

3 Affirmatively Furthering Fair Housing

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

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

3.1 Enforcement and Capacity

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

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

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

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

3.2 Assessment of Fair Housing

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

INTEGRATION AND SEGREGATION

Race and Ethnicity

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

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

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

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

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

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

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

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

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

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

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

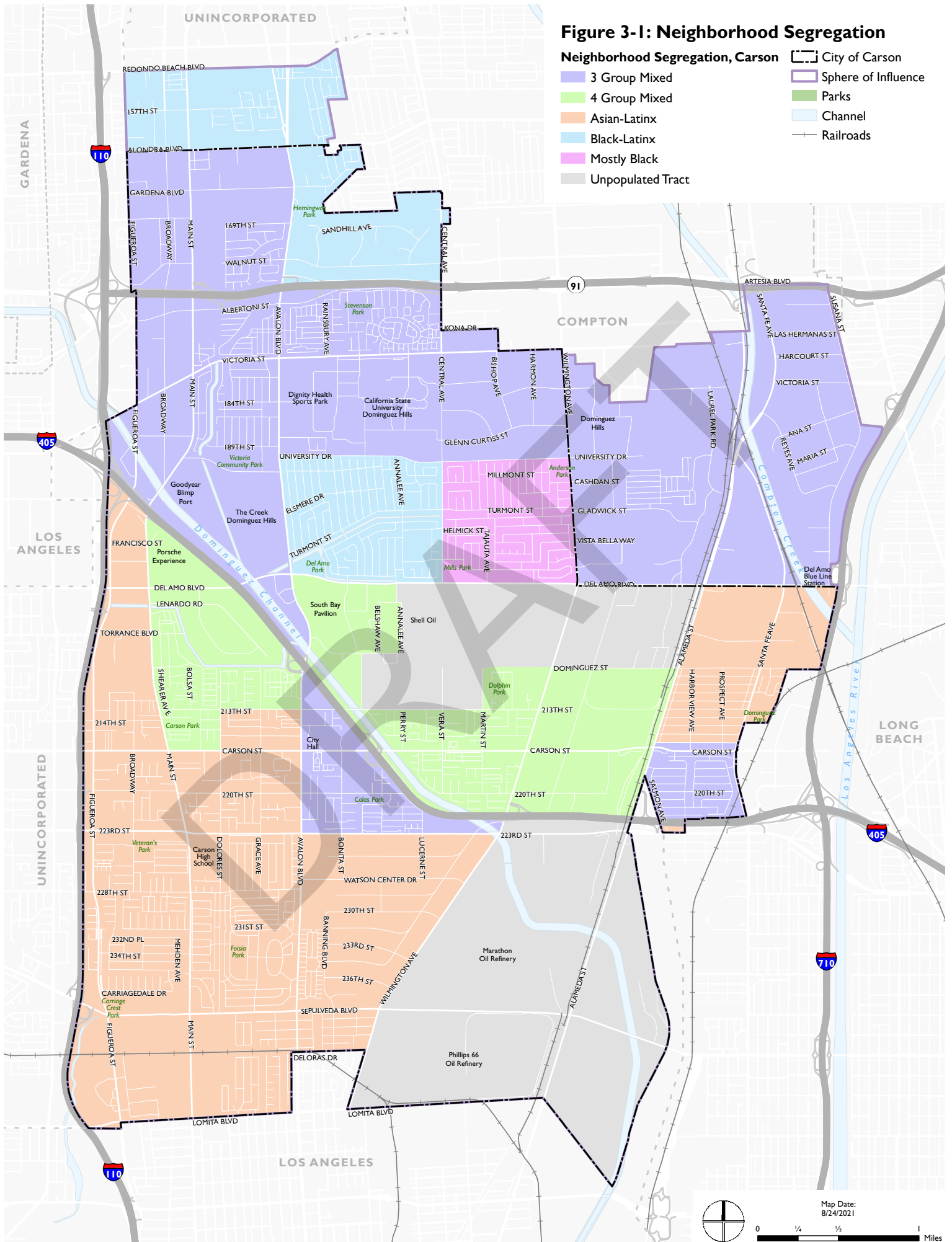
increasing levels of segregation. Chart 3-1 confirms these trends with more current data. Carson has relatively low levels of segregation for “non-white” racial/ethnic groups compared to the greater Los Angeles region, except for Black households which have the highest index values for both geographic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

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



Source: July 2020 HUD AFFHT0006 Table 12

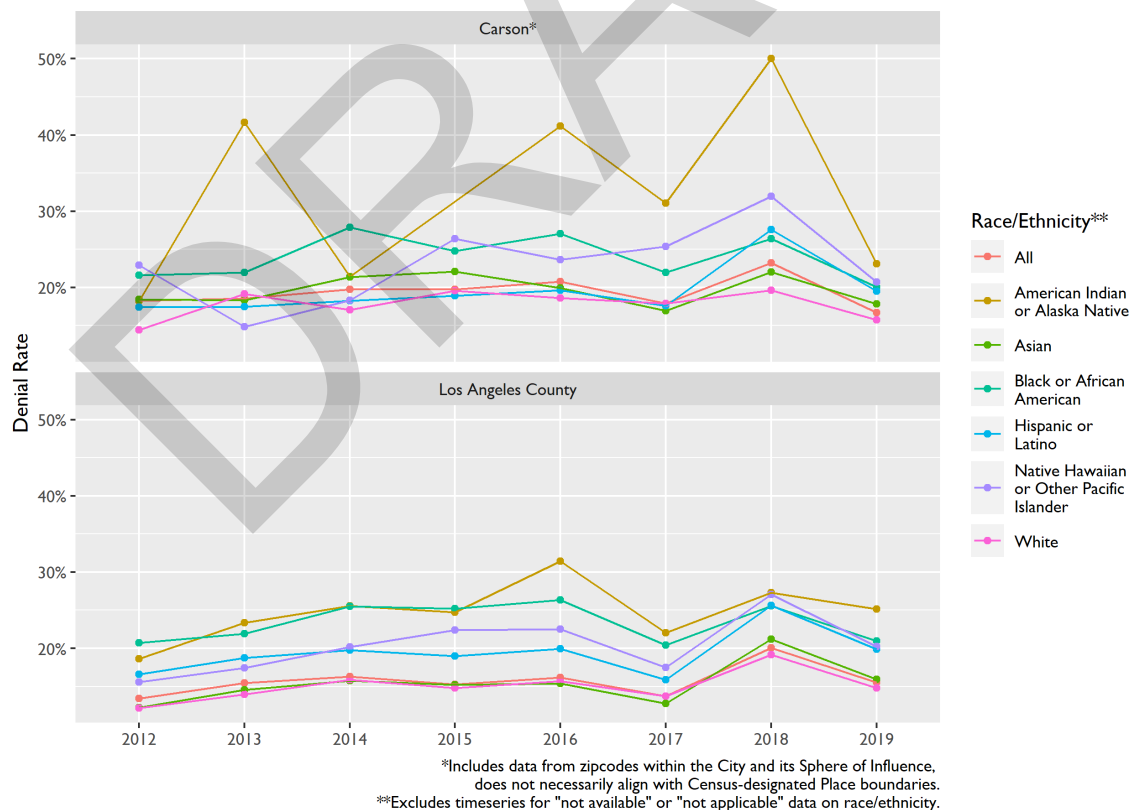
Since Carson is a majority-minority city, the dissimilarity index provided by HUD may not provide a precise assessment of patterns of segregation in the city. HCD has provided neighborhood segregation typologies, created by the Urban Displacement Project at UC Berkeley, to capture such nuances. Segregation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



