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Commission@EmpowerLA.org

TELEPHONE: (213) 978-1551

ERIC GARCETTI
MAYOR

EMPOWER LA™
Department of
NEIGHBORHOOD EMPOWERMENT

20TH FLOOR, CITY HALL
200 NORTH SPRING STREET
LOS ANGELES, CA 90012

TELEPHONE: (213) 978-1551
TOLL-FREE: 3-1-1
FAX: (213) 978-1751
E-MAIL: EmpowerLA@lacity.org

GRAYCE LIU
GENERAL MANAGER

www.EmpowerLA.org

January 19, 2018

Honorable David E. Ryu, Chair
Health, Education, and Neighborhood Council Committee
Councilmember, Fourth District
Los Angeles City Hall
200 N Spring Street, Room 425
Los Angeles, CA 90012

SUBJECT: REPORT BACK ON COUNCIL FILE 15-1022-S2 REGARDING THE NEIGHBORHOOD COUNCIL SUBDIVISION ONLINE VOTING

Honorable Committee Chair Ryu:

SUMMARY

On March 24, 2017, the City Council approved online voting for the Skid Row Neighborhood Council subdivision election on April 6, 2017 with a request on the report back of recapping the experience with any recommendations. Within 4 days, the Department of Neighborhood Empowerment (Department) working with the online vendor, Everyone Counts (E1C), opened online voter registration for the subdivision election for stakeholders of the Downtown Los Angeles Neighborhood Council (DLANC) and Historic Cultural Neighborhood Council (HCNC). In addition, the Department contacted the registered voters from the 2016 Neighborhood Council elections for both DLANC and HCNC to notify them of the opportunity to vote online for the subdivision.

Despite the short time frame to register voters before the election and complications with turning around voter approvals, the online voting for the subdivision was successful with a total of 1,388 votes of which 1,186 were cast via online voting. The Department has detailed the process, including mistakes, lessons learned and recommendations in Attachment A. Because of this success, the Department requests online voting for any subdivision elections in 2018 to allow for further perfecting of the online voting platform to prepare for possible use in the 2019 Neighborhood Council elections.

The Department has received four applications for subdivision after the application period closed on January 15, 2018. They are as follows:
1. North Westwood Neighborhood Council from Westwood Neighborhood Council
2. North Historic Cultural Neighborhood Council from Historic Cultural Neighborhood Council

3. Little Bangladesh Neighborhood Council from Wilshire Center Koreatown Neighborhood Council and Rampart Village Neighborhood Council
4. Laurel Grove Neighborhood Council from NoHo Neighborhood Council and Greater Valley Glen Council.

If all of these applications were to move to the election phase, only Historic Cultural Neighborhood Council has had online voting in the past. The Department believes that online voting and voter registration are crucial in providing additional ways to engage stakeholders in the subdivision elections so registering and voting online should be offered to the other Neighborhood Councils as well.

In reviewing the subdivision applications, the Department will incorporate the Board of Neighborhood Commissioners' recommendations for changing the subdivision Ordinance Sec 22.819 of the Los Angeles Administrative Code. See Attachment B. These recommendations are an improvement to the current subdivision regulations by allowing the Board of Neighborhood Commissioners to be a part of the subdivision approval process and increasing outreach about the subdivision. The Department anticipates any subdivision elections to begin no earlier than late April and to finish by July 1, 2018.

RECOMMENDATIONS

1. INSTRUCT and AUTHORIZE the Department of Neighborhood Empowerment and the Office of the City Clerk to enable the online voting platform for the 2018 Neighborhood Council subdivision elections.

2. REQUEST the Office of the City Attorney to make changes to Los Angeles Administrative Code Section 22.819 to incorporate the recommendations of the Board of Neighborhood Commissioners November 7, 2017 letter regarding Neighborhood Council Subdivisions.

FISCAL IMPACT

There is no additional fiscal impact to the General Fund as the Department will utilize funding in its current fiscal year budget to conduct subdivision outreach and elections.

I am available to answer any other questions you may have on this matter.

