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Bridging democracies: A case study of the Los Angeles Department of Neighborhood Empowerment

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Bridging democracies: A case study of the Los Angeles Department of Neighborhood Empowerment

DISSERTATION

submitted in partial satisfaction of the requirements
for the degree of

DOCTOR OF PHILOSOPHY

in Planning, Policy, & Design

by

Brian Hui

Dissertation Committee:

Professor David Feldman, Chair
Professor Maria Rendon
Professor Scott Bollens
Professor Sharoni Little, USC

2018
Dedication

To

Zara Sahar

Whose intelligence, determination, and good humor inspire me to help cultivate an engaged and inclusive society that is well-equipped to enjoy the benefits of her future contributions.
# Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>List of Figures</td>
<td>iv</td>
</tr>
<tr>
<td>List of Tables</td>
<td>v</td>
</tr>
<tr>
<td>Acknowledgements</td>
<td>vi</td>
</tr>
<tr>
<td>Curriculum Vitae</td>
<td>vii</td>
</tr>
<tr>
<td>Abstract of the Dissertation</td>
<td>viii</td>
</tr>
<tr>
<td>Chapter 1: Introduction</td>
<td>1</td>
</tr>
<tr>
<td>1. Research Questions</td>
<td>10</td>
</tr>
<tr>
<td>Chapter 2: Literature Review</td>
<td>14</td>
</tr>
<tr>
<td>Chapter 3: Methodology</td>
<td>29</td>
</tr>
<tr>
<td>Chapter 4: Findings: Historical Context of Charter Reform, Neighborhood Councils and ELA</td>
<td>56</td>
</tr>
<tr>
<td>Chapter 5: Findings: Policy Boundaries and Boundary Practices</td>
<td>79</td>
</tr>
<tr>
<td>Chapter 6: Findings: Organizational Boundaries and Boundary Practices</td>
<td>112</td>
</tr>
<tr>
<td>Chapter 7: Findings: Governance Role Boundaries and Boundary Practices</td>
<td>164</td>
</tr>
<tr>
<td>Chapter 8: Significance of Findings</td>
<td>205</td>
</tr>
<tr>
<td>Chapter 9: Conclusion</td>
<td>226</td>
</tr>
<tr>
<td>References</td>
<td>238</td>
</tr>
<tr>
<td>Appendix A: Interview Guide</td>
<td>245</td>
</tr>
<tr>
<td>Appendix B: Neighborhood Council Ordinances</td>
<td>249</td>
</tr>
<tr>
<td>Appendix C: Neighborhood Council Plan</td>
<td>273</td>
</tr>
</tbody>
</table>
# List of Figures

<table>
<thead>
<tr>
<th>Figure</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Figure 1</td>
<td>Neighborhood Council system map</td>
<td>5</td>
</tr>
<tr>
<td>Figure 2</td>
<td>Los Angeles City Hall</td>
<td>34</td>
</tr>
<tr>
<td>Figure 3</td>
<td>Van Nuys City Hall</td>
<td>34</td>
</tr>
<tr>
<td>Figure 4</td>
<td>ELA organizational chart</td>
<td>35</td>
</tr>
<tr>
<td>Figure 5</td>
<td>Governance entities traversing three boundaries</td>
<td>47</td>
</tr>
<tr>
<td>Figure 6</td>
<td>ELA policy boundaries, practice</td>
<td>80</td>
</tr>
<tr>
<td>Figure 7</td>
<td>Civic University</td>
<td>97</td>
</tr>
<tr>
<td>Figure 8</td>
<td>CIS submission map by Neighborhood Council, 2014-2016</td>
<td>107</td>
</tr>
<tr>
<td>Figure 9</td>
<td>ELA process boundaries, practices</td>
<td>113</td>
</tr>
<tr>
<td>Figure 10</td>
<td>Chart staff and NCs</td>
<td>151</td>
</tr>
<tr>
<td>Figure 11</td>
<td>ELA organization chart</td>
<td>156</td>
</tr>
<tr>
<td>Figure 12</td>
<td>ELA governance role boundaries, practices</td>
<td>165</td>
</tr>
<tr>
<td>Figure 13</td>
<td>2003/04 ELA budget</td>
<td>202</td>
</tr>
</tbody>
</table>
### List of Tables

<table>
<thead>
<tr>
<th>Table</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Table 1</td>
<td>Plan for a System of Citywide Neighborhood Councils, 2001</td>
<td>15</td>
</tr>
<tr>
<td>Table 2</td>
<td>Research rationale</td>
<td>31</td>
</tr>
<tr>
<td>Table 3</td>
<td>Research Question data typology</td>
<td>39</td>
</tr>
<tr>
<td>Table 4</td>
<td>Interview informant list</td>
<td>41</td>
</tr>
<tr>
<td>Table 5</td>
<td>Archival review of practices</td>
<td>46</td>
</tr>
<tr>
<td>Table 6</td>
<td>Mission, duties of ELA</td>
<td>70</td>
</tr>
<tr>
<td>Table 7</td>
<td>Neighborhood Council CIS submissions</td>
<td>106</td>
</tr>
<tr>
<td>Table 8</td>
<td>ELA performance metrics</td>
<td>203</td>
</tr>
<tr>
<td>Table 9</td>
<td>Overview of Contextualized Findings</td>
<td>206</td>
</tr>
</tbody>
</table>
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Curriculum Vitae

Brian Hui

EDUCATION

  • Research Focus: Civic Engagement, Participatory Democracy, Organizational Boundaries

RESEARCH EXPERIENCE

• Doctoral Research – Site: Los Angeles Department of Neighborhood Empowerment
• Faculty Fellow – Pat Brown Institute (2016-2017)
  • Los Angeles Youth Development Department Feasibility Analysis
  • Los Angeles Youth Development Commission Implementation Strategy
• Community Investigator
  • WINCART: Weaving an Islander Network for Cancer Awareness, Research, and Training (II) Tanjasiri & Palmer (PIs) 9/2/2010-9/1/2015. NIH/NCI (U54 CA153458)
  • Exploring the Intersection of HIV and HPV Among Pacific Islanders (EXIHHPI) Tanjasiri (PI) 5/1/09-9/31/2010. National Cancer Institute (1 U01 CA114591-05S2)
  • PATH: Promoting Access to Health for Pacific Islander and Southeast Asian Women Foo (PI) 9/30/07-9/29/2012. Centers for Disease Control and Prevention (1U58DP001006)

CONFERENCE PRESENTATIONS


PUBLICATIONS

Abstract of the Dissertation

Bridging democracies: A case study of the Los Angeles Department of Neighborhood Empowerment

By

Brian Hui

Doctor of Philosophy in Planning, Policy, & Design

University of California, Irvine, 2018

Professor David Feldman, Chair

In Los Angeles in the early 1990s, widespread dissatisfaction with differential access to city government and an array of systemic injustices, including inequitable city service distribution, neighborhood red-lining, and police brutality led to a crisis of confidence. The subsequent civil unrest and a secession movement, which threatened to fragment the city, ultimately led to reforms to the City’s governing charter. Although Los Angeles charter reform served as the arena in which numerous political battles were fought, some participants saw the crisis as a mandate to “strengthen” democracy by enhancing participatory and inclusive structures. These reformers created a system of neighborhood councils to promote civic engagement and improve government responsiveness to local concerns, and established the Department of Neighborhood Empowerment (ELA) to oversee the new system.

This dissertation research is a case study that examines how ELA bridges the different approaches to governance between the more grassroots-focused neighborhood councils and the City’s established bureaucratic structures. I use 45 in-depth interviews, 400 hours of observation, and archival review, to explore how ELA’s role and practices bridge the boundaries between neighborhood councils and city bureaucracy, how this has changed over time, and how they shape and are shaped by the principles of strong democracy. My findings suggest that ELA serves as a boundary structure in three
main arenas: public policy, organizational processes, and governance paradigms. These findings not only contextualize the outcomes of neighborhood council activities, but also illuminate the potential of neighborhood councils as a means of democratic reform in other large complex municipalities.
Introduction

[The Neighborhood Council’s] role... is to be the most vocal and the most annoying and the most... most socially disruptive members of the community, speaking on behalf of the people that they represent. (ELA staff member -16d)

The Neighborhood Councils’ ideas and drive for innovation can be infectious. (ELA staff member - 02d)

Introduction to Study

This dissertation explores the process of democratic reform in a large city seeking to create formal structures to expand participation in city governance. The overall goal of this study is to better understand how cities employ these boundary structures to bridge the attributes of traditional elected governments with neighborhood-based focused structures more oriented towards stakeholder participation. The significance of this research rests on the notion that during a time when municipal governance bodies are struggling to respond to the needs of their jurisdictions, reforming democratic structures to improve participation and government responsiveness is essential to maintaining the efficacy and legitimacy of municipal government. Although grassroots reform efforts push cities towards local governance and direct participation, how best to integrate democratic paradigms remains unclear. This case study examines and presents how one city department’s boundary practices play a pivotal role in enabling reform. Therefore, this case study is significant because it provides an original approach to understanding and connecting the theoretical and practical dimensions of the democratic reform process. The findings contribute to the body of knowledge in the fields of public policy, public management, and democracy studies.

This chapter discusses the background and current context of the case, and its focus on transforming the City of Los Angeles. This chapter also includes the problem statement, research
objectives and research questions, a general description of research approach, assumptions, as well as findings and contributions.

**Background and Context**

If Charter reform is a response to ineffective governance and civic disengagement, then the proliferation of Charter reform movements suggests that there is an epidemic of governance problems among cities in the United States. As cities in the United States have grown in size and diversity, traditional municipal governments have encountered increasingly complex challenges to effective administration. Benjamin Barber (1984) argues that yielding governance responsibilities to representatives distances government from local needs and ultimately encourages the manipulation of democratic values towards individualistic and private ends, or “thin democracy,” rather than community goals. Social and political alienation are the inevitable result. Furthermore, if authority is legitimized power, then the combination of ineffectiveness and disconnect has undermined the authority of many cities, and explains the crises in confidence and subsequent protests and calls for reform of the last three decades. In California alone, San Jose (1986), Fresno (1993), San Francisco (1996), Oakland (1998) and San Diego (2003) have all engaged in Charter reform to resolve crises (Mullin, Peele, & Cain, 2004). Furthermore, throughout the United States, large and medium sized cities, including Cincinnati, New Orleans, Dallas, Houston, New York, Detroit, and Philadelphia, have also pursued reform (Ingram, 2008).

In an attempt to resolve these crises of authority and estrangement from formal government, some cities are reforming their governance structures to incorporate more grassroots input into traditional electoral structures (Berry et al., 1993; Ingram, 2008). This approach is built on engaged civic attitudes and participatory institutions, which comprise the “strong democracy”
for which Barber advocates (Barber, 1984). The critical role of citizen participation in the health of democracy has been supported empirically. Increased grassroots participation enhances both the effective responsiveness of government and the sense of community in local neighborhoods (Berry et al., 1993; Putnam, 1995).

In a further effort to cultivate grassroots participation, some cities have established neighborhood councils. Parlow (2008) suggests that developing structures that distribute power, like neighborhood councils, can reduce citizen alienation and help local stakeholders to overcome high barriers to collective action and participation posed by a city-hall-centric public administration. Neighborhood councils, he argues, can provide viable avenues for creating change and thereby encourage citizens to participate in civic engagement activities on a sustained basis (Parlow, 2008). Although their specific definitions vary by jurisdiction, neighborhood councils, broadly defined, are city-sponsored local stakeholder groups designed to promote civic engagement and improve government responsiveness to local issues. By developing neighborhood council systems across an entire jurisdiction that collectively represent local citizens, ideally between 3,000 and 5,000 residents (Cooper & Musso, 1999), cities reorient their administrative processes from a centralized model that emanates outward to localized processes that extend upwards and back towards the center.

Neighborhood councils aim to achieve the goals of civic engagement and government responsiveness in two principal ways. First, by creating additional mechanisms for meaningful participation over time, citizens will feel less alienated (Musso et al., 2006; Arnstein, 1969; Krimsky, 1984). Second, neighborhood councils provide instrumental ways for cities to collect and use local knowledge, and allow for better understanding of local policy issues and better crafted
Interventions (Musso et al., 2007; Musso et al., 2011; Berry et al., 1993). Thus, neighborhood councils can strengthen both the legitimacy and efficacy of city governance.

Los Angeles Neighborhood Councils.

In Los Angeles in the early 1990s, a combination of widespread dissatisfaction with disparate access to City government and an array of systemic injustices, including inequitable City service distribution, neighborhood red-lining, and police brutality led to a crisis of confidence (Sonenshein, 2013). The subsequent civil unrest and a secession movement, which threatened to fragment the City, ultimately led to reforms to the City’s governing Charter. Although Los Angeles Charter reform served as the arena in which numerous political battles were fought, some Charter reformers saw the crisis as a mandate to “strengthen” democracy by enhancing participatory and inclusive structures. They created a system of Neighborhood Councils (NCs), which are city certified groups of local stakeholders that advise on issues of concern to the neighborhood and whose purpose is to promote civic engagement and improve government responsiveness to local issues (Los Angeles City Charter art. ix, sec. 900).

In the 17 years since the NC system was established, Los Angeles NCs have proliferated to the current 96 certified councils, which cover over 90% of Los Angeles neighborhoods. More than 1800 individuals currently serve on NC boards, and hold approximately 4000 public meetings per year. Each NC receives an annual budget of approximately $40,000 to carry out their agenda to serve their community. However, what these efforts look like varies as much as NCs vary in their composition, issues of interest, operating procedures, and roles in the community. Some NCs focus on conducting outreach and education, and hold neighborhood social events. Other NCs
focus heavily on advocating for or against City legislation, and commit their resources to community organizing. Other NCs engage in a mix of activities.

![Neighborhood Council system map (2012)](image)

As the system has matured, and NC boards and individual participants have grown in capability, the system has evolved. A system of regional alliances have sprung up for NCs to

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1 [www.empowerla.org/city-map/](http://www.empowerla.org/city-map/)
collectively organize around shared regional concerns. Topical alliances have similarly sprung up to address policy issues common across the City, such as planning and land use and emergency preparedness. In addition, the NC system’s relationship with the City has matured, resulting in deeper connections between NCs and City departments and elected officials. This development is punctuated by the election of former NC board members to City Council and citywide office. Although the debate about the proper role of the NCs in city government rages on, as does the debate over the degree to which NCs have fulfilled their purpose, the NC system has become firmly established in the City of Los Angeles.

Problem

Neighborhood Councils in Los Angeles were developed as a broad-based response by local neighborhoods to community disenfranchisement at the hands of the elected City government. The council system approach, it was thought, would decentralize governance and shift decision-making away from an unresponsive bureaucracy and towards active local communities. A neighborhood council system seeks to increase citizens’ access to meaningful participation in local government and improve City services provided to local communities through the mobilization of local knowledge. The Department of Neighborhood Empowerment, or EmpowerLA² (ELA), is the City department established during Charter reform to oversee the Neighborhood Council system and to support the system’s goals. Despite intentions to foster “strong democracy” in Los Angeles, the implementation of a Neighborhood Council system has encountered challenges.

² The Charter creates a Department of Neighborhood Empowerment. “DONE” has been adopted as a pejorative nickname for the department, meant to characterize ineffectiveness and other dysfunctional stereotypes, by both other city entities and among NCs. In an effort to undercut this perception, the department rebranded itself as “EmpowerLA,” which other city entities and NCs have resisted adopting. In this dissertation, I use the acronym “ELA” to avoid participating in this struggle over departmental identity.
The actors involved in the Los Angeles Neighborhood Council system — Neighborhood Council participants, departmental bureaucrats, elected officials, the Department of Neighborhood Empowerment (ELA) staff, and City residents — often have divergent expectations, mistrustful and antagonistic relationships, and disagreement on how best to achieve outcomes. Implementation challenges can be traced back to fundamental problems with the process of integrating the seemingly incompatible power structures of a traditional electoral system and a grassroots system. Electoral democracy, fundamentally, is built on representation and elite expertise (Bachrach, 1967). Grassroots democracy, in contrast, is built on direct participation and local knowledge (Abers, 2000; Fung & Wright, 2001). When citizens do not feel that they are well represented and have limited ability to meaningfully participate, a crisis in confidence in the system ensues.

Evaluations of the Neighborhood Council system (Musso et al., 2004; Musso et al., 2007) highlight the continued inconsistent responsiveness of the City bureaucracy to the Neighborhood Council input and suggest that City departments and City leaders minimize and disregard the non-expert perspectives of Neighborhood Councils. These evaluations further indicate that the capacity of Neighborhood Councils to meaningfully participate in policy discussions varies widely, preventing some councils from being able to understand, let alone discuss or disseminate, topical policy issues. Given that improving government responsiveness is one of the principal goals of the Neighborhood Council system, improving the translation of knowledge across the boundary between Neighborhood Councils and the City bureaucracy requires urgent attention. Focusing on NC system practices illustrates how democratic structures shape participation and also how an engaged citizenry help to define the structure for democratic participation.
Conceptual Framework

This study draws on two principle concepts to understand how ELA functions within the NC system and ELA’s role in city governance: boundary structures and strong democracy. Boundary structures are organizations that translate incommensurable viewpoints among group interactions (Carlile, 2004; Star & Greisemer, 1989; O’Mahony & Bechky, 2008), and exist at the points of intersection between different groups. Boundary practices are organizational processes and mechanisms that enable collaboration (O’Mahony & Bechky, 2008). In the Los Angeles case, ELA is a boundary structure; ELA translates incommensurable viewpoints between the Neighborhood Councils and the City bureaucracy in the effort to build a governance system that can effectively incorporate the knowledge and perspectives of both groups. ELA uses boundary practices to interface between the traditional electoral approaches of the City administrators and the local grassroots approaches of the Neighborhood Councils.

ELA’s boundary practices include ways ELA helps the Neighborhood Councils and the City bureaucracy identify and organize of converging policy interests (e.g. hosting a town hall meeting to discuss policy concerns of NC stakeholders and public officials, or commissioning action research projects that lead to shared benefits). These boundary practices include how ELA creates opportunities for interaction (e.g., setting up meetings between City officials and NC stakeholders, inviting City officials to neighborhood events where it is easier for local residents to participate). ELA’s boundary practices also include translational mechanisms, such as allowing parties to better understand one another and establishing clear processes for conducting business (e.g. facilitating training for NCs on how the legislative process works, inviting department officials to explain the effects of a proposed policy change, organizing internal meetings to strategize how best to convey
NC concerns to policymakers). Thus, how ELA engages in boundary practices has implications for how ELA is able to increase citizen participation and improve government responsiveness.

This study of how ELA engages in boundary practices and areas where it encounters challenges will show how boundary structures are a critical component of a Neighborhood Council system. In examining the Neighborhood Council system through boundary structures like ELA, this study also offers a means of evaluating the efficacy of the Neighborhood Council system as a means of democratic reform.

“Strong democracy” is a concept developed by Barber (1984) that describes a healthy democratic governance system in which citizens take an active and direct role in self-government. “Strong democracy” stands in contrast to “thin democracy” or the liberalizing and individualistic tendencies that result from citizenry ceding their political participation to elected representatives. Strong democratic systems are comprised of “institutions designed to facilitate on-going civic participation in agenda-setting, deliberation, legislation, and policy implementation” (Barber, 2004). The Los Angeles NC system was established as a rebuke of what was perceived as a “weak” representative system of government in LA. Furthermore, the NC system is a framework based on the strong democratic principles of activity, process, self-legislation, creation, and transformation, in pursuit of government responsiveness and citizen participation (Barber, 1984).

**Research Objective and Significance**

This research seeks to understand how cities employ boundary structures to bridge traditional electoral governments with more neighborhood-focused structures of stakeholder participation. This dissertation project will examine how ELA engages in boundary practices, how ELA staff ascribe meaning to those practices, and how these practices and their meanings fit into a
broader context of democratic reform. Through better understanding the character of the boundary structure of ELA, this study will illuminate the dynamics involved in neighborhood council approaches to democratic reform.

Although grassroots reform efforts push cities towards local governance and direct participation, how best to integrate democratic paradigms remains unclear. In the case of Los Angeles, ELA’s boundary practices play an important role in enabling reform. Therefore, this study of how ELA bridges paradigms of democracy is significant because it provides an original approach to understanding and connecting the theoretical and practical dimensions of the democratic reform process.

Research Questions

- How does ELA engage in boundary practices between the Neighborhood Councils and the City bureaucracy?
- How and why have ELA’s boundary practices have evolved over time?
- How are ELA’s boundary practices shaped by the principles of strong democracy and how do they shaped these principles in turn?

Research Approach

I conducted this single case study of the Department of Neighborhood Empowerment (ELA) in the City of Los Angeles over an 18 month period from November 2015 to May 2017. I used an inductive approach and qualitative data collection and analysis methods. My principal method of data collection was semi-structured qualitative interviews. There are many competing perceptions of the NC system in Los Angeles, ranging from petty critiques to passionate tributes, sometimes from the same informant. To better understand these inter-subjectivities, I used an open-ended data collection process, including interview, observation, and archival sources. This
qualitative data driven process yielded unexpected and complex revelations of individual and collective perspectives on the NC system, its implementation and role.

With the permission of the ELA General Manager and approval from the City Attorney, I conducted 45 hour-long interviews, with a total of 47 informants who were stakeholders from Neighborhood Councils, City leadership, Charter reformers, and ELA staff. With the exception of individuals with public views and public roles, who provided written consent, Informants are identified only by their stakeholder role. All interviews were digitally recorded and transcribed verbatim. Transcripts were then coded in atlas.ti and analyzed for themes and patterns centered on boundary issues, governance practices, and the principles of strong democracy.

I also conducted approximately 400 hours of naturalistic observation of ELA activities in a variety of settings, including the ELA office, Board of Neighborhood Commissioners meetings, NC meetings, and NC alliance meetings. Finally, I also conducted an archival analysis focusing on governance documents, legal analysis, training documents, newsletters, agendas, evaluation documents, and accounts of public controversy. However, this search was limited due to the loss of the ELA server archive. Both observation and archival data supplemented the primary interview data.

**Research Assumptions**

Based on my experience working in the public policy spheres of Los Angeles, I undertook this study with several assumptions relevant to the study parameters. First, I proceeded with the understanding that political power is highly concentrated in Los Angeles. The City Council, and the President of the City Council in particular, wields tremendous power to direct the City activities. In fact, Charter reform effort to re-balance power in favor of the Mayor was met with intense
resistance, and succeeded in making only incremental changes. The NC system grew out of the power struggle between Mayor and City Council. Thus, the very existence of the NC system, and its promise to diffuse power to the neighborhoods, represented a threat to the existing power structure.

Given the circumstances of its creation, I also assumed that there would be a diversity of perceptions about NC system from inside and outside. Opinions would vary regarding the facts of the NC system’s creation, its effectiveness, its accomplishments, its formal and informal roles, and its implications for governance in LA and beyond. This assumption served as the basis for my inductive research approach.

Finally, I assumed that the subject of Neighborhood Councils would be politically sensitive and that it might affect informants’ willingness to participate, or access to ELA. This assumption was not born out substantially. ELA leadership was eager to participate, and considered this study as an opportunity to learn more about how the department functioned. ELA also wanted to support more research on the NC system in general, and this study represented an opportunity to expand their own limited research capacity. Regarding the political sensitivity of the NC system, most informants felt that their thoughts and attitudes should be shared widely. However, informants typically insisted on confidentiality to protect themselves against political retaliation. This concern was shared by NC participants concerned about retaliation from ELA or elected city officials, ELA staff concerned about retaliation from elected city officials and NC participants, and elected city officials concerned about political retaliation from NCs and the voter base in their districts.
Findings and Contributions

The findings of this case study of the Los Angeles Department of Neighborhood Empowerment offer contributions in several areas. First, this study provides insight into how the ELA approaches its mission to support and oversee the Neighborhood Council system, contextualizes ELA’s place within the recent reform history of Los Angeles, illustrates the nature of ELA’s role as a boundary structure, and describes how ELA’s boundary practices have changed over time. Specifically, this study elucidates the dimensions of ELA’s boundary practices centered on the themes of policy, organizational process, and governance philosophy.

Five central findings emerged from this study:

1. NCs are an evolutionary process of governance, not a solution to a governance problem.
2. Power, both formal and informal, plays a central role in ELA practices and NC system dynamics.
3. ELA plays a central role in moderating the conditions of democratic governance.
4. ELA functions as a boundary structure across multiple boundaries simultaneously.
5. ELA functions as a boundary structure between system implementation and aspiration.

Ultimately, this study offers an improved understanding of the role, practices, and evolution of ELA, and has implications for cities interested in Neighborhood Council systems in pursuit of democratic reform.
Literature Review

Neighborhood Councils

Since the Industrial Revolution, socio-political development in the United States has prioritized large-scale urban oriented governance structures. Not only do these structures favor economies of scale, which dilute the individual voice, but they also tend to operate according to a public choice model of political activity. This model emphasizes the relationship between interest groups and political decision-makers, and is built on transactions based on economic rationality (Parlow, 2008). The increasing centralization of government and proliferation of economically-self-interested interest groups has been accompanied by increased mistrust of government and concern over the amplified influence of interest groups in local government decision-making (Deleon & Deleon, 2002; King, 1999; Nye, Zelikow, & King, 1997), political cynicism (Berman, 1997), and civic alienation (Pharr & Putnam, 2000). It has resulted in a decline in public participation in governance (Cooper & Kathi, 2005). These sociopolitical challenges have also led to a renewed effort to strengthen and restore civic engagement at the local level (Cooper & Musso, 1999).

Increasing civic engagement provides substantive, instrumental and normative benefits. Citizen participation improves the effectiveness and efficiency of the public sector and, in a democratic society, an active and engaged citizenry is a good in itself (Campbell & Marshall, 2000; Pratchett, 1999; Fiorino, 1990).

In the 1960s organized public participation increased beyond public hearings and other statutory requirements enabling individual members of the public to provide input in public policy. Civic engagement organization prototypes have included Community Action Programs (CAPs) and Community Development Corporations (CDCs), which, as the centerpieces of the War on Poverty’s
principle of civic republicanism, were obliged to include local stakeholders in their governing boards. At the same time, organizations such as Business Improvement Districts (BIDs) were developed to organize like-minded local stakeholders to pool civic resources to identify and advocate for their shared interests (Parlow, 2008). Neighborhood Councils, defined in Los Angeles as city certified groups of local stakeholders that advise on issues of concern to the neighborhood (Los Angeles City Charter art. ix, sec. 900), were born as a combination of this normative and instrumental pedigree.

Parlow (2008) views the general movement towards local government, and neighborhood councils specifically, as the pursuit of an alternative civic republicanism. This emphasizes deliberative processes to engage local stakeholders in solving local problems. The 2001 Los Angeles City Charter states that Neighborhood Councils are “to promote more citizen participation in government and make government more responsive to local needs” (Los Angeles City Charter art. ix, sec. 900). The Neighborhood Council Plan outlines six objectives for the Neighborhood Council system (see Table 1). These objectives specify both instrumental and normative goals for the Neighborhood Council system.

Table 1 - Plan for a System of Citywide Neighborhood Councils, 2001

<table>
<thead>
<tr>
<th>Goals and Objectives of the Los Angeles Neighborhood Council System</th>
</tr>
</thead>
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<td>1 Promote public participation in City governance and decision making processes so that government is more responsive to local needs and requests and so that more opportunities are created to build partnerships with government to address local needs and requests.</td>
</tr>
<tr>
<td>2 Promote and facilitate communication, interaction, and opportunities for collaboration among all Certified Neighborhood Councils regarding their common and disparate concerns.</td>
</tr>
<tr>
<td>3 Facilitate the delivery of City services and City government responses to Certified Neighborhood Councils’ problems and requests for assistance by helping Certified Neighborhood Councils to both identify and prioritize their needs and to effectively</td>
</tr>
</tbody>
</table>
communicate those needs.

4 Ensure equal opportunity to form Certified Neighborhood Councils and participate in the governmental decision making and problem solving processes.

5 Create an environment in which all people can organize and propose their own Certified Neighborhood Councils so that they develop from the grassroots of the community.

6 Foster a sense of community for all people to express ideas and opinions about their neighborhoods and their government.

Two principal components provide the theoretical foundation for the neighborhood council concept: scale of governance and participation. Both components include substantive, instrumental and normative dimensions, and most of the literature on neighborhood council theory focuses on how matters of scale and participation are addressed. Similarly, evaluations of neighborhood council systems focus on scale and participation, and the implementation of these concepts in practice.

Despite the promise of neighborhood councils to ameliorate the problems that accompany increasing size, diversity, and complexity, many cities do not look to this approach to improve civic engagement and participation. In fact, neighborhood council systems remain relatively uncommon among medium and large cities throughout the United States. There are several factors that may explain this, including constraints observed in this study as well as factors cited in the repeal of other cities’ NC systems.

First, not all cities confront the same challenges with representation. Other large cities like New York and Chicago have more city councilmembers per capita, providing better access to representatives for constituents.\(^3\) Also, some cities have other established means for local groups

\(^3\) New York average City Council district size is 167,000 residents; Chicago average Ward size is 54,000 residents; Los Angeles average City Council district size is 265,000 residents
to formally participate in government, and experience robust participation and advocacy from informal neighborhood groups, such as civic groups and faith-based organizations (Berry, Portney, & Thomson, 1993). So for many cities, an NC system does not offer improvement over the system they already have.

The cities that could benefit most from a reinvigoration of civic participation are often the cities where NC systems are most challenging to implement. Many American metropolises are “edge cities” with multiple civic centers, geographically isolated neighborhoods, with demographically segregated populations (Cooper & Musso, 1999). In addition, many large cities are characterized by sprawling metropolitan regions, which include sub-urban and ex-urban communities that may be separately incorporated. NC systems to serve these cities can be costly and complex to implement.

Beyond the logistical challenges, establishing NC systems require the political will of those with power. Although it is possible to create NC systems without formal powers, such as the NC system in Los Angeles, the formal city affiliation brings at the least a tacit informal power that carried the potential to challenge elected leaders. Furthermore, the prospect of creating new neighborhood interest groups can be unattractive to city leaders, many of whom regard NCs as some combination of aggravation and political competition. In fact, it is possible that the NC system would not have been established in Los Angeles if the City Council and Mayor were not desperate for public support to pass the Charter, which contained other elements that were important to their offices. The goal of an NC system to diffuse power to neighborhoods is premised on power being overly-concentrated, which creates a hostile environment for establishing NC reforms.
Finally, the recent repeal of the NC system in Seattle provides insight into the cost/benefit considerations of a NC system. In Seattle, City leaders found that instead of expanding participation and inclusion to all constituencies of the City, the NCs simply amplified established homeowner groups, perpetuating neighborhood inequalities (Bonjukian, 2016). Furthermore, role ambiguity and unclear objectives for the system contributed to the City’s decision to withdraw support from the NC system and explore alternative means of improving local participation (Seattle Department of Neighborhoods, 2016). These challenges also manifest in the Los Angeles iteration of NCs; however, the unique social-political context of Los Angeles has led the City to adapt to these challenges in different ways explored in detail in this study. Moreover, repeal of the NC system would require placing a politically unpopular Charter amendment on the ballot.

**Scale of Governance**

Neighborhood councils were a product of debates about the ideal scale of governance. As large public administration structures struggle with the ever increasing complexity of managing large sectors of jurisdictions of growing size and diversity, local governance structures were investigated as possible approaches to improving public administration. First, locals with first-hand knowledge and experience often know how to identify and fix local issues better than experts (Wynne, 1996) who may not be familiar with the specifics of the local context (Innes & Booher, 2010). Moreover, local voices are expressed in community settings that provide greater connectivity and increase durability in the relationships between citizens and decision-makers (Evers & D’Silva, 2009). Using local knowledge can result in more responsive services and better designed interventions (Bachrach & Botwinick, 1992; Irvin & Stansbury, 2004). Furthermore, local governance provides an opportunity to include the voices of individuals in a meaningful way. By
giving marginalized people an opportunity to impact decisions that affect them, local governance supports a more just and authentic democracy (Innes & Booher, 2010).

Local governance and prioritizing local knowledge are especially relevant to the Neighborhood Council system. The Neighborhood Council system was constructed to provide City administrators with access to local knowledge to better provide services. In this vein, Box and Musso (2004) suggest that Neighborhood Councils operate as sub-units in a local federalist form of governance. Rather than representing a share of the decision-making for citywide affairs, NCs use the City mandate to respond in their own way (Weare, Musso, & Crigler, 2008) to their own geographically unique subset of issues (Box & Musso, 2004). In addition, the system elevates voices of neighborhood stakeholders to decry problems and injustices that, while perhaps insignificant on a citywide scale, are acute at the local level.

Citywide administrative structures, however, can offer important practical benefits. Economies of scale allow for the provision of services that would be unaffordable for local jurisdictions. Police, fire, sewer, school, waste removal, public amenities such as parks and museums, transit, utilities and others would all see different levels of service if they were provided at the neighborhood scale. As a structure, the neighborhood council system also takes advantage of the benefits of citywide scale. Regional collaboratives among NCs (South Los Angeles, North San Fernando Valley), or sector-oriented collaboratives (land use, DWP), join together to convey the neighborhood stakeholder perspective of citywide issues. The fact that more than 90% of the City of Los Angeles falls within a NC district, certainly conveys the potential breadth of the NC system’s relevance. Furthermore, the fact that nearly the entire City is represented by a neighborhood council supports the system’s normative goal: to ensure equal opportunity for neighborhoods to
organize. Finally, NCs receive both financial and administrative support, as well as oversight, from the City that likely could not be provided at the neighborhood scale.

Neighborhood council discussions of scale are not limited to citywide versus local, but also must include centralized versus polycentric. As Ostrom, Tiebout, and Warren (1961) observe, the polycentricity is framed in contrast to “gargantua,” a metropolitan system with a superstructure of larger units. The dichotomy between centralized and polycentric is built on the assumption that the overlapping jurisdictions of gargantua are duplicative, chaotic, and generally problematic. Polycentricity, on the other hand, connotes independent decision-making centers that are able to develop interrelationships in the interests of their more narrowly focused jurisdictions. However, Ostrom et al. (1961), argue that these approaches must be balanced to maximize public goods. The grounded perspective of the polycentric sub-units ensures that the gargantuan system does not overlook local needs, while the scale of the gargantuan jurisdiction ensures that the individual sub-units of the polycentric system do not tune out macroscopic issues. This is relevant to NCs because as a citywide system of councils, each NC is responsible both for dealing with its singular local issues and also for weighing in on broader shared citywide issues.

Polycentric governance, additionally, is premised on the interaction between public and private interests and market forces. A “compound republic” (Ostrom et al., 1961) “[embodies] institutional diversity reflected in multi-level, multi-purpose, multi-sectoral, and multi-functional units of governance” (Araral & Hartley, 2014, p 2). Polycentric governance therefore extends beyond the formal structure of government and acknowledges the tacit governing legitimacy of private and lay institutions. This conceptualization expands the legitimacy of governance bodies to include not only different scales of governance, but also different sectors of society. Traditionally,
polycentric governance structures build external agreements to expand the reach and inclusiveness of broad governance collaboratives rather than creating local-level neighborhood layers of formal governance structures. However, the polycentric model is relevant to NCs because, in representing local interests, they mobilize local stakeholders from a variety of sources, indeed “everyone who lives, works or owns property in the area” (Los Angeles City Charter art. ix, sec. 900). Participation is not limited to public officials or those with a formal role in governance. In addition, NC work calls for collaborating with non-governmental organizations and local businesses and thus enlists a multi-sectoral coalition to advocate and advise on local issues. The charter reform that created Neighborhood Councils gave these informal local coalitions a fully legitimate position as a relevant stakeholder regardless of their relationship to the formal structures of power.

**Participatory Governance**

The approaches of large jurisdictions to public administration can be placed on a spectrum between highly bureaucratic and highly participatory. One end of the spectrum has its roots in Hobbes’ Leviathan or Weber’s rational progressive society, where the state acts unilaterally on behalf of its citizens (Bachrach, 1967). Rational progressive regimes embrace the efficiencies of size by favoring consolidation and centralization, and are exemplified in many of the large public departmental entities of governments today. Such entities emphasize bureaucratic structure, standardization, and economies of scale to provide uniform cost-efficient services. Large bureaucracies struggle to achieve the flexibility necessary to administer nuanced situations or provide stakeholders with a real voice, whose input is generally restricted to voting in elections.
Participatory democracy, on the other hand, prioritizes the engagement and activity of the governed over the inertia of centralized administration. Berry, Portney and Thomson (1993) identify public participation, government responsiveness, and empowerment as the means to overcome civic anomie and establish strong democracy. Their case study of five US cities indicated that neighborhood governance structures increase the level of participation in direct action, exact responsiveness from City hall, and help foster a sense of community (Berry et al., 1993). The Los Angeles Neighborhood Council system has adapted the principles of participatory democracy outlined in Berry, Portney, and Thomson’s work to accommodate local conditions and political tastes.

Not all participation is created equal. Arnstein’s (1969) participation classification system presents a scale that identifies degrees of intensity for meaningful citizen participation in government. At one end of the scale are the more superficial levels of participation, where citizens have little control over how they participate or how much of the substance they contribute is incorporated into public policy. At the other end of the scale are more substantial avenues for participation that allow citizens to make substantive contributions and also exercise control over the terms of their participation. The higher levels of participation emphasize the instrumental, substantive and normative benefits of citizen participation. On the other hand, the lower levels of participation at best expropriate the contributions of participants and at worst tokenize and placate citizens in a disempowering way (Arnstein, 1969).

Building on Arnstein’s scale of participation, Quick and Feldman (2011) draw a distinction between the concepts of participation and inclusion. Participation practices entail efforts to increase public input oriented primarily to the content of programs and policies, and have more of an instrumental focus. Inclusion practices entail continuously creating a community involved in co-
producing processes, policies, and programs for defining and addressing public issues, and have more of a normative and substantive focus (Quick & Feldman, 2011; Fiorino, 1990). Participation is not enough; it constrains groups within exclusive structures and does not allow them to bring their resources to bear on the actual issues. Furthermore, participation does not alter the hierarchal paradigm, leaving a system that is less democratic and less responsive to design and implementation ideas. Inclusive practices emphasize civic deliberation and discovery, which allow for innovation rather than static reification of roles (Feldman, Khademian, & Quick, 2009). Two-way capacity building (Chaskin & Garg, 1997; Elmore, 2005; Musso et al., 2011), through which neighborhood groups can inform the structures that govern them, is also a feature of inclusive practice.

A democratic structure that emphasizes inclusive practices that elicit “broad public participation in a process which provides citizens an opportunity to consider issues, weigh alternatives, and express a judgment about which policy is preferred” is a deliberative democracy (Weeks, 2000). Deliberative democracies use collaboration to design public services that reflect common values. The Neighborhood Participation Project (NPP) was an action research program that brought together several Los Angeles Neighborhood Councils with City administrators to engage in collaborative vision development, problem solving and service planning. The deliberations facilitated by NPP allowed participants to redefine heretofore intractable problems and led to formal agreements between City departments and Neighborhood Councils (Cooper and Kathi, 2005). Cooper and Kathi describe deliberative democracy as a coproduction process, “joint provision of public service [in this case, collaborative learning] by public agency as well as by service consumers” (Cooper and Kathi, 2005, p. 47). This meaningful collaboration in service delivery provides a meaningful avenue for citizen participation, promoting empowerment (Evans,
1996), and fostering social capital (Ostrom, 1996; Putnam, 1995). Accordingly, deliberative
democracy serves both the instrumental and normative goals of the Neighborhood Council system.

**Boundary Organizations**

The literature cited describes the conceptual premises and historical precedents for the
development of the Los Angeles Neighborhood Council system. Neighborhood councils are
developed as a grassroots response to the struggles of traditional electoral systems to govern
growing and increasingly diverse jurisdictions. Neighborhood councils favor the localization of
grassroots over the macroscopic citywide view. The traditional electoral paradigm is built on
representation and elite knowledge; the grassroots paradigm is built on direct participation and
non-expert knowledge. Neighborhood councils also promote a decentralization of power among
an active citizenry. Traditional electoral paradigms govern through a centralized administrative
structure and are guided by a small group of officials; the grassroots paradigm governs through
polycentric nodes in local communities and was guided by a multi-sectoral group of local
stakeholders. Thus, a formal neighborhood council system employs elements of grassroots
democracy but must engage with traditional electoral democracy. These paradigms are in tension,
and to succeed together, they must build on each other’s strengths and not allow their differences
to undermine their shared goals of democratic governance.

In the context of participatory reform, grassroots democracy and traditional electoral
democracy are juxtaposed. However, cities that create formal neighborhood council systems
endeavor to join the two governance systems productively. For this reason, the concept of
boundary structure is useful for examining neighborhood councils. Generally, “boundary
structure” describes an idea, a concept, an artifact, or a discourse that allows different groups to
communicate across domains – groups, etc. This communication, which entails either practical translation, epistemic interpretation, or both, crosses the boundaries of groups; boundary structures facilitate communication.

Situated between the City of Los Angeles and the Neighborhood Councils, ELA moderates their “knowledge boundaries,” or spaces in between domains of work where organizations struggle to maintain lines of communication (Carlile, 2002). For entities that must work in concert, like those within a single governance system, boundaries can function as barriers, separating entities, or they can function as junctures, “translating across, aligning among, and decentering differences” (Quick & Feldman, 2014). Boundary structures, like ELA, can function in both capacities and take different forms.

“Boundary objects” are collections of boundary practices that translate viewpoints across group interactions during temporary instances of collaboration, to align various epistemological norms and to achieve practical objectives (Star & Greimsem, 1989). Situations that call for more prolonged collaboration, or that involve structural relationships between distinctive groups, may require more than a temporary artifact to navigate instances of alignment and instead call for a “boundary organization” (O’Mahony & Bechky, 2008). This approach allows for the examination of repertoires and regimes in the context of collaboration between organizations with shared practical objectives but contested values, or shared values but distinct repertoires. In their analysis of a boundary organization in a working collaboration, the authors conclude that rather than dissolving boundaries and bringing groups’ values into closer alignment, these boundary organizations actually create a buffer that allows groups to delineate shared objectives and yet maintain their distinct identities.
Boundary practice theory also draws from the collaborative management literature. Multi-level and multi-sectoral coordination among public agencies, or “collaborarchies,” engage in collaborative management, a process “of facilitating and operating multi-organizational arrangements to solve problems that cannot be solved, or solved easily, by a single organization” (Agranoff & McGuire, 2003, 4). This conceptualization acknowledges the shortcomings of classical management strategies to overcome “intractable” (Agranoff, 2012) or “wicked” (Batie, 2008) problems that intertwine utilitarian and deontological value systems.

Boundary structures, boundary practices, and collaborative management are all concepts relevant to the Neighborhood Council system. The system is a combination of two distinct approaches to democracy. Since the inception of Neighborhood Councils in Los Angeles, inherent incompatibilities in governance approaches between the City bureaucracy and the councils themselves have hindered the Neighborhood Council system’s ability to work effectively. Subsequent evaluations have highlighted boundary problems, manifesting in concerns about how stakeholders participate, how Neighborhood Councils represent their districts’ interests, and how well equipped the councils are to interface with the City and enact change (Musso, et al., 2007; Musso et al., 2004). How Neighborhood Councils bridge the boundaries between grassroots and traditional electoral paradigms of democracy has not been addressed in the literature to date.

The Department of Neighborhood Empowerment (ELA) is the City department responsible for supporting and overseeing the Neighborhood Council system. It has a dual mandate to help and advocate for Neighborhood Councils with the City bureaucracy as well as hold the Neighborhood Councils accountable to the City bureaucracy. ELA serves as a conductive organization that brings together stakeholders including, NCs, City departments, and City decision-
makers, to solve the City’s intractable problems. ELA also serves as a boundary organization and engages in boundary practices to transmit knowledge between the grassroots entities and the City’s traditional electoral structures. These responsibilities situate ELA between Neighborhood Councils and the City, and place ELA at the boundary between two paradigms of democracy.

Research cited above evaluates and dissects some of the policy issues and outcomes resulting from the initial stages of the Neighborhood Council implementation through both theoretical analyses and applied program evaluation and performance outcomes. The literature also examines how participatory or inclusive structures can help to manage the dual mandates of administrative efficacy and governmental legitimacy in large heterogeneous municipalities. In addition, the literature examines how Neighborhood Councils respond to systemic concerns regarding representation, particularly in navigating plural interest groups at various scales of governance. Research specific to the Los Angeles Neighborhood Council system further discusses issues of representation, legitimacy, efficacy, participation and inclusion, and their applications in detail.

Despite the department’s central role in mediating the boundary between NCs and the City bureaucracy, the literature has not addressed the role of ELA in Los Angeles, nor its analog departments in other cities. Furthermore, no research has examined the processes by which NC policy priorities become integrated into the City’s policy priorities. Because increasing civic engagement and government responsiveness to local priorities represent the guiding objectives of the Neighborhood Council system, this is a significant gap in the literature. Finally, the boundary practice literature has not examined the role of boundary structures in facilitating alignment among structures with different approaches to governance. This dissertation proposes to make
this connection by examining ELA’s boundary practices, how they affect the implementation of the Neighborhood Council system, and the implication of ELA’s boundary practices for democratic reform efforts.
Methodology

Introduction

In order to examine the following primary lines of inquiry: 1) how ELA engages in boundary practices between the Neighborhood Councils and the city bureaucracy – and how this is managed, 2) ELA’s boundary practices and their evolution, and 3) how ELA’s boundary practices shape and are shaped by the principles of strong democracy – we employed several methodologies.

We now discuss the procedures and rationale for research approach, study design, sampling practices, data attributes, data collection, data analysis, validity and reliability, ethical considerations, and overall study limitations.

Research Approach and Study Design

This research employed a case study design to examine the Los Angeles Department of Neighborhood Empowerment. A case study research strategy attempts to: a) examine a contemporary phenomenon in its real-life context, and b) examine boundaries between the phenomenon and context that are not clearly evident (Yin, 1981). Because ELA’s boundary practices both inform and are informed by multiple actors, their priorities, and their environments, the case study strategy is most appropriate. This case study focused on how ELA functions as a boundary structure within the Neighborhood Council system, specifically, the “consequential ways of doing [the] everyday activities” (Reckwitz, 2002) that comprise boundary practices. I examined what actors say and do at ELA, how their actions are ordered and contingent, how other actors at the NCs or the city departments respond and with what consequences, and how patterns of action are perpetuated and change over time.
A case study format works well within an enclosed organizational unit such as ELA, and allows my approach and findings to provide an example for other cities that may be interested in examining the formal municipal mechanisms of their own Neighborhood Council systems. For example, as this research was underway, Seattle’s Neighborhood Council system experienced a radical transformation at the hands of city leaders frustrated by dysfunction they perceived in the system. Finally, the case study approach allows the use of a unique combination of concepts from an array of fields with which to dissect in detail unique features of the case including: urban planning, public administration, political science, organizational management, democratic philosophy, local history, and critical theory.

In addition, I used an inductive approach to study ELA’s boundary practices. My conceptual framework identifies substantive analytical categories and articulates their relationships; however, the answers to my research questions emerged from how well data fit these conceptual categories of boundary practices, how well the categories explain or predict ongoing interpretations of ELA’s boundary practices, and how relevant the categories are to the core issue of bridging paradigms of democracy (Suddaby, 2006). This allowed my analysis to remain logically consistent with existing theory, and also respond to the intersubjective experience and knowledge production activities of ELA. In addition, it allowed my data collection and analysis to continually inform the emerging theory about ELA’s boundary practices, which ultimately helped me understand the situated social meanings I am studying (Glaser and Strauss, 2008).

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This case study employs qualitative data collection methods, including key-informant interviews, participant observation, and archival examination. The research questions for this study focused on “how” and “why” questions surrounding ELA’s functions and purpose, requiring depth and detailed explanation, observation with human interpretation, and critical reading of historical accounts. Quantitative data on the other hand is better suited for examining “what?” and “how many?” questions with strictly defined parameters. Because this case study sought to understand these nuanced and varied conceptions and perceptions and to do so with an inductive approach, qualitative data collection methods offered the most appropriate means of responding to the research questions. This research study began in summer 2015 and formally ended spring 2018.

Table 2 - Research rationale

<table>
<thead>
<tr>
<th>Research Question</th>
<th>Rationale</th>
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<tbody>
<tr>
<td>How does ELA engage in boundary practices between the Neighborhood Councils and the City bureaucracy?</td>
<td>How does the NC system work? What is ELA’s role in the NC system? What does ELA do? How does ELA work with City and NC stakeholders? What are some specific strategies or practices that ELA uses?</td>
</tr>
<tr>
<td>How and why have ELA’s boundary practices have evolved over time?</td>
<td>How has ELA changed? How has the NC system changed? How has the environmental context changed? What factors have driven changes to the NC system or ELA?</td>
</tr>
<tr>
<td>How are ELA’s boundary practices shaped by the principles of strong democracy and how do they shaped these principles in turn?</td>
<td>What are NCs? What is their role in the broader system of governance? How do the goals of the NC system affect ELA, city, and NC practices? Have the system’s goals been achieved?</td>
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</table>

Research Site

The case focuses on the Los Angeles Department of Neighborhood Empowerment (ELA).

ELA is the City department that was established as a part of the 2001 charter reform to oversee
and administer the Neighborhood Council system. As such, ELA is positioned within the boundary space between the “Community” and the “City.” Specifically, ELA facilitates relations between the City’s centralized bureaucratic government represented by City Hall and the 96 Neighborhood Councils. ELA is directed by a General Manager, a City executive who reports to the Mayor and city council. The 29 current staff members represent roles in accounting, administration, field support services, outreach, elections, training and capacity building, technical support, and special projects. ELA is a boundary organization tasked with facilitating the goals of both the City bureaucracy and NC organizations.

I chose ELA as the subject of a single case study because it is a unique example of a civic-oriented boundary organization for several reasons. First, Los Angeles is distinct among municipalities that have attempted to formalize Neighborhood Council systems within their systems of government. As a large city in terms of both population and geographic scope, Los Angeles is also racially, ethnically, and economically diverse. Los Angeles fits the paradigm of a modern city struggling to adapt its traditional governance structures to meet the new, different and growing needs of its residents, and suffers from extremely low voter engagement (15.9% voter turnout in the 2015 election). In fact, the development of the Los Angeles Neighborhood Council system was part of a broad charter reform effort instigated by a major crisis in confidence when, between 1997 and 2002, nearly one third of the city attempted to secede, largely in protest of poor electoral representation and government responsiveness (Sonenshein, 2013). Thus, the system in Los Angeles stands in contrast to other Neighborhood Council systems that tend to cover

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smaller and more actively engaged cities, or a much smaller proportion of larger cities (Berry et al., 1993).

In addition, the Los Angeles Neighborhood Council system is only partially formalized. Neighborhood Councils are funded and overseen by the city through ELA. NC board members are elected, and Brown Act requirements regarding the conduct of public meetings are observed by NCs. However, board members are not sworn public officials, and Neighborhood Councils have only an advisory function and no formal decision-making powers regarding city policy: “Neighborhood Councils shall [...] have an advisory role on issues of concern to the neighborhood” (Los Angeles City Charter art. ix, sec. 900). This makes the Los Angeles system a unique hybrid, neither a formal decision-making body nor an informal collection of unaffiliated civic engagement groups (Berry et al, 1993).

Finally, Los Angeles is exceptional in that the architects of the system sought to minimize central control over the Neighborhood Councils to allow them to “evolve organically from the grassroots” (Musso et al., 2007). This flexibility extends to ELA. The responsibilities laid out in the Neighborhood Council Plan (Los Angeles, 2001) involve vague terminology such as “assist,” “promote and facilitate,” and “help coordinate,” and few explicit directives. As a result, ELA, at least ostensibly, maintains significant flexibility in carrying out its mission to increase meaningful citizen participation and government responsiveness. This fact gives ELA the ability to interpret and adapt its practices in response to emerging needs and developing priorities.

Los Angeles’ unique character suggests that the Neighborhood Council system will face unique implementation challenges in contrast with other cities experimenting with participatory democracy structure. Furthermore, the flexibility granted to ELA to address these challenges is
also unique, and provides an opportunity to observe how a boundary organization might behave when given the freedom to pursue its mission in a self-directed manner. For these reasons, I believe the ELA case is useful for understanding how cities can approach multilateral strategy formation while balancing authoritative power with responsiveness and democratic accountability.

Los Angeles Department of Neighborhood Empowerment.

Established by the 2001 charter, ELA is one of the youngest city organizational entities and remains one of the smallest in size. ELA also remains one of its most turbulent organizations. In the last 15 years, ELA has swelled in size to over 60 staff during the certification process that saw the creation of the bulk of the current 96 Neighborhood Councils, and then shrunk to 17 staff during the Great Recession budget crisis.

At its largest point, ELA occupied multiple field sites as well as a central office near City Hall in downtown Los Angeles. Currently, ELA has consolidated space and occupies the 20th floor of City Hall and the 4th floor of the Van Nuys City Hall building. Other staff affiliated with ELA functions are located in the City Clerk’s office.
ELA is divided into five principal units that have overlapping functions. Policy (and Government Relations) oversees the policy goals of the NC system, provides support to the Board of Neighborhood Commissioners (BONC), and provides legislative analysis to NCs. NC Operations conducts capacity building training with NCs. Outreach (and Communications) supports NCs in conducting community outreach and also oversees the NC elections process in collaboration with the City Clerk’s Office on a biennial basis. Systems provides data-management, website, audio-visual, and social media technical support. Administration oversees internal departmental operations, departmental budgeting, and sets policy for the department. Neighborhood Council Funding, which oversees the NC funding program, previously fell under Administration but has since been moved to the City Clerk’s Office. That unit regularly interfaces with Administration and other ELA units to reconcile NC budgeting.

With the exception of Systems and Administration, each of the ELA units also provides field support. Each unit is comprised of Neighborhood Council Advocates (NCAs), or field staff, each of whom has an assigned case-load of NCs. These field staff provide field-based support to
Neighborhood Councils, by attending meetings and fielding questions and requests for assistance from the ELA office. This group of staff across the Policy, NC Operations, and Outreach units, is called the “Field Team.”