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

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

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



Source: HMDA, 2012-2019

Persons with Disabilities

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

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

Familial Status

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

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

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

Income Level

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

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

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

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Figure 3-2: Persons with a Disability

Percent of Population with a Disability

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

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

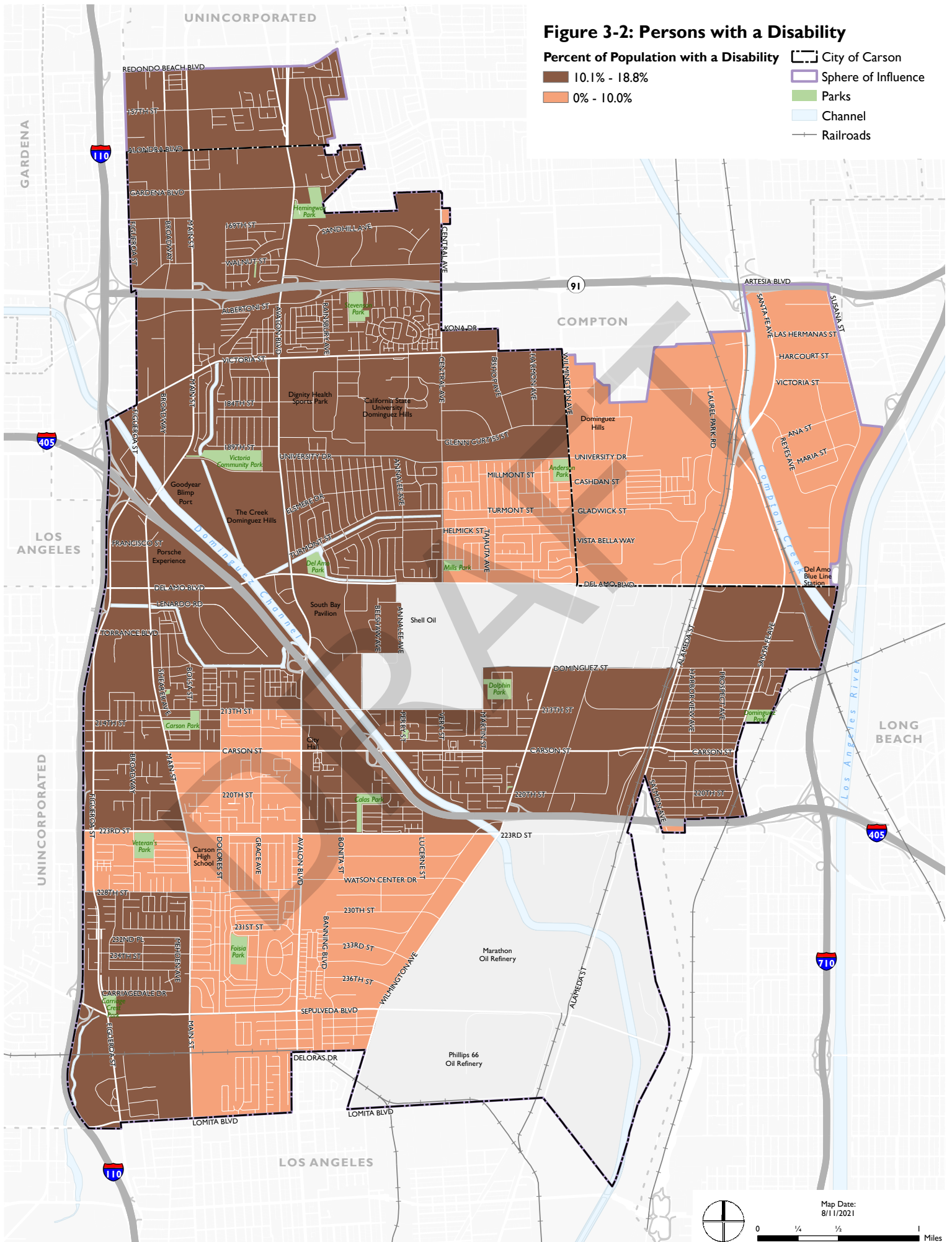


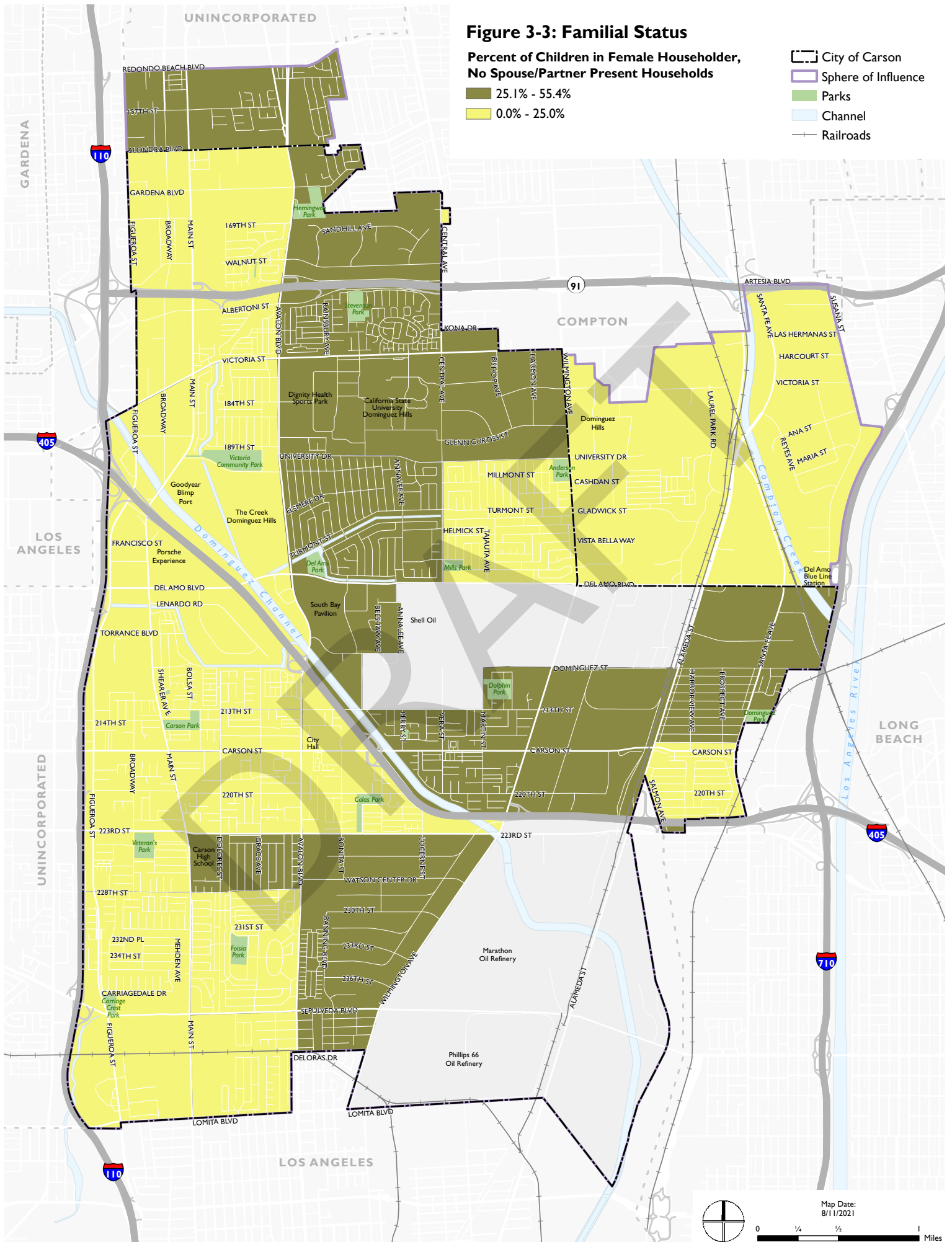
Figure 3-3: Familial Status

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

