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November 9, 2026

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

Honorable Council President Marqueese Harris-Dawson
Honorable Members of the Los Angeles City Council
Los Angeles City Council
City Hall, Room 340
200 N. Spring Street
Los Angeles, CA 90012

RE: Oppose Proposed Administrative Appeal Fee Increase
Council File 0-0969-S4
Nov. 10, 2026 City Council Agenda, Item 35

Honorable Council President Harris-Dawson and Council members:

This letter follows on my letter of October 5, 2026 to the Council's Budget and Finance Committee.[1]

Since the time my earlier letter was submitted, there have been well over a hundred additional comment letters submitted to the file, from commenters and community groups located all over the City of Los Angeles, all of which are strongly opposed to the proposed action to dramatically increase non-applicant appeal fees minimally five-fold or ten-fold for appellants beyond the notice area for the underlying approval. Not one letter has been submitted in support.

A public comment submitted to the council file today by Mark Kenyon does an excellent job of summarizing some of the many reasons the City should not take this action.[2] I adopt Mr. Kenyon's letter and attachments as if set forth in full herein.

If Council is determined to move forward with an action to significantly reduce public participation in the City's land use decisions, it *must* do so based on accurate information. The basis for the action the City Council contemplates has been entirely upended by the approval by Los Angeles voters of City of Los Angeles Measure PL, which will entirely change the structure and process for land use appeals by creating one Neighborhood Appeals Commission for the entire City, to replace the existing seven Area Planning Commissions. Even if the City's

[1] A copy of that letter as well as introductory remarks submitted via the City Clerk comment portal are available beginning at p. 10 of the following pdf file: https://d22tgksh1zpp6f.cloudfront.net/OnlineDocs/2009/09-0969-S4_PC_PM_10-05-2026.pdf.
[2] See https://d22tgksh1zpp6f.cloudfront.net/OnlineDocs/public-comments/2026/attachments/09-0969-S4-2026-11-09-PC-2026-0410-1.pdf and https://d22tgksh1zpp6f.cloudfront.net/OnlineDocs/public-comments/2026/attachments/09-0969-S4-2026-11-09-PC-2026-0410-1.pdf.

previous rationale to justify the dramatic shift in public policy had been thoughtful and well-supported, and it was neither thoughtful nor well-supported, the City cannot take the action to increase fees for an appeal system that will soon cease to exist. As described to voters, one of the purposes of the new system is to dramatically reduce costs. But appellants will be expected to pay as if operating within the older, more expensive system, and will thus be overcharged if those fees are applied to a new system. This undercuts any rational basis the City might have previously had to determine non-applicant appeal fees and needlessly puts the City at significant risk of legal challenge to the change.

As discussed in my letter of October 5, it is evident from the entirety of the record, and especially from the complete lack of comments until community members realized what was happening (due to faulty notice at both the Council's Planning and Land Use Management and Budget and Finance Committees), when previous attempts to increase non-applicant appeal fees were met with universal and vehement opposition from neighborhood councils and other public commenters, that the proposal has not had a fair hearing. City leaders might consider whether there are lessons to be drawn from the recent election when considering taking such a dramatic step when their constituents feel they have not been heard or respected.

I urge the Council to withdraw the proposal entirely, at least until a revised estimate for appeals under the new appeal system can be determined and a fair opportunity for public participation from community members, public advocates, and neighborhood councils can be had.

Thank you for your consideration of these comments.

Sincerely,



John Given