

No Signs, No Fines Committee Special Report

Honorable Mayor and Members
of the City Council
City Hall
Torrance, California

Council Meeting of
August 28, 2018

Comments on the Staff Report Concerning the Optimized Street Sweeping Program

Subject

We have analyzed the most recent City data concerning the Optimized Street Sweeping Ticketing and have discovered a number of errors in the way that ticket averages and costs were compiled. The following findings are in response to the staff report presented to the Council for the August 28, 2018 meeting.

Main Points

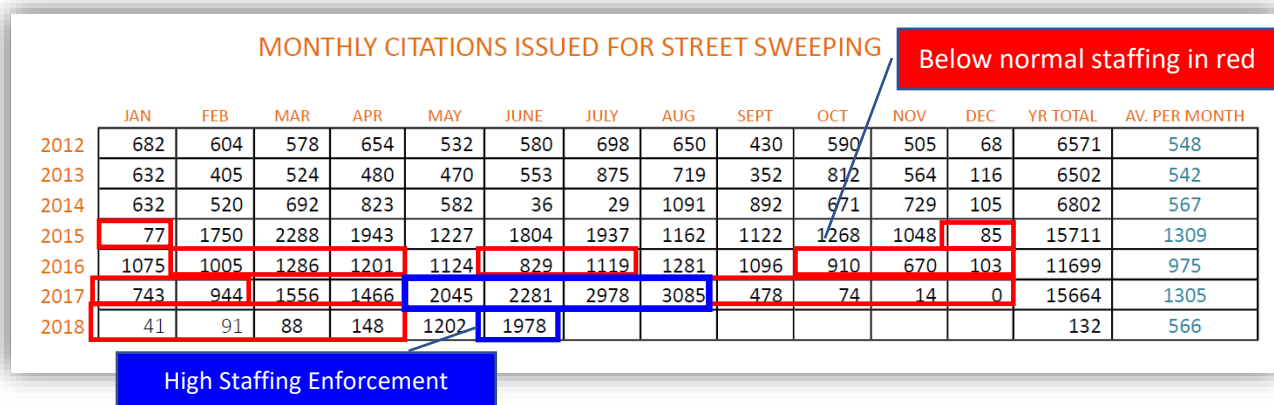
Our analysis shows that the average expected annual ticket totals are significantly understated in the staff report, while staffing costs are overstated.

Background/Analysis

- **The most recent data is flawed concerning ticket averages because it does not rely on a true “average” year**
- **Enforcement of violations has shown a pattern of inconsistency**

ClearSource Averages Do Not Represent an Average Year

The conclusions based on the official data presented to the City Council are not accurate, because ClearSource relies on averages during years in which the Optimized Program was not run in its complete form. ClearSource considers an average year to be 14,206 citations, but that total cannot be used as a predictor of normalized future years for two important reasons: **the years included in the ClearSource average had significant understaffing; and the Optimized Program was not fully implemented during all of the sample months.** The following chart shows that a majority of months were understaffed during the entire life of the Optimized Plan. In those months with normal staffing the ticket totals showed a significant spike of 80-175% over comparable months and more than a 1000% increase over minimally staffed months.



Utilizing normal staffing and enforcement, the number of tickets will skyrocket in the future. **The actual average for those months with near-full implementation and normal ticket writing was**

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2,473 per month or 29,676 tickets per year, but full staffing every month would take that calculation to nearly 36,000 tickets/year. Adjusting downward for some seasonality and normal staffing gaps, it is reasonable to estimate that **real staffing for a full year could yield in excess of 27,000 street sweeping tickets**, almost double the number presented in the two-year average cited in the City Staff report. In addition, the City's prior assessment that ticketing was falling because residents were growing accustomed was not true, because the City was simply under-staffing the ticketing during large segments of both sample years, leading to falsely declining ticket trends. The idea that ticketing will actually be much higher than modeled by ClearSource is backed by this comment from the Chief of Police concerning the 2147% increase in tickets over the three months (ended June 2018) as staffing levels rose.

From: Irvine, Eve
Sent: Monday, July 02, 2018 1:34 PM
To: Chaparyan, Aram <AChaparyan@TorranceCA.gov>; Tsao, Eric <ETSAO@TorranceCA.gov>; Jackson, LeRoy <LJACKSON@TorranceCA.gov>
Subject: FW: Street Sweeping Stats Report - June

Good Afternoon,

These numbers are significant. People are still not following the law.

Just an FYI

Eve R. Irvine
Chief of Police - Torrance Police Department
City of Torrance | 3300 Civic Center Drive | 310.618.5705 voice | eirvine@TorranceCA.gov
www.TorranceCA.gov | www.Twitter.com/TorranceCA

A Major Revenue Producer in an "Average" Year

Although ClearSource attempts to demonstrate that the City is losing money on the Optimized Program, that premise is based on the enforcement cost at 75% staffing, which is far too high compared to the actual staffing during the measurement period. **During every month when staffing actually reached 75%, officers wrote over 2,470 tickets per month, casting further doubt on the City's 14,206-ticket estimate.** But more importantly, the 75% allocation used in the cost analysis is only a "guesstimate" from staff interviews (see below). Actual staffing in 2017 was closer to 44% based on

Police Service Officer Productive Hours

Description	Total	Notes
# of Police Service Officers Providing Parking Enforcement	5.00	
Productive Hours Per Officer	1,791	[a]
Total Productive Hours	8,955	
Allocation to Direct Enforcement of Street Sweeping Regulations	75%	[b]
Street Sweeping Direct E	6,716	
Average Number of Citat	14,206	
Average Hours Per Stree	0.47	

For calendar 2017 actual staffing was only 44%.

