

**PARADOXES OF PARTICIPATION:
Implementing Neighborhood Governance Reform in Los
Angeles**

**Prepared for 'II Congreso de Participación'
November 16-17, 2005
Madrid, Spain**

Juliet Ann Musso
Associate Professor
School of Policy, Planning, and Development
University of Southern California

Introduction

In 1999 the City of Los Angeles undertook an ambitious new program to increase citizen participation in neighborhood governance. Following voter-approved reforms to the city charter, the City began implementing a citywide system of neighborhood councils designed to increase citizen participation and improve the city's responsiveness to its constituent communities. Now six years into implementation, the emergent system has made relative progress in the face of a variety of implementation challenges. Fewer than six months after a final plan for the system was put in place, virtually every part of the city was mobilized to form a council—a remarkable achievement given the size and diversity of Los Angeles, as well as the intensive voluntary effort required by citizens to develop these new governance structures. At the same time, the system is experiencing institutional growing pains, administrative controversies in some neighborhood councils, and difficulties incorporating neighborhood councils effectively in city governance processes.

The paper considers the implementation accomplishments and shortcomings of neighborhood governance reform in the City of Los Angeles. The paper argues that some of the obstacles facing implementation of the system paradoxically served to fuel the neighborhood council movement. The Los Angeles neighborhood council movement was rooted in citizen discontent with government, mobilized by government-led reform, and ultimately adopted by middle class homeowners as their own project. Without municipal backing, it is unlikely that citizen participation or local governance would have emerged as a public priority. Yet, without community ownership, implementation of the neighborhood council system would almost certainly have stalled. This suggests a push-pull model of implementation, in which implementation outcomes are the product of a politicized exchange between top-down and bottom-up forces.

The paper will first present an implementation framework that identifies the requisites of participatory governance in other American cities and incorporates key aspects of policy implementation theory, and in particular, Mazmanian and Sabatier's (1989) framework. Following that, the paper will consider the status of implementation in Los Angeles. The paper will conclude with implications for participatory reform in large cities.

An Implementation Framework for Neighborhood Governance

As the author elsewhere discusses, urban policy making has taken on a new cast with the evolution from government to governance that has occurred during the past quarter century. (Bogason and Musso, forthcoming; Musso, Weare, Oztas, and Loges, forthcoming.) Urban governance is inherently challenging due to the intractability of problems facing cities, institutional fragmentation, the increasing complexity and diversity of urban life, and the need to leverage both public and private resources within an inherently constrained fiscal environment. Within an urban setting, according to Gerry

Stoker (2004, 93), 'Governing becomes an interactive process because no single actor has the knowledge and resource capacity to tackle problems unilaterally.' Reinvigorated participatory institutions are becoming part of the complex networks of state, private, non-profit, and civil society actors.

The case of neighborhood council implementation in Los Angeles is an exceptional case of participatory reform within an urban setting. The importance of this case extends beyond city limits to the State of California and the nation. While a number of American cities have community or neighborhood councils, none of these have been implemented by charter in a city with the population, geographic scale, and diversity of Los Angeles. Thus, the neighborhood council system in Los Angeles presents an opportunity to understand the prospects of participation in a global city that has large numbers of recent immigrants, that lacks traditional civic spaces, and that is often stereotyped as devoid of neighborhood attachments.

Indeed Los Angeles has faced a number implementation challenges in putting into place the conditions required for success of neighborhood councils. In this section I first identify the key requisites argued to contribute to neighborhood governance in other American cities, and then turn to implementation theory to consider the factors likely to assist implementation.

Neighborhood councils exist in a number of American cities, as discussed in Berry, Portney and Thomson's (1993 *Rebirth of Urban Democracy*. As Berry, Portney and Thomson discuss (pp. 49-52), several factors contributed to the success of neighborhood governance in the five exemplar cities they studied:

- *Small, natural neighborhoods.* The councils were organized around small neighborhoods of around 2,000 to 5,000 in size on average, with the largest neighborhoods being in St. Paul, where they have an average size of 16,000 (p. 49). These small neighborhood groupings ensure that 'regular, face-to-face discussion of the issues was possible by all who would take the time to be involved.' (Id.)
- *A system conceived as citywide from inception.* Citywide coverage lacks only in San Antonio, where neighborhood organization emerged out of an Alinsky-type citizen action organization, Communities Organized for Public Service (COPS, p. 52).
- *Provision of political support, access, and resources from the inception.* 'Political innovations' (p. 50) such as information and communication systems and mechanisms for meaningful political involvement in issues such as planning or budgeting was central to success. 'The results of these innovations demonstrated the value of participation to citizens and government officials alike. (p. 50)

