

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: October 28, 2025

TO: Los Angeles City Planning Staff;
Subdivision Committee;
Interested Parties

FROM: Vincent P. Bertoni, AICP, Director of Planning
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SUBJECT: **Implementation of Senate Bills 1123 (2024) and 684 (2023) and Assembly Bill 130 (2025) - Starter Home Revitalization Act - Streamlined Subdivision Review for Housing Development Projects with 10 or Fewer Units**

The Starter Home Revitalization Act of 2021 (SHRA) was recently amended by Senate Bill (SB) 1123 and Assembly Bill (AB) 130, both of which took effect on July 1, 2025. Previous amendments to the SHRA from SB 684 took effect on July 1, 2024. The SHRA establishes a ministerial approval process for a parcel map or a tentative and final map for a subdivision resulting in 10 or fewer parcels and corresponding housing development projects of 10 or fewer units. Eligible project applications for a parcel map or tentative map and or housing development are not subject to discretionary review or a public hearing and must be approved or denied within 60 days following receipt of a completed application.

This memorandum outlines the Starter Home Revitalization Act and its implementation by the Los Angeles City Planning (LACP) and other city departments involved in the subdivision process. It is divided into three sections: the first summarizes eligibility criteria, the second details objective standards applicable and non-applicable to qualified projects, and the final section describes the SHRA project application process. This memo pertains to Chapter 1 of the Zoning Code. A subsequent memo specific to Chapter 1A of the Zoning Code will follow.

This memo summarizes key SHRA provisions for reference and does not include all applicable planning, building, or other departmental/agency regulations. It reflects LACP's current understanding based on available information and may be updated based on subsequent guidance. This memo updates and replaces the prior SB 684 memo, issued by LACP on October 9, 2024, to reflect changes to State law that are now effective. Please refer to California Government Code Sections (GCS) 65852.28, 65913.4.5, and 66499.41 for the full SHRA.

I. Starter Home Revitalization Act (SHRA) Property Eligibility Criteria

GCS 66499.41 outlines the eligibility criteria for streamlined subdivision map processing under the SHRA. A summary of these provisions is provided below. To evaluate site eligibility, please consult the SHRA Eligibility Criteria Checklist, located under the “Planning and Zoning” tab in ZIMAS (<https://zimas.lacity.org>). City Planning will confirm eligibility.

A proposed subdivision may create no more than 10 parcels and 10 residential units, excluding any proposed remainder parcel and any Accessory Dwelling Units (ADUs) or Junior ADUs (JADUs). More information about remainder parcels and ADUs/JADUs can be found in the Frequently Asked Questions (FAQ) Section (Q. 8 and 23).

To qualify, multifamily-zoned lots must be less than 5 acres, and single-family zoned lots must be under 1.5 acres and "vacant." (See FAQ Section, Q.1.) Newly created parcels must be at least 600 square feet (sq. ft.) in multifamily zones and 1,200 sq. ft. in single-family zones. These minimum parcel sizes control the maximum number of lots and units that may be created (within the 10 unit maximum). However, local zoning density standards apply to each newly subdivided lot individually. For more information on how density is calculated after subdivision, see the “Allowable Density” section on page 5 below.

Eligible sites must be substantially surrounded by qualified urban uses, as defined in GCS 66499.41(a)(2)(B). Lots previously recorded pursuant to the SHRA or SB 9 (2021) are ineligible. However, this particular eligibility restriction does not apply if the tentative map has not been recorded.

Housing units proposed under the SHRA must be developed under one of the following ownership structures listed in GCS 66499.41(a)(4):

- (i) fee simple ownership lots;
- (ii) units within a common interest development (e.g., condominiums);
- (iii) housing cooperatives as defined in Civil Code Section 817;
- (iv) community land trusts as defined under SHRA; or
- (v) tenancy in common arrangements consistent with Civil Code Section 685.

In addition, the average total area of floorspace of all proposed units on the lot to be subdivided must not exceed 1,750 net habitable square feet (see FAQ Section, Q.13). This floorspace cap applies at the time of initial development approval and construction. It does not restrict additions or renovations to individual units that occur after Certificates of Occupancy have been issued. SHRA projects must also comply with any applicable local inclusionary housing requirements, such as those in effect for the Central City West Specific Plan or the Downtown Community Plan Area.

Minimum Density and Affordability Requirements for Housing Element Sites

Pursuant to GCS 66499.41(a)(5), all SHRA development projects proposed on sites identified in the City’s 2021-2029 Housing Element must result in *at least* the number of units projected for that parcel. This would apply to the following site categories identified in Chapter 4 of the 2021-2029 Housing Element: (i) Appendix 4.1 - Inventory of Adequate Sites, (ii) Appendix 4.2 - Public Development Pipeline Projects, and (iii) Appendix 4.3 - Private Development Pipeline Projects. Of note, this is not the same collection of sites covered by the Housing Element Sites definition in Los Angeles Municipal Code (LAMC) Sec. 16.70

B. In particular, this SHRA requirement does not apply to the rezoning sites list adopted by the City Council in February 2025 (Council File 21-1230-S6).

If a parcel in Appendices 4.1 - 4.3 is identified to accommodate any portion of the City's Regional Housing Needs Allocation (RHNA) for lower income households, the project must include at least the number of lower income units projected for that site. Please see Q.9 in the FAQ Section for additional guidance on how to determine whether a parcel is listed as a Housing Element Site and what unit or affordability requirements apply.

Minimum Density Requirements for Non-Housing Element Sites

SHRA projects located on parcels not listed in the Housing Element appendices listed above are subject to *the greater* of the following minimum density requirements:

- (i) 66% of the maximum allowable residential density permitted by local zoning (if specified), or
- (ii) 20 dwelling units per acre (i.e. 66% of 30 DU/acre), which equates to 1 unit per 2,178 sq. ft.

As a general rule, this will require projects to have a minimum density of one unit per 2,178 sq. ft. of lot area, unless the parcel is located in the R3 or less restrictive zone (e.g., R4, RAS, or commercial zones), where higher maximum allowable densities would apply. However, the area of any designated remainder parcel or any required land dedications shall be excluded from this calculation. These density calculations are rounded down to the next whole number. (see Q. 24).

