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# PERFORMANCE AUDIT OF THE CITY'S CURB PAINTING PROCESS

Opportunities Exist to Improve the City's  
Internal Control Environment  
Framework Over Curb Painting  
Operations

Office of the  
City Auditor

City of San Diego



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## THE CITY OF SAN DIEGO

February 11, 2018

Honorable Mayor, City Council, and Audit Committee Members  
City of San Diego, California

Transmitted herewith is a performance audit report on the City's Curb Painting Process. This report was conducted in accordance with the City Auditor's Fiscal Year 2018 Audit Work Plan, and the report is presented in accordance with City Charter Section 39.2. The Results in Brief are presented on page 1. Audit Objectives, Scope, and Methodology are presented in Appendix B. Management's responses to our audit recommendations are presented on page 27 of this report.

We would like to thank staff from the Transportation & Storm Water and Streets Division for their assistance and cooperation during this audit. All of their valuable time and efforts spent on providing us information is greatly appreciated. The audit staff members responsible for this audit report are Kevin Christensen and Danielle Knighten.

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## Results in Brief

The Transportation and Storm Water Department (TSW) oversees the City's curb painting operations. Painted curbs are important because they help convey a specific message to drivers where special parking rules must be followed. Painted curbs enhance public safety by providing increased visibility and emergency access. Painted curbs also reserve parking for disabled persons, provide short term parking for customers, and designate passenger and commercial loading zones.

We found that opportunities exist to improve the City's internal controls framework over the curb painting process to help ensure City resources are being utilized effectively and efficiently. We identified the following issues:

TSW, which oversees the City's curb painting operations, has not implemented a comprehensive policy with goals and objectives for curb painting. The current process is primarily to paint curbs based upon requests and complaints rather than a uniform City plan, and the City does not have a maintenance plan to repaint faded curbs.

The City did not have one inventory, an itemized list of current assets, or a catalog of painted curbs in the City. Rather, to perform searches for the City's curb painting records the Department relies on three separate databases which include work orders for completed curb painting requests.

The authority to paint curbs is not housed in one agency in the City but is spread across several City departments and one outside agency. The City does not have a mechanism to readily identify authorized painted curbs and has not developed procedures ensuring appropriate coordination with other City departments and agencies related to painting curbs within the City.

A portion of the curb painting applications submitted by residents are denied by traffic engineers. The applications are rejected because the public is not adequately educated on the criteria that qualifies curbs to be painted.

As a result, the City is not providing the most efficient curb painting services to residents due to increased time spent researching the legality of painted curbs and redundancies in curb painting operations. The inability to maintain painted curbs related to safety for pedestrians and motorists could also potentially result in legal liability for the City.

We made four Recommendations to address these issues. First, we recommended TSW develop a written, comprehensive City curb painting policy and control framework to help ensure City resources are being utilized effectively and efficiently. Second, we recommended TSW establish roles and responsibilities and develop better communication among City departments and outside agencies. Third, we recommended TSW begin developing a City research mechanism or inventory to identify painted curbs within the City's inventory asset management system. Finally, we recommended TSW draft and publish a public friendly set of rules describing the curb painting criteria to reduce application rejections. TSW agreed to implement all of our recommendations.



# Background

City curbs are painted to comply with federal and state laws along with San Diego Municipal Code and City council policies, to enhance the safety of City streets for pedestrians and vehicles, and to limit parking in congested areas. Federal and state laws provide requirements and guidelines to limit parking related to specific areas for public safety and provide parking for physically disabled individuals. It is important for the City to maintain internal controls to provide assurance that curb painting is operated effectively and efficiently.

In accordance with the Office of the City Auditors Fiscal Year (FY) 2018 Work Plan, we conducted a performance audit of City's Curb Painting Process. Specifically, our objectives were to determine if the City initially efficiently paints curbs and then effectively maintains painted curbs.

**City of San Diego  
Painted Curbs Restrict  
Parking and Enhance  
Public Safety**

The criteria, rules, and regulations for curb painting in the City is set forth in the San Diego Municipal Code.<sup>1</sup> Restricting the parking of vehicles preserves the character of city neighborhoods, and benefit the health, safety and welfare of city residents.

***Painted Curbs Restrict  
Parking***

Five colors of paint are used throughout the City to restrict curb parking: white-passenger loading parking, yellow-commercial loading parking, green-short term parking zones, blue-disabled parking, and red-no parking. The white, yellow, and green zones can have time limitations and specific enforcement hours that limit parking. The blue zones reserve parking specifically for use by handicapped individuals governed by federal and state legal requirements. The City can be held liable for any violations of legal requirements related to blue zones. Red zones prohibit parking which can be in response to public safety issues and/or property owner's requests. Additionally, gray paint is used to cover previously painted curbs that should not be painted.

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<sup>1</sup> San Diego Municipal Code Chapter 8, Article 6 Stopping, Standing, Parking of Vehicles and Impound Procedures.

***Red Curbs Promoting Public Safety***

Although all painted curbs can enhance public safety by limiting parking, some red curbs have a direct impact on public safety. Red curbs that limit parking near intersections are painted to provide monitoring visibility of cross traffic and increase pedestrian safety. Red curbs that provide access for emergency vehicles and clearance for large trucks also are directly linked to public safety.

**Curb Painting Authority is Spread Throughout Different Agencies and City Departments**

The authority to paint curbs is not housed in one agency in the City. Rather, there are several City Departments and one outside agency that have the separate authority to paint curbs as shown in Exhibit 1.