One of the central debates in the policy literature revolves around 'top-down' and 'bottom-up' approaches to explaining the success (and failures) of policy implementation. The top-down approach typically views implementation as a process that flows from an originating policy statute (Sabatier 1986), in which the chief problem is obtain-

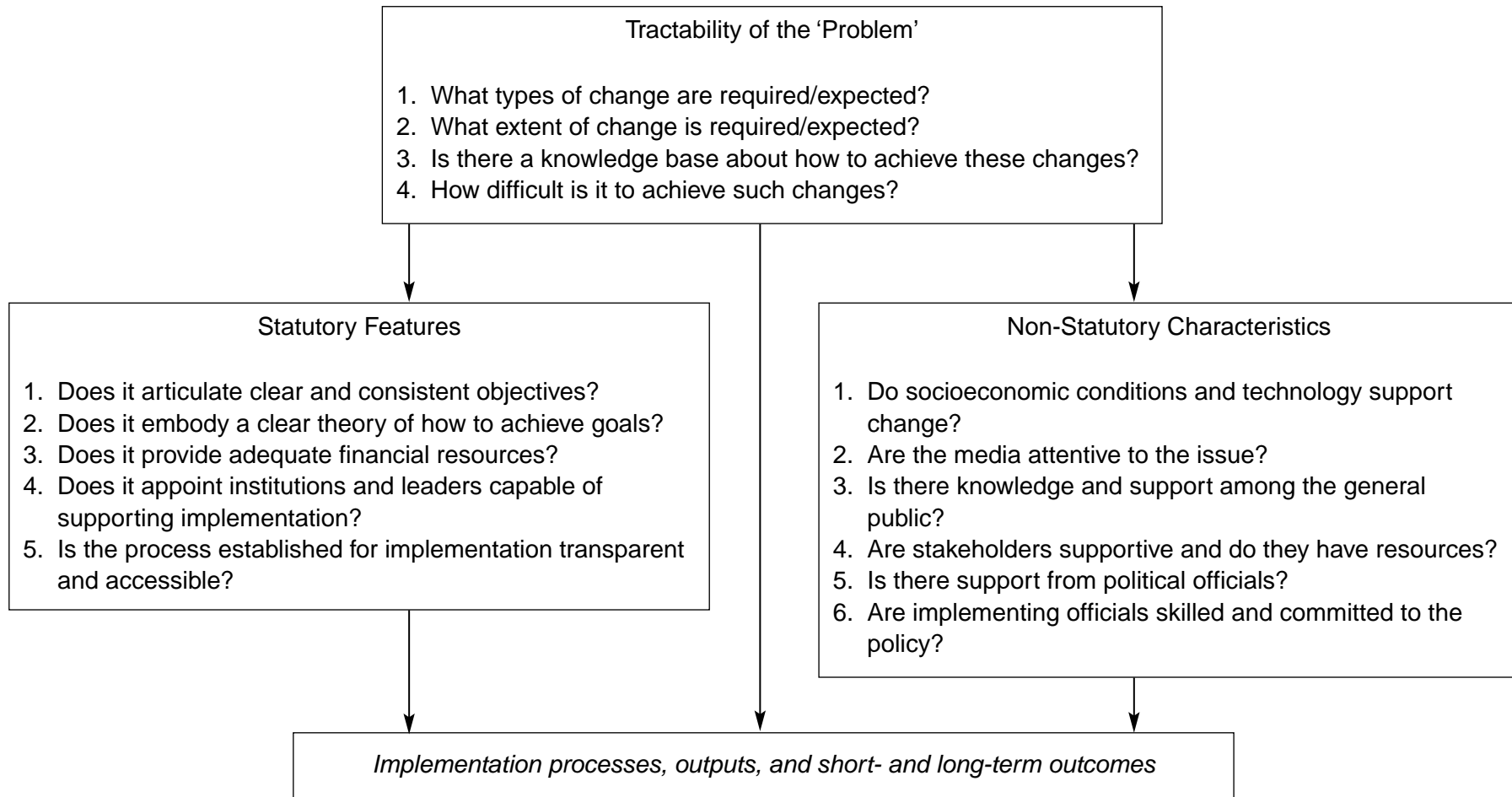
ing compliance from the operatives that do the actual work of implementation (Barrett and Fudge 1981). In this framework, policy makers seek to bound the behavior of bureaucrats and other target groups through legal levers and other features of the policy statute. Two of the leading proponents of the top-down theory are Sabatier and Mazmanian (1989), who have developed a widely recognized model of the requirements for implementation success.¹ As Figure 1 illustrates, characteristics that influence implementation include:

- *Tractability of the 'problem' or 'goal.'* Tractability refers to the extent to which technical solutions to implementation problems are available, whether the target population the policy seeks to influence is small in relative terms, and the extent to which the policy requires behavioral change among target groups.
- *Statutory features.* The characteristics of policy design include the extent to which goals are clear and consistent, whether the duties of implementing agencies and officials are clearly specified and can be enforced, and whether statutes provide adequate resources to support implementation.
- *Other 'non-statutory features.'* Factors that are outside the control of policy designers include the extent to which socioeconomic conditions and technology support implementation, the degree of knowledge and support from organized constituency groups and key legislators, and the skills and commitment of implementing officials.