ADUs and JADUs may count toward the minimum density requirements for both Housing Element and Non-Housing Element Sites, including any units required to be made available for lower income households. However, these units must meet applicable provisions in the [Fair Housing Requirements for Affordable Housing](#) pursuant to LAMC Sec. 16.61 B (e.g. unit mix, unit size, quality and amenities, etc). For ADUs and JADUs, the "unit size" provision should be interpreted to require comparability only between the restricted ADU and its associated primary dwelling on the same lot, but not between the ADU and primary units located in separate buildings or lots.

Demolition Protections

GCS 66499.41(a)(8) includes provisions that aim to protect affordable housing and prevent the displacement of tenants. Specifically, a project may not be approved if it would require the demolition or alteration of any of the following types of housing:

- 1) Housing that is subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low, very low, or extremely low income;
- 2) Housing subject to any form of rent or sales price control imposed by a local public entity's valid exercise of its police power (e.g., the Rent Stabilization Ordinance (RSO)); or
- 3) Housing that has been occupied by a tenant within the five years prior to the application date, including, including housing that has been demolished or that tenants have vacated.

Please note that multifamily building permits issued since January 2023 may be reviewed to ensure these types of housing have not been demolished or altered for the purposes of using the SHRA project.

Pursuant to SB 1123, any existing dwelling units on the property may not be legally separated as part of a SHRA subdivision. This prevents multifamily properties subject to the RSO from losing their status and prohibits condo conversions of legally existing units. In addition, the development may not be located on parcels where an Ellis Act withdrawal of units has occurred within 15 years of the application (see the ZIMAS eligibility checklist noted above).

All housing replacement requirements and review procedures from the Housing Crisis Act of 2019 (HCA) and Resident Protections Ordinance (RPO) (LAMC Sec. 16.60) will still apply to any SHRA project that would result in the demolition of one or more residential units.

SHRA projects that have, or will require demolition of a single-family dwelling not subject to any of the above conditions may provide a signed [No Net Loss Declaration](#) (CP-4069) to certify compliance with the HCA/RPO as well as the SHRA's demolition protections. Please keep in mind that any incorrect information provided on the No Net Loss Declaration may result in a revocation or denial of the SHRA project.

SHRA projects that do not qualify for a No Net Loss Declaration may require a Replacement Unit Determination from the Los Angeles Housing Department.

Please email lahd-landlorddeclarations@lacity.org if you have additional questions concerning their review processes.

Environmental Criteria

The SHRA includes several provisions that either prohibit or restrict eligibility for sites located in environmentally sensitive areas. Please consult the SHRA Eligibility Checklist in ZIMAS to determine if a site is located in any of the following prohibited and/or restricted areas.

First, SHRA projects may **not** be located on the following site categories:

- 1) Prime farmland or farmland of statewide importance;
- 2) Wetlands (see CA Department of Fish and Wildlife);
- 3) High or very high fire hazard severity zones, as referenced in GCS 51178 and Public Resources Code Section 4202¹.
- 4) Land identified for conservation in an adopted natural community conservation plan;
- 5) Habitat for protected species; or
- 6) Lands under a conservation easement.

The following site categories may only utilize SHRA streamlining if applicable conditions or standards have been met:

- 1) Hazardous waste sites (see [Los Angeles Fire Department CUPA](#));
- 2) Special flood hazard areas and regulatory floodways (see [LADBS Flood Hazard Management Ordinance Bulletin](#)); and
- 3) Earthquake fault zones (see LADBS Information Bulletins [P/BC 2023-129 and P/BC 2023-044](#)).

¹ Please note this includes both state and local responsibility areas.

Please see GCS 66499.41(a)(9) for more information about these site limitations as well as any specific conditions or standards needed to verify eligibility.

II. Application of Objective Standards for the SHRA

GCS 65852.28 and 66499.41 establish the objective standards that apply to subdivisions and housing development projects eligible under the SHRA. These sections identify the types of standards that *cannot* be applied because they have been superseded by the SHRA, as well as those standards that *may* be applied unless they conflict with the physical preclusion provisions in GCS 65852.28(b)(2)(A). They also specify the written findings a local agency must make to deny a qualifying project (see FAQ Section, Q.7 & Q.11).²

The following paragraphs summarize key SHRA provisions and applicable local objective standards. However, this is not an exhaustive list of all planning or building regulations that may apply to SHRA projects.

Local Objective Standards That *Cannot* be Applied

Allowable Density

HCD has issued Technical Assistance letters to Oakland (February 19, 2025) and Morro Bay (May 5, 2025) clarifying that local density limits cannot be used to prohibit the creation of up to 10 parcels or 10 units when otherwise allowed under SHRA minimum parcel size provisions. Maximum allowable density is therefore primarily determined by the number of 600 sq. ft. (multifamily zones) or 1,200 sq. ft. (single-family zones) lots that could fit on an eligible site. However, if the zone's minimum area per dwelling unit permits more than one unit on the subdivided lot, then the allowable density may be higher.

The allowable density for condominiums and other for-sale multifamily ownership structures is calculated differently because these projects are subdividing airspace - not land. As such, the allowable density in these projects is either the maximum number of units allowed by local zoning or 30 units per acre, whichever is greater. These projects are still limited to 10 primary dwelling units (not including ADU/JADUs) and are only permitted in zones where multifamily dwellings are an allowable use.

Rear/Side Lot Line Setbacks

Any side or rear setback imposed from the original property lines of a pre-subdivided lot must comply with GCS 65852.21(b)(2)(B). This section prohibits local agencies from requiring setbacks greater than four feet from the original side or rear lot lines, and from imposing setbacks on existing structures—or new structures built in the same location with the same dimensions as an existing structure.

Building Separation / Passageways / Setbacks Between Units

Per GCS 65852.28(b)(2)(C), no zoning setbacks or other building separation requirements between the units may be enforced. This includes setbacks between units on the same lot as well as between units on the newly created lots, including any yard or passageway that would normally be required by the

² See [HCD Technical Assistance and Enforcement Letters](https://www.hcd.ca.gov/planning-and-community-development/accountability-and-enforcement) <https://www.hcd.ca.gov/planning-and-community-development/accountability-and-enforcement>

LAMC (including 12.21 C.2). However, any building separation requirements from the California Building Code would still apply.

Parking Requirements

Automobile parking requirements for SHRA projects may not exceed the limits set by SB 9 in GCS 65852.21(c)(1). This section prohibits local agencies from requiring more than one parking space per SHRA unit. However, no on-site parking spaces can be required if the site is within one block of a car share vehicle³ or is within one-half mile walking distance from a high quality transit corridor or a major transit stop.⁴ Finally, GCS 65852.28(b)(2)(D) prohibits local agencies from imposing any requirements that on-site parking be covered or enclosed.