***Exhibit 1:***

**Colored Curb Parking Authorities**

<p><b>Transportation and Storm Water Department Responsibilities</b></p>	<p>The City of San Diego approval process for new curb painting resides primarily with Transportation and Storm Water Department (TSW). Specifically, the curb painting duties are divided between TSW's Transportation Engineering Operations Division and TSW's Streets Division. The Transportation Engineering Operations Division approves curb painting requests and sends work orders to Street Division for the actual painting.</p> <p>The functions accomplished by the Divisions include many additional areas of responsibility. Specifically, the Transportation Engineering Operations Division manages the City's transportation network to provide efficient movement of goods, services, and people.</p> <p>TSW's Street Division is responsible for maintaining the City's street network which includes providing maintenance and repair services to all streets and alleys, bridges, guardrails, street lights, traffic signals, pavement markings, traffic control signs, and trees within the right-of-way.</p>
<p><b>Development Services Department</b></p>	<p>The Development Services Department (DSD) provides review, permit, inspection, and enforcement services for development projects in the City. As part of these duties, DSD staff approve painted curbs in conjunction with approving permits for new buildings and other development projects.</p>
<p><b>Public Works Department</b></p>	<p>The City's Public Works Department (PWD) is responsible for overseeing the Capital Improvement Program, the rehabilitation and improvements of various public infrastructure assets. As part of these duties, PWD engineers approve curb painting concurrent with completing capital projects. PWD typically will hire an outside contractor to perform the curb painting work.</p>

<p><b>Economic Development Department</b></p>	<p>The Economic Development Department (EDD) encompasses several divisions that implements economic and community development programs in order to create and sustain a resilient and economically prosperous City. As part of these duties, EDD staff have the authority to approve curb painting for parking districts and prepare work orders for Street Division to execute.</p>
<p><b>Metropolitan Transit System</b></p>	<p>The San Diego Metropolitan Transit System (MTS) is the public transit service provider for Central, South, Northeast and Southeast San Diego. MTS provides bus and rail services including the Light Rail and bus services. To assist in the deployment of operations, MTS staff have authority to approve and paint red curbs associated with bus stops throughout the City.</p>

Source: OCA generated.

**Curb Painting Operations Approval and New Painting of Curbs**

Curb painting requests and applications are generated by resident, businesses, and City employees. Safety-related curb painting requests have no fee. In contrast, non-safety related curb painting requests include a \$277 application fee which are submitted to and received by Traffic Engineering Division staff, who enter the information into the City's EAM System.<sup>2</sup> Once the request is entered, the Traffic Engineering Division staff reviews the request and makes a determination. According to TSW management if the request is not approved, a notification is sent to the requestor explaining why the request was not approved. No fees are collected if the red curbs are related to safety issues and the blue curbs are a requirement for business districts. For other approved requests, Traffic Engineers obtain any required payment from the requestors (residents and businesses). Traffic Engineers also mark the areas to be painted and prepare work orders that are submitted electronically to Street Division. Street Division Traffic Maintenance Supervisors provide work orders for

<sup>2</sup> The Enterprise Asset Management (EAM) San Diego system recently went live for Transportation Engineering Operations and Street Divisions. EAM as designed to replace 32 legacy systems across the Departments of Information Technology, Public Utilities, Public Works and Transportation and Storm Water. The project is expected to transform the way the City plans, prioritizes and delivers maintenance and capital projects. EAM San Diego is expected to improve the way streets, sidewalks, storm drains, water mains, treatment plants, pump stations, and the other assets worked on every day are maintained. The project brings all the information about the assets into one online system providing better information for planning and completing work. EAM San Diego brings real-time data, online updates and paperless reporting for crews in the field. Crews were provided mobile devices to plan their jobs and close service notifications from the field.

painting new curbs to a paint crew. Paint crews complete the approved curb painting and close out the work orders in the EAM San Diego system.

Curb painting requests fall into a number of categories:

Safety

Red Curb	No fee
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Disabled Parking

Blue Curb Residential	Fee
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Blue Curb business/commercial	No fee
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Time-Limit/Restricted use

Yellow Curb	Fee
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White Curb	Fee
------------	-----

Green Curb	Fee
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Residential Driveway Red Clearance

Red Curb	Fee
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***Painted Curb Maintenance***

The City's refresh curb painting maintenance process is primarily reactive. Requests for refreshing faded painted curbs are also generated by residents, businesses and City employees. As requests are received, Street Division supervisors or Public Works Dispatch generate work orders and submit to Traffic Maintenance for completion. The City does not charge for curb paint maintenance requests. Traffic Maintenance Supervisors provide work orders to paint crews. Curb maintenance consists of refreshing paint or removing previously painted curbs. Paint crews complete the approved curb refresh painting and close out the work orders in the EAM San Diego system.

**Curb Painting Funding**

Curb painting operations are funded through the General Fund from fees collected from the non-safety related curb painting applications submitted by residents and businesses.

***San Diego Curb Painting Fees***

The Transportation Engineering Division collects fees for curb painting applications. San Diego charges a \$277 curb painting application review and processing fee for new non-safety related requests to paint curbs received from City businesses and residents. The fees are collected when the request is approved. All requests are reviewed by Transportation Engineering Operations Division's staff and required fees must be collected prior to approving the request and initiating a work order to accomplish the curb painting. The City collected \$46,808 in FY 2016 and \$62,721 in FY 2017 in new curb painting fees. According to Transportation Engineering Operations Division's staff, fees for red curb painting at fire hydrants was suspended in mid-year FY 2017. According to TSW management, the City does not charge fees to repaint faded curbs.

Curb painting fees are recalculated every three years. During FY 2018 Transportation Engineering Operations Division prepared user fee cost recovery amounts for FY 2019 - 2021. The amounts dropped from \$316 to \$277 in FY 2019.<sup>3</sup>

***San Diego Parking Enforcement***

The San Diego Police Department's Parking Enforcement Division enforces the parking restrictions generated by painted curbs. There are 13 separate violations related to painted curbs that are enforced through citations.