By contrast, the bottom-up approach to policy implementation emphasizes the importance of policy networks, rather than statutory authority and central administrative control, in shaping implementation outcomes. Theories of bottom-up implementation focus on the goals, strategies, and behaviors of a wide range of actors, from bureaucrats working within administrative institutions at the street level and up (Bardach 1980; Levin and Ferman 1986; Brodtkin 1990), to networks of public and private officers administering the intended programs out in the field (Hjern and Porter 1981; Hjern 1982; Hjern and Hull 1982).

What is unique about this particular implementation story is that it addresses a structural reform to urban governance institutions, as opposed to the programmatic emphasis of much of the earlier implementation literature. Moreover, the charter reform was a result of both bottom up forces that advocated for secession, and a top-down response from appointed and elected commissions. The factors that mediate successful programmatic implementation may be quite different than those that influence institutional reform. Another unique aspect of this particular study is the length and depth of the research reported. The analysis is based on a multi-methodological, field-intensive study that spans a period of almost ten years, from 1996, just prior to the institution of the two charter commissions that drafted the charter reform, through the present, when the study team is evaluating system accomplishments six years into implementation.

Figure 1: Mazmanian and Sabatier's Implementation Framework²



Neighborhood Council Implementation

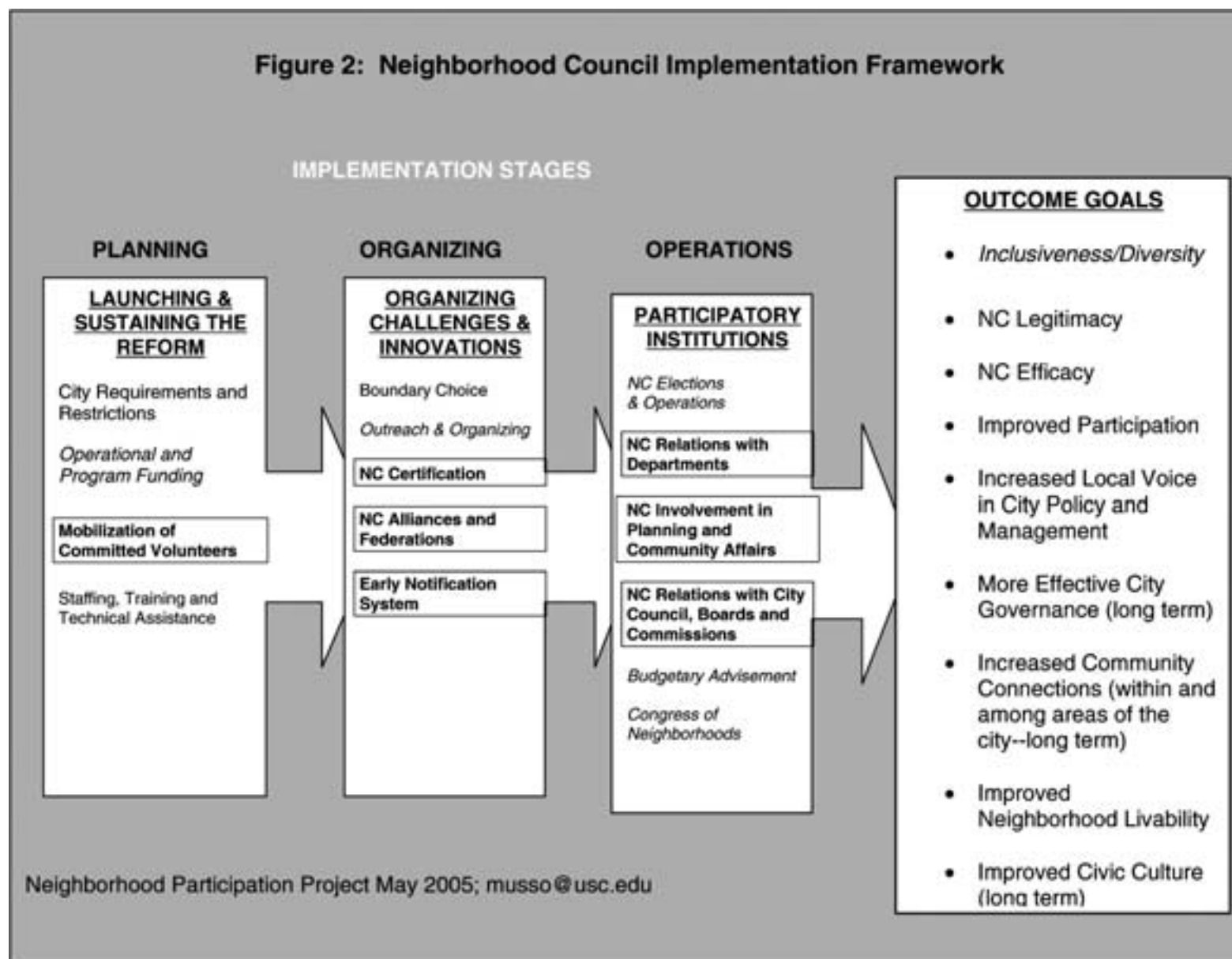
On June 8, 1999, voters in the City of Los Angeles approved a charter reform measure that included a provision requiring creation of a citywide system of neighborhood councils. The charter requires that these councils represent all stakeholders within a neighborhood, and defines stakeholders as those who live, work, or own property in the neighborhood. While the neighborhood councils have no formal powers, the charter contains several provisions expected to improve neighborhood participation in the city policymaking process, including creation of an 'Early Warning System' to support information to and feedback from neighborhood councils.

