

Ticketing to Tonnage Analysis

Prepared for Torrance City Council Discussion

Description: This analysis has been prepared to aid the Torrance City Council in analyzing data prepared by staff concerning street sweeping ticketing as it relates to the disputed “optimized” plan.

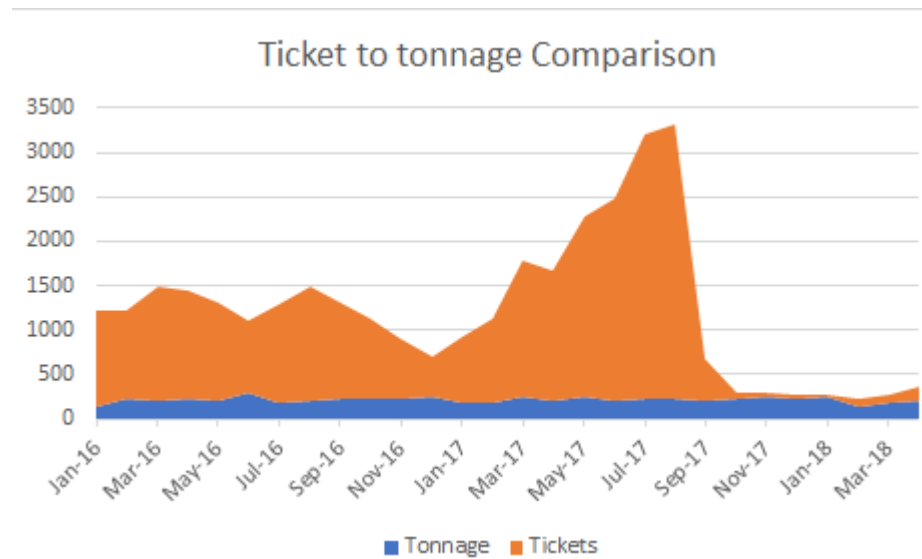
Our Prior Claims: Our research in opposition to this plan claimed the following:

- Ticketing and signage would yield almost no positive outcome in terms of tonnage
- The optimized plan was not mandated and offered little to no incremental improvement
- Any increase in tonnage came from the purchase of more advanced Elgin equipment at the very beginning of the roll-out period
- The City mislead its own citizens regarding the need and potential positive outcomes from the “optimized” program
- The City has withheld information that would allow citizen inquiry into this topic in violation of the California Public Records Act.

Analysis: First, our research group is comprised of experts, including one individual who was an early investor in the street sweeping technology used on the Elgin Street Sweepers. We will start with the last item first. Our group has asked for tonnage by month numbers four times and the City has never managed to provide these figures. We now know why, because historical tonnage does not support the City position at all. In fact, this new data backs all of our conjecture concerning this program.

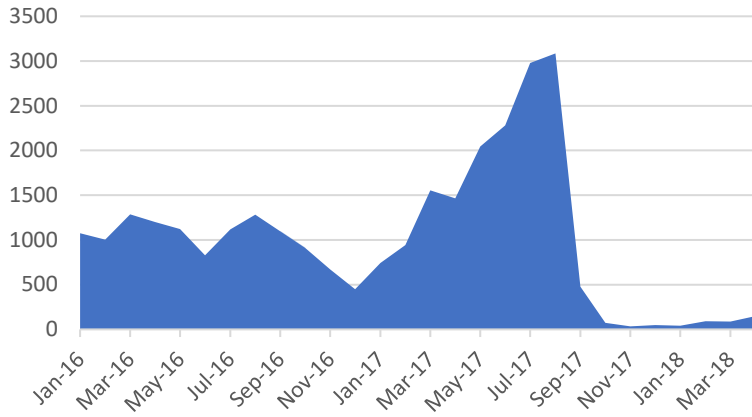
According to the City’s own figures, the “optimized” program has almost no impact on tonnage, and the ticketing has even less.