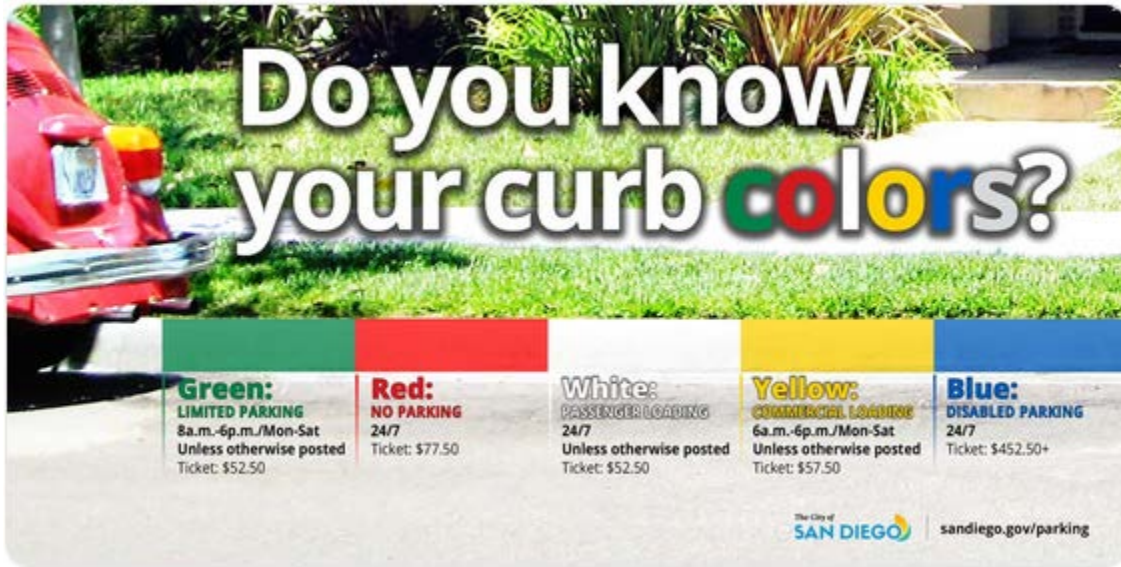
The City Treasurer's Office collects the fines for parking violation tickets including the ones for painted curbs. The fines related to those violations ranged from \$52.50 to \$452.50 as indicated in **Exhibit 2**. The highest parking violation fine is related to disabled parking.

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<sup>3</sup> The amounts include a \$155.42 direct labor and fringe charge along with indirect charges of \$121.86 for a total of \$277.28. The new fee took effect for FY 2019 to FY 2021. Maintaining the curb paint over time was not included in the fees charges for new curb painting.

**Exhibit 2:**

**Curb Violation Fines**



Source: City of San Diego Twitter Account<sup>4</sup>

During FY 2017, the City of San Diego issued 61,055 citations related to painted curb parking violations and subsequently collected \$4,766,184 including a CA state surcharge of \$12.50 that is mandated to be collected by the City per citation for the State.

<sup>4</sup> City of San Diego Twitter Account at: <https://twitter.com/cityofsandiego/status/1020375636525789184>  
(Last visited: December 19, 2018)

# Audit Results

## ***Finding 1: San Diego Needs to Develop a Comprehensive Policy to Standardize and Manage Painted Curbs***

Painted curbs throughout the City are important because they restrict parking while enhancing public safety by providing increased visibility and emergency access. Painted curbs also provide additional benefits including reserving parking for disabled persons, providing short term parking for customers, and restricting parking for passenger and commercial loading zones.

Based on our audit, we found that the Transportation and Storm Water Department has not implemented a comprehensive policy with goals and objectives for the City's painted curbs. The current process is primarily to paint curbs based upon requests and complaints rather than a uniform City plan, and the City does not have a maintenance plan to repaint faded curbs. Also, the City does not have a mechanism to readily identify authorized painted curbs and has not developed procedures ensuring appropriate coordination with other City departments and the San Diego Metropolitan Transit System (MTS) related to painting curbs within the City. As a result, the City is not providing the most efficient service to residents and could be held liable for not maintaining painted curbs related to safety for pedestrians and motorists.

### **What We Found**      Curb Painting Lacks a Sufficient Control Environment to Ensure that Operations are Performed Effectively and Efficiently

The lack of a sufficient internal control environment over the curb painting process results in potential inefficiencies for three main reasons. First, curb painting operations are primarily complaint driven and not proactive, leading to the potential that curb painting crews are not operating as efficiently as possible. Second, there is no comprehensive policy providing a systematic curb painting plan to organize and efficiently deploy curb painting teams to focus on specific geographic areas to reduce duplication of efforts. Third, there is no centralized inventory of curbs leading leaving the City susceptible to illegally painted curbs and time associated with research and curing these issues.

**Lack of New Curb  
Painting Plans**

Currently there is not a comprehensive maintenance program to paint new curbs or periodically refresh faded curbs throughout the City. This lack of planning results in inefficiencies including work crews' duplication of effort and unnecessary travel. These issues are exacerbated by the fact that curb painting is request based service and that criteria for painting curbs has expanded. Finally, the inability to maintain the painted curbs results in the loss of revenue because parking citations cannot be enforced.

The Street Division paint crew paints new curbs and refreshes faded curbs based upon requests from City employee, resident, or business complaints. According to TSW, the new requests are made to Traffic Engineering which forwards the request to Street Division. The requests to re-paint curbs are routed directly to the Street Division.