Figure 2 illustrates a conceptualization of the implementation stages of neighborhood councils, which included the planning process, the organizing process, and the development of institutions to sustain participation in the system. The key accomplishments of each stage are shown in bold font within outlined boxes, while areas where the system lacked are presented in italics.

Planning Process: Launching and Sustaining the Reform. The 1999 charter reform authorized a Department of Neighborhood Empowerment (DONE), and set into motion a two-year planning process. The first stage of planning entailed a series of 16 'regional planning workshops' in which community participants were asked how the councils should be organized, how boundaries should be defined, and how to ensure that neighborhood councils represent the diversity of stakeholders in the neighborhood. The draft plan that ensued was then disseminated to the public in a series of 16 weekend and evening community hearings, each generally preceded by 'learning sessions,' during which the public had an opportunity to engage in discussion around the plan with DONE staff. In spring 2001 the City Council's Government Efficiency Committee initiated revisions by staff, and held three additional community hearings. The City Council adopted the final plan May, 2001, and communities were permitted to submit applications for certification beginning October 1, 2001.

During this period, the central tension involved whether to standardize policies or to allow community autonomy. This was largely decided in favor of local determination of boundaries, by-laws, and operating procedures. At the same time, relatively few resources were committed to the system. There was limited investment in neighborhood council organizing, operations, or reforms to support their deliberative involvement in the governance process. While sustained community involvement in the planning process indicated that the planning process was mobilizing committed volunteers, a lack of attention to targeted organizing placed at risk the system's ability to represent particular community stakeholders, and in particular, lower income individuals, renters, and recent immigrants.

