

Communication from Public

Name: Hollywoodland Homeowners Association

Date Submitted: 10/05/2026 09:34 AM

Council File No: 09-0969-S4

Comments for Public Posting: Dear Los Angeles City Councilmembers and City Officials: The Hollywoodland Homeowners Association strongly opposes the proposed increase in non-applicant appeal fees under Council File 09-0969-S4 and urges you to reject Option B23. Public participation in land use decisions should not depend on the ability to pay a four-figure fee. Under the proposal, a neighbor or community member who is not the applicant would pay \$1,145 to appeal a discretionary land use decision within the noticing radius, or \$2,289 outside it. These fees would price ordinary Angelenos out of a process intended to give affected residents a meaningful voice. Tying appeal fees to notice eligibility compounds the problem. Residents outside a noticing radius can still experience a project's traffic, environmental, safety, and neighborhood impacts. Their concerns should not cost twice as much to present. Please consider the following: 1. These fees create an unacceptable financial barrier. Existing appeal fees already burden working people. Increasing them sharply would exclude residents who cannot afford to challenge decisions affecting their homes and neighborhoods. It would not improve the quality of those decisions. A public process accessible only to the wealthy is not meaningfully accessible. 2. Non-applicant appeals protect community participation. Developers and applicants often have attorneys, consultants, and staff to navigate City processes. Non-applicant appellants include renters, small homeowners, and community organizations. Pricing them out further tilts the process toward those with the greatest resources and tells constituents that their concerns are secondary. 3. Cost recovery must not override civic participation. Hearing appeals is a basic function of local government and a legitimate public expense. The City should consider General Fund support or surcharges on applicant fees rather than place the financial burden on residents seeking review of potentially harmful decisions. 4. Spread costs across the development activity that creates the need for appeals. The City already uses a General Plan surcharge on permits. A comparable approach could distribute some or all appeal-processing costs across development activity, rather than concentrating those costs on the relatively few residents who file appeals. If full cost recovery is required, it should be addressed across the system that generates the need for review. 5. Higher

fees would deepen inequities. Lower-income residents and communities of color often face substantial development impacts while having fewer resources to challenge them. Increasing the price of participation undermines the City's stated commitments to healthy, affordable, and equitable communities. Those commitments must be reflected in access to decision-making, not merely in policy language. The Hollywoodland Homeowners Association respectfully requests that the City Council:

- Reject the proposed fee increase under Option B23 and maintain the current non-applicant appeal fee.
- Direct staff to develop a surcharge mechanism, potentially through the existing General Plan surcharge framework, that spreads appropriate appeal-processing costs across development activity.
- Preserve meaningful access to appeals for affected residents, regardless of income or location within a noticing radius.

Los Angeles needs a land use process that is open, fair, and accountable. Residents should not have to purchase a costly seat at the table to raise legitimate concerns about decisions affecting their communities. Thank you for your consideration. Sincerely, Linda Doe Secretary Hollywoodland Homeowners Association, Inc.

Communication from Public

Name: Beth Dymond

Date Submitted: 10/05/2026 09:41 AM

Council File No: 09-0969-S4

Comments for Public Posting: I oppose the increase in non-applicant appeal fees; I object to the City Council silencing community members' voices. This motion will have especially harsh consequences for community members who simply cannot afford to pay such exorbitant appeal fees to have their voices heard.

Communication from Public

Name: Christine Mills O'Brien

Date Submitted: 10/05/2026 10:03 AM

Council File No: 09-0969-S4

Comments for Public Posting: Council File: 09-0969-S4 Subject: OPPOSE Non-Applicant Appeal Fee Increase — Council File 09-0969-S4 Dear Los Angeles City Councilmembers and City Officials: " The jaws of power are always open to devour, and her arm is always stretched out, if possible, to destroy the freedom of thinking, speaking, and writing." (John Adams, second United States President) Your proposal to increase appeal fees is similar to the one minute time limit to speak in public forum (both actions to silence). I object to the proposed increase in non-applicant appeal fees under Council File 09-0969-S4, and I urge the Committee to reject Option B23 as recommended by the Planning and Land Use Management Committee. Below are reasons to reject PLUM's proposal.

