



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

July 1, 2013

Via E-Mail

Larry Webb

Chief Executive Officer

The New Home Company LLC

95 Enterprise, Suite 325

Aliso Viejo, California 92656

**Re: The New Home Company LLC  
Amendment No. 1 to Registration Statement on Form S-1  
Filed June 26, 2013  
File No. 333-189366**

Dear Mr. Webb:

We have reviewed your amendment and your letter dated June 26, 2013, and we have the following comment.

Management's Discussion and Analysis of Financial Condition and Results of Operations, page 61

Three Months Ended March 31, 2013 compared to Three Months Ended March 31, 2012, page 64

1. We note the disclosures you provided in response to comment 1 in our letter dated June 21, 2013. Please expand these disclosures to explain the factors that resulted in cost of home sales as a percentage of home sales to decline. If there are multiple factors that contributed to the decline, please quantify the extent to which each factor contributed to the decline. Please refer to Item 303(a) of Regulation S-K and Section 501.12 of the Financial Reporting Codification for guidance.

Larry Webb  
The New Home Company LLC  
July 1, 2013  
Page 2

You may contact Tracey Smith, Staff Accountant, at 202-551-3736 or Alfred Pavot, Staff Accountant, at 202-551-3738 if you have questions regarding comments on the financial statements and related matters. Please contact Asia Timmons-Pierce, Staff Attorney, at 202-551-3754 or me at 202-551-3397 with any other questions.

Sincerely,

/s/ Jay Ingram

Jay Ingram  
Legal Branch Chief

cc: J. Gerard Cummins, Via E-mail