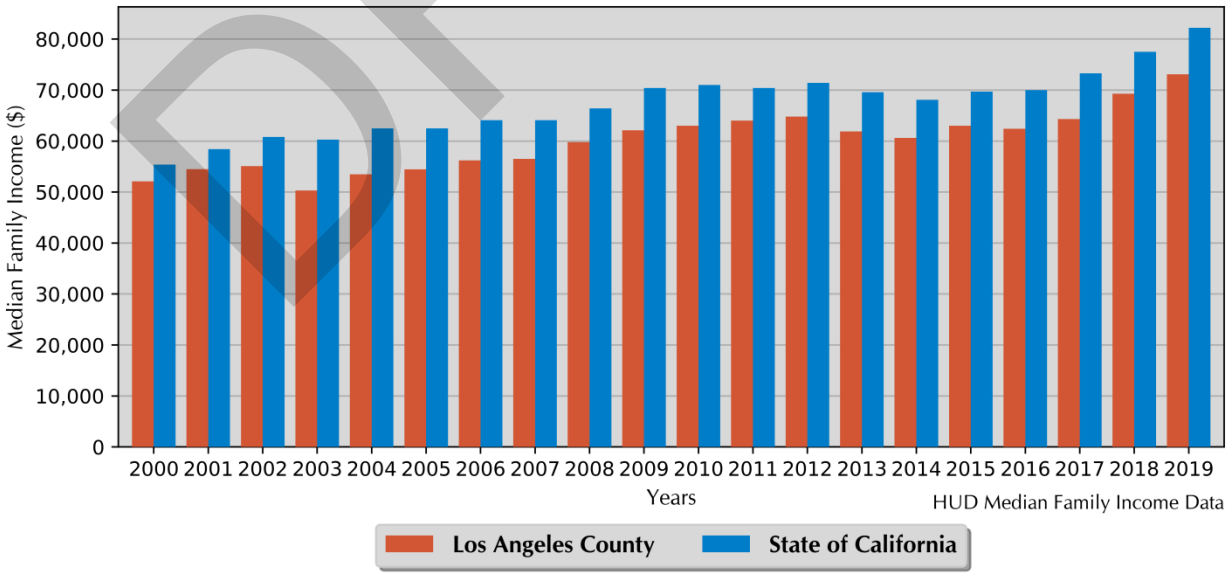
Housing Problems by Income

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.