Minimum Lot Size, Width, Frontage or Depth

GCS 66499.41(b)(1) prohibits the City from imposing any minimum lot size, width, depth, or frontage standards beyond those specified in the SHRA (i.e. 600 sq. ft. for parcels zoned for multifamily use and 1,200 sq. ft. for those zoned for single-family use).

Frontage standards are generally understood to refer to requirements for a lot to front or abut a public right of way, or a private street, or an alley if it is approved by a subdivision map. This includes provisions in the definition of a “Lot” in LAMC Sec. 12.03, which require that a lot front for at least 20 feet on a street or private street easement and that it maintain a minimum 20-foot wide access strip. (See the Access section below for more information on how lot access may be provided through alternative means.)

Floor Area Ratio (FAR)

GCS 65852.28(b)(2)(G) prohibits local agencies from imposing a FAR standard of less than 1.0 for projects with 3 to 7 units, or less than 1.25 for projects with 8 to 10 units. These minimum state FAR standards will apply when they permit more than the local zoning FAR standard, which is mostly the case in single-family zones. FAR should be calculated as normal per the applicable zoning.

Standards that Apply Solely or Partially to SHRA Projects

GCS 65852.28(b)(2)(B) prohibits cities from imposing any requirement that applies to a project solely or partially on the basis that the subdivision or housing development receives approval pursuant to the SHRA.

Local Objective Standards That Can be Applied

Beyond the standards explicitly preempted by state law (described above), the City may impose objective zoning, subdivision, or design standards related to the design, improvement, or development of a housing development, provided these standards do not conflict with the SHRA.

However, pursuant to GCS 65852.28(b)(2)(A), local agencies may *not* impose any zoning, subdivision or design standard that would physically preclude development at the “protected density,” which is defined

³ Please see Q.10 in the FAQ Section for more information.

⁴ “High quality transit corridor” and “major transit stop” are defined in Public Resources Code Sections 21155(b) and 21064.3 respectively. Please reference the SHRA Eligibility Checklist in ZIMAS to determine if a site qualifies for one of these exceptions.

as *either* (i) 30 units per acre (or 1 unit per 1,452 sq. ft. of lot area), or (ii) the maximum density allowed by the underlying zoning, whichever is greater⁵. Projects at or below this density are protected by the SHRA's physical preclusion language, while projects exceeding this density are not. Protected density calculations that yield a fractional number shall be rounded down to the next whole number. Development proponents may also utilize LAMC 12.22 C.16 to include one-half the width of any abutting alleys in the guaranteed density calculation when utilizing the underlying zoning. Local agencies are also prohibited from enforcing any local standard that would have the effect of imposing any of the other prohibited standards in GCS 65852.28(b)(2).

Development proponents may make a written request in their application to waive or modify a local standard(s), to the minimum extent required, by identifying the standard and demonstrating how its application would physically preclude an otherwise SHRA-compliant housing development (i.e., a project that complies with allowable density and floor area). Applicants are encouraged to complete their Preliminary Zoning Assessment (CP13-4064) before submitting this request to obtain a full accounting of all applicable zoning standards. If waiver or modification requests are denied or modified by the Advisory Agency, an explanation will be included in the Letter of Compliance detailing why application of the development standard(s) did not physically preclude the project.

The Advisory Agency may also exercise its LAMC authority⁶ to grant adjustments or deviations from development standards. However, the granting of such requests is not required. Denial of a requested adjustment or deviation shall not affect the project's eligibility for ministerial approval under the SHRA (See FAQ Section, Q.3 for more information). Please see the *Related Concurrent Adjustment Actions* section in the Preliminary Parcel Map Filing Instructions & Checklist (CP13-1801) or the Tentative Tract Map Filing Instructions & Checklist (CP-6110) forms for more information.

Height

LAMC building height requirements will generally apply to SHRA projects. Notwithstanding the protected density provision, GCS 65852.28(b)(2)(A)(ii) allows the City to deny requests for relief from height limits in single-family zones. As such, any request to modify height standards in a single-family zone must include additional justification and will be subject to Planning Department discretion.

Dedications of Rights-Of-Way and Off-Site Improvements.

GCS 65913.4.5(a)(3) of the SHRA permits local governments to require dedications of rights-of-way or the construction of off-site improvements as conditions of approval for Parcel or Tract Maps associated with SHRA projects. A security deposit such as a bond may be required to ensure the faithful performance of such requirements but the cost shall not exceed 300 percent the estimated costs of the improvements or of the acts to be performed.

Importantly, a required right-of-way dedication may not preclude the development at a project's protected density. Furthermore, Assembly Bill 3177 (2024) limits the City's ability to impose land dedication on housing development projects to widen a roadway to mitigate vehicular traffic impacts, achieve an adopted traffic level of service related to vehicular traffic, or achieve a desired roadway width. Exceptions

⁵ See GCS 65852.28(b)(2)(A)(ii) and HCD technical assistance letters to the City of Oakland and City of Morro Bay, dated February 19, 2025 and May 5, 2025 respectively.

⁶ Including but not limited to LAMC Sections 17.03 A (yards, height, area and passageway) and 17.05 (design standards) of Chapter 1 as well as 13B.7.3 (Tract Maps) and 13B.7.5 (Parcel Maps) of Chapter 1A.

to this prohibition must be consistent with GCS 66005.1(c). In addition, GCS 66005.1(c) does not prevent the City from requiring dedications for sidewalks and other public improvements, or requiring the construction of improvements where dedication is not required.

Access

As noted previously, the SHRA was amended by SB 1123 to prevent local agencies from enforcing lot frontage standards, including the lot strip access contained in the definition of a “Lot” in LAMC Sec. 12.03. However, other access requirements may apply, including those relating to emergency response and utility access. For example, the Fire Department may require that fire apparatus be able to reach within 150 feet of all portions of a building’s exterior walls, unless alternate means of fire protection (such as sprinklers or a fire lane) are approved. Similarly, access standards may be needed to accommodate utility connections, waste collection, and other services. The City encourages early coordination with the respective agencies on these matters.

