

## Torrance Optimized Street Sweeping – Additional Proof of Hidden Agenda

**Purpose** – The purpose of this analysis is to offer additional evidence that the Signage/Ticketing portion of the City’s proposed optimized street sweeping program is unnecessary, has been grossly overstated in terms of effectiveness, and is actually a hidden effort to increase revenues via parking tickets. The full grant application can be viewed on California’s State Water Resource Control Board site (**Pin No: 24184 - Machado Lake Trash TMDL**). <http://www.waterboards.ca.gov>

**Evidence** – In previous documents we have shown that the City was duplicitous in its communication with residents concerning potential fines, government requirements, and the effectiveness of the proposed program. An analysis of the grant proposal reveals a similar pattern of behavior. In many ways, the signage portion of this grant was similar to a legislative rider. While the screen portion of the grant was absolutely necessary for program compliance, the sign portion was an add-on that was unsupported in the grant. Unbelievably, *no hard evidence was ever given in this multi-section grant proposal proving either the effectiveness or necessity for enhanced street sweeping and ticketing programs.*

Even more incredible is the fact that the proposal contains equal measures of language actually questioning the role of street sweeping in meeting goals. We will note these as follows.

### Reference 1 – Effectiveness Unknown

#### Street Sweeping

Street sweeping is one of most effective methods to keep debris, vegetation wastes, and trash away from catch basins. **Although the correlation between street sweeping frequency and amount of trash collected in the waterbody is not confirmed in the Machado Lake area, it is convincing that more street sweeping will allow less trash to be flushed by stormwater to the catch basins, and to be discharged to waterbodies of concern.**

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31

Machado Lake Trash TMDL

This is one of the strongest affirmations of street sweeping in the entire application, but still admits that the correlation of sweeping frequency to trash collected is unknown. This would seem to be an essential piece of knowledge before a city launches a \$2.0 million program. The lack of any hard evidence in the grant application is indicative of the urban myth status of street sweeping as a “silver bullet” in stormwater pollution control.

A scan of this entire application shows no hard evidence of the need for an enhanced sweeping program. This indicates a preconceived acceptance on the part of the State, which issued the grant without any real statistical proof.

**Reference 2 – The Wrong Priority** -- Torrance’s optimized plan calls for increased enforcement in the lowest priority segments of the city. However, under the institutional controls section of supporting documents, cost effectiveness is mentioned as a function of shifting the emphasis from low to high trash areas, *the opposite of the city’s plan*. It also states that trash reduction is unknown.

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| <ul style="list-style-type: none"><li>• Optimize street sweeping operation</li><li>• Can be cost neutral if sweeping is shifted from low to high trash areas</li><li>•</li></ul> |
| <ul style="list-style-type: none"><li>• Unknown trash reduction</li><li>• May require overtime during fall</li></ul>   |

**Reference 3 – Already Exceeding Requirements** -- The City has created a sense of dire need in implementing this optimized plan. However, as previously stated, the City is already exceeding requirements.

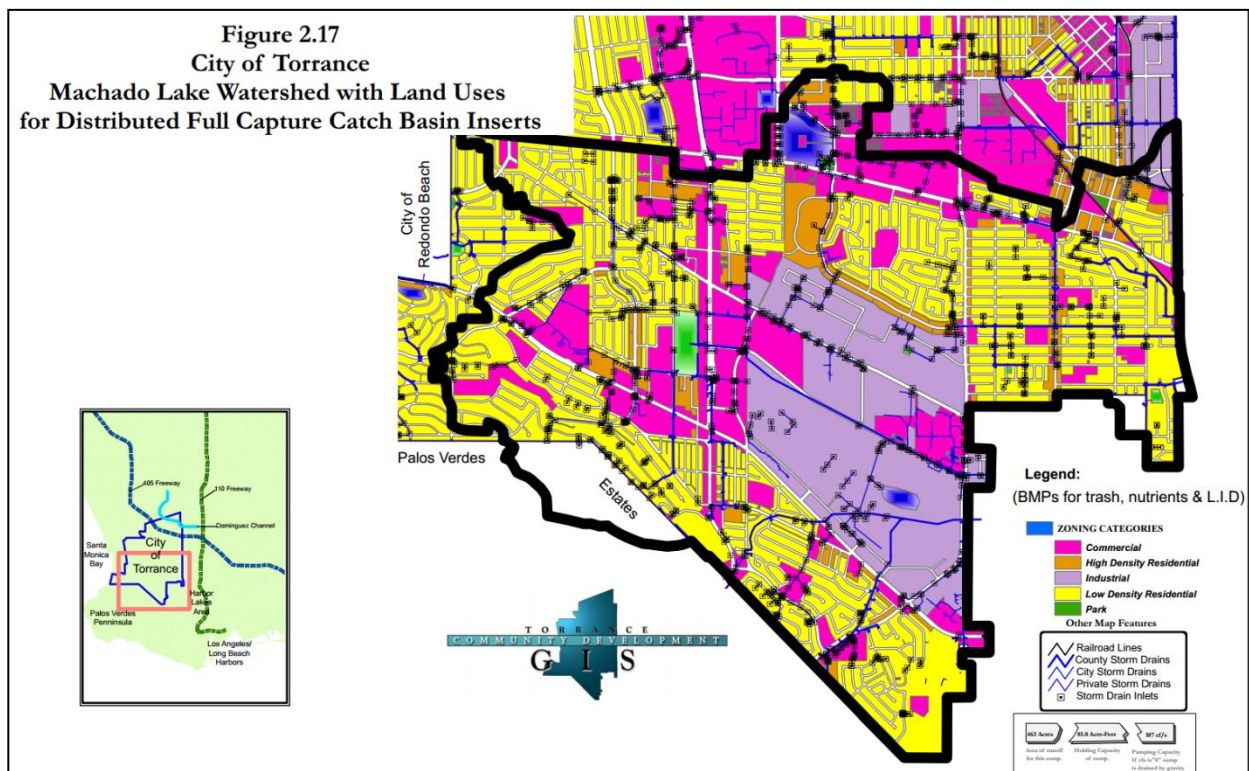
ii. Each Permittee shall perform street sweeping of curbed streets according to the following schedule:

