



# SEATTLE CITY COUNCIL

## Public Safety Committee

### Agenda

Tuesday, August 12, 2025

9:30 AM

Council Chamber, City Hall  
600 4th Avenue  
Seattle, WA 98104

Robert Kettle, Chair  
Rob Saka, Vice-Chair  
Joy Hollingsworth, Member  
Debora Juarez, Member  
Sara Nelson, Member

Chair Info: 206-684-8807; [Robert.Kettle@seattle.gov](mailto:Robert.Kettle@seattle.gov)

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**SEATTLE CITY COUNCIL**  
**Public Safety Committee**  
**Agenda**  
**August 12, 2025 - 9:30 AM**

**Meeting Location:**

Council Chamber, City Hall , 600 4th Avenue , Seattle, WA 98104

**Committee Website:**

<https://www.seattle.gov/council/committees/public-safety>

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This meeting also constitutes a meeting of the City Council, provided that the meeting shall be conducted as a committee meeting under the Council Rules and Procedures, and Council action shall be limited to committee business. Pursuant to Council Rule VI.C.10, members of the public providing public comment in Chambers will be broadcast via Seattle Channel.

Members of the public may register for remote or in-person Public Comment to address the Council. Speakers must be registered in order to be recognized by the Chair. Details on how to register for Public Comment are listed below:

Remote Public Comment - Register online to speak during the Public Comment period at the meeting at <https://www.seattle.gov/council/committees/public-comment>. Online registration to speak will begin one hour before the meeting start time, and registration will end at the conclusion of the Public Comment period during the meeting.

In-Person Public Comment - Register to speak on the public comment sign-up sheet located inside Council Chambers at least 15 minutes prior to the meeting start time. Registration will end at the conclusion of the Public Comment period during the meeting.

Please submit written comments no later than four business hours prior to the start of the meeting to ensure that they are distributed to Councilmembers prior to the meeting. Comments may be submitted at [Council@seattle.gov](mailto:Council@seattle.gov) or at Seattle City Hall, Attn: Council Public Comment, 600 4th Ave., Floor 2, Seattle, WA 98104. Business hours are considered 8 a.m. - 5 p.m. Comments received after that time will be distributed after the meeting to Councilmembers and included as part of the public record.

*Please Note: Times listed are estimated*

**A. Call To Order**

**B. Approval of the Agenda**

**C. Public Comment**

**D. Items of Business**

1.     [CB 121052](#)     **AN ORDINANCE** relating to surveillance technology implementation; authorizing approval of uses and accepting the 2025 updated surveillance impact report and 2025 executive overview for the Seattle Police Department's use of Closed-Circuit Television Camera Systems.

Attachments:   [Att 1 - 2025 SIR Closed-Circuit Television Camera Systems](#)  
                      [Att 2 - 2025 SIR Closed-Circuit Television Camera Systems](#)  
                      [Executive Overview](#)

Supporting  
Documents:   [Summary and Fiscal Note](#)  
                      [Central Staff Memo](#)  
                      [Amendment 1](#)  
                      [Amendment 2](#)  
                      [Amendment 3](#)

**Briefing, Discussion, and Possible Vote** (30 minutes)

**Presenters:** Greg Doss, Council Central Staff; Brian Maxey, Chief Operating Officer, Seattle Police Department

2.     [CB 121053](#)     **AN ORDINANCE** relating to surveillance technology implementation; authorizing approval of uses and accepting the 2025 updated surveillance impact report and 2025 executive overview for the Seattle Police Department's use of Real-Time Crime Center software.

Attachments:   [Att 1 - 2025 SIR Real-Time Crime Center](#)  
                      [Att 2 - 2025 SIR Real-Time Crime Center Executive Overview](#)

Supporting  
Documents:   [Summary and Fiscal Note](#)  
                      [Central Staff Memo](#)  
                      [Amendment 1](#)

**Briefing, Discussion, and Possible Vote** (30 minutes)

**Presenters:** Greg Doss, Council Central Staff; Brian Maxey, Chief Operating Officer, Seattle Police Department

## E. Adjournment



## Legislation Text

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**File #:** CB 121052, **Version:** 1

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### CITY OF SEATTLE

#### ORDINANCE \_\_\_\_\_

#### COUNCIL BILL \_\_\_\_\_

AN ORDINANCE relating to surveillance technology implementation; authorizing approval of uses and accepting the 2025 updated surveillance impact report and 2025 executive overview for the Seattle Police Department's use of Closed-Circuit Television Camera Systems.

WHEREAS, on October 8, 2024, the City Council passed Ordinance 127110, adopting the original Surveillance Impact Report (SIR) for Closed-Circuit Television Camera Systems (CCTV); and

WHEREAS, the purpose of the CCTV camera program is to prevent crime, collect evidence related to serious and/or violent criminal activity, hold offenders accountable, and in conjunction with the Real-Time Crime Center, provide visual information to analysts in real-time that can assist officers in responding to calls; and

WHEREAS, subsection 14.18.020.F of the Seattle Municipal Code (SMC), which section was enacted by Ordinance 125376 and last amended by Ordinance 125679, states that "[a]ny material update to an SIR, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance"; and

WHEREAS, the CCTV pilot deployment areas authorized in the 2024 SIR were Aurora Avenue North, Belltown, and the Downtown Commercial Core; and

WHEREAS, the City Council increased the budget by \$200,000 General Fund (2025), with an endorsement for \$16,000 General Fund (2026), to expand the Closed-Circuit Television pilot on Aurora to extend the pilot site further south to 85th Street and further north to 145th Street; and

WHEREAS, the majority of the cameras have been deployed in the Chinatown-International District, Aurora

Avenue North, and Downtown Core; and

WHEREAS, the material update adds the Stadium District, Garfield High School, and the Capitol Hill Nightlife

District to the list of eligible CCTV deployment areas and clarifies the retention policy to 30 days after

date of recording, or until determined that no security incident has occurred before being deleted; and

WHEREAS, the new website [seattle.gov/cctv](http://seattle.gov/cctv) is available to see the locations of the CCTVs and provides

answers to the public regarding frequently asked questions about the CCTV program; NOW,

THEREFORE,

**BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:**

Section 1. Pursuant to Ordinances 125376 and 125679, the City Council approves use of the Seattle Police Department's use of Closed-Circuit Television Camera Systems and accepts the updated 2025 Surveillance Impact Report (SIR) for this technology, attached to this ordinance as Attachment 1, and the Executive Overview for the same technology, attached to this ordinance as Attachment 2.

Section 2. This ordinance shall take effect as provided by Seattle Municipal Code Sections 1.04.020 and 1.04.070.

Passed by the City Council the \_\_\_\_\_ day of \_\_\_\_\_, 2025, and signed by  
me in open session in authentication of its passage this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_

President \_\_\_\_\_ of the City Council

Approved /    returned unsigned /    vetoed this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
  
Bruce A. Harrell, Mayor

Filed by me this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
  
Scheereen Dedman, City Clerk

(Seal)

**Attachments:**

Attachment 1 - 2025 Surveillance Impact Report: Closed-Circuit Television Camera Systems

Attachment 2 - 2025 Surveillance Impact Report Executive Overview: Closed-Circuit Television Camera Systems

## 2025 Surveillance Impact Report

# Closed-Circuit Television Camera Systems

## Seattle Police Department

### Surveillance Impact Report Versions:

- 2024 Surveillance Impact Report: Seattle Police Department Closed-Circuit Television Camera Systems adopted by [Ordinance 127110](#) on 10/08/2024.
- 2025 Surveillance Impact Report: Seattle Police Department Closed-Circuit Television Camera Systems

# Surveillance Impact Report (“SIR”) overview

## About the Surveillance Ordinance

The Seattle City Council passed Ordinance [125376](#), also referred to as the “Surveillance Ordinance,” on September 1, 2017. SMC 14.18.020.b.1 charges the City’s executive with developing a process to identify surveillance technologies subject to the ordinance. Seattle IT, on behalf of the executive, developed and implemented a process through which a privacy and surveillance review is completed prior to the acquisition of new technologies. This requirement, and the criteria used in the review process, are documented in [Seattle IT Policy PR-02](#), the “Surveillance Policy”.

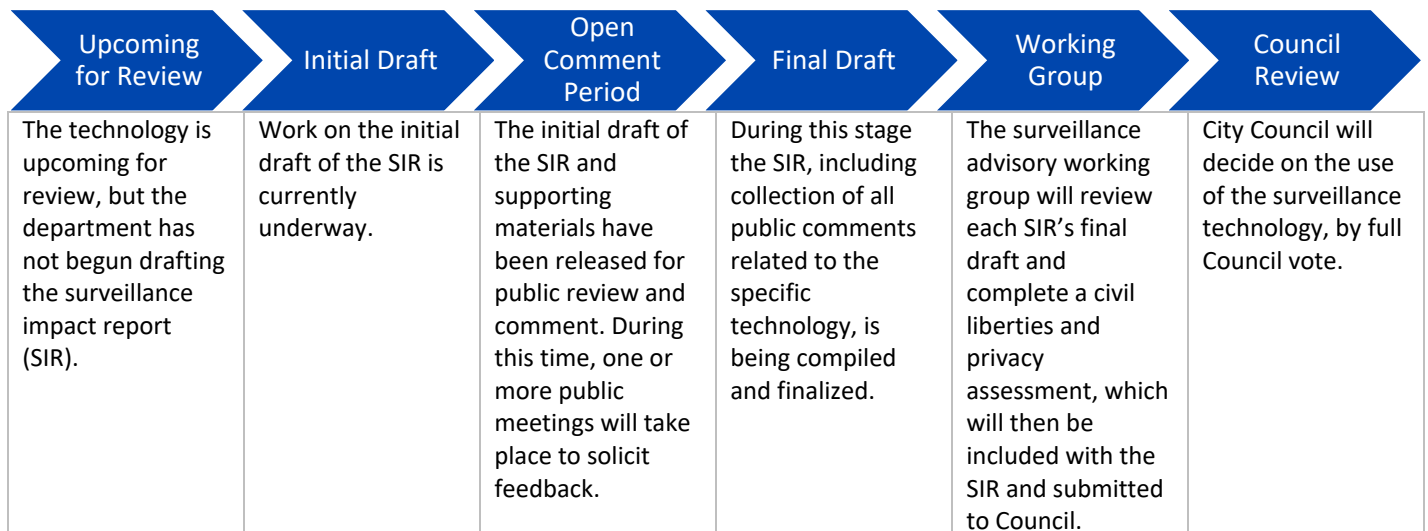
## How this Document is Completed

This document is completed by the requesting department staff, support and coordinated by the Seattle Information Technology Department (“Seattle IT”). As Seattle IT and department staff complete the document, they should keep the following in mind.

1. Responses to questions should be in the text or check boxes only; all other information (questions, descriptions, etc.) Should **not** be edited by the department staff completing this document.
2. All content in this report will be available externally to the public. With this in mind, avoid using acronyms, slang, or other terms which may not be well-known to external audiences. Additionally, responses should be written using principally non-technical language to ensure they are accessible to audiences unfamiliar with the topic.

## Surveillance Ordinance Review Process

The following is a high-level outline of the complete SIR review process.



# Privacy Impact Assessment

## Purpose

A Privacy Impact Assessment (“PIA”) is a method for collecting and documenting detailed information collected in order to conduct an in-depth privacy review of a program or project. A PIA asks questions about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. It also requests information about policies, training and documentation that govern use of the technology. The PIA responses are used to determine privacy risks associated with a project and mitigations that may reduce some or all of those risks. In the interests of transparency about data collection and management, the City of Seattle has committed to publishing all PIAs on an outward facing website for public access.

## When is a Privacy Impact Assessment Required?

A PIA may be required in two circumstances.

1. When a project, technology, or other review has been flagged as having a high privacy risk.
2. When a technology is required to complete the surveillance impact report process. This is one deliverable that comprises the report.

## 1.0 Abstract

### 1.1 Please provide a brief description (one paragraph) of the purpose and proposed use of the project/technology.

Gun violence, human trafficking, and other persistent felony crimes are concentrated at specific geographic places in the city. This concentrated crime is often anchored at these places and requires a holistic crime-prevention strategy.

The Crime Prevention Technology program is one component of an overall strategy of addressing felony crime at specific places. These technologies will be coupled with police patrols, continued investments in community-based initiatives, and enhanced lighting and cleaning.

The CCTV program is designed to be a pilot project, with independent researchers conducting an outcome evaluation to be completed two years after implementation. Depending on the outcome of the evaluation, the pilot project may be either discontinued or continued.

This SIR covers closed-circuit television (CCTV) camera systems proposed by the Seattle Police Department (SPD) to deter and detect criminal activity. The CCTV camera systems are proposed to be installed at locations where gun violence, human trafficking, and persistent felony crime is concentrated. The cameras will face toward the street, sidewalk, and other public areas. Signs acknowledging the use of the cameras will be posted in the immediate area of deployment, and street fliers will be distributed. In addition to the city-owned and operated CCTV cameras, privately-owned security systems will be able to voluntarily share video of storefronts and areas where the public has access with SPD. This voluntary sharing

of CCTV images of publicly accessible areas will increase the effectiveness of the technology-assisted crime prevention effort. CCTV camera systems contribute to averting harm to individuals and property and reducing crime by assisting in collecting evidence related to serious and/or violent criminal activity as part of investigations. For example, CCTVs could be used to review firearms-related homicides or aggravated assaults to identify the offender(s) and hold them accountable and provide justice for the victims and remove deadly weapons from the street.

## **1.2 Explain the reason the project/technology is being created or updated and why the PIA is required.**

The City's police staffing crisis, now in its fourth year, has resulted in over 700 officers departing SPD since 2019. As of January 2024, 913 police officers are available for deployment in the city, the lowest number of in-service officers since 1991 and significantly below per-capita staffing relative to comparative jurisdictions. Low staffing levels also affect investigations, which hinders police effectiveness in solving cases and holding violent criminals accountable.

Gun violence, human trafficking, and other persistent felony crimes are concentrated at specific geographic places and long-time efforts to prevent these crimes have not been consistently successful. Implementing technology tools to bolster policing capabilities, as one part of a holistic crime prevention and reduction plan is essential to address ongoing gun violence, vehicle theft, human trafficking, and persistent felony crime at specific places, including within our most victimized communities.

The Crime Prevention Technology program is one component to this overall strategy of addressing this issue. These technologies will be coupled with police patrols, continued investments in community-based initiatives, and enhanced lighting and cleaning.

SPD's proposed CCTV camera systems would capture video of identifiable individuals, some of whom may be unaware of the recording, despite signage. Without appropriate safeguards, this raises significant privacy concerns which has resulted in this review. Recognizing these concerns, SPD proposes the CCTV camera systems will be utilized in a limited fashion and only in public-facing locations. The cameras will face toward the street, sidewalk, and other public areas and signs acknowledging use of the cameras will be posted.

## **2.0 Project / Technology Overview**

Provide an overview of the project or technology. The overview gives the context and background necessary to understand the purpose, mission and justification for the project / technology proposed.

### **2.1 Describe the benefits of the project/technology.**

The theory of change supporting the program is that these technologies (1) bolster police effectiveness in public places where crime is concentrated when used with other crime

prevention efforts, including increased police patrols, enhanced lighting, graffiti mitigation, and others (CPTED), (2) deter criminal behavior when the public is aware of the cameras, and (3) gather evidence to hold offenders accountable. These efforts can improve public safety and enhance the public's confidence in the city government's ability to maintain safe neighborhoods.

Serious felony crimes are often concentrated at specific geographic locations in Seattle and long-time efforts to prevent these crimes have not been consistently successful. Police effectiveness is further hindered due to unprecedented patrol and investigation staffing shortages in the Seattle Police Department.

The purpose of the CCTV program is to mitigate unprecedented patrol and investigations staffing shortages by leveraging evidence-based and industry-standard technologies to deter and detect persistent felony criminal behavior, gun violence, and human trafficking at specific places where these crimes are concentrated.

CCTV camera systems contribute to averting harm to individuals and property and reducing crime by assisting in collecting evidence related to serious and/or violent criminal activity as part of investigations thereby supporting closing investigative cases, holding criminals accountable, and removing deadly weapons off the street. For example, CCTVs could be used to review a firearms-related homicide to identify the suspect and provide information that would provide justice for the victims and remove deadly weapons from the street.

## **2.2 Provide any data or research demonstrating anticipated benefits.**

Research has shown that CCTV cameras can be effective when deployed to address specific crime problems in specific geographic places and coupled with crime prevention through environmental design (CPTED) measures, other crime prevention technologies, patrol, and public support. The federal Department of Justice, the National Institute of Justice, and George Mason University's Center for Evidence Based Crime Policy rate the technology as "promising," meaning there is evidence of its effectiveness in preventing crime and aiding criminal investigations. Research is strong that CCTV increases the effectiveness of investigations.

In one broad study, researchers found that: "Results of this systematic review—based on 40 years of evaluation research—lend support for the continued use of CCTV to prevent crime as well as provide a greater understanding of some of the key mechanisms of effective use"<sup>1</sup>. The study also showed that there is evidence that "CCTV schemes incorporating active monitoring (n = 54) were associated with a significant reduction in crime"<sup>2</sup>, highlighting the

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<sup>1</sup> Piza, E., Welsh, B., Farrington, D. and Thomas, A. (2019). CCTV Surveillance for Crime Prevention: A 40-Year Systematic Review with Meta-Analysis. *Criminology & Public Policy*, 18(1): 135-159

<sup>2</sup> Ibid

role of active monitoring (e.g., Real-Time Crime Center) in enhancing the efficacy of CCTV systems.

Similar CCTV technology is widely used both internationally and domestically. Major cities in the United States with a comparable or greater number of residents to Seattle using CCTV include Atlanta, Baltimore, Chicago, Los Angeles, New York, Philadelphia, Phoenix, Portland, San Diego, San Francisco, and others. At least 43 municipalities in Washington State use some or all the technologies being proposed by SPD.

Here are some additional studies that look into these technologies:

- 2023 study of CCTV: ["Evaluating the Effect of CCTV on Crime Occurrence and Case Clearances" by Amanda L. Thomas \(cuny.edu\)](#)
- 2021 study of CCTV in Dallas. [SocArXiv Papers | The effect of public surveillance cameras on crime clearance rates \(osf.io\)](#)
- 2019 study of CCTV from New York. [CCTV surveillance for crime prevention - Piza - 2019 - Criminology & Public Policy - Wiley Online Library.](#)
- 2012 study of the St. Louis program. <https://academic.oup.com/policing/article-abstract/6/1/26/1457126>

SPD will evaluate the efficacy of the CCTV implementation through standard performance measures already in use: violent crime rate, priority one response time, patrol coverage when not responding to calls (over/under policing), equity, perceptions of trust, perceptions of safety. Successful implementation of this suite of technologies (CCTV/RTCC/enhanced ALPR) will be indicated by a decrease in violent crime, priority one response time, no increase or a decline in measures of police over-presence, measure of disparate impact, and an increase in perceptions of trust and safety.

The pilot portion of the program will be data-informed and guided. It will terminate if data suggests the technology is ineffective. Utilizing the abilities of the Performance Analytics and Research Unit, the Seattle Police Department has a plan to actively manage performance measures reflecting the “total cost of ownership of public safety,” Equity, Accountability, and Quality (“EAQ”), which includes measures of disparate impact and over-policing. In addition to a robust Continuous Intervention Assessment designed to inform, in real-time, the active development of a safer, more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures just right policing is achieved with undue collateral harm.

## **2.3 Describe the technology involved.**

Each CCTV system consists of the following, with some variance depending on the specific technology/vendor solution that is selected:

- Cameras: these can range from simple fixed cameras to more sophisticated cameras with pan-tilt-zoom (PTZ) as well as other capabilities (infrared night vision, high-definition imaging, etc.).
- Recording Devices: DVRs (digital video recorders) or NVRs (network video recorders) are used for storing video footage. DVRs are used for analog cameras, whereas NVRs are designed for IP (internet protocol cameras).
- Storage: the video footage is stored locally within hard drives within DVRs/NVRs for up to 30 days after date of recording, or until determined that all evidence material to an incident under investigation has been transferred to secure storage before being deleted. If video is identified as evidence in an investigation, it will be stored in SPD's secure electronic evidence storage.
- Video Management System: the software system that enables authorized users to view the live feed of the CCTV system and review recordings.
- Edge-Based Analytics capabilities: many modern CCTV systems have built-in processing power that enables them to perform a range of analytics such as motion detection and object recognition (e.g., identifying vehicles or people by the clothing they are wearing or items they may be carrying). "Edge-Based" refers to this processing being done on the camera, reducing the need for high network bandwidth. SPD will not use AI facial recognition tools.
- Technology exists for private owners of video security systems to voluntarily share streams of specific cameras with SPD.
- Data Encryption and Security: to ensure privacy and security, cloud-based systems encrypt data both in transit (when being uploaded) and at rest (when stored).
- Connectivity can either be through a wired fiber connection or via cellular modem.
- Cameras and supporting hardware (router, modem, DVR, etc.) that is self-contained in an enclosure that allows easy movement from one location to another if need be.
- Software that manages camera and supporting hardware, allowing monitoring of device status, power consumption, etc.

## **2.4 Describe how the project or use of technology relates to the department's mission.**

The mission of the Seattle Police Department is to prevent crime, enforce the law, and support quality public safety by delivering respectful, equitable, professional, and dependable police services. SPD's priorities include the use of best practices that include officer safety guidelines and performance-based accountability to provide progressive and responsive police services to crime victims, witnesses, and all members of the community, and to structure the organization to support the SPD mission and field a well-trained sworn and non-sworn workforce that uses technology, training, equipment, and research strategically and effectively.

CCTV camera systems contribute to averting harm to individuals and places and reduce crime by collecting evidence related to serious and/or violent criminal activity as part of investigations.

## **2.5 Who will be involved with the deployment and use of the project / technology?**

Seattle IT and SPD will collaborate to plan, procure, and deploy the technology. Operational management will be handled by SPD's Real Time Crime Center (RTCC), and SPD will also provide ongoing management and administration of the system (including user account creation, inventory management, audit log access, etc.). Technical support for the CCTV camera systems will be handled by Seattle IT and vendor support contracts. Seattle's Office of Inspector General (OIG) will be given access to the system at any time for auditing purposes. Other City departments or private contractors may be involved in installing the device dependent on permitting needs.

## **3.0 Use Governance**

Provide an outline of any rules that will govern the use of the project/ technology. Please note: non-City entities contracting with the City are bound by restrictions specified in the surveillance ordinance and privacy principles and must provide written procedures for how the entity will comply with any restrictions identified.

### **3.1 Describe the processes that are required prior to each use, or access to/ of the project / technology, such as a notification, or check-in, check-out of equipment.**

The system will have a set of access controls based on what is required for each user. Only authorized/trained SPD and OIG personnel will have direct access to the CCTV system.

Video may only be accessed or extracted for legitimate law enforcement purposes, as governed by SPD Policy 12.050.

SPD is developing an omnibus surveillance technology policy to provide general guidance on several topics, including value and equity statements for technology use, an explanation of the surveillance ordinance requirements, internal processes for technology approval and acquisition, general tracking metrics for surveillance technologies, retention requirements and limitations, and general use requirements for surveillance technologies. Additionally, issues and guidance unique to specific surveillance technologies would be included for each technology. As such, the department will create a policy section for each surveillance technology, including those proposed here. The need for ALPR, CCTV, and RTCC technologies and the strategic deployment of the SPD policies is driven by gun violence and persistent felony crime at specific locations. SPD's use of these technologies will focus on these crimes.

### **3.2 List the legal standards or conditions, if any, that must be met before the project / technology is used.**

The CCTV cameras will be placed to capture events in plain view in public areas. The cameras will face toward the street, sidewalk, and other public areas and signs will be posted identifying their presence and use. Street fliers will also be distributed prior to camera activation in the affected areas.

Since minors (children) are present in public spaces, SPD may record video with children present, however, because disclosure of images of any minor is presumed highly offensive, images of an identifiable minor are almost always exempt from public disclosure.

SPD is developing an omnibus surveillance technology policy to provide general guidance on several topics, including value and equity statements for technology use, an explanation of the surveillance ordinance requirements, internal processes for technology approval and acquisition, general tracking metrics for surveillance technologies, retention requirements and limitations, and general use requirements for surveillance technologies.

Additionally, issues and guidance unique to specific surveillance technologies would be included for each technology. As such, the department will create a policy section for each surveillance technology, including those proposed here. The need for ALPR, CCTV, and RTCC technologies and the strategic deployment of the SPD policies is driven by gun violence and persistent felony crime at specific locations. SPD's use of these technologies will focus on these crimes.

### **3.3 Describe the policies and training required of all personnel operating the project / technology, and who has access to ensure compliance with use and management policies.**

Supervisors and commanding officers are responsible for ensuring compliance with policies. CCTV camera systems will only be made accessible to authorized SPD, OPA, and OIG personnel. Authorized personnel will receive training in the CCTV video management system prior to authorization.

All SPD employees must adhere to laws, City policy, and Department Policy ([SPD Policy 5.001](#)), and any employees suspected of being in violation of laws or policy or other misconduct are subject to discipline, as outlined in [SPD Policy 5.002](#).

## **4.0 Data Collection and Use**

### **4.1 Provide details about what information is being collected from sources other than an individual, including other IT systems, systems of record, commercial data aggregators, publicly available data and/or other City departments.**

Until data is extracted from the CCTV system's local storage, the data is temporarily stored on the device. Video may only be extracted for legitimate law enforcement purposes (such as a dispatched call for service or investigations of crimes), as governed by [SPD Policy 12.050](#).

Video recordings will be kept on the cameras for up to 30 days after date of recording, or until determined that all evidence material to an incident under investigation has been transferred to secure storage and not retained for a longer duration unless manually extracted by authorized personnel via the video management system software. Private, 3<sup>rd</sup> party video, if used on SPD storage, will be subject to up to 30 days of retention after date of recording, or until determined that all evidence material to an incident under investigation has been transferred to secure storage.

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense (GO) Report. Evidence is submitted to the Evidence Unit and associated with a specific GO Number and investigation.

#### **4.2 What measures are in place to minimize inadvertent or improper collection of data?**

In order to minimize inadvertent collection of data, the CCTV cameras will only be placed to capture events in plain view in public areas.

CCTV video recordings are automatically purged by the system up to 30 after date of recording, or until determined that all evidence material to an incident under investigation has been transferred to secure storage.

Additionally, the CCTV camera systems will maintain a complete audit log of activities (including but not limited to personnel access and video extraction logs) and would be subject to an audit by the Office of Inspector General at any time.

#### **4.3 How and when will the project / technology be deployed or used? By whom? Who will determine when the project / technology is deployed and used?**

The desired deployment date for pilot areas is Spring of 2025.

For the initial pilot project, CCTV cameras will be temporarily placed at specific geographic locations to deter and detect criminal activity. Locations will be prioritized based on the concentration of gun violence, human trafficking, and persistent felony crimes. The three initial pilot areas will be Aurora Avenue North in the North Precinct, downtown in areas along and adjacent to the Third Avenue corridor, and the Chinatown International District.

In addition to the initial program areas, there are three additional sites identified for CCTV cameras because of the concentration of gun violence, human trafficking, and other persistent felony crimes as well as other major upcoming city events that will bring in hundreds of thousands of visitors to the location. Those locations are:

1. Areas around Lumen and T-Mobile Field, including parts of the southern portions of Pioneer Square.
2. Areas surrounding Garfield High School between S Jackson St. to the South, E Cherry St. to the North, 20<sup>th</sup> Ave. S to the West, and MLK Jr. Way to the East.

3. The Capitol Hill Nightlife District – E Union St. to the South, E Pine St. to the North, Broadway to the West, and 12<sup>th</sup> Ave. to the East. In addition, Neagle Pl. between E Pine and E Denny Way.

#### **4.4 How often will the technology be in operation?**

The technology will be in continuous operation. The possible initial pilot areas under consideration are Aurora Avenue North, Chinatown-International District, and the Downtown Commercial Core including parts of Belltown. The exact duration of the pilot will be evaluated under a *Continuous Impact Assessment*<sup>3</sup> framework; however, time to prove an effect may vary depending on a number of factors. Outside academic subject matter experts will be retained to design and manage an evaluation plan with an assessment at the end of one year and another at the end of year two.

#### **4.5 What is the permanence of the installation? Is it installed permanently, or temporarily?**

At a minimum, the installation of the CCTV systems will last for the duration of the initial pilot program. It may extend beyond that period if effective. The CCTV cameras may be moved if there is an emerging need in another area.

#### **4.6 Is a physical object collecting data or images visible to the public? What are the markings to indicate that it is in use? What signage is used to determine department ownership and contact information?**

The cameras themselves will be visible to the public, and signs will be placed to alert the public to their presence and use.

#### **4.7 How will data that is collected be accessed and by whom?**

Only authorized SPD, OPA and OIG users can access the CCTV camera feed or the data it captures. Access to the systems/technology is limited to authorized personnel via password-protected login credentials.

Data extracted from the system/technology and entered into investigative files is securely inputted and used on SPD's password-protected network with access limited to authorized detectives and identified supervisory personnel.

Access to video evidence is controlled by SPD Manual Title 12 provisions governing Department Information Systems including [SPD Policy 12.040](#) - Department-Owned Computers, Devices & Software, [SPD Policy 12.050](#) - Criminal Justice Information Systems, [SPD Policy 12.080](#) – Department Records Access, Inspection & Dissemination, [SPD Policy](#)

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<sup>3</sup> [“Test-As-You-Go” for Hot Spots Policing: Continuous Impact Assessment with Repeat Crossover Designs | Cambridge Journal of Evidence-Based Policing \(springer.com\)](#)

[12.110](#) – Use of Department E-mail & Internet Systems, and [SPD Policy 12.111](#) – Use of Cloud Storage Services.

Personal or inappropriate use or dissemination of information being used for law enforcement purposes can result in internal discipline, termination, and penalties under federal or state law.

Data collected on 3<sup>rd</sup> party systems will be accessed by SPD personnel using the above guidelines, but will be owned by the 3<sup>rd</sup> party, unless taken into evidence. 3<sup>rd</sup> party streams that are recorded by SPD will be subject to Washington State public disclosure laws.

**4.8 If operated or used by another entity on behalf of the City, provide details about access, and applicable protocols.**

SPD's CCTV camera systems will not be used or operated by other law enforcement agencies. Video extracted/obtained as evidence may be shared with an outside agency, as described in SIR section 6.1. Vendors and external partners will not be able to view private criminal incident information unless it is being used for troubleshooting technical issues. Video shared with vendors for technical purposes will only be shared with permission from SPD.

**4.9 What are acceptable reasons for access to the equipment and/or data collected?**

Data will be accessed and used by police to provide precise data and information in real time to responding patrol and specialty units allowing them to make better decisions, reduce unnecessary work, and increase effectiveness, leading to better, more desired outcomes. Cameras may also be accessed to assist in active investigations. Data may only be viewed or extracted for legitimate law enforcement purposes (such as a dispatched call for service or investigations of crimes), as governed by [SPD Policy 12.050](#). Recorded video will only be retained for up to 30 days after date of recording, or until determined that all evidence material to an incident under investigation has been transferred to SPD's secure digital evidence lockers. Other City of Seattle departments may access cameras as defined by their internal policies.

**4.10 What safeguards are in place, for protecting data from unauthorized access (encryption, access control mechanisms, etc.) And to provide an audit trail (viewer logging, modification logging, etc.)?**

Storage of CCTV video will take place within secure City of Seattle facilities under the administration of the Information Technology Department. If cloud storage is utilized, it will follow city security guidelines and will only be accessible to outside parties as part of system maintenance and support only when authorized.

Various measures will be in place to protect data from unauthorized access.

- Data Encryption
- Access control mechanisms (meeting CJIS requirements\*)

- Strict user permission settings
- Industry standard network security measures (meeting CJIS requirements)

The system will maintain audit logs of user and system actions. These logs will be maintained within the system and be accessible to those with permission to view. Logs will be accessible to the Office of Inspector General upon request.

\* Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI) sets requirements for organizations that access or use criminal justice information. These requirements are referred to as “[CJIS requirements](#)” and are developed and audited for compliance by the FBI.

## **5.0 Data Storage, Retention and Deletion**

### **5.1 How will data be securely stored?**

The data will be encrypted at rest (where it is stored) and in transit (either through vendor encryption or through VPN on the City network side) as it’s being transmitted from the camera device to the storage system, server, or cloud. The storage configuration may vary from vendor to vendor, but SPD expects similar industry standards when it comes to cloud storage and access controls.

### **5.2 How will the owner allow for departmental and other entities, to audit for compliance with legal deletion requirements?**

Per the Washington Secretary of State’s Law Enforcement Records Retention Schedule, the required records retention period for surveillance video that does not involve a specific incident is “Retain for 30 days after last recording or until determined that no security incident has occurred, whichever is sooner, then Destroy.” Data associated with criminal investigations will be saved as evidence in SPD’s digital evidence locker consistent with retention guidelines for evidence.

Audits from the Office of Inspector General or other official auditors, will be allowed as needed.

### **5.3 What measures will be used to destroy improperly collected data?**

As noted in section 5.2 above, CCTV data stored by the city will be automatically purged by the system for up to 30 days after date of recording, or until determined that all evidence material to an incident under investigation has been transferred to SPD’s secure digital evidence lockers. Data collected from a private security system and stored on SPD storage will only be stored by the City for up to 30 days after date of recording, or until determined that all evidence material to an incident under investigation has been transferred to SPD’s secure digital evidence lockers.

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense Report. Evidence is submitted to the Evidence Unit and associated with a specific GO Number and investigation.

All information must be gathered and recorded in a manner that is consistent with [SPD Policy 6.060](#), such that it does not reasonably infringe upon “individual rights, liberties, and freedoms secured by the Constitution of the United States and of the State of Washington, including, among others, the freedom of speech, press, association and assembly; liberty of conscience; the exercise of religion; and the right to petition government for redress of grievances; or violate an individual’s right to privacy.”

All SPD employees must adhere to laws, City policy, and Department Policy ([SPD Policy 5.001](#)), and any employees suspected of being in violation of laws or policy or other misconduct are subject to discipline, as outlined in [SPD Policy 5.002](#).

#### **5.4 which specific departmental unit or individual is responsible for ensuring compliance with data retention requirements?**

Unit supervisors are responsible for ensuring compliance with data retention requirements within SPD.

Additionally, any appropriate auditor, including the Office of Inspector General can audit for compliance at any time.

## **6.0 Data Sharing and Accuracy**

### **6.1 Which entity or entities inside and external to the City will be data sharing partners?**

Data obtained from the technology may be shared outside SPD with the other agencies, entities, or individuals within legal guidelines or as required by law.

Data may be shared with outside entities in connection with criminal prosecutions:

- Seattle City Attorney’s Office
- King County Prosecuting Attorney’s Office
- King County Department of Public Defense
- Private Defense Attorneys
- Seattle Municipal Court
- King County Superior Court
- Similar entities where prosecution is in Federal or other State jurisdictions

Data may be made available to requesters pursuant to the Washington Public Records Act, [Chapter 42.56 RCW](#) (“PRA”). SPD will apply applicable exemptions to the data before disclosing it to a requester. Individuals have the right to inspect criminal history record information maintained by the department ([RCW 10.97.030](#), [SPD Policy 12.050](#)). Individuals can access their own information by submitting a public disclosure request.

Per [SPD Policy 12.080](#), the Crime Records Unit is responsible for receiving, recording, and responding to requests “for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies.”

Discrete pieces of data collected by CCTV cameras may be shared with other law enforcement agencies in wanted bulletins, in connection with law enforcement investigations jointly conducted with those agencies, or in response to requests from law enforcement agencies investigating criminal activity as governed by [SPD Policy 12.050](#) and [12.110](#). All requests for data from Federal Immigration and Customs Enforcement (ICE) authorities are referred to the Mayor’s Office Legal Counsel in accordance with the Mayoral Directive, dated February 6, 2018.

SPD shares data with authorized researchers pursuant to properly executed research and confidentiality agreements as provided by [SPD Policy 12.055](#). This sharing may include discrete pieces of data related to specific investigative files collected by the devices.

## 6.2 Why is data sharing necessary?

Data sharing is necessary for SPD to fulfill its mission of contributing to crime reduction by assisting in collecting evidence related to serious and/or violent criminal activity as part of investigations, and to comply with legal requirements.

## 6.3 Are there any restrictions on non-City data use?

Yes ☒ No ☐

### 6.3.1 If you answered yes, provide a copy of the department’s procedures and policies for ensuring compliance with these restrictions.

Law enforcement agencies receiving criminal history information are subject to the requirements of [CFR Title 28, Part 20](#), regulating criminal justice information systems. In addition, Washington State law enforcement agencies are subject to the provisions of [WAC 446-20-260 \(auditing and dissemination of criminal history record information systems\)](#), and [RCW Chapter 10.97 \(Washington State Criminal Records Privacy Act\)](#).

Once disclosed in response to PRA request, there are no restrictions on non-City data use; however, applicable exemptions will be applied prior to disclosure to any requestor who is not authorized to receive exempt content.

## 6.4 How does the project/technology review and approve information sharing agreements, memorandums of understanding, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies?

Sharing agreements must meet the standards reflected in [SPD Policy 12.055](#). Law enforcement agencies receiving criminal history information are subject to the requirements of [CFR Title 28, Part 20](#). In addition, Washington State law enforcement agencies are subject to the provisions of [WAC 446-20-260](#), and [RCW Chapter 10.97](#).

Following Council approval of this SIR, SPD must seek Council approval for any material change to the purpose or manner in which the CCTV cameras may be used.

**6.5 Explain how the project/technology checks the accuracy of the information collected. If accuracy is not checked, please explain why.**

CCTV cameras capture and record video of what is occurring within the range of the cameras. The devices do not check for accuracy.

In regard to overall outcomes, the goals of this project are:

1. Reduction in gun violence, human trafficking, and other persistent felony crimes in selected areas.
2. Reduction in 911 calls in selected areas.
3. To minimize crime displacement outside of selected areas.
4. Improved police response times, crime clearance rates, and community satisfaction measures.

SPD will also report the rate of arrests and prosecutions that occur as a result of the initial pilot and any negative unintended consequences, such as over or under policing.

The program will be data-informed and guided. It will terminate if data suggests the technology is ineffective. Utilizing the abilities of the Performance Analytics and Research Unit, the Seattle Police Department has a plan to actively manage performance measures reflecting the “total cost of ownership of public safety,” Equity, Accountability, and Quality (“EAQ”), which includes measures of disparate impact and over-policing. In addition to a robust Continuous Intervention Assessment designed to inform, in real-time, the active development of a safer, more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures just right policing is achieved with undue collateral harm.

**6.6 Describe any procedures that allow individuals to access their information and correct inaccurate or erroneous information.**

Individuals may request records pursuant to the PRA, and individuals have the right to inspect criminal history record information maintained by the department ([RCW 10.97.030](#), [SPD Policy 12.050](#)). Individuals can access their own information by submitting a public disclosure request.

## **7.0 Legal Obligations, Risks and Compliance**

**7.1 What specific legal authorities and/or agreements permit and define the collection of information by the project/technology?**

When reasonable suspicion of criminal activity exists, the CCTV cameras will be placed to capture events in plain view in public areas.

**7.2 Describe what privacy training is provided to users either generally or specifically relevant to the project/technology.**

[SPD Policy 12.050](#) mandates that all SPD employees receive Security Awareness Training (Level 2), and all employees also receive City Privacy Training.

**7.3 Given the specific data elements collected, describe the privacy risks identified and for each risk, explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.**

Privacy risks revolve around improper collection of images of members of the general public. As it relates to CCTV recording, all CCTV cameras will face toward the street, sidewalk, and other public areas. Signs acknowledging the use of the cameras will be posted and street fliers will be distributed.

[SMC 14.12](#) and [SPD Policy 6.060](#) directs all SPD personnel that any documentation of information concerning a person's sexual preferences or practices, or their political or religious activities must be for a relevant reason and serve a legitimate law enforcement purpose. The purpose of policy 6.060 is "to ensure that the collection and review of such information serves a legitimate law enforcement purpose and does not unreasonably infringe upon individual rights, liberties, and freedoms secured by the Constitution of the United States and of the State of Washington, including, among others, the freedom of speech, press, association and assembly; liberty of conscience; the exercise of religion; and the right to petition government for redress of grievances; or violate an individual's right to privacy." SPD only documents sexual preferences or practices, political or religious activities if it is related to unlawful act, for example, a child pornography investigation.

Additionally, [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior, as well as accountability measures. The policy states that "employees shall not make decisions or take actions that are influenced by bias, prejudice, or discriminatory intent. Law enforcement and investigative decisions must be based upon observable behavior or specific intelligence," as well as outlining specifics related to this area.

Finally, see 5.3 for a detailed discussion about procedures related to noncompliance.

**7.4 Is there any aspect of the project/technology that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?**

Inherent in video obtained through CCTV cameras is the risk that private information may be obtained about members of the public without their knowledge. This risk and those privacy risks outlined in section 7.3 above are mitigated by legal requirements and auditing processes that allow for the Office of Inspector General to inspect the use and deployment of CCTV cameras.

## 8.0 Monitoring and Enforcement

### 8.1 Describe how the project/technology maintains a record of any disclosures outside of the department.

Sharing of recorded video is primarily done through SPD's digital evidence management system. Records of when data was shared and who it is shared with is noted in the system audit logs. Digital evidence shared outside of the digital evidence management system (e.g., using media such as DVDs, thumb drives, etc. is done through SPD's Digital Forensic Unit, which logs requests.

Per [SPD Policy 12.080](#), the Crime Records Unit is responsible to receive and record all requests "for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies."

Any requests for public disclosure are logged by SPD's Public Disclosure Unit. Any action taken, and data released subsequently, is then tracked through the request log. Responses to Public Disclosure Requests, including responsive records provided to a requestor, are retained by SPD for two years after the request is completed.

### 8.2 What auditing measures are in place to safeguard the information, and policies that pertain to them, as well as who has access to the audit data? Explain whether the project/technology conducts self-audits, third party audits or reviews.

OIG conducts independent audits of SPD as instructed by the City Council and by City ordinance.

## Financial Information

### Purpose

This section provides a description of the fiscal impact of the surveillance technology, as required by the surveillance ordinance.

### 1.0 Fiscal Impact

Provide a description of the fiscal impact of the project/technology by answering the questions below.

#### 1.1 Current or potential sources of funding: initial acquisition costs.

Current ☒ potential ☒

| Date of initial acquisition | Date of go live | Direct initial acquisition cost | Professional services for acquisition | Other acquisition costs | Initial acquisition funding source |
|-----------------------------|-----------------|---------------------------------|---------------------------------------|-------------------------|------------------------------------|
| Q4 2024                     | Q2 2025         | \$1,100,000                     | \$250,000                             | \$50,000                | General Fund                       |
|                             |                 |                                 |                                       |                         |                                    |

Notes:

Please consult the material update summary and fiscal note.

#### 1.2 Current or potential sources of funding: on-going operating costs, including maintenance, licensing, personnel, legal/compliance use auditing, data retention and security costs.

Current ☐ potential ☒

| Annual maintenance and licensing | Legal/compliance, audit, data retention and other security costs | Department overhead | IT overhead | Annual funding source |
|----------------------------------|------------------------------------------------------------------|---------------------|-------------|-----------------------|
| \$30,000                         | TBD                                                              | TBD                 | TBD         | General Fund          |

Notes:

#### 1.3 Cost savings potential through use of the technology

The use of CCTV may help mitigate SPD's shortage of sworn staffing by more effectively deploying patrol resources to incidents and follow-up investigations. However, use of the CCTV and the other related technologies being assessed does not necessarily correlate to direct cost savings.

#### 1.4 Current or potential sources of funding including subsidies or free products offered by vendors or governmental entities.

No funding beyond city General Fund dollars have been identified for this technology.

## Expertise and References

### Purpose

The following information is provided to ensure that Council has a group of experts to reference while reviewing the completed surveillance impact report (“SIR”). Any individuals or agencies referenced must be made aware ahead of publication that their information has been included. All materials must be available for Council to access or review, without requiring additional purchase or contract.

### 1.0 Other Government References

Please list any other government bodies that have implemented this technology and can speak to the implementation of this technology.

| Agency, municipality, etc. | Primary contact | Description of current use |
|----------------------------|-----------------|----------------------------|
| Atlanta                    |                 | Currently in use           |
| Baltimore                  |                 | Currently in use           |
| Berkeley                   |                 | Currently in use           |
| Chicago                    |                 | Currently in use           |
| Los Angeles                |                 | Currently in use           |
| New York                   |                 | Currently in use           |
| Philadelphia               |                 | Currently in use           |
| Phoenix                    |                 | Currently in use           |
| Portland                   |                 | Currently in use           |
| San Diego                  |                 | Currently in use           |
| San Francisco              |                 | Currently in use           |

### 2.0 Academics, Consultants, and Other Experts

Please list any experts in the technology under consideration, or in the technical completion of the service or function the technology is responsible for.

| Agency, municipality, etc. | Primary contact | Description of current use |
|----------------------------|-----------------|----------------------------|
|                            |                 |                            |

### 3.0 White Papers or Other Documents

Please list any publication, report or guide that is relevant to the use of this technology or this type of technology.

| Title                                                                                                                                            | Publication                                              | Link                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| CCTV Surveillance for Crime Prevention: A 40-Year Systematic Review with Meta-Analysis                                                           | <i>Criminology &amp; Public Policy</i><br>18(1): 135-159 | <a href="#">CCTV Surveillance for Crime</a>                                                             |
| Evaluating the Effect of CCTV on Crime Occurrence and Case Clearances in Fayetteville, North Carolina: A Microsynthetic Control Quasi-Experiment | CUNY                                                     | <a href="https://academicworks.cuny.edu/gc_etds/5467/">https://academicworks.cuny.edu/gc_etds/5467/</a> |
| <a href="#">The effect of public surveillance cameras on crime clearance rates</a>                                                               | SocArXiv Papers                                          | <a href="https://osf.io/preprints/socarxiv/eh5bg">https://osf.io/preprints/socarxiv/eh5bg</a>           |

# Racial Equity Toolkit (“RET”) and engagement for public comment worksheet

## Purpose

Departments submitting a SIR are required to complete an adapted version of the Racial Equity Toolkit (“RET”) in order to:

- Provide a framework for the mindful completion of the SIR in a way that is sensitive to the historic exclusion of vulnerable and historically underrepresented communities. Particularly, to inform the public engagement efforts departments will complete as part of the surveillance impact report.
- Highlight and mitigate any impacts on racial equity from the adoption and the use of the technology.
- Highlight and mitigate any disparate impacts on individuals or vulnerable communities.
- Fulfill the public engagement requirements of the surveillance impact report.

In addition to completing the RET template sections below, the 2024 Council Budget Action SPD-900-A requested that the Executive, the Office for Civil Rights (OCR) and the Inspector General for Public Safety (OIG) co-prepare a Racial Equity Toolkit (RET) analysis for these technologies, pursuant to the process that the Executive has already created to comply with the Surveillance Ordinance. Please see Appendix B: Office for Civil Rights RET Analysis.

## Adaptation of the RET for Surveillance Impact Reports

The RET was adapted for the specific use by the Seattle Information Technology Departments’ (“Seattle IT”) Privacy Team, the Office of Civil Rights (“OCR”), and Change Team members from Seattle IT, Seattle City Light, Seattle Fire Department, Seattle Police Department, and Seattle Department of Transportation.

## Racial Equity Toolkit Overview

The vision of the Seattle Race and Social Justice Initiative (“RSJI”) is to eliminate racial inequity in the community. To do this requires ending individual racism, institutional racism and structural racism. The RET lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity.

### 1.0 Set Outcomes

**1.1. Seattle City Council has defined the following inclusion criteria in the surveillance ordinance, and they serve as important touchstones for the risks departments are being asked to resolve and/or mitigate. Which of the following inclusion criteria apply to this technology?**

☐ The technology disparately impacts disadvantaged groups.

- ☐ There is a high likelihood that personally identifiable information will be shared with non-City entities that will use the data for a purpose other than providing the City with a contractually agreed-upon service.
- ☒ The technology collects data that is personally identifiable even if obscured, de-identified, or anonymized after collection.
- ☒ The technology raises reasonable concerns about impacts to civil liberty, freedom of speech or association, racial equity, or social justice.

## **1.2 What are the potential impacts on civil liberties through the implementation of this technology? How is the department mitigating these risks?**

The information presented in this RET is specific to the initial pilot areas of Aurora Ave. N, Chinatown/International District, and the 3<sup>rd</sup> Ave./Downtown Core.

Gun violence, human trafficking, and other persistent felony crimes are concentrated at specific geographic places in the city. This concentrated crime is often anchored at these places and requires a holistic crime-prevention strategy.

The Crime Prevention Technology pilot is one integrated component to this overall strategy of addressing this issue. These technologies will be coupled with police patrols, continued investments in community-based initiatives, enhanced lighting, and enhanced cleaning.

The technology will be used for the following purposes:

- Closed-Circuit (CCTV) camera systems will assist investigators in collecting evidence related to serious and violent crimes, including homicides, assaults, and other offenses. The CCTV system can aid investigators in identifying suspects, clearing the innocent, and removing deadly weapons from the street, thereby reducing the risk of harm to the public. It will also be used in real-time to assist coordination and deployment of patrol and specialty unit resources. For example, camera feeds in the Real-Time Crime Center can be used to assess the severity of incidents and either increase or decrease the resources dispatched to the scene accordingly.
- Real-Time Crime Center (RTCC) software helps provide situational awareness to increase officers' and the public's safety and reactively investigate incidents. Having real-time, accurate information in one place helps increase the reliability of the location of victims and suspects, enabling quicker aid and safer apprehension. Having better visual and spatial suspect information will help reduce unnecessary stops by officers, focusing their efforts on verified locations and accurate descriptions.

Potential impacts on civil liberties include but are not limited to:

- Privacy concerns associated with surveillance of people, vehicles, and license plates in public places.
- Misuse of collected video and information/mission creep.
- Lack of transparency with the public on what is being done with recordings.
- Loss of personal autonomy with surveillance of an area.

To mitigate these potential community concerns, SPD will:

- Post signs indicating that police surveillance and video recordings are occurring.
- Ensure technology is being used for crimes related to gun violence, human trafficking, and other persistent crimes in the surveillance area.
- SPD will create a public-facing dashboard that will update frequently and report on the uses of the technologies, including areas where cameras are recording, and the resulting number of police actions, such as arrests, court-authorized warrants, recovery of stolen vehicles, or other law enforcement actions.
- CCTV technology will only monitor public places, such as sidewalks, streets, and parks.
- Recorded material will only be kept for 30 days unless it is evidence of criminal behavior, in which case it will be transferred to SPD's secure digital evidence storage system.
- Provide access to CCTV, ALPR, and SPD's Real Time Crime Center (RTCC) user and device logs to the Office of Inspector General (OIG) for compliance audits.
- Limit access to essential SPD personnel and accountability partners.
- The Office of the Inspector General will have full access to the RTCC operation.

Additionally, the technologies will only be implemented once the City's surveillance ordinance requirements are met and the City Council authorizes the use.

### **1.3 What are the risks for racial or ethnicity-based bias through each use or deployment of this technology? How is the department mitigating these risks?**

*Include a description of any issues that may arise such as algorithmic bias or the possibility for ethnic bias to emerge in people and/or system decision-making.*

The mission of the Seattle Police Department is to prevent crime, enforce the law, and support quality public safety by delivering respectful, professional, and dependable police services. [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior and other accountability measures. This pilot will be data-informed and guided. It will terminate if data suggests the technology is ineffective. Utilizing the abilities of the Performance Analytics and Research Unit, the Seattle Police Department has a plan to actively manage performance measures reflecting the "total cost of ownership of public safety," Equity, Accountability, and Quality ("EAQ"), which includes measures of disparate impact and over policing. In addition to a robust Continuous Intervention Assessment designed to inform, in real-time, the active development of a safer and more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures just

right policing is achieved with undue collateral harm.

It's worth noting that many factors can contribute to disparate impacts in policing, most of which occur early in a person's life, long before there is engagement with the police. For example, systems and policies that perpetuate poverty, the failure to provide children with the strong and fair start they deserve in the crucial birth-to-five years, inadequate public education, and a lack of economic opportunity can all contribute to disparate outcomes. In addition, family dynamics and peer pressure can also create negative outcomes. We recognize these factors and strive to do our part to mitigate them, but we can't expect our police officers by themselves to cure these contributory factors. However, we do expect our officers to do their jobs respectfully and fairly as they interact with community members.

These technologies are location-specific, with a place-based focus, meaning they will record people who choose to be in a public place where the technologies are being used. This mitigating factor reduces, to an extent, the possible disparate impact of potential police actions.

#### 1.4 Where in the City is the technology used or deployed?

The following neighborhoods are being considered for deploying the CCTV technologies. Specific areas will be selected based on the data analysis indicating where gun violence, human trafficking, and persistent felony crimes are concentrated.

☐ all Seattle neighborhoods

☒ **Aurora Ave N 85th to 145th**

☐ Ballard

☒ **Belletown**

☐ Beacon Hill

☐ Capitol Hill

☐ Central District

☒ **Chinatown/International District**

☐ Columbia City

☒ **Downtown Commercial Core**

☐ Delridge

☐ First Hill

☐ Georgetown

☐ Greenwood / Phinney

☐ International District

☐ Interbay

☐ North

☐ Northeast

☐ Northwest

☐ Madison Park / Madison Valley

☐ Magnolia

☐ Rainier Beach

☐ Ravenna / Laurelhurst

☐ South Lake Union / Eastlake

☐ Southeast

☐ Southwest

☐ South Park

☐ Wallingford / Fremont

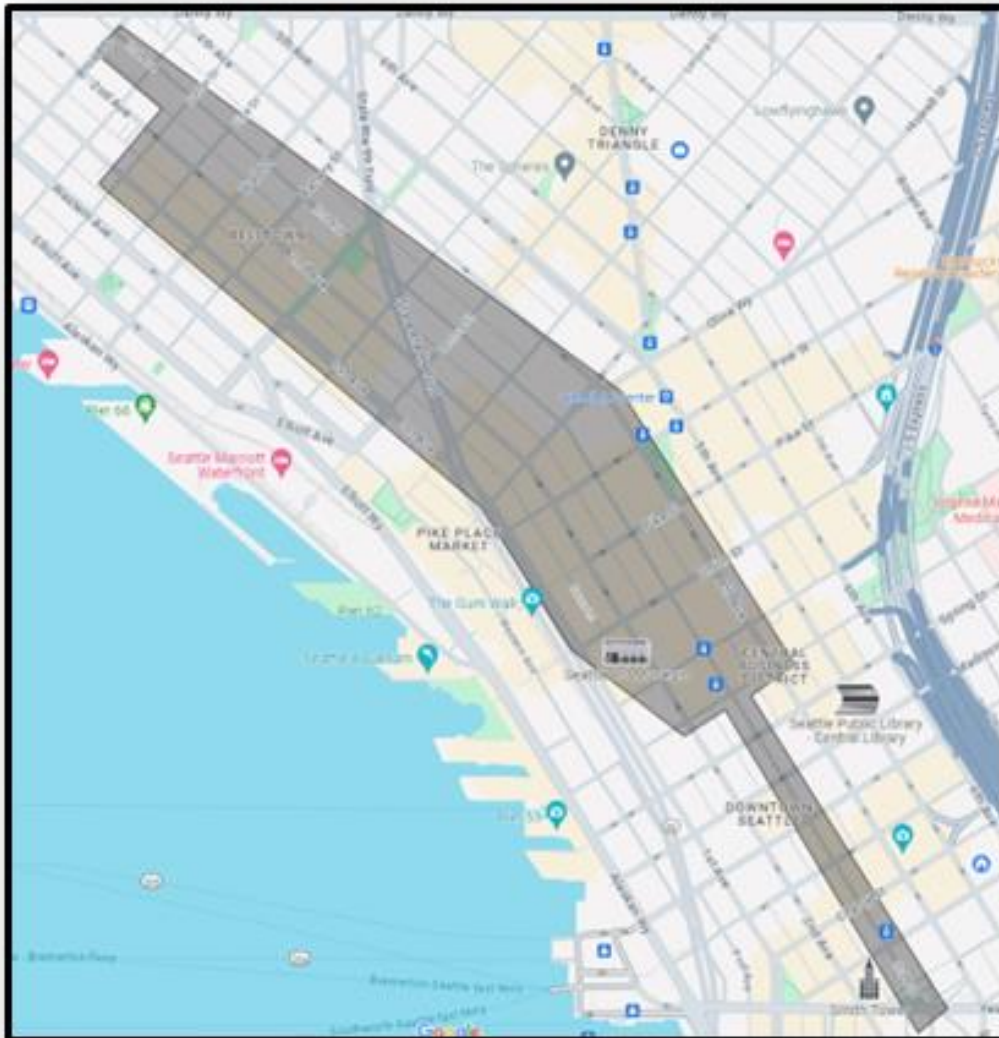
☐ West Seattle

☐ King county (outside Seattle) (Mutual Aid)

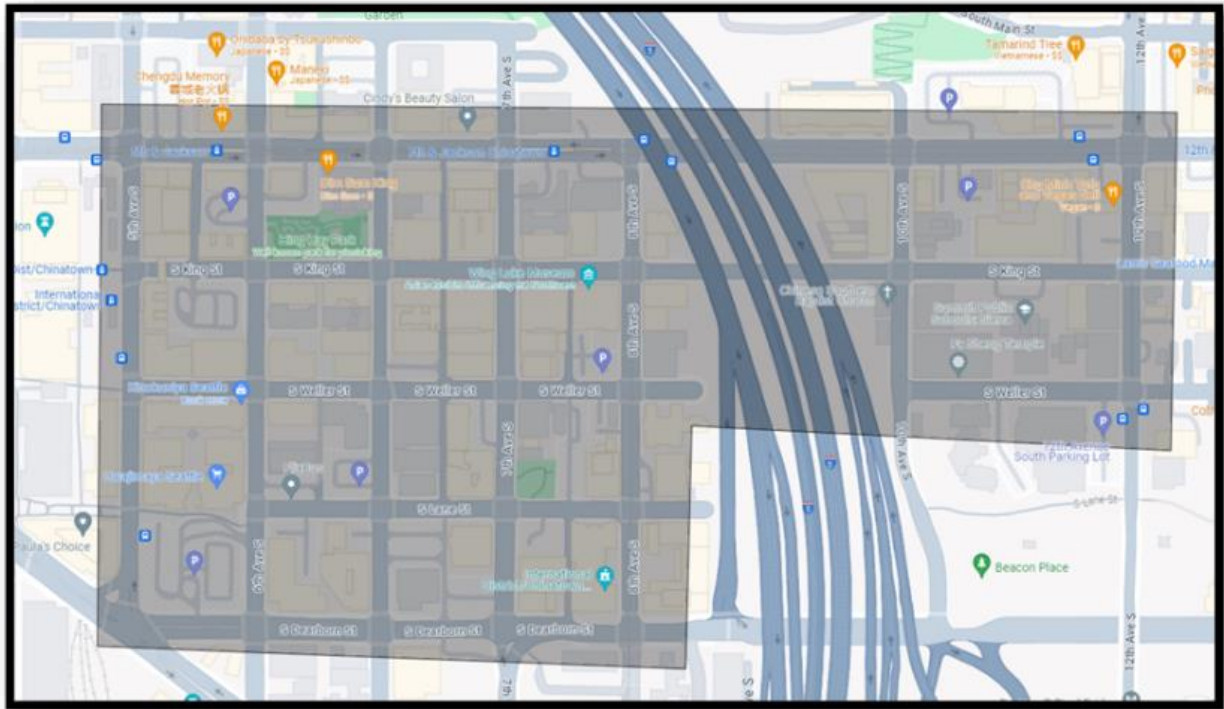
☐ Outside King County (Mutual Aid)

If possible, please include any maps or visualizations of historical deployments / use.