25.1% - 55.4%

0.0% - 25.0%

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



Map Date:
8/11/2021

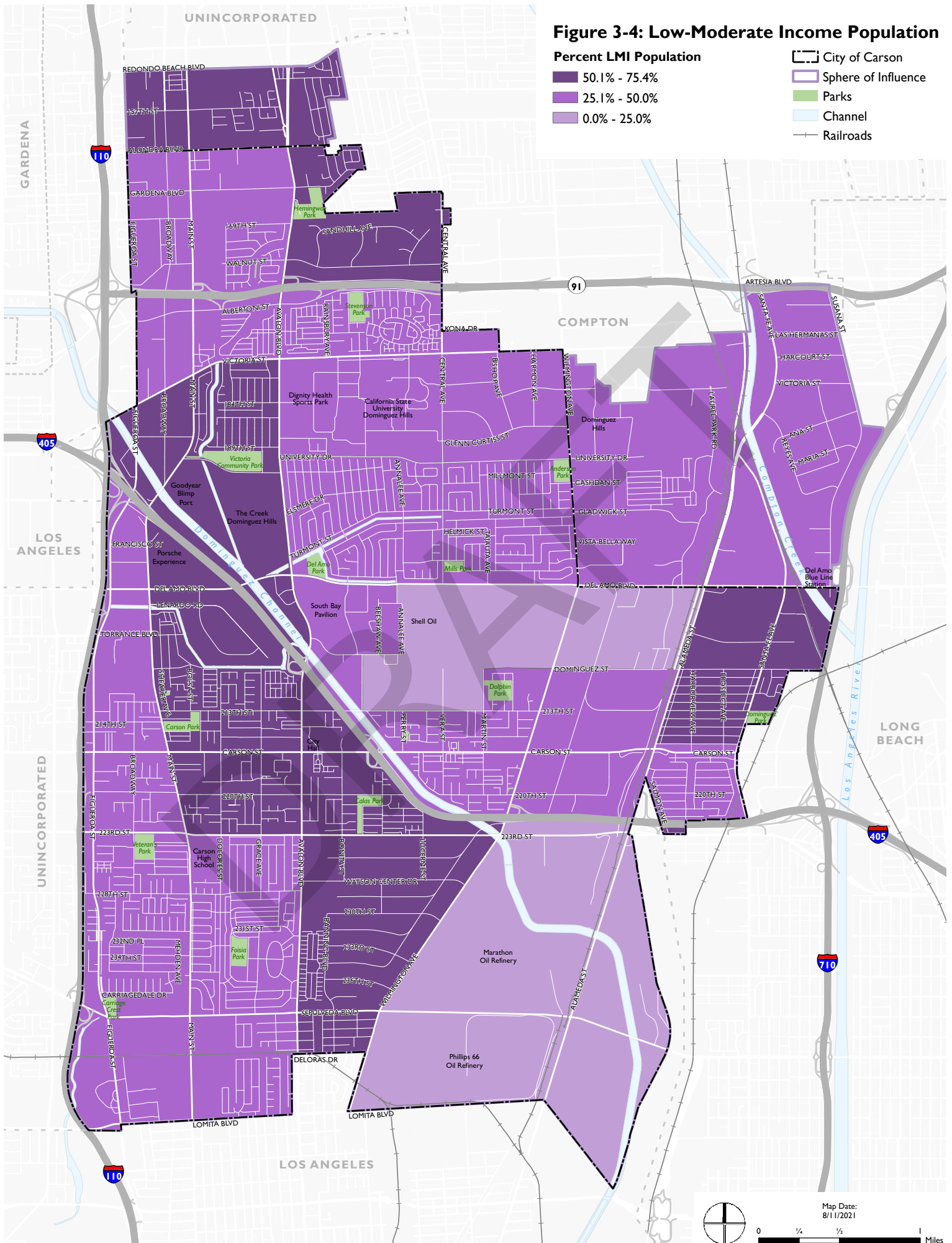
0 1/4 1/2 1 Miles

Figure 3-4: Low-Moderate Income Population

Percent LMI Population

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

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



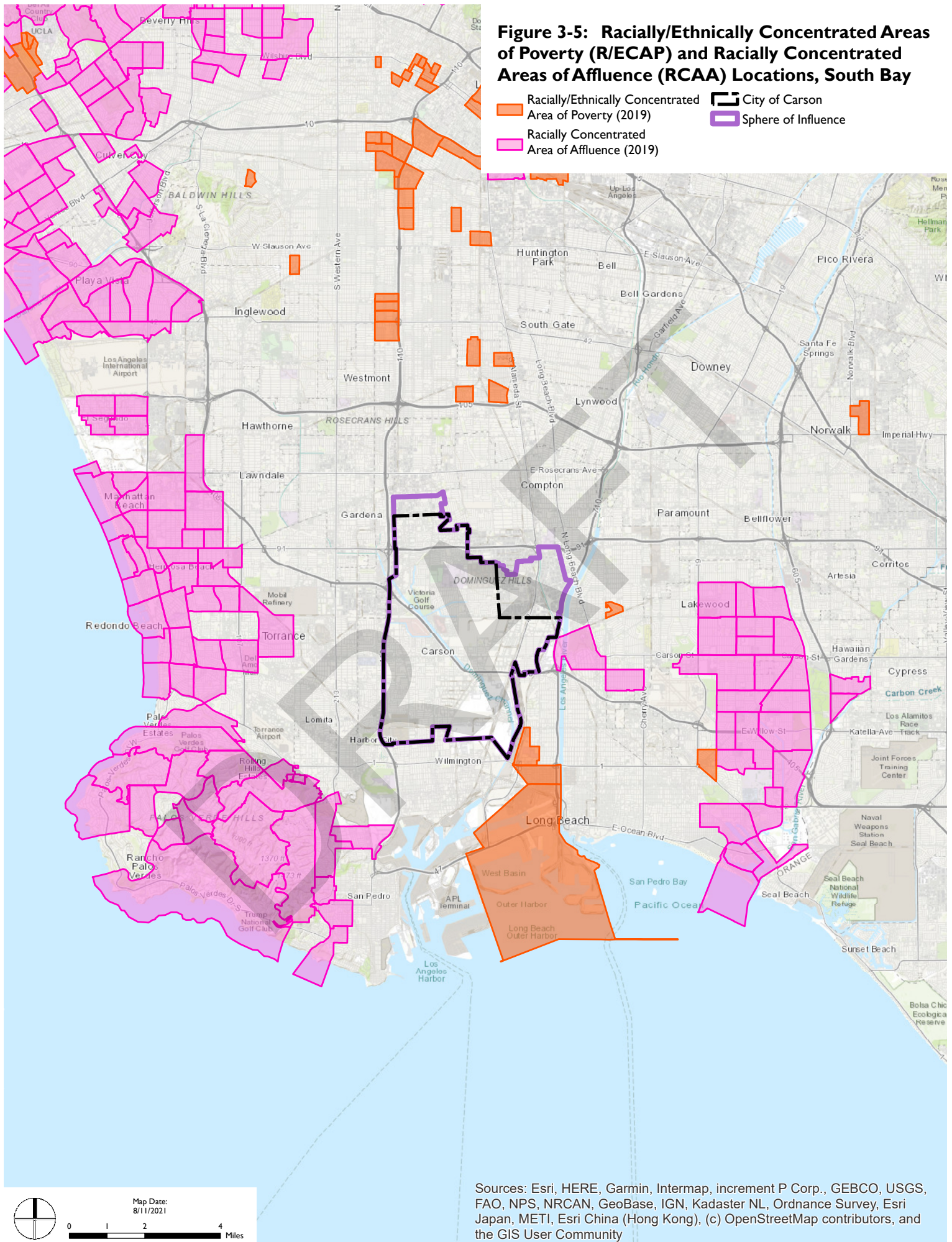
R/ECAPS AND RCAAS

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

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

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

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



DISPARITIES IN ACCESS TO OPPORTUNITY

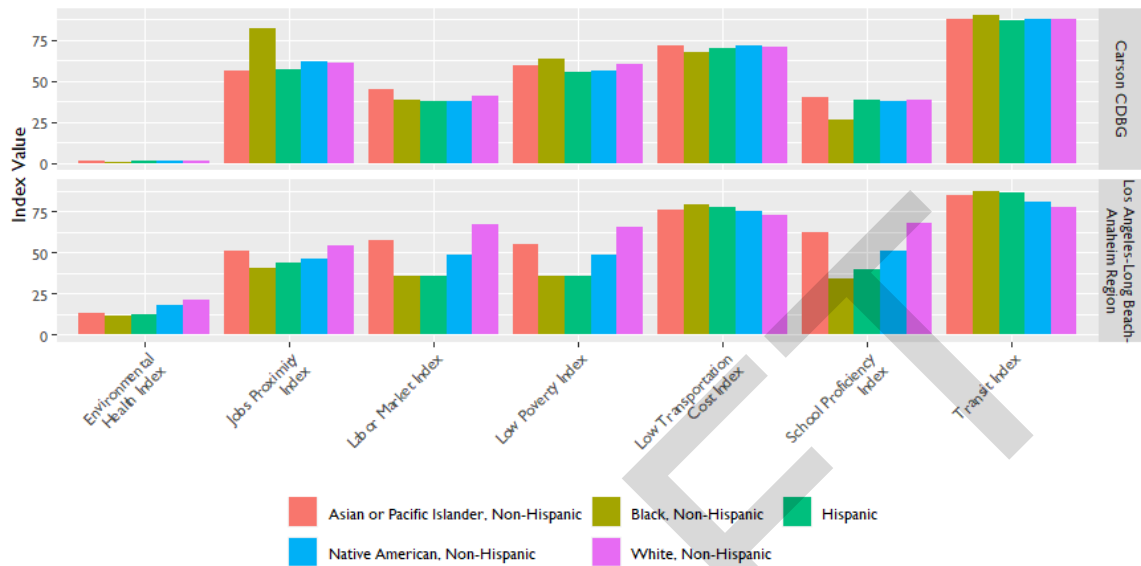
HUD has provided a set of opportunity indices to quantify disparities in Access to Opportunity. These indices can measure geographic trends and levels of access within a community. The 2020 AI provides a thorough analysis of these indices, elements of which are summarized, reproduced and updated below.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