**Sampling Practices**

Within the case study of ELA practices, my pool of informants was broad, including individuals who had participated in the NC system in any capacity from its theoretical conception to its current form. I selected key-informants through a process of combined purposive, convenience, and snowball sampling (Frankfort-Nachmias & Nachmias, 2008), targeting informants based on their role relating to ELA specifically and the Neighborhood Council system more broadly. I began my observation and interviewing at ELA, which provided me with access to other NC activities. While observing ELA activities and routine practices, I attended meetings, trainings, and events where ELA staff interacted with NC stakeholders and members of various city departments and elected offices. These observation sessions provided opportunities for me to introduce myself to potential informants with whom I could follow up and recruit. In some instances, particularly for historical perspectives on Charter reform, I conducted cold call outreach. Conducting outreach based on observation sessions also allowed for me to purposively select informants participating in different capacities. For instance, I targeted a specific Neighborhood Council Advocate because of her role facilitating a capacity building training, as well as a Neighborhood Council board member who participated in the training. These two informants provided a different perspectives on the meaning of the same activities and contextual triangulation (Roth & Mehta, 2002).
Interviewees included informants from ELA, the Board of Neighborhood Commissioners, Neighborhood Council board members, City Clerk’s office, City Administrative Office, the Office of Public Accountability, City Council offices, the mayor’s office, including several current and former elected officials, and various participants involved in charter reform and Neighborhood Council review. I attempted to recruit multiple informants from each of these groups, as well as representatives of NCs from each major region of the city, in order to capture issues and perspectives unique to each group and region. Because ELA was not a large department and it may have been difficult to hide who on staff participated in the study, I attempted to interview the entire staff. Moreover, this allowed me to collect information from staff with a diversity of backgrounds, including new hires, veteran staffers, members of each staffing unit, former NC participants, and former staffers in elected offices. Some of the interview participants occupied multiple roles and thereby had multi-dimensional perspectives. For instance, some ELA staffers had previously worked in City Council offices or served on a Neighborhood Council. Similarly, some staffers in elected officials’ offices had previously participated in Neighborhood Councils. I specifically targeted informants who had occupied multiple roles due to their ability to hold and potentially share multiple perspectives regarding the NC system.

I also used snowball sampling based on the referrals of informants who recommended interviewees with unique perspectives or a particular depth of knowledge regarding a specific aspect of the NC system. Snowball sampling also allowed me to make use of “gatekeepers” who could assist me in accessing prospective informants who were otherwise hesitant to speak with me. This method of sampling and outreach was particularly helpful for contacting and recruiting
informants who participated in Charter reform, many of whom no longer work in the same capacities or even still live in Los Angeles.

**Data Collection**

This case study used three methods of data collection to illuminate how ELA engages in boundary practices between the city bureaucracy and the Neighborhood Councils: key-informant interviews, naturalistic observation, and archival sources. I established access to ELA through contacts from my professional background in Los Angeles City and County policy advocacy and organizing. I met with Grayce Liu, the General Manager of ELA, on multiple occasions both to discuss civic engagement issues broadly and also to explore collaborative research opportunities specifically. She agreed to provide access to ELA workspaces, ELA staff, and ELA data. In addition, many of the meetings and events I observed were open to public access, as was the archival data.

**Data Overview.**

Interviews with key informants provided data that describes routine activities, priorities, specific strategic initiatives, and stakeholder attitudes towards city governance. In addition, interviews provided an understanding of how ELA staff and other system stakeholders ascribe meaning to ELA’s work, and the Neighborhood Council system as a whole, within the broader context of democratic governance. Naturalistic observation of ELA activities and meetings between ELA, NCs and City departments, as well as shadowing of ELA personnel, provided additional data. That data describes specific activities that comprise boundary practices, including how organizational relationships are structured at ELA, how interactions are conducted among ELA and other actors, how strategic initiatives are evaluated by ELA, and ELA decision-making processes. Archival review provided information about timelines of events, when strategic
initiatives were undertaken, which actors were involved, the recorded commentary, and environmental and political contexts. Archives included ELA and NC agendas, Community Impact Statements, City Council minutes, Charter evaluation and reform documents, the Administrative Code, reports and evaluations on NC activities and performance, as well as media coverage.

Table 3 - Research Question data typology

<table>
<thead>
<tr>
<th>Research Question</th>
<th>Interview Data</th>
<th>Observation</th>
<th>Archival</th>
</tr>
</thead>
<tbody>
<tr>
<td>o ELA engages in boundary practices between the Neighborhood Councils and the city bureaucracy • How is this managed?</td>
<td>• Description of practices • Explanation of rationale • Perspectives on historical events</td>
<td>• Observation of actions, behaviors, spatial relationships, affect involved in practices • Observation of steps involved in practices</td>
<td>• Formal guidelines, rules governing practices</td>
</tr>
<tr>
<td>o ELA’s boundary practices have evolved over time. • How and why is this the case?</td>
<td>• Description of changes, impact of changes • Explanation of rationale for change</td>
<td>• Documented history • Formal reports that support decision-making • Media coverage of events</td>
<td>• Governing principles, mission statements • Strategic plans in pursuit of mission</td>
</tr>
<tr>
<td>o ELA’s boundary practices shape and are shaped by the principles of strong democracy. • How does this recursive process unfold?</td>
<td>• Explanation of decision-making rationale • Description of conceptualizations of democratic governance</td>
<td>• Observation of dynamics - practices shaping principles versus principles shaping practices</td>
<td>• Governing principles, mission statements • Strategic plans in pursuit of mission</td>
</tr>
</tbody>
</table>

Interviews.

The primary method of data collection was key informant interviews (Frankfort-Nachtmias, & Nachtmias, 2008). I conducted a total of 44 interviews during a one (1) year timeframe from

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⁶ 46 informants, two interviews included two informants in a single interview
December 2015 to December 2016. These interviews were qualitative in nature and focused on developing detailed descriptions, integrating multiple perspectives, describing processes, learning how events and practices are interpreted, and bridging inter-subjectivities (Weiss, 1995). I worked from a basic interview guide (Appendix A), I asked open-ended questions to prompt detailed descriptions of processes and perspectives and used probes to delve into responses. This open-ended approach was well-suited to my inductive study design.

The questions directed informants to reflect on their role at ELA, ELA’s practices, ELA’s role as a boundary organization, and the rationale behind ELA’s boundary practices. In addition, these interviews helped me interpret the meanings of observed practices and the rationale behind them. For informant interviews I targeted individuals who had been involved in the NC system in some capacity since its conception. Furthermore, I targeted stakeholders who had interacted with ELA as a result of their involvement in the NC system and had experience with their boundary role.

These informants include:

- **ELA staff**: Managers, outreach staff, administrative and support staff. Each of these types of informants provided insight into internal protocols and practices, interactions with other groups, as well as the rationale behind strategic decision-making. This group included both new hires, veteran staff, and former staff to provide a range of perspectives.

- **Neighborhood Council Stakeholders**: NC board members and other individuals involved in NC activities and advocacy. These NC informants provided insight regarding the history and formation of the NC system, its current status, as well as a range of experiences with ELA’s
boundary practices over the years. This group included current and former board members, Alliance\(^7\) members, and Alliance leadership.

- **City representatives**: Elected office staff and members of the bureaucratic departments who routinely interact with ELA or the Neighborhood Councils. These participants included members of the Board of Neighborhood Commissioners (BONC), City department staffs, and staffs for members of the City Council and Mayor. They provided insight regarding ELA’s role in the City, the NC system’s role, and also context regarding how and why some NC system strategic initiatives were realized and others were not.

<table>
<thead>
<tr>
<th>Informants</th>
<th>Group</th>
<th>Role</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>ELA Staff</td>
<td>Executives</td>
<td>GM and Unit Directors</td>
</tr>
<tr>
<td>7</td>
<td>ELA Staff</td>
<td>NCAs</td>
<td>All units, new and veteran</td>
</tr>
<tr>
<td>7</td>
<td>ELA Staff</td>
<td>Admin</td>
<td>Admin, funding, TUX, elections</td>
</tr>
<tr>
<td>2</td>
<td>System Stakeholder</td>
<td>Former ELA staff</td>
<td>Executives</td>
</tr>
<tr>
<td>4</td>
<td>System Stakeholder</td>
<td>Miscellaneous</td>
<td>BONC, local media, NC review commission</td>
</tr>
<tr>
<td>4</td>
<td>System Stakeholder</td>
<td>Charter Reform</td>
<td>Appointed &amp; Elected</td>
</tr>
<tr>
<td>6</td>
<td>City Stakeholder</td>
<td>Elected Offices</td>
<td>Staffers, elected officials, former elected officials</td>
</tr>
<tr>
<td>3</td>
<td>City Stakeholder</td>
<td>Bureaucratic Staff</td>
<td>OCA, CAO office staff</td>
</tr>
<tr>
<td>4</td>
<td>NC Stakeholder</td>
<td>Alliance Leadership</td>
<td>Regional, Topical Alliances</td>
</tr>
<tr>
<td>4</td>
<td>NC Stakeholder</td>
<td>Board Members</td>
<td>Four different LA regions</td>
</tr>
</tbody>
</table>

| 46 | Total |

I received strong support for this study from the General Manager of ELA, who was aware of ELA’s complex role in city government and wanted to both gain and share a better understanding of it. As a result, she pledged full cooperation from ELA staff in both observation and interviews, provided a desk for me to use when I was on-site at ELA, and arranged for me to get security clearance to access the building and office. Although there were no pre-conditions on

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\(^7\) A Neighborhood Council Alliance is a semi-formal collaborative of NCs
interviewing ELA or other staff, many expressed concerns that their responses, particularly their critiques of the ELA, the NCs, or elected leaders, might put them in a vulnerable position. Thus, I made extra effort to accommodate confidentiality concerns by interviewing staff off-site, and also by interviewing nearly the entire staff to make it more difficult to attribute perspectives. Also, due to their sensitive position, ELA stakeholders requested no attribution of direct quotes without advance approval, a request which that I accommodated.

I began data collection with bi-weekly observation sessions at ELA and off-site meetings, such as BONC and Alliance meetings. In these environments, I introduced myself, asked questions, and began interacting with participants informally. After several weeks of developing informal relationships, I began recruiting interview informants. The only recruitment efforts that were rebuffed were from the City Attorney’s Office staff, who instead sent a collection of relevant documents about the NC system, and from a City Council office staffer. I was surprised to find that, apart from general concerns about intra-departmental politics and intra-City politics, all of the informants were enthusiastic to share their perspectives on the NC system. Most informants held a range of feelings towards the NC system from inspiration to dissatisfaction, and were willing to share stories and elaborate on specific experiences and dynamics.

The informal and collegial nature of my relationships both within ELA and among NC stakeholders facilitated a free-flowing conversational interview. I recorded interviews and later transcribed them to foster rapport and maintain a stronger interview presence. Staff at ELA, in many ways, are beset on all sides, answering to both City leaders and NCs. Many were eager to share their story with someone interested in the ELA perspective. Similarly, NC participants were eager to share their perspectives without concern for retaliation from ELA. City stakeholders were
eager to share their perspectives without concern for political blowback. Finally, system stakeholders were eager to share what many of them considered to be an inspired and groundbreaking achievement in democratic reform. This enthusiasm translated to 44 hours of interviews, rich with data. Also, due to overwhelming interest from study participants, I had to triage data collection opportunities, as I was referred to more informants, given more documents, and invited to more meetings than I could possibly accommodate.

Ultimately, interviews allowed me to gather data about how ELA functions as a boundary structure between the City and the NC system. This data includes substantive information regarding ELA practices, how processes are executed, how decisions are made, and how practices change over time. This data also includes commentary about how participants make sense of ELA’s role as an organization within broader democratic governance structures, and how the Neighborhood Council system has been a part of democratic reform efforts in Los Angeles.

Observation.

The secondary data collection method was naturalistic observation. To identify and attend meetings where ELA engaged in boundary practices, I was in the field two (2) days per week for a year, totaling in 66 discreet observation sessions and approximately 200 hours of observations. 8 I observed ELA operations and internal ELA meetings, 9 Board of Neighborhood Commissioner (BONC) meetings, 10 ELA training sessions and seminars, 11 Neighborhood Council meetings, 12

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8 This count total does not include interview sessions or meetings where observations did not take place.
9 37, including 33 at City Hall, 4 at Van Nuys City Hall
10 Five, including three at City Hall, Wilmington, Venice
11 Five, including two at CSULA Downtown Campus, CBS studios, Boyle Heights City Hall, LAPD Headquarters
12 Three, Downtown LA NC, Venice NC, Lincoln Heights NC
Neighborhood Council sponsored events, Neighborhood Council regional or issue-oriented Alliance meetings, as well as public hearing settings where ELA may mediate between NCs and the City boards or departments. During this time, I was stationed at the ELA main office and observed routine ELA activities by shadowing ELA staff (Czarniawska, 2008). Based on the practices that I observed, I identified settings to conduct additional focused observation.

Naturalistic observation allowed me to capture practices in their natural context (Emerson et al., 1995). Many different pieces of data could be incorporated into a particular boundary practice: the actors involved, the space or non-spatial medium in which practices were conducted, non-human items such as technology, physical movements, as well as attitudes and beliefs. I recorded as much of these data as possible through naturalistic observation. In addition, naturalistic observation allowed me to see and interpret what actually happened in a specific situation, and not simply what was reported to have happened by a person or organizational record.

Furthermore, because practices are situated actions, boundary practices in real time also helped to explain practices and the “taken for granted meanings and assumptions” that make boundary-spanning possible (Feldman, 1995, p. 2). Naturalistic observation allowed me to witness boundary practices from inside the process. For example, interactions between ELA and NC leaders, or ELA and the Mayor’s Office and capture data that revealed the complexities and nuances of those situations. This was especially important because the bridging of different perspectives occurred in these contexts. To the extent that ELA mediated between differing

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13 NC Congress, City Hall
14 Four, including two LANCC meetings (South Los Angeles CSC, Department of Water and Power Headquarters), SLAANC meeting (Community Health Councils), DWP Oversight (DWP Headquarters)
15 Three, including City Council meeting, City Council Rules Committee Meeting, NC Grievance Panel Meeting
perspectives of Neighborhood Councils and City bureaucracy, or grassroots direct democracy and elite-focused traditional electoral democracy, these are the interactions where discussions, debates, and outright conflicts between different ways of knowing played out.

I recorded field notes on both a notepad and a computer and then coded my observations of practice details. These details included how meetings were organized differently among different groups, what were the temporal order of activities, who were the main actors involved in different activities, among others. Observational data thus complemented the key-informant interviews and added texture to reported practices. This texture helped me to interpret the taken for granted meanings behind how ELA engages in boundary practices and helped me to identify the assumptions ELA makes about its role, the Neighborhood Council system, and how they interact with the principles of strong democracy.

Archival Review.

Another data collection method was archival review. To gather additional information about ELA boundary practices and ELA history, I collected archival records relevant to the governance and implementation of the NC system. Unfortunately, a systems failure caused the destruction of the ELA server and thus the loss of ELA’s internal records. As a result, my archival review was limited to recent ELA documentation, as well as publicly available documents housed online or stored with the City Archives in hard-copy. Thus, I conducted my archival review online or at the City Archives in downtown Los Angeles.

Archival data included meeting agendas and minutes for ELA, BONC, City departments, City Council, and some NCs. Records also included formal planning documents, program evaluations, reports detailing the sort of activities NCs engage in, how NCs spend the funds they are
appropriated, how many Community Impact Statements NCs submit and on what topics, ELA and NC strategic plans, memoranda, and formal communication among these groups. Finally, archival data also included media coverage relevant to NC activities, including articles in local newspapers and in CityWatch, an online blog with a particular focus on NCs and a sizable NC participation among contributors and readership.

Archival sources supplemented interviews and observations to help establish ELA’s patterned practices, and also illustrated one of the primary types of interactions between ELA, the NCs, the City, and public stakeholders. I focused on archival records that could provide insight into both NC system practices and ELA-specific practices.

Table 5 - Archival review of practices

<table>
<thead>
<tr>
<th>NC system practices</th>
<th>ELA practices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategic planning practices</td>
<td>Internal procedures and policies</td>
</tr>
<tr>
<td>Decision-making practices</td>
<td>Evolution in procedures and policies</td>
</tr>
<tr>
<td>Legislative practices</td>
<td></td>
</tr>
<tr>
<td>Descriptions of interactions</td>
<td></td>
</tr>
<tr>
<td>Organizational workflow</td>
<td></td>
</tr>
<tr>
<td>Descriptions of political and environmental context</td>
<td></td>
</tr>
</tbody>
</table>

Not only did archival documents describe organizational practices, but they also guided these practices by inscribing laws, policies and organizational priorities. Examining changes in how these documents guided practices illuminated how ELA has evolved over time. I began my review of ELA organizational documents with charter reform documents and Neighborhood Council plans. Based on the archival, observational, and interview data, I identified additional archives for additional focused review.
Analysis

To analyze ELA’s boundary practices, I used coding, memoing, constant comparison, and theoretical sampling (Corbin & Strauss, 2008, Emerson et al., 2011, Glaser & Strauss, 2008). Coding involves the categorization of short segments of interview transcripts and field notes by connecting words and phrases to specific analytic dimensions and categories (Emerson et al., 1995). I assigned codes to interview and field note excerpts in a way that reflected their meaning. I collected data in multiple forms, including digital interview transcripts, pdf documents, paper documents, and handwritten field notes. All of my interview transcripts as well as digitized archival documents, and some field notes were uploaded to my atlas.ti database, a total of 317 primary documents. I used atlas.ti, a data management software, to organize my data into broad categories of concepts, and to serve as my “codebook.”

My codes coalesced into three thematic categories: policy, process, and governance. The following findings chapters present how these themes illuminate boundary dynamics between the City and NCs, examine ELA boundary practices, and describe the evolution of practices over time.

Figure 5 - Governance entities traversing three boundaries
I also conducted a content analysis of archival documents, using a spiral or iterative approach (Hesse-Biber & Leavy, 2010). I began building my codebook on based on themes and patterns in interview responses, and then re-examined archival documents, including Charter reform documents, governing documents, ELA best practice documents, City Attorney Opinion documents, NC Review Commission findings, ELA General Manager Newsletters, CityWatch posts, Los Angeles media coverage, and various public meeting agendas and minutes. This on-going secondary analysis allowed for closer examination of issues and events referenced in interviews. Content analysis also revealed instances where the wording in formal documents itself was the subject of debate, and how these debates held critical implications for NC system implementation and operation. Ultimately, content analysis facilitated the further refinement of codes and the development of a more thorough and accurate understanding of the studied phenomena.

My interviews alone produced 4165 quotations and more than 6000 codes, which were then organized into analytic hierarchies. I conducted multiple phases of coding to establish a coherent set of codes, eliminate duplicates, and begin to pin point relevant analytic categories. When coding, I relied on my experience with the data, the data collection process, as well as theory regarding democracy concepts based on the literature. “Role definition,” “dysfunction,” and “subversion” were all concepts that emerged from the research process, and led to codes. In contrast, “boundary practices” and “reciprocal accountability” were concepts I drew from the organizational management and participatory democracy literature, and led to additional code trees. First, I established primary codes, such as “city government dynamics” or “NC role,” and second, as broad categories began to take shape, I created sub-codes. This process ultimately yielded three levels of coding, for instance “city government dynamics: power (city council)”
identifies a data segment that describes City Council as a type of power, which is a dynamic of City government in LA. Similarly, “NC role: balance stakeholder voices (interest)” identifies a data segment that describes how interests are some of the stakeholder voices balanced as part of the NC role. Some quotations, or data segments, were assigned multiple codes.

Throughout the research process, patterns and themes that described boundary practices – actions, events, language, types of interactions, physical environment -- emerged in the coding. I attempted to identify what contextualized meaning was being expressed and built a model that explained how ELA engaged in boundary practices. Through close examination of field notes and interview transcripts, patterns and themes emerged revealing connections between boundary practices, roles and other concepts (Emerson et al., 1995; Miles & Huberman, 1994). Furthermore, conflicting accounts or contrasting codes for the same actions and events emerged, which not only served to highlight boundary interactions but helped me uncover previously hidden value systems and structures that comprise the boundaries themselves (Roth & Mehta, 2002). These instances also highlighted misunderstandings and fundamental philosophical disagreements among stakeholders, the crux of my study of boundaries and the primary focus of this analysis.

As I coded, I wrote short memos to catalogue my own specific thoughts and observations about coded field notes. I also wrote memos immediately following interviews to document nuances expressed in ideas or to explain more thoroughly the words or thoughts expressed in the interview. Memos allowed me to elaborate on how I made coding decisions and keep track of the cumulative and complex ideas that emerged and evolved over the course of the study (Corbin & Strauss, 2008). Memos also allowed me to describe relationships between coded field notes of discrete observations to provide a more sustained examination of a theme or pattern (Emerson et
al., 1995). Furthermore, memos helped me identify themes that cut across different categories, revealing unforeseen conceptual dimensions (Emerson et al., 1995).

I used constant comparison throughout the data collection and analysis processes to continuously compare events, behaviors, and responses to identify concepts, patterns and themes in the data (Glaser & Strauss, 2008). As concepts and themes emerged through constant comparison, I tailored my data collection to fill in gaps and pursue patterns in the data towards theory development (Glaser & Strauss, 2008). I used theoretical sampling by collecting, coding and analyzing data while concurrently deciding what data to collect next -- and where to find it -- to develop my theory as it emerged. Theoretical sampling complimented constant comparison and allowed me to target data collection towards activities and informants with the greatest emerging relevance to the study. This analytical sampling process allowed me to minimize gaps in the theory and maximize theoretical saturation (Glaser & Strauss, 2008).

**Ethical Considerations**

Given the potential political vulnerability of informants, this study was conducted with the utmost regard for participant confidentiality. Nearly all participants had some vulnerability to retaliation, whether from City leaders, NC participants, or from ELA management. The study was governed by an Internal Review Board Human Subjects Research protocol, approved in November 2015, which ensured ethical interactions with research participants and ethical administration of their data. The IRB reviewed and approved my proposed topic, methodology, specific outreach and data collection procedures, informed consent and confidentiality protocols, as well as potential risks to participants and benefits of the research.
I sought informants discreetly and conducted the interviews themselves in private settings. I received verbal informed consent from all informants who participated in the interviews. A substantial number of informants did not consent to attribution and preferred instead to keep any direct quotes anonymous. Others signed consent forms for their interviews to be quoted. To ensure confidentiality, I assigned pseudonyms for all informants and exclusively used the pseudonyms throughout the transcription, analysis and writing processes. For informants who consented to attribution, I identified them at the end of the writing process; for informants who did not consent to attribution, I made their quotes anonymous by identifying them only by stakeholder category.

I conducted most of my observations in public access settings, such as public meetings. In these spaces, informed consent was not required. I also conducted observations within ELA internal settings. I received permission from the General Manager of ELA to observe ELA departmental activities, and was occasionally invited by the GM and other staff to attend meetings outside the department. The GM also introduced me at a staff meeting, and gave me the opportunity to explain the nature of my research and inform the staff that I would be observing departmental activities.

The archival records I accessed are all public record, including official documentation of charter reform proceedings, official NC, ELA, BONC, Mayoral or City Council actions as well as archival media coverage. The only non-public documents I included were notes taken by study participants for personal use, which were then provided to me by their authors with permission to use them.
Validity

Maintaining analytic validity and data reliability was essential to this research process. The principal validity measures for this study were accuracy, faithfulness, and generalizability (Lin, 1998). A potentially broad range of abilities among study participants to reflect upon and articulate alternatively abstract and concrete ideas in an interview setting could potentially compromise content validity (Frankfort-Nachmias & Nachmias, 2008). To mitigate these concerns, I used probes to encourage more descriptive responses during interviews. I followed up with key informants periodically throughout the analysis process to ensure that my descriptions and interpretations accurately and faithfully reflected the conceptualizations and logics embedded in their ways of knowing. As an interpretive study, it was essential that I faithfully capture the subjective knowledge and assumptions to ensure the validity of my data analysis.

In addition, I engaged in traditional data triangulation and used multiple sources of data, including multiple informants on the same topics, to give greater credibility to how events unfolded (Roth & Mehta, 2002). I also used interpretive triangulation, which weighs data provided by individuals against knowledge of the informants’ worldview or value system and how those might affect informants’ interpretations (Roth & Mehta, 2002). Thus, I accounted for how an NC member’s perspective might shape his or her account of ELA’s role compared to an ELA staff member, or a City staffer. I used my sources of data to triangulate converging lines of inquiry and to corroborate facts and phenomena within my data (Yin, 2014).

My own interpretive lens also served as an important analytic tool. I have worked in local policy circles for over a decade and am familiar with many of the events, participants, and dynamics that were at the center of this study. Furthermore, I have worked in a variety of roles...
within this system, including community advocate, Neighborhood Council participant, community-based researcher, and policy analyst. I have also worked in close collaboration with elected officials. Each of these roles has provided me with a baseline competency with the different types of participants involved in this study and an appreciation for their worldviews. Despite this background, as a researcher with explicit research objectives, I brought my own biases into the analysis. However, by encouraging informants to tell their stories, and to listen, probe, and follow where informants wanted to go, I attempted to reduce how much I influenced the responses of my informants. Furthermore, I kept notes to document my interpretive reactions in real time, and to maintain distance between my own interpretations and the raw data provided by my informants.

I adhered to the aforementioned validity measures to establish analytic generalizability. Due to the highly specific practices and unique structures analyzed in this study, the findings and the mechanisms they describe may differ from those observed among other groups in different contexts. Faithfully and accurately describing phenomena and reliably documenting the research process, including my own interpretive decision-making, helped to establish theory with potential application in other analogous settings (Yin, 2014). Thus, as I will later discuss, the findings may have general implications or provide specific recommendations to a broad array of groups that function as boundary spanning organizations which may share some theoretical dimension of boundary work or sense-making.

**Limitations**

I encountered several limitations throughout the process of this study. First, the scope of the NC system is enormous, with 96 councils, more than 1800 elected board members, and thousands of meetings annually. This forced me to focus my research on ELA specifically, and
continually refocus as my findings extended both in depth and breadth. Furthermore, Los Angeles has a unique and complex city power structure. Finding informants who could speak with authority, or even accuracy, on the intricacies of city governance structures was a challenge initially. Part of this reflects the contest between Mayor and City Council, and to a lesser extent NCs, for power within the City. While informants could speak about their own experiences, most had varying degrees of understanding about the structure and purpose of the NC system itself, or the roles of the other actors in the system. Fortunately, the extent to which informant information was inaccurate or contradicted by others, such as NC perceptions of ELA practices or city perceptions of NC practices, helped me to identify boundary problems.

In addition, NCs are political minefields. Many city leaders see NCs as inarticulate and unhelpful opposition to the City’s administrative and political agenda, and an insultingly unqualified substitute for the political class. They also acknowledge the personal political risk that accompanies publicly criticizing NCs. Many NC leaders, on the other hand, see themselves as playing an important role in challenging the entrenched interests within the City. They similarly acknowledge that pushing too hard or too angrily results in political retaliation from the City. Although eliminating the NC system seems unlikely, the contentious nature of the relationship between the NCs and the city leaders and their abilities to mutually hurt each other politically, meant that the topic of NCs typically elicited a strong response from informants, and the extreme political nature of the subject contextualized the conversations. In response, I adopted and presented a neutral position in my investigation and attempted to allay the confidentiality concerns among my informants.
Finally, several political crises occurred during my research process that may have impacted stakeholder and informant perspectives on the NC system, as well as the availability and willingness of some informants to participate. A long-fraught relationship between several San Fernando Valley NCs and the office of Councilmember Felipe Fuentes exploded into open conflict, including the cancellation of the NCs’ long-standing office lease in a City building\(^{16}\) and a recall petition against the Councilmember. Ultimately, the Councilmember announced his intention not to run for re-election, though for reasons seemingly unrelated to the conflict with local NCs.

During this time, affected NC leaders stridently advocated for the rights of NCs to have access to City office space and repeatedly brought the issue, and thus the conflict, before BONC and City Council. Another political crisis occurred when a particular Neighborhood Council in the Valley had major problems with its elections. Although the problems seemed to be the result of a confluence of factors, including online registration and voting implementation problems, convoluted bylaws requirements, elections staffing, and individual personalities, the problems were so pronounced that the local City Councilperson weighed in on his displeasure with the online and electronic voting platforms. While these political crises were modest, they demonstrated the political contentiousness associated with NCs and may have affected my access to prospective informants and contextualized the responses of others.

\(^{16}\) Accounts differ on whether this was a deliberate hostile act against NCs or just normal business.
Findings: Historical Context of Charter Reform, Neighborhood Councils and ELA

If it’s you know, so... again like a child that was raised in chaos, somehow ended up getting a scholarship to college and is doing pretty well. Is it the most desirable infancy? Well consider this, if it wasn’t for the conflict at City Hall, the Neighborhood Councils would have never been created. So that’s where it’s different from the parenting model, which is... they were only created to solve a problem that was in everybody’s face. (Charter Reform Participant - ss05)

Purpose

This chapter presents the historical context in which the Neighborhood Council system was forged, explains the political and governance dynamics present during Charter reform and in the ELA’s creation, and describes the process by which the Neighborhood Council system was designed. Furthermore, we describe the formal role of ELA as outlined in the Charter and Plan for a System of Neighborhood Councils, as well as the variety of roles ascribed to ELA by different stakeholders. The findings of this chapter have been synthesized from a variety of reference material, including the cited historical secondary sources, archival public records, media coverage, formal interviews, and informal conversations with individuals who have familiarity with these events.

LA in the 90s

Los Angeles in the early 1990s was a city in turmoil. A combination of widespread dissatisfaction with differential access to City government and an array of systemic injustices, including inequitable city service distribution, neighborhood red-lining, neighborhood disinvestment, and police brutality led to an acute crisis of confidence. The civil unrest following
the Rodney King trial verdict\textsuperscript{17} and the killing of Latasha Harlans\textsuperscript{18} is well documented. These events not only illuminated deep racial divisions in the city, but also released of years of pent up anger at discriminatory practices by the city. These disparities in access to city services, such as police protection, were effectively demonstrated when violence broke out in South Central Los Angeles (Former City Councilmember - 08cs).

At the same time, communities in the San Fernando Valley, the Harbor and other areas were themselves deeply dissatisfied with their place in the city. Outlying neighborhoods, particularly among the more conservative and affluent areas of the northwest San Fernando Valley, complained about poor levels of city services. This dissatisfaction also targeted the city’s plodding bureaucracy and civil service workforce as incompatible with their more conservative preferences for small, efficient government (Sonenshein, 2013). These neighborhoods felt that trash collection, street services, water and power rates, and land use planning processes were not provided at a level commensurate with the amount of taxes they were paying to the city. Furthermore, they felt that the downtown-based city government was unresponsive, and prioritized the interests of downtown Los Angeles over the specific needs of their own distant communities. Calls to secede had been simmering for decades, built on these longstanding governance concerns as well as the steady encroachment of Latino immigrants in a longstanding White majority suburb. The passage of Assembly Bill 62 in 1997 made secession suddenly much


more viable. Soon thereafter, an energetic secession movement materialized, threatening to break off approximately 40% of the city of Los Angeles (Sonenshein, 2013).

With civic alienation at a crisis level and the city on the verge of fracture, city leaders ultimately looked to re-write the city’s governing Charter for the first time since 1925. Los Angeles Charter reform served as the arena in which numerous political battles were fought. Some Charter reformers saw the crisis as a mandate to “strengthen” democracy by diffusing the power of elected officials, enhancing participatory and inclusive structures, and bringing dissatisfied communities back into the fold. Others saw it as an opportunity to consolidate the power of their own offices, and reduce dependency on unresponsive bureaucratic processes. This tension between consolidating and diffusing power provides the backdrop for the creation of the Neighborhood Council system, and contextualizes the evolution of the Department of Neighborhood Empowerment.

Charter Reform

LA Government Structure.

In the years leading up to the 1920s, Los Angeles struggled with political corruption, and the patronage of powerful economic actors, such as the railroads and the harbor among others, pressured bosses of the partisan machines to hire party workers to support their interests. In an effort to combat corruption, and also to professionalize and de-politicize the municipal workforce, Los Angeles embraced a new public management approach to governance. The 1922 Charter created commission-based departmental oversight and a civil service workforce (Ingram, 2008). These changes were meant to insulate departments from the political patronage of machine

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politics and the interference of elected officials in day-to-day provision of city services. Since that time, commissions have either managed or advised nearly all of the City’s departments and some freestanding commissions conduct work of their own. Depending on the department, General Managers answer to their governing commission or to the City Council or to the Mayor, or to a combination of the three. General Managers oversee departments staffed mostly by career city workers who are most often members of the city employees union. This dynamic has allowed for the professionalization of the civil service, the development of processes to assure accountability, and day-to-day autonomy for city departments to provide services.

In some ways, these changes were successful at insulating city staff from pernicious political hiring and firing practices, which were prevalent in every department from Public Works to Police. The commission and civil service structures also allowed the City to develop career city staffers, who were able to gain experience and develop expertise in their various fields. Finally, the centralized bureaucracy also allowed the city to plan city services at scale. However, in other ways, the civil service did not function in the best interests of City stakeholders. The price of expanding the bureaucracy was that establishment of a deliberate and uniform process became paramount, with customer service and service outcomes declining in priority. Additionally, until the Christopher Commission reforms of 1992, civil service protections included leadership classifications in city departments. As a result, the openly racist poster child for police brutality, Daryl Gates, could not be fired by the City’s elected leaders and was able to remain police chief despite years of criticism.

I remember watching the news coverage, and I’m listening to [...] some commenter explain “well, the mayor just can’t he can’t fire the head of the police force.” And I remember
thinking “what??” [...] haha it’s like, how could there be such a system? Who would think of such a system? (Charter Reform Participant - 09ss)

The only way to be a general manager then was you had to start as a civil servant and work your way up! And the only way to be chief of police, you had to be LAPD and work your way up! And that’s why you had a civil service property, you had a property right to your job in civil service. And that had to go! Ok, so Charter, the Charter F solved that. (Charter Reform Participant 09SS)

The process orientation of the civil service and commission-based city government created a management challenge for the city’s leadership. Most large cities are run by a combination of executive and legislative bodies, the Mayor and the City Council. In the strong Mayor system, the mayor is the chief executive, creates the city budget, appoints department heads and other citywide officials, and enacts policy unilaterally within the purview of existing legislation. In a strong Council system, the City Council collectively oversees a city manager, who functions as the city executive. In this system, the City Council creates policy through legislation and collectively selects department heads, who are then supervised by the City Manager (Mullin et al., 2004). Strong council/city manager systems are more frequently seen in smaller cities, where council districts are small enough for constituent/Councilperson interaction, and the City Council body itself is small enough to function as a board. Los Angeles, however, does not fit within either of these paradigms.

Until the recent Charter reform of the 1990s, when some executive power shifted from City Council to the Mayor, Los Angeles could be classified as having a strong Council system. Unlike other strong Council systems, there is no City Manager because Los Angeles has had a Mayor. Instead, the City Council has had broad legislative and administrative powers, including: legislating, passing the city budget, and playing a major role in selecting managers for city departments. Despite the fact that the Mayor ostensibly had the power to appoint commissioners and
department heads, as of 1991, the City Council gave itself a ratification power and de facto control over leadership appointments and removals (Sonenshein, 2013). Additionally, the City Council had not increased in size from 15 members since the Old Charter was ratified in 1925, when the population of Los Angeles was one quarter of its current size of 3.6 million. Additionally, in 1925 Los Angeles was an emerging and growth-oriented proto-metropolis, and “the city’s residents were mostly white and middle-class, with visions and values that showed comparatively little variation, particularly with respect to those in positions of power.” (Parlow & Keane, 2002) 90 years later, each City Council person had a district constituency resembling that of a mayor of a major city, nearly 230,000 people; the individual Los Angeles council districts would be in the top 75 largest cities in the United States and would be in the top 15 largest cities in California.

A 15-person council for a city the size of Los Angeles is uncommon. In fact, most other large cities feature strong mayor governance structures and have a considerably weaker council: Chicago’s City Council is comprised of 50 Aldermen; New York has 50 City Council districts. The size of council districts has a direct impact on the quality of representation. Over the years, constituents had complained about the accessibility of their Councilperson. Both the size of the districts in population and area and their distance from City Hall in downtown Los Angeles created barriers to local stakeholders’ ability to access their representatives. This distance, along with new and sometimes unwelcome real estate development across the city, fueled speculation that members of the City Council were more easily influenced by special interests when their constituents were unable to effectively hold them accountable. Add to this LA’s slow moving bureaucracy, and district constituents became frustrated by how their city was governed.

[Learning] the day-to-day work that goes into you know enacting something new and change-making is really... massive and impressive and the people doing it are so
unbelievable. So like to get to be really involved in that, inside the building, and watching how it goes and also understanding why it frustrates people that aren’t involved in it. For good reasons, you know, there’s probably no way around the fact that it’s gonna frustrate them because the process of making change in government is... damn near mind-numbing. Glacial, absolutely. So to learn it, to understand it but also to like... to strip away the cynicism. (City staffer/former NC board member - cs05)

By the time Richard Riordan was elected Mayor in 1993, the combination of frustration with a plodding bureaucracy, concerns about political corruption, civil unrest, and an energetic secession movement had reached a fever pitch.

**Charter Reform Process.**

The ensuing turmoil prompted Riordan to take action to reform the city’s governing Charter by invoking rarely-used statute, California Government Code Ch 2. § 34452(a), and in 1996 he sponsored and personally financed a ballot initiative to form a Charter reform commission. Riordan shared many of the popular frustrations with the way the city was governed and, when elected as Mayor in 1993, he sought to streamline the city bureaucracy, address the concerns of the San Fernando Valley, and forestall the threat posed by secession. Riordan, a business executive who was unimpressed by how the City was managed, also sought to empower the Mayor’s office. His Charter reform proposition was presented as a political outsider’s effort to disentangle the city bureaucracy and spit in the eye of the do-nothing politicians on City Council (Sonenshein, 2013). Voter dissatisfaction with city management and distrust of politicians translated into overwhelming popular support for Charter reform, especially because the recommendations of his Charter commission would go directly before the voters with no City Council interference. Not to be outmaneuvered, the City Council formed its own Charter commission to address the concerns of dissatisfied constituents and prevent what they considered
and frivolous power-grab by someone with limited understanding of the intricacies of city government. By the summer of 1997, there were two parallel Charter reform commissions operating at odds.

The Mayor’s Charter commission featured commissioners elected by the public and became known as the “elected commission.” Because it involved an open election, the commission was comprised of individuals prominent Los Angeles politics, including in particular former elected officials and labor leaders. Erwin Chemerinski, a noted constitutional scholar and celebrity legal analyst after the trial of O.J. Simpson, chaired the elected commission. The elected commission had limited staff support, in part because its budget was appropriated through City Council. It relied on the commissioners themselves engaging in discussions of democratic and political theory to create parameters for a new Charter. The City Council’s Charter commission, on the other hand, was comprised of commissioners appointed by the City Council. Unlike the elected commission, the “appointed commission” was fully staffed. Led by Dr. Raphael Sonenshein, a Los Angeles political analyst and long-time city staffer under Mayor Bradley, the appointed commission’s work was organized around data-driven reforms and relied heavily on the policy reports of its team of professional analysts. Finally, in addition to the different selection processes, staffing schemes, and processes of each of the commissions, the scope of work differed sharply. Whereas the appointed commission sought to make modest changes to the existing Charter and bring the document “up-to-date,” the elected commission sought to draft a new Charter completely from scratch.

The hostility between the Mayor and City Council inside City Hall carried over into the work of the Charter commissions. With the ugly politics of the Charter reform effort taking place in full
view of the public, it became apparent that without some sort of truce, Charter reform would fail and restore the frightening prospect of secession. The commissions each had elements they wanted to see in the new Charter, but neither commission was on particularly strong political footing. The appointed commission lacked legitimacy in the eyes of the public due to its appointment of commissioners as apparent council proxies. The elected commission, thanks to the voters, was comprised of commissioners from a slate of labor-supported candidates, and therefore no longer strongly aligned with the reform goals of the mayor. This concern compelled the commissions to work together in an attempt to forge a compromise.

Both commissions wanted to see secession put to rest, and appeasing secessionists offered an opportunity to claim a large contingent of support for their political agendas moving forward. The elected commission’s priority was to return administrative powers to the Mayor’s office. The appointed commission’s priority was to “play defense” (Charter Reform Participant - 09ss), preserve the City Council’s power as much as possible, and prevent new actors from entering the policymaking process.

We decentralized the City Planning Commissions, the five Area Commissions […] it’s really interesting that the city fathers and mothers, particularly within this community, are the most undemocratic people. They do not want public input, they want to get stuff as soon as possible, write a check, get my thing approved, your project[s] approved and keep moving. But we were mucking up the works. (Charter Reform Participant - 09ss)

The city populace found that supporting the mayor’s objectives could help loosen the grip of an overly powerful City Council and support their efforts for more power diffused into the neighborhoods. “And from the mayor’s standpoint, […] the drive for neighborhood representation could help drive his power for greater mayoral authority” (Charter reform participant - ss05). The City Council similarly saw the superficial diffusion of power into the neighborhoods as a means to
appease voters and undercut the mayor’s solicitations. As the Charter reform process wore on, and political battles played out in local headlines, Charter reformers on both commissions came to realize that tepid political engagement and general disgust with the political class would more likely doom both Charter proposals than raise one at the expense of the other. As a result, the commissions began to work together to craft a “Unified Charter,” a compromise document that would deliver some victories to each camp, and which both the City Council and the mayor would ultimately endorse.

At this point, Neighborhood Councils, a concept prototyped by Councilman Mark Ridley-Thomas’s 9th District Empowerment Congress and proposed as a citywide system during Councilman Joel Wachs’s unsuccessful 1993 Mayoral campaign, entered the Charter reform conversation. Neighborhood Councils were not proposed as an earnest effort to diffuse policymaking power to the neighborhoods, but as a political football with which to claim public support for ulterior Charter reform priorities. As such, both commissions expended considerable energy in designing a Neighborhood Council system and it soon became a proxy battleground for the conflict between City Council and the mayor. “Out of all that, I’m happy to say emerged this baby that had very odd parents, few of whom actually wanted this to happen” (Charter Reform Participant – 05ss). Despite their secondary priority for both commissions, the Neighborhood Councils quickly became a signature initiative of Charter reform, and probably the feature most closely associated with Charter reform for those outside City Hall.
Neighborhood Council System

Designing the Neighborhood Council System.

In the face of the City’s governance challenges and the need to restore civic trust, city leaders began to support the idea of increased community participation in government, and ultimately made it an objective of the Charter reform process. Building on a national movement towards community-based governing bodies (Berry et al., 1993), Councilman Wachs and his chief of staff, Greg Nelson, pushed for a citywide system of Neighborhood Councils (NCs): city-certified groups of local stakeholders to advise the government on issues of concern to the neighborhood and whose purpose would be to promote civic engagement and improve government responsiveness to local issues (Los Angeles City Charter, 1999). Nelson personally facilitated the design process between the two commissions, arbitrating disagreements on the purpose of the NC system, the role NCs should play, how NCs should function, and what powers NCs should have. Ultimately, reformers settled on a citywide system of city certified bodies that would meet regularly to discuss issues of local interest, foster local community participation in policy discussions, and enhance government responsiveness to local concerns. However, even within these parameters, questions regarding the structure, powers, and participants of the system remained. The way the Charter reformers answered these questions – or left them unanswered – continue to define the character of the system.

To promote more citizen participation in government and make government more responsive to local needs, a citywide system of Neighborhood Councils, and a Department of Neighborhood Empowerment is created. Neighborhood Councils shall include representatives of the many diverse interests in communities and shall have an advisory role on issues of concern to the neighborhood. (Charter Article IX, 900)

Neighborhood Councils are city-certified local groups made up of people who live, work, own property or have some other connection to a neighborhood. Neighborhood Council
Board Members are elected or selected to their positions by the neighborhoods themselves.20

City leaders were drawn to the Neighborhood Council model as a means to enhance civic engagement and government responsiveness for two principal reasons. First, by creating additional mechanisms for meaningful participation over time, Neighborhood Councils offered a way for citizens to feel less alienated by the city government (Musso et al., 2006; Arnstein, 1969; Krimsky, 1982). Second, NCs would provide instrumental ways for Los Angeles to collect and use local knowledge and allow for better understanding of local policy issues and better crafted interventions (Musso et al., 2007; Musso et al., 2011; Berry et al., 1993). For the most optimistic Charter reformers, NCs offered to strengthen both the legitimacy and efficacy of city governance. However, adding a new layer of participatory governance does not necessarily confer these benefits, and the less enthusiastic Charter reformers remained skeptical of the pragmatic benefits promised by NCs. For engagement to be legitimate or effective, it must be connected to government decisions. Thus, some on the elected commission wanted NCs to have a decision-making role in government while others, particularly those on the appointed commission, did not.

The status of NCs as either “advisory” or “decision-making” became central to the discussion defining the role of NCs in the city governance scheme. Proponents for “empowered” NCs argued from a principled standpoint that “democracy is messy” but described the messiness as a side effect of self-government and self-determination. Opponents expressed their skepticism pragmatically, and focused on who the likely participants would be.

Are they advisory or are they decision-making? It was a pretty silly debate, I thought, because what does that really mean? Did that mean that those people who hated City Hall the most and wanted to decentralize government the most, wanted the Neighborhood

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20 http://empowerla.org/about-neighborhood-councils/
Council to make decisions vis-à-vis zoning and land use? Did they really want that? And that would be the final decision? (Charter Reform Participant - ss09)

Another aspect of the NCs that was debated during the commission hearings was how structured they would be within the city system. The existing templates from other cities suggested a spectrum from unstructured non-profit organizations to highly structured city entities. This conversation overlapped with consideration of what NCs should do. Under the general heading of promoting citizen participation and enhancing government responsiveness, some reformers envisioned block clubs or homeowner associations, some envisioned professionalized advocacy groups, some envisioned a new layer of elected officials in city government, and others saw it as a trough to ensnare and distract gadflies. These different types of organizations each engaged in different types of activities, maintained different types of relationships with the city system, and required different types of organizational structures. Some reformers envisioned a system where individual NCs could decide for themselves what sort of activities they wanted to engage in and what type of organization they wanted to be. Greg Nelson argued the whole point of creating NCs was to empower neighborhoods, and that having Charter reformers make these decisions would undermine the NCs’ self-determination, a key aspect of this effort.

In empowering Neighborhood Councils to pick their own leaders, decide how they’re gonna run themselves, that begins to irritate a lot of people who are marginal OCD […] I know in past years there’s been discussions about “well, we need one set of bylaws for all the Neighborhood Councils.” And I go “no, what part of empowerment don’t you understand?” […] You know… if there was one perfect way of doing things, we’d probably do it that way. But the whole idea of the Neighborhood Council system is not to believe that there’s some bureaucrat in City Hall who can figure out the best way to pick officers, or who those officers should be. (Charter Reform Participant - 07ss)

They spent a ton of time and then partly because some of the activist who help design the program […] thought it was absolutely important that they have maximum autonomy. So here’s what you had, you had Neighborhood Councils thinking they should have maximum autonomy and a City Attorney and a City government coming down with the iron hand of
bureaucracy on them. Which meant they were a) gonna be frustrated and b) they weren’t gonna be able to do what they wanted to do anyway. (Charter Reform Participant 05ss)

Some aspects of the NC system that were intentionally left to NC self-determination include who would comprise neighborhood stakeholders (those who live, work, or have some otherwise abiding connection to the area), how NC boards would be selected (election, appointment, some combination), how NC boards would represent their districts (geographically, by interest group), and how bylaws would be written.

As the Elected and Appointed commissions were hammering out the details of the NC system in the “Unified Charter,” the City Attorney became involved in the debate and ruled that the NCs were to function like city commissions. Therefore, NCs would be subject to the Brown Act, a stringent public notification process, and required to adhere to highly structured city processes for discussing, managing, and dispersing city funds. Eventually, the Charter reformers adopted both Greg Nelson’s vision and the City Attorney opinion, and defined NCs as highly structured city entities with a broad and ill-defined role and scope of work.

Department of Neighborhood Empowerment.

Voters approved the Unified Charter in 1999 and the NC system was underway by 2000. The new Charter created the Department of Neighborhood Empowerment (ELA) to organize, certify, and support NCs, and to manage the NC system. In many ways, ELA was created as an afterthought, the means of implementing the highly touted NC system. Therefore, ELA was created with the goals of the NC system in mind – increasing participation and enhancing responsiveness – with less consideration given to how it would function as a department. In this
way, much like the NCs themselves, the ELA’s mandate was broad even while it operated within a highly structured city bureaucracy. The mission and duties of ELA, as defined in the Charter, are:

Table 6 - Mission, duties of ELA

<table>
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<tr>
<th>The Department of Neighborhood Empowerment shall have the duties and responsibilities set forth in this Article and elsewhere in the Charter to implement and oversee the ordinances and regulations creating the system of Neighborhood Councils enacted pursuant to Section 905. Duties and responsibilities shall include:</th>
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<tr>
<td>Prepare a plan for the creation of a system of Neighborhood Councils to ensure that every part of the City is within the boundary of a Neighborhood Council, and has an opportunity to form a Neighborhood Council (Plan);</td>
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<tr>
<td>Assist neighborhoods in preparing petitions for recognition or certification, identifying boundaries that do not divide communities, and organizing themselves, in accordance with the Plan;</td>
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<tr>
<td>Arrange Congress of Neighborhood meetings if requested to do so by recognized Neighborhood Councils;</td>
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<tr>
<td>Assist Neighborhood Councils with the election or selection of their officers;</td>
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<td>Arrange training for Neighborhood Councils officers and staff;</td>
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<tr>
<td>Assist Neighborhood Councils to share resources, including offices, equipment, and other forms of support for them to communicate with constituents, other Neighborhood Councils and with government officials; and</td>
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<tr>
<td>Perform other duties as provided by ordinance.</td>
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Apart from organizing certifications and hosting the Congress of Neighborhoods, the tasks charged to ELA are unspecific. Vague terms such as support, help, assist, and facilitate are used throughout the ordinance establishing ELA. The broad categories of work taken on by ELA over the years has generally fallen under: NC field support, NC certification, NC training, NC funding administration, NC elections management, and general build out of NC administrative support. ELA also facilitates the Board of Neighborhood Commissioners (BONC), the advisory commission attached to ELA that serves as a venue for NC and public input into ELA operations and NC system

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21 Los Angeles City Charter, Ch. IX, Art. 901
In this way, ELA’s work is dependent on and driven by to the needs and priorities of the NCs.

However, as a city department, ELA also must address the policy priorities laid out by the city’s elected leadership. The GM of ELA serves at the pleasure of the mayor, and the department’s annual budget must be approved by City Council. Elected officials change over time, and thus ELA’s work priorities may adapt in response. Ultimately, ELA’s work depends on external interpretations of its role including changing political pressures, financial crises and accompanying budget cuts, as well as the evolving capacity and needs of NCs.

Department of Neighborhood Empowerment Roles

Formally Defined Role.

The role of the Department of Neighborhood Empowerment (ELA) is formally defined in two places: the City Charter, and the City Administrative Code. Article IX, Section 900 of the Charter, which lays the groundwork for the creation of the Neighborhood Council system, defines the shared purpose of the citywide system of Neighborhood Councils and ELA as: to promote more citizen participation in government and to make the government more responsive to local needs (Art. IX, § 900). The Charter further specifies ELA’s duties as: prepare a plan to establish the system of NCs, assist NCs in becoming certified, arrange a “Congress of Neighborhoods,” assist NCs to elect or select their officers, provide training to NC board officers, facilitate collaborative efforts among NCs and between NCs and city entities, and field other unspecified duties as assigned by ordinance (Art. IX, § 900).

The Administrative Code lays out numerous additional duties. The first responsibility is a notable addition: “ELA shall implement and oversee compliance with City ordinances and
regulations” (Los Angeles Administrative Code, § 1.22.28). Additional duties include: training city officials, including elected officials and commissioners, on community empowerment; establishing a citywide database of neighborhood organizations; coordinating relationships between advisory committees and NCs; and ensuring that NCs have enough notification and data on issues of interest to foster meaningful participation. All told, the Administrative Code outlines 14 distinct principal duties and responsibilities for ELA, plus numerous additional specific tasks in the NC Plan (Appendices B and C). Some, such as “establish and manage the Early Notification System,” are highly specific and some, such as “ensure... meaningful participation” or “oversee compliance with city ordinances and regulations,” are expansive in their vagueness. Additionally, some of these duties depend upon the cooperation of others. For instance, training city elected officials on civic engagement requires that city elected officials want to be trained. This combination of specificity and vagueness opens to door to a potentially sprawling work plan. Moreover, it does not account for relevant power dynamics in city operations, while leaving ELA’s specific role uncertain. As a result, different stakeholder groups have interpreted ELA’s role differently depending on the nature of their interface with ELA.

**ELA Role: System stakeholders.**

Stakeholders of the NC system include elected officials from the time of Charter reform, members of the Charter reform commissions, and members of the media, all of whom were involved in the conversation around the creation of the Neighborhood Council system or directly involved in its design. System stakeholders emphasize ELA’s role as a facilitator -- an entity that supports the work of NCs, but does not take an active role the advocacy or express policy preferences (Charter Reform Participant - 09SS). These views seem to acknowledge that city
departments are organized to respond to the priorities of their General Managers and that despite periodic changes in ELA’s leadership, it has an enduring responsibility towards NCs and its work should not be contingent on the policy priorities of the city’s political leadership (01SS). In this regard, ELA is unique:

If it’s a typical department, then its goal is to feed itself. And to get bigger and get more money and more people. If its goal is to follow what the Charter says, then its goal is to assist the Neighborhood Councils and focus only on the empowerment of them (Former ELA General Manager - ss07).

System stakeholders intended that the NC system empower local community stakeholders. ELA’s role is to ensure that NC voices, and ultimately community stakeholder voices, are prioritized.

ELA Role: City Stakeholder Perspective.

Building on the formal duties and responsibilities set forth in the Charter and Administrative Code, city stakeholders, such as city staff and elected officials, had a distinct perspective when it came to the role of ELA. Informants in interviews -- including non-ELA departmental staff, managers in city agencies, former and current elected officials, and field staff in elected offices -- provided an array of thoughts on ELA and the NC system. City stakeholders characterized ELA’s role as a passive support for NCs and an active resource for the city. For NCs, ELA should provide administrative support to NCs, help “streamline the system” (City Council office - 02CS) making it easier for them to function autonomously, or provide “customer service” to address NC complaints (Office of Public Accountability - 03CS). However, when expanding on ELA’s role in the NC system, city stakeholders described a more active function: ELA should help city agencies with community outreach and serve as a resource to the City Council on how policy issues affect neighborhoods (Former City Councilmember - 08CS). In this way, ELA would serve as a conduit connecting the city and neighborhood stakeholders.
ELA Role: Neighborhood Council perspective.