## Downtown & Belltown Area



## Chinatown-International District Area



## Aurora Avenue North Corridor (Aurora Ave, 85<sup>th</sup> to 145<sup>th</sup> Streets)



#### 1.4.1 What are the racial demographics of those living in this area or impacted by these issues?

| Race/Ethnicity                                                                                                                                                                                                                                                                                                                                                                        | Aurora | Chinatown<br>International District | Belltown | Downtown<br>Commercial | Citywide |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------------------|----------|------------------------|----------|
| American Indian<br>or Alaska Native                                                                                                                                                                                                                                                                                                                                                   | 0.8%   | 0.7%                                | 0.6%     | 1.1%                   | 0.4%     |
| Asian                                                                                                                                                                                                                                                                                                                                                                                 | 14.0%  | 49.2%                               | 30.4%    | 16.8%                  | 16.9%    |
| Black/African<br>American                                                                                                                                                                                                                                                                                                                                                             | 8.9%   | 8.6%                                | 5.5%     | 11.1%                  | 6.8%     |
| Hispanic or<br>Latino of Any<br>Race                                                                                                                                                                                                                                                                                                                                                  | 11.3%  | 7.6%                                | 7.1%     | 8.3%                   | 8.2%     |
| Native Hawaiian<br>or Pacific<br>Islander                                                                                                                                                                                                                                                                                                                                             | 0.3%   | 0.2%                                | 0.2%     | 0.3%                   | 0.3%     |
| Other                                                                                                                                                                                                                                                                                                                                                                                 | 0.7%   | 0.7%                                | 0.6%     | 0.7%                   | 0.6%     |
| Multiple Races                                                                                                                                                                                                                                                                                                                                                                        | 7.9%   | 5.8%                                | 4.9%     | 5.6%                   | 7.3%     |
| White                                                                                                                                                                                                                                                                                                                                                                                 | 56.2%  | 27.2%                               | 50.8%    | 56.1%                  | 59.5%    |
| <p>Source: U.S. Census Bureau Decennial Census; OPCD</p> <p>Note: Geographical areas provided are <u>2020 Census Block Assignments of <a href="#">Urban Villages</a></u> within the Downtown Urban Center, with the exception of Aurora. Aurora's boundaries are based on ½ mile buffer from Aurora between Meridian and Greenwood, and from 85<sup>th</sup> to 145<sup>th</sup>.</p> |        |                                     |          |                        |          |

**1.4.2 How does the Department to ensure diverse neighborhoods, communities, or individuals are not specifically targeted through the use or deployment of this technology?**

CCTV will be deployed where crimes related to gun violence, human trafficking, and other persistent felony crimes are concentrated. [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior, as well as other accountability measures. This technology does not enhance the risks of racial or ethnicity-based bias.

These technologies are geographically focused on specific areas where gun violence, human trafficking, and other persistent felony crimes are concentrated. They are focused on individuals only if they are present in these areas.

**1.5 How do decisions around data sharing have the potential for disparate impact on historically targeted communities? What is the department doing to mitigate those risks?**

Data from the technology may be shared outside SPD with other agencies, entities, or individuals within legal guidelines or as required by law. Data may be shared with outside entities in connection with criminal prosecutions.

Data may be made available to requesters under the Washington Public Records Act, Chapter 42.56 RCW ("PRA").

Data sharing has the potential to be a contributing factor to disparate impact on historically marginalized communities. To mitigate this possibility, SPD has established policies regarding disseminating data related to criminal prosecutions, Washington Public Records Act (Chapter 42.56 RCW), and authorized researchers. Further, [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior.

**1.6 How do decisions around data storage and retention have the potential for disparate impact on historically targeted communities? What is the department doing to mitigate those risks?**

As with decisions around data sharing, data storage and data retention have similar potential for disparate impact on historically marginalized communities. CCTV will be deployed where crimes related to gun violence, human trafficking, and other persistent felony crimes are concentrated. Video from CCTVs will be stored for 30 days unless imagery is needed for investigations or to comply with legal requirements. Further, [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior, and other accountability measures.

**1.7 What are potential unintended consequences (both negative and positive potential impact)? What proactive steps can you can / have you taken to ensure these consequences do not occur.**

The most important unintended possible negative consequence related to the implementation of CCTVs and RTCC is the possibility that the civil rights of individuals may be compromised by unreasonable surveillance. To mitigate this risk, SPD is enacting a specific policy codifying the allowable circumstances under which SPD may utilize CCTVs and Real-Time Crime Center software. Access to user and device logs will be given to the OIG so they can audit the use of these technologies.

To prevent unintended outcomes, the City will develop signage in areas that are covered by the cameras' view to alert the public to their presence and use. Additionally, the Office of the Inspector General will have access at any time to monitor and evaluate the use of these technologies. During the public outreach sessions described below, the City will listen to feedback from the public and provide responses during the technology review process.

The potential positive impact will be reduced serious crime concentrated in the locations where the technologies are deployed. If achieved, these reductions will create a safer environment for everyone who lives, works, plays, or visits these areas.

SPD is developing an omnibus surveillance technology policy to provide general guidance on several topics, including value and equity statements for technology use, an explanation of the surveillance ordinance requirements, internal processes for technology approval and acquisition, general tracking metrics for surveillance technologies, retention requirements and limitations, and general use requirements for surveillance technologies.

## **2.0 Public Outreach**

SMC 14.18 does not require material updates to go through the same process as the original SIR.

## **3.0 Public Comment Analysis**

The public comment period was June 3, 2025 to June 23, 2025.

### **3.1 Summary of Response Volume**

Please see Appendix B.

### **3.2 Question One: What concerns, if any, do you have about the use of this technology?**

Please see Appendix B.

### **3.3 Question Two: What value, if any, do you see in the use of this technology?**

Please see Appendix B.

### **3.4 Question Three: What would you want City leadership to consider when making a decision about the use of this technology?**

Please see Appendix B.

### 3.5 Question Four: General response to the technology.

Please see Appendix B.

### 3.5 General Surveillance Comments

These are comments received that are not particular to any technology currently under review.

Please see Appendix B.

## 4.0 Response to Public Comments

### 4.1 How will you address the concerns that have been identified by the public?

Concerns that have been raised through public comment and engagement will be addressed in SPD policy. SPD is developing an omnibus surveillance technology policy to provide general guidance on several topics, including value and equity statements for technology use, an explanation of the surveillance ordinance requirements, internal processes for technology approval and acquisition, general tracking metrics for surveillance technologies, retention requirements and limitations, and general use requirements for surveillance technologies. Additionally, issues and guidance unique to specific surveillance technologies would be included for each technology. As such, the department will create a policy section for CCTV.

## 5.0 Equity Annual Reporting

### 5.1 What metrics for this technology be reported to the CTO for the annual equity assessments?

The goals of this project are:

1. Reduction in gun violence, human trafficking, and other persistent felony crimes in the pilot area.
2. Reduction in 911 calls in the pilot area.
3. To minimize crime displacement outside of the pilot area.
4. Improved police response times, crime clearance rates, and community satisfaction measures.

We will also report the rate of arrests and prosecutions that occur as a result of the pilot and any negative unintended consequences, such as over or under policing.

The Seattle Police Department, utilizing the Data Analytics Team and working with the Office of the Inspector General, will monitor these objectives and the outcomes closely to watch for disparate impacts. If data analysis shows any disparate impacts, SPD will work with the the Office of the Inspector General to make the needed changes to address these impacts. Further, the City will retain outside academic subject matter experts to develop and manage an evaluation plan related to the use of the technologies.

## Privacy and Civil Liberties Assessment

### Purpose

This section shall be completed after public engagement has concluded and the department has completed the racial equity toolkit section above. The privacy and civil liberties assessment is completed by the community surveillance working group (“working group”), per the surveillance ordinance which states that the working group shall:

“Provide to the executive and the City Council a privacy and civil liberties impact assessment for each SIR that must be included with any departmental request for surveillance technology acquisition or in-use approval. The impact assessment shall include a description of the potential impact of the surveillance technology on civil rights and liberties and potential disparate impacts on communities of color and other marginalized communities. The CTO shall share with the working group a copy of the SIR that shall also be posted during the period of public engagement. At the conclusion of the public engagement period, the CTO shall share the final proposed SIR with the working group at least six weeks prior to submittal of the SIR to Council for approval. The working group shall provide its impact assessment in writing to the executive and the City Council for inclusion in the SIR within six weeks of receiving the final proposed SIR. If the working group does not provide the impact assessment before such time, the working group must ask for a two-week extension of time to City Council in writing. If the working group fails to submit an impact statement within eight weeks of receiving the SIR, the department and City Council may proceed with ordinance approval without the impact statement.”

### Working Group Privacy and Civil Liberties Assessment

SMC 14.18 does not require material updates to go through the same process as the original SIR. Please consult [Ordinance 127110](#) adopted by the City Council on 10/08/24 to view the original Privacy and Civil Liberties Assessment.

## Appendix A: Glossary

**Accountable:** (taken from the racial equity toolkit.) Responsive to the needs and concerns of those most impacted by the issues you are working on, particularly to communities of color and those historically underrepresented in the civic process.

**Community outcomes:** (taken from the racial equity toolkit.) The specific result you are seeking to achieve that advances racial equity.

**Contracting equity:** (taken from the racial equity toolkit.) Efforts to achieve equitable racial outcomes in the way the City spends resources, including goods and services, consultants and contracting.

**DON:** “department of neighborhoods.”

**Immigrant and refugee access to services:** (taken from the racial equity toolkit.) Government services and resources are easily available and understandable to all Seattle residents, including non-native English speakers. Full and active participation of immigrant and refugee communities exists in Seattle’s civic, economic and cultural life.

**Inclusive outreach and public engagement:** (taken from the racial equity toolkit.) Processes inclusive of people of diverse races, cultures, gender identities, sexual orientations and socio-economic status. Access to information, resources and civic processes so community members can effectively engage in the design and delivery of public services.

**Individual racism:** (taken from the racial equity toolkit.) Pre-judgment, bias, stereotypes about an individual or group based on race. The impacts of racism on individuals including white people internalizing privilege, and people of color internalizing oppression.

**Institutional racism:** (taken from the racial equity toolkit.) Organizational programs, policies or procedures that work to the benefit of white people and to the detriment of people of color, usually unintentionally or inadvertently.

**OCR:** “Office for Civil Rights.”

**Opportunity areas:** (taken from the racial equity toolkit.) One of seven issue areas the City of Seattle is working on in partnership with the community to eliminate racial disparities and create racial equity. They include: education, health, community development, criminal justice, jobs, housing, and the environment.

**Racial equity:** (taken from the racial equity toolkit.) When social, economic and political opportunities are not predicted based upon a person’s race.

**Racial inequity:** (taken from the racial equity toolkit.) When a person's race can predict their social, economic, and political opportunities and outcomes.

**RET:** "racial equity toolkit"

**Seattle neighborhoods:** (taken from the racial equity toolkit neighborhood.) Boundaries defined for the purpose of understanding geographic areas in Seattle.

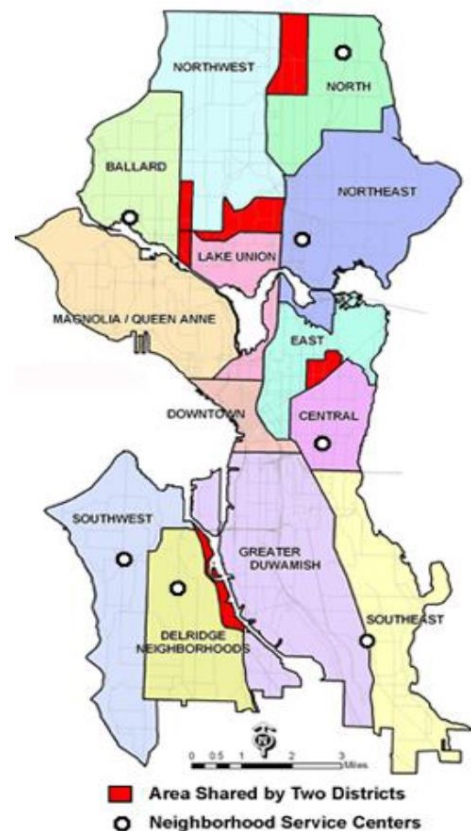
**Stakeholders:** (taken from the racial equity toolkit.) Those impacted by proposed policy, program, or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ethnic groups, other institutions like Seattle housing authority, schools, community-based organizations, change teams, City employees, unions, etc.

**Structural racism:** (taken from the racial equity toolkit.) The interplay of policies, practices and programs of multiple institutions which leads to adverse outcomes and conditions for communities of color compared to white communities that occurs within the context of racialized historical and cultural conditions.

**Surveillance ordinance:** Seattle City Council passed ordinance [125376](#), also referred to as the "surveillance ordinance."

**SIR:** "surveillance impact report", a document which captures the fulfillment of the Council-defined surveillance technology review process, as required by ordinance [125376](#).

**Workforce equity:** (taken from the racial equity toolkit.) Ensure the City's workforce diversity reflects the diversity of Seattle.



## **Appendix B: Public Comment Period (6/03/25 to 6/23/25)**

## CCTV 2025 Material Change, public comment received via Privacy Inbox

June 23rd, 2025

Dear Seattle City Leadership,

Here is my public comment on the SPD Closed-Circuit Television Camera Systems (CCTV) Surveillance Impact Report (SIR) currently going through the Material Update process.

I've provided my concerns and recommendations below in order of severity. You will find that the negatives far exceed any possible positives and as such **my overall recommendation is that the City of Seattle not deploy any CCTV and all the material updates to the system should be rescinded.**

Concerns & Recommendations:

- 1) SPD lied to the public and City Council: SPD never intended for the CCTV system to be a pilot.
  - (a) The original SPD CCTV SIR was approved in October 2024. The wording in the original SPD CCTV SIR and the presentations by SPD to the public and to City Council described the CCTV system as a "pilot" (and verbally SPD also called it an "experiment") that would include data analysis and reporting back at the 1-year and 2-year marks; and that the pilot program would be terminated if the data suggests the technology is ineffective.
  - (b) The first SPD CCTV cameras were mounted in the CID as of at least May 5th, 2025 and the whole SPD CCTV program was supposed to go live on May 20th, 2025.
  - (c) The RTCC & CCTV material update process opened for public comment on June 3rd. This means that most of the cameras had only been up for 14 days and the longest any camera had been installed was still less than a full month.
  - (d) The updates to the SPD CCTV SIR includes both expanding the geographic footprints that will have these surveillance cameras across the City and making the SPD CCTV system permanent, not a pilot anymore. So not only did SPD not wait to have even one year's worth of data but the timing of the release of the updated SIR to the public means that SPD had to have already been drafting the changes to make it permanent before even all so called pilot cameras were deployed.
  - (e) SPD just used the "pilot" as a way to have an easier-to-approve SIR go through the entire Surveillance Ordinance process while having the more contentious (expanded & permanent cameras) version go through the expedited Material Update process (which doesn't require Seattle IT to hold any public engagement meetings, doesn't have an updated RET, doesn't get reviewed by the Community Surveillance Working Group, and deletes the record-breaking amount of negative feedback the City received when the original SIR was being reviewed).
  - (f) SPD's deception is just hastening the erosion of any trust the community might have in the department. If your word means nothing - If you can't be honest in even your descriptions of your roadmap, then why should you ever be trusted to operate a surveillance technology?
- Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed) - no City department should be rewarded for lying to the public or City Council.
- 2) No efficacy: Existing data from a recent meta-analysis of the use CCTV systems, which is the same paper SPD referenced in their CCTV SIR, does not support deploying CCTV to reduce violent crime, as SPD proposes to do:
  - (a) Specifically, the 2019 paper by Eric L. Piza (of City University of New York (CUNY)) and et. al titled "CCTV surveillance for crime prevention. A 40-year systematic review with meta-

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analysis" [ <https://doi.org/10.1111/1745-9133.12419> ] states, "No significant effects were observed for violent crime or disorder" [Piza pdf page 21]; and instead that significant reductions were primarily seen in vehicle crime and property crime [Piza pdf page 20].

- (b) The paper also shows that the vast majority of studies that looked at CCTV deployed in city centers (as SPD plans to do) found either undesirable or no significant effect (in 26 out of 33 studies) [Piza pdf page 18] and that the largest & most consistent effects were for CCTV deployed within car parks [Piza pdf page 29], which is not what SPD plans to do.
- (c) SPD's framing of research as supporting their plan is (at best) misleading the public, since SPD didn't say (in SIR item 2.2) that the "specific crime problems in specific geographic places" where CCTV has been effective were regarding vehicle/property crime primarily in car parks.
- (d) In CCTV SIR item 2.2 SPD says, "The federal Department of Justice, the National Institute of Justice, and George Mason University's Center for Evidence Based Crime Policy rate the technology as 'promising'"; but SPD didn't cited where this rating is supposedly taken from. Given how misleading the other statements on efficacy of the technology are in the SIR, it's hard for the public to have trust regarding this statement.

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed) - there is no point to deploying an ineffective technology.

3) Not cost effective: Again, even the paper cited by SPD in the CCTV SIR doesn't support the cost trade-off for deploying CCTV systems:

- (a) The paper states, "Public safety agencies combatting violent crime problems may need to consider whether resources would be better allocated toward other crime prevention measures." [Piza pdf page 33]. It goes on to cover how also combining CCTV with Gunshot Detection Technology (GDT) did not improve results and was even more costly. Specifically, they stated, "... the introduction of GDT in Newark, New Jersey, did not improve active monitoring practices of CCTV. Given the high cost associated with technology, introducing additional camera operators and/or patrol officers into CCTV operations may be a more cost-effective measure than complementary crime control technologies" [Piza pdf page 34]
- (b) The updated Fiscal Impact section of the SIR shows an initial acquisition cost of \$1.175 million. As of June 22nd, 2025, SPD has 66 cameras spanning 3 geographic areas. That equals a cost of about \$17,803 per camera.
- (c) The material changes include adding three additional areas to be surveilled, which is a doubling of the distinct locations; but the actual geographic footprint (and therefore amount of cameras and their costs) could be quite larger than double given that at least 2 of the 3 new areas seems to likely cover a larger number of blocks than the prior locations (though this is unclear because SPD did not provide any maps of the proposed new areas nor any tally of the number of additional cameras proposed to be added). Even with a conservative estimate of simply doubling the costs, this would bring the initial acquisition to \$2.35 million.
- (d) Given the budget deficit the City is facing, it is unwise for the City to spend \$2.35 million to surveil residents instead of providing social services and funding community-driven, proven solutions to reducing gun violence.
- (e) This seems like a foot in the door for SPD to have an always ever increasing budget allocated to them to expand and deepen their surveillance. It will be a contract that is an investment in exceptionally costly, ineffective, reactive measures that are hard to remove and do nothing to actually help residents or reduce violence.

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed) - there are better uses of limited City funds.

4) Erosion of trust: Wide-spread deployment of CCTV will erode the trust individuals have in their neighbors and community. It creates the perception that everyone is watching them and they need to watch everyone else - that no place is safe. Just because certain public areas don't have an expectation of legal privacy does not mean they should instead have an expectation of surveillance (public or private). People should feel confident to move about their day throughout their community (irregardless of their geographic neighborhood) without feeling like their every move is being watched and recorded. The push towards this technology is also a push towards instilling a sense of paranoia.

- (a) Moreover, this also specifically causes an erosion of trust between SPD and the communities they serve because SPD is constantly lying. For example, SPD lied when they told the public during the IT's public engagement meetings that the cameras were not going to be live monitored and then immediately turned around and told City Council they would be (and that they'd need yet more additional funding for that). And SPD lied about the costs, which keeps ballooning every time they publicly discuss the technology. And SPD lied when they said it was a pilot program.

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed) - the City needs to build community trust, not erode it.

4) Racially-biased deployment: The Racial Equity Toolkit (RET) included inside the SIR hasn't been updated to reflect the additional locations added to be surveilled. This is on top of the many issues with the original RET itself:

- (a) The RET doesn't appear have been drafted in consult with the Office of Civil Rights, as required by City Council.
- (b) RET item 1.4.1 in the SIR shows disparate impact in the locations chosen to be surveilled. Specifically, there is disproportionate impact on Native American residents in 4 out of 4 of the pilot locations, Black residents in 3 of the pilot locations, Asian & Latinx residents in 2 of the pilot locations, and Mixed folks in 1 of the pilot locations. Additionally, while the majority of Seattle residents are white, all of the pilot locations have an under-proportionate amount of white residents - thus meaning the pilot locations selected appear on paper to be racially motivated. I don't see how the impact won't be biased-based policing because if you are only looking for crime in non-white neighborhoods, then you're primarily going to find non-white suspects (and victims); whereas criminals in white neighborhoods (who are therefore likely white themselves) will fly under the radar of the police.
- (c) RET item 1.4.2 in the SIRs states, "This technology does not enhance the risks of racial or ethnicity-based bias." SPD has not provided any explanation as to how deploying this technology in racially-biased locations won't generate racially-biased policing outcomes.
- (d) This is made worse by SPD's response to the RET question asking how they will mitigate the risks for racial bias in the deployment and SPD answered that these technologies "will record people who choose to be in a public place where the technologies are being used. This mitigating factor reduces, to an extent, the possible disparate impact of potential police actions." So SPD is basically saying that residents can avoid SPD police biases (and invasion of their privacy) by not going outside in public - you need to stay home if you don't want to be surveilled - that it's up to residents to protect themselves against SPD biases.
- (e) Only 1 of the 2 public engagement meetings on these surveillance technologies was held near a pilot location and the 1 location that was also happened to be the location with the highest amount of white residents out of the 4 pilot locations. Why can SPD find the time to talk to surveillance technology vendors and the City can find the money to surveil residents, but

somehow doesn't have the time nor the money to even have host a community event in all of the pilot locations?

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed) - racist behavior (including with technology) has no place in Seattle.

6) Enabling circumvention of Seattle & WA state laws: Women, trans folks, and immigrant residents are placed in increased harm by SPD's proposed CCTV:

- (a) For background, [WA HB 1469](#) was passed in 2023 and created a Shield Law in WA state (now under RCW 7.115). Among other things, the WA Shield Law prohibits WA state, local agencies, & law enforcement and WA-based companies & other private entities from providing information to, complying with subpoenas, or cooperating with an outside state related to bans or bounty hunting that state might have related to reproductive or gender-affirming healthcare.
- (b) And [WA SB 5497](#) was passed in 2019 and created the Keep Washington Working Act (now under multiple RCW sub-sections). Among other things, the Keep Washington Working Act restricts the extent to which local law enforcement agencies (such as SPD) may participate in enforcement of federal immigrant laws (such as by assisting ICE by collecting information about residents which may be undocumented).
- (c) SPD has confirmed that the video recordings will be streamed and recorded in the cloud (not on-premise with the City of Seattle).
- (d) Data stored off-premise (aka "in the cloud", "cloud-based", or "Software-as-a-Service", SaaS) is at risk of being subject to legal requests for that data directly from the platform provider by entities external to WA state. For example, a judge from Idaho could sign a subpoena/warrant that requests Axon Fusus (the proposed RTCC provider for SPD) to provide ALPR data for vehicles used by and/or CCTV recordings of people visiting Seattle who were suspected of having an abortion or assisting in providing trans healthcare. Or ICE could issue requests for ALPR and/or CCTV data specific to undocumented people that they believe might be in the Seattle area. Because Axon isn't a WA company, the data is not protected by the Shield Law; and because Fusus isn't a government law enforcement agency, the data is also not protected by the Keep WA Working Act.
- (e) The amendment that passed in Council that altered the contract language with Axon does not address these concerns either because state/federal laws will always be honored by a judge over simple contract language. Additionally, if the judge who signed the warrant also signed a gag order for those requests, then not only would SPD be unable to stop such information sharing but also Axon might be legally blocked from even disclosing that the request(s) exist to SPD (regardless of what the contract says).
- (f) These concerns are especially relevant now given the current administration and because SPD has already mounted a camera within range of viewing people who visit the Planned Parenthood on 105th and the Home Depot on Aurora.

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed) - SPD must not weaken state laws nor endanger women, trans folks, and immigrant residents. If City Council approves of this pilot anyways, then at a minimum, require that the CCTV data to be stored only on-premise.

7) Surveillance expansion: CCTV SIR item 1.1 states that "... privately-owned security systems will be able to voluntarily share video of storefronts and areas where the public has access with SPD." There are multiple concerns about this:

- (a) CCTV recordings from nearby business are already being used and leveraged by SPD during investigations, so continuously, on-going access to live video feeds from private entities is unnecessary.
- (b) SPD would have no control over technically ensuring that only camera feeds that are of publicly accessible areas are shared with SPD. For example, a business with multiple camera feeds may not consider that certain cameras the business has should not have their feeds shared with SPD since the viewing range includes non-public-facing locations. This could result in even further invasion of privacy beyond which even a reasonable judge would have granted outside the confines of specific time duration as part of a targeted investigation - thus elevating the surveillance ability of SPD beyond the oversight of the judicial branch.
- (c) SPD has provided zero information about if/how there will be any signs posted on \_private property\_ alerting the public that a \_private\_ video camera is being shared with SPD. This removes the ability for members of the public to provide even the facade of consent since they will have no way to be informed of what is happening and thus opt-out by leaving the area. This is especially troublesome since there is the potential for there to be more privately-owned cameras than SPD-owned ones, thus creating a large imbalance of the which cameras have signage and which don't.
- (d) SPD would have no control over when or where various private video feeds are added or removed from the system; nor would SPD have control over whether the video feeds have on-the-fly AI-generated overlays within the video stream content itself before the feed is made available to SPD - thus elevating the surveillance ability of SPD beyond both public scrutiny and the oversight supposedly enshrined via the Surveillance Ordinance (S.M.C. 14.18).

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, privately-owned CCTV videos (both live and recorded) should require a warrant signed by a judge before they can be viewed, accessed, or saved by SPD.

8) Location tracking: Some CCTV vendors advertise that they enable any generic camera connected to their CCTV system to automatically become an Automated License Plate Reader (ALPR) camera. This would turn all the connected CCTV cameras into also being fixed-point, mounted ALPR cameras. Many academic researchers have covered the multitude of harms from ALPR systems, including University of Washington's Center for Human Rights [ <https://jsis.washington.edu/humanrights/2022/12/07/whos-watching-washington/> ]. Broadly speaking, the mass collection of location data has been shown to cause: social, cultural, scientific, & economic harm; psychological harm; political and democratic harm; politically damaging disclosures, blackmail, & extortion; and actual repression by governments (among other issues). As such, any ALPR capabilities need to be explicitly disclosed to the public for review and City Council assessment, not secretly added-on behind the scenes as a feature of the CCTV system.

Recommendation: SPD must not deploy CCTV (not as a pilot program and certainly not any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, disallow the use of ALPR via the CCTV system (until SPD explicitly lists them in the SIR during an open public comment period and then receives approval to use them from City Council).

9) No limitations on use: Item 2.1 of the CCTV SIR says, "Serious felony crimes are often concentrated at specific geographic locations in Seattle and long-time efforts to prevent these crimes have not been consistently successful." However, nothing in the SIR limits the use of the CCTV data to only "serious felony crimes". This is a bait-and-switch tactic whereby SPD is using the public's fear of the scariest

sounding crimes to justify a surveillance technology that in practice will have unlimited use and very likely will instead commonly be used to harass those most often on-foot (poor folks, sex workers, homeless, tweens/minors, etc).

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, specify that the only allowable use of the CCTV system should be for felony crimes.

10) Undisclosed/Unapproved surveillance features: In item 2.3 of the CCTV SIR, when describing "Edge-Based Analytics capabilities", it says, "SPD will not use AI face recognition tools." However, face recognition isn't the only concern:

- (a) Gait recognition, behavior analysis, and emotion analysis would also be concerning functionalities that the system might have. None of those tools should be used on the CCTV video data.
- (b) Additionally, SPD hasn't confirmed that they will only use a CCTV product that allows them to disable such features system-wide. This is important because without it, it relies on each individual accessing the system not clicking the wrong buttons - meaning there is no technical guardrail; and past behavior from SPD has shown that individual employees are willing to violate both SPD Policy and the Surveillance Ordinance (i.e. [OPA Case 2020OPA-0305](#) and [OPA Case 2020OPA-0731](#)).
- (c) SPD has not disclosed to the public what are all the edge-based capabilities are they want to use, so it's impossible for the public to provide a critique of their accuracy (especially the possible racial and/or age-based biases of those). Since SPD didn't list any accuracy checks they will perform in item 6.5 of the SIR, it seems SPD expects the City to just trust whatever functionality the vendor provides - without any checks-and-balances on that.

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, all edge-based analytics capabilities in the CCTV system must be disabled until SPD explicitly lists them in the SIR during an open public comment period and then receives approval to use them from City Council.

11) Unclear signage: The mounted notifying people that there are police surveillance cameras in use near an address are unclear and inadequate. The signs are too small with too small of font and not in high enough contrast colors, so people who are low-vision probably won't be able to read them. The signs are also only posted in English (even the signs posted in the CID), and SPD has not provided any plan to provide for notification to blind residents (such as perhaps an auditory announcement or chime when walking within a certain range of the cameras).

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, font size & contrast should be increased and there must be an auditory alert of some kind near the location of each camera.

12) Excessive data retention: The CCTV SIR says that SPD plans to retain CCTV data for up to 30 days. This has multiple issues:

- (a) Retaining the CCTV data for such a long period of time enables stalkers to issue Public Records Act (PRA) requests (potentially repeatedly) for CCTV data to use against their victims.
- (b) It also means that bounty hunters from states outside of WA can use the PRA request process to get access to CCTV data without needing to issue a warrant. This is yet another way this

cameras, and inbound/outbound Internet access to the cameras disabled (so all network traffic must be local to the City's network - or as strong a network security configuration as possible in the architecture).

14) Training: Item 3.3 of the CCTV SIR says, "Authorized personnel will receive training in the CCTV video management system prior to authorization." and item 7.2 says, "SPD Policy 12.050 mandates that all SPD employees receive Security Awareness Training (Level 2), and all employees also receive City Privacy Training." SPD does not mention creating nor providing any privacy or ethics training specific to the CCTV system. There should be training that:

- (a) Advises that the cameras must not have their pan, tilt, or zoom altered to look inside private residences, to stalk/harass individuals, or to otherwise use the system for personal reasons)
- (b) And that CCTV operators must not move the camera's viewing angle away from an area of police response, while police are still present.

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, require the creation & utilization of privacy & ethics training specific to the CCTV, including covering examples of expressly forbidden use of the cameras.

Please seriously consider my public comment. Thank you.

technology enables outside jurisdictions to get around our Shield Law, which is meant to protect people coming to WA state for reproductive or gender-affirming care.

- (c) And it means that ICE can also use the PRA request process to get around Seattle's Sanctuary City policy, which was meant to protect our immigrant residents.
- (d) Meanwhile, SPD will have to pay the storage costs for all that unneeded, excessive data.
- (e) But 30 days is the maximum retention period, not the minimum, and the exact guidance in the retention schedule is "for 30 days after last recording or until determined that no security incident has occurred, whichever is sooner." It should not take SPD 30 days to figure out if a crime occurred at a given location. The SPD CAD and RMS data should be sufficient to somewhat quickly determine if a crime occurred (like say 48 hours, which is the data retention period requested by the Community Surveillance Working Group and City Council for SPD ALPR data, which would also be getting processed by the RTCC that will be handling the CCTV data).

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, limit data retention period to 48 hours for data not exported as evidence.

13) Security & Compliance:

- (a) Camera systems (both publicly & privately owned) have a long history of being exposed online and/or easily hacked. For example, at one point nearly 70 % of Washington D.C. MPD CCTVs had been hacked with ransomware. Frequently, not following security best practices as a pilot program and certainly not any of the material updates proposed is what has led to various cameras being hacked. This is worrisome given that SPD was found to not be following all the security best practices for their evidence storage [see [Clerk File 322642 - pdf pages 16-17 of the OIG FLIR SUR](#)] and is/was using end-of-life, unpatched cameras for SPD's internal CCTV system [see [Clerk File 322692 - pdf pages 13-14 of the OIG Video Recording Systems SUR](#)].
- (b) Item 4.7 says, "Access to the systems/technology is limited to authorized personnel via password-protected login credentials." It would be better if access wasn't just password-based, but was also using MFA/2FA (or even 2SA would be something).
- (c) SPD has also not detailed whether a person must be on the SPD network in order to access both the centralized CCTV system and each of the cameras themselves.
- (d) SPD hasn't confirmed whether the CCTV system will have granular access control, such as only supervisors/administrators being able to change the default pan, tilt, and/or zoom of the cameras (aka the preset 'return to home' configuration).
- (e) Nor whether the CCTV system logs the username and timestamp when a camera's pan, tilt, or zoom are changed. For example, if the system does NOT log this and there was a news report about misuse of the CCTV system, then it might be impossible for the OIG/OPA to determine which employee was at fault.
- (f) Item 5.4 in the SIR says that, "Unit supervisors are responsible for ensuring compliance with data retention requirements within SPD"; but that doesn't make sense here. Wouldn't this mean that the unit supervisor for the homicide detectives and the supervisor for the gang unit (and so and so forth) would all each be responsible for ensuring data retention compliance of the CCTV system? That responsibility should be more centralized so as to ensure consistency in application of compliance requirements for a potentially widely-used system like the CCTV.

Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, require the CCTV system to support: detailed logging, Multi-Factor Authentication (MFA), granular access control of the

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

From: Roxy Robles

Sent: Tuesday, June 24, 2025 1:10 PM

To: LEG\_CouncilMembers <[council@seattle.gov](mailto:council@seattle.gov)>; Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: NO TO EXPANDED SURVEILLANCE

Good afternoon,

I am writing as a resident concerned about increased surveillance in our city. These technologies were 'piloted' despite a huge amount of community dissent and after only three weeks of use. Three weeks is not nearly enough to pilot test a new technology and to gather information about its efficacy.

Not only does this raise concerns about the overuse and surveillance of already over-policed communities, this raises concerns about the council's ability to follow its own principle of 'good governance', with a consistent application of ethics, race and social justice principles, and data-driven results. I stand firmly against the additional use of surveillance technologies in our city a SPD is already unreliable, selectively responsive, and unbelievably brutal and racist.

SPD is constantly escalating situations, particularly with regard to people exercising their first amendment right to peaceful protest, and despite Shon Barnes' lip service to 'crime prevention' I have yet to see any marked change under his leadership. *We cannot continue to fund untested technologies for a brutal, racist, and unreliable police force!!!*

Roxy Robles [they/she](#)

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From: Brooke Christiansen

Sent: Monday, June 23, 2025 8:45 PM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material Update Public Comment

Hello, I'm a constituent out of Cap Hill (zip code 98122) and my comment is a follow:

Instead of investing in surveillance tech, let's invest in solving the root causes of crime in this city: high rent (unregulated landlords); limited access to shelter, mental health support, addiction support, job support for (formerly) unhoused folks, etc.; our tax money going to policing and sweeps that may make our neighborhoods temporarily look cleaner but don't solve people's problems; etc.

Best,

Brooke

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From: R. John Setzer

Sent: Friday, June 20, 2025 12:00 PM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material update public comment

With all due respect,

We don't need more surveillance in Seattle. This isn't a police state, and SPD cannot be trusted with that power.

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Sent: Sunday, June 22, 2025 9:19 AM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material Update public comment

Hello,

I am a constituent and a resident of north Seattle who thoroughly opposes expanding of citywide CCTV footage pilot program in the RTCC. More surveillance will NOT keep us safe. We need real programs and

funding for local community advocacy groups and schools instead of cameras to watch our comings and goings. Prioritize proaction instead of reaction!

N.Emery

She/her

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From: Jared Howe

Sent: Sunday, June 22, 2025 12:54 PM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material Update public comment

Dear Seattle City Council,

I'm writing to express my strong opposition to the proposed expansion of CCTV surveillance in Seattle. This plan has moved forward without adequate public notification or transparency from City leadership, SPD, or local media—and the community deserves to be heard.

Research consistently shows that CCTV does not reduce violent crime or improve clearance rates. The SPD's own cited study—a 40-year meta-analysis—found *no significant impact on violent crime*.

Additional studies from the UK, Dallas, and elsewhere echo these findings, emphasizing the cost-ineffectiveness and lack of investigatory value.

Beyond its ineffectiveness, CCTV undermines civil liberties, particularly for marginalized communities. Surveillance has a documented history of abuse—from targeting protests and abortion seekers to racial profiling and stalking. Expanding camera networks only increases the risk of misuse, especially as they tie into facial recognition and other AI-driven surveillance tools.

Seattle already has community-centered initiatives that work. Programs like the Regional Peacekeepers Collective and the Rainier Beach Restorative Resolutions project have reduced violence significantly—and offer far better ROI than surveillance tech.

I urge you to oppose the expansion of CCTV and instead invest in evidence-based, community-led safety solutions. Our city's future depends on trust, transparency, and truly equitable public safety.

Sincerely,

Jared Howe

Seattle, WA

District 2

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From: Noel Rivard <[nrivard67@gmail.com](mailto:nrivard67@gmail.com)>

Sent: Sunday, June 22, 2025 10:44 AM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: No to RTCC and CCTV!!!!

Cameras don't deter people or stop harm from happening, they are just for punishment. Call it what it is or get it out of my neighborhood.

The city's consideration of an off-premise real-time crime center software database is terrifying to me. Especially with the hell our federal administration is putting us through! Our state laws protect us to some degree, but the moving of our data to a third party removes those protections and threatens horrors unseen. PLEASE be diligent and push back in this.

Stop installing the tools for them to surveil and punish!! Get more creative. Do better for our city. Punishment doesn't stop harm from occurring. Get to the root problem. What other pathways could actually prevent this behavior?

I urge you to reconsider for our sake and yours because you live here too. The people their illegally detaining and deporting right now are also your neighbors. History proves, that what we allow to happen

to them, will eventually happen to us.  
Noel Rivard (they/them)

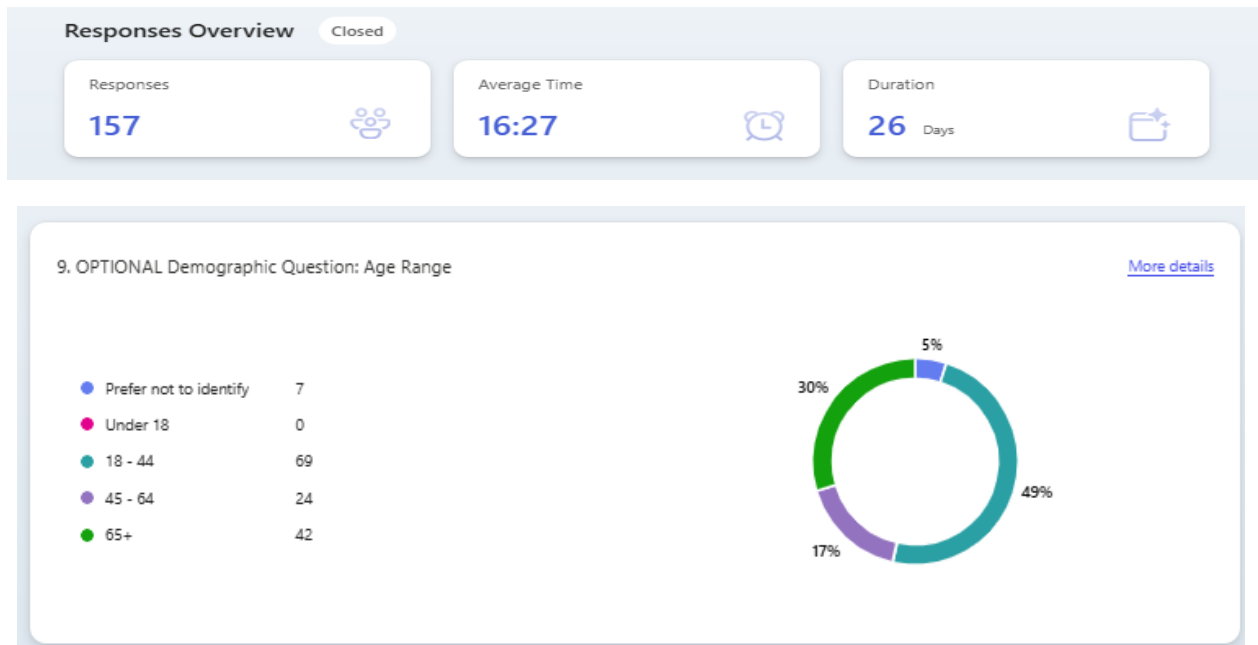
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From: Siobhan Hopp  
Sent: Friday, June 20, 2025 8:45 AM  
To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>  
Subject: SIR material updates public comment  
NO expansion of surveillance! DO NOT give more data to SPD. SPD is violent, racially profiles, protects capital over people, and aids and abets ICE in kidnapping members of my community. They should be being given LESS power and LESS access, not more. I say NO to SDOT giving SPD access to more cameras!

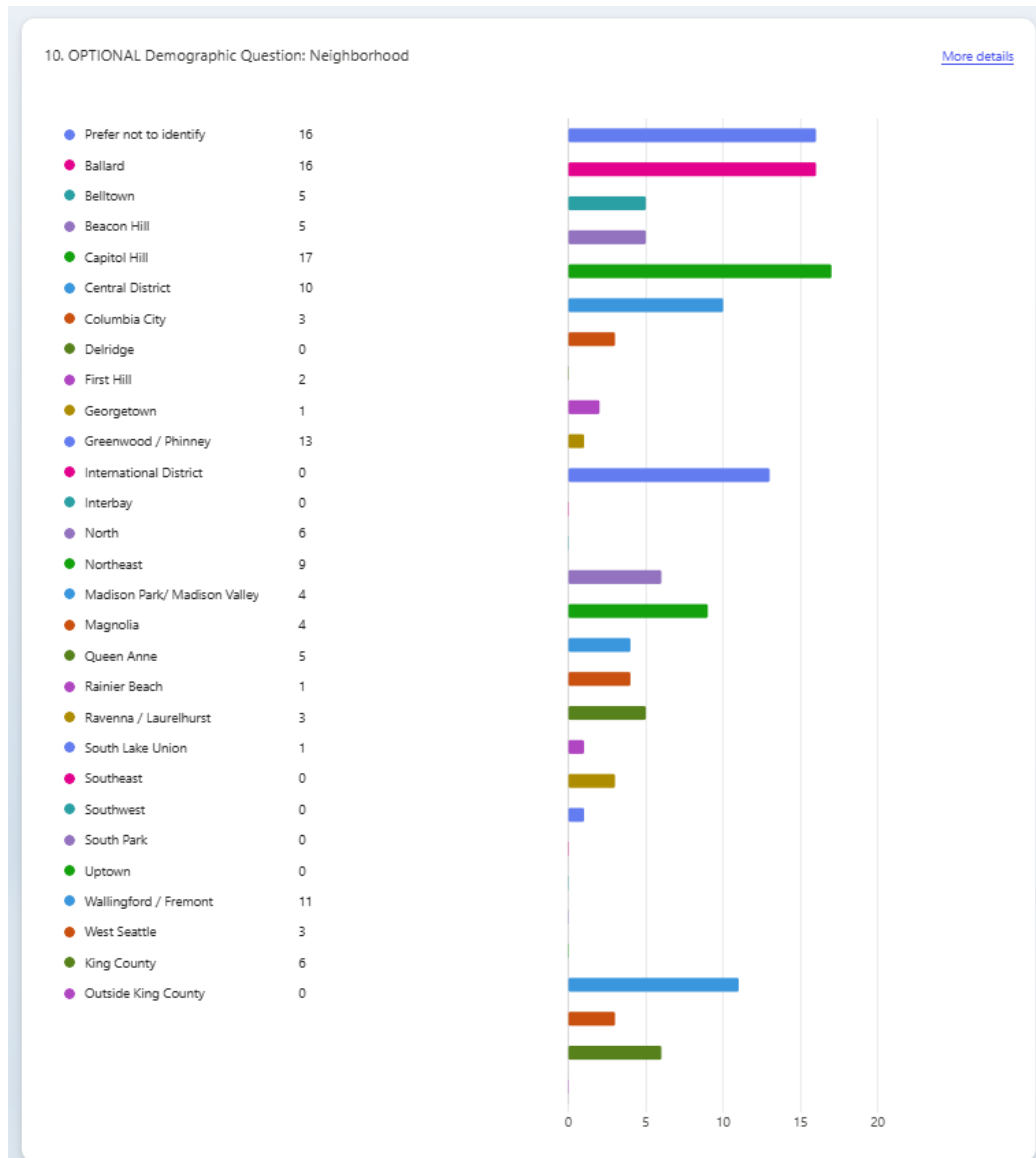
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From: Joelle Pretty  
Sent: Wednesday, June 18, 2025 6:35 PM  
To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>; LEG\_CouncilMembers <[council@seattle.gov](mailto:council@seattle.gov)>  
Subject: SIR Material Update public comment  
CCTV will NOT reduce violent crime or aid in police investigations  
CCTV poses a threat to civil liberties  
Police control CCTV camera, the cameras see what the police want them to see  
RTCC is a threat to women, immigrants, those utilizing their first amendment rights to free speech. It also creates a system ripe for abuse and potential to violate ALL residents' First and Fourth Amendment Rights  
I am opposed to these systems, to the Mayor and City Council expanding surveillance, and any officials in Seattle, King County, and Washington State (frankly, in the country) to cooperating with ICE.  
KNOCK IT OFF  
Sincerely,  
Joelle Pretty, Seattle

**Responses received via form:**



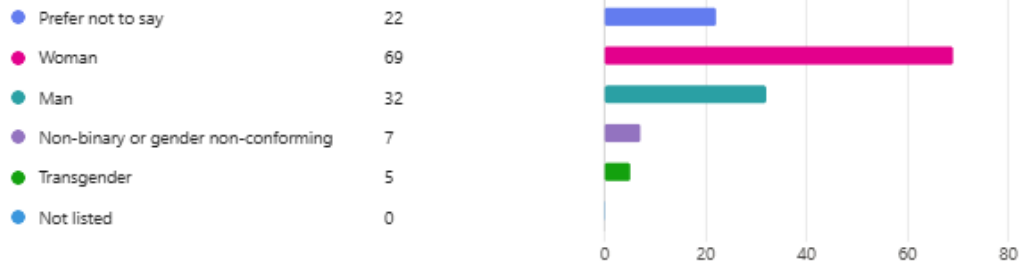
## Appendix B: Public Comment Period (6/03/25 to 6/23/25)



## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

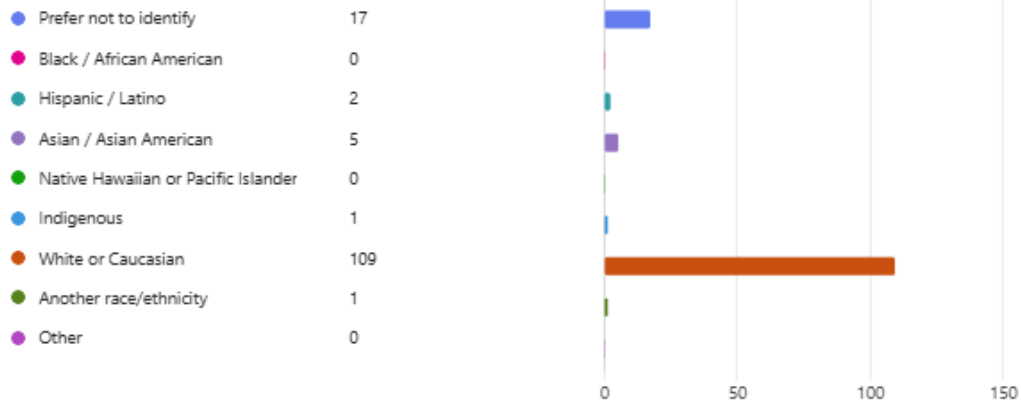
### 11. OPTIONAL Demographic Question: Gender

[More details](#)



### 12. OPTIONAL Demographic Question: Which race (s) / ethnicity (or ethnicities) do you identify as

[More details](#)



Id

What concerns, if any, do you have about the use of this technology?

Do you have any additional concerns about the use of technology (in case you ran out of space)

What value, if any, do you see in the use of this technology?

Do you have additional comments/questions re what value do you see in this technology?

What would you want City leadership to consider when making a decision about the use of this technology?

Do you have additional comments/considerations that leadership should take into account when making a decision about this technology?

Do you have any additional comments or questions?

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

| e in<br>secti<br>on<br>one) |                                                                                                                                                                                                                                                                                                                                                                          |      |                                                                                    |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------------------------------------------------------------------------------------|
| 1                           | I oppose to use if this technology as it increases harmful surveillance and magnifies negative impacts to the LGBT+, BIPOC and immigrant communities of our city                                                                                                                                                                                                         | None | Do not expand the use of this technology                                           |
| 2                           | This is surveillance technology that can and will be used to target marginalized groups. Seattle is currently facing an epidemic of police-ICE collusion and abductions by ICE that violate constitutional rights. If you care about stopping criminals, the biggest criminals in our community are ICE and SPD. Surveillance technology will only further their crimes. |      | Consider how surveillance is used to perpetrate crimes by police against citizens. |
| 3                           | CCTV does not reduce violent crime and is a threat to our civil liberties                                                                                                                                                                                                                                                                                                | None | Invest in actions that actually reduce violence, rather than surveilling people    |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | <p>This is excessive surveillance. We could be using these funds in so many other ways. We know that excessive surveillance tends to disproportionately impact homeless people, Black people, immigrants, and other communities who already have enough to deal with.</p> | None                                                                                                                             | <p>I urge City leadership to use an equity lens when making this decision. Who are the communities most impacted? How are their human rights being violated, whether intentionally or unintentionally? What could we be doing with these funds instead, that wouldn't involve surveilling people?</p> |
| 5 | <p>This technology is not proven to provide any measureable differences on crime outcomes. It is rife with potential abuse and misuse. We have a right to a degree of privacy in public spaces.</p>                                                                       | No value what so ever.                                                                                                           | <p>Consider the impact that this has on our populace especially the most vulnerable among us. This doesn't help them. We should be using the limited money we have on proven effective methods of addressing crime.</p>                                                                               |
| 6 | <p>Lack of safeguards for the data, conducting this surveillance is an invasion of privacy, and it will likely be used to target already marginalized communities. This technology will not make us any safer.</p>                                                        | None.                                                                                                                            |                                                                                                                                                                                                                                                                                                       |
| 7 | <p>Loss of public privacy and the technology being used for nefarious means by the government.</p>                                                                                                                                                                        | <p>None. Stores already have their own cameras, why do we need them all over the public? They are not used to make us safer,</p> | <p>YES.</p>                                                                                                                                                                                                                                                                                           |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--|-----------------------------------------------------------|
|   | <p>CCTV will NOT reduce violent crime or aid in police investigations.</p>                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
| 8 | <p>The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”</p>                                                                                                                                                                                                 |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
|   | <p>A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer.</p>                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
|   | <p>A study of Dallas, TX found “[CCTV] cameras are likely not cost-effective in terms of increasing clearances” due to any increases in clearance rates being mostly limited to thefts.</p>                                                                                                                                                                                                                                                                 | <p>I worry about expanding this now that we see the rise of authoritarianism in our country. It could be “used for good” (I don’t really believe that) but it can also absolutely be used for evil depending who controls it. I don’t trust it.</p> |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
|   | <p>Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved.</p>                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                     | No. | <p>You have allowed ICE access to this footage. Shame on you.</p> | <p>We’re watching. We’re watching our country devolve into authoritarianism. You can choose to take actions to help it or not.</p> | <p>SPD has been cooperating with ICE. Are we not a sanctuary city anymore?</p> |  | <p>I want to know why you put SPD over your citizens?</p> |
|   | <p>No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates.</p>                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
|   | <p>Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV. Justice Department experiments have found “[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels. Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors.”</p> |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
|   | <p>CCTV poses a threat to civil liberties</p>                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
|   | <p>SPD officer abused surveillance to stalk a “hot” SPD employee</p>                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |
|   | <p>The University of Hull Department of Social Policy</p>                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                     |     |                                                                   |                                                                                                                                    |                                                                                |  |                                                           |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...”

The University of Hull study also found “The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for ‘no obvious reason’ and on the basis of categorical suspicion alone.”

In Washington, DC a police lieutenant was caught using police surveillance technology to blackmail gay men.

CCTV camera operators have been caught using the cameras to spy on people.

CCTV cameras open the door to expanding Automated License Plate Readers (ALPRs), facial recognition, and a host of algorithms that “examine” how people are walking to determine if they’re suspicious.

People’s brains act in a manner similar to “psychosis and social anxiety disorder” when they know they are being surveilled.

Police control CCTV camera, the cameras see what the police want them to see

Cameras have been caught panning away from police violence to avoid creating evidence of the police’s actions.

Police departments have been caught manipulating and “losing” CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and “losing” footage related to the police killing of Freddie Gray.

There are MANY effective tools the city could use to decrease community violence

Violence interruption programs work.  
Neighborhoods that have

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. These programs save money, research has shown every \$1 invested saves \$33.

Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and ha

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| 9  | This technology will be used unfairly to bias against marginalized communities. There won't be awareness that people are being surveilled by the police.                                                                                               |                                                                                                                                         | None                                                                                                    |                                                                              | Consider telling people that you're planning to do this. Don't pretend to pilot the technology then ask for full access to the CCTV cameras immediately after the pilot starts.                                                                                                                         |                                                                                                                   |
| 10 | There's no way to train out bias in a consistent way. Nor in a way that gets rid of it 100% within in organization. This technology will be used to by the people who are biased and hateful to persecute those they feel are lesser. Mark. My. Words. | Just read it again.                                                                                                                     | None, for me basically. There is only value for the people who want to see others they hate persecuted. | Panopticon .                                                                 | A right to privacy can extend to spaces where we want to feel alone. When there is a literal surveillance of everyone in the city, there is nowhere that one can feel at peace. The city is already isolating in a backwards way. Why can't we be able to choose when we are alone and when we are not? | nope<br><br>Would be best if we just had cameras in everyone's homes running all the time?                        |
| 11 | I don't want to live in constant surveillance when our current president is using it to arrest people who disagree with him or even when we have a decent president, hope that clears things up for you                                                | You're ushering in a police state with all this surveillance while the president is arresting people who disagree with him? Please stop | zero                                                                                                    | yeah, spend the money on social safety nets instead of cops and surveillance | instead of ushering in a police state, fix the homeless problem and tax the rich                                                                                                                                                                                                                        | Yeah, y'all need to tax the rich and support affordable housing before you put in cameras to watch out every move |
| 12 | The cameras will obviously be used to create a panopticon to rope in LGBTQIA+, minorities, and other groups the Trump administration doesn't like. They should not exist.                                                                              |                                                                                                                                         | None. It only benefits fascists and autocrats looking to destroy our rights.                            |                                                                              | The First and Fourth Amendments.                                                                                                                                                                                                                                                                        | You have a chance to be on the right side of history, or just be more oppressors.                                 |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>I'm concerned that increased surveillance will lead to increased policing, particularly of vulnerable communities, and particularly reinforcing the school-to-prison pipeline in the case of cameras at schools. I'm also particularly concerned about police using this technology to further harass peaceful protestors given the current political climate, SPD's relationship to the current president (which can be inferred by 6 members of SPD participating in the January 6 attempted coup) and the long history of abuses by SPD against Seattle residents, queer residents especially (see: recent arrest of a trans person at Denny Blaine for simply enjoying the space like everyone else). Seattle's budget is already wildly bloated by spending money on our police force, this will only further that bloat. I wish we could dedicate these funds to something actually meaningful to residents like improving infrastructure and increasing affordable housing. I also worry that the data gathered by these cameras will end up sold to and/or held by private corporations, further invading our privacy as private individuals.</p> | <p>None, more cops have not made Seattle safer, just more policed.</p> | <p>Do Seattle residents need a panopticon to keep us safe? Has increasing police resources and invading communities ever increased safety? Who would be able to access the data gathered? Have SPD proven themselves to be responsible enough to manage this data? Do SPD have a vested interest in drumming up fears around crime? Should we exacerbate historic abuse perpetuated by police against POC and queer residents and high school students by increasing surveillance and by extension police presence? Would you put these in your neighborhood, or any of the public spaces you frequent? What groups are most likely to have their behaviors interpreted as criminal when existing in public spaces?</p> |
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Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1<br>4 | <p>This kind of surveillance instills a sense of fear into the communities it is installed in. Also the increase in policing that will invariably follow these installations will disproportionately affect homeless populations, people of color, and queer people. We don't need more surveillance and policing. We need resources and community support.</p> | <p>None</p> | <p>Police cannot be used as a blanket "solution" to community safety and security. They actively make our communities less safe, especially when police forces (as they often do) contain white supremacists and virulently queerphobic people. I guarantee you that police will use these cameras as pretense to raid queer spaces and lead to even more fear and suffering on behalf of a queer community that is already under attack. But maybe that's what the city wants to see anyway considering the all but warm welcome city government has given to anti-trans bigots in cap hill and at city hall recently. Please don't make Seattle another place queer and trans people have to fear when it is one of the few safe-enough places we have left. Our communities need housing, healthcare, nutritious food, safe and accessible drinking water (I have friends who haven't had working water in their homes for months), walkability, and accessible transit. We need community care and safety measures, not policing.</p> |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1<br>5 | I am concerned that this technology infringes upon citizens' rights to privacy as well as targets and endangers marginalized groups including the queer community, people of color, and immigrants.                                                                                                                                                                                                                                                                                     |       | Consider how implementing this technology will change the way people act under perceived surveillance and the way law enforcement will engage with your constituents. |
| 1<br>6 | Increased surveillance technology will inevitably be used disproportionately against marginalized communities to criminalize and police their lives. This technology is ineffective, unnecessary and only creates an anti-social environment for our city.                                                                                                                                                                                                                              | None  | Who does it benefit? Who does it serve? Who is asking for this? How will it realistically be used? Who will be harmed?                                                |
| 1<br>7 | Racial profiling, surveillance state, increasingly untrustworthy federal government (which SPD sometimes cooperates with). SPD should have to earn the trust of the people, and they have not done so.                                                                                                                                                                                                                                                                                  | None  |                                                                                                                                                                       |
| 1<br>8 | These technologies invade people's privacy and do nothing to prevent crime from happening. Instead of expanding surveillance, we should be investing in violence prevention and restorative justice efforts. There is also a significant concern that by continuing to expand CCTV access, we set up opportunity for folks coming to Washington to access medical care (abortions and gender affirming care) from other states to be monitored and punished by their state governments. | None. |                                                                                                                                                                       |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

CCTV cameras do not decrease violence or meaningfully increase clearance rates. This has been studies & proven repeatedly:

A 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”  
[https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1275&context=jj\\_pubs](https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1275&context=jj_pubs)

British Home Office study found CCTV did not reduce crime or make people feel safer  
<http://news.bbc.co.uk/1/hi/england/leicestershire/4294693.stm>

A Dallas, TX study showing the only increases in clearance rates are for thefts.  
<https://link.springer.com/article/10.1007/s11292-021-09477-8>

CCTV cameras pose a massive risk for everyone.

ICE has access CCTV footage from across the country including Washington State & supposed “sanctuary” states.  
<https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>

Law enforcement in states with abortion bans have been able to search CCTV footage from abortion sanctuary states to look for people that have had abortions.  
<https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion/>

No law, contract, agreement, or court decision can stop ICE from accessing CCTV footage because the current federal administration does not care about or follow the law or court decisions.

Absolutely none. This technology is an abuse of power with a universal adapter and should be removed from Seattle.

The issues on CCTV are very well documented and all came up last year when the Seattle community, Office of Civil Rights, and Community Surveillance Working Group all recommended against CCTV. Why is the city considering expanding this technology now when it is being used by ICE to disappear people and its abuses are so documented?

Why is SPD moving to expand CCTV and change it from a “pilot” to a “program” less than 3 weeks after the supposed “pilot” went live across the city on May 20th?

Where is the money for this camera expansion coming from? Relatedly, how is there money for this while the city is doing austerity and cutting services?

If the city cares about protecting the people of Seattle, it should be removing CCTV.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

That's even before  
considering all of the cases of  
individual officers abusing  
CCTV to spy on and blackmail  
people.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|--------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|------|------------------------------------------------------------------------------------------|
| 2<br>0 | It turns the city into a surveillance state and has much potential for abuse. | Studies have shown that it doesn't reduce violent crime, so ultimately what is the point. | None | Vulnerable communities that will fall victim due to abuse and misuse of this technology. |
|--------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|------|------------------------------------------------------------------------------------------|

|        |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |                                                         |                                                                                                                                                                                                                                                                                        |
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| 2<br>1 | I am concerned about the study that SPD cited to expand these cameras that showed these cameras do not affect violent crime rates and clearance rates, which are the two things most concerning in terms of public safety. I am concerned that SPD has collaborated with ICE and will share this information to target immigrants. I am concerned that police officer in Texas used WA CCTV camera footage to monitor people going to abortion clinics. |  | Do you have evidence that the CCTV you have is working? | How are you measuring the effectiveness of this technology? What is success and what is failure, and can you articulate a measurable standard? If it doesn't meet that standard, would you have the courage to roll it back? Can you roll it back, or do the police not answer to you? |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>2<br/>2</p> <p>CCTV surveillance raises serious concerns about civil liberties, racial justice, and community well-being. These cameras disproportionately target BIPOC and low-income neighborhoods, reinforcing systemic racism and a presumption of guilt. The presence of surveillance creates a climate of fear and control, not safety, and erodes trust in public institutions. The Seattle Police Department has a documented history of misusing surveillance tools—including spying on activists and leaking personal data—making it clear that abuse is not a hypothetical risk. This technology also poses a direct threat to our city’s sanctuary policies and to people seeking abortion or gender-affirming care, especially when data is stored in the cloud or shared with other agencies.</p> | <p>I see little to no value in expanding CCTV use. Multiple studies, including a 40-year meta-analysis, show that CCTV does not reduce violent crime and has only limited impact on petty theft in places like parking lots. If anything, it creates a false sense of security while failing to address root causes of violence. Given its high costs and minimal effectiveness, it is not a justifiable public safety investment.</p> | <p>City leadership must consider the real harm this surveillance causes—especially to communities already over-policed—and weigh that against the lack of evidence that CCTV improves public safety. Investing millions into expanding this system is not only wasteful, it actively undermines trust and diverts resources from strategies that actually work, like community-led violence prevention, affordable housing, youth programs, and mental health support. Leadership must also recognize the risk of long-term misuse, data sharing, and mission creep, particularly when footage is managed through private or cloud-based systems with minimal oversight.</p> | <p>Before approving any expansion, the City should conduct independent impact assessments, publish clear policies on data use and retention, and engage meaningfully with communities most affected by surveillance. This is not just a technology issue—it’s a human rights issue. Seattle has the opportunity to choose community safety over surveillance and should reject this proposal.</p> |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>I am deeply concerned about the use of CCTV in our city. CCTV does not increase our safety as a community, it collects data about our movements as individuals, imposes psychological limitations on our freedom, creating a big brother dynamic with the city and state. More concerning is that there is plenty of historical and present day evidence that surveillance systems like this are used to trample civil liberties including that data being shared with ICE, against citizens who are invoking their free speech rights to protest, women and people seeking abortion care (the list goes on).</p> | None                                 | <p>If you want to create safe communities, invest in people not surveillance technology. Studies show that the following work: violence interruption programs, increased public transit, restoring vacant land, green spaces, community hubs like public libraries, mental health and substance abuse treatment centers, income support to reduce and eliminate poverty, etc. No one said any of the above is easy or immediate, but the longer term ramifications is supremely better than trampling on people's civil liberties.</p> | <p>I will not vote for anyone that is a part of expanding the city's CCTV network.</p> |
| <p>This will be used to surveil the same people being targeted by the trump administration - racialized people, poor people, youths, queer and trans people!</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Stop expanding surveillance !</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                        |

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| <p>- CCTV poses a threat to civil liberties. See item 2 in this document for specific examples:<br/> <a href="https://stopsurveillancecity.wordpress.com/closed-circuit-television-cameras-cctv/">https://stopsurveillancecity.wordpress.com/closed-circuit-television-cameras-cctv/</a><br/> - Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions<br/> (https://www.bloomberg.com/news/articles/2011-12-27/when-police-abuse-surveillance-cameras).<br/> - Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray<br/> (https://www.thedailybeast.com/how-baltimore-cops-doctored-footage-of-freddie-grays-arrest).</p> | <p>None that would outweigh its harms.</p> | <p>Studies have shown that CCTV does not reduce violent crime or aid in police investigations. Meanwhile, investing in community-led solutions and restorative justice practices (over punitive/carceral/police-and-prisons practices) have been SHOWN to be effective in increasing public safety and lowering crime. I want City leadership to invest in solutions that have been proven to be effective, not CCTV which has been proven NOT to be effective.</p> <p>See this document (<a href="https://stopsurveillancecity.wordpress.com/closed-circuit-television-cameras-cctv/">https://stopsurveillancecity.wordpress.com/closed-circuit-television-cameras-cctv/</a>) for many specific examples and studies reaffirming the ineffectiveness of CCTV.</p> <p>See item 4 in the same document for specific examples of the many effective tools the city should use instead that are actually shown to decrease violence.</p> |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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CCTV surveillance raises serious concerns about civil liberties, racial justice, and community well-being. These cameras disproportionately target BIPOC and low-income neighborhoods, reinforcing systemic racism and a presumption of guilt. The presence of surveillance creates a climate of fear and control, not safety, and erodes trust in public institutions. The Seattle Police Department has a documented history of misusing surveillance tools—including spying on activists and leaking personal data—making it clear that abuse is not a hypothetical risk. This technology also poses a direct threat to our city's sanctuary policies and to people seeking abortion or gender-affirming care, especially when data is stored in the cloud or shared with other agencies.

I see little to no value in expanding CCTV use. Multiple studies, including a 40-year meta-analysis, show that CCTV does not reduce violent crime and has only limited impact on petty theft in places like parking lots. If anything, it creates a false sense of security while failing to address root causes of violence. Given its high costs and minimal effectiveness, it is not a justifiable public safety investment.

City leadership must consider the real harm this surveillance causes—especially to communities already over-policed—and weigh that against the lack of evidence that CCTV improves public safety. Investing millions into expanding this system is not only wasteful, it actively undermines trust and diverts resources from strategies that actually work, like community-led violence prevention, affordable housing, youth programs, and mental health support. Leadership must also recognize the risk of long-term misuse, data sharing, and mission creep, particularly when footage is managed through private or cloud-based systems with minimal oversight.

Before approving any expansion, the City should conduct independent impact assessments, publish clear policies on data use and retention, and engage meaningfully with communities most affected by surveillance. This is not just a technology issue—it's a human rights issue. Seattle has the opportunity to choose community safety over surveillance and should reject this proposal.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

I've read that SPD plans to expand and make permanent their use of CCTV cameras throughout the city. From what I've read, CCTV doesn't make us safer. Instead, it's a threat to civil liberties...especially when (as happened in Oregon) the local police department shares footage with ICE.

I want my city to use viable, proven solutions like violence interruption programs, mental health services, and investments in libraries and green spaces, etc., to make our city safer and better. Not surveillance.

Surveillance technologies, like humans, have racial bias. I am very concerned that greater surveillance of our communities will lead to police disproportionately targeting Black and Brown people.

I'm a Garfield high school and Washington Middle school alum and the recent shootings there are devastating. But I know greater police presence and surveillance do not stop gun violence. Community programs that give youth resources and opportunities, social services that allow families to get stable work, housing, food, transportation, are what make our communities safer.

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| 2<br>9 | I have concerns that this will be used to profile and target the most marginalized in our community                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | None | That SPD is consistently violent and have been under federal oversight for many years due to their actions- they don't need more tools to bully, harass, and assault people       |
| 3<br>0 | There is no evidence that installing CCTV is going to effectively stop crimes. It will make the public feel watched and uncomfortable, especially those who are often subject to profiling by police departments. We do not need a surveillance state, especially one that local police who are in contention with public opinion have control over. Especially in minority and queer places. It also sets up a precedent for further authoritarian pressure and control on daily lives of citizens. It is in opposition of freedom. It is security by aggression. While people should feel safe, they should also feel free. Safety should not have to come at cost. | None | How much authority over the lives of citizens they should exact. Does the state have the authority to be constantly monitoring its citizens. Is this security or is this control? |

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| 3<br>1 | CCTV surveillance raises serious concerns about civil liberties, racial justice, and community well-being. These cameras disproportionately target BIPOC and low-income neighborhoods, reinforcing systemic racism and a presumption of guilt. The presence of surveillance creates a climate of fear and control, not safety, and erodes trust in public institutions. The Seattle Police Department has a documented history of misusing surveillance tools—including spying on activists and leaking personal data—making it clear that abuse is not a hypothetical risk. This technology also poses a direct threat to our city's sanctuary policies and to people seeking abortion or gender-affirming care, especially when data is stored in the cloud or shared with other agencies. |     | I see little to no value in expanding CCTV use. Multiple studies, including a 40-year meta-analysis, show that CCTV does not reduce violent crime and has only limited impact on petty theft in places like parking lots. If anything, it creates a false sense of security while failing to address root causes of violence. Given its high costs and minimal effectiveness, it is not a justifiable public safety investment. |     | City leadership must consider the real harm this surveillance causes—especially to communities already over-policed—and weigh that against the lack of evidence that CCTV improves public safety. Investing millions into expanding this system is not only wasteful, it actively undermines trust and diverts resources from strategies that actually work, like community-led violence prevention, affordable housing, youth programs, and mental health support. Leadership must also recognize the risk of long-term misuse, data sharing, and mission creep, particularly when footage is managed through private or cloud-based systems with minimal oversight. |     | Before approving any expansion, the City should conduct independent impact assessments, publish clear policies on data use and retention, and engage meaningfully with communities most affected by surveillance. This is not just a technology issue—it's a human rights issue. Seattle has the opportunity to choose community safety over surveillance and should reject this proposal. |
| 3<br>2 | The violation of every person's right to privacy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N/A | None, complete waste.                                                                                                                                                                                                                                                                                                                                                                                                           | N/A | Privacy is a right.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N/A | N/A                                                                                                                                                                                                                                                                                                                                                                                        |

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|--------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|----------------------------------------------------------|
| 3<br>3 | Increasing repression of the people by the police. Surveillance does not keep us safe, resources and social services do. | Technology will not save us. The police state will not save us. Give/provide people resources, not repression. | It'll get hacked and used against ICE | Resources over policing. Crime is a result of lack of resources, not police. We keep giving more and more money to them, with less and less results. POLICE ARE NOT THE SOLUTION. | The people DO NOT want a surveillance state. | Here is YOUR chance to stand up against authoritarianism |
| 3<br>4 | This is a waste of city money and an unnecessary intrusion on citizens.                                                  |                                                                                                                | None.                                 | Consider your legacy. Authoritarianism or helping residents                                                                                                                       |                                              |                                                          |

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This technology will make the city of Seattle a dangerous, more unwelcoming surveillance state. People will be harmed by this technology. People will risk losing their lives because this technology will be abused by the ICE patrol that already kidnaps our community members and tears families apart. I am certain this CCTV will never help us, we have seen the harms it has done in destroying our community and our access to our streets, parks, public spaces in other places that it has been implemented in like London in the UK. CCTV is harmful and will be dangerous for everyone in Seattle. CCTV is susceptible to abuse and has never prevented violence or helped with crime rates. Putting cameras in shared spaces will further the discriminatory targeting that has been studied in the disproportionate surveillance of people of the global majority or Black people, Indigenous people and other people of color. The camera systems have susceptibility to be abused to stalk people and have led to abusive behaviors from operating the cameras to stalk people in their private spaces and homes. These technologies could be harmful in wrongful facial recognition and falsely accusing people by profiling people based on inaccurate technology information. There are no current enforceable legal limitations to privacy, invasions and protections against abuse of CCTV systems, which means that enforcing these before having protections beyond the fourth amendment in the US Constitution will be dangerous and Lack accountability and protections against abuse or violations. This technology act will enforced manufactured consent as not all people who will be in the public spaces will have voted on this or agreed to be filmed, which goes against their rights to not be filmed

There would be no value of this technology.

Please do not put this surveillance system in place. CCTV has extreme and dangerous, harms and potential risks to the communities that it surveils. This would be too costly and too risky to do.

I want you to understand the limitations and the high cost and false sense of security and risks to hacking and lack of effectiveness against crime that this technology has. It will further harm the community and promote a surveillance state that disconnects community and forces distrust from the City onto its people as well as between people and their community and fellow community members. CCTV has been abused and led to horrific incidences of stocking and discrimination of community members in cities that it has been in place.

Please refer to what I previously stated: This technology will make the city of Seattle a dangerous, more unwelcoming surveillance state. People will be harmed by this technology. People will risk losing their lives because this technology will be abused by the ICE patrol that already kidnaps our community members and tears families apart. I am certain this CCTV will never help us, we have seen the harms it has done in destroying our community and our access to our streets, parks, public spaces in other places that it has been implemented in like London in the UK. CCTV is harmful and will be dangerous for everyone in Seattle. CCTV is susceptible to abuse and has never prevented violence or helped with crime rates. Putting cameras in shared spaces will further the discriminatory targeting that has been studied in the disproportionate surveillance of people of the global majority or Black people, Indigenous people and other people of color. The camera systems have susceptibility to be abused to stalk people and have led to abusive behaviors from operating the cameras to stalk people in their private spaces and homes. These

Do not enforce this technology.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

or surveilled in Seattle. I am worried that there is a lack of proportion between benefits and risks that this Act will have as it is intrusive and in violation of our rights, especially having severe mental and psychological and emotional effects on people, as well as the physical dangers that this technology poses to surveillance tactics of people. This technology will also take away from funds that would better go towards the well-being of the community of Seattle and benefit the structural protections of people, here and communities, families, schools, hospitals, public healthcare And other spaces that need more funding. This technology will be costly and dangerous. There needs to be better transparency about how such technologies would ever be used. There is no plan on how to prevent abuse Of the technology, which will leave loopholes for further harm. The widespread concerns about the potential harms of the constant monitoring of streets and public spaces in Seattle and beyond this technology is valid as it could be abused by those who hack or access the footage and use it harmfully. This technology includes many concerns about privacy and civil liberties. Ongoing maintenance and the initial financial cost of setting up. This technology will be harmful to the financial plans and budgeting of the city and SPD. This technology could lead to an overreliance on video footage from the CCTV and will lead to extra losses to the false notion that it will help with prevention of crime yet it can only record crime. The Technology would never stop crime or violence from happening. I'm concerned about the compliance to regulations on this technology as there need to be more regulations in place with how this would be set up and evolving as technology changes and

technologies could be harmful in wrongful facial recognition and falsely accusing people by profiling people based on inaccurate technology information. There are no current enforceable legal limitations to privacy, invasions and protections against abuse of CCTV systems, which means that enforcing these before having protections beyond the fourth amendment in the US Constitution will be dangerous and Lack accountability and protections against abuse or violations. This technology act will enforced manufactured consent as not all people who will be in the public spaces will have voted on this or agreed to be filmed, which goes against their rights to not be filmed or surveilled in Seattle. I am worried that there is a lack of proportion between benefits and risks that this Act will have as it is intrusive and in violation of our rights, especially having severe mental and psychological and emotional effects on people, as well as the physical dangers that this technology poses to surveillance tactics of people. This technology will also take away from funds that would better go towards the well-being of

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location regulations differ  
And the effectiveness of the  
cameras would diminish  
overtime, which would be a  
long term costly burden on  
the City of Seattle and SPD.  
As studies have shown in  
cities where CCTV has been  
brought up such as in  
London, the lack of trust in  
the community and  
employees rises with the  
furthering of CCTV presence,  
and could also reinforce  
more criminal activities to  
less surveilled areas.

the community of  
Seattle and benefit  
the structural  
protections of  
people, here and  
communities,  
families, schools,  
hospitals, public  
healthcare And  
other spaces that  
need more funding.  
This technology will  
be costly and  
dangerous. There  
needs to be better  
transparency about  
how such  
technologies would  
ever be used. There  
is no plan on how  
to prevent abuse Of  
the technology,  
which will leave  
loopholes for  
further harm. The  
widespread  
concerns about the  
potential harms of  
the constant  
monitoring of  
streets and public  
spaces in Seattle  
and beyond this  
technology is valid  
as it could be  
abused by those  
who hack or access  
the footage and use  
it harmfully. This  
technology includes  
many concerns  
about privacy and  
civil liberties.  
Ongoing  
maintenance and  
the initial financial  
cost of setting up.  
This technology will  
be harmful to the  
financial plans and  
budgeting of the  
city and SPD. This  
technology could  
lead to an  
overreliance on  
video footage from  
the CCTV and will  
lead to extra losses  
to the false notion  
that it will help with  
prevention of crime  
yet it can only  
record crime. The  
Technology would  
never stop crime or  
violence from

happening. I'm concerned about the compliance to regulations on this technology as there need to be more regulations in place with how this would be set up and evolving as technology changes and location regulations differ. And the effectiveness of the cameras would diminish overtime, which would be a long term costly burden on the City of Seattle and SPD. As studies have shown in cities where CCTV has been brought up such as in London, the lack of trust in the community and employees rises with the furthering of CCTV presence, and could also reinforce more criminal activities to less surve

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3  
6 expensive and ineffective we do not  
need to  
expand  
surveillance none

There is very little evidence to show this stops crime. Even the study that SPD cites states that surveillance of this type had little to no effect on preventing or stopping crime.

3  
7 This surveillance will increase harassment of our communities and honestly, prevent them from thriving. Some of the culturally richest spaces in our city will be devastated by this.

None.  
This is a gross waste of resources that could be directed to actually preventing crime.

If the research doesn't show this is beneficial, why are we spending money on this?

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| <p>The only study SPD cites - a 40 year systematic review with meta-analysis of the efficacy of CCTV - concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop."</p> <p>I am concerned that expansion of CCTV and the risk it poses to vulnerable communities. CCTV will become a part of SPD's growing and expansive network of surveillance that is part of RTCC and accessible to agencies like ICE and Customs and border control - putting our immigrant communities at further risk. SPD has been inconsistent in whether cameras will be monitored 24/7 or only accessed in an investigation - but the data is accessible to SPD as well as any law enforcement agency across the country for warrant-less searches.</p> | <p>CCTV has not been shown to be effective as an investigatory tool.</p> | <p>CCTV has been shown to be effective in decreasing car theft in parking lots. But not of the locations that CCTV is being expanded too fit that definition - so I do not see a benefit to this material update</p> | <p>Evan with a seemingly "neutral" technology - members of LGBTQ+, immigrant, and BIPOC communities are disproportionately surveilled. Given the areas most heavily currently surveilled and the proposed expansion - SPD will certainly ensure this trend continues.</p> | <p>This technology is enormously expensive with little to no public benefit and potential for great public harm.</p> <p>Seattle Community Surveillance Working Group's report on CCTV &amp; RTCC "a majority of the working group is unsupportive of any pilot deployment of these two technologies"</p> <p>Public input into the obtaining of these technologies in the first place was overwhelmingly negative. Much of the public feedback warned that surveillance tools would be used by ICE and CBC to violate sanctuary city laws and that red states would use surveillance tools to track those seeking abortion care or gender-affirming care. Now, reports are coming in that this is in fact happening.</p> <p><a href="https://www.theurbanist.org/2025/06/19/license-plate-readers-proliferate-in-washington-ice-overreach/">https://www.theurbanist.org/2025/06/19/license-plate-readers-proliferate-in-washington-ice-overreach/</a></p> <p>This "material update" of surveillance is putting further weapons in the hands of the Trump administration. We will hold our public officials accountable for these decisions especially as we</p> | <p>Look at the research. a 40 year systematic review with meta-analysis of the efficacy of CCTV - concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop."</p> <p>This is the study SPD cited in the original SIR. If they had bothered to read the study they would see that it does not support SPD's claims.</p> |
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see SPD act as  
"mutual aid" to  
federal agents and  
assist in  
disappearing our  
community  
members.  
Meanwhile Mayor  
Harrell and city  
council fail to  
make the kind of  
material  
investments in  
community that  
actually lead to  
public safety.

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|                | <p>This is dangerous and infringes on our American right to organize. Increased surveillance will just allow for more government overreach into our personal lives, and directly contradicts with small government values.</p>                                                                                    |                  |                                                                                                                                                                                                              |                                                                                                                                           |
| <p>3<br/>9</p> | <p>The SPD has demonstrated bias against transgender people (recently on May 24th in Cal Anderson), and also against others such as homeless people, migrants, and people of color. CCTV will allow police to attack those people and find ways to arrest people for any reason, regardless of justification.</p> | <p>No value.</p> | <p>Think about whether you want to have government organizations outside of Seattle requesting our footage and putting you in danger, or if you want your location to be known by those who despise you.</p> | <p>American values are about protecting our right to organize and allowing all to be free to demonstrate and protest against tyranny.</p> |
| <p>4<br/>0</p> | <p>I am deeply concerned about the proposal to increase surveillance in my neighborhood. The SPD has not proven they will use this power responsibly, and I do not want myself or my neighbors to feel surveilled in our community.</p>                                                                           |                  |                                                                                                                                                                                                              |                                                                                                                                           |
| <p>4<br/>1</p> |                                                                                                                                                                                                                                                                                                                   |                  | <p>CCTV will NOT reduce violent crime or aid in police investigations. CCTV poses a threat to civil liberties. Police control CCTV camera, the cameras see what the police want them to see.</p>             |                                                                                                                                           |

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| <p>4 This surveillance infringes upon civil liberties and community well-being. CCTV cameras target low-income communities and Black, Indigenous and people of color populations, reinforcing negative racial stereotypes.</p> <p>2 SPD's track record with surveillance tools isn't good, thereby increasing risk of misuse. This system also puts our city's sanctuary policies at risk -- and in the current federal climate that puts anyone seeking abortion or gender-affirming care at even higher risk.</p> | <p>Very little. Research has shown that CCTV does not reduce violent crime. It does not address either end of violent crime--the causes or effects.</p> | <p>Please consider both the evidence about the harm CCTV causes and the lack of evidence that it improves public safety. Spending millions on this technology is wasteful. Those funds could be put to better use in community-led violence prevention, affordable housing, mental health and addiction treatment, and youth programs.</p> | <p>The City should conduct independent impact assessments, publish transparent policies on data use and retention, and engage with communities that would be directly affected by the tech.</p> |
| <p>4 The information gained will allow ICE to bypass Sanctuary laws and will target</p> <p>3 immigrants and LGDTQ+ individuals. This is a major element of a police state.</p>                                                                                                                                                                                                                                                                                                                                      | <p>None</p>                                                                                                                                             | <p>I would like them to consider individual privacy laws, and the rights of individuals</p>                                                                                                                                                                                                                                                |                                                                                                                                                                                                 |
| <p>4 It does not solve or prevent violent crime. It breeds distrust and is used disproportionately for marginalized people. There are other better ways to deal with crime...surveillance doesn't deal with the root problems. Please look at other ideas and possibilities before treating the whole city as a crime scene.</p>                                                                                                                                                                                    | <p>None, it's terrifying.</p>                                                                                                                           | <p>Time to trendsetter s, think outside of the box, think about what really makes people feel safe. This does mone of that.</p>                                                                                                                                                                                                            | <p>Get other options</p>                                                                                                                                                                        |

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| 4<br>5 | Surveillance is a powerful tool of social oppression. This will only increase violence. It will only lead to more discrimination and division. Adding more surveillance technology will only increase crime and increase violence towards innocent people       | No. This is not the answer to a safer community                                                                                                    | There is no value to this technology | Consider that Seattle is a safe haven for so many. Adding more surveillance technology will only increase crime and increase violence towards innocent people. Think about putting the funding for this into things that will actually help the Seattle community during this time |
| 4<br>6 | CCTV has no impact on deterring violent crime. It could be used for profound privacy violations.                                                                                                                                                                | None.                                                                                                                                              |                                      | CCTV is only a surveillance tool, it does nothing to prevent or address the causes of crime. Our resources could be deployed more valuable elsewhere.                                                                                                                              |
| 4<br>7 | I'm deeply concerns that the police will use the information gathered by this technology to violate people's privacy. I'm even more concerned that the federal government will get its hands on this information and use it to terrorize the people of Seattle. | None whatsoever.                                                                                                                                   |                                      | How the Trump administration could use the information gathered by this technology to promote its authoritarian agenda.                                                                                                                                                            |
| 4<br>8 | This technology will be implemented to profile individuals and create situations where folks are surveilled and monitored more than what is necessary to reduce crime. More cameras are not the answer here.                                                    | I see no value to this technology, and I see this as a thinly-veiled ruse to allow for more police intervention into daily life. This is dangerous |                                      | How this technology will truly be used, and if more police attention on the movement of the residents of Seattle is truly necessary (it's not).                                                                                                                                    |

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

s  
technolog  
y that is  
not aimed  
at crime  
reduction.

Increases to surveillance  
technology, especially at this  
time in history, is a foolish  
use of our resources.  
Especially considering that  
the federal government will  
seek any existing tool to  
harm immigrants, their  
political opponents, and  
people seeking abortion and  
gender care.

4  
9

In a  
utopian  
future I  
can  
envision  
ways that  
this tech  
could be  
used for  
good, but  
we don't  
live in a  
utopian  
future, we  
live now.  
As a  
result, any  
value it  
could  
derive  
must be  
evaluated  
against  
the harm  
it will  
cause,  
and the  
risk to our  
most  
vulnerabl  
e  
populatio  
ns are too  
great.

With the budget  
we have we can  
spend money  
catching people  
committing crimes  
— and in the  
process create  
tools for the  
current federal  
government to  
persecute  
minorities — or  
we can spend  
money improving  
our city and our  
citizen's lives,  
which has  
repeatedly been  
shown to prevent  
crimes. We should  
be doing the  
latter.

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0

Yes, I do have massive concerns about this technology in just the fact that it's yet another part of mass governmental surveillance that's been slowly expanding over the past few decades. The program already has already been likely used for helping track cross-state abortions. And as more and more states take away people's rights as we've seen over the past few years, it'll only be used for such purposes even further. Do not spy on citizens. Do not spy on your constituents. SPD is more than capable of doing its job without engaging in mass-surveillance.

None. Get rid of it. Now.

Consider whether it's worth conducting mass-surveillance on your constituents in exchange for extremely minor benefits, if any. Consider whether it's worth contributing to the erosion of both people's right to privacy, as well as assisting in interstate hunts for people trying to exercise their bodily autonomy. And don't lie to yourselves about how this will be "limited" or "only for certain criminal activities" because these kinds of things will and have always, always, ALWAYS expanded and have ALWAYS been co-opted. Please do not do this.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|        |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                         |                                                          |       |                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                        |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5<br>1 | There is no way to stop ICE from accessing CCTV footage. And, cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority. This technology is inappropriate under the rights-violating conditions being imposed by the GOP Administration. | A 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigator y benefits of CCTV has yet to develop.” The benefit of CCTV to public safety is questionable at best, while the harms from misuse (multiple instances confirmed in other locations) are significant. | No significant value!                                    | None. | The harms to civil rights (particularly in vulnerable/historically harmed communities. The cost of this technology is not justified, therefore (especially given the city's budget shortfalls). Other methods of improving public safety (such as violence interruption programs, and addressing root causes of crime) have been shown to be effective, and our money would be better spent on these. | Why is Seattle City leadership (and SPD) so intent on using surveillance technologies--ShotSpotter, GPS tracking devices that can be shot onto cars, CCTV, RTCCE? All are expensive; none with a research-based record of success elsewhere, and all with privacy/civil rights issues? |
| 5<br>2 | I am concerned it will be used by ICE to find and detain/deport our immigrant community members. Studies have shown it does not reduce crime.                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                         | none                                                     |       | The harmful effects it will have on our immigrant community members.                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                        |
| 5<br>3 | This is an invasion of privacy!                                                                                                                                                                                                                                                                                                                                                                                                                 | None                                                                                                                                                                                                                                                                                                                                                                                    | None                                                     | None  | For what purpose is this technology being used?                                                                                                                                                                                                                                                                                                                                                       | None                                                                                                                                                                                                                                                                                   |
| 5<br>4 | My fear is that it will be used by ICE and in general we don't need more surveillance.                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                         | I do not see this being of value to achieve a safe city. |       | The future. Our immigrants. Our privacy. Consider all of this.                                                                                                                                                                                                                                                                                                                                        | Please be aware of making decisions out of pressure from outside forces.<br><br>No.                                                                                                                                                                                                    |

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|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| 5<br>5 | We don't need spies in America!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Installed perhaps for the right reason but found to be useful for the wrong reasons like spying | The only value I see is in high crime areas                                                                                                             | That we are a free country and should be able to move about when we want and with whom we want.                                       |
| 5<br>6 | Surveillance expansion will target LGBTQIA+ community, immigrants, and BIPOC Youth.                                                                                                                                                                                                                                                                                                                                                                                                                                   | This will terrorize our immigrant communities on a daily basis more than they already are!      | NoneWa                                                                                                                                                  | Wa State is a safe haven. Surveillance tech takes this away.                                                                          |
| 5<br>7 | Unnecessary surveillance by an increasing surveilling government. This will potentially, eventually be used to target immigrants, protesters, etc.                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                 | None that outweighs the harm                                                                                                                            | Innocent people be targeted                                                                                                           |
| 5<br>8 | Privacy, especially use by ICE & other federal organizations.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                 | None. Not for individuals but certainly for ICE.                                                                                                        | Stop!                                                                                                                                 |
| 5<br>9 | This technology will not help with violent crime. The only study the SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.” It is rife for abuse, racial discrimination and providing personal data to ICE. There is no way to stop ICE from accessing CCTV footage. An SPD officer abused surveillance to stalk a “hot” SPD employee. |                                                                                                 | None.<br><br>If implemented, what processes would be put in place for oversight to ensure this does not become a tool of discrimination and harassment. | It doesn't work and it puts our civil liberties at risk.                                                                              |
| 6<br>0 | It can be used against minorities and other defenseless people                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                 | None                                                                                                                                                    | How the information could be used in a partisan way.                                                                                  |
| 6<br>1 | Freedom of movement for all people and social control this is not constitutional. This goes against personal rights . And does not speak to safety for citizens being targeted for ID and any other things those in power choose to target.                                                                                                                                                                                                                                                                           |                                                                                                 | None!                                                                                                                                                   | That this will not create safety, it will allow abuse in tracking people<br><br>Please slow down and consider the costs of this tech. |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

Freedom of movement for all  
of us.

6  
2

This expansion presents a clear danger to our community. Although it is viewed by some as a way of making our communities safer, it actually exposes us all, and particularly women and the LGBTQ community as well as marginalized ethnic groups, to authoritarian harassment. We really have a Big Brother who does not need more ways to watch us.

The value is not to ordinary citizens, but to an ever-growing authoritarian presence.

Research has shown CCTV has no significant effect on violent crime.

I am a retired lawyer and spent many years as a prosecutor. I do not make objection without considerable thought. We simply do not need to spend more money providing invasive surveillance.

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3  
Where do I begin? (1) CCTV, especially CCTV operated by SPD, represents a major threat to our civil liberties (a range of issues: privacy, footage being shared with other agencies, possibility of abuse & blackmail, targeting of vulnerable populations, etc. (2) CCTV has not been demonstrated to reduce crime or help in law enforcement investigation. (3) There are other, better tools that may be used. (4) I have ZERO confidence that this tool can be used fairly by SPD, an agency that has been required in the past to have federal oversight because of their lack of integrity, transparency and accountability

I see no value in the potential use of this technology; I see only the potential for abuse and further movement toward a police and government surveillance state.

I ask that our city leaders think very seriously about whether they want our city to more fully embrace the surveillance state, especially at a time when our nation's president is adopting the tactics of autocrats and fascists. This is not who we are and it is certainly not the style of government that I want my civic leaders to be adopting. This is particularly true in a city with a Police Department that has a not so noble past (and an out of control Police Officers Union). I will also note that extremely few SPD officers actually live in Seattle; thus, they wouldn't even be subject to the surveillance that their organization is promoting.

Do not go there.

6  
4  
police power overreach

recycling it into something to enable peace and kindness

teach police to talk to people, share the space with us and reach out in person.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|        |                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                       |                                                                                                                                |                                                                                                                                                       |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6<br>5 | Crime is lowering, no need to offer more tools to repressive regimes that can access the data (ice)                                                                                                                                                                                                                                                                                                                                                      | I see value in possibly decreasing prostitution on Aurora, if it's actually used!                                     |                                                                                                                                | Long term consequences to individual freedom, privacy and also increased targeting of minority pops.                                                  |
| 6<br>6 | It is not necessary for police use and could then be accessed and used in a damaging way by ICE.                                                                                                                                                                                                                                                                                                                                                         | None                                                                                                                  |                                                                                                                                | do whatever can be done to prevent the police by using a cloud platform for this information.                                                         |
| 6<br>7 | We know that these tools, which we're out in place by King County Housing Authority, have generated surveillance data ICE has searched looking for people. Not criminals—just immigrants in most cases that had no criminal record, but who could have their status revoked so they could be detained and deported. This is not in the spirit of separating state and local resources from federal ICE enforcement. Don't expand the use of these tools. |                                                                                                                       | I have a high degree of confidence in the police ability to investigate and prosecute crimes without these surveillance tools. | This is in effect spending city funds to surveil communities that include immigrants, for federal agencies that are totally out of control right now. |
| 6<br>8 | This can be used to track women seeking abortions. It is also a threat to LGBTQ people.                                                                                                                                                                                                                                                                                                                                                                  | I think it's dangers far outway any possible value.                                                                   |                                                                                                                                | I want them to consider the safety of all citizens.                                                                                                   |
| 6<br>9 | This is a gross invasion of privacy                                                                                                                                                                                                                                                                                                                                                                                                                      | I do not want to live in a surveillance state. This would give the government way too much power                      | None.                                                                                                                          | Don't use it. The potentials for abuse are maximal and we cannot trust the federal government to deal with it properly.                               |
| 7<br>0 | My privacy. Everyone's privacy.                                                                                                                                                                                                                                                                                                                                                                                                                          | My major concern is identifying who really is ICE, Proud Boys, Oathkeepers, another Lost Boy white supremacist group? | Not at this time.                                                                                                              | Following the Constitution and our Rights as US citizens.                                                                                             |

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| 7<br>1 | Tracking people and sharing this info with ICE is inhumane                                                                                                                               | That the information will be given to the highest bidder | Please don't install cctvs. It does not improve neighborhood safety. | How did you choose these locations? And how will you be using them in real time to prevent harm? |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
|        |                                                                                                                                                                                          |                                                          |                                                                      |                                                                                                  |
| 7<br>2 | Now, more than ever, we do not need an increase of the surveillance state. These technologies are seldom actually used for any social good and provide infinite opportunities for abuse. | None worthwhile enough to cover the bad.                 | Not to further erode individual privacy for the illusion of safety.  |                                                                                                  |

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CCTV will NOT reduce violent crime or aid in police investigations.

The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”

A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer.

A study of Dallas, TX found “[CCTV] cameras are likely not cost-effective in terms of increasing clearances” due to any increases in clearance rates being mostly limited to thefts.

Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved.

7 No independent study has  
3 found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates.

See above

See above

See above

See above

See above

NA

Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV.

Justice Department experiments have found “[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels.

Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors.”

CCTV poses a threat to civil liberties

Police had used camera networks to spy on “immigration protests”

There is no way to stop ICE from accessing CCTV footage.

Local police departments are very cozy with ICE casually sharing surveillance data.

And, cloud-based CCTV

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storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.

A cop in Texas has used a database of CCTV footage to search for someone that had an abortion. The cop was able to search CCTV footage from Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare. SPD officer abused surveillance to stalk a “hot” SPD employee.

The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...”

The University of Hull study also found “The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for ‘no obvious reason’ and on the basis of categorical suspicion alone.”

In Washington, DC a police lieutenant was caught using police surveillance technology to blackmail gay men.

CCTV camera operators have been caught using the cameras to spy on people. CCTV cameras open the door to expanding Automated License Plate Readers (ALPRs), facial recognition, and a host of algorithms that “examine” how people are walking to determine if they’re suspicious.

People’s brains act in a manner similar to “psychosis and social anxiety disorder” when they know they are being surveilled.

Police control CCTV camera, the cameras see what the police want them to see

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions.

Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray.

There are MANY effective tools the city could use to decrease community violence. Violence interruption programs work.

Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions suc

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CCTV has not been shown to have any impact on reducing violent crime, and has also not aided in the solving of crimes. More importantly, this technology HAS been used to profile, harass, spy on, and target American civilians, even those who have committed no crime. CCTV does not serve a public good, is frequently abused by police and law enforcement, and contributes to making our city and public spaces less free and less safe for all who live here. With the increase in illegal ICE raids that are sending our friends and neighbors who are lawfully in the United States and part of our communities to detention camps, any technology that increases surveillance plays an active role in destroying families and lives and destabilizing peace in our society. CCTV records being shared more widely and through cloud-based storage renders moot laws that have been put in place specifically to make Washington a sanctuary state for those who are being impacted by violence in other states, putting all of us in danger.

I have an academic background in German and Soviet studies, and I can say with confidence that the widespread use of these technologies gives us as citizens more in common with those living under oppressive authoritarian regimes than the free world in which we are told we supposedly live. None of us - NONE of us, not one, can consider ourselves truly safe or trust that our constitutional rights will be upheld if CCTV technology continues to be expanded. Our youth are already struggling with a mental health crisis as a result of feeling constantly observed through social media. How much worse will this become if they know that they are constantly, literally being observed by police through

None.  
There are many other proven ways to reduce violence in communities that do not cause the same level of active harm as CCTV surveillance.

This is an opportunity for City leadership to prove that you are committed to serving the people of Seattle. You play an incredibly important role in protecting us from dangerous laws that make all of us less safe, and this is a clear instance in which there is a right and a wrong choice. As an American citizen and a proud Seattleite of many years, I am much more afraid of what ICE and our supposed law enforcement would do with expanded CCTV than I am of the whatever violence the expansion of these technologies would supposedly curb. We know this technology does not work for the stated purpose of protecting the people - instead it actively undermines our liberties. Do not sell us out.

Please see the following links with more information and studies on the impact of CCTV:  
[https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1275&context=j\\_j\\_pubs](https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1275&context=j_j_pubs)  
<https://files.eric.ed.gov/fulltext/ED436943.pdf>  
<https://www.404media.co/emails-reveal-the-casual-surveillance-alliance-between-ice-and-local-police/>  
<https://www.thestranger.com/news/2025/05/02/80039485/what-jamie-tompkins-says-really-happened-at-spd>  
<https://www.washingtonpost.com/wp-srv/local/longterm/library/dc/dcpolice/stories/stowe25.htm>  
<https://www.bbc.com/news/uk-northern-ireland-27887275>  
<https://scitechdaily.com/what-happens-to-your-brain-when-you-know-youre-being-watched/>  
<https://www.bloomberg.com/news/articles/2011-12-27/when-police-abuse-surveillance-cameras>

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cameras? The notion of expanding CCTV around high schools in particular, namely Garfield High School, will do nothing to keep our children safe and will only contribute to increasing their difficulties.

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7  
5  
I have strong concerns about using the technology to make worse existing (unintentional) biases in law enforcement, profiling, and privacy. Obviously our founding fathers would not have such technology, but the Constitution and Bill of Rights protections against unreasonable searches and seizures suggests they would have been opposed.

It's a dangerous slippery slope into Big Brother authoritari an usage of surveillance footage.

There is little benefit, vs the social costs and toll on society of using it.

Please consider that once in use, there is no turning back. Conceptually, yes, but in reality, once it's in use, surveilling society become normalized.

If there were a more trustworthy group of people leading the federal executive branch, I might have different feelings. But those would be wrong. We must assume that eventually selfish, bad actors might take control--as they have--and use surveillance footage for bad purposes. Even if you are a fan of the current federal administration, there's the possibility that an administration you don't support comes into power--do you want that footage in their hands?

7  
6  
The security of vulnerable people is in jeopardy. This includes domestic violence victims and others. It takes away privacy and personal rights. It is being abused even as I write this.

It is being abused used at this point so NO!

That they are putting people in danger for living their normal legal lives. Big brother is constantly watching. It takes away our liberty.

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1. CCTV will NOT reduce violent crime or aid in police investigations.

\* The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”

\* A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer.

\* A study of Dallas, TX found “[CCTV] cameras are likely not cost-effective in terms of increasing clearances” due to any increases in clearance rates being mostly limited to thefts.

\* Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved.

\* No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates.

\* Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV. Justice Department experiments have found “[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels. Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors.”

2. CCTV poses a threat to civil liberties

\* Police had used camera networks to spy on “immigration protests”

\* There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy

4. There are MANY effective tools the city could use to decrease community violence

\* Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%.

The city could scale effective community-led solutions such as the Regional Peacekeepers

Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action

Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. These

None. Especially in the current police state leaning climate.

Think about your commitment to the values of our city and do NOT do anything that betrays those values and feeds directly into the attacks on our protected residents. In other words, say NO to increasing surveillance that has shown no benefit but HAS shown harm.

Don't do it. We protect our residents and ICE doesn't.

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with ICE casually sharing surveillance data. And, cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.

\* A cop in Texas has used a database of CCTV footage to search for someone that had an abortion. The cop was able to search CCTV footage from Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare

\* SPD officer abused surveillance to stalk a “hot” SPD employee

\* The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...”

\* The University of Hull study also found “The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for ‘no obvious reason’ and on the basis of categorical suspicion alone.”

\* In Washington, DC a police lieutenant was caught using police surveillance technology to blackmail gay men.

\* CCTV camera operators have been caught using the cameras to spy on people.

\* CCTV cameras open the door to expanding Automated License Plate Readers (ALPRs), facial recognition, and a host of algorithms that “examine” how people are walking to determine if they’re suspicious.

\* People’s brains act in a manner similar to “psychosis and social anxiety disorder” when they know they are

programs save money, research has shown every \$1 invested saves \$33.

\* Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime.

\* Both violent crime and property crime can be reduced by community investments.

Investments restoring vacant land, the presence of street lighting, increasing public transportation, and community non-profits that tackle violence and build

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being surveilled.

3. Police control CCTV camera, the cameras see what the police want them to see

\* Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions.

\* Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray.

community

lead to reductions in both violent crime and property crimes.

\* Maintaining green spaces has been proven to reduce violence. Green spaces reducing violence has been extensively researched.

\* Many communities across the country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community.

\* Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities, and access to affordable housing.

\* Poverty and income inequality are associated

with  
violence,  
especially  
assault and  
homicide.  
Inequality  
predicts  
homicides  
better than  
any other  
variable.  
Evidence  
supports  
that this is  
a causal  
link. And  
direct  
income  
support has  
been found  
to reduce  
firearm  
violence.

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Opening  
libraries  
and  
expanding  
library  
hours both  
reduce  
violence  
and  
property  
crimes.

\*

Increasing  
access to  
healthcare  
decreases  
crime.  
Unfortunat  
ely,  
decreasing  
access to  
healthcare  
increases  
crime.

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|   | <p>I urge you to prevent the use of CCTV for the following reasons:</p> <p>CCTV will NOT reduce violent crime or aid in police investigations.</p> <p>The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”</p> <p>A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer.</p> <p>A study of Dallas, TX found “[CCTV] cameras are likely not cost-effective in terms of increasing clearances” due to any increases in clearance rates being mostly limited to thefts.</p> <p>Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved.</p> <p>No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates.</p> <p>Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV. Justice Department experiments have found “[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels. Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors.”</p> <p>CCTV poses a threat to civil liberties</p> <p>Police had used camera networks to spy on</p> | <p>There are MANY effective tools the city could use to decrease community violence</p> <p>Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%.</p> |  |                             |                                                                                                                                          |
| 7 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                             |                                                                                                                                          |
| 8 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  | More effective alternatives | Please stop the implementation of CCTV use in public. Make investments in communities that have been proven to get good results instead. |
|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                             | No CCTV in Seattle!                                                                                                                      |

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“immigration protests”

There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. And, cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.

A cop in Texas has used a database of CCTV footage to search for someone that had an abortion. The cop was able to search CCTV footage from Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare. SPD officer abused surveillance to stalk a “hot” SPD employee.

The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...”

The University of Hull study also found “The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for ‘no obvious reason’ and on the basis of categorical suspicion alone.”

In Washington, DC a police lieutenant was caught using police surveillance technology to blackmail gay men.

CCTV camera operators have been caught using the cameras to spy on people.

CCTV cameras open the door to expanding Automated License Plate Readers (ALPRs), facial recognition, and a host of algorithms that “examine” how people are walking to determine if they’re

These programs save money, research has shown every \$1 invested saves \$33.

Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime.

Both violent crime and property crime can be reduced by community investments.

Investments restoring vacant land, the presence of street lighting, increasing public transportation, and community non-profits that tackle violence

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suspicious.

People's brains act in a manner similar to "psychosis and social anxiety disorder" when they know they are being surveilled.

Police control CCTV camera, the cameras see what the police want them to see

Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions.

Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray.

and build community lead to reductions in both violent crime and property crimes.

Maintaining green spaces has been proven to reduce violence. Green spaces reducing violence has been extensively researched.

Many communities across the country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community.

Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities, and access to affordable housing.

Poverty and income inequality are

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associated  
with  
violence,  
especially  
assault and  
homicide.  
Inequality  
predicts  
homicides  
better than  
any other  
variable.  
Evidence  
supports  
that this is  
a causal  
link. And  
direct  
income  
support has  
been found  
to reduce  
firearm  
violence.

Opening  
libraries  
and  
expanding  
library  
hours both  
reduce  
violence  
and  
property  
crimes.

Increasing  
access to  
healthcare  
decreases  
crime.  
Unfortunat  
ely,  
decreasing  
access to  
healthcare  
increases  
crime.

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| 7 | CCTV, as it is currently being used and disseminated, seems fine, but an expansion to the "Cloud," making it accessible by ICE, etc, would be very detrimental for our civil liberties, especially at this wrought time when ICE is being used as a secret police by a president who doesn't respect the rule of law and the Constitution.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                              |       |                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                               |                                                                                   |
| 8 | It an atrocity and must not be used. Government overreach is not something we voted for.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                              | None  | no                                                                                                                                                                                                                                                                                                             | The sanctity and privacy of each citizen.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                               |                                                                                   |
| 8 | <p>It's a threat to our immigrant community and those exercising their reproductive rights, and the Washington State laws enacted to protect them.</p> <p>Police have used camera networks to spy on "immigration protests." There is no way to stop ICE from accessing CCTV footage. And, cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with "sanctuary" laws, and non-police entities including the King County Housing Authority.</p> <p>Police in Texas have used a database of CCTV footage to search (nationwide!) for someone who had an abortion. They were able to search CCTV footage from Washington State, other states with "sanctuary" laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare</p> | <p>Research shows CCTV has "no significant effects on violent crime."The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes "no significant effects observed for violent crime" and "a body of research on the investigator y benefits of CCTV has yet to develop</p> | NONE. | <p>We have systems in place that are safer for citizens that work well. And there are many other approach es, such as violence interrupti on programs, and investmen ts in housing and mental health programs, that we could take to solve crime problems without the risks this system would place on us:</p> | <p>Refer to the points and data on this well-researched page: <a href="https://stopsurveillancecity.wordpress.com/closed-circuit-television-cameras-cctv/?utm_source=newsletter&amp;utm_medium=email&amp;utm_term=2025-06-21&amp;utm_campaign=Protect+our+immigrant+community+-+Stop+surveillance+expansion">https://stopsurveillancecity.wordpress.com/closed-circuit-television-cameras-cctv/?utm_source=newsletter&amp;utm_medium=email&amp;utm_term=2025-06-21&amp;utm_campaign=Protect+our+immigrant+community+-+Stop+surveillance+expansion</a></p> | <p>I feel so strongly about this, that if my representative or a city-wide council member votes to support this, I will work very very hard to see that they do not keep their seat in the next election.</p> | <p>Why was there not more publicity about this to solicit community feedback?</p> |
| 8 | I see the expansion of the cctv system as an unnecessary incursion into the privacy of the people of Seattle, I do not think it would benefit people whatsoever. There is the additional risk of this data falling into the hands of ICE, where it may be used to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                              |       |                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                               |                                                                                   |

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deport our neighbors. I do not believe that more cctv cameras will stop crime in the city, just impose on the people of Seattle.

CCTV will NOT reduce violent crime or aid in police investigations. CCTV does not reduce crime or make people feel safer. No independent study has found that Amazon Ring has any impact on crime or clearance rates. CCTV poses a threat to civil liberties. Police have used the camera networks to spy on "immigration protests". There is no way to stop ICE from accessing CcTV footage. Cloud based CCTV storage means ICE is able to search nationwide databases of CCTV footage including  
8 CCTV footage from police  
3 footage from police departments in Washington State, other states with "sanctuary" laws, and non-police entities including the King County Housing Authority. CCTV camera operators have been caught using the cameras to spy on people. CCTV cameras open the door to expanding Automated License Plate Readers (ALPRs), facial recognition, and a host of algorithms that "examine" how people are walking to determine if they're suspicious.

Police control CCTV cameras, the cameras see what the police want them to see.

Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions. Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Deptment repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray. Both violent crime and property crime can

Consider the mental health harm caused to a person who knows he/she/they are being surveilled. People's brains act in a manner similar to "psychosis and social anxiety disorder" when they know they are being surveilled.