**Priority A:** Streets and/or street segments that are designated as Priority A shall be swept at least two times per month.

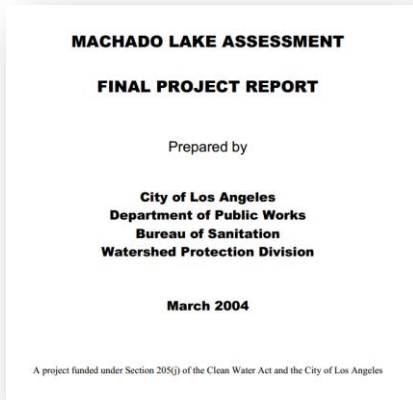
**Priority B:** Streets and/or street segments that are designated as Priority B shall be swept at least once per month.

**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.

The map from the Lake Machado Grant tells the true story. The yellow represents low density residential areas, which equate to Priority B or C status under the government guidelines. Clearly the vast majority of the new ticketing areas would fall under priority B or C status and are already in compliance. The City knew this prior to pushing forward with its ticketing plan.



This map offers visual proof of their real intent – to expand the ticketing program to the rest of Torrance in an effort to gain a steady stream of revenue. Currently, ticketed areas cover only 9%, or 52 of the 587 curb miles in the city. **Expanding this program to cover the entire city is a major decision, perhaps one of the most widespread in the city’s history. To undertake this effort with almost no public discussion, and without providing any hard evidence of need or effectiveness, can only point to a secondary motive.**



Even the original study on Machado Lake, the *Machado Lake Assessment Final Project Report prepared by the Los Angeles Department of Public Works Bureau of Sanitation Watershed Protection Division (March, 2004)*, paints a different picture than that presented by Torrance City government.

This 131-page report, which coincidentally, fails to mention street sweeping even once, clearly identifies trash as the main target of concern, while deemphasizing some other commonly referenced pollutants. The report also states that suspended solid concentrations (often cited by Torrance officials), which contribute to sediment in the lake, were within normal ranges of stormwater runoff.

The 2004 study is important because it is the starting point for subsequent remediation efforts and the City’s grant proposal. Storm drain screens and capture systems fully support the remediation efforts desired by the Final Project Report. Street sweeping/ticketing programs, along with references to other pollutants frequently cited in the City’s argument, do not. **Incredibly, rather than acting as a logical antecedent to the City’s Optimized plan, this important study consistently refutes or minimizes the City’s main reasons for implementation.**

Trash is the most visible pollutant at the lake and has been most noticeable near the storm drain outlets into the lake, especially around the Wilmington drain. Based on the results of phosphorus and nitrogen analysis during the 2001 and 2003 sampling programs, there is a slight potential for eutrophication in the lake, although there was no clear evidence of algal bloom during the sampling events. This observation, compounded by the satisfactory DO readings in the lake, diminishes the nutrients as pollutants of concern.

**Reference 4 – Misleading Information --** The city used misleading information as part of its grant proposal. In the “Targets” category of the Performance Measure Table, the city claims a target of a 50% increase in the pounds of trash and sediment collected as a result of the 2,000 no parking signs. This is a convenient way to create a false expectation, without actually having to stand behind it. The City could have just as easily said 99%, without any chance of meeting that goal.