Figure 2: Neighborhood Council Implementation Framework



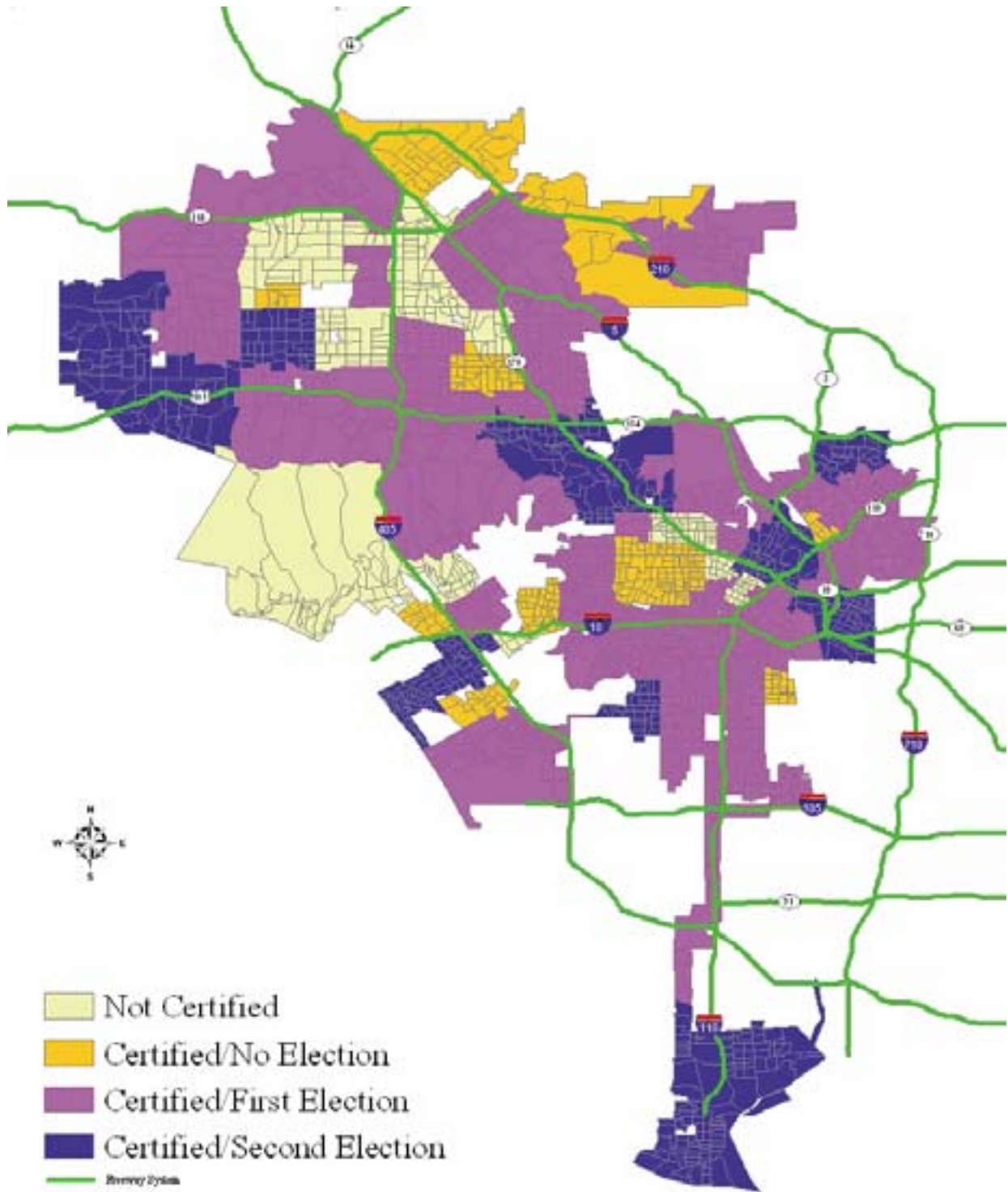
Organizing Challenges and Innovations. Following submission of the plan to the City Council in December of 2000, the DONE turned attention to assisting organizational activity throughout the City. Project coordinators provided technical assistance and worked to identify areas of the City that did not have active organizing efforts underway. The DONE held workshops throughout the City to provide training regarding organizing and certification.

By 2004 81 neighborhood councils were certified; among certified neighborhood councils, 74 had elected governing boards. As Map 1 illustrates, these neighborhood councils span the city, although there are still gaps in areas of the Westside and the Valley. The ability of communities to self-organize across the City suggests that Los Angeles had significant reserves of untapped civic volunteerism and strong community desire for self-determination. At the same time, self-organization combined with political/economic self-interest appeared to support cohesion of relatively affluent areas (Kitsuse et al. 2002, 2), placing at a relative disadvantage communities with more limited resources.

Moreover, there is evidence that the system is not attaining the goals expressed in the charter of representing the diversity of stakeholders in the City. Research on political participation suggests that poorer individuals are less likely to participate in traditional avenues for participation, such as voting and contacting political officials (Verba et. al.; Berry, Portney and Thomson). Los Angeles neighborhood councils do not overcome these long standing participation gaps, as they tend to attract individuals who have long tenure within the community. Consequently they tend to over-represent social elites and do a particularly poor job of representing Latinos, renters, and people who do not speak English as their first language.

The difficulty of ensuring diversity may in part relate to the structure of neighborhood council by-laws. A content analysis of 56 neighborhood council bylaws suggests that most created hierarchical representative structures with meeting norms that allow limited opportunity for community deliberation. For example, although neighborhood councils do typically meet on evenings, the meetings function much like city council meetings, in many cases limiting stakeholder involvement to two-minute comments at the end of the meeting. This organization may make the system less penetrable to stakeholders, and thus inhibit stakeholder deliberation in developing positions on community issues.

Map Certification and Election Status as of 2004



Operations: Developing Participatory Institutions. The City's success in developing the participatory institutions necessary to a sustainable system has varied. While the City has not fully implemented an early notification system as envisioned by Charter reformers, the City has succeeded in putting all agendas on line, and has also created electronic dissemination of the 72 hour notice required by California open meeting act requirements (Musso and Weare, 2005). The City has failed to institutionalize other political innovations, such as a Congress of Neighborhoods and involvement of NCs in monitoring of city service delivery. The involvement of NCs in budgetary processes is tokenistic at best (see Musso et. al, 2005). In terms of neighborhood council accomplishments the experience is also mixed. A number of neighborhood councils are demonstrating community-level accomplishments in such areas as advising on land use policy, facilitating service delivery, and supporting community events such as neighborhood beautification projects and youth activities. Others continue to struggle with procedural problems, personality conflicts, or lack of strategic direction.

