

Guillen, Dora

From: Ana Gromis <agromis@biasc.org>
Sent: Monday, April 13, 2026 1:53 PM
To: Jabbar, Al; Hahn, Charles; Goebel, Yasie; Campbell, Tara; Anas, Nick; Napuri, Alyssa; COB_Response
Subject: Coalition Comment Letter re: Agenda Item S43A
Attachments: Coalition Letter re Item S43A_4_13_26.pdf

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Good Afternoon Chair Chaffee and Supervisors,

Please see the attached correspondence on behalf of a number of coalition partners, requesting a continuance of Item S43A (agendized for tomorrow, April 14th) regarding the proposed ordinance pertaining to subcontractor disclosure. We appreciate your consideration of this request and look forward to collaborating with the County further on this matter.

Thank you,

Ana



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OC Tax.org
Orange County Taxpayers Association

April 13, 2026

Chair Doug Chaffee
Orange County Board of Supervisors
400 W Civic Center Dr,
Santa Ana, CA 92701

RE: Request for Continuance of Agenda Item – Proposed Ordinance (Subcontractor Disclosure Requirement)

Dear Chair Chaffee,

On behalf of the above identified organizations, representing thousands of businesses, homebuilders, commercial property owners, trade partners, and suppliers across the region—we write to urgently request a continuance of Item S43A regarding the proposed ordinance requiring subcontractor disclosure prior to building permit issuance.

This item has been placed on the April 14, 2026 Board of Supervisors agenda without outreach to, consultation with, or input from the very stakeholders it will directly impact. These stakeholders were not made aware of any contract-related issues associated with development activity in the county, much less issues that would merit this level of action. Advancing a measure of this consequence without engagement from the building, contractor, and business community is deeply concerning and inconsistent with transparent, informed policymaking.

The ordinance, as currently drafted, is fundamentally flawed. It introduces requirements that are, in many cases, infeasible—particularly the expectation that applicants disclose federal and state labor violations that are not readily accessible or may be impossible to verify. Compounding this, the proposal attaches disproportionate penalties, including misdemeanor charges and potential jail time, for noncompliance with requirements that lack clarity and practicality. Such punitive measures, especially absent stakeholder input, are unjustifiable.

Equally troubling is the inclusion of enforcement mechanisms. In practice, these actions can effectively terminate a project, given the fragile nature of construction timelines and trade coordination. The economic consequences of such provisions cannot be overstated.

Moreover, this ordinance represents a significant and unwarranted intrusion into private business information, mandating public disclosure where no such requirement currently exists. The State of California already maintains an extensive and robust framework of labor laws and enforcement mechanisms. This proposal is duplicative at best and overreaching at worst, placing Orange County at risk of adopting counterproductive and excessive regulation.

For these reasons, we strongly urge the Board to continue this item to a future date. A proposal of this magnitude demands deliberate review, meaningful stakeholder engagement, and a thorough assessment of its real-world impacts. Moving forward without such diligence risks serious and lasting consequences for all types of development and construction projects, as well as the broader business climate in Orange County.

We respectfully request the opportunity to engage constructively on this issue and work toward solutions that support both accountability and solutions. Thank you for your consideration.

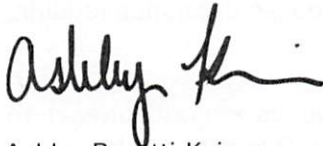
Sincerely,



Ana Gromis
Vice President of Government Affairs
Building Industry Association of Southern California



Matthew Hargrove
President & CEO
California Business Properties Association



Ashley Rozatti-Kaiser
Director of Government Affairs
Associated General Contractors of California



Mihran Toumajan,
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Chairman
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