Neighborhood Council stakeholders held a relatively consistent view of ELA’s role: support NCs. Although “support NCs” was a common refrain, it took various forms. Support included NC training, addressing “customer” concerns with the system (NC Board Member – Mid-city 02E), advocating on behalf of NCs to the city (NC Board Member – Central 06NC), as well as providing technical assistance and helping to mediate board dynamics (NC Board Member – Central 06NC). Some NC stakeholders also suggested the ELA has a role coercing dysfunctional NCs to get their act together by helping establish NCs agendas, creating rules, and setting boundaries for NC discussions (NC Board Member – Westside 08NC). Finally, in contrast to the city stakeholder view where ELA serves as a connector, NC stakeholders also suggested that ELA functions as a buffer against the city. In this way, NCs are able to maintain their independence and not be “[turned] into a city entity” (NC Board Member – South LA NC01).

ELA Role: ELA perspective.

The perspective of ELA staff on the role of their own department is revealing in several ways. First, ELA stakeholders shared the viewpoint of many of the previous stakeholders. ELA staff described: the facilitating and “hands off” roles reported by system stakeholders; the city outreach roles reported by city stakeholders; and the support and enforcement roles described by the NC stakeholders. If some of these roles seem mutually exclusive, ELA staff acknowledged the challenge of balancing them. “[...] you know we’re supposed to [...] guide Neighborhood Councils, to um support them. But we’re also the hammer. We have a dual role and that’s always historically been an issue” (ELA staff member – Field 05D). Given this dual role, ELA staff also
described their work as including mediation, navigation, and monitoring, all words that acknowledge the tension among multiple roles.

In addition to acknowledging juxtaposed roles, ELA staff also described amorphous roles. On the one hand, ELA exists to “provide tools” (ELA staff member – Field 10D) or generally empower disenfranchised stakeholders (ELA staff member – Field 05D). These roles are expansive; but while they grant flexibility in how ELA conducts its work, they provide little guidance on how to narrow that focus effectively. As a result, ELA staff described ELA’s role as unique among city departments.

I think there’s the fact that there’s not one clear thing the department does. I feel like with every other city department it’s obvious. Like accounting or [...] everything else is very straightforward but the Department of Neighborhood Empowerment? It’s like, OK what does that mean? Who are you empowering? How are you doing it? And in what capacity? I think because we work so much with other departments and have to interface so much with... Neighborhood Councils and, you know, stakeholders. I think that’s what makes it hard and confusing sometimes. (ELA staff member - 07D)

The expansive “empowerment” nature of ELA’s role often means responding to NC and city demands on an ad hoc basis. “It’s a lot of hands-on operations and just trying to fix problems and put out fires and it’s a lot of grassroots civic engagement. So that’s where uh stuff can get a little, contacts can get a little messy at times, things like that” (ELA staff member - 04D). Similarly, LA’s elected offices ask ELA to respond to their own priority issues, which they hear about from their NC constituents or that are particularly important to the office. Thus, ELA stakeholders see the role of the department as all-encompassing. ELA’s role is inclusive of the viewpoints of the other stakeholders and balancing the competing demands of stakeholders is part of ELA’s role as well.
Synthesis of ELA Roles.

The ELA’s role, as it is formally defined, suggests the existence of a semi-autonomous NC system that requires only minimal support to function. The position of ELA within the city organization and the demands made of ELA by city leaders suggest that city stakeholders regard the NC system itself as a resource for the city, and ELA provides the means of using it. Neighborhood Council stakeholders, on the other hand, view themselves as independent groups and ELA as an instrument of city control. System stakeholders present a more nuanced view, seeing ELA would serve as a facilitator working to achieve both city and NC goals. While ELA stakeholders acknowledge the hope of working towards the dual roles of assisting both the city and the NCs, they are also confronted with the realities of implementation, including the fundamental opposing interests of these groups. Given the nature of ELA’s position between various stakeholder groups, and the unknown circumstances in which it would be operating in the future, it is not surprising that there are different perspectives regarding ELA’s role. Certainly, ELA has taken advantage of its small size and relative flexibility to tailor its interactions to the needs and expectations of various stakeholders. This has been particularly important when working with stakeholder groups who do not get along, or whose needs and expectations seem opposed.

However, role ambiguity presents additional challenges. The multiplicity of roles ascribed to ELA affect its ability to function as a boundary structure. Different stakeholder groups may or may not recognize ELA’s obligations to others, or the rights of other stakeholder groups to solicit attention from ELA. Many ELA staff acknowledge the difficulty of identifying the parties to whom they answer: the city’s elected leaders, who are empowered to direct the operations of the city, or NCs, upon whose purpose the existence of ELA is premised. Contrasting expectations of ELA also
affects how its performance is evaluated, and whether ELA is considered an ally, an adversary, or simply incompetent. These characterizations impact ELA’s ability to develop trusting relationships with stakeholder groups or advocate for funding appropriations from the city, and compromise the efficacy of ELA’s work overall.

I think [...] this is largely about role definition. Now if you know the role, it’s easy to find the right people. In the absence of knowing the role, you get different kinds of people with different role expectations, sometimes it works; sometimes it doesn’t. (Charter Reform Participant - 05ss)

As this interviewee suggests, organizational role ambiguity affects staffing role ambiguity. Much like the different expectations among stakeholders, different expectations among prospective staffers can lead to misunderstandings both inside and outside ELA. This can compromise working relationships with stakeholders, disrupt departmental routines, and lead to morale issues within the department. All of these factors contribute to both the performance of the department, its credibility as a boundary organization, and perceptions of overall system functionality.

**Major Findings and Summary**

The development of the Neighborhood Council system reflects a tension in the socio-political climate in Los Angeles that extended back decades. In particular, City conditions during Charter reform in the 1990s contextualize the epistemological and pragmatic goals of the NC system. During that time, a power struggle between the Office of the Mayor and City Council drew energy from long-simmering political dissatisfaction in local city neighborhoods. The promise of improved local representation in City Hall provided crucial political support from voters for renegotiating the division of powers between City Council and Mayor. However, reformers at the
time held mixed opinions about whether neighborhood councils could or should diffuse power from City Hall into the neighborhoods.

Furthermore, the divisive conditions under which the NC system was developed led to differing expectations and aspirations for the system. For instance, City stakeholders viewed NCs as a politically expedient means to achieve other elements of Charter reform, whereas neighborhood advocates viewed the creation of the NC system as validation of local concerns and contributions to the City. Differing interpretations of the role of NC system extended to confusion about the role of ELA in establishing and implementing the NC system. As a result, ELA is perceived as having multiple roles, some perceptions of which conflict with each other and lead to conflict among stakeholders. ELA, in contrast, understands its role to be multifaceted and to involve navigation across the boundaries of conflicting expectations. The boundary practices by which ELA manages conflicting expectations and aspirations will be reflected in the findings of my research.
Findings: Policy Boundaries and Boundary Practices

Well, and you need like... different rules and different ideas to solve a problem. Like, if we knew formulas for all the problems we have, then we wouldn’t be having this conversation (ELA staff member - 09d)

Purpose

This chapter presents the boundary relationships between the Neighborhood Council system and the City in the area of policy, describes different types of policy boundaries between City and neighborhoods, identifies some of the problems that arise in these boundary relationships, describes how the ELA manages these policy boundary relationships, and shows how ELA’s approach has evolved over time. The chapter begins with a description of boundary relationships between Neighborhood Councils and various City entities, including City departments and offices, as well as elected City leaders, such as the Mayor, City Council, and City Controller. This discussion outlines how these different entities function through different ways of knowing, and describes how these differences lead to tensions in relationships. This chapter continues with an examination of two noteworthy policy boundaries: 1) citywide perspective versus a neighborhood perspective; and 2) substantive policy differences. It then depicts governance and political problems resulting from these boundary contests, and provides examples of the boundary practices ELA has employed to mitigate or resolve these problems. Each section ends with a discussion of how ELA’s boundary practices have adapted to problems arising from the evolving policy boundary relationship between City and neighborhood stakeholders over the last 17 years.
Introduction: Policy Boundaries

Codes under the policy theme reflected two boundaries: citywide/local differences and substantive policy differences, and fell within nine boundary practice subcategories. The citywide versus local boundary had five subcategories and the substantive policy differences boundary had four subcategories. The figure above contrasts relative barriers to implementation with the proportion of subcategory codes within the theme. The purpose of the chart is to illustrate where the most activity and discussion occurred regarding various boundary practices. Thus, policy findings suggest that the most activity is concentrated among boundary practices that have the fewest barriers to implementation and rather than those activities with the most intractable or
complex barriers. This may reflect a prioritization of functional collaboration while inroads on more fundamental policy differences remain a more long-term effort.

Neighborhood Councils in Los Angeles developed as a response to broad discontent in local neighborhoods due to community disenfranchisement at the hands of the City government. The purpose of a Neighborhood Council system is to decentralize governance and shift decision-making away from an unresponsive bureaucracy and towards active and attuned local communities. A Neighborhood Council system seeks to increase citizens’ access to meaningful participation in local government and improve City services provided to local communities through the mobilization of local knowledge. Despite well-intentioned objectives to enhance civic engagement, reduce disenfranchisement, and improve City services, the implementation of the Neighborhood Council system in Los Angeles has encountered challenges. The Department of Neighborhood Empowerment (ELA) is the City department established during Charter reform to oversee the Neighborhood Council system and is responsible for solving problems in the effort to achieve the system’s goals.

Implementation challenges can be traced to a fundamental design characteristic of a system that promotes participation: the more participants, the more viewpoints and the more room for misunderstandings and disagreements. The various actors involved in the Los Angeles Neighborhood Council system — Neighborhood Council participants, departmental bureaucrats, elected officials, the Department of Neighborhood Empowerment (ELA) leadership and staff, and local neighborhood stakeholders — often have opposing expectations, mistrustful and antagonistic relationships, and disagreement on how best to achieve outcomes. Furthermore, these groups
and individuals often express conflicting opinions on what the system’s overall objectives should even be.

NCs and the City address the same issues differently, reflecting differences in their ways of knowing. A way of knowing is how a person or organization interprets the dimensions of a policy issue and makes sense of the relationships between the elements in that space (Feldman & Ingram, 2009). Different people and organizations make sense of these relationships by different means, based on their own experiences and the analytical techniques available to them: everything from faith and intuition to experience-based logical reasoning and formal policy analysis processes (Feldman & Ingram, 2009). Within the NC system, community stakeholders, City bureaucrats, and policymakers rely on an array of analytical processes and thus a diversity of ways of knowing.

Community stakeholders, even the subgroups represented in Neighborhood Councils, occupy a variety of roles in the community, including residents, business owners, workers, churchgoers, students, and others, all of which are influenced by other aspects of their backgrounds, including age, ethnic background, occupation, professional training, and combined life experiences. Among Neighborhood Council participants, however, stakeholder ways of knowing are ultimately contextualized by approaching policy issues with the question: Is this good for my neighborhood? Furthermore, a neighborhood advocate may claim his or her status as a representative of the local community, providing the necessary status to reject undesirable projects or at least confer illegitimacy on any decision that goes against the community’s wishes.

I do take that oath very seriously, it’s not my voice. [You] have to think about what’s best for the community, right? You know, so that gets hammered in but [...] actually, I’m very comfortable with that. And I really believe in that. (NC Board Member - 08nc)
The ways of knowing of City stakeholders, both bureaucrats and elected officials, are comprised of all of these dimensions of personal background as well. In fact, shared personal and professional interests and values offer avenues for communication and empathy, and potential collaboration, between City and neighborhood stakeholders. However, City stakeholder ways of knowing are ultimately contextualized by approaching policy issues with the questions: What is best for the city? What is the City ethically obligated or legally required to do? In this way, a city planner may draw on their professional obligations to locate neighborhood amenities and nuisances equitably across the city, and legitimize his or her actions to the greater good of the city or an abstract “good city planning.”

We were actually trying to create affordable housing in the City and trying to do that requires citywide policies, you know. And by balkanizing the process, it was really making it difficult for folks who were trying to do that type of work. And there were just some citywide policies that require that citywide kind of coordination, and they just can’t be left up to local decision-making or neighborhood, you know, very localized decision-making [...] I mean, it’s not right or wrong it’s just that sometimes you need a broader analysis to be able to make the right decisions, the best decisions for the City and for the area. (NC Community Participant/NC Review Commissioner - 02ss)

Ultimately, different ways of knowing lead to viewing policy proposals differently and result in different approaches to the same basic set of facts. One perspective does not necessarily supersede the other; it simply has different focuses, different sets of tools, and, perhaps, different conclusions. One respondent described experience in different levels of government as an illustration of different types of tools and focus of attention. “The former Prime Minister of Japan became the Mayor of Nagoya. So was one the training ground for the other? [No.] One’s just hyper local and the other one is kind of global and they’re all about power and organizing” (ELA Staff Member - 03d). However, unlike the example in Japan, stakeholders in Los Angeles are less
equipped to appreciate these different perspectives. As a result, community and City stakeholders are often challenged to come to a mutual understanding on policy decisions, end up talking past each other, and settle into an unproductive contrarian dynamic.

The gulf between the ways of knowing of City stakeholders and Neighborhood Council stakeholders is an inherent aspect of the NC system, and manifests in different ways. City and NC stakeholders express contrasting viewpoints on substantive policy questions, including the City budget, land use and development issues, oversight of the Department of Water and Power and other City services. Furthermore, City and NC stakeholders use very different social and organizational processes. Finally, City and NC stakeholders express contrasting expectations regarding to the role of the NC system, the appropriate balance of power between a centralized City and the neighborhoods, and their general worldview on how a government should run. These different ways of knowing comprise major boundaries between City and NC stakeholders, seriously compromising their ability to work together effectively in a single system of governance. These boundaries, and ELA’s role in managing them, will be more thoroughly presented in the following sections.

**Boundary: Citywide Perspective versus Local Perspective.**

Despite the diversity of their individual policy priorities, NCs draw into closer alignment when it comes to dissatisfaction with City policy-making. NCs developed on the premise that elected City leaders were disconnected from their constituents and the pulse of the communities in their districts. With over 250,000 constituents in each council district, the average member of the community has limited meaningful access to his or her council person. Those with most access tend to represent groups with an established interest, such as development firms, trade
organizations, chambers of commerce, and organized labor. Additionally, topical experts who play a central role in crafting City policy on issues of neighborhood concern, such as City planners, public administrators, and other bureaucratic professionals approach problems from a citywide systemic perspective. Although these individuals provide expertise in their various fields, NCs and local advocates feel that this expertise, based in bureaucratic systems or specific financial interest, is prioritized over the legitimate experiential concerns of local stakeholders. Despite some policymakers’ proactive efforts to solicit policy input from their constituents, these efforts generally allow constituents to become one additional voice in a crowded field of stakeholders. Thus, differential access to policymakers can result in divergent policy priorities between policymakers and community stakeholders. Because community stakeholders rarely see their own recommendations reflected in policy decisions, and often struggle to even identify the best venue to provide input, they perceive a neighborhood versus City dynamic in policymaking.

On the other hand, elected officials oftentimes struggle to differentiate between genuine widespread community concerns and an outsized reaction by just a few impassioned neighbors. A former City Council staffer, suggested that the threshold of constituent complaints for halting a piece of legislation and prompting further review was easily achievable if a community was organized enough to do it.

If you [got] 25 faxes on a certain subject, everything stopped. We stopped everything and began addressing that. Now, of course, it is emails, and it doesn’t take that many more emails to get an elected official to do something. So how hard is that really? To be able to do that?” (Former Councilmember Staff - int07ss).

Because a reaction of even this modest magnitude is infrequent, council offices often assume that constituents are indifferent or generally supportive of the proposed legislation or projects affecting the district.
Beyond simply appeasing their district constituencies, councilmembers each represent 1/15 of a citywide governance structure. Thus, they also must weigh the interests of a specific neighborhood against the City or even other neighborhoods within their district. Some projects that are essential to the functioning cities, or mandated by law, may yet be considered nuisances to their neighbors.

I think the biggest challenge was trying to find a balance between allowing for that very localized access... to create better access and engagement and provide a voice to folks at the local level with, but also not disrupting processes that required a much broader consensus across the City (NC Review Commissioner - ss2).

All cities must have halfway houses, transit projects, and waste disposal sites, and yet few neighborhoods would choose to house them if it were avoidable. Each city has an affordable housing quota that is mandated by the state, and yet neighborhoods express concerns with the effects of densification, traffic, home values, and changing neighborhood character, a thinly veiled euphemism for concerns about the demographic and cultural characteristic of the prospective residential population. That each council district is obligated to host its share of locally undesirable projects for the greater good of the City is sometimes lost on local residents who can understand the need for these projects as long as they are “not in my backyard” (NIMBY). These differences in policy priorities highlight the boundary between a local neighborhood perspective and a citywide perspective, and how that dynamic plays out in political battles.

**ELA Boundary Practices: Citywide vs. Local.**

The citywide versus local argument characterizes a structural conflict between Neighborhood Councils and the City bureaucracy, and reflects the initial secessionist impulses that led to Charter reform and the formation of the NC system in the first place. Moreover, the boundary between the ways of knowing of City and Neighborhood Council stakeholders represents
a worldview conflict between Neighborhood Councils and the City bureaucracy, and draws from their different professional, personal, and situated experiences. Local neighborhood stakeholders prioritize policies that support local interests over the interests of the broader city, particularly if the citywide interest directly opposes local neighborhood interests. However, the City government’s decision-making apparatus typically favors the policy recommendations of its own professional analysts, which approaches policy issues from a citywide perspective. Thus, there is an enormous power disparity between city decision-makers and local community advocates. ELA’s mission of promoting participation and improving government responsiveness, therefore, involves enhancing communication and addressing this power imbalance. ELA achieves this by elevating the community voice so that NC policy perspectives can be heard and potentially affect policy-making, and by expanding the city’s outreach. The practices that ELA uses to bridge the citywide/local boundary include some general practices, such as connecting, training/capacity building, and outreach, as well as specific initiatives, such as departmental liaisons.

ELA uses a variety of organizational structures to connect Neighborhood Councils to City stakeholders. As an organization, ELA serves as a conduit between NCs and the city. ELA has an extensive mailing list and rolodex of community stakeholders that makes it a powerful standing resource to City departments looking to conduct outreach (Elected City Official - 06cs). Because ELA is situated as a conduit, some ELA stakeholders feel that ELA’s role promoting City initiatives should be made formal and explicit. They maintain this would allow the department to be funded sufficiently to fulfill the task it is already conducting on an informal basis (ELA staff member - 16d).

Some stakeholders conceptualize ELA as the face of the City while NCs are the face of the community. Therefore, ELA and NCs are links in a chain of connections between community
stakeholders and City stakeholders and function as the structural connection between local and citywide interests.

If we connect Neighborhood Councils to City Hall, then it to me it naturally follows that the Neighborhood Councils connect stakeholders to us. Like they’re liaising between the people and the department. So the department knows what the people want because of the councils’ help. It’s that whole thing: it’s all about who you know. So if I’m a stakeholder and I go to my Neighborhood Council, maybe they know how to get my problem solved. But they need the department’s help. So then the department will help them. And then the department needs the Neighborhood Council’s advice, or input to know what to ask for in City Hall. Like to say “here are the issues.” So it only works if everybody along the way [works together]. (ELA staff member –09d)

Finally, as the face of the City directed towards local community stakeholders, ELA serves as a transparency and accountability structure for the city. ELA explains the City perspective for initiatives, even using unpopular justifications, to build trust with local stakeholders based on honesty and forthright communication. Sometimes this role as an accountability structure for the City is compromised when the actions of ELA are difficult to explain or justify to community stakeholders. Furthermore, not all City business is public knowledge, including personnel matters, which creates blind spots in public interest and muddies the waters on the nature of transparency.

**Connection.** ELA uses a variety of practices to connect Neighborhood Councils to City stakeholders. This stems from a philosophy that “you problem solve by talking to people face to face. They want to know who you are and how you’re going to help them. It’s about connecting” (int02e). ELA serves as the face for the City when dealing with Neighborhood Councils and vice versa, so the bridge between NCs and City stakeholders is highly dependent on how well ELA is able to create connections. Because maintaining familiarity with City processes and policy priorities is too large of a responsibility for most NC volunteers, ELA serves as a “liaison” between NCs and City stakeholders and helps NCs to fill in gaps in understanding (ELA staff member - 10d).
Additionally, ELA directs NCs to departmental representatives that may be difficult to locate through publicly available City directories like 311, or online.

Because ELA has fewer total NC stakeholders than City departmental representatives who serve the entire City population, it is more feasible for ELA to be attentive to NC requests and follow-up on contacts than depending on customer service representatives who may be overwhelmed by individual service complaints (ELA staff member - 07d). Furthermore, NC efforts to engage with City departments on policy issues may represent a categorically different kind of contact than a customer service complaint, and one for which City departments, used to taking their policy direction from City Hall, may be unaccustomed.

In addition to facilitating contact between NCs to City departments, ELA can help NCs navigate what could otherwise be a confusing organizational web, and educate NCs on the roles of various City agencies and how they make policy decisions. Ultimately, providing quick directory access to City agencies can prevent wasted time and frustration among NCs, and also boost NCs’ own reputation as a City resource among their community stakeholders.

[...] that’s the goal. That’s ultimately what we want to see. We want to see this connection, if you will, among the departments, the Mayor’s office, the Council offices, the Neighborhood Councils. We want to bridge the gap in every way possible so that the City can run more effectively and [...] everybody feels connected and know what resources are available to them. (ELA staff member - 06d)

ELA’s connecting practices promote more effective City operations. Connecting neighborhood residents, and their on-the-ground perspective of City services, with City stakeholders who craft and enact City policies and programs can enhance City decision-making both from a substantive standpoint, if NC stakeholders have critical information to contribute, and from a legitimacy standpoint, if NCs are valued as a valid stakeholders in City policymaking. To this
end, ELA connected the Department of Aging with a group of Neighborhood Councils that represented aging neighborhoods. They held a “senior symposium” where the Department of Aging was able to present its programs and resources directly to community members, and also solicit feedback from older adult community members and other stakeholders in older adult programming (ELA staff member - 08d). In this case, the connecting boundary practice took the form of planning a joint event that bridged citywide policy efforts with local neighborhood needs to the benefit of both.

The relationships that have developed between the NC Budget Advocates, a self-organized subset of NC participants, and City departments and elected offices are another example of the productive potential of connecting practices. ELA has helped to connect and support the Budget Advocates with City entities to gather budget information and present their own City budget recommendations to elected officials. Although the Budget Advocates are a highly functional group, ELA has played an important role over the years arranging meetings with the Mayor and other key City players, which would be difficult to accomplish without ELA support. Assisting the Budget Advocates logistically and pushing City departments to engage allows NCs to participate in the City budget process at points in the City timeline when they can be effective, and when their recommendations can be seriously considered and implemented.

Sometimes, in the course of addressing community issues, miscommunications arise between neighborhood stakeholders and City stakeholders. Council offices or the Mayor’s office frequently contact ELA regarding inquiries from Neighborhood Councils on projects that are already underway or that City leaders had thought were resolved. In these situations, ELA must respond on multiple fronts, explaining misunderstandings and negotiating sticking points in policy
differences, to quell the annoyance of City leaders and temper the impatience of frustrated NCs. Thus, connecting practices frequently involve both situational “putting out fires” (ELA staff member - 04d) and active management of cross-boundary relationships over time.

Ultimately, ELA’s connecting practices involve navigating challenges and complications in bridging the gap between local and City stakeholders. First, ELA can only facilitate relationships among others to the degree that it has positive or productive relationships itself. Some City departments have limited contact with the public, and therefore limited awareness of ELA or the Neighborhood Council system as a whole. ELA has no authority over other City entities and no ability to compel their cooperation. Accordingly, connecting NCs to these departments involves educating them on the role of ELA and arguing that connecting to NCs may assist or enhance the work of the department. In some cases, particularly when NCs have an overriding complaint or concern about a City entity, ELA may solicit support from an elected official to prompt a response from another City department (ELA staff member - 06d). However, this approach is also predicated upon political support for ELA’s effort. Furthermore, connecting NC and City stakeholders involves shared policy language and adherence to City processes. ELA’s role in translating these differences can appear to reduce grand policy efforts to minutiae, bogging down joint policy-making efforts, and compromising its relationship with stakeholders on both sides. Thus, ELA’s connecting practices involve managing ever-emerging barriers to bridging citywide and local policy boundaries.

ELA’s efforts to connect City and NC stakeholders are not entirely about tangible improvements in City function; connectedness offers inherent benefits. The boundary between the citywide perspective and the local perspective is the manifestation of disconnection, and
bridging the boundary or reducing the disparity between these perspectives achieves more than better-informed policies. It also reduces the civic alienation and mistrust that played a role in secession threats and Charter reform in the first place. Thus ELA practices connection to make neighborhoods feel like their voice matters and they are a part of the city.

If you think about like it’s not just about what impact they’re having on City government, but it’s also about how [...] people feel about living in this huge city. Do they feel like they have a voice? Do they feel like they have a way to be connected to what’s going on in the city? (City staff member - 07cs)

Translation & Interpretation. ELA uses a variety of practices to bridge ways of knowing between Neighborhood Councils and City stakeholders. ELA translates worldview differences across boundaries of understanding between NCs and City stakeholders.

We understand that there are barriers to communications on both sides, that there’s cultures on both sides that... don’t mesh. And that we are able to get in there and somehow... become that translator to help folks understand each other” (ELA staff member - 01d).

Translation involves removing barriers to communication, such as language differences, where City stakeholders typically use wonky policy language to understand policy issues and NC participants use more informal lay language, or sometimes even narrative or experiential descriptions of issues. Furthermore, City Council actions and proposed ballot initiatives are written according to a specific formula that meets administrative and legal requirements for structure and content that can be difficult for a lay person to understand. In addition, proposed initiatives are produced in such great volume that can be difficult for a member of the public to consume. NC stakeholders frequently call ELA staff to get an explanation for what a council action means. “Hey, what does this mean for us? If we were to vote this way, what would it mean, and if we were to vote against..?” (ELA staff member - 07d). To further assist with translating policy documents, the
ELA Government Relations team regularly produces a policy briefing document that summarizes council actions and distills the meaning of policy issues in lay terms for distribution among Neighborhood Council stakeholders.

ELA must also interpret Neighborhood Council activities and communications for City bureaucrats and council offices. When Neighborhood Councils or community members fail to attend city-sponsored town halls and briefings, City leaders erroneously assume that they are disinterested in that policy issue. Similarly, City leaders sometimes fail to appreciate how a lay person might have a different understanding of the ramifications of a policy action that seems perfectly clear to someone versed in policy jargon. As a result, City stakeholders and elected officials are occasionally confronted with unanticipated angry reactions from NC stakeholders. ELA serves as a go-between and interpreter of Neighborhood Council ire, explaining to City stakeholders how the different perspective of NC stakeholders allowed them to interpret a given policy action completely differently and advising how City stakeholders might make their own case to NCs.

You know [NCs] can be nice, yes they can be critical too but that’s their job, and sometimes I think I feel like my job is to get in there and explain that to [City stakeholders] who may wonder “why are they always yelling at me? Or why are they ... why can’t you tell them what to do?” because sometimes I’ll have people say “why can’t you just tell the Neighborhood Councils...?” you know, that’s not how it works. (ELA staff member – 01d)

Being able to translate among these stakeholder groups involves being able to communicate effectively with each of them. As a result, ELA staff engages in code-switching, switching not only between the policy jargon and lay language but also between the perspectives of each stakeholder group. Veteran staff, with experience serving as a go-between for the NCs and the city, has developed these skills. Recently, ELA has focused on hiring field staff with a variety of
backgrounds, particularly those with experience working in the offices of elected officials, to increase ELA’s fluency in those ways of knowing. Although ELA is expanding its capacity to effectively communicate with each group, new staff still struggle to develop comfort and skill working with both groups. Some staff jokes about the learning curve as a trial by fire process.

It’s sometimes challenging but we’ve been doing it so long, at least the veterans. We’ve been doing it so long we’re kinda you know... I guess you could say we have experience playing those different roles. Um, and I think when you’re first starting out, it can be overwhelming. (ELA staff member - 13d)

Because policy conversations are often fraught with frustration stemming from policy disagreements or perceived political slights, ELA also serves to translate language and perspective even as communications become heated and additional barriers to understanding develop.

In addition, translation and interpretation takes the form of legislative update documents. Within the last two years, in an effort to boost Community Impact Statement (CIS) participation, ELA began writing a weekly memo listing forthcoming legislation and describing its actions and potential effects in lay terms. This practice was meant to deliver legislative information in a more digestible form than the typical jargon-filled intra-departmental descriptions. Making this information more understandable to NCs allows them to mobilize in support or opposition more effectively. Additionally, NCs can identify areas where City analysis is incorrect or misaligned with community concerns, and can then provide feedback to policymakers.

**Training & Capacity Building.** ELA also bridges citywide and local boundaries by engaging in training and capacity-building practices. NCs and their local stakeholders possess varying capacities to effectively engage with City stakeholders to articulate their local interests in the context of citywide issues. ELA conducts capacity building training with NCs and NC board
members to maximize their efficacy. In some cases, NCs operate as highly functional organizations, able to advocate for their needs with little or no input from ELA. In other cases, NCs struggle to convene a meeting, let alone advocate for local interests to the City (ELA staff member - 04d). ELA provides introductory training to newly elected board members on the basic operations of NCs, such as funding and Brown Act, and then targets struggling NCs for additional training. Many NC stakeholders, however, find the baseline level of training insufficient to help NCs develop operational proficiency and become frustrated with ELA for censuring them for non-compliance (NC board member - 02nc). Furthermore, the transient nature of NC boards means that not only is there limited institutional memory for operations or long term strategic actions among NCs, but there is also a constant stream of new board members requiring continuous training (NC board member - 02nc). ELA’s own limited number of training staff requires a triage approach: focusing their efforts on the most dysfunctional NCs, and limiting involvement with more functional NCs to passive encouragement and the hope that those NCs are able to develop a durable institutional culture that bridges turnover among board members. Ultimately, a high capacity NC can be an effective advocate for its local interests while a low-capacity NC is ineffective. This is why capacity-building training is an important practice to bridge the boundary between local and citywide perspectives.

**Departmental Liaisons.** A specific initiative that system stakeholders have considered is the creation of “Neighborhood Council liaisons” within all City departments that interact with NCs (int01ss). These liaisons would advise departmental management on how to better foster connections to NCs, and would provide a go-to person within the department with whom ELA and NC participants could work. This initiative would develop future outreach structures for the city,
help increase awareness of the NC system within City entities, and facilitate the connective work of ELA.

**Civic University.** Another specific initiative that ELA has developed and run for the last several years is the Civic University program (Civic U). Civic U is a collaboration among ELA, the Mayor’s office, and the Pat Brown Institute for Public Affairs (PBI) based at California State University Los Angeles (CSULA), which conducts the training. The goal of Civic U is to train NC participants on how the City of Los Angeles functions. PBI provides an overview of how the City government is structured, describes the typical bureaucratic processes with which NCs interface, and offers best practices on how NCs can work with City departments and City elected offices. The better the understanding of City processes that NCs have, and the more familiar they are with the city’s perspective on policy issues, the more effectively they are able to craft their advocacy and get the results they want (int04cs). Additionally, Civic U clarifies the role of Neighborhood Councils and ELA within the City system.

 [...] and this is largely about role definition. Now if you know the role, it’s easy to find the right people. In the absence of knowing the role, you get different kinds of people with different role expectations, sometimes it works and sometimes it doesn’t. (Charter reform participant - 05ss)

Role definition not only helps to bring expectations into alignment among stakeholders, but also allows existing NC participants to enhance their own effectiveness and to focus future recruiting efforts on prospective participants who are well suited to their roles. Role definition also helps NCs avoid being co-opted by City stakeholders, which is a driving concern of NCs who see themselves as a political foil to City insiders.
After several successful cohorts of Civic U, ELA expanded the program and created Civic U 2.0 and Civic Youth. Civic U 2.0 builds on the lessons of how the City works. It facilitates small groups of NC participants in designing community projects or policy proposals for consideration by City Council. In a recent Civic U 2.0 program, a panel of City administrators, including the City Administrative Officer (CAO), the Mayor’s Chief of Staff, and the president of CSULA critiqued the proposals and provided feedback for participants to make changes and potentially present before the City Council. Civic Youth mirrors the general curriculum for Civic U, except it is directed towards a high school age audience. In addition to presenting a primer on City organization, Civic Youth also provides technical assistance and support to youth who face barriers to participating in their local NCs.

Figure 7 - Civic University, photo by David Ng via https://calstatela.patbrowninstitute.org

Evolution of ELA’s Citywide versus Local Policy Boundary Practices.

Connection. Connections between NCs and City stakeholders have evolved significantly since the advent of the NC system. Specifically, more City leaders work directly with NCs than in the past. Over the last 17 years, some NCs have demonstrated their capability to provide useful
substantive information on policy decisions, and this has been recognized by department heads and elected leaders. The more positive interactions and the fewer political gaffes, the more closely NCs and City leaders have been able to work together. Although liaisons have not become firmly established in every department, positive collaborative experiences with NCs have created more opportunities and willingness among City departments to work with NCs. Additionally, NCs have circumvented the constraints of their advisory role and expressed their power politically. NC political activities have taken the form of opposition to ballot measures such as the DWP initiative (Proposition B), organizing around local issues such as the Porter Ranch gas leak, opposition to City Councilmembers. Some NC participants have even run for political office themselves.

As a vocal community group in elections that do not typically draw a large turnout, NCs’ political activities can have a major impact on electoral politics. Several current members of the City Council have previously served on Neighborhood Councils, as has the current City Controller. And while these City Council people do not always adhere to the demands of the NCs in their district, many do find a way to work with them. Councilmember Ryu, for instance, makes available his entire discretionary budget for NC-proposed projects in his district. In addition, when there was funding to make improvements to broken sidewalks, Ryu asked NCs in his district to map and prioritize sidewalks for repair. This level of partnership, and community access to policymakers, was rare 20 years ago.

Although increased connection to City leaders has helped individual NCs directly, and given a boost to the NC system as a whole, this direct connection has created new complications for ELA’s work. ELA’s role as a mediator between City leaders and NCs has been reduced in some cases; however, ELA’s other roles requiring constant contact with NC have not. This situation
sometimes results in muddled lines of communication, or with NCs “going over the head” of ELA in pursuit of a more satisfactory response from a City Councilmember. City leaders will vary in how much they will intervene with ELA, but typically ELA will need to explain its actions and how it intends to resolve the NC grievance, adding to ELA’s workload. Overall, increased connection has produced positive effects for the NC system; however, it also has resulted in some undesirable side effects for ELA.

**Training and Capacity Building.** The training and capacity-building support that ELA provides to NCs has evolved over the years. Training new board members, and retraining struggling board members, in basic administrative tasks remains a priority for ELA. The department has taken steps to streamline this training, and increase access to basic funding, ethics, and administrative information through an online “self-serve” portal, which includes policies, FAQs and video training sessions. That all NC participants have a grasp of baseline information, particularly the legally required training on ethics and funding, is the goal of the new board member training program.

However, ELA’s active training focus has shifted from administrative tasks to helping NCs have a policy impact. In particular, the training program has focused more on writing and submitting Community Impact Statements, and using social media to conduct community outreach and foster policy conversations in the online community. Additionally, ELA has specifically targeted youth and young adults for training and cultivation as NC board members through programs like Civic Youth. Many youth in the City are already informed and involved in organizing around issues in their neighborhoods, and ELA sees their potential for infusing NCs with new energy and creativity. The shift in focus reflects the improved baseline capacity of NCs, both in terms of
experience and self-support, and also in direct pursuit of the NC system’s ultimate goal of increased policy impact by expanding access to policy conversations.

Civic University. Although Civic U has been offered only four times, the nature of the training has already evolved. Civic U began as an introduction to City organization and processes. Due to the unique history and structure of Los Angeles, many participants were unfamiliar with the basic organization of the city, the role of several important offices such as the City Administrative Office, and the Chief Legislative Analyst, or the avenues of power. Civic U training allowed NC participants to understand the role of NCs within the City, a revelation for many participants who were not involved during Charter reform or shortly thereafter. However, the favorable reception of Civic U prompted calls for an advanced Civic U 2.0 that trained NC participants on the most effective ways to engage with policymakers and make policy or programmatic proposals. To this end, at the close of Civic U 2.0, training participants presented proposals to a panel of reviewers including Miguel Santana, the City Administrative Officer, Ana Guerrero, the Chief of Staff to Mayor Garcetti, and William Covino, President of Cal State University Los Angeles. Like the internal training series offered by ELA, Civic U has evolved to reflect both the increasing operational capacity of NCs and an increased focus on the NC system’s primary goal of becoming as informed and impactful on policy decisions as possible.

Boundary: Substantive Policy Differences

The Neighborhood Councils are a citywide system – more than 90% of the City of Los Angeles is covered by a Neighborhood Council – and it therefore represents areas with vastly different political and cultural ideologies. For instance, the Northwest San Fernando Valley, an affluent and largely conservative White suburb of Los Angeles, has different policy priorities than...
Boyle Heights, a low-income Latino neighborhood just east of downtown Los Angeles. Similarly, Venice, a beach city on the Westside, may have different concerns than a harbor neighborhood like San Pedro. Furthermore, some NCs represent more than one distinct neighborhood that may or may not have aligned policy concerns. Downtown LA Neighborhood Council includes the financial district, the historic core, and Skid Row. This NC thus represents parties with ostensibly misaligned interests, such as: 1) promoting international financial investment; 2) revitalizing local retail and a “livable” downtown; and 3) protecting and housing homeless people.

The diversity of neighborhood interests corresponds with a diversity of policy priorities, and NCs use various avenues to advance NC policy advocacy efforts, including soliciting support from ELA. Notable NC policy campaigns included DWP reform efforts in the mid-2000s, which resulted in additional transparency and accountability measures; and recent NC support for a neighborhood integrity measure that would freeze new development and give local communities more control over land use decisions. NCs have also been active in the citywide homelessness campaign. Additionally, NCs have been involved in narrow local campaigns, such as remediation of the Porter Ranch gas leak, environmental justice campaigns built around pollution from fracking and oil refining in low-income communities, park restoration in Skid Row, construction of traffic calming measures, and campaigns against gentrification. However, NCs from across the City have historically weighed in on the annual City budget.

It is important to note that in a system of 96 Neighborhood Councils, representing distinctly different areas of the city, NCs not surprisingly find themselves in opposing positions on particular campaigns. On the other hand, some NCs find alignment on specific issues even though they may have little in common otherwise. Development, and gentrification specifically, is an issue
that seems to affect neighborhoods across demographic divides. Overall, the web of voices in alignment and opposition on various policy issues amongst NCs results in a cacophony of substantive policy interests in the Neighborhood Council system.

This diversity of substantive policy preferences among NCs complicates the city’s ability to account for them in formal policy-making processes and decisions. Even with the use of tools such as Community Impact Statements, which allow individual NCs to articulate support or opposition to proposed council actions, elected officials receive different messages from different NCs. Additionally, each council member has multiple NCs in his or her district, which may disagree on specific proposals. Finally, the diversity of policy priorities among NCs is often conflated with dysfunction by City staff and elected officials who may mistakenly assume that NCs invariably reflect a single large stakeholder group with a cohesive set of policy priorities.

**ELA Boundary Practices: Substantive Policy Differences.**

**Outreach.** ELA bridges substantive policy boundaries by engaging in outreach practices, which take several forms and serve multiple purposes. The first and most important dimension of outreach is to increase community participation in Neighborhood Councils. The more community stakeholders involved, the more accurately NCs represent community interests, and the better attuned City programs are to community needs. Additionally, ELA focuses outreach practices around specific issues, programs, or campaigns to elicit more focused interest, rather than general participation. For instance, ELA has organized outreach events to solicit community feedback on issues such as homelessness and raising the minimum wage and to raise community awareness about City implementation plans. In addition to fostering policy conversations between City and neighborhood stakeholders, these events serve as outreach tools for the NC systems as well: they
give NCs opportunities to recruit and organize community members who are energized to become involved in advocacy on important local issues. ELA helps NCs conduct outreach in several ways, including newsletters and social media, election-centered outreach, enlisting promotion by elected officials, and reaching out to schools.

ELA uses social media, including Facebook, Twitter, and Nextdoor, both to cultivate a constant digital presence for the NC system, and also to promote participation among younger stakeholders (NC election worker - 01e). Facebook and Twitter allow NC members and members of the public to follow goings-on at ELA, and other City departments. As more and more elected officials and City departments utilize social media to update and solicit feedback from their constituents and consumers, ELA can both put out its message and also connect City stakeholders with members of the public. Nextdoor, in particular, is a social media platform organized around local neighborhoods. It provides an online venue for local residents and business owners to share notifications of upcoming meetings and events, jobs listings, and classified ads with others who live nearby. Nextdoor also serves as a platform to discuss local issues of concern, such as burglaries or unsafe street-crossings, updates on local development, or new City legislation, which makes it a potentially strong community outreach tool for ELA. In fact, during the 2015 elections outreach process, ELA coordinated with Nextdoor and the County Registrar-Recorder to create Neighborhood Council district “layers” to promote NC elections and target elections information to the appropriate district households. The large volume of complaints from residents regarding unsolicited contacts reflects a negative byproduct of an otherwise the highly effective combination of social media and traditional mailers as an approach to community outreach.
Conducting digital outreach also provides a means for ELA to recruit more participation from young people. The demographic composition of Neighborhood Councils skews towards older adults with poor representation from youth, young adults, or working families. By encouraging and conducting outreach on digital platforms, ELA cultivates a conversation in venues that young people use which may not have been considered by current NC participants. Moreover, ELA has begun conducting NC outreach in schools, which often function as centerpieces of neighborhoods. This practice raises awareness of NCs as venues for local policy conversations. In addition, it pushes the recruitment of youth NC board members, who not only add new and different perspectives to NCs but also bring energy and effort to conduct community improvement projects (City youth worker - 04cs).

Furthermore, as the substantive value of community input has become apparent to City stakeholders, ELA has been increasingly plied to conduct outreach on City initiatives to NCs and their communities on behalf of City departments. Opinions vary within ELA on whether the department should serve as the “community outreach arm” of the city. Some see this as a core part of the ELA mission while others see it as a part of each department’s individual responsibilities, more easily supported in the budgets of departments many times ELA’s size (ELA staff member - 01d). Ultimately, ELA stakeholders believe this work is essential to promoting the NC system as a resource for City departments, and are therefore hesitant to decline to assist with its outreach. Furthermore, aligning NC system outreach with the efforts of elected officials or other City departments, who are working on visible community improvement projects, raises the profile of the NC system and confers legitimacy on the system. However, because this responsibility has become logistically burdensome, ELA has been working to develop more efficient
ways to support the city's needs while remaining focused on its own mission of supporting NCs (int01d).

**Community Impact Statements.** Community Impact Statements (CIS) are part of a feedback system through which Neighborhood Councils can present official positions on issues or actions being considered by the City Council. CISs provide a proprietary means to voice support or opposition to pieces of legislation or other City actions. After being registered with the City Clerk, CISs are printed on the City Council agenda for members of City Council and the public to see. ELA developed this system in order to uphold Charter language stating that NCs would have “the opportunity to provide input before decisions were made” (CH. 907), with the ostensible intended outcome that elected officials consider neighborhood positions in their district when taking a vote.

Given that participation in government and soliciting government responsiveness are the core elements of the NC mission, and that there is anecdotal evidence that elected officials take guidance from vocal constituencies, ELA has strongly encouraged NC participation in the CIS program. Much like other outreach efforts, ELA pushes NCs to weigh in on particularly topical policy issues, including proposed changes to the Greek Theater operator, DWP rate adjustments and homeless services, as a way to drive participation. As already mentioned, ELA has begun circulating a legislative summary to its NC mailing list. This summary explains potential impacts of proposed City actions in lay terms in an effort to make it easier for NCs to submit community impact statements.

In the three years since its implementation, roughly 300 CIS’s have been submitted per year. It is important to dissect this number.
Table 7 – Neighborhood Council CIS submissions

<table>
<thead>
<tr>
<th>CIS submissions</th>
<th>NCs</th>
<th>CISs</th>
</tr>
</thead>
<tbody>
<tr>
<td>CIS submission = 0</td>
<td>19 NCs</td>
<td></td>
</tr>
<tr>
<td>CIS submission &lt; 4 (1 per year)</td>
<td>41 NCs</td>
<td></td>
</tr>
<tr>
<td>CIS submission &gt; 20 (5 per year)</td>
<td>19 NCs</td>
<td>730</td>
</tr>
<tr>
<td>CIS submission &gt; 40 (10 per year)</td>
<td>7 NCs</td>
<td>377</td>
</tr>
<tr>
<td>Total CIS submissions (FY14/15 – FY17/18)</td>
<td>77 NCs</td>
<td>1166</td>
</tr>
</tbody>
</table>

From Fiscal Year 2014/15 to Fiscal Year 2017/18, while 80% of NCs have submitted a CIS, 62% of submissions came from 19 NCs (20%), and 32% came from just seven NCs (7%). This suggests that NCs have differential access or differential interest in utilizing the CIS system. The CIS submission system has also been fraught with operational challenges, with submission timelines being undermined by cumbersome process for taking a formal position, as well as technical issues, with some NCs erroneously believing they had submitted a CIS through the Clerk portal in time to be included on an upcoming agenda. Furthermore, it is unclear whether Community Impact Statements affect the decision-making of elected officials, with some elected staffers expressing ignorance on what community impact statements are, let alone valuing or being swayed by the community voice they express. Finally, some NCs do not utilize CISs because they do not believe they are a useful tool in meeting their local community needs. Instead, these NCs focus on other means of expressing their positions to elected leaders, or invest their energies in other priorities such as community education and outreach.
Evolution of ELA’s Substantive Policy Differences Boundary Practices

**Organizing.** Outreach processes have evolved dramatically since the establishment of the NC system. Early in the formation process, participation outreach took the form of community organizing: identifying local community leaders, soliciting their buy-in for the partially formalized NC entities, asking their help in identifying other local leaders, training them on how to form and operate a Neighborhood Council, and how to effectively advocate to City leaders for their local interests. This early outreach practice drew on ELA staff experience and their ties to the communities in which they work to foster connections (ELA staff member - 10d).

Because the NCs are now largely established, ELA’s outreach practices have pivoted away from forming NCs by organizing neighborhoods towards promoting and marketing the presence and role of NCs (ELA staff member - 05d). Both of these outreach practices emphasize increasing community participation in the NC system to convey local needs to City government. Some, both within ELA and among NC stakeholders, express concern for the emphasis on digital outreach, which in the worst case does not reach stakeholders with barriers to social media, such as age or finances, and in the best case lack the same connection offered in face to face interactions (ELA...
staff member - 12d). Furthermore, ELA staff and NC participants lament the shift away from organizing, which can better identify, connect with, and recruit community leaders than the more passive approaches of media outreach, which may not even reach some of the most important local figures. On the other hand, some ELA staff have also acknowledged that ELA-led community organizing efforts are often viewed as an effort to undermine and supplant existing NC boards, and that this perception along with the massive demands on staff time have contributed to curtail organizing as a form of outreach practice.

**Elections.** As part of a more issue-oriented or campaign-oriented practice of outreach, ELA has increasingly aligned outreach efforts with the NC elections process (int03d). NC outreach around elections can identify prospective NC board candidates as well as prospective voters among local community members. Because sitting NC boards are incentivized to minimize election outreach to preserve their seats, ELA has taken a more direct role in this type of outreach by advertising on City bus shelters and benches, City streetlight banners, as well as through digital advertising on social media.

Some system stakeholders, however, express skepticism that elections are the best way to conduct outreach for enduring participation. They argue that a more continuous approach to outreach will cultivate sustained involvement, as opposed to the resource intensive periodic approach focused on driving participation in election voting (BONC member - 03ss). Moreover, because voter turnout in NC elections serves as a departmental performance outcome for ELA, some NC stakeholders express cynicism towards ELA’s elections-oriented outreach. Focusing on voter turnout numbers, they suggest, does not necessarily translate to successful recruitment of
candidates who will serve well as board members, or reflect engaged voters who are well-informed on local issues.

**Alliances.** Alliances are NC collaborations that organize to work on shared issues either by region or by topic. NC Alliances were not an ELA initiative, but were, in fact, created and pushed by NCs themselves over the early objections of ELA. However, Alliances have become a central boundary structure in outreach for substantive policy work. There are regional alliances: South Los Angeles Alliance of NCs (SLAANC), Valley Alliance of NCs (VANC), Westside Regional Alliance of Councils (WRAC), Alliance of River Communities (ARC), and Harbor Alliance of NCs (HANC), as well as topical alliances such as Emergency Preparedness Alliance, and Plan Check Alliance which focuses on land use issues across the city. Alliance participants typically reflect the most active board members from the member NCs. Since their emergence as powerful organizing units, ELA has prioritized connecting City stakeholders to NC alliances, a “captive audience” of NC stakeholders who typically function with more interest and technical capacity than individual NCs, and which can disseminate information back to a larger group of individual NCs that they represent (int08d). In one instance, a City staffer made a presentation to an Alliance seeking to raise awareness of the Ban the Box campaign to improve accessibility to City jobs for prospective City workers with prior criminal convictions.

Similarly, Alliances can work quickly on issues, having nuanced discussions and hammering out policy recommendations to take back to individual NCs, because they do not have to dedicate time to the administrative tasks necessary at typical NC board meetings. Due to the freedom from administrative constraints, more regular presence of City stakeholders, such as representatives
from LAPD, local schools, and elected offices, as well as the higher aggregate technical capacity, NC stakeholders prioritize working in the Alliance setting.

**Major Findings and Summary**

Neighborhood entities and City entities frequently have different views on public policy. In particular, City entities tend to take a citywide view of policy issues, where neighborhood entities are more concerned with the urgent matters directly affecting their communities. When both groups participate in policymaking venues, their differing perspectives and priorities can result in misaligned expectations and conflict. However, contrasting perspectives also allow these entities to provide different strengths in the policymaking process. City entities can take a holistic view that accounts for citywide concerns and provide expert training and knowledge about City processes, while neighborhood entities can bring their local knowledge and substantive expertise to create better-informed policies.

ELA functions as a boundary structure in mediating contrasting perspectives and priorities on policy between the City and NC system. Policy boundaries coalesce in two areas: citywide versus local perspectives and substantive differences on specific policy. ELA engages in boundary practices to address each. ELA’s citywide/local boundary practices include connection, translation and interpretation, training and capacity building, departmental liaisons, and the Civic University program. ELA’s substantive policy boundary practices include outreach and Community Impact Statements. These boundary practices have evolved over the lifespan of the department in response to increasing baseline capacity of NCs, more sophisticated NC self-organization, and technological advancements. Connection practices have also evolved in response to emerging political activity of NCs and stronger direct connections with City leaders.
ELA and NCs face continued challenges in the policy making domain moving forward. The boundary between citywide and local perspectives cannot be bridged by consensus. Thus, policy matters will always involve disagreement and, in productive circumstances, compromise. The challenge for both City and NC stakeholders will be to understand disagreement as a productive dimension of policymaking and not as pointless conflict or dysfunction. The antagonistic stance between City and neighborhoods from the outset and the ongoing struggle for power between elected officials and NCs will likely contribute to an approach to policymaking as a mutually exclusive enterprise. This orientation risks reinforcing perceptions of policy disagreements between NCs and City stakeholders as a reflection of NC dysfunction. Policymaking impact and political power among NCs depend on their ability to not only embrace productive disagreement, but also to convey its important role in democratic governance to City stakeholders as well.
Findings: Organizational Boundaries and Boundary Practices

Part of it is that the mission is like so at the opposite extreme from like administering City processes. You know, it’s like community building and you know flexibility, accommodating everybody. And the City systems are, like, following the rules, and not getting in trouble and staying out of the newspaper, you know? The complete opposite […] their job is to open the flood gates and introduce chaos into our system. (City administrative staffer - 07cs)

The City needed to parent the Neighborhood Councils, which is enough rules that the kid doesn’t drive off a cliff, and not so many rules that they can’t grow. Now, that’s a pretty rare thing in government, honestly. (Charter reform participant - 05ss)

Purpose

This chapter presents the boundary relationships between the Neighborhood Council system and the City in the arena of organizational process, describes different types of organizational process boundaries between City and Neighborhood Councils, identifies some of the problems that arise in these boundary relationships, describes how ELA manages these organizational process boundary relationships, and how ELA’s approach has evolved over time. The chapter begins with a description of how Neighborhood Councils and City entities interact through processes. This discussion presents how these different entities function according to different process models, and describes which of these differences leads to tensions in relationships. This chapter continues with an examination of three noteworthy process boundaries: 1) the City bureaucratic system, 2) centralized versus decentralized process models, and 3) City staffing processes. Governance, operational and political problems resulting from these boundary contests are then presented, followed by examples of what boundary practices ELA has employed to mitigate or resolve these problems. Each section ends with a discussion of how ELA’s boundary practices have adapted to problems arising from the evolving process boundary relationship between City and neighborhood stakeholders over the last 17 years.
Introduction: Process Boundaries

Figure 9 - ELA process boundaries, practices

Codes under the process theme also reflected two boundaries: city bureaucracy and centralized vs. decentralized process differences, and fell within five boundary practice subcategories. The city bureaucracy boundary had three subcategories and the centralized vs. decentralized boundary had two subcategories. The process findings suggest that the most activity is concentrated among boundary practices that carry substantial challenges, including major external constraints like funding or organizational structure. This may reflect attention to activities that have experienced disruption, and lesser prioritization of activities that are taken for granted.

Boundary: City Bureaucracy

Part of the gulf between NCs and the City is due to their distinct organizational processes. As a Progressive Era bureaucracy, the City is designed to function in a stable and consistent manner. The purpose of this form of government service design was to insulate the City
institutions from the ills of political corruption and the influence of machine politics. Many of complexities of the City bureaucracy are either descended from or directly attributable to Progressive Era reforms. Furthermore, the City Charter 1925, established the Mayor-Council-Commission as a purposeful effort to prevent executive corruption by diffusing governing responsibility. Thus, the inefficiency of the bureaucracy itself serves as a check on concentrated power and its potential for abuse.

