

----- Original Message -----

Subject:For Garden Grove City Council - red light camera item Aug. 25

Date:Sun, 23 Aug 2015 15:54:14 -0700

From:Jim>

Reply-To:

To:baon@garden-grove.org, stevej@garden-grove.org, kbeard@garden-grove.org,
chrisp@ci.garden-grove.ca.us, phatb@ci.garden-grove.ca.us

CC:denisek@garden-grove.org, cityclerk@ci.garden-grove.ca.us, publicworks@ci.garden-grove.ca.us

(For the City Clerk and Dir. of Public Works: Please route a copy of this letter to each councilmember, to each member of the Traffic Commission, and to the public)

8-23-15

Subject: Proposed Renewal of Red Light Camera Contract - on Aug. 25 Garden Grove Agenda

Honorable Mayor and Councilmembers:

On page 3 of of the staff report is a large table with staff's before-and-after comparison of accidents, intersection-by-intersection. The table shows, *mostly*, dramatic reductions of accidents over the years. Staff evidently counted all accidents regardless of the compass direction the vehicles were moving in, so I decided to re-run the table looking at only the accidents caused by motorists driving in the compass directions enforced by the cameras. The results (see annotated table, attached [at bottom of this thread]) were very different from staff's - some intersections were down, some were up, but only one statistic, the rearenders at Harbor/Trask, moved in a significant way: A drop from 13 to 2 over the years. In an attempt to understand why the rearenders at Harbor/Trask changed so much, I decided to make a year-by-year table of the numbers. That table (attached [at bottom of this thread]) shows that most of the "before" rearenders were in just one year, 2003, which is when the cameras would have been under construction.

Thus, Garden Grove's accident figures show what many other cities have noted (see Candor by Officials, attached), that the cameras have made no significant difference.

The Future

If you decide to continue the program and you are concerned about the financial aspects of the cameras, bargain hard. It's a soft market and the monthly cost to rent a camera has dropped, a lot. Please have another look at the Elk Grove pricing table I sent you in April (see thread below).

There's two reasons to be careful about the amount of rent you agree to pay.

1. As I mentioned in April, Garden Grove will need to issue enough tickets to at least cover the rent, so agreeing to a higher rent is likely to result in more tickets.
2. National standards for yellow light lengths are changing, making it unlikely that the City will be able to issue as many tickets as it does now. For example -

- a. For straight through movements, most states will require longer yellow lights, computed on the basis of the 85th Percentile speed rather than the posted speed. That change went into effect in California on the First of this month. (Your staff mentioned this, briefly, in the middle of page 2 of their report.)
- b. For left turns, there will be longer yellows computed per the correction requested in a recent letter (attached) by Prof. Alexei Maradudin, one of the authorities in the field.
- c. Maradudin's correction will also affect the quantity of right turn violations - as will the tide of public sentiment reflected by Redflex' former president (see thread below).

Food for Thought

If you decide to continue this matter and ask staff to come back at a later date with more information, I hope you will ask them to report about the things I discussed in my April letter, namely, the percentage of visitors, the age of drivers, and confidential registrations.

Sunshine

Finally, a Sunshine request. If normal meeting noticing procedures are followed, any reworked staff report will not be made public until the Thursday evening before the Council meeting at which it will be voted upon, leaving the media and general public with little time to comment and the Council almost no time to read those comments. If you want to have good input from all sides - which is the way to make an informed decision - please publish the staff report and contract at least two weeks before the hearing date.

Sincerely,

Jim

Attachments [at bottom of this thread]

cc: Media

----- Original Message -----

Subject:For Garden Grove City Council - red light camera deadline coming

Date:Tue, 21 Apr 2015 17:48:03 -0700

From:Jim >

Reply-To:jim

To:editor@highwayrobbery.net, baon@garden-grove.org, stevej@garden-grove.org, kbeard@garden-grove.org, chrisp@ci.garden-grove.ca.us, phatb@ci.garden-grove.ca.us

4-21-15

Subject: Upcoming Automatic Extension of Red Light Camera Contract and Opportunity to Negotiate Price

Honorable Mayor and Councilmembers:

In August 2012 the City agreed to a three-year contract, plus two one-year extensions which will occur automatically (unless, 60 days in advance of the expiration dates the City notifies RedFlex of its intent not to extend).

Contract extensions should never be automatic. If Garden Grove does not act by June and thus allows a one-year extension to occur automatically, it will continue to pay \$2279 per camera per month - way too much. For example: In March 2014 the City of Elk Grove, California approved a new contract which specified the following schedule of rents for their five RedFlex cameras.

Years in service	Fixed price not to exceed / Designated Intersection Approach per month
0-4.99	\$4696.00
5.0-6.99	\$4196.00
7.0-9.99	\$2000.00
10.0+	\$1500.00

Imaged from Exh. D of the Elk Grove Contract

By August 2015 all of Garden Grove's cameras will be ten years old or more. If the City continues to pay \$2279, it will pay 52% too much (compared to the Elk Grove price schedule), an extra \$261,744 extra during the potential two years. To cover that extra rent, Garden Grove will need to issue an extra 2618 tickets (assuming that the City receives an average of \$100 for each ticket issued).

