

4 Housing Constraints

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

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

4.1 Governmental Constraints

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

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

DRAFT GENERAL PLAN UPDATE

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

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

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

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

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

Table 4-1: Standards for Density and Development Intensity

Land Use Designation	Base Density/Intensity ¹		
	Base Residential Intensity ²	Floor Area Ratio (FAR; for all uses combined, including residential and non-residential)	Maximum Increase in Residential Density/FAR with Community Benefits ³
Residential			
Low Density	up to 10	up to 0.55	-
Medium Density	10 to 18	None specified	20%
High Density	18 to 30 (18 to 40 for sites larger than two acres)	None specified	40%
Mixed Use			
Downtown Mixed Use	up to 40	up to 1.5 (active commercial frontage required) ⁴	40% (60% when combined with Active Commercial uses)
Corridor Mixed Use	up to 30	up to 1.0 ⁴	30% ⁵
Business Residential Mixed Use	up to 50	up to 1.0	40%
Flex District	up to 40	up to 1.0	40%

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

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

3. Method for determining community benefits bonus to be established in the Carson Municipal Code.

Community benefits bonus would apply to base density/FAR.

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

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

Source: City of Carson, Land-use Classifications

EXISTING DEVELOPMENT REGULATIONS

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

Land Use and Zoning

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

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

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

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

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

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

Development Standards

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

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

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

Table 4-2: Residential Development Standards

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

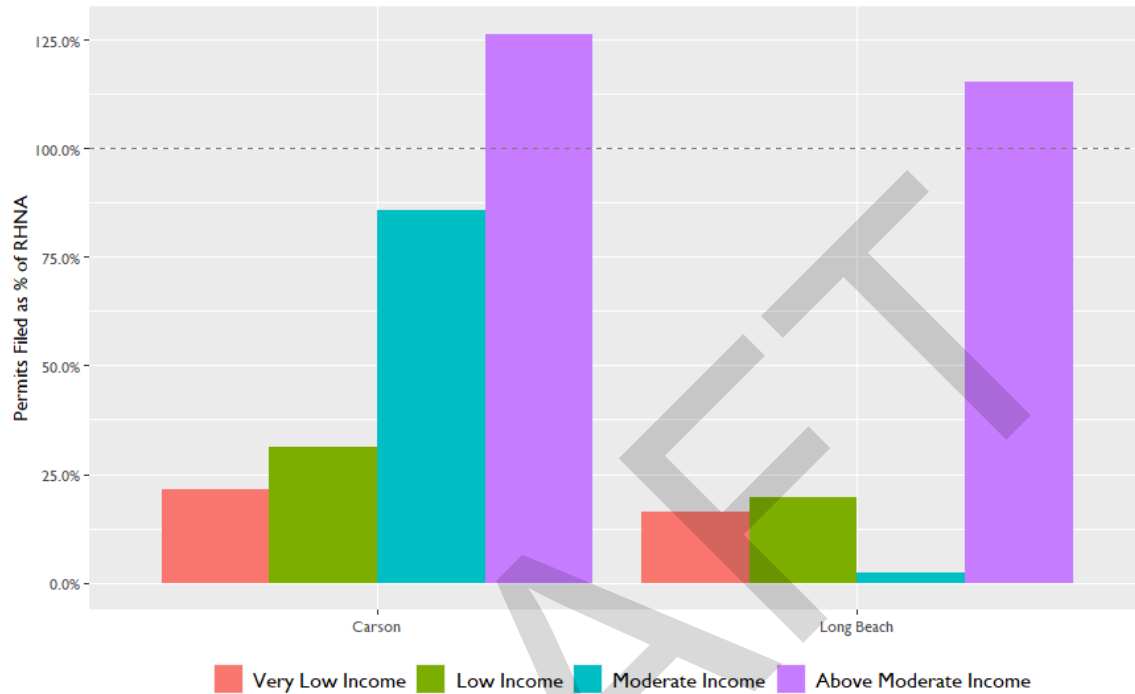
Table 4-2: Residential Development Standards

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

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

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

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

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

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

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

Building Code

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

Parking Requirements

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

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

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

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

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

Table 4-3: City of Carson Residential Parking Requirements

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

Table 4-3: City of Carson Residential Parking Requirements

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

Table 4-3: City of Carson Residential Parking Requirements

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

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

On- and Off-Site Requirements

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

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

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

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

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

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

Subdivision Regulations

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

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

Residential Condominium Standards

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

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

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

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

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

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

Density Bonus Ordinance

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

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

Table 4-4: City of Carson Density Bonus Summary¹

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

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

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

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

PROVISIONS FOR A VARIETY OF HOUSING TYPES

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

Table 4-5: Housing Types Permitted

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

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

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

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

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

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

Multifamily Residential Housing

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

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

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

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

Mixed-Use Projects

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

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

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

Accessory Dwelling Units

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

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

Table 4-6: Accessory Dwelling Unit Standards

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

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

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

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

Transitional/Supportive Housing and Emergency Shelters

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

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

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

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

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

Single-Room Occupancy (SRO)