That’s part of what we had to learn was LA political culture. [It’s] like talking about how New York came to be. 1898, so we were already cognizant of all that stuff and how New York, you know, came to be. But we had to learn about the Progressive Era reforms that occurred at the turn of the century 1900 to the twentieth century that that occurred, which knocked out patronage, which created this commission system of government which is ridiculous. As far as we’re concerned, why the fuck does a department need a board of directors? The Mayor is, that’s what the Mayor is for! To give direction.” (Charter reform participant - 09ss)

By design, a bureaucratic system is meant to absorb input over time, design policy interventions centrally with its in-house experts, and then implement them slowly and with minimal input from the end user. However, as a result, this means city institutions are slow to change, and largely unable to respond to exceptional needs or circumstances. In a rapidly changing city like Los Angeles, where changing social and economic conditions lead to new and different problems, and emerging constituencies have new and different demands, the disconnected bureaucracy and its dispassionate service provision frequently leave community stakeholders dissatisfied. Bureaucracy is administered according to strict rules and highly prescribed guidelines to enforce transparency and accountability. Rules prescribe exactly how city processes are to unfold, what the organizational structures are that support them, what process timelines should be, and who has decision-making power. These rules minimize uncertainty in city
processes so that if delays occur or unexpected decisions are made, processes can be reviewed to ensure that no errors or unethical behavior have influenced City services. Rules and guidelines also serve to protect the city from liability for any potentially irresponsible behavior by its employees.

NC stakeholders, on the other hand, function according to practical expediency. As volunteers balancing other obligations, NC stakeholders often to not have the time to dedicate to City processes that are not only tedious to execute but also tedious to learn. These processes include elections candidate and voter registration, City conflict of interest documentation, meeting agendas, financial reporting, leasing, vendor solicitation, meeting management, bylaws revision, and Brown Act compliance, among others. Furthermore, NC stakeholders feel that their role is to keep pace with happenings in the neighborhood and to respond as necessary, sometimes at a moment’s notice. Bureaucratic rules are designed to run efficiently across baseline conditions, and are specifically designed not to be responsive to exceptional circumstances. Thus, for NC stakeholders the City bureaucracy functions as an obstruction, and the City’s governance problems reflect a bureaucratic management issue rather than a political issue.

[...] with anything, you need a strong leader. And... and maybe that’s impossible in the City. But my perspective, the biggest problem we have in the City are not the unions, which are a problem, you know all the compensation, it’s a lack of good management. And it’s a lack of a good organization.”  (NC board member - 04nc)

NC stakeholders are not the only ones to critique bureaucratic intransigence as an approach to City management. Some City stakeholders also take issue with the argument that bureaucratic management brings transparency and accountability. Instead, they argue that transparency and accountability is a means to achieve “good management,” and the role of bureaucracy itself is up for debate.
Transparency for me is not the end in and of itself. It is the means to an end, the end being a much better run city, and a much more accountable [city]. So the transparency by itself does not achieve those things, but I think it’s sort of a necessary prerequisite. (City elected official - 06cs)

Finally, the technical expertise from which bureaucracies draw their operational legitimacy can have negative effects on implementation. In some cases, well-trained and experienced City bureaucrats have taken a tautological view of their expertise, and have dismissed the testimony and on-the-ground intelligence of neighborhood advocates. This has led NC stakeholders to resent so-called bureaucratic expertise as an additional front of City resistance to neighborhood contributions to City processes, and an effort to undermine the NC system’s role in City governance overall.

It’s not casual, there’s resistance at every point. “I am so smart that no one should meddle with me when I’m doing $600 million worth of spending, because I’m a genius! I’m the guy! Responsible for $600 million!” So you see it, I don’t think it’s ingrained and that was my point in a long roundabout way. (ELA staff member - int03d)

Differing perspectives on the role of bureaucratic processes in governance, and differing abilities to navigate them, has led to problems integrating the NC system into City processes. The boundary relationship between City and NC stakeholders on bureaucratic processes features confusion about processes, frustration with process timelines and workflow, disagreements over appropriate flexibility, unanticipated issues pertaining to incompatible system requirements and system needs, and difficulty adhering to highly detailed rules.

Confusion about how to navigate City processes is a recurring theme. Many City processes, particularly recordkeeping and financial processes, have been developed over decades and have been slow to update as City departments have been re-organized or upgraded their internal technology systems. Furthermore, many City processes were designed for and are
maintained by internal professional audiences rather than members of the public. As a City department, ELA must comply with City processes for recordkeeping and financial accountability; as quasi-city entities, NCs also must comply. However, for NC participants and other City outsiders, City processes are unintuitive, intricate, and do not reflect their work.

Because some things are created from years of City people just doing it and they’ve never gotten public input for it and so now you just have this way this bureaucracy of something and when you start asking them: “Why? Why would you do it this way?” Like they can’t they can’t defend it you know? So that does create weird feelings. (ELA staff member - 01d)

Bureaucratic Rules. As quasi-governmental groups, NCs are required to observe city rules regarding the format and posting of their agendas, public notification of their meetings, how they manage their funds, and how they conduct their board elections. Some of these requirements are more burdensome than others. If a meeting is held without proper notification then any decisions made could be invalidated or the city could be held liable for a Brown Act violation. Sometimes NCs are required to redo any decisions made during an invalid meeting. “So basically you need to do everything over that you did in this meeting, so that’s what’s going to happen if you continue down this route” (ELA staff member - 01d). Yet, the Brown Act’s requirements for public notification of meetings not only pose an obstacle for NC stakeholders, but also lag behind contemporary norms of communication. If a group of board members participate in a conversation on an online message board, they must be vigilant that less than quorum are involved to avoid Brown Act violations in the form of serial communication or a non-public meeting. Not only is this not how people engage in social media behavior now, but in the view of local stakeholders, it undermines what is otherwise an engaged and productive community conversation. These inconveniences sometimes result in NCs taking measures to circumvent
Brown Act requirements for the sake of expediency. In their view, if Brown Act requirements impede transparency more than they enable it, then they are better serving the community by working around it. However, if these “rogues” are caught by ELA or the City Attorney intentionally circumventing the Brown Act, they can be punished or even decertified as a council. This tension is ever present in dealings between NCs and ELA and the working relationships between NCs and ELA staff are as often characterized by mistrust as collaborative enthusiasm.

At times, the efforts of ELA to better serve the NCs are undermined by bureaucratic rules. Field staff are not permitted to check email on their phones or home computers and are therefore only able to access their email on City computers in the office. However, because of the field-based nature of their work, some field staff are unable to go into their office for several days at a time. This contributes to an additional communication barrier between ELA and NCs, and encapsulates how rigid bureaucratic rules undermine ELA’s ability to effectively serve the NC system.

**Incompatible City Processes.** Because of the unique characteristic of the NC system, many City bureaucratic processes are not setup to meet NC system needs. This is especially the case for rules for working with third party vendors. For instance, ELA has struggled to find a banking vendor through which NCs can manage their funds. Unlike typical city departmental banking accounts, which involve large sums of funds, with a tight command and control structure for who may have access to funds, the NC system involves a large number of smaller accounts with hundreds of individuals with varying degrees of access. Large commercial banks simply do not have account structures that are meant to blend the convenient access of retail banking with the oversight and accountability measures of a city department. This puts pressure on ELA to contract
with vendors that may not have a perfectly suitable product and attempt to overcome oversight
and access challenges internally. It also means that for some services ELA is constantly negotiating
for a customized product or searching for a better one, which ultimately keeps NC system financial
processes in a constant state of uncertainty.

**Bureaucratic Timelines.** Stringent requirements for notifications and reporting exacerbate
NC challenges with timelines and workflow. NC Monthly Expenditure Reports (MERs) must be
approved by the NC board and submitted to ELA to be approved as part of the city accountability
measures governing NCs. If an MER is submitted with an error, or a missing signature, or an
unapproved expense, ELA will return it to the NC to be corrected, re-approved, and re-submitted.
However, because of standing meeting schedules, public notification requirements and the general
busyness of volunteer NC board members, convening a board meeting to re-approve the MER may
not be possible in a short amount of time. As a result NCs regularly fall out of compliance with
MER submissions. This can lead to corrective actions such as frozen funds or exhaustive efforts,
which can disrupt planned neighborhood events and alienate vendors who provided services in
good faith. Although some of these problems with document submission certainly reflect NC
board dysfunction or willful efforts to misappropriate City funds, NCs have been forced into non-
compliance by restrictive timeline mandates.

Similar to how MERs highlight timeline incompatibilities, NC agendas and City agenda
posting requirements highlight the workflow problems at process boundaries. City agendas
require a specific format, and errors in content or format by an untrained or inattentive board
secretary must be corrected before a meeting is considered properly notified. The approximately
4000 agendas produced annually by the NC system is the majority of the public agendas produced
by the entire city, and is utterly overwhelming for a single ELA staff person to review and clear in real time. This bottleneck frequently results in late responses to NCs and, ultimately, cancelled or delayed meetings, or a flurry of last minute corrections demanded of NC stakeholders.

NCs are ill-equipped to operate according to the timeline and workflow constraints of the City’s bureaucratic processes. NCs depend upon volunteers to conduct their business, often working around the demands of their work or families. Many of these board members already allocate significant time to working with their NC and taking on unanticipated work leads to frustration, and that the additional work stems from bureaucratic process issues with the City rather than the actual policy or outreach or service work on behalf of their community draws additional ire. NC stakeholders feel that the effort required to adhere to bureaucratic processes has subverted the mission of the NC system, which feeds into the grievances that led to the development of the NC system in the first place. “And so [City bureaucrats] laid out a whole set of things that would be required, that brought a procedural coherence but an organizing incoherence to the system” (NC Review Commission participant - 05ss).

Beyond the operational process work, NCs’ policy work also interfaces with the City bureaucracy. For instance, the Early Notification System and the DWP rate change policy both communicate proposed policy changes to NCs in advance. Ostensibly, these notifications are sent out so that NCs can discuss and digest policy changes that would affect City residents and ratepayers and provide their feedback to policymakers prior to any changes going into effect. However, providing feedback is an involved process for NCs, and may include multiple committee meetings, a board meeting to introduce the topic and then another board meeting to pass a resolution. Add to these whatever length of time it takes for a proposed change to be analyzed by
the NC, the DWP Ratepayer Advocate, or another third party, and providing feedback to policymakers may take months, missing deadlines for providing input in the process.

Furthermore, both the usefulness and the legitimacy of the NCs’ feedback is drawn from local community knowledge. Participation and inclusion of community stakeholders requires more flexible timelines. Rigid bureaucratic process deadlines mean that stakeholder feedback is either incomplete or not fully fleshed out, or that stakeholder feedback is simply not included further alienating community stakeholders from participating in the processes in the future. The onus is squarely on NCs to overcome the hurdles with bureaucratic timelines. Failure to do so, typically means the City moves on without stakeholder input.

Internal NC Processes. Unresolved disagreements over the appropriate role of NCs and over how to implement their formation has contributed to role confusion on the part of Neighborhood Council participants. Eighty five of the now 96 Neighborhood Councils were certified from 2001 to 2004. During that time, in an effort to empower NCs as self-sufficient entities, ELA leadership did not impart more than minimal guidance in the writing of each NC’s bylaws. As a result, apart from a few basic elements such as number of board seats and the delineation of geographical boundaries, there is little commonality among NC bylaws across the system. Even the manner in which NC seats are selected is not uniform: not all NCs use elections, those that do use a variety of different candidate and election rules, and, until recently, few NCS held elections on the same day. The complexity of elections rules were exacerbated by their obscurity: few board members, NC participants, or other prospective voters were involved with writing the original bylaws or have ever even read them.
The 2016 election season was marred by prospective NC voters finding themselves unexpectedly ineligible to vote, candidates disqualified for running for the incorrect seat, and problems with collecting documentation both for in-person and online voting. Additionally, 2016’s elections were largely overseen by the Clerk’s office, which takes a rigid and uncompromising approach to managing elections, as could be expected from the public entity responsible for all other local elections. These problems were exacerbated by ELA’s difficulty managing the confusion and ultimately resulted in broad voter dissatisfaction with the elections process. Many of these issues were a direct result of obscure and highly restrictive voter eligibility and elections process requirements inscribed in individual NC bylaws, of which current and prospective NC participants are largely unaware. The Clerk’s office enforced these rules to the letter, which was a departure from the more understanding and NC-first approach used by ELA in the past. In the case of the 2016 elections, the result was broad dissatisfaction with the election process, loss of confidence in ELA’s ability to oversee elections, official challenges to election results, complaints about the challenge process, embarrassing media coverage and reflected poorly on the legitimacy of NCs as part of the City governance structure.

ELA Problems. Because of the NCs’ oppositional relationship with ELA and the City Attorney on matters of bureaucracy, the intransigence of the City to alleviate some of the challenges bureaucratic requirements pose to NCs, and the swift punishment meted out for non-conformity, some community members react to the City bureaucracy less as a matter of inconvenience and feel that the City actively uses bureaucracy as a weapon against local communities. Some NC stakeholders feel that the City uses bureaucratic rules to silence NCs and avoid dealing with their issues. Some NC stakeholders feel that the City simply humors the NCs but
basically ignores them, and hides behind bureaucratic systems to avoid being transparent with community stakeholders. Finally, some NC stakeholders feel that even if the City has the best interests of the NC system at heart, bureaucratic systems by their very nature stifle innovation and thereby undermine NCs’ efforts to change troublesome dynamics in their communities. These feelings manifest as views of ELA as “the enemy” (int05cs) and a general unwillingness to work with ELA, an extremely counterproductive approach given ELA’s role in NC system administration. Thus, bureaucratic processes represent a major boundary between the City and NC stakeholders.

**ELA Boundary Practices: Bureaucracy**

Confusing, burdensome, and tortuous processes have presented a major barrier to NC participation and have undermined NC functioning and trust. The scope of processes involved in running a bureaucratic system and the degree to which they affect the NC participant experience, their ability to execute their work, and the legitimacy of their role in governance, has required that the ELA expend considerable attention and energy to bridging bureaucratic process boundaries. ELA’s bureaucratic Boundary Practices include streamlining processes, creating structure and guidelines for NCs, fostering continuity, and fostering innovation.

**Streamlining Processes.** In an effort to reduce the time both NCs and ELA staff spend on routine processes, ELA has invested considerable effort in making bureaucratic processes more accessible, intuitive, and concise. Paying bills, which as recently as 2013, required a stack of hard-copies of forms with original signatures to be submitted monthly, now only require the submission of a short online form. The online form allows requests to be submitted instantaneously, rather than be mailed or delivered to ELA to be reviewed. Furthermore, the digital form cannot be submitted without all of the fields being filled out correctly, which eliminates a potential lengthy
back and forth between ELA and NC to get the forms submitted correctly. In this case, new technological platforms available to ELA and increased stakeholder access to digital networks has facilitated a technologically-driven streamlining of bureaucratic processes.

Another source of bureaucratic headaches has been individual NC bylaws. Each NC’s bylaws establish, with varying degrees of rigidity and continuity, how NCs select their board members and how NCs operate on a day to day basis. Because many of these documents were written over a decade ago, before the NC system had a chance to work out potential operational glitches, many NCs use bylaws that were designed in a different context and do not allow NCs to function according to contemporary needs and conventions. In addition, the details of bylaws are often unfamiliar to NC participants and community stakeholders, who become frustrated when they find themselves constrained in unexpected ways, such as during candidate and voter registration for elections. However, changing NC bylaws is a cumbersome task. One method involves an NC board re-writing their bylaws in public view and then sending their proposed changes to be reviewed by ELA and the City Attorney, before ratifying them. This can be a high threshold to passage due to the political challenge of getting NC board support, allaying the concerns of community stakeholders, and also meeting the legal expectations of the City Attorney, and the logistical needs of ELA. Furthermore, there is a limited window in which bylaws can be changed between elections to prevent maneuvers designed to serve political interests of sitting board members. All of these factors create a challenging process for changing dysfunctional bylaws.

ELA tries to facilitate changing bylaws in keeping with this formal established process as much as possible. However, for some NC boards, their own dysfunction may serve as a barrier to change. Exhaustive efforts (EE) is an ELA power that is used to intervene in dysfunctional NCs, such
as those which are not meeting regularly, are not submitting their financial documents, are not properly notifying the public of their meetings, or are taking illegal actions. EE typically involves several months of consultation with ELA staff, working closely with NC board members to evaluate what sort of intervention could lead to improvements. These interventions include additional capacity building trainings, and more direct assistance with clearing backlogs of forms, but also allows ELA to appoint and fill board seats, make alterations to bylaws unilaterally.

The unilateral nature of that ELA’s use of EE is controversial. EE’s ability to cut through bureaucratic red tape and overcome NC dysfunction is a powerful instrument in the hands of a boundary organization charged with negotiating the needs of individual NCs and the overall health of the NC system. On the other hand, EE supersedes the self-directed processes of NC boards, which is rightfully of concern to NC board members whose powers, rights and responsibilities are essentially frozen for the duration of EE. Some board members sometimes view this as a power grab by ELA or community members who do not support their agenda and do not have the political support to elect different board members. However, regardless of any specific political agenda, EE does circumvent the spirit of the grassroots democratic process that supports the NC system, and thereby its legitimacy. Though ELA tries to use EE judiciously, some NC stakeholders would like to see it used more broadly and decisively to save NCs from their own dysfunction.

You have to put them in EE, change their bylaws, [and] restructure their seats. You know, get their shit together. And then show ‘em how to do it better. And you can’t be political. Part of the problem is management has to be political. “Oh, well we don’t want to piss off the Neighborhood Council...” Yes you do. You want to piss off the Neighborhood Council people, because they’re pissing off all their stakeholders. So now it’s time to put the blame where it belongs, you know and fix them. (NC board member - e01)

Another boundary practice ELA has used to resolve a process issue is instant runoffs in elections. For all of the reasons described above, NC elections comprise an enormous logistical
undertaking for ELA. Some NCs’ bylaws use runoffs to settle highly contested elections, where there may not be a clear winner or where no candidate meets a majority vote threshold. This adds an additional election event, in either the form of a primary or a runoff. The prospect of additional elections, which may be difficult for both ELA and the community to organize, was particularly onerous on a citywide scale. Thus, ELA piloted an “instant runoff” ballot, which allows voters in an NC to rank up to three candidates for a given NC board seat. ELA deployed this process in Palms during the 2014 election and sure enough none of the three candidates received 50% plus one of the votes. The third place candidate was eliminated and whichever candidate ended up with the most first and second place votes won the seat (Former NC election staff member - 05cs). This practice streamlined an unwieldy

**Structure.** Another boundary practice that ELA has used to bridge between the City bureaucracy and the NCs is developing more uniform structure for NC system. Because the architects and early proponents of the NC system prioritized self-governance as the basis for NC empowerment, they did not want to impose constraints on how community stakeholders sought to form an NC and conduct its business. As a result bylaws language, elections conventions, and board member capacities vary broadly across the NC system. Those same architects would argue that this diversity is a strength of the NC system; however, the accompanying inconsistency creates overwhelming administrative complications for ELA and NCs themselves. The role of ELA in governing the NCs were similarly undefined, both in the original charter and in subsequent ordinances. Uniform application of rules and procedures is undermined by staff transitions and, in particular, a massive staff reductions, which compromise ELA’s ability to execute their work in a timeline and transparent manner. Furthermore, in an effort to demonstrate that ELA’s support for
NCs is on a par with its responsibility to regulate their activities, and improve positive collaborative conditions between ELA and NCs, ELA management has fostered a culture of “find the yes,” which involves working with NCs to find a way to meet their needs that also achieves compliance, rather than dismiss unsuitable proposals that off-hand. This effort is complicated by the unique nature of NCs and how this system frequently presents new situations which are not considered or explicitly addressed in established rules. And while this approach certainly conveys a dedication to meeting NC needs it also conveys that everything is up for negotiation. This also puts pressure on staff to know and understand community issues, have a trusting relationship with NC board members, and exercise discretion in their adjudication of problems, and participate in a large volume of communication for every contact. For some NCs, ELA’s willingness to negotiate communicates weakness or incompetence. Ultimately, the loosely structured nature of the relationship between ELA staff and NCs results in more work and less confidence in administrative decisions.

I mean it’s really hard to tell someone: “You can’t do this.” And then they say: “Why not? Why can’t I do this?” And my answer is: “Within my judgment or read of the situation, you know…” They have to put a lot of trust in me [that] I have their best interests at heart. And to be honest, if they don’t know me or if they don’t think that I know what I’m talking about, I’m not as strong as a policy and procedure. You know, I am a person, and you either believe me […] It’s like if you’ve never met me before or you don’t have very much experience with me and I’m giving you advice, you don’t know exactly where that advice is coming from. You don’t know if that’s coming from 15 years of experience […], or it’s somebody whose technically only been out in the field for six months […] giving you their best read. (ELA staff member - 15d)

One major step ELA has taken to add structure and consistency to its administrative relationship with NCs is to divide up its roles and outsource some of its administrative functions to the City Clerk. ELA’s effort to maintain a positive working relationship with NCs and work as their advocate and ally has pressured it to avoid maintaining rigid rules and procedures, the City Clerk’s office excels at operating with highly structured and impassive policies and procedures. As of July
2016, ELA transferred the funding program and agenda submissions to the City Clerk’s office. This role division has allowed ELA to serve a more one dimensional supportive role, with ELA staff focusing more on technical assistance than enforcement. Although the obligations of NCs to adhere to policies and procedures remains unchanged, the role division also reduces confusion among all parties and increases confidence in ELA and the functionality of the system overall.

ELA has also begun adding additional internal policies and procedures. ELA staff are all required to use Quickbase, a shared database program that documents all communications with NCs, as well as actions ELA staff have taken to assist NCs. The resulting increased uniformity in communication and process also allows for greater transferability of work within the department, if an assigned staffer is out of the office, then a substitute is able to step in and address problems with minimal complication. Quickbase is not without its problems, as some staff have observed that the fields that categorize the type of NC issues and type of staff response are not sufficiently customized to fully capture accurate information. This may reflect an inherent tension between creating a uniform structure and meeting the nuanced needs of a diverse system of NCs.

Finally, ELA uses FAQ documents, process guides and walkthroughs for NC participants to more clearly communicate how administrative processes are supposed to unfold, expected or required turnaround times, and consequences for non-compliance. These resources include sample forms, text walkthroughs, online videos, regular in-person trainings, as well as an online trackers that allow NCs to see their status of their MER, lease and contract submissions. Although some of these resources have been available for years; however, the sheer volume of information they contain, frequent NC board member turnover, occasional alterations to policies and
procedures, as well as document location, organization and format, have made it difficult for ELA to convey this information and hold NCs accountable for knowing it.

**Innovation.** The unique nature of the NC systems and the diversity of its participants regularly results in new and different challenges to ELA’s and the City’s bureaucratic processes. However, its small scope compared to the City of Los Angeles, the relative flexibility of its staff, and potential for mobilization among its participants make it an attractive testing ground for City initiatives. From internal departmental interventions such as software investments like Quickbase, to system-wide governance practices, such as instant runoff elections, or online elections, ELA provides a venue for low-cost and limited-risk experimentation for the City. Furthermore, as a department that encounters unique problems, and maintains some operational flexibility to overcome staffing limitations, ELA management depends upon innovative solutions to the problems it encounters.

ELA leadership has argued that training staff to identify process problems and take the initiative to resolve them is important not only from a service delivery efficiency perspective, but in order to maintain community trust in ELA’s mission to support NCs. Since 2013, ELA has been sending staff to participate in the Peak Performance training series offered by the City. Peak Performance, also called Blackbelt or Greenbelt training, is a training program designed to empower front line workers to identify problems with city processes and to design proposals to resolve them. The Peak Performance training series is to spark innovation at the ground level where workers are most familiar with how government processes play out rather than trying to conceive of abstract innovations in a vacuum at a more removed policy level. The original premise of Peak Performance innovation training was to save the City of Denver money by reducing the
wasted time of City workers during a financial crisis (Elms & Wogan, 2016). However, the training program also been cited as a model of innovation in city government, increasing usage of City services, reducing the frustration of city residents, and improving trust. Facing a similar financial crisis, in which regular staff were reduced to 18 from a high point of 68 just a few years prior, ELA has turned to flexibility and innovation as a way to address needs left unmet by the loss of workers.

Leasing office space has presented a burdensome bureaucratic process for NCs over the years. Although NCs are required to meet regularly, many have access to public meeting spaces and do not bother with leasing space. However, some particularly active NCs prefer to have an office to store their documents, host small meetings, house a phone line, computers, and other basic office activities. Not only does leasing comprise a formal contract between the City of Los Angeles and a third party, but when used for NC purposes the rented space becomes carries all of the public access considerations of public spaces and must be ADA compliant. Thus, the leasing process long involved several rounds of approvals, including sign-offs from the City Attorney and the Council District office, site-inspections from Department of Disability, and ultimately a City Council action to finalize the lease. Furthermore, a single person in the City attorney’s office was responsible for signing off on leases, and if they were unavailable out for any reason, the whole process would grind to a halt and there was little anyone else could do to help. This process took on average between six months and a year to complete, which made it difficult for NCs to lease space as few landlords were willing to keep space available for this long process to unfold.

One ELA staffer, having gone through the Greenbelt training zeroed in on the leasing process as a serious problem in the bureaucratic process. She mapped out each of the steps in the process
and looked for places where the process could be shortened. She found that the Department of Disability was willing to develop a fact sheet to help guide NCs in their selection of spaces, accept photographs of ADA fixtures and conduct inspections to confirm compliance after leases had been signed. Furthermore, the ELA staffer proposed a backup signatory in the City Attorney’s office, in case the primary staffer was unavailable. Finally, the ELA staffer determined that due to the modest expense of the leases City Council approval was unnecessary, and that removing the council agenda scheduling process cut months off of the timeline. Ultimately, mapping, reviewing, proposing and proposing reasonable changes to the leasing process reduced the lease approval timeline from six months to a year down to two or three months.

Another innovation ELA has pushed is a meeting agenda formatting digital service Novis Agendas. As public notification documents, NC agendas require specific formatting and informational details, such as ADA language, to maintain Brown Act compliance. Errors require multiple ELA staff, an agenda coordinator and the project coordinator assigned to a given NC, as well as NC time to resolve; more than an entire FTE of staff time over the course of 4000 annual agendas, and likely even more uncompensated NC volunteer time. The Board of Public Works and City Council already use Novis Agendas, but its adaptation for the NC system would not only offer savings in staff time but also help streamline an unwieldy bureaucratic process for NCs. An automatic agenda formatting system, which would allow NCs to fill out fields and have the legally required elements of agendas to automatically populate would save the cost of an entire staff position per year.

The 2006 Neighborhood Council Review Commission (NCRC) found that the communication transparency requirements of the Brown Act may not effectively accommodate 21st century digital
communication norms and inhibit some useful communication venues for NCs. Furthermore, the volunteer nature of NCs are not well-suited to the rigorous administrative obligations of complying with the Brown Act and, similar to formatting agendas, they have consumed a significant proportion of staff and NC time. The NCRC proposed a Sunshine Ordinance that would allow for an alternative system to ensure public transparency, for quasi-governmental community based organizations like NCs. Although the 2006 NCRC Sunshine ordinance was never adopted and there is not consensus on the specifics of how notification and transparency should be ensured, broad support for a “sunshine ordinance” or alternative transparency measure remains.

**Evolution of Bureaucracy.**

**Increased uniformity and structure.** ELA’s approach to bridging bureaucratic boundaries has evolved substantially over the years. Bureaucratic boundaries affecting the NC system’s administration are largely interrelated and thus alleviating them has involved reforms on multiple fronts. When the NC system was established, the highly structured City bureaucracy did not structure to how NCs would operate, causing uncertainty for how NCs would interface with the City bureaucracy. Furthermore, role ambiguity for ELA, as both chief advocate for and chief regulator of NCs, caused uncertainty for how unstructured NCs would be administered. Thus, during the NC system’s rapid growth in the early years, when the administrative complexity of the system was beginning to grow by orders of magnitude, ELA had to design on the fly the institutional practices that governed the administration of NCs as well as the bureaucratic relationship between NCs and the City.

In my view [...] they struggled with role definition. And... some of the Neighborhood Councils did very well, some of them did very poorly. And the ones that did poorly, contributed to a very bad reputation at City Hall, which certainly fit in with those who had always thought they were gonna be crazy anyway. (NC Review Commission participant -
During the first few years of ELA, few policymakers prioritized working with the NCs or pressured City departments to do so. As a result, the direct relationship between the NC system and the City apparatus remained unacknowledged and undeveloped. In addition, at this time, ELA was able to grow in size commensurate with the growth of the system, to an eventual capacity of 68 staff. As a result, ELA had the bandwidth to administer the system on an ad hoc basis due to a staffing ratio of nearly one field staffer per five NCs. Thus, even if the bureaucratic structures to oversee NC funding and governance were informal, disorganized, and unenforced, ELA could provide enough staff attention to overcome inefficiencies and keep the system functioning at a basic level. However, these constraints did not allow for ELA to invest as much time, energy, and resources in capacity building with NCs, and many were left to do that on their own.

The processes challenges presented by lack of uniformity were exacerbated by the role of the City Attorney in how ELA administered the NC system. Because so few operational policies and procedures were initially developed to guide NCs, the City Attorney’s office would frequently weigh in on NC proposals and evaluate whether or not they posed a liability risk to the City. The result of this real-time ad hoc practice was the writing of countless legal memos on specific NC activities. These memos were directed to ELA staff, who were then responsible for conveying their findings to NCs. However, these memos from the City Attorney’s office were so numerous and specific in their focus on individual cases that they not only failed to provide a unified understanding of what was allowable for NCs to do, but it increased confusion among NCs and ELA staff alike.
Furthermore, these memos did not typically cite the Charter or the Administrative Code, nor did they typically include explicit cease and desist orders. Rather these memos served as recommendations to NCs that their activities could be legally challenged, posing a legal risk to the City, NCs, and their board members. The City Attorney’s office, through ELA staff, also implied that NCs that did not comply with their policy recommendations may forfeit legal defense by the City on their behalf. As a result, NC behavior was governed by an assemblage of disparate legal memos and implied personal liability rather than a codified set of policies and procedures. This process also inserted City Attorney review as an essential phase of NC administrative processes, which caused procedural bottlenecks and delays.

The City Attorney, who at one time was in all the City Council meetings to give them legal advice, [X] came to call him Dr. No because any time you came up with an idea of something you wanted to do, the City Attorney’s representative was always there to give you reasons why you couldn’t do it or shouldn’t do it. […] It was, and City Attorneys still do this, an over-abundance of caution [to] protect the City from liability, right. […] Yeah I guess skate parks in a City park, think of the liability there. But you do it, you create the skate parks because you weigh one thing against another. You weigh the risk versus the benefit. And no one ever would have those discussions with the deputy City Attorney in a Council meeting. It was always like “Well, if you do this then there’s a risk of we’re gonna get sued…” and the City Attorney would always play that risk card with the Neighborhood Councils anytime they wanted to do something. (Charter reform participant - 07ss)

The Neighborhood Council Review Commission evaluated the NC system in 2007 and found that NCs were spending a large proportion of time on administrative and bureaucratic demands in comparison to policy deliberation and community activity. The NCRC recommended that ELA adopt more consistent policy and procedures to provide a supportive structure for NC operations, while largely maintaining their individual autonomy to conduct substantive work. Increased uniformity would simplify the administrative support processes and relieve ELA’s administrative burden. Uniform structure also offered NCs a more stable relationship with ELA, allowing them to better anticipate which processes would be rigid and routine and which
processes would be more flexible. Moreover, making these changes aligned with efforts to
develop a persistent positive relationship with City Hall, a challenge when NC and ELA
administration was compromised by disorganization and ad hoc decision-making.

The financial crisis undermined ELA efforts to formalize policies and procedures. In 2010,
ELA experienced a 58% staffing cut. As a result, ELA lacked the staff bandwidth to re-organize how
the NC system was organized. Instead, ELA became even more flexible with how they
administered the NC system and the reduced department continued to function on a largely ad
hoc basis. Maintaining basic functions of processing funding documents and posting agendas.
Given the promise that uniform processes carry for improved departmental efficiency, this was a
self-defeating situation. However, as the capacity of the department has recovered, efforts to
create more structured and uniform processes across the NC system were revisited. Ultimately,
over the years, ELA leadership came to understand that favoring NC autonomy over system
uniformity had not only undermined ELA’s ability to administer the NC system, but also had
undermined the independent functioning of NCs. Recently, ELA has worked with the City Attorney
to develop broad procedural guidelines that can serve the needs of most NCs in most situations,
removing the City Attorney’s office from the review process unless specific problems are identified.

Innovation. ELA’s long-time efforts to innovate have begun to manifest in policy changes
and new program implementation. However, the recent successes belie the long process of
training-staff, advocating with the City Attorney’s office, and soliciting support from City Council.
Many of the recommendations made by the NCRC remain unaddressed. This is not for lack of
interest, but because they involve politically controversial changes, either for City Council of the
NCs themselves, or because they involve an inhibitive cost. Despite these constraints, ELA has
made strides through investing in staff training and taking advantage of opportunities to serve as test subjects for other City departments, which would require a much large financial investment.

Particularly since the current management team took over in 2012, ELA has prioritized training the entire staff, including managers and line staff, with the Peak Performance model offered by the City. ELA’s goal is to break the mold of staffer thinking only in terms of their bureaucratic constraints and instead to cultivate staffers who identify problems and develop proposals to resolve them. This not only empowers staff, but it also places the responsibility in the hands of those who are most familiar with the terrain and best equipped to develop solutions. In fact, the Peak Performance training program that ELA uses, reflects the local knowledge local solutions principles upon which the NC system was established.

ELA’s measured success at implementing innovations has earned it some trust with City leaders. In the case of Novis Agendas, the City Council invested pilot funds in the project to reduce administrative costs associated with NC agendas, and then after seeing its potential savings invested more. On the other hand, ELA’s pilot program to use online and electronic voting systems was more uneven. Online voting represents a major shift in electoral processes with the potential to both expand access for the electorate and also introduce new risks and unforeseen procedural problems. Beta testing online voting with the NC system seemed to offer a useful opportunity to experiment with online voting across a broad range of electoral conditions throughout the City. Furthermore, the relatively low cost and low risk of the effort strengthened ELA’s argument. However, varied interest among the NC systems diverse participants, including strong skepticism among the less technologically savvy NC participants, and community dissatisfaction for the execution of the online voting process itself, brought intense criticism from both Neighborhood
Councils and the City Council. Ultimately, despite mixed success with innovative programs themselves, ELA’s prioritization of innovating on routine bureaucratic processes marks an important transformation both for the NC system and the City.

**Boundary: Centralized vs. Decentralized**

Another process boundary between NCs and the City are their centralized versus decentralized approaches to work. The City functions according to centralized administrative norms. Decision-making power in the City government is held by the City Council and the Mayor, who work out of City Hall in downtown Los Angeles. City Council passes legislation and the mayor oversees the General Managers of City departments. Even for City departments that have sites throughout the City, traditional bureaucratic hierarchies filter upwards and the top levels of administrative leadership of many City departments is located downtown. In this way, decision-making power, whether in the hands of elected officials or the City agencies designing and providing City services, is concentrated “downtown” at City hall or other central city administration buildings and emanates outward to the far-flung regions of the City who may not be well-served by standard operating procedures.

Most of LA’s residents and community advocates, on the other hand, live, work and recreate in neighborhoods outside of the City center. For those not well-served by the baseline City services, those who are dissatisfied with customer service at regional sites, or for those who encounter exceptional circumstances that require higher level policy interventions, managers at district sites are unable to attend to their needs and they must access decision-makers at City Hall. For many community advocates this is a challenge. Driving from a neighborhood in the San Fernando Valley or the harbor area to downtown is an all-day affair, much to ask of a community
member seeking to address a problem with their local services. The time, the transportation issues, parking, and actually getting ahold of decision-makers all present barriers to access. On the other hand, interest groups and funded lobbyist, centralized decision-making does not pose a barrier to access and may instead serve to facilitate access to policymakers while circumventing community stakeholder input.

I know overall in the City system, I've seen and heard too many instances of those who have the power, they go directly downtown. Or they go directly to their Council person. They'll say whatever they want to [the Neighborhood Council], but really when they want their permits and different things, it's downtown. (NC board member - 08nc)

Beyond issues of access, local stakeholders argue that it does not make sense to have policy decisions be made downtown, so far removed from the conditions on the ground. One stakeholder in Skid Row was only able to bring up complaints about broken streetlamps to Street Services, by cornering the General Manager when he was actually in the neighborhood giving a tour and talking about the streetlamps. He had no idea they didn’t work. This issue is especially pertinent regarding development issues. Local advocates complain about adverse impacts of new developments, such as density, parking, traffic, and a host of other local nuisances, and find that the Planning Department, the Planning Commission, and the decision-makers in City Hall do not fully appreciate.

NC participants who perceive the plodding pace of the central bureaucracy as unresponsive to their local needs have advocated for decentralizing decision-making power in favor of neighborhood self-determination. Although little effort has been made to formally decentralize power away from City Hall, Area Planning Commissions are the exception. Area Planning Commissions were meant to serve as a compromise to better contextualize planning
decisions in local conditions while still maintaining adherence to the City General Plan. However, most local stakeholders still find planning decisions to be out of touch with community needs, and would like to see a more decentralized City structure where City services are more attuned to local needs and provide more access to local stakeholders.

Well, it’s all part of the culture of diffusion of responsibility and that was an undercurrent of virtually everything we did. And the only aspect of the charter or two aspects, I guess, that we worked on intently that in fact... acceded to that culture was Neighborhood Councils and the Area Planning Commissions. Because we were diffusing responsibility and the Area Planning Commissions, we required that certain matters go to them and not to the central Planning Commission. (Charter reform participant - 09ss)

The boundary between centralized and decentralized City governance systems presents challenges for how ELA administers the NC system. ELA staffing must interface with both systems, regularly working with centralized City departments and also maintaining a community presence to provide easy access to NCs in the field. Despite ELA’s efforts to station staff throughout the City, resource constraints limit the number of staff available for field deployment. Field offices are expensive to operate and independent field staff do not have access to the much of the department’s communications and data-management services while in the field. Furthermore, as a City department, ELA uses a hierarchal command and control structure, which limits the degree to which ELA actions are governed by decisions made in the field. The limited presence of ELA in the field, and the diminished capacities of ELA staff while in the field, contributes to the view among NCs that ELA is just another downtown City entity trying to exercise control over the distant neighborhoods without offering much in the way of real community support.
ELA Boundary Practices: Centralized/Decentralized

The separation between dispersed communities and centralized centers of power have presented a barrier to NC participation and inclusion, and have created additional challenges for ELA to resolve logistical complications and bridge gaps in community trust. Although ELA is constrained in its ability to function in a decentralized fashion, it has adopted some boundary practices that aim to mitigate problems that arise from managing a dispersed system from a central position. ELA’s centralized/decentralized boundary practices include staff deployment, technological interventions, such as a coordinated database system, as well as coordinating practices, such as regular meetings among all field staff.

Staff deployment. The argument for more decentralized decision-making was a main feature of Charter reform in the 1990s. Proponents succeeded in creating a system of Area Planning Commissions, which moved land use review processes out to the parts of City they affected. Although ultimate decision-making on land use remains at City Hall, this change was hailed as a victory for neighborhood advocates seeking more access to the process. In the early days of the NC system, ELA maintained four field offices: Van Nuys, South LA, East LA, Harbor, as well as a main office located in downtown LA near City Hall. Field staff was based at each of these offices, which had room for ELA staff, as well as larger meeting rooms for NCs to use. The rationale behind deploying ELA staff in this way was to conduct NC business in the neighborhoods. Being community based made it easier for NC participants to access ELA staff, to have a venue available for community events, or even to house NC board meetings if no other meeting spaces were available. In addition, being community based allowed ELA staff to develop familiarity with the local NCs, other local stakeholders, and issues affecting the region.
It should be noted that, similar to Area Planning Commissions, field offices did not truly exercise decentralized power. For consequential decision-making, ELA staff typically contacted management or the City Attorney’s office for guidance on how to proceed, undermining the degree to which power was ever actually dispersed or delegated to field offices. Furthermore, as its budget and staffing shrank, ELA has substantially withdrawn its community presence and now has two offices; the main office on the 20th floor of City Hall, and the Valley office located at Van Nuys City Hall. Although the contraction is primarily a result of the financial crisis and constricting ELA budgets, this change has diminished the department’s ability to respond to urgent community needs and has further limited access of NCs to ELA and other City resources. Moreover, the withdrawal of ELA from the field has negatively affected community trust in ELA and led to a community perception that NC business must always be conducted on ELA’s terms and on the terms of downtown City powers, rather than rightfully on the terms of NCs. Thus, the variation in how well ELA has been able to meet the needs and expectations of dispersed NC stakeholders argues for decentralized staff deployment as a boundary practice.

**Internal Communication.** Since the NC system was established in 2000, the norms of intradepartmental communication, along with the technology available to facilitate it, have changed considerably. ELA has depended on internal communication to manage the dispersed NC system. Two significant facets of internal communication include use of the Quickbase database system and field team meetings.

Quickbase provides a centralized data management system, which allows staff to log NC requests for assistance and widely share the records of their work with NCs. If a particular field staffer is helping an NC resolve a problem with its lease, funding program staff and departmental
managers are all able to monitor and ensure the correct measures are taken and the proper approvals obtained. This platform allows central ELA staff to have a presence in the community, and for field staff to get the support they need regardless of their location. Quickbase also allows for evaluation of ELA services, which allows ELA to identify patterns in NC needs and inefficiencies in ELA responsiveness, and ideally adjust their services accordingly. Quickbase also provides a customer service metric by which the City administrators overseeing the department’s budget appropriation can assess ELA’s performance.

In addition to a centralized database system, ELA has employed meetings among all field staff as a venue for internal communication about NC issues throughout the system. ELA currently holds two-hour monthly field meetings going through a list of all NCs, updating the group on each one’s status and current issues, and soliciting feedback and advice from field staff and direction from managers. These meetings include the entire field staff as well as funding program staff, other administrative support staff, and staff from the City Attorney’s office. Although these meetings do “get everyone on the same page” and help establish precedents for how departmental management wants to deal with certain types of issues, some staff members find them unhelpful. With 96 councils, there is not much time to spend on each NC. Even just five minutes on each would require eight hours, and not much room for staff to substantively participate. Furthermore, the all staff meeting requires all field staff to be called into the main office. Finally, updates are duplicative, since they mostly involve reviewing a database chart to which all staff already has access. Some staff members cite earlier versions of this meeting, which included fewer staff and during which field staff could focus on unique problems and talk them out. ELA has begun to move back in this direction by glossing over NCs with more routine issues
and spending more time on more complicated situations. It seems that the useful aspects of field meetings are the opportunity to develop a consistent understanding of the case and provide peer consultation. However, with other resources for sharing information available and the time lost in the field for staff attending this meeting, ELA would be better served by cultivating other opportunities for peer consultation.

The degree to which ELA has been able to make improvements in internal communication practices and resources has improved ELA’s effectiveness and efficiency at bridging the decentralized/centralized boundary between NCs and City. The development and deployment of the Quickbase data management and communication system has helped meet the needs of ELA to coordinate service to NCs across the centralized/decentralized boundary. Similarly, field meetings have provided opportunities for staff to interface and draw from each other’s experience to solve problems across the system. On the other hand, occasional breakdowns in internal communications have undermined ELA’s ability to manage the dispersed NC system with consistency.

**Evolution of Centralized/Decentralized Structure**

**Analog versus Digital Access.** At its height, ELA had four field offices throughout Los Angeles. Budget cuts to staff and operational expenses have since reduced ELA office sites to two: a main office in City Hall and a satellite in Van Nuys City Hall. Becoming more centralized has allowed ELA to consolidate many of its administrative processes and interface more closely with other departments in City Hall, including the City Clerk and the City Attorney. Furthermore, because field staff received relatively loose guidance on working with NCs, their advice and decisions were inconsistent. This caused confusion among NCs, invited NC challenges to ELA
decisions, resulting in many matters having to be referred back to the central office for a decision. On the other hand, centralizing ELA’s operations has ceded its presence in the community and created additional barriers to access for NC participants. Moreover, centralizing ELA’s operations downtown has contributed to the community narrative of the City not caring about neighborhoods.

What ELA has ceded in physical presence and in-person access, it has attempted to make up in online presence. All of the NC forms and applications can be downloaded from the website. While, some forms still need to be submitted in hard-copy, ELA has developed online portals to complete routine administrative processes, including Monthly Expenditure Reports, NC inventory trackers, and Community Impact Statement submissions. In addition, many processes include online tracking systems that show where contracts and leases are in the process of review, how up-to-date NC funding documents are, as well as schedules for required trainings. By providing access to these forms and process trackers online, ELA can distribute this information widely with minimal staff attention. This allows staff to be more available for other more hands-on supportive services.

Despite the expansion of access through digital media, many NC stakeholders remain unconvinced that digital access provides a suitable substitute for more decentralized staff presence. In particular, NC participants who are averse to digital communication prefer to speak with someone in-person or on the phone. However, ELA has moved steadily in the direction of a more centralized organizational structure with a broad digital presence and a mobile field staff deployment. This arrangement attempts to balance the tension between centralized and decentralized approaches in a cost-effective and human resources efficient manner.
**Boundary: Departmental Staffing**

ELA staffing represents another boundary between the City bureaucracy and NCs. There are several dimensions to how ELA departmental staff are organized and deployed that affect how ELA can work with NCs and the City. Two issues that have historically had an outsized impact on this boundary relationship are civil service status and overall staffing levels.

**Civil Service Status.** Civil service employees are members of the protected public employees union and make up the majority of the City’s workforce, including line staff such as administrative assistants, road workers, and janitors, specialists such as accountants and technicians, as well as senior managers. Civil service organizational processes in the City of LA emphasize following rules and adhering to established procedures.

Ostensibly, these formal civil service processes are used to maintain accountability and ensure that everyone follows the same rules through robust documentation; however, there is a cultural element to it as well. Informants both inside and outside the civil service structure reported that working in that structure offers tangible benefits. Civil service employees have job security, opportunities to advance and/or transfer to different departments within the City, stable day-to-day workflow, and structured and well-defined work parameters. Due to this combination appealing workplace dynamics, many civil service employees report that they see themselves as having a “career” with the City. This perspective manifests in a “clock-in, clock-out” routine that divorces the work itself from any impact it may have once it leaves the civil servant’s desk. One informant on City staff expressed bemusement that over the years some of his civil service colleagues were unable to identify the current Mayor or members of City Council, so far removed
were they from the broader consciousness of the City. In this way, the civil service system prioritizes processing routine work over dealing with unexpected complications.

The civil service system stands in contrast to how NCs and other neighborhood advocates approach their work in the community. Community work must respond to emerging issues in the community. Weighing in on matters of policy, such as new developments, traffic, public safety, or anything else, eventually requires involvement with the City bureaucracy. And though funneling community concerns through the bureaucracy can protect against making rash policy decisions, it also slows down interventions immensely. A member of City Council reported surprise that it took eight months to draw down funds for sidewalk repair that had already been approved and appropriated for that purpose. For community members who contend with mobility constraints, multiyear administrative processes, not including construction timelines, can have major impacts on quality of life. Especially when service requests seem routine or small in scale, yet have major impacts in the community, NCs and community stakeholders experience frustration when they run into what they perceive as administrative obstructionism.

This frustration is further exacerbated by the fact that NC boards are comprised of volunteers who conduct NC business in their “spare time.” Invariably, NC participants invest their time and energy into the issues that are most important to them. In many cases this means meeting late at night and on weekends, and putting in whatever work necessary to get the job done. The limited time and constrained timelines of the NCs’ own processes mean they must work quickly to weigh-in and meet formal deadlines in City processes, at which point the process slows down to a crawl. Furthermore, there is an added element of participation bias among NC participants: many of those who have become involved in the NC system did so because they were
fed up with City services and City processes. Thus, the contrast between the NCs’ “do whatever it takes” approach and the City bureaucracy’s “however long the process takes it takes” approach is a source of major contention, and a major organizational boundary, between NCs and the City.

Like much of the workforce in City departments, a large proportion of ELA staff is civil service. At ELA, civil service staff includes accountants (funding staff), neighborhood empowerment advocates (field staff), as well as data management and administrative support staff. Like in other City departments, senior managers are the only exempt staff and serve at the pleasure of the Mayor. The process-oriented nature of how civil service staff is expected to work can lead to frustrating interactions between ELA staff and NCs, who operate according to a more urgent task-oriented paradigm. Despite ELA’s efforts to tailor processes to best meet NCs’ needs, ELA is constrained by the norms and expectations of civil service culture. These include the uniform application of processes regardless of circumstances; strict adherence to rules; avoidance of situations where no rules or guidelines appear to apply; and lack of aspirational or creative thinking. These traits are ill-suited to a system as dynamic and amorphous as the NC system.

Some ELA staffers resent the roadblocks created by other City stakeholders when they attempt to come up with innovative solutions to NC-specific challenges, or worse yet, suggest reforms that extend outside ELA. Resistance on the part of City stakeholders seems to arise from concern for taking action outside of what the rules specifically allow, lack of enthusiasm for the effort required to change rules to accommodate new and different practices, or some form of resentment targeted at uppity staffers. One ELA staff member compares the culture among City civil service staff to be like “crabs in a bucket,” where “aspiration is perceived as an insult” (ELA staff member - 03d).
These interdepartmental tensions not only result in unresponsiveness to NCs but also become barriers to inclusion of NCs. For instance, NC input into DWP rate analysis has been largely excised due to intra-DWP power struggles. The DWP commission and the executive management of DWP regularly play mandated public notification deadlines off against budget cycle timelines to provide last-minute or late notification of major policy decisions to the Rate Payer Advocate (RPA). This means that the RPA’s comprehensive analysis is not available to the NCs and the broader public until after the City budget timeline requires decision-makers to vote on policy, effectively excluding NCs from a policy process in which they are entitled to participate (City stakeholder - 03cs). Similarly, the Board of Neighborhood Commissioners (BONC) is empowered to make policies to govern the NC system; however, ELA is tasked with implementing them. Because BONC is not a managing board, ELA can decide how or whether to implement the policies BONC enacts. As a result, official NC system policies are inconsistently implemented and enforced, leading to confusion and frustration for NCs who struggle to discern how to comply with policy. Furthermore, the confusion makes it difficult for NCs who wish to advocate for policy changes but do not know which entity to address.

Civil service staff, of course, is not by definition incapable of creative problem solving or responding to emerging needs. However, the system relies on compliant workers to conduct everyday business and routine processes, and quickly promotes highly effective civil servants into positions of leadership. As senior members of the civil service, they have a wide range of opportunities and high level compensation packages. Because of its limited size, ELA would be challenged to justify hiring senior managers, and due to its limited budget, ELA would be unable to compensate them at the same level as a larger department. In addition, effective junior civil
servants often promote or transfer out of small departments seeking larger departments where they have an opportunity to advance. Thus, small departments like ELA, who could benefit from this type of effectiveness and expertise, have difficulty luring or retaining these types of staffers. The difficult nature of the work, with irregular hours and contentious interactions with members of the public, also narrows the field of interest among prospective staff.

They’d have to take a pay cut and suffer. It’s like: “No thank you, not gonna do that.” So you’re always gonna have people that you always would be stuck with, not stuck with because some of them, but the best people are always gonna promote out because they get up to a certain level and then there’s a wide range of opportunities available for them if they did well. (City staff member - 07cs)

Perhaps the most onerous boundary established between the civil service staff and the NCs concerns the premise of bureaucratic transparency and accountability. Too often civil service staff efforts to achieve these goals result in a hesitancy to serve the needs of NCs or the broader public because the process is not provided for in the established rules. Under these circumstances, City staff cannot address emerging needs or engage with new and challenging dimensions of governance, all of which arise frequently in the system of 96 quasi-governmental community groups across the City. Within ELA this effect is even more pronounced due to the heavy presence of the City Attorney’s Office. From the outset, the City Attorney viewed the NC system, and its ambiguously defined relationship to City government, as a major potential source of liability for the City. The City Attorney’s Office scrutinizes NC activities, orders NCs to cease and desist from potentially compromising activities, and issues corrective actions for violations. It also discourages ELA staff from finding innovative ways to engage with NCs which, in the view of the City Attorney, may bring unknown exposure to the City and reflect poorly on everyone, including the NC system. Furthermore, civil service protections for those who faithfully execute their prescribed duties offer
little incentive for staff to be flexible or accommodating. As a result, ELA staff, and City staff more broadly, avoid straying too far from known routine processes so they do not get in trouble.

We’re gonna get in trouble! You know if things go bad everything is gonna go sideways, you know you’re gonna the City’s gonna get in trouble, [ELA]’s gonna get in trouble, Neighborhood Councils are gonna look bad. (City staff member - 07cs)

Finally, the civil service system prescribes how and when staffers do their work. Non-exempt civil service positions must work regular hours as established in the City Administrative Code. For funding and administrative support staff, who conduct most of their work in at their desk, this may be appropriate. Such restrictions are inappropriate for field staff, who regularly attend meetings with NCs or City officials, offer training, and conduct outreach across the City, frequently in the evenings. Managing these hours can be cumbersome for staff on the ground and result in irregular availability during regular working hours. Furthermore, City policy declares that workplace email, and the hardware and software systems to support it, are property of the City. Therefore, field employees cannot access email from the field unless they have a city-issued cell phone, which is uncommon. These and other civil service provisions limit ELA staff from exercising the flexibility necessary to be most effective at the unique nature of their work with NCs.

**Overall Staffing Levels.** ELA has experienced extreme fluctuation in its departmental budget since its inception. In 2004, the ELA budget was $4.9M with 68 regular staff positions. By 2013, the ELA budget had shrunk to $1.8M with only 17 regular positions. At the same time, the NC system continued to grow, certifying new NCs until the number reached 96 in 2014. This deep cut of 51 staff positions had a severe effect on how ELA was able to provide service to NCs. The simultaneous growth of the system exacerbated the strain on staff. At its high point, staffing ratios
were 12 NCs per staffer; at its low point, ratios were five NCs per staffer. An ideal ratio of NCs to field staff is between five and seven (ELA staff member - 05d).

**Figure 10 - Chart staff and NCs**

Beyond the effect that staffing reduction has on the workload of remaining staff, it also affects how work is conducted. Some functions can be downsized only so much before they undermine legal responsibilities such as funding management. This legal concern led to a higher
proportion of positions being cut among field staff who work directly with NCs, support their activities and conduct training. Furthermore, limited availability of specialized staff required remaining staff to become more generally adept in multiple areas of work. During this time, ELA management encouraged staff to assume multiple roles, be more flexible in its approach to problem solving, and do whatever necessary to serve NCs’ needs rather than operating from a narrow set of approved processes (ELA staff member - 01d).

