

**Environmental Document**

**Torrance Street TMDL Source Study  
Parking Frequency & Street Litter**

**Prepared under the guidelines of the California  
Environmental Quality Act (CEQA)**

**June 25, 2014**

**Independent Field Study  
Surface Street Analysis, Zip Code 90505**

# Parking Frequency and Street Litter Study – Torrance, California

Study Period – May 26<sup>th</sup> – June 16<sup>th</sup> 2014

**Findings** -- This study offers further proof that Torrance’s “optimized” street sweeping plan will have only a minimal impact in reducing stormwater pollution and is primarily intended as a revenue generating scheme.

**Purpose** – The purpose of this study is to provide some basis for judging the efficacy of Torrance’s “optimized” street sweeping plan. Because the State granted a CEQA Exemption, Torrance did not conduct an environmental impact study. Furthermore, no supporting analysis can be found proving either the effectiveness or necessity for ticketing/sweeping programs in low-density neighborhoods. **Based on available information, the City is launching its multi-million dollar program without having conducted any study in support of its claims.** Due to the absence of this essential information, we collected relevant data in an effort to add some benchmarks for analysis. Our findings were consistent with earlier observations, that the City’s plan will have little effect on reducing pollution.

**Details** – The goal of this study was to show parking patterns during street sweeping hours over consecutive periods and to judge gutter/street litter totals over a three-week span. The study area covered approximately 0.5 curb miles on Sharynne Lane, from Doris Way to Dennis Rd. (Seaside Elementary). The parking portion of the study consisted of a point-in-time census of parked vehicles, with notation for front, middle, or back of available parking area per each address, conducted during the scheduled street sweeping time window.

5/26/2014	6/2/2014	6/9/2014	6/16/2014
4813F	4813M	4807F	4813B
4825B	4831F	4813M	4813F
4919F	4925F	4825F	4919F
5013M	5025B	4913F	5007B
5019F	5107M	5007B	5013B
5025B	5109F	5013B	5019B
5107M	5113B	5019F	5019F
5313M	5125M	5025B	5025B
5405M	5405B	5107M	5031B
5427F	5405F	5125M	5107M
5441M	5427F	5131F	5349F
5465M	5433M	5335B	5465M
	5441B	5335F	
	5479M	5341F	
		5405F	
		5441M	
		5465F	

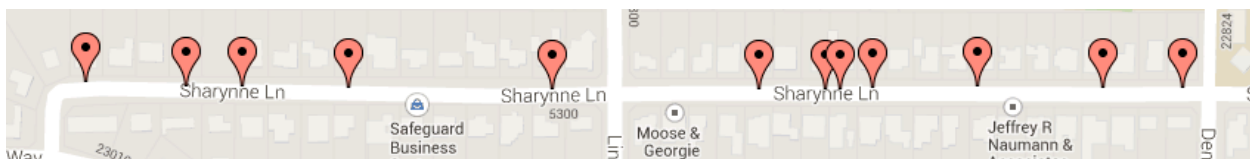
**Dispersion** -- The following chart shows the location of each parked car, with a letter designation for curb position (Front, Middle or Back) in the parking area at each address. The reason for this letter designation is that the majority of residences have curb space for at least two parked cars.

Period	Cars
Week 1	12
Week 2	14
Week 3	17
Week 4	12

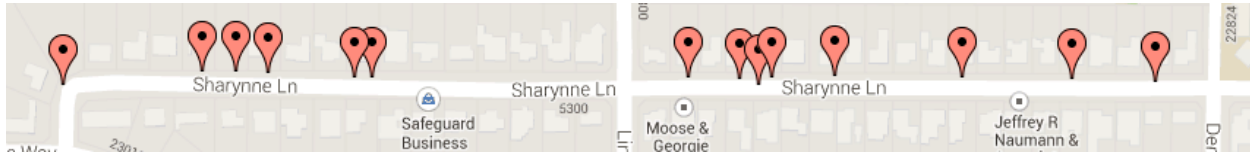
Week 3 had higher than average totals due to the presence of a significant number of commercial vehicles (contractor, electrician, etc.).

