

Comments on Chapter 28 The Department of Neighborhood Empowerment

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Our research group has reviewed the proposed Chapter 28, which establishes the Department of Neighborhood Empowerment (DNE) and procedures for developing the Neighborhood Council Plan. Our comments, below, are supported by our study of research regarding participation in other cities, as well as our ongoing field research regarding neighborhood voluntarism in the City of Los Angeles. The specific comments express two themes regarding the factors for success in neighborhood participation:

- (1) Neighborhood councils should self-organize and self-govern at the local level. The City should provide support, but *not* unduly prescriptive, top-down planning requirements.
- (2) The City should support neighborhood participation by providing meaningful discretion with regard to resource allocation.

Service Facilitation May Divert and Overload DNE

Item (k) of Section 22.801, obliges the Department of Neighborhood Empowerment to “facilitate the delivery of City services to the neighborhoods as requested by neighborhood councils.” We recommend against requiring this administrative task of DNE.

Charging the Department with facilitating service delivery is an administrative function which we fear would divert the Department from supporting the valuable purposes of neighborhood involvement. Much of the scholarship on neighborhood participation suggest that the true value of neighborhood councils is in encouraging residents to pursue self-governance, to work together on joint problems, as well as to engage city policy making bodies on issues important to the neighborhood. Thus, it would seem appropriate for the primary goal of DNE to be to empower neighborhoods to work together on local problems, and be involved in city policy making. We fear that taking on a service delivery function would encourage neighborhood groups to see themselves as “clients” of the Department rather than actors on their own behalf.

Furthermore, delegating responsibility for service delivery to an intermediary agency invites opportunities for bureaucratic fragmentation. One danger is that residents would be further confused about accountability for service delivery (Department of Neighborhoods versus City Department versus City Council). Another issue is that residents will perceive City Council or Department of Neighborhood staff as evading responsibility in the event that they need to refer complaint to another agent.

Finally, from a purely practical standpoint, it seems doubtful that the Department would have adequate resources to effectively mediate service delivery complaints. Requiring the Department to perform this duty may overburden it and prevent it from facilitating self-organization at the neighborhood level. For these various reasons, we recommend that **Item (k) of Section 22.801** be dropped from the ordinance.

Coordinating Role is Excessive

For similar reasons, we recommend dropping or changing the language of **Item (l) of Section 22.801**. This item requires the Department to “help coordinate the relationships between existing and newly created advisory committees and neighborhood councils.”

This provision unnecessarily vests the Department with an ongoing responsibility for mediating organizational networks. While the Department should be responsible for *introducing* advisory committees and neighborhood councils to one another, *coordination* of the ensuing relationships is better left to the groups themselves. Given that the need to facilitate introductions would primarily be limited to an initial, start-up period, formalizing this duty within the ordinance seems excessive.

Were the item to remain in the ordinance, we recommend changing the language to read: “facilitate introductions between existing and newly created advisory committees and neighborhood councils.”

Language on Citywide Meetings is Confusing

We also have concern about the language regarding citywide meetings, in **Section 22.801, (e) and (o)**:

(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;

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

The description of these two DNE duties are confusing and ambiguous. Item (e) implies that the Department will facilitate meetings only upon request, while (o) appears to require semi-annual meetings. The items also confuse the issue of who will attend the meetings. Whereas (e) apparently requires all members of neighborhood councils to

attend, (o) suggests a smaller and more selective gathering of designated representatives from each council. Further, (e) is a bottom-up administrative approach that enables the councils to determine for themselves when they shall conference, in contrast with top-down style requirement contained in (o).

We suggest that these two items be rewritten and combined. to provide a clear understanding to the Department and neighborhood councils as to who can call city-wide meetings, how frequently, and who is invited and encouraged to participate. For example, replace (e) and (o) in the current form with:

(e) facilitate a citywide gathering (or "Congress") involving all members of neighborhood councils, when requested to do so by recognized neighborhood councils. In addition, the Department shall encourage and support meetings of the representatives of all neighborhood councils, on a semi-annual basis, or other schedule determined in consultation with the representatives of neighborhood councils.

Neighborhood Stakeholders, Not City, Should Designate Boundaries

We are concerned that the proposed ordinance is unduly directive with regard to the establishment of neighborhood council boundaries, and does not support the self-designation of boundaries by neighborhood stakeholders. Specifically:

- **Section 22.800** states in part, "The Department shall ensure that every part of the City is within the boundaries of a neighborhood council." It is our view that to require a plan that includes every area of the city may forestall local organization efforts. Complete inclusion of the City's neighborhoods in councils should be achieved over time and through the efforts of stakeholders coming together and participating, not through planning efforts conducted by the City and its agents. We suggest that this language be amended to read, "*The Department shall support local efforts to ensure that every part of the City has an opportunity to be included within a neighborhood council.*"
- **Item (a) of Section 22.809** states, "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." We have several concerns about this language:
 1. *This language seems to imply a "one size fits all" regulatory approach.* The planning process should support diverse efforts toward voluntary formation, not establish rigid citywide regulations. Any guidelines established by the City should be facilitative and oriented to ensure opportunities to participate by all neighborhood stakeholders rather than being formulaic in character.

2. *This language implies that there are existing, recognizable neighborhood boundaries that must be maintained.* To the contrary, we believe that neighborhood boundaries are subjective, shifting, and contested. It is important to understand that these boundaries will emerge from a process of organization and negotiation at the local level.
3. *Community planning district boundaries may be completely arbitrary from the perspective of neighborhood organization.* We recommend against language which appears to authorize the DNE to organize neighborhood councils within community planning districts.

In a city as diverse and geographically complex as Los Angeles, the success of neighborhood councils requires that boundaries be negotiated by neighborhood stakeholders and residents, not established through a top-down bureaucratic planning process. The City Council should avoid guidelines that limit the flexibility of local stakeholders as they self-organize into neighborhood councils. Centralized planning may inhibit the very important process by which neighborhood associations would come together voluntarily to form councils oriented toward their community, as they understand it.

Neighborhood Council Involvement in CDBG Budget

In their ground breaking study, Berry, Portney, and Thomson find that it is important to provide neighborhood councils meaningful input into resource allocation. They state "One of the most direct measures of the depth of a participation system is its ability to grapple realistically with the city budget." (64) They find that cities have had success in integrating neighborhood participation with capital budgeting. For example, Saint Paul, a "shining example" of participation, involves neighborhood councils in a Capital Improvement Budget Committee, which initiates all capital project proposals for the city. Berry et. al. state that "as much as 70 percent of the projects funded by the combined capital budgets are those originally initiated by the neighborhoods."

Such broad involvement in capital budgeting is clearly premature at this stage, especially given the scope of the work required to organize neighborhoods. Nonetheless, providing some scope for involvement in budgeting is sufficiently important to be addressed in the planning process. One promising option is to provide neighborhood councils input with regard to the allocation of Community Development Block Grant funding. This would have the advantage of improving the quality of community participation required under federal regulations, while providing neighborhood councils a voice in the allocation of capital resources. Consequently we recommend that the City Council amend Chapter 28 to require that the Department of Neighborhoods develop a plan, for submission to City Council, for providing neighborhood councils some budgetary input with regard to the Community Development Block Grant.