The most important vulnerability of the system has to do with the representative legitimacy of neighborhood councils. Allowing self-determination of electoral procedures did not produce reasonable standards on such issues as qualifications, outreach requirements, absentee balloting, administration and dispute arbitration. While most neighborhood council elections are non-controversial, there continue to be high-profile electoral challenges that, if not resolved, would appear to place the democratic legitimacy of the system at risk.

A hope for the system is that it would improve the City's civic culture by facilitating social network formation and generating 'social capital' (the attitudes of trust, tolerance, and generalized reciprocity that support collective action). While as noted above neighborhood councils did not fully reflect the diversity of Los Angeles, they did include board members from different stakeholder groups and political persuasions. Thus they appeared to provide better forums for political cross-talk than would traditional homeowner associations, which tend to be extremely homogenous and to discourage political disagreement (Hibbing and Theiss-Morse, 2002). At the same time board members appeared more likely to talk to stakeholders with whom they were similar, reinforcing the need to ensure broadly representative boards.

Early survey results suggest that the more effective neighborhood councils had strong 'bridging' networks connecting them to other neighborhood councils, city officials and community stakeholders. In contrast, strong 'bonding' networks (those that connect people *within* neighborhood councils) appeared to *decrease* performance, possibly due to excessive insularity (Oztas 2004).

Analysis: Paradoxes of Participation

This section considers how the obstacles and resources confronting neighborhood council implementation in Los Angeles shaped the development of the system. It is re-

markable to note that the system development has proceeded, albeit haltingly at times, despite an array of implementation challenges that include ambiguous policy goals and directives, variable political support, limited resource commitment and an administrative culture hostile to public participation. While the obstacles facing the system paradoxically may have fueled neighborhood council self-organization, they also have had resultants with respect to the shape the system now appears to take.

Goal Ambiguity and the Tension between Self-Determination and Standards.

The multi-textured politics of charter reform contributed to poorly focused formal objectives. A catalyzing event for charter reform was the threatened secession of the San Fernando Valley, and the politics of reform tended to pit homeowner activists against the organized development lobby. Advocates of community self-determination sought power over land use and limited regulation, while City hall insiders, the large Chambers of Commerce, and developers sought to limit neighborhood council authority. Not surprisingly the Charter contained vague objectives and few institutional details. The vague language in the Charter, which was not clarified in implementing ordinances, supports varying interpretation of roles and requirements.

For example, there has been enduring difference of vision between City officials and many grassroots constituents regarding the role of neighborhood councils. The goals expressed by several implementing officials tended to emphasize self-governance, for example:

‘I’d like people to stop looking outside of themselves for answers to their problems and I’d like people to start assuming responsibility for participating with their neighbors and their city government in solving problems.... Empowerment truly means that you take responsibility for yourself...’

In contrast, many neighborhood council organizers articulated a desire for political influence, and expressed resistance to self-governance on the grounds that it represented an ‘offload’ of maintenance duties to neighborhood councils. A neighborhood organizer stated, ‘We don’t want to do the city’s job for free... like a self-service gas station.’ Another argued, ‘Neighborhood councils should not be the maid with the vacuum cleaner but the mother-in-law with the white gloves.’ These differences of vision—direct political influence and oversight versus self-governance—have characterized all stages of the process.

The vague Charter language left resolution of administrative details subject to City ordinance and administrative discretion. In turn, this meant that neighborhood council implementation was particularly vulnerable to non-statutory factors: political and administrative attitudes, fiscal resources, and stakeholder interest.

Lack of Firm Political and Administrative Support. Mazmanian and Sabatier (1989) emphasize the importance of political support and administrative leadership to program success. The goal ambiguity in the Charter made particularly important the process of

developing consensus regarding neighborhood councils during the planning stage. What is interesting about neighborhood council implementation in Los Angeles is that it has generally been a project of the grass roots, and has proceeded through self-organization in the face of what at best has been tokenistic political support. Paradoxically, it the perceived political failings of the City, in combination with the open character of the reform, appeared to encourage rather than retard grassroots assumption of the neighborhood council project. As we elsewhere argue, 'Every act on the part of the City that appeared to undermine the goal of self-determination—the inept handling of the planning process, the tepid support for neighborhood councils within City Council, the lack of operational funding for neighborhood outreach and organizing—has further fueled solidarity in adversity.' (Kitsuse and Musso, 2004?)