The average for the four-week period was 14 cars, with a mean of 13. Parked vehicles typically covered about 17% of the available curb space each week, though this total is skewed due to the presence of multiple active construction projects, which added many non-resident commercial vehicles during the entire sample period. At the completion of these building and renovation projects, the average weekly parking figures should normalize at a lower rate.

The following maps (weeks 1 & 4), show the diversity of parking patterns for the sample area over a one month period. This diversity was fairly consistent across all four weeks, with the exception of a few addresses and the previously mentioned construction sites.



**Week One Parked Vehicle Distribution**



**Week Four Parked Vehicle Distribution**

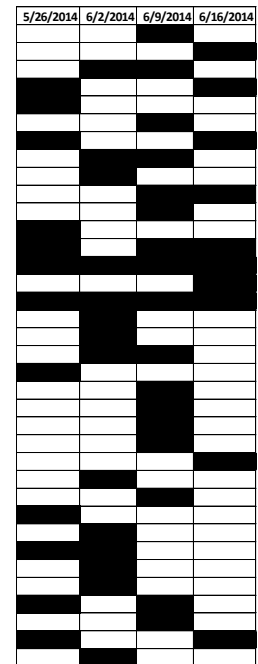
Weeks 2 & 3 showed similar variability. While this is just a sample, our study provides solid evidence that over a 3-6 week period in a low-density neighborhood, **car movement will eventually lead to almost full sweeping of the available curb area.**

**Observation** – The accompanying chart shows all of the 36 unique spots occupied by vehicles during each of the different street sweeping days over the four-week sample period. By the 2<sup>nd</sup> week, only three spots could not be swept, a number that would fall to only two by week three. By the end of the study period, only two spots were unswept. At least one of these vehicles is clearly in violation of Torrance Municipal Code 61.6.4 and could be ticketed and removed.

**That would leave just one spot (16’4”) of unswept curb space after three weeks.**

ii. Each Permittee shall perform street sweeping of curbed streets according to the following schedule:

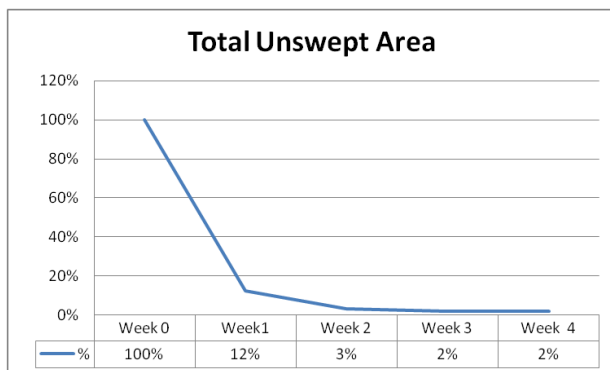
- Priority A:** Streets and/or street segments that are designated as Priority A shall be swept at least two times per month.
- Priority B:** Streets and/or street segments that are designated as Priority B shall be swept at least once per month.
- Priority C:** Streets and/or street segments that are designated as Priority C shall be swept as necessary but in no case less than once per year.



Each line represents a single parking spot. Each black box represents a parked vehicle.

**Parking Thesis** – While this is just a sampling of one street and results will vary by neighborhood, it does support our previous thesis that the current street sweeping plan already covers a majority of the available surface area. **This sample provides indisputable evidence of the absurdity of the City’s 50% expected improvement in additional pounds from its “optimized” program.**

Even a mandatory program with ticketing can never achieve 100% compliance. (With 100% compliance, there would be no tickets written.) Our statistics show that the current program is equivalent in some areas to the City’s “optimized” plan and exceeds the full requirements for Priority B and C regulations (see above), as prescribed by the California Regional Water Control Board under Order R4-2012-0175.