Management currently does not attempt to identify curbs in need of re-painting adjacent to curbs subject of work orders in order to proactively address current and future curb painting needs. Rather, work orders are issued to street crews daily on an "as received" basis to paint one specified section of a curb identified by the request. As a result, curb painting field staff stated that crews are returning to the same area repeatedly across the City which likely reduces the amount of work crews can accomplish. This repetition can carry extra cost as the City repainted 302,342 linear feet or 57.3 miles of curbs in 2017, according to Transportation and Storm Water Department's records.

Going to the same area repeatedly reduces the amount of work City employees can accomplish. For example, 1,055 feet of curb was repainted on one shift driving to 10 locations with an estimated travel time of almost 2 hours. The travel time included driving over 60 miles without considering any traffic delays. The amount of feet painted could be increased if the locations were within one geographical area of the City simply by reducing travel time.



Staff also noted they were sent to refresh curbs that may no longer be required and pointed out other areas where they had been directed to repaint a curb and subsequently sent to the same geographic area within a short period of time to repaint other nearby faded curbs due to complaints received. For example, Street Division personnel repainted 814 feet of faded red curb that was along both sides of Town Center Drive near Excalibur Way but the faded adjoining yellow curb was not painted as shown in **Exhibit 3**.

***Exhibit 3:***

**Example of Adjoining Faded Yellow and Red Curb on Town Center Drive**



Source: Google Maps image 2018.

Notably, the Department did not have data readily available to determine the number of painted curbs that are adjacent to or abut curbs painted for another purpose. However, as stated above, field staff indicated that repetition of field visits to the same location is a problem.

Additionally, Parking Enforcement Division's personnel confirmed that faded curbs have prevented enforcement of the parking restrictions. During FY 2017, the City of San Diego dismissed 694 or about one percent of parking citations related to painted curbs for a variety of reasons. Department personnel do report faded curbs that prevent issuing citations using the Street Division's website email address or the "get it done" application.

**Half of Complaints for Curbs are Not Approved Resulting in No Fee Collection**

Traffic Engineering Operations Division approves less than half of the complaints, requests, and applications for new painted curbs that are received from the public. Since the fees are not collected until the requests are approved, the staff are spending similar amounts of time reviewing requests that are not approved without collecting a fee as on approved requests with the fee. TSW management stressed that a portion of these requests are not-fee-based. As a result, a portion of the rejected applications would not affect fee generation.<sup>5</sup>

Traffic Engineering Operations Division's staff stated that most of those unapproved requests resulted from inappropriate expectations by the public or the requests were withdrawn when requestor was faced with paying the City fee.

**Lack of Inventory of Painted Curbs**

At the time of the audit, the City did not have one inventory, an itemized list of current assets, or a catalog of painted curbs in the City. Rather, to perform searches for the City's curb painting records the Department relies on three separate databases which include work orders for completed curb painting requests. In other words, when TSW staff is required to search whether a curb has been legally painted, instead of looking at one inventory, the staff member must run queries in three separate City databases. Without an inventory traffic engineers spend more time than necessary reaching whether a painted curb was completed by the City, was painted by another City department or agency, or was painted illegally. Collecting curb painting inventory data in the EAM System on a going forward basis would eventually alleviate time constraints related to future curb painting research.

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<sup>5</sup> The data provided by the Department did not distinguish fee and non-fee-based requests. As a result, we were unable to distinguish fee-based and non-fee-based requests in order to identify a monetary value for unapproved requests.

**Identifying Authorized Painted Curbs**

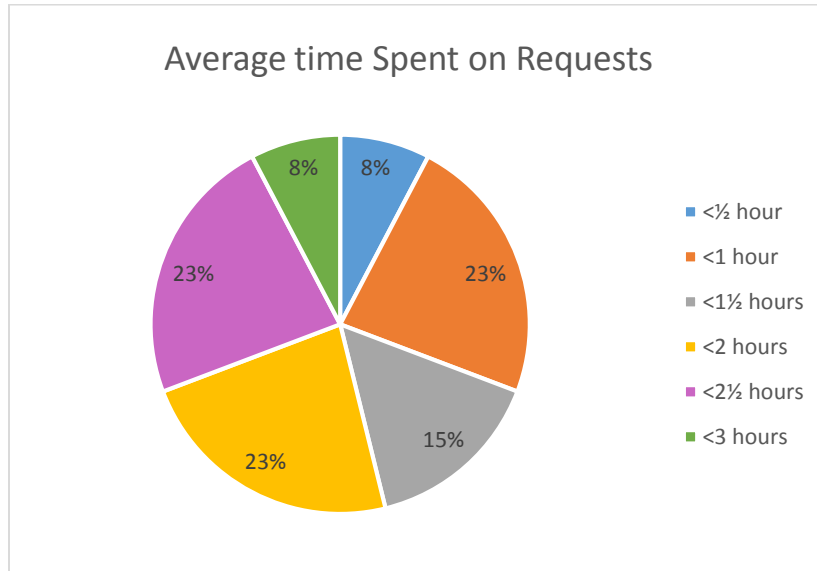
Currently, traffic engineers research work order databases to determine whether specific painted curbs were authorized because there is no City inventory.

Traffic Engineers stated approximately 600 requests are researched annually to determine if painted curbs were approved. However, the department did not maintain specific records on time spent researching approval of painted curbs.

Due to the lack of data collected, during the audit we asked Traffic Engineers to record the time required to research thirteen pending curb requests that involved that type of research. City traffic engineers estimate that it routinely takes anywhere from ½ hours to 2.5 hours to research whether a painted curb was approved by the City or the Metropolitan Transit System. Based on estimates provided by TSW, more than 69 percent of the requests took more than 1.5 hours to research as shown in **Exhibit 4**.

***Exhibit 4:***

**Time Estimate of Autohoization Research Process**



Source: OCA generated based upon Traffic Engineer estimates, developed because specific timeframes for researching approval of painted curbs are not captured in City records.