1. These fees are already a serious barrier for working people. Raising them by 10 times the current rate does not make the process more efficient — it simply excludes anyone who cannot absorb a four-figure fee to be heard. Also, there is no rational relationship to charge different fees based upon who was legally entitled to notice and who was not. A right that only the wealthy can afford to exercise is not meaningfully a right at all.
2. Appeals by "aggrieved persons other than the applicant" exist precisely to give affected communities a voice. Developers and applicants already have resources, attorneys, and staff dedicated to navigating city processes. Non-applicant appellants are ordinary residents — renters, small homeowners, and community organizations — pushing back on decisions that affect their daily lives. Pricing them out tilts the entire system toward developers and against the public. A tone-deaf act like this sends a poisonous message to your own constituents that you do not care about their welfare and only about ramming harmful projects through the City's approval process.
3. Cost recovery should not come at the expense of civic participation. The City has other tools to fund its planning and appeals processes — through general revenue or a surcharge on applicant fees — that do not require closing the door on public participation. Hearing and deciding constitutional land use appeal hearings is a fundamental function of your job and the local government. It is a legitimate expense of the General Fund.
4. If costs are truly motivating a desire to recover the cost of the planning department, levy a surcharge on the cause of the need for our communities to appeal

land use decisions: the developers whose projects impact communities. You currently surcharge applicant-developers on all permits to pay for the General Plan. If you want to recover more money so it does not come out of the General Fund to pay for processing the few appeals the City's Planning Commissions and City Council hear each year, levy a surcharge across all development activity as a legitimate cost of having real estate development in the City. If you must have full cost recovery instead of any General Fund subsidy, spread that cost across the entire system that generates the necessity of having a constitutional hearing system of Area Planning Commissions and City Council hearings. 5. This disproportionately harms lower-income communities and communities of color, who are statistically less likely to have the discretionary income to pay these fees, even as they are often the communities most affected by land use decisions such as upzoning, spot zoning, and large-scale development. On this point, the CAO's cruel proposal is inconsistent with your own adopted General Plan goals, policies and programs intended to make the City a healthy, affordable, and equitable place to live. Putting a commitment for an equitable Los Angeles in the Health Element is just words. This decision is an act that puts those words to action -- or defeats them. I respectfully request that the Committee:

- Reject the proposed fee increase under Option B23, and maintain the current appeal fee which is already a significant barrier for most people in Los Angeles;
- Direct staff to develop a surcharge fee, as part of the current General Plan surcharge, to recover a portion or all of the General Fund costs of land use appeals by spreading the cost recovery across all development activity of the City. There is a strong nexus between development activity and the need of the City to provide an outlet to improve projects to achieve the goal of healthy and safe communities.

Thank you for your time and consideration. I care deeply about keeping Los Angeles's land use process open, fair, and accessible to all residents — not just those in the wealthy class who can afford to pay for a seat at the table.

Sincerely, Christine Mills O'Brien Citizen of CD4

Communication from Public

Name: Sunshine Hill Residents Association

Date Submitted: 10/05/2026 10:10 AM

Council File No: 09-0969-S4

Comments for Public Posting: Dear Members of the Budget and Finance Committee: I strongly urge you to reject Option B23 and the proposed increase in non-applicant appeal fees. For those of us living in Los Angeles's Very High Fire Hazard Severity Zones, making it more expensive for residents to appeal land-use decisions is not simply an issue of public participation. It is a public-safety issue. This year alone, appeals were granted for four proposed development projects because they were not complying with standard fire-safety requirements. These were not frivolous appeals. They involved requirements intended to protect people living in some of the most fire-prone neighborhoods in Los Angeles. Yet under this proposal, when the City approves a project despite legitimate questions about fire access, evacuation, structural setbacks, defensible space or other fire-safety requirements, the residents who may bear the consequences could have to pay \$1,145 or \$2,289 simply to challenge that decision. Think about what that means. The developer has attorneys, consultants and professional teams navigating the City's approval process. But when a neighborhood discovers that an approved project may endanger their homes, street or community, the City proposes charging that resident more than \$2,000 for the opportunity to challenge its decision. Public safety should not depend on who can afford to appeal. Non-applicant appeals exist because City decision-makers sometimes get things wrong. Four successful fire-safety appeals in less than a single year demonstrate exactly why this safeguard matters. Los Angeles should be making it easier for residents to identify unsafe development and hold the City accountable — particularly in our fire-prone communities — not creating a financial barrier that could prevent legitimate safety concerns from ever being heard. It should not cost \$2,289 to tell City Hall that a project may be unsafe. Please reject Option B23 and maintain the existing non-applicant appeal fee. Sincerely, Diana Nicole MS President Sunshine Hill Residents Association



12400 Ventura Blvd #601, Studio City CA 91604
sunshinehillresidents.org

October 5, 2026

Council File 09-0969-S4 — Oppose Increase in Non-Applicant Appeal Fees

Dear Members of the Budget and Finance Committee:

I strongly urge you to reject Option B23 and the proposed increase in non-applicant appeal fees.

For those of us living in Los Angeles's Very High Fire Hazard Severity Zones, making it more expensive for residents to appeal land-use decisions is not simply an issue of public participation. **It is a public-safety issue.**

This year alone, **appeals were granted for four proposed development projects because they were not complying with standard fire-safety requirements.**

These were not frivolous appeals. They involved requirements intended to protect people living in some of the most fire-prone neighborhoods in Los Angeles.