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|        | be reduced by community investments. Investments restoring vacant land, the presence of street lighting, increasing public transportation and community non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes.                                                                                                                              |                  |                   |
| 8<br>4 | Invasion of privacy, lack of data security, potential for misuse of information, dangerous surveillance state during a time of misuse if power                                                                                                                                                                                                                                                          | Abuse of privacy | Do not allow this |
| 8<br>5 | While CCTV units can be helpful in preventing and combating crime, they also retain the capacity to provide government agencies with means to control the population at large. Given the current political climate with right-wing, fascist-leaning actors in the national administration, I believe adding CCTV capacity poses a risk to the entire population and should be paused at the very least. |                  |                   |

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| <p>I do not want to live in a world of surveillance. There is no need to expand what already feels like over reach of people's right to privacy. All the cameras on people feels truly Orwellian. Do not add to it!</p> | <p>I suppose if a child or elderly person with dementia was 'last seen' by one of those cameras it could be useful, but what seems to be happening at this time feels sinister really. Targeting POC, LGBTQ folks feels facist.</p> | <p>Do not expand it. Use the funds you would use for this and put it toward affordable housing, food insecurity, health care, and/or education. There are so many things the city need right now, and more surveillance is not one of them!</p>                   |
| <p>8<br/>7 it violates human rights</p>                                                                                                                                                                                 | <p>i'm sure there is value but not as it is being used</p>                                                                                                                                                                          | <p>protect the people of seattle. FIGHT ICE. They are imprisoning innocent people and keeping them in barbaric conditions</p>                                                                                                                                     |
| <p>8<br/>8 Privacy. Government using information against the people. Enabling autocracy.</p>                                                                                                                            | <p>None.</p>                                                                                                                                                                                                                        | <p>Reduce use and access to military-like tools in everyday policing</p>                                                                                                                                                                                          |
| <p>8<br/>9 Its use for surveillance of individuals based on their race, lifestyle or immigration status.</p>                                                                                                            | <p>It will be difficult to restrict access later on if desired.</p>                                                                                                                                                                 | <p>I do not see Wisdom in giving this data to ICE. Giving ICE data to pursue individuals for incarceration, intimidation or deportation will increase the militarization of our society and decrease</p> <p>Do not allow ICE to have access to Seattles data.</p> |

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|    |                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                              | liberty for us all.                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                           |                                                                                                                                                 |     |
| 90 | All humans deserve safety in their homes and in their lives and with their families                                                                                                                                                                                                                                                                                                               | None                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                | Civil liberty                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                           |                                                                                                                                                 |     |
| 91 | More intense surveillance state in a city where we uphold a lot of freedoms. I would rather fund the police and have heavier checks and balances for our local government and police than put something into place that makes the people scared. There is a worry face recognition will be used and people will not be able to peacefully protest anymore. Loss of a sense of freedom in seattle. | Maybe catching criminals which is a very very small portion of our society, so that still puts regular people up for scrutiny. A lot of our crime rights are also tied to our houselessness problem. I would rather have more funding for police/social services to integrate more intense help/violence break up for people on the streets. | How will it be used? What are all of our rights to not be on camera/just stay out of seattle? How does this benefit the general public who are not criminals and do not want to be in a surveillance state? What is the push for Seattle to implement these measures? What is the environmental impact as far as storing these/these would be a massive amount of data which takes plenty of resources, how will you protect our environment?? | Regular citizens feel it is against our freedoms to constantly be watched in public. It is already an issue with random people filming in public. I worry about the right to assemble, the right for peaceful protest. If our freedoms are stripped and people are seen going into institutions like planned parenthood for any reason, they could be questioned. | Listen to the people and stand strong in Seattle. All of this shouldn't be done "under the table". People need to know exactly what you're doing and why. | I hope our representatives choose not to do this. It would be better to criminalize hard drugs and create a stronger police force than do this. |     |
| 92 | It adversely impacts our BIPOC and potentially our LGBTQIA+ communities.                                                                                                                                                                                                                                                                                                                          | I don't believe this is about crime prevention. Wouldn't we be better served by using the same monies on intervention                                                                                                                                                                                                                        | None                                                                                                                                                                                                                                                                                                                                                                                                                                           | See #2                                                                                                                                                                                                                                                                                                                                                            | Vote NO                                                                                                                                                   | Remember, this is NOT about crime "prevention".                                                                                                 | N/A |

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|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |      |    |                                                                             | n and support solutions? I'm tired of seeing my tax dollars wasted on things that don't deliver results.                                                                                                                                                                               |
|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |      |    |                                                                             | As is of course planned, this technology will predominantly impact already marginalized and overpoliced communities that already experience the state monopoly on violence more than any other community.                                                                              |
| 9 | The Constitution's foundation is the fundamental right to an individual's privacy. This is protected in many places. The 5th amendment requires that police have a warrant to follow you and to track your movements. SPD's use of SDOT cameras violated that because they will be able to watch us no matter what we are doing. Millions of innocent people will be tracked by a government and the police will be able to access illegal amounts of information that they'd never otherwise have access to. | None | No | Do you want to be watched during your back door dealings with big business? | You already have so many new cameras through those kiosks throughout downtown why do you need more? Is SPD so ineffective they can't do anything without violating every Seattleite's rights?                                                                                          |
| 3 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |      |    |                                                                             | . The city should be ashamed that they are planning to surveil the LGBT, black, and Asian communities more than any others. These are hard working communities that come to Seattle for a better life to and contribute constantly to our collective well-being. Can SPD say the same? |

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| 9<br>4 | There already exists a method by which SPD can acquire CCTV footage. It's called getting a warrant with probable cause. The framers knew that the government would try to invade every aspect of our lives and created protections so that our private lives would be sacrosanct. If SPD can't get it with a warrant, perhaps no crime was committed.                                                                                                                                                                                                                                                                                                                                                                                            | This is just a weak excuse to be able to throw our vulnerable populations in prison. Who knew that Seattle wanted to be as fascist as Florida and Trump? | None | Hands off our privacy | Give us the CCTV footage of your closed door meetings in which you force out the only city leaders who care about their communities.                                                                                                                                                                          |
| 9<br>5 | I am appalled that this technology is being marketed to me as something that will make our city safer. This is a thinly veiled attempt at turning Seattle into an even stronger surveillance state that seeks out, tracks, and punishes BIPOC, immigrants, the unhoused, and the LGBT community. This technology will do nothing but harm marginalized communities. This technology will be used to kidnap and brutally deport people. SPD is ineffective and incapable of protecting our community. I would be stupid to believe that this technology would be used to "protect and serve" anyone but the wealthy, white, conservative class who want nothing more than to stamp out any semblance of difference or diversity in our community. |                                                                                                                                                          | None |                       | You claim that this city is welcoming to all, yet entertain these fascist police-state technologies. I do not feel safe here anymore. And it's not because of the "crimes" committed by the unhoused, POC, immigrants etc... it is because of SPD and its brutality and insistence on tracking our movements. |
| 9<br>6 | These are not normal times. Please do not increase surveillance on everyone                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                          |      |                       | Stored, searchable, sharable data collected for what-if situations can easily be used for nefarious purposes. This is not the time to potentially assist bad actors                                                                                                                                           |

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1) This is warrantless dragnet surveillance. All video being stored for 30 days means SPD would be mapping people's lives being able to figure out where people live, where they work, where they worship, the routes they take to work, etc. This map would be available to SPD & everyone with access to SPD's data. There is no legitimate use for this kind of map, all it does is create conditions where abuses are both easy & incredibly disastrous. These abuses aren't hypothetical. In recent weeks we've seen small-ish abuses like yet another SPD officer getting caught using a police database to stalk someone to massive like ICE & cops looking for people who've had abortions accessing nationwide surveillance databases. Those nationwide searches included data from Washington State despite the state's Keep Washington Work and Shield laws.

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7 The only reason reporters haven't discovered that SPD's existing data is being abused in nationwide searches like this is because SPD's CCTV & RTCC program has only been live for a month. There hasn't been any time for reporters, community members, anyone to get records on data access. There's barely been time for SPD's data to even be shared because it just went live at the end of May. SPD is ramming through this expansion before there's a chance for the community to see the full impacts of SPD's existing dragnet surveillance,

SPD storing this a private, for-profit company's cloud guarantees this data will be shared. These systems are built to make data sharing between agencies as frictionless as possible, that's part of the sales pitch.

This is functionally a secret expansion of surveillance. SPD has not done any

None, CCTV cameras don't reduce crime or increase clearance rates, they don't even make people feel safer. This has been studies repeated. Lots of studies showing this were submitted just last year when SPD was first asking for these technologies (the single study SPD included in the original SIR showed this). Not going to resubmit all of the studies because they were submitted just last year

How do you think any guardrails will keep the Trump Administration & ICE from accessing this data given their constant & blatant disregard for the law? How do you justify increasing surveillance now when ICE is kidnapping people on Seattle's streets with the assistance of SPD? How is there money for even more mass surveillance when the city is facing a budget deficit? Especially, when this is shown to not reduce violence. Why do things that are proven to reduce violence (ex. housing access, food access, mental health access, libraries, & violence intervention programs) constantly get defunded while surveillance that doesn't reduce violence gets more money? How do you think having Seattle under surveillance by the Trump Administration & ICE will impact tourism?

Keeping people in Seattle safe would require removing this & other surveillance by SPD and using that money to fund programs that are shown to reduce violence.

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community outreach to let the public know this is being considered. SPD hasn't even done a press release or a post on social media. The only reason people know this is happening is because community members found single Seattle IT webpage that mentions it & have spread the word. There cannot be any consent of the governed/community consent because SPD hasn't let them know it is happening.

Being subjected to constant surveillance is harmful. Whose Streets Our Streets identified the level of surveillance in Seattle as already having "a psychological effect on the people being surveilled" (<http://stopsurveillancecity.files.wordpress.com/2024/09/38c7-wsautomatedenforcementsummary.pdf>) and that was before SPD launched its CCTV & RTCC pilot. The effect is that people's brains act in a manner similar to "psychosis and social anxiety disorder" (<https://scitechdaily.com/what-happens-to-your-brain-when-you-know-youre-being-watched/>). Expanding surveillance will increase these impacts and make people less safe.

There is no reason to believe any information SPD has provided for this material update or the underlying SIR given SPD's lengthy history of lying during the SIR process. Just last year, SPD definitely told the people of Seattle that it would not be actively monitoring CCTV cameras which was a lie, the minute the cameras were approved SPD demanded more money from the city to hire people to do active monitoring claiming that was the only way for them to work. SPD has also lied in the SIR for FLIR (<https://www.realchangenews.org/news/2024/08/07/inside-spd-s-use-aerial-surveillance-during-2020->

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protests), and just last month SPD provided misled people during the SIR for StarChase/pursuit mitigation trackers by claiming it was required to conform to WA law (The law does not say that, it says police departments should end each individual pursuit as soon as possible based on existing policies & technology, not that departments need to acquire new technologies).

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It's an equity nightmare, cameras are being deployed in neighborhoods with disproportionately high numbers of renters, people of color, and poor people. This constant surveillance has negative effects on our health, it does not make a city better to feel that we are constantly being watched. This gives more discretion to SPD which has already shown it cares more about cracking down on protesters and gay people than it does about solving crimes that affect people. Giving cops who do not share values with the majority of people in Seattle or live in Seattle themselves access to cameras that can constantly monitor us is hostile to the people who live here and spending our money on it is an insult. It won't improve safety. People who are committing crimes aren't deterred by a camera that they might not even know exists. SPD has constantly demonstrated malice against those who don't agree with their broadly right wing values in the ways they violently assault and pursue people exercising speech in opposition to them. Giving those people access to cameras to watch seattleites 24/7 is a crime in and of itself. It will be abused and it reduces our perception of safety and security to feel that we're constantly under observation.

This increase in the amount of networked surveillance also gives power to entities outside the city like the federal government and ICE and allows them to exercise control in this city contrary to the will of its people. Creating this surveillance in the first place is a huge liability because it is inevitable that outside agencies will eventually be able to access it. When that happens, we the citizens of this city will not have any say in how that footage is used by unaccountable people

To the people of Seattle it provides no value. To a repressive federal government and sadistic police, it gives them more power to exercise at their discretion to harm people.

Consider that the pilot program itself was immensely unpopular with public comment being extremely slanted against it and with the city's own committees on equity and public safety recommending against it. This further expansion will continue to damage the reputation of elected officials if they demonstrate once again that they are more accountable to police unions and the DSA than the actual people who elect them and can decline to re-elect them.

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from far away places. It allows repression of immigrants and people seeking abortion at a minimum and can be used against even more people if the federal government decides to. The city which is already miserable will only become more miserable when those of us who live in the actual city are constantly monitored like an open air prison and the people in single family homes on the north end get to continue their lives as usual.

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I'm concerned information will be shared with ICE who will illegally abduct and detain immigrants. I also fear that as the country moves increasingly in the direction of fascism, that surveillance technology like this will be used to suppress our civil liberties. We do not want to live in a police state, and as such, the pros and cons of increasing surveillance technology should be carefully considered.

I presume it could be useful for finding people who have committed violent crimes and prosecuting them. However, from what I've read the use of

Please protect our city from sliding into a police state. The SPD and other law enforcement agencies should be kept separate from the agenda of the current US administration.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

CCTV has  
not  
reduced  
violent  
crime.

I oppose expansion of  
surveillance on Seattle  
people, particularly targeting  
queer and bipoc people. This  
data will help feds unlawfully  
kidnap people off the streets

As the Federal Government  
lurches towards a politicized  
police state, NOW is not the  
time to increase police  
surveillance powers,  
especially if it will be shared  
with ICE.

I oppose increased  
survalence of Seattle streets  
that would further enable the  
unconstitutional actions of  
Trump regime.

There are  
no  
protections  
for seattle  
citizen  
constitutio  
nal rights in  
this plan.

It's great  
to use to  
save  
endanger  
ed  
species.

Don't make  
the  
residents of  
Seattle an  
endangere  
d species.

Reread the the  
book 1984.

It will be used to punish  
specific people and  
populations, such as people  
of color. It will impact  
privacy. It could be used to  
create databases of people  
for sexual and other crimes.

It could  
be used  
to solve  
crimes,  
but there  
doesn't  
seem to  
be a lot of  
evidence  
that it  
works for  
that  
purpose.

Right now the  
federal government  
is ignoring laws all  
over the country.  
We don't need to  
give them more  
tools.

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|  | <p>I am deeply concerned about the expansion of CCTV in Seattle. First, there is no body of evidence suggesting that CCTV will reduce violent crime or aid in police investigations. SPD cites a single study in its justification; however the meta-analysis that SPD cites found no significant effects on violent crime and determined that there was no body of research on the benefits of CCTV. These findings are echoed by studies in the UK and Texas which found the technology did not reduce crime or improve public safety. Second, CCTV threatens our civil liberties. It is deeply vulnerable to misuse by individual authorities and ICE, leaving Seattle residents vulnerable, particularly immigrants, people of color, and people accessing abortion care. Given the lack of evidence and the threat to our civil liberties, this expansion would be a misuse of city funds.</p> | <p>I see absolutely no value in the use of this technology. Particularly when our city is strapped for funds are there are evidence-based ways to reduce crime and improve safety. As a resident of Capitol Hill, I am deeply concerned about the negative impact that the proposed CCTV expansion will have on our right to privacy and our civil liberties.</p> | <p>City leadership should consider the many effective tools that exist to decrease community violence. For example, neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could also further invest in/expand models, such as the the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention. The Restorative Resolutions project led by the Rainier Beach Action Coalition has reduced violence in the Rainier Beach neighborhood by 33%. There are promising evidence-based solutions that are cost-effective and present far better options for our city!</p> | <p>Who has SPD consulted in their planned expansion of CCTV in Seattle?</p> |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|

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|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                                                                                                                                                                                                                                                    | I am very concerned that this was proposed as a limited trial in a few neighborhoods – and now, just weeks after the cameras are operational – SPD is pushing for it to become permanent and expanded to new areas. The public review process for this tech saw a huge amount of popular opposition. City Council went ahead and approved it anyway – but with the caveat that it was to be a trial run to see if it actually had an impact on crime, and if the footage actually was secure from misuse by other agencies who do not share our values. This has not been anywhere near enough time to evaluate these |                                                                                                                                                       |                                                                                                                                                                         |                                                                                                                                                                                |
| 1 | CCTV poses a serious threat to our civil liberties in this time of increasing national authoritarian government. Even with the supposed safeguards put in place with the legislation authorizing CCTV, there is ever reason to beleive that footage from these cameras will end-up in the hands of ICE or other                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                       |                                                                                                                                                                         |                                                                                                                                                                                |
| 0 | enforcement who use it to try to enforce laws that directly contradict our values and laws in Seattle and the State of Washington. The risk of this misuse of this footage is too great, and the value of the cameras is too little. Seattle Police keep saying this tech will reduce violent crime – but there is zero evidence that it does, and only modest evidence that it reduces property crimes (ie crimes of being poor). |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                       |                                                                                                                                                                         |                                                                                                                                                                                |
| 5 |                                                                                                                                                                                                                                                                                                                                                                                                                                    | I see no value in this tech. We should not have it in our city.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Why is the current city administration bowing to ever whim and demand of SPD, especially considering the severe budget crunch we will soon be facing? | The voice and will of the people, who have been overwhelmingly opposed to this tech! Take a look at the public comment section of the surveillance impact report again. | Perhaps listen to your own experts - the Surveillance community working group opposed CCTV during the review process. Why don't you find out more about why they were opposed? |

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|-------------|-----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|----|--|---------------------------------------------------------------------------------------------------------------------|--|
|             |                                                                                                                       | questions.<br>It is against<br>the spirit of<br>the tech<br>review<br>process<br>and the<br>massive<br>amount of<br>feedback<br>provided by<br>the public<br>expressing<br>reservation<br>s about this<br>tech to<br>now decide<br>the trial<br>period is<br>over. |                                                                                                                                                 |                                                                                                                                                                                                                                                         |                                                              |    |  |                                                                                                                     |  |
| 1<br>0<br>6 | This technology will target<br>the LBGQTQIA and BIPOC<br>youth.                                                       |                                                                                                                                                                                                                                                                    |                                                                                                                                                 |                                                                                                                                                                                                                                                         |                                                              |    |  | We do not need<br>tombe assisting<br>ICE with targeting<br>groups.                                                  |  |
| 1<br>0<br>7 | Violations of privacy and my<br>constitutional rights. This<br>information being shared and<br>feed into AI platforms |                                                                                                                                                                                                                                                                    | None                                                                                                                                            | No                                                                                                                                                                                                                                                      |                                                              |    |  | How the police<br>have proven again<br>and again that<br>they act in racist,<br>prejudiced ways<br>towards citizens |  |
| 1<br>0<br>8 | Unlawful surveillance of<br>American citizens which<br>would arrogate our civil<br>rights.                            | That it<br>would get<br>into the<br>wrong<br>hands.                                                                                                                                                                                                                | The price<br>is too high<br>for its<br>benefits.<br>We would<br>be turning<br>Seattle<br>into a<br>surveillan<br>ce state<br>similar to<br>NYC. | I'm sure it<br>would<br>make SPD<br>& ICE's jobs<br>easier to<br>the<br>detriment<br>of our<br>democracy.<br>I have<br>much<br>greater<br>trust in the<br>local police<br>but none in<br>A's which is<br>kidnapping<br>Americans<br>off our<br>streets. | That it would get<br>into the hands of<br>autocratic forces. | No |  | No                                                                                                                  |  |

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I would request the city not expand its use of CCTV in public spaces. My concerns are related to the threat CCTV use could have for individual civil liberties. While CCTV use in private facilities, may reduce property crimes; widespread use in public areas has not been shown to reduce violent crimes. Constant monitoring of CCTV is impractical and expensive and liable to be biased, and should not be a substitute for more effective tools of community policing, violence interruption programs and preventive community-centered approaches to deal with the underlying causes of crime.

There is value in using CCTV in privately-owned, low-patrol areas, for instance to decrease car thefts in parking areas or to help identify shop lifters.

The cost of the technology versus its very questionable results and the adverse effects possible for individual civil liberties. It can't replace having a human presence in areas affected by higher crime rates.

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Surveillance technology will NOT aid law enforcement in solving crime.  
 -In a 40 year systematic review with meta-analysis of the efficacy of CCTV the authors concluded there were “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”  
 -We should not be spending money on surveillance efforts that lack evidence of significant impact on violent crime.

CCTV also poses a threat to civil liberties.  
 -The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...”. The study also found “The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for ‘no obvious reason’ and on the basis of categorical suspicion alone.”  
 -CCTV footage can be misused by ICE and there is no way to stop ICE from accessing it.

Can funds be redeployed to effective community investments?  
 -Both violent crime and property crime can be reduced by community investments like restoring vacant land, the presence of street lighting, increasing public transportation, and community non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes.  
 -Poverty and income inequality are associated with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence.

Not only is this an unnecessary invasion of privacy, targeted mostly at POC neighborhoods, but these data are being used by ICE to facilitate deportations and by states with gender affirming/abortion care bans to prosecute people. I totally

none at all

Consider that the costs to vulnerable people outweigh any positive use of this technology.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

object to generating this sort of data.

|   |                             |        |               |
|---|-----------------------------|--------|---------------|
| 1 | It will endanger privacy of | not    | Do not use it |
| 1 | targeted groups             | needed |               |
| 2 |                             |        |               |

|   |                                                                                                                                                                                                                                              |      |                                                                                                                                                                                                          |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | I am against surveillance in Seattle. I do not want police or artificial intelligence systems to watch me and my family as we go about our lives. Surveillance leads to self-censoring and a loss of individuality, creativity, and privacy. | None | The harmful impacts of surveillance and policing fall disproportionately on individuals who have already experienced violence from white supremacy and colonialism. This program is structurally racist. |
| 1 | I do not want the federal government to legally or illegally access surveillance data collected in Seattle.                                                                                                                                  |      | City leaders should stop pursuing these police technologies and instead use the millions they would cost on public-health-based safety and community supports, like housing, food access, and libraries. |
| 3 |                                                                                                                                                                                                                                              |      |                                                                                                                                                                                                          |

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| 1 | "or until determined that all evidence material to an incident under investigation has been transferred to SPD's secure digital evidence lockers." is an exception wide enough to drive a truck through. I understand the need to allow extended investigation under extreme cases, but it still needs a hard limit or it will be abused with the best will in the world. Furthermore, evidence transferred to | This information should not be transferred to or accessible by non-SPD law enforcement except in specific investigator y cases that have been |
| 1 |                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                               |
| 4 |                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                               |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

digital evidence lockers should be deleted after 10 years unless it has actually been used in a case.

reviewed by an SPD liaison as consistent with Seattle and Washington State priorities for enforcement. The individual sphere of liberty for Washingtonians outweighs the political interest of politicians a thousand miles away.

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I think this technology will harm the communities it is imposed upon. Surveillance does not materially change the existence of crime, only oppresses those who have been put into situations of survival. A better use of funds would be more equitable housing, free higher education, more free food, more free hygiene facilities, more mental health care, rehabilitation facilities, free medical care, the list goes on and on. Surveillance solves no problems. It's a waste of resources.

None

It's useless and will inflict more harm than good.

Who may have access to this footage? Will this assist in the mass kidnappings perpetrated by ICE? What is the root cause of crime in these areas and how can you address that instead of criminalizing humans?

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My concern lies in the misuse of such equipment to wrongfully convict folks, over policing of neighborhoods, the ethical concern of being constant surveillance.

I do not see a value in the use of this technology when other systems to help us already exist

Please take into account the overreaching effects of this decision and the ways it may harm our local communities.

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1 This technology infringes on<br/>1 the civil liberties of people<br/>7 who have committed no<br/>crimes, and exacerbates the<br/>already disproportionate<br/>targeting of the young,<br/>people of color, LGBTQIA<br/>people, etc, and does not<br/>require a warrant.</p>                                                                                                                                                                                                 | <p>WA state<br/>and Seattle<br/>are facing a<br/>budget<br/>crisis and<br/>are facing<br/>record<br/>costs due<br/>to lawsuits<br/>against SPD<br/>and other<br/>agencies.<br/>There is no<br/>reason to<br/>believe that<br/>this will<br/>reduce<br/>crime or<br/>increase<br/>case<br/>resolution<br/>and every<br/>reason to<br/>believe it<br/>will be<br/>abused in<br/>ways that<br/>end up<br/>costing<br/>even more<br/>money.</p> | <p>Negative<br/>value due<br/>to<br/>monetary<br/>cost for<br/>products,<br/>loss of<br/>civil<br/>liberties,<br/>liability<br/>issues,<br/>and other<br/>harms to<br/>our<br/>communit<br/>ies with<br/>no proven<br/>value to<br/>reduce<br/>crime</p> | <p>There are<br/>programs<br/>that really<br/>do reduce<br/>crime that<br/>this money<br/>could go to<br/>if it is truly<br/>burning a<br/>hole in the<br/>city's<br/>metaphoric<br/>al pocket,<br/>although<br/>we all know<br/>there is a<br/>shortfall.<br/>What are<br/>you even<br/>thinking.</p> | <p>Surveillance<br/>makes us all less<br/>safe and it is hard<br/>to put the cat back<br/>into the bag once<br/>this sort of thing is<br/>normalized.</p> | <p>Seattle and WA<br/>cannot afford this<br/>wasteful proposal<br/>and SPD has not<br/>shown that it can<br/>be trusted with<br/>what it already has.<br/>Seeking these kinds<br/>of solutions has<br/>proven to be a huge<br/>embarrassment in<br/>other cities where it<br/>has not worked.</p> | <p>I get that people want to<br/>feel safe, but this is an<br/>irresponsible use of funds<br/>that will not work,<br/>especially given that there is<br/>data supporting other<br/>effective solutions.</p> |
| <p>1 Additional surveillance and<br/>1 tracking of citizens incurs the<br/>8 very real risk that the data<br/>will be used at the local level<br/>to unfairly target traditionally<br/>oppressed segments of our<br/>population. Additionally, this<br/>data could be shared,<br/>willingly or unwillingly, with<br/>our increasingly authoritarian<br/>federal government to target<br/>immigrants and other people<br/>the administration wishes to<br/>silence or deport.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>There is<br/>little or no<br/>demonstr<br/>ated value<br/>in<br/>increased<br/>CCTV<br/>surveillance.</p>                                                                                                                                             |                                                                                                                                                                                                                                                                                                        | <p>Consider the very<br/>real likelihood<br/>that it will be<br/>abused at the<br/>expense of<br/>vulnerable<br/>populations.</p>                         |                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                             |

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CCTV will NOT reduce violent crime or aid in police investigations.

The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”

A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer.

A study of Dallas, TX found “[CCTV] cameras are likely not cost-effective in terms of increasing clearances” due to any increases in clearance rates being mostly limited to thefts.

Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved.

No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates.

Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV.

Justice Department experiments have found “[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels.

Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors.”

CCTV poses a threat to civil liberties

Police had used camera networks to spy on “immigration protests”

There is no way to stop ICE from accessing CCTV footage.

Local police departments are very cozy with ICE casually sharing surveillance data.

And, cloud-based CCTV

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storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.

A cop in Texas has used a database of CCTV footage to search for someone that had an abortion. The cop was able to search CCTV footage from Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare. SPD officer abused surveillance to stalk a “hot” SPD employee.

The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...”

The University of Hull study also found “The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for ‘no obvious reason’ and on the basis of categorical suspicion alone.”

In Washington, DC a police lieutenant was caught using police surveillance technology to blackmail gay men.

CCTV camera operators have been caught using the cameras to spy on people. CCTV cameras open the door to expanding Automated License Plate Readers (ALPRs), facial recognition, and a host of algorithms that “examine” how people are walking to determine if they’re suspicious.

People’s brains act in a manner similar to “psychosis and social anxiety disorder” when they know they are being surveilled.

Police control CCTV camera, the cameras see what the police want them to see

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Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions.

Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray.

There are MANY effective tools the city could use to decrease community violence. Violence interruption programs work.

Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions suc

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|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                    |                                                                                    | Please think about how you would feel with a camera following your every move, and every move of your children and your neighbors, in your own neighborhood. Now think about the Trump administration having access to that footage, and being able to use it for whatever purpose they see fit. Imagine next month or next year, if the Trump administration has passed the anti-mask laws that they have threatened to pass, and how you could then be arrested for being seen on video leaving your own house with a mask on while sick with COVID, simply trying to protect your neighbors from germs. Now imagine what this same thought experiment might feel like for one of your constituents who is undocumented, or who has dark skin and is therefore more vulnerable to being wrongly accused when facial recognition software is used. So many of your neighbors are much more vulnerable than you are, and you are putting them at risk if you allow surveillance cameras onto their porches and their driveways. Please, do not allow this technology into my neighborhood! |  |
|  | My concerns are MANY. Violation of privacy, potential infringement of citizens' constitutional rights, weaponization of footage by an increasingly fascist federal government, increasing racial disparities in policing, and so many other harms are very likely to occur if this proceeds! I live near Garfield Highschool. Why must I be surveilled while just going about my daily life? When I visited China, I expected surveillance by the repressive communist regime there, and i thought about how grateful I was to live in the US, where a democratic government would never allow such blatant violation of citizens' privacy! How deeply embarrassing and upsetting that I was so very wrong. I do not support the use of these cameras in my neighborhood, and I definitely do not support expanding them to cover more and more of our city! | Absolutely none. Any supposed value for "fighting crime" just actually wastes more taxpayer money incarcerating people who in fact need housing. The need for fighting crime in our city could be made obsolete by funding affordable housing, addiction treatment services, and other solutions to the root causes of most crime. | This technology is absolutely reprehensible and should not be allowed in our city! | Your constituents do not want this!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |

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| 1<br>2<br>1 | Do not want to give information to Ice. I don't trust them. Don't know who they are especially when they are masked. Could be some of the people that Trump pardoned because they are all criminals.                          | The public needs to be protected from use of this technology.                                                  | None                                                                                                                                                                             |                                                                                                                                                                                      |
| 1<br>2<br>2 | CCTV cameras will further erode trust in the police system among people that live in those areas. Constantly feeling watched will stifle expression.                                                                          |                                                                                                                |                                                                                                                                                                                  | Whether increasing surveillance in public areas actually reduces crime, and is that reduction significant enough to offset the psychological impact on people living in those areas. |
| 1<br>2<br>3 | Vote against CCTV expansion as long as Trump is in office and ICE acts like this is a police state                                                                                                                            | No RTCC expansion as long as Trump is in office and ICE and Homeland Security act like this is a police state. | In general it can have value but we must be very careful about privacy issues.                                                                                                   | No<br><br>How our privacy has already been stolen by the Trump administration and DOGE.                                                                                              |
| 1<br>2<br>4 | An AI dystopia is what these technologies all seek to create -- CONTROL is an illusion, and a toxic one for governing bodies to try to enforce on the people who pay to create it. I don't want to live in a dystopian world. | I'm certain the hope is that AI can begin to replace people and policing -- NO, just NO.                       | Stop the push toward criminalizing the human responses to economic systems that seek to monetize us to death! Capitalism is killing us, and who is trying to put on the brakes?? | We're not crazy because we don't want to be controlled. I'm law abiding and I don't want it.                                                                                         |

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We should absolutely not subject the public to this type of surveillance technology, especially at a time when the Trump administration is ignoring court orders and guardrails that would protect the public from inappropriate use of this technology by ICE or other government officials who are disregarding the constitution in front of our eyes.

SPD is an untrustworthy partner, and has repeatedly broken the public trust.

Whether it's the DOJ consent decree from the Obama administration (with some aspects still in place), or their demonstrated excesses use of force during the 2020 George Floyd protests which resulted in payouts of tens of millions of dollars, the public does not and should not trust the SPD as a good faith partner to use this technology without racially profiling, or invasive surveillance

The use of this technology is a waste of resources that could be utilized to benefit public safety. Public safety would be greatly enhanced by providing safe and affordable housing, access to food and free mental health resources. Give us service not surveillance.

Take this political moment seriously!

The Trump administration and ICE may gain access to this technology illegally, as the federal government has committed to sending a more militarized police presence to Seattle. With the blatant disregard of court orders and the constitution, our city should not be developing this technology that can so easily fall into the wrong hands at this time.

SPD has a proven track record of being an untrustworthy partner. The people of Seattle do not trust this technology in the hands of SPD.

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| <p>I believe that the federal government will seek any existing tool to harm immigrants, their political opponents, and people seeking abortion and gender care. I am DEEPLY concerned about furthering the ability of this administration to target vulnerable and oppressed communities.</p> | <p>Any value it could potentially have must be evaluated against the harm it will cause. And I believe it will be weaponized against our most vulnerable communities.</p> | <p>I want leadership to consider what is currently happening in our country, and the way that ICE is kidnapping people, ripping apart families, and terrorizing immigrants and black and brown people. This administration is aggressively attacking the rights of trans people and queer people. It is working to further erode reproductive rights. It is sending the Marines and National Guard to suppress peaceful protest against the wish of state leaders. There are legitimate claims of the US being on the brink of becoming a dictatorship. This is NOT the time in history to increase surveillance.</p> | <p>I beg you all to protect the people of Seattle by NOT implementing this.</p> |
| <p>Surveillance creates fear. Privacy is a fundamental right. CCTV is an incursion into innocent peoples lives. Don't extend it.</p>                                                                                                                                                           |                                                                                                                                                                           | <p>I don't want it.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                 |
| <p>I'm very concerned that information from our license plates will be uploaded to a national database, which will be available to ICE, Border Control, etc..... This will endanger many in our marginalized communities (e.g., immigrants, trans folks, women). Is it not illegal in</p>      | <p>I understand that this technology will add another tool in your 'tool belt' to fight</p>                                                                               | <p>Please consider the importance in these rife times of maintaining our status as a sanctuary state and city.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                 |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|             | Washington State for the police to cooperate with immigration enforcement? This seems to be a back door way to do so.                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                           | crime.<br>However, the risks of joint a national surveillance system far outweigh the benefits.                  |                                                                                                                                                     |
| 1<br>3<br>0 | I'm extremely concerned with the proposal to expand the use of CCTV cameras used by SPD. Citizens have a right to privacy and being constantly surveilled will grow tensions between the public and SPD. Federal departments such as ICE have already used CCTV footage in other states to track and detain immigrants, and I believe that it is the city's responsibility to maintain itself as a sanctuary city and not allow for this expansion.                                | The increase in surveillance will no doubt lead to a disproportionate amount of arrests of marginalized groups in Seattle | none                                                                                                             | Consider divesting funds from SPD to use for essential services such as housing and public schools.                                                 |
| 1<br>3<br>1 | 100% surveillance 24/7 does not make for a free society. "1984" was a cautionary tale, not a manual for how to govern a society. Increased CCTV does not keep citizens more safe, it just makes us less free.                                                                                                                                                                                                                                                                      |                                                                                                                           |                                                                                                                  | Lead from your ideals, not your fears. Standing up to fascism and for true freedom is the most important work of our elected leaders at the moment. |
| 1<br>3<br>2 | Major concerns. Mass surveillance, especially if the data gets into the hands of unaccountable and lawless government actors, is the antithesis to a free and democratic society. Right now the federal government is outright violating court orders and threatening to send citizens to overseas prisons without due process. These cameras will help facilitate the human rights abuses of innocent individuals and people who should have a day in court to defend themselves. | I think the risk far outweighs the value.                                                                                 | The City of Seattle leadership should think about how to protect its citizens from federal government overreach. | Why is the U-District not listed as a neighborhood? It has nearly as many residents as Capitol Hill.                                                |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

I am concerned about the threat that this expansion of CCTV use will pose to civil liberties, without any accompanying improvement in crime clearance rates. CCTV networks using cloud-based storage have been abused by ICE seeking to search national databases of CCTV footage, including in our sanctuary city (<https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>), police forces in states that have criminalized abortion, and lawful protests.

I would strongly urge City leadership to think carefully about the unintended consequences of enabling increased surveillance for our most vulnerable community members and for citizens exercising their First Amendment protest rights.

This represents a further move to surveillance and dictatorship. It jeopardizes our freedom and does not offer protection.

With the lack of oversight and tracking, the potential for overreach overrides potential benefit. Research does not support that increased use of technology in this manner meaningfully reduces crime while raising many questions regarding safeguarding our rights. [https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1275&context=jj\\_pubs](https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1275&context=jj_pubs)

With the current administration's tenuous connection to abiding to due process and abject overreach in ICE's mandate to meet numerical goals (vs just focusing on criminals), the use of technology is concerning given reports of ICE obtaining this information .

Right now, none.

First, use data! Be smarter. Second, must have robust oversight. Third, must have results tracking that has integrity and that is regularly shared with the public. Forth, clear evaluation of costs and benefits vs other proven methods for reducing crime by community investments, diversion programs, and the like.

In a time of gestapo kidnappings, don't further build the infrastructure for techno-fascism

Imagine

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

1 Expanding the surveillance  
3 capabilities of the city will  
8 only endanger its inhabitants,  
and will very likely be  
leveraged by state actors and  
agencies (i.e. ICE) to target  
immigrants and other  
vulnerable populations.  
Please do not move forward  
with this.

Please consider  
the harm you will  
be inflicting on  
some of our most  
vulnerable. This  
harm vastly  
outweighs any  
good these  
systems may do.

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| 1<br>3<br>9 | <p>CCTV poses a threat to civil liberties Police had used camera networks to spy on “immigration protests” There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. And, cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.</p> | <p>CCTV will NOT reduce violent crime or aid in police investigations. The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigator y benefits of CCTV has yet to develop.”</p> | <p>None whatsoever.</p> | <p>DO NOT DO SPEND TAXPAYER DOLLARS ON THIS TECHNOLOGY.</p> | <p>Stop. Full stop.</p> | <p>There are MANY effective tools the city could use to decrease community violence. Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. These programs save money, research has shown every \$1 invested saves \$33.</p> |
| 1<br>4<br>0 | <p>I do not want this to be used against the people</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>No need for increased surveillance</p>                                                                                                                                                                                                                                                                                        | <p>None</p>             | <p>Not to be used against the people</p>                    | <p>N/a</p>              | <p>N/a</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>I disagree with the digital surveillance methods because they create a mass amount of data about citizens that can be misused. Technology fails, horrible things could happen to someone on accident because the tech is inaccurate. Even more, I do not wish to live in a surveillance state where my moves as a member of the public are consistently tracked and entered into some database that I could never get into. It is an unnecessary waste of resources that could go into something more useful for citizens daily lives, like sidewalks, parks, or more transit connections.</p> | <p>I do not see any value in a stockpile of data over people that can be hijacked, misused to target individual s without due process, or generally using city resources for some unseen benefit to the people it is affecting.</p> | <p>Technology is not without the bias of people who have access to it. Implementing this sort of system will ultimately affect people who have less access to private space, such as our unhoused neighbors, and it is our responsibility to treat all those we share a city with as equal inhabitants.</p> |
| <p>Expanding this has been shown ineffective in stopping violent crimes. It does, however, pose a threat to civil liberties. There is also evidence that the police will not use CCTV footage judicially - posing the camera away from their own crimes. I do not support SPD providing anymore information to ICE about our neighbors, who are being disappeared from our cities.</p>                                                                                                                                                                                                            | <p>I do not think we should live in a world of constant surveillance. Giving more to the police is not ideal.</p>                                                                                                                   | <p>Think about our large immigrant population and how damaging this could be. They are here legally, paying taxes, supporting our local economy. We do not want them disappeared with the help of SPD.</p>                                                                                                  |
| <p>Please carefully consider any unintended negative consequences of adding cameras to selected communities. Evidence indicates that CCTV poses a threat to civil liberties at a time when these liberties are threatened. If so - now is not the time to make this change!</p> <p>Loss of transparency from SPD<br/>Lack of training in how to use this new technology</p>                                                                                                                                                                                                                       | <p>This technology could help in solving a crime but hopefully not using a crime to</p>                                                                                                                                             |                                                                                                                                                                                                                                                                                                             |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

solve a  
crime !

Three weeks is NOT sufficient for a pilot program for any program, especially something obtaining sensitive data. These data will end up being used by bad actors, misaligned with Seattle's public opinion and politics.

Specific concerns include allowing bounty hunters and ICE agents to track immigrants, abortion seekers, and likely seekers of gender affirming care, or anyone else targeted by our currently hard right, fascism-inclined federal government.

The value is to the current federal government's non-democratic intentions. While it may have some small use in local traffic safety, the risk to privacy far outweighs this.

As a fifth generation Washington resident, all proud Republicans, whose ancestors came here on the preacher train in the late 1800s, I feel I can speak for many when I say that this program is not aligned even with the majority opinion among right wing folks here. We want our privacy, and we value it for others. Do not let the heat of today's political climate invade the needs of our state and the will of its majority - left and right alike - specially in Seattle, where we are a sanctuary city for a reason (the voting public has already extensively spoken on this issue).

1  
4 I object to a surveillance state  
6

None

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

1 I have significant concerns  
4 about this technology and  
7 strongly condemn its usage.  
We already have proof of SPD  
collaborating with ICE- there  
is no reason why this  
collaboration won't continue.  
This is in direct contradiction  
to Seattle's purported status  
as a sanctuary city and only  
makes the current rise in  
kidnappings even worse.

Time and again I have  
commented that CCTV does  
nothing to prevent crime. All  
it does is increase  
surveillance. With the new  
Trump administration this is  
only made worse.

None.  
Nobody in  
the city  
wants this  
and we  
see your  
shady  
attempts  
to expand  
CCTV  
behind  
our backs.

Consider the rise  
in kidnappings  
that we've already  
seen. Consider the  
decades of  
research that  
CCTV does  
nothing to reduce  
crime.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>CCTV will NOT reduce violent crime or aid in police investigations. The only study SPD cites – a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.” A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer. A study of Dallas, TX found “[CCTV] cameras are likely not cost-effective in terms of increasing clearances” due to any increases in clearance rates being mostly limited to thefts. Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved. No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates. Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV. Justice Department experiments have found “[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels. Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors.”</p> <p>CCTV poses a threat to civil liberties. Police have used camera networks to spy on “immigration protests.” There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. And, cloud-based CCTV storage means ICE is able to search nationwide databases</p> | <p>These cameras will target the LGBTQIA+ community , immigrants , and BIPOC Youth, the same people the Trump Administration is targeting. SPD asked for this expansion 3 weeks after their CCTV and RTCC cameras went live on May 20, 2025 showing SPD never intended for this surveillance to be a short-term “pilot.” SPD confirmed to Guy Oron that they have been providing “mutual aid” to ICE/Department of Homeland Security. Some of this “mutual aid” occurred while Interim Police Chief Shon Barnes was making the headline grabbing claim that he expects to go to jail because he won’t</p> | <p>None. I see no value in use of this technology.</p> | <p>The Community Surveillance Working Group (CSWG)'s report on Closed Caption Television (CCTV) cameras and Real-Time Crime Center (RTCC) stated that “[a] majority of the working group is unsupportive of any pilot deployment of these two technologies [CCTV and RTCC]” due to “[t]he amount and urgency of the concerns and outstanding questions.” The CSWG’s role is to “[p]rovide to the Executive and the City Council a privacy and civil liberties impact assessment for each departmental request for surveillance technology acquisition or in-use approval.” City leadership should not ignore the recommendations of the group responsible for assessing privacy, civil rights, and disparate impacts recommend for CCTV &amp; RTCC.</p> | <p>There are MANY effective tools the city could use to decrease community violence. Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. These programs save money, research has shown every \$1 invested saves \$33. Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime. Both violent crime and property crime can be reduced by community</p> |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

of CCTV footage including footage from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority. A cop in Texas has used a database of CCTV footage to search for someone that had an abortion. The cop was able to search CCTV footage from Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare. SPD officer abused surveillance to stalk a “hot” SPD employee. The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...” The University of Hull study also found “The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for ‘no obvious reason’ and on the basis of categorical suspicion alone.” In Washington, DC a police lieutenant was caught using police surveillance technology to blackmail gay men. CCTV camera operators have been caught using the cameras to spy on people. CCTV cameras open the door to expanding Automated License Plate Readers (ALPRs), facial recognition, and a host of algorithms that “examine” how people are walking to determine if they’re suspicious. People’s brains act in a manner similar to “psychosis and social anxiety disorder” when they know they are being surveilled.

Police control CCTV camera, the cameras see what the police want them to see Cameras have been caught panning away from police

cooperate with the Trump Administration. SPD and Mayor Harrell refuse to respond to questions from Hard Pressed about how many times ICE has asked for data sharing. SPD’s claim that it is following the Keep Washington Working Act & Washington Shield Law is dubious. Standing up to Trump means not expanding surveillance !

investments. Investments restoring vacant land, the presence of street lighting, increasing public transportation, and community non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes. Maintaining green spaces has been proven to reduce violence. Green spaces reducing violence has been extensively researched. Many communities across the country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community. Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities, and access to affordable housing. Poverty and income inequality are associated with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence. Opening libraries and expanding library hours both reduce violence and property crimes. Increasing access to healthcare

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

violence to avoid creating evidence of the police's actions. Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray.

decreases crime. Unfortunately, decreasing access to healthcare increases crime.

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| 1<br>4<br>9 | I am worried about my privacy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | I do not want my actions to be surveilled. | I only see innocent citizens having their privacy taken away | Most immigrants and LGBTQ+ people are hardworking people that just want to live their lives. This technology will wrongly target them. | Please do not adopt it.                                                                                                                                                          |
| 1<br>5<br>0 | <p>My concern is that CCTV does not actually reduce crime and that it puts marginalized groups at risk. A 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.” The threat to civil liberties that CCTV will have is not worth it. There’s no way to prevent cops from handing footage over to ICE which would put immigrants at further risk. Cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State. The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found “Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...” So BIPOC communities will also be put at more risk. The danger CCTV poses to these communities is not worth that zero benefits they will have since they don’t actually reduce crime.</p> |                                            |                                                              |                                                                                                                                        | <p>This technology will provide no benefit to people. What would have an actual impact on reducing crime would be to provide better social services to people who need them.</p> |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

Three weeks is not sufficient time for a pilot program. There has been no time to collect data and analyze its effectiveness.

We are currently in a huge budget shortfall. Adopting and expanding this program will add even more to Seattle's budget crisis. Green lighting this unproven program is budgetary bloat and fiscally irresponsible.

CCTVs are an unnecessary surveillance technology. I do not want to be recorded by the nanny state. These expanded areas specifically target marginalized communities (BIPOC and queer people) and unhoused people. Bring back privacy.

None.  
They do not prevent crime.

Budget: This is not sensible. If you approve this program as permanent and fund it, you say you care more about a police surveillance program than sidewalks, parks, fire fighters, schools, libraries, etc.

CCTV will not increase safety, but it will increase surveillance. It will waste funding that should go to true public safety measures like shelter beds, poverty reduction, and mental health services.

I see no value whatsoever.

We don't need flashy gadgets that have been proven to be ineffective at promoting a truly safe place for people to live. We know what increases safety: access to shelter, food, services, and education.

This would play into the Trump Administration's plans to surveil everyone and disappear political enemies. It would further degrade our civil liberties.

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| 1<br>5<br>3 | That more surveillance will lead to the further over policing of communities that have already suffered from over policing. That these recordings will be shared with ICE and other federal law enforcement that seek to target our city. And that it will lead to mistrust of the citizens of this city of their police force in a critical time where our relationship needs to be mended. This is not the way to mend that relationship. | I do not think this is the time to be instituting this technology. In fact I'm begging you to rethink this. | Please do not do this. I have lived in this city my whole life and worked in gun violence prevention work. This will not help us fight crime. This just adds to us being surveilled. Given what is happening in the world right now and the way the Federal government is ignoring and plowing over states rights and city rights I don't believe what would be captured on these recording would be secure. | This is a moment to make a good decision and not move towards more surveillance which will lead to more distrust from your citizens. |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|

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| 1<br>5<br>4 | CCTV poses a threat to our civil liberties, especially our first amendment right of free speech, public protest, and public assembly. CCTV also harms by aiding in criminalizing people seeking abortions and gender-affirming healthcare. CCTV is a threat to women and survivors of sexual assault and stalking. CCTV harms immigrants by giving information directly to ICE, directly supporting the kidnapping of immigrants with no due process. Police control of CCTV cameras leads to censorship and selective punishment. CCTV creates a system ripe for abuse and potential to violate all of our First and Fourth Amendment Rights. We should not expand CCTV! | I do not see any value in this technology. Real safety comes from community care, equitable access to resources, stable housing, food security, childcare, education, and jobs that pay a living wage. | No | I want City leadership to deeply examine the questions, "What is safety? Do I want safety for everyone?"<br><br>I want City leadership truly listen to the voices of marginalized people and those standing up for them in the community and let those voices be a guide for what safety could look like instead of increased surveillance. |
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| 1<br>5<br>5 | <p>It makes logistically possible the worst forms of authoritarianism as soon as the politics shift as they easily can and have already begun to do so, AND it makes more efficient (and thus easier and more likely) attempts to enforce bad policy that focuses on punishment rather than on compensating victims with progressive revenue and providing services to the people who make up the economic and social underclass</p> | <p>None, unless you count something for politicians to brag about and pretend to have done something good rather than what it actually is - worse than nothing</p>                                                                                                                                                                                 | <p>It's negative value because of the money wasted</p> | <p>The national politics of Immigration and Customs Enforcement gestapo deportations, the criminalization of abortion and trans healthcare, etc, AND the utter failure of carceral responses to even the crimes (safety related or not) that Seattle does have, AND the ease at which this can be hacked</p> | <p>Don't use it any of it. Remove the surveillance technology you already have.</p> | <p>It's not complicated. Just make a serious attempt at implementing progressive policy for once.</p>                                                                           |                                                                 |
| 1<br>5<br>6 | <p>Trump and people like him can use it for all sorts of ills, also it puts us further down the road to wasting police time and court resources and jail resources on things that don't work rather than the services and victim-compensation that we know do.</p>                                                                                                                                                                   | <p>It's a way to ignore the obvious and only answer. Punishment doesn't prevent crime. (Might work on white collar crime like wage theft). Ending poverty does. Progressive taxation will force the tech elite to decide whether to pay for the consequences of the problems they've caused or partially leave and stop causing those problems</p> | <p>None</p>                                            | <p>It is too easy to be abused by governments, it is too easy to be used "lawfully" but unethically to waste money traumatizing people without improving constituent's lives, and it is too easy to hack because if it exists it will eventually be hacked</p>                                               | <p>Don't</p>                                                                        | <p>Your fake performative politics will not protect you - everyone can see that Seattle's problems are not being solved. Only progressive policy will actually be effective</p> | <p>Do not waste our money on this dangerous unhelpful crap.</p> |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

1  
5  
7

This technology won't reduce  
crime and is ripe for abuse.

None

Investing in  
communities is  
the most effective  
way to decrease  
crime.

## 2025 Surveillance Impact Report Executive Overview

# Closed-Circuit Television Camera Systems

**Seattle Police Department**

## Overview

This Executive Overview documents information about the collection, use, sharing, security, and access controls for data that is gathered through Seattle Police Department's (SPD) Closed-Circuit Television Camera systems (CCTV). All information provided here is contained in the body of the full Surveillance Impact Review (SIR) document but is provided in a condensed format for easier access and consideration.

## 1.0 Technology Description

The Seattle Police Department (SPD) proposes closed-circuit television (CCTV) camera systems to deter and detect criminal activity. CCTV camera systems contribute to averting harm to individuals and property and reducing crime by assisting in collecting evidence related to serious and/or violent criminal activity as part of investigations. The CCTV camera systems are proposed to be installed at locations where gun violence, human trafficking, and persistent felony crime is concentrated. The cameras will face toward the street, sidewalk, and other public areas. Signs acknowledging use of the cameras will be posted. Privately-owned security systems will be able to share video streams of storefronts and areas where the public has access with SPD.

## 2.0 Purpose

Serious felony crimes are often concentrated at specific geographic locations in Seattle and long-time efforts to prevent these crimes have not been consistently successful. Police effectiveness is further hindered due to unprecedented patrol and investigations staffing shortages in the Seattle Police Department.

The purpose of the CCTV program is to mitigate unprecedented patrol and investigations staffing shortages by leveraging evidence-based and industry-standard technologies to deter and detect persistent felony criminal behavior, gun violence, and human trafficking at specific places where crime is concentrated. The planned deployment areas are on Aurora Avenue North, Belltown, Chinatown-International District, the Stadium District, Garfield High School, the Capitol Hill Nightlife District, and the Downtown Commercial Core.

CCTV camera systems contribute to averting harm to individuals and property and reducing crime by assisting in collecting evidence related to serious and/or violent criminal activity as part of investigations. For example, CCTVs could be used to review a firearms-related homicide to identify the suspect and provide information that would provide justice for the victims and remove deadly weapons from the street.

## 3.0 Data Collection and Use

Until data is extracted from the CCTV system's local storage, the data is temporarily stored on the device. Video may only be extracted for legitimate law enforcement purposes, as governed by [SPD Policy 12.050](#). For most CCTV systems, the recordings are kept locally for 30 days, and not retained for a longer duration unless manually extracted by authorized personnel via the video management system software. Private, 3rd party video, if used, will be subject to the 30-day retention on SPD

storage, unless used as evidence for a criminal investigation.

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense (GO) Report. Evidence is submitted to the Evidence Unit and associated with a specific GO Number and investigation.

## 4.0 Data Minimization & Retention

In order to minimize inadvertent collection of data, the CCTV cameras will only be placed to capture events in plain view in public areas where as a matter of law no reasonable expectation of privacy exists.

CCTV video recordings are automatically purged by the system after 30 days unless the footage holds evidentiary value related to criminal activity or assists in the pursuit of a criminal investigation.

Additionally, the CCTV camera systems will maintain a complete audit log of activities (including but not limited to personnel access and video extraction logs) and would be subject to an audit by the Office of Inspector General at any time.

## 5.0 Access & Security

### Access

Only authorized SPD and OIG users can access the CCTV camera feed or the data while it resides on the devices. Access to the systems/technology is limited to authorized personnel via password-protected login credentials.

Data extracted from the system/technology and entered into investigative files is securely input and used on SPD's password-protected network with access limited to authorized detectives and identified supervisory personnel.

Access to video evidence is controlled by SPD Manual Title 12 provisions governing Department Information Systems including [SPD Policy 12.040](#) - Department-Owned Computers, Devices & Software, [SPD Policy 12.050](#) - Criminal Justice Information Systems, [SPD Policy 12.080](#) – Department Records Access, Inspection & Dissemination, [SPD Policy 12.110](#) – Use of Department E-mail & Internet Systems, and [SPD Policy 12.111](#) – Use of Cloud Storage Services.

Data collected on 3<sup>rd</sup> party systems will be accessed by SPD personnel using the above guidelines, but will be owned by the 3<sup>rd</sup> party, unless taken into evidence.

### Security

The data will be encrypted at rest (where it is stored) and in transit (either through vendor encryption or through VPN on the City network side) as it's being transmitted from the camera device to the storage system, server, or cloud. Per the Washington Secretary of State's Law Enforcement Records Retention Schedule, the required records retention period for surveillance video that does not involve a specific incident is "Retain for 30 days after last recording or until determined that no security incident has occurred, whichever is sooner, then Destroy."

Audits from the Office of Inspector General or other official auditors will be allowed as needed.

## 6.0 Data Sharing and Accuracy

Data obtained from the technology may be shared outside SPD with the other agencies, entities, or individuals within legal guidelines or as required by law. Data may be shared with outside entities in connection with criminal prosecutions.

Data may be made available to requesters pursuant to the Washington Public Records Act, [Chapter 42.56 RCW](#) (“PRA”). SPD will apply applicable exemptions to the data before disclosing to a requester. Individuals have the right to inspect criminal history record information maintained by the department ([RCW 10.97.030](#), [SPD Policy 12.050](#)). Individuals can access their own information by submitting a public disclosure request.

Per [SPD Policy 12.080](#), the Crime Records Unit is responsible for receiving, recording, and responding to requests “for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies.

Discrete pieces of data collected by CCTV cameras may be shared with other law enforcement agencies in wanted bulletins, and in connection with law enforcement investigations jointly conducted with those agencies, or in response to requests from law enforcement agencies investigating criminal activity as governed by [SPD Policy 12.050](#) and [12.110](#). All requests for data from Federal Immigration and Customs Enforcement (ICE) authorities are referred to the Mayor’s Office Legal Counsel in accordance with the Mayoral Directive, dated February 6, 2018.

SPD shares data with authorized researchers pursuant to properly execute research and confidentiality agreements as provide by [SPD Policy 12.055](#). This sharing may include discrete pieces of data related to specific investigative files collected by the devices.

## 7.0 Equity Concerns

The mission of the Seattle Police Department is to prevent crime, enforce the law, and support quality public safety by delivering respectful, professional, and dependable police services. SPD Policy 5.140 forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior and other accountability measures. The pilot portion of the program will be data-informed and guided. It will terminate if data suggests the technology is ineffective. Utilizing the abilities of the Performance Analytics and Research Unit, the Seattle Police Department has a plan to actively manage performance measures reflecting the “total cost of ownership of public safety,” Equity, Accountability, and Quality (“EAQ”), which includes measures of disparate impact and over policing. In addition to a robust Continuous Intervention Assessment designed to inform, in real-time, the active development of a safer and more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures just right policing is achieved with undue collateral harm.

It's worth noting that many factors can contribute to disparate impacts in policing, most of which occur early in a person’s life, long before there is engagement with the police. For example, systems and policies that perpetuate poverty, the failure to provide children with the strong and fair start they deserve in the crucial birth-to-five years, inadequate public education, and a lack of economic

opportunity can all contribute to disparate outcomes. In addition, family dynamics and peer pressure can also create negative outcomes. We recognize these factors and strive to do our part to mitigate them, but we can't expect our police officers by themselves to cure these contributory factors. However, we do expect our officers to do their jobs respectfully and fairly as they interact with community members.

These technologies are location-specific, with a place-based focus, meaning they will record people who choose to be in a public place where the technologies are being used. This mitigating factor reduces, to an extent, the possible disparate impact of potential police actions.

## **SUMMARY and FISCAL NOTE**

| <b>Department:</b>        | <b>Dept. Contact:</b> | <b>CBO Contact:</b> |
|---------------------------|-----------------------|---------------------|
| Seattle Police Department | Nick Zajchowski       | Geoffrey Detweiler  |

### **1. BILL SUMMARY**

**Legislation Title:**

AN ORDINANCE relating to surveillance technology implementation; authorizing approval of uses and accepting the 2025 updated surveillance impact report and 2025 executive overview for the Seattle Police Department's use of Closed-Circuit Television Camera Systems.

**Summary and Background of the Legislation:** The original Surveillance Impact Report (SIR) for Closed-Circuit Television Camera Systems (Ordinance 127110) was adopted by the City Council on October 8, 2024. Subsection 14.18.020.F of the Seattle Municipal Code (SMC) states that "[a]ny material update to an SIR, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance."