The City’s Small Lot Subdivision (SLS) Ordinance, including the Small Lot Map Standards, offers a useful framework for addressing access, including pedestrian and vehicular access easements, alley access and utility easements. SHRA projects may request to utilize SLS frontage and access provisions without being subject to other SLS requirements. Additionally, driveway access is not required if the project does not include any automobile parking spaces. Pedestrian access may also be provided through a 3-foot pedestrian access easement. Finally, objective zoning, subdivision, or design standards pertaining to lot access cannot be imposed if they would physically preclude the development of a project built to its protected density.

Open Space

LAMC Sec. 12.21 G. establishes open space and landscaping requirements for residential developments with six or more dwelling units on a single lot. However, this requirement would only apply to a SHRA project that proposed more than five units on a single newly created lot.

Protected Trees and Street Tree Removals

All subdivision of land applications must include a Tree Disclosure Statement ([CP-4067](#)). Additional documentation, such as a Tree Report ([CP-4068](#)) prepared by an arborist, may also be required depending on site conditions. Protected trees and shrubs may not be relocated or removed as part of a subdivision unless approved by the Advisory Agency in accordance with LAMC Sec. 17.05 R, which requires either 4:1 replacement for any removed protected tree, or its relocation elsewhere. Alternatively, removal may be permitted through a separate tree removal permit process, as outlined in Article 6 of Chapter IV of the LAMC. Removal of street trees must be approved by StreetsLA. Additionally, LAMC Sec. 17.08 F requires subdivisions to work with StreetsLA to either plant street trees or pay an in-lieu fee, in coordination with StreetsLA.

The LAMC’s discretionary tree removal permit provisions must be reconciled with the SHRA’s requirements for ministerial approval and protected density. While public hearings and CEQA review are generally not required for tree removals tied to SHRA projects, objective standards—such as tree replacement ratios—still apply unless they would physically preclude development at the protected density or otherwise conflict with the SHRA. Given the Advisory Agency’s authority to modify zoning and subdivision standards, applicants are encouraged to develop project designs that preserve protected or

other significant mature trees and may request modifications that would result in similar building sizes as would have been available without preserving the tree.

Front Yard Setbacks

The SHRA does not prohibit local agencies from applying objective setback standards from the front lot line of the pre-subdivided lot. The City's base yard setback regulations are established in the area regulations of the zone (e.g. LAMC §§ 12.08 C.1, 12.09 C.1). Additionally, preliminary parcel maps for four units or less on sites less than one acre in RA or R zones must maintain the original front yard of the pre-subdivided lot per LAMC Sec. 12.21 C.1(e). For new subdivisions, the Advisory Agency may exercise limited discretion to establish and modify yards as part of a map approval, as discussed on page 7.

Small Lot Design Standards

If a project opts into the City's Small Lot Subdivision (SLS) Ordinance in combination with their SHRA project, the objective standards of the City's Small Lot Design Standards ([CP-6975](#)) would apply, as well as any applicable allowances. Compliance with these standards is conducted through an administrative review, consistent with SHRA's ministerial processing requirement (e.g. no public hearing and subject to SHRA's review timelines). Please see Q.10 in the FAQ Section for more information on the application of SLS Ordinance standards.

Because the SLS Ordinance is a very similar housing typology as the SHRA, many of the provisions of the ordinance may be relevant when the Advisory Agency is considering modifications and waivers of zoning code provisions. Standard zoning code provisions that are not well suited for small lot projects including lot access, passageways and lot coverage - all of which have alternative provisions in the SLS Ordinance that may be requested through the application process without opting into the SLS Ordinance (either as a "protected density" waiver/modification request, or through a specified Advisory Agency's authority).

III. Application Process for Submitting a SHRA Project

Effective July 1, 2025, a development proponent may submit a SHRA application for projects located on newly eligible parcels pursuant to SB 1123. SHRA projects will be administratively reviewed for compliance with applicable objective criteria and will not be subject to a public hearing or appeal. Additionally, the California Environmental Quality Act (CEQA) will not apply and project determinations may not be appealed. However, public hearings will be required for projects located in the California Coastal Zone (see FAQ Section, Q.13 for more information).

An application for a parcel/tentative map for a housing development project or a housing development project submitted pursuant to the SHRA must be approved or denied within 60 days from the date the local agency receives a completed application. If the local agency does not approve or deny a completed application within 60 days, the application shall be deemed approved. Thereafter, the project process will follow the normal final map recordation timelines.

The normal 30-day deadline to determine completeness under the Permit Streamlining Act will also apply to SHRA projects. If the City deems an application incomplete within 30 days of submission, the 60 day clock does not begin until a completed application is received. Importantly, the 60 day clock will begin on

the date a completed application is received (including payment of fees) - not the date when the City confirms an application is complete⁷.

Regulations for Parcel and Tract Maps are located in Article 7 of the Zoning Code, including general provisions, map standards, and procedures for preliminary and final map approvals and modifications (see LAMC Ch. 1 17.50-17.58 and Ch. 1A LAMC Sections 13B.7.3 (Tentative Tract Map), 13B.7.5. (Parcel Map) and 13B.7.4 (Final Tract Map), 13B.7.6. (Final Parcel Map) of Chapter 1A). Additionally, the City's Small Lot Subdivision Ordinance can be found in LAMC Sec. 12.22 C.27 along with the Small Lot Design Standards Administrative Review form (CP-6975) on the City Planning forms webpage (see [here](#)).

A development proponent submitting a SHRA project that is also eligible for the Small Lot Subdivision (SLS) Ordinance (single-family and R2 zones are not eligible) may choose to opt into the provisions of the SLS Ordinance and be subject to all applicable provisions (except for standards eligible to be waived by the SHRA or other subdivision processes). These projects will receive both the Small Lot Subdivision (SL) and SHRA (SH) entitlement suffixes, while non SLS projects will only receive the SH suffix. A condominium project would receive a Condominium (CN) suffix and the SH suffix.

For detailed application instructions, please refer to the Preliminary Parcel Map Filing Instructions & Checklist (CP13-1801) for projects creating up to four new lots/units or the Tentative Tract Map Filing Instructions & Checklist (CP-6110) for projects creating five to ten new lots/units (excluding ADUs/JADUs) on the forms page (see [here](#)). Please note that a Geologic and Soils Engineering Report is required in Hillside, Seismic, or Liquefaction Areas (see [here](#)).

An appointment can be scheduled to submit an application at the public counter (see [here](#)). Once an application is filed, the project is assigned a case number and routed to the appropriate staff members to review.