Yet under this proposal, when the City approves a project despite legitimate questions about fire access, evacuation, structural setbacks, defensible space or other fire-safety requirements, the residents who may bear the consequences could have to pay **\$1,145 or \$2,289 simply to challenge that decision.**

Think about what that means.

The developer has attorneys, consultants and professional teams navigating the City's approval process. But when a neighborhood discovers that an approved project may endanger their homes, street or community, the City proposes charging that resident more than \$2,000 for the opportunity to challenge its decision.

Public safety should not depend on who can afford to appeal.

Non-applicant appeals exist because City decision-makers sometimes get things wrong. Four successful fire-safety appeals in less than a single year demonstrate exactly why this safeguard matters.

Los Angeles should be making it easier for residents to identify unsafe development and hold the City accountable — particularly in our fire-prone communities — not creating a financial barrier that could prevent legitimate safety concerns from ever being heard.

It should not cost \$2,289 to tell City Hall that a project may be unsafe.

Please reject Option B23 and maintain the existing non-applicant appeal fee.

Sincerely,

Diana Nicole MS
President
Sunshine Hill Residents Association

Communication from Public

Name: Clara Solis

Date Submitted: 10/05/2026 12:27 PM

Council File No: 09-0969-S4

Comments for Public Posting: Please oppose this increase which would mean residents would not be able to afford to file appeals. I am opposed to this increase to \$1,145 for someone within the City's noticing radius and \$2,289 for someone outside it. This is not a minor fee adjustment. It could effectively price residents and community organizations out of one of the few meaningful opportunities we have to challenge bad land-use decisions. For those of us living in Los Angeles's Very High Fire Hazard Severity Zones, this is especially shameful — and potentially dangerous. In our northeast communities our residents have filed appeals against projects that would endanger our communities. The appeal against the SKya project resulted in an additional affordable unit for lower income residents.

Communication from Public

Name: John Given

Date Submitted: 10/05/2026 12:51 PM

Council File No: 09-0969-S4

Comments for Public Posting: Honorable Council Members: Attached please find a letter strongly opposed to the proposal to increase non-applicant appeal fees by 5x (for those within notice/mailing radius) and 10x (for those outside the notice/mailing radius). The nominal general fund savings does not justify such a dramatic change in City policy, which strongly suggests the motivation for such a change is to create a substantial barrier to public participation in land use decisions in the City. I urge you to vote no or to at least delay consideration of the item until community members have had a fair opportunity to provide their input. Sincerely, John Given

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October 5, 2026

Submitted via comment portal at <https://cityclerk.lacity.org/publiccomment/>

Honorable Katy Yaroslavsky, Chair
Members of the Budget and Finance Committee
Los Angeles City Council
City Hall, Room 340
200 N. Spring Street
Los Angeles, CA 90012

RE: Oppose Proposed Administrative Appeal Fee Increase Without Additional Public
Review and Opportunity to be Heard
Council File 0-0969-S4, agenda item 13

Honorable Chair Yaroslavsky and Budget Committee Members:

Every few years the Los Angeles City Council considers raising, sometimes substantially, the amount of appeal fees to be charged for non-applicant appeals. These proposals have been universally met with boisterous opposition from neighborhood councils and public interest advocates whose community impact statements and letters have expressed strong opposition.¹

The current council file starts with a report from the Department of City Planning (DCP) in March 2023, with a recommendation to make an across-the-board increase of 4.9% to appeal fees of all types to reflect an annual inflation adjustment permitted in LA Municipal Code section 19.01.E (see Ordinance No. 187,237). This resulted in an increase to non-applicant appeal fees of \$8, moving the fee from \$158 to \$166. In 2024 the consumer price index increase was pegged at 3.5%, resulting in a corresponding increase of the non-applicant appeal fee from \$166 to \$172. That fee became effective on July 1, 2024. The CPI adjustment of an additional 3.4% raising the fee to \$178 became effective on July 1, 2025.² None of these CPI adjustments received any opposition from community members. This is in stark contrast to community input received for proposals that would change City policy to allow significantly greater cost recovery for non-applicant appeals (as occurred during 2021, see Council File 09-0969-S3).

¹ See the many submissions to Council File 09-0969-S3 at <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=09-0969-S3>.

² See Director of Planning Vincent P. Bertoni's May 28, 2025 memorandum on the annual CPI adjustment in Council File 09-0969-S4 at https://cityclerk.lacity.org/online/docs/2009/09-0969-s4_misc_1_5-28-25.pdf.

In short, Council File 09-0969-S4 had been used *exclusively* for CPI adjustments for more than two and a half years, from the time that council file was initiated until the October of 2025.