Table IV.25
Median Family Income
Los Angeles County
2000–2019 HUD MFI

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

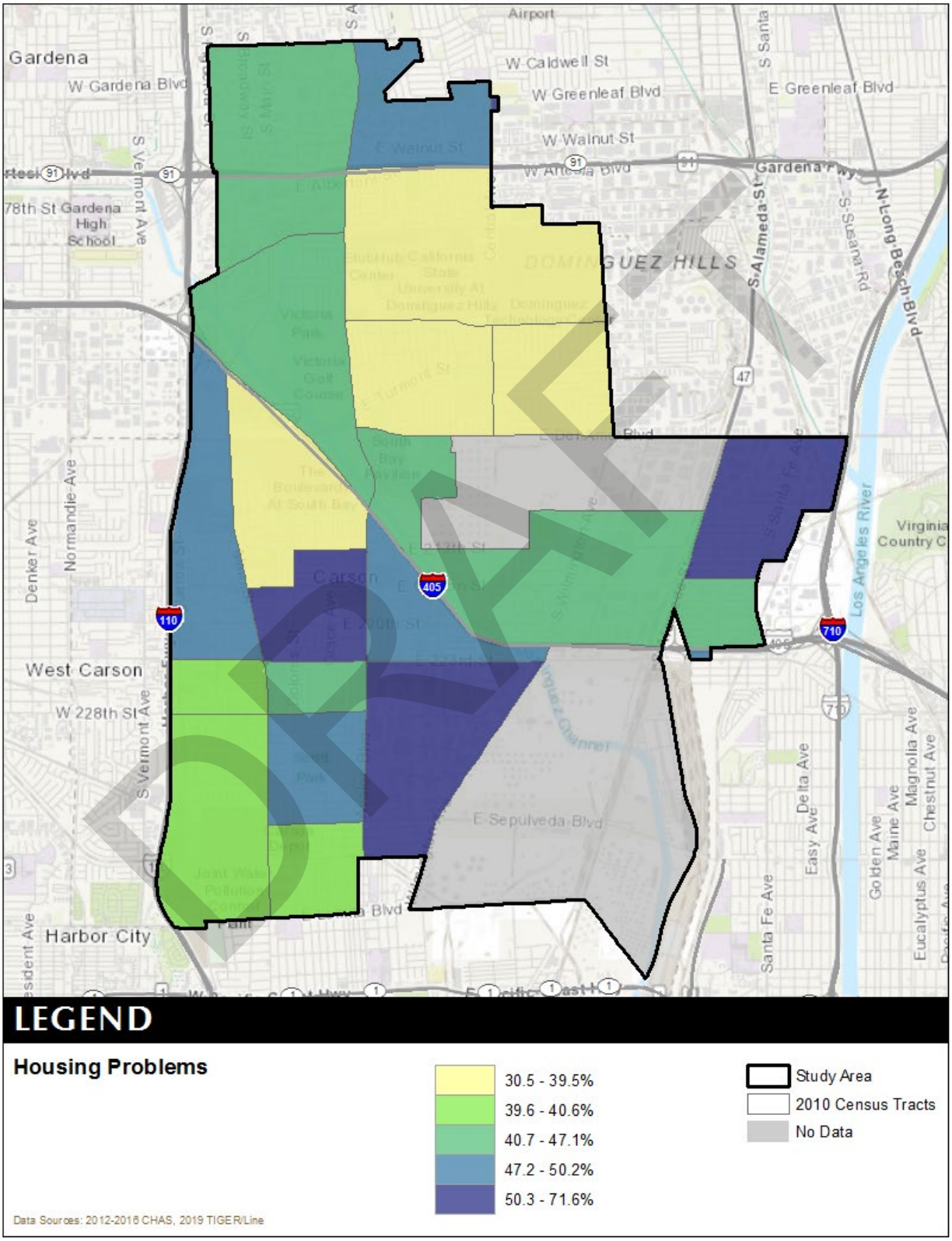
Housing Problem	$0 to $21,930	$21,931 to $36,550	$36,551 to $58,480	$58,481 to $73,100	Above $73,100	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	0%	0%	27.3%	0%	28.6%	18.7%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	14.3%	40.0%	55.6%	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 that 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 that 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 that 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 that 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 that 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



ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975, permanently authorizing the law in 1988[11]. 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

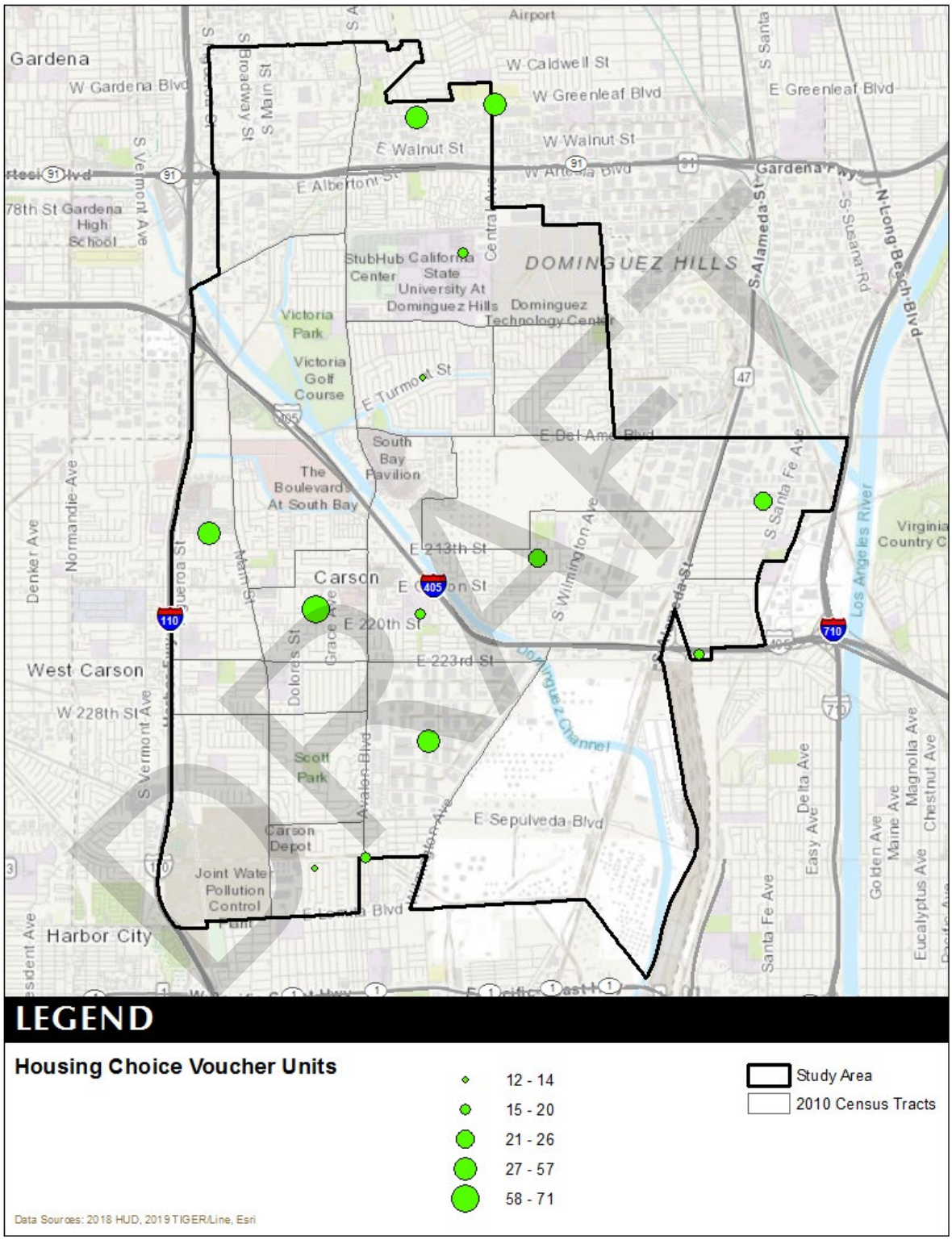
Program	Total Units	Total Disabled Units
Public Housing		
Project Based Section 8		
Other HUD Multifamily		
Housing Choice Vouchers	333	82
Total	**333**	**82**