Despite these efforts, limited staff capacity resulted in diminished responsiveness to NCs, with communications and paperwork falling through the cracks. It also meant that ELA’s attention was distributed on a triage basis, with the most acute NC problems receiving most attention. Relatively well-functioning NCs received almost no attention or support; instead ELA focused on NCs that were struggling or posed potential legal exposure for the City. This distribution of ELA resources alienated many committed NC participants who felt that the City either did not care about NCs or was deliberately seeking to undermine the system. At the same time, City stakeholders interpreted the disarray in the NC system as a validation of concerns about the risks of inviting lay people to participate in City government. These stakeholders distanced themselves, further isolating ELA.

**ELA Boundary Practices: Departmental Staffing**

The civil service parameters and overall staffing levels have constrained ELA’s ability to effectively support NCs and led to NC dysfunction, which has dissolved NC trust in ELA and stakeholder trust in the NC system overall. Although ELA is still subject to civil service requirements and remains under-staffed, it has engaged in strategies to adapt to and overcome
these constraints and better serve the needs of NCs. ELA’s staffing boundary practices include civil service negotiation, more stringent internal guidelines, and staff organization.

The civil service structure was developed as a citywide model of staff management and protection, including a prescribed process to conduct departmental hiring. These features have made it difficult for ELA to hire staff that will thrive in its unique environment. The constant demands of NC stakeholders, managing varying aptitudes in record-keeping, and the relatively high exposure to the public are all fundamental aspects of the ELA working environment not shared by other civil service departments. Some ELA staff members find that the department has more in common with council offices, which engage in much more public interaction than most City departments. An ELA staffer with experience working in political offices declared “[ELA] is very much like a City Council office” (Former council staffer - 04d).

City Council offices, however, rely on a mostly exempt workforce, which allows for more hiring flexibility and more flexibility in job descriptions. ELA’s mostly civil service staff is not afforded this flexibility. As a result, one of ELA’s boundary practices has been to negotiate for more exempt positions. In particular, ELA leadership argues that field staff, with its need for unique community organizing skill-sets and flexible hours, should be hired as exempt staff. Exempt status allows for more flexible work schedules, which facilitates more consistent attendance at after-hours meetings. Exempt status also enables staff to innovate because their job descriptions are attuned to the parameters of their specific job rather than standardized across City systems. This openness to innovation is especially important for ELA staff since NCs are themselves innovative and constantly pushing for improvements to City processes. One of the NC system architects expressed dissatisfaction with the constraints civil service requirements impose on ELA.
Generally if you’re a civil service employee you want to work for a large department. You don’t want to go to a small department. [ELA] is just culturally, it’s just such a misfit for the City. So that’s the downside of being in the City. You have to, it’s an entrepreneurial department. And the culture of the City is not entrepreneurial. The Council offices are probably closer to entrepreneurial because they’re more on the ground and responsive to customer needs, they’re more in the customer service delivery business. So I... don’t know what the answer is. But I think that’s the constant misfit, and that’s creating the tension.  
(Former ELA GM - 01ss)

ELA’s advocacy for exempt positions is itself a politically charged undertaking. Exempt positions are limited in the City Charter. Therefore, these positions are guarded closely by City Council and the Mayor’s office which must distribute them judiciously among City departments and their own staffers. Furthermore, any reduction in civil service staff positions is challenged by the City employees’ unions who are vigilant for any possible weakening of workforce protections or reduction in their membership. Finally, for all of the increased operating flexibility it affords them, many among the field staff appreciate the civil service protections. A number of the field staff members have been around since before they were given civil service status, so hiring them was never a reflection of their skill set. Given the sometimes politically compromising nature of their work, they like that they cannot be dismissed at will. For instance, if an ELA staff member helps an NC advocate for an issue at odds with a council office, he or she would feel more vulnerable to dismissal if not for civil service protections. The very civil service protections that inhibit creative thinking and promote complacency also provide freedom to balance the various needs of ELA’s various stakeholders without concerns over retaliation.

**Departmental structures.** Formal departmental rules, regulations and procedures represent another boundary structure employed by ELA. While ELA’s priority seems to have been to increase flexibility, initiative and agency among staff to provide more responsive service to NCs, both staff and NC participants have expressed frustration about the lack of codified structure that
rules provide. Even while arguing for more autonomy and self-direction, NC stakeholders argue that lack of formal rules leads to inconsistent application of rules, uncertainty around how processes unfold, and conflicting expectations. For instance, if application of rules depends upon an individual staffer’s judgment then different NCs might receive different responses.

By the same token, some ELA staff see the benefits of more highly structured rules. One staffer, who had previously interfaced with the public while working in a different department, argued that rules actually support staff. Rules convey to the public that not every issue is subject to negotiation, which reduces arguing and allows staff to solve problems that are actually in their purview. Furthermore, formal rules remove staff from the crosshairs of unhappy NC stakeholders because the staffer is no longer personally arbitrating the issue and instead cites a higher authority.

Often times the conversation would end with “I’m emailing you a copy of Ordinance X,” you know. Um, “Please provide me with [Document Y]. Please see Subsection [Z] where it states that you have a [case against you] and that’s what it is.” I mean, it was very clear cut. This is not that job. This is a completely different world of things. So even in funding, which is the more regulatory section of the department, it was nothing like it was in [Department Q] where if you had these structures, these really solid structures to reference in an almost, I don’t want to say lean on, leverage. (ELA staff member - 15d)

ELA’s efforts to implement more rigid departmental structures have been tempered by its effort to develop and maintain trust among NCs. Many NC stakeholders view tightening of rules as an effort to stamp out NC independence. There are also concerns about how more rigid enforcement of rules might result in inequities for NCs with lesser operating capacities, particularly those located in historically marginalized areas. Thus, ELA’s move to create uniformity with funding document submission, record-keeping, leasing, and agenda posting is all accompanied by
efforts to improve these processes by quickening turn-around times, expanding access for NC participants, and improving staff efficiency in responding to NC requests for assistance.

**Staffing Roles.** ELA uses organizational division of labor, particularly the use of specialists and generalists, as a means of addressing the various needs of NC stakeholders. Staffing roles within ELA reflect the various demands of operating a department as well as the various activities necessary to both support NCs and ensure their compliance with City regulations. ELA organizes these roles around the areas of funding, general administration, training, policy and government relations, Board of Neighborhood Commissioners, communications and outreach, information systems, and field. Within ELA, these activities are consolidated into five units: Policy & Government Relations, Communications & Outreach, NC Operations, Systems, and Administration. Policy & Government Relations, Communications & Outreach, and NC Operations all have the dual responsibility of conducting field operations.

**Figure 11 - ELA organization chart**
The premise is that dividing responsibilities in this way allows for units as well as individual staff to specialize in roles and become experts in their field of responsibilities. This method of organizing ELA also allows units to hire individuals with skills specific to their function. For instance, the Policy and Government Relations team can focus on hiring staffers with a background in policy analysis or working in elected offices, which is what they have done. Similarly, the training unit can focus on staff that have experience working with NCs and helping them to navigate ELA and other City processes. The training unit is now comprised of some of the longest tenured ELA staff that have the most experience.

Importantly, consolidating ELA processes within dedicated units also allows for additional role definition. For instance, funding is an ELA activity that involves a regular recurring and rigidly defined process with little to no room for deviation. These attributes contribute to the perception of ELA as an antagonistic enforcement entity by NCs. Furthermore, the other more irregular responsibilities of ELA staff occasionally compromise the rigid timelines involved with the funding program. As a result, in summer of 2017 the funding unit was moved to the City Clerk’s office. The Clerk’s office has a high capacity to conduct recurring routine processes and maintain detailed records. Thus, the move took advantage of the organizational strengths of the Clerk’s office, relocated a responsibility that compromised ELA’s credibility with the NCs, and consolidated remaining responsibilities around ELA’s more supportive capacity building roles.

It should be noted that few outside of ELA have a strong impression of how ELA is organized as a department. NC stakeholder experiences are typically focused on interactions with the assigned field staffer, and potentially a funding clerk. While these staffers may be familiar, regular staff turnover and internal reassignments can result in regular new staff connections. In
addition, ELA conducts training, presentations, and elections on a less regular basis involving staffers who are less familiar or completely unknown to NC participants. Furthermore, the collaborative processes that staff use to address NC issues, particularly via Quickbase, means that multiple staff may be working with each NC behind the scenes. Ultimately, this all contributes to confusion on the part of NCs regarding how ELA internal processes operate. In some cases, this leads to the impression that ELA does not have a coherent organizational structure.

**Specialist versus Generalist.** In addition to ELA’s specialized units, there is a tension regarding whether individual staffers should function as specialists or generalists. Within ELA, specialists are staffers who, by virtue of training and experience, have enhanced skills in their field of responsibility. Typically, specialists are directed to focus their work on areas of their specialty. Generalists, on the other hand, have training or experience working across multiple fields. This allows generalists to develop a familiarity with a variety of fields of work, without enhanced skills in any particular area. ELA asks generalists are asked to work interchangeably across fields as needed.

As with the organizational units, there are advantages to having staffers become specialists. Their experience can develop into increased efficiency and efficacy for the tasks for which they are responsible. For instance, staff who work on elections can develop an understanding of how to conduct them in the community setting, learn how NC elections are different than other elections, become exposed to the typical problems and frequently asked questions, and even become familiar with the unique intricacies of the bylaws for certain NCs. Similarly, funding specialists and agenda specialists can identify problems with document submissions and know the appropriate response. Finally, many of the roles within ELA have a
learning curve that can be achieved only through hands-on experience. Specialists ensure that this hands-on training gets deployed most effectively.

The experience and familiarity of specialists also applies to field staff. Experienced and specialized field staff may have ties to a particular region of the NC system, such as the Valley or the Harbor, and in many cases develop rapport with the NCs and the NC participants in those areas. This rapport can improve communication, because ELA staff know exactly whom to call if they need to address an NC problem. Improved communication fosters trust because NC participants have positive and fruitful interactions with ELA staff over time. Many among ELA staff and NC participants feel that an experienced field staffer not only knows how to support NCs and help resolve issues quickly, but also serves as a fixture in the community. For NCs that experience regular turnover, long-tenured field staffers can be a source of stability, a resource for new NC participants, and serve as experts on local NC history for ELA.

Like other functional roles, there is a steep learning curve for prospective field staffers. NC participants, particularly those who have served on boards for a long time, can be difficult to work with. This is sometimes because they have challenging personalities. Other time they also try to bully or manipulate new ELA staff in order to get their way. ELA field staff describe the learning curve as a trial by fire, where more than learning the job itself, field staffers must ascertain whether they have the disposition to work effectively with NC stakeholders.

Generalist staffers offer some advantages that specialists do not. First, generalists are more interchangeable. If a staffer is out sick, in the field, or otherwise unavailable, another should be able to step in and respond to questions with little or no decline in capacity. Furthermore, staffing ELA with generalists helps prevent the concentration of knowledge, particularly knowledge
about certain NCs, in a single individual. If that individual were to leave, ELA would lose a much higher proportion of capacity than if that knowledge were diffused among multiple staffers.

Perhaps the strongest argument for generalists is that fewer total staff can cover a broader array of fields. For instance, when ELA staff was cut from 68 to 17, specialists became generalists. The department simply did not have enough total staff for anyone to specialize. Every staff person needed to be able to speak to every issue. Of course, this arrangement did not match the higher level of service that could be achieved with a large specialized staff. However, adapting staff skillsets allowed the department to maintain a baseline level of support to the NC system through a difficult fiscal period.

Finally, despite their specialized skills, field staff serve as the primary point of contact for NCs on every topic. As a result, they must develop capacity as generalists at least sufficient to speak to issues and direct NCs to the correct staff person within ELA. Because field staff are also assigned to ELA specialty units, they experience considerable demands on their expertise, both general and specialized.

Field is [in my opinion the biggest] area where there’s just the learning curve is so high, where you kind of do have to absolutely know everything. I don’t know how you would break that up though. Because... I guess the Neighborhood Council members look at you as kind of a resource ad nauseum you know. (ELA staff member - 01d)

The argument over specialists versus generalists shifts based on the emerging needs of the department and the NC system as a whole. Currently, ELA is in the process of expanding from a small group of generalists and beginning to develop some specialized capacities within departmental units. The focus on policy and government relations, as well as new training initiatives, reflect emerging needs among NCs. Through this transition, ELA staff have come to
recognize that they are able to provide better service with specialists, and that generalists often must refer nuanced or detailed questions to specialists anyway.

I can see why there’s this need or this want to intertwine every role and have everyone sort of be a jack-of-all-trades and master of none. I can understand that. But again, at the end of the day, in my opinion there’s gonna be questions asked that are gonna be very specific to a role. I mean, I may not be able to answer and have to refer it back to a funding specialist or to an elections specialist or to outreach. You know? (ELA staff member - 06d)

Unlike staff in elected offices, ELA staff do not simply respond to NC complaints and pass them on to City departments to be addressed. When ELA recognizes a pattern of NC issues or concerns, it has the responsibility to develop interventions to resolve them. Programs that effectively respond to NC needs require the depth of knowledge and experience of specialists.

I don’t think it helps having generalists, I think it helps having generalists in elected offices. I think it helps having some generalists and liaisons in departments. But you need specialists to be able to really put together solid programs to try to sustain capacity building. (ELA staff member - 10d)

Ultimately, balancing the staffing approach both in specialty units and between specialist and generalist staffers reflects a constant adaptation to NC system needs. In particular, balancing staffing approaches serves as a boundary structure to manage ever-changing demands from NCs and external constraints such as budget cuts and the resulting fluctuation in staffing levels.

Evolution of Departmental Staffing

ELA’s approach to organizing staff has changed throughout the lifespan of the department. Early on, the large staff was able to occupy discreet roles and carry a manageable workload. Field staff functioned entirely as field staff, with others focused on training, funding and administrative tasks. Budget cuts required that many staffing positions be cut and that field staff take on multiple roles, including administrative support responsibilities. As the City and department have
recovered from the financial crisis, the staff has begun to grow, once again coalescing into specialized units. However, this time some of these units, such as elections and funding, moved into other City departments.

The issue of civil service status has shifted back and forth during the same time, reflecting ambivalence towards the protections and constraints of civil service designation versus the flexibility and vulnerability of exempt status. The nature of ELA work vis-à-vis the role of its staff straddling the boundary City and neighborhoods means this ambivalence is likely to continue. Similarly, the tension between specialization and generalization reflects the expectations that ELA staff be both easily accessible resources in the field and subject matter experts. Ultimately, the shrinking of the department and regrowth reflects less a shift between specialist and generalist, civil service and exempt, but rather a consolidation of roles. As ELA increasingly articulates its role to NCs as a supporter, advocate, administrative manager, and enforcer, the expectations of staff will also consolidate and be more easily organized.

**Major Findings and Summary**

The post-progressive era city is an entity built largely on process. Processes exist to provide consistency, transparency, and accountability and to prevent improper actions on the part of political leaders. However, city processes are not always effective in achieving these goals. Furthermore, the price of consistent processes across a city of millions can be inefficiency, delay, uninspired workforce, broken lines of communication, and inaccessible points of contact. In contrast, Neighborhood Councils function with urgency to combat the perceived ills in their communities. The abstract value of “consistency” is hardly compelling to a neighborhood group concerned about a dangerous traffic intersection or a land use hazard next door.
ELA functions as a boundary structure in mediating contrasting process expectations held by the City and NC system. Process boundaries coalesce in three areas: city bureaucracy, centralized versus decentralized processes, and ELA departmental staffing. ELA engages in boundary practices to address each. ELA’s bureaucratic boundary practices include streamlining processes, developing structure, and encouraging innovation. ELA’s centralized/decentralized boundary practices include staff deployment and internal communication. ELA’s staffing boundary practices include organizational structure, staffing roles, and specialist versus generalist. These boundary practices have evolved over the lifespan of the department in response to departmental leadership, fluctuations in departmental funding, and the development and increased sophistication of the NC system.
Findings: Governance Role Boundaries and Boundary Practices

And it’s not just because of the Neighborhood Councils, but it’s been a mechanism to make LA feel smaller, I think. In a way that’s appetizing, as something that’s positive, that’s making it feel smaller in what would otherwise feel so massive. (Elected office staff member - 05cs)

Purpose

This chapter presents the boundary relationships between the Neighborhood Council system and the City in the arena of governance roles, describes different types of role definition boundaries between City and Neighborhood Councils, identifies some of the problems that arise in these boundary relationships, describes how ELA manages these governance role boundary relationships, and shows how ELA’s approach has evolved over time. The chapter begins with a discussion of civic engagement theory and the theoretical roles that Neighborhood Councils play in municipal reform, particularly instrumental, substantive, and normative roles. This discussion expands to describe the role of ELA in supporting the theoretical aspirations of the Neighborhood Council system, how ELA fosters access for participation in local government, and how it uses participatory and inclusive practices to overcome barriers to access.

This chapter continues with an examination of two noteworthy governance role boundaries: 1) stakeholders versus system, and 2) normative versus existential demands. The multifaceted roles of NCs contribute to contrasting expectations among stakeholder groups, which become disruptive to the realities of program implementation. Each section describes the boundary practices ELA has employed to navigate the contested space between theoretical aspiration and political reality. Each section ends with a discussion of how ELA’s boundary practices have adapted to the ever-changing expectations and political contexts of the last 17 years.
Introduction: Governance Role Boundaries

Codes under the governance theme reflect the boundary between City and NC governance paradigms, and fall within three boundary subcategories: normative versus pragmatic boundaries, participation versus inclusion boundaries, and access/barrier boundaries. The governance findings suggest that most activity is concentrated between boundary practices with the most intractable barriers. In particular, normative vs. pragmatic boundaries garnered the most presence among my findings, which reflects participants’ strong feelings about both the role that the NC system plays in City governance as well as the dysfunction involved in system implementation.

Civic Engagement Reform

Political participation is essential to a healthy democracy. Barber (2003) argues that yielding governance responsibilities to representatives distances government from local needs and ultimately encourages the manipulation of democratic values away from community goals, leading to civic alienation (Pharr & Putnam, 2000). The resulting “thin democracy” is characterized by civic anomie (Barber, 2003), or weak ties among neighbors, which suggests a distinction between the
concepts neighborhood and community. Furthermore, rising mistrust of government and concern over the amplified influence of interest groups in local government decision-making (Nye, Zelikow, & King, 1997; Deleon & Deleon, 2002, King, 1999) and the accompanying political cynicism (Berman, 1997) have led to a decline in public participation in governance (Cooper & Kathi, 2005). Thus, civic alienation functions as a negative feedback loop.

These sociopolitical challenges have also led to a renewed effort to incorporate more grassroots input into traditional electoral structures (Berry et al., 1993; Ingram, 2008) to strengthen and restore civic engagement at the local level (Cooper & Musso, 1999). Increasing civic engagement provides substantive, instrumental and normative benefits. Civic engagement improves the effectiveness and efficiency of the public sector. Moreover, in a democratic society, an active and engaged citizenry is a good in itself (Campbell & Marshall, 2000; Pratchett, 1999; Fiorino, 1990).

Los Angeles has long struggled with poor political participation. There are a number of theories why this is the case, including the divisive political history and the neighborhood level identification, as well as the abundance of fair-weather distractions. In addition, Los Angeles has long held its elections in odd years, so they never correspond with major statewide or national elections held in even years. In 2015, voters overwhelmingly supported a ballot measure that changed the Charter to allow Los Angeles to share election day with other major elections beginning in 2022. Some also feel that the City has an apolitical culture, particularly when compared to cities like New York and Chicago.

I1: So we created [the NC system] but you can’t change the culture of the City just because of a structure. I mean, look the turnout does tell us something. The turnout of 15% on a regular day tells us all we need to know, they’re not engaged. People here are not
engaged! Now, I’m sure it’ll be higher in a presidential election but what does that mean? It won’t be 90%, it won’t even be 50%, I would predict. So it’s just people here, whatever they do, whatever’s important to people here, as a general rule, it’s not voting, it’s not elections, whatever. In New York it’s very important.

I2: I daresay and I’ve heard it too many times, “we didn’t come here for politics! We left that back east!” [...] and there’s a sense of release, there’s a sense of being unburdened with having to worry about politics... (Charter reform participants - 09ss)

Voter turnout, a measure commonly, though imperfectly, used to represent civic engagement, has been in decline in Los Angeles citywide elections since the late 1960s. Following a brief uptick in the late 1990s, it reached a record-setting low in 2015 with a turnout rate of 15.9%. This lags behind other large cities like New York and Chicago, which hold citywide elections during high interest state and national elections. In Los Angeles, primary elections typically draw a higher voter turnout than general elections since many primaries are settled by a candidate receiving an outright majority of the vote, including many Council candidates running unopposed. The low level of voter turnout means that even a relatively small margin of votes often results in an overwhelming victory for a candidate. For instance, in 2013 Councilmember Ryu rode a 207 vote margin in a competitive primary of 14 candidates to advance to a runoff. Ryu ultimately won the general election by 2,317 votes, claiming a council seat representing approximately 275,000 constituents with only 13,161 total votes. With less than 5% of the district invested in its representative, a representative and his or her constituents become disconnected.

In the 1990s, civic alienation was a major problem in Los Angeles, punctuated by multiple viable secession movements and violent civil unrest. The Los Angeles charter reform efforts of the

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23 Source City clerk – elections certified result

24 Source City clerk – elections certified result
The 1990s represented the greatest effort of City leaders to combat civic alienation and anomie. Enhancing civic engagement structures within the City served as a cornerstone of the unified charter reform proposal, and appealed broadly to the dissatisfied voting public. For the commissions that designed it, the Neighborhood Council system was optimistically seen as a new tool to combat disengagement. For the political leaders who supported it, the Neighborhood Council system was more cynically seen as a politically popular reform that could push through less popular reforms to the government structure.

**NCs pursue civic engagement and government responsiveness in two principal ways. First, by creating additional mechanisms for meaningful participation over time, citizens will feel less alienated from their government (Musso et al., 2006; Arnstein, 1969; Krimsky, 1982). Second, NCs provide instrumental ways for cities to collect and use local knowledge, and lead to better understanding of local policy issues and better crafted interventions (Musso et al., 2007; Musso et al., 2011; Berry et al., 1993). Thus, NCs can strengthen both the legitimacy and efficacy of City governance. Although civic engagement was approached as a tool to rescue a struggling Los Angeles governance system. In practice, it represented a paradigm shift in governance philosophy. This unanticipated shift has had implications not only for how the Neighborhood Council system has been implemented, but also for the role of civic engagement in Los Angeles governing practices.**

**Governance Role of Neighborhood Councils**

A major boundary between City and Neighborhood Council stakeholders reflects their differing views on the role of Neighborhood Councils within the governance system of Los Angeles, what their powers are, and what their powers should be. This difference of opinion can be traced
to fundamental disagreements about the process of integrating the power structures of a traditional electoral system and a grassroots system. Electoral democracy, fundamentally, is built on popular representation and elite expertise (Bachrach, 1967). Furthermore, the Progressive-style bureaucracy dilutes the power of elected representatives by assigning day-to-day governance to apolitical bureaucrats (Mullin et al., 2004). The elected leadership of the City, City Council and Mayor, and the bureaucratic City departments all reflect these features of electoral democracy.

In contrast, grassroots democracy is built on direct participation and local knowledge (Abers, 2000; Fung & Wright, 2001). Reformers built the Neighborhood Council system on the premise that local communities have substantive knowledge regarding neighborhood conditions that will improve City services. Moreover, the dynamic of an unresponsive City bureaucracy contrasted with energized neighborhood advocates is shaped not only by the fairness of how power is distributed in the City, but also by broader notions of how the City should be run most effectively and efficiently. As such, this gulf reflects both a major philosophical difference between City and NCs, and touches on the same frustrations and impulses that led to the secession efforts of the 1990s.

The development of the NC system included a broad range of participants throughout the City and the neighborhoods, so it is unsurprising that different stakeholders presented a variety of perspectives on the role of Neighborhood Councils within the City governance system. Some neighborhood stakeholders suggested that NCs serve an important community-building function in cultivating a positive and prideful relationship between locals and their neighborhood. Los Angeles is a transient City, with people moving throughout the City and region and working somewhere other than where they lived. This led to weak ties between individuals and neighborhoods.
Neighborhood Councils helped some locals develop a stronger and better articulated relationship with their neighborhoods.

I traveled, [and] I worked anywhere but in that neighborhood. I was gone every weekend for play, I was gone during the week for work. So I’d leave town, I had a go bag. I get a call, I go. So I wasn’t a local, “Oh how’s my street?” So there was a transformation and the Neighborhood Councils were key in that (ELA staff member/former community activist - 03d).

Another respondent described his efforts to maintain a high profile role in his community in order to demonstrate to young people that positive role models, especially in historically marginalized neighborhoods, did not just leave upon achieving any success, but stayed and invested in their community. Instead they became important community leaders. NCs provided a platform for community leadership.

If every athlete, entertainer and successful person from the inner city would go back to give go back to their communities, where they’re from, and actually helped out, the inner cities wouldn’t be as bad. Just even the interaction, not even having to come out of their pockets with any funding, but just their presence so the young kids could be inspired by seeing what we call celebrities or successful people, then that would motivate them to want to achieve that. Because when the celebrities and when the success is removed from the inner city, you know the kids’ hopes and visions you know they can’t connect to something that isn’t there (NC board member - 05nc).

Some NC stakeholders saw themselves not so much as a legitimizing force in governance, but as revolutionaries, whose role was to overthrow the imperfect existing system of governance. This role was particularly popular during the organizing phase of the NC system, where neighborhood advocates built on the momentum of charter reform to design the City they wanted to see.

Historically it’s not unique that the people who were dedicated and involved in the process, once they’ve gotten what they were after [they leave]... and neither is it particularly illogical, there can be people who are incredibly talented and good and committed and driven to make a revolution work, but it doesn’t mean they’re good administrators... or can even read! What
the hell is that? But it’s the concept of Neighborhood Councils was a good one, a good idea. But the government is flawed. Period. (NC founder - 06ss)

However, as administrative burdens began to amass, this idealistic attitude turned to a more cynical effort to disrupt the smooth operations of a corrupt status quo. Some individuals used Neighborhood Council venues, particularly meetings of the Board of Neighborhood Commissions, to purposefully and articulately demonstrate hypocrisy or ineptitude in City operations or ELA. Other individuals functioned more as gadflies with the apparent intent to disrupt, inflame emotional responses with offensive behavior, and bait litigation against the City.

Beyond these various perspectives regarding Neighborhood Councils, NCs occupy three different roles that demonstrate how participation contributes to a healthy democracy: instrumental, substantive, and normative (Fiorino, 1990). NCs occupy an instrumental role based on the theory that effective community participation in policy decisions brings better results. NCs occupy a substantive role because they can offer local expertise in the policy landscape of their own neighborhoods, as they are more familiar with the issues, problems, and potential solutions than City bureaucrats. NCs occupy a normative role because participation has merit, is a fundamental part of democratic process, and provides legitimacy to democratic self-governance.

**Instrumental.**

City stakeholders see NCs in an instrumental role. On the one hand, NCs can provide a certain amount of end-user input, but mostly within established venues for community participation. Testimony in Council hearings, contacts with elected offices, and even community impact statements, all provide information that can be absorbed within existing City processes and conform to the City’s established policy agenda. In the case of NCs, broader participation allows for more diverse perspectives and values. The more sizeable and diverse the participation, the
more participants feel that they are part of the process and no longer delegating decisions to faceless bureaucrats. This participatory confidence allows the system work better overall.

On the other hand, City stakeholders see NCs as a useful avenue to disseminate information in their “community outreach” efforts. If the Bureau of Street Services has a new initiative, or elected officials want to boost attendance at their public events, reaching out to NCs is seen as an effective way to reach large numbers of community members. Similarly, broader participatory access allows the City’s outreach efforts to develop mutual trust and confidence between the City and neighborhoods.

However, as far as City stakeholders are concerned, NCs are not necessarily entitled to more access than any other constituency. Elected officials argue that their districts elect them to represent and lead. In their view, Neighborhood Council board members, who may have been elected by several dozen of their neighbors, carry neither the electoral legitimacy nor the policy expertise to have a major influence on the City’s policy agenda.

[NCs] advise the City Council members, elected officials, and in my opinion they were established to help convey the local needs of the people to help serve these needs faster and establish a bridge between local government and the community constituents [...] I think their role is to help determine and pinpoint the problem areas or the issues at hand because [...] the grassroots are the ones, soldiers on the ground walking, they know what the issues are (ELA staff member - 06d).

In this way, NCs and the NC system do not represent a shift in City processes, let alone governance roles. Instead, NCs offer more user inputs within the existing public participation structure. Ultimately, NCs serve as a new participatory venue within an existing governance paradigm, serving the needs of City government.
Substantive.

Alternatively, Neighborhood Council stakeholders see NCs in more substantive and normative roles. NCs provide important information about community conditions to City policymakers and bureaucrats. NCs have a unique relationship with their neighborhoods. They are comprised of local community stakeholders who understand local issues, understand the landscape of community relationships, and have been elected as the leaders to represent the community to the City. NC stakeholders are experts on their communities and may be better informed on what sort of policy interventions would be most effective based on community conditions. NCs can also inform policymakers about otherwise-unknown local political realities that might present challenges to City efforts in their areas. In this way, NCs provide a unique and essential perspective on local matters that cannot be provided by any other body. For instance, a city planner might be expert in what comprises a well-designed park space, but a local NC might be able to better explain why there is opposition to a new park based on its familiarity with local history, and sentiments on the ground.

I think I think part of it’s the human resources, there’s no question. I’ve been involved for 28 years in in local government stuff, I think I could go through City Hall with my eyes closed and just touch what I needed to. But so have most of the people on my board, even though you know they’re not professionals in government. [A]’s been involved in the community for probably 45 years. [B], born and raised in this community and been involved in all the organizations in the area. Probably the majority of them have been. (NC board member - 01e)

Substantive contributions by NCs offer to improve both effectiveness and efficiency of City programs. The cost conscious city is always drawn to efficiency, typically in the form of less wasted time, and maximizing the impact of scarce city budget dollars. NCs and the communities they represent, on the other hand, are particularly interested in ensuring that the City services are effective. Many NC stakeholders view poor City services as evidence that the City ignores their
vital input. Furthermore, NCs ascribe the City’s inability to utilize the local substantive knowledge they provide to the ineptitude of the bureaucracy, or patronizing dismissal at the hands of technocrats.

**Normative.**

An active and engaged citizenry is good in itself, and by providing a venue for civic engagement, NCs serve a normative role within democratic processes. Civic engagement offers several categorical goods including accountability, agency and legitimacy. NCs provide an additional way in which local stakeholders access their government, provide feedback and demand answers. NCs also provide stakeholders a way to directly engage in self-government, judge their interests for themselves, and participate in decisions that affect their own communities (Fiorino, 1990; Bachrach, 1967).

It’s not so much the Neighborhood Council folks, because honestly I will be sitting there with them just as puzzled as they are seeing how something happened in City Hall and I think in terms of when you say how do Neighborhood Councils hold the City accountable? How do they bring that voice from the community, and I think one of the questions they constantly need to ask is “why why why why why?” You know and that’s what I actually present a lot of times to other City departments and City electeds is “why is this this way?” Because some things are created from years of City people just doing it and they’ve never gotten public input for it and so now you just have this way this bureaucracy of something and when you start asking them “Why? Why would you do it this way?” they can’t defend it. (ELA staff member - 01d)

I’m trying to get Neighborhood Councils to do and I may have to write it again, is to prepare report cards. And [...] when election time comes around they’ll go back and they’ll review the voting records of elected officials. [...] keep holding them accountable and... when a vote comes up you know the Neighborhood Councils can say “look, this is on our position paper here, we expect you to vote this way. We’re gonna keep an eye on you, and this will be on your report card.” And then what, semi-annually, quarterly, whatever it is, you can issue the report card. Now, the elected official has to realize that the public has one really easy way to see how they’re doing. (Former ELA GM - 07ss).
NCs also see themselves as an important legitimizing force for City governance. In a representative system where power is concentrated at City Hall and constituents struggle to access their elected representatives, NCs provide an essential venue for community stakeholders to voice their concerns. These NC stakeholders claim to be the elected voice for their communities, and argue that the legitimacy of their position is drawn from local communities where they represent elected officials’ own neglected constituencies. In this way, NCs offer a body in which community stakeholders can challenge City agencies as well as their own representatives and hold them accountable.

So it’s really a delicate balance and it’s really up to the City Council, Mayor’s office and those folks are elected throughout the City. And the voters at the end of the day are the ultimate electorate, the boss on top of everybody I think. And the Neighborhood Councils, by them being elected through their respective communities, gives them a lot of sway and I think it gives them their base of authority. It’s a delicate balance. (ELA staff member - 04d)

These contrasting conceptualizations of NCs lead to role confusion. Although these instrumental, substantive, and normative roles are not necessarily mutually exclusive, balancing the expectations and specific realities of implementation that come with each can be a complex undertaking. The NC system exhibits an array of democratic principles, but is also tethered to the empirical realities of City politics, organizational management, financial management, and petty interpersonal relationships. In this way, role definition of NCs in City governance presents a major on-going challenge for NC administration and a defining boundary for the NC system as a whole.

Role of ELA

In Los Angeles, public employee unions, developers, homeowner/business associations are established constituencies and already have substantial access and weight in City Hall. The specific aims of the Los Angeles NC system are “to promote citizen participation in government and to
make government more responsive to local needs” (Los Angeles City Charter art. ix, sec. 900).

These goals reflect that the fundamental purpose of NCs is to bring additional voices into the governing process and thereby improve both the efficacy of City services and the legitimacy of the City government. The NC system is premised on expanding access to new constituencies. ELA, the City’s means for establishing and managing the NC system, was created with the fundamental goals of the NC system in mind. Much like the NCs themselves, the ELA’s mandate was broad and its roles multifaceted. However, expanding access between both new and established constituencies does not ensure participation and responsiveness. Barriers to access require that ELA engage in both participatory and inclusive practices to achieve the NC system’s goals.

Upon the creation of the NC system, members of established constituencies quickly became involved in their local NCs. However, groups with limited previous experience with local or electoral politics also began to participate. Unlike other venues for participation in government, non-citizens, felony disenfranchised individuals, and youth were all eligible not only to participate but also to serve as elected board members of their respective NCs. Over time, members of these new constituencies have become engaged and demonstrated their passion and efficacy. Some NCs located in immigrant enclaves conduct their meetings entirely in Spanish, reversing the typical dynamic of language barriers for non-English speakers. NCs in areas of Los Angeles with growing parolee populations have begun to organize individuals with prior felony convictions to advocate for employment opportunities and other criminal justice reforms. Finally, energetic community activist youth have joined NCs to serve their communities and also to build their capacity for later careers in public service. Although these examples remain limited in scope, they do reflect
opportunities for historically disenfranchised constituencies to formally fully participate in
government, in ways that are unique in inclusiveness.

Access.

A major enabling factor in the increased participation of these groups is formal access. The
language used in the governing document, the Plan for a System of Citywide Neighborhood Councils (NC Plan), defines stakeholders broadly:

A Community Stakeholder is defined as any individual who lives, works or owns real
property in the neighborhood and also to those who declare a stake in the neighborhood as a community interest stakeholder, defined as a person who affirms a substantial and ongoing participation within the Neighborhood Council's boundaries and who may be in a community organization such as, but not limited to, educational, nonprofit and/or religious organizations.25

Charter reform participants reported that they specifically omitted any language that
might restrict participation both as a normative aspiration to include all community voices and also as a pragmatic means to avoid a politically fraught negotiation over voting rights. This omission of restrictive voting rights language has had enormous ramifications for the NC system and access to political participation more broadly. Although there have been some notable efforts to extend voting rights in general since the NC system was formed,2627 at the time, it was uncommon for formal public elections to be open to minors, non-citizens, or individuals with prior felony

25 Amended 12/18/13 per Council Resolution
26 Proposition N in 2016 extended the right to vote in San Francisco school board elections to parents of all students, including non-citizens and undocumented immigrants. https://ballotpedia.org/San_Francisco,_California,_Non-Citizen_Voting_in_School_Board_Elections_Amendment,_Proposition_N_(November_2016)
27 Individuals with felony convictions who have completed their prison time as well as parole have been eligible to vote in CA since 1976. However, this did not apply to those under community supervision until a lawsuit was settled in 2011. This settlement enfranchised an estimated 60,000 felons with the right to vote. In 2016, AB 2066 was passed into law, which allowed felons serving their sentences in jail (rather than state or federal prison) to vote. http://www.sos.ca.gov/elections/voting-resources/voting-california/who-can-vote-california/voting-rights-californians/
convictions. As a result, members of traditionally disenfranchised groups have begun to participate in NCs, not just as commenting members of the public, but as voting community stakeholders, board members, and elected leaders.

I think our view was not to preclude them and the argument came up in terms of: “Well, if we make these things formal parts of the government and we create a system of elections, well then how are we to bestow voting rights on people who don’t have it?” I mean we don’t, it’s the State that determines who has the right to vote not us. So we didn’t, I don’t think we were great advocates for immigrants’ rights but just decided, “Ok, let’s leave it as it is.” (Charter reform participant - 09ss)

Critical policy issues affected these constituencies and NCs offer one of few formal venues for them to exercise their voice and contribute substantive input. Furthermore, the purpose of NCs is to cultivate local leadership to elevate indigenous expertise on local matters. Thus, communities especially impacted by these issues can and should elect leaders with lived-experience, or who are strong allies and advocates for affected community stakeholders. This process of organic leadership development reflects the experience of the MacArthur Park Neighborhood Council that has become a strong advocate on immigrant rights issues. The neighborhood has a long history of immigrant organizing particularly around law enforcement harassment and housing rights abuses. Thus, when the NC was established, the NC leadership continued to advocate on these issues. Board members with deep ties to the neighborhood, have friends, family, and neighbors who are affected by immigration issues and the NC agenda reflects that. Meetings are held in Spanish to ensure access to local community members. Similarly, the South Los Angeles Alliance of NCs (SLAANC), which represents NCs with a large re-entry population, has become a venue for organizing around the Ban the Box campaign, and other issues affecting the felony disenfranchised population. Ultimately, the efforts reflect the NC model, an
organic grassroots effort of elevating and including emerging constituencies, rather than a targeted organizing effort around an advocacy agenda.

**Barriers.**

Despite having formal access to a venue and some visibility, members of these new constituencies continue to participate in low numbers. In the NC Plan, ELA is specifically tasked with assisting NCs to conduct outreach in their districts, with added emphasis on areas with traditionally low participation rates. To these ends, ELA engages in practices to support broad participation across the system and foster meaningful inclusion among specific groups.

Despite ELA efforts, there remain major barriers to gains both in broad participation and focused inclusion in the NC system. First and foremost, ELA’s impact is tempered by resource limitations. There are currently 25 staff members at ELA responsible for day to day support, training, administrative oversight, policymaking and enforcement for the citywide system of 96 NCs. Most innovations in participatory and inclusive practices are a means to improve outreach efficiency, build on existing mobilization efforts, and conserve human resources for other essential tasks. Nonetheless, this massive operation frequently struggles to run smoothly, leading to delays in processing administrative matters, miscommunication, and ultimately to a general sense of dysfunction.

Some new constituencies encounter cultural barriers to working with entrenched stakeholders already involved in NCs. With the demographic makeup of boards trending towards older, White homeowners, youth of color, immigrants, and those with unstable housing tend to withdraw in these spaces. NCs that place heavy emphasis on parliamentary procedure eventually alienate stakeholders that place less value on process. This cultural dissonance is highlighted in

179
neighborhoods with rapidly changing demographics. Sometimes this cultural dissonance more closely resembles cultural rupture. Some constituencies avoid participating due to a deep-seated distrust of government. For some this may involve negative experiences with law enforcement, and for others it may evoke a trauma history where the government monitored, oppressed and killed its own citizens.

Perhaps the most pronounced barrier to new constituencies is resistance from current participants. NC boards are elected. Thus, where new constituencies become engaged, sitting board members may perceive a threat. NC board members frequently express concern about their boards being “taken over” by outside groups. Such concerns contribute to efforts to disrupt elections outreach, limit online voting, and subvert ELA’s participatory and inclusive practices.

Participation.

As to efforts to expand participation, ELA has intervened the most aggressively with NC elections. The legitimacy of NCs is based on their connection to their neighborhood: more voters represent a stronger mandate.\(^\text{28}\) Therefore, ELA has approached voter outreach as an opportunity to recruit new participants and potential candidates, and as an opportunity to inform the community about NCs themselves. Furthermore, ELA has supported NC efforts to assign reserved seats on boards to represent certain constituencies, such as a youth seat, a renter seat, or a particular geographic area of the district like Skid Row.

In addition, ELA has tried to expand participation with initiatives, including online voting and innovations in voter outreach, such as proprietary partnerships with NextDoor™ and the LA

\(^{28}\) Not all NCs use elections to select their boards. Several NCs appoint their boards, but this practice is discouraged by ELA for the reasons stated above.
County Registrar-Recorder. These efforts, marred by problems with implementation, received both praise and criticism for their impact on voter participation and participation in the NCs overall. Proponents appreciated how online outreach and voting increased participation by groups that may have had logistical problems accessing the polls, or simply preferred to use online communications media. These groups include youth, young working professionals, and families with young children. Critics disliked how these outreach efforts created new barriers for less tech-savvy voters and also expanded opportunities for participation among less dedicated members of the community who apparently chose not to go to the polls. Some detractors expressed dismay at the possibility that someone could vote in NC elections without ever having attended an NC meeting, and questioned their standing to do so.

ELA also promotes participation through more indirect means. As a City department, ELA works to coordinate and promote collaborative projects between City agencies and NCs. For instance, CleanStreetsLA involves a partnership between LA Bureau of Sanitation and NCs to better clean and monitor neighborhood streets. ELA promotes the program – which leads to concrete and visible improvements in local communities – to drive participation in the NCs.

Inclusion.

In addition to encouraging participation, ELA also supports inclusion and engages in inclusive practices to ensure that all participants are able to maximize their access and opportunity. Each year ELA collaborates with the Pat Brown Institute for Public Affairs to host Civic University, a multi-day capacity building workshop that educates NC board members on Los Angeles municipal processes, and trains them on the most effective means to access the City to advocate for neighborhood projects.
Inclusive practices also allow ELA to target efforts to enhance the quality of participation among traditionally disenfranchised constituencies. In collaboration with the Mayor’s Office, ELA operates Civic Youth, a program to outreach, train and provide on-going support to youth who wish to serve on NC boards. As a diverse City with enclaves of linguistically isolated stakeholders, language access is an issue that affects the operations of NCs. In some areas, neighborhood stakeholders who wish to participate are excluded because they do not have a means to communicate with the NC board. ELA embraces this diversity and encourages NCs to utilize translation services, both for documents and also for meeting proceedings, in order to include all stakeholders.

Due to ELA’s limited capacity, opportunities to support inclusion often arise from disenfranchised groups themselves. In one instance, SLAANC, a regional group of NCs began to see growing concern around California prison realignment, whereby many young men were being released and returned to local neighborhoods. However, due to their prior felony convictions, these young men encountered barriers to finding employment, receiving public benefits, and weighing in on these policy issues. As advocates began to raise awareness on this issue and express interest in including felony disenfranchised participants, ELA facilitated connections between advocates and City agencies working on issues of criminal justice reform.

Boundary Structure.

The Neighborhood Council concept was developed as a broad-based response by local neighborhoods to community disenfranchisement at the hands of the elected City government. The Los Angeles NC system seeks to increase stakeholder access to meaningful participation in local government and improve City services to local communities through the mobilization of local
knowledge. However, the actors involved in the Los Angeles NC system are frequently at odds on which issues they prioritize and the best means to achieve desired outcomes.

Beyond specific policy and process disagreements, some implementation challenges can be traced back to fundamental disagreements about the governance philosophy and the process of integrating the incongruent power structures of a traditional electoral system and a grassroots system. ELA is responsible for the administrative functioning of NCs in their role as chartered City organizations, while simultaneously charged with nurturing a governance system with the more abstract and idealistic goals of “strengthening” democracy through participation and inclusion. As such, ELA straddles instrumental and normative boundaries between various NC system stakeholders. Thus, ELA serves as a boundary structure, an organization that sits at the points of intersection between different groups and translates incommensurate viewpoints among group interactions (Carlile, 2004; Star & Greisemer, 1989; O’Mahony & Bechky, 2008). ELA’s duties to promote stakeholder participation and government responsiveness, and its participatory and inclusive practices to those ends, are at the heart of its role as a boundary structure.

**Boundary: Participation versus Inclusion**

ELA translates incommensurable viewpoints among Neighborhood Councils and the City bureaucracy towards a governance system that can effectively incorporate the knowledge and perspectives of multiple groups. For example, ELA facilitates communication between NCs and City Hall in order to provide substantive community-informed feedback regarding local needs and delivery of City services. Differences in communication style, policy priorities, and understanding of City government frequently necessitate ELA to moderate between NCs and City Hall. In addition, competing priorities among NCs themselves also demand moderation by ELA, which must
help each group to understand the unique needs of other neighborhoods and forge compromises when their advocacy at City Hall becomes competitive.

Also, ELA must arbitrate between existing and new constituencies. This often takes the form of struggles between sitting NC boards, passionate community advocates who have “opted in,” and silent or silenced community stakeholders whose interests may or may not be represented. Some of these groups, particularly immigrants, felony disenfranchised individuals, and youth, encounter resistance to their involvement. So while ELA supports NCs in their current forms, it also works to elevate the voices of all community stakeholders, sometimes at the expense of sitting board members.

The division between new and existing constituencies reflects a representational disconnect at the NC level, between NCs and their community stakeholders. NCs that are effective at including community stakeholders are better at incorporating new constituencies into their work and on to their board. On the other hand, NCs with boards that focus on pet projects do not bother with community outreach or airing their neighborhood grievances. Those NCs encounter more antagonistic relationships with community stakeholders whose needs are not being met. Their board members also spend more time defending their seats from challengers.

A major source of internal NC conflict that reflects neither misunderstanding rules nor grievances against the board is an on-going debate over the definition of NC stakeholder. The NC Plan defines an NC stakeholder as follows:

**Inclusive Membership**

Certified Neighborhood Councils shall be diverse, inclusive and open to all Community Stakeholders. A Community Stakeholder is defined as any individual who lives, works or owns real property in the neighborhood and also to those who declare a stake in the
neighborhood as a community interest stakeholder, defined as a person who affirms a substantial and ongoing participation within the Neighborhood Council's boundaries and who may be in a community organization such as, but not limited to, educational, nonprofit and/or religious organizations (Neighborhood Council Plan, Article 2)

However, since the NC system was established, some NCs have further articulated stakeholder-hood in their own bylaws. For instance, in the Chatsworth Neighborhood Council, the stakeholder definition includes individuals who board their horses in the district. This stipulation reflects the unique nature of that NC district, where equestrian activities are popular and where individuals who may not live or work in the district may have a long-term vested interest. This example reflects a clarification of what it means to “affirm substantial ongoing participation” in the district. Other NCs have attempted to use their bylaws to limit the scope of the stakeholder definition. Some NCs have argued that having children go to school in the district is not a valid claim for being a neighborhood stakeholder. They contend that parents of students have other venues for advocating their interests such as the School Board or the PTA. This concern over unfair access to multiple venues of local representation is even more apparent in the case of individuals who can claim an ongoing interest, and therefore stakeholder-hood, in multiple NCs. Although these individuals are prevented from serving on the board of multiple NCs, depending on the bylaws of the specific NCs, they may be eligible to vote in multiple NC elections.

Other NCs have designated certain seats to represent specific stakeholder groups, and have limited who can vote on those seats to their specific constituencies. For example, only members who live in a certain area can vote for that area representative, or only stakeholders who are active in local faith congregations can vote for a designated faith-based organization seat. While these measures can effectively protect minority stakeholder interest groups from being excluded, they also create logistical complications. Designated seats require voter verification and
can involve multiple forms of identification to verify an individual’s standing to vote for a particular seat. Sometimes these designations are included in the bylaws without consideration for how they might affect implementation procedures, which can be onerous. In 2016, a number of prospective voters were turned away because they did not have the correct documents to verify their standing to vote. In some cases, candidates for designated seats could not demonstrate standing to vote for themselves.

Dissatisfaction with elections typically result in NCs blaming ELA for poor management of the polling place rather than reviewing the requirements in their own bylaws. ELA is required to uphold the specific provisions of an NC’s bylaws. Many recent NC participants may not even be familiar with bylaws that were written well before they became involved. To address election and stakeholder issues, some NCs seek to change their bylaws. However, this can be an involved process as well. The ELA, City Attorney, and ultimately the Board of Neighborhood Commissioners (BONC) must clear all proposed amendments to ensure that NCs do not unwittingly or purposefully make changes that are unethical or illegal. Furthermore, NCs cannot change bylaws within several months leading up to elections. This leaves a narrow window to make bylaws changes. The formal seating of the board, training new members, deliberating over changes to the bylaws, going back and forth with the ELA, the City Attorney and BONC regarding proposed changes, and then voting on the changes all must happen before the next election. Frequently, these deliberations become bogged down within the NC itself, when different neighborhood factions argue over how proposed changes might negatively affect one party or another, or consolidate power within a small subgroup of the NC board.
NCs have also lobbied BONC to further define stakeholder-hood on behalf of the system as a whole. This approach seems to offer the promise of clarity; however, it offers renewed complications. As already demonstrated, individual NCs define simultaneously substantial and ongoing interest differently, according to the norms of their communities. Asking BONC to define this term effectively relinquishes NCs’ decision-making power. Furthermore, it places the responsibility of determining voting rights with BONC rather than allowing them to serve as a neutral arbiter. Finally, creating a more firm definition of stakeholder does not necessarily eliminate this longstanding debate, it would simply push more of these conflicts into another political arena. This begs the question whether it would be worthwhile to become involved in a politically volatile issue, in a way that would effectively narrow access to voting, with little promise of improved stakeholder relations. Ultimately, these types of efforts to limit the standing of stakeholders to participate in NC activities invite a combination of political and procedural complications, and challenge, at their core, the NC system goal of expanding participation.

These sorts of internal dynamics demonstrate that NCs, despite their localism, are not immune from the inherent challenges of representation. There is a recursive tension between ELA’s role serving as a boundary structure among stakeholders and its progressive participatory and inclusive practices. As ELA recruits new participants and new stakeholder perspectives, the task of translating incommensurate viewpoints becomes increasingly complex. This complexity, combined with resource limitations, contributes to the implementation challenges the NC system has encountered. Each new interaction between NCs and City Hall is an opportunity for a new misunderstanding. In fact, ELA staff cites the opportunity to find creative solutions to new and original problems as one of the most compelling reasons to do such demanding work. However,
the very nature of the work is entropic; the more success ELA has at increasing participation and inclusion, the more challenging it becomes to manage the system.

**Boundary practices: Participation versus Inclusion**

The size and diversity of the NC system makes expanding participation itself a barrier to inclusion. The more different stakeholder viewpoints and priorities that are brought into the system, the more room there is for misunderstanding, and the more daunting the task of translating ways of knowing towards inclusive productive collaboration. Thus, ELA must balance participation and inclusion to achieve the objectives of the NC system. This mutually limiting dynamic reflects a boundary between the aspirational objectives and implementation realities for the NC system. ELA’s boundary practices include arbitrating internal NC conflict and fostering stronger connections between NCs and their communities.

**Arbitrating Internal Conflict.** Translation among constituencies takes on a different dynamic as a matter of governance than it does as a matter of policy or process. Differences of opinions regarding policy or process are constitutive practices of democratic governance. Translating worldviews among stakeholders to validate participants as constituencies, on the other hand, marks boundary of democracy centered on the nature of stakeholder- hood. ELA has made advances in its ability to identify the nature of internal NC conflict and discern its nature. ELA’s primary effort involves maintaining a staff presence at as many NC meetings as possible, with a special focus on NCs that are struggling with internal discord. ELA sends field staff, not so much to mediate arguments between NC stakeholders, but to explain and clarify rules or policies that may have a bearing on the particular disagreement. In this way, ELA establishes a shared frame of reference from which NC stakeholders can argue their policy or process issues. In some cases, ELA
staff meets with NC executive board members, or individual members to provide additional explanations or recommendations. These clarification practices serve to distinguish between routine deliberative processes and more fundamental dysfunction within NCs.

Councils for Councils (C4C) is a peer mentorship program established by NC system leaders, particularly members of the Los Angeles Alliance of Neighborhood Council (LAANC). The C4C mentors are a group of NC participants who have held positions of leadership in their own NC and are familiar with NC practices and ELA processes. They are assigned by ELA to struggling NCs, in need of mentorship but perhaps less open to direct involvement of ELA. Mentors provide assistance and training in a variety of areas. One major issue is how to run a meeting that is both efficient and inclusive. C4C was a major asset to ELA during the financial crisis when ELA’s staff was cut substantially. The C4C program has gone through several iterations, but has settled into a role of assisting capacity building for struggling councils before direct and invasive intervention is necessary.

For issues that involve breaking of NC rules, ethics violations, or other allegations of impropriety by the NC board itself, ELA has established a grievance panel process. This process includes a complaint that includes a detailed account of the alleged impropriety, along with witness statements, that are then sent to a panel of representatives from other NCs for review. Panelists may call a hearing where all parties may attend and make their case, before the panel deliberates and renders a decision. ELA developed this peer-based process of arbitrating NC grievances because it engenders more trust from the affected parties than decisions made by ELA. Furthermore, panelists are able to draw from their own NC experiences to offer reasonable findings, come up with workable resolutions, and assign appropriate consequences.
ELA uses several boundary practices to arbitrate differences among stakeholders and promote inclusion of new constituencies. The formal parliamentary procedures that many NCs employ can serve as a barrier to participation and inclusion of new stakeholders. Although NCs are not necessarily required to use such formal procedures, many NCs have adopted the Roberts Rules of Order or other public meeting management procedures, which emulate the formality of commission or City Council meetings. ELA recognizes that these procedures can discourage participation, particularly from youth and non-citizens, and drive away participants from emerging constituencies. To combat this, ELA and the Mayor’s Office have developed a pilot training program called Civic Youth Leadership Academy, which identifies and trains youth board members in NCs located in “transitioning” communities. Civic Youth targets neighborhoods that have experienced rapid demographic changes in the last decade, and whose NC boards may need fresh blood to maintain strong ties and rejuvenate organizing efforts in the neighborhood. In particular, Civic Youth trains youth board members to use these parliamentary procedures, mentors them on NC roles and activities, and provides them with other forms of social support to maintain their interest and “[support] the voice of youth in Neighborhood Councils.”29

As described above, formal meeting procedures are not required by the Charter or Ordinance. The only formal processes required of NCs is a vote tallying and recording process to maintain transparency regarding action items and financial expenditures. Thus, parliamentary procedures reflect an adopted custom. However, NC leaders see little alternative than what is familiar and so they persist with procedures that can discourage participation by community stakeholders or prospective participants. For NCs with divided boards, or with boards seeking

29 http://empowerla.org/civicyouth/cyla/
alternatives, ELA provides recommendations on how to simplify operational procedures or revise bylaws if necessary. It is difficult enough for a diverse group of stakeholders to communicate clearly and productively without the use of parliamentary procedures, which can create additional barriers for stakeholders unaccustomed to working in formal settings.