During what stretched into a two-year planning stage, few of the ambiguities described above were resolved, in no small part due to a lack of political championship and weak administration. There was sharp antagonism between then-Mayor Riordan and City Council, a rift that had predated charter reform and continued until the elections of 2001, which replaced the Mayor and a majority of City Council members.³ In appointing the first General Manager of the Department of Neighborhood Empowerment (DONE), a new agency responsible for implementing and overseeing the system, the Mayor selected an inexperienced field deputy rather than Greg Nelson, a City Council insider who had provided leadership and expertise regarding neighborhood councils during charter reform. Planning unfolded with limited resources, in an information vacuum, and surrounded by communication problems and administrative turnover.⁴

Although the planning process entailed an almost unprecedented number of public meetings, these 'workshops' were poorly structured and did not promote meaningful deliberation by educating people regarding the role of neighborhood councils, options for structuring them, and administrative constraints. There was significant discrepancy between the goals for the workshops – 'listening, hearing, dialoging' – and the ensuing discussion, which involved the use of sticky notes to gather individual comments on a wide array of issues. The participants, with varied knowledge of the issue, and no information regarding administrative constraints, created an unmanageable array of options and no weight of judgment regarding the preferred design of the neighborhood council system. The process fed cynicism about the City's commitment to neighborhood participation, as expressed in the widely circulating joke that the Plan was a 'DONE deal.' A member of the Valley business community who participated in the planning workshops characterized them as 'an exercise in wasting time and sticky notes.'

The result of a two-year planning process was a set of general procedural requirements that left to self-design most of the substantive aspects of neighborhood council structure, and provided virtually no guidelines regarding the subsequent function of neighborhood councils, much less the institutional processes that would link these new entities to City governance processes. Ironically, the most important substantive stan-

dards were not established by City ordinance, but involved state standards found to apply by City Attorney James Hahn, who would succeed Mayor Richard Riordan as mayor. For example, Hahn found that neighborhood councils were city entities, which made their boards subject to state ethics and disclosure laws, and their deliberations subject to state open meeting and notification provisions.

The election of a new Mayor, James Hahn, coincided with completion of the planning process, and the new mayor made neighborhood governance a cornerstone of his political platform. He appointed Greg Nelson as General Manager and the DONE focused its small field staff on support of neighborhood council certification. The same election replaced several City Council members with neighborhood-friendly representatives. Ironically, the election of more sympathetic political leadership coincided with a state fiscal crisis that severely reduced the financial health of Los Angeles and resulted in a two-year hiring freeze. Although political support did not translate into substantially increased financial resources to the system, the resurgence of political attention and informed administrative leadership re-energized the system at the onset of neighborhood council certification. During James Hahn's single term as Mayor, 86 neighborhood councils completed the certification process. At the same time, other neighborhood oriented initiatives floundered as the Hahn administration encountered charges of financial and political impropriety.

In June 2005, Hahn was defeated by City Council member Antonio Villaraigosa, who ran on a platform that emphasized regional reform of education, housing affordability, and mass transit investment. While it is too early to determine how this change of political leadership will affect neighborhood council development, it is fair to say that neighborhood councils, with their heavy involvement of homeowners and emphasis on local development policies, were not a focus of the Villaraigosa mayoral campaign, and nor has he focused any mayoral attention on neighborhood council policies during the first several months of his term.

Stakeholder Support and Resources. In the absence of firm political support, and without many directives in the charter, stakeholder support has been a crucial factor in the implementation of neighborhood governance reform in Los Angeles. While the planning process described above did little to clarify purposes or standards for the system, it did have the effect of mobilizing stakeholder interest, and it has been sustained involvement of neighborhood organizers that has kept the system moving forward. Voluntarism sustained the self-organizing process, and has also resulted in the development of various regional and policy networks of neighborhood councils throughout the City. These include the Citywide Alliance of Neighborhood Councils, the Valley, Harbor, and Northeast Alliances, a City Issues Network, and a network of gay and lesbian neighborhood council representatives.

The role of the grassroots in supporting the system would appear to have two particularly important implications for the emergent system. The first is that with little Citywide political support for administrative reform, the institutions for involvement are de-

veloping in a halting and uncoordinated fashion. For example budgetary involvement, which has been a centerpiece of neighborhood involvement in some cities, has been largely tokenistic because there is not strong interest in the process among neighborhood council, while the Mayor's finance office has not demonstrated support for or understanding of the role neighborhoods might play in resource allocation. Nor has the City made any progress in developing a Congress of Neighborhoods to involve neighborhood councils in structured deliberation of citywide issues. The primary orientation of neighborhood councils to date appears to involve involvement in community development and review of land use decisions at the local level.