The CCTV pilot deployment areas authorized in the 2024 SIR were Aurora Avenue North, Belltown, and the Downtown Commercial Core. The material update adds the Stadium District, Garfield High School, and the Capitol Hill Nightlife District to the list of eligible CCTV deployment areas and clarifies the retention policy to 30 days after date of recording, or until determined that no security incident has occurred before being deleted.

### **2. CAPITAL IMPROVEMENT PROGRAM**

Does this legislation create, fund, or amend a CIP Project? ☐ Yes ☒ No

### **3. SUMMARY OF FINANCIAL IMPLICATIONS**

Does this legislation have financial impacts to the City? ☒ Yes ☐ No

#### **3.d. Other Impacts**

**Does the legislation have other financial impacts to The City of Seattle, including direct or indirect, one-time or ongoing costs, that are not included in Sections 3.a through 3.c? If so, please describe these financial impacts.**

SPD was budgeted at \$1.7 million for the Technology Assisted Crime Prevention Pilot project to implement Automated License Plate Readers (ALPR), Real-Time Crime Center (RTCC), and Closed-Circuit Television Camera Systems (CCTV). The pilot locations for RTCC and CCTV are in the Chinatown-International District, Downtown Core, and Aurora Avenue North from 93rd to 130th. An additional \$200,000 was added by the City Council to expand the Aurora

Avenue North installation southward to 85th and northward to 145<sup>th</sup> street. The annual maintenance and licensing costs are \$40,000 for the pilot locations. An additional \$425,000 is included in the 2025 budget to expand CCTV to the additional Garfield High School location. The 2026 FIFA World Cup budget proposal includes a \$200,000 budget request to expand CCTV to the Stadium District location. The proposed Capitol Hill Nightlife District CCTV expansion does not have funding currently identified, but preliminary cost estimates are \$400,000 one-time and \$35,000 for annual maintenance and licensing. The annual maintenance and licensing costs are \$40,000 for the Garfield High School location and \$20,000 for the Stadium District location. The use of CCTV may help mitigate SPD's shortage of sworn staffing by more effectively deploying patrol resources to incidents and follow-up investigations. However, use of the CCTV and the other related technologies being assessed does not necessarily correlate to direct cost savings.

**If the legislation has costs, but they can be absorbed within existing operations, please describe how those costs can be absorbed. The description should clearly describe if the absorbed costs are achievable because the department had excess resources within their existing budget or if by absorbing these costs the department is deprioritizing other work that would have used these resources.**

**Please describe any financial costs or other impacts of *not* implementing the legislation.**

There are expected to be impacts in the form of efficiencies in deploying patrol officers and assisting with investigations. These impacts will be explored as part of the planned evaluation of the pilot.

**Please describe how this legislation may affect any City departments other than the originating department.**

N/A

#### **4. OTHER IMPLICATIONS**

- a. Is a public hearing required for this legislation?**  
No.
- b. Is publication of notice with The Daily Journal of Commerce and/or The Seattle Times required for this legislation?**  
No.
- c. Does this legislation affect a piece of property?**  
No.
- d. Please describe any perceived implication for the principles of the Race and Social Justice Initiative.**

- i. **How does this legislation impact vulnerable or historically disadvantaged communities? How did you arrive at this conclusion? In your response please consider impacts within City government (employees, internal programs) as well as in the broader community.**

The original 2024 Surveillance Impact Report as required by the Surveillance Ordinance includes a Racial Equity Toolkit.

- ii. **Please attach any Racial Equity Toolkits or other racial equity analyses in the development and/or assessment of the legislation.**

N/A

- iii. **What is the Language Access Plan for any communications to the public?**

The SIR documents were translated into the recommend languages and were posted online.

**e. Climate Change Implications**

- i. **Emissions: How is this legislation likely to increase or decrease carbon emissions in a material way? Please attach any studies or other materials that were used to inform this response.**

No.

- ii. **Resiliency: Will the action(s) proposed by this legislation increase or decrease Seattle's resiliency (or ability to adapt) to climate change in a material way? If so, explain. If it is likely to decrease resiliency in a material way, describe what will or could be done to mitigate the effects.**

No.

- f. **If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s)? What mechanisms will be used to measure progress towards meeting those goals?**

The pilot will be evaluated under a Continuous Impact Assessment framework. Outside academic subject matter experts will be retained to design and manage an evaluation plan with an assessment at the end of one year and another at the end of year two.

- g. **Does this legislation create a non-utility CIP project that involves a shared financial commitment with a non-City partner agency or organization?**

No.

## 5. ATTACHMENTS

**Summary Attachments:** None.

July 29, 2025

## MEMORANDUM

**To:** Public Safety Committee  
**From:** Greg Doss, Analyst  
**Subject:** Expanding the use of Seattle Police Department (SPD) Closed-Circuit Television cameras (CCTV) and adding new capabilities to the SPD Real-Time Crime Center (RTCC)

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On July 31, 2025, the Public Safety Committee will discuss two executive drafted ordinances that would expand SPD's use of existing surveillance technologies:

- TMP-11624 would authorize SPD to install and use CCTV cameras in three new/additional locations at Capitol Hill, the Stadium District, and areas near Garfield High (see Attachment 1); and
- TMP-11625 would authorize SPD to access and continuously record Seattle Department of Transportation (SDOT) traffic management camera footage at the RTCC (see Attachment 2).

SPD and Executive staff will give a presentation on the planned expansion of these systems, which the City Council authorized last year as a pilot project, and which are subject to an evaluation that will provide phased results in 2026 and 2027.

Though presented in separate pieces of legislation, the underlying technologies and policy considerations will be discussed together in this memo due to the integrated nature of the technologies as elements of the Executive's [Technology Assisted Crime Prevention Pilot Project](#) (TACPP).

### Background

The City's Surveillance Ordinance ([ORD 125376](#)), requires that the City Council approve by ordinance any material updates to the data and privacy protection policies that govern the CCTV and RTCC systems. These policies are outlined in documents called Surveillance Impact Reports (SIRs), which were reviewed and approved by the Council in October 2024:

- [ORD 127110](#) approved use of CCTV, and the associated SIR policies, for three pilot areas: (1) Aurora Ave N 85th to 145th, (2) Downtown Core and Belltown, and (3) Chinatown / International District; and
- [ORD 127111](#) approved use of the RTCC, and the associated SIR policies, to integrate dispatch, camera, officer location, 911 calls, records management systems, and other information into a "single view" to alert RTCC staff to a serious criminal event, see multiple streams of information overlaid on a map view, and convey information to officers responding in the field.

A 2024 Central Staff Memo (see Attachment 3) describes in detail the CCTV and RTCC systems, their intended use by SPD, as well as the data protection and privacy policies outlined in the SIRs for these systems.<sup>1</sup> The memo provides an in-depth analysis of potential civil liberties impacts, potential disparate impacts on historically targeted communities and vulnerable populations, and the public engagement process used to solicit feedback on the technologies.

When reviewing the proposed ordinances in 2024, the Council passed several amendments that placed additional restrictions on the technologies. Following is a summary of the amendments:

- A requirement that SPD provide at the end of 2025 and at the end of 2026 a report on the evaluation assessments that will be conducted as detailed in the SIRs,
- A requirement to include in the evaluation of the TACPP a study reporting on the appropriateness, feasibility, and cost of additional potential future CCTV deployments, to include an examination of the Alki and Harbor Avenue areas of West Seattle,
- A requirement that SPD provide to the Public Safety Committee notification that the department will integrate private camera footage into its RTCC, and identification of policies that would govern the use of such systems,
- A requirement that SPD report to the Public Safety Committee, by December 31 of each year, beginning in 2025, information about any subpoenas, warrants, and public disclosure requests for CCTV data,
- A requirement that SPD not disclose CCTV data in response to a records request made under the Public Records Act (chapter 42.56 RCW), or otherwise publicly disclose CCTV data, in a manner inconsistent with SPD protocols governing redactions, including protections for victims of crime, minors, and health care facilities, and
- A request that SPD include in any contract with a vendor for RTCC and CCTV: (1) a requirement that the vendor immediately notify SPD if the vendor receives a warrant or subpoena seeking SPD RTCC data for any purpose, including purposes related to reproductive healthcare or gender-affirming medical services; and (2) a requirement that the vendor retain legal counsel to challenge any such warrant or subpoena and advise of outcome or existence of warrant after expiration.

### **TMP-11624 and TMP-11625**

**TMP-11624** would approve and accept the material updates to the CCTV SIR and Executive Overview. The initial CCTV pilot deployment areas are Aurora Avenue North, Belltown and the Downtown Commercial Core, and the Chinatown-International District. The material update adds the Stadium District, the area around Garfield High School, and the Capitol Hill Nightlife District to the list of eligible CCTV deployment areas. It clarifies that CCTV video recordings are automatically purged by the system up to 30 days after the date of recording, or until determined that all evidence material to an incident under investigation has been transferred to secure storage.

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<sup>1</sup> See [2024 RTCC Surveillance Impact Report](#) and [2024 CCTV Surveillance Impact Report](#)

**TMP-11625** would approve and accept the material updates to the RTCC SIR and Executive Overview. The material update will provide SPD with the ability to view at the RTCC live feed from SDOT traffic management cameras.<sup>2</sup> When utilized with the RTCC software, the feed from the SDOT cameras will allow SPD to track vehicles and subjects who are suspected of being involved in criminal activity. The SDOT cameras will be recorded in the same manner as the department's TACPP crime cameras.

The data retention and privacy policies in the updated SIRs have not changed since their adoption by the Council in 2024. The revised SIRs add the new CCTV locations, traffic management camera functionality, and better synch the 30-day retention policy with the state retention policy by adding language that requires deletion of video "up to" 30 days or discovery of video with evidentiary value.

### **Status of Approved Pilot Project**

SPD's Budget includes funding for 12 RTCC Analysts in 2025 and nine additional Analysts in 2026. SPD reports that it has hired 12 analysts, eight of whom are currently staffing the RTCC for up to 20 hours per day, and four of whom are still being backgrounded before they may begin work. Analysts are supporting ongoing investigations by pushing video and incident data directly to patrol units and detectives. Analysts can also provide live updates and still images of suspects, a capability SPD says helps support its "precision policing" model.<sup>3</sup> Since the RTCC went live last May, Analysts have assisted patrol officers during real-time events and assisted investigations for active cases. SPD reports that officers have made over 75 arrests in incidents where the RTCC was used.

SPD's 2025 Adopted Budget includes funding for deployment of CCTV in the initial pilot areas (see below), as well as an expansion of cameras on the Aurora Corridor and into the areas surrounding Garfield High School. More information on the costs of all of the proposed sites can be found below.

SPD staff have reported that it will deploy into the initial pilot areas a total of 65 cameras and that all but 16 are currently active. SPD reports that the cameras are already providing the RTCC with significant coverage and allowing analysts to support investigative work and patrol calls for service. Camera status by initial pilot area as of July 6, 2025:

1. Chinatown / International District: 16 out of 20 cameras installed
2. Aurora Ave. N: 10 out of 16
3. Downtown Core: 25 out of 29

More information about current CCTV locations and policy can be found at the [City's CCTV website](#).

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<sup>2</sup> SDOT traffic management cameras are located along major arterials and select intersections. These cameras are different from City-operated traffic enforcement cameras, such as red-light cameras and school zone speed cameras.

<sup>3</sup> [GeekWire](#), 'It's a game-changer': Seattle touts high-tech Real Time Crime Center amid privacy concerns, July 15, 2025

## **Evaluation of Pilot Project**

The abstract sections of each SIR indicate that the CCTV and RTCC programs are designed to be a pilot project, with independent researchers conducting an outcome evaluation to be completed two years after implementation. Depending on the outcome of the evaluation, the pilot project may be either discontinued or continued.

To fulfill the evaluation requirements specified in the SIRs, the City's Office of Inspector General for Public Safety (OIG) is in the process of hiring independent academic experts to evaluate the RTCC and the Police Department's use of the RTCC, CCTV cameras, and Automated License Plate Readers. The evaluation team will be led by Principal Investigator Anthony Braga and Co-Principal Investigator Lisa Barao at the University of Pennsylvania's (UPenn) Crime and Justice Policy Lab.

OIG staff have indicated that SPD and UPenn researchers are developing a data collection tool and outlining the terms of the evaluation, which are expected to be included in a \$300,000 contract that will be signed in the upcoming weeks. The department expects that it will be able to provide a process report on the method being used to assess CCTV and RTCC effectiveness, as well as a potential delivery date for the outcome evaluation, to the Council in late 2025.

## **System Expansion**

The Executive has stated that the Garfield HS and Capitol Hill areas will receive cameras to address pressing public safety needs, including emergent gun violence occurring in the nightlife district and around Garfield High School. Cameras will be deployed in the City's Stadium District to provide security to residents and visitors who will attend the FIFA World Cup games in the spring of 2026.

The Mayor has said that Seattle needs every appropriate tool that's available to reduce gun violence and other felony crimes, address human trafficking, and respond to areas where crime is concentrated. The Executive does not believe that the forthcoming evaluation should be a barrier to effectively using approved technology to meet the program's goals, including the use of additional cameras.

Regarding the addition of SDOT traffic camera feed to the RTCC, the Executive notes that the city is seeking a live-view functionality that is already accessible to the public, and that private entities are currently recording SDOT streams and selling them publicly online. SPD could also view and record the camera feed, but the surveillance ordinance requires approval from the Council before doing so.

## **Public Review of Proposed Material Updates**

The City's Surveillance Ordinance requires that the initial draft of a SIR for a new technology be released for public review and comment. During this time, one or more public meetings will take place to solicit feedback. Additionally, the SIR for a new technology is reviewed by the Surveillance Advisory Working Group, which will complete a Civil Liberties and Privacy Assessment that is submitted to Council. The original SIRs for CCTV and RTCC underwent this process last year. More information can be found in the 2024 Central Staff Memo.

The Surveillance Ordinance does not require the same kind of review for material updates to adopted SIRs. The updated SIR documents attached to TMP-11624 and TMP-11625 were made available for public comment on the Seattle IT Surveillance website from June 3, 2025, to June 23, 2025. The comments can be found in Appendix B of the SIR documents in Attachments 1 and 2 to this memo. The Redlined copies of the material updates can be found at [Seattle IT's Surveillance Website](#).

The Executive has indicated that its public engagement efforts included conversations between the Garfield-Nova neighborhood and the Seattle Public Schools, discussions between SPD, the stadiums, and area businesses, and a briefing given at recent SODO and Pioneer Square Businesses Improvement District meetings. Camera installations for the Capitol Hill nightlife area were discussed at a community forum and through individual meetings with business leaders.

### **Fiscal Impacts**

Last year, SPD received an appropriation of \$1.7 million for the TACPP, which covered initial equipment purchases and installation of Automated License Plate Readers (ALPR) in all SPD vehicles, CCTV in the initial three pilot neighborhoods, and software to run the systems at the RTCC. Most of this funding has been spent in 2025 and will be covered through a reappropriation of funding through the City's 2024-2025 Carry-Forward Ordinance, which will receive its first hearing in the Finance, Native Communities & Tribal Governments Committee on July 30, 2025.

Annual maintenance and licensing costs are \$40,000 for the three initial CCTV pilot locations and \$330,000 for the RTCC, all of which are currently funded in SPD's 2025 Adopted Budget. The Council added to the 2025 Adopted budget \$425,000 in funding to cover the potential expansion of CCTV to the Garfield High School neighborhood, and \$200,000 for additional cameras at the Aurora Ave. pilot site.

The Executive plans to request \$200,000 in funding for the Stadium District CCTV cameras soon after the Council passes TMP-11624. The City allocated in the 2025-2026 Adopted Budget unrestricted cumulative reserve and Payroll Expense Tax funding to support the cameras and other infrastructure expenditures for the 2026 FIFA World Cup games. This funding will be directed to SPD in a stand-alone ordinance or as part of the 2025 Year-end Supplemental Budget Request.

The City Budget Office indicates that installation of CCTV cameras in the Capitol Hill area is expected to cost approximately \$400,000 in one-time funding and \$35,000 for annual maintenance and licensing. A funding source for these cameras has not been identified but would likely need to be a general fund appropriation in the 2026 Adopted Budget.

**Next Steps**

The Public Safety Committee will hold a second hearing and possible vote on both TMP-11624 and TMP-11625 on August 12, 2025.

**Attachments:**

1. TMP-11624 – SPD Closed-Circuit Television Camera Systems Material Update ORD (as transmitted)
2. TMP-11625 – SPD Real-Time Crime Center Material Update ORD (as transmitted)
3. 2024 Central Staff Memo on CCTV and RTCC

cc: Ben Noble, Director

## Amendment 1 to CB 121052 Material Update to CCTV Policies

**Sponsor:** Councilmember Hollingsworth

### Restrict Garfield HS Cameras to Arterial Streets

**Effect:** This amendment would restrict camera installation to arterial streets within the Garfield High School area, which is identified by boundaries listed in Section 4.3 of the Surveillance Impact Report (SIR) that is attached to the ordinance.

#### **Amend Section 1 as follows:**

Section 1. Pursuant to Ordinances 125376 and 125679, the City Council approves use of the Seattle Police Department's (SPD) use of Closed-Circuit Television Camera Systems and accepts the updated 2025 Surveillance Impact Report (SIR) for this technology, attached to this ordinance as Attachment 1, and the Executive Overview for the same technology, attached to this ordinance as Attachment 2- , provided that, within the area surrounding Garfield High School as specified in Section 4.3 of the SIR, SPD shall only install cameras on the principal arterial street of 23rd Ave, and minor arterial streets of S. Jackson St. and E. Cherry St.

## Amendment 2 to CB 121052 Material Update to CCTV Policies

**Sponsor:** Councilmember Kettle

**Author:** Councilmember Rinck

### Strengthen Evaluation Requirements

**Effect:** This amendment would require the Office of the Inspector General for Public Safety (OIG) to include in any contract with a vendor for the evaluation of the Real Time Crime Center (RTCC) and Closed-Circuit Television (CCTV) pilot projects a methodology that determines if CCTV, when used in combination with the RTCC, deters violent crime, human trafficking or persistent felony crime.

If the evaluation does not show that CCTV deters violent crime, then the Executive would need to consider, in compliance with the Surveillance Impact Report (SIR) policies, discontinuing the pilot project.

### Add a new Section 2 as follows and renumber subsequent sections:

Section 2. The Office of Inspector General for Public Safety shall include, in any contract with a vendor for the evaluation of the Real Time Crime Center (RTCC) and Closed-Circuit Television (CCTV) pilot projects, a methodology that utilizes control group areas and a quasi-experimental design to determine if CCTV, when used in combination with the RTCC, deters violent crime, human trafficking, or persistent felony crime when public notice is posted. If the evaluation does not show that CCTV deters violent crime, then the Executive shall, in compliance with the SIR policies in sections 1.1 and 2.2, consider discontinuing the pilot project.

### Amendment 3 to CB 121052 Material Update to CCTV Policies

**Sponsor:** Councilmember Kettle

**Author:** Councilmember Rinck

#### Non-disclosure Warrants

**Effect:** The Seattle Police Department (SPD) shall include in the annual report required by Ordinance 127110 whether a warrant, subpoena, or court order that includes a non-disclosure order, has been used to obtain Closed-Circuit Television Camera Systems (CCTV), Real Time Crime Center (RTCC), Automated License Plate Recognition (ALPR), or other protected data from a contracted vendor.

The report shall indicate how SPD will remedy the situation, including steps that might be taken to discontinue collecting certain data or to end the CCTV pilot program. Upon receipt of this report, the Council might consider passing an ordinance to pause or eliminate the CCTV program to prevent third parties from accessing Seattle's protected surveillance data.

#### **Add a new Section 2 as follows and renumber subsequent sections:**

Section 2. The Seattle Police Department (SPD) shall include in the annual report required by Ordinance 127110 whether a warrant, subpoena, or court order that includes a non-disclosure order, has been used to obtain Closed-Circuit Television Camera Systems (CCTV), Real Time Crime Center (RTCC), Automated License Plate Recognition (ALPR), or other protected data from a contracted vendor. The report shall indicate how SPD will prevent future disclosure of data, including steps that might be taken to discontinue collecting certain data or to end the CCTV pilot program. Upon receipt of this report, the Council might consider passing an ordinance to pause or eliminate the CCTV program to prevent third parties from accessing Seattle's protected surveillance data.



## Legislation Text

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**File #:** CB 121053, **Version:** 1

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### CITY OF SEATTLE

### ORDINANCE \_\_\_\_\_

### COUNCIL BILL \_\_\_\_\_

AN ORDINANCE relating to surveillance technology implementation; authorizing approval of uses and accepting the 2025 updated surveillance impact report and 2025 executive overview for the Seattle Police Department's use of Real-Time Crime Center software.

WHEREAS, on October 8, 2024, the City Council passed Ordinance 127111, adopting the original Surveillance Impact Report (SIR) for Real-Time Crime Center software (RTCC); and

WHEREAS, the purpose of the RTCC program provides a centralized location for real-time information and analysis-integrates dispatch, cameras, officer location, 911 calls, records management system, and other information into one single view. The software is used to alert real-time crime center staff to a serious criminal event, see multiple streams of information overlaid on a map view, and convey that information to officers who are responding in the field; and

WHEREAS, subsection 14.18.020.F of the Seattle Municipal Code (SMC), which section was enacted by Ordinance 125376 and last amended by Ordinance 125679, states that "[a]ny material update to an SIR, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance"; and

WHEREAS, the material update will provide the Seattle Police Department (SPD) the ability to view the Seattle Department of Transportation (SDOT) traffic monitoring cameras in the RTCC software; and

WHEREAS, the RTCC program went live in May 2025 and early examples of the RTCC program directly contributing to public safety outcomes include a drive-by shooting where the suspect was taken into custody, footage from a stabbing incident in the Chinatown-International District to assist investigators,

a female reporting an attempted robbery with the male suspect denying the allegations but the RTCC video footage showed the male grabbing the female's purse to disprove his story, and locating a suspect where the victim called 911 to report someone was following them with a knife; NOW, THEREFORE,

**BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:**

Section 1. Pursuant to Ordinances 125376 and 125679, the City Council approves use of the Seattle Police Department's use of Real-Time Crime Center software and accepts the updated 2025 Surveillance Impact Report (SIR) for this technology, attached to this ordinance as Attachment 1, and the Executive Overview for the same technology, attached to this ordinance as Attachment 2.

Section 2. This ordinance shall take effect as provided by Seattle Municipal Code Sections 1.04.020 and 1.04.070.

Passed by the City Council the \_\_\_\_\_ day of \_\_\_\_\_, 2025, and signed by me in open session in authentication of its passage this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
President \_\_\_\_\_ of the City Council

Approved /    returned unsigned /    vetoed this \_\_\_\_ day of \_\_\_\_\_, 2025.

Bruce A. Harrell, Mayor

Filed by me this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Scheereen Dedman, City Clerk

(Seal)

**Attachments:**

Attachment 1 - 2025 Surveillance Impact Report: Real-Time Crime Center

Attachment 2 - 2025 Surveillance Impact Report Executive Overview: Real-Time Crime Center

## 2025 Surveillance Impact Report

# Real-Time Crime Center

## Seattle Police Department

### Surveillance Impact Report Versions:

- 2024 Surveillance Impact Report: Seattle Police Department Real-Time Crime Center Software adopted by [Ordinance 127111](#) on 10/08/2024.
- 2025 Surveillance Impact Report: Seattle Police Department Real-Time Crime Center Software

## Surveillance Impact Report (“SIR”) overview

### About the Surveillance Ordinance

The Seattle City Council passed Ordinance [125376](#), also referred to as the “Surveillance Ordinance,” on September 1, 2017. SMC 14.18.020.b.1 charges the City’s executive with developing a process to identify surveillance technologies subject to the ordinance. Seattle IT, on behalf of the executive, developed and implemented a process through which a privacy and surveillance review is completed prior to the acquisition of new technologies. This requirement, and the criteria used in the review process, are documented in [Seattle IT Policy PR-02](#), the “Surveillance Policy”.

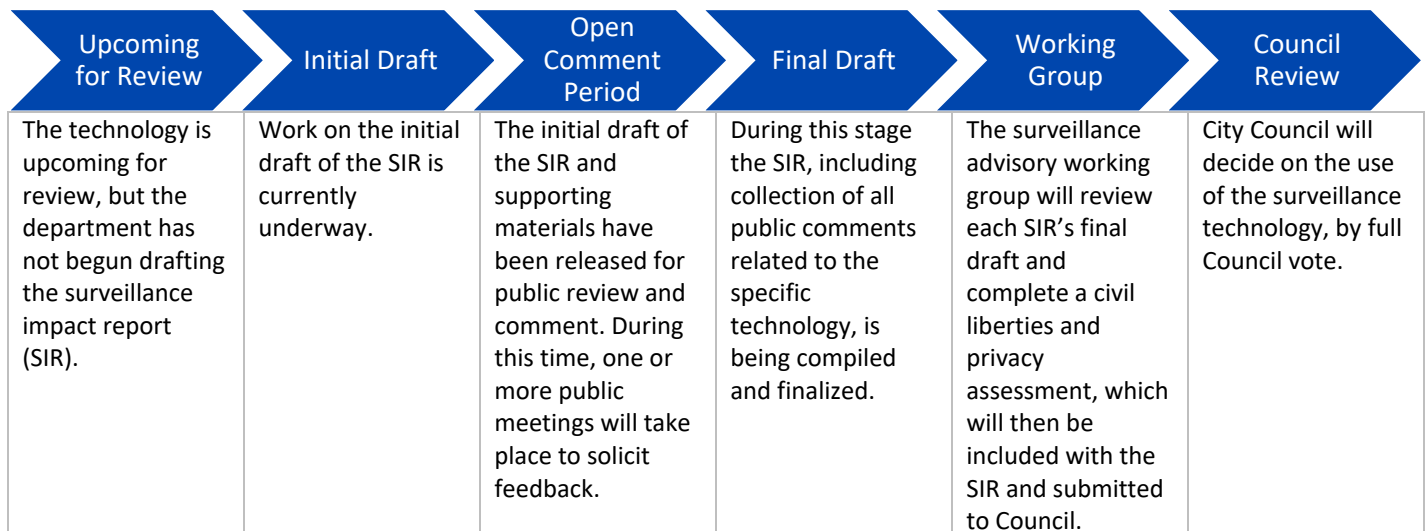
### How this Document is Completed

This document is completed by the requesting department staff, support and coordinated by the Seattle Information Technology Department (“Seattle IT”). As Seattle IT and department staff complete the document, they should keep the following in mind.

1. Responses to questions should be in the text or check boxes only; all other information (questions, descriptions, etc.) Should **not** be edited by the department staff completing this document.
2. All content in this report will be available externally to the public. With this in mind, avoid using acronyms, slang, or other terms which may not be well-known to external audiences. Additionally, responses should be written using principally non-technical language to ensure they are accessible to audiences unfamiliar with the topic.

### Surveillance Ordinance Review Process

The following is a high-level outline of the complete SIR review process.



# Privacy Impact Assessment

## Purpose

A Privacy Impact Assessment (“PIA”) is a method for collecting and documenting detailed information collected in order to conduct an in-depth privacy review of a program or project. A PIA asks questions about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. It also requests information about policies, training and documentation that govern use of the technology. The PIA responses are used to determine privacy risks associated with a project and mitigations that may reduce some or all of those risks. In the interests of transparency about data collection and management, the City of Seattle has committed to publishing all PIAs on an outward facing website for public access.

## When is a Privacy Impact Assessment Required?

A PIA may be required in two circumstances.

1. When a project, technology, or other review has been flagged as having a high privacy risk.
2. When a technology is required to complete the surveillance impact report process. This is one deliverable that comprises the report.

## 1.0 Abstract

### 1.1 Please provide a brief description (one paragraph) of the purpose and proposed use of the project/technology.

Gun violence, human trafficking, and other persistent felony crimes are concentrated at specific geographic places in the city. This concentrated crime is often anchored at these places and requires a holistic crime-prevention strategy.

The Crime Prevention Technology pilot is one component of an overall strategy of addressing felony crime at specific places. These technologies will be coupled with police patrols, continued investments in community-based initiatives, and enhanced lighting and cleaning.

The Crime Prevention Technology program is designed to be a pilot project, with independent researchers conducting an outcome evaluation to be completed two years after implementation. Depending on the outcome of the evaluation, the pilot project may be either discontinued or continued.

This SIR covers the Real-Time Crime Center (RTCC) software, one part of this pilot, and provides a centralized location for real-time information and analysis. At its core, RTCC software integrates dispatch, cameras (such as CCTV and traffic monitoring cameras), officer location, 911 calls, records management systems, and other information into one “pane of glass” (a single view). The software is used to alert RTCC staff to a serious criminal event, see multiple streams of information overlaid on a map view, and convey information to officers responding in the field.

The purpose of RTCC software is to provide situational awareness to increase officer and community safety and reactively investigate incidents. Having real-time, accurate information in one place helps increase reliability regarding the location of victims and suspects – enabling quicker aid and safer apprehension. Having better visual and spatial suspect information helps reduce unnecessary stops by officers, focusing their efforts on verified locations and accurate descriptions. RTCC also aids in investigations by aggregating multiple data sources into one location, helping provide detectives with actionable information that increases the quality of investigations and prosecutions, leading to increased accountability for criminal offenders.

## **1.2 Explain the reason the project/technology is being created or updated and why the PIA is required.**

The City's police staffing crisis, now in its fourth year, has resulted in over 700 officers leaving SPD since 2019. As of January 2024, 913 police officers are available for deployment in the city, the lowest number of in-service officers since 1991 and significantly below per-capita staffing relative to comparative jurisdictions. Low staffing levels also affect investigations, which hinders police effectiveness in solving cases and holding violent criminals accountable.

Gun violence, human trafficking, and other serious felony crimes are often concentrated at specific geographic places, and long-time efforts to prevent these crimes have not been consistently successful. Implementing technology tools to bolster policing capabilities, as one part of a holistic crime prevention and reduction plan is essential to address ongoing gun violence, vehicle theft, human trafficking, and persistent felony crime at specific places, including within our most victimized communities.

Real-time crime center software brings several technologies deemed surveillance technologies (CCTV, ALPR, etc.) into one platform. In addition, some RTCC software uses non-generative AI, such as object detection, to analyze those surveillance technologies, if enabled. As a note, SPD will not use AI facial recognition technologies. Finally, the software stores information from these technologies either in the cloud or on-premise, creating some risks around data security and retention.

Due to these factors, the City of Seattle Privacy Office has deemed the technology surveillance technology, which triggered this review.

## **2.0 Project / Technology Overview**

Provide an overview of the project or technology. The overview provides the context and background necessary to understand the purpose, mission and justification for the project / technology proposed.

### **2.1 Describe the benefits of the project/technology.**

The theory of change supporting the pilot project is that these technologies (1) bolster police effectiveness in public places where crime is concentrated when used with other crime prevention efforts, including increased police patrols, enhanced lighting, graffiti mitigation, and others (CPTED), (2) deter criminal behavior when public notice is posted, and (3) gather

evidence to hold offenders accountable. These efforts can improve public safety and enhance the public's confidence in the city government's ability to maintain safe neighborhoods.

Serious felony crimes are often concentrated at specific geographic locations in Seattle and long-time efforts to prevent these crimes have not been consistently successful. Police effectiveness is further hindered due to unprecedented patrol and investigation staffing shortages in the Seattle Police Department.

RTCC software can help mitigate staffing shortages for both patrol officers and detectives by providing more reliable and accurate data on incidents in real-time.

The benefits of the RTCC for a victim(s):

- RTCC staff can use multiple technologies (CCTV, etc.) to pinpoint the location of crimes and identify the location of victims.
- RTCC staff can assess the scene before officers responding, helping speed up the deployment of emergency aid or lifesaving assistance.

Increased investigative information helps lead to justice for victims. The benefits of RTCC technology for a community:

- Increased investigative evidence can aid in the capture and prosecution of offenders, leading to reduced violence and fewer firearms on the street. Increased evidence can also help exonerate the innocent.
- Integration with CCTV cameras, SDOT traffic cameras, and real-time crime center software can provide detectives with precise information about suspect vehicle, appearance, and location, increasing correct identification of suspects and reducing unnecessary traffic stops and adverse interactions with the public.

The benefits of RTCC technology for an officer:

- Real-time crime center software can facilitate a coordinated, precise response to suspect apprehension, increasing the safety of arrests for all involved. The technology provides a data-driven orientation to police response and staffing.

Here is one example of how SPD might use the RTCC software to more efficiently utilize separate data sources to aid victims, capture dangerous suspects, and help remove firearms from the streets:

A RTCC officer receives an alert through CAD and the RTCC software that there are gunshots on Aurora Avenue North. The software shows a map of the area on her monitor, with the associated dispatch call superimposed on the screen. Her map screen also automatically shows the feeds of the closest CCTV and SDOT traffic cameras, as well as nearby patrol car locations. She uses the RTCC software to enlarge the feed for the cameras north of the incident and sees a black Honda Civic moving at a high rate of speed in a northerly direction on Aurora.

Using the software, she quickly pulls up the camera recording where the gunshots were reported and visually ascertains that the shots were fired from a black Honda and that there is a person down on the ground. She advises over SPD radio that there is a possible gunshot victim and gives a description of the Honda and the license plate. She sees from the live camera feeds that the Honda is turning west on 125th Street, and that there is a patrol vehicle on that street 10 blocks west of Aurora and one 15 blocks south of the scene on Aurora. She advises over the radio that the suspect is heading west on 125<sup>th</sup> St. She goes back to the live camera view and surveys the shooting scene. The person is still down. No one else is at the scene. She relays via radio what she has seen through the RTCC software.

After the incident, she uses the RTCC software to create clips of all scenes showing the incident and the vehicle travel before, during and after the incident and uploads them from the RTCC software to the SPD digital evidence system.

At the same time this is happening, the officer driving north on Aurora gets dispatched to a possible shooting scene. The dispatcher informs her that there is a victim on the ground and the RTCC officer has observed no other people around the victim. The officer arrives on scene, exits her vehicle, takes a quick scan of the scene to confirm that the scene is secure. She grabs a first aid kit in her trunk, then runs to the victim on the ground and renders aid. In the background, she can hear the Fire Department sirens coming toward her. She radios dispatch and tells them the scene is secure for the arriving paramedics.

After the shooting scene is secure, a homicide detective arrives at the scene. Officers are using their flashlights and struggling to find bullet casings. The detective pulls up the RTCC application on his phone and brings up the information for the incident. He walks towards the officers and shows them the video – they move up the road a bit and eventually find the casings judging by the location of the vehicle in the video. The detective is satisfied there were no witnesses after watching the video again and proceeds with his work at the scene.

## **2.2 Provide any data or research demonstrating anticipated benefits.**

Academic research related to the effect of real-time crime centers is limited because of their fairly recent implementation; however, a [2023 John Jay College of Criminal Justice study](#) showed that a real-time crime center in Chicago, IL increased case clearance rates 5% for violent crime, 12% for property crime, and 11% for overall crime. The authors concluded that “RTCCs may provide investigative benefits to police through the integration of technologies and data, thus enhancing case solvability.”

An extensive [evaluation](#) of the Chicago Police Department’s use of a RTCC was completed by the RAND in 2019. This evaluation is meaningful because it highlighted the successes and failures of the CPD centers and made specific recommendations to increase their effectiveness.

Other studies on the effects of technologies integrated with RTCC software, such as CCTV, are discussed in their respective Surveillance Impact Reports.

SPD will evaluate the efficacy of the RTCC implementation through standard performance measures already in use: violent crime rate, priority one response time, patrol coverage when not responding to calls (over/under policing), equity, perceptions of trust, perceptions of safety. Successful implementation of this suite of technologies (CCTV/RTCC/enhanced ALPR) will be indicated by a decrease in violent crime, priority one response time, no increase or a decline in measures of police over-presence, measure of disparate impact, and an increase in perceptions of trust and safety.

This pilot will be data-informed and guided. It will terminate if data suggests the technology is ineffective. Utilizing the abilities of the Performance Analytics and Research Unit, the Seattle Police Department has a plan to actively manage performance measures reflecting the “total cost of ownership of public safety,” Equity, Accountability, and Quality (“EAQ”), which includes measures of disparate impact and over-policing. In addition to a robust Continuous Intervention Assessment designed to inform, in real-time, the active development of a safer, more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures just right policing is achieved with undue collateral harm.

### **2.3 Describe the technology involved.**

The core functionality of RTCC software involves integrating multiple sources of information into a single “pane of glass” (a single view). The sources of information that are being integrated with the software are current or expected SPD technologies such as the department’s CAD system (computer-aided dispatch), closed-circuit television cameras (CCTV), Seattle Department of Transportation (SDOT) traffic-monitoring cameras (as referenced in the “Closed Circuit Television ‘Traffic Cameras’ (Transportation)” SIR), automatic vehicle location (AVL) system, body and in-car video cameras, automated license plate readers (ALPR), digital evidence platforms, and 911 call systems.

Most of the technology comes into play around a mapping function which provides the overlay for all the other technologies. The mapping system includes roads, building layouts (when provided), and other layers like beat/sector boundaries. Most RTCC vendors provide this service via cloud-based web applications, as well as mobile applications for use in the field.

While most integrations between RTCC software and department applications occur between vendor APIs, some RTCC vendors use hardware for CCTV cameras that allow for the recording of the camera video, providing the ability to playback CCTV or SDOT traffic monitoring cameras in the RTCC environment. RTCC software for CCTV cameras can also provide in-application video analytics that use machine-learned algorithms to analyze camera feeds and, using object recognition, locate specific items, people based on clothing, or vehicles based on description. This technology complies with the city of Seattle's AI rules for use, requiring a "human in the loop" at the initiation and evaluation of the results. SPD will not use facial

recognition technology. In addition, SPD would not use analytics available in some platforms that combine different data sources and use algorithms or AI to present trends.

Some RTCC vendors produce hardware that allows for private camera owners (such as private businesses or SDOT traffic monitoring cameras) to share specific camera feeds with agencies. This option would be fully voluntary at the discretion of the camera owners. Private camera owners can also set up conditional sharing, meaning they can determine the parameters of what, how, and when their camera feeds are shared. Some vendors also provide a registry so that private camera owners can share the location of the camera, but not the video feeds, so agencies can easily canvass for videos after an incident. The system can then allow SPD to send an email to all registered cameras in an area requesting relevant video. There is no obligation to share footage if a system is registered.

Some RTCC software vendors also include public-facing features such as notification software that allows an agency to push out real-time information to the public in the form of texts for those who opt-in. These functions are like Alert Seattle and Reverse 911 and could be used in large-impact situations such as traffic re-routing, chemical spills, or other life-safety disruptions.

There are also features that allow a rapid video response to calls for service. For example, a community member that calls 911 may be sent a link to their phone to opt-in to a video chat with a 911 operator or officer to provide face-to-face communication to help facilitate accurate officer response and/or medical aid instruction. The caller would need to opt-in to allow the use of their camera, microphone, and GPS. This service could be used in an active shooter situation to help officers assess the situation or other rapidly changing emergency environments.

Other potential features include tools that enable incident planning and real-time management across the department, including freehand sketching of maps, iconography, and differing views for different groups of users, and editing access across a variety of connected devices. Integrating graphical illustration tools with live video and team geolocation creates a flexible and holistic view of emergent incidents, streamlining response capabilities. This feature would help incident commanders utilize mapping capabilities to better manage large-scale events.

Another potential feature allows officers to listen to 911 calls directly, helping to bring small details within the words, tone, or background that can aid responders in achieving desired outcomes. This feature would utilize 911 call recording already in use at the Seattle 911 call center.

Finally, some RTCC software systems have services that allow members of the public to anonymously submit multi-media tips by texting pictures, text, or video to a publicized number. Tips are then stored in the system for examination and potentially used as evidence.

## **2.4 Describe how the project or use of technology relates to the department's mission.**

The mission of the SPD is to prevent crime, enforce the law, and support quality public safety by delivering respectful, equitable, professional, and dependable police services. SPD's

priorities include the use of best practices that include officer safety guidelines and performance-based accountability to provide progressive and responsive police services to crime victims, witnesses, and all members of the community and to structure the organization to support the SPD mission and field a well-trained sworn and non-sworn workforce that uses technology, training, equipment, and research strategically and effectively.

The RTCC software helps provide responsive police services to victims, witnesses, and members of the community by providing responders with more accurate and robust information that does not require significant staffing additions. Using technology that enables quicker, complex, and effective police response aligns with the SPD mission and will benefit the community as a whole.

## **2.5 Who will be involved with the deployment and use of the project / technology?**

At the time of writing, planning is still underway for exactly who would use the RTCC software. The vision is for SPD to staff a real-time crime center with a combination of sworn officers and civilian staff, eventually transitioning to a more civilian-staffed model. Due to the wide functionality of RTCC software, it is likely incident commanders with appropriate training will be the primary users of the software, supported by sworn and civilian staff. The Office of the Inspector General will have full access to the RTCC operation.

## **3.0 Use Governance**

Provide an outline of any rules that will govern the use of the project / technology. Please note: non-City entities contracting with the City are bound by restrictions specified in the surveillance ordinance and privacy principles and must provide written procedures for how the entity will comply with any restrictions identified.

### **3.1 Describe the processes that are required prior to each use, or access to/ of the project / technology, such as a notification, or check-in, check-out of equipment.**

The RTCC will have a set of access controls based on what is required for each user. Only authorized/trained SPD and OIG personnel will have direct access. Data and information obtained through the RTCC may only be accessed or extracted for legitimate law enforcement purposes, as governed by [SPD Policy 12.050](#).

SPD is developing an omnibus surveillance technology policy to provide general guidance on several topics, including value and equity statements for technology use, an explanation of the surveillance ordinance requirements, internal processes for technology approval and acquisition, general tracking metrics for surveillance technologies, retention requirements and limitations, and general use requirements for surveillance technologies. Additionally, issues and guidance unique to specific surveillance technologies would be included for each technology. As such, the department will create a policy section for each surveillance technology, including those proposed here. The need for ALPR and CCTV technologies and

the strategic deployment of the SPD policies is driven by gun violence and persistent felony crime at specific locations. SPD's use of these technologies will focus on these crimes.

### **3.2 List the legal standards or conditions, if any, that must be met before the project / technology is used.**

The SPD does not currently have any policies related to RTCC. As the RTCC will be the platform for different technologies, such as CCTV, any video recordings that are captured will only be preserved as evidence if it is determined a crime has been committed.

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Additionally, issues and guidance unique to specific surveillance technologies would be included for each technology. As such, the department will create a policy section for each surveillance technology, including those proposed here. The need for ALPR and CCTV technologies and the strategic deployment of the SPD policies is driven by gun violence and persistent felony crime at specific locations. SPD's use of these technologies will focus on these crimes.

The use of CCTV will comply with [SMC Chapter 14.12](#), Collection of Information for Law Enforcement Purposes. All existing SPD policies related to technology and Criminal Justice Information Systems will apply to the RTCC. ([Policy 12.050](#)). All use of the RTCC will be for legitimate law enforcement purposes only and personal or inappropriate use or dissemination of information can result in internal discipline, termination, and penalties under federal or state law.

### **3.3 Describe the policies and training required of all personnel operating the project / technology, and who has access to ensure compliance with use and management policies.**

Supervisors and commanding officers are responsible for ensuring compliance with SPD policies.

Access to the RTCC will only be made accessible to authorized SPD, OPA, and OIG personnel. Authorized personnel will receive SPD-developed training in the use of the RTCC and related policy, operation, and procedures prior to receiving system access.

All SPD employees must adhere to laws, City policy, and Department Policy ([SPD Policy 5.001](#)), and any employees suspected of being in violation of laws or policy or other misconduct are subject to discipline, as outlined in [SPD Policy 5.002](#).

## 4.0 Data Collection and Use

### 4.1 Provide details about what information is being collected from sources other than an individual, including other IT systems, systems of record, commercial data aggregators, publicly available data and/or other City departments.

The RTCC software integrates data from other SPD systems into a centralized location for real-time information and analysis. Data feeding into RTCC could come from dispatch, CCTVs, SDOT traffic monitoring cameras, officer location, 911 calls, records management systems (RMS), ALPR, geographic information systems (GIS), and other information systems. Information from some of these systems may be stored in storage related to the RTCC software to provide a comprehensive record of an incident. Storage of information not used for investigations or law-enforcement uses would be for 30 days maximum.

SDOT traffic monitoring cameras (as referenced in the “Closed Circuit Television ‘Traffic Cameras’ (Transportation)” SIR) will be utilized in the RTCC software for law enforcement purposes.

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense (GO) Report. Evidence is submitted to the Evidence Unit and associated with a specific GO Number and investigation.

### 4.2 What measures are in place to minimize inadvertent or improper collection of data?

The RTCC software is used to integrate data from various sources used by SPD into one place, a single window view. All data sources have their own pre-existing controls in place to minimize inadvertent or improper collection, as outlined in previous surveillance impact reports for the relevant technology.

The RTCC software itself will store some of the data from the integrated systems to provide a comprehensive picture of an incident. Data that is not part of a criminal investigation will be subject to a 30-day retention policy, after which it will be purged from the system.

### 4.3 How and when will the project / technology be deployed or used? By whom? Who will determine when the project / technology is deployed and used?

The desired deployment date is mid-2024. SPD’s vision is to have a RTCC staffed by a combination of sworn and civilian staff that will monitor the RTCC software and provide information to patrol officers and detectives. Access may be given to detectives and patrol officers in certain situations and with appropriate training. The system will be used by incident commanders at the scene of major crimes and other events requiring police engagement.

The SPD Technology and Innovation Unit will be the initial owner of the system and will manage implementation.

**4.4 How often will the technology be in operation?**

The technology will be in continuous operation.

**4.5 What is the permanence of the installation? Is it installed permanently, or temporarily?**

The installation of the RTCC software is permanent and will operate 24/7.

**4.6 Is a physical object collecting data or images visible to the public? What are the markings to indicate that it is in use? What signage is used to determine department ownership and contact information?**

There will be no new physical objects or sensors collecting data as part of the RTCC software package. It integrates existing data sources into one centralized platform. Some of the data sources feeding into the RTCC do have physical equipment that is visible to the public, such as CCTV cameras.

**4.7 How will data that is collected be accessed and by whom?**

Only authorized SPD, OPA, and users can access the RTCC software platform. Access to the systems/technology is limited to authorized personnel via password-protected login credentials.

Data extracted from the system/technology and entered into investigative files is securely inputted and used on SPD's password-protected network with access limited to authorized detectives and identified supervisory personnel.

All SPD employees are backgrounded and access is controlled by SPD Manual Title 12 provisions governing Department Information Systems including [SPD Policy 12.040](#) - Department-Owned Computers, Devices & Software, [SPD Policy 12.050](#) - Criminal Justice Information Systems, [SPD Policy 12.080](#) - Department Records Access, Inspection & Dissemination, [SPD Policy 12.110](#) - Use of Department E-mail & Internet Systems, and [SPD Policy 12.111](#) - Use of Cloud Storage Services.

All use of the RTCC will be for law enforcement purposes only. Personal or inappropriate use or dissemination of information can result in internal discipline, termination, and penalties under federal or state law.

**4.8 If operated or used by another entity on behalf of the City, provide details about access, and applicable protocols.**

Other law enforcement agencies have used similar RTCC platforms to share information during serious incidents that span jurisdictions. For example, an active shooter in the City of Atlanta was apprehended in a neighboring county that was using the same RTCC platform as the City of Atlanta.

Any direct usage by a different jurisdiction will be consistent with SPD policy.

#### **4.9 What are acceptable reasons for access to the equipment and/or data collected?**

RTCC software will be accessed and used for serious incidents happening in real-time to provide information to patrol resources. It will also be used to provide a comprehensive picture of numerous SPD systems to investigators.

Data held in the RTCC system may only be viewed or extracted for legitimate law enforcement purposes, as governed by [SPD Policy 12.050](#).

#### **4.10 What safeguards are in place, for protecting data from unauthorized access (encryption, access control mechanisms, etc.) And to provide an audit trail (viewer logging, modification logging, etc.)?**

RTCC software data will be stored within secure City of Seattle facilities under the administration of the Seattle Information Technology Department. If cloud storage is utilized, it will follow city security guidelines and only be accessible to outside parties as part of system maintenance and support only when authorized.

Various measures will be in place to protect data from unauthorized access.

- Data Encryption
- Access control mechanisms (meeting CJIS requirements\*)
- Strict user permission settings
- Industry standard network security measures (meeting CJIS requirements)

The system will maintain audit logs of user and system actions. These logs will be maintained within the system and be accessible to those with permission to view. Logs will be accessible to the Office of Inspector General upon request.

\* Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI) sets requirements for organizations that access or use criminal justice information. These requirements are referred to as "[CJIS requirements](#)" and are developed and audited for compliance by the FBI.

## **5.0 Data Storage, Retention and Deletion**

### **5.1 How will data be securely stored?**

Any incident or multimedia data extracted from the system will be stored in a method compliant with the FBI's CJIS requirements. The specific details are vendor dependent, but could include either cloud storage or on-premise storage. The storage configuration may vary from vendor to vendor, but SPD expects similar industry standards when it comes to cloud storage and access controls.

### **5.2 How will the owner allow for departmental and other entities, to audit for compliance with legal deletion requirements?**

The retention period for data stored by RTCC software will be 30 days, data will be overwritten after that retention period expires. Data associated with criminal investigations will be saved as evidence in SPD's digital evidence locker consistent with retention guidelines for evidence.

Audits from the OIG or other official auditors, will be allowed as needed.

### **5.3 What measures will be used to destroy improperly collected data?**

Per SIR section 5.2, RTCC data collected without evidentiary value will be automatically purged by the system after 30 days.

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense Report. Evidence is submitted to the Evidence Unit and associated with a specific GO Number and investigation.

All information must be gathered and recorded in a manner that is consistent with [SPD Policy 6.060](#), such that it does not reasonably infringe upon "individual rights, liberties, and freedoms secured by the Constitution of the United States and of the State of Washington, including, among others, the freedom of speech, press, association and assembly; liberty of conscience; the exercise of religion; and the right to petition government for redress of grievances; or violate an individual's right to privacy."

All SPD employees must adhere to laws, City policy, and Department Policy ([SPD Policy 5.001](#)), and any employees suspected of being in violation of laws or policy or other misconduct are subject to discipline, as outlined in [SPD Policy 5.002](#).

### **5.4 which specific departmental unit or individual is responsible for ensuring compliance with data retention requirements?**

Unit supervisors are responsible for ensuring compliance with data retention requirements within SPD.

Additionally, any appropriate auditor, including the OIG, can audit for compliance at any time.

## **6.0 Data Sharing and Accuracy**

### **6.1 Which entity or entities inside and external to the City will be data sharing partners?**

Data obtained from the technology may be shared outside SPD with the other agencies, entities, or individuals within legal guidelines or as required by law.

Data may be shared with outside entities in connection with criminal prosecutions:

- Seattle City Attorney's Office
- King County Prosecuting Attorney's Office
- King County Department of Public Defense
- Private Defense Attorneys
- Seattle Municipal Court

- King County Superior Court
- Similar entities where prosecution is in Federal or other State jurisdictions

Data may be made available to requesters pursuant to the Washington Public Records Act, [Chapter 42.56 RCW](#) (“PRA”). SPD will apply applicable exemptions to the data before disclosing to a requester. Individuals have the right to inspect criminal history record information maintained by the department ([RCW 10.97.030](#), [SPD Policy 12.050](#)). Individuals can access their own information by submitting a public disclosure request.

Per [SPD Policy 12.080](#), the Crime Records Unit is responsible for receiving, recording, and responding to requests “for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies.”

Discrete pieces of data collected or compiled by the RTCC software may be shared with other law enforcement agencies in wanted bulletins, and in connection with law enforcement investigations jointly conducted with those agencies, or in response to requests from law enforcement agencies investigating criminal activity as governed by [SPD Policy 12.050](#) and [12.110](#). All requests for data from Federal Immigration and Customs Enforcement (ICE) authorities are referred to the Mayor’s Office Legal Counsel in accordance with the Mayoral Directive, dated February 6, 2018.

SPD shares data with authorized researchers to execute research and confidentiality agreements as provided by [SPD Policy 12.055](#). This sharing may include discrete pieces of data related to specific investigative files collected by the devices.

## 6.2 Why is data sharing necessary?

Data sharing is necessary for SPD to fulfill its mission of contributing to crime reduction by assisting in collecting evidence related to criminal activity as part of investigations, and to comply with legal requirements.

## 6.3 Are there any restrictions on non-City data use?

Yes ☒ No ☐

### 6.3.1 If you answered yes, provide a copy of the department’s procedures and policies for ensuring compliance with these restrictions.

Law enforcement agencies receiving criminal history information are subject to the requirements of [CFR Title 28, Part 20](#), regulating criminal justice information systems. In addition, Washington State law enforcement agencies are subject to the provisions of [WAC 446-20-260](#) (auditing and dissemination of criminal history record information systems), and [RCW Chapter 10.97](#) (Washington State Criminal Records Privacy Act).

Once disclosed in response to PRA request, there are no restrictions on non-City data use; however, applicable exemptions will be applied prior to disclosure to any requestor who is not authorized to receive exempt content.

**6.4 How does the project/technology review and approve information sharing agreements, memorandums of understanding, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies?**

Sharing agreements must meet the standards reflected in [SPD Policy 12.055](#). Law enforcement agencies receiving criminal history information are subject to the requirements of [CFR Title 28, Part 20](#). In addition, Washington State law enforcement agencies are subject to the provisions of [WAC 446-20-260](#), and [RCW Chapter 10.97](#).

Following Council approval of the SIR, SPD must seek Council approval for any material change to the purpose or manner in which the RTCC software platform may be used.

**6.5 Explain how the project/technology checks the accuracy of the information collected. If accuracy is not checked, please explain why.**

Real-time crime center software data comes from various SPD systems and is blended into one single view/location. Accuracy of data flows over APIs are checked at the point of development and monitored by system administrator and system logging thereafter. The system administrator is responsible for monitoring API versioning and change management to proactively plan and avoid issues. In addition, as data is being received and analyzed in the RTCC, specially trained individuals are reviewing and assessing the data and making judgments about the quality, accuracy, suitability, and value of the information being collected.

**6.6 Describe any procedures that allow individuals to access their information and correct inaccurate or erroneous information.**

Individuals may request records pursuant to the PRA, and individuals have the right to inspect criminal history record information maintained by the department ([RCW 10.97.030](#), [SPD Policy 12.050](#)). Individuals can access their own information by submitting a public disclosure request.

## **7.0 Legal Obligations, Risks and Compliance**

**7.1 What specific legal authorities and/or agreements permit and define the collection of information by the project/technology?**

Both the content and means of collection of information that may be utilized by the RTCC is regulated by the Fourth Amendment of the United States Constitution, Article I, Sec. 7 of the Washington State Constitution, case law interpreting the same, [Washington's Privacy Act](#), [RCW 9.73](#), [CFR Title 28, Part 23](#), and Seattle's Intelligence Ordinance, [SMC Chapter 14.12](#).

**7.2 Describe what privacy training is provided to users either generally or specifically relevant to the project/technology.**

[SPD Policy 12.050](#) mandates that all SPD employees receive Security Awareness Training (Level 2), and all employees also receive City Privacy Training.

**7.3 Given the specific data elements collected, describe the privacy risks identified and for each risk, explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.**

[SMC 14.12](#) and [SPD Policy 6.060](#) directs all SPD personnel that any documentation of information concerning a person's sexual preferences or practices, or their political or religious activities must be for a relevant reason and serve a legitimate law enforcement purpose. The purpose of policy 6.060 is "to ensure that the collection and review of such information serves a legitimate law enforcement purpose and does not unreasonably infringe upon individual rights, liberties, and freedoms secured by the Constitution of the United States and of the State of Washington, including, among others, the freedom of speech, press, association and assembly; liberty of conscience; the exercise of religion; and the right to petition government for redress of grievances; or violate an individual's right to privacy." SPD would only document sexual preferences or practices, political or religious activities if it is related to an unlawful act occurring, for example; as seen in a child pornography investigation.

Additionally, [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior, as well as accountability measures. The policy states that "employees shall not make decisions or take actions that are influenced by bias, prejudice, or discriminatory intent. Law enforcement and investigative decisions must be based upon observable behavior or specific intelligence," as well as outlining specifics related to this area.

Finally, see 5.3 for a detailed discussion about procedures related to noncompliance.

**7.4 Is there any aspect of the project/technology that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?**

As stated above, RTCC software integrates dispatch, camera, officer location, 911 calls, records management system, and other information into one platform. With the nature of data obtained through the RTCC, there is some risk that private information may be obtained about members of the public without their knowledge. This risk and those privacy risks outlined in 7.3 above are mitigated by legal requirements and auditing processes that allow for authorized auditors, including the Office of Inspector General, to inspect use and deployment of the RTCC software. Additionally, the Office of Police Accountability can conduct investigations of possible violations of City and SPD privacy-related policies and laws.

## 8.0 Monitoring and Enforcement

### 8.1 Describe how the project/technology maintains a record of any disclosures outside of the department.

Sharing of digital evidence outside the department is primarily done through SPD's digital evidence management system. Records of when data was shared and who it is shared with is noted in the system audit logs. Digital evidence shared outside of the digital evidence management system (e.g., using media such as DVDs, thumb drives, etc.) is done through SPD's Digital Forensic Unit, which logs requests.