**Connection.** Expanding participation creates barriers to inclusion through the proliferation of stakeholder viewpoints. Alternatively, inclusive practices can chill participation by focusing NCs’ attention inward. Enacting thoughtful deliberation among a broad collection of stakeholder perspectives can be all-consuming even for routine NC business. In addition, some NC boards prefer to work without broad deliberation and seek to isolate themselves from what can be an overwhelming volume of stakeholder perspectives. As a result, NCs can become removed from their neighborhoods and community stakeholders.

ELA combats this barrier by strengthening the connection between NCs and their communities. First, ELA encourages NCs to engage in community outreach. ELA argues that outreach helps NCs both to conduct their business and also to support their policy agendas internally and with City Hall. Non-board member community stakeholders serve as resources to provide knowledge about local issues, unique perspectives and enthusiasm. Community stakeholders provide the instrumental, substantive, and normative benefits of the Neighborhood Council system, the board simply serves as an instrument to confer these benefits on the City. Some within ELA and the NCs have expressed concern that these roles have in some cases become conflated, with NC boards arguing that they exclusively speak for their neighborhood’s interests and see community outreach as wasted effort. If community stakeholders really cared about the community they would be proactive about becoming involved in the NC. Thus, ELA’s efforts to
encourage NCs to engage in community outreach not only serve to strengthen the relationship between boards and community stakeholders but also to reinforce the relationship between NC boards and community stakeholders as one of reciprocal accountability. NC boards must faithfully represent the interests of their communities, but community stakeholders also have the responsibility to educate and advocate with the NC boards to ensure they are being faithful representatives.

A lot of the times Neighborhood Councils just do. Let’s say I’m a board member and there are eight of us, we might just do what we think is best for the neighborhood instead of actually... I don’t know, taking note of how people feel, what it is that people really want, what it is that people really need. Maybe the community needs the exact opposite of what [I] want. And [my] job is not to go with [my] pride and what [I] think, but to go with what they want. That’s what [I] signed up for. (ELA staff member - 07d)

You pay the bills and whatever it is you do. And be as inspiring as you can. You don’t get to speak for me, you don’t get to go somewhere and tell people what you think I think. You have an obligation. (NC Founding board member on role of NC boards)

In some cases, the reciprocal relationship between NC board and community stakeholders breaks down and community outreach is abandoned. Some NCs even take measures to exclude community participation as a means to deliberately obfuscate board activities, or to preserve their own seats on the board. This dynamic is especially prevalent during election season, when community outreach activities ramp up but board members are running for re-election. In these situations, ELA engages in community outreach on the NC’s behalf, in some cases without their consent. While these efforts highlight and sometimes exacerbate the tensions between the NC board and community stakeholders, they also prioritize the preservation of the system’s governance ideals over the day-to-day challenges with system implementation.
Evolution of Boundary Practices: Stakeholder viewpoints

ELA practices balancing participation and inclusion have changed over the past 17 years due to several factors. First, emerging boundary problems between participation and inclusion have necessitated the creation of new boundary structures. For instance, the limited institutional memory of NC membership has required that ELA begin reviewing and explaining the specific requirements of bylaws, NC system rules, and their implication for NC activities to new members who are not familiar with the history of the NC or the circumstances that led to its bylaws. In addition, the increasing volume and frequency of disputes among board members and between community stakeholders and the NC board have necessitated that ELA develop Councils for Councils (C4C) and the grievance panel. These developments are a direct result of the maturing process of the NC system.

On the other hand, many of the ELA practices reflect an ever shifting balance between the poles of participation and inclusion and less a simple evolution. When a large influx of new participants with limited familiarity with NC practices become involved, ELA works with NCs to enhance inclusive practices. Alternatively, when NC participants become fully indoctrinated in NC processes and lose their connection to the community, ELA works with NCs to boost broad participation of new stakeholders and constituencies. Limited resources for NCs, ELA and the system as a whole preclude lasting substantial expansion of both participation and inclusion. Instead, these practices grow in a mutually limiting fashion, with ELA pushing for alternating incremental improvements in each.
Boundary: Normative versus Pragmatic Goals

In addition to serving as a boundary structure among constituencies, ELA must navigate the sometimes-opposed normative and instrumental demands of its own role. As previously noted, ELA’s normative obligation to expand participation and inclusion is sometimes at odds with the instrumental demands of maintaining a stable and viable system. The NC system is charter approved; so it can be dissolved only through a charter amendment. However, the NC system faces the existential risk of being defunded by City Hall, which would be politically unpopular, or through attrition of stakeholder interest and participation.

The Los Angeles City leadership, and the municipal bureaucracy it oversees, prefer day-to-day stability. Although some elected officials truly value input from their constituents, the norm reflects a preference for dealing with familiar players when operating the City machinery. As a consequence of their unfamiliarity with political decorum or their radical policy demands, new political constituencies that have been traditionally excluded from policy discussions can put elected officials in uncomfortable or compromising political positions. Furthermore, as advisory bodies, the NCs’ only real power is political power, which can be exercised only by targeting elected officials. Thus, when elected officials tire of the frequent and sometimes discordant advice of NCs, they take aim at ELA or the NC system as a whole. As a result, ELA must weigh its goals of enhancing NC participation and inclusion against existential threats to the system those goals may elicit.

In addition, recruiting new constituencies can place ELA at odds with existing participants in the NC system. For sitting board members, new constituencies represent a challenge to the neighborhood coalitions that have controlled NC boards for years. In fact, rather than seeing new
participants as underrepresented members of their own neighborhood and welcoming them into a governing coalition, NC boards often view them as outsiders and take action to circumscribe their status as stakeholders. This competitive dynamic is not itself uncommon in an electoral democracy; however, when these efforts are rebuffed by ELA, some established NC participants become frustrated, suspicious of a system whose institutions appear to work directly against them, and quit. Attrition of effective board members, either through quitting or through electoral turnover, has a major effect on an NC. The day-to-day requirements of operating a quasi-governmental body benefit from experience and collaborative board dynamics. High turnover of board seats or contentious board dynamics, on the other hand, can contribute to poorly run meetings, frozen funds and corrective actions, which can halt NC operations and demand exorbitant amounts of ELA staff time to resolve. Again, as a result, ELA must weigh the stability of the system as a whole against the normative demands of enhancing NC participation and inclusion.

These dynamics are exacerbated by the wide perception among NCs that ELA support and control are antithetical to the NC model. Instead, they argue, NCs reflect the voice of the local neighborhoods and consideration for the system’s ease to manage should not infringe their right to self-determination. This libertarian sensibility is something that ELA must balance with their management practices, or else risk an even more disruptive negative reaction from unhappy NCs. Moreover, there are those among system architects, ELA staff, and City leaders who believe that NC self-determination is a fundamental attribute of the NC system. The degree to which NCs infuse City government with discord is tolerated as somewhere between an inescapable problem and the manageable cost of the benefits the NC system provides. Either way, this perception
clearly pits normative system ideals against implementation challenges that are so disruptive they sometimes threaten the continued existence of the system.

The tension between normative and implementation issues not only affects the NCs, but also threatens ELA. ELA justifies its budget to the Mayor’s office, the City Administrative Officer (CAO) and the Council Legislative Analyst (CLA) according to performance metrics stipulated in the City budget. The broad mission of the ELA is to help NCs to increase citizen participation and improve government responsiveness to local concerns. The degree to which ELA delivers on that mission depends greatly on the definitions of terms such as “participation” and “responsiveness.” Furthermore, performance in each of these matters depends greatly on the cooperation of other entities. For instance, government responsiveness would reflect how well City departments under the direction of City Council respond to NC complaints and policy advocacy. ELA does not have the statutory authority to enforce compliance among other departments, let alone City Council.

Similarly, participation depends on myriad factors from NC dynamics, to neighborhood dynamics, to even the personal circumstances of specific individuals. One NC suffered a major setback in participation and efficacy when a key board member died suddenly shortly before an election (NC board member - 04ss).

Ultimately, ELA is accountable to performance deliverables that are simply approximations of the normative aspirations outlined in the City Charter. In 2014,30 ELA adopted community impact statement submissions as a proxy for government responsiveness performance metrics. However, there is no way to evaluate whether community impact statements, either individually or as a collection, carry any influence on the decision-making of members of City Council.

30 CISs were submitted as early as 2011-12, however, were not documented as a performance evaluation metric until FY 2014-15.
Furthermore, this metric does not reflect the applicability of community impact statements to the work of individual NCs. For instance, some NCs may submit a large quantity of Community Impact Statements because of a policy issue unfolding in their district. Another NC may prioritize other activities. Thus, the CISs do not adequately describe how involved NCs individually or collectively are in achieving government responsiveness, let alone ELA’s role or effectiveness.

**Boundary Practices: Normative versus Pragmatic Goals**

The normative aspirations of the NC system, such as increasing participation and inclusion, can lead to circumstances that compromise the integrity of the system itself. More participation among diverse stakeholders brings new perspectives and priorities into the system. These diverse views, combined with a high level of passion, often lead to conflict among stakeholders. Discord within the system not only stretches the limited resources of ELA, but it also exposes the system to risk of litigation, and can cause City leaders to regard the NCs with an eye to containment and curtailment rather than expansion. Thus, ELA must bridge the gap between normative objectives and threats to the integrity of the NC system. ELA’s boundary practices include political work and performance improvements.

**Political Work.** City departments are apolitical entities, and engaging in formal political activity would be a major breach of bureaucratic norms. However, ELA’s mission to support the work of NCs, expand participation and enhance government responsiveness is inherently political. Increasing participation requires organizing communities around political action. Enhancing government responsiveness involves advocating to elected leaders and politicians to take action in a community’s interest. Furthermore, the NC system’s continued existence, let alone its high-level functioning, requires the support of the City’s elected leadership. Given the discord displayed
within the NC system, maintaining political support involves a sustained advocacy effort. Thus, political activity comprises an important practice on the part of ELA.

[...] the Neighborhood Councils are often the bane of the existence of the Council Members. And so if the Council Members are like: “Oh my gosh, I want to get this thing done but these stinkin’ Neighborhood Councils won’t get off my back!” Then they’re naturally inclined to be less supportive of [ELA] also because the dysfunction that they see in the councils is, you know doesn’t give them reasons to make [ELA] more robust. You know, it’s more like “let’s figure out how to diminish this thing, get it out of my hair.” Because there is a lot of dysfunction in the Neighborhood Councils, it has created an impression, a reputation, a culture that makes [ELA] look bad too because they’re wrapped up in the culture (Elected official staffer - 05cs).

A [City] Council office has a right not to take the advice of the Neighborhood Council. But that just shows you that some of work that Neighborhood Councils need to do to create that political equity or political clout. (ELA staff member - 08d)

In fact, some staffers in City elected offices have backgrounds with the NCs and got their start organizing in those spaces. However, due to the dysfunction attributed to NCs, they find themselves justifying their place in elected offices by downplaying their connection to the NCs and distancing themselves from that dysfunction. This sort of code-switching is also exercised by ELA staff, which take pains to demonstrate their capacity to City stakeholders, while also presenting themselves as down to earth and reasonable when working with NCs. Maintaining these relationships is essential as City stakeholders and NC stakeholders regard each other with skepticism, and thus may turn on ELA if they perceive them as an opponent. Furthermore, any missteps by ELA among NCs may result in NCs going over its head to City Council to get staffers in trouble. This encapsulates the political vulnerability of ELA at all times.

Soliciting participation in NCs is itself a political act, and conducting community outreach can be perceived as a threat by anyone involved in City politics. During elections, ELA recruits, trains, and supports candidates, who represent competition to both NC board members and also
potentially for members of City Council. This can make EAL’s outreach efforts extremely unwelcome, and provides a strong argument for civil service protections for ELA staff.

I think the intent isn’t political. But I think it can be political. Sometimes depending on who you’re dealing with, who they’re working with, and how involved they are within their communities and with their elected officials, because you know the aspirations for a higher position might very well be there. So [...] we actually invite that because that’s what we want, we want engagement, we want people to start again at very local grassroots government. Get involved, know your communities, you start off at Neighborhood Councils and then you realize this is what your passionate about, there’s key issues you’re passionate about. So yeah you’re gonna want to get very political. And then you’re gonna eventually want to aspire to move on to City Council. And... you know you it happens. (ELA staff member - 06d)

Beyond election oriented political activity, ELA engages in direct political work as well. For instance, when NCs express dissatisfaction with a City policy, ELA encourages them to organize around changes they would like to see. When one NC sought to divide into two smaller NCs it found that there was no process by which it could subdivide, so it was not permitted to do it. Even though it was an ELA policy, with City budget implications, ELA staff encouraged the NC to advocate for a policy change with their local City Council person. After several years of advocacy, the change was made and ELA developed a subdivision policy. In that case, ELA supported NCs in advocating for a change of ELA’s own policy.

Although political work outlined above does not comprise a specific category of activities in which ELA engages, it does illustrate the context in which ELA operates and imbues its work with different implications. Whether it is functioning well or descending into discord, the NC system is inherently political and its activities all have concrete political implications for the City of LA. ELA’s role in managing the NC system is thus inherently political as well, whether resolving problems or pushing for improvements. To achieve the NC system’s goals, ELA must balance the political work of the system while maintaining the political support of City leaders and the voting public.
System Performance. The perception of discord and dysfunction is not just a political issue, but it also creates pragmatic problems for implementation of the system. For instance, the demands of political deliberation can be frustrating to NC participants who would like to see more impact, and to City leaders who would like to see smoother operations from a City program. However, some of the normative benefits of the system are opposed to these implementation goals.

What powers does the Neighborhood Council have? What are some things that actually come to the community as a result? Whether formal, pragmatic, like stopping a project or bringing resources to a community. So these are what our idea is pragmatic right? To me, so much of the value is in the intangible stuff. ...Like, stopping a project may benefit a small group of people in the community but if the community didn’t have a chance to talk about how it benefits the community as a whole, it’s rendered somewhat moot. I still get the value on both sides, whether it gets done or doesn’t – totally see that – and that’s part of being a public official is that you’re able to synthesize, right? That’s a huge part [...] I am heavily biased towards the deliberative benefits of democracy. So when people tell me “Oh, Congress is in gridlock! They can’t get anything done!” I say “well, it’s kind of setup in a way to not get things done. Because getting things done has two sides, right? One person got something done, the other one suffered as a result of that getting done. I don’t want a lot of legislation getting passed that discriminates against the LGBT community or minority community, I don’t want that so if that means getting things done, I don’t want it.” So I value just the deliberation. I think most people don’t. And Congress may be shirking its responsibility there too. I’m not saying it is deliberating very well. But if that’s all they do, that’s not so bad for me. Like, we should be all at the local level state level whatever, getting things done too. And federal, we should come together as a country at some point and say this is definitely what we want. It just uh in terms of formal substantive pragmatic, um... that to me is not always the things we should be going after. (NC board member - 02nc)

On the other hand, a distinction can be made between the implementation inefficiencies of the deliberative process and poor management. Although these issues are often conflated, one can and should be addressed, especially in light of the very real consequences the perception of dysfunction has for the NC system. To this end, ELA works to make improvements to system operations. For example, frequent complaints within NC boards led to the creation of a grievance panel system to address conflicts before they became serious problems. In addition, the
automation of NC documentation processes and intradepartmental communications at ELA has helped to streamline operations, leaving more department resources for conflict resolution. Thus, institutional improvements serve not only to address recurrent problems thereby improving efficiency and efficacy, but also to free up resources to address specific NC dysfunctions and combat the perception of systemic dysfunction.

**Evolution of Boundary Practices: Normative versus Pragmatic Goals**

The evolution of ELA’s practices regarding the bridging of normative and existential demands of the NC system reflect as much a shift in attitude as a change in strategy. ELA has moved away from making an idealistic argument for the intangible benefits of the NC system and worked towards improving functionality of the system and allowing NCs to demonstrate improvement. The growth of the NC system has coincided with a downsizing at ELA. As a result, ELA has sought to increase structure, and transfer responsibility to NCs themselves as they make gains in operational capacity. This shift has the dual benefits of strengthening NC voices and realizing NCs’ purpose in grassroots democracy and also disentangling roles of ELA and the NCs, which have until now contributed to the perception of systemic dysfunction.

This evolution in approach to bridging normative and pragmatic objectives also can be seen in how ELA’s metrics have evolved over time. In the early years of the NC system, ELA used performance metrics that documented outputs in the form of meetings conducted, PSAs made, NC inquiries, and NC certifications. These reflect a customer service role, where ELA was evaluated on contacts with NCs rather than on its ability to foster participation or responsiveness. These metrics also reflect the early goals of the NC system, to certify Neighborhood Councils. At that time, the
priority was to get the NC system up and running. It was not possible to capture NC performance in terms of participation or responsiveness with these data.

**INDICATORS OF WORKLOAD**

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<td>37</td>
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*Figure 13 – ELA budget, 2003/2004*

From 2009 until 2014 ELA budgets did not include performance metrics. The reasons for this are unclear, but the omission does correspond with the timeline of the financial crisis at the City, a changeover of ELA General Managers, and a change in Mayors. In 2015, ELA performance metrics changed in two ways. First, ELA framed performance in terms of Mayor Garcetti’s “Back to Basics” priority outcomes for City departments (see Appendix D). Each of ELA’s performance metrics reflects “Priority Outcome 9.”

**9: Partner with citizens and civic groups to build a greater city**
Engage Angelenos in decisions that affect their neighborhoods and their city; seek opportunities and innovative solutions to problems through volunteerism and civic partnerships; foster resident participation in governance and in building shared community.
Also, the performance metrics are comprised of outcomes and justifications that more explicitly reflect NC performance, the objectives of individual ELA organizational units, and the overall goals of the NC system. Although some of the more abstract normative goals of the NC system, such as participation and responsiveness, cannot be measured and presented here, the new set of ELA performance metrics to reflect these overall objectives. NC meeting staffing and processing times reflect ELA efforts to improve service and the performance of the NC system overall. Community Impact Statements and partnerships between City departments and NCs are proxies for government responsiveness.

Table 8 – ELA performance metrics

![Performance Metrics Table]

Los Angeles City Budget Book, 2015
Parsing ELA work in this way also helps demonstrate which units are performing well, which ones require additional support, and which outcomes may not be good indicators of performance. The evolution of ELA’s performance metrics highlights the transition ELA has made over the years to ground abstract system objectives in concrete outcomes to justify their work, and demonstrates the challenge of working within normative and empirical frameworks.

**Major Findings and Summary**

As cities encounter the challenges to governance that accompany increasing size and diversity, they must combat alienation, cynicism, and civic disinterest by providing meaningful opportunities for civic participation. Democratic participation offers substantive, instrumental, and normative benefits to governing institutions and the governed themselves. NCs have potential to strengthen democratic structures by creating participatory institutions and fostering engaged civic attitudes, particularly among previously excluded constituencies. However, NC systems have encountered challenges reconciling the theoretical aspirations and practical realities of governance. The legitimacy of this model of democratic reform is predicated on enhanced participation and inclusion; however, expansion of participation, particularly among new constituencies, exacerbates the challenges of implementing a citywide Neighborhood Council system. ELA’s role as a boundary structure tasked with balancing the demands of legitimacy and structural integrity illustrates the challenges involved in implementing participatory democratic reforms. Furthermore, without ELA’s perennial service as a boundary structure, the idealistic imperatives of participation and inclusion might have been sacrificed in the name of pragmatism.
Significance of Findings

Purpose

This study examines the operations, history, and philosophical premises of the Los Angeles Neighborhood Council system and explores the practices of the Department of Neighborhood Empowerment (ELA). The objective of the research was to illuminate the various roles ELA plays within the Neighborhood Council system, and to articulate its parameters as a boundary structure. This study’s specific research questions are:

- How does ELA engage in boundary practices between the Neighborhood Councils and the City bureaucracy?
- How and why have ELA’s boundary practices have evolved over time?
- How are ELA’s boundary practices shaped by the principles of strong democracy and how do they shape these principles in turn?

This chapter will first present five contextualized discussions, which both address the study’s research questions and also contribute to an understanding of the concepts of neighborhood councils, participatory governance, scale of governance, and boundary organizations. An inductive research approach allowed me to build a conceptual framework from the existing literature, but then to elaborate on existing concepts by contributing original insights from my own analysis. This discussion of contextualized findings will present these connections and their specific significance.

This chapter will then revisit my original research assumptions, and discuss how or whether I maintained or changed those assumptions during the research process. I will then offer recommendations for ELA, the City of Los Angeles, and the NCs on how the findings of this study
might be mobilized to benefit the NC system. Finally, I will recommend avenues for future research, suggest implications of this research, and provide some concluding thoughts.

**Contextualized Discussion**

**Overview.**

The findings of this study elaborate and extend our understanding of a number of concepts outlined in the literature. The Los Angeles Neighborhood Council system has been held up as an exemplar of participatory democracy and a pathway to democratic governance reform for large cities. ELA serves a central role in managing the NC system. This study provides new insight into the role and practices of both ELA and the NC system as a whole. In particular, this study expounds on the role and operations of Neighborhood Councils and other formalized community-based structures, the essential dynamics of implementing participatory governance, how the scale of governance is entwined with structures of power, and how ELA functions as a boundary structure across new and different thresholds of governance. The contextualized findings are as follows:

**Table 9 - Overview of Contextualized Findings**

<table>
<thead>
<tr>
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<th>NCs are an evolutionary process of governance, not a solution to a governance problem.</th>
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<tr>
<td>2.</td>
<td>Power, both formal and informal, plays a central role in ELA practices and NC system dynamics.</td>
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<tr>
<td>3.</td>
<td>ELA plays a central role in moderating the conditions of democratic governance.</td>
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<tr>
<td>4.</td>
<td>ELA functions as a boundary structure across multiple boundaries simultaneously.</td>
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<tr>
<td>5.</td>
<td>ELA functions as a boundary structure between system implementation and aspiration.</td>
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Discussion 1: NCs are a process of evolution, not a solution to a problem.

Activists and scholars alike have documented the ills of public choice and economic rationality models of public administration that have accompanied the massive growth of municipal jurisdictions over time. These approaches to governance contribute to various governance problems such as inappropriate impact of interest groups on political decision-making (King, 1999), unethical entanglement between politicians and interest groups (Parlow, 2008), and the centralization and bureaucratization of government resulting in barriers to access for the public (Deleon & Deleon, 2002). These governance problems are accompanied by social problems such as mistrust of the government apparatus (Nye, Zelikow, & King, 1997), political cynicism (Berman, 1997), civic alienation (Pharr & Putnam, 2000), and a decline in public participation in the process of self-government (Cooper & Kathi, 2005).

These challenges spurred a movement to strengthen civic engagement at the local level and establish more neighborhood oriented governance structures (Cooper & Musso, 1999). Proponents argue that civic engagement offers substantive improvements to public policy, instrumental improvements to the operations of the government apparatus, and the normative benefits of the lay citizenry weighing in on public decisions that affect them (Campbell & Marshall, 2000; Pratchett, 1999; Fiorino, 1990). Since the mid-1990’s concepts such as civic engagement, neighborhood governance, participatory democracy, and community empowerment have become mainstays of the participatory democracy reformer lexicon.

In this context, neighborhood councils have been proffered as a solution to the governance problems associated with over-extended representative structures (Parlow, 2008). NCs offer benefits in the form of venues for local deliberation, organizing space for local stakeholders, and
neighborhood-embedded access points to city government. However, NCs also introduce new challenges. Looking at NCs themselves, there are issues with NIMBYism, concerns with equity - amplifying loud voices rather than elevating quiet ones, and failure to reduce power imbalances within cities rather than expanding them.

Beyond the challenges with NCs themselves, there are broader systemic issues. For instance, there are inherent tensions between formal and grassroots structures. Grassroots structures are built on the generative deliberation of engaged neighborhood stakeholders; these processes have open ended timetables and follow whatever trajectory the participants deem appropriate. On the other hand, formal structures adhere to operational norms and routines, timelines, process rules, performance requirements; these processes are highly routinized to maintain accountability and operational consistency. Furthermore, grassroots approaches function from an external oppositional perspective, whereas formal approaches function from an established insider perspective. The juxtaposition of the operational constraints of formal structures and the operational freedom of grassroots structures introduces fundamental stresses to a conjoined structure like the neighborhood council system. These stresses manifest in problems outside of the neighborhood council system itself, in collaborative work with other departments, broader civic engagement efforts and within political spheres.

In addition, neighborhood councils represent both a venue for participation and a vehicle for inclusion. NCs offer an access point for participation in policy discussions, and also a space where stakeholders of diverse interests and capacities can all engage and contribute. However, there is a tension between participation and inclusion as well. The more participation the more challenging it is to maintain inclusion, both in terms of the logistics of managing resources and also
in finding baseline operating coherence among so many diverse perspectives. These challenges highlight important implementation considerations that must be taken into account for formal neighborhood council systems to function properly. In addition, these challenges offer a stark rebuke to the notion that neighborhood councils represent a “silver bullet” for the socio-political ills associated with metropolitan governance. Moreover, given the number and type of new challenges NCs introduce into the governing apparatus, there is reason to caution against regarding NCs as any sort of solution at all.

Instead, NCs should be regarded as a stage in the evolutionary process of democratic jurisdictions. Both the vulnerabilities of a disconnected representative democracy super-structure and the strengths of participatory local democracy derive from the same principles. Democracies work best when the citizenry is engaged, when there are strong governing institutions that promote participation, and when there are strong relationships between representatives and their constituents. “The greatest distance in the world is that distance between city hall and the people they serve” (Charter reform participant - 07ss). NCs reflect a recalibration of this scale, making these relationships closer. “It’s been a mechanism to make LA feel smaller I think. In a way, that’s appetizing as something that’s positive that’s making it feel smaller in what would otherwise feel so massive” (elected official staffer - 05cs). This is not just a matter of governance scale. NCs serve to move a new cohort of representation into City Hall. The formerly excluded public has been brought into the government, and with them, new policy ideas, new deliberative processes, important local knowledge, and new networks of community stakeholders. As a result, the frontier of the government has been pushed further afield. Representation issues, participatory access
issues, and parliamentary process disconnection all now transpire between NCs and their local community stakeholders.

Integrating NC practices into existing governance processes, and adapting long-standing city processes to be more participatory and inclusive, is part of the growing pains of the “adolescent phase” (ELA staff member - 08d) of such a major reform. These changes shift intra-City power dynamics, change organizational processes, introduce new types of stakeholders, all of which introduce disruption to the conduct of City business. These disruptions are easy to blame on ineffective or incompetent NCs, or failure of reform to solve governance problems. However, a clear definition of the role of NCs allows stakeholders to properly frame their expectations within the reform process and to understand such disruptions not as the NCs’ failure to deliver on the abstract promises of civic engagement reform, but as a new venue for the perennial tension between participatory and representative democracy.

Discussion 2: Power, both formal and informal, plays a central role in ELA practices and NC system dynamics.

The charter reform efforts of the 1990s were prompted by a struggle for power. There were two fronts to the power struggle: the Los Angeles Mayor versus the City Council, and local neighborhoods versus City Hall. The reform efforts, although connected, responded to different impulses. Mayor Riordan, who campaigned on a platform of improving government efficiency, wanted to consolidate more power in the executive branch of LA City government and take control of City departments away from City Council. At the same time, anti-City Hall forces in the San Fernando Valley were pushing for better local representation, and diffusing power into the neighborhoods.
Both facets of this power struggle were carried into the charter reform process. The Mayor and Council each created a Charter Reform Commission, one elected under the Mayor’s auspices and one appointed by the City Council. Charter reformers also pushed for the diffusion of power in the form of Area Planning Commissions and the neighborhood councils. One proposed charter amendment further proposed expanding the City Council to 25 seats, up from 15, which would have shrunken council districts and reduced the number of constituents per councilperson. However, voters decisively rejected that provision, disturbed by the notion of more politicians more than they were inspired by the possibility of better representation.

Ultimately, despite creating the Area Planning Commissions and NCs, the new Charter is widely considered a power consolidation for the Mayor’s office (Charter reform participant - 05ss). The NCs have no formal powers, a point that was hotly debated between the two Charter commissions (Charter reform participant - 04ss), and the City Planning Commission and City Council review decisions of the Area Planning Commissions. The NCs and APCs reflected extensions of the governance apparatus into the neighborhoods, but did not actually move the structures of power into the neighborhoods with them. Thus, what began as a battle over power became a reform about the scale of administrative governance, and conversations about the virtues of neighborhood councils and participatory democracy have largely reflected that orientation. Neighborhood scale of governance allows for more local expertise (Innes & Booher, 2010; Wynne, 1996), better designed and therefore more responsive local services (Bachrach & Botwinick, 1992; Irvin & Stansbury, 2004), and rebalances the focus between citywide and local perspectives (Ostrom, Tiebout, & Warren, 1961). Based on the the politically fraught context of the Los Angeles reform process that rejected efforts to give NCs formal powers, and analogous
reform processes elsewhere, the literature has largely discounted the potential of NCs to fundamentally alter the structures of power.

What NCs were denied in formal decision-making powers, they have developed in grassroots political power. In many ways, NCs conduct their advocacy in the same manner as other external grassroots organizing groups. NCs use their platform as City certified groups to mobilize community members to weigh in on policy debates. They use the Community Impact Statement process to document their own official responses to City Council actions. They organize and coordinate with other NCs, in the form of NC alliances, and community groups to more forcefully advocate for shared needs. They typically posture as outside interest groups, but also make use of their City affiliation to facilitate access to City leaders. NCs have expressed this political power in City electoral politics, local ballot measures, and in raising the profile of local concerns. Efforts addressed issues such as the Porter Ranch Gas Leak, which resulted in a meeting with Governor Jerry Brown, and fracking in South Los Angeles, which resulted in numerous town hall meetings with elected officials.

In the last 17 years, the NC system has evolved to manifest a substantial and largely unanticipated political potency. As a result, ELA has had to adapt its role as manager and facilitator of the NC system to accommodate this political evolution. ELA, an apolitical civil service department in the City bureaucracy, has become engaged in political activity. ELA has formal power over the NCs, and is empowered to intervene if NCs do not conform to appropriate modes of conduct. However, it is appropriate for NCs to engage in political activity, and is, at least in part, the premise for their existence. This places ELA in an awkward position between NCs and the typical targets of their political advocacy: City leaders. City leaders generally avoid ordering ELA to quash NC political activity, as that would be a politically unpopular action, and instead leave ELA to
interpret and negotiate the limits of appropriate NC political activity. Similarly, NCs look to ELA for support when they believe City leaders have overstepped in their efforts to curtail NC political activities.

The tenuous political atmosphere surrounding the NC system demands that ELA use a light touch to oversee NC activities – to minimize the possibility of alienating any of its stakeholders, or allowing NC-City relations to devolve into completely unproductive political blood-sport. ELA takes a primarily facilitating role “to help polish their advocacy tools of NCs” (ELA staff member - 10d). However, when City Hall and the NCs are in complete opposition on an issue, sometimes ELA must become directly involved. When NCs create too many political headaches for City leaders, ELA is called upon to negotiate and smooth over disagreements. When city leaders occasionally overstep their authority to circumscribe NC actions, ELA occasionally subverts the directives of city leaders in favor of their chartered mandate to improve participation and improve government responsiveness.

Given its precarious position between highly political entities, and the dependence of the NC system on ELA’s active mediation, ELA is in both a compromised and critically essential position. ELA must advocate for its needs to City Council regardless of its on-going participation in political activities. Furthermore, ELA must work within a civil service framework that both protects ELA staff from political retribution and also complicates its ability to be an effective moderator. Thus, ELA must not only balance the political power struggles between City Hall and NCs, but must do so while balancing its own political security and the overall efficacy of the NC system. These political factors, and the expressions of power they demonstrate, contextualize every aspect of ELA practice. How NCs, and the City entities that manage them, interact with both formal and informal
structures of power should be more directly addressed in the theory and implementation of NC systems in democratic reform efforts.

**Discussion 3: ELA plays a central role in moderating the conditions of democratic governance.**

While charter reform and the development of the Neighborhood Council system were meant to enhance strong democracy in Los Angeles, with whom the responsibilities of enacting the principles of strong democracy fell were not well articulated. Elected City leaders maintained their responsibilities to execute the will of the constituents they represented to make policy and execute the business of the City. NCs were assigned the responsibility to advocate for local communities and promote the interests of their neighborhoods, sometimes over the interests of the broader City. Thus, elected City leaders and NCs participate on opposite ends of the spectrum of representation and advocacy in the democratic framework. ELA occupies a role between City leaders and NCs, balancing the smooth operations of the City against the mission of strengthening the voice of local participants. Furthermore, ELA’s mission outlines its responsibility to expand participation and improve government responsiveness, principles of strong democracy. In this way, ELA serves as an arbiter for the participants in the governance system, but also moderates the conditions of democratic governance overall.

In the years since charter reform, NCs have become established City groups. They have developed operating processes, specific advocacy practices, and routines for conducting meetings. In many ways, they now function as small city councils (Charter reform participant - 07ss). With this transformation, NCs encounter issues similar to those City Hall encounters with representation and distance from community stakeholders. Because ELA has direct oversight of the NC system, the department has a responsibility to manage the relationship between NCs and their community
stakeholders as well. ELA supports community outreach efforts among and on behalf of NCs, as well as other means of capacity building and support to get more community participation and inclusion. As the boundaries of the City governance structure are pushed further afield, ELA takes a more active role in managing it.

In terms of expanding the boundaries of the City governance structure, ELA takes two approaches. First, NCs identify and engage in practices to improve participation and responsiveness and either advocate with ELA for support, or ELA notices their efforts and steps in to support. There are numerous examples of this approach. When a group of NCs in the San Fernando Valley wanted to meet together to discuss and organize around regional issues, ELA initially balked at the possible logistical issues such as Brown Act compliance. However, after it became apparent that this format held potential to effectively mobilize NC political clout, particularly in its ability to elicit government responsiveness, ELA supported the alliance efforts. This has become a mainstay of NC practice. Similarly, as NCs began to engage directly in policy advocacy, both on Council actions and on ballot measures, ELA worked with the City Clerk to develop a platform to amplify NC advocacy. They came up with the Community Impact Statement system, which collects NC statements of support and opposition and documents them on City Council agendas for elected leaders to see prior to taking a vote. The CIS program also highlighted problems with the Council file numbering system that made it difficult for members of the public to track pending legislation, leading to changes that improved public scrutiny. These ELA efforts were all prompted by and built upon NC initiatives, and demonstrate the value of NCs in enacting strong democracy.
The other approach that ELA takes is to identify needs and then unilaterally push for new practices or initiatives. The mission of expanding participation and government responsiveness and other principles of strong democracy are not the primary function of elected representatives. Nor are they the primary focus of NC operations; NCs do not so much engage in strong democracy as they do enact it. Thus, it sometimes falls to ELA to push for these efforts when neither City Hall nor NCs are interested or invested. An important example of this approach is the pilot effort for online elections. City Hall was at best ambivalent about using online elections for the NC system. On the one hand, it was an expense system to bring online. However, the relatively small investment in the NC system could provide valuable product testing for a possible rollout to more important citywide elections. The risk of election problems posed to the NC system seemed like a small price to pay.

Some NCs, on the other hand, were strongly opposed. Only 34 of the 96 NCs opted to use online voting. Beyond the logistical challenges of registering and voting, many NC participants saw online elections as a direct threat both to themselves and also their constituencies. Many current NC participants have been involved for the entirety of the system’s life, and older, White, retired participants are overrepresented. Online elections seemed to invite more participation from groups that did not currently participate and had a more comfortable relationship with technology. This includes young people, people of color, and those too busy to attend regular meetings, such as working professionals and young families. Although excluding these groups may not have been a purposeful motive of existing NC participants, expanding participation among those with unknown interests and affiliations certainly caused concern and drew sharp opposition.

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32 ELA collected 2065 post-election surveys, with 24% expressing dissatisfaction with the registration process, 23% with election outreach, and 10% with quality of candidates. 44% of elected board members were non-incumbents.
However, ELA was resolute. It saw online elections as a way to boost typically miniscule NC voter turnout, increase interest in the NC system, and more actively recruit from untapped communities, all categorical benefits that pushed the boundaries of democratic governance outward. Furthermore, using the NCs to test an important election process would provide an important service on behalf of the City as a whole and raise the profile of the NC system (Former ELA GM - 07ss). The online election initiative did encounter challenges with implementation. The variety of election guidelines among NCs caused considerable logistical challenges, which were exacerbated by the confusion that accompanied the change. These difficulties resulted in several high profile election challenges, the formation of a grievance panel to arbitrate the challenges, which itself drew criticism, and an outcry from elected City leaders who felt duped into investing in an expensive system that ELA seemed incapable of deploying properly.

Regardless of whether this implementation of online NC elections can be considered a successful outcome, ELA’s responsibility is to try to expand participation and government responsiveness and thereby strengthen democratic governance. Furthermore, developing and executing policy is typically the responsibility of elected City officials. However, when it comes to matters of governance in the City, ELA plays an important role in creating and implementing policy. ELA’s centrality in this function is fascinating, especially considering how far outside the typical exclusive venue of the City Council policy development process ELA is positioned.

Discussion 4: ELA functions as a boundary structure across multiple boundaries simultaneously.

Given the context of ELA’s creation and the wording of its mission, it was clear that ELA’s purpose was to serve as a boundary organization between the City and the NCs. The architects of
the system recognized that there would be some discrepancies between the perspectives of community-based NCs and the City bureaucracy. ELA’s purpose was to facilitate these groups’ interaction towards productive integration. Since its inception, ELA’s role as a boundary organization has proven more multifaceted than anticipated, adding layers of complexity to its work. Furthermore, boundary structures, organizations, and objects vary in the scope of their mission. Although some of these boundary structures have distant time horizons for the completion their work, few are intended to persist indefinitely like ELA. Understanding how ELA manages multiple boundaries simultaneously and its open-ended mission are critical to developing the proper organizational structures to support its work and fulfill its mission.

The boundary literature acknowledges that many boundary organizations work within complex spaces and must engage across multiple boundaries simultaneously. Specifically, boundaries across ways of knowing involve engaging not only participants’ knowledge, but also their beliefs and values. Star and Greisemer (2009) describe the UC Berkeley Museum of Vertebrates’ use of boundary practices to generate a new set of collaborative norms that allowed museum curators, researchers, wildlife trappers, and environmentalist boosters to work towards shared goals. Although this effort reached across multiple boundaries, including vocation and motive, the scope of the collaboration was relatively narrow, encompassing only specimen collection techniques. Furthermore, the goals of the boundary work were shared sufficiently that participants had more to gain by working together than not. O’Mahoney and Bechky (2008) similarly describe a narrow collaboration between a large corporate software developer and a small open-source developer. In that case, the fundamental philosophies of the organizations were at odds, but a narrow and explicitly limited collaboration suited the overall goals of each. As
software developers, these parties already shared norms of communication and understandings of the product on which they were collaborating. Thus, the philosophical boundary represented the main obstacle, and one around which they were able to work.

Unlike these examples, ELA spans multiple boundaries simultaneously. In managing the relationship between NCs and the City, ELA must bridge policy boundaries, such as citywide versus local, substantive policy differences; bridge process boundaries, such as city bureaucracy, centralized versus decentralized, and departmental staffing; and bridge fundamental philosophical boundaries, such as participation versus inclusion, or normative versus pragmatic system goals. Moreover, the boundary work involved in each may at any given time undermine efforts elsewhere. For instance, ELA’s efforts to address a policy dispute or to bring processes into alignment may be undermined by an established city operational process or may exacerbate a philosophical disagreement. Although other examples of boundary organizations have experienced greater and lesser degrees of success in bridging divides, there are few examples of boundary organizations where success was measured based on how well the organization balanced competing bridging efforts on an indefinite basis.

Epistemic community literature addresses how to work across multiple boundaries simultaneously. In particular, international policy coordination provides an apt example because it involves developing technical policy solutions to complex problems among parties with myriad cultural, political, and strategic interest boundaries. Adler (1992) describes how American and Soviet actors developed a set of practices to enact nuclear arms control protocols that circumvented their irreconcilable differences to serve their shared goals of avoiding nuclear war. Haas (1992) argues that epistemic communities are groups with shared normative principles,
causal beliefs, notions of validity, and vocational practices. In the face of policy problems that lack an effective epistemic community, such as international crises regarding ozone depletion or nuclear armament, new epistemic communities must be developed to address these concerns. By engaging in new practices, international collaborations can bring diverse interests into alignment on particular policy issues, and re-contextualize the conceptual framework by which they evaluate reality (Antoniades, 2010).

The epistemic community concept well describes some dimensions of ELA’s role. Achieving policy outcomes in the form of government responsiveness is one of ELA’s primary goals, and in most cases requires a sustained boundary bridging effort between the different ways of knowing of the City and NCs. On the other hand, ELA has the broader mission of encouraging stakeholders in the NC system, including NC participants, city staff, and city elected leaders, and even general residents of the City, to re-contextualize their cognitive framework to appreciate and validate the philosophical importance of the NC system and participatory democracy in general. One of the key differences between ELA’s role and that of an epistemic community is its open-ended time horizon. Epistemic communities typically form around a major policy problem, and serve to shift conceptual frameworks to the degree necessary to achieve those ends and maintain them. Upon completion of this policy effort, the epistemic community becomes assimilated into durable organizational structures of dominant social constructions of knowledge and lose the coherence brought by their primacy of their former role. Their achievement is to dissolve into the dominant episteme.

ELA, on the other hand, can facilitate policy outcome after policy outcome and has yet remained a central facilitator between multiple actors for an indefinite period. It is unclear
whether the open-ended time horizon for ELA’s work reflects a lack of progress towards assimilating the principles of the NC system into the dominant conceptual framework, although that certainly has not yet happened, or that ELA, as an organization working across so many different boundaries at once reflects a fundamentally different type of boundary organization than those described in the literature. The multiple boundaries and open-ended time horizon stand in contrast to the temporary working partnerships (Star & Greisemer, 2009; O’Mahoney & Bechky, 2008) or the strategic policy interventions of epistemic communities (Adler, 1992; Haas, 1992; Antoniades, 2010). These critical differences make it more difficult for ELA to claim success in achieving its mission, or even to demonstrate progress. Furthermore, these differences make it more difficult for ELA to advocate for the importance of its work, and leads to losses in confidence in the system by stakeholders who cannot see improvement. While ELA may not be suited for the time-limited format of an ad hoc international policy intervention effort, additional structure and role definition could benefit its work and its mission.

Discussion 5: ELA functions as a boundary structure between system implementation and aspiration.

Previous research on boundary structures and boundary organizations typically examine groups that foster collaborative governance (Agranoff & Maguire, 2003, Feldman, Khademian, & Quick, 2009) and groups that bridge conceptual boundaries between stakeholder groups with different policy priorities and process routines (Cash & Moser, 2000), different types of knowledge (Carlile, 2002), and different ways of knowing (Star & Greisemer, 1989; O’Mahoney & Bechky, 2008). In addition, the literature describes how boundary structures bridge implementation boundaries with practices including ideas of transfer, translation, and transformation (Carlile, 2004). The literature also describes boundary organizations as entities that work at points of
juncture, where collaboration can occur despite or while purposefully maintaining differences (Quick & Feldman, 2014).

The preceding essay, Discussion 4, describes how ELA embodies a number of these boundary roles. However, this study extends that conversation to include other dimensions of boundaries and boundary structures. For instance, the NC system illustrates a constitutive bounding process, and its effects on communities. Furthermore, this study introduces a conversation about the role of ELA in bridging between pragmatic and normative goals. As described in Chapter 7, ELA’s mission involves balancing at times juxtaposed objectives of maintaining the operational integrity of the NC system with its aspirations for democratic reform. This represents a different type of boundary and thus illuminates new dimensions to the concept of boundary structure.

In this case, revisiting Abbott’s (1995) seminal conceptualization of boundaries is instructive. Abbott describes boundaries as constitutive of entities. This conceptualization is particularly apt in describing the creation of the Neighborhood Council system in that Neighborhood Council districts introduced the boundary lines that delimited these spatial, cultural and community entities. In some cases, these reflected informal but widely-recognized geographical perimeters, but in other cases, districts either encompassed multiple neighborhoods or divided communities. Thus, creating the district lines created the bounded entity and laid the parameters for that entity’s relationship with its community and City Hall. Some communities have benefited from being “created” in this way, as certification strengthens their claim for community coherence in the eyes of others, an important legitimizing force. However, other communities have been rendered invisible. Skid Row, home to the largest concentration of
homeless individuals in the United States, is a neighborhood with unique interests and acute needs. It has almost nothing in common with the rest of downtown Los Angeles, and yet the neighborhood is stuck within an NC district dominated by financial and developer interests. In this way, Skid Row has been erased by the constitutive process of bounding.

The constitutive properties of bounding also provide a useful lens with which to examine ELA’s role as a boundary structure between pragmatic and normative goals. The process of the NC systems formation, including that of ELA, was chaotic and involved substantial compromise to different parties’ visions. Thus, ELA’s role has always been obscured by the varied and seemingly contradictory duties involved with supporting and assisting NCs, and also administering City processes and enforcing City policies. The practices that ELA developed to help itself discern and navigate the different dimensions of its mission have not only revealed this boundary but served to establish it. ELA’s mission to enhance strong democracy, sometimes at the expense of the interests of individual NCs or the City’s elected leadership, has highlighted the politically precarious position of ELA within the NC system and the City. ELA’s efforts to streamline organizational processes, insulate staff from political interference, and simplify decision-making have served to create a gulf between ELA’s juxtaposed obligations.

Quick and Feldman (2014) present the concept of boundary as juncture, which argues that collaboration across boundaries is made more resilient by not only seeking out commonalities, but also by removing the focus of the relationship away from the constitutive differences between entities. Because the pursuit of strong democracy can sometimes have a destabilizing effect on NC operations, and vice versa, ELA’s efforts to balance these roles are critical to its mission. When ELA expropriated fiscal collection duties to City Clerk or created an NC-led grievance panel, they
were able to unlink the roles of administrator and system advocate, allowing each to flourish. By focusing organizational attention on the ways in which system maintenance and the principles of strong democracy can support each other, and avoiding situations in which they undermine each other, ELA is able to foster resilience in its role as a boundary organization and enhance its work in both capacities.

The essential nature of managing this boundary to ELA’s mission is an important detail that was not thoroughly considered when the NC system was created. In fact, the ability to effectively manage this boundary is important not only to ensure fruitful collaboration between roles and the proper functioning of the NC system, but ultimately also to ensure that the politics of the NC system remain positive. Too much dysfunction in the NC system invites political disapproval, which in turn creates new and additional barriers to the proper functioning of the system, as well as difficult existential arguments about the importance and virtue of strong democratic structures. Although this essay treats system functionality as an implementation issue, within political circles financial accountability is as firm a categorical imperative as strong democracy.

The ELA’s boundary practices bridging its administrative and aspirational roles are instructive for other municipalities seeking to establish structures similar to the NC system. There may be no better place for this boundary work to be conducted than an apolitical City department. City elected leaders seem less committed to abstract democratic ideals than the concrete realities of governance, and rightfully so. Similarly, NCs seem less concerned with the administrative details that allow the NC system to operate than they do with embodying grassroots advocacy. However, not all City departments are well suited either in structure or staff to engage in this work. Since its establishment in 2000, ELA has restructured its administrative operations multiple times, and has
restructured and re-trained its staff substantially as well. Furthermore, these changes are likely to continue, as the department must continuously adapt to the ever-shifting tension between administrative and normative dynamics of the NC system.
Conclusion

As Frank Gibney said, “the United States is a great idea, but it’s not necessarily a great country.” (NC system stakeholder – 06ss)

The purpose of this case study was to examine the role and practices of the Department of Neighborhood Empowerment as a boundary structure within the Los Angeles neighborhood council system. Findings emerged in four principal areas: ELA contextualized history, policy boundaries, process boundaries, and philosophical boundaries. These research findings contributed to five contextualized discussions: 1) NCs are a process of evolution, not a solution to a problem; 2) power, both formal and informal, plays a central role in ELA practices and NC system dynamics; 3) ELA plays a central role in mediating the conditions of democratic governance; 4) ELA functions as a boundary structure across multiple boundaries simultaneously; 5) ELA functions as a boundary structure between system implementation and aspiration.

Revisiting Research Assumptions.

In the introductory chapter, I presented three assumptions about the context for the study that I carried with me into the research process. First, I introduced the assumption that governing power is highly concentrated in Los Angeles. Although this assumption was born out to a certain extent because the Council President and the Mayor each hold tremendous decision-making and political power, the study revealed some nuance to this understanding. Although NCs themselves have no formal power, they have made inroads in reshaping City power dynamics. For instance, NC leaders have run for higher political office in the City and have won competitive races. Sitting City Councilmember, David Ryu, along with the City Controller Ron Galperin, are former Neighborhood Council board members. And although these individuals had political connections prior to serving on their NC boards, and cannot really be described as populist candidates thrust
into office, their affiliation with NCs and continued relationships with NCs represent the role that NCs can play in legitimizing candidates’ community ties and in mobilizing voters. This dynamic also realizes a general fear of City politicians that NCs provide a training ground for future political competition. Although formal decision-making power is retained in the highest reaches of City Hall, NCs have an amplified voice within their communities. Considering the low voter turnout and generally thin civic engagement, NCs can wield outsized informal political power. This power was not apparent from preliminary research planning conversations, where NCs were typically regarded with a dismissive attitude.

Second, I introduced the assumption that there is a diversity of views regarding NC system. This assumption was also largely borne out. Informants shared a broad variety of perspectives on the purpose, effectiveness, role, and best and worst practices of the NC system. However, I also found that regardless of stakeholder group and almost without exception, informants shared a general sense of optimism about the NC system. This was an unanticipated finding. I assumed that different informants’ perspectives would be oriented to how effectively NCs met their needs. Thus, participants in highly effective NCs would regard them more positively than aggravated City officials of participants in ineffective NCs. On the contrary, nearly all informants think that the idea of the NC system is a good thing and that despite implementation issues, its presence contributes something positive to City governance.

Finally, I introduced the assumption that the NC system was a politically sensitive topic. This assumption was true in some ways. For instance, some informants were thoughtful or even guarded about how they participated in interviews. This was particularly the case among staffers for elected officials who did not want their personal perspectives to result in political blowback on their bosses. However, I also found that participants wanted to share their views. I believe this
was in part because they had concrete recommendations for how problems with the system could be addressed and felt that this study might be an affective vehicle to present them. Furthermore, I believe that participants wanted to share because they all believed in good governance and, to varying degrees, in participatory democracy. As such, the NC system was a topic that elicited passionate responses despite its political sensitivity and the potential vulnerability of this study’s informants.

Recommendations.

The findings of this study present several recommendations for Los Angeles as it continues to build out its Neighborhood Council system. Findings also provide recommendations for other cities that are considering an effort to develop their own iteration of a neighborhood council system.

First, my findings suggested that operational capacity of NCs affected perceptions of the system overall. Specifically, NC dysfunction caused frustration among NC stakeholders, loss of confidence among City stakeholders, and tremendous amounts of work for ELA staff. Operational capacity was in turn dependent upon the consistency of organizational structures and routines established either in ELA policies and processes or individual NC bylaws. Increased consistency in bylaws across the system would reduce the workload of ELA to track the minute differences among the 96 NCs and reduce confusion among NCs. NC stakeholders and system stakeholders have expressed reservations at the prospect of curtailing NC autonomy by writing bylaws as a threat to the premise of local governance. However, dysfunction can be immobilizing. Some NCs are unable to engage in any work beyond the process of their own administration, and have become “slaves to [their] own freedom” (NC board member - 08NC).
In this case consolidation of bylaws offers substantial benefits in reducing confusion, restoring trust, and improving the overall functioning of the system. I recommend developing three basic sets of bylaws, each reflecting the most popular configurations for basic elements such as elections processes, board composition, and board responsibilities. NCs can then choose from among these three basic frameworks and make elaborations that reflect their own communities. This way, NCs and ELA benefit from basic consistency, and NCs are able to build out a unique set of governing practices from a stable framework. For jurisdictions seeking to develop a new system, I would recommend creating a single set of bylaws for their NCs to use, and encouraging NCs to express their unique perspectives and interests through their activities and advocacy rather than their governing documents.

Second, I would recommend revisiting the metrics by which ELA’s performance is evaluated. ELA is a unique entity with unique responsibilities. These responsibilities involve working with abstract concepts, such as “civic engagement” and “government responsiveness,” and are challenging to describe and even more challenging to quantify. As a result, ELA’s performance metrics are more oriented towards quantifiable outputs or outcomes that only imprecisely document the impact of its efforts. This results in staff dedicating time to activities that do not directly contribute to its mission, diluting ELA’s impact, and ultimately leading to mission drift.

I recommend that ELA be allowed to submit their budget requests with a narrative justification that would better enable them to explain how their activities support the mission of expanding participation and enhancing government responsiveness. This would also better enable ELA to describe more nuanced activities, such as efforts to battle inequities among NCs, which may
not be effectively captured in numerical outcome measures. Under the current evaluation process, ELA activities can become constrained by outcome measures that do not necessarily reflect ELA’s primary mission and that are divorced from the more abstract goals they are intended to achieve. Not only does this have the potential to encourage “chasing numbers” at the expense of potentially more impactful activities, but it also has the potential to frustrate NCs that feel ELA is pushing them to work in a manner that is unproductive or irrelevant to their individual goals. More qualitative evaluation and budget justification criteria would allow ELA to pursue more nuanced and attentive initiatives, while also upholding its obligation to provide a thorough explanation of how ELA’s practices fulfill its mission. Furthermore, I would recommend restoring an early proposal to allow ELA to operate on a biennial budget cycle. This would allow some of the longer and more involved civic engagement efforts to more completely unfold, and perhaps demonstrate more perceptible results, within a single budget cycle. Performance evaluation is one of the most important interfaces between ELA and the City, with major implications for how the NC system is managed. Municipalities exploring the development of an NC system should consider these details in the formation process.