Engineers estimate the most time spent was almost 3 hours and the least amount of time spent was 16 minutes. The traffic engineers reported occasional instances have occurred where up to 20 hours of staff time may be expended.

Research conducted by traffic engineers during the audit revealed that approvals for 5 of 13 curbs reviewed could not be located and could have been illegally painted. Without a mechanism to readily identify painted curbs authorized by the City or the Metropolitan Transit System such as an inventory, traffic engineers potentially waste many hours of research time that could be utilized for other Division responsibilities.

**Why This Occurred**

Management and Staff Direct Resources to Other Department Responsibilities that are More Vital to Public Safety

Transportation and Storm Water Department's Management stated that many competing and high priority responsibilities prevent the allocation of sufficient resources to develop a comprehensive curb painting plan and inventory.

**Comprehensive Policy and Inventory**

The Department Deputy Director confirmed that Transportation and Storm Water Department's staff had not developed a comprehensive City policy for curb painting because staff had focused on higher priority issues and budget constraints within the Department.

As stated in the background section, Transportation Engineering Operations Division manages the City's transportation network to provide efficient movement of goods, services, and people. This includes monitoring, as well as making capital and operational changes to improve traffic flow and safety for motorists, pedestrians, and cyclists. The Street Division, meanwhile, is responsible for maintaining the City's street network which includes providing maintenance and repair services to all streets and alleys, bridges, guardrails, street lights, traffic signals, pavement markings, traffic control signs, and trees within the right-of-way.

The Street Division managers chose not to implement a painted curb maintenance program in order to prioritize other higher public safety maintenance work, such as pot holes and street light repairs. In fact, managers stated that even if additional general fund resources become available they would address the high priority issues instead of painted curb maintenance.

Additionally, several long-time employees stated that a proactive program to maintain painted curbs was eliminated due to budget constraints and other priorities since the mid-nineteen nineties.

**Traffic Engineering is not Posting Curb Painting Criteria Leading to Improper Applications**

The Traffic Engineering Operations Division standard target is to complete approval process on requests within 90 days of receipt. If Traffic Engineering Operations Division published the guidelines and timeframes for addressing painted curb requests to educate the public, the number of unapproved requests could potentially be reduced.

**What Should Have Occurred**

The Department Should Design and Implement a Sufficient Internal Control Environment including Creating a Plan and Maintaining Adequate Records.

The City curb painting policy should include guidelines that incorporate federal, state, and City requirements.<sup>6</sup> The policy should also include strategic planning and establish responsibilities with performance expectations. Also, an effective internal control system needs to be developed and implemented to ensure resources are being utilized effectively and efficiently.

**Rationale for Creating a Comprehensive Policy**

The Government Finance Officers Association (GFOA) recommends that all governmental entities use some form of strategic planning to provide a long-term perspective for service delivery and budgeting, thus establishing logical links between authorized spending and broad organizational goals. GFOA recommends all organizations identify, track, and communicate performance measures to monitor financial and budgetary status, service delivery, program outcomes, and community conditions. The measures should be useful, relevant, reliable, adequate, collectible, consistent, and clearly identify responsibilities. GFOA recommends that local governments establish maintenance plans for assets prioritized in accordance with overall goals and objectives to maintain expected service levels. The Association also supports the use of fees as a method of financing governmental goods and services.

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<sup>6</sup> The California Vehicle Code; along with San Diego Municipal Code Chapter 8, Article 6 Stopping, Standing, Parking of Vehicles and Impound Procedures; and five current Council Policies provide guidelines for Transportation and Storm Water Department managers to establish City policy for painted curbs. Red painted curb authorizations are based on the California Vehicle Code and the City Red Curb Intersection Visibility Worksheet. Blue painted curbs are based on federal guidelines and on Council Policy 500-08 and white painted curbs are based on Council Policy 200-15. Yellow and green painted curbs are based upon Council Policy 200-04. Additionally, Council Policy 100-18 applies to community parking districts and Council policy 700-16 applies to off street vehicle parking districts.

**Proactive Policy  
Planning Options**

An enhanced policy should strive to proactively address the extent of painted curbs such as when, where, and by whom curbs should be painted and maintained throughout the City. Without an enhanced policy, current practices allow more curbs to be painted and subsequently not maintained throughout the City because many curbs are painted based upon requests and complaints rather than a uniform City plan. While the implementation of such an enhanced policy represents an increased level of service for curb painting and operations with corresponding increases in costs, the proactive maintenance practices would likely lead to a reduction in redundancy for work crews and greater efficiency.

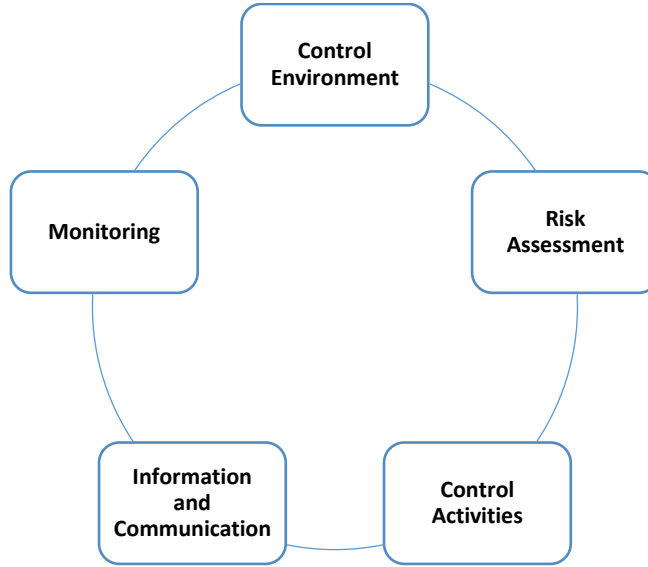
The City plans for curb painting should consider either decreasing painted curbs throughout the City utilizing only current resources and focus primarily on red curbs promoting public safety or increasing the resources provided for the current locations and any expansion of the program. The policy should be specific to curb painting operations to establish goals and objectives, evaluate and mitigate negative effects of not proactively addressing curb painting issues by geographic areas, and provide guidelines and metrics for authorizing and maintaining painted curbs.