	Tonnage	Tickets
Jan-16	144	1075
Feb-16	215	1005
Mar-16	206.29	1286
Apr-16	232.94	1201
May-16	196.4	1121
Jun-16	288.43	829
Jul-16	178.96	1119
Aug-16	214.09	1281
Sep-16	219.01	1096
Oct-16	225.81	910
Nov-16	232.58	670
Dec-16	240.46	449
Jan-17	191.13	743
Feb-17	184.64	944
Mar-17	237.94	1556
Apr-17	197.86	1466
May-17	244.62	2045
Jun-17	198.17	2281
Jul-17	218.71	2978
Aug-17	231.72	3085
Sep-17	202.66	478
Oct-17	230.51	74
Nov-17	256.55	33
Dec-17	227.05	47
Jan-18	240.94	41
Feb-18	141.83	91
Mar-18	172.01	88
Apr-18	203.3	148



This ticket to tonnage comparison proves that there is no correlation between ticketing and tonnage. The reason for that is ironic – the City’s old plan was randomized, so that the street sweepers in the low-density areas covered more street surface. **Statistically, the new plan actually sweeps less of each street over a four- to six-week period.** Because rain events are the single most important determinant in storm drain activity, and we have so few rain events, the pre-optimized program was nearly equivalent. The City did zero studies on the program before implementation.

Street Sweeping Tickets



The City provided us with a great test of the relationship between ticketing and tonnage by essentially suspending ticketing for a seven-month period. They also have now provided a clear picture of full-enforcement. We learn two things from this – 1. Ticketing has shown near zero effect on tonnage; and 2. Ticketing was accelerating and will be much higher than projected. **In truth, the City was on track to write over 31,000 street sweeping tickets, which would bring in more than \$1.7M annually (counting late fees).**

MONTHLY CITATIONS ISSUED FOR STREET SWEEPING

	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC	YR TOTAL	AV. PER MONTH
2012	682	604	578	654	532	580	633	633	433	533	505	480	6,983	582
2013	632	405	524	480	470	553	553	553	553	553	553	552	6,937	578
2014	632	520	692	823	582	368	368	368	368	368	368	119	6,813	568
2015	77	1,750	2,288	1,943	1,227	1,804	1,936	1,162	1,122	1,268	1,048	795	16,420	1,368
2016	1,075	1,005	1,286	1,201	1,124	829	1,119	1,281	1,096	910	670	449	12,045	1,004
2017	743	944	1,556	1,466	2,045	2,281	2,978	3,085	478	74	36	47	15,730	1,311
2018	41	91	88	148									368	92

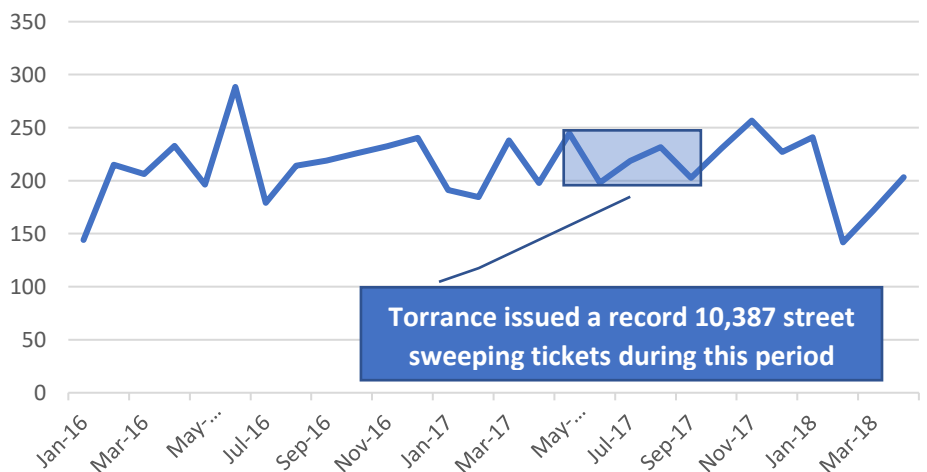
This is the only period with full enforcement.

NOTES: In 2017, starting May 1 to September 14, Parking Enforcement (5 field officers) shifted to enforcing Street Sweeping based on Street Sweeper routes. There are 5 sweepers in the City and each officer was assigned a route Monday-Friday. Starting with September 17 until December 11, due to a need for coverage in the jail, the Parking Enforcement Staff was reduced from 6 Parking Enforcement officers (5 field, 1 office staff) to a total of 3 field officers.