Third, I would explore the possibility of discontinuing the NC funding program in its current form. This is likely to be a highly controversial recommendation as there are mixed and passionate views about the role of City funding in the purpose of NCs. Some stakeholders feel that the NC controlled Neighborhood Purpose Grants provide an important service to the community, and address community needs not otherwise addressed by City services. In addition, NC funding can support NC administrative operations and allow NCs to strengthen their autonomous functioning. However, some NC stakeholders feel that by City funds are just an additional means by which the
City exerts control on communities. “We’re handing out this money and the minute we take it we’re no longer independent” (NC founder - 06ss). Also, it is worth considering that many of the more onerous City documentation requirements are the result of the NC funding program. If the funding program were discontinued, NCs would have more freedom in how they conduct their business, would spend significantly less time submitting paperwork to ELA, and would be subject to less scrutiny by the City Attorney’s office.

Surprisingly, the strongest advocates for the elimination of the NC funding program were NC participants. However, there is no consensus on whether the NC funding program should be eliminated, and these conversations have not become serious among NC participants or at ELA. Nonetheless, a collaborative among ELA, City, and NC stakeholders exploring how the NC funding program could be reformed could offer promising improvements to NC operations and the NC experience.

Finally, given the omnipresence of misunderstanding and mistrust, I strongly recommend clarifying role definitions, especially for ELA. Role definition establishes expectations and contextualizes relationships. When relationships lack this clarity, they are at best unproductive and at worst adversarial. It makes no sense for either of these conditions to be formalized within the governance structure. At this stage, it may be difficult for ELA not only to forge a singular coherent role but also to communicate it effectively to NC and City stakeholders. Although a public strategic planning process would be unprecedented for a Los Angeles City department, the interest and transparency in developing clear organizational structures and operating procedures may serve the dual goals of communicating information and improving trust among NCs. At the very
least, such a process could help NCs understand when and why ELA occupies one role, such as “enforcer,” in some contexts and another, such as “advocate,” in other contexts.

The effort to clearly define roles in a Neighborhood Council system is best made when designing the system. Although roles clarify through action and evolve over time, if the framework is convoluted or even ambiguous at the start, then misunderstandings inevitably arise and confusion and conflict set in. Jurisdictions seeking to develop NC systems should define roles as clearly as possible in the development process. This will not only improve clarity in governing documents, but can serve to guide the development process, which will be built on a foundation of role clarity.

Future Research.

This study invites further research in a number of areas both within the Los Angeles Neighborhood Council system and more broadly. This case provides a foundation for studying the integration of electoral representative and grassroots governance paradigms. Furthermore, it explores the implementation process, and accompanying municipal structures, for an emerging phenomenon in participatory democracy: neighborhood councils. Further research can extend these findings in a number of areas, including examinations of power in governance, metric testing, and by seeking broader analytic generalizability in comparative case studies.

Power in governance has long been the subject of intense study. Grassroots power, particularly as a foil to establishment power, is a subject of increasing interest, particularly in conversations about democratic reform and strong democracy. The findings of this study suggest that a principally grassroots oriented system is fraught with additional challenges, as is the integration of electoral and grassroots paradigms. Furthermore, it is clear that the emerging
conceptualizations of grassroots power are diverse and multifaceted. Moreover, grassroots power is especially topical in the current climate of U.S. politics, where there have been explosive examples of grassroots campaigns overcoming establishment powers. Thus, further examination of the nature of grassroots power could reveal how this paradigm could be most productively integrated into existing governance paradigms, thereby strengthening its viability in democratic reform.

The findings of this study also invite the further examination of the measurement tools used to evaluate the abstract concepts associated with strong democracy. Currently, concepts such as civic engagement, participation, and responsiveness must be evaluated by means of proxy metrics, many of which struggle to capture the true nature of these concepts or the true value of the work being done. This strongly affects the ability of ELA to demonstrate the contributions of the NCs or the value of ELA’s own work. Furthermore, it diminishes the ability of researchers to understand the place of ELA within these conceptual frameworks. Further research on how concepts such as civic engagement, participation, and responsiveness are instantiated in the Neighborhood Council system would contribute to better understanding of the role of NCs in realizing their goals. In addition, a better means of evaluating these concepts would offer an improved ability to evaluate the NC system, revealing more nuanced disparities across the NC system. Developing a means of more accurately measuring these concepts would represent an important contribution.

Finally, these findings provide a starting point for broader studies of both the Los Angeles Neighborhood Council system and other NC systems across the United States. A generalized study of the NC system, structured to examine NC actions and City decision-making, could offer insight
into the policy impact of the NC system. Furthermore, a broad study surveying NC participant motivations and perceived impacts could further illuminate the value of the NC system from the perspective of participants. Executing a census or even a representative survey questionnaire across the NC system has been a difficult undertaking in the past. However, given the heterogeneity among NCs in terms of demographics, interests, needs, and capacities, a broad study of the NC system would offer useful insight into NC capacities, perspectives, activity orientations, and the disparities among them. In addition, as jurisdictions across the country increasingly look to participatory democratic reforms, NC systems are becoming increasingly popular. Other cities have developed NC systems that are unique to their own existing municipal governance structures and reform goals. A multiple case study across several cities could reveal insights into both the conceptual and implementation dimensions of NCs. Specifically, an examination of how different jurisdictions confront and manage governance boundaries could provide insight into how other cities balance power between municipal and local grassroots entities. Such an examination could also reveal implementation challenges and best practices that were not present in the Los Angeles case. Collectively, these studies offer insight into the impact, value, and operational dynamics of neighborhood council governance paradigms.

Implications.

The findings of this study offer several important implications. First, this study provides theoretical contributions to neighborhood council and grassroots democratic reform movements. Existing literature evaluates the success of neighborhood councils achieving increased participation and improved government responsiveness, as well as the theoretical potential for neighborhood councils to deliver effective and efficient governance and their ability to address the shortcomings
of traditional electoral democratic institutions. However, the findings of this study indicate that NCs are not a panacea for the woes of traditional electoral frameworks. While there are benefits to an NC system, integrating models of governance requires a thorough understanding of how the empirical and theoretical dimensions of NCs come together. This study uses a boundary structure framework to connect the empirical outcomes of neighborhood councils and their theoretical foundations.

This study also makes theoretical contributions to boundary theory. Boundary theory research to date has largely focused on boundary practices as social processes in themselves, how organizational management techniques can help improve measurable outcomes, and social research methodological questions. Collaborative management literature addresses boundary theory in studies of inter-governmental networks. This study extends research on boundary organizations to those working across a multiplicity of boundaries simultaneously. This study further contributes an examination of the concept of boundary structure in the context integrating governance paradigms both theoretically and empirically, including the boundary spanning theory and implementation itself.

This study provides instrumental contributions to improve ELA, and assists the City of Los Angeles and other cities interested in developing and refining neighborhood council systems. For ELA, this study offers insight into how the department functions as a boundary structure and how its practices and role interact within the larger context of the NC system. These insights are essential to bringing organizational logic and practice into alignment, and to resolving instances of conflict between mission and work. Furthermore, these findings may contribute to organizational strategic planning, management, as well as future practices and initiatives. In addition, this study
may assist ELA communicating the nature and importance of its role to those among City leadership, NC stakeholders, and the public who hold the organization accountable.

For the City of Los Angeles, this study contributes additional insight into how its Neighborhood Council system works. To date, little consensus exists among stakeholders about how well the Neighborhood Council system is working, how it should work, whether it has been properly designed to meet the expectations that have been placed on it, or what its value is. Furthermore, this study offers the City insight regarding ELA’s role in the system. Understanding these roles, particularly how ELA mediates between governance paradigms and between normative and empirical goals, are important contributions.

Finally, this study offers practical contributions to other cities. For cities seeking to increase popular participation and to create “strong” democratic structures, this study offers insight into the intricacies of how theory and application meet. In addition, this study focuses closely on the role of ELA, the City department tasked with operating the NC, whose analog would no doubt be the centerpiece of any new NC system. The findings of this study that illuminate ELA’s role, and the importance of role definition within NC systems, are substantial contributions.

Concluding Thoughts.

As cities confront the governance challenges that accompany increasing size and diversity they must combat alienation, cynicism, and civic disinterest by providing meaningful opportunities for civic participation. Democratic participation offers substantive, instrumental, and normative benefits to governing institutions and the governed themselves. Neighborhood councils have potential to strengthen democratic structures by creating participatory institutions and fostering engaged civic attitudes, the pillars of a strong democracy. Since its inception 17 years ago, the Los
Angeles Neighborhood Council system has encountered challenges of reconciling the theoretical and practical inconsistencies between grassroots and traditional electoral paradigms of democratic governance. This study illuminates this paradigmatic divide and helps to explain how incommensurate viewpoints are bridged among groups. Understanding boundary practices and how boundary organizations use them is critical to developing neighborhood council systems that provide opportunities for meaningful participation. This study explores the theoretical and applied dimensions of how ELA bridges grassroots and traditional electoral democratic paradigms in the City of Los Angeles, and the implications of ELA’s boundary practices for democratic reform. If the patterns of metropolitanization continue and the accompanying civic maladies become more acute, increasing numbers of cities will pursue neighborhood based civic interventions. This study provides insight into the fundamental challenges these cities are likely to encounter, and offers a discussion of both the practical and philosophical dimensions of the radical undertaking of bridging democracies.
References


Elms, B., & Wogan, J. B. (2016). Peak performance: How Denver's Peak Academy is saving money, boosting morale, and just maybe changing the world


Evers, J., & D'Silva, J. (2009). Knowledge transfer from citizens’ panels to regulatory bodies in the domain of nano-enabled medical applications. *Innovation—the European journal of social science research, 22*(1), 125-142.


**Primary Sources**


Los Angeles Administrative Code, § 1, Div. 22, Ch. 28. The Department of Neighborhood Empowerment. Ordinance No: 172728. 30 August, 1999.

Los Angeles Administrative Code, § 1, Div. 5, Ch. 117. The Department of Neighborhood Empowerment Fund. Ordinance No: 173184. 14 April, 2000.


Los Angeles City Charter Art. IX, § 900.


Appendix A – Interview Guide

The following topics are areas of general inquiry to understand how DONE facilitates the strategic-integration between the city bureaucracy and the NCs. Furthermore, these questions will explore the various processes whereby DONE makes sense of and ascribes meaning to its role as a boundary structure between neighborhood councils and the city of Los Angeles. In conjunction with ethnographic observation, this guide is intended for use with DONE employees in order to solicit the perspectives and interpretations of the individuals who comprise the organization. Additionally, this guide may be expanded and adapted for respondents from NCs, the city bureaucracy and other NC-related leadership positions. The following guide is for use with line-staff (in finance and administration) as well as managers, all of whom are city employees who may have experience working in other city departments.

The following questions are designed to solicit data in response to the research questions below, and the interview guide intersperses inquiries regarding descriptions and interpretations in order to support more natural interaction between interviewer and respondent.

**Research Questions:**

- **How does DONE engage in boundary practices between the neighborhood councils and the city bureaucracy?**
- **What boundary practices does DONE use and how have they evolved over time?**
- **Finally, how do DONE’s boundary practices shape, and how are they shaped by, opportunities to enhance strong democracy?**

<table>
<thead>
<tr>
<th>Question</th>
<th>Rationale</th>
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<tr>
<td>1. General Neighborhood Councils</td>
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<tr>
<td>a. What are the neighborhood councils?</td>
<td>Provides a description of the NCs on a conceptual level, providing some context for a description of ELA</td>
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<td>b. What do neighborhood councils do?</td>
<td>Provides information regarding the sort of</td>
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2. Role of neighborhood councils
   a. What role do the neighborhood councils serve?
      Provides respondent conceptualization of the role that NCs play (in governance, politics, community, etc.)
   b. Does this vary?
      To get at variation among NCs

3. Role of Respondent (R)
   a. What is your position here?
      Provides context, location of respondent, relationship to ELA, NCs
   b. What do you do? (tell me about your day. What do you do when you get to work? What are the first things you do when you get in to the office in the morning?)
      Provides routine practices, activities of respondent, illustrates how they engage with their role/what their position means
   c. What is your role here?
      Provides respondent’s perspective/self-description of their role at ELA
   d. How did you come to work here?
      Provides motivations for doing their work
      i. Is it what you expected?
         How has the reality of the work delivered on motivations/expectations
      ii. Is it different from other city jobs?
         Is there something qualitatively different about working at ELA, between NC and City, than other city jobs?
   e. How does this role compare to other similar positions at different organizations?
      Is it an issue of this job being at the city? Or are there other positions that have similar roles? Is this something unique?

4. Role of ELA
   a. What is the Department of Neighborhood Empowerment?
      Provides a description of ELA on a conceptual level
   b. What does it do?
      Provides information regarding the sort of tasks, routine practices, activities etc. that ELA conducts. Illustrates the day to day functions of ELA.
   c. What are ELA’s mission and values? Can you give an example of how this shows up in your day to day work?
      Connects organization mission/values to the routine practice and daily work.
   d. What is ELA’s role in the neighborhood council system?
      Provides respondent conceptualization of the role that ELA plays within the NC system and connects it to a larger role (in governance, politics, community, etc.)
   e. Have you worked in other city departments?
      City workers are frequently transferred among departments, this question is to find out if the respondent has worked in other city
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<td>5. ELA strategy-integration</td>
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<tr>
<td>a. You mentioned, (X) type of role that ELA serves, can you give me an example of an initiative that reflects that?</td>
<td>Invites respondent to describe a strategic-initiative that reflects their conceptualization of ELA’s role.</td>
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<tr>
<td>i. Can you tell me about initiative (A,B,C,D)</td>
<td>Inquires about the specific/identified initiatives. This will be directed towards respondents that have been targeted due to their involvement in specific initiatives (which reflect middle management functions)</td>
</tr>
<tr>
<td>b. What was involved in working on (X)? Can you describe the work? Your typical day?</td>
<td>Provides an accounting for practices/routine activities involved in working on strategic integration</td>
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<tr>
<td>d. What sort of considerations did you have to make, balance when working on this? How did you decide?</td>
<td>Provides insight into the mindset of the respondent when engaging in work or making decisions. What factors did s/he weigh? Why?</td>
</tr>
<tr>
<td>e. How do you feel about the result? Is this the sort of work you thought you would be doing? How does the result/process reflect or not reflect the roles you previously described?</td>
<td>Provides insight into rationalization of activities. Does the work reflect the role, does the role as executed reflect the role as conceptualized?</td>
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<tr>
<td>f. Is this the work ELA should be doing?</td>
<td>Connects the instrumental and idealistic roles of ELA.</td>
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<td>6. NC and City</td>
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<tr>
<td>a. To your understanding, how does the NC system fit into the city governance scheme?</td>
<td>Provides a conceptual/pragmatic description of how the NC system is supposed to function within city governance</td>
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<tr>
<td>b. Where are the points of intersection?</td>
<td>Respondent observations of where and how NC and City structures interact (venues, types of interaction, ELA involvement)</td>
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<tr>
<td>i. Are these by design?</td>
<td>Provides insight regarding design versus on the ground aspects of implementation</td>
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<tr>
<td>c. How as the process of coordinating with city gone?</td>
<td>Do these interactions incur positive or negative results? Was the system designed/operated properly?</td>
</tr>
<tr>
<td>i. Can you give any examples of moments of interaction?</td>
<td>Provides specific examples of intersections between city and NC ways of knowing</td>
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<tr>
<td><strong>1. Moments of conflict</strong></td>
<td>Examples of epistemic breaches</td>
</tr>
<tr>
<td>a. How was it resolved?</td>
<td>Examples of boundary processes/meaning-making</td>
</tr>
<tr>
<td><strong>2. Moments of smooth sailing?</strong></td>
<td>Examples of convergent interests/shared meanings among ways of knowing</td>
</tr>
<tr>
<td>a. How did it work so well?</td>
<td>What processes, resources, approaches allowed interests/ways of knowing to align?</td>
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<tr>
<td><strong>7. How has ELA changed since you have been here?</strong></td>
<td>Provides insight regarding how the boundary organization has redefined its function and role (in response to challenges of design/implementation, external forces, evolution, etc.)</td>
</tr>
<tr>
<td>a. Processes?</td>
<td>Examples of processes, routine practices, and other functional activities of ELA</td>
</tr>
<tr>
<td>b. Personnel?</td>
<td>Examples of leadership, capacity development, organizational stability</td>
</tr>
<tr>
<td>c. Approaches?</td>
<td>Examples of mission, priorities</td>
</tr>
<tr>
<td><strong>8. How do you feel about the current structure ELA? (gratifications and burdens of work)</strong></td>
<td>Provide respondent perspectives/interpretations of what the roles and function mean to them personally</td>
</tr>
<tr>
<td>a. Are there any changes you might think of making?</td>
<td>Example of issues that are important to respondent in their current role at ELA</td>
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<tr>
<td>b. How would that change things here at ELA?</td>
<td>Provides understanding of how and why changes are important and/or needed</td>
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<tr>
<td>c. How would that change things in the relationship between NCs and city?</td>
<td>Describes how changes at ELA affect the relationship between NCs and city</td>
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ORDINANCE NO. 172728

An ordinance amending Division 22 of the Los Angeles Administrative Code, creating a Department of Neighborhood Empowerment

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Sec. 1. Division 22 of the Los Angeles Administrative Code is hereby amended by adding a new Chapter 28 to read:

CHAPTER 28
THE DEPARTMENT OF NEIGHBORHOOD EMPOWERMENT

ARTICLE 1
DUTIES OF THE DEPARTMENT

Sec. 22.800. Purposes.

There shall be a department in the City government known as the Department of Neighborhood Empowerment, which shall be referred to in this chapter as the “Department”. This Department shall be charged with the goal of promoting increased public participation in government and working to make government more responsive to local needs. The Department shall ensure that every part of the City is within the boundaries of a neighborhood council. The Department shall provide equal opportunity for all by enabling neighborhood groups to form neighborhood councils. The Department shall facilitate the delivery of City services to the neighborhoods by helping to identify and coordinate the needs of the communities with the responsibilities of the City departments by coordinating and involving the relevant City staff in integrated problem-solving with the neighborhood councils.

Sec. 22.801. Duties of the Department.

The Department shall:
(a) implement and oversee compliance with City ordinances and regulations relating to a system of neighborhood councils;
(b) prepare a Neighborhood Council Plan (Plan) for the creation of a system of neighborhood councils to ensure that every part of the City is within the boundary of a neighborhood council and that each neighborhood has an opportunity to form a neighborhood council, in accordance with Section 22.809;
(c) determine methods for certification of neighborhood councils;
(d) assist neighborhoods in preparing petitions for recognition or certification, identifying boundaries that minimize the division of communities and organizing themselves in accordance with the Plan;

(e) help neighborhood councils to meet together on a citywide basis and facilitate these meetings if and when requested to do so by recognized neighborhood councils;

(f) assist neighborhood councils with the election or selection of their officers;

(g) assist neighborhood councils to share resources, including offices, equipment and other forms of support and to communicate with constituents, other neighborhood councils and with government officials;

(h) arrange training for department staff and neighborhood councils officers and staff, such as training in leadership, cultural awareness, dispute mediation, civics, communications, equipment utilization and any other training necessary to achieve the goals set forth in Section 22.809;

(i) arrange community empowerment education for top level City officials, including elected officials and commissioners;

(j) with the assistance of the Information Technology Agency, create and maintain an internal and external information and communication network, including a Citywide database of neighborhood organizations and similar information, that would be available for public use;

(k) help coordinate the relationships between existing and newly created advisory committees and neighborhood councils;

(l) perform other duties as provided by ordinance;

(m) ensure that notification required in Section 22.809(f) is provided to the neighborhood councils along with sufficient committee or staff reports on the matters of interest to facilitate meaningful participation; and

(n) facilitate citywide meetings to be held, on at least a semi-annual basis, of representatives of all neighborhood councils.

ARTICLE 2
CONTROL AND MANAGEMENT

Section
22.802 General Manager.
22.803 Appointment and Removal of the General Manager.
22.804 Powers and Duties of the General Manager.
22.805 Board of Neighborhood Commissioners.
22.806 Powers and Duties of the Board.
22.807 Conflict of Interest.
22.808 Organization and Meetings of the Board.
22.809 Development of the Neighborhood Council Plan.
22.810 Implementation of the Plan.
22.811 Certification of Neighborhood Councils.
22.812 Annual City Budget Priorities.
22.813 Monitoring of City Services.
Sec. 22.802. General Manager.

The Department shall be under the control of a General Manager.

Sec. 22.803. Appointment and Removal of the General Manager.

The General Manager shall be appointed by the Mayor, subject to confirmation by the Council, and may be removed by the Mayor, as provided in Charter Section 508.

Sec. 22.804. Powers and Duties of the General Manager.

The powers and duties of the General Manager shall be those specified in Charter Section 510.

Sec. 22.805. Board of Neighborhood Commissioners.

(a) The Board of Neighborhood Commissioners shall consist of seven board members and be referred to in this chapter as the “Board” or the “Commission”.

(b) The Board shall be comprised of seven members, all of whom shall represent the City in its entirety. The members shall reflect the diverse geographic areas of the City and the diversity of communities of interest, neighborhoods, ethnicity, race, gender, age and sexual orientation.

(c) The Board members shall be appointed by the Mayor and confirmed by the Council and may be removed by the Mayor and vacancies filled in accordance with the provisions of the City Charter.

Sec. 22.806. Powers and Duties of the Board.

The Board shall be responsible for setting and overseeing policy, approving contracts and leases and promulgating rules and regulations. It shall not be responsible for the day-to-day management of the Department.

Sec. 22.807. Conflict of Interest.

Members of the Board and Board nominees shall be subject to all ethics and conflict of interest laws and regulations applicable to governing boards and commissions in the City of Los Angeles.

Sec. 22.808. Organization and Meetings of the Board.

(a) The Board shall adopt rules of order and appoint from among its members a president and vice-president who each shall hold office for one year or until their successors are elected, unless their respective membership on the Board ceases sooner. The Board shall hold regular public meetings at least twice each month and may hold meetings more often if necessary to conduct business. All meetings shall be noticed and
Members of the Board shall be paid $50 per meeting for each meeting of the Board attended, not to exceed $250 in any one calendar month.

(b) At least four members shall constitute a quorum, but a smaller number may adjourn from time to time until a quorum is present. The Board may establish a committee or committees composed of three of its members to consider matters for, to conduct hearings on behalf of, and make recommendations to the board on matters relating to neighborhood empowerment.

(c) The powers conferred on the Board shall be exercised by order or resolution adopted by a majority of its members and recorded in the Board’s minutes.

Sec. 22.809. Development of the Neighborhood Council Plan.

The Department of Neighborhood Empowerment shall seek public input in its development of a Plan for a Citywide system of neighborhood councils. The Plan shall contain a statement of goals, policies and objectives of the Neighborhood Council system, and shall contain specific regulations, in draft ordinance format. These regulations, when adopted by ordinance, shall be sufficient to implement the Plan and shall conform with the following:

(a) The regulations shall establish the method by which boundaries of neighborhood councils will be determined based on standards adopted by the Commission and approved by City Council. The system for determining boundaries shall maintain neighborhood boundaries to the maximum extent feasible and may consider community planning district boundaries where appropriate.

(b) The regulations must ensure that all areas of the City are given an equal opportunity to form neighborhood councils.

(c) The regulations shall establish the procedure and criteria for recognition or certification of neighborhood councils.

(d) The regulations shall not restrict the method by which the members of a neighborhood council are chosen, if the process otherwise satisfies the requirements of this article.

(e) The regulations shall require that neighborhood councils adopt fair and open procedures for the conduct of their business. However, neighborhood council meetings are not all required to be held within the boundaries of the area represented by the neighborhood council.

(f) Early Notification Procedures. The regulations shall establish procedures for receiving input from neighborhood councils prior to decisions by the City Council, City Council committees and boards and commissions. The procedures shall include, but need not be limited to, notice to neighborhood councils as soon as practical and a reasonable opportunity to provide input before decisions are made. That notice shall be required for matters that will be considered by the City Council, City Council committees, City boards or commissions and any other City official who is required to hold a noticed public hearing. However, failure of a neighborhood council to receive notice shall not invalidate any action of the City Council, City Council Committees, City boards or commissions or any other City official.
Sec. 22.810. Implementation of the Plan.

The Department of Neighborhood Empowerment shall complete development of the Plan and present it and all necessary regulations for a system of neighborhood councils to the Council and Mayor within one year of the establishment of the department and commission. The Council shall consider the regulations and, within six months after presentation of the Plan to Council, may adopt ordinances to implement the regulations as proposed or as modified by the Council consistent with the requirements of the plan set forth above in Section 22.809. If implementing ordinances are not adopted within the time period set forth in Charter Section 905, then the regulations adopted by the Board shall become effective, and to the extent not inconsistent with law shall be binding upon all City departments and offices.

Sec. 22.811. Certification of Neighborhood Councils.

(a) By Laws. Each neighborhood council seeking official certification from the City shall submit an organization plan and by-laws to the Department of Neighborhood Empowerment showing, at a minimum:

(1) the method by which their officers are chosen;

(2) that neighborhood council membership will be open to everyone who lives, works, owns property or otherwise identifies themselves as a stakeholder in the area, based on their participation in among other things, educational institutions, religious institutions, community organizations or other non-profit organizations;

(3) assurances that the members of the neighborhood council will reflect the diverse interests within their area;

(4) a system through which the neighborhood council will communicate with stakeholders on a regular basis;

(5) a system for financial accountability of its funds; and

(6) guarantees that all meetings will be open and public, and permit, to the extent feasible, stakeholders to participate in the conduct of business, deliberation and decision-making.

(b) Petitioning for Certification and Approval. Neighborhood councils may petition for certification in accordance with rules and procedures set forth in the Plan.

Sec. 22.812. Annual City Budget Priorities.

Each neighborhood council may present to the Mayor and Council an annual list of priorities for the City budget. The Mayor shall inform certified neighborhood councils of the deadline for submission so that the input may be considered in a timely fashion.

Sec. 22.813. Monitoring of City Services.

Neighborhood councils shall monitor the delivery of City services in their respective areas and have periodic meetings with responsible officials of City departments, subject to their reasonable availability.
Sec. 22.812. Annual City Budget Priorities.

Each neighborhood council may present to the Mayor and Council an annual list of priorities for the City budget. The Mayor shall inform certified neighborhood councils of the deadline for submission so that the input may be considered in a timely fashion.

Sec. 22.813. Monitoring of City Services.

Neighborhood councils shall monitor the delivery of City services in their respective areas and have periodic meetings with responsible officials of City departments, subject to their reasonable availability.
An ordinance adding to the Los Angeles Administrative Code a new special fund for funds appropriated to the Department of Neighborhood Empowerment pursuant to Charter Section 911.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1 Chapter 117 is hereby added to Division 5 of the Los Angeles Administrative Code to be captioned and to read as follows:

CHAPTER 117
DEPARTMENT OF NEIGHBORHOOD EMPOWERMENT FUND

Sec. 5.517. Creation and Administration of the Fund

(a) There is hereby created and established within the Treasury of the City of Los Angeles a special fund to be known as the Department of Neighborhood Empowerment Fund (the "Fund") for the deposit and disbursement of funds appropriated to the Department of Neighborhood Empowerment (the "Department") for the operations of the Department and for the startup and functioning of neighborhood councils.

(b) The Fund shall be administered by the General Manager of the Department. All interest earnings accruing on money in the Fund shall be credited to the General Fund of the City. Money in the Fund shall not revert to the Reserve Fund of the City.

I hereby certify that the foregoing ordinance was adopted by the Council of the City of Los Angeles, at its meeting on April 11, 2000.

J. MICHAEL CAREY, City Clerk
By KONRAD CARTER, Deputy

Approved: April 14, 2000

RICHARD J. RIORDAN, Mayor
Approved as to Form and Legality
JAMES K. HAHN, City Attorney
C. F. 99-1800-S42
ORDINANCE NO. 175937

An ordinance amending Sections 22.535 and 22.801 of the Los Angeles Administrative Code transferring the administrative responsibility for leasing and rental of office and meeting space on behalf of the City's certified Neighborhood Councils from the Department of General Services to the Department of Neighborhood Empowerment.

WHEREAS, voter approval of a City Charter operative July 1, 2000, established, among other things, a citywide system of neighborhood councils and created a Department of Neighborhood Empowerment;

WHEREAS, the certified neighborhood councils desire and request office and meeting space to assist them in their function as official advisory bodies of the City of Los Angeles;

WHEREAS, City Charter Section 901 sets forth the duties and responsibilities of the Department of Neighborhood Empowerment which, among other things, states that the Department shall "assist neighborhood councils to share resources, including offices, equipment and other forms of support for them to communicate with constituents, other neighborhood councils and with government officials....";

WHEREAS, the administrative responsibility to provide leasing services, including managing the leasing of space needed for City departments, currently rests with the Department of General Services pursuant to Los Angeles Administrative Code Section 22.535; and

WHEREAS, on December 2, 2003, the City Council adopted a report recommending that the administrative responsibility for assisting the neighborhood councils with office space and meeting space requirements, including leasing processes, shall be transferred in every aspect from the Department of General Services to the Department of Neighborhood Empowerment,

NOW THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. Section 22.535 of Article 8 of Chapter 21 of Division 22 of the Los Angeles Administrative Code is amended to add a new Subsection (c) to read:

(c) Notwithstanding the Department's responsibility to provide building services and manage leasing for City departments pursuant to Subsections (a) and (b) above, the
Department is exempt from having the primary administrative responsibility for assisting the City’s certified neighborhood councils to secure rented or leased premises when a standard short-term rental and lease agreement with a duration of one year or less is used. This responsibility is transferred to the Department of Neighborhood Empowerment to secure office or meeting space on behalf of the certified neighborhood councils by utilizing space sharing in other City facilities, coordinating the acceptance and use of donated space from private donors, as well as securing suitable office and meeting space on behalf of certified neighborhood councils as set forth in Section 22.801 (o) of this Code.

Sec 2. Section 22.801 of Article 3 of Chapter 28 of Division 22 of the Los Angeles Administrative Code is amended to add a new Subsection (o) to read:

(o) ensure that neighborhood councils have adequate office and meeting space to conduct their business by facilitating the shared utilization of City owned or leased space, coordinating the acceptance and use of donated space by private donors, as well as securing suitable office and meeting space on behalf of certified neighborhood councils. The Department shall have the authority to execute standard short-term rental and lease agreements with a duration of one year or less for the purpose of fulfilling its obligations under this subsection, pursuant to Department of Neighborhood Empowerment guidelines.
Sec. 3. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located in the Main Street lobby to the City Hall; one copy on the bulletin board located at the ground level at the Los Angeles Street entrance to the Los Angeles Police Department; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of APR 14, 2004.

J. MICHAEL CAREY, City Clerk

Approved 4/20/04

Approved as to Form and Legality

ROCKARD J. DELGADILLO, City Attorney

By PETER NELSON KING
Deputy City Attorney

Date MAR 16, 2004

File No. C.F. NO. 03-1514
An ordinance amending the Los Angeles Administrative Code to add a section exempting neighborhood councils from Government Code Section 87300 which requires adoption and promulgation of a conflict of interest code, and to add a section establishing the procedures and standards for determining the applicability of an exemption to other entities.

WHEREAS, the Charter of the City of Los Angeles (City) created and provided funding for the development of a system of neighborhood councils to promote more citizen participation in government and to make government more responsive to local needs; and

WHEREAS, the City's stakeholders responded by forming numerous neighborhood councils citywide; and

WHEREAS, the Fair Political Practices Act requires the adoption and promulgation of a conflict of interest code by any entity that is characterized by one or more of the following factors: (1) creation by government action, (2) receipt of substantial funding from government, (3) performance of services traditionally performed by a governmental entity; and (4) treatment as a public entity by other statutory provisions; and

WHEREAS, the Fair Political Practices Commission (“FPPC”) has established criteria to exempt entities for which it is the code reviewing body from the requirement of adopting and promulgating the conflict of interest code required by Government Code Section 87300 and has encouraged local code reviewing bodies to enact similar exemption criteria; and

WHEREAS, the criteria established by the FPPC allows an exemption for entities that: (1) have no regulatory, quasi-regulatory, permit, licensing or planning authority or functions; (2) will not acquire real property in the foreseeable future; and (3) have an annual operating budget exclusive of salaries that is less than $70,000; and

WHEREAS, the FPPC may also grant an exemption, on a case-by-case basis where good cause exists, to entities that do not meet the delineated criteria; and

WHEREAS, the FPPC issued an informal assistance letter advising that the City Council may enact and determine the applicability of similar exemption criteria for any entity for which the City Council is the code reviewing body; and

WHEREAS, the City Council is the code reviewing body for all City entities that are required to adopt and promulgate a conflict of interest code; and
WHEREAS, requiring neighborhood councils to adopt and promulgate a conflict of interest code and comply with mandated filings would have a chilling effect on some stakeholder participation and would, because of the sheer number of active participants in neighborhood councils, strain City resources; and

WHEREAS, neighborhood councils: (1) have no regulatory, quasi-regulatory, permit, licensing or planning authority or functions; (2) will not acquire real property in the foreseeable future; (3) have an annual operating budget exclusive of salaries that is less than $70,000; and good cause exists to grant an exemption for neighborhood councils from the requirement of adopting and promulgating a Conflict of Interest Code.

WHEREAS, if neighborhood councils are exempted from adopting and promulgating a conflict of interest code, they nevertheless will be bound by the substantive provisions of the Political Reform Act requiring disclosure and recusal in specified situations involving conflict of interests; and

WHEREAS, if neighborhood councils are exempted from adopting and promulgating a conflict of interest code, the board of each neighborhood council by amending the neighborhood council’s by-laws can require board members to provide any level of disclosure the board deems appropriate.

NOW, THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. A new Section 2.20.1 is added to Division 2, Chapter 1, Article 3 of the Los Angeles Administrative Code to read:

Section 2.20.1 Exemption for Neighborhood Councils from Government Code Section 87300, Requiring the Adoption and Promulgation of a Conflict of Interest Code. Neighborhood Councils hereby are exempted pursuant to Los Angeles Administrative Code section 2.20.2, subsections (d) and (e) from the application of Government Code Section 87300, requiring the adoption and promulgation of the conflict of interest code.

Sec. 2. A new Section 2.20.2 is added to Division 2, Chapter 1, Article 3 of the Los Angeles Administrative Code to read:

Sec. 2.20.2. Procedures and Standards for Requesting Exemption from Government Code Section 87300, Requiring the Adoption and Promulgation of a Conflict of Interest Code.

(a) This Section sets forth the procedures and standards by which the City will review a request for an exemption to Government Code Section 87300.
from an entity for which the City Council is the code reviewing body. Nothing in this section shall be construed to mean that an entity is not required to adopt a conflict of interest code if it has not requested and been granted an exemption.

(b) An entity may submit a request to the City Ethics Commission for exemption from the provisions of Government Code Section 87300 requiring adoption and promulgation of a Conflict of Interest Code.

(c) A request for exemption shall be approved by the City Ethics Commission if it finds:

(i) That if the entity requesting the exemption were to adopt a Conflict of Interest Code, there would be no "designated employees," within the meaning of Government Code Section 82019 and 87302(a), subject to its provisions; or

(ii) That the entity is, or soon will be, inoperative and non-functioning.

(d) A request for exemption to Government Code Section 87300 may be approved by the City Ethics Commission when the entity requesting the exemption would have no "designated employees" within the meaning of Government Code Sections 82019 and 87302(a) because all of the following apply:

(i) The entity does not have regulatory, quasi-regulatory, permit, licensing or planning authority or functions;

(ii) The entity will not acquire real property in the foreseeable future; and

(iii) The annual operating budget exclusive of salaries for the agency is less than $70,000.

(e) In all other circumstances, the City Ethics Commission will consider the requests for exemptions on a case-by-case basis.

(f) A request for exemption under subsection (c)(1) shall be signed by the chief executive officer, president or a designated representative of the entity and shall be accompanied by:

(i) A list of every position in the entity, including each officer, employee, member and consultant with the entity;

(ii) A copy of the job description for each position listed in subsection (1) above;
(iii) A copy of the statutory authority under which the entity was created with specific citations to the provisions setting forth the duties and responsibilities of the entity;

(iv) Identification of the person or body to whom the entity reports;

(v) A copy of the annual or regular report submitted by the entity to the person or body to whom the entity reports;

(vi) A detailed justification of the request for exemption including an explanation of why none of the positions listed in subsection (1) above is a designated employee. In preparing this justification, particular note should be taken of Government Code Section 82019.

(g) A request for exemption under subsection (c)(2) shall be signed by the chief executive officer, president or a designated representative of the entity and shall be accompanied by:

(i) A copy of the statutory or legal authority under which the entity ceased, or soon will cease to operate or function;

(ii) The date, time and place of the last meeting of the entity;

(iii) Identification of the positions and names of any staff who continue to work for or represent the entity, whether salaried or unsalaried; and

(iv) A detailed explanation of the reasons the entity is, or soon will be, inoperative and nonfunctioning.

(h) Within 90 days after receiving the request for exemption, the Ethics Commission shall:

(i) Approve the request;

(ii) Deny the request;

(iii) Return the request for additional information and resubmission within 60 days. Upon resubmission, the Ethics Commission shall, within 60 days, either approve the request for exemption or deny the request.

(i) When a request for exemption is approved, the Ethics Commission shall issue an exemption letter and transmit it to the requesting entity. Within 60 days, any interested party may submit a request to the City Council that the approval be reconsidered by the City Council. The City Council shall consider the request for reconsideration and if good cause exists for reconsideration, the
City Council shall schedule the matter for a hearing before the City Council. The City Council’s determination to approve or disapprove a request for exemption after a hearing on the issue shall be final. If the City Council disapproves the exemption request, the City Council shall set a deadline within a 6 month period by which the entity requesting the extension shall adopt and promulgate a Conflict of Interest Code pursuant to Section 87300 of the Government Code.

(j) When a request for exemption is denied, the Ethics Commission shall issue a letter denying the request for an exemption and transmit it to the requesting entity. Within 60 days, the requesting entity or any interested party may submit a request to the City Council that the denial be reconsidered by the City Council. The City Council shall consider the request for reconsideration and if good cause exists for reconsideration, the City Council shall schedule the matter for a hearing before the City Council. The City Council’s determination to approve or disapprove a request for exemption after a hearing on the issue shall be final. If the City Council disapproves the exemption request, the City Council shall set a deadline within a 6 month period by which the entity requesting the extension shall adopt and promulgate a Conflict of Interest Code pursuant to Section 87300 of the Government Code.

(k) Any entity granted an exemption pursuant to subsection (d) or (e) shall notify the Ethics Commission within 30 days if one or more of the following occurs:

(I) The entity obtains authority to engage in regulatory, quasi-regulatory, permit, licensing or planning authority or functions;

(II) The entity acquires real property; and

(III) The annual operating budget exclusive of salaries for the agency is exceeds $70,000.

(l) If the Ethics Commission receives notice from an entity under subsection (k) or otherwise learns of facts or circumstances that indicate that an entity may no longer be eligible for an exemption from the provisions of Government Code Section 87300 requiring adoption and promulgation of a Conflict of Interest Code, the Ethics Commission may reconsider the exemption and may issue a letter notifying the entity that it is no longer eligible for an exemption from the provisions of Government Code Section 87300 requiring adoption and promulgation of a Conflict of Interest Code.

(m) Within 60 days of receiving a letter under subsection (l) from the Ethics Commission stating that an entity is no longer eligible for an exemption, the entity or any interested party may submit a request to the City Council that the exemption revocation be reconsidered by the City Council. The City Council shall consider the request for reconsideration and if good cause exists for
reconsideration, the City Council shall schedule the matter for a hearing before
the City Council. The City Council's determination to approve or disapprove an
exemption revocation after a hearing on the issue shall be final. If the City
Council approves the exemption revocation, the City Council shall set a deadline
within a 6 month period by which the entity requesting the extension shall adopt
and promulgate a Conflict of Interest Code pursuant to Section 87300 of the
Government Code.
Sec. 3. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located in the Main Street lobby to the City Hall; one copy on the bulletin board located at the ground level at the Los Angeles Street entrance to the Los Angeles Police Department; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that the foregoing ordinance was introduced at the meeting of the Council of the City of Los Angeles FEB 01 2005 and was passed at its meeting of FEB 08 2005.

FRANK T. MARTINEZ, City Clerk

Approved FEB 15 2005

Mayor

Approved as to Form and Legality

ROCKARD J. DELGADILLO, City Attorney

By VALERIE FLORES

Deputy City Attorney

Date: January 5, 2005

File No. 02-2794-S1
DECLARATION OF POSTING ORDINANCE

I, MARIA C. RICO, state as follows: I am, and was at all times hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and a Deputy City Clerk of the City of Los Angeles, California.

Ordinance No. 176477 - Amending the L.A.A.C. to add a section exempting neighborhood councils from Government Code Section 87300 which requires adoption and promulgation of a conflict of interest code - a copy of which is hereto attached, was finally adopted by the Los Angeles City Council on February 8, 2005, and under the direction of said City Council and the City Clerk, pursuant to Section 251 of the Charter of the City of Los Angeles and Ordinance No. 172959, on February 16, 2005. I posted a true copy of said ordinance at each of three public places located in the City of Los Angeles, California, as follows: 1) One copy on the bulletin board at the Main Street entrance to Los Angeles City Hall; 2) one copy on the bulletin board at the ground level Los Angeles Street entrance to the Los Angeles Police Department; and 3) one copy on the bulletin board at the Temple Street entrance to the Hall of Records of the County of Los Angeles.

Copies of said ordinance were posted conspicuously beginning on February 16, 2005 and will be continuously posted for ten or more days.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16th day of February 2005 at Los Angeles, California.

[Signature]

Maria C. Rico, Deputy City Clerk

Ordinance Effective Date: Mar. 28, 2005 Council File No. 02-2794-81
ORDINANCE NO. 176704

An ordinance amending Ordinance No.174006 and Ordinance No.174975 to codify the regulations for the Citywide System of Neighborhood Councils into the Los Angeles Administrative Code and to add a provision regarding Neighborhood Council Election Procedures.

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. A new Section 22.810.1 is added to Article 2, Chapter 28 of Division 22 of the Los Angeles Administrative Code to read:

Sec. 22.810.1. Regulations Implementing the Plan for a Citywide System of Neighborhood Councils (Plan).

(a) Department Responsibilities. In addition to the responsibilities set forth in Article IX of the City Charter and Section 22.801 of this Code, the Department of Neighborhood Empowerment (Department) shall:

(1) Assist all groups and stakeholders seeking certification so they will have an equal opportunity to form and develop Neighborhood Councils by:

(A) Providing assistance to areas of the City with traditionally low rates of participation in government;

(B) Helping communities understand the processes and procedures for establishing a Neighborhood Council;

(C) Assisting with completion of certification documentation; and

(D) Mitigating barriers to participation, such as the need for translation and child care services.

(2) Assist neighborhoods and Neighborhood Councils with public and civic education, outreach and training with an emphasis given to areas that have traditionally low rates of participation in government.

(3) Assist applicants and neighborhoods to prepare all petitions and forms referenced in the Plan, to identify suitable Neighborhood Council boundaries, and organize Neighborhood Councils in accordance with the Plan.
(4) Assist Neighborhood Councils with the election or selection of their governing body.

(5) Help coordinate meetings and facilitate communication among Neighborhood Councils that request assistance.

(6) Help coordinate, arrange, and convene the biannual Congress of Neighborhood Councils meetings.

(7) Promote and facilitate open communication among City agencies and Neighborhood Councils, and provide education, guidance and assistance in developing strategies for providing comments and feedback to the City Council and its committees and City boards and commissions.

(8) Provide operational support and facilitate the sharing of resources among Neighborhood Councils, including, but not limited to, meeting and office space, office equipment, and mail and communications in order to communicate among constituents, Neighborhood Councils, and government officials.

(9) Create and maintain a database of information about Neighborhood Councils, including, among other information, names and contact information that will be available for public use.

(10) Act as an information clearinghouse and resource to Neighborhood Councils.

(11) Coordinate efforts to establish and ensure continued operation of the Early Notification System as prescribed in the Plan.

(12) Arrange training for Neighborhood Councils' officers and staff.

(13) Review and evaluate the Neighborhood Council System on an annual basis. As part of its annual report, the Department shall provide information on the size, geographic scope, and economic and demographic conditions of areas in which Neighborhood Councils have and have not been certified.

(14) Report quarterly, commencing from the adoption date of the Plan, to the appropriate Council Committee on the Department's certification efforts, and on strategies and recommendations for certifying areas with traditionally low rates of civic participation in government to ensure participation by all the City's neighborhoods in the certification process.

(15) Provide adequate levels of staffing, with consideration to resource availability, for each Neighborhood Council.
(b) Certification of Neighborhood Councils.

(1) **Department Responsibilities.** The Department shall have the following responsibilities:

(A) Announce and inform the public of the Neighborhood Council certification process Citywide.

(B) Actively promote the formation of Neighborhood Councils Citywide, giving emphasis to those areas and community stakeholder groups with traditionally low rates of civic participation in government.

(C) Facilitate and encourage collaboration and discussion among neighboring and overlapping applicant groups.

(D) Provide technical assistance on how to proceed with a unified certification application.

(E) Provide dispute resolution services to applicants where more than one application is submitted for a Neighborhood Council boundary area to gain consensus on a unified certification application.

(2) **Qualification and Criteria for Neighborhood Council Certification.** Any group of persons in a community may seek certification as a Neighborhood Council by presenting an application to the Department that includes the following information:

(A) A boundary proposal that sets forth the rationale for the boundary choice, and shows how the boundaries comply with the following Boundary Goal Criteria:

   (i) The proposed area has a minimum of 20,000 residents. However, areas that have fewer than 20,000 residents may be considered for certification providing they meet the following criteria and otherwise meet all other requirements of the Plan:

   (1) The proposed area is separated from adjacent communities by significant geographic or other features; or

   (2) The proposed area is identified by name within any of the adopted community plans within the City of Los Angeles; or

   (3) The proposed area represents an historic, identifiable neighborhood or community and includes local
City service providers, such as a public library, park or recreation center, fire or police station or a public school.

(ii) The proposed area, to the maximum extent feasible, follows historic and contemporary community and neighborhood borders, utilizes natural boundaries or street lines and is geographically compact and contiguous.

(iii) Neighborhood Council boundaries may not overlap with other Neighborhood Council boundaries unless the area proposed for inclusion into each Neighborhood Council is designated for a public use, such as a park, school, library, police or fire station or major thoroughfare or contains a landmark or facility with historical significance.

The application proposal for overlapping boundaries with another Neighborhood Council must include a detailed rationale for incorporating the proposed area.

(B) A detailed description of the outreach process used to identify community stakeholders within the proposed Neighborhood Council boundary as well as the following:

(i) Proof of the collection of no less than 200 and no more than 500 signatures from community stakeholders within the proposed Neighborhood Council boundaries.

(ii) Signatures shall, to the maximum extent feasible, reflect the broadest array of community stakeholders who will be active participants in the Neighborhood Council.

(C) A copy of the Neighborhood Council’s approved by-laws, which shall include the following:

(i) The Neighborhood Council name.

(ii) A statement that the Neighborhood Council membership is open to all community stakeholders.

(iii) A list of the offices of its governing body and its method for regularly electing or selecting its officers who shall serve as the governing body subject to the following:

(1) The governing body must, to the extent possible, reflect the diversity of the Neighborhood Council’s community stakeholders. No single stakeholder group may
comprise a majority of the Neighborhood Council's governing body, unless approved by the Department upon a showing of extenuating circumstances.

(2) No person may serve more than eight consecutive years in any office of the governing body.

(3) The governing body shall include an officer named “Treasurer,” whose duties shall include, but not be limited to, maintaining the Neighborhood Council’s book of accounts and submitting account statements to the Department no less than once but not more than three times during the fiscal year, as prescribed by the Department.

(iv) A description of its meeting procedures, which shall include provisions that each Neighborhood Council shall do the following:

(1) Meet at least once per calendar quarter.

(2) Obey any or all applicable sections of the state’s Ralph M. Brown Act.

(3) Establish procedures for communicating with all Neighborhood Council community stakeholders on a regular basis in a manner that ensures that information is disseminated throughout and in a timely manner.

(4) Adopt procedures for running meetings, including provisions that identify: the number of governing body members that constitute a majority and a quorum; the number of votes by which a governing body may take an action on a matter before it; the manner in which an action by the governing body can be reconsidered, if at all.

(v) The method it will use to address grievances and resolve disputes by which an individual community stakeholder or group of community stakeholders of a Neighborhood Council may express concerns to their Neighborhood Council about its actions.

(D) A description of its system of financial accountability that meets the requirements set forth in Article III, Section 2 (d) of the Plan.

(E) An acknowledgment and agreement that the Neighborhood Council will abide by any applicable provisions of the City's Governmental Ethics Ordinance, as set forth in Los Angeles Municipal
Code Section 49.5.1 et. seq., and an acknowledgment and agreement that it will abide by all applicable laws of the federal, state and local government.

(F) The names of no fewer than three and no more than five individuals who shall act as official contacts between the applicants and the Department until the Neighborhood Council is certified.

(c) Certification Process.

(1) Certification. The Department will review and make an evaluation of the certification application to determine whether the application meets all of the criteria set out in Article III, Section 2 of the Plan.

(2) Department Responsibilities. Once a certification application is submitted to the Department, the Department shall evaluate the application to determine whether it is complete. After determining that an application is complete and that it describes a specific set of boundaries for a proposed Neighborhood Council, the Department shall forward the application, any accompanying information, and its recommendation to the Board of Neighborhood Commissioners (Commission) for consideration and notify the Neighborhood Council in writing that the application has been forwarded to the Commission for its consideration. The Department shall evaluate the certification application and make a recommendation to the Commission pursuant to the procedures set forth in Article IV of the Plan.

(A) If the Department receives two or more certification applications that identify the same, similar, or overlapping Neighborhood Council boundaries, the Department shall immediately notify in writing all contacts, as required to be identified in Paragraph (F) of Subdivision (2) of Subsection (b) of this section and Article III, Section 2 (f) of the Plan, for all affected applicant groups in an effort to work with applicants to produce a unified application. The procedures set forth in Article IV Section 2 (b) of the Plan should then be followed to the maximum extent feasible.

(B) If at any time during the process as described in Article IV of the Plan, the Department determines that an application is not complete, it shall return the application to the applicants along with a written description of the missing components required for the certification application. Applicants may thereafter at any time re-submit the application after amending it to meet all the necessary criteria.

(C) If the Department fails to evaluate or make a recommendation on the application as set forth in Article IV, Section 2
of the Plan, the Department shall forward the application to the Commission for its consideration without the Department's recommendation.

(3) Before the Commission acts on a proposed certification, the matter shall be set for a public hearing. The Department shall post public notices, as set forth in Article IV, Section 3 of the Plan, setting forth the time, place and purpose of the hearing, which shall be posted within the boundaries of the proposed Neighborhood Council for 15 days. The notices shall be translated in accordance with the provisions set forth in Article IV, Section 3 of the Plan.

Notice of the time, place and purpose of the hearing shall also be mailed to the applicant and to the contacts identified in the application as required in Paragraph (F) of Subdivision (2) of Subsection (b) of this section, within the time frames set forth in Article IV, Section 3 of the Plan. The Commission shall act on the certification within ten days after the expiration of the 15 day posting period, unless the Commission's regularly scheduled meeting does not fall within this ten day period or unless the Commission and the Neighborhood Council applicants agree to an extension of time.

The Commission meeting should be conducted within the boundaries of the proposed Neighborhood Council, if feasible. In a case where two or more certification applications have identified the same, similar, or overlapping Neighborhood Council boundaries, the Commission shall make a final determination on how the final boundaries of each Neighborhood Council shall be drawn, giving consideration to the criteria set forth in Article III, Section 2(a) of the Plan and any other applicable provisions of the Plan. The Commission shall either approve or disapprove the certification application based upon the criteria set forth above in Subdivision (2) of Subsection (b) of this section and the criteria set forth in the Plan.

(4) Appeals. If the Commission approves the application, the proposed Neighborhood Council shall be recognized and certified as a Neighborhood Council. If the Commission disapproves the application, the applicants may appeal to the City Council within the time as set forth in Article IV, Section 9 of the Plan. The City Council may, by ten votes, sustain, reverse or modify the Commission's decision to disapprove a certification application.

(d) Boundary Adjustment.

(1) Adjustment of Boundaries. A Neighborhood Council may file a petition with the Commission to adjust its boundaries. All petitions must meet the criteria set forth in this section and in Article III, Section 2 of the
Plan. Reasons for boundary adjustments may include, but are not limited to:

(A) Incorporating an uncertified adjacent community into the Neighborhood Council;

(B) Reconfiguring the size of the Neighborhood Council based on a decrease or increase in population; or

(C) Increasing or reducing the size of the Neighborhood Council to increase effectiveness and efficiency.

(2) Boundary Adjustment Other Than Incorporation.

(A) Department Responsibilities. The Department shall review a petition within 15 days of its receipt and make a recommendation to the Commission. Before the Commission acts on a proposed boundary adjustment, the matter shall be set for a public hearing. Fifteen days prior to the hearing, the Department shall post public notices within the boundaries of the Neighborhood Council, stating the time, place and purpose of the hearing, as set forth in Article VI, Section 2(d) of the Plan. The notices shall be translated in accordance with the provisions set forth in Article VI, Section 2(d)(ii) of the Plan.

Notice of the time, place and purpose of the hearing shall also be mailed to the applicant pursuant to the time frames set forth in Article VI, Section 2 (d) of the Plan. The Commission meeting should be conducted within the boundaries of the proposed Neighborhood Council, if feasible. The Commission shall act on the boundary adjustment within ten days after the expiration of the 15-day posting period, unless the Commission’s regularly scheduled meeting does not fall within this ten day period or unless the Commission and the Neighborhood Council applicants agree to an extension of time.

(B) Commission Action. The Commission shall consider the recommendation of the Department, review the petition and determine whether the petition meets the criteria of this ordinance and Article VI, Section 2 of the Plan at a public hearing, noticed as set forth in Paragraph (2)(A) above, and make its determination within ten days of receipt of the Department’s recommendation, unless the Commission’s regularly scheduled meeting does not fall within this ten day period or unless the Commission and the Neighborhood Council applicants agree to an extension of time.
(C) **Appeals.** If the Commission approves the petition, the Neighborhood Council boundary shall be determined to be changed in accordance with the petition. If the Commission disapproves the petition, the Neighborhood Council may appeal to the City Council within the time set forth in Article VI, Section 2 (b) of the Plan. The City Council may, by ten votes, sustain, reverse or modify the Commission’s decision to disapprove a boundary adjustment petition.

