

**New Rochelle Policing Review Committee Report**

*Initial Report Submitted on November 4, 2020*

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## SUMMARY

Transparency and trust, these two words were repeated throughout the New Rochelle Policing Review Committee's ("committee") meetings and at each of the community input meetings. This report provides the committee's recommendations for ways the New Rochelle Police Department ("NRPD") can improve transparency and trust with the community it is charged to serve and protect.

The committee would be remiss in not acknowledging a 2015 report from a community group charged by the New Rochelle City Council to review community policing. Both the 2015 and 2020 committees were convened by the City Council and the 2020 report also falls under Governor Cuomo's Executive Order No. 203. The 2015 and 2020 committee reports explicitly focus on the need to improve trust, transparency and accountability between the community and NRPD. The 2020 report also provides recommendations related to use of force, training, data, transparency, oversight and civilian complaints and equipment. This report is divided by each topic and addresses the committee's goal, background, summary of recommendations and anticipated cost.

It bears repeating that it was the shocking killing of George Floyd and subsequent protest that motivated the Governor's Executive Order. Governor Cuomo stated, "The protests taking place throughout the nation and in communities across New York in response to the murder of George Floyd illustrate the loss of community confidence in our local police agencies — a reality that has been fueled by our country's history of police-involved deaths of black and brown people."

The committee also wants to acknowledge that the fatal shooting of Kamal Flowers in New Rochelle this summer has heightened the urgency and the need for a vigorous community review and engagement with the City and NRPD. In the words of the Equal Justice Initiative, "*We must truthfully confront our history of racial injustice before we can repair its painful legacy.*"

While the Governor's Order requires the committee's plan to be offered for public comments and presented to the local legislative body for adoption by April 1, 2021 the committee is submitting this report on October 30, 2020, at the request of the City Manager, in an effort to align recommendations requiring funding with New Rochelle's 2021 budget process. Given the Governor's order's deadline the committee considers this a preliminary report and specifically reserves the right to submit a supplemental report and recommendations based on future developments with Westchester County<sup>1</sup> and New Rochelle.

As part of preparing the 2020 report, there were a series of documents that formed a starting point for the committee's review. Those foundational documents should be read in tandem with this report. These documents consist of the following:

1. New Rochelle Police Department – Special Report to the City Council presented in July 2020<sup>2</sup>
2. Governor Cuomo's Executive Order Number 203<sup>3</sup>

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<sup>1</sup> The County Executive has authorized the formation of a Police Reform Task Force which may issue recommendations that impact this committee's final recommendations.

<sup>2</sup>[https://docs.google.com/gview?url=https%3A%2F%2Fnewrochelle.granicus.com%2FDocumentViewer.php%3Ffile%3Dnewrochelle\\_8b487e1c68b8bf72701ca1ff602eace5.pdf%26view%3D1&embedded=true](https://docs.google.com/gview?url=https%3A%2F%2Fnewrochelle.granicus.com%2FDocumentViewer.php%3Ffile%3Dnewrochelle_8b487e1c68b8bf72701ca1ff602eace5.pdf%26view%3D1&embedded=true) (page 134 and a copy of the 2015 NRCCP report is found on page 169)

<sup>3</sup>[https://docs.google.com/gview?url=https%3A%2F%2Fnewrochelle.granicus.com%2FDocumentViewer.php%3Ffile%3Dnewrochelle\\_8b487e1c68b8bf72701ca1ff602eace5.pdf%26view%3D1&embedded=true](https://docs.google.com/gview?url=https%3A%2F%2Fnewrochelle.granicus.com%2FDocumentViewer.php%3Ffile%3Dnewrochelle_8b487e1c68b8bf72701ca1ff602eace5.pdf%26view%3D1&embedded=true) (page 243-244)

3. Governor Cuomo's New York State Police Reform and Reinvention Collaborative: Resources and Guide for Public Officials and Citizens<sup>4</sup>

In closing, many hours were spent by volunteer committee members, City Staff and NRPD reviewing policies and engaging in challenging, but thoughtful conversations rooted in the desire to serve New Rochelle and enhance the trust between the community and NRPD. The committee looks forward to seeing the timely implementation of the recommendations that come from this report.