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.

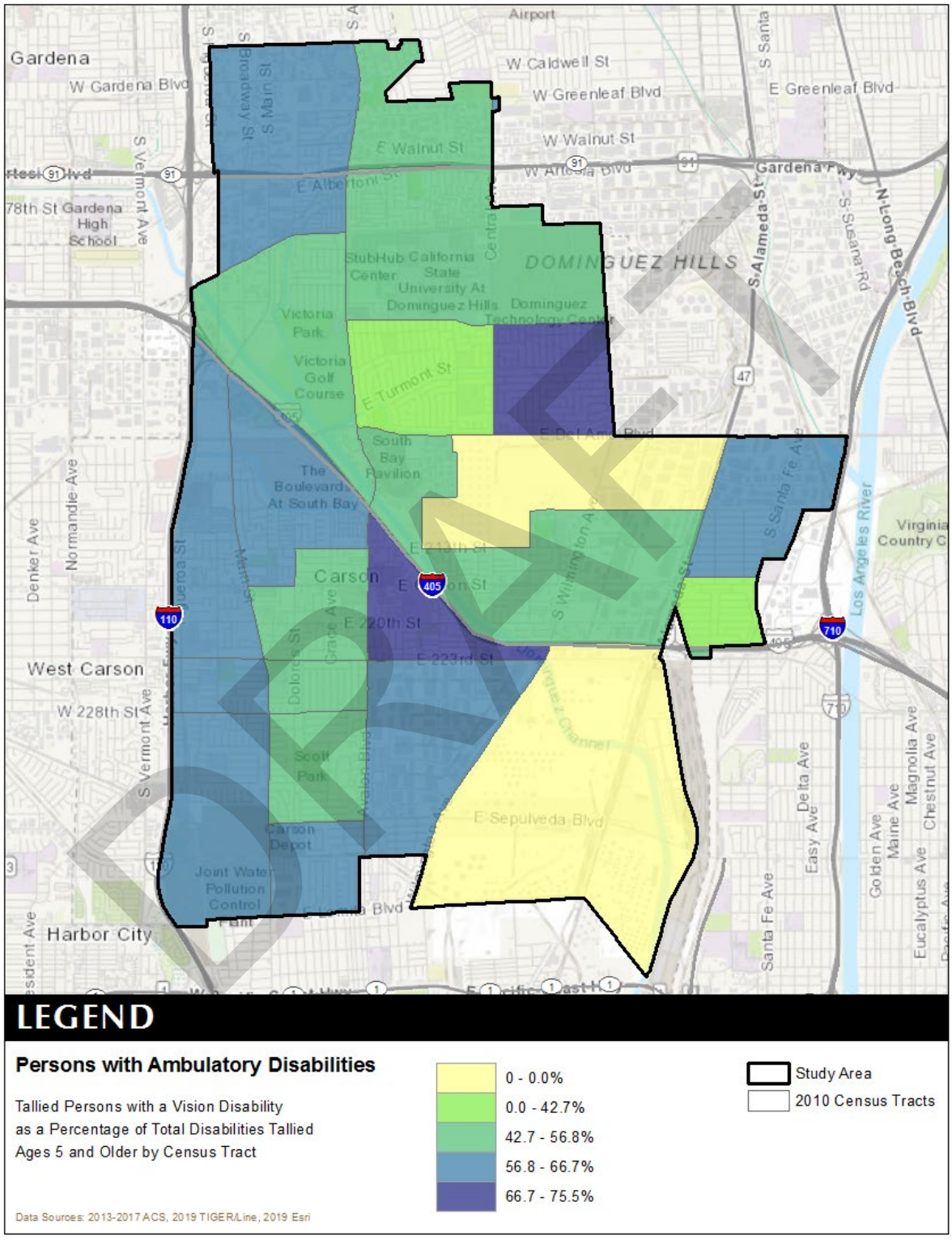
Table IV.49
Residents with Disabilities by Subsidized Housing Type
City of Carson
HUD AFFH Raw Database