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

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

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

Chart 3-3: Opportunity Indices – Total Population



Source: HUD, AFFHT0006 Table 12, July 2020

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



Source: HUD, AFFHT0006 Table 12, July 2020

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

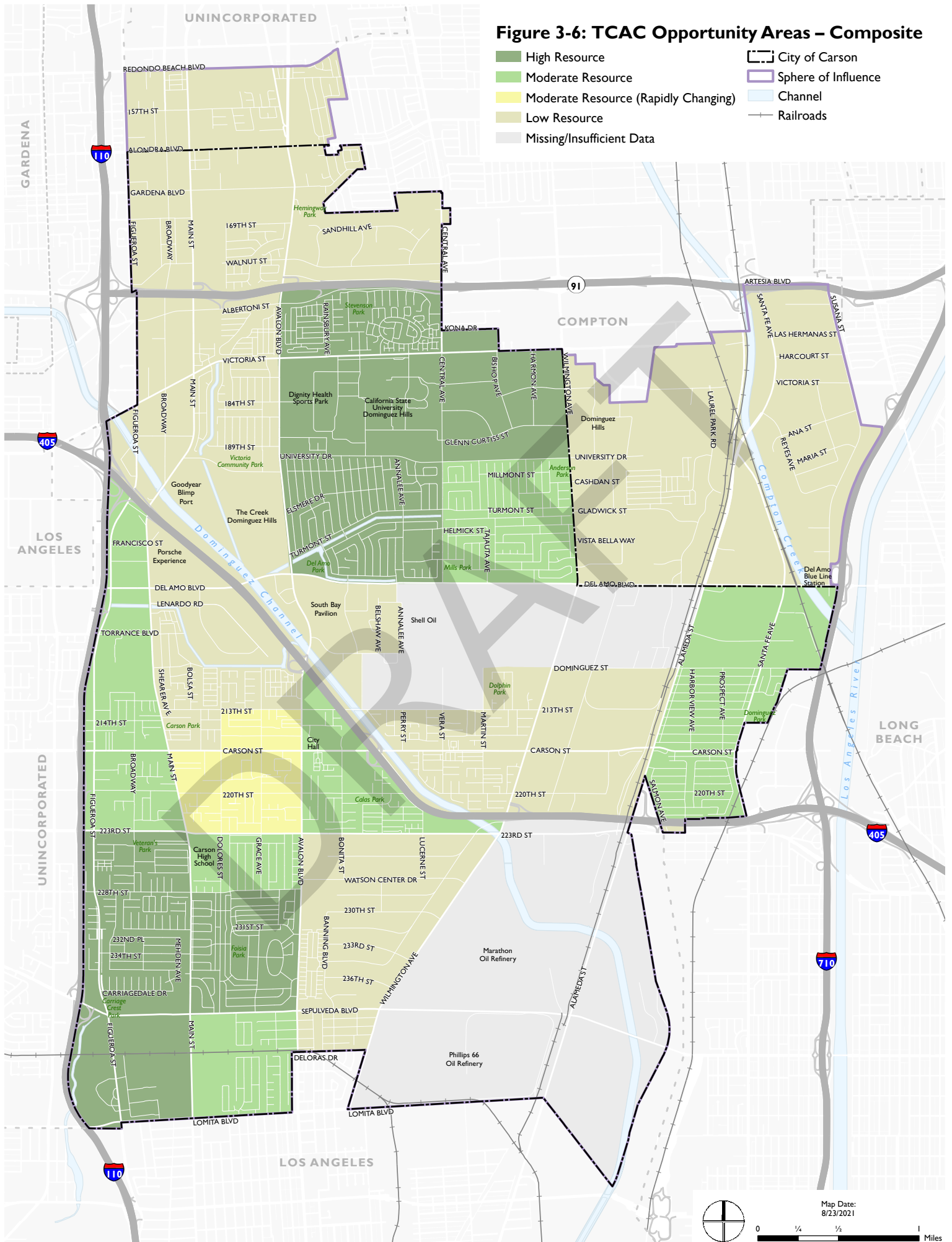
research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task Force developed a series of “opportunity maps” to determine the level of resources within a jurisdiction.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

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

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

High Resource
 Moderate Resource
 Moderate Resource (Rapidly Changing)
 Low Resource
 Missing/Insufficient Data