On October 7, 2025, DCP submitted a new report on a comprehensive fee update and recommended that non-applicant appeal fees be increased from \$178 to \$229, reflecting 1% of the calculated “full cost recovery.”³ Such an increase would have been substantial, while at the same time continuing the City’s longstanding policy of subsidizing non-applicant appeal fees to allow for full public participation in land use and planning decision-making, which for decades the City has at least implicitly determined benefits the public at large. The October 7, 2025 memo showed that the anticipated subsidy would be approximately \$3.35M. This subsidy represents a fraction of the City’s \$14.85B budget for fiscal year 2026-2027, just 0.022 percent.

The City’s PLUM committee heard this report and unanimously recommended the City Council adopt its recommendations.⁴ The Council adopted the PLUM report on October 28, 2025.⁵ Again, there was no opposition filed by community groups or public advocates. While the increase was substantial, the City *policy* for low, affordable non-applicant appeal fees was not being changed.

Only one week later, the City Administrative Officer submitted a report recommending appeal fees be raised. But attachment 1 to the report did *not* include any data with respect to non-applicant appeal fees.⁶

The CAO report recommending increased fees did not change the action of the City Council in considering Ordinance No. 188,796, which was adopted unanimously by the City Council on December 10, 2025.⁷ During discussion of the ordinance, however, the Council requested a report back from DCP regarding possibly decreasing the subsidy of the non-applicant appeal fee. DCP provided such a report on March 10, 2026, providing two options, one to increase all non-applicant appeal fees (to either 3, 4, 5, 10, or 20 percent of cost recovery rate) or one to differentiate between non-applicants who were within and without the notice/ mailing radius (though strangely suggesting the same 3, 4, 5, 10, or 20 percent of cost recovery).

The DCP report makes clear that even if the very highest recommended non-applicant appeal fee rate of 20% were charged for non-applicant appeals, *alleged* general fund savings⁸ would be nominal, reducing the General Fund Subsidy from \$3,354,420 to \$2,710,620. This is a savings of

³ See October 7, 2026, DCP Comprehensive Fee Update memo, attachment 1, p. 1, available at https://cityclerk.lacity.org/online/docs/2009/09-0969-S4_misc_2_10-07-2025.pdf.

⁴ October 14, 2025, PLUM report re 09-0969-S4, available at https://cityclerk.lacity.org/online/docs/2009/09-0969-S4_rpt_PLUM_10-14-25.pdf.

⁵ https://cityclerk.lacity.org/online/docs/2009/09-0969-S4_ca_10-30-25.pdf.

⁶ See Nov. 5, 2026, CAO memo, attachment 1, p. 1, available at https://cityclerk.lacity.org/online/docs/2009/09-0969-S4_rpt_cao_11-05-25.pdf.

⁷ See https://cityclerk.lacity.org/online/docs/2009/09-0969-S4_CAF_12-22-25.pdf.

⁸ On information and belief, the City has *never* provided a thorough study to determine how much time is *actually* spent on non-applicant appeals.

only \$643,800.⁹ If lower non-applicant appeal fee rates were adopted, the net savings would be greatly reduced. The general fund savings at 10% (a non-applicant appeal fee of \$2,289) would be \$321,900. At 5% (a fee of \$1,145) it would be only \$160,950.

The proposal now being considered saves a nominal amount of money relative to the general fund in the City (less than 0.002% of the City's adopted FY 2026-2027 budget). It is impossible to believe such a change could be motivated by anything other than a desire to dramatically decrease the number of appeals heard by the City. While there are certainly some wealthy communities within the City where such a dramatic increase can be borne, that is far from the case in most neighborhoods.

Boardmember and former Chairperson of the Santa Monica Mountains Conservancy, Irma Muñoz wrote of a previous proposal to increase non-applicant appeal fees: "It is hard to see the 'full-cost recovery' options currently recommended by the CAO as anything but a cynical attempt to deny public agencies and individual members of the public the opportunity to fully utilize their administrative options in opposing projects, and by extension, are an attempt to quash future litigation, regardless of the adverse impacts of a particular project."¹⁰ The Conservancy urged the City Council to "keep the cost of filing appeals at a rate that is affordable by ordinary citizens and other public agencies."¹¹

The Hollywood Homeowners Association noted during previous discussion of this issue that its members found "*mistakes that planning and building and safety have made in project approvals that needed correction through the appeal process.*"¹²

Many letters during the Council's 2017-2018 consideration of increased non-applicant appeal fees explained that even the low \$89 fee was beyond affordable for many city residents:

I am extremely concerned over the proposed action of increasing the Appeal Fee and urge the L.A. City Council to stay with the current fee of \$89 with an annual COL increase, which is already beyond the reach of many of the city's residents. [¶] Any jump in the fee will reduce the ability of citizens to petition the government. A proposal to jack up the fee to \$13,538 is a slap in the face of those who practice or believe in healthy civic questioning of our elected leaders — the very kind of questioning that has made the City Council a better, smarter and more fair entity (with more improvement still to come). [¶] Not only do residents make the City Council a better governmental body, but residents of LA are already covering these costs through their taxes

⁹ *Ibid.*, p. 3.

