



Southern California  
Los Angeles and Ventura  
Counties Chapter

March 18, 2014

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Planning and Land Use Management Committee  
City of Los Angeles  
200 N. Spring Street  
Los Angeles, CA 90012

**Re: Small Lot Subdivisions Procedural Change ("Proposed Ordinance")**

Dear Members of the PLUM Committee,

The Building Industry Association of Southern California Inc., Los Angeles/Ventura Counties Chapter (BIA) is a regional trade association that represents over 1,000 member companies and their respective employees involved in building new homes in Southern California. On behalf of our membership, we are submitting comments on the proposed ordinance to modify Section 17.06 of the Los Angeles Municipal Code (LAMC) to allow construction of small lot subdivisions to commence prior to the recordation of the final map, with recordation of a covenant.

The BIA serves as the collective voice of the building industry. In this instance, the facts, opinions and information contained herein is the result of a coordinated effort of an esteemed group of industry leaders who have genuine concern for the future of homebuilding in the City of Los Angeles. This group of industry leaders are the "best of the best" when it comes to thoughtful and responsible use of the City's land resources to create thriving and sustainable housing.

The BIA is supportive of the Proposed Ordinance as it will help streamline processing and alleviate the need for project variances. Long processing time delays the construction of much needed housing, while also increasing the cost. In addition, variances are generally viewed negatively by neighborhood councils and community groups, further complicating the approval process. Streamlining the small lot approval process will help to reduce the pressure on housing affordability and the continual shortage of housing supply.

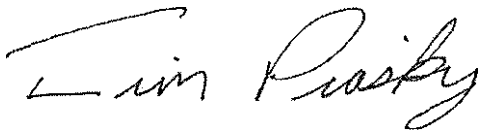
In addition, the BIA is supportive of the Planning Departments recently issued Guidelines to be used to steer the implementation of the Small Lot Subdivision Ordinance. It is our understanding that there have been some projects constructed in the past that have not met the intent of the

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Small Lot Subdivision Ordinance and/or have been poor additions to the community. The Guidelines should serve to prevent this from occurring in the future. However, it is imperative that these Guidelines not be used as a basis for approving or denying a project and that City Planners at all levels fully understand that some leniency and creativity is permitted in the implementation of these Guidelines.

We appreciate the efforts of the Planning Department in seeking to improve the implementation of the Small Lot Subdivision Ordinance and stand ready to assist any way that we can to create cost-effective projects that help to alleviate the housing shortage while also improving the communities within the City of Los Angeles.

Sincerely,

A handwritten signature in cursive script that reads "Tim Piasky". The signature is written in black ink and is positioned above the printed name and title.

Tim Piasky  
Chief Executive Officer