Fees

The City Planning application fee will depend on whether the project requires a Parcel Map (up to four lots) or a Tract Map (five - ten lots). Additionally, SHRA projects that do not opt into or are ineligible for the SLS Ordinance will not be charged any fees related to the Administrative Small Lot Design Standards compliance review. Applicants are also advised to pay any fees required by other departments, such as the Bureau of Engineering Land Development Fee for Tentative/Preliminary Subdivision Maps, in a timely manner to allow for the required reviews to take place. SHRA applications will not be deemed complete until all required fees from other Advisory Agency departments are paid.

SHRA dwelling units will also be assessed any applicable development impact fees such as the LAUSD Developer Fee, Park Fee, and the Affordable Housing Linkage Fee. Quimby (In-Lieu) Fees will be calculated by the Department of Recreation and Parks after an applicant submits the [Park Fee Calculation Application](#) (more information [here](#)). The Affordable Housing Linkage Fee is calculated based on the "market area" of the City the project is located in and whether it is a single-family or multiple-unit development (see [here](#)). Small lot subdivisions consisting of multiple detached single-family dwellings will be considered single-family units for the purpose of Linkage Fee calculation. If the project is located

⁷[See HCD technical assistance letter to the City of Los Angeles dated December 11, 2024](#)

in a single-family zone and the new homes are each less than 1,500 square feet, an individual small lot may qualify for the exemption provided in LAMC Ch 1 Section 19.18 B.2(e)(2). Additionally, in any zone, the replacement of a detached single-family home that results in a net increase of no more than 1,500 square feet of Floor Area compared to the previously existing home may qualify for an exemption for one of the new units under LAMC Ch 1 Section 19.18 B.2(e)(3).

Projects requiring permit clearances or other procedures will be assessed additional fees, in addition to typical plan check, final map processing, and permit fees.

Early Start Building Permits

GCS 65913.4.5(a)(1) requires local agencies to issue building permits for SHRA projects if the applicant has received “...tentative map approval or parcel map approval for the subdivision.” and “...submitted a building permit application that the local agency deemed complete pursuant to subdivision (b) of Section 65913.3.”

Additionally, GCS 65913.4.5(a)(2) states that the City “...may condition the issuance of a building permit on the applicant submitting proof to the satisfaction of the local agency of a recorded covenant and agreement...that states that the applicant...agree[s] that the building permit is issued on the condition that a certificate of occupancy or equivalent final approval for the building will not be issued unless the final map has been recorded.” There is nearly identical language in LAMC Sec. 17.06(A)(2)(d) that allows for the issuance of “early start” building permits for Small Lot Subdivisions with the same condition regarding final map recordation. As such, the City will apply the policy outlined in GCS 65913.4.5(a)(2) to all SHRA projects. Please keep in mind that any permitted construction based on tentative map approval may need to be re-designed to account for any changes made to the final map.

Prohibition on Selling, Leasing or Financing

AB 130 (2025) updated GCS 66499.41(e) to allow cities to prohibit a person from selling, leasing, or financing any parcel resulting from a SHRA subdivision separately from the other parcels (except for the remainder parcel), unless each parcel meets one of the following criteria listed in GCS 66499.41(e)(1)(A):

- 1) The parcel contains an existing legally permitted residential structure, or at least one unit that was legally permitted at the time of construction.
- 2) The parcel is reserved for internal circulation, open space, or common area.
- 3) The parcel is the only remaining parcel within the subdivision not developed with a residential structure.

SHRA Projects within Overlays

Pursuant to GCS 65852.28(c)(1), all housing development projects and their associated subdivisions eligible for the SHRA shall be subject to a ministerial review process, including any related overlay reviews. All eligible housing development projects are still subject to any applicable objective zoning, subdivision, or design standards from the overlay unless the standard is explicitly precluded by the law or physically precludes a project at the protected density. Compliance with an overlay’s applicable

objective standards would be verified through a ministerial process. The ministerial overlay review shall be filed at the same time as the parcel or tentative tract map review.

Frequently Asked Questions (FAQ) Related to SHRA Implementation

Q.1 SB 1123 expands SHRA eligibility to lots that are “vacant and zoned for single-family residential development.” What does that mean?

- A. The SHRA defines “vacant” as a site that has no permanent structure at the time of application, unless the existing structure is abandoned and uninhabitable. A structure may be considered vacant or abandoned and uninhabitable if sufficient evidence exists to make that determination, consistent with the SHRA’s intent and a desire to minimize the presence of vacant land and prevent unnecessary demolitions (when projects aren’t able to be constructed).

Documentation relating to abandonment may include, but is not limited to: (i) At least 180 consecutive days of vacancy based on LADWP or other utility service records; (ii) Structure visibly boarded up, fenced off, or otherwise secured (with date-stamped photos); (iii) Record of being declared a public nuisance by the Board of Building and Safety Commissioners; (iv) Records of repeated break-ins, squatting, or vandalism;

Documentation of lack of habitability may include, but is not limited to: (i) An unresolved Notice and Order to Vacate or Order to Comply related to habitability issued by the Los Angeles Department of Building and Safety (LADBS); (ii) Lack of active utility connections; (iii) Official records or inspection reports documenting lack of habitability; (iv) Absence of a valid Certificate of Occupancy; (vi) Insurance documentation of a total loss; (vii) Inspection reports indicating hazardous conditions (e.g., asbestos, lead paint, biohazards) that prohibit lawful occupancy.

An existing dwelling that qualifies as “abandoned and uninhabitable” at the time of application does not need to be demolished for the site to maintain SHRA eligibility. In this instance, the existing dwelling may be rehabilitated and included as part of the subdivision or as a remainder parcel. The SHRA also does not consider “vacant” any of the types of housing protected from demolition or alteration (see pg. 3) and expands this to for-sale restricted affordable units in addition to rental.

Zoned for single-family residential development means sites in the following zones: A1, A2, RA, RE, RS, R1, RU, RZ, and RW1.

Q.2 Can development proponents utilize State Density Bonus or other affordable housing incentive programs in conjunction with a SHRA project?

- A. Yes, development proponents may utilize an affordable housing incentive program in conjunction with a SHRA project. This includes the State Density Bonus Program (LAMC Section 12.22 A.37), a program from the recently adopted Citywide Housing Incentive Program Ordinance (Ordinance 188,477), or any other local incentive program in the LAMC, a Community Plan Implementation Overlay, or a Specific Plan. These projects will need to meet all applicable requirements from

both the SHRA and incentive program. Additionally, any lower-income units provided to meet the SHRA's Housing Element Site requirements may be utilized to qualify for an incentive program.