¹⁰ Irma Muñoz, Santa Monica Mountains Conservancy Chair, letter to City Council, Sept. 25, 2017, p. 1; available at: https://clkrep.lacity.org/online/docs/2009/09-0969_pc_09-25-2017.pdf.

¹¹ *Ibid.*

¹² Hollywood Homeowners Assoc., Aug. 14, 2017, letter to PLUM, available at https://cityclerk.lacity.org/online/docs/2009/09-0969_pc_08-14-2017.pdf.

to the city.¹³

Bel Air-Beverly Crest Neighborhood Council's CIS focused on the value of citizen and community organization appeals to the City process:

The BABCNC is strongly opposed to the proposed fee increase. The fundamental flaw in the City's logic is premised on the assumption that these appeals serve no benefit or value. On the contrary, these appeals often result in better projects. Developers often modify their projects to address community concerns and/or agree to new conditions of approval as a result of appeals. This is a net positive for the community even if there are additional costs borne by the City to process the appeal. The mere fact that the City does not receive a financial benefit does not mean that the City and community does not ultimately benefit... Further, in many situations, errors explained in appeal justification letters often result in corrections. Certainly, compliance with the law is a good thing for the community and the City. Other times, appeals are granted in their entirety when particularly egregious mistakes are made... Increasing the appeal fees creates a giant barrier to entry and this is not beneficial to either the community or the City.¹⁴

The lack of such comments in support of maintaining affordable non-applicant appeal fees in the current record indicates not that the public has had a universal change in heart about the City's rationale in setting non-applicant appeal fees. To the contrary, it strongly suggests that the public has not been closely following Council File 09-0969-S4 because that file had only ever been used for non-controversial CPI adjustments, not to entirely change City policy, and particularly not when the positive impact on the City's budget is miniscule, less than a rounding error.

I urge the Budget and Finance Committee to consider the above and the few comments likely to trickle in before your consideration of the matter, and if you are determined to move forward with such a dramatic shift in public policy first provide a more public-facing process to allow time (at least 60 days) for the City's many neighborhood councils and other public advocates to weigh in before the City Council considers adoption the current proposal.

I request that the entire record in all related council files (09-0969, 09-0969-S1, 09-0969-S2, and 09-0969-S3) be considered part of the record for this action, and I adopt by reference all arguments contained therein as well as those to follow in this council file that oppose the change to City policy as if fully set forth herein.

¹³ See Robyn McNutt, Bernie Eisenberg, "Sandy," et al., emails to Los Angeles City Council, Feb. 14, 2018, available at: https://clkrep.lacity.org/online/docs/2009/09-0969_pc_02-14-2018.pdf.

¹⁴ Bel Air-Beverly Crest Neighborhood Council, Community Impact Statement re Council File 09-0969, Dec. 26, 2017, available at: https://clkrep.lacity.org/online/docs/2009/09-0969_cis_12-26-17.pdf.

Thank you for your consideration of these comments.

Sincerely,



John Given

CC (by email only):

Councilmember Eunisses Hernandez: councilmember.hernandez@lacity.org

Councilmember Adrin Nazarian: councilmember.nazarian@lacity.org

Councilmember Bob Blumenfield: councilmember.blumenfield@lacity.org

Councilmember Nithya Raman: councilmember.raman@lacity.org

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Councilmember Ysabel Jurado: councilmember.jurado@lacity.org

Councilmember Tim McOsker: councilmember.mcosker@lacity.org

Communication from Public

Name: John Vangelisti

Date Submitted: 10/05/2026 02:35 PM

Council File No: 09-0969-S4

Comments for Public Posting: Please oppose Option B23 in Council File 09-0969-S4 and maintain the existing non-applicant appeal fee. Proposed fees of \$1,145 for someone within the City's noticing radius and \$2,289 for someone outside it would prevent many residents and community organizations from challenging land-use decisions. The community's appeal of the SKYA project shows why this process matters. It helped secure one additional affordable unit, reduce the project from 155 bedrooms to 101, and improve its design. That appeal might not have been possible at the proposed fee levels. Fire safety offers another urgent example. This year, attorney Jamie Hall and community advocate Clara Solis successfully challenged four proposed projects that did not comply with standard fire-safety requirements. Residents must be able to raise concerns about fire access, evacuation, setbacks, and defensible space, particularly in Very High Fire Hazard Severity Zones. The Onteora Hillside appeal and the efforts to Save Poppy Peak and Save Paradise Hill show how strongly residents value open land. In a climate crisis, communities need an affordable way to seek review of decisions affecting hillsides, trees, habitat, stormwater absorption, and wildfire safety. A four-figure appeal fee would make it harder for underserved neighbors to bring those concerns before City decision-makers. The proposed fees also raise a serious equity concern. Residents of underserved communities are often directly affected by land-use decisions, yet may have the fewest resources to hire counsel or pay a four-figure fee. Community organizations help neighbors participate and represent shared concerns. Pricing them out would diminish those communities' access to City government and their agency in shaping a safer, healthier future. Appeals have made our communities more livable and safer. Please ask the Budget and Finance Committee to reject Option B23 and keep non-applicant appeals affordable for all Angelenos. Please continue to be the People's Champion and Protect Mother Earth and the Rainbow of Creation. In Solidarity John Vangelisti