Program	Total Units	Total Disabled Units
Public Housing		
Project Based Section 8		
Other HUD Multifamily		
Housing Choice Vouchers	333	82
Total	**333**	**82**

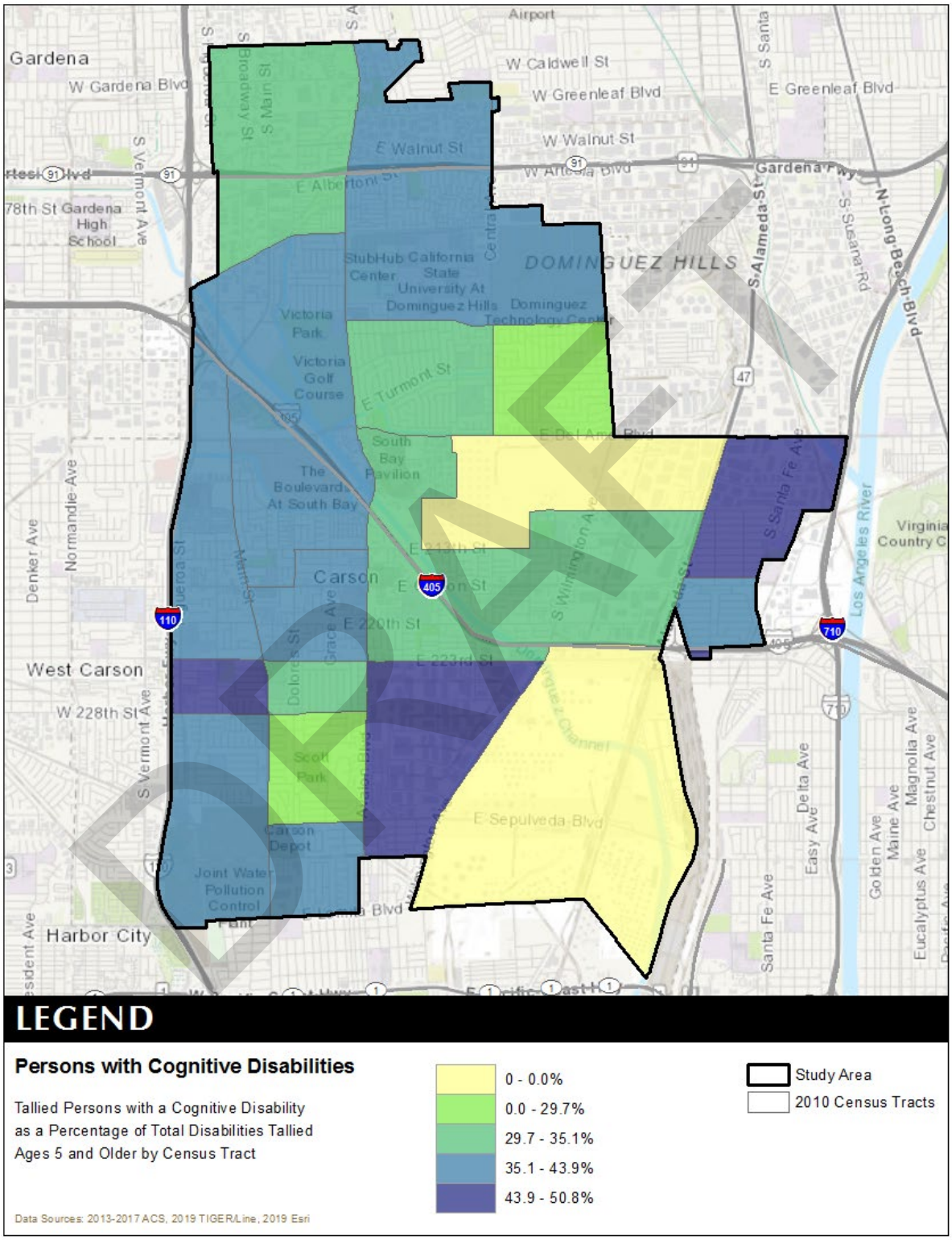
(As was noted earlier, updated information from the Housing Authority of the County of Los Angeles indicates 272 Housing Choice Vouchers in use in Carson as of February 2020, of which 142 are being utilized by disabled residents, however, Table IV.49 is based on HUD's AFFH database.)