City of Carson
 Sphere of Influence
 Channel
 Railroads



DISPROPORTIONATE HOUSING NEEDS

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

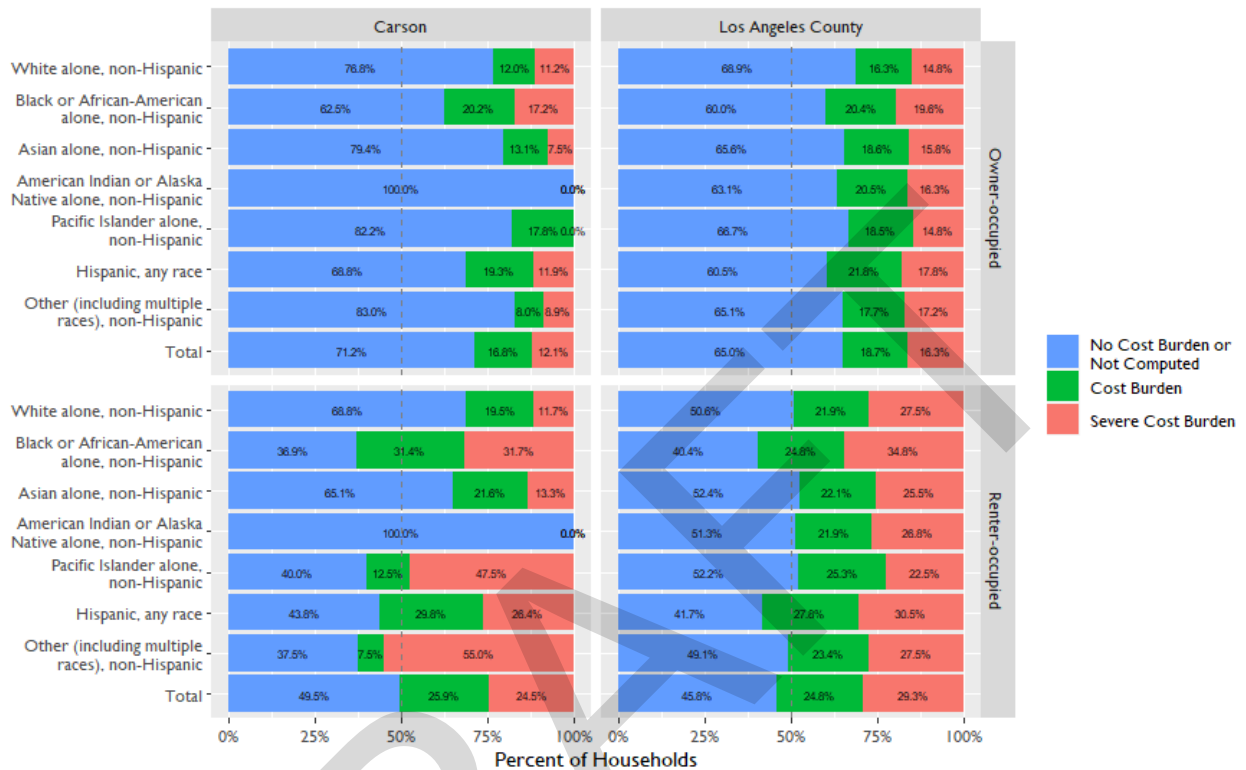
The 2020 AI concluded that cost burden remains a major problem in Carson, which is confirmed by the cost burden analysis conducted in Chapter 2 of this Housing Element (Table 2-11). Further, the 2020 AI indicates that cost burden and housing problems more generally impact a large number of Black, Asian,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