SHRA projects that utilize this option will be subject to the following provisions:

- Projects cannot exceed 10 dwelling units (not including ADUs/JADUs or any existing units located on a remainder parcel).
- Development proponents may only request incentives or waivers from local development standards and not SHRA standards or requirements.
- No public hearings may be required.
- The application for the affordable housing incentive program shall be filed simultaneously as the SHRA project.
- "Maximum allowable residential density" in GCS 65915 (Density Bonus Law) means the greatest number of units allowed by local zoning or the general plan - not the allowable SHRA density. The number of bonus units shall be calculated this way for any SHRA project filed concurrently with an incentive program that follows state density bonus procedures.

Q.3 Can any allowance or authority given to the Deputy Advisory Agency by the LAMC be exercised in combination with a SHRA project?

- A. Yes. The Deputy Advisory Agency has the authority to conditionally approve, modify, or waive development standards related to subdivision design, improvements, easements, lot configuration, dedications, and other map-related requirements, provided such actions are consistent with applicable findings, public health and safety, and applicable state law such as the Subdivision Map Act and the SHRA⁸.

Q.4 The Baseline Mansionization Ordinance (BMO) and Baseline Hillside Ordinance (BHO) added several residential development standards specific to single-family zones. Are any of those standards preempted by the SHRA?

- A. The BMO and BHO development standards were intended to limit the bulk and massing of residential structures in single-family zones. However, these development standards were explicitly designed for detached single-family dwellings in zones with at least 5,000 square-foot minimum lot areas. Consequently, some of these regulations are not well-suited for the development typologies allowed by the SHRA. Here is a breakdown of some of the most pertinent BMO development standards and how they interact with the townhome style/small lot developments we expect will be most common under the SHRA.
- *Residential Floor Area Ratio (RFAR)*: RFAR standards in the BMO and BHO vary by lot size and zone, but do not exceed 0.65. As previously noted, the SHRA prohibits local agencies from imposing a FAR below 1.0 for 3 to 7 unit projects and 1.25 for 8 to 10 unit projects. The net habitable square footage is not used for this calculation.

⁸ Including but not limited to LAMC Sections 17.03 A (yards, height, area and passageway) and 17.05 (design standards) of Chapter 1 as well as 13B.7.3 (Tract Maps) and 13B.7.5 (Parcel Maps) of Chapter 1A.

- *Encroachment Plane:* Projects in R1 or R1 Variation Zones require a 45 degree angled plane toward the lot interior that originates at a specified height above the front and/or side yard setback. Building mass cannot extend beyond the encroachment plane. However, the SHRA prohibits local agencies from requiring any setbacks or distance between the units (except as required by the CA Building Code). This prohibits enforcement of the encroachment plane requirement anywhere the dwelling units directly abut.
- *Maximum Lot Coverage:* Projects in R1 Variation Zones are subject to a maximum lot coverage standard of 50 percent for lots up to 6,000 square feet. The SHRA does not explicitly preempt this standard, but a 50 percent maximum lot coverage requirement on new lots that don't have to exceed 1,200 square feet *may likely* have the effect of imposing a FAR below 1.0 or 1.25 and prevent a housing development at the protected density permitted by GCS 65852.28(b)(2)(A).
- *Side Wall Offset/Plane Break:* In R1 and R1 Variation Zones, the BMO requires all portions of a building with a side wall more than 14 feet in height and a continuous length greater than 45 feet must provide a plane break at least 5 feet in depth beyond the required side yard. This plane break must be at least 10 feet in length. The SHRA's prohibition on imposing setbacks from the original side lot lines beyond four feet would preempt the plane break requirement along any portion of the required side lot line setback. The SHRA's prohibition on applying setbacks between units would also preempt the plane break requirement anywhere the units directly abut.

Q.5 Can a development proponent pursue a SHRA project following approval of a discretionary parcel or tract map entitlement? Can SHRA projects propose the merger & re-subdivision of lots?

- A. Yes, as long as the final map for the discretionary entitlement is recorded prior to the SHRA application. Consistent with the City's existing parcel and tract map processes, SHRA projects may propose the merger and re-subdivision of lots in the same application.

Q.6 What does ministerial approval mean?

- A. A ministerial approval process is non-discretionary and administrative in nature and shall be based on objective standards only (see below). For SHRA purposes, a ministerial project is not subject to discretionary review, a public hearing, CEQA, or the right to appeal.

Q.7 What are objective standards?

- A. "Objective zoning standards", "objective subdivision standards", and "objective design standards" are standards that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal [see GCS 66300(a)(7)]. Examples include numeric and fixed standards such as heights or setbacks, or design standards such as specific dimensions or materials. Subjective standards require judgment and can be reasonably interpreted in multiple ways.

Q.8 Will ADUs or JADUs be allowed in SHRA projects? Are there any restrictions?

- A. GCS 66499.41(g) permits local jurisdictions discretion in how and whether to permit ADUs or JADUs on parcels created pursuant to the SHRA. The City of Los Angeles will allow these projects to include ADUs and/or JADUs in multi-family zones, and only JADUs in single-family zones, subject to the restrictions noted below.

In fee simple SHRA projects, only one attached ADU or JADU will be allowed on each new parcel. However, all normally applicable provisions of the City's ADU Ordinance or State ADU law will apply to multi-family SHRA projects.

Q.9 What are the requirements for sites listed in the 2021-2029 Housing Element? If a site is listed, where can I find the number of projected units or lower income unit requirements?

- A. As previously noted, GCS 66499.41(a)(5) requires that all SHRA projects located on Housing Element Sites must result in at least as many units as projected for that site in the 2021-2029 Housing Element. Projects located on Housing Element Sites identified to accommodate any portion of the City's Regional Housing Needs Allocation (RHNA) for lower income households must also result in at least as many lower income units assigned to the parcel.

The following paragraphs detail where unit projections and any lower income requirements can be found for each Housing Element site category.

Inventory of Adequate Sites (Appendix 4.1 of the 2021-2029 Housing Element)

The full list of sites in Appendix 4.1 can be found on the LACP website (<https://planning.lacity.gov/plans-policies/housing-element>). However, these sites are also noted in ZIMAS (<https://zimas.lacity.org>) by Zoning Information File 2512 (ZI-2512: Housing Element Sites) in the "Planning and Zoning" tab. The unit projection for the subject parcel can be found in the ZIMAS "Housing" tab next to "SB 166 Units". If the projected units are listed as a fractional number, then the minimum number of units for that site would be rounded up to the next whole number. For example, if a site's projected unit total is .45, then the development would need to result in at least one unit. If a housing element site is projected to host more than the number of proposed units (including ADU/JADUs), that parcel is ineligible for SHRA streamlining.