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<sup>4</sup> <https://www.governor.ny.gov/news/governor-cuomo-announces-new-guidance-police-reform-collaborative-reinvent-and-modernize>

## **BACKGROUND**

Charles B. Strome III, New Rochelle City Manager, convened the committee in response to a request by the New Rochelle City Council and in response to Governor Andrew Cuomo's Executive Order No. 203. The committee was charged to examine the following topics:

- Use of force policy and training;
- Data disclosure and transparency;
- Community engagement;
- Oversight/Discipline/Complaint procedures;
- Equipment and
- Other Issues.

After a citywide request for applications to serve on the committee, the committee was formed on August 13. Once formed, the committee met six times, hosted five community input meetings<sup>5</sup> beginning in August 2020 through October 2020. The primary goal of the committee was to review the aforementioned matters and submit recommendations to the City Council for consideration as part of the 2021 budget process. It is anticipated that the Committee will continue to hone its recommendations and submit a supplemental report within the next few months.

**Committee Members:** Lisa Burton, Alvin Clayton, Kwamain Dixon, Natasha Fapohunda, Robin Frankel, Nat Harris, Carmelo Hernandez, William Iannuzzi, Jason Labate, Wynter Parham, Wendell Sears, Emma Silva, Jabari Skeene and Steven Sonet.

**Staff Representatives:** Mayor Noam Bramson, City Manager Charles B. Strome III, NRPD Commissioner Joseph Schaller, NRPD Deputy Police Commissioner Robert Gazzola and Chief of Staff/Corporation Counsel Kathleen Gill were non-voting participants. Council Member Yadira Ramos-Herbert represented the City Council and acted as a non-voting facilitator of the committee.

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<sup>5</sup> Community input meetings were virtually held on 8/31/2020, 9/1/2020, 9/2/2020, 10/7/2020 and 10/28/2020.

## USE OF FORCE AND TRAINING

### Goal:

“It is important to engage both internal and external stakeholders in the development and implementation of your police department’s training materials and curricula. Incorporating members of the community in this process can strengthen the overall quality of your training program while reinforcing public trust and ensuring that your training and education programs reflect the values of your community (Cuomo, 2020, p.90).”<sup>6</sup>

### Background:

Many of our neighbors of color reported personal experiences that reduced and impacted trust with the NRPD. The July 2020 special report identifies many ways the NRPD has provided or participated in a number of community-based programs but there is not an example of a structured, formal collaboration between the NRPD and the community to proactively address use of force and training policies.

The committee suggested NRPD implement the Active Bystandership for Law Enforcement (ABLE) Project, a holistic program and training designed to support a culture of peer intervention and active bystandership to prevent misconduct, reduce officer mistakes, and promote officer wellness. In response to the recommendation the NRPD expressed some reservations. The reservations were based on the following: many of the concepts are already part of the NRPD training program, the additional allotted training time that would be mandated and the specific structure of the course that is required to be followed with some elements in contrast with what NRPD is mandated to teach.

### Summary of Recommendation:

1. The committee recommends NRPD participate in rigorous and robust training that focuses on advancing procedural justice practices, emotional intelligence, community-oriented policing, and specifically addresses the role of race in officer’s perceptions of risk and their decision making in potentially dangerous interactions with citizens.
2. The committee strongly recommends implementation of the Implicit Bias training that was delayed due to COVID-19 and refreshes ICAT.
3. The committee recommends NRPD consider the implementing universal crisis intervention training for all officers.
  - a. The committee recommends NRPD engage in robust training on when and how to engage Clergy Rapid Response Team.
  - b. The committee recommends NRPD explore other potential community crisis responders with a focus on de-escalating outcomes.
  - c. The committee recommends the City Council join any County level shared services model for crisis responders.
4. The committee recommends NRPD implement the (ABLE) Project:

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<sup>6</sup> Cuomo, A. (2020). *New York State Police Reform and Reinvention Collaborative: Resource Guide for Public Officials and Citizens*, p. 90.