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We now understand why staff would not give us tonnage history, even with four information requests. The tonnage numbers prove that the optimized program has no effect on tonnage.

Tonnage



Torrance issued a record 10,387 street sweeping tickets during this period

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Over the last 28-month period, 8 of the **lowest** 11 tonnage months occurred after the “optimized” program was implemented. Over a sample period spanning more than two years and based on the City’s inflated claims of improvement -- there should have been a consistent measurable improvement in tonnage after the “optimized” program went into effect. These results are consistent with our predictions that this was a badly conceived program with no measurable improvement possible.

The City has created a solution for a problem that did not exist, but it is disingenuous to suggest that without ticketing, the streets of our neighborhoods would somehow revert to some kind of refuse filled back alley status. **Our streets were very clean before this program even existed.**

The table below is a year-over-year comparison of sweeping tonnage collected. Factors that impact the fluctuation in street sweeping tonnage include several factors such as amount of rainfall, wind, tree trimming and the level of parking enforcement.

Parking enforcement has shown no impact.

Due to the installment of “NO PARKING” signs throughout the City, staff believes that residents complied with the no parking signs even with the reduction of parking enforcement officers issuing citations. While this compliance may last for a period of time, signage becomes less effective over time without enforcement. Staff recommends maintaining the current fee of street sweeping/no parking citations at \$43 through December 31, 2019. Staff recommends to return to City Council in January 2020 to review the fee of calendar year 2018.

2,045 2,281 2,978 3,085

If citizens moved their cars without ticketing, then why ticket?

LERROY J. JACKSON
CITY MANAGER

Months	Citation Count			General Ledger Revenue Collections	
	OTHER	STREET SWEEPING	TOTAL	TOTAL \$	
Jul	351	2,978	3,329	\$	(5,643) ***
Aug	511	3,085	3,596	\$	223,854
Sep	503	478	981	\$	(2,230) ****
Oct	573	74	647	\$	49,642
Nov	836	33	869	\$	35,469
Dec	1,596	47	1,643	\$	21,327
Jan	463	41	504	\$	34,499
Feb	454	91	545	\$	17,209
Mar	414	88	502	\$	50,525
Apr	632	148	780	\$	71,465
May	237	59	296	\$	53,432 *
Total	7,637	12,914	20,551	\$	549,549
Budget \$480,000					

Financials Outcome: The revenue collection numbers given to the City Council are designed to make everyone believe that the program is a money-losing, low-value necessity. However, remember that the figures provided here only show two months will full enforcement and one of those months was artificially reduced with a reversal of fees ***. These are “gamed” numbers, and the real general ledger run rate could be in excess of \$1.0 million.

One of the rules of forensic accounting is to look for aberrations in columns that have been manipulated. The column totals do not match the monthly figures in the spreadsheet.

*** Includes a reversal for revenues accrued in June 2017 of \$63,566.

**** Includes payment of court fees for July, August and September 2017.

From: [Cortez, Dana](#)
To: [Barthe-Jones, Eleanor](#)
Subject: Parking - Street Sweeping
Date: Wednesday, October 12, 2016 8:10:00 AM

Hello Eli!

I got your voice and email. How far back are we going when reviewing the revenue? At the end we have very little that we keep from these types of violations that it does not even cover the enforcement costs but I will provide you whatever you need. Just let me know the time period we are reviewing.

Thank you!

Dana Cortez

City Treasurer

City of Torrance

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stewardship*

Conclusion: The City has been talking around the edges of this issue for a very long time, but this new information provides the City Council and citizen groups with a much clearer picture of what full-implementation would look like. But it also reinforces a number of important questions that the City has never answered. We have already proven that Torrance officials grossly exaggerated the threat of fines. The City claims that it does not make money from the ticketing program (see above). The latest figures show that the optimized program has no impact on tonnage. Something does not add up. So, the question has to be asked – ***Why does this program even exist?***

Ticketing should not be reduced, it should be eliminated in the low-density residential neighborhoods.

May 28, 2018