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.

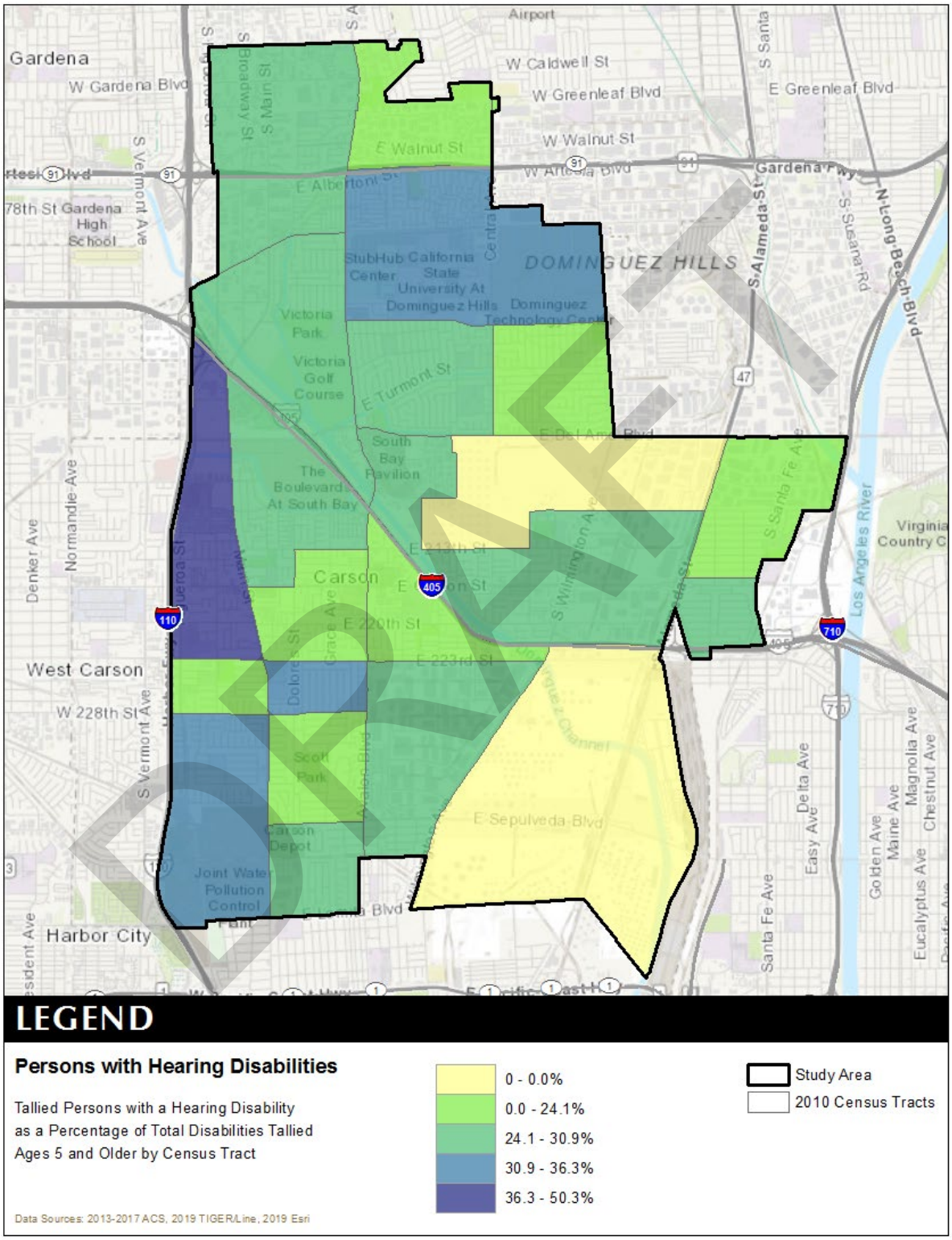
Map IV.9
Persons with Ambulatory Disabilities
City of Carson
2017 ACS, 2017 Tigerline, HUD AFFH Tool