[https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police\\_Reform\\_Workbook81720.pdf](https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police_Reform_Workbook81720.pdf)

- a. The ABLE Project is a unique and model program. The training itself is evidence based and tested, demands a commitment by the police agencies to cultural change, and is supported by a broad cross section of both police and community groups.
  - b. Yonkers has been accepted<sup>7</sup> into the ABLE program which suggests the NRPD has an opportunity to join the ABLE Project and become a leader in embracing progressive training and proven practices to advance cultural change within policing in Westchester County.
5. The committee recommends collaboration between NRPD and community members to “co-produce” and update policies and training programs in a manner that reflects clear roles and responsibilities to achieve community centered safety goals, violence reduction and address key problem areas. Special consideration should be paid to Use of Force and De-escalation policies to reflect norming best practices, including the ban of intentional neck and chokeholds.
  - a. As noted in the special report, since 1983, the NRPD has successfully received accreditation from the New York State Division of Criminal Justice Services. Receiving accreditation requires a review and audit of policies every three-five years for compliance. The NRPD responded “We agree with the Committee that policies should be regularly reviewed and updated.”
  - b. The committee recommends leveraging this process to include community stakeholders any time policies are revised as this will help facilitate the “co-production” and by extension trust between the community and the NRPD.
6. The committee recommends the creation of a *Serious Incident Review Board* comprising of sworn staff and community members to review cases involving officer involved shootings and other serious incidents that have the potential to damage community trust or confidence in the agency.
  - a. NRPD responded this has merit and will be further explored.

**Anticipated Cost:**

The committee and community will learn the 2021 allocation as part of the budget process and encourages the allocated funding to be focused on the training as detailed above.

1. In 2020, the City budgeted \$91,150 for training<sup>8</sup> and in 2018 \$33, 591 was the actual amount spent towards NRPD training and development. We will learn the 2019 actuals as part of the 2021 budget process.
2. ABLE Project training is free to accepted police departments and requires a dedicated program manager who will roll out, promote, and reinforce the program.

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<sup>7</sup> On October 1, 2020 Yonkers Police Department announced it was accepted to participate in the ABLE Project <https://www.yonkersny.gov/Home/Components/News/News/6985/3218?backlist=%2Ffive%2Fpublic-safety%2Fpolice-department>

<sup>8</sup> 2020 Adopted Budget and the Police Budget can be found on pages 149-172. <https://www.newrochelleny.com/DocumentCenter/View/11735/2020-Adopted-Budget>

- a. There are staffing costs in adding an additional eight-hour training to the existing in-service training program that would fall under overtime expenses and in preparing reports for the program, the committee recommends this investment.
3. Co-producing policies and trainings will not come at a significant financial cost.



## DATA DISCLOSURE AND TRANSPARENCY

### Goal:

“Transparency is one of the four pillars of procedural justice and is critical to ensuring accountability. Without a full picture of law enforcement policies, procedures, and activity, the public cannot meaningfully evaluate the performance of law enforcement. Even a well-functioning department risks losing public confidence when it does not engage in meaningful transparency. Departments should consider various ways to make law enforcement practices more transparent to the public. Data is an important tool for improving accountability because it provides the public with insight into police activity and can be leveraged to inform data-driven policies (Cuomo, 2020, p71).”<sup>9</sup>

“Data collection and utilization will allow the New Rochelle Police Department to identify and proactively address any disparate impact on racial, ethnic and/or gender groups. Data can also support “data-driven and intelligence-led policing efforts (Id., p.74).”<sup>10</sup>

### Current Status:

The NRPD produces an annual report every year, reporting the Department’s record of criminal activity and enforcement activity. The annual report is published in May of the year following the year referenced in the report. The report includes information about current staffing and the racial and gender composition of the staffing.

The report does not include the racial, ethnic or gender composition of people who are arrested, suspects, victims, complainants or other people involved in incidents. This type of information who NRPD stops or investigates currently exists in 4 different databases but the records management systems have never been engineered to provide/or aggregate this information.

The NRPD webpage is a part of the City’s overall webservice but is not utilized to its full potential. The webpage does not provide translation and this limits the ability for Spanish speaking residents to engage with information provided.

In order to file a complaint against an officer, a resident must print the form and either deliver it in person or mail in the completed form.

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<sup>9</sup> Cuomo, A. (2020). *New York State Police Reform and Reinvention Collaborative: Resource Guide for Public Officials and Citizens*, p. 71.

