

Guillen, Dora

From: Ana Gromis <agromis@biasc.org>
Sent: Friday, April 10, 2026 4:53 PM
To: Jabbar, Al; Hahn, Charles; Goebel, Yasie; Campbell, Tara; Anas, Nick; Napuri, Alyssa; COB_Response
Subject: BIAOC Comment Letter re: Agenda Item S43A
Attachments: BIAOC Letter re Item S43A_4_10_26.pdf

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Good Afternoon Chair Chaffee and Supervisors,

Please see the attached correspondence on behalf of BIAOC, requesting a continuance of Item S43A (agendized for 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



Ana Gromis
Vice President of Government Affairs

Building Industry Association of Southern California, Inc.

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BUILDING INDUSTRY OF SOUTHERN CALIFORNIA, ORANGE COUNTY CHAPTER

April 10, 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 Building Industry Association of Southern California, Orange County Chapter—representing hundreds of homebuilders, 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. Advancing a measure of this consequence without engagement from the building, contractor, and business community is deeply concerning and inconsistent with transparent, informed policymaking.

At a time when California is facing a severe and well-documented housing crisis, public policy should be singularly focused on removing barriers to housing production—not creating new ones. This ordinance moves in the opposite direction. It imposes additional burdensome, and possibly impractical requirements that will slow development, increase costs, and ultimately hinder the delivery of much-needed housing.

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 housing production and 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 housing production.

Thank you for your consideration. Should you have any questions, please do not hesitate to contact me at agromis@biasc.org or 949-777-3856.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ana Gromis', with a stylized flourish at the end.

Ana Gromis
Vice President of Government Affairs
BIASC