Private and Public Development Pipeline Projects (Appendix 4.3 and 4.2 of the 2021-2029 Housing Element)

The full list of sites in Appendices 4.2 & 4.3 can also be found on the LACP web page linked above. These sites are also noted in ZIMAS by ZI-2512 and have corresponding unit projects in the "Housing" tab. To be listed in Appendix 4.3 a site must have a proposed housing development project with City Planning entitlements or building permit applications that are already approved or under review. If a housing development project on this list were revised and re-submitted pursuant to SB 684, the project would need to result in at least the number of units listed in the "Total Capacity" column for that parcel. The same rules apply to any eligible Public Development Pipeline Projects listed in Appendix 4.2. As with Appendix 4.1, any housing element site that is projected to host more than the number of proposed units (including ADU/JADUs) is ineligible for SHRA streamlining.

Additionally, if a parcel in Appendices 4.1, 4.2, or 4.3 was identified to accommodate any portion of the City's RHNA for lower income households, the development must result in at least as many lower income units assigned to the parcel. This information is noted in the ZIMAS "Housing" tab. If these unit allocations are listed as fractional numbers, then the minimum number of units would be rounded up to the next whole number. These units shall be subject to a recorded affordability restriction of 99 years pursuant to the Resident Protections Ordinance (Ord No. 188,481). RHNA allocations for "moderate" and "above moderate" income units are not subject to any affordability requirements and can be treated as market-rate units.

Q.10 Do the standards required as part of the Small Lot Subdivision (SLS) Ordinance apply if they are opted into as part of a SHRA Project?

- A. The SHRA requires that eligible housing development projects comply with all applicable objective zoning, subdivision, and design standards established by the city unless these standards are inconsistent with the legislation. Projects that opt into other city programs like the Small Lot Subdivision (SLS) Ordinance or affordable housing incentive programs, are choosing to subject themselves to the eligibility and other requirements that apply to that program for the benefits they provide. SLS is not a requirement for SHRA project approval, and is located in the exception section of the LAMC (12.22 C.27).

Projects that are vested under the prior version of this memo are permitted to proceed under that policy (e.g. vested under the Housing Crisis Act, a vesting tentative tract map or having paid plan check fees with LADBS).

Q.11 Can the City disapprove a SHRA project?

- A. Yes. Pursuant to GCS 65852.28, the City "...may disapprove a housing development project that meets the requirements of this section if it makes a written finding, based upon a preponderance of the evidence, that the proposed housing development project would have a specific, adverse impact, as defined and determined in paragraph (2) of subdivision (d) of Section 65589.5, upon public health and safety and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact."

A "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete. The following shall not constitute a specific, adverse impact upon the public health or safety:

- Inconsistency with the zoning ordinance or general plan land use designation.
- The eligibility to claim a welfare exemption under subdivision (g) of Section 214 of the Revenue and Taxation Code.

Q.12 How does the SHRA work in the Coastal Zone?

- A. The SHRA applies in the Coastal Zone but does not supersede or in any way alter or lessen the effect or application of the California Coastal Act (Section 30000 of the Public Resources Code) or the current Coastal Development Permit procedures outlined in LAMC Section 13B.9.1 of Chapter 1A. Public Hearings will continue to be required. Applicants will be required to file for a Coastal Development Permit for any project that meets the “Development” definition (LAMC Section 13B.9.1. (Coastal Development Permit (Pre-Certification)) of Chapter 1A), including but not limited to the demolition, conversion, or new construction of dwelling units as well as subdivisions of land. A Coastal Development Permit should be filed with the application for the parcel or tract map.

Q.13 How is “net habitable square feet” calculated?

- A. SB 1123 clarified this means the finished and heated floor area fully enclosed by the inside surface of walls, windows, doors, and partitions, and having a headroom of at least six and one-half feet, including working, living, eating, cooking, sleeping, stair, hall, service, and storage areas, but excluding garages, carports, parking spaces, cellars, half-stories, and unfinished attics and basements. ADUs and JADUs are not counted in the average total floorspace calculation.

Q.14 How are demolitions and alterations defined?

- A. A demolition is the tearing down, razing or removal of a building or structure that requires a demolition permit. Physical alterations include any construction or renovation to an existing structure other than a repair or addition. Additions that also involve changes to the existing physical structure of the unit are considered an alteration.

Q.15 How is car share defined for the purposes of parking waivers?

- A. Car share means a vehicle rental program designed for people to rent vehicles for short periods of time, such as a few hours, pay only for their usage, and access the car at any hour, not just during business hours. The vehicles may be commercially or personally owned. Commercial car share companies generally offer a fleet of vehicles which may be picked up and returned to a designated parking spot, or are picked up and returned to non-designated parking spots. Personal vehicle sharing (peer-to-peer car sharing) allows private car owners to make their vehicles available for rental. Some car share companies operating in Los Angeles include, but are not limited to: BlueLA, Zipcar, Ryde, Waive, Getaround, Transfr, PiTcarz, Maeve, Turo, Envoy, and Animo. For the purposes of determining the applicability of this parking exemption, pick-up and drop-off locations are provided by the applicant and verified online.

Q.16 How will the City determine whether habitat for protected species exists on a parcel in order to determine compliance with GCS 66499.1 (a)(9)(I)?

- A. Properties located in Hillside Areas or the Coastal Zone have been assessed based on the potential presence of biological resources to assist in pre-screening parcels that may need further analysis to determine if habitat exists. Parcels flagged for further review in the SHRA Eligibility

Checklist in ZIMAS (under the Planning and Zoning tab) will require a completed Biologist's Statement of No Habitat (CP-3610) form to verify eligibility. However, SHRA applications on sites that are not flagged for further review will still require a completed Owner's Declaration of No Habitat (CP-3608) form. In either instance, all building permits for SHRA projects will require a City Planning Clearance to demonstrate compliance with this provision.

Q.17 Can existing Parcel or Tract Map applications utilize the SHRA?