Aside from the rent, here are some other things to investigate before extending the contract.

A. The most recent data on the number of tickets issued in Garden Grove shows a surge in ticketing in 2014. Examples: Ticketing during Fall 2014 was the highest since 2005, and for all of 2014 ticketing at Trask/Harbor was 46% higher than in 2013. Shouldn't ticketing go down, over time, not up? (Ticketing data is available at [highwayrobbery \[dot\] net](http://highwayrobbery.net).)

B. If the Council asks staff for a study or presentation, the resulting staff report is likely to include a claim that the cameras have produced a big reduction in accidents over the years. I suggest that the Council should be very skeptical about such crash statistics. A staff report presented to the city council in Ventura last month (copy attached) demonstrated one of the reasons why. (Ventura has had red light cameras since 2000.)

In three prominent places in the written staff report, Ventura's staff claimed a 75% reduction in accidents.

1. In the summary, on page 2.
2. In this table, found on page 4.

Year	Red light collisions	% Change from 2000 CATSS Launch
1998	124	
1999	128	
2000	132	
2001	107	19%
2002	115	13%
2003	100	24%
2004	101	23%
2005	93	30%
2006	92	30%
2007	45	66%
2008	41	69%
2009	40	70%
2010	39	70%
2011	34	74%
2012	38	71%
2013	36	73%
2014	34	75%

Imaged from Ventura staff report for 3-30-15 council meeting

3. In the first Powerpoint slide (part of staff report pdf, attached).

Fortunately, during the meeting Ventura's mayor noticed the dramatic change between 2006 and 2007, and asked staff about it. This was staff's response (at 3:20:20 in the City's online video):

"The way the police department reports collisions now is vastly different than we did when we started this program. Now we only report - correct me if I'm wrong - now we only report injury or major property damage collisions. That's different. Our total collision numbers are down quite a bit because the reporting is different."

In other words, "garbage in, garbage out." If we adjust Ventura's table for the reporting change the PD made back in 2006 - 2007, the result is more like 35 - 40%, not the 75% published. And that occurred against a background of a 20% decline in all injury accidents statewide over the last ten years.

How can the Garden Grove council get better statistics than Ventura did? I recommend that you get the accident stats done by an independent professional with credentials in statistics. Among other things, a professional's report will tell you which changes are statistically significant, and which are not.

If the year-by-year accident reduction figures show that the reduction has flattened out over the last several years - a period during which ticketing has increased - it may be likely that the City is ticketing more and more people each year for technical violations having no relation to safety.

Finally, a claim of a huge reduction in accidents in Garden Grove would also be at odds with

statements by the authorities in more than a dozen other cities, who have reported little or no reduction. (To read their statements, read the "Candor" attachment.)

C. If you ask staff about the percentage of tickets going to visitors to town, most likely you will learn that the huge majority of the tickets are going to visitors. (In the twelve cities discussed in FAQ # 22 on highwayrobbery [dot] net, visitors got between 69% and 98.5% of the tickets.)

That percentage is important because, in an area with high turnover, doing nothing but installing cameras will never stop the running; there's always fresh meat, umm, *new visitors*, making mistakes, being distracted or lost (unless you keep them out of the City by installing a dome, like the one they have in Chester's Mill, Maine). A visitor won't know that there's a camera up ahead, so the presence of a camera won't, by itself, keep him or her from running the light and endangering the other people - mostly local residents, your constituents - who frequent the same intersection.

If a city genuinely wants to minimize running, and accidents, it will do things like the following, to make the problematic intersection stand out, look more important.

1. Put up more visible signal lights (larger diameter, with bigger backboards, with more of them placed on the "near" side of the wider intersections).
2. Paint "signal ahead" on the pavement.
3. Install lighted overhead street signs for the cross street (also placed on the "near" side), and larger bulbs in the streetlights at the intersection.

An example of the "proactive" approach is the engineering work the City of Santa Clarita did during 2014, which dramatically reduced violations there. Details about the changes in Santa Clarita are available at highwayrobbery [dot] net and at [thenewspaper \[dot\] com/news/46/4667 \[dot\] asp](http://thenewspaper.com/news/46/4667) .