Sincerely,

Grayce Liu
General Manager

Skid Row Neighborhood Council Subdivision Online Voting Report

<u>Overview</u>

City Council approved the use of online voting on Friday, March 24, 2017. Online voter registration was opened on the EmpowerLA website on Tuesday, March 28, 2017, at 7 pm, which was one day after the Department of Neighborhood Empowerment's initial estimate. The online voter registration portal closed on Saturday evening at 10:00 pm Mountain Time and was reopened at 10: 52 Mountain Time. The registration was open, but the landing page was accidentally scheduled to close with the incorrect date and time.

The Skid Row Neighborhood Council subdivision election was conducted in accordance with the election procedures of the councils that were proposed for subdivision: Downtown Los Angeles Neighborhood Council (DLANC) and Historic Cultural Neighborhood Council (HCNC). Both councils conducted their 2016 elections as documentation elections with online voting and a minimum age of 16 for DLANC and 15 for HCNC. In compliance with the citywide policy, the homeless were able to self-affirm their identity and stakeholder status.

There were six Pop-Up Polls (PUP) that took place in different neighborhoods on:
- Wednesday, March 29, 2017
- Thursday, March 30, 2017
- Friday, March 31, 2017
- Monday, April 3, 2017
- Tuesday, April 4, 2017
- Wednesday, April 5, 2017

In addition, voters could visit the EmpowerLA office on those days and vote online between the hours of 1pm and 4pm.

Voters who visited a Pop-Up Poll, in the field or at City Hall, registered to vote by offering their documentation to the staff that verified their identity and their stakeholder status. Once verified, they were given their credentials (username and pin) and were able to vote on a tablet. Staff kept the registration form but did not copy or keep the documentation.

Voters who registered online were prompted to upload their documentation verifying their identity and their stakeholder status. The data went to Everyone Counts (E1C), which batched the data and uploaded it to a secure FTP site each morning so that Department staff could review the documents and verify the voters. The documents were deleted after review and at the end of the day, a file was sent to E1C so that credentials could be sent to the voters.

There were six files of online registrations sent to Department and six files of verifications sent to E1C for credentials and the process was audited for accuracy.

Voters who registered online but did not include appropriate documentation were sent an email directing them to visit a PUP or the polling location on Election Day. The short timeline did not

allow for back and forth exchanges in order to verify voters. There were 303 voters who registered online, but did not receive credentials due to deficient documentation.

Overall:
- 1095 voters from the 2016 elections for DLANC and HCNC were sent credentials
- 1886 voters registered online, either at home, at a Pop Up Poll, or at the Polls
- 83% of the voters who registered were verified and sent credentials
- 60% of the voters with credentials used them to vote

On election day at the Polling location, there were greeters outside the building with clipboards, pens, and registration forms so that all voters were ready to register when they reached the entrance. There were three verification tables for voters: one for those with identification and documentation, one for identification and registration tables, and one for voters with identification and who were on a roster. There was a fourth table for homeless who were self-affirming their identity and stakeholder status.

Those voters at the first two tables, once verified, would go to one of six credential stations where their data was entered into a tablet, checking their data points (first name, last name, DOB) to ensure that they weren't already registered, hadn't already receives credentials, and hadn't already voted.

Voters with credentials then voted in a voting booth on a tablet. Homeless voters registered on paper and were given a paper ballot. They voted in a voting booth and then deposited their ballot in a ballot box next to the exit.

Issues and Recommendations

There were three mistakes that took place with the registration, verification, and credentialing process:

Error #1: The Department sent E1C two files with voter data from the 2016 elections for DLANC and for HCNC. Each file had two tabs for a total of four data sets. E1C opened both files and captured the data from the top tabs but missed the second tab on each file. The Department emailed all voters to let them know their credentials were coming and received some bounces. E1C emailed the credentials and received a small number of bounces. The error was discovered when the Department attempted to reconcile the difference in bounces, noticing then that the tabs were the issue.
Remedy: Data transfer should be discussed in advance and protocols established. In this case the data was not refined or organized. Future data sets should have established fields and agreed upon formatting.