(3) **Incorporation Into Adjoining Neighborhood Councils.** The Commission shall have the authority to expand a Neighborhood Council's boundary in order to incorporate an area of the City that has not formed a Neighborhood Council into the boundary of another, adjoining Neighborhood Council provided that:

(A) The proposed area to be incorporated into a Neighborhood Council's boundary lies between two or more Neighborhood Councils;

(B) The proposed area to be incorporated does not qualify for certification under the provisions of this Plan; and

(C) Community stakeholders of the proposed area to be incorporated and of the affected Neighborhood Council agree to the proposed incorporation.

(4) **Incorporation Initiated by an Entity Other than the Commission.** An incorporation petition may be submitted by an entity other than the Commission, if community stakeholders of the area to be incorporated and of the affected certified Neighborhood Council have agreed to the proposed incorporation.

(A) **Department Responsibilities.** After determining that an incorporation petition initiated by community stakeholders or an entity other than the Commission is complete, the Department shall forward the petition, any accompanying information and its recommendation to the Commission for consideration. The Department shall notify the Neighborhood Council in writing that the petition has been forwarded to the Commission for its consideration. The Department shall evaluate the petition and make a recommendation to the Commission pursuant to the procedures set forth in Article VI of the Plan.

(i) If at any time during the process as described in Article VI of the Plan, the Department determines that a petition is not complete, it shall return the petition to the applicants along with a written description of the missing components required for the petition. Applicants may thereafter at any time re-submit the application after amending it to meet all the necessary criteria.
(ii) If the Department fails to evaluate or make a recommendation on the petition as set forth in Article VI, Section 2 (d) of the Plan, the Department shall forward the application to the Commission for its consideration without the Department’s recommendation.

(B) Commission Action. Before the Commission acts on the petition, the matter shall be set for a public hearing. The Department shall post public notices, as set forth in Article VI, Section 2 (d) of the Plan, stating the time, place and purpose of the hearing, which shall be posted within the boundaries of the proposed Neighborhood Council for 15 days. The notices shall be translated in accordance with the provisions set forth in Article VI, Section 2(d)(ii) of the Plan.

Notice of the time, place and purpose of the hearing shall also be mailed to the applicant pursuant to the time frames set forth in Article VI, Section 2 (d) of the Plan. The Commission meeting should be conducted within the boundaries of the proposed Neighborhood Council, if feasible. The Commission shall act on the incorporation petition within ten days after the expiration of the 15-day posting period, unless the Commission’s regularly scheduled meeting does not fall within this ten day period or unless the Commission and the Neighborhood Council applicants agree to an extension of time.

(C) Appeals. If the Commission approves the petition, the proposed area shall be incorporated into the Neighborhood Council named in the Incorporation Petition. If the Commission disapproves the petition, the applicants may appeal that decision to the City Council within the time frames set forth in Article VI, Section 2 (d) (vii) of the Plan. The City Council may, by ten votes, sustain, reverse or modify the Commission’s decision to disapprove the petition.

(e) Complaints Concerning Neighborhood Councils, De-Certification.

(1) Complaints Concerning Neighborhood Councils. If the Department receives a complaint of a violation of any provision of the Plan, including, but not limited to, a violation of open meeting procedures, a failure to comply with the diversity goals of the Plan, violations of the code of ethics, and/or violations of the Neighborhood Council Election Procedures, the Department shall notify the Neighborhood Council of these complaints and take steps to resolve the complaint with the Neighborhood Council. Efforts to achieve compliance with the Plan and any other applicable state, federal and local ordinances, including but not limited to complaints involving violation of open meeting procedures, a failure to comply with the diversity goals of the Plan, and/ or violations of the code of ethics must first
be made by the Department prior to initiating an action to de-certify a Neighborhood Council. For violations of the Neighborhood Council Election Procedures, the Department may, on its own, file a report with the Commission asking it to consider decertification without a complaint with the Department having first been filed, provided that the Department has already taken steps with the Neighborhood Council in an effort to achieve compliance with the Neighborhood Council Election Procedures.

(2) Involuntary De-Certification. If the Department finds that efforts taken pursuant to Subdivision (1), above, to bring the Neighborhood Council into compliance with the Plan or applicable local, state or federal laws have failed, the Department may initiate de-certification by recommending to the Commission that the Neighborhood Council be de-certified.

(A) Department Responsibilities. Once the Department has determined that efforts taken pursuant to Subdivision (1), above, to bring the neighborhood into compliance with the Plan have not been successful, the Department may initiate de-certification by taking the steps set forth in Article VI, Section 5 of the Plan.

(B) Commission Action. Before the Commission acts on a proposed de-certification, the matter shall be set for a public hearing. Fifteen days prior to the hearing, the Department shall post public notices within the boundaries of the Neighborhood Council, stating the time, place and purpose of the hearing, as set forth in Article VI, Section 5(b) of the Plan. The notices shall be translated in accordance with the provisions set forth in Article VI, Section 5(b)(iii) of the Plan. At the same time that notices are posted pursuant to Article VI, Section 5 (b) of the Plan, notice of the time, place and purpose of the hearing shall also be mailed to the Neighborhood Council.

The Commission meeting should be conducted within the boundaries of the Neighborhood Council, if feasible. The Commission shall act on the de-certification within ten days after the expiration of the 15-day posting period, unless the Commission’s next regularly scheduled meeting does not fall within this ten day period or unless the Commission and the Neighborhood Council agree to an extension of time.

The Commission may de-certify a Neighborhood Council based upon substantial evidence and upon a finding that the Neighborhood Council has failed to demonstrate the willingness or ability to comply with the provisions of the Plan or a finding that the Neighborhood Council is unwilling or unable to comply with applicable local, state and federal laws. If the Commission de-certifies a Neighborhood Council, it shall no longer be officially recognized as a certified Neighborhood
Council in the City of Los Angeles and shall return all City-owned resources, including unexpended City-appropriated funds, to the City within five days after the City has taken its final action to de-certify the Neighborhood Council.

(C) Appeals. If the Commission de-certifies a Neighborhood Council, the Neighborhood Council may file an appeal pursuant to the provisions of Article VI, Section 5 (f) of the Plan. The City Council may, by ten votes, sustain, reverse or modify the Commission’s decision to de-certify the Neighborhood Council.

(3) Voluntary De-Certification.

(A) A Neighborhood Council may file a petition with the Commission for de-certification. A de-certification application must be signed by at least 3/4 of the governing body of the Neighborhood Council seeking de-certification and must also include the following:

(i) Evidence of the processes used for outreach to stakeholders and the involvement of stakeholders in the decision to de-certify;

(ii) Evidence that stakeholders in the Neighborhood Council area have been surveyed on the de-certification application;

(iii) Evidence that the Neighborhood Council’s governing body has widely publicized within the Neighborhood Council area the fact that there is an application for de-certification pending before the Commission in its Neighborhood Council area; and

(iv) Evidence that the Neighborhood Council took its formal action on the de-certification after giving a 15-day public notice.

(B) Department Responsibilities. Fifteen days prior to the hearing, the Department shall post public notices within the boundaries of the Neighborhood Council, stating the time, place and purpose of the hearing, as set forth in Article VI, Section 6 (b) of the Plan. The notices shall be translated in accordance with the provisions set forth in Article VI, Section 6(b)(iii) of the Plan. At the same time that notices are posted pursuant to Article VI, Section 6 (b) of the Plan, notice of the time, place and purpose of the hearing shall also be mailed to the Neighborhood Council.

(C) Commission Action. The Commission meeting should be conducted within the boundaries of the Neighborhood Council, if
feasible. The Commission shall act on the de-certification within ten days after the expiration of the 15-day notice period, unless the Commission's next regularly scheduled meeting does not fall within this ten day period or unless the Commission and the Neighborhood Council agree to an extension of time. The Commission may de-certify a Neighborhood Council based upon a finding that the evidence set forth in Paragraph (A), above, has been shown and a finding that 3/4 of the governing body of the Neighborhood Council has consented to the de-certification.

If the Commission approves the petition, the Neighborhood Council shall be de-certified and will no longer be officially recognized as a certified Neighborhood Council in the City of Los Angeles and shall return all City-owned resources, including unexpended City-appropriated funds, to the City within five days after the City has made its final decision to decertify the Neighborhood Council.

(D) Appeals. If the Commission disapproves the petition, the Neighborhood Council may file an appeal pursuant to the provisions of Article VI, Section 6 (f) of the Plan. The City Council may, by ten votes, sustain, reverse or modify the Commission's decision to deny decertification of the Neighborhood Council.

(f) Early Notification System (ENS).

(1) ENS Website. The Department may assist the Information Technology Agency in coordinating the development of an ENS website through which information may be made available to certified Neighborhood Councils by the City Council, its committees, and City boards and commissions.

(2) Procedures for Sharing City Information with and Receiving Comment from Neighborhood Councils.

(A) Information from the City should be sent to certified Neighborhood Councils as soon as practical so that certified Neighborhood Councils are afforded as much opportunity as is practical to provide comment before decisions are made.

(B) Certified Neighborhood Councils may provide comment and feedback to the City Council, its committees, and to City boards and commissions by using the ENS.

(C) The Neighborhood Council may communicate its views either by way of mailed letter, fax, electronic mail (e-mail), or by a representative appearing in person to make a presentation on an
item before the City’s decision-makers. Should each certified Neighborhood Council be provided with an e-mail address, pursuant to Article VIII of the Plan, the use of this e-mail address shall be strictly limited to official Neighborhood Council business, such as communicating with Neighborhood Council members about meeting times and places and communicating with the City regarding matters of importance to Neighborhood Councils.

(g) Funding.

(1) Money appropriated in the budget each year for certified Neighborhood Councils for costs related to the functions, operations, and duties of being a certified Neighborhood Council shall be placed in the Department of Neighborhood Empowerment Fund. The functions, operations, and duties of a certified Neighborhood Council include, but are not limited to, meeting and office space, office equipment, computers, supplies, and communications, such as the costs associated with newsletters, postage, or printing written materials. At the discretion of each Neighborhood Council, and as approved by the Department of Neighborhood Empowerment, all or part of the money so appropriated may be used for neighborhood improvement projects.

(2) Any money which the Mayor and Council appropriate as grant funds each fiscal year for certified Neighborhood Councils shall be available for various neighborhood improvement projects. In order to be eligible for grant money, a certified Neighborhood Council shall submit an application to the Department and may be awarded grants, pursuant to the provisions as set forth in Article IX, Section 2 of the Plan.
Sec. 2 The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located in the Main Street lobby to the City Hall; one copy on the bulletin board located at the ground level at the Los Angeles Street entrance to the Los Angeles Police Department; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of ______MAY 20 2005______

FRANK T. MARTINEZ, City Clerk

By ________________________________
Deputy

Approved __________JUN' 01 2005________

Mayor

Approved as to Form and Legality

ROCKARD J. DELGADILLO, City Attorney

By ________________________________
GWENDOLYN R. POINDEXTER
Assistant City Attorney

Date __________MAR 23 2005________

File No. C.F. 04-1935
DECLARATION OF POSTING ORDINANCE

I, MARIA C. RICO, state as follows: I am, and was at all times hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and a Deputy City Clerk of the City of Los Angeles, California.

Ordinance No. 176784 - Adding Section 22.810.1 to Article 2, Chapter 28 of Division 22 of the Los Angeles Administrative Code regarding regulations for the Citywide System of Neighborhood Councils & to add a provision regarding Neighborhood Council Election Procedures - a copy of which is hereto attached, was finally adopted by the Los Angeles City Council on May 20, 2005, and under the direction of said City Council and the City Clerk, pursuant to Section 251 of the Charter of the City of Los Angeles and Ordinance No. 172989, on June 7, 2005. I posted a true copy of said ordinance at each of three public places located in the City of Los Angeles, California, as follows: 1) One copy on the bulletin board at the Main Street entrance to Los Angeles City Hall; 2) one copy on the bulletin board at the ground level Los Angeles Street entrance to the Los Angeles Police Department; and 3) one copy on the bulletin board at the Temple Street entrance to the Hall of Records of the County of Los Angeles.

Copies of said ordinance were posted conspicuously beginning on June 7, 2005 and will be continuously posted for ten or more days.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 7th day of June 2005 at Los Angeles, California.

Maria C. Rico, Deputy City Clerk

Ordinance Effective Date: July 17, 2005 Council File No. 04-1935
Appendix C – Neighborhood Council Plan

PLAN FOR A
CITYWIDE SYSTEM OF
NEIGHBORHOOD COUNCILS

APPROVED
MAY 30,
2001

AMENDED

November 8, 2002; May 20, 2005; October 25, 2006; February 20, 2008

August 6, 2008; February 20, 2009; March 5, 2010, September 17, 2013

December 18, 2013

EMPOWER LA
Department of NEIGHBORHOOD EMPOWERMENT
Article I

Goals and Objectives of the Neighborhood Council System

The goals and objectives of the Plan are to:

1. Promote public participation in City governance and decision making processes so that government is more responsive to local needs and requests and so that more opportunities are created to build partnerships with government to address local needs and requests.

2. Promote and facilitate communication, interaction, and opportunities for collaboration among all Certified Neighborhood Councils regarding their common and disparate concerns. Neighborhood Councils may join together in regional and citywide alliances as a means to engage in communication, interaction and collaboration.

3. Facilitate the delivery of City services and City government responses to Certified Neighborhood Councils' problems and requests for assistance by helping Certified Neighborhood Councils to both identify and prioritize their needs and to effectively communicate those needs.

4. Ensure equal opportunity to form Certified Neighborhood Councils and participate in the governmental decision making and problem solving processes.

5. Create an environment in which all people can organize and propose their own Certified Neighborhood Councils so that they develop from the grassroots of the community.

6. Foster a sense of community for all people to express ideas and opinions about their neighborhoods and their government.

* Amended 2/20/09 per Council resolution
Article II

Desired Characteristics of Neighborhood Councils

1. Inclusive Membership

Certified Neighborhood Councils shall be diverse, inclusive and open to all Community Stakeholders. A Community Stakeholder is defined as any individual who lives, works or owns real property in the neighborhood and also to those who declare a stake in the neighborhood as a community interest stakeholder, defined as a person who affirms a substantial and ongoing participation within the neighborhood council's boundaries and who may be in a community organization such as, but not limited to, educational, non-profit and/or religious organizations.

2. Statement of Non-Discrimination

Certified Neighborhood Councils must encourage all Community Stakeholders to participate in all of their activities, and may not discriminate in any of their policies, recommendations or actions against any individual or group on the basis of race, religion, color, creed, national origin, ancestry, sex, sexual orientation, age, disability, marital status, income, homeowner status, renter status or political affiliation.

3. Transparent Operations

Certified Neighborhood Councils shall adopt fair and open procedures for the conduct of their business.

4. Independent Entities

Certified Neighborhood Councils shall be as independent, self-governing, and self-directed as possible. The Department of Neighborhood Empowerment (DONE) shall assist Certified Neighborhood Councils to pursue options, including, but not limited to, tax-exempt status and/or non-profit incorporation, to strengthen their independence. Tax-exempt status and/or non-profit incorporation will have no effect on a Certified Neighborhood Council's eligibility for assistance, monetary or otherwise, from DONE.

*Amended 12/18/13 per Council Resolution

** Amended 2/20/09 per Council Resolution
Article III

Certification of Neighborhood Councils

1. DONE responsibilities. On July 1, 2001, after the adoption of the Neighborhood Council Plan, DONE shall:

(a) Announce and inform the public of the Neighborhood Council certification process Citywide, but DONE shall not accept completed certification applications until October 1, 2001.

(b) Actively promote the formation of Certified Neighborhood Councils Citywide, giving emphasis to those areas and Community Stakeholder groups with traditionally low rates of civic participation in government.

(c) Facilitate and encourage collaboration and discussion among neighboring and overlapping applicant groups and provide technical assistance on how to proceed with a unified certification application, and provide dispute resolution services to applicants where more than one application is submitted for a Neighborhood Council boundary area to gain consensus on a unified certification application.

2. Components of a Certification Application. A certification application shall, at a minimum, include the components listed in this section.

Boundaries

(a) A detailed description of proposed boundaries shall be provided, including a rationale for drawing the proposed boundaries. Neighborhood Council applicants within a proposed Neighborhood Council boundary shall, to the extent feasible, work together in setting boundaries.

- In identifying proposed Neighborhood Council boundaries, applicants are encouraged to reference other types of existing boundaries, including, but not limited to, the following:

  (i) Census tracts as a means of complying with the minimum population size of 20,000 Neighborhood Council Community Stakeholders.

  (ii) City service and planning areas, such as police and fire districts or Community Planning Area boundaries.

- A proposed set of boundaries should, to the maximum extent feasible, follow historic and contemporary community and neighborhood borders, and shall utilize natural boundaries or street lines and be geographically compact and contiguous.

- The boundaries of two or more Certified Neighborhood Councils may not overlap with one another, unless the area for proposed inclusion into each
Certified Neighborhood Council is designed for a public use, such as a park, school, library, police or fire station, major thoroughfare, or contains a landmark or facility with historical significance.

- The inaugural boundaries of all Certified Neighborhood Councils shall be the limits of the City of Los Angeles (City). The boundaries of a Certified Neighborhood Council are encouraged to remain within the City limits because the City can only guarantee delivery of its services to City residents.

- Neighborhood Council boundaries should be comprised of no less than 20,000 Neighborhood Council Community Stakeholders. Areas that have fewer than 20,000 Neighborhood Council Community Stakeholders may be certified provided they meet the following criteria:
  
  (i) The proposed area is separated from adjacent communities by significant geographic features; or,

  (ii) The proposed area is identified by name within any of the 36 adopted Community Plan Areas of the City Planning Department; or,

  (iii) The proposed area represents a historic, identifiable neighborhood or community that is serviced by City service providers, such as a public library, park, recreation center, fire or police station, or a public school.

- A Neighborhood Council that comprises fewer than 20,000 Neighborhood Council Community Stakeholders must satisfy all requirements of this Plan.

**Outreach**

(b) The outreach process used to identify stakeholders within the proposed Neighborhood Council boundary must be described in detail. In order to demonstrate a good faith effort towards achieving a diversity of stakeholder representation, an applicant(s) shall collect no less than 200 and no more than 500 signatures from stakeholders that have an interest within the proposed Neighborhood Council boundaries. Signatures shall, to the maximum extent feasible, reflect the broadest array of Community Stakeholders who will actively participate in the proposed Neighborhood Council.

**Bylaws**

(c) Bylaws shall be established, including the following information.

  (i) Neighborhood Council name

  (ii) Stakeholder Membership and the Governing Body

     (1) The bylaws shall state that the Neighborhood Council membership is open to all Community Stakeholders.
(2) The bylaws shall include a list of offices of the Governing Body and a method for regularly electing or selecting officers who shall serve as the Governing Body. For the purposes of this Plan, the term Governing Body refers to Community Stakeholders of a Certified Neighborhood Council who are empowered to make decisions on behalf of that Certified Neighborhood Council.

(a) A Neighborhood Councils governing body must, to the extent possible, reflect the diversity of the neighborhood council's stakeholders. All stakeholders must be eligible to vote and run for at least one board seat. Neighborhood councils may allocate their board seats to specific stakeholder categories and establish stakeholder eligibility requirements in voting for the board seats. If a neighborhood council allocates its board seats to specific stakeholder categories, then the neighborhood council must include at least one seat for which every stakeholder is eligible to vote and run. Neighborhood councils may not allocate a majority of their board seats to a single stakeholder group, unless approved by the Department upon a showing of extenuating circumstances. The election procedures created by the Department or City Clerk pursuant to the Los Angeles Administrative Code Section 20.36 shall require, in a situation where neighborhood council requires that a stakeholders to provide proof of eligibility, that proof of stakeholder status for community interest stakeholders must be consistent and substantially equivalent to the evidentiary proof required of stakeholders who live, work, or own property.*

(b) Terms of members of the Governing Body shall be for two or four years, to be decided upon by individual Neighborhood Councils. ** Neighborhood Councils may limit the total number of terms that a member of the Governing Body may serve, if the term limitations are set forth in the Neighborhood Council’s bylaws after the date this provision was amended. ***

(iii) Meeting procedures. Each Certified Neighborhood Council shall:

(1) Meet at least once per calendar quarter.

(2) Obey any or all sections of the State of California's open meeting procedures that apply to Neighborhood Councils (Ralph M. Brown Act), which includes posting meeting notices in generally accepted public places or through electronic media, such as e-mail or posting notice on DONE's Web page.

(3) Establish procedures for communicating with all Neighborhood Council Community Stakeholders on a regular basis in a manner ensuring that information is disseminated evenly and in a timely manner.

(4) A process for running meetings, including:

(a) The number of Governing Body members that constitute a majority and a quorum;
(b) The number of votes by a Governing Body for a Certified Neighborhood Council to take an official action, such as adoption of an item or position; and,

(c) The way in which a vote by the Governing Body or action by a Certified Neighborhood Council can be reconsidered, if applicable.

(iv) A grievance procedure shall be established by which an individual Community Stakeholder or group of Community Stakeholders of a Certified Neighborhood Council shall be able to express concerns to their Governing Body about its decisions and actions.
Financial Accountability

(a) A system of financial accountability shall be established that governs a Certified Neighborhood Council's use of its funds. Each Certified Neighborhood Council shall:

(i) Prescribe a method for keeping a book of accounts that complies with applicable local, state, and federal laws, which includes any or all provisions of Generally Accepted Accounting Principles that apply to a Certified Neighborhood Council, according to the type of entity established by a Certified Neighborhood Council.

(ii) Discuss its finances at a regularly scheduled or special meeting, prior to submitting an account statement to DONE (as prescribed below), in order to gather input from Neighborhood Council Community Stakeholders.

(iii) Ensure that each Certified Neighborhood Council's book of accounts shall be open to all Community Stakeholders of any Certified Neighborhood Council.

(iv) Establish a process by which each Certified Neighborhood Council member can review the Certified Neighborhood Council's book of accounts.

➢ Each Certified Neighborhood Council's Governing Body shall include an officer named the Treasurer, whose duties shall include maintaining the Neighborhood Council's book of accounts, as prescribed by DONE, and submitting account statements to DONE no less than once and no more than twice during each fiscal year, the date(s) of which shall be prescribed by DONE. Refusal to submit accounting information as required by DONE shall be grounds for consideration of de-certification (as defined in Article VI, Section 5 of this Plan).

Ethics

(b) Each Certified Neighborhood Council shall be subject to any or all applicable sections of the City of Los Angeles Governmental Ethics Ordinance (Los Angeles Municipal Code Section 49.5.1). All applicable laws of local, state, and federal government shall be the minimum ethical standard for a Certified Neighborhood Council, its Governing Body, and Community Stakeholders.

Contacts

(c) Every application shall include contact information for no less than three and no more than five people who shall act as official contacts between the applicants and DONE until the proposed Neighborhood Council is certified.
Article IV

Certification Process

1. DONE staff shall evaluate a certification application to determine whether the application meets all of the criteria set out in Article III, Section 2, "Components of a Certification Application."

2. Once a certification application is submitted to DONE, the application shall be held by DONE for a period of 20 business days. During said period, DONE shall begin its evaluation of the application to ensure that it is complete.

   (a) At the end of said 20 business-day period, if only one application is submitted that describes a specific set of boundaries for a proposed Neighborhood Council and if the application is complete according to DONE's evaluation, DONE shall:

      (i) Forward the application, any accompanying information, and its recommendation to the Board of Neighborhood Commissioners (Commission) for consideration; and,

      (ii) Notify the Neighborhood Council contacts (named in Article II, Section 2(f)), in writing, that the application has been forwarded to the Commission for its consideration.

      (iii) If DONE fails to evaluate or forward the application (and any accompanying information, including its recommendation) to the Commission within said time period, DONE shall automatically forward the application without a recommendation to the Commission for consideration.

   (b) If DONE receives two or more certification applications within said 20 business-day period that identify the same, similar, or overlapping proposed Neighborhood Council boundaries, DONE shall immediately notify, in writing, all contacts for all affected applicant groups in an effort to work with affected parties to produce a unified application. Applicants of the proposed Neighborhood Councils shall have 20 business days from the date notification is given by DONE to develop a unified application.

      (i) If consensus is reached at any time within said 20 business-day period or at any time during an extended time period pursuant to Article IV, Section 2(b)(ii), said period shall be terminated and all applications shall be deemed received by DONE for evaluation. In the event that all affected applicant groups agree in writing to terminate, for any reason, the process of developing a unified application within the 20 business-day period, all applications, as originally submitted, shall be deemed received by DONE for evaluation. If no consensus is reached within or at the end of the 20 business-day period, the applications, as originally submitted, shall be deemed received by DONE for evaluation.
(ii) The 20 business-day period described in (i) above may be extended by DONE if all certification applicants make such a request in writing within the time period in (i) above. If no consensus is reached within or at the end of the 20 business-day period, the applications, as originally submitted, shall be deemed received by DONE for evaluation.

(iii) Once an application has been deemed received by DONE for evaluation through the processes described in (i) or (ii) above, DONE shall have ten business days to evaluate all applications as submitted. At the end of its ten business-day evaluation period, if DONE determines that all or some of the applications are complete according to DONE's evaluation, DONE shall forward the application, any accompanying information, and its recommendation to the Commission for consideration. If DONE fails to evaluate or forward the application (and any accompanying information, including its recommendation) to the Commission within said time period, DONE shall automatically forward the application without a recommendation to the Commission for consideration.

(c) If, at any time during the processes described in this section, DONE determines that an application is incomplete, it shall return the application to the applicants along with a detailed list in writing of the missing components required in a certification application and suggestions on how to incorporate missing components. Applicants whose certification application was determined to be incomplete and returned by DONE may at any time re-submit the application after amending it to meet all the necessary criteria.

3. DONE shall have ten business days, from the date that it forwards an application to the Commission for consideration, to prepare, translate (if necessary), and post public notices that a group has applied for certification according to the following:

(a) A copy of the notice shall be posted in at least five public, easily accessible places within the boundaries of the proposed Neighborhood Council. Examples of appropriate posting locations include, but are not limited to, libraries, police or fire stations, or DONE's Web site.

(b) Copies of the notice shall be posted for 15 business days.

(c) The notice shall be translated into all languages other than English that the City Clerk Election Division uses to produce sample ballot information if the proposed Neighborhood Council boundaries include communities where such languages are spoken. At the present time, a sample ballot is published in Chinese, English, Japanese, Korean, Spanish, Tagalog, and Vietnamese. This list of languages may change from time to time, and DONE shall be responsible for keeping current with said changes. DONE shall be responsible for translating the notice into any other language upon request.

4. Within the same ten business-day time period referenced in Article IV, Section 3, DONE shall provide written notice to the applicant group of the date that the Commission will conduct its public hearing during which the applicant's certification application will be considered.
5. Within ten business days after the expiration of the 15 business-day public notice period described in Article IV, Section 3(b), the Commission shall conduct a public hearing to take testimony from members of the public regarding the submitted certification application. The following shall apply:

(a) The public hearing shall be conducted as part of the Commission's next regularly scheduled meeting or as part of a special meeting if no regularly scheduled meeting falls within said ten business-day period.

(b) The Commission meeting shall be conducted within the boundaries of the proposed Neighborhood Council.

6. During the meeting where the Commission conducts a public hearing for the purpose of considering a certification application, and at the close of the public comment period and after the Commission's deliberations, the Commission shall either approve or reject the certification application. With concurrence from the applicant, the Commission may defer its decision on a certification application until its next regularly scheduled meeting in order to receive additional information on a matter brought to its attention during its public hearing or to allow for more time to consider the application.

7. In a case where two or more certification applications have identified the same, similar, or overlapping Neighborhood Council boundaries, the Commission shall, based on all available information, make a final determination on how the final boundaries of each Neighborhood Council shall be drawn.

8. If the Commission approves the application, the applicants shall be deemed certified and recognized as a Neighborhood Council in the City of Los Angeles.

9. If the Commission rejects the application, the applicants may, within five meeting days of the City Council during which the Council has convened in regular session, file an appeal with the City Council. The appeal will automatically be placed on the Council's next regular agenda for consideration. The Council may, by ten votes, sustain, reverse, or modify the Commission's decision.
Article V

Neighborhood Council Elections*

1. Compliance

Neighborhood Councils that choose to elect their Governing Body will have their elections administered pursuant to Los Angeles Administrative Code Section 20.36.

2. Governing Body Operations

Neighborhood Councils shall be empowered to allocate the Governing Body seats, determine voting rights, including the allocation of different voting roles to different categories of Community Stakeholders, and establish other voting procedures, consistent with the Charter, this Plan and the Regulations that implement this Plan, and any procedures issued by the City Clerk or DONE. Any Governing Body structures and voting systems adopted should not limit broad participation by Community Stakeholders of a Neighborhood Council.

3. Violations

A violation of the election procedures shall constitute a violation of this Plan and may subject a Neighborhood Council to the decertification procedures set forth in Article VI of this Plan, either upon submission of a complaint as outlined in Article VI, Section 4 of this Plan, or by DONE filing a report with the Commission asking it to consider decertification, after having first taken steps in an effort to achieve compliance with the election procedures.

*Amended 09/17/13 per Council Resolution
Article VI

Certified Neighborhood Council Self Assessment, Boundary and Bylaw Adjustment, Complaints, and De-Certification

1. Self Assessment

Each Certified Neighborhood Council shall, with the assistance of DONE as requested, survey its Community Stakeholders at least once biennially, to assess whether their Certified Neighborhood Council has met applicable goals set forth in the Charter and Article I, "Goals and Objectives of the Neighborhood Council System". The form of the review shall be prescribed by DONE, and the results of the review shall be made public and posted on DONE's Web site. A copy of the review shall be sent to the affected Certified Neighborhood Council.

2. Boundary Adjustment

(a) A Certified Neighborhood Council may petition the Commission to adjust its boundaries. All such petitions shall remain in accordance with Article III, Section 2. Reasons for boundary adjustment may include, but are not limited to:

(i) Including an uncertified adjacent community;

(ii) Reconfiguring based on population decrease or increase; or,

(iii) Increasing or reducing a Certified Neighborhood Council's size to increase effectiveness and efficiency.

(b) Petitions shall be reviewed by DONE which shall forward the petition, any accompanying information, and its recommendation, within 15 business days of receipt, to the Commission for consideration at its next regularly scheduled meeting. If the Commission approves the petition, the Neighborhood Council boundary shall be deemed changed. If the Commission rejects the petition, the Governing Body of the petitioning Certified Neighborhood Council may take an action to, within five meeting days of the City Council during which the Council has convened in regular session, file an appeal with the City Council. The appeal will automatically be placed on the Council's next regular agenda for Council consideration. The Council may, by ten votes, sustain, reverse, or modify the Commission's decision.

(c) The Commission shall have the authority to expand a Certified Neighborhood Council's boundary in order to incorporate an area of the City that has not formed a Certified Neighborhood Council into the boundary of another, adjoining Certified Neighborhood Council, provided that:

(i) The proposed area to be incorporated into a Certified Neighborhood Council's boundary lies between two or more Certified Neighborhood Councils;
(ii) The area to be incorporated does not qualify for certification under the provisions of this Plan; and,

(iii) Community Stakeholders of the area to be incorporated and of the affected Certified Neighborhood Council(s) agree to the proposed incorporation.

(d) If incorporation of an area into an existing Certified Neighborhood Council's boundary is initiated by an entity other than the Commission, Community Stakeholders of the area to be incorporated and of the affected Certified Neighborhood Council(s) must agree to the proposed incorporation prior to consideration by the Commission. The following process shall apply.

(i) An Incorporation Petition, as prescribed by DONE, shall be completed in order to document the proposed incorporation. An Incorporation Petition shall be filed with DONE for evaluation.

(a) DONE shall have 20 business days from receipt of the Incorporation Petition to evaluate the incorporation request. If an Incorporation Petition is complete according to DONE's evaluation, DONE shall forward the Incorporation Petition, any accompanying information, and its recommendation to the Commission for consideration. If DONE fails to evaluate or forward the Incorporation Petition (and any accompanying information, including its recommendation) to the Commission within said time period, the Incorporation Petition shall be automatically forwarded to the Commission for consideration.

(b) If, at any time during the processes described in this section, DONE determines that an Incorporation Petition is incomplete, it shall return the petition to the applicants along with a detailed list in writing of DONE's objections to the Incorporation Petition and suggestions on how to revise the Incorporation Petition. An Incorporation Petition returned by DONE may at any time be re-submitted after it is amended to meet all the necessary criteria cited by DONE.

(ii) DONE shall have ten business days, from the date that it forwards an Incorporation Petition to the Commission for consideration, to prepare, translate (if necessary), and post public notices that an Incorporation Petition has been received, according to the following:

(a) A copy of the notice shall be posted in at least five public, easily accessible places within the boundaries of the proposed incorporated area and all affected Neighborhood Councils. Examples of appropriate posting locations include, but are not limited to, libraries, police stations, fire stations, or DONE's Web site.

(b) Copies of the notice shall be posted for 15 business days.

(c) The notice shall be translated into all languages other than English that the City Clerk Election Division uses to produce sample ballot information if the
proposed Neighborhood Council boundaries include communities where such languages are spoken. At the present time, a sample ballot is published in Chinese, English, Japanese, Korean, Spanish, Tagalog, and Vietnamese. This list of languages may change from time to time, and DONE shall be responsible for keeping current with said changes. DONE shall be responsible for translating the notice into any other language upon request.

(iii) Within the same ten business-day time period referenced in Article VI, Section 2(d)(ii), DONE shall provide written notice to the applicant group of the date that the Commission will conduct its public hearing during which the applicant's Incorporation Petition will be considered.

(iv) Within ten business days after the expiration of the 15 business day public notice period described in Article VI, Section 2(d)(ii)(b), the Commission shall conduct a public hearing to take testimony from members of the public regarding the proposed incorporation. The following shall apply:

(a) The public hearing shall be conducted as part of the Commission's next regularly scheduled meeting or as part of a special meeting if no regularly scheduled meeting falls within said ten business-day period.

(b) The Commission meeting shall be conducted within the boundaries of the proposed incorporated area or within the boundaries of any of the affected Certified Neighborhood Councils.

(v) During the meeting where the Commission conducts a public hearing for the purpose of considering an Incorporation Petition, and at the close of the public comment period and after the Commission's deliberations, the Commission shall either approve or reject the Incorporation Petition. With concurrence from the applicant, the Commission may defer its decision on an Incorporation Petition until its next regularly scheduled meeting in order to receive additional information on a matter brought to its attention during its public hearing or to allow for more time to consider the Incorporation Petition.

(vi) If the Commission approves the Incorporation Petition, the proposed area shall be incorporated into the specified Certified Neighborhood Council named in the Incorporation Petition. If the Commission rejects the Incorporation Petition, the applicants may, within five meeting days of the City Council during which the Council has convened in regular session, file an appeal with the City Council. The appeal will automatically be placed on the Council's next regular agenda for Council consideration. The Council may, by ten votes, sustain, reverse, or modify the Commission's decision.
3. Bylaw Adjustment

A Certified Neighborhood Council that wishes to change or adjust its bylaws shall complete an Application to Change or Adjust Bylaws, as prescribed by DONE, and submit the application to DONE for evaluation. DONE shall have ten business days from receipt of the application to complete its evaluation.

(a) If DONE determines that the application is incomplete, it shall return the application to the Governing Body of the affected Certified Neighborhood Council along with a detailed list in writing of missing or incomplete items in the application and suggestions on how to complete the application successfully. An application returned by DONE may at any time be re-submitted after it is adjusted to meet all the necessary criteria cited by DONE.

(b) If the application is complete and consistent with the principles governing a Certified Neighborhood Council’s purpose or operations according to DONE’s evaluation, DONE shall file the application and the change in the affected Certified Neighborhood Council’s bylaws shall be deemed approved. Upon filing the change, DONE shall provide written notice to the affected Certified Neighborhood Council that the change in its bylaws was duly recorded with DONE.

(c) Changes to a Certified Neighborhood Council’s Governing Body structure shall be approved by the Commission. In addition, if DONE determines that the changed bylaws are inconsistent with the principles governing a Certified Neighborhood Council’s purpose or operations, DONE shall forward an evaluation to the Commission for its review. The Commission, at its next regularly scheduled meeting, shall approve or reject the change in bylaws application. If the Commission approves the change of bylaws, the Certified Neighborhood Council’s proposed bylaws shall be deemed approved and become effective immediately. If the Commission rejects the change of bylaws application, the Certified Neighborhood Council’s bylaws shall remain as adopted prior to the filing of the application. *

4. Complaints Against Certified Neighborhood Councils

Complaints against a Certified Neighborhood Council of any nature shall be filed with DONE, on a form prescribed by DONE. A copy of the complaint shall be delivered by DONE to the affected Certified Neighborhood Council against which the complaint is made within five business days of receipt of the complaint. Exhaustive efforts to remedy all complaints shall be taken by DONE. In the case where a complaint is in regards to a violation of this Plan and a remedy cannot be reached, the process prescribed in Article VI, Section 5 shall be followed.

5. Involuntary De-Certification of a Certified Neighborhood Council

Before initiating de-certification of a Certified Neighborhood Council, DONE shall take all steps available to remedy a violation of the Plan. If DONE finds that efforts to comply with a proposed remedy have failed, the General Manager of DONE shall initiate a process of de-certification.
*Amended 2/20/09 per Council Resolution
(a) DONE shall complete an Application to De-Certify a Certified Neighborhood Council, as prescribed by DONE, and immediately transmit a copy of the application to both the Commission, for consideration at its next regularly scheduled meeting, and to the affected Certified Neighborhood Council.

(b) DONE shall, immediately after transmitting copies of the application to the Commission and affected Certified Neighborhood Council, post public notices that a de-certification application has been filed with the Commission according to the following:

(i) A copy of the notice shall be posted in at least five public, easily accessible places within the boundaries of the affected Neighborhood Council, and shall post the notice on DONE's Web site. Examples of appropriate posting locations include, but are not limited to, libraries, police stations, or fire stations.

(ii) Copies of the notice shall be posted for 15 business days.

(iii) The notice shall be translated into all languages other than English that the City Clerk Election Division uses to produce sample ballot information if the proposed Neighborhood Council boundaries include communities where such languages are spoken. At the present time, a sample ballot is published in Chinese, English, Japanese, Korean, Spanish, Tagalog, and Vietnamese. This list of languages may change from time to time, and DONE shall be responsible for keeping current with said changes. DONE shall be responsible for translating the notice into any other language upon request.

(c) Within ten business days after the expiration of the 15 business day public notice period described in Article VI, Section 5(b)(ii), the Commission shall conduct a public hearing to take testimony from members of the public regarding the proposed de-certification application. The following shall apply:

(i) The public hearing shall be conducted as part of the Commission's next regularly scheduled meeting or as part of a special meeting if no regularly scheduled meeting falls within said ten business-day period.

(ii) The Commission meeting shall be conducted within the boundaries of the affected Certified Neighborhood Council proposed for de-certification.

(d) During the meeting where the Commission conducts a public hearing for the purpose of considering a de-certification application, and at the close of the public comment period and after the Commission's deliberations, the Commission shall either approve or reject the de-certification application. With concurrence from the affected Certified Neighborhood Council, the Commission may defer its decision on the application until its next regularly scheduled meeting in order to receive additional information on a matter brought to its attention during its public hearing or to allow for more time to consider the application.

300
6. Voluntary De-Certification of a Certified Neighborhood Council

A Certified Neighborhood Council may petition the Commission to be de-certified as a Certified Neighborhood Council in the City of Los Angeles.

(a) An Application to De-Certify a Certified Neighborhood Council, as prescribed by DONE, shall be completed and signed by at least 3/4 of the Governing Body of the affected Certified Neighborhood Council seeking de-certification. The application shall be filed with DONE.

(b) DONE shall have ten business days, from the date of receipt of an application, to prepare, translate (if necessary), and post public notices that a group has applied for de-certification according to the following:

(i) A copy of the notice shall be posted in at least five public, easily accessible places within the boundaries of the affected Neighborhood Council, and shall post the notice on DONE's Web site. Examples of appropriate posting locations include, but are not limited to, libraries, police stations, or fire stations.

(ii) Copies of the notice shall be posted for 15 business days.

(iii) The notice shall be translated into all languages other than English that the City Clerk Election Division uses to produce sample ballot information if the proposed Neighborhood Council boundaries include communities where such languages are spoken. At the present time, a sample ballot is published in Chinese, English, Japanese, Korean, Spanish, Tagalog, and Vietnamese. This list of languages may change from time to time, and DONE shall be responsible for keeping current with said changes. DONE shall be responsible for translating the notice into any other language upon request.

(c) Within ten business days after the expiration of the 15 business day public notice period described in Article VI, Section 6(b)(ii), the Commission shall conduct a public hearing to take testimony from members of the public regarding the proposed decertification application. The following shall apply:

301
The public hearing shall be conducted as part of the Commission's next regularly scheduled meeting or as part of a special meeting if no regularly scheduled meeting falls within said ten business-day period.

The Commission meeting shall be conducted within the boundaries of the affected Certified Neighborhood Council proposed for de-certification.

During the meeting where the Commission conducts a public hearing for the purpose of considering a de-certification application, and at the close of the public comment period and after the Commission's deliberations, the Commission shall either approve or reject the de-certification application. The Commission may defer its decision on the application until its next regularly scheduled meeting in order to receive additional information on a matter brought to its attention during its public hearing or to allow for more time to consider the application.

If the Commission approves the application, the affected Certified Neighborhood Council shall be deemed de-certified and will be no longer be recognized as a Certified Neighborhood Council in the City of Los Angeles.

If the Commission rejects the de-certification application, Community Stakeholders of the affected Certified Neighborhood Council, who have regularly attended the affected Certified Neighborhood Council's meetings, that has filed for de-certification and who disagree with the Commission's decision may appeal. The applicants may, within five meeting days of the City Council during which the Council has convened in regular session, file an appeal with the City Council. The appeal will automatically be placed on the Council's next regular agenda for Council consideration. The Council may, by ten votes, sustain, reverse, or modify the Commission's decision.

A Certified Neighborhood Council shall return all City-owned resources, including unexpended City-appropriated funds, to the City immediately upon its decertification.
Article VII

Responsibilities of the Department of Neighborhood Empowerment

At a minimum, the Department of Neighborhood Empowerment shall:

1. Implement and oversee compliance with City ordinances and regulations relating to a Citywide system of Neighborhood Councils.

2. Assist neighborhoods and Certified Neighborhood Councils with public and civic education, outreach, and training with an emphasis given to areas that have traditionally low rates of participation in government.

3. Assist applicants and neighborhoods with preparation of all petitions and forms referenced in this Plan, identify suitable Neighborhood Council boundaries, and organize Neighborhood Councils in accordance with this Plan.

4. Help coordinate meetings and facilitate communication among Certified Neighborhood Councils that request assistance.

5. Help coordinate, arrange, and convene the biannual Congress of Neighborhood Councils meetings.

6. Promote and facilitate open communication among City agencies and Certified Neighborhood Councils, and provide education, guidance, and assistance in developing strategies for providing comments and feedback to the City Council and its committees and City boards and commissions.

7. Assist Certified Neighborhood Councils with the selection of their Governing Body and conduct the City’s portion of the outreach effort necessary to mobilize stakeholders to vote in Neighborhood Council elections. *

8. Provide operational support to and facilitate the sharing of resources among Certified Neighborhood Councils, including, but not limited to, meeting and office space, office equipment, and mail and communications in order to communicate among constituents, Certified Neighborhood Councils, and government officials.

9. Create and maintain a database of information about Certified Neighborhood Councils, including, among other information, names and contact information that will be available for public use.

10. Act as an information clearinghouse and resource to Certified Neighborhood Councils.

11. Create and maintain an Early Notification System as prescribed in this Plan.

12. Assure equal opportunity to form and develop Certified Neighborhood Councils. DONE shall assist groups and Community Stakeholders seeking Certified Neighborhood Council status by:
* Amended 02/20/08 per Council Resolution
(a) Helping understand the processes and procedures for establishing a Certified Neighborhood Council.

(b) Assisting with completion of certification application.

(c) Providing assistance to areas with traditionally low rates of participation in government.

(d) Mitigating barriers to participation, such as the need for translation and childcare services.

13. Review and evaluate the Citywide system of Neighborhood Councils. As part of its annual report, DONE shall provide information on the size, geographic scope, and economic and demographic conditions of areas of the City in which Certified Neighborhood Councils have and have not been certified.

14. Report quarterly, commencing from the adoption date of this Plan, to the appropriate Council Committee on the Department's certification efforts, and on strategies and recommendations for certifying areas with traditionally low rates of civic participation in government to ensure participation by all the City's neighborhoods in the certification process.

15. Arrange training for Neighborhood Councils' officers and staff.

16. Provide adequate levels of staffing, with consideration to resource availability, for each Certified Neighborhood Council.
Article VIII

Early Notification System

DONE shall create and maintain an Early Notification System (ENS) in accordance with City Charter Section 907. The ENS is designed to supplement current state and local laws regarding public notification. The ENS will operate according to the following:

1. Subject to all other provisions of this Plan, all Certified Neighborhood Councils shall be provided access to a computer and to the Internet. DONE shall provide technical training on the use of a computer to each Certified Neighborhood Council.

2. An ENS Web site shall be created and maintained where information regarding the City Council and its committees and City boards and commissions will be available.

3. In addition to accessing information through the ENS Web site, Certified Neighborhood Councils will be able to subscribe to services whereby they will receive electronic mail notifications regarding updates to the information on the ENS Web site.

4. Information on the ENS Web site shall be provided as soon as is practical so that Certified Neighborhood Councils are afforded an opportunity to prepare and provide comments before decisions are made.

5. The City shall provide each Certified Neighborhood Council with an electronic mail (e-mail) address. The use of this e-mail address shall be limited strictly to official Certified Neighborhood Council business, such as communicating with Neighborhood Council Community Stakeholders about meeting times and places and communicating with the City on matters of importance to the Certified Neighborhood Council. Each Certified Neighborhood Council shall be required to use the City's officially designated e-mail address to correspond with City departments and agencies if the Certified Neighborhood Council expects their correspondence to be entered into the public record.

6. Certified Neighborhood Councils shall be allowed to provide comment and feedback electronically to the City Council, its committees, and City boards and commissions via the ENS. Comments from a Certified Neighborhood Council's officially designated e-mail address (as described in Article VIII, Section 5) shall be printed and placed into the public record.

7. DONE may coordinate additional information for distribution through the ENS from public or private entities as they directly relate to Certified Neighborhood Councils and issues affecting Certified Neighborhood Councils, provided that they are subject to all regulations and requirements of this Plan.
Article IX

Funding*

1. At the beginning of each fiscal year, the Mayor and Council shall appropriate money for Certified Neighborhood Councils for costs related to the functions, operations, and duties of being a Certified Neighborhood Council. Such functions, operations, and duties include, but are not limited to, meeting and office space, office equipment, computers, supplies, and communications, such as costs associated with newsletters, postage, or printing written materials. At the discretion of each neighborhood council, and as approved by the DONE, all or part of the money so appropriated may be used for neighborhood improvement projects.

2. Any money which the Mayor and Council appropriate as grant funds each fiscal year shall be made available to Certified Neighborhood Councils for various neighborhood improvement projects. In order to be eligible for grant money, a Certified Neighborhood Council shall submit an application to DONE, as prescribed by DONE. Grant money shall be awarded to Certified Neighborhood Councils based on criteria and procedures established by DONE and the Commission. Each Certified Neighborhood Council that receives grant money shall be required to account for its expenditures pursuant to this Plan (Article III, Section 2(d)).

*Amended 11/08/02 per Council Resolution
Article X *

Financial Accountability and Technical Assistance Policy

1. Preliminary Review of Expenditures

The DONE may make a preliminary review of any expenditure or financial transactions contemplated by a Certified Neighborhood Council to ensure that it is acceptable, appropriate, and comports with DONE guidelines and laws that pertain. Where a Certified Neighborhood Council is unsure whether a proposed expenditure is appropriate, it shall make a written request for guidance from the DONE on the matter before any commitment to expend funds is made or the transaction is completed.

2. Expenditure Oversight

The DONE may monitor and review any and all financial transactions made by a Certified Neighborhood Council as follows:

(a) Computer based [on-line] review of any information concerning Commercial Prepaid Card transactions, negotiable instruments, or any other applicable method by which Certified Neighborhood Councils may access City funds and make financial transactions.

(b) On-site review of any Certified Neighborhood Council’s accounts, statements, books, records, receipts, invoices, or any other document that evidences any financial transaction.

(c) A DONE in-house review of any Certified Neighborhood Council’s accounts and business records prior to releasing funds to the Certified Neighborhood Council for the conduct of its business.

3. Admonition

When the DONE determines that a Certified Neighborhood Council has failed to account for its funds or has misused its funds, then the DONE may issue a Fiscal Responsibility Admonition Letter informing the Certified Neighborhood Council of the problem. Where the DONE deems it necessary, the Financial Responsibility Admonition Letter may request as follows:

(a) That the Certified Neighborhood Council take specific corrective action to comply with Generally Accepted Accounting Principles or those prescribed by the DONE under the Neighborhood Council Funding Program.

(b) That the Treasurer, or any other Certified Neighborhood Council representative, shall meet with the DONE staff to discuss accounting practices or any other financial matter involving the Certified Neighborhood Council and, thereafter, follow a remedial plan as prescribed by the DONE.
4. Corrective Action and Remedial Measures

If the DONE determines that a Certified Neighborhood Council has misused its funds, then the DONE may impose corrective action or remedial measures on the Certified Neighborhood Council. The DONE’s decision to impose corrective action or remedial measures, or both, is final; except where de-certification is initiated as set forth in Section 22.810.1(e)(2) of the Los Angeles Administrative Code.

5. Corrective Action

As outlined in the DONE’s Fiscal Responsibility Admonition Letter, the corrective action prescribed by the DONE may include, but is not limited to, the following:

(a) Denying funding requests for payment on purchases or transactions deemed unacceptable or a misuse of public funds.

(b) Suspending all access to and the use of Certified Neighborhood Council funds, including Commercial Prepaid Cards or City issued demand warrants.

(c) Reducing funding to a Certified Neighborhood Council in amounts that equal or approximate the amount necessary to compensate for, or remedy, any unacceptable purchase or financial transaction, or to redeem misused public funds; including any administrative or incidental costs associated therewith.

6. Remedial Measures

The DONE is authorized to impose remedial measures on any Certified Neighborhood Council when the Department determines that an unacceptable purchase, financial transaction, or misuse of public funds has occurred, or may occur, in violation of accounting principles, DONE guidelines, or laws that pertain. Any remedial measures imposed by DONE will be identified in a Fiscal Responsibility Admonition Letter and may include any combination of corrective actions and remedial measures that the DONE deems appropriate under the circumstances.

In an effort to insure that the Certified Neighborhood Councils operate in a fiscally responsible manner and to support the financial integrity of the Neighborhood Council Funding Program, the Department may impose the following remedial measures:

(a) Require mandatory supplemental training for any treasurer or fiscal agent of a Governing Body or, if necessary, the entire Governing Body of the Certified Neighborhood Council.

(b) Require that the Certified Neighborhood Council develop and commit to a written remedial action plan within 45 days from the date when the DONE mails a Fiscal Responsibility Admonition Letter imposing such a measure.
(c) Require that the Certified Neighborhood Council be placed on formal probation when the DONE determines that a Certified Neighborhood Council has been repeatedly deficient in its accounting practices or has consistently mishandled or misused its funds.

(d) Require that the Certified Neighborhood Council immediately relinquish all access to, and tender all control of, its business records and funds to the DONE. The DONE may impose this measure when it determines that the Certified Neighborhood Council has not complied with the corrective or remedial measures outlined in a previous Financial Admonition Letter, the prospect of rectifying the problem is unlikely, or the circumstances require immediate action to safeguard public funds.

(e) Refer the matter to the Commission with a recommendation that the Certified Neighborhood Council be involuntary decertified as set forth in section 22.810.1(e) (2) of the Los Angeles Administrative Code. DONE may recommend decertification when it determines that a Certified Neighborhood Council is incapable of handling its accounts, its Governing Body refuses to follow the advice, corrective action, or remedial measures outlined by the DONE, or the circumstances require immediate action to safeguard public funds.

(f) Refer the matter to the appropriate department, commission, or law enforcement agency when the Department has reasonable cause to believe that someone has engaged in unlawful or criminal activity involving a Certified Neighborhood Council’s public funds.

* Added 10/25/06 per Council Resolution
Article XI *

Neighborhood Purposes Grant Program

Neighborhood councils that desire to make a grant of their public funds to a nonprofit corporation (excluding religious institutions) organized under 26 United States Code (U.S.C.) section 501(c)(3) or to a public school, as authorized by Los Angeles Administrative Code sections 22.801(p) and 22.817, may make a final grant prior to making a final grant commitment and disburse funds to any grantee upon completion of the following:

1. Governing Body Approval

Any grant contemplated by a Certified Neighborhood Council shall be approved by action of the Certified Neighborhood Council’s Governing Body and shall be reflected in a written motion or resolution adopted by that body containing, in substance, the following details:

(a) The precise legal name of the recipient or grantee.

(b) The dollar amount of the grant.

(c) A description of the public purpose served by the grant.

2. Administrative Processing

After a Certified Neighborhood Council has approved a grant, evidenced by a written motion or resolution, a member of the Governing Body shall submit the following to DONE’s administrative office within 45 days:

(a) A written motion or resolution adopted by the Governing Body evidencing the body’s intention to make a grant.

(b) A Neighborhood Purposes Grant Program Application, as prescribed by DONE, which contains the information set forth in Section 1(a)-(c), above.

(c) Any additional information requested by DONE for it to evaluate the terms and legality of the proposed grant and a written grant agreement pursuant to the City’s contracting procedures.

3. Grant Application Evaluation

After receiving the Neighborhood Purposes Grant Program Application and documentation as set forth in Section 2 above, DONE shall forthwith evaluate the Certified Neighborhood Council’s proposed grant to determine as follows:

(a) Whether the proposed award or grant is being made to a nonprofit organization (excluding religious institutions) organized under 26 U.S.C. section 501(c)(3), or to a public school.
(b) Whether the proposed grant is for an identifiable public purpose, is consistent with the allowable expenditures under the Neighborhood Council Funding Program, and comports with all laws.

4. Grant Application Determination

(a) A decision by DONE to approve or deny a Certified Neighborhood Council’s proposed grant is final.

(b) DONE shall keep a record of all grants and, on behalf of the Certified Neighborhood Councils, prepare written contracts for all grants exceeding five thousand dollars ($5,000).

(c) The Commission shall approve all proposed grant contracts that exceed ($20,000) twenty-thousand dollars.

(d) Each grant application approved by DONE shall be treated as a separate neighborhood purposes grant.

(e) DONE shall ensure that the grant application process is transparent and that the identity of each grantee is retained and posted on the DONE website.

*Added 08/06/08 per Council Resolution