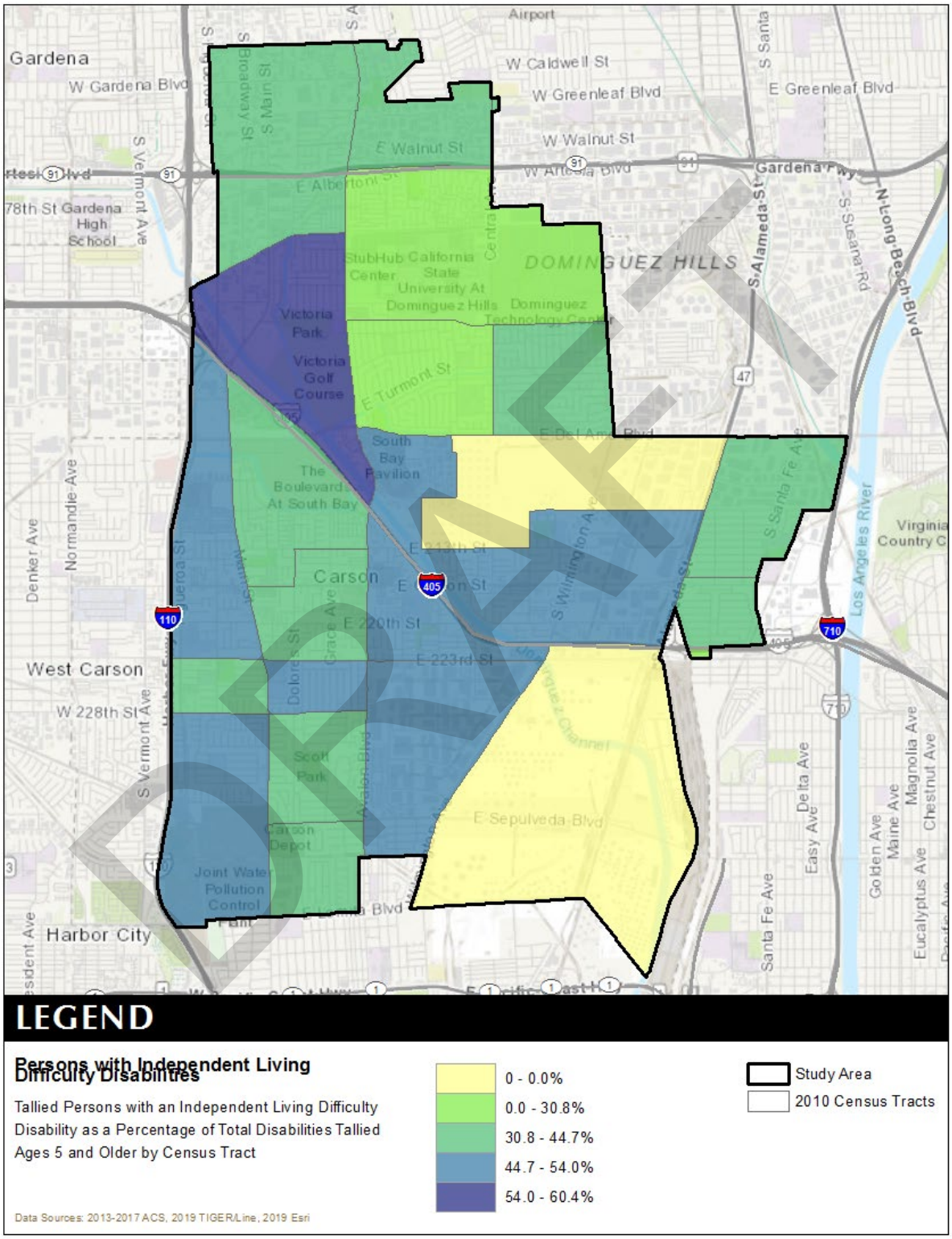
Map IV.10
Persons with Cognitive Disabilities
City of Carson
2017 ACS, 2017 Tigerline, HUD AFFH Tool