- A. Yes, as long as all relevant SHRA project and site eligibility criteria are met. Applicants with eligible projects can work with their assigned project planner and/or the Development Services Center to modify their existing application and take advantage of SHRA streamlining. A revised map fee will be required.

Q.18 Can a development proponent utilize the SHRA in conjunction with a discretionary entitlement such as an Adjustment or Variance? What about a Zone Change if a site is not located in an eligible zone?

- A. Yes, a development proponent can combine a SHRA application for a subdivision resulting in 10 or fewer parcels with a Zoning Adjustment, Variance or Zone Change application. However, SHRAs ministerial processing requirements will no longer apply. If the Zone Change application is approved, it would be effectuated before recordation of the final Parcel or Tract Map.

Q.19 Can the city require the formation of a homeowner's association?

- A. No, except as required by the Davis-Stirling Common Interest Development Act for a condominium project. That said, the City may still require a mechanism to ensure maintenance of common space within the subdivision, including, but not limited to, a community maintenance agreement.

Q.20 Are LADBS haul route approvals required?

- A. Yes, however they must be processed ministerially, meaning without CEQA, public hearing or application of non-objective standards.

Q.21 May the City apply a Conditional Use Permit (CUP) for a SHRA project?

- A. No, per the HCD technical assistance letter to Oakland, a CUP shall not be required for a parcel map or a tentative and final map for a housing development project qualifying under GCS 65852.28 and 66499.41. Rather, eligible projects are considered ministerial and shall not require a discretionary permit or hearing.

Q.22 Can the SHRA be used to create condominiums? What about condo conversions?

- A. Condominiums and other for-sale multifamily projects are allowed, but only in zones where multifamily dwellings are permitted. SB 1123 also added language prohibiting any existing units from being alienable (sold) separate from the title to any other existing dwelling unit on the lot. This prevents an existing apartment building with a Certificate of Occupancy from being converted

using the law. Newly constructed buildings that have not yet received their Certificate of Occupancy may be permitted through a streamlined SHRA procedure, provided all applicable requirements are met.

Q.23 AB 130 (2025) included a provision allowing SHRA projects to include one remainder parcel. How is this defined and how could this be utilized? Do minimum lot size or other local development standards apply?

- A. Remainder parcels are defined in the Subdivision Map Act (GCS 66424.6). AB 130 allows SHRA projects to utilize a remainder parcel that retains existing land uses and does not contain any new residential units. It must also not be exclusively dedicated to serving the housing development. This new allowance was intended to facilitate SHRA projects on lots with existing uses. For example, a property owner could designate an existing commercial structure, apartment building, or single-family home as a remainder parcel and pursue a SHRA project elsewhere on the lot.

However, remainder parcels do not count towards the SHRA's 10 parcel limitation or the law's minimum density requirements for non-housing element sites. Local agencies cannot impose any minimum lot size, yard setback, or residential density standards on a designated remainder parcel. However, all applicable local zoning and development standards would be applied to any subsequent development project on a remainder parcel.

Q.24 Should a SHRA project's density be rounded up (or down) if the calculation yields a fractional number?

- A. This answer depends on which density standard is being calculated. We've provided a breakdown of the SHRA's density standards below detailing when one should round up (or down) to the nearest whole number along with the page number(s) where each standard is described in the memo.
- **SHRA Minimum Density - Housing Element Sites: Round Up**
 - SHRA projects located on housing element sites must result in *at least* the number of units projected for the site. See p.2-3 and Q.9 above for more information.
 - **SHRA Minimum Density - Non-Housing Element Sites: Round Down**
 - SHRA projects located on non-housing element sites must be built to 66% of: 1) the maximum local zoning density or 2) 30 units per acre, whichever is greater. Both density calculations would be rounded down to the next whole number, consistent with the LAMCs density calculations.
 - **Pre-Subdivision Allowable Density: Round Down**
 - This standard determines the number of allowable lots and/or primary dwelling units as a factor of the SHRA's minimum lot size requirements for multifamily zones (600 sf) or vacant single-family zoned sites (1,200 sf). Fractional numbers are rounded down to the nearest whole number because each new lot *must* be at least 600 or 1,200 square feet. See p.5 for more information.

- **Post-Subdivision Allowable Density: Round Up** (if less than 1), **Round Down** (all other instances)
 - LAMC density limits from the underlying zone are applied to each new SHRA parcel. *However, at least one primary dwelling unit must be allowed on each newly created parcel.* As such, post-subdivision allowable density calculations are rounded up if the calculation is less than one but are rounded down in all other instances. See p.5 for more information.
- **Protected Density: Round Down**
 - The SHRA prohibits local agencies from imposing certain standards that would physically preclude a project built to (or below) the site's protected density, which is the greater of 30 units per acre or the maximum zoning density. See p.7 for more information.

Q.25 Can SHRA applications be limited to the subdivision of land? If so, how would subsequent applications for the housing development be reviewed?

- A. Yes - a SHRA application can be limited to the subdivision of land for a future housing development. Prior to AB 130, GCS 66499.41(e) allowed local agencies to require concurrent approval of the subdivision and housing development by conditioning the approval and recordation of a SHRA subdivision upon the completion of all proposed dwellings. While the revised language in GCS 66499.41(e) generally prohibits the sale, lease, or financing of any new unimproved parcels separately from the other parcels (see p.12 for more information), it does not prohibit the sale of an entire unimproved subdivision. This revision, in conjunction with the ability to designate a remainder parcel, was intended to allow the subdivision and housing development to be conducted by different parties.

Additionally, the parcel or tract map *must* include at least the number of parcels needed to meet the site's applicable minimum density requirement and *must* be recorded before submitting an application for the housing development. Building permits for the subsequent housing development would be reviewed ministerially pursuant the provisions of GCS 65852.28.

Q.26 Can the SHRA be utilized on adjacent parcels at the same time? Does it matter if the projects are proposed by the same property owner?

- A. Yes - the SHRA can be utilized on adjacent parcels at the same time by the same (or different) developers. However, a unique LACP application would be required for each distinct parcel proposed to be subdivided. Each application is also limited to up to 10 new lots and/or primary dwelling units (not including ADU/JADUs). Finally, the perimeter of the *entire* site where SHRA projects are proposed must be "substantially surrounded" by "qualified urban uses" as defined in GCS 66499.41(a)(2)(B).

In this scenario, development proponents may submit SHRA applications concurrently or sequentially. Regardless, early coordination with LACP is *strongly* encouraged before any application(s) are submitted.