[https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police\\_Reform\\_Workbook81720.pdf](https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police_Reform_Workbook81720.pdf)

<sup>10</sup> Cuomo, A. (2020). *New York State Police Reform and Reinvention Collaborative: Resource Guide for Public Officials and Citizens*, p. 74.

[https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police\\_Reform\\_Workbook81720.pdf](https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police_Reform_Workbook81720.pdf)

### **Summary of Recommendations:**

1. The committee recommends that the NRPD update its website and allow public access to monthly reports that detail racial, ethnic, gender and location data related to all police stops, crime data, complaint data, vehicle and traffic law and daily activity logs.
  - a. The committee recommends the hiring of a data entry clerk who will aggregate the information in a manner that allows monthly digital access.
2. The committee recommends all information shared on the NRPD website be provided in English and Spanish.
  - a. The committee also recommends that the NRPD should proactively collaborate with the appropriate City Department (for example the communications department) to continuously monitor the languages spoken by residents of New Rochelle.
  - b. As new languages become prevalent in our community efforts should be made to translate these materials into the emerging languages in our community.
3. The committee recommends all complaints concerning a member of the NRPD should be:
  - a. capable of being filed through an on-line fill-in form;
  - b. tracked to a final disposition with a detailed explanation of the ultimate result and
  - c. available to the public with legal necessary redaction.
  - d. all identifying information of complainants should be held confidential and restricted to only those with the need to investigate, resolve or adjudicate such complaints and subject to a strictly enforced retaliation policy which confirms that any retaliation against any complainant will result in disciplinary action and possible termination by the offending officer. The retaliation policy should be clearly stated on the complaint form.
4. The committee recommends that the NRPD should proactively seek opportunities to participate in neighborhood and community meetings. These meetings should have staggered start times and days, accept written comments/questions (via an online portal), the recording of meetings and should be advertised.
5. The committee recommends a comprehensive data management overhaul be undertaken to analyze the following but not limited to collection, maintenance, analyzing, and disclosure practices.
  - a. Numerous examples of departments with transparent data practices can be found particularly by those departments under consent decrees. The creation of easily accessible public dashboards will bring benefit to both community and police.
6. For all stops by a police officer, the committee recommends that all officers are required to give their name, badge number, reasons for the stop and a card with instructions for filing a complaint.

**Anticipated Cost:** The implementation of these recommendations will require the hiring of one administrator (approximately \$70,000 annually), as well as the direct costs associated with website upgrade, software upgrade and technology that facilitates virtual meetings/conference calls.

## **COMMUNITY ENGAGEMENT**

### **Goal:**

The committee's goal is to ensure NRPD is leveraging technology and community policing models to ensure regular and real time engagement between the community and NRPD.

### **Background:**

In 2015, the City Council directed the City Manager to convene a committee focused on community policing ("NRCCP"). One of NRCCP's recommendations was to increase the number of officers in the department as a way to improve community policing.

The rise of social media changes the way members of the community receive information. Hiring someone who is skilled at bolstering information on social media will ultimately permit connecting with a wider audience in a more immediate manner. Engagement can include communicating change in policies, community programs, positive news and developments about the department and sharing information in times of crisis. Adaptation to new means of communication is key to community engagement.

New Rochelle is rich with many community and non-profit organizations who are all key stakeholders in the community but there is not a point person to help facilitate engagement with and across all of the organizations in a robust and organized manner.

The committee has observed certain streets that are in proximity to Peter Bracey Apartments and Heritage Homes (formerly known as Hartley Houses) have become "hot spots" in New Rochelle. These areas have become prone to shootings and quality of life disruptions. The New Rochelle Municipal Housing Authority manages Peter Bracey Apartments and used to manage Hartley Houses. While Heritage Homes is now managed by a private company, the residents of Peter Bracey and Heritage share many of the same concerns. The committee identifies community engagement and facilitated partnership with NRPD as a key ingredient in proactively addressing hot spots.

