UNITE HERE! LOCAL 11

October 30th, 2026

RE: OPPOSITION TO FEE INCREASE: Council File 09-0969-S4

Dear Los Angeles City Councilmembers,

On behalf of UNITE HERE Local 11, we write to formally object to the proposed increase in non-applicant appeal fees under Council File 09-0969-S4. I urge the City Council to reject Option B23, as recommended by the Planning and Land Use Management and Budget and Finance Committees.[1]

Under the proposal, a neighbor or community member aggrieved by a discretionary land use decision would be required to pay **$1,145** to appeal if located within the project's noticing radius, or **$2,289** if located outside it, compared with the current $229 fee.[2]

Recent amendments to noticing requirements of the City have already reduced the notice area to immediately adjacent landowners.[3]

I ask the Council to consider the following:

1. **These fees are already a serious barrier for working people.** Increasing appeal fees to five times the current amount for residents within the noticing radius, and nearly ten times the current amount for those outside it, would make the appeals process unaffordable for many working Angelenos. A resident's ability to challenge a potentially harmful land use decision should not depend on their ability to pay thousands of dollars. Nor should residents who may experience similar impacts face drastically different fees simply because they live on opposite sides of a noticing boundary.
2. **The proposed fee increase is not limited to appeals involving housing developments.** City and state laws already provide streamlined or ministerial approval pathways for qualifying housing developments, and certain administrative approvals are not subject to appeal. The proposed fee increase would also apply to appeals involving commercial developments, including projects that may raise significant concerns about neighborhood compatibility, traffic, environmental impacts, and quality of life. The Council should not make it prohibitively expensive for residents to seek review of these decisions.[4]
3. **Appeals by aggrieved persons other than the applicant are an important safeguard for affected communities.** Developers and other project applicants frequently have access to attorneys, consultants, and professional staff who can navigate the City's land use approval process. By contrast, non-applicant appellants can include renters, working-class homeowners, and neighborhood organizations that have limited resources. Appeals provide these community members with a meaningful opportunity to raise concerns about decisions that affect their neighborhoods and daily lives. The City should protect this opportunity rather than restrict it to those who can afford substantial filing fees.

4. **The City's own data show that non-applicant appeals have declined substantially, raising questions about the need for such a dramatic fee increase.** According to the City Administrative Officer, the City received 217 non-applicant appeals in fiscal year 2015–16 and 266 in fiscal year 2016–17. By fiscal year 2024–25, that number had fallen to just 148 — a decline of approximately 32 percent from 2015–16 and 44 percent from 2016–17.[5]

Furthermore, the City's own fiscal analysis estimates that Option B23 would reduce the annual General Fund subsidy for non-applicant appeals from approximately **$3.35 million to $3.10 million**, a reduction of only about $255,000, or 7.6 percent. These estimates assume the same number of appeals despite dramatically higher filing fees.[2]

The reduction in appeals does not necessarily mean that the cost of processing each appeal has declined. However, before increasing fees by five to ten times their current level, the Council should require a clear explanation of the actual staff time, workload, and costs associated with processing these appeals, particularly given the substantial decline in their number. The relatively modest projected savings should be weighed against the potential exclusion of working people from an essential public process.

Accordingly, I respectfully request that the City Council reject Option B23 and maintain the current $229 non-applicant appeal fee. The existing fee already presents a meaningful financial barrier for many Los Angeles residents. Increasing it so drastically would further undermine public participation and make an important avenue of government accountability inaccessible to those who need it most.

Regards,

Charlie Carnow
Research Analyst
UNITE HERE Local 11

SOURCES

1. Los Angeles City Council, PLUM and Budget and Finance Committees' Joint Report, CF 09-0969-S4 (Aug. 25 / Oct. 6, 2026). Council report
2. City Administrative Officer, Department of City Planning Non-Applicant Appeal Fee Options Fiscal Impact (Mar. 24, 2026), pp. 1–2 and Attachment B, B23. CAO report
3. LAMC ch. 1A, §13B.2.1(C), Class 1 CUP notice; Los Angeles City Planning, Conditional Use Permit — General, CP13-7772 (May 2026). Zoning code
4. Los Angeles City Planning, Land Use Determinations and Citywide Housing Incentive Program; LAMC ch. 1A, §§13B.3.1(G), 13B.3.2(G). Land use determinations · Housing program
5. CAO, Supplemental Information Regarding the City Planning Comprehensive Fee Study (Aug. 7, 2017), Attachment 4; CAO (Mar. 24, 2026), p. 1. Declines calculated from counts. 2017 CAO report