Cost Burden

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

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

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

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


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

Overcrowding

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

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

Figure 3-7: Homeowner Cost Burden

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

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

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

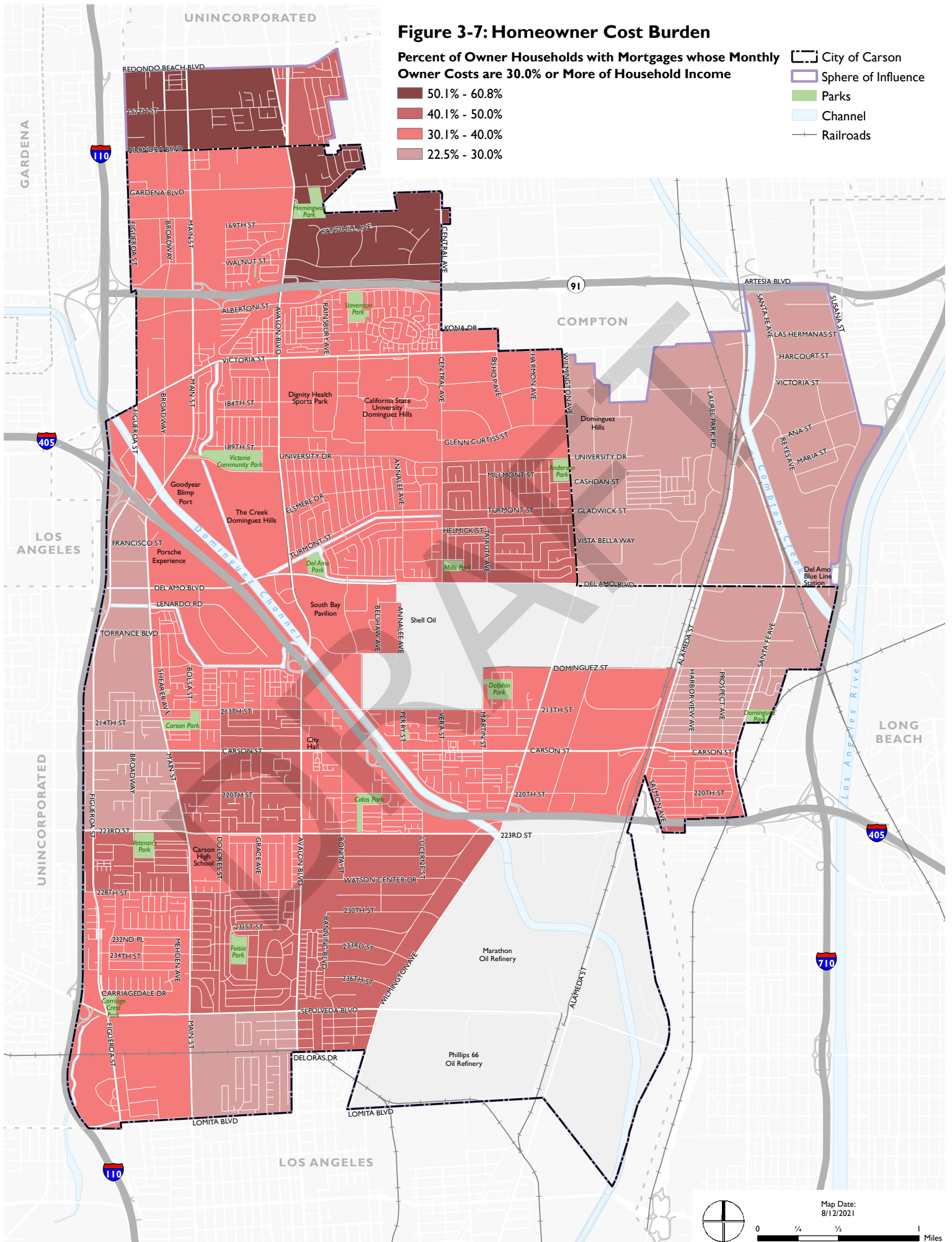


Figure 3-8: Renter Cost Burden

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

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

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

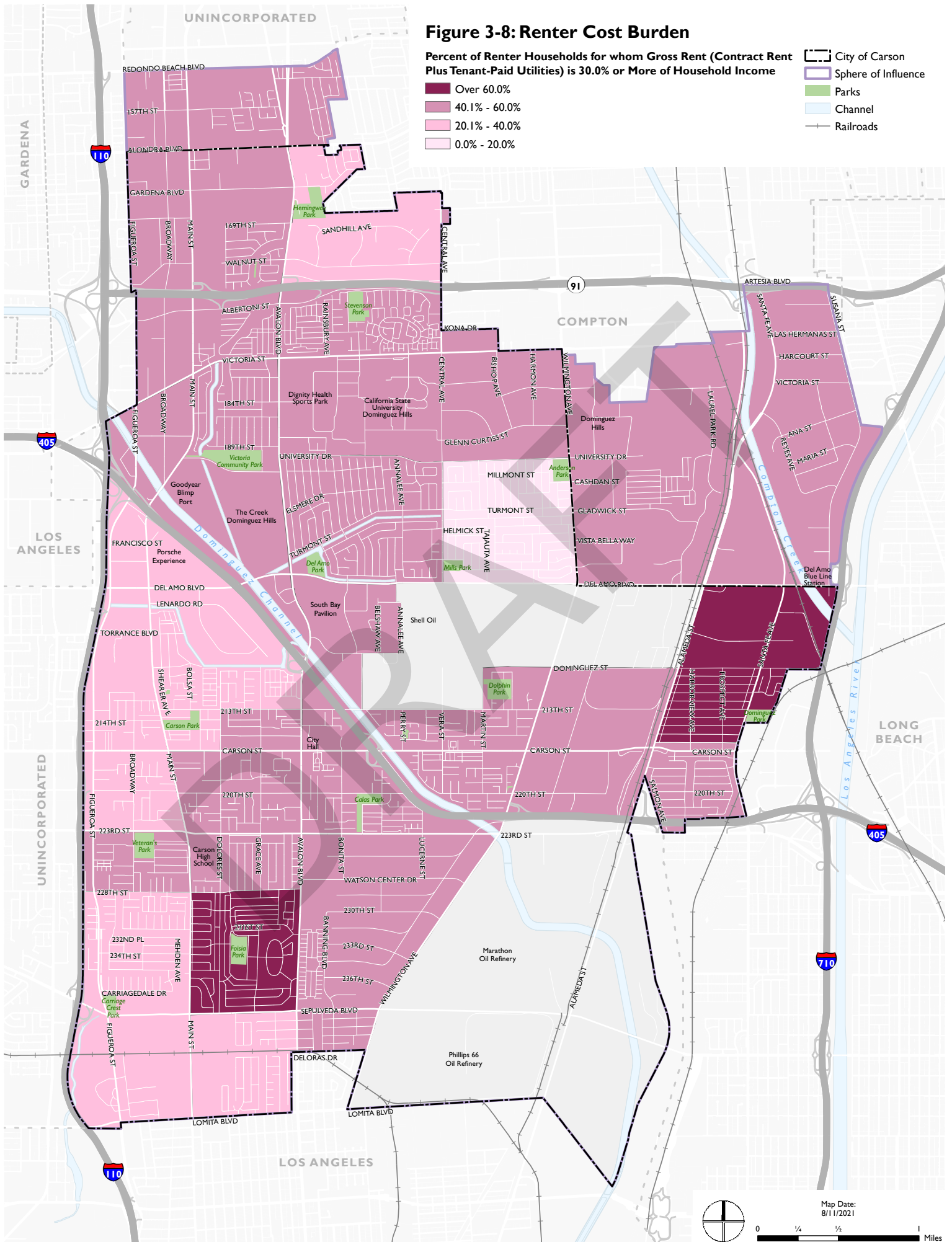
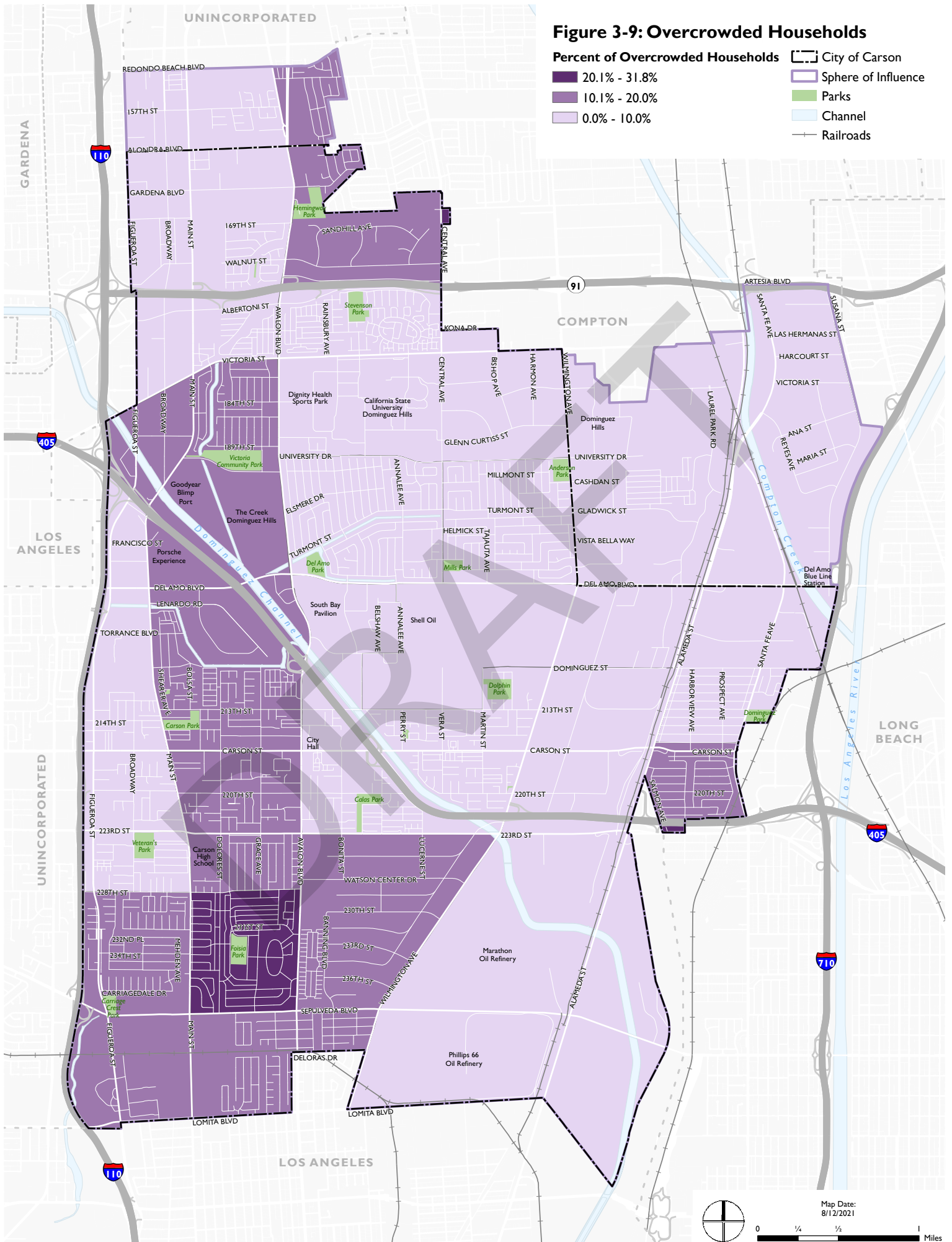
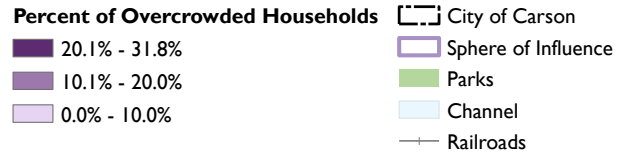