### **Summary of Recommendation:**

1. Communication modalities have changed and social media is the key way to share information. The committee recommends the hiring a staff member who is trained to permit a more robust social presence without violating NRPD Rules and Regulation sections 3.1, 3.2 and 3.4.
2. Increase personnel to permit improvement of community policing, specifically to address "hot spots" but to also increase engagement with members of the public and community stakeholders.
  - a. The committee recommends the hiring of a community stakeholder liaison. The liaison will be responsible for implementing strategic initiatives to foster better police/community relations. The individual will work closely with the Youth Bureau and other various City/State agencies to ensure better communication between City, State, Federal agencies and the community stakeholders.
  - b. The committee recommends the hiring of police officers and community members who will allow the creation of relationships that will reduce crime in hot spot areas, including 5 police officers assigned solely to Peter Bracey and Heritage Homes. These officers

should be trained in community service model practices that will help to build trust and engagement between the residents and the police.

- i. The reinstatement of Resident Security Officers (“RSO”) who are residents from the community to serve as liaisons with NRPD and helped to reduce crime.
  1. One committee member recalls a time where NRPD trained residents, provided a small stiped and walkie talkie and in turn these RSO’s served as liaisons with NRPD.
  2. City Staff reports the funding from this program was from the Housing Authority and not NRPD.
  3. While the NRPD was not responsible for operating the program, the model, one of intentional and proactive engagement and training with members of the community is a model the committee recommends the NRPD seek to implement.
- ii. The institution of a “Cure Violence” program where leaders in the community are trained to change norms, respond to shootings, organize the community and mediate violence and proactively address areas with high risk.<sup>11</sup>
- iii. The institution of a Credible Messengers<sup>12</sup> program, in which formerly incarcerated community members with street credibility receive mediation training (for disturbances/disputes/suspicious person/trespassing/juvenile disturbance calls not related to mental health issues) and are able to connect with and motivate the most at-risk young people to successfully challenge and transform destructive thinking, attitudes and actions

**Anticipated Cost:**

Different models will yield different costs.<sup>13</sup>

1. The committee recommends a combination of police and civilian hires and reserves the right to submit a supplemental report to provide updated cost assessments.
2. The committee also recommends approaching this request as a 5-year plan where every year additional resources are folded into the budget.

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<sup>11</sup> <https://cvg.org/>

<sup>12</sup> <https://cmjcenter.org/>

<sup>13</sup> One proposal includes hiring 5 additional police officers and the costs of a new police officer ranges from \$100,000 (in year 1) to \$150,000 in year 6. However, other models rely on incorporating community stakeholders in a way that empowers them with budgetary and physical resources to serve as a bridge/liaison to the NRPD.

## OVERSIGHT/DISCIPLINE/COMPLAINTS

### Goal:

The committee's goal is to remove barriers to reporting police misconduct and to ensure transparency should a police officer violate a policy.

### Background:

Ossining recently adopted legislation permitting the creation of a Civilian Review Board.<sup>14</sup> The legislative intent behind adopting the legislation was to ensure public confidence in the "effectiveness and integrity of investigations."<sup>15</sup>

"[Civilian review boards] may have the power to review investigative findings of Internal Affairs bureaus, to conduct their own investigations, to leverage various investigative tools, including subpoenas, and/or to impose discipline. Some entities also have the power to weigh in on key policy decisions (Cuomo, 2020, p.64)."<sup>16</sup>

### Summary of Recommendation:

The committee recommends the creation of an all-civilian structure with discipline power. There are different models that can exist and the committee submits the following as part of the consideration:

1. Model #1: The committee recommends this civilian committee assist in determining policy for the police department, share policy and policy changes in publicly accessible formats, hold public disciplinary hearings, discipline and dismiss police officers and participate in hiring decisions of the Police Commissioner. This group would also receive, investigate and resolve all civilian complaints against police in 120 days, access crime scenes, subpoena witnesses and files with penalties for non-compliance and interrogate officers less than 48 hours after an incident where deadly force is used and other powers.
2. Model #2: *Serious Incident Review Board* which is discussed on page 6 of this report.
3. Model #3: If as part of its police reform task force or county level legislation, Westchester County establishes a Civilian Review Board the committee recommends New Rochelle seek the participation in the County level review board.
4. Model #4: The creation of the Office of an Inspector General which is not a part of NRPD but is an office within City Hall charged with investigating and resolving complaints or allegations of misconduct.

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<sup>14</sup> <https://ecode360.com/6422319> (Village of Ossining, NY – Chapter 7 Civilian Police Complaint Review Board, July 25, 2000).