Communication from Public

Name: Don Andres

Date Submitted: 10/05/2026 03:03 PM

Council File No: 09-0969-S4

Comments for Public Posting: My name is Don Andres and I am the president of the Franklin/Hollywood West residents Association and Chairman of the Hillside Federation. Our community STRONGLY OPPOSES the proposal to increase non-applicant appeal fees (Council File 09-0969-S4). These increased non-applicant appeal fees would be inequitable, damaging to civic participation, and a threat to our natural environment. This type of appeal fee charge exacerbates the prevalent feeling that the City no longer works for the average citizen. I'm not sure you can characterize this proposal as "pay to play." It's close. It is clear is that this type of fee is beyond the means of most citizens and even many civic groups. Increasing non-applicant appeal fees is a LA citizen barrier - it keeps grassroots activists from engaging on projects they feel may violate the law or threaten the public welfare, while doing nothing to disturb the rights or participation of well-financed parties that may be proposing projects that skirt or abuse the law, or at least deserve to be honestly questioned. To summarize: the proposal to increase non-applicant appeal fees is bad public policy. We respectfully urge the Committee to REJECT the proposed fee increase under Option B23, and maintain the current non-applicant appeal fee levels.

Communication from Public

Name: Encino Property Owners Association

Date Submitted: 10/05/2026 03:20 PM

Council File No: 09-0969-S4

Comments for Public Posting: The City must safeguard the rights of all stakeholders, especially local residents impacted by land use decisions, to participate the land use process which includes the right to file appeals. We strongly oppose any increases in Appeal Filing Fees for impacted residents and community organizations. The constitutional due process rights of appeals must take precedent over the costs of City staff to process and hear such appeals.

Communication from Public

Name: Thelma Waxman

Date Submitted: 10/05/2026 04:23 PM

Council File No: 09-0969-S4

Comments for Public Posting: I strongly oppose the proposed increase in non-applicant land use appeal fees under Council File 09-0969-S4 and urge the City Council to reject Option B23. Under this proposal, a resident appealing a discretionary land use decision would be required to pay \$1,145 if the property is within the noticing radius and \$2,289 if it is outside it. That is an extraordinary increase from the current fee and would put the right to appeal beyond the reach of many Angelenos. The City's land use process is supposed to provide residents with a meaningful opportunity to challenge decisions that affect their homes, neighborhoods and communities. A right that costs more than \$1,000—or more than \$2,000—to exercise is simply not accessible to most people. This proposal is particularly troubling because the City has reduced noticing requirements. Charging dramatically different appeal fees based on whether someone happens to fall within a limited noticing radius makes little sense. Residents outside that radius may be directly affected by traffic, density, environmental impacts, infrastructure demands or other consequences of a project. Applicants and developers generally have attorneys, consultants and other professionals to navigate the City's land use process. Residents and neighborhood organizations usually do not. Imposing four-figure appeal fees on the public further tips an already uneven playing field. I also reject the argument that "cost recovery" justifies these fees. Providing a fair process for reviewing and appealing discretionary government decisions is a basic function of local government. Public participation should not be treated as a service available only to those who can afford the City's full administrative cost. If the Council believes additional revenue is necessary to cover the cost of land use appeals, there is a far more equitable solution: spread that cost across development activity rather than imposing it on the relatively small number of residents who exercise their right to appeal. The City already uses applicant surcharges to fund planning functions. A modest surcharge distributed across development applications could similarly support the appeal system. The proposed fees would also have the greatest impact on residents and community organizations with the fewest financial resources. The City cannot claim that equity and meaningful community participation are priorities while simultaneously

putting a four-figure price tag on access to its land use appeal process. I urge the City Council to:

- REJECT Option B23 and maintain the existing non-applicant appeal fee.
- DIRECT staff to develop an alternative that spreads any necessary cost recovery across development activity rather than charging individual residents thousands of dollars to appeal a City decision.

Los Angeles residents should not have to pay \$1,145 or \$2,289 simply to ask their government to reconsider a land use decision affecting their community. Access to City government should not depend on the size of someone's bank account.