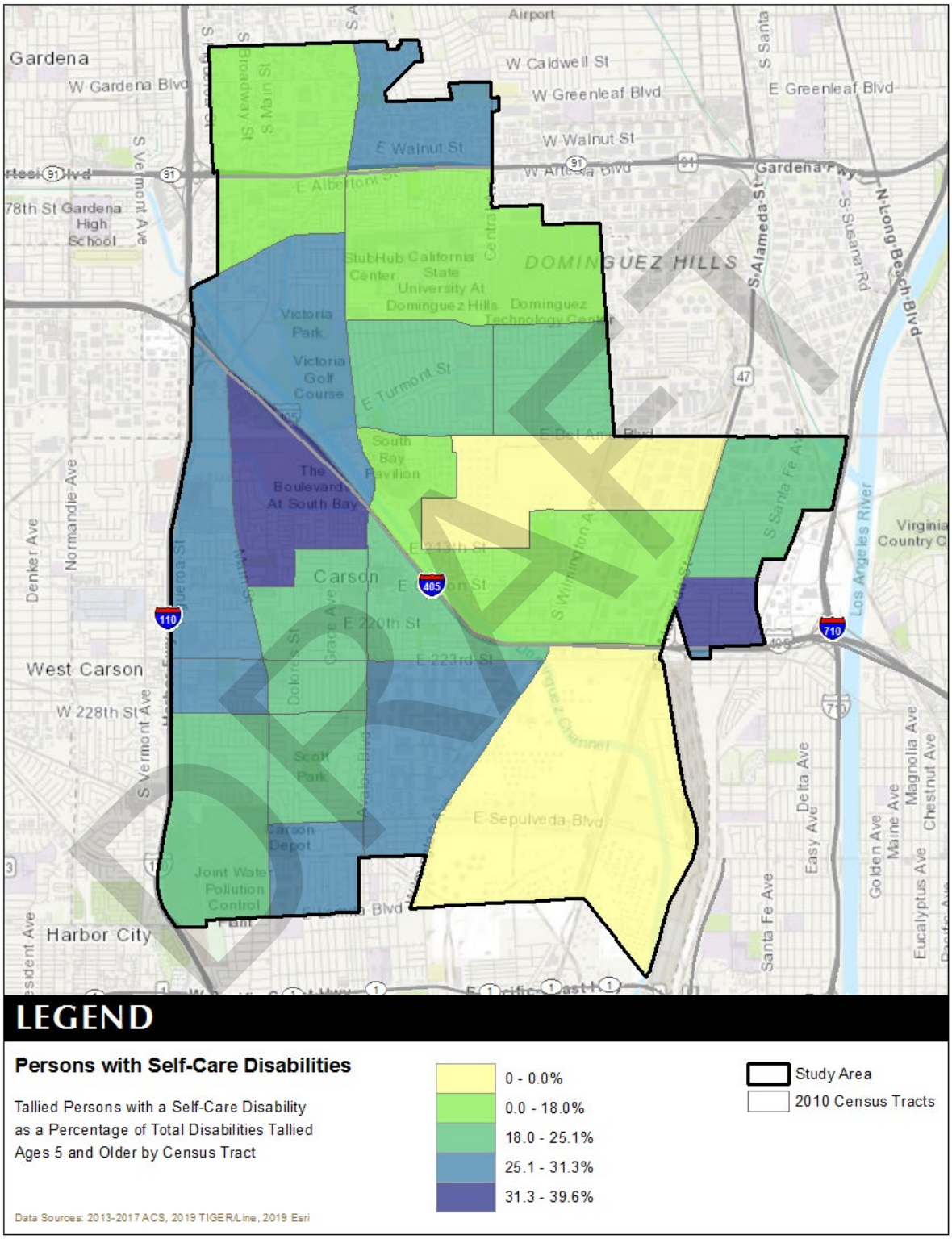
Map IV.11
Persons with Hearing Disabilities
City of Carson
2017 ACS, 2017 Tigerline, HUD AFFH Tool