<sup>15</sup> *Id.*

<sup>16</sup> Cuomo, A. (2020). *New York State Police Reform and Reinvention Collaborative: Resource Guide for Public Officials and Citizens*, p. 64.

[https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police\\_Reform\\_Workbook81720.pdf](https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/Police_Reform_Workbook81720.pdf)

**Anticipated Cost:**

Different models will yield different costs and this matter would require amendments to the collective bargaining agreement.

## EQUIPMENT

### **Goal:**

The goal is to permit access and transparency of engagement with police officers and members of the community.

### **Background:**

"In-car and body-worn cameras (BWCs) are frequently recommended, and are mandated for some police forces, as monitoring mechanisms to ensure accountability (Cuomo, 2020, p. 79)."<sup>17</sup>

### **Summary of Recommendation:**

1. The committee recommends body cameras for all officers and supervisors operating in the field as well as in-car cameras for all marked and unmarked vehicles.
2. The committee recommends the footage for these cameras should be stored and retained in a way that is easily accessible to third parties such as the NYS Attorney General's Office and requests from the public.
3. The committee also recommends digitizing all police employment records and civilian complaints.
4. The committee recommends an affirmative declaration from NRPD that they will not purchase or look for grants to purchase military grade weapons including rubber bullets, chemical gases

### **Anticipated Cost:**

The anticipated cost is \$1,193,037 over a five-year period to purchase and install body and in-car cameras. The total five-year cost is approximately \$1,443,037 and the City Staff reports there is a pending State grant that will provide approximately \$250,000 towards the cost.

1. City Staff report the initial capital cost of the body cameras is \$381,271 in the first year.
  - a. Body cameras will cost approximately \$210,666 each year in the second through fifth year.
2. City Staff report the initial capital cost for in-car cameras for the entire NRPD fleet (marked and unmarked vehicles) will cost approximately \$129,846 in the first year.
  - a. The capital cost for in-car cameras is \$31,314 each year in the second through fifth year.
  - b. The total five-year cost for in-car cameras for the entire NRPD fleet (marked and unmarked) is \$255,102.
3. Additional costs to be determined based on personnel assessment to facilitate aforementioned recommendations.
4. Additional costs to be determined to facilitate digitizing of records and complaints.

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<sup>17</sup> Id., page 79.

## OTHER

### HIRING

#### Goal:

Increase numbers underrepresented groups, including female and BIPOC officers.

#### Background:

NRPD relies on the NYS Civil Service exams for its hiring pool. NRPD also requires 60 college credits (although some military service is considered as a substitute). NRPD has agreed the workforce demographic should more closely represent to the community. Although preference is given to New Rochelle residents and minority candidates, there remain barriers to a representative police force, not helped by the fact that especially in minority communities, policing is often not seen as an appealing career choice in the current climate.

#### Summary of Recommendations:

1. Examination of civil service policies
  - a. Does this require advocacy to state representatives?
  - b. Consider tools available to advance practices that focus beyond cognitive abilities to measure key personality traits, community-oriented skills and capabilities.
  - c. Explore opportunities for candidates to earn hiring “points” from a range of desirable attributes, specifically focused to mitigate disparate impact that minority or working class, or low-income candidates may have in the process.
  - d. Consider current educational requirements thoughtfully and whether they present a barrier or can be adjusted in other ways to get more qualified candidates in the door while still incentivizing the attainment of higher education and its corresponding benefits for officers.

#### Anticipated Cost:

The committee has just started the process in analyzing the potential costs and reserves the right to submit an additional report once its review is complete.

### FOR PROFIT COMPONENT

#### Goal:

The underlying purpose of the NRPD is to serve and protect the citizens of the City. This purpose should not be subverted by using the resources of the NRPD to generate income through aggressive ticketing practices.



**Background-**The Committee became aware during our meetings with the public that there exists a perception that certain areas of the City are targeted with aggressive ticketing practices while other areas are essentially ignored. This perception only adds to the distance between the NRPD and certain segments of the residents of the City.

**Summary of Recommendations:**

1. Examine City records to discern whether the concern is of merit or merely anecdotal.
2. Determine whether alternate side of the street parking is in fact required for street cleaning purposes.

**Anticipated Cost:**

Unknown, but it seems clear that less aggressive tactics will result in less revenue.