This figure implies that the city would be sweeping 50% more unswept area than it currently covers. Because the city already sweeps all of these streets, this unswept real estate can only refer to each segment of the street that contains a vehicle that never moves or a parking spot that has persistent occupation. To contend that 50% of all of the targeted streets have high-density parking is a false

Performance Measure Table Attachment 7 Machado Lake Trash TMDL Implementation Application to the Proposition 84 Stormwater Grant Program PIN 24184					
Project Goals	Desired Outcomes	Output Indicators	Outcome Indicators	Measurement Tools and Methods	Targets
2. . Prevent trash, organic debris and sediment from washing into storm drains through improved street sweeping in the City of Torrance.	Achieve the numeric target of “zero” trash in Machado Lake.	Installation of 2000 “NO PARKING” signs in the City of Torrance.	Measures of trash and sediment picked up from street sweepers. Pounds of debris collected from street sweeping will be converted into gallons of uncompressed trash.	1. <b>Tools-</b> Street Sweeping vehicles and truck scales.  2. Street Sweeper Transfer Station provides for dewatering of trash to provide consistent pounds to gallon conversion factor.	1. 50% Increase in the pounds of trash and sediment collected via effective street sweeping in the City of Torrance.



assumption. Even a ticketing program will not achieve 100% coverage, and cars move, so that over a three- to four-week period, the unswept portion of a street may only equal 5% or less. In similar cases in other cities, additional poundage was negligible and even down following the implementation of ticketing and forced compliance in low-impact areas.

**The 50% Fallacy** – No reasonable person with knowledge of street sweeping technology would predict a 50% increase in street sweeping tonnage based on a mandatory enforcement program targeting low-impact areas that already have some form of sweeping. The reasons for this are threefold:

- The city has already implemented forced compliance in the highest density/impact areas, so most of the “low hanging fruit” has already been picked
- To achieve an increase of 50% in overall citywide pounds, the city will actually have to show an increase in efficiency in the low impact areas of 60% or higher
- Under the current system, the total area of unswept street surface diminishes each week as the parking pattern changes, so that in most low-impact areas, it approaches 5% or less after a period of 3-6 weeks.

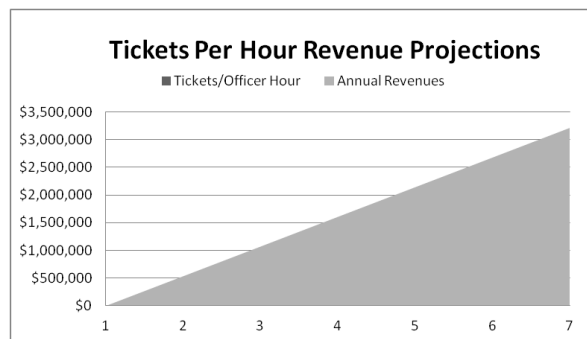
There is another way to measure the impossibility of the City’s claim. The total of the newly “optimized” area equals 535 miles or 91% of curb miles. To achieve a 50% increase in pounds of trash and sediment, the City would actually need to cover chronically unswept areas equal to 55-60% or more of the optimized area. *This would equate to 321 miles of unswept street surface, a virtual impossibility in an urban environment.*

To put this in more concrete terms, consider that the average car is 16’4” in length. *The City’s 50% goal would require the weekly presence of 103,346 cars parked in the same spots during each sweeping cycle.* Based on a total population of 147,000 residents, the city would require an unmoved car for 70-80% of the residents in the low impact areas – an implausible expectation under any scenario. All evidence points to the impossibility of the 50% goal, which was posited solely to impress the reviewers with the potential for an extraordinary outcome. Not only is the outcome unknown, but it could be disturbingly low per dollar spent.

**Reference 5 – Cost Understated** -- In the strange world of government accounting, tickets and other fees are not considered to be a cost for taxpayers. However, in the real world, tickets are a “curb tax” that represents a real expense for residents and visitors alike. The City has offered only vague explanations concerning cost, except to say that the program will be “cost neutral.” This is a questionable statement that masks the revenue generating potential of this sweeping/ticket program.

Tickets/Officer Hour	1	2	3	4	5	6
Annual Revenues	\$536,640	\$1,073,280	\$1,609,920	\$2,146,560	\$2,683,200	\$3,219,840

These scenarios show the revenue potential from parking enforcement. To reach the City’s projections, each proposed traffic officer could write only one ticket per hour, an extremely low expectation. More likely, the tickets will yield somewhere between \$1.5 and \$2.0 million in additional revenues, making this program a significant profit center. *There is no scenario in which the program could be considered revenue neutral.* Measured a different way, the incremental improvement in sweeping could run as



much as \$50,000-\$100,000 per actual mile of newly optimized sweeping, an absurd expense that cannot be rationalized.

**Conclusion** – The purpose of this analysis was to complete our examination of the City’s proposed street sweeping ticketing program through a review of the original grant proposal. This review solidified our impression that the City has failed to provide credible evidence of the need or effectiveness of such a program, and has engaged in a pattern of misinformation, obstruction of public involvement, and duplicity in its true intent.

Furthermore, the City has not considered any alternative plans, including novel ideas or those successfully implemented by other municipalities. Parking fines are a stressful and disagreeable imposition on a city’s residents, and the signs that support them are eyesores that never go away. To apply these in a blanket fashion on an entire city, with obvious overtones of self interest, is wrong in every respect. We urge the citizens of Torrance to oppose this implementation to the fullest extent possible.

*Prepared by Torrance Citizens Against Government Waste (6/05/2014)*