Per [SPD Policy 12.080](#), the Crime Records Unit is responsible to receive and record all requests "for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies."

Any requests for public disclosure are logged by SPD's Public Disclosure Unit. Any action taken, and data released subsequently, is then tracked through the request log. Responses to Public Disclosure Requests, including responsive records provided to a requestor, are retained by SPD for two years after the request is completed.

### 8.2 What auditing measures are in place to safeguard the information, and policies that pertain to them, as well as who has access to the audit data? Explain whether the project/technology conducts self-audits, third party audits or reviews.

The Office of Inspector General conducts independent audits of SPD as instructed by the City Council and by City ordinance.

## Financial Information

### Purpose

This section provides a description of the fiscal impact of the surveillance technology, as required by the surveillance ordinance.

### 1.0 Fiscal Impact

Provide a description of the fiscal impact of the project/technology by answering the questions below.

#### 1.1 Current or potential sources of funding: initial acquisition costs.

Current ☐ potential ☒

| Date of initial acquisition | Date of go live | Direct initial acquisition cost | Professional services for acquisition | Other acquisition costs | Initial acquisition funding source |
|-----------------------------|-----------------|---------------------------------|---------------------------------------|-------------------------|------------------------------------|
| Q4 2024                     | Q2 2025         | \$300,000                       | \$0                                   | \$100,000               | General Fund                       |
|                             |                 |                                 |                                       |                         |                                    |

Notes:

Please consult the material update summary and fiscal note.

#### 1.2 Current or potential sources of funding: on-going operating costs, including maintenance, licensing, personnel, legal/compliance use auditing, data retention and security costs.

Current ☐ potential ☒

| Annual maintenance and licensing | Legal/compliance, audit, data retention and other security costs | Department overhead | IT overhead | Annual funding source |
|----------------------------------|------------------------------------------------------------------|---------------------|-------------|-----------------------|
| TBD                              | TBD                                                              | TBD                 | TBD         | TBD                   |

Notes:

#### 1.3 Cost savings potential through use of the technology

The use of RTCC software may help mitigate SPD's shortage of sworn staffing by more effectively deploying patrol resources to incidents and follow-up investigations. However, use of the RTCC software and the other related technologies being assessed does not necessarily correlate to direct cost savings.

#### 1.4 Current or potential sources of funding including subsidies or free products offered by vendors or governmental entities.

No funding beyond city General Fund dollars has been identified for this technology.

## Expertise and References

### Purpose

The following information is provided to ensure that Council has a group of experts to reference while reviewing the completed surveillance impact report (“SIR”). Any individuals or agencies referenced must be made aware ahead of publication that their information has been included. All materials must be available for Council to access or review, without requiring additional purchase or contract.

### 1.0 Other Government References

Please list any other government bodies that have implemented this technology and can speak to the implementation of this technology.

| Agency, municipality, etc. | Primary contact | Description of current use |
|----------------------------|-----------------|----------------------------|
| Atlanta                    |                 | Currently in use           |
| Detroit                    |                 | Currently in use           |
| Mesa, AZ                   |                 | Currently in use           |
| Orange County, CA          |                 | Currently in use           |
| Washington DC              |                 | Deployed February 2024     |

### 2.0 Academics, Consultants, and Other Experts

Please list any experts in the technology under consideration, or in the technical completion of the service or function the technology is responsible for.

| Agency, municipality, etc. | Primary contact | Description of current use |
|----------------------------|-----------------|----------------------------|
|                            |                 |                            |

### 3.0 White Papers or Other Documents

Please list any publication, report or guide that is relevant to the use of this technology or this type of technology.

| Title                             | Publication | Link                                                                                                                                                                                                                  |
|-----------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bureau of Justice Assistance RTCC |             | <a href="https://bja.ojp.gov/sites/g/files/xyckuh186/files/media/document/RealTimeCrimeCenterInformation.pdf">https://bja.ojp.gov/sites/g/files/xyckuh186/files/media/document/RealTimeCrimeCenterInformation.pdf</a> |

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# Racial Equity Toolkit (“RET”) and engagement for public comment worksheet

## Purpose

Departments submitting a SIR are required to complete an adapted version of the Racial Equity Toolkit (“RET”) in order to:

- Provide a framework for the mindful completion of the SIR in a way that is sensitive to the historic exclusion of vulnerable and historically underrepresented communities. Particularly, to inform the public engagement efforts departments will complete as part of the surveillance impact report.
- Highlight and mitigate any impacts on racial equity from the adoption and the use of the technology.
- Highlight and mitigate any disparate impacts on individuals or vulnerable communities.
- Fulfill the public engagement requirements of the surveillance impact report.

In addition to completing the RET template sections below, the 2024 Council Budget Action SPD-900-A requested that the Executive, the Office for Civil Rights (OCR) and the Inspector General for Public Safety (OIG) co-prepare a Racial Equity Toolkit (RET) analysis for these technologies, pursuant to the process that the Executive has already created to comply with the Surveillance Ordinance. Please see Appendix B: Office for Civil Rights RET Analysis.

## Adaptation of the RET for Surveillance Impact Reports

The RET was adapted for the specific use by the Seattle Information Technology Departments’ (“Seattle IT”) Privacy Team, the Office of Civil Rights (“OCR”), and Change Team members from Seattle IT, Seattle City Light, Seattle Fire Department, Seattle Police Department, and Seattle Department of Transportation.

## Racial Equity Toolkit Overview

The vision of the Seattle Race and Social Justice Initiative (“RSJI”) is to eliminate racial inequity in the community. To do this requires ending individual racism, institutional racism and structural racism. The RET lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity.

### 1.0 Set Outcomes

**1.1. Seattle City Council has defined the following inclusion criteria in the surveillance ordinance, and they serve as important touchstones for the risks departments are being asked to resolve and/or mitigate. Which of the following inclusion criteria apply to this technology?**

☐ The technology disparately impacts disadvantaged groups.

☐ There is a high likelihood that personally identifiable information will be shared with non-City entities that will use the data for a purpose other than providing the City with a contractually agreed-upon service.

☒ The technology collects data that is personally identifiable even if obscured, de-identified, or anonymized after collection.

☒ The technology raises reasonable concerns about impacts to civil liberty, freedom of speech or association, racial equity, or social justice.

## **1.2 What are the potential impacts on civil liberties through the implementation of this technology? How is the department mitigating these risks?**

The information presented in this RET is specific to the initial pilot areas of Aurora Ave. N, Chinatown/International District, and the 3rd Ave./Downtown Core.

Gun violence, human trafficking, and other persistent felony crimes are concentrated at specific geographic places in the city. This concentrated crime is often anchored at these places and requires a holistic crime-prevention strategy.

The Crime Prevention Technology pilot, including the RTCC, is one integrated component to this overall strategy of addressing this issue. These technologies will be coupled with police patrols, continued investments in community-based initiatives, enhanced lighting, and enhanced cleaning.

The technology will be used for the following purposes:

- Closed-Circuit (CCTV) camera systems will assist investigators in collecting evidence related to serious and violent crimes, including homicides, assaults, and other offenses. The CCTV system can aid investigators in identifying suspects, clearing the innocent, and removing deadly weapons from the street, thereby reducing the risk of harm to the public.
- Real-Time Crime Center (RTCC) software helps provide situational awareness to increase officers' and the public's safety and reactively investigate incidents. Having real-time, accurate information in one place helps increase the reliability of the location of victims and suspects, enabling quicker aid and safer apprehension. Having better visual and spatial suspect information will help reduce unnecessary stops by officers, focusing their efforts on verified locations and accurate descriptions.

Potential impacts on civil liberties include but are not limited to:

- Privacy concerns associated with surveillance of people, vehicles, and license plates in public places.
- Misuse of collected video and information/mission creep.
- Lack of transparency with the public on what is being done with recordings.
- Loss of personal autonomy with surveillance of an area.

To mitigate these potential community concerns, SPD will:

- Post signs indicating that police surveillance and video recordings are occurring.
- Notification of the technology being used will be shared with the neighborhoods where it is deployed through community meetings and active canvassing with street fliers.
- Ensure technology is being used for crimes related to gun violence, human trafficking, and other persistent crimes in the surveillance area.
- SPD will create a public-facing dashboard that will update frequently and report on the uses of the technologies, including areas where cameras are recording, and the resulting number of police actions, such as arrests, court-authorized warrants, recovery of stolen vehicles, or other law enforcement actions.
- CCTV technology will only monitor public places, such as sidewalks, streets, and parks.
- Recorded material from CCTV cameras or the compilation of data at the RTCC, will only be kept for 30 days unless it is evidence of criminal behavior, in which case it will be transferred to SPD's secure digital evidence storage system. ALPR data will be maintained for 90 days and then deleted unless it contains evidence of criminal behavior.
- Provide access to CCTV, ALPR, and SPD's Real Time Crime Center (RTCC) user and device logs to the Office of Inspector General (OIG) for compliance audits.
- The Office of the Inspector General will have full access to the RTCC operation.
- The Office of Police Accountability may conduct investigations of violations of SPD policies and laws related to privacy.

Additionally, the technologies will only be implemented once the City's surveillance ordinance requirements are met, and the City Council authorizes the use.

### **1.3 What are the risks for racial or ethnicity-based bias through each use or deployment of this technology? How is the department mitigating these risks?**

*Include a description of any issues that may arise such as algorithmic bias or the possibility for ethnic bias to emerge in people and/or system decision-making.*

The mission of the Seattle Police Department is to prevent crime, enforce the law, and support quality public safety by delivering respectful, professional, and dependable police services. [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior and other accountability measures. This pilot will be data-informed and guided. It will terminate if data suggests the technology is ineffective. Utilizing the abilities of the Performance Analytics and Research Unit, the Seattle Police Department has a plan to actively manage performance measures reflecting the "total cost of ownership of public safety," Equity, Accountability, and Quality ("EAQ"), which includes measures of disparate impact and over policing. In addition to a robust *Continuous Intervention Assessment* designed to inform, in real-time, the active development of a safer and more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures *just right* policing is achieved with undue collateral harm.

It's worth noting that many factors can contribute to disparate impacts in policing, most of which occur early in a person's life, long before there is engagement with the police. For example, systems and policies that perpetuate poverty, the failure to provide children with the strong and fair start they deserve in the crucial birth-to-five years, inadequate public education, and a lack of economic opportunity can all contribute to disparate outcomes. In addition, family dynamics and peer pressure can also create negative outcomes. We recognize these factors and strive to do our part to mitigate them, but we can't expect our police officers by themselves to cure these contributory factors. However, we do expect our officers to do their jobs respectfully and fairly as they interact with community members.

These technologies are location-specific, with a place-based focus, meaning they will record people in a public place where the technologies are being used. This mitigating factor reduces, to an extent, the possible disparate impact of potential police actions.

#### 1.4 Where in the City is the technology used or deployed?

The following neighborhoods are being considered for deploying the CCTV technologies. Specific areas will be selected based on the data analysis indicating where gun violence, human trafficking, and persistent felony crimes are concentrated.

☐ all Seattle neighborhoods

☒ **Aurora Ave N 85th to 145th**

☐ Ballard

☒ **Belldtown**

☐ Beacon Hill

☐ Capitol Hill

☐ Central District

☒ **Chinatown/International District**

☐ Columbia City

☒ **Downtown Commercial Core**

☐ Delridge

☐ First Hill

☐ Georgetown

☐ Greenwood / Phinney

☐ International District

☐ Interbay

☐ North

☐ Northeast

☐ Northwest

☐ Madison Park / Madison Valley

☐ Magnolia

☐ Rainier Beach

☐ Ravenna / Laurelhurst

☐ South Lake Union / Eastlake

☐ Southeast

☐ Southwest

☐ South Park

☐ Wallingford / Fremont

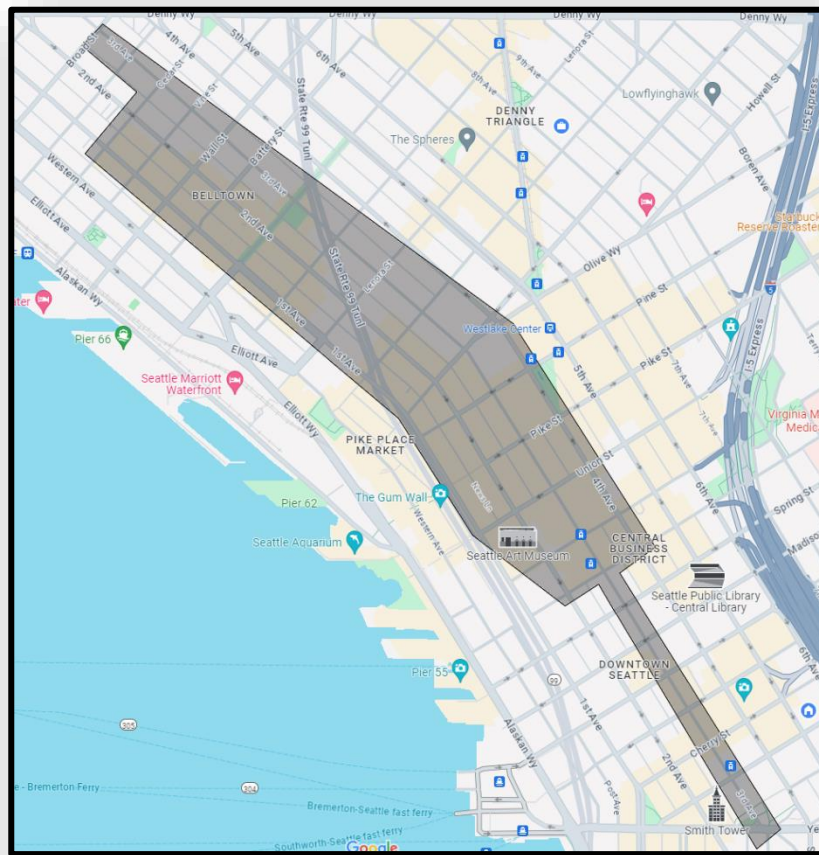
☐ West Seattle

☐ King county (outside Seattle) (Mutual Aid)

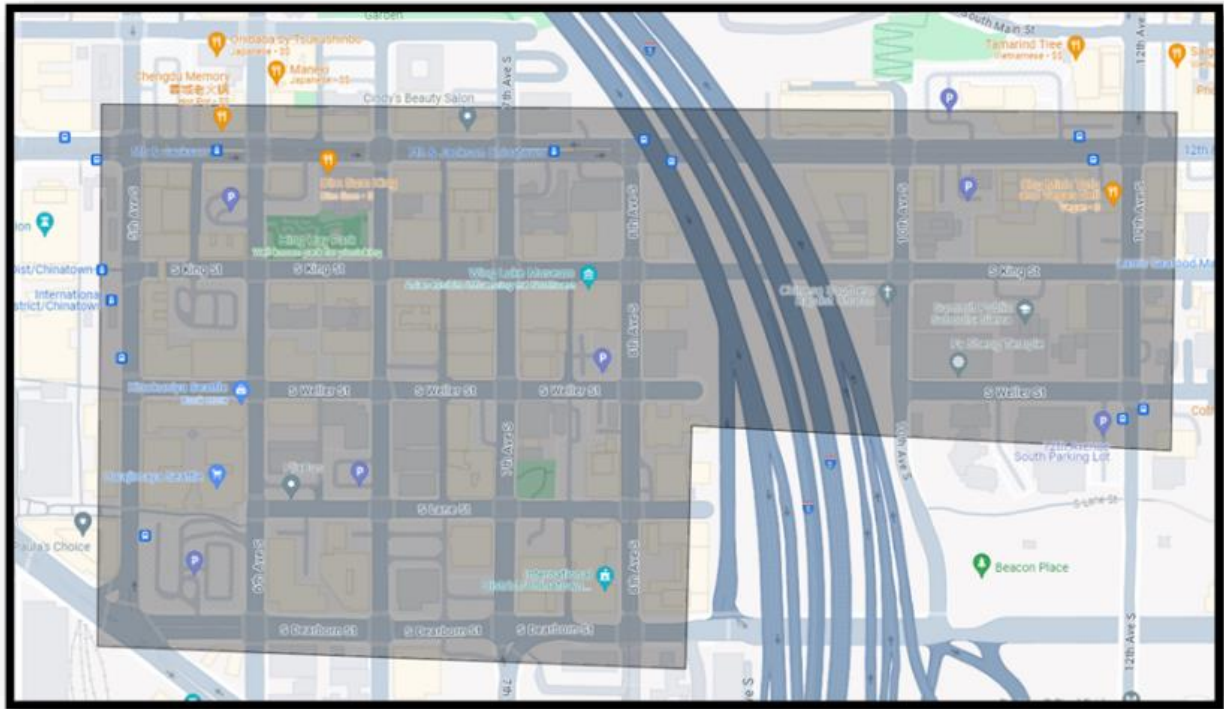
☐ Outside King County (Mutual Aid)

If possible, please include any maps or visualizations of historical deployments / use.

### Downtown & Belltown Area *(Potential location)*



### Chinatown-International District Area *(Potential)*



**Aurora Avenue North Corridor**  
(Potential; Aurora Ave, 85<sup>th</sup> to 145<sup>th</sup> Streets)



### 1.4.1 What are the racial demographics of those living in this area or impacted by these issues?

| Race/Ethnicity                                                                                                                                                                                                                                                                                                                                                                        | Aurora | Chinatown<br>International District | Belltown | Downtown<br>Commercial | Citywide |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------------------|----------|------------------------|----------|
| American Indian<br>or Alaska Native                                                                                                                                                                                                                                                                                                                                                   | 0.8%   | 0.7%                                | 0.6%     | 1.1%                   | 0.4%     |
| Asian                                                                                                                                                                                                                                                                                                                                                                                 | 14.0%  | 49.2%                               | 30.4%    | 16.8%                  | 16.9%    |
| Black/African<br>American                                                                                                                                                                                                                                                                                                                                                             | 8.9%   | 8.6%                                | 5.5%     | 11.1%                  | 6.8%     |
| Hispanic or<br>Latino of Any<br>Race                                                                                                                                                                                                                                                                                                                                                  | 11.3%  | 7.6%                                | 7.1%     | 8.3%                   | 8.2%     |
| Native Hawaiian<br>or Pacific<br>Islander                                                                                                                                                                                                                                                                                                                                             | 0.3%   | 0.2%                                | 0.2%     | 0.3%                   | 0.3%     |
| Other                                                                                                                                                                                                                                                                                                                                                                                 | 0.7%   | 0.7%                                | 0.6%     | 0.7%                   | 0.6%     |
| Multiple Races                                                                                                                                                                                                                                                                                                                                                                        | 7.9%   | 5.8%                                | 4.9%     | 5.6%                   | 7.3%     |
| White                                                                                                                                                                                                                                                                                                                                                                                 | 56.2%  | 27.2%                               | 50.8%    | 56.1%                  | 59.5%    |
| <p>Source: U.S. Census Bureau Decennial Census; OPCD</p> <p>Note: Geographical areas provided are <u>2020 Census Block Assignments of <a href="#">Urban Villages</a></u> within the Downtown Urban Center, with the exception of Aurora. Aurora's boundaries are based on ½ mile buffer from Aurora between Meridian and Greenwood, and from 85<sup>th</sup> to 145<sup>th</sup>.</p> |        |                                     |          |                        |          |

**1.4.2 How does the Department to ensure diverse neighborhoods, communities, or individuals are not specifically targeted through the use or deployment of this technology?**

CCTV will be deployed where crimes related to gun violence, human trafficking, and other persistent felony crimes are concentrated. [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior, as well as other accountability measures. This technology does not enhance the risks of racial or ethnicity-based bias.

These technologies are geographically focused on specific areas where gun violence, human trafficking, and other persistent felony crimes are concentrated. They are focused on individuals only if they are present in these areas.

**1.5 How do decisions around data sharing have the potential for disparate impact on historically targeted communities? What is the department doing to mitigate those risks?**

Data from the technology may be shared outside SPD with other agencies, entities, or individuals within legal guidelines or as required by law. Data may be shared with outside entities in connection with criminal prosecutions.

Data may be made available to requesters under the Washington Public Records Act, Chapter [42.56 RCW](#) ("PRA").

Data sharing has the potential to be a contributing factor to disparate impact on historically marginalized communities. To mitigate this possibility, SPD has established policies regarding disseminating data related to criminal prosecutions, Washington Public Records Act (Chapter [42.56 RCW](#)), and authorized researchers. Further, [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior.

**1.6 How do decisions around data storage and retention have the potential for disparate impact on historically targeted communities? What is the department doing to mitigate those risks?**

As with decisions around data sharing, data storage and data retention have similar potential for disparate impact on historically marginalized communities. CCTV will be deployed where crimes related to gun violence, human trafficking, and other persistent felony crimes are concentrated. Video from CCTVs will be stored for 30 days unless imagery is needed for investigations or to comply with legal requirements. Further, [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior, and other accountability measures.

**1.7 What are potential unintended consequences (both negative and positive potential impact)? What proactive steps can you/ have you taken to ensure these consequences do not occur.**

The most important unintended possible negative consequence related to the implementation of CCTVs and the RTCC is the possibility that the civil rights of individuals may be compromised by unreasonable surveillance. To mitigate this risk, SPD is enacting a specific policy codifying the allowable circumstances under which SPD may utilize CCTVs and Real-Time Crime Center software. Access to user and device logs will be given to the OIG so they can audit the use of these technologies.

To prevent unintended outcomes, the City will develop and post signs in areas that are covered by the cameras' view to alert the public to their presence and use. Active canvassing in pilot locations and passing out street fliers will occur to further inform the public about the use of the technologies in the impacted neighborhoods. Additionally, the Office of the Inspector General will have access at any time to monitor and evaluate the use of these technologies. During the public outreach sessions described below, the City will listen to feedback from the public and provide responses during the technology review process.

The potential positive impact will be reduced serious crime concentrated in the locations where the technologies are deployed. If achieved, these reductions will create a safer environment for everyone who lives, works, plays, or visits these areas.

## 2.0 Public Outreach

SMC 14.18 does not require material updates to go through the same process as the original SIR.

## 3.0 Public Comment Analysis

The public comment period was June 3, 2025 to June 23, 2025.

### 3.1 Summary of Response Volume

Please see Appendix B.

### 3.2 Question One: What concerns, if any, do you have about the use of this technology?

Please see Appendix B.

### 3.3 Question Two: What value, if any, do you see in the use of this technology?

Please see Appendix B.

### 3.4 Question Three: What would you want City leadership to consider when making a decision about the use of this technology?

Please see Appendix B.

### 3.5 Question Four: General response to the technology.

Please see Appendix B.

### 3.5 General Surveillance Comments

These are comments received that are not particular to any technology currently under review.

Please see Appendix B.

## 4.0 Response to Public Comments

This section will be completed after the public comment period has been completed on April 12, 2024.

### 4.1 How will you address the concerns that have been identified by the public?

Concerns that have been raised through public comment and engagement will be addressed in SPD policy. SPD is developing an omnibus surveillance technology policy to provide general guidance on several topics, including value and equity statements for technology use, an explanation of the surveillance ordinance requirements, internal processes for technology approval and acquisition, general tracking metrics for surveillance technologies, retention requirements and limitations, and general use requirements for surveillance technologies. Additionally, issues and guidance unique to specific surveillance technologies would be included for each technology. As such, the department will create a policy section for RTCC.

## 5.0 Equity Annual Reporting

### 5.1 What metrics for this technology be reported to the CTO for the annual equity assessments?

The goals of this project are:

1. Reduction in gun violence, human trafficking, and other persistent felony crimes in specific geographic areas where the technologies are deployed.
2. Reduction in 911 calls in the pilot area.
3. To measure and minimize crime displacement outside of the pilot area.
4. Improved police response times, crime clearance rates, and community satisfaction measures.

We will also report the rate of arrests and prosecutions that occur because of the pilot and any negative unintended consequences, such as over or under policing.

The Seattle Police Department, utilizing the Data Analytics Team and working with the Office of the Inspector General, will monitor these objectives and the outcomes closely to watch for disparate impacts. If data analysis shows any disparate impacts, SPD will work with the the Office of the Inspector General to make the needed changes to address these impacts. Further, the City will retain outside academic subject matter experts to develop and manage an evaluation plan related to the use of the technologies.

## Privacy and Civil Liberties Assessment

### Purpose

This section shall be completed after public engagement has concluded and the department has completed the racial equity toolkit section above. The privacy and civil liberties assessment is completed by the community surveillance working group (“working group”), per the surveillance ordinance which states that the working group shall:

“Provide to the executive and the City Council a privacy and civil liberties impact assessment for each SIR that must be included with any departmental request for surveillance technology acquisition or in-use approval. The impact assessment shall include a description of the potential impact of the surveillance technology on civil rights and liberties and potential disparate impacts on communities of color and other marginalized communities. The CTO shall share with the working group a copy of the SIR that shall also be posted during the period of public engagement. At the conclusion of the public engagement period, the CTO shall share the final proposed SIR with the working group at least six weeks prior to submittal of the SIR to Council for approval. The working group shall provide its impact assessment in writing to the executive and the City Council for inclusion in the SIR within six weeks of receiving the final proposed SIR. If the working group does not provide the impact assessment before such time, the working group must ask for a two-week extension of time to City Council in writing. If the working group fails to submit an impact statement within eight weeks of receiving the SIR, the department and City Council may proceed with ordinance approval without the impact statement.”

### Working Group Privacy and Civil Liberties Assessment

SMC 14.18 does not require material updates to go through the same process as the original SIR. Please consult [Ordinance 127111](#) adopted by the City Council on 10/08/24 to view the original Privacy and Civil Liberties Assessment.

## Appendix A: Glossary

**Accountable:** (taken from the racial equity toolkit.) Responsive to the needs and concerns of those most impacted by the issues you are working on, particularly to communities of color and those historically underrepresented in the civic process.

**Community outcomes:** (taken from the racial equity toolkit.) The specific result you are seeking to achieve that advances racial equity.

**Contracting equity:** (taken from the racial equity toolkit.) Efforts to achieve equitable racial outcomes in the way the City spends resources, including goods and services, consultants and contracting.

**DON:** “department of neighborhoods.”

**Immigrant and refugee access to services:** (taken from the racial equity toolkit.) Government services and resources are easily available and understandable to all Seattle residents, including non-native English speakers. Full and active participation of immigrant and refugee communities exists in Seattle’s civic, economic and cultural life.

**Inclusive outreach and public engagement:** (taken from the racial equity toolkit.) Processes inclusive of people of diverse races, cultures, gender identities, sexual orientations and socio-economic status. Access to information, resources and civic processes so community members can effectively engage in the design and delivery of public services.

**Individual racism:** (taken from the racial equity toolkit.) Pre-judgment, bias, stereotypes about an individual or group based on race. The impacts of racism on individuals including white people internalizing privilege, and people of color internalizing oppression.

**Institutional racism:** (taken from the racial equity toolkit.) Organizational programs, policies or procedures that work to the benefit of white people and to the detriment of people of color, usually unintentionally or inadvertently.

**OCR:** “Office for Civil Rights.”

**Opportunity areas:** (taken from the racial equity toolkit.) One of seven issue areas the City of Seattle is working on in partnership with the community to eliminate racial disparities and create racial equity. They include: education, health, community development, criminal justice, jobs, housing, and the environment.

**Racial equity:** (taken from the racial equity toolkit.) When social, economic and political opportunities are not predicted based upon a person’s race.

**Racial inequity:** (taken from the racial equity toolkit.) When a person’s race can predict their social, economic, and political opportunities and outcomes.

**RET:** “racial equity toolkit”

**Seattle neighborhoods:** (taken from the racial equity toolkit neighborhood.) Boundaries defined for the purpose of understanding geographic areas in Seattle.

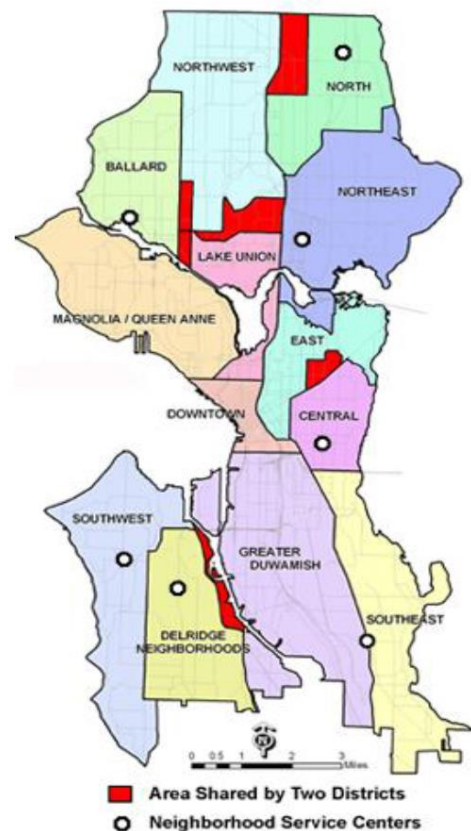
**Stakeholders:** (taken from the racial equity toolkit.) Those impacted by proposed policy, program, or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ethnic groups, other institutions like Seattle housing authority, schools, community-based organizations, change teams, City employees, unions, etc.

**Structural racism:** (taken from the racial equity toolkit.) The interplay of policies, practices and programs of multiple institutions which leads to adverse outcomes and conditions for communities of color compared to white communities that occurs within the context of racialized historical and cultural conditions.

**Surveillance ordinance:** Seattle City Council passed ordinance [125376](#), also referred to as the “surveillance ordinance.”

**SIR:** “surveillance impact report”, a document which captures the fulfillment of the Council-defined surveillance technology review process, as required by ordinance [125376](#).

**Workforce equity:** (taken from the racial equity toolkit.) Ensure the City's workforce diversity reflects the diversity of Seattle.



## **Appendix B: Public Comment Period (6/03/25 to 6/23/25)**

## CCTV 2025 Material Change, public comment received via Privacy Inbox

June 23rd, 2025

Dear Seattle City Leadership,

Here is my public comment on the SPD Real-Time Crime Center (RTCC) Surveillance Impact Report (SIR) currently going through the Material Update process.

I've provided my concerns and recommendations below in order of severity. You will find that the negatives far exceed any possible positives and as such **my overall recommendation is that the City of Seattle not deploy a RTCC and all the material updates to the system should be rescinded.**

### Concerns & Recommendations:

1) Reactive, not preventative: SPD is misleading the public by calling this a "Technology Assisted Crime Prevention Pilot". This not a pilot and the SPD RTCC contains data from on-going and historical crime incidents, so by it's very nature will be reactive (911 calls, etc). SPD even says in item 1.1 of the RTCC SIR that the "purpose of RTCC software is to provide situational awareness to ... reactively investigate incidents." The RTCC is not a crime prevention tool and mislabeling it as such diverts consideration away from truly preventative measures, which are not technology driven - and that is true for both community-oriented measures (like after-school programs, rehabilitation, workforce training, etc) and police/policy-driven measures (such as gun lock boxes, gun buy-back programs, requiring reporting of lost/stolen guns, trigger locks, etc).

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed) - effort should instead be placed on actual crime prevention measures.

2) Meager efficacy: The low effectiveness does not outweigh the high monetary cost + significant privacy/civil liberties risks:

- (a) The 2024 paper by Rachael Arietti (of City University of New York) titled "Do real-time crime centers improve case clearance? An examination of Chicago's strategic decision support centers" [ <https://doi.org/10.1016/j.jcrimjus.2023.102145> ], which SPD referenced in the RTCC SIR, shows that RTCCs deployed in Chicago had the largest effect (which was still modest) for property crime clearance. However, in item 5.1 of the RET inside the RTCC SIR, SPD says the number one goal of the project is "Reduction in gun violence, human trafficking, and other persistent felony crimes in the pilot area." This goal is out of alignment with what RTCCs are shown to achieve. Specifically, the paper said that RTCCs "appeared to have a relatively smaller impact on violent crime clearance (5% increase)" [Arietti page 6]
- (b) Other studies have also shown minimal to no effect of RTCCs on violent crime. For example, the 2019 paper by Christopher Koper (of George Mason University) and et. al. titled "Evaluation of the Milwaukee Police Department's Crime Gun Intelligence Center" [ [https://crimegunintelcenters.org/wp-content/uploads/2019/10/MPD-CGIC-Evaluation-2019\\_Final-Report.pdf](https://crimegunintelcenters.org/wp-content/uploads/2019/10/MPD-CGIC-Evaluation-2019_Final-Report.pdf) ] found "In general, there were no upward trends in the percentage of incidents cleared during the post-[RTCC] period (2014-2017) for any of the offense types" [Koper pdf page 36].
- (c) Overall, the results from studies assessing the use of technology on crime clearances has been mixed; whereas other (non-technological) aspects have been shown to have a greater impact on case clearances. For example, the 2021 paper by Heather Prince (of George Mason University) and et. al. titled "Effective police investigative practices: an evidence-assessment of the

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research" [ <http://dx.doi.org/10.1108/PIJPSM-04-2021-0054> ] states "newer research findings suggest that investigations-specific organizational policies focused on strengthening the capacity and accountability of investigative work, applying targeted resources to investigations, and increasing investigative effort in developing witnesses, evidence and responding to crime scenes could improve an agency's ability to affect clearance rates" [Prince pdf page 15] So it would be a better use of SPD's time and taxpayer's money to pursue these non-technological improvements that have shown measurable improvements in crime clearances.

- (d) SPD already has had a RTCC (iBase) since 2015. If RTCCs were effective at helping clear cases, then that should already be evident in SPD's existing data (such as, mean time to suspect identification before vs after 2015, mean length of time to case clearance before vs after 2015, etc). Since SPD didn't provide such data, the public can only assume that the data SPD does have doesn't look promising regarding the use of a RTCC. Additionally, in item 1.1 of the RTCC, SPD said that a RTCC "helps reduce unnecessary stops by officers, focusing their efforts on verified locations and accurate descriptions." So how many unnecessary stops did SPD conduct before vs after 2015? Moreover, how does the RTCC change the accuracy of suspect descriptions and how is that shown in SPD's data before vs after 2015?

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed) - there is no point to deploying an ineffective technology.

3) **Expensive:** This is a poor use of taxpayer money and even of the SPD budget itself. It's also highly likely to be a ballooning amount of money year-over-year, beyond what the SIR implies:

- (a) Looking at four other US cities that have deployed RTCCs and for which their cost information is publicly accessible, the average cost is \$7.16 per person (that is, per person based on the population data from each city's 2020 Census). With Seattle's 2020 population of 737,015, this would put the full-scale (post-pilot-phase) RTCC deployment by SPD in the ballpark of \$5.3 million, not including the additional costs for the CCTV and ALPR expansions.
- (b) Even the paper referenced by SPD in the SIR mentions the "substantial costs associated with RTCCs, with initial costs ranging between several hundred thousand dollars to \$11 million ... This does not include the costs of ongoing maintenance, technology, and personnel" [Arietti page 1]. The paper later goes on to list the costs specific to Chicago's RTCC as "about \$10.6 million, plus an additional \$600,000 annually" [Arietti page 4].
- (c) The Fiscal Impact section of the RTCC SIR is lacking any data regarding the expected year-over-year costs for powering the RTCC equipment, staffing the RTCC room, bandwidth & data storage costs, the on-going subscription to the vendor's software & support package, and projected maintenance costs. Given the budget deficit the City is facing, it is unwise for the City to spend likely well over \$1.8 million dollars to surveil residents instead of providing social services and funding community-driven, proven solutions to reducing gun violence.
- (d) This seems like a foot in the door for SPD to have an always ever increasing budget allocated to them to expand and deepen their surveillance. It will be a contract that is an investment in exceptionally costly, ineffective, reactive measures that are hard to remove and do nothing to actually help residents or reduce violence.
- (e) SPD says that this will replace their existing RTCC (iBase). However, SPD also uses iBase for other functionality (link analysis, which was the only approved use of iBase under the Surveillance Ordinance). This means that there will continue to be on-going costs for both iBase and the RTCC (Fusus). This is yet another way that SPD's expenditures will continue to balloon.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed) - there are better uses of limited City funds.

4) Racially-biased deployment: The Racial Equity Toolkit (RET) included inside the SIR hasn't been updated to reflect the additional locations added to be surveilled. The old RET is now rather inaccurate since it doesn't include a map of the SDOT traffic camera locations or the proposed additional SPD CCTV locations and item 1.4.2 still says "CCTV will be deployed where crimes related to gun violence, human trafficking, and other persistent felony crimes are concentrated" which is no longer true because SDOT traffic cameras are all over the city and their placement is not related to felony crimes. This is on top of the many issues with the original RET itself:

- (a) The RET doesn't appear have been drafted in consult with the Office of Civil Rights, as required by City Council.
- (b) RET item 1.4.1 in the SIR shows disparate impact in the locations chosen to be surveilled. Specifically, there is disproportionate impact on Native American residents in 4 out of 4 of the pilot locations, Black residents in 3 of the pilot locations, Asian & Latinx residents in 2 of the pilot locations, and Mixed folks in 1 of the pilot locations. Additionally, while the majority of Seattle residents are white, all of the pilot locations have an under-proportionate amount of white residents - thus meaning the pilot locations selected appear on paper to be racially motivated. I don't see how the impact won't be biased-based policing because if you are only looking for crime in non-white neighborhoods, then you're primarily going to find non-white suspects (and victims); whereas criminals in white neighborhoods (who are therefore likely white themselves) will fly under the radar of the police.
- (c) RET item 1.4.2 in the SIRs states, "This technology does not enhance the risks of racial or ethnicity-based bias." SPD has not provided any explanation as to how deploying this technology in racially-biased locations won't generate racially-biased policing outcomes.
- (d) This is made worse by SPD's response to the RET question asking how they will mitigate the risks for racial bias in the deployment and SPD answered that these technologies "will record people who choose to be in a public place where the technologies are being used. This mitigating factor reduces, to an extent, the possible disparate impact of potential police actions." So SPD is basically saying that residents can avoid SPD police biases (and invasion of their privacy) by not going outside in public - you need to stay home if you don't want to be surveilled - that it's up to residents to protect themselves against SPD biases.
- (e) Only 1 of the 2 public engagement meetings on these surveillance technologies was held near a pilot location and the 1 location that was also happened to be the location with the highest amount of white residents out of the 4 pilot locations. Why can SPD find the time to talk to surveillance technology vendors and the City can find the money to surveil residents, but somehow doesn't have the time nor the money to even have host a community event in all of the pilot locations?

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed) - racist behavior (including with technology) has no place in Seattle.

5) Enabling circumvention of Seattle & WA state laws: Women, trans folks, and immigrant residents are placed in increased harm by SPD's proposed RTCC:

- (a) For background, [WA HB 1469](#) was passed in 2023 and created a Shield Law in WA state (now under RCW 7.115). Among other things, the WA Shield Law prohibits WA state, local agencies, & law enforcement and WA-based companies & other private entities from providing

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- information to, complying with subpoenas, or cooperating with an outside state related to bans or bounty hunting that state might have related to reproductive or gender-affirming healthcare.
- (b) And WA SB 5497 was passed in 2019 and created the Keep Washington Working Act (now under multiple RCW sub-sections). Among other things, the Keep Washington Working Act restricts the extent to which local law enforcement agencies (such as SPD) may participate in enforcement of federal immigrant laws (such as by assisting ICE by collecting information about residents which may be undocumented).
  - (c) In item 2.3 of the RTCC SIR, SPD says that "Most RTCC vendors provide this service via cloud-based web applications..." and SPD has confirmed that the video recordings will be streamed and recorded in the cloud (not on-premise with the City of Seattle).
  - (d) Data stored off-premise (aka "in the cloud", "cloud-based", or "Software-as-a-Service", SaaS) is at risk of being subject to legal requests for that data directly from the platform provider by entities external to WA state. For example, a judge from Idaho could sign a subpoena/warrant that requests Axon Fusus (the proposed RTCC provider for SPD) to provide ALPR data for vehicles used by and/or CCTV recordings of people visiting Seattle who were suspected of having an abortion or assisting in providing trans healthcare. Or ICE could issue requests for ALPR and/or CCTV data specific to undocumented people that they believe might be in the Seattle area. Because Axon isn't a WA company, the data is not protected by the Shield Law; and because Fusus isn't a government law enforcement agency, the data is also not protected by the Keep WA Working Act.
  - (e) These risks to women, trans folks, and/or immigrants are so severe and tangible that as of April 2025, Nashville is no longer even considering deploying the very same tech that SPD has deployed (Axon Fusus): <https://nashvillebanner.com/2025/04/28/metro-nashville-fusus-freddie-oconnell/>
  - (f) The amendment that passed in Council that altered the contract language with Axon does not address these concerns either because state/federal laws will always be honored by a judge over simple contract language. Additionally, if the judge who signed the warrant also signed a gag order for those requests, then not only would SPD be unable to stop such information sharing but also Axon might be legally blocked from even disclosing that the request(s) exist to SPD (regardless of what the contract says).
  - (g) These concerns are especially relevant now given the current administration and because SPD has already mounted a camera within range of viewing people who visit the Planned Parenthood on 105th and the Home Depot on Aurora.
  - (h) SPD's existing RTCC (iBase) is on-premise, so it doesn't create these risks to residents.
- Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed) - SPD must not weaken state laws nor endanger women, trans folks, and immigrant residents. If City Council approves of this anyways, then at a minimum, require that the RTCC to be on-premise.
- 6) Illegal use of SDOT cameras: Adding SDOT's traffic monitoring cameras to the SPD RTCC would violate numerous sections of Ordinance 125936 (2019 SDOT CCTV & LPR SIRs).
- (a) Item 3.0 on page 150 of Ordinance 125936 states "The CCTV system and data shall be used only for traffic management purposes, except for when the City's Emergency Operations Center is activated to respond to an emergency or to monitor a major city-wide event, in which case the system may be used by other city personnel (e.g. Police and Fire). The system shall not be used for civil or criminal enforcement purposes." So it is illegal for SDOT cameras to be routinely & constantly used by SPD without an event happening. Moreover, this implies that video footage

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from the SDOT traffic monitoring cameras would not be admissible in court since it was illegally captured.

- (b) At least four other items (3.1, 4.3, 4.7, & 6.1) of Ordinance 125936 only lists users who will have access to FLIR Cameleon ITS and does not list any City departments that would have on-going use of the SDOT traffic camera video feeds outside of Cameleon, so the public and City Council did not consider nor assess this when passing Ordinance 125936.
- (c) Similar wording in items 3.3, 4.2, 5.1, & 7.2 of Ordinance 125936 state that "Video images will not be recorded, except for compelling traffic operational needs. If they are recorded, any such recordings will be destroyed immediately after use. Recordings shall not be stored or disseminated." So it is illegal for SPD to create and store recordings of the SDOT traffic camera feeds.
- (d) Similar wording in items 3.3, 4.0, 4.2, & 7.2 of Ordinance 125936 also state that "Operators may not intentionally use the CCTV cameras to discern any personally identifiable information that would enable the operators to identify a member of the public, unless doing so is necessary to allow the operator to perform a traffic management function." So the SDOT traffic camera feeds would not be of any investigative or evidentiary use to SPD anyways since they are not allowed to contain any personally identifiable information.
- (e) Items 4.0 & 4.1 on page 153 of Ordinance 125936 state that "The SDOT CCTV System will not be used to collect any data other than the following: • Live-streamed feed of current traffic conditions • Recorded video of traffic for engineering studies • Still images of traffic conditions used in training materials or included in social media." So both SPD's routine, continuous access to the SDOT traffic cameras and the creation of any recordings from them is illegal.
- (f) Similar wording in items 4.2, 4.7, 5.0, 5.3, 6.2, & 7.2 of Ordinance 125936 again limit the recordings to only traffic engineering studies and specify that the data retention period for those recordings is 10 days. So not only would SPD's use of the SDOT traffic cameras violate their purpose of use when recordings are made, but SPD would also violate the law if they stored the recordings for 30 days, as they currently plan to do so.
- (g) Items 6.0 & 6.1 on pages 159 - 160 of Ordinance 125936 states that users accessing the streams must be "notified that the system is intended to be used to monitor traffic and for no other purpose." So again, SPD's use of the SDOT traffic cameras would violate the SIR.
- (h) Additionally, multiple items in Ordinance 125936 would be inaccurate if the SDOT traffic cameras were added to the SPD RTCC: items 7.3, 7.4, & 8.1; the RET, and the Community Surveillance Working Group's Privacy & Civil Liberties Impact Assessment.

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed) - SPD must not violate local laws, including the requirements laid out in any Surveillance Impact Report signed by the Mayor.

7) Surveillance expansion: RTCC SIR item 2.3 states that "Some RTCC vendors produce hardware that allows for private camera owners (such as private businesses) to share specific camera feeds with agencies." There are multiple concerns about this:

- (a) CCTV recordings from nearby business are already being used and leveraged by SPD during investigations, so continuously, on-going access to live video feeds from private entities is unnecessary.
- (b) SPD would have no control over technically ensuring that only camera feeds that are of publicly accessible areas are shared with SPD. For example, a business with multiple camera feeds may not consider that certain cameras the business has should not have their feeds shared with SPD since the viewing range includes non-public-facing locations. This could result in even further

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invasion of privacy beyond which even a reasonable judge would have granted outside the confines of specific time duration as part of a targeted investigation - thus elevating the surveillance ability of SPD beyond the oversight of the judicial branch.

- (c) SPD would have no control over when or where various private video feeds are added or removed from the system; nor would SPD have control over whether the video feeds have on-the-fly AI-generated overlays within the video stream content itself before the feed is made available to SPD - thus elevating the surveillance ability of SPD beyond both public scrutiny and the oversight supposedly enshrined via the Surveillance Ordinance (S.M.C. 14.18).

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, privately-owned CCTV videos (both live and recorded) should require a warrant signed by a judge before they can be viewed, accessed, or saved by SPD.

8) Hidden/unknowable surveillance features: In item 1.2 of the RTCC SIR, SPD says, "some RTCC software uses non-generative AI, such as object detection, to analyze those surveillance technologies" and in item 2.3, SPD says that they "will not use facial recognition technology. In addition, SPD would not use analytics available in some platforms that combine different data sources and use algorithms or AI to present trends." However, face recognition and predictive policing aren't the only concerns:

- (a) Gait recognition, behavior analysis, and emotion analysis would also be concerning functionalities that the system might have. None of those tools should be used on the data.
- (b) SPD hasn't confirmed that they will only use an RTCC that allows them to disable such features system-wide. This is important because without it, it relies on each individual using the RTCC not clicking the wrong buttons - meaning there is no technical guardrail; and past behavior from SPD has shown that individual employees are willing to violate both SPD Policy and the Surveillance Ordinance (i.e. [OPA Case 2020OPA-0305](#) and [OPA Case 2020OPA-0731](#)).
- (c) The vendor that SPD plans to use for the RTCC (Fusus) advertises that their system is "continuously evolving along with its database of profiles for search and analysis" and that Fusus is continuously updating the AI capabilities of the RTCC via weekly updates to the system. SPD has not disclosed to the public what are all the edge-based capabilities are they want to use. Not only that but SPD won't even know beforehand what are all the capabilities this system will have even after it's live and in-use (for possibly years). New features can and will be added to the RTCC both without SPD's awareness and without any public oversight or control - thus (again) elevating the surveillance ability of SPD beyond both public scrutiny and the oversight supposedly enshrined via the Surveillance Ordinance (S.M.C. 14.18).
- (d) In item 6.5 of the RTCC SIR, SPD didn't mention any accuracy checks they were planning to perform of the AI capabilities of the RTCC. So it seems SPD expects both the City and the public to just trust whatever functionality the vendor provides - without any checks-and-balances on that.
- (e) Moreover, even SPD themselves doesn't want automated assessment of their own videos, so why should residents be subjected to surveillance tools that even SPD doesn't like?  
<https://www.seattletimes.com/seattle-news/law-justice/decision-to-halt-program-analyzing-seattle-police-bodycam-video-under-scrutiny/>

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, all edge-based analytics and/or AI capabilities in the RTCC must be disabled until SPD explicitly lists them individually in the SIR during an open public comment period and then receives approval to use them from City Council.

9) No limitations on use: Item 5.1 of the RET in the RTCC SIR says the number one goal for the project is "Reduction in gun violence, human trafficking, and other persistent felony crimes in the pilot area." However, nothing in the SIR limits the use of the RTCC to only "felony crimes". This is a bait-and-switch tactic whereby SPD is using the public's fear of the scariest sounding crimes to justify a surveillance technology that in practice will have unlimited use and very likely will instead commonly be used to harass those most often on-foot (poor folks, sex workers, homeless, tweens/minors, etc). Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, specify that the only allowable use of the RTCC is for felony crimes.

10) Unidentified data sources: In item 4.1 of the RTCC SIR, SPD lists the data sources to the RTCC and closes with "and other information systems." This wording leaves open the door for future data integrations to the RTCC to be configured but never go through the Surveillance Ordinance process. For example, SPD could add social media data/analysis to the RTCC and that would not generate a new or updated SIR. No department should be above the scope of the Ordinance. Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, strike "and other information systems" from item 4.1 of the SIR.

11) Excessive data retention: In item 4.2 of the RTCC SIR, SPD says that "Data that is not part of a criminal investigation will be subject to a 30-day retention policy..." This has multiple issues:

- (a) 30 days is too long to keep data on innocent people just going about their day.
- (b) Retaining the RTCC data (which includes ALPR and CCTV data) for such a long period of time enables stalkers to issue Public Records Act (PRA) requests (potentially repeatedly) for data to use against their victims.
- (c) It also means that bounty hunters from states outside of WA can use the PRA request process to get access to RTCC data without needing to issue a warrant. This is yet another way this group of pilot technologies enables outside jurisdictions to get around our Shield Law, which is meant to protect people coming to WA state for reproductive or gender-affirming care.
- (d) And it means that ICE can also use the PRA request process to get around Seattle's Sanctuary City policy, which was meant to protect our immigrant residents.
- (e) Meanwhile, SPD will have to pay the storage costs for all that unneeded, excessive data.
- (f) It should not take SPD 30 days to figure out if a crime occurred at a given location. The SPD CAD and RMS data should be sufficient to somewhat quickly determine if a crime occurred (like say 48 hours, which is the data retention period requested by the Community Surveillance Working Group and City Council for SPD ALPR data, which would be getting processed by the RTCC).

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, limit data retention period to 48 hours for data not exported as evidence.

12) Duplication causing confusion in an emergency: Item 2.3 of the RTCC SIR, says "Some RTCC software vendors also include public-facing features such as notification software that allows an agency to push out real-time information to the public in the form of texts for those who opt-in. These functions are like Alert Seattle..." Seattle already has an opt-in alert notification system (AlertSeattle - <https://alert.seattle.gov/>). Having two separate systems that perform overlapping functionality of

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notifying residents in the case of an emergency is a bad idea because it could result in residents believing that they are subscribed for all emergency alerts when they are only subscribed to SPD's RTCC-based alerting system. If there is a non-SPD emergency, residents won't receive the alert because they are subscribed to the wrong system. There should be only one emergency alert system used by the City of Seattle and it should be whatever system the City's Office of Emergency Management officially designates as such. All city departments should feed their alert data to the OEM-designated system (as is already the case).

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, the public alert notification feature of the RTCC must be disabled.

### 13) Security & Compliance:

- (a) Item 4.7 says, "Access to the systems/technology is limited to authorized personnel via password-protected login credentials." It would be better if access wasn't just password-based, but was also using MFA/2FA (or even 2SA would be something).
- (b) SPD has also not detailed whether a person must be on the SPD network in order to access the RTCC or if remote access will be permitted.
- (c) SPD hasn't confirmed whether the RTCC will have granular access control.
- (d) Nor whether the RTCC logs the username and timestamp when a camera's pan, tilt, or zoom are changed; or when an ALPR search is conducted. For example, if the system does NOT log this and there was a news report about misuse of the RTCC, then it might be impossible for the OIG/OPA to determine which employee was at fault.
- (e) Item 5.4 in the SIR says that, "Unit supervisors are responsible for ensuring compliance with data retention requirements within SPD"; but that doesn't make sense here. Wouldn't this mean that the unit supervisor for the homicide detectives and the supervisor for the gang unit (and so and so forth) would all each be responsible for ensuring data retention compliance of the RTCC? That responsibility should be more centralized so as to ensure consistency in application of compliance requirements for a potentially widely-used system like the RTCC.

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, require the RTCC to support: detailed logging for all features, Multi-Factor Authentication (MFA), and granular access control of any cameras.

14) Training: Item 3.3 of the RTCC SIR says, "Authorized personnel will receive training in the RTCC management system prior to authorization." and item 7.2 says, "SPD Policy 12.050 mandates that all SPD employees receive Security Awareness Training (Level 2), and all employees also receive City Privacy Training." SPD does not mention creating any privacy or ethics training specific to the RTCC. There should be training that:

- (a) That RTCC features must never be used outside the scope of an active call or investigation; and that employees found to have used the RTCC outside that scope would be personally liable for their actions.
- (b) That ALPR data especially must be treated as sensitive information never to be used for personal purposes (such as stalking an ex/significant-other/neighbor/etc).
- (c) Advises that the cameras accessible via the RTCC must not have their pan/tilt/zoom altered to look inside private residences, to stalk/harass individuals, or to otherwise use the system for personal reasons)

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- (d) And that the cameras accessible via the RTCC must not have their camera's viewing angle moved away from an area of police response, while police are still present.
- (e) Additionally, the RTCC SIR doesn't mention any policy that prohibits the user of the RTCC from taking screenshots, screen-recordings, or pictures/recordings using their cell phone or other mobile device. This especially impacts any victims, passerby, or anyone in the vicinity who are only partially clothed or fully naked, especially if unconscious.

Recommendation: SPD must not deploy a RTCC (and certainly not implement any of the material updates proposed); but if City Council approves of this anyways, then at a minimum, require the creation & utilization of privacy & ethics training specific to the RTCC, including covering examples of expressly forbidden use of the system.

Please seriously consider my public comment. Thank you.

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From: Roxy Robles

Sent: Tuesday, June 24, 2025 1:10 PM

To: LEG\_CouncilMembers <[council@seattle.gov](mailto:council@seattle.gov)>; Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: NO TO EXPANDED SURVEILLANCE

Good afternoon,

I am writing as a resident concerned about increased surveillance in our city. These technologies were 'piloted' despite a huge amount of community dissent and after only three weeks of use. Three weeks is not nearly enough to pilot test a new technology and to gather information about its efficacy.

Not only does this raise concerns about the overuse and surveillance of already over-policed communities, this raises concerns about the council's ability to follow its own principle of 'good governance', with a consistent application of ethics, race and social justice principles, and data-driven results. I stand firmly against the additional use of surveillance technologies in our city a SPD is already unreliable, selectively responsive, and unbelievably brutal and racist.

SPD is constantly escalating situations, particularly with regard to people exercising their first amendment right to peaceful protest, and despite Shon Barnes' lip service to 'crime prevention' I have yet to see any marked change under his leadership. *We cannot continue to fund untested technologies for a brutal, racist, and unreliable police force!!!*

Roxy Robles [they/she](#)

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From: Brooke Christiansen

Sent: Monday, June 23, 2025 8:45 PM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material Update Public Comment

Hello, I'm a constituent out of Cap Hill (zip code 98122) and my comment is a follow:

Instead of investing in surveillance tech, let's invest in solving the root causes of crime in this city: high rent (unregulated landlords); limited access to shelter, mental health support, addiction support, job support for (formerly) unhoused folks, etc.; our tax money going to policing and sweeps that may make our neighborhoods temporarily look cleaner but don't solve people's problems; etc.

Best,

Brooke

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From: R. John Setzer

Sent: Friday, June 20, 2025 12:00 PM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material update public comment

With all due respect,

We don't need more surveillance in Seattle. This isn't a police state, and SPD cannot be trusted with that power.

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Sent: Sunday, June 22, 2025 9:19 AM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material Update public comment

Hello,

I am a constituent and a resident of north Seattle who thoroughly opposes expanding of citywide CCTV footage pilot program in the RTCC. More surveillance will NOT keep us safe. We need real programs and

funding for local community advocacy groups and schools instead of cameras to watch our comings and goings. Prioritize proaction instead of reaction!

N.Emery

She/her

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From: Jared Howe

Sent: Sunday, June 22, 2025 12:54 PM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: SIR Material Update public comment

Dear Seattle City Council,

I'm writing to express my strong opposition to the proposed expansion of CCTV surveillance in Seattle. This plan has moved forward without adequate public notification or transparency from City leadership, SPD, or local media—and the community deserves to be heard.

Research consistently shows that CCTV does not reduce violent crime or improve clearance rates. The SPD's own cited study—a 40-year meta-analysis—found *no significant impact on violent crime*.

Additional studies from the UK, Dallas, and elsewhere echo these findings, emphasizing the cost-ineffectiveness and lack of investigatory value.

Beyond its ineffectiveness, CCTV undermines civil liberties, particularly for marginalized communities. Surveillance has a documented history of abuse—from targeting protests and abortion seekers to racial profiling and stalking. Expanding camera networks only increases the risk of misuse, especially as they tie into facial recognition and other AI-driven surveillance tools.