Notes:

[a] Source: City timekeeper system.

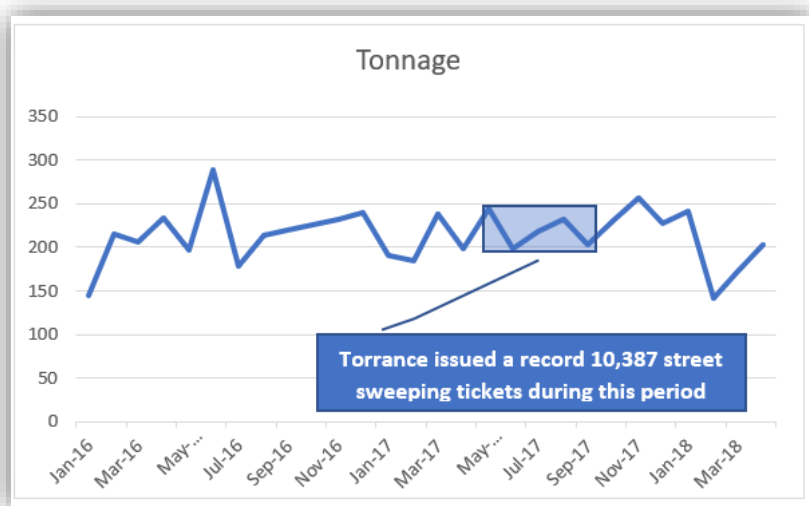
[b] Based on interviews with parking enforcement personnel. Amount may vary from time-to-time depending on resource allocation needs.

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ticketing trends. This is important to know, because it means that the cost figures presented by the City (\$669,858) are 50-70% overstated during the measurement period and rely on a guess rather than actual hours worked. This is a major flaw in the cost analysis because it shows that the program is actually profitable at a much lower threshold than presented. The haphazard staffing over the life of the program is also suspect, given the strong opposition to the Optimized Plan and the City's need for a small impact during a contentious timeframe. Finally, there is no discussion of the cost to the taxpayers, which is in excess of \$2.0 million annually when all parts of this plan are compiled.

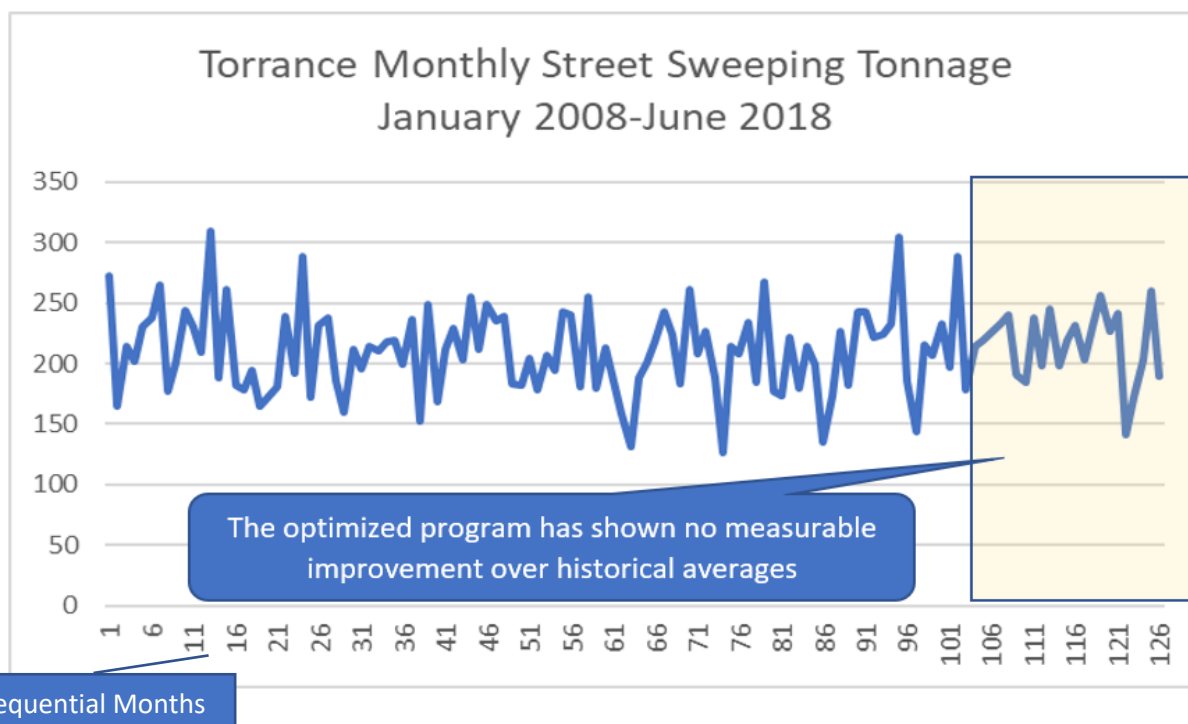
This data leads to some very significant questions:

- Shouldn't the City have studied the cost structure of a program that is one of the most pervasive in City history, before implementing the program?
- The City claims it loses money on the ticketing, but if the program is not mandated and there is no threat of fines, why is the City ticketing at all?
- Why did the City have to hire an outside firm to tell them what they already knew?



We conclude this analysis with two historical charts that prove the ticketing portion of the optimized program has had no positive effect on tonnage, even during aggressive enforcement. We would refer the City Council to our other research to provide an explanation for that unfortunate outcome, along with our recommendations concerning this unnecessary and illegitimate program.

No Signs, No Fines Committee
August 26, 2018



Sequential Months