Error #2: The Department received incoming files of online registrations and supporting documents on a daily basis. The files were uploaded to an FTP site and were downloaded and then processed, resulting in files of verified voters that were sent back to E1C. The files were named with a date and when the 4/2/17 file was completed, staff closed up shop because voter registration closed on 4/2/17. The assumption was that

the 3/29 file was a combination of two days, the 28th and 29th, resulting in a total of five files. In actuality there were six, one for each day starting with 3/29/17 and ending with 4/3/17. On the 4th, an audit revealed the missing file which was quickly verified.
Remedy: Data transfer should have a notification mechanism so that there are no assumptions. In addition, naming protocols should be established so that both teams can quickly locate, sort, and share files.

Error #3: The Department verified voters during the day and emailed the resulting voter data to E1C, without notifications, and on Friday the 31st, the voter registration date for the 30th was processed and emailed. The next week, it was noticed that the complaints over missing credentials were predominantly from the 30th which prompted an audit and the missing file was located in an unopened email.
Remedy: Establish a process that eliminates the transfer of files and allows for a shared process for incoming registrations, for verification, and for audits so that the need to exchange flat files ended.

In general, a way to cross check information with E1C must be established. The elections team can only track voters when they have all of the information available to them. As an example, when staff receives an email asking for a username and pin, they can only know that it was sent.

Documentation

The Skid Row Neighborhood Council subdivision elections was a documentation election and the daily files from E1C included the documents that were uploaded during the registration process. The documents were in chronological order and were deleted when the verification process was completed.

Trouble understanding the paperwork requirements for documentation elections is the #1 reason for failed voter registrations.

In the Skid Row election, 698 new voters attempted to register remotely, using the online Voter Registration Portal from their personal smartphone, computer or tablet. Of this group, there were 382 successful registrations, and 316 unsuccessful registrations in which the voter could not be verified - a failure rate of 45%.

Almost without exception these voters could not be verified because of documentation issues. If nearly half the voters cannot successfully navigate the documentation registration process, this is a strong argument against documentation requirements altogether.

Recommendation

As long as documentation is allowed in NC elections, it is vital to provide better guidance to the voter trying to navigate registration from home on their computer or smartphone. One solution would be to create a Documentation Chooser that guides a person through selecting the correct documentation for their specific situation. This could be done as both an online app that links to

the registration page, and as a printed flowchart that could be posted at polling locations. The voter could begin by selecting whether they are Live/Work/Own/Community Interest, and then move through successive stages to choose the document(s) they need to submit.

Currently, even though the Department is offering links to document lists, voters are either not using them at all, or not using them right. This may be because the lists are too bewildering to be useful as they present a lot of extraneous info not pertinent to a specific individual's situation, or it may be because voters erroneously believe they have done things correctly already, and don't bother to review the documentation lists. For example, a common mistake was entering a business address without uploading a document like a business card to substantiate the individual's tie to that business.

If the registration process was set up so that it was mandatory to pass through this document selection process, the rate of successful registrations would skyrocket.

Rosters

There were 26 rosters with 4090 names, submitted by employers and organizations so that their employees, members, and volunteers could vote. The process for assembling and submitting rosters was addressed at the public meetings, online, and in emails to those who requested assistance with the documentation process.

One organization, the Democratic Socialists of America (DSA), declined the opportunity to submit a roster and instead sent an email to its membership, giving them instructions on how to register online and how to qualify to vote. DSA members uploaded a screenshot of their emailed instructions and then gave 801 East 4th Place as their qualifying address. Unfortunately, this amounted to self-affirmation for the voter's stakeholder status since the voter did not offer any documentation that the DSA had an address where they met or conducted their business.

The Election Team's verification staff searched the internet for any evidence that the DSA was active within the DLANC/HCNC/SRNC boundaries but found nothing. There were twenty DSA members that registered online, they all received emails informing them that they would need to bring their documentation to a Pop Up Poll or to the polling location on Election Day.

The leadership of the DSA protested and the ELA staff explained that entering an address on the registration form did not constitute documentation that the organization had "an ongoing and significant" participation within the community and that it was incumbent on the organization to provide an address and a membership roster so that the staff could use that to verify voters.

The DSA subsequently sent an agenda for a meeting that took place on March 18, 2017 with an address of 801 East 4th Place, LA 90013. They also sent another email which indicated that the next meeting would be held on April 15, 2017 at the same location. There were six DSA members that were issued voting credentials.