Figure 3-9: Overcrowded Households



Displacement Risk

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

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

Figure 3-10: Sensitive Communities in Carson

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

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3.3 Priorities and Goals

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

CONTRIBUTING FACTORS

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

Table 3-3: City of Carson Contributing Factors

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

Table 3-3: City of Carson Contributing Factors

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

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

ACHIEVEMENTS, GOALS AND ACTIONS

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

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

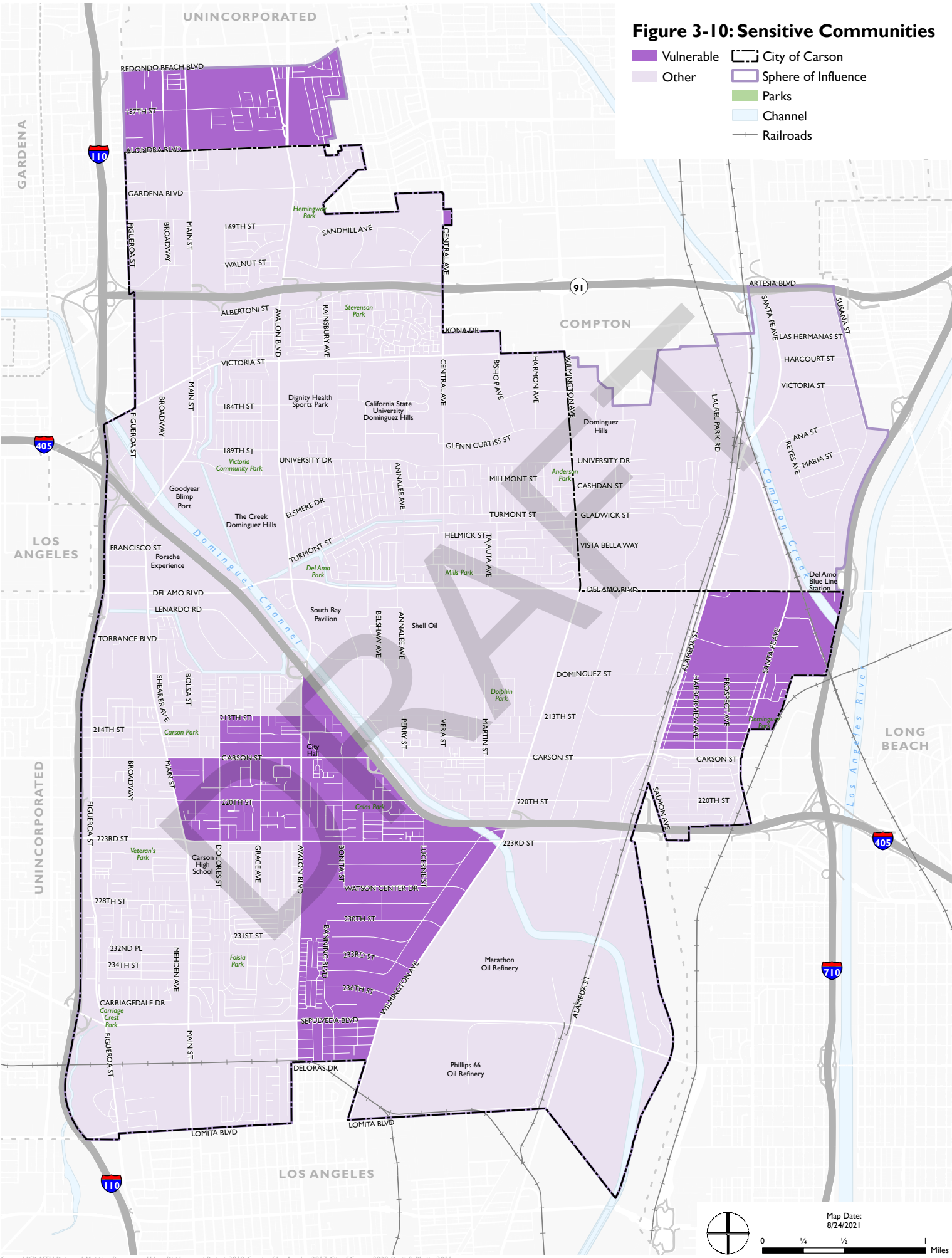
In order to continue to reduce impediments, including those identified in Table 3-3, the 2020 AI outlined a number of specific goals and actions that the City will prioritize to affirmatively further fair housing. These goals and actions are reproduced in Table 3-4, which summarizes fair housing issues/impediments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

Table 3-4: Fair Housing Priorities and Goals

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

Source: City of Carson, 2020 AI

Figure 3-10: Sensitive Communities



Source: HCD AFFH Data and Mapping Resources - Urban Displacement Project, 2019; County of Los Angeles, 2017; City of Carson, 2020; Dyett & Bhatia, 2021