Then there is the issue of what to do about right turns. The annual report Redflex filed with the Judicial Council on behalf of the City says that in 2013, 34% of the City's tickets were for rolling right turns. The recent big increase in ticketing at Harbor/Trask (discussed above) suggests that the percentage may be even higher in 2014. I hope you will ask the police for the 2014 figure, as there is a growing cloud over heavy right turn enforcement. Consider this remarkable statement found in a Dec. 26, 2014 Wall Street Journal interview of an industry leader:

"Mr. [James] Saunders [then-president of RedFlex, resignation tendered March 23, 2015] suggests jurisdictions refrain from issuing a [rolling right] ticket except when a pedestrian is in the crosswalk." The headline was, "Can the Red-Light Camera Be Saved? - Money-hungry politicians discredit a hopeful safety innovation." (A Jan. 22, 2015 column in the Dallas Morning News confirmed the statement The Journal had attributed to Saunders: "When I asked Redflex spokeswoman Jody Ryan about her boss' comments urging cities to lighten up on rolling reds, she answered, *"It only makes sense that Jim is going to say, 'Look, we need people to be thoughtful about how they are implementing these programs and how they are issuing citations.' It wasn't that shocking."*)

I submit that if the number and severity of accidents caused by right turns is high and has

not declined despite years of photo enforcement, the City should study its records to determine when during the red phase most of those accidents occur and then install "blank out" signs programmed to light up and prohibit right turns during the high risk period.

D. Please ask staff, or Redflex, to report to you the average age of those ticketed, broken down by camera location and type of movement (straight, left, or right). Age is of interest because those intersections where the age of violators is found to be significantly higher probably need to be made more navigable for older drivers. Sometimes it can be as simple as lengthening the yellow light.

E. A staff report will most likely include a letter submitted by Redflex, in which they will discuss the actions the company has taken since it was alleged that the company spent \$2 million to bribe an official in Chicago. But those allegations have been common knowledge for a year. What is not common knowledge, and in my opinion worse than what may have happened in Chicago, is the extent to which California officials, government employees and their associates have immunized themselves and their families from receiving photo enforcement and toll tickets by exploiting the CVC 1808.4 confidential registration address program. As of 2011, 1.5 million private vehicles in California - about 5% of all registrations - had the confidential registrations. I would like to suggest that you ask staff how many City employees have the confidential registrations, and also ask the staff of the red light camera program to provide regular reports detailing their handling of the red light camera violations made by those enjoying confidential registrations.

Conclusion

During two additional years 15,000 tickets could be issued in Garden Grove, bearing \$7.5 million in fines, so this decision is an important one and should not be made by default (automatic renewal), or in haste. Please schedule a hearing about this, and if you want to have good input from all sides, please publish the staff report at least two weeks before the hearing date.

Sincerely,

Jim

Attachments

cc: Media

Rearenders, all and with injury, year by year, Harbor/Trask int. in Garden Grove, sbd and ebd only.
 Source data: Accident listings published as part of council agenda of 8-25-15
 By Jim, 8-23-15

year	sbd all	sbd injury	ebd all	ebd injury	
2001		2	2	0	0
2		6	2	1	4
3		5	5	5	0
4		4	1	1	1
5		2	0	2	0
6		1	0	3	0
7		3	1	0	1
8		2	1	1	0
9		2	0	0	0
2010		4	1	0	0
1		6	3	0	0
2		2	2	0	0
3		0	0	0	0
4		3	0	0	0

REVIEW OF THE CITY'S PHOTO ENFORCEMENT PROGRAM AT SIGNALIZED INTERSECTIONS BY THE POLICE AND PUBLIC WORKS DEPARTMENTS

August 25, 2015

Page 3

3 Years Before/Most Recent 3 Years Accident Data Summary			
Location	Before	Most Recent	Percent Change
Valley View/Lampson	Broadside 12 3	Broadside 2 0	83% Decrease
	Rear-End 11 1	Rear-End 2 1	82% Decrease
Harbor/Trask	Broadside 11 1	Broadside 5 4	55% Decrease
	Rear-End 22 13	Rear-End 7 2	68% Decrease
Brookhurst/Trask	Broadside 10 3	Broadside 2 4	80% Decrease
	Rear-End 7 2	Rear-End 9 2	29% Increase
Magnolia/Trask	Broadside 8 4	Broadside 3 2	62% Decrease
	Rear-End 4 2	Rear-End 3 1	25% Decrease
Brookhurst/Westminster	Broadside 7 2	Broadside 5 2	29% Decrease
	Rear-End 17 4	Rear-End 9 4	47% Decrease
Brookhurst/Chapman	Broadside 7 1	Broadside 2 3	71% Decrease
	Rear-End 11 2	Rear-End 5 2	55% Decrease
Valley View/Chapman	Broadside 2 3	Broadside 3 1	50% Increase
	Rear-End 4 1	Rear-End 5 1	25% Increase
Brookhurst/Orangewood	Broadside 1 2	Broadside 1 1	0%
	Rear-End 7 1	Rear-End 3 0	57% Decrease

fatal in 2012

Handwritten figures are by [redacted], 8-21-15
Fiscal Analysis *Jim*

The revenues generated by the RLCP strictly come from the fines collected from red light violations. The City receives approximately 30% of the fines collected while the state, county, and the courts receive approximately 70%.