**Internal Control  
Framework**

An effective internal control system has five components that work to support the organization's mission, strategies and related business objectives-the control environment, risk assessment, control activities, information and communication, and monitoring-which support continuous evaluation and improvement. Without a comprehensive City plan the first component of the framework – the control environment – is missing. With the control environment missing over the curb painting process, there is no foundation for conducting regular risk assessments, modifying control activities, or monitoring the process. A sound foundation of internal control can be accomplished through directed leadership and an emphasis on accountability. This framework is summarized in **Exhibit 5**.

**Exhibit 5:**

**Five Components of Internal Control**



Source: Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Development of Control Activities Based Upon Risk Assessment Options**

To ensure the internal controls are designed properly, a risk assessment should be conducted to identify the risks that threaten the goals developed for the curb painting process. Once those controls are designed, periodic monitoring is necessary to demonstrate the controls are functioning as intended and risks are mitigated. This audit identified risks related to lack of a research mechanism for authorized painted curbs, a comprehensive maintenance plan, public expectations related to requests, continued public interest in illegally painted curbs, and efficiency and effectiveness of curb painting outcomes as follows.

**Inventory Adds Comprehensive Research Mechanism Value**

A comprehensive research mechanism or inventory for authorized painted curbs would greatly increase efficiency by making that information readily available to City employees authorized to access the system. Although Street Division is the asset manager for painted curbs, the Division does not have access to information related to curbs painted by other entities. Transportation and Storm Water Department needs to obtain curb painting authorizations from the other City departments and the Metropolitan Transit System to establish or maintain a comprehensive inventory. Consequently, City controls need to be established to address these issues before developing an inventory plan or research mechanism.

However, before beginning to create an inventory, Traffic Engineering Operations Division must establish procedures to receive all approved painted curbs authorized by other City departments (Development Service, Public Works, and Economic Development) and the Metropolitan Transit System. Traffic Engineers stated that these approvals are not always provided to the Traffic Engineering Operations Division. Since creating a retroactive inventory can be expensive for a program with limited resources, the City could choose to create an inventory over time based on approvals of new painted curbs and other curb painting evaluations conducted by Traffic Engineering Operations Division.

**Impact of Not Taking Action**

Department will Spend Curb Painting Resources Inefficiently and Ineffectively

Without comprehensive curb painting plans, the Transportation and Storm Water Department has not developed an internal control framework that ensures resources are being utilized effectively and efficiently. Authorized painted curbs are not readily identifiable throughout the City because an inventory has not been developed. Also, complete coordination has not been accomplished with other City departments and the Metropolitan Transit System that can authorize and have some curbs painted.

A comprehensive research mechanism or inventory could also be used to help develop a painted curb maintenance program. Some curbs are painted red to provide motorists increased visibility of other motorists and pedestrians at intersections and when those curbs become faded the City could be exposed to additional liability.

The Traffic Engineering Operations Division expanded reviewing and potentially approving requests throughout the City to better serve complaints from all communities of the City. This expansion did not significantly affect Traffic Engineering Operations funding because the Division receives fees from San Diego residents and businesses that request approved painted curbs. However, we identified that expanding the painted curbs throughout the City does have a negative effect on Street Division funding because the Division does not receive supplemental funding for maintaining the painted curbs. Curbs are also maintained based upon requests and complaints rather than more cost-efficiently through planned and proactive maintenance intervals by geographic location.



**Recommendation #1:**

We recommend the Director of the Transportation and Storm Water Department develop a written, comprehensive City curb painting policy and control framework to help ensure City resources are being utilized effectively and efficiently. The policy should at a minimum include:

- Goals and objectives of the City specific to the City's curb painting process and operations, and establish performance metrics to evaluate whether those curb painting goals and objectives are being met;
- Evaluate methods to optimize curb painting operations - such as addressing similar faded curb conditions within the immediate geographic area - if the process continues to be based primarily on requests and complaints;
- Expanding guidelines for Transportation Engineering Operation Division's determinations for authorizing painted curbs;
- Guidelines for Street Division's maintenance of painted curbs including red curbs painted to provide public safety; and
- A process to monitor the implemented policy and make any appropriate adjustments to meet the goals and objectives of the Division.

Once the policy is established, inform Department staff of the policy through training opportunities for consistent implementation. (Priority 2)

**Recommendation #2:**

To help ensure the public understands what is required from them when submitting a request and to reduce the amount time staff spends on requests that do not meet the qualifications for approval, we recommend the Director of the Transportation and Storm Water Department should require Transportation Engineering Operations and Street Divisions to author and publish written summaries of the City policy for curb painting for the public to better understand and utilize the City curb painting services. (Priority 2)

**Recommendation #3:** To establish roles and responsibilities and develop better communication among City departments and outside agencies to help operations perform more efficiently and effectively, we recommend the Director of the Transportation and Storm Water Department require Transportation Engineering Operations Division to develop and coordinate written agreements with Economic Development Department, Development Services Department, and the San Diego Metropolitan Transit System to share more information and ensure that City records accurately reflect curb painting approved by those organizations. (Priority 2)

**Recommendation #4:** To increase efficiency by making information readily available, we recommend the Director of the Transportation and Storm Water Department should require Street Division in conjunction with Transportation Engineering Operations Division to begin developing a City research mechanism or inventory to identify painted curbs within the City's inventory asset management system. The mechanism should at a minimum make reliable records available to Traffic Engineers. (Priority 2)

# Conclusion

Painted curbs throughout the City are important because they restrict parking while enhancing public safety by providing increased visibility and emergency access. Painted curbs also provide additional benefits including reserving parking for disabled persons, providing short term parking for customers, and restricting parking for passenger and commercial loading zones.