Because the city is not institutionalizing neighborhood council involvement in policy making or service delivery, it would appear to be missing an opportunity to make city governance more informed about community concerns and more dialogic. Rather, the main effect of the system will likely be to increase the reactivity of communities to City policy making, due to the development of new political networks both within the community and across the City. In other words, rather than more deliberative and structured involvement in policy making, it is likely that the system will create a sort of accelerated pluralism as a result of increased information and political coalitions that result from neighborhood council networking.

A second implication is that the efficacy of the system varies across the City, and appears to relate heavily to local community capacity. Neighborhood councils are functioning best in neighborhoods that have residents with higher incomes and educational levels, or in lower income areas that have a strong pre-existing network of collaborative community organizations. Communities that have lower income residential populations, fewer pre-existing community associations, and/or a history of political conflict are struggling for direction, and many of these are encountering controversies related to elections, finances, or compliance with City regulations related to disclosure and open meetings. The unfortunate result of the self-organizing character of the system is limited governing capacity in the communities that would appear to need it most. Moreover, to the extent that the system reform heightens pluralistic political pressures throughout the City, it is likely also to intensify the class biases already present in the political system.

References

- Bardach, Eugene. 1980. On designing implementable programs, Ch. 9 in Majone and Quade, Eds. *Pitfalls of Analysis*, NY: Wiley.
- Barrett, Susan and C. Fudge. 1981. *Policy and Action*, London: Meuthen.
- Berry, Jeffrey M., Kent E. Portney, and Ken Thomson. 1993. *The Rebirth of Urban Democracy*. Washington, D.C.: The Brookings Institution.
- Bogason, Peter and Juliet Musso. Forthcoming. Democratic network governance. *American Review of Public Administration*, March 2006.
- Brodkin, E.Z. 1990. Implementation as Policy Politics. In *Implementation and the policy process: Opening up the black box*, edited by D. J. Palumbo and D. J. Calista, 107-118. New York: Greenwood.
- Hibbing and Theiss-Morse, *Stealth Democracy*, Cambridge University Press, 2002.
- Hjern, Benny, and David O. Porter 1982. Implementation Structures: A New Unit for Administrative Analysis. *Organization Studies* 2: 211-37.
- Hjern, Benny 1982, 'Implementation Research: The Link Gone Missing,' *Journal of Public Policy* 2(3) 301-8.
- Kitsuse, Alicia, Christina Polyzoides and Tridib Banrjee. 2002. On common grounds: Neighborhood councils and territorial choice in Los Angeles,' Neighborhood Participation Project Working Paper. Los Angeles: School of Policy, Planning, and Development, University of Southern California.
- Levin and Ferman 1986. The political hand: Policy implementation and youth employment programs, *Journal of Policy Analysis and Management*.
- Mazmanian, Daniel, and Paul Sabatier. 1989. *Implementation and Public Policy*. University Press of America.
- Musso, Juliet and Christopher Weare. 2005. Implementing early notification in Los Angeles: Citizen participation politics by other means. *International Journal of Public Administration* 28,7-8: 599 – 620, July 2005.
- Juliet Musso, Mark Elliot, Christopher Weare, and Michael Sithole, 'Implementing Participatory Budgeting: The Case of Neighborhood Councils in Los Angeles,' presented at the Public Management Research Conference, 2005.

Juliet Musso, Christopher Weare, Nail Oztas, and Bill Loges. Forthcoming. Neighborhood governance reform and networks of community power in Los Angeles,' *American Review of Public Administration*, March 2006.

Oztas, N. 2004. *Neighborhood Network Structure of Social Capital: a Multilevel Analysis of the Los Angeles Experiment*, unpublished thesis, University of Southern California.

Sabatier, P.A. and D. Mazmanian. 1979. 'The Conditions of Effective Implementation,' *Policy Analysis* 5: 481-504

Stoker, G. 2004. *Transforming Local Governance*; Basingstoke: Macmillan Palgrave: 93.

¹ Mazmanian, Daniel, and Paul Sabatier. 1989. *Implementation and Public Policy*. University Press of America. Also see Sabatier, P.A. and D. Mazmanian. 1979. 'The Conditions of Effective Implementation,' *Policy Analysis* 5: 481-504, and Eugene Bardach, 'On Designing Implementable Programs,' Ch. 9 in Majone and Quade, *Pitfalls of Analysis*, NY: Wiley, 1980.

² Adapted from Mazmanian and Sabatier (1989) and Sabatier (1986, pp. 23-25).

³ Interviews with respondent 21, 8-21-00, respondent #30, 8/9/00; respondent #27, 9/7/00.

⁴ Minutes, Board of Neighborhood Commissioners Retreat.