Communication from Public

Name: Richard Marquez

Date Submitted: 10/05/2026 08:27 PM

Council File No: 09-0969-S4

Comments for Public Posting: The City of Los Angeles should not establish land-use appeal fees at a level that effectively prevents ordinary residents from exercising their right to participate in governmental decision-making. An appeal right that exists only for those who can afford to pay hundreds or thousands of dollars is not a meaningful right for many Los Angeles residents. The ability to challenge a land-use decision should not depend upon a person's income or financial resources. Especially when dealing with high value investor groups / Developers This is particularly important because land-use decisions can directly affect residents' homes, property values, neighborhood character, traffic, parking, noise, density, environmental conditions, and quality of life. The City has recognized that non-applicant appeals are different from appeals filed by project applicants. The City's March 2026 report identifies the full administrative cost of a non-applicant appeal as approximately \$22,894, yet the City has historically charged non-applicant appellants only \$229, representing approximately one percent of the City's estimated cost. This demonstrates that the City already recognizes that the full administrative cost of processing an appeal should not simply be imposed upon an individual resident. The City should therefore be extremely cautious about increasing appeal fees on residents. The purpose of an appeal is not merely to provide a private service to the person filing it. Appeals are an important part of governmental accountability. They provide an additional opportunity to identify errors, overlooked information, corruption, procedural problems, and community impacts before a land-use decision becomes final. Residents already support the City's governmental operations through taxes and other public revenues. While reasonable administrative fees may be appropriate, the City should not transform the appeal process into a "pay-to-play" (be-heard) system. A fee becomes particularly troubling when it is large enough to discourage an ordinary resident from exercising an otherwise available governmental right. The City Council should therefore: Maintain a nominal and affordable appeal fee for non-applicant residents; Establish a clear income-based fee waiver or hardship waiver for residents who cannot reasonably afford the fee; Ensure that the fee forms a reasonable relationship to the purpose of the appeal process rather than simply shifting the

City's entire administrative cost onto the individual appellant; Distinguish between project applicants with a direct economic interest in a project and members of the public seeking to participate in the governmental review process; Direct the City Attorney to evaluate whether excessive appeal fees create due-process, equal-protection, or right-to-petition concerns; and Require the City to demonstrate that any proposed increase will not disproportionately prevent low- and moderate-income residents from participating in the City's land-use decision-making process. The fundamental principle is simple: A resident should not have to be wealthy to have a meaningful voice in a governmental decision that affects his or her community. Los Angeles should preserve an appeal process that is accessible, fair, and meaningful to all residents, not merely to those who can afford the price of admission.

Communication from Public

Name: Gemma Carrillo Marquez

Date Submitted: 10/05/2026 08:35 PM

Council File No: 09-0969-S4

Comments for Public Posting: Hello, This is about more than an appeal fee. It is about public trust, government accountability, and the growing perception that City Hall is becoming more accessible to those who can afford it than to the ordinary residents who live here. When the City places a substantial price on the ability of a resident to appeal a land-use decision, we have to ask ourselves: Who is this government supposed to serve? Los Angeles residents should not have to pay hundreds or thousands of dollars simply to have their concerns heard by their own government. And that becomes even more troubling in a city where public confidence in government has already been damaged by repeated scandals, allegations of corruption, conflicts of interest, and the perception that political and financial influence can carry more weight than the voice of an ordinary resident. I am not suggesting that every City employee or elected official is corrupt. I am saying that government has a responsibility to avoid policies that create the appearance that money buys access while ordinary residents are priced out. An expensive appeal process can create exactly that perception. A developer, corporation, or well-funded organization may be able to absorb a large appeal fee as a cost of doing business. A working-class resident, senior citizen, renter, homeowner, or neighborhood volunteer may not be able to. That creates two different levels of access to government. One for those who can afford it—and another for everyone else. That is not the kind of government Los Angeles should be building. The City itself has recognized that non-applicant appeals are different from appeals filed by project applicants. The City has historically charged a much lower fee for members of the public because it recognized that residents should not be expected to pay the full administrative cost of the City's review. So why should ordinary residents now face increasingly expensive barriers to exercising their right to participate? If the City wants the public to trust its land-use decisions, it needs to make the process more accessible, more transparent, and more accountable—not less. When residents believe that they cannot challenge a decision unless they have enough money to pay the fee, the result is predictable: people lose faith in the process. And when people lose faith in the process, they begin to believe that decisions are being made for those with money, influence, and connections rather than for the

communities affected by those decisions. That is exactly the perception that City government should be working to eliminate. I urge the Council to reject excessive appeal fees and establish an affordable, meaningful appeal process for ordinary residents, including a hardship or income-based waiver where appropriate. Government should not be pay-to-play. Government should not be pay-to-be-heard. And residents should never have to be wealthy, politically connected, or represented by a powerful interest group to have a meaningful voice at City Hall. If Los Angeles wants to restore public trust, start by making sure that every resident—not just those who can afford the price of admission—has a meaningful opportunity to be heard. Thank you.