We made a total of four recommendation to improve the Transportation and Storm Water Department's (TSW) curb painting operations. These recommendations are aimed at developing a more proactive City curb painting policy and control framework, and increasing communication with City departments and outside agencies.

First, we found that TSW has not implemented a comprehensive policy with goals and objectives for curb painting. We recommended they develop a written, comprehensive City curb painting policy and control framework to help ensure City resources are being utilized effectively and efficiently.

Second, the City did not have one inventory, an itemized list of current assets, or a catalog of painted curbs in the City. We recommended TSW begin developing a City research mechanism or inventory to more quickly identify authorized painted curbs within the City's inventory asset management system.

Third, we found authority to paint curbs is not housed in one agency in the City but is spread across several City departments and one outside agency. The City does not have a mechanism to readily identify authorized painted curbs and has not developed procedures ensuring appropriate coordination. We recommended TSW establish roles and responsibilities and develop better communication among City departments and outside agencies.

Fourth, we found that many requests submitted to paint curbs are denied by traffic engineers. We recommended TSW author and publish written summaries of the City policy for curb painting for the public to better understand and utilize the City curb painting services.

# Recommendations

**Recommendation #1:**

We recommend the Director of the Transportation and Storm Water Department develop a written, comprehensive City curb painting policy and control framework to help ensure City resources are being utilized effectively and efficiently. The policy should at a minimum include:

- Goals and objectives of the City specific to the City's curb painting process and operations, and establish performance metrics to evaluate whether those curb painting goals and objectives are being met;
- Evaluate methods to optimize curb painting operations - such as addressing similar faded curb conditions within the immediate geographic area - if the process continues to be based primarily on requests and complaints;
- Expanding guidelines for Transportation Engineering Operation Division's determinations for authorizing painted curbs;
- Guidelines for Street Division's maintenance of painted curbs including red curbs painted to provide public safety; and
- A process to monitor the implemented policy and make any appropriate adjustments to meet the goals and objectives of the Division.

Once the policy is established, inform Department staff of the policy through training opportunities for consistent implementation. (Priority 2)

**Recommendation #2:**

To help ensure the public understands what is required from them when submitting a request and to reduce the amount time staff spends on requests that do not meet the qualifications for approval, we recommend the Director of the Transportation and Storm Water Department should require Transportation Engineering Operations and Street Divisions to author and publish written summaries of the City policy for curb painting for the public to better understand and utilize the City curb painting services. (Priority 2)

**Recommendation #3:** To establish roles and responsibilities and develop better communication among City departments and outside agencies to help operations perform more efficiently and effectively, we recommend the Director of the Transportation and Storm Water Department require Transportation Engineering Operations Division to develop and coordinate written agreements with Economic Development Department, Development Services Department, and the San Diego Metropolitan Transit System to share more information and ensure that City records accurately reflect curb painting approved by those organizations. (Priority 2)

**Recommendation #4:** To increase efficiency by making information readily available, we recommend the Director of the Transportation and Storm Water Department should require Street Division in conjunction with Transportation Engineering Operations Division to begin developing a City research mechanism or inventory to identify painted curbs within the City's inventory asset management system. The mechanism should at a minimum make reliable records available to Traffic Engineers. (Priority 2)

# Appendix A: Definition of Audit Recommendation Priorities

## DEFINITIONS OF PRIORITY 1, 2, AND 3 AUDIT RECOMMENDATIONS

The Office of the City Auditor maintains a priority classification scheme for audit recommendations based on the importance of each recommendation to the City, as described in the table below. While the City Auditor is responsible for providing a priority classification for recommendations, it is the City Administration's responsibility to establish a target date to implement each recommendation taking into consideration its priority. The City Auditor requests that target dates be included in the Administration's official response to the audit findings and recommendations.

Priority Class <sup>7</sup>	Description
1	<p>Fraud or serious violations are being committed.</p> <p>Significant fiscal and/or equivalent non-fiscal losses are occurring.</p> <p>Costly and/or detrimental operational inefficiencies are taking place.</p> <p>A significant internal control weakness has been identified.</p>
2	<p>The potential for incurring significant fiscal and/or equivalent non-fiscal losses exists.</p> <p>The potential for costly and/or detrimental operational inefficiencies exists.</p> <p>The potential for strengthening or improving internal controls exists.</p>
3	<p>Operation or administrative process will be improved.</p>

<sup>7</sup> The City Auditor is responsible for assigning audit recommendation priority class numbers. A recommendation which clearly fits the description for more than one priority class shall be assigned the higher priority.

# Appendix B: Objectives, Scope, and Methodology

**Objectives** In accordance with the City of San Diego (City) Auditor's FY 2018 Work Plan, we conducted a performance audit of the City's Curb Painting Process. Overall Objective: Access whether the City effectively and efficiently manages curb painting. The specific objectives were to:

- Determine if the City initially paints curbs efficiently; and
- Determine if the City effectively maintains painted curbs.

**Scope and Methodology** To achieve our audit objectives, we interviewed City staff and management from various departments to determine their roles and responsibilities. We also reviewed City records related to curb painting.

To determine the City's internal controls related to authorizing curb painting, we identified organizations authorized to approve curb painting within the City and evaluated the requirements for these organizations to provide information to Transportation and Storm Water Department.