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

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

Manufactured Homes and Mobile Home Parks

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

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

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

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

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

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

Farmworker Housing

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

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

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

Housing for Persons with Disabilities

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

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

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

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

Zoning and Land Use

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

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

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

Permits and Processing Procedures

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

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

Building Code

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

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

FEES AND EXACTIONS

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

Planning Entitlement Fees

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

Table 4-7: Planning and Application Fees

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

Table 4-7: Planning and Application Fees

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

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

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

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

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

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

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

Building Permit Fees

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

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

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

Community Facilities District

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

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

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

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

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

Source: City of Carson, Community Development Department

Interim Development Impact Fees

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

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

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

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

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

Table 4-9: Interim Development Impact Fees

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

1. MFR – Multi-family residence.

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

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

School Impact Fees

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

Table 4-10: School Impact Fees

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

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

Total Typical Fees by Unit Type

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

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

PROCESSING AND PERMIT PROCEDURES

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

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

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

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

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

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

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

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

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

INFRASTRUCTURE CONSTRAINTS

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

Water and Sewer Services

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

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

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

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

Electrical Services

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

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

Public Services

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

4.2 Non-Governmental Constraints

ENVIRONMENTAL CONSTRAINTS

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

Air Quality

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

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

Hazardous Materials

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

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

Oil Production Hazards

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

Methane Gas

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

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

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

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

Landfill Hazards

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

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

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

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

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

Table 4-11: Landfill Sites and Land Use

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

Table 4-1 I: Landfill Sites and Land Use

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

Source: GeoTracker, 2021

Noise Exposure

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

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

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

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

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

Table 4-12: Noise and Residential Land Use Compatibility

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

Notes:

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

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

Table 4-13: Interior and Exterior Residential Noise Standards

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

1. Indoor environmental including: Bedrooms, living areas, bathrooms, toilets, closets, corridors.
2. Outdoor environment limited to: Private yard of single family, multi-family private patio or balcony which is served by a means of exit from inside the dwelling, balconies six feet deep or less are exempt, mobile home park, park's picnic area, school's playground.
3. Noise level requirement with closed windows. Mechanical ventilating system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of UBC.
4. Exterior noise levels should be such that interior noise levels will not exceed 45 CNEL.

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

MARKET CONSTRAINTS

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

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

Land Costs

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

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

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

Construction Costs

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

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

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

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

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

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

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

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

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

Availability of Financing

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

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

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

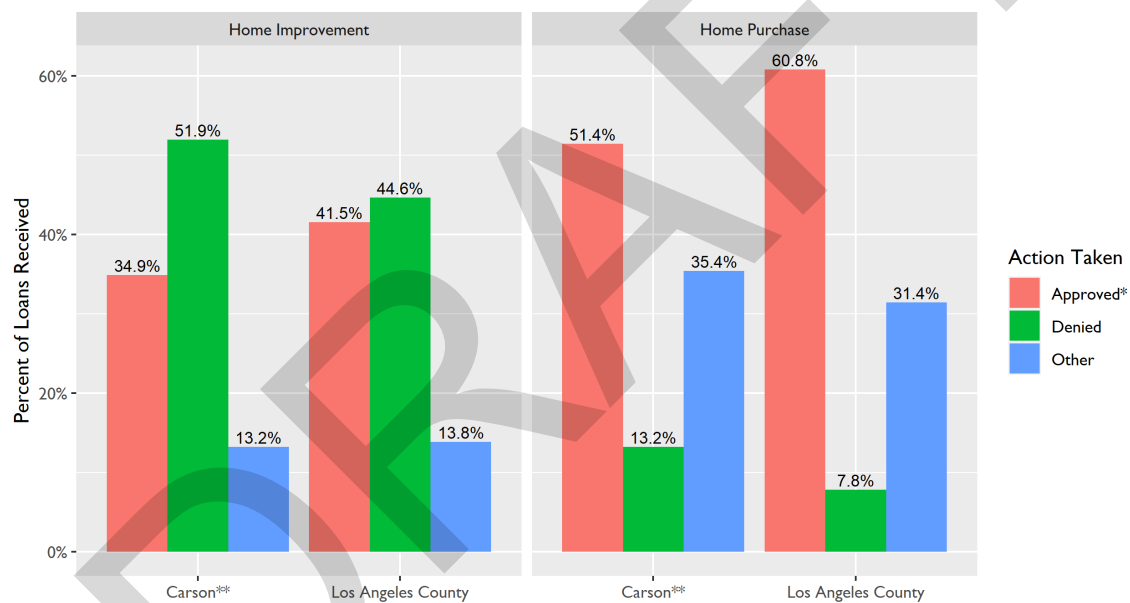
Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications as well as the income, gender, and race/ethnicity of loan applicants. A total of 1,381 loan applications were submitted to lenders for the purchase of homes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

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

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

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

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



*Approved loans include: loans originated and applications approved, but not accepted.
 **Includes the 26 census tracts within the boundaries of the City and its Sphere of Influence.

Source: HMDA, 2019

OTHER NON-GOVERNMENTAL CONSTRAINTS

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

NIMBYism

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

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

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

Table 4-14: Major Residential Development Projects in Carson

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

Table 4-14: Major Residential Development Projects in Carson

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

1. Rounded upwards to the nearest whole number.

2. Includes affordable housing.

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

Source: City of Carson, Community Development Department

Lending Practices

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

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

Shortage of Labor

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

Other Economic Factors

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

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