Rosters provide a solution to documentation challenges and should be encouraged. That said, the rosters also take the time of our PUP poll workers, especially when the rosters are

unorganized or not in alphabetical order. Further complicating matters was that rosters were being sent in electronically as the PUPs were taking place or, after the team had already left ELA. There were times where we could look a roster up by email, but this process slows a line and frustrates a voter.

Recommendation

Printed rosters should be collected and available only on election day when we are properly staffed. As part of the election outreach for Neighborhood Councils who require documentation, verification letters (PDF or printed) should be the standard documentation for both documentation uploads and also PUPs.

Because there seems to be ongoing confusion about the format and the wording of the letters, the elections team could provide different Community Interest Stakeholder letter formats that are applicable to a business, an organization, a school and that are field editable and available online.

PUPs

There was a tremendous amount of feedback about PUPs. Specifically, who hosts them, were they are located, and the time they are open. Despite some of the feedback, the Department had very successful PUPs, two with over 100 voters. Because PUPs allow the opportunity to bring the election to the voters and out in the community, they serve an important purpose.

There were campaign advocates at most of the PUPs expressing their opinions from beyond the 25-foot electioneering zone. The challenge for our PUP staff was that 25-feet is close enough for voters and advocates to engage in a conversation. Further, the use of voice amplification was used and we could hear advocates expressing their views inside the polling place.

For Neighborhood Councils that vote with documentation, those who are experiencing homelessness may not have the proper documentation to participate at a PUP. For this reason, the Department heard feedback from both those who are experiencing homelessness and advocates. While the Department did provide flyers at all PUP locations with information about how and when to vote, staff did have to turn away some voters with no documentation with instructions to come to the Poll on election day instead.

Recommendations

One of the ongoing and predominant concerns is host and location bias. In the future, identifying and scheduling the PUP locations could be a responsibility of a Neutral Third Party (NTP) rather than candidates or choice. Further, there could be a limit on the number of PUPs per week for an Neighborhood Council or, per election or, number of open polling hours. Also, staffing needs to be considered carefully to ensure there are enough people to assist voters. Staff also need to investigate the PUP locations ahead of time to make sure they are safe.

PUPs are becoming polling locations. Each PUP should have proper signage posted for what is required to vote (documentation vs. self affirming), electioneering signage, and properly staffed. Keep polling place/ PUP electioneering rules consistent at 100 feet.

A solution needs to be found where staff can verify and vote homeless stakeholders at all polling locations, including PUPs. If it were possible through the E1C portal, homeless stakeholders at PUPs with one form of photo ID could be verified as a "homeless stakeholder", and then entered as a voter, but noted as a homeless stakeholder. This could be done in either a new field or, as part of the voter documentation verification field.

Technology

If a voter has all of their documentation, the data entry at PUPs is the most time consuming part of the voter process. However, if the poll worker needs to walk a voter through the documentation process, then that could be the most time consuming part of the process. Therefore, because this was a documentation election, staff added a document review/ voter verification step at both the PUPs and the election to regulate the line, and streamline the voting process.

Recommendation

When PUPs have a small number of voters, working from the tablet with a working keyboard is adequate. However, when a keyboard is not working or there are a large number of voters, the process is quicker and more accurate when staff work from laptops.

Audits

In addition to routine audits, the Department sent the names of 16 voters who claimed they had no credentials to verify that credentials had been sent. The audit revealed that the emails with the credentials had been sent. Because of the short turnaround, there wasn't the time to conduct outreach on spam folders, etc. so the fastest solution to "I didn't get my credentials!" was to look them up, find their credentials and send them again.

Recommendations

Online voting with Documentation is simply cumbersome and creates an obstacle that is difficult to overcome. Voters struggled to document their stakeholder status and the result was 26 rosters that were being updated daily, resulting in over 4000 names. This added a burdensome process to the mix, requiring staff at online verification, Pop-Up Polls, and at the polling location to check rosters that ranged in size from a dozen names to almost a thousand, in order to verify the voters. This would be unnecessary if the online elections were self-affirmation though online voters would still need to establish their identity somehow.