Based on this evidence, it is possible to claim that the City could achieve equivalent results through an alternative plan that more actively enforces Municipal Code 61.6.4 for abandoned vehicles and through an education program that stresses volunteer compliance. The cost differential between an alternative plan and the City’s scheme is staggering. **The City is proposing spending \$2.0 million, with an unknown, annualized cost of \$1.0-2.0 million, for the same outcome that it could achieve for less than \$50,000. This**

**represents one of the most wasteful programs in this City's history in terms of money spent vs. eventual outcome.**

**Air Quality Impact** -- What is not addressed is the air quality impact of adding six police vehicles with eight hour shifts onto the roadway, combined with the process of citizens moving thousands of cars twice on sweeping days, five days a week. While street sweeping equipment pollution is minimal, these other sources are not. Reducing cold engine starts is a major point of emphasis for every environmental agency and a common theme in studies and public outreach. Both the EPA and Air Quality Management Board discuss this topic at length in numerous publications and on their websites. The following excerpts from these agencies highlight this issue:

... up to 80% of the emissions during the Federal Test Procedure occur during the first few minutes when the engine is running rich, the oxygen sensor is not yet operational, and the catalytic converter has not reached its light-off temperature.

If you must drive, you can reduce your auto's pollution by minimizing "cold starts". A cold car, one that been sitting for an hour or more, pollutes up to five time more than a warm car. This is because the engine's air pollution control device, the catalytic converter, takes several minutes to warm up and work efficiently. By linking trips

At a very conservative 30 cars per curb mile, **the City's "optimized" plan will eventually lead to almost 130,000 cold-starts per month, reaching a staggering 1.7 million per year, creating a major source of new air pollution.** Given proof that street sweeping does not need to be done on a weekly basis to be effective and the total unswept area after two to three cycles is negligible in the low-impact areas, **the city has effectively created a major new source of pollution.**

**How Bad Is The Litter Problem?** – Interestingly enough, the City provided an unusual opportunity to study the gradual accumulation of street litter, because it halted street sweeping for three weeks during reconfiguration of sweeping routes. To judge the scope of the litter issue, we first observed all of the trash accumulating during each week of this sweep-free period. At the end of three weeks, we collected all of the refuse that could be transported into a storm drain in a rain event. For obvious reasons, we did not collect the leaf residue, but took pictures of sample areas.

The amount of trash actually decreased between weeks two and three, a testament to the good citizenship of the residents in the target area. The most observable litter came from Seaside Elementary School, the two construction sites, and smokers. Ironically, the largest single piece of refuse was a Ted Lieu for Congress flier. In total, the amount of street litter collected weighed only a few ounces, despite no street sweeping for three weeks. Leaf and other vegetative residue were also minimal, as these photos indicate.



***Three Weeks without Sweeping***



***After Sweeping***





**Litter collected from 0.5 curb miles after three weeks without sweeping.**



**Random gutter -- three weeks without sweeping**

***Based on the small amount of trash collected, it is safe to conclude that these low density areas are very clean.*** This is even more remarkable because our study area is bookended by a grade school (Seaside) and a baseball complex (TABB), providing significant sources of litter. These results show that the City will realize a majority of its incremental improvement during the first week of its optimized plan as chronically-unmoved cars finally move (something that should be done anyway under Municipal Code 61.6.4), creating a one-time cleaning event that primarily involves leaf residue around the tires. However, in the following three to six-week period, sweeping totals will begin to show no or miniscule improvement as they replicate the current coverage patterns.

Put another way, even if the City collects 3x the trash we found in our study and covers 10X the current unswept area, **it would spend an astonishing \$700 for each pound of extra trash collected.** In reality, this incremental improvement will most likely run over \$1,000/pound.

**The City’s Changing Stance on Organic Residue** – Although the study area is the most heavily foliated part of the city, after three weeks the streets showed little organic matter. This is consistent with the seasonal nature of tree residue, and the minimal buildup of lawn and other garden waste.

The City has shown convenient duplicity on this subject, changing its position to suit its argument. In the Comment/Response section (page 14) of the *Substitute Environmental Document* for Machado Lake (February 2008), **Torrance argued that it was impossible without extensive study to determine the source of nutrient pollution**, and offered its own explanation – **blaming this pollution on commercial nurseries.**

However, in communication with residents, the City cited nutrient loads from residential sources as a key reason behind their need for forced sweeping compliance. Officials’ sudden clarity on the subject came without any study or analysis, conveniently timed to support a program with no scientific proof.