Communication from Public

Name: RAYMOND KLEIN

Date Submitted: 10/05/2026 08:47 PM

Council File No: 09-0969-S4

Comments for Public Posting: NO JUSTIFICATION FOR EXORBITANT FEES. The fact that other jurisdictions charge high appeal fees is not a justification for doing the same. We are not in a competition to see who can impose the highest fees. Appeals are an essential public service that the City should provide to aggrieved taxpayers. Imposing exorbitant fees sets a dangerous precedent: the next proposal could be to charge adjacent homeowners for fixing a pothole or repairing a broken streetlight. NON-APPLICANT APPEALS HELP LEVEL THE PLAYING FIELD. Non-applicant appeals provide an important check on development applications that are not by-right and are often supported by paid attorneys, architects, and consultants. Without the ability to appeal, community members are placed at a significant disadvantage when challenging projects that may affect their neighborhoods. COURT FILING FEES DEMONSTRATE HOW EXCESSIVE FEES CAN DISCOURAGE LEGITIMATE APPEALS. Court filing fees provide a useful benchmark. The Superior Court filing fee for a civil complaint seeking more than \$35,000 is \$435, with lower fees for claims involving smaller amounts. The filing fee for a petition for writ of mandate in the California Court of Appeal is \$775. If the City imposes an appeal fee approaching or exceeding these amounts, it raises a serious concern that the purpose is not to recover administrative costs, but to discourage legitimate appeals. EXORBITANT FILING FEES DENY ACCESS TO JUSTICE. If appeals to the City, an Area Planning Commission, or the City Council become cost-prohibitive for non-applicants, meaningful public participation will be limited to those who can afford to pay. Excessive filing fees undermine fair access to the City's land-use appeal process and ultimately access to justice.

Communication from Public

Name: Frank Ormsby

Date Submitted: 10/05/2026 08:51 PM

Council File No: 09-0969-S4

Comments for Public Posting: We cannot talk about development (fees) in Los Angeles without talking about infrastructure and sustainability. Los Angeles continues to approve and encourage new development, increased density, and additional housing—and I support responsible housing and responsible growth. But development cannot exist in a vacuum. Every new building, every additional unit, and every increase in population places additional demands on infrastructure that is already under enormous strain. Our streets are deteriorating. Our sidewalks and pedestrian infrastructure need investment. Our storm-drain system is aging. Our electrical grid faces increasing demands. Our water infrastructure requires continued investment. Public transportation needs improvement. And many neighborhoods are already struggling with traffic, parking, flooding, and other infrastructure deficiencies. Don't get me started on Police and Fire! The question we need to ask is: Are we building sustainable communities, or are we simply adding more development to infrastructure that is already struggling to keep up? Sustainability is not simply putting solar panels on a building or planting a few trees. True sustainability means making sure that the infrastructure supporting a development is capable of handling it—not just today, but decades from now. When the City approves additional density without adequately addressing infrastructure capacity, the costs don't disappear. They are transferred to the residents. Residents experience increased traffic. They experience overcrowded streets and parking. They experience increased pressure on water and power systems. They experience storm-water problems. They experience deteriorating public infrastructure. And ultimately, taxpayers are asked to pay for improvements necessary to accommodate growth that was approved before the infrastructure was ready. That is not sustainable development. We need a more comprehensive approach. Before approving significant increases in density, the City should be asking: Do we have the roads to support this development? Do we have adequate storm-water infrastructure? Can our water system handle the additional demand? Is the electrical infrastructure adequate? Can our transit system realistically accommodate additional residents? Are our sidewalks, streets, and public spaces capable of supporting the increased population? And perhaps most importantly: Who is

going to pay to bring that infrastructure up to the level necessary to support the additional development? We cannot continue treating infrastructure as an afterthought. If the City is going to require residents and developers to comply with increasingly complicated planning and development requirements—and charge substantial fees for participating in that process—then the City also has a responsibility to demonstrate that the infrastructure supporting that development is being responsibly planned and maintained. There needs to be a connection between development capacity and infrastructure capacity. Growth should help create stronger communities, not simply place additional burdens on neighborhoods that are already struggling. I am asking the Council to support a development policy that recognizes a simple principle: Infrastructure should not chase development, cart before the horse! Infrastructure should be planned alongside development. Los Angeles needs housing. Los Angeles needs economic development. But we also need sustainable neighborhoods, functioning infrastructure, reliable public services, and a long-term plan for the communities we are building. If we build faster than we can maintain our infrastructure, we are not solving tomorrow's problems. We are creating them! Responsible development means looking beyond the ribbon-cutting ceremony and asking what that development will require from the City—and from the residents who will live with its consequences for the next 20, 30, or 50 years. Fees become hurdles or in many cases roadblocks for responsible development! Let's stop creating barriers for smart development, instead, create sustainable living conditions for all Angelino's.