

**APPENDIX A**  
**Proposed Revisions to Terms of Construction Permit and Haul Route Expiration**

**1) PLAN CHECK EXPIRATION**

Require LADBS to expire plan check. Current regulations allow for an overabundance of discretion. The application of regulations seems the exception rather than the rule.

**Applicable regulations:**

1. Per LAMC Sec. 98.0603, plan check shall expire if permits are not secured within 18 months after plans have been filed.
2. Per LADBS Document P/BC 2017-120, at the discretion of plan check supervisor additional (3) 6-months extensions are allowed in addition to 18 months stipulated in LAMC Sec. 98.0603, total of 3 years for completion of plan check. Haul route approval remains valid through the plan check extension period.

**Proposed modifications:**

1. Enforce Item 1.
2. Provide tools that automatically generate alerts two weeks before plan check expiration date instead of relying on plan checkers to do it. Require LADBS to act upon the alerts.
3. Limit extension of plan check to maximum 6-months.
4. Extension process shall be transparent and rule-based rather than discretionary. Each request for extension must have substantiated with reasons that are publicly-available. Significant revisions to design should require new application for plan check.
5. Prohibit plan check extension after plan check has expired.

**Current state of affairs:**

At present we are not aware of plan check being expired.

## 2) PERMIT EXPIRATION

Require LADBS to expire already issued outdated permits immediately and to revoke permit extensions that were erroneously issued after permits were officially expired. Applicants must reapply for new permits under the current governing codes and regulations.

Currently permits continue to remain active or are reactivated without meaningful reasons. Here are a few examples.

### **8673 Franklin/1601 Mountcrest**

Fence installed, no other activity has been observed for months yet permits remained active.

### **8685/8689 Franklin**

Grading permit 15030-30000-08811 was issued in June 2016, was expired in July 2018, and reactivated in Feb. 2019.

Permits 15010-30000-04625, 15030-30000-08811, 15020-30000-03518 and 15047-30000-02100 were issued in June of 2016. Partial pre-inspection was conducted in May of 2018, after the date when permits should have been expired due to inactivity.

### **8555 Hedges**

Grading permit 16030-10000-06657 issued on 4/14/2017, voided on 3/4/2019, reactivated on 3/21/2019.

### **Applicable regulations:**

1. Per LAMC Sec. 98.0602(a), permits are valid for 24 month after the date of issue and expire after 180 days if permitted work has not commenced.
2. Per Assembly Bill 2913, permits remain valid if the work on the site authorized by that permit is commenced within 12 months after its issuance. Applies to permits issued after September 21, 2018.
3. Per current LADBS practices, a project is expected to be 75% complete 24 months after permits were issued. Exceptions to this Section allows extension of permits in case of unusual construction difficulties.
4. Per LAMC Sec. 98.0605, requests for permit extensions shall not be made later than 30 days after the expiration time per sections above.
5. Per LAMC Sec. 106.4.4.3, if a project was inactive for 180 days, the owner is given notice and has 90 days to obtain new permits to complete required work.

### **Proposed modifications:**

1. Enforce Items 1, 2 and 3.
2. Provide tangible criteria for determining a degree of project completion for Item 2 above.
3. Provide tools that automatically generate alerts two weeks before permit expiration date instead of relying on inspectors to do it. Require LADBS to act upon the alerts.
4. Make permit extensions for projects with any discretionary requests a transparent process (proper notification of interested parties, hearings). Any claim of construction difficulties and financial hardship has to be thoroughly substantiated (bank statements, loan documents, etc.) with all information made available to the public.
5. Make permit extension for by-right projects that are *5000 sf or larger* (review criteria) a transparent process (proper notification of interested parties, hearings).
6. Prohibit permit extensions for expired permits.
7. Installation of temporary fence or pre-inspection meeting with the grading inspector may not be considered a construction activity for the purpose of determining the date of permit expiration.

### **3) HAUL ROUTE EXPIRATION AND REVOCATION**

Create a process to invalidate existing haul routes for:

1. Projects that did not obtain grading permits within 12 months from the time of haul route final approval.
2. For project with expired grading permits.
3. For projects with expired plan check.

Presently LADBS does not make BBSC aware of expired grading permits and haul routes appear active on BBSC website for all listed projects.

**9210 Robin Dr.**, BF#160021 is an example of a site where grading permits and haul routes have been revoked but appear active on BBSC website  
[https://www.ladbs.org/docs/default-source/publications/misc-publications/importexport-route-\(haul-route\)-requests-status-table.pdf?sfvrsn=219](https://www.ladbs.org/docs/default-source/publications/misc-publications/importexport-route-(haul-route)-requests-status-table.pdf?sfvrsn=219)

**Applicable Regulations:**

1. Condition listed in every Final Action Letter of approval by BBSC.
2. Per LAMC Sec. 98.0602(a) – see above

**Proposed modifications:**

1. Revise current protocol of communication between the LADBS (Grading Department) and BBSC: upon receiving a notification from the LADBS's Inspection Bureau regarding expiration of grading permits BBSC shall invalidate respective haul routes.
2. Revise the Haul Route Requests Status Table: add a column to indicate that a haul route has been revoked.

**4) HAUL ROUTE APPROVAL**

The entire process of haul route approval shall be executed by LADBS instead of the Department of City Planning.

For new projects, BBSC shall not accept applications for haul routes approval for projects that do not have issued grading permits. To assure that grading permits do not expire before the hearing is scheduled, timeline for haul route approval process shall be revised.

Currently the BBSC approves environmental review or grants categorical exemptions from environmental review for each applicant during the haul route hearing. Projects apply for haul routes before grading permits are issued. By the time hauling commences, environmental conditions for the project site may change drastically and previously approved documents become outdated.

Some examples:

**9161 Oriole Way, BF#160104**

Approved in March of 2017. Demolition completed in June of 2019. Hauling has not started yet.

**9196 Thrasher BF#160085**

Approved in June of 2017. Construction, including hauling, has not started yet.

## **5) SALE OF PROPERTY AND HAUL ROUTE EXPIRATION**

In order to decrease potential volume of expired permits and haul routes, prohibit haul routes to be sold with the property unless at the time the property is put on the market excavation has already commenced.