

May 27, 2025

TO: Staff

FROM: Amy J. Bodek, AICP
Director of Regional Planning



**SUBDIVISION AND ZONING ORDINANCE INTERPRETATION MEMO NO. 2025-06-
APARTMENT DEVELOPMENT REGULATIONS IN THE WEST CARSON TRANSIT-
ORIENTED DISTRICT SPECIFIC PLAN COMMERCIAL ZONES**

PURPOSE

This memorandum provides clarification on the regulations for apartment houses in Table 22.414.060-A (Principal Use Regulations for Commercial Zones) of Chapter 22.414 of the County Code (West Carson Transit-Oriented District Specific Plan).

BACKGROUND

The West Carson Transit-Oriented District (TOD) Specific Plan (Specific Plan) was adopted by the Board of Supervisors in 2019 and updated in March 2025 as part of the South Bay Area Plan Project.

In Table 22.414.060-A (Principal Use Regulations for Commercial Zones) of the Specific Plan, 'apartment houses' are listed as a permitted use in the Neighborhood Commercial (NC) and Unlimited Commercial (UC) Zones with the following footnotes:

- Where use is subject to Section 22.128.200 (Supportive Housing Streamlining) and Chapter 22.166 (Housing Permits).
- Use is permitted on lots outside of the Very High Fire Hazard Severity Zone, as depicted in the General Plan, in its entirety, and where use is subject to Section 22.130.200 (Motel Conversions, Permanent) and Chapter 22.166 (Housing Permits).

These two footnotes mirror the regulations for apartment houses in Zones C-2 and C-3 in Table 22.20.030-B (Principal Use Regulations for Commercial Zones), shown in the image below, as they are the base zones for Zones NC and UC in the Specific Plan. While the intent was to allow all forms of apartment housing in Zones NC and UC, the two footnotes above are out of context and could be interpreted as restricting apartment houses to only certain people. From a Fair Housing standpoint, the Specific Plan cannot restrict apartment houses to solely supportive housing and motel conversions.

Table 22.20.030-B: Principal Use Regulations for Commercial Zones

Multi-family housing ²⁵							
Apartment houses	SPR ^{18, 29, 30} / CUP ²⁶	SPR ^{18, 29, 30} / CUP ²⁶	SPR ^{18, 29, 30} / CUP ²⁶	SPR ^{18, 29, 30} / CUP ²⁶	SPR ^{29, 30} / CUP	SPR ^{18, 29, 30} / CUP ²⁶	-
18. The lot shall be: 1) outside of a Very High Fire Hazard Severity Zone, as depicted in the General Plan, in its entirety; 2) outside of the Coastal Zone, as defined in Division 2 (Definition), in its entirety; 3) outside of a Significant Ecological Area, as depicted in the General Plan, in its entirety; 4) outside of a Hillside Management Area, as depicted in the General Plan, in its entirety; 5) outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an Airport Influence Area, as depicted in the General Plan, in its entirety; 6) served by a public water system; 7) served by a public sewer system; and 8) fronting a highway or a public street.							
26. Where the lot does not meet the criteria specified in Note 18, above.							
27. Use is limited to developments with two or more attached dwelling units.							
28. No more than six townhouses shall be confined within a single building.							
29. Where use is subject to Section 22.128.200 (Supportive Housing Streamlining) and Chapter 22.166 (Housing Permits).							
30. Use permitted on lots outside of the Very High Fire Hazard Severity Zone, as depicted in the General Plan, in its entirety, and where use is subject to Section 22.130.200 (Motel Conversions, Permanent) and Chapter 22.166 (Housing Permits).							

INTERPRETATION

The footnotes are not meant to prohibit apartment houses in Zones NC and UC. Apartment houses are permitted in both zones with a Site Plan Review and the footnotes only apply to supportive housing and motel conversion projects.

APPLICABILITY

This memorandum applies to all new and existing applications under review as of the date of this memorandum and shall remain valid until Title 22 is amended to clarify these provisions.

AJB:CC:ER:PH:AJ:ia