E1C/ Searchable Data

Important feedback from poll workers was that when a birth date is searched, you can look in two different formats 01/01/2000 or 01/01/00, and depending on how it was originally entered, you will get different results. In other words, if you are looking for a voter whose birthday is 01/01/2000 but you enter 01/01/00, the search would **not** yield any results. Unless you enter the birthday in the format that it was originally entered, the person may not be found.

Recommendation

Based on what we learned, E1C should only allow for one birthday date format.

Skid Row Election Day
For election day, staff anticipated and prepared for 1000 self-affirming homeless stakeholders who would vote by ballot. However, on election day, the majority of voters were prepared with documentation or, were on a roster and therefore were voted through E1C.

To prepare for a large turnout, staff organized the flow of the room to make the process both as logical and as efficient as possible. Further, staff reorganized the team as needed, and added tablets throughout the day to adjust for our needs and the large number of e-voters. By the time a voter reached the entry door of the polling place, they were prepared with their registration form and documentation, they were met with a welcome, and then directed to know where to go next.

While there was a line for most of the day, staff successfully voted 614 stakeholders and moved the line as quickly as possible. As the day progressed, the election team was working efficiently to organize and prepare our voters, regulate the flow of voters, and work with our voters at each step of the way and answer their questions.

Recommendations

The setup and the flow of the room is a major factor in deterring voter experience at both PUPs and on election day. In having the additional voter verification step before the voter registration and credential step, staff then free the registration team to focus only only data entry and providing credentials.

The team working with voters at the entry door and providing registration forms plays one of the most important roles of the day. They not only welcome our voters and set the tone, but they prepare them for what they need to have ready and what to expect at the next steps. They play an important role in fielding questions, and diffusing situations before they enter the polling place. One of their most important roles is regulating the flow of voters into the polling place. The energy of a polling place can be easily disrupted when there are voters who have not been properly directed, or informed, therefore this team is essential to the success of the day and the voter experience.

The nature of the not pre-registered, documentation voters is that it takes additional time to verify their documentation, register them in the E1C portal, and provide their voting credentials.

Going forward, this process may become more efficient as staff can build the voter database. The outcome would be that this process will take less time at each election.

Election or Commission?

There was a significant amount of resources dedicated to the subdivision elections, especially for the online voting Neighborhood Councils=s and with the PUPs. This effort provided the Department, the Neighborhood Councils, and the formation committees the opportunity to connect with many stakeholders, local groups, businesses, organizations, and community interest stakeholders. This effort resulted in successful PUP and Election day.

Over two weeks, the elections team worked with each and every voter with the goal to help them through the process. In addition to elections related questions and issues, staff answered questions about the Department, the role of the elections team, and the role Neighborhood Councils play in their community. At final count, the election team voted 1,388 voters, many of them new to Neighborhood Council elections or re-engaged voters.

Had this process only gone before the Board of Neighborhood Commissioners, the Department would have missed the opportunity to connect with the Neighborhood Council stakeholders, hear what they had to say, answer their questions and engage them in the election process.

Suggestions for Rosters

Rosters would be easier to manage if they were submitted via Google Forms or some other sort of form that would impose a uniform format on materials received, and generate a searchable database. They can be submitted online before a certain deadline (such as 5 pm the day before the official Election Day) but at the polls, only paper submissions should be accepted. Email submissions should not be accepted on Election Day, even if the polls have not yet opened.

Many people who submitted rosters did not understand that their members could only be verified as voters if the roster was received before the voter's registration was reviewed. It is the organization's responsibility to let their members know when the roster has been submitted, and receipt is confirmed. Otherwise, those who register before their roster is received will have to register in person at the Election Day polls. Those points should definitely be underscored in election outreach next time.

Suggestions for Voter Data Entry

Accurate, complete and consistent voter data is vital to carrying voters over from year to year and to streamlining the process of adding voters to the database. A couple small tweaks could assist with the accuracy and speed of data entry when registering voters at the polls.

Dropdown menus for birth dates would create consistent data in that field - something similar to what a liquor company uses on their homepage would be ideal. Dropdown menus or multiple choice lists would actually be very helpful for many other fields as well, such as Live/Work/Own/Community Interest.

Unused fields on the E1C admin page should be removed altogether, to prevent confusion. For example, there was a "group ID" field at the top of the voter registration page that staff never use, but its presence meant that a voter's username and password would often wind up entered in the wrong fields, invalidating the registration and causing it to have to be done over.