Seattle already has community-centered initiatives that work. Programs like the Regional Peacekeepers Collective and the Rainier Beach Restorative Resolutions project have reduced violence significantly—and offer far better ROI than surveillance tech.

I urge you to oppose the expansion of CCTV and instead invest in evidence-based, community-led safety solutions. Our city's future depends on trust, transparency, and truly equitable public safety.

Sincerely,

Jared Howe

Seattle, WA

District 2

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From: Noel Rivard <[nrivard67@gmail.com](mailto:nrivard67@gmail.com)>

Sent: Sunday, June 22, 2025 10:44 AM

To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>

Subject: No to RTCC and CCTV!!!!

Cameras don't deter people or stop harm from happening, they are just for punishment. Call it what it is or get it out of my neighborhood.

The city's consideration of an off-premise real-time crime center software database is terrifying to me. Especially with the hell our federal administration is putting us through! Our state laws protect us to some degree, but the moving of our data to a third party removes those protections and threatens horrors unseen. PLEASE be diligent and push back in this.

Stop installing the tools for them to surveil and punish!! Get more creative. Do better for our city.

Punishment doesn't stop harm from occurring. Get to the root problem. What other pathways could actually prevent this behavior?

I urge you to reconsider for our sake and yours because you live here too. The people their illegally detaining and deporting right now are also your neighbors. History proves, that what we allow to happen

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

to them, will eventually happen to us.  
Noel Rivard (they/them)

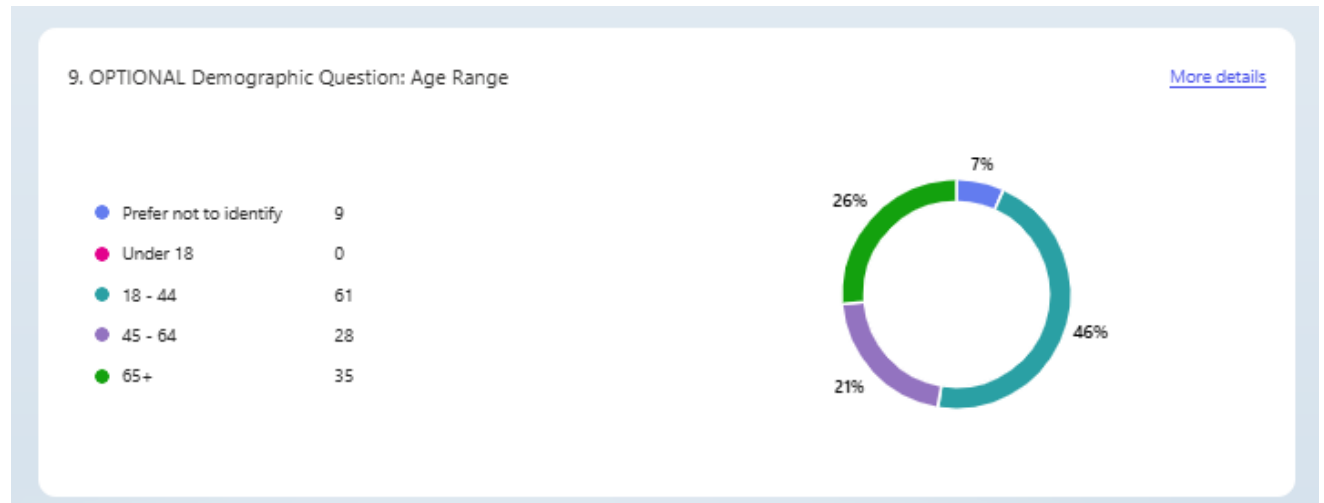
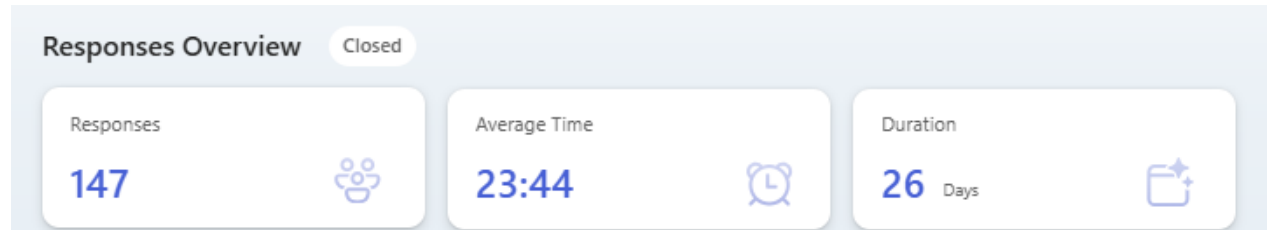
---

From: Siobhan Hopp  
Sent: Friday, June 20, 2025 8:45 AM  
To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>  
Subject: SIR material updates public comment  
NO expansion of surveillance! DO NOT give more data to SPD. SPD is violent, racially profiles, protects capital over people, and aids and abets ICE in kidnapping members of my community. They should be being given LESS power and LESS access, not more. I say NO to SDOT giving SPD access to more cameras!

---

From: Joelle Pretty  
Sent: Wednesday, June 18, 2025 6:35 PM  
To: Privacy <[Privacy@seattle.gov](mailto:Privacy@seattle.gov)>; LEG\_CouncilMembers <[council@seattle.gov](mailto:council@seattle.gov)>  
Subject: SIR Material Update public comment  
CCTV will NOT reduce violent crime or aid in police investigations  
CCTV poses a threat to civil liberties  
Police control CCTV camera, the cameras see what the police want them to see  
RTCC is a threat to women, immigrants, those utilizing their first amendment rights to free speech. It also creates a system ripe for abuse and potential to violate ALL residents' First and Fourth Amendment Rights  
I am opposed to these systems, to the Mayor and City Council expanding surveillance, and any officials in Seattle, King County, and Washington State (frankly, in the country) to cooperating with ICE.  
KNOCK IT OFF  
Sincerely,  
Joelle Pretty, Seattle

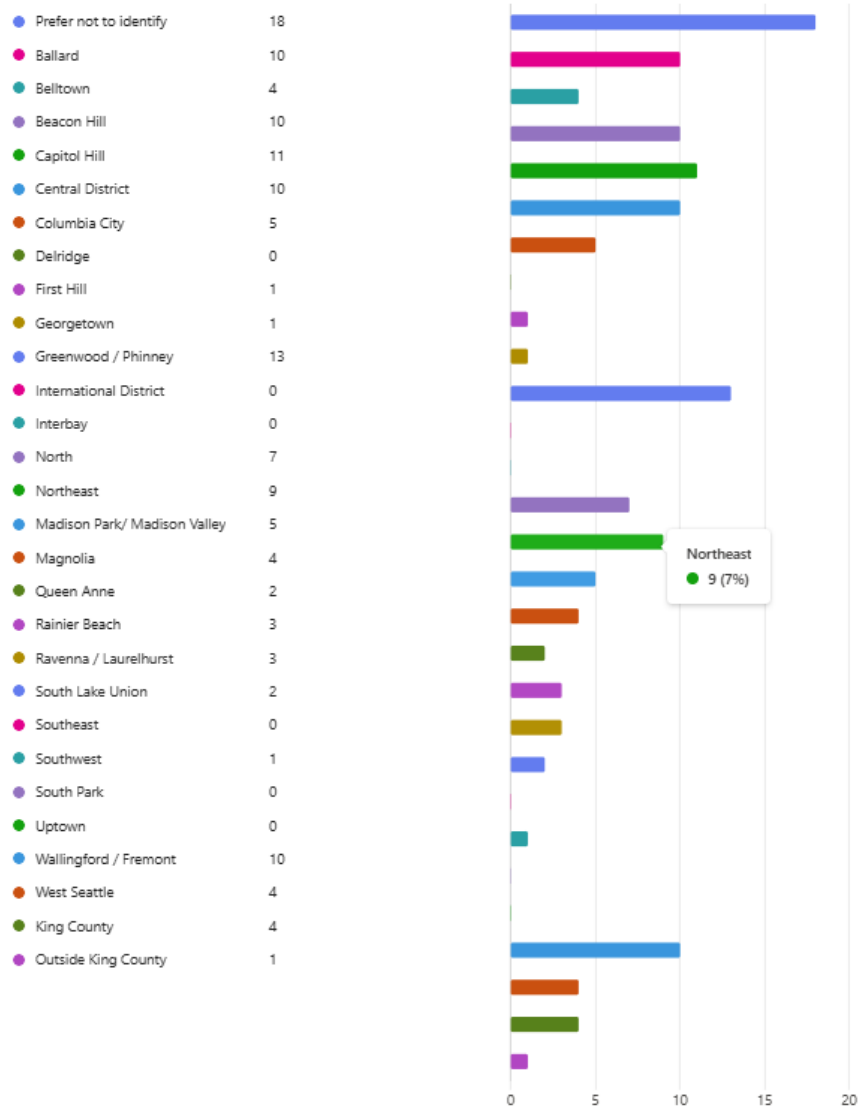
**Responses received via form:**



## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

### 10. OPTIONAL Demographic Question: Neighborhood

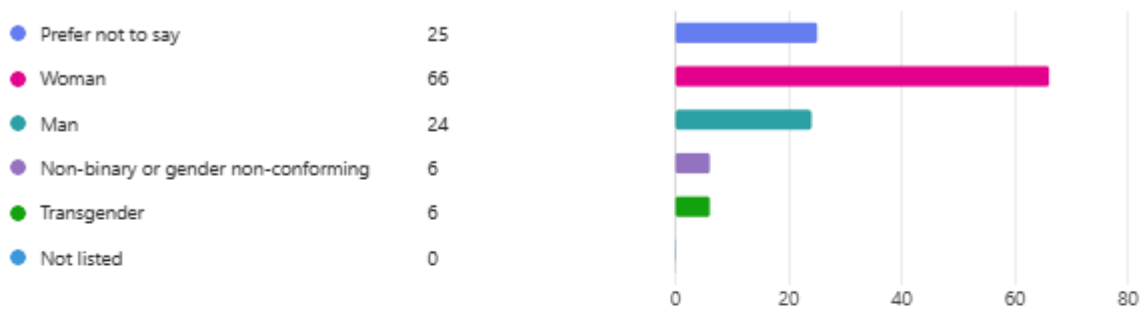
[More details](#)



## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

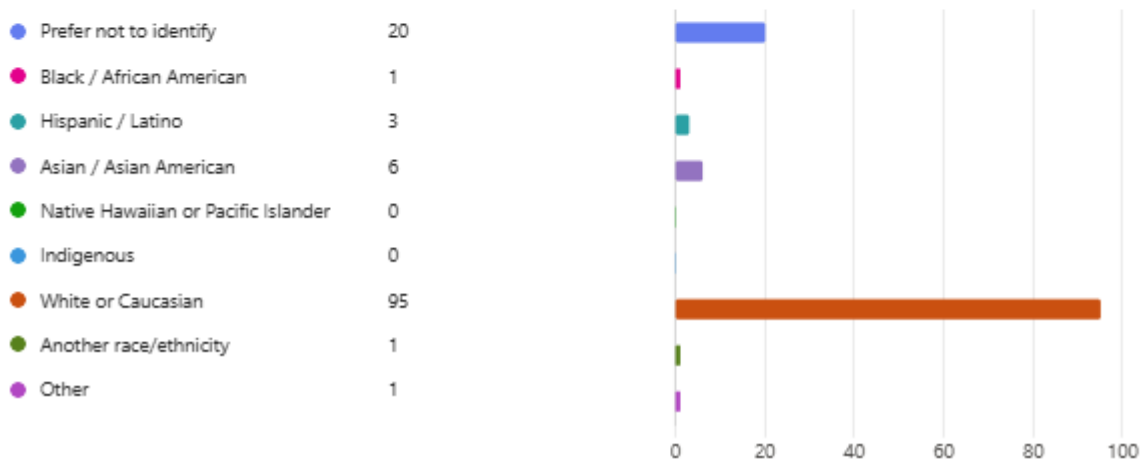
### 11. OPTIONAL Demographic Question: Gender

[More details](#)



### 12. OPTIONAL Demographic Question: Which race (s) / ethnicity (or ethnicities) do you identify as

[More details](#)



| What concerns, if any, do you have about the use of this technology? | Do you have any additional concerns about the use of technology (in case you ran out of space in section one) |  | Do you have additional comments/questions re what value do you see in this technology? | What would you want City leadership to consider when making a decision about the use of this technology? | Do you have additional comments/considerations that leadership should take into account when making a decision about this technology? | Do you have any additional comments or questions? |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|--|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
|                                                                      | What value, if any, do you see in the use of this technology?                                                 |  |                                                                                        |                                                                                                          |                                                                                                                                       |                                                   |
| 1 I oppose the use of this                                           | Bone                                                                                                          |  |                                                                                        | Do not expand the                                                                                        |                                                                                                                                       |                                                   |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|   |                                                                                                                                                                                                                                                      |                                                                                         |                                                                                                      |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
|   | technology as it increases the negative outcomes for LGBT+, BIPOC and immigrant communities and increases harmful surveillance in our city at a time when at all government levels surveillance is being used to harm many communities               |                                                                                         | use of the these cameras and discontinue using them                                                  |
|   | Surveillance tools only serve to help commit violence against marginalized groups. In the past few weeks Seattle has seen SPD collude with ICE, Tukwila PD collude with ICE, and these agents & officers have violated the constitution and abducted |                                                                                         | Consider how this surveillance technology is being used to target and hurt marginalized communities. |
| 2 | citizens.                                                                                                                                                                                                                                            |                                                                                         |                                                                                                      |
| 3 | Cloud hosting puts data at risk of breaches, threatening to expose people who                                                                                                                                                                        | RTCC can act as a license plate reader, and cloud based data storage would allow ICE to | Widespread access to spy on our community is not necessary and does not keep us safe.                |
|   |                                                                                                                                                                                                                                                      | None - it gives away our right to privacy and will be abused                            |                                                                                                      |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|----------------------------------------------------------------------------------------------------------------------------------------------|
|   | travel to WA for abortions or people escaping domestic violence                                                                                                                                                                                                                                                                                                                                           | surveil and harm immigrant communities                                                                                                                                                                                                                                                                                                                                                               |      | Engage the community and find what people need. Address root causes. Consider how those in power will use this data to harm innocent people. |
| 4 | Moving the on-premise RTCC database to an off-premise, cloud-hosted database exponentially risks people's personal information and their safety by exposing the RTCC information to access by any entity that can remotely access (whether authorized or not) the cloud-based database. Cloud-based software and databases are much more vulnerable to hacking than on-premise systems that have inherent | A remote RTCC database poses severe harms to vulnerable populations: Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. Homeless people, who have no option for privacy, are likely to become targets of mass surveillance. | none | city's legal liability when (not if) people's personal information is breached.                                                              |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| physical barriers to access.                                                                                                                                                                                                                                                                                | Customs and Border Control (CBC) and ICE can access the data directly, thereby circumventing Washington State Law. ICE has a history of accessing data directly from private surveillance companies that market their products to police, in order to circumvent state/local laws. |                                                                                                                                                                                                                                                                             |
| <p>We know that this technology disproportionately impacts homeless people, Black people, immigrants, and other communities that already have enough to deal with. Also, I don't trust these surveillance technologies. What are they really used for? What is done with the data they</p> <p>5 gather?</p> | None                                                                                                                                                                                                                                                                               | <p>I want to urge City leadership to use an equity lens when considering making such a decision. Who is most impacted and why? Whose rights are being violated, whether intentionally or unintentionally? What else could these funds/resources be used for, instead of</p> |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|   |                                                                                                                                                                                                            |                                                                                                                          |                                                                                                                           | surveilling people?                                                                                              |                                                                                                                 |                                                                                                      |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| 6 | A cloud-based RTCC would weaken state laws and endanger women, trans folks, and immigrant residents. This technology should not be based in the cloud or with a private third party.                       | No value. We have it already and do not need it managed by a private third party out side of Washington state control.   |                                                                                                                           | Do not use this technology it will be used to punish those seeking Healthcare in Washington.                     |                                                                                                                 |                                                                                                      |
| 7 | Lack of safeguards for the data being collected, invasion of privacy, and likelihood that these tools will be used to target already marginalized communities. This technology will not make us any safer. | None.                                                                                                                    |                                                                                                                           |                                                                                                                  |                                                                                                                 |                                                                                                      |
| 8 | SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being                                                                           | Threat of harm to all people exercising First Amendment Rights of free speech, public protest and assembly Seattle has a | No. Creates a system ripe for abuse and potential to violate all residents' First and Fourth Amendment Rights Cloud-based | Surveillance technology will NOT aid law enforcement in solving crime. The 2024 paper that SPD cites states that | There are MANY effective tools the city could use to decrease community violence Violence interruption programs | We're devolving into a state of authoritarianism. Do you want to be part of the problem or solution? |
|   |                                                                                                                                                                                                            |                                                                                                                          |                                                                                                                           |                                                                                                                  |                                                                                                                 | SPD is assisting ICE SPD confirmed to Guy Oron that they have been providing "mutual aid" to         |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents.                                                                                             | long history of participatory democracy dating at least as far back as the 1919 general strike. Seattle has seen mass protests for labor rights, abortion rights, anti-war protests, and protests around issues of international trade policies, and most recently mass demonstrations advocating for a ceasefire in Gaza. Unfortunately, police violence against protesters is not unprecedented. After SPD's betrayal of the public trust in the summer of 2020, the city recently paid a \$10M settlement. Violence against protestors in 2020 is one of the principal | software can be hacked. This happened in 2021 when hackers gained access to Verkada - giving them access to 150,000 cameras inside schools, hospitals, gyms, police stations, prisons, offices and women's health clinics RTCC software creates conditions that are ripe for police abuse, as it provides little, if any, oversight for how police use it, little documentation or auditable logs, and few transparency mechanisms. RTCC software like Fusus recruits a vast assortment of privately owned cameras that allow the company to | RTCC "appeared to have a relatively smaller impact on violent crime clearance (5% increase)," other studies of RTCC show no effect on violent crime clearance rates. In a 40 year systematic review with meta-analysis of the efficacy of CCTV the authors concluded there were "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." Only 1% to 0.2% of ALPR captured license plates are either on a hot list or associated with any crime. RTCC software is expensive RTCC | work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeeper's Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. Richmond, CA has chosen to invest in | ICE/Department of Homeland Security. SPD says its assistance dispersing community members so ICE can kidnap people doesn't violate the Keep Washington Working Act which bars local police from collaborating with ICE. Some of this "mutual aid" occurred while Interim Police Chief Shon Barnes was making the headline grabbing claim that he expects to go to jail because he won't cooperate with the Trump Administration. |
| Threat of harm to abortion and gender-affirming healthcare. Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. If SPD switches over to a cloud-hosted |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | SPD and Mayor Harrell refuse to respond to questions from Hard Pressed about how                                                                                                                                                                                                                                                                                                                                                 |

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| RTCC database, we enable the criminalization of those seeking reproductive care. The rate of out-of-state abortions, those coming from other states to seek abortion in Washington, increased by 36% in 2023 and included 20 different states including neighboring Idaho and states as far away as Texas and Alabama. Anti-abortion groups have a history of using license plate data. RTCC software allows data to be shared across law enforcement agencies. Third party agencies in anti-abortion states could use this data to criminally prosecute those seeking abortion in Washington state. | reasons that Seattle remains under the consent decree that it has been under for excessive use of force since 2012. SPD has used existing surveillance systems to spy on peaceful protestors. During the 2020 protests for racial justice, SPD used live video streaming to record peaceful protestors, and shared it with U.S. Marshalls, Washington State Department of Corrections, and to a private citizen volunteering at Seattle's emergency operations center (EOC). SPD has continued to use existing surveillance to spy on protestors including | bypass laws and restrictions that normally limit police, including viewing camera footage without a warrant or ongoing consent from the owner. The risk is not hypothetical as seen by other law enforcement agencies: In Pasco County, Florida, which operates an RTCC, the sheriff's office's predictive policing system encouraged officers to continuously monitor and harass residents for minor code violations such as missing mailbox numbers and overgrown grass. SPD has a track record of officers abusing their access to | software are subscription products meaning the city will have to pay for it every single year. RTCC software, and other companies selling subscriptions, operate on the land-and-expand strategy where it starts off small with a city to get its proverbial foot in the door and then increases the amount the city is buying from them every year. In other words, a for profit company will be pushing Seattle to spend even more money on its products every year. The city cannot afford this ineffective and expensive technology - especially in light of the fact that | violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime. Both violent crime and property crime can be reduced by community investments. Investments restoring vacant land and community non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes. Many communities across the | many times ICE has asked for data sharing. The only thing preventing ICE from accessing all of SPD's surveillance data (including 30 days of video and 90 days of license plate scans) is SPD's dubious claim that it will follow the Keep Washington Working Act & Washington Shield Law (read on for more info on how meaningless these assurances are) and won't cooperate with ICE. |
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| Recently an Idaho mother and son were charged with kidnapping for allegedly taking a minor across state lines to access abortion care in Oregon. The state of Texas has already attempted to get data from Seattle Children's Hospital for any Texas residents receiving gender-affirming care. As soon as SPD switches over to a cloud-hosted RTCC database, red states will start issuing subpoenas to access data directly from Fusus. Threat of harm to women, sexual assault and stalking survivors, and vulnerable marginalized community residents RTCC software | including one on Sept. 23, 2023, that called for justice for the death of Jaahnavi Kandula, who died Jan. 23, 2023, as a result of being hit by SPD officer Kevin Dave while driving his officer vehicle as she walked through a marked crosswalk. RTCC software is a vast network of cameras which can include doorbell cameras, drones, robots, fixed surveillance cameras, helicopters, hidden cameras, police body cameras, and cameras in schools and churches, among other settings. RTCC opens up the opportunity for those exercising dissent to be tracked and | surveillance technology. In 2021 SPD Officer Swartz used police data to stalk his ex-girlfriend; in 2020, an officer accessed confidential information about a domestic violence investigation and shared it with someone involved; and just last year, an officer performed an unauthorized search for personal reasons to reveal a citizen's firearm ownership. The privatization of policing represented by relying on private consumers to expand the camera network undermines democratic values, effectively excluding Seattle residents from being | Seattle is anticipating a \$250 million shortfall in 2025. Looking at four other US cities that have deployed RTCCs, the average cost is \$7.16 per person. With Seattle's 2020 population of 737,015, this would put the full-scale (post-pilot-phase) RTCC deployment by SPD in the ballpark of \$5.3 million, not including the additional costs for the CCTV and ALPR expansion. Even the paper referenced by SPD in the SIR mentions the "substantial costs associated with RTCCs, with initial costs ranging between several hundred thousand dollars to \$11 million". | country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community. Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities, and access to affordable housing. Poverty and income inequality are associated with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income |
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| companies like Fusus rely on private consumers to expand the camera network which gather enough data to reveal sensitive personal information, including where someone lives, works, and their religious affiliation. Individuals, homeowner associations, or businesses that opt into RTCC may be able to access the data directly from the vendor. Hostile individuals could access data to stalk or harass individuals. The threat to vulnerable communities is NOT hypothetical, as seen by the actions of other law enforcement agencies: NYP officers used mass surveillance | targeted, and risks the threat of police retaliation. Surveillance is about the power to watch and intervene in a variety of situations, whether criminal or not, and surveillance technology has the potential to have a chilling effect on free speech rights. In 2021 LAPD requested bulk camera data targeting Black Lives Matter protesters. In New York City there is evidence that NYPD has used surveillance technology to surveille Black Lives Matter protesters. Creates a system ripe for abuse and potential to violate all residents' First and Fourth | able to provide input and oversight on the growing Seattle surveillance apparatus. RTCC software like Fusus continually adds new image recognition algorithms and integrations with third-party applications via the software's AI capabilities. This continuous introduction of new and unvetted surveillance tools would be in violation of Seattle's Surveillance Ordinance. | support has been found to reduce firearm violence. Opening libraries and expanding library hours both reduce violence and property crimes. |
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technology to  
record and  
monitor  
everyone  
parked in  
front of a  
mosque, and  
Birmingham  
police also  
used this  
technology, in  
conjunction  
with other  
tools, to track  
Muslim  
residents.  
Homeless  
residents,  
who have no  
option for  
privacy, are  
likely to  
become  
targets of  
mass  
surveillance.  
California is  
using AI to  
identify and  
target its  
homeless  
residents.  
Threat of  
harm to  
immigrants  
ICE has a  
history of  
terrorizing  
immigrant  
communities.  
Jurisdictions  
that do not  
use local  
resources to  
enforce  
federal  
immigration  
laws have  
lower rates of  
crime,

Amendment  
Rights  
Cloud-based  
software can  
be hacked.  
This  
happened in  
2021 when  
hackers  
gained  
access to  
Verkada -  
giving them  
access to  
150,000  
cameras  
inside  
schools,  
hospitals,  
gyms, police  
stations,  
prisons,  
offices and  
women's  
health clinics  
RTCC  
software  
creates  
conditions  
that are ripe  
for police  
abuse, as it  
provides  
little, if any,  
oversight for  
how police  
use it, little  
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on or  
auditable  
logs, and few  
transparency  
mechanisms.  
RTCC  
software like  
Fusus  
recruits a vast  
assortment of  
privately  
owned

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

poverty, and unemployment than those that chose to collaborate. It was with this knowledge that the Keep Washington Working Act was passed to prevent data sharing between immigration and local law enforcement. RTCC software like Fusus can turn any camera into an automated license plate readers (ALPRs). By moving to a cloud-based platform, Customs and Border Control (CBC) and ICE can access automated license plate reader data directly; circumventing Washington State Law. ICE has a practice of accessing data directly from private ALPR surveillance companies

cameras that allow the company to bypass laws and restrictions that normally limit police, including viewing camera footage without a warrant or ongoing consent from the owner. The risk is not hypothetical as seen by other law enforcement agencies: In Pasco County, Florida, which operates an RTCC, the sheriff's office's predictive policing system encouraged officers to continuously monitor and harass residents for minor code violations such as missing mailbox numbers and overgrown grass.

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that market  
their  
products to  
police, in  
order to  
circumvent  
any local  
sanctuary  
laws. The  
department  
gets a lot of  
use out of  
this data, as  
seen by them  
running  
thousands of  
searches of  
ALPR  
databases in  
a single  
month as  
early as 2019.  
ICE's  
utilization of  
this data  
shows the  
degree of risk  
it poses to  
vulnerable  
communities.  
Police  
surveillance  
systems have  
been used by  
ICE and to  
target people  
seeking  
abortion  
healthcare  
even in  
sanctuary  
states

The Burner  
and Notes  
from the  
Emerald City  
have details

|   |                  |                |    |                       |                       |                   |                   |
|---|------------------|----------------|----|-----------------------|-----------------------|-------------------|-------------------|
| 9 | RTCC software is | There are MANY | no | Creates a system ripe | Threat of harm to all | Threat of harm to | Threat of harm to |
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| expensive RTCC software are subscription products meaning the city will have to pay for it every single year. RTCC software, and other companies selling subscriptions, operate on the land-and-expand strategy where it starts off small with a city to get its proverbial foot in the door and then increases the amount the city is buying from them every year. In other words, a for profit company will be pushing Seattle to spend even more money on its products every year. The city cannot afford this ineffective and expensive technology - especially in | effective tools the city could use to decrease community violence. Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced | Surveillance technology will NOT aid law enforcement in solving crime. The 2024 paper that SPD cites states that RTCC "appeared to have a relatively smaller impact on violent crime clearance (5% increase)," other studies of RTCC show no effect on violent crime clearance rates. In a 40 year systematic review with meta-analysis of the efficacy of CCTV the authors concluded there were "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." Only 1% to | for abuse and potential to violate all residents' First and Fourth Amendment Rights. Cloud-based software can be hacked. This happened in 2021 when hackers gained access to Verkada - giving them access to 150,000 cameras inside schools, hospitals, gyms, police stations, prisons, offices and women's health clinics RTCC software creates conditions that are ripe for police abuse, as it provides little, if any, oversight for how police use it, little documentation or auditable logs, and few transparency mechanisms. RTCC | people exercising First Amendment Rights of free speech, public protest and assembly. Seattle has a long history of participatory democracy dating at least as far back as the 1919 general strike. Seattle has seen mass protests for labor rights, abortion rights, anti-war protests, and protests around issues of international trade policies, and most recently mass demonstrations advocating for a ceasefire in Gaza. Unfortunately, police violence against protesters is not unprecedented. After SPD's betrayal of the public trust in the summer of | immigrants ICE has a history of terrorizing immigrant communities. Jurisdictions that do not use local resources to enforce federal immigration laws have lower rates of crime, poverty, and unemployment than those that chose to collaborate. It was with this knowledge that the Keep Washington Working Act was passed to prevent data sharing between immigration and local law enforcement. RTCC software like Fusus can turn any camera into an automated license plate readers (ALPRs). By moving to a cloud-based platform, Customs and Border Control (CBC) and ICE can | women, sexual assault and stalking survivors, and vulnerable marginalized community residents RTCC software companies like Fusus rely on private consumers to expand the camera network which gather enough data to reveal sensitive personal information, including where someone lives, works, and their religious affiliation. Individuals, homeowner associations, or businesses that opt into RTCC may be able to access the data directly from the vendor. Hostile individuals could access data to stalk or harass individuals. The threat to vulnerable |
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| light of the fact that Seattle is anticipating a \$250 million shortfall in 2025. Looking at four other US cities that have deployed RTCCs, the average cost is \$7.16 per person. With Seattle's 2020 population of 737,015, this would put the full-scale (post-pilot-phase) RTCC deployment by SPD in the ballpark of \$5.3 million, not including the additional costs for the CCTV and ALPR expansion. Even the paper referenced by SPD in the SIR mentions the "substantial costs associated with RTCCs, with initial costs ranging between several hundred thousand | violence in the Rainier Beach neighborhood by 33%. Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime. Both violent crime and property crime can be reduced by community investments restoring vacant land and community non-profits that tackle violence and build community | 0.2% of ALPR captured license plates are either on a hot list or associated with any crime. | software like Fusus recruits a vast assortment of privately owned cameras that allow the company to bypass laws and restrictions that normally limit police, including viewing camera footage without a warrant or ongoing consent from the owner. The risk is not hypothetical as seen by other law enforcement agencies: In Pasco County, Florida, which operates an RTCC, the sheriff's office's predictive policing system encouraged officers to continuously monitor and harass residents for minor code violations such as missing | 2020, the city recently paid a \$10M settlement. Violence against protestors in 2020 is one of the principal reasons that Seattle remains under the consent decree that it has been under for excessive use of force since 2012. SPD has used existing surveillance systems to spy on peaceful protestors. During the 2020 protests for racial justice, SPD used live video streaming to record peaceful protestors, and shared it with U.S. Marshalls, Washington State Department of Corrections, and to a private citizen volunteering at Seattle's emergency | access automated license plate reader data directly; circumventing Washington State Law. ICE has a practice of accessing data directly from private ALPR surveillance companies that market their products to police, in order to circumvent any local sanctuary laws. The department gets a lot of use out of this data, as seen by them running thousands of searches of ALPR databases in a single month as early as 2019. ICE's utilization of this data shows the degree of risk it poses to vulnerable communities. | communities is NOT hypothetical, as seen by the actions of other law enforcement agencies: NYP officers used mass surveillance technology to record and monitor everyone parked in front of a mosque, and Birmingham police also used this technology, in conjunction with other tools, to track Muslim residents. Homeless residents, who have no option for privacy, are likely to become targets of mass surveillance. California is using AI to identify and target its homeless residents. |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| dollars to \$11 million”. | lead to reductions in both violent crime and property crimes. Many communities across the country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community. Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities, and access to affordable housing. Poverty and income inequality are associated with violence, especially assault and homicide. Inequality predicts homicides | mailbox numbers and overgrown grass. SPD has a track record of officers abusing their access to surveillance technology. In 2021 SPD Officer Swartz used police data to stalk his ex-girlfriend; in 2020, an officer accessed confidential information about a domestic violence investigation and shared it with someone involved; and just last year, an officer performed an unauthorized search for personal reasons to reveal a citizen’s firearm ownership. The privatization of policing represented by relying on private consumers to expand the camera | operations center (EOC). SPD has continued to use existing surveillance to spy on protestors including one on Sept. 23, 2023, that called for justice for the death of Jaahnavi Kandula, who died Jan. 23, 2023, as a result of being hit by SPD officer Kevin Dave while driving his officer vehicle as she walked through a marked crosswalk. RTCC software is a vast network of cameras which can include doorbell cameras, drones, robots, fixed surveillance cameras, helicopters, hidden cameras, police body cameras, and cameras in schools and churches, |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence. Opening libraries and expanding library hours both reduce violence and property crimes.

network undermines democratic values, effectively excluding Seattle residents from being able to provide input and oversight on the growing Seattle surveillance apparatus. RTCC software like Fusus continually adds new image recognition algorithms and integrations with third-party applications via the software's AI capabilities. This continuous introduction of new and unvetted surveillance tools would be in violation of Seattle's Surveillance Ordinance.

among other settings. RTCC opens up the opportunity for those exercising dissent to be tracked and targeted, and risks the threat of police retaliation. Surveillance is about the power to watch and intervene in a variety of situations, whether criminal or not, and surveillance technology has the potential to have a chilling effect on free speech rights. In 2021 LAPD requested bulk camera data targeting Black Lives Matter protesters. In New York City there is evidence that NYPD has used surveillance technology to surveil Black Lives

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|   |                                                                                                                                                                                                                     |                                     | Matter protesters.                                                                                                                                                                             |                                                                                    |
|   |                                                                                                                                                                                                                     |                                     | stop trying to put us under constant surveillance and fix the homeless and housing crisis with social safety nets, higher ages and taxing the rich                                             | Yeah, you;re ruining the city because you won't tax the rich and help the homeless |
| 1 | spend money on socials safety nets instead of surveillance                                                                                                                                                          | zero                                |                                                                                                                                                                                                |                                                                                    |
| 1 | Establishing a penopticon to monitor citizens is the height of autocratic dystopia. It will has already been used to target LGBTQIA+, minorities, and those seeking abortions.                                      | None.                               | Eliminate it in its entirety. Redistribute the police budget to transit and climate resilience.                                                                                                | Here's your chance to be on the right side of history, or be just more autocrats.  |
| 1 | I worry that the data gathered by these cameras will end up sold to and/or held by private corporations, further invading our privacy as private individuals. With a move to cloud-based RTCC, these violations are | None, SPD already have onsite RTCC. | Do you trust any of the private corporations who may have an interest in this data to use it responsibly? What is the benefit to residents to move to cloud as opposed to the existing system? |                                                                                    |

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basically  
assured.  
Moving RTCC  
offsite opens  
up data  
security risks  
and would  
enable other  
states to  
circumvent  
our Shield  
Law and Keep  
WA Working  
Act, which  
exist to  
protect  
people  
seeking  
reproductive  
healthcare  
and  
immigrant  
workers. SPD  
already have  
an RTCC, and  
have already  
used it to  
abuse Seattle  
residents  
(stalking  
former  
partners,  
inappropriate  
ly sharing  
information  
regarding a  
domestic  
violence  
investigation  
with an  
involved  
party,  
monitoring  
peaceful  
protestors  
after the  
protest is  
over, etc).

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <p>target it is.<br/>This is both<br/>as a target for<br/>ICE &amp; other<br/>law<br/>enforcement<br/>agencies to<br/>access<br/>(which they<br/>have) and for<br/>hackers to<br/>target.</p> <p>RTCC<br/>companies<br/>have been<br/>caught using<br/>data obtained<br/>from hacks &amp;<br/>security<br/>breaches in<br/>their<br/>algorithms.<br/><a href="https://www.404media.co/license-plate-reader-company-flock-is-building-a-massive-people-lookup-tool-leak-shows/">https://www.404media.co/<br/>license-plate-<br/>reader-<br/>company-<br/>flock-is-<br/>building-a-<br/>massive-<br/>people-<br/>lookup-tool-<br/>leak-shows/</a></p> <p>ICE has<br/>access RTCC<br/>databases<br/>from across<br/>the country<br/>including<br/>Washington<br/>State &amp;<br/>supposed<br/>“sanctuary”<br/>states.<br/><a href="https://www.404media.co/ice-taps-into-nationwide-">https://www.404media.co/<br/>ice-taps-into-<br/>nationwide-</a></p> | <p>removed from<br/>Seattle.</p> | <p>Office of Civil<br/>Rights, and<br/>Community<br/>Surveillance<br/>Working<br/>Group all<br/>recommende<br/>d against<br/>RTCC. Why is<br/>the city<br/>considering<br/>expanding<br/>this<br/>technology<br/>now when it<br/>is being used<br/>by ICE to<br/>disappear<br/>people and<br/>its abuses are<br/>so<br/>documented?</p> <p>Where is the<br/>money for<br/>this<br/>expansion<br/>coming from?<br/>Relatedly,<br/>how is there<br/>money for<br/>this while the<br/>city is doing<br/>austerity and<br/>cutting<br/>services?</p> <p>Why was SPD<br/>allowed to<br/>submit the<br/>original SIR<br/>for RTCC<br/>without<br/>estimating an<br/>annual cost<br/>only to be<br/>allowed to<br/>say it needed<br/>millions of<br/>dollars per</p> |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

ai-enabled-  
camera-  
network-  
data-shows/

Law  
enforcement  
in states with  
abortion bans  
have utilized  
RTCC to  
search  
nationwide  
databases of  
surveillance  
data.  
Including  
surveillance  
data from  
abortion  
sanctuary  
states to look  
for people  
that have had  
abortions.  
[https://www.  
404media.co/  
a-texas-cop-  
searched-  
license-plate-  
cameras-  
nationwide-  
for-a-woman-  
who-got-an-  
abortion/](https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion/)

No law,  
contract,  
agreement, or  
court  
decision can  
stop ICE from  
accessing  
RTCC  
databases  
because the  
current  
federal  
administratio  
n does not

year for RTCC  
as soon as  
the  
technology  
was  
approved?

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                   |                                                                                                                                                                                                                             |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>care about or follow the law or court decisions</p> <p>That's even before considering all of the cases of individual officers abusing RTCC to spy on and blackmail people.</p> |                                                                                                                                                                                                                             |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                |
| 1<br>6                                                                                                                                                                            | <p>It is a breach of privacy for the general public and will put vulnerable communities at risk.</p>                                                                                                                        | <p>There is no reason for SPD to obtain a cloud-based RTCC</p> <p>It would weaken state laws and endanger women, trans folks, and immigrant residents.</p>                                                                           | None                                                                                                                                                                                                                    | <p>It's effect on vulnerable communities.</p>                                                                                                                                                                                                  |
|                                                                                                                                                                                   | <p>RTCCs dramatically expand the city's surveillance capabilities, collecting real-time data about people's locations, habits, and associations. This infrastructure reinforces racial profiling, targets already over-</p> | <p>Any claims of value are minimal and overstated. While RTCCs are sometimes credited with minor improvements in clearing cases, such as a 5% increase in Chicago, there is no meaningful evidence that they reduce gun violence</p> | <p>City leadership should consider how much public money is being funneled into a system that has little proven impact on safety. As outlined by the ACLU and Stop Surveillance City, these funds—over \$2 million—</p> | <p>Before making any decisions, the City should hold public hearings and require independent studies on the impact of surveillance on civil rights. Communities most impacted by policing must have a voice in this process. Seattle has a</p> |

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                             |                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>policed communities, and puts undocumented people and those seeking reproductive or gender-affirming care at risk. According to Stop Surveillance City, Seattle police have a documented history of abusing surveillance tools, including spying on protestors and activists. There's no reason to believe a Real-Time Crime Center would be any different, especially with no independent oversight or accountability.</p> | <p>or make communities safer. Stop LAPD Spying and other watchdog groups have shown these systems mainly serve to intensify police presence, not solve crime. They create a high-tech illusion of safety while failing to address the root causes of harm.</p> | <p>would be far better spent on proven community-based solutions like housing, youth programs, mental health care, and violence interruption. RTCCs are not a public safety necessity—they are a political and technological overreach.</p> | <p>choice: continue down a path of expanding surveillance and criminalization, or invest in real public safety rooted in care, equity, and community. We urge you to reject the RTCC proposal.</p> |
| <p>1<br/>8 This will be used to further surveil and criminalize our most vulnerable neighbors! This is a huge invasion of</p>                                                                                                                                                                                                                                                                                                  | <p>Waste of money! In a cost of living crisis in an increasingly unaffordable city, in a housing and groceries crisis, where safety nets are being cut,</p>                                                                                                    | <p>That it is a waste of money and a huge violation of residents' privacy.</p>                                                                                                                                                              |                                                                                                                                                                                                    |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>privacy for everyone!</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>this is the absolute last thing any regular person needs!</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents. Moving the on-premise RTCC database to an off premise, cloud-hosted database managed by a third-party, private company would enable</p> | <p>None that would outweigh its harms.</p>                       | <p>This technology is expensive and studies show it has either no, or negligible, impact on solving crime. I want City dollars to be spent on solutions that have been PROVEN to be effective at reducing crime — such as community-led violence interruption programs — not systems like this which have not. See this document (<a href="https://docs.google.com/document/d/14EhNiDMb7M8Z7TafyZsbxGOfdelDOGzRYxZNd3biwIE/edit">https://docs.google.com/document/d/14EhNiDMb7M8Z7TafyZsbxGOfdelDOGzRYxZNd3biwIE/edit</a>) for specific examples of the many effective tools the city should use instead, which are</p> |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

other states  
to circumvent  
WA state's  
Shield Law  
and Keep WA  
Working Act,  
which are  
meant to  
protect both  
people  
seeking  
reproductive  
healthcare  
and  
immigrant  
workers.

My concerns  
include the  
examples of  
harm caused  
by this type of  
technology  
listed here:  
<https://docs.google.com/document/d/14EhNiDMb7M8Z7TafyZsbxGOfdelDOGzRYxZNd3biwIE/edit>

This  
technology is  
expensive  
and studies  
show it has  
either no, or  
negligible,  
impact on  
solving crime.  
I want City  
dollars to be  
spent on  
solutions that  
have been  
PROVEN to  
be effective  
at reducing

actually  
shown to  
decrease  
violence.

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>crime — such as community-led violence interruption programs — not systems like this which have not.</p>                                                                                                                                                                    |                                    |                            |                                                                                                                                                                                                                                                                                              |
| <p>I strongly oppose moving our onsite real-time crime center (RTCC) to the cloud. It will be less protected there and more vulnerable to requests for data from other states — states that have strong, negative views of women’s right to abortion, of trans people, and</p> |                                    |                            | <p>I want my city to use viable, proven solutions like violence interruption programs, mental health services, and investments in libraries and green spaces, etc., to make our city safer and better. Not surveillance, and not by moving RTCC in a way that will put people in danger.</p> |
| <p>2 of<br/>0 immigrants.</p>                                                                                                                                                                                                                                                  |                                    |                            |                                                                                                                                                                                                                                                                                              |
| <p>I am against the use of this technology.</p>                                                                                                                                                                                                                                | <p>I am against the expansion.</p> | <p>None</p>                |                                                                                                                                                                                                                                                                                              |
| <p>That SPD will use this to target, harass, and profile marginalized community members</p>                                                                                                                                                                                    |                                    | <p>Absolutely no value</p> | <p>SPD has a long history of using their tools and resources against the community to the point of being under federal</p> <p>Stop wasting our resources and tax dollars on SPD and fund what the community actually needs!</p>                                                              |

oversight for many years- they do not need more tools and resources!

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| <p>RTCCs dramatically expand the city's surveillance capabilities, collecting real-time data about people's locations, habits, and associations. This infrastructure reinforces racial profiling, targets already over-policed communities, and puts undocumented people and those seeking reproductive or gender-affirming care at risk. According to Stop Surveillance City, Seattle police have a documented history of abusing surveillance tools, including spying on protestors</p> | <p>Any claims of value are minimal and overstated. While RTCCs are sometimes credited with minor improvements in clearing cases, such as a 5% increase in Chicago, there is no meaningful evidence that they reduce gun violence or make communities safer. Stop LAPD Spying and other watchdog groups have shown these systems mainly serve to intensify police presence, not solve crime. They create a high-tech illusion of safety while failing to address the root causes of harm.</p> | <p>City leadership should consider how much public money is being funneled into a system that has little proven impact on safety. As outlined by the ACLU and Stop Surveillance City, these funds—over \$2 million—would be far better spent on proven community-based solutions like housing, youth programs, mental health care, and violence interruption. RTCCs are not a public safety necessity—they are a political and technological overreach.</p> | <p>Before making any decisions, the City should hold public hearings and require independent studies on the impact of surveillance on civil rights. Communities most impacted by policing must have a voice in this process. Seattle has a choice: continue down a path of expanding surveillance and criminalization, or invest in real public safety rooted in care, equity, and community. We urge you to reject the RTCC proposal.</p> |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|        | and activists.<br>There's no<br>reason to<br>believe a<br>Real-Time<br>Crime Center<br>would be any<br>different,<br>especially<br>with no<br>independent<br>oversight or<br>accountabilit<br>y. |                                                                                           |                                                                               |                                                    |                                                                                                                                             |     |                                                                               |
|        | My concern is<br>that this<br>technology<br>will violate<br>Seattlite's<br>right to<br>privacy, and<br>make<br>Seattlites<br>anxious and<br>paranoid<br>about being<br>watched all<br>the time.  | N/A                                                                                       | None, it<br>would be a<br>complete<br>waste of our<br>already thin<br>budget. | N/A                                                | Privacy is a<br>RIGHT.                                                                                                                      | N/A | N/A                                                                           |
| 2<br>5 | Surveillance<br>is a powerful<br>tool of social<br>repression<br>and state<br>violence<br>against its<br>populace                                                                                | It's use to<br>support ICE<br>and their<br>enforced<br>dissappearan<br>ces of<br>peoples. | None. It will<br>only be used<br>to harm<br>people.                           | We keep us<br>safe, not<br>endless<br>surveillance | The immense<br>harm it will<br>cause to<br>already<br>marginalized<br>and abused<br>portions of<br>our<br>population.<br>NO POLICE<br>STATE |     | Could we use<br>this to track<br>the City<br>Council<br>members<br>movements? |
| 2<br>6 | I do not want<br>more police<br>surveillance.                                                                                                                                                    |                                                                                           | None. SPD is<br>big enough<br>and has<br>enough<br>resources.                 |                                                    | Expanding<br>other<br>programs to<br>benefit<br>residents<br>material<br>situation.                                                         |     |                                                                               |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>This is an invasion of privacy and implements strategies utilized by</p> <p>2 fascist</p> <p>7 governments.</p>                                                                                                                                                                                                                     | <p>None</p>                                         | <p>This technology does not represent the values of Seattle, and it is NOT what the people want. Please do not allow this abuse of power in our city.</p>                                                                                                                                                           |
| <p>It's frightening, if could be hacked and used against people and it</p> <p>2 won't reduce</p> <p>8 crime.</p>                                                                                                                                                                                                                       | <p>None, we do not need increased surveillance.</p> | <p>How it's going to affect everyone, the cost vs. benefit and how little it's going to make a difference in crime.</p>                                                                                                                                                                                             |
| <p>Surveillance is used primarily to harm people of color and other marginalized groups. Police in this city are already bad enough at protecting the people, providing our data and privacy is only going to lead to more unnecessary violence. Allowing even more citywide</p> <p>2 surveillance</p> <p>9 is a huge injustice to</p> |                                                     | <p>City leadership must place restrictions on this technology, cops already patrol in these areas more frequently. This frequent patrolling is what causes divides, inequalities, and contributes to higher crime rates. The addition to real time high definition cameras protects no one and can only be used</p> |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|        | the city.<br>Desired<br>expansion<br>into even<br>more<br>marginalized<br>spaces will<br>not help cops<br>catch bad<br>guys, it will<br>help cops<br>racially<br>profile,<br>brutalize, and<br>discriminate<br>against our<br>own people.                                                             |      |                                 | to<br>retroactively<br>bring some<br>sort of<br>justice. Any<br>funds<br>towards this<br>project could<br>easily be<br>used towards<br>other<br>programs that<br>truly keep<br>communities<br>safe such as<br>hard<br>reduction,<br>community<br>centers, and<br>funding for<br>education. |                                                                                                                                                                                                                                                                                       |
|        |                                                                                                                                                                                                                                                                                                       |      |                                 | FOCUS ON<br>INVESTING IN<br>OUR HEALTH<br>AND<br>EDUCATION,<br>NOT<br>POLICING                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                       |
| 3<br>0 | I oppose the<br>expansion of<br>surveillance                                                                                                                                                                                                                                                          | none | expensive<br>and<br>ineffective |                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                       |
| 3<br>1 | This<br>technology<br>will make it<br>less safe for<br>marginalized<br>people in<br>Seattle.<br>Transgender<br>and queer<br>people are<br>already<br>targeted by<br>police, as<br>seen in police<br>brutality<br>recently at<br>Cal Anderson<br>Park on May<br>24. Efforts to<br>criminalize<br>being |      |                                 | Consider the<br>danger of the<br>federal<br>government<br>or military<br>coming to<br>Seattle to<br>take our data<br>and use it for<br>their own<br>means. And<br>consider the<br>people who<br>don't want to<br>have their<br>identity<br>constantly<br>found on a<br>police              | Rather than<br>investing in<br>this<br>technology<br>and the<br>constant<br>sweeps on<br>homeless<br>encampment<br>s, we should<br>spend more<br>money giving<br>them<br>affordable<br>housing.<br>South Lake<br>Union and<br>other areas<br>must create<br>affordable<br>housing for |

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| <p>transgender are being made in many other states (and at a federal level). Allowing more security cameras to track and store information about us is extraordinary dangerous.</p> <p>Moreover, this detracts from us being a sanctuary city for migrants. We need to protect our friends and family no matter what. Migrants provide an essential role in our economy, and without them we will face higher costs, longer wait times at our favorite restaurants, and we will lose what makes Seattle special.</p> |                                                                         |                                                   |  | <p>security screen.</p>                                              | <p>those who need it.</p> |
| <p>ICE and Border patrol are using cloud-based surveillance tools to</p>                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>There is no evidence whatsoever that RTCC lives up to the vendor</p> | <p>I do not see any value in this technology.</p> |  | <p>There is no evidence whatsoever that that RTCC has any public</p> |                           |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>conduct warrant-less searches and violate sanctuary city laws. Vendor contracts are insufficient to protect the data. This has been reported on by 404 media. <a href="https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/">https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/</a> Furthermore the Trump administratio n has informed ICE employees that they are at liberty to conduct warrant-less searches <a href="https://www.thehandbasket.co/p/ice-warrantless-arrests-castanon-nava">https://www.thehandbasket.co/p/ice-warrantless-arrests-castanon-nava</a> Any expansion of this technology is a weapon in the hands of the Trump administratio n and puts our immigrant communities at risk.</p> | <p>claims. The 2024 paper that SPD cites states that RTCC "appeared to have a relatively smaller impact on violent crime clearance (5% increase)," other studies of RTCC show no effect on violent crime clearance rates. This technology is costly and a waste of city dollars at a time when the cities deficit and federal cuts threaten vulnerable communities. This technology and any expansion of it and especially ending its definition of a "pilot" without any evaluation of the program and only 3 weeks after its implementati on in unconscionable.</p> | <p>benefit. In fact, I have spoken to Brian Maxey, who stated that the benefits of RTCC were "anecdotal and hypothetical" Cloud-bases surveillance tools are a weapon in the hands of the Trump administratio n and will be used to violate our sanctuary laws. We will hold our city leaders accountable for the decision to pursue RTCC and to ignore public input which has been largely dis favorable of the technology.</p> |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>This adds to SPD's enormous surveillance network. This allows data to go to the cloud where it can be hacked. This allows SPD to cooperate</p> <p>3 with ICE,</p> <p>3 CBP, etc.</p>                                                                    | <p>None</p>                         | <p>Why would we want to expand SPD's already enormous surveillance network?</p> <p>Why would we want to do anything that could lead to data sharing with ICE, CBP, etc.?</p> |
| <p>It can be used to target women, immigrants, and LGBTQ+ individuals. SPD already has plenty of surveillance technology. The cost of this program could be</p> <p>3 better spent</p> <p>4 on hiring.</p>                                                  | <p>None</p>                         | <p>Consider the privacy rights of the population at large. This is police state stuff!</p>                                                                                   |
| <p>Surveillance is a powerful tool of social oppression. This will only increase violence. It will only lead to more discrimination and division. Adding more surveillance technology will only increase crime and</p> <p>3 increase</p> <p>5 violence</p> | <p>No value. This is dangerous.</p> | <p>Think of where else the funding for this could go. Preventive care for the people!</p>                                                                                    |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| towards<br>innocent<br>people                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>Many. Please</p> <p>3 do not</p> <p>6 expand.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Please direct<br/>funds<br/>towards<br/>affordable<br/>housing and<br/>human<br/>services.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>This<br/>technology is<br/>a threat to our<br/>first and<br/>fourth<br/>amendment<br/>rights. It will<br/>be harmful to<br/>women,<br/>sexual<br/>assault and<br/>stalking<br/>survivors, and<br/>vulnerable<br/>marginalized<br/>community<br/>residents<br/>because the<br/>third party<br/>RTCC<br/>software is<br/>not protected<br/>and can be<br/>used<br/>negatively on<br/>law-abiding<br/>community<br/>members by<br/>out of state<br/>individuals or<br/>prosecuting<br/>agents. It will<br/>allow<br/>circumnaviga<br/>tion of WA<br/>state's Shield<br/>Law and Keep</p> <p>3 WA Working</p> <p>7 Act, which</p> | <p>I see no value<br/>in this<br/>technology.<br/>Studies show<br/>that it is<br/>actually not<br/>effective in<br/>reducing<br/>violent crime.<br/>But there are<br/>many cases<br/>where it has<br/>been used by<br/>law<br/>enforcement<br/>to harass<br/>people and<br/>divulge<br/>private<br/>information<br/>about people<br/>fleeing<br/>domestic<br/>violence and<br/>other state<br/>violence<br/>which is<br/>wrong.</p> | <p>I'd urge them<br/>to consider<br/>where that<br/>money could<br/>be spent<br/>elsewhere to<br/>actually<br/>improve the<br/>lives of those<br/>underserved<br/>or most<br/>vulnerable.<br/>Why not scale<br/>the effective<br/>community-<br/>led solutions<br/>such as the<br/>Regional<br/>Peacekeeper<br/>s Collective<br/>coordinated<br/>by the<br/>Regional<br/>Office of Gun<br/>Violence<br/>Prevention<br/>and the<br/>Rainier Beach<br/>Action<br/>Coalition and<br/>their<br/>Restorative<br/>Resolutions<br/>project,<br/>which has<br/>already<br/>reduced<br/>violence in<br/>the Rainier</p> |

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| <p>WA residents voted on and needs to be upheld. It is also expensive and would needlessly add to our already \$250 million shortfall of the 2025 budget. Studies also show that it is actually not affective in reducing violent crime. Please, do not vote to outsource this surveillance to a third part.</p> |                                                                                                                                   | <p>Beach neighborhood by 33%? Both violent crime and property crime can be reduced by community investments. Investments restoring vacant land and community non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes.</p> |
| <p>More surveillance is not more safety, and adding even more cameras is not the answer to reducing crime or other issues. More cameras on the streets will be used for purposes other than safety and this should not be done under any</p>                                                                     | <p>I see no value in this, and I understand this to be purely a move to further surveil and monitor the residents of Seattle.</p> | <p>How this technology will truly be implemented over safety measures. This technology is easily manipulated and used to profile people.</p>                                                                                                                                        |
| <p>3<br/>8</p>                                                                                                                                                                                                                                                                                                   | <p>None, it will not aid in keeping Seattle safe.</p>                                                                             | <p>More cameras is not the answer.</p>                                                                                                                                                                                                                                              |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | circumstances.                                                                                                                                                                                                                                        |                                                                                                                                                              |                                                                                |                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                        |
| 3 | The use of these cameras so widely has been policy acceptable specifically because it was not used by police. I am deeply concerned about the privacy implications of this data was used freely by the police. Not to mention the Trump administratio |                                                                                                                                                              |                                                                                |                                                                                                                                                                                                                          | How this change violates the trust of Seattle's citizens. How this helps further the authoritarian goals of the Trump administratio                                                                                                                                                      |                                                                                                                                                                                                                                                        |
| 9 | n.                                                                                                                                                                                                                                                    | None.                                                                                                                                                        |                                                                                |                                                                                                                                                                                                                          | n.                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                        |
| 4 | I am concerned about the potential for cloud-based systems to enable data to be accessed by other parties and thus circumvent Washington's protections such as the Shield Law and Keep Washington Working laws.                                       | I am concerned about any third part private company having access to law enforcement data. I prefer the the RTCC be kept on premise rather than off premise. | I do not see value in expanding this technology to be for cloud-based systems. | Please, please do take the perspectives of your constituents into account. We do not know how things will move federally and with AI in the future, we need to move cautiously to uphold our core constitutional values. | See the above comments. This is a risky step, without clear benefit, that opens Washingtonia n's up to greater surveillance by federal and third party companies. We can't fully know how data captured now will be used in the future. I fully support the SPD in accessing information | Remember that we need to make decisions now with a forethought to our future generations. No decision will be perfect but we need to consider privacy and freedom with the awareness that these rights are not ensured to be respected moving forward. |
| 0 |                                                                                                                                                                                                                                                       |                                                                                                                                                              |                                                                                |                                                                                                                                                                                                                          | Please see above comments.                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                        |

to solve  
crimes. I do  
not support  
maintaining  
this  
information  
on the cloud  
by a third  
party private  
company,  
without  
greater data  
protections.  
Thank you so  
much for  
hearing me.

