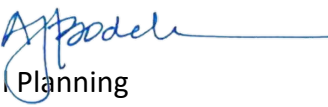


April 22, 2025

TO: Staff

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

SUBDIVISION AND ZONING ORDINANCE INTERPRETATION MEMO NO. 2025-03 – DISASTER RECOVERY: CERTIFICATE OF COMPLIANCE REQUIREMENT FOR TEMPORARY HOUSING AND REBUILD PROJECTS

PURPOSE

This memorandum explains when a Certificate of Compliance (“C of C”) is required for temporary housing and rebuild projects in areas impacted by the Eaton and Palisades fires (“fire impact areas”).

BACKGROUND

The County prioritizes rapid recovery and reconstruction from the devastation of the Eaton and Palisades fires. The Board of Supervisors (Board) granted Emergency Authority to the Director of Regional Planning (Director) to streamline disaster recovery. To this end, LA County Planning staff (Staff) will determine whether a C of C is required for temporary housing and rebuild projects on properties in the fire impact areas through a simplified and abbreviated process. This process is intended to facilitate a speedy review while still being generally consistent with the requirements of [Subdivision Map Act Section 66499.34](#) and [County Code Chapter 21.60 \(Certificates of Compliance – Notices of Violation\)](#).

INTERPRETATION

In the fire impact areas, Staff will use the following process to determine whether a C of C is required:

1. **Temporary Housing** is not a permanent improvement and does not require a C of C.
2. **Like-For-Like Rebuild Projects.** It is reasonable to believe that structures approved under [County Code Section 22.256.050 \(Disaster Recovery – Like-For-Like Replacement\)](#) were previously issued building permits. Therefore, like-for-like structures will be reissued building permits. [Subdivision Map Act Section 66499.34](#) requires a local agency to issue a C of C before they issue any permit or grant of approval. Therefore, a C of C is not required for like-for-like

rebuild projects because the structures were previously issued building permits and are now being rebuilt pursuant to reissued building permits.

3. Accessory Dwelling Units are accessory units and do not require a C of C.

4. Not-Like-For-Like Rebuild Projects (New Construction):

- a. **Land with a Recorded C of C or Lot Line Adjustment, as Effectuated Through Deeds.** No additional research is needed, and a C of C is not required.
- b. **Vacant Land Not Previously Developed.** A C of C is required for deed created dashed line parcels and parcels within an Antiquated Tract Map with solid parcel lines.
- c. **Land Previously Developed:**
 - i. **Deed Created Dashed Line Parcel.** Staff will review all available documentation, including historic Assessor's Parcel Maps and County Assessor's records, to determine if the parcel was created prior to March 4, 1972, which is the effective date of the Subdivision Map Act. If this documentation shows that the parcel was created prior to March 4, 1972, a C of C is not required.
 - ii. **Parcel Within an Antiquated Tract Map with Solid Parcel Lines.** If the parcel was created by an antiquated Tract Map or through Board approval, a C of C is not required.

APPLICABILITY

This memorandum applies to properties in the fire impact areas and will expire when the Director stops implementing the provisions of [County Code Chapter 22.256 \(Disaster Recovery\)](#) in these areas.

If you have any questions regarding this interpretation, please contact Timothy Stapleton at tstapleton@planning.lacounty.gov.

AJB:DD:JH:TS:ia