<b>Comment</b>
<p>The City of Torrance strongly encourages the California Regional Water Quality Control Board to NOT set numeric water quality targets and waste load allocations for the various agencies for nitrogen, total phosphorus, ammonia, chlorophyll and dissolved oxygen because it is impossible to determine where those sources of pollutants are coming from before a</p>
<p>loading came from commercial nurseries. The most effective way to reduce nutrient loads in Machado Lake is through source control of commercial nurseries and BMPs to reduce soil sediments to reduce phosphorous. The TMDL should require the cities and county to adopt regulations requiring commercial nurseries and agriculture enterprises to obtain an NPDES permit and implement waste discharge BMPs that have specific effluent limits.</p>

## Upholding the Spirit of CEQA

### *According to CEQA Guidelines section 15126.6:*

*“An EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”*

*Notably, the purpose of the alternatives analysis is to ascertain whether alternatives exist that offer substantial environmental advantages over the project proposal....; and (2) may be ‘feasibly accomplished in a successful manner’ considering the economic, environmental, social and technological factors involved.*

CEQA guidelines specifically call for the consideration of feasible alternatives, informed decision making and public participation while examining the environmental impact of a plan. The City of Torrance has consistently failed to uphold the spirit of these guidelines, but the State also failed by not requiring an Environmental Impact Report (EIR) for the wide scale implementation of signage and forced compliance. When a waiver is granted, all parties involved create an assumption that EIR guidelines have already been met or will not be violated.

**Conclusion --** This study defining sweeping frequency, parking patterns and trash dispersion was conducted in good faith to provide some data points concerning the city’s position on its “optimized” street sweeping plan. Our findings give us complete confidence in our earlier conjecture that Torrance’s “optimized” program:

- will have little net positive environmental impact and may actually create new, greater sources of pollution
- was undertaken without supporting scientific evidence or consideration of alternative plans
- relied on misleading and unattainable outcomes
- was “sold” to residents using consistent exaggerations and scare tactics
- defied every government agency guideline concerning public involvement
- represents one of the most wasteful misuses of public funds in City history
- and is primarily a revenue-generating scheme

We suggest the following alternative:

- Suspend the “optimized program,” cancelling the signage and ticketing elements
- Create a public awareness program to sensitize citizens on the importance of trash-free streets and storm drains

- Publicize the benefits of voluntary no-parking on sweeping days
- Actively enforce Municipal Code 61.6.4 to move vehicles that remain parked for weeks or months at a time

This alternative plan will almost certainly achieve a similar outcome to the “optimized” plan, but without the annual expense of \$1.0-\$2.0 million, added stress for residents, and the visual pollution of 10,000 or more parking signs.

The findings in this study coupled with previous analytical pieces form an unassailable argument against the City’s parking/sweeping plan. It is hard to imagine any citizen or leader supporting the “optimized” plan in its current form in the face of this evidence. Our hope is that logic will prevail, before the City implements and expands this deeply flawed program.

Finally, one may wonder why a small group of citizens would spend so much time and energy to oppose a program that to the casual observer must be beneficial. The answer is simple. This “optimized” plan is not what it purports to be, but is actually a revenue scheme designed by a City that is desperate for new sources of income and is willing to mislead and manipulate its citizens in pursuit of that need. All government decisions should have as their starting point, the goal of creating the greatest public good for each dollar spent. When that goal is flipped, and the overriding purpose is to gain another source of income from the public, the City becomes self-serving.

Our elected officials crossed a line with many of us, losing, through their actions, both our trust and confidence. We would hope that someone in government (at any level) will apply some sense of logic and duty to review and repair the City’s plan, which in its current form, represents an egregious waste of taxpayers’ resources and an affront to our role as stakeholders in our City’s future.

Citizens of Torrance Against Government Waste (06/24/2014)