Autofills can save time during voter registration by allowing automatic reentry of repetitive data like addresses of roster organizations, but autofill can also be problematic. For example, the tablets used during the Skid Row election would autofill the word "Email" if you typed "E" for East in an address.

DLANC and HCNC stakeholders who voted in the 2016 NC elections were pre-verified to vote in the Skid Row election, and an email was sent to tell them so. However, 10% of these emails (125 total) bounced, and 37% of those bounced happened because of typos in the email addresses (46 of 125 total bounces). Most of these typos probably occurred because it is difficult to enter voter data accurately and quickly on a tablet when working the polls.

Breaking down the data entry work at the polls into a two-part process would help us keep voters moving through quickly during an election, yet allow us to still create an accurate database. Poll workers can enter minimal information to set a voter's account up to enable them to vote; send the voter on their way to the voting booth; then pass the registration form on to another staff member, who would enter the rest of the information. The data entry staff could work on full-size keyboards to increase the speed and accuracy of their data entry.

CITY OF LOS ANGELES
CALIFORNIA

**ERIC GARCETTI
MAYOR**

November 07, 2017

Honorable David E. Ryu, Chair
Health, Education, and Neighborhood Council Committee
Councilmember, Fourth District
Los Angeles City Hall
200 N Spring Street, Room 425
Los Angeles, CA 90012

Honorable Committee Chair Ryu:

The Hermon Neighborhood Council was the first successful subdivision in the City of Los Angeles. On May 25, 2017, the Board of Neighborhood Commissioners approved the Hermon Neighborhood Council bylaws in accordance with the Neighborhood Council Subdivision Ordinance Sec. 22.819, paragraph d. During this process, the Commission observed challenges implementing the process of the Subdivision Ordinance and believed should be addressed.

The Commission has held discussions, regarding amendments to the ordinance, on their agendas since our special meeting on July 12, 2017. Neighborhood Council Board Members as well as community stakeholders have commented on the proposed amendments at our meetings since it was first agendized. The text of the proposed amendments have been made available for public comments since our August 3, 2017 special meeting.

At the regular meeting of the Board of Neighborhood Commissioners held on October 16, 2017, we approved the final version of the proposed amendments. At this meeting, your Field Deputy, Mr. Nicholas Greif, stated the Health, Education and Neighborhood Council Committee expected the Commission to provide recommendations to amend the Subdivision Ordinance.

The Department of Neighborhood Empowerment has informed the Commission, they will open the Subdivision Application process in November. The Commission feels this is the appropriate time to submit this matter to your Committee for review and consideration.

The Board of Neighborhood Commissioners respectfully submit the following amendments to Section 22.819 of Article 3 of Chapter 28 of the Los Angeles Administrative Code (Neighborhood Council Subdivision Ordinance) for consideration: *(proposed language changes in bold and italic and or ~~strikethrough~~)*

Proposed amendments to Administrative Code Section 22.819 – Neighborhood Council Subdivision

(a) Subdivision Petition. A stakeholder within an existing certified Neighborhood Council who desires to form a separate certified Neighborhood Council within the boundaries of one or more existing certified Neighborhood Councils shall submit a subdivision petition to the Department of Neighborhood Empowerment (Department) on a form approved by the Department. The subdivision petition shall identify five stakeholders who are authorized to receive notice and make decisions regarding the subdivision petition, including any bylaw changes. The Department shall review the subdivision petition to determine if the subdivision petition complies with the components of a Certification Application stated in Article III, Section 2 of the Plan for a Citywide System of Neighborhood Councils (Plan), except that the subdivision petition may propose boundaries that are within one or more existing certified Neighborhood Councils. ***The Department shall notify all affected certified Neighborhood Councils when a subdivision petition is requested. The Department shall also notify all affected certified Neighborhood Councils when a subdivision petition is filed and when any amendment or amendments to the original petition are filed. The petition and any amendments shall be posted on the Department's web site. Notice shall be given to all current board members of the affected certified Neighborhood Councils on file with the Department, and shall include a link to the original petition and any amendments. All such notices shall be accomplished as soon as practicable.***