Transportation and Storm Water Department information related to service notifications and work orders related to curb painting was reviewed. To access the completion of work orders, we accompanied and interviewed crews accomplishing paint operations to identify their concerns and potential efficiencies. We also interviewed traffic engineers to identify their concerns related to the processes and potential efficiencies.

Interviews were conducted with Parking Enforcement and Treasury staff to identify the enforcement issues and collection of fines related to painted curbs citations. Data related to fines collected was obtained for evaluation.

Observed initial analysis of the painted curb and reviewed analysis related to excessive painted curbs. Conducted interviews with traffic engineers to obtain understanding of the analysis.

We conducted this performance audit in accordance with the Generally Accepted Government Auditing Standards. These standards require that we plan and perform audits to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objectives.





THE CITY OF SAN DIEGO

**M E M O R A N D U M**

DATE: February 8, 2019  
TO: Kyle Elser, Interim City Auditor  
FROM: Kris McFadden, Director, Transportation & Storm Water Department  
SUBJECT: Management Response to Audit of the Curb Painting Process/Program

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The purpose of this memorandum is to provide Management's response to the Audit Report titled "Performance Audit of the Transportation & Storm Water Department's Curb Painting Program/Process." The Audit's primary objectives were to:

- Objective 1: Determine if the City effectively maintains painted curbs.
- Objective 2: Determine if the City initially paints curbs efficiently.

The Audit Report provided recommendations to improve the effectiveness and efficiency of the City's Curb Painting Program. Below are the Department's responses to the Audit Recommendations.

**Recommendation #1:** We recommend the Director of the Transportation & Storm Water Department develop a written, comprehensive City curb painting policy and control framework to help ensure City resources are being utilized effectively and efficiently. The policy should at a minimum include:

- Goals and objectives of the City specific to the City's curb painting process and operations, and establish performance metrics to evaluate whether those curb painting goals and objectives are being met;
- Evaluate methods to optimize curb painting operations - such as addressing similar faded curb conditions within the immediate geographic area - if the process continues to be based primarily on requests and complaints;
- Expanding guidelines for Transportation Engineering Operation Division's determinations for authorizing painted curbs;
- Guidelines for Street Division's maintenance of painted curbs including red curbs painted to provide public safety;
- A process to monitor the implemented policy and make any appropriate adjustments to meet the goals and objectives of the Division.

Once the policy is established, inform Department staff of the policy through training opportunities for consistent implementation. (Priority 2)

**Management Response:** Management agrees with this recommendation. The Director of the Transportation & Storm Water Department (Director) will direct staff to document all existing formal and informal policies and procedures and establish a comprehensive City

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Kyle Elser, Interim City Auditor

February 8, 2019

curb policy and control framework. Once established, training will be held with all impacted staff to ensure awareness and consistent implementation of the comprehensive policy.

**Target Implementation Date: December 2019.**

**Recommendation #2:** To help ensure the public understands what is required from them when submitting a request and to reduce the amount time staff spends on requests that do not meet the qualifications for approval, we recommend the Director of the Transportation & Storm Water Department should require Transportation Engineering Operations and Street Divisions to author and publish written summaries of the City policy for curb painting for the public to better understand and utilize the City curb painting services. (Priority 2)

**Management Response:** Management agrees with this recommendation. Once a comprehensive policy is established, the Transportation & Storm Water Department will publish and post the policy on the City's website. **Target Implementation Date: December 2019.**

**Recommendation #3:** To establish roles and responsibilities and develop better communication among City departments and outside agencies to help operations perform more efficiently and effectively, we recommend the Director of the Transportation & Storm Water Department require Transportation Engineering Operations Division to develop and coordinate written agreements with the Economic Development Department, Development Services Department, and the San Diego Metropolitan Transit System to share more information and ensure that City records accurately reflect curb painting approved by those organizations. (Priority 2)

**Management Response:** Management agrees with this recommendation. Transportation Engineering Operations (TEO) Division will coordinate with the appropriate stakeholders to develop a Memorandum of Understanding (MOU) that codifies the proper processes related to permitting, painting, and information exchange to ensure the stakeholders are in alignment and curb painting records are accurately maintained. **Target Implementation: June 2020.**

**Recommendation #4:** To increase efficiency by making information readily available, we recommend the Director of the Transportation & Storm Water Department should require Street Division in conjunction with Transportation Engineering Operations Division to begin developing a City research mechanism or inventory to identify painted curbs within the City's inventory asset management system. The mechanism should at a minimum make reliable records available to Traffic Engineers. (Priority 2)

**Management Response:** Management agrees with this recommendation. TEO will formally document the process associated with researching and/or updating painted curbs in the City's asset management system and ensure this curb research process/mechanism is available to all Traffic Engineers. **Target Implementation: December 2019.**

If there are any questions in this matter, please contact me at (619) 236-6594.



Kris McFadden

Director, Transportation & Storm Water Department

cc: Kris Michell, Chief Operating Officer  
Andrea Tevlin, Independent Budget Analyst

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Kyle Elser, Interim City Auditor

February 8, 2019

Stacey LoMedico, Assistant Chief Operating Officer  
Ron Villa, Acting Assistant Chief Operating Officer  
Johnnie Perkins, Deputy Chief Operating Officer, Infrastructure/Public Works  
Lee Friedman, Infrastructure Policy Manager, Office of the Mayor  
Gene Matter, Assistant Director, Transportation & Storm Water Department  
Kristy Reeser, Deputy Director, Transportation & Storm Water Department  
Duncan Hughes, Deputy Director, Transportation & Storm Water Department  
Nathan Patterson, Deputy Director, Transportation & Storm Water Department  
Juan Aguirre, Program Manager, Transportation & Storm Water Department  
Gary Pence, Senior Civil Engineer, Transportation & Storm Water Department