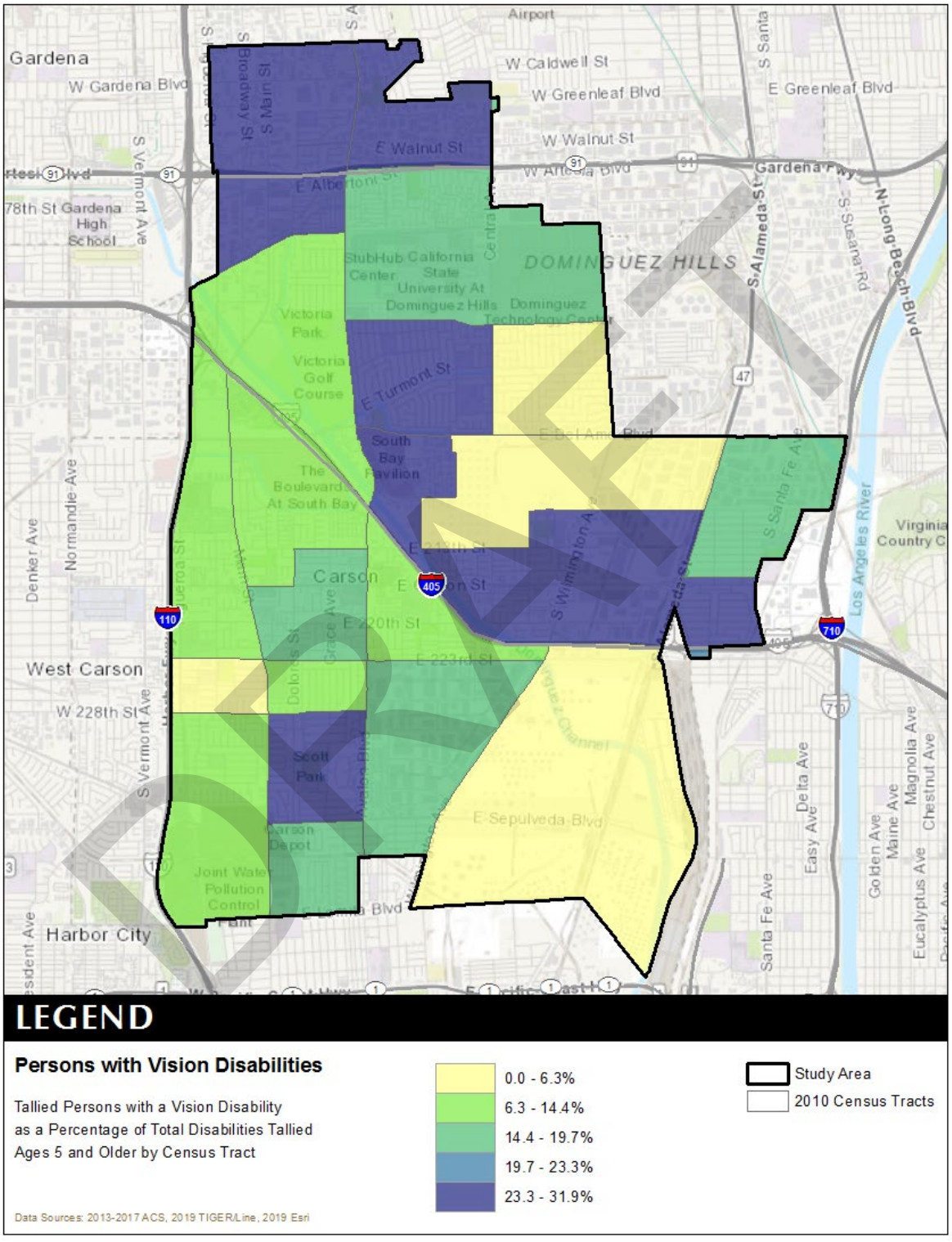
Map IV.12
Persons with Independent Living Disabilities
City of Carson
2017 ACS, 2017 Tigerline, HUD AFFH Tool



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 threshold[19]
- 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 or 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.

Table IV.50
Fair Housing Complaints 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	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.

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%	15.05	%	16.9%
Black	Loan Originated	11	39	202	271	291	110	0	924
	Application 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_____