*(b) **Outreach. The Department shall be responsible for outreach to both the proposed subdivision and any affected certified Neighborhood Councils. Where possible the Department shall hold informational town hall meetings in both the proposed subdivision area and within the boundaries of any affected certified Neighborhood Councils excluding the proposed subdivision area. Outreach by the Department shall not relieve the proponents of the proposed subdivision of any outreach requirements imposed by the Department.***

(c) ***Petition, Bylaws and Boundaries. After conducting suitable outreach, but in no event longer than 90 days after final approval of the subdivision petition by the Department, the Department shall forward to the Board of Neighborhood Commissioners (Commission) the approved subdivision petition and the bylaws of the proposed subdivision. Within 30 days the Commission shall hold a hearing in the proposed subdivision area for the purpose of reviewing the subdivision petition and the proposed bylaws and boundaries. The Commission, after making any necessary findings shall approve or disapprove of the subdivision petition. If the subdivision petition is approved, then the Commission is authorized to make any amendments to the bylaws to satisfy Article III Section 2 of the Plan. The Commission is also authorized to make any amendments to the boundaries that it deems necessary to preserve the integrity of the affected Neighborhood Council or Councils and the subdivision.***

(d) **Election Approving a Subdivision.** The Department shall conduct an election within the boundaries stated in the subdivision petition within 90 days of the ~~Department's approval of the subdivision petition~~ ***Commission's approval of the subdivision petition and the bylaws and boundaries. Where possible the Department shall also locate additional poling locations within the boundaries of the affected Certified Neighborhood Councils outside of the proposed subdivision area.*** A stakeholder is eligible to vote in the election if the person is a stakeholder in the proposed area for subdivision or in any of the Neighborhood Councils that are proposed for subdivision. A majority of the voters from the entire Neighborhood Council or Neighborhood Councils being subdivided must approve the subdivision in order to create the new Neighborhood Council. ***If, after certification of the election by the Department it is determined that a majority of the stakeholders voting at the election approves of the***

subdivision the Department shall forward the results to the Commission for certification of the subdivision as a Neighborhood Council at its next regular or special meeting.

(e) **Bylaws for the Existing Neighborhood Council.** ~~If a majority of the stakeholders at the election approve the subdivision,~~ *If the Commission certifies the new Neighborhood Council,* then the existing certified Neighborhood Council or Neighborhood Councils being subdivided shall amend their bylaws within ~~30~~ *60* days of the ~~election~~ *certification* to reflect changes to the boundaries and, if applicable, the board structure. If the existing certified Neighborhood Council or Neighborhood Councils fail to provide amended bylaws within ~~30~~ *60* days of the ~~election~~ *certification* then the Department is authorized to amend the bylaws to reflect any changes to the boundaries or board structure. The Department shall forward the bylaws for any Neighborhood Council that is being subdivided ~~and the subdivision petition~~ to the Board of Neighborhood Commissioners *for approval of the bylaws. The Commission is authorized to make any amendments to the bylaws to satisfy Article III Section 2 of the Plan.*

Thank you for considering our position and feel free to reach out to our Commission for clarification.

Yours truly,

Joy Atkinson, President
Board of Neighborhood Commissioners

Cc:
Mayor Eric Garcetti
Council President Herb J. Wesson, Jr, Tenth District
Council President Pro Tempore Mitchell Englander, Twelfth District
Council Assistant President Pro Tempore Nury Martinez, Sixth District
Councilmember Gilbert A. Cedillo, First District
Councilmember Paul Krekorian, Second District
Councilmember Bob Blumenfield, Third District
Councilmember Paul Koretz, Fifth District
Councilmember Monica Rodriguez, Seventh District
Councilmember Marqueece Harris-Dawson, Eighth District
Councilmember Curren D. Price, Jr. Ninth District
Councilmember Mike Bonin, Eleventh District
Councilmember Mitch O'Farrell, Thirteenth District
Councilmember Jose Huizar, Fourteenth District
Councilmember Joe Buscaino, Fifteenth District
City Attorney, Mike Feuer
General Manager Grayce Liu, Department of Neighborhood Empowerment
Director of Policy and Government Relations, Mike Fong, Department of Neighborhood Empowerment