Increasing  
surveillance  
will increase  
racial  
profiling, and  
make it easier  
for the police  
and state  
agencies to  
track and  
target  
vulnerable  
individuals &  
groups,  
putting them  
in more  
danger. The  
technology is  
used to  
criminalize &  
harm my  
immigrant  
neighbors,  
neighbors  
who live  
unsheltered,  
neighbors  
who use  
drugs,  
neighbors  
who work in  
the sex trade,  
and my

Consider how  
the use and  
expansion  
and sharing  
of this  
technology  
puts your  
already  
vulnerable  
constituents  
in more  
danger, and  
contributes to  
ever widening  
state  
repression  
and control of  
the people.

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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| neighbors of color. |                                                                                                                                                                                                                                                                                                          |                                                                            |               |                                                                                                                                                                                                                                                                                |              |                      |
|                     | <p>I am concerned about how it might be used outside of the state and beyond our state laws, bounty hunter laws from Idaho, for example. Other examples could be federal over reach. Not into this tech.</p>                                                                                             | <p>I do not approve of this level of invasive surveillance in general.</p> |               | <p>Who this is actually going to effect, who is this immediately going to impact, and who is it actual helping. How could this be abused, by who, and what would the consequence s of that be? Are there better uses for these funds and personnel?</p>                        |              |                      |
| 4                   | Not down.                                                                                                                                                                                                                                                                                                |                                                                            | No value that |                                                                                                                                                                                                                                                                                |              |                      |
| 2                   | No, please.                                                                                                                                                                                                                                                                                              |                                                                            | I approve of. |                                                                                                                                                                                                                                                                                | Don't do it. | Please, don't do it. |
|                     | <p>Yes, I do have massive concerns about this technology in just the fact that it's yet another part of mass governmental surveillance that's been slowly expanding over the past few decades. The program already has already been likely used for helping track cross-state abortions. And as more</p> |                                                                            |               | <p>Consider whether it's worth conducting mass-surveillance on your constituents in exchange for extremely minor benefits, if any. Consider whether it's worth contributing to the erosion of both people's right to privacy, as well as assisting in interstate hunts for</p> |              |                      |
| 4                   |                                                                                                                                                                                                                                                                                                          |                                                                            |               |                                                                                                                                                                                                                                                                                |              |                      |
| 3                   |                                                                                                                                                                                                                                                                                                          |                                                                            |               |                                                                                                                                                                                                                                                                                |              |                      |

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>and more states take away people's rights as we've seen over the past few years, it'll only be used for such purposes even further. Do not spy on citizens. Do not spy on your constituents. SPD is more than capable of doing its job without engaging in mass-surveillance.</p>            |                                                                                                                                                                                                                                                | <p>people trying to exercise their bodily autonomy. And don't lie to yourselves about how this will be "limited" or "only for certain criminal activities" because these kinds of things will and have always, always, ALWAYS expanded and have ALWAYS been co-opted. Please do not do this.</p> |
| <p>Expanding civilian transportation technology to police makes us less safe, not more safe. The police do not need more data. In addition there is a history of police departments collaborating with federal authorities, such as ICE. Integrating traffic data with the police decreases</p> | <p>This is an irrelevant question without also considering the direct and potential harm this would cause. When those are first evaluated the risk is so high, that no value in implementing this camera integration project could offset.</p> | <p>Remember that the current federal government wants to deport immigrants black and brown residents, stop abortion healthcare, and ban gender healthcare. Every step you take to expand the surveillance infrastructure is building more tools that they will</p>                               |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|        |                                                                                                                                           |                                                                 |                                                                                                                                                                     |                                                                       |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
|        | the barrier to federal authorities' access, which increases the danger to our most vulnerable citizens.                                   |                                                                 |                                                                                                                                                                     | use when they have the chance, regardless of your intent.             |
| 4<br>5 | I am concerned that this expansion will endanger those traveling to our state seeking reproductive Healthcare and transgender healthcare. | We have RTCC technology and do not need to involve a 3rd party. | I understand the value of the current system to law enforcement. The cons outweigh the pros when we send it to the cloud and enable a nationwide spying capability. | See #1                                                                |
| 4<br>6 | This is clear over-reach and abuse of surveillance technology against citizens; moreover it weakens our state's protections               | Quite valuable to authoritarian style government                |                                                                                                                                                                     | It should be bone-chilling that we have normalized such intrusiveness |
| 4<br>7 | It would put our privacy at risk for being free to travel between states for lifesaving healthcare needs.                                 | I don't think it's safe to outsource like this.                 | That it could override Washington's laws for privacy protection!                                                                                                    | THE PEOPLE DON'T WANT IT.                                             |
| 4<br>8 | Exposing information to ICE that                                                                                                          | None                                                            |                                                                                                                                                                     |                                                                       |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        | they should<br>not have                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4<br>9 | <p>RTCC and CCTV do not provide any benefit to mitigate all of the harm they cause. They neither reduce violence nor increase clearance (arrest rates) for violent crime. A 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime or disorder”. Despite RTCC’s high price tag (“initial costs ranging between several hundred thousand dollars and \$11 million”), studies of RTCC show no effect on violent crime clearance rates. These technologies will foster the</p> | <p>RTCC and CCTV do not provide any benefit to mitigate all of the harm they cause. They neither reduce violence nor increase clearance (arrest rates) for violent crime. A 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes “no significant effects observed for violent crime or disorder”. Despite RTCC’s high price tag (“initial costs ranging between several hundred thousand dollars and \$11 million”), studies of RTCC show no effect on violent crime clearance rates.</p> |
|        | None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

very spirit of  
distrust and  
disunity that  
you claim to  
hope they will  
end. that  
response  
should be  
increased  
investment in  
equitable and  
evidence-  
based  
strategies for  
gun violence  
prevention  
while also  
offering  
meaningful  
support to  
victims and  
survivors.  
Violence can  
be reduced  
by  
investments  
in violence  
interruption  
programs,  
mental health  
treatment,  
substance-  
abuse-  
treatment  
facilities,  
affordable  
housing,  
emergency  
financial  
assistance,  
and libraries.  
Poverty and  
income  
inequality are  
associated  
with violence,  
especially  
assault and  
homicide.  
Evidence

supports that  
this is a  
causal link,  
inequality  
predicts  
homicides  
better than  
any other  
variable.  
Surveillance  
contributes to  
disinvestmen  
t in  
communities.  
Seattle is  
required to  
have a  
balanced  
budget, every  
dollar spent  
on  
surveillance  
is a dollar  
that cannot  
be invested in  
any of the  
evidence-  
based  
strategies for  
violence  
prevention  
listed above  
or otherwise  
invested in  
our  
communities  
as mental  
health  
supports,  
programs for  
kids,  
parks/public  
spaces,  
affordable  
housing,  
jobs/job skill  
training, and  
food access.  
Police have a  
lengthy

history of  
mis-using  
and abusing  
surveillance  
to blackmail  
people, target  
people based  
on their  
religion, spy  
on people,  
and cover up  
violence by  
police. SPD  
has a history  
of abusing  
the  
surveillance  
tools it  
already has,  
including to  
spy on  
protestors,  
stalk former  
romantic  
partners, and  
leak  
information  
about  
domestic  
violence  
victims.  
Additionally,  
SPD has a  
history of  
providing  
inaccurate  
information in  
Surveillance  
Impact  
Reports  
(SIRs) for the  
technologies  
it wants. SPD  
has done this  
with CCTV &  
RTCC at least  
once already.  
On February  
12, 2024, SPD  
Captain

James Britt  
told the  
public that  
SPD would  
absolutely  
not actively  
monitor CCTV  
feeds in the  
RTCC. Nick  
Zajchowski  
from SPD  
contradicted  
this in the  
June 26, 2024  
meeting of  
the  
Community  
Surveillance  
Working  
Group saying  
that SPD  
would be  
actively  
monitoring  
the camera  
feeds at least  
part of the  
time.  
Cloud-based  
surveillance  
tools destroy  
Seattle's  
ability to act  
as a  
sanctuary city  
and render  
Washington  
State's Shield  
Law and the  
Keep  
Washington  
Working Act  
meaningless.  
Surveillance  
creates a  
map of  
people's lives  
that  
Immigration  
and Customs

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| <p>Enforcement (ICE) and law enforcement &amp; private individuals in other states, including ones with bans on abortion and/or transgender healthcare, can access through the for-profit companies storing it. The CCTV pilot specifies the Aurora corridor and includes the Planned Parenthood located on Aurora Avenue and 105th. The rate of people coming from other states to seek abortion in Washington increased by 36% in 2023.</p> |              |                                                                                        |
| <p>So many! It makes our city less safe. It takes away our privacy protections.</p>                                                                                                                                                                                                                                                                                                                                                           | <p>None.</p> | <p>Outsourcing means we would lose our Seattle/WA privacy laws which we cannot do!</p> |
| <p>Having sensitive information essentially</p>                                                                                                                                                                                                                                                                                                                                                                                               |              | <p>We are in scary times. Your public words of</p>                                     |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

owned and outsourced to an unregulated, private 3rd party system is a huge concern and puts many vulnerable populations at risk of exploitation - people from other states coming to WA for gender affirming care or abortions, for one thing ... it also puts immigrants at risk and violates (in an indirect way) the reassurance that has been provided that the police are not collecting data and sharing it with ICE, etc; if a 3rd party has access to this information and shares it with ICE or others, and we are complicit in supplying the information to a third party system, then we are complicit in the whole system.

reassurance about protecting the safety of the most vulnerable among us mean very little if your actions directly or indirectly put those same folks at great risk. WA is a beacon of hope in the country right now. I have friends from all over who have talked about moving here, visiting here, etc. Those same people will absolutely NOT come, even to visit, if they know their information is being collected and shared with private, unregulated 3rd party systems. They are not safe where they stand. And I feel like I (as a queer person) am standing on sand every day, even in this

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|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                      | “progressive” state because of decisions like these. Please protect us.                                                                                                                                                                                                                       |
|        |                                                                                                                                                                                                                                                                            | This change will enable other states to circumvent WA state’s Shield Law and Keep WA Working Act, which are meant to protect both people seeking reproductive healthcare and immigrant workers.                                                                                                      |                                                                                                                                                                                                                                                                                               |
|        |                                                                                                                                                                                                                                                                            | SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state |                                                                                                                                                                                                                                                                                               |
| 5<br>2 | Seriously?<br>The<br>GOP/Trump<br>administratio<br>n has ICE and<br>Homeland<br>Security<br>officers<br>acting like the<br>Secret Police,<br>and Seattle<br>City Council<br>proposes to<br>make<br>surveillance<br>data available<br>to those<br>entities (and<br>others)? |                                                                                                                                                                                                                                                                                                      | Whether the<br>City<br>leadership<br>really wants<br>to make<br>violations of<br>Constitutiona<br>l rights even<br>easier--and<br>whether the<br>majority of<br>the city's<br>electorate<br>supports this<br>use of our tax<br>dollars<br>(especially<br>given the<br>city's budget<br>woes). |
|        |                                                                                                                                                                                                                                                                            | None<br>whatsoever.                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                               |

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laws and  
endanger  
women, trans  
folks, and  
immigrant  
residents.

|                |                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                       |                                                                                                                                       |                                                                                                                                     |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| <p>5<br/>3</p> | <p>Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. If SPD switches over to a cloud-hosted RTCC database, we enable the criminalization of those seeking reproductive care.</p> | <p>none</p>                                                                                                           | <p>The need to protect our vulnerable citizens from additional, unnecessary surveillance.</p>                                         |                                                                                                                                     |
| <p>5<br/>4</p> | <p>My concerns are vast but it boils down to a concern for the safety and well being of women receiving access to safe abortions. Beyond that</p>                                                                                                                                                                                                          | <p>I wouldn't want this available to law enforcement even in a climate that WASN'T objectively out of control, as</p> | <p>I do not see the value of this if a safer society is the goal. And I imagine that a safer society is a non-controversial idea.</p> | <p>Giving a powerful tool like this to assist the illegal deportation of immigrants is not good for this city, or this country.</p> |
|                |                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                       | <p>Consider the extremism that is becoming more palatable by the sheer mass of petitions, requests and threats from this</p>          |                                                                                                                                     |

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| we know this data will be available to border patrol, ICE etc and I don't think in this climate anyone can argue that this will make anyone safer. This will negatively affect quality of life for many people. |                                                                                                                                                | this current one is. | Presidential administration and those in support of it; consider it daily and stay sane. |                                                                                                           |                          |                                                            |
| 5                                                                                                                                                                                                               | This further endangers women, trans folks, and immigrant residents.                                                                            | 5                    | None                                                                                     | Reveals sensitive personal info including where someone lives, works, and their religious affiliation.    |                          |                                                            |
| 5                                                                                                                                                                                                               | Unnecessary surveillance by a government that is already targeting vulnerable people, as well as people who are standing up for our democracy. | 6                    | none that outweighs the costs and risks                                                  | Do not risk harming vulnerable peoples.                                                                   |                          |                                                            |
| 5                                                                                                                                                                                                               | In the current political environment there is danger that this information will be used by agencies                                            | 7                    | None                                                                                     | I can see no value in sharing this information. If there is a legitimate need then the information can be | None who is going to use | Who is going to use this information and for what purpose. |
|                                                                                                                                                                                                                 |                                                                                                                                                |                      |                                                                                          |                                                                                                           | None                     | Do not approve this sharing of information.                |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| that not law abiding.                                                                                                                                   | requested in a lawful manner in a supena.                                             |                                                                                                                                                                                                         |                                                                                              |
| <p>Please, PLEASE, help protect our innocent residents and citizens!</p> <p>Please please do NOT help ICE!</p>                                          | <p>Sure, great, but NOT to aid illegal and wrong actions on behalf of bad people!</p> | <p>Please do not use this technology to hurt innocent people.</p> <p>Please!</p>                                                                                                                        | <p>I thought I read on Substack that our police chief was going to protect our people. ?</p> |
| <p>I don't want it to track people to the degree it will be able to. It's an invasion of privacy. I do not want to put my tax dollars towards this.</p> |                                                                                       |                                                                                                                                                                                                         |                                                                                              |
| <p>I'm concerned about federal access to this information. If it's not in the cloud no one can ask Seattle, Seattle PD, or a cloud provider for it.</p> | <p>No value for individuals; tremendous value for ICE.</p>                            | <p>Don't use it. The fact of the existence of the data makes it exceedingly vulnerable to the feds. Even if access is granted "accidentally" or if the courts require that the data is handed over.</p> |                                                                                              |
| <p>You can be used to Target defenseless individuals.</p>                                                                                               | <p>None</p>                                                                           | <p>Do the disadvantages outweigh the advantages?</p>                                                                                                                                                    |                                                                                              |

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>This database is available to ICE and will be used to fuel its brutal, careless, and illegal campaign against immigrants regardless of their status and anyone who challenges their illegal actions that ignore the rule of law, the Constitution, and the authority of the Congress.</p> |                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                   |                         | <p>The reason given in question 1 is sufficient to reject use of this technology. ICE has become a threat to every American.</p>                                                                                                                        |                                                                                                                                                                                                                                                               |
| 6<br>3                                                                                                                                                                                                                                                                                       | <p>police power<br/>overreach</p>                                                                                                                                                                                                            | <p>recycling it into something to enable peace</p>                                                                                                                                                                                | <p>just don't do it</p> | <p>handshakes are more powerful than digital eyes</p>                                                                                                                                                                                                   |                                                                                                                                                                                                                                                               |
| 6<br>4                                                                                                                                                                                                                                                                                       | <p>RTCC software is a cloud-based software platform designed for real-time crime centers to integrate multiple surveillance technologies such as cameras, automated license plate readers (ALPRs), CCTV, among other police surveillance</p> | <p>This technology can be abused and accessed by third parties when stored in the cloud and poses a threat of harm and misuse to all people exercising First Amendment Rights of free speech, public protest and assembly. It</p> | <p>None</p>             | <p>This powerful technology should not be passed without an opportunity for serious consideration and public comment. We are seeing a dangerous rise in authoritarianism at the federal level and having a cloud-based RTCC runs the risk of having</p> | <p>They need to consult with privacy advocates, including the ACLU and Electronic Frontier Foundation, to fully understand the threat</p> <p>Once you go down this road, you cannot easily turn back, so you should be incredibly careful and thoughtful.</p> |

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| tools. RTCC software like Fusus can turn any camera into an automated license plate readers (ALPRs) which gather enough data to reveal sensitive personal information, including where someone lives, works, and their religious affiliation.                                                | is also expensive, unnecessary, and has little likelihood of making Seattle any safer. | Seattle contribute to spying on private citizens who are exercising their legal rights. |
| The City Council's attempt to move the on-premise RTCC database to an off premise, cloud-hosted database managed by a third-party, private company. This change will enable other states to circumvent WA state's Shield Law and Keep WA Working Act, which are meant to protect both people |                                                                                        |                                                                                         |

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seeking  
reproductive  
healthcare  
and  
immigrant  
workers.

SPD already  
has a real  
time crime  
center. SPD's  
existing RTCC  
(iBase) is on-  
premise, so it  
doesn't  
create the  
risk of data  
being  
obtained  
from third  
parties or  
legal requests  
from those  
outside  
Washington  
state. There is  
no reason for  
SPD to obtain  
a cloud-  
based RTCC  
which would  
weaken state  
laws and  
endanger  
women, trans  
folks, and  
immigrant  
residents

|        |                                                                                                                                      |                                                                                                                                           |                                               |                                                                                                                                               |
|--------|--------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| 6<br>5 | I have so many concerns. (1) Creation of a RTCC will create a system that will become a MAGNET for abuse as well as the potential to | SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being obtained | None. I see only potential for abuse and harm | Do you want to create a police and surveillance state in our area? Do you want this to be your legacy? Are your values that much aligned with |
|--------|--------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <p>violate the 1st &amp; 4th amendment rights of all residents. (2) Surveillance technology does not aid law enforcement in solving crimes (despite all the tv shows and movies...) (3) This technology represents a very real threat of harm to immigrants - if footage is obtained by ICE, CBP, etc (4) This technology poses a threat of harm to all people exercising First Amendment Rights of free speech, public protest and assembly – especially because its use puts our city solidly into the “surveillance state” and SPD (with its history of required federal</p> | <p>from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents. AND this technology is expensive.</p> | <p>our autocrat Dictator wanna be President??</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|

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|        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |      |                                                                                     |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-------------------------------------------------------------------------------------|
|        | oversight due to bad behavior) has a history of using surveillance systems to spy on peaceful protesters. . (5) Threat of harm to women, sexual assault and stalking survivors, and vulnerable marginalized community residents - historic use of the technology to track religious and sexual minorities, to stalk women/sexual abuse survivors, immigrants, etc (6) Threat of harm by being used to track and intimidate by residents seeking abortion and gender-affirming healthcare |      |                                                                                     |
| 6<br>6 | the use of this cloud based platform could allow ICE and border control to                                                                                                                                                                                                                                                                                                                                                                                                               | None | Do whatever is in your power to stop the use of a cloud based program that could be |

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access  
information  
for at risk  
immigrants.

used by ICE  
and therefore  
put at risk  
immigrants in  
unnecessary  
harms way.

We know that  
these tools,  
which were  
put in place  
by King  
County  
Housing  
Authority,  
have  
generated  
surveillance  
data ICE has  
searched in  
order to look  
for people.  
Not  
criminals—  
just  
immigrants in  
most cases  
that had no  
criminal  
record, but  
who could  
have their  
status  
revoked so  
they could be  
detained and  
deported.

This is not in  
the spirit of  
separating  
state and  
local  
resources  
from federal  
ICE  
enforcement.  
Don't expand

6 the use of  
7 these tools.

In terms of  
sending  
surveillance  
data to  
national,  
private  
databases,  
there are no  
benefits and  
many  
dangerous  
uses to which  
this data  
could be put.

Instead of  
expanding the  
use of these  
systems, their  
use needs to  
be curtailed.  
As a resident I  
and others  
will be  
watching this  
issue closely;  
this is where  
we need to  
put  
"welcoming"  
promises into  
action.

Consider the  
uses this data  
is being put to  
that have  
nothing to do  
with local law  
enforcement.

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|    |                                                                                                                                                                                |                                        |                                                              |                                                                      |           |           |           |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|--------------------------------------------------------------|----------------------------------------------------------------------|-----------|-----------|-----------|
| 6  | Invasion of privacy and data sharing risks to individual freedoms                                                                                                              | It gives the government too much power | None                                                         | Do not expand the ability of the government to spy on the population |           |           |           |
| 6  | It is used by law enforcement all over the country. It can be used to track women who have had an abortion, to track immigrants and to track LGBTQ people.                     |                                        | None that outlays the threat to our citizens.                | Taking care of all our citizens.                                     |           |           |           |
| 70 | These technologies can easily be used to target those the trump administration is (trans youth, BIPOC, immigrants)                                                             |                                        | It's not helpful, please stop spending money on surveillance | Do not approve the use of this technology please.                    |           |           |           |
| 71 | RTCC software is a cloud-based software platform designed for real-time crime centers to integrate multiple surveillance technologies such as cameras, automated license plate | See above                              | See above                                                    | See above                                                            | See above | See above | See above |

readers  
(ALPRs),  
CCTV, among  
other police  
surveillance  
tools. RTCC  
software like  
Fusus can  
turn any  
camera into  
an automated  
license plate  
readers  
(ALPRs)  
which gather  
enough data  
to reveal  
sensitive  
personal  
information,  
including  
where  
someone  
lives, works,  
and their  
religious  
affiliation.

The City  
Council is  
attempting to  
move the on-  
premise  
RTCC  
database to  
an off  
premise,  
cloud-hosted  
database  
managed by a  
third-party,  
private  
company.  
This change  
will enable  
other states  
to circumvent  
WA state's  
Shield Law  
and Keep WA

Working Act,  
which are  
meant to  
protect both  
people  
seeking  
reproductive  
healthcare  
and  
immigrant  
workers.

SPD already  
has a real  
time crime  
center. SPD's  
existing RTCC  
(iBase) is on-  
premise, so it  
doesn't  
create the  
risk of data  
being  
obtained  
from third  
parties or  
legal requests  
from those  
outside  
Washington  
state. There is  
no reason for  
SPD to obtain  
a cloud-  
based RTCC  
which would  
weaken state  
laws and  
endanger  
women, trans  
folks, and  
immigrant  
residents.

Threat of  
harm to  
abortion and  
gender-  
affirming

healthcare:  
Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. If SPD switches over to a cloud-hosted RTCC database, we enable the criminalization of those seeking reproductive care.

The rate of out-of-state abortions, those coming from other states to seek abortion in Washington, increased by 36% in 2023 and included 20 different states including neighboring Idaho and states as far

away as Texas  
and Alabama.

Anti-abortion  
groups have a  
history of  
using license  
plate data.

RTCC  
software  
allows data to  
be shared  
across law  
enforcement  
agencies.

Third party  
agencies in  
anti-abortion  
states could  
use this data  
to criminally  
prosecute  
those seeking  
abortion in  
Washington  
state.

Recently an  
Idaho mother  
and son were  
charged with  
kidnapping  
for allegedly  
taking a  
minor across  
state lines to  
access  
abortion care  
in Oregon.

The state of  
Texas has  
already  
attempted to  
get data from  
Seattle  
Children's  
Hospital for  
any Texas  
residents  
receiving

gender-affirming care. As soon as SPD switches over to a cloud-hosted RTCC database, red states will start issuing subpoenas to access data directly from Fusus.

Threat of harm to women, sexual assault and stalking survivors, and vulnerable marginalized community residents RTCC software enabled a Texas cop to search surveillance data from across the county, including Washington State, other states with abortion “sanctuary” laws, and non-police entities including the King County Housing Authority, for someone that had an

abortion  
RTCC  
software  
makes it  
impossible to  
keep  
surveillance  
data from  
ICE. Local  
police  
departments  
are very cozy  
with ICE and  
RTCC makes  
it easier for  
them to  
casually  
share  
surveillance  
data. And,  
RTCC means  
ICE is able to  
search  
nationwide  
databases of  
surveillance  
data  
including  
data from  
police  
departments  
in  
Washington  
State, other  
states with  
“sanctuary”  
laws, and  
non-police  
entities  
including the  
King County  
Housing  
Authority.  
RTCC  
software was  
used by  
police to spy  
on  
“immigration  
protests”

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|                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>RTCC<br/>software<br/>companies<br/>like Fusus<br/>rely on private<br/>consumers to<br/>expand the<br/>camera<br/>network<br/>which gather<br/>enough data<br/>to reveal<br/>sensitive<br/>personal<br/>inform</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                             |
| 7<br>2                                                                                                                                                                                                                | <p>Threat of<br/>harm to<br/>abortion and<br/>gender-<br/>affirming<br/>healthcare<br/>Many anti-<br/>abortion<br/>states,<br/>including<br/>neighboring<br/>Idaho, have<br/>passed<br/>bounty hunter<br/>laws. This<br/>creates a<br/>market and<br/>demand to<br/>hunt down<br/>this data for<br/>people<br/>believed to<br/>have gone to<br/>Seattle to get<br/>reproductive<br/>healthcare. If<br/>SPD switches<br/>over to a<br/>cloud-hosted<br/>RTCC<br/>database, we<br/>enable the<br/>criminalizatio<br/>n of those<br/>seeking</p> | <p>Threat of<br/>harm to all<br/>people<br/>exercising<br/>First<br/>Amendment<br/>Rights of free<br/>speech,<br/>public protest<br/>and assembly<br/>Seattle has a<br/>long history of<br/>participatory<br/>democracy<br/>dating at<br/>least as far<br/>back as the<br/>1919 general<br/>strike. Seattle<br/>has seen<br/>mass<br/>protests for<br/>labor rights,<br/>abortion<br/>rights, anti-<br/>war protests,<br/>and protests<br/>around issues<br/>of<br/>international<br/>trade<br/>policies, and<br/>most recently<br/>mass<br/>demonstratio</p> | <p>Most people<br/>want to live<br/>their lives in<br/>peace and<br/>have no idea<br/>about the<br/>harms of this<br/>type of data<br/>collection. I<br/>doubt that<br/>many people<br/>will give input<br/>because they<br/>aren't experts<br/>in this type of<br/>technology<br/>and naively<br/>believe that it<br/>will make<br/>them safer.</p> | <p>A functioning<br/>democracy<br/>needs the<br/>population to<br/>feel more<br/>empowered,<br/>not less. This<br/>type of<br/>technology<br/>takes power<br/>away from<br/>individual<br/>citizens and<br/>gives it to who<br/>knows who--<br/>the highest<br/>bidder?</p> |
|                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>None</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                             |

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reproductive care. The rate of out-of-state abortions, those coming from other states to seek abortion in Washington, increased by 36% in 2023 and included 20 different states including neighboring Idaho and states as far away as Texas and Alabama. Anti-abortion groups have a history of using license plate data. RTCC software allows data to be shared across law enforcement agencies. Third party agencies in anti-abortion states could use this data to criminally prosecute those seeking abortion in Washington state. Recently an Idaho mother and son were charged with kidnapping for allegedly

ns advocating for a ceasefire in Gaza. Unfortunately, police violence against protesters is not unprecedented. After SPD's betrayal of the public trust in the summer of 2020, the city recently paid a \$10M settlement. Violence against protestors in 2020 is one of the principal reasons that Seattle remains under the consent decree that it has been under for excessive use of force since 2012. SPD has used existing surveillance systems to spy on peaceful protestors. During the 2020 protests for racial justice, SPD used live video

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|                |                 |
|----------------|-----------------|
| taking a       | streaming to    |
| minor across   | record          |
| state lines to | peaceful        |
| access         | protestors,     |
| abortion care  | and shared it   |
| in Oregon.     | with U.S.       |
| The state of   | Marshalls,      |
| Texas has      | Washington      |
| already        | State           |
| attempted to   | Department      |
| get data from  | of              |
| Seattle        | Corrections,    |
| Children's     | and to a        |
| Hospital for   | private citizen |
| any Texas      | volunteering    |
| residents      | at Seattle's    |
| receiving      | emergency       |
| gender-        | operations      |
| affirming      | center (EOC).   |
| care. As soon  | SPD has         |
| as SPD         | continued to    |
| switches over  | use existing    |
| to a cloud-    | surveillance    |
| hosted RTCC    | to spy on       |
| database, red  | protestors      |
| states will    | including       |
| start issuing  | including one   |
| subpoenas to   | on Sept. 23,    |
| access data    | 2023, that      |
| directly from  | called for      |
| Fusus.         | justice for the |
| Threat of      | death of        |
| harm to        | Jaahnavi        |
| women,         | Kandula, who    |
| sexual         | died Jan. 23,   |
| assault and    | 2023, as a      |
| stalking       | result of       |
| survivors, and | being hit by    |
| vulnerable     | SPD officer     |
| marginalized   | Kevin Dave      |
| community      | while driving   |
| residents      | his officer     |
| RTCC           | vehicle as      |
| software       | she walked      |
| enabled a      | through a       |
| Texas cop to   | marked          |
| search         | crosswalk.      |
| surveillance   | RTCC            |
| data from      | software is a   |
| across the     | vast network    |

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county, of cameras  
including which can  
Washington include  
State, other doorbell  
states with cameras,  
abortion drones,  
“sanctuary” robots, fixed  
laws, and surveillance  
non-police cameras,  
entities helicopters,  
including the hidden  
King County cameras,  
Housing police body  
Authority, for cameras, and  
someone that cameras in  
had an schools and  
abortion churches,  
RTCC among other  
software settings.  
makes it RTCC opens  
impossible to up the  
keep opportunity  
surveillance for those  
data from exercising  
ICE. Local dissent to be  
police tracked and  
departments targeted, and  
are very cozy risks the  
with ICE and threat of  
RTCC makes police  
it easier for retaliation.  
them to Surveillance  
casually is about the  
share power to  
surveillance watch and  
data. And, intervene in a  
RTCC means variety of  
ICE is able to situations,  
search whether  
nationwide criminal or  
databases of not, and  
surveillance surveillance  
data technology  
including has the  
data from potential to  
police have a  
departments chilling effect  
in on free  
Washington speech  
State, other rights. In 2021

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states with  
“sanctuary”  
laws, and  
non-police  
entities  
including the  
King County  
Housing  
Authority.  
RTCC  
software was  
used by  
police to spy  
on  
“immigration  
protests”  
RTCC  
software  
companies  
like Fusus  
rely on private  
consumers to  
expand the  
camera  
network  
which gather  
enough data  
to reveal  
sensitive  
personal  
information,  
including  
where  
someone  
lives, works,  
and their  
religious  
affiliation.  
Individuals,  
homeowner  
associations,  
or businesses  
that opt into  
RTCC may be  
able to  
access the  
data directly  
from the  
vendor.  
Hostile

LAPD  
requested  
bulk camera  
data targeting  
Black Lives  
Matter  
protesters. In  
New York City  
there is  
evidence that  
NYPD has  
used  
surveillance  
technology to  
surveille  
Black Lives  
Matter  
protesters.  
Creates a  
system ripe  
for abuse and  
potential to  
violate all  
residents’  
First and  
Fourth  
Amendment  
Rights  
Cloud-based  
software can  
be hacked.  
This  
happened in  
2021 when  
hackers  
gained  
access to  
Verkada -  
giving them  
access to  
150,000  
cameras  
inside  
schools,  
hospitals,  
gyms, police  
stations,  
prisons,  
offices and

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individuals  
 could access  
 data to stalk  
 or harass  
 individuals.  
 The threat to  
 vulnerable  
 communities  
 is NOT  
 hypothetical,  
 as seen by  
 the actions of  
 other law  
 enforcement  
 agencies:  
 NYP officers  
 used mass  
 surveillance  
 technology to  
 record and  
 monitor  
 everyone  
 parked in  
 front of a  
 mosque, and  
 Birmingham  
 police also  
 used this  
 technology, in  
 conjunction  
 with other  
 tools, to track  
 Muslim  
 residents.  
 Homeless  
 residents,  
 who have no  
 option for  
 privacy, are  
 likely to  
 become  
 targets of  
 mass  
 surveillance.  
 California is  
 using AI to  
 identify and  
 target its  
 homeless  
 residents.

women's  
 health clinics  
 RTCC  
 software  
 creates  
 conditions  
 that are ripe  
 for police  
 abuse, as it  
 provides  
 little, if any,  
 oversight for  
 how police  
 use it, little  
 documentati  
 on or  
 auditable  
 logs, and few  
 transparency  
 mechanisms.  
 RTCC  
 software like  
 Fusus  
 recruits a vast  
 assortment of  
 privately  
 owned  
 cameras that  
 allow the  
 company to  
 bypass laws  
 and  
 restrictions  
 that normally  
 limit police,  
 including  
 viewing  
 camera  
 footage  
 without a  
 warrant or  
 ongoing  
 consent from  
 the owner.  
 The risk is not  
 hypothetical  
 as seen by  
 other law  
 enforcement  
 agencies: In

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|                 |                |
|-----------------|----------------|
| Threat of       | Pasco          |
| harm to         | County,        |
| immigrants      | Florida,       |
| ICE has a       | which          |
| history of      | operates an    |
| terrorizing     | RTCC, the      |
| immigrant       | sheriff's      |
| communities.    | office's       |
| Jurisdictions   | predictive     |
| that do not     | policing       |
| use local       | system         |
| resources to    | encouraged     |
| enforce         | officers to    |
| federal         | continuously   |
| immigration     | monitor and    |
| laws have       | harass         |
| lower rates of  | residents for  |
| crime,          | minor code     |
| poverty, and    | violations     |
| unemployme      | such as        |
| nt than those   | missing        |
| that chose to   | mailbox        |
| collaborate. It | numbers and    |
| was with this   | overgrown      |
| knowledge       | grass.         |
| that the Keep   | SPD has a      |
| Washington      | track record   |
| Working Act     | of officers    |
| was passed      | abusing their  |
| to prevent      | access to      |
| data sharing    | surveillance   |
| between         | technology. In |
| immigration     | 2021 SPD       |
| and local law   | Officer        |
| enforcement.    | Swartz used    |
| RTCC            | police data to |
| software like   | stalk his ex-  |
| Fusus can       | girlfriend; in |
| turn any        | 2020, an       |
| camera into     | officer        |
| an automated    | accessed       |
| license plate   | confidential   |
| readers         | information    |
| (ALPRs).        | about a        |
| By moving to    | domestic       |
| a cloud-        | violence       |
| based           | investigation  |
| platform,       | and shared it  |
| Customs and     | with           |
| Border          | someone        |

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Control (CBC) involved; and  
and ICE can just last year,  
access an officer  
automated performed an  
license plate unauthorized  
reader data search for  
directly; personal  
circumventin reasons to  
g Washington reveal a  
State Law. citizen's  
ICE has a firearm  
practice of ownership.  
accessing The  
data directly privatization  
from private of policing  
ALPR represented  
surveillance by relying on  
companies private  
that market consumers to  
their expand the  
products to camera  
police, in network  
order to undermines  
circumvent democratic  
any local values,  
sanctuary effectively  
laws. excluding  
Seattle  
residents  
from being  
able to  
provide input  
and oversight  
on the  
growing  
Seattle  
surveillance.

This takes  
away our  
liberty and  
privacy for  
living normal  
legal lives.  
The  
government  
does not have  
the right to  
use any kind  
of cameras to  
watch our

7  
3

Because it  
has gotten  
out of hand  
and gone too  
far it needs to  
be stopped  
altogether.  
Government  
can not be  
trusted to use  
it legally. It is

Personal  
rights and  
liberties.

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| people. That is destroying the rights we were given in the constitution. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | abusive. So no.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7<br>4                                                                   | The City Council is attempting to move the on-premise RTCC database to an off premise, cloud-hosted database managed by a third-party, private company. This change will enable other states to circumvent WA state's Shield Law and Keep WA Working Act, which are meant to protect both people seeking reproductive healthcare and immigrant workers. SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being | Threat of harm to abortion and gender-affirming healthcare Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. If SPD switches over to a cloud-hosted RTCC database, we enable the criminalization of those seeking reproductive care. The rate of out-of-state abortions, those coming from other states to seek abortion in | Threat of harm to immigrants ICE has a history of terrorizing immigrant communities. Jurisdictions that do not use local resources to enforce federal immigration laws have lower rates of crime, poverty, and unemployment than those that chose to collaborate. It was with this knowledge that the Keep Washington Working Act was passed to prevent data sharing between immigration and local law enforcement. RTCC software like Fusus can turn any camera into an automated license plate readers (ALPRs). | Creates a system ripe for abuse and potential to violate all residents' First and Fourth Amendment Rights Cloud-based software can be hacked. This happened in 2021 when hackers gained access to Verkada - giving them access to 150,000 cameras inside schools, hospitals, gyms, police stations, prisons, offices and women's health clinics RTCC software creates conditions that are ripe for police abuse, as it provides little, if any, oversight for |
|                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | There are MANY effective tools the city could use to decrease community violence Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents. | Washington, increased by 36% in 2023 and included 20 different states including neighboring Idaho and states as far away as Texas and Alabama. Anti-abortion groups have a history of using license plate data. RTCC software allows data to be shared across law enforcement agencies. Third party agencies in anti-abortion states could use this data to criminally prosecute those seeking abortion in Washington state. Recently an Idaho mother and son were charged with kidnapping for allegedly taking a minor across state lines to access abortion care in Oregon. The state of Texas has already | By moving to a cloud-based platform, Customs and Border Control (CBC) and ICE can access automated license plate reader data directly; circumventing Washington State Law. ICE has a practice of accessing data directly from private ALPR surveillance companies that market their products to police, in order to circumvent any local sanctuary laws. The department gets a lot of use out of this data, as seen by them running thousands of searches of ALPR databases in a single month as early as 2019. ICE's utilization of this data shows the | how police use it, little documentation on or auditable logs, and few transparency mechanisms. RTCC software like Fusus recruits a vast assortment of privately owned cameras that allow the company to bypass laws and restrictions that normally limit police, including viewing camera footage without a warrant or ongoing consent from the owner. The risk is not hypothetical as seen by other law enforcement agencies: In Pasco County, Florida, which operates an RTCC, the sheriff's office's predictive policing system encouraged | Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. |
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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>attempted to get data from Seattle Children's Hospital for any Texas residents receiving gender-affirming care. As soon as SPD switches over to a cloud-hosted RTCC database, red states will start issuing subpoenas to access data directly from Fusus. Threat of harm to women, sexual assault and stalking survivors, and vulnerable marginalized community residents RTCC software enabled a Texas cop to search surveillance data from across the county, including Washington State, other states with abortion "sanctuary" laws, and non-police</p> | <p>degree of risk it poses to vulnerable communities. Threat of harm to all people exercising First Amendment Rights of free speech, public protest and assembly. Seattle has a long history of participatory democracy dating at least as far back as the 1919 general strike. Seattle has seen mass protests for labor rights, abortion rights, anti-war protests, and protests around issues of international trade policies, and most recently mass demonstrations advocating for a ceasefire in Gaza. Unfortunately, police violence against protesters is not unprecedented</p> | <p>officers to continuously monitor and harass residents for minor code violations such as missing mailbox numbers and overgrown grass. SPD has a track record of officers abusing their access to surveillance technology. In 2021 SPD Officer Swartz used police data to stalk his ex-girlfriend; in 2020, an officer accessed confidential information about a domestic violence investigation and shared it with someone involved; and just last year, an officer performed an unauthorized search for personal reasons to reveal a citizen's firearm ownership.</p> |
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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>entities including the King County Housing Authority, for someone that had an abortion RTCC software makes it impossible to keep surveillance data from ICE. Local police departments are very cozy with ICE and RTCC makes it easier for them to casually share surveillance data. And, RTCC means ICE is able to search nationwide databases of surveillance data including data from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.</p> | <p>ed. After SPD’s betrayal of the public trust in the summer of 2020, the city recently paid a \$10M settlement. Violence against protestors in 2020 is one of the principal reasons that Seattle remains under the consent decree that it has been under for excessive use of force since 2012. SPD has used existing surveillance systems to spy on peaceful protestors. During the 2020 protests for racial justice, SPD used live video streaming to record peaceful protestors, and shared it with U.S. Marshalls, Washington State Department of</p> | <p>The privatization of policing represented by relying on private consumers to expand the camera network undermines democratic values, effectively excluding Seattle residents from being able to provide input and oversight on the growing Seattle surveillance apparatus. RTCC software like Fusus continually adds new image recognition algorithms and integrations with third-party applications via the software’s AI capabilities. This continuous introduction of new and unvetted surveillance tools would be in violation</p> |
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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RTCC software was used by police to spy on “immigration protests” RTCC software companies like Fusus rely on private consumers to expand the camera network which gather enough data to reveal sensitive personal information, including where someone lives, works, and their religious affiliation. Individuals, homeowner associations, or businesses that opt into RTCC may be able to access the data directly from the vendor. Hostile individuals could access data to stalk or harass individuals. The threat to vulnerable communities is NOT | Corrections, and to a private citizen volunteering at Seattle’s emergency operations center (EOC). SPD has continued to use existing surveillance to spy on protestors including including one on Sept. 23, 2023, that called for justice for the death of Jaahnavi Kandula, who died Jan. 23, 2023, as a result of being hit by SPD officer Kevin Dave while driving his officer vehicle as she walked through a marked crosswalk. RTCC software is a vast network of cameras which can include doorbell cameras, drones, robots, fixed surveillance cameras, helicopters, hidden | of Seattle’s Surveillance Ordinance. Surveillance technology will NOT aid law enforcement in solving crime. The 2024 paper that SPD cites states that RTCC “appeared to have a relatively smaller impact on violent crime clearance (5% increase),” other studies of RTCC show no effect on violent crime clearance rates. In a 40 year systematic review with meta-analysis of the efficacy of CCTV the authors concluded there were “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of |
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hypothetical, as seen by the actions of other law enforcement agencies: NYP officers used mass surveillance technology to record and monitor everyone parked in front of a mosque, and Burmingham police also used this technology, in conjunction with other tools, to track Muslim residents. Homeless residents, who have no option for privacy, are likely to become targets of mass surveillance. California is using AI to identify and target its homeless residents.

cameras, police body cameras, and cameras in schools and churches, among other settings. RTCC opens up the opportunity for those exercising dissent to be tracked and targeted, and risks the threat of police retaliation. Surveillance is about the power to watch and intervene in a variety of situations, whether criminal or not, and surveillance technology has the potential to have a chilling effect on free speech rights. In 2021 LAPD requested bulk camera data targeting Black Lives Matter protesters. In New York City there is evidence that NYPD has

CCTV has yet to develop.” Only 1% to 0.2% of ALPR captured license plates are either on a hot list or associated with any crime. RTCC software is expensive RTCC software are subscription products meaning the city will have to pay for it every single year. RTCC software, and other companies selling subscriptions , operate on the land-and-expand strategy where it starts off small with a city to get its proverbial foot in the door and then increases the amount the city is buying from them every year. In other words, a for profit company will be pushing Seattle to

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used surveillance technology to surveil Black Lives Matter protesters. spend even more money on its products every year. The city cannot afford this ineffective and expensive technology - especially in light of the fact that Seattle is anticipating a \$250 million shortfall in 2025. Looking at four other US cities that have deployed RTCCs, the average cost is \$7.16 per person. With Seattle's 2020 population of 737,015, this would put the full-scale (post-pilot-phase) RTCC deployment by SPD in the ballpark of \$5.3 million, not including the additional costs for the CCTV and ALPR expansion. Even the paper referenced by

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SPD in the SIR mentions the "substantial costs associated with RTCCs, with initial costs ranging between several hundred thousand dollars to \$11 million".

|                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                      |                                                         |
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| <p>This change will enable other states to circumvent WA state's Shield Law and Keep WA Working Act, which are meant to protect both people seeking reproductive healthcare and immigrant workers.</p> <p>SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being obtained from third parties or legal requests from those</p> | <p>Threat of harm to immigrants ICE has a history of terrorizing immigrant communities. Jurisdictions that do not use local resources to enforce federal immigration laws have lower rates of crime, poverty, and unemployment than those that chose to collaborate. It was with this knowledge that the Keep Washington Working Act was passed to prevent data sharing between immigration and local law enforcement.</p> | <p>Creates a system ripe for abuse and potential to violate all residents' First and Fourth Amendment Rights</p> <p>Cloud-based software can be hacked. This happened in 2021 when hackers gained access to Verkada - giving them access to 150,000 cameras inside schools, hospitals, gyms, police stations, prisons, offices and women's health clinics</p> <p>RTCC</p> | <p>There are MANY effective tools the city could use to decrease community violence</p> <p>Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeeper's Collective</p> <p>There is no value to the proposed change, only harm.</p> | <p>Protect our rights, do not make the proposed change. Use options that have been proven to make a positive difference instead.</p> | <p>Drop this proposal. NO cloud-based offsite RTCC!</p> |
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| outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents. | RTCC software like Fusus can turn any camera into an automated license plate readers (ALPRs). By moving to a cloud-based platform, Customs and Border Control (CBC) and ICE can access automated license plate reader data directly; circumventing Washington State Law. ICE has a practice of accessing data directly from private ALPR surveillance companies that market their products to police, in order to circumvent any local sanctuary laws. The department gets a lot of use out of this data, as seen by them running thousands of searches of | software creates conditions that are ripe for police abuse, as it provides little, if any, oversight for how police use it, little documentation on or auditable logs, and few transparency mechanisms. RTCC software like Fusus recruits a vast assortment of privately owned cameras that allow the company to bypass laws and restrictions that normally limit police, including viewing camera footage without a warrant or ongoing consent from the owner. The risk is not hypothetical as seen by other law enforcement agencies: In Pasco County, | coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime. |
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| <p>n of those seeking reproductive care.</p> <p>The rate of out-of-state abortions, those coming from other states to seek abortion in Washington, increased by 36% in 2023 and included 20 different states including neighboring Idaho and states as far away as Texas and Alabama.</p> <p>Anti-abortion groups have a history of using license plate data. RTCC software allows data to be shared across law enforcement agencies. Third party agencies in anti-abortion states could use this data to criminally prosecute those seeking abortion in Washington state.</p> <p>Recently an Idaho</p> | <p>ALPR databases in a single month as early as 2019. ICE's utilization of this data shows the degree of risk it poses to vulnerable communities. Threat of harm to all people exercising First Amendment Rights of free speech, public protest and assembly</p> <p>Seattle has a long history of participatory democracy dating at least as far back as the 1919 general strike. Seattle has seen mass protests for labor rights, abortion rights, anti-war protests, and protests around issues of international trade policies, and most recently mass demonstrations advocating</p> | <p>Florida, which operates an RTCC, the sheriff's office's predictive policing system encouraged officers to continuously monitor and harass residents for minor code violations such as missing mailbox numbers and overgrown grass.</p> <p>SPD has a track record of officers abusing their access to surveillance technology. In 2021 SPD Officer Swartz used police data to stalk his ex-girlfriend; in 2020, an officer accessed confidential information about a domestic violence investigation and shared it with someone involved; and just last year,</p> | <p>Both violent crime and property crime can be reduced by community investments. Investments restoring vacant land and community non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes.</p> <p>Many communities across the country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community.</p> <p>Violent crime can be reduced by investments in mental health treatment, providing substance-</p> |
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| <p>mother and son were charged with kidnapping for allegedly taking a minor across state lines to access abortion care in Oregon.</p> <p>The state of Texas has already attempted to get data from Seattle Children's Hospital for any Texas residents receiving gender-affirming care. As soon as SPD switches over to a cloud-hosted RTCC database, red states will start issuing subpoenas to access data directly from Fusus.</p> <p>Threat of harm to women, sexual assault and stalking survivors, and vulnerable marginalized community residents</p> <p>RTCC software enabled a</p> | <p>for a ceasefire in Gaza.</p> <p>Unfortunately , police violence against protesters is not unprecedented.</p> <p>ed. After SPD's betrayal of the public trust in the summer of 2020, the city recently paid a \$10M settlement.</p> <p>Violence against protesters in 2020 is one of the principal reasons that Seattle remains under the consent decree that it has been under for excessive use of force since 2012.</p> <p>SPD has used existing surveillance systems to spy on peaceful protestors. During the 2020 protests for racial justice, SPD used live video</p> | <p>an officer performed an unauthorized search for personal reasons to reveal a citizen's firearm ownership.</p> <p>The privatization of policing represented by relying on private consumers to expand the camera network undermines democratic values, effectively excluding Seattle residents from being able to provide input and oversight on the growing Seattle surveillance apparatus.</p> <p>RTCC software like Fusus continually adds new image recognition algorithms and integrations with third-party applications via the</p> | <p>abuse-treatment facilities, and access to affordable housing.</p> <p>Poverty and income inequality are associated with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence.</p> <p>Opening libraries and expanding library hours both reduce violence and property crimes.</p> |
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Texas cop to search surveillance data from across the county, including Washington State, other states with abortion “sanctuary” laws, and non-police entities including the King County Housing Authority, for someone that had an abortion

RTCC software makes it impossible to keep surveillance data from ICE. Local police departments are very cozy with ICE and RTCC makes it easier for them to casually share surveillance data. And, RTCC means ICE is able to search nationwide databases of surveillance data including data from

streaming to record peaceful protestors, and shared it with U.S. Marshalls, Washington State Department of Corrections, and to a private citizen volunteering at Seattle’s emergency operations center (EOC).

SPD has continued to use existing surveillance to spy on protestors including one on Sept. 23, 2023, that called for justice for the death of Jaahnavi Kandula, who died Jan. 23, 2023, as a result of being hit by SPD officer Kevin Dave while driving his officer vehicle as she walked through a marked crosswalk.

RTCC software is a vast network

software’s AI capabilities. This continuous introduction of new and unvetted surveillance tools would be in violation of Seattle’s Surveillance Ordinance.

Surveillance technology will NOT aid law enforcement in solving crime.

The 2024 paper that SPD cites states that RTCC “appeared to have a relatively smaller impact on violent crime clearance (5% increase),” other studies of RTCC show no effect on violent crime clearance rates.

In a 40 year systematic review with meta-analysis of the efficacy of CCTV the

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| <p>police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.</p> <p>RTCC software was used by police to spy on “immigration protests”</p> <p>RTCC software companies like Fusus rely on private consumers to expand the camera network which gather enough data to reveal sensitive personal information, including where someone lives, works, and their religious affiliation. Individuals, homeowner associations, or businesses that opt into RTCC may be able to</p> | <p>of cameras which can include doorbell cameras, drones, robots, fixed surveillance cameras, helicopters, hidden cameras, police body cameras, and cameras in schools and churches, among other settings.</p> <p>RTCC opens up the opportunity for those exercising dissent to be tracked and targeted, and risks the threat of police retaliation.</p> <p>Surveillance is about the power to watch and intervene in a variety of situations, whether criminal or not, and surveillance technology has the potential to have a chilling effect on free speech</p> | <p>authors concluded there were “no significant effects observed for violent crime” and “a body of research on the investigatory benefits of CCTV has yet to develop.”</p> <p>Only 1% to 0.2% of ALPR captured license plates are either on a hot list or associated with any crime.</p> <p>RTCC software is expensive</p> <p>RTCC software are subscription products meaning the city will have to pay for it every single year.</p> <p>RTCC software, and other companies selling subscriptions , operate on the land-and-expand strategy where it starts off</p> |
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access the data directly from the vendor. Hostile individuals could access data to stalk or harass individuals. The threat to vulnerable communities is NOT hypothetical, as seen by the actions of other law enforcement agencies: NYP officers used mass surveillance technology to record and monitor everyone parked in front of a mosque, and Burmingham police also used this technology, in conjunction with other tools, to track Muslim residents. Homeless residents, who have no option for privacy, are likely to become targets of mass surveillance. California is rights. In 2021 LAPD requested bulk camera data targeting Black Lives Matter protesters. In New York City there is evidence that NYPD has used surveillance technology to surveille Black Lives Matter protesters. small with a city to get its proverbial foot in the door and then increases the amount the city is buying from them every year. In other words, a for profit company will be pushing Seattle to spend even more money on its products every year. The city cannot afford this ineffective and expensive technology - especially in light of the fact that Seattle is anticipating a \$250 million shortfall in 2025. Looking at four other US cities that have deployed RTCCs, the average cost is \$7.16 per person. With Seattle's 2020 population of 737,015, this would put the full-scale

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| <p>using AI to identify and target its homeless residents.</p>                                                                                                                                                                                      | <p>(post-pilot-phase) RTCC deployment by SPD in the ballpark of \$5.3 million, not including the additional costs for the CCTV and ALPR expansion.</p> <p>Even the paper referenced by SPD in the SIR mentions the "substantial costs associated with RTCCs, with initial costs ranging between several hundred thousand dollars to \$11 million".</p> |                                                                                                                                                                                                                           |
| <p>I am concerned about putting seekers of reproductive care and gender affirming care, and immigrants at risk of having their personal identifying information shared with law enforcement.</p> <p>7 Washington<br/>6 State has the Shield Act</p> | <p>While I would say it could help prevent or discourage youth gun violence, I do not think that is the case. What would really prevent youth gun violence is economic and cultural opportunities for youth and connectedness amongst our communities.</p>                                                                                             | <p>Our country is in a slide toward authoritarianism. We see officers in face masks seizing people without judicial warrants authorizing them to do so, and we know those who are detained in this way are not having</p> |

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and Keep WA Working Act which were passed to protect people, but a cloud-based RTCC would not be bound to follow those laws. I am also concerned about surveillance data being used against people exercising their first amendment rights in protest against the government. Especially considering the current national climate in which people are being detained when they haven't broken the law, I am very much opposed to moving to a cloud-based RTCC that makes Washingtonian's data available to third parties and circumvents Washington's

Surveillance cameras do not create any of those things, and in fact they destabilize families and communities if they are used to aid in the detention of immigrants.

their due process rights honored. Seattle should not be taking any steps that can make it easier for our vulnerable neighbors to be tracked down and kidnapped by federal agents.

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more robust  
privacy and  
human rights  
protections.

RTCC, as it is  
currently  
being used  
and  
disseminated  
, seems fine,  
but an  
expansion to  
the "Cloud,"  
making it  
accessible by  
ICE, etc,  
would be very  
detrimental  
to our civil  
liberties,  
especially at  
this wrought  
time when  
ICE is being  
used as a  
secret police  
by a president  
who doesn't  
respect the  
rule of law

7 and the  
7 Constitution.

Over stepping

7 of citizens

8 privacy.

Vote it down

This cloud-  
based change  
(rather than  
the current  
on-premise  
system) will  
enable other  
states to  
share  
sensitive data  
about people  
and thereby  
circumvent

7  
9

NONE. We  
have systems  
in place that  
are safer for  
citizens that  
work well.  
And there are  
many other  
approaches,  
such as  
violence  
interruption  
programs,

Consider ALL  
of these  
points and  
the data that  
backs them  
up:  
<https://docs.google.com/document/d/14EhNiDMb7M8Z7TafyZsbxGOfdelDOGzR>

I feel so  
strongly  
about this,  
that if my  
representativ  
e (and the  
city-wide  
representativ  
es) vote in  
favor of this  
system, I will  
work very very  
hard to make

Why has City  
Council not  
publicized its  
consideration  
of this system  
more widely,  
held  
community  
hearings, and  
aggressively  
searched for  
feedback. (It  
has a ring of

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| <p>WA state's Shield Law and Keep WA Working Act, which are meant to protect people seeking reproductive healthcare, gender-affirming care, and immigrant workers. We know the pressures are real because data from Washington Medicaid Services has been shared with DHS and ICE WITHOUT its permission (or even knowledge).</p> <p>It would also be a threat to demonstrators exercising their first amendment right. (The city is still under a 2012(!) consent decree for abridging those rights!) Seattle already uses its existing surveillance system to watch</p> | <p>and investments in housing and mental health programs, that we could take to solve crime problems without the risks this system would place on us:</p> | <p>YxZNd3biwIE/edit?tab=t.0</p> | <p>sure they are not elected next time.</p> | <p>the House GOP passing legislation in the middle of the night.)</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------|-----------------------------------------------------------------------|

demonstrator  
s. We do NOT  
need to  
expand this  
capability.

Surveillance  
technology  
does NOT  
help law  
enforcement  
in fighting  
crime! The  
2024 paper  
that SPD cites  
states that  
RTCC  
"appeared to  
have a  
relatively  
smaller  
impact on  
violent crime  
clearance  
(5%  
increase),"  
other studies  
of RTCC show  
no effect on  
violent crime  
clearance  
rates. In a 40  
year  
systematic  
review with  
meta-  
analysis of  
the efficacy  
of CCTV the  
authors  
concluded  
there were  
"no  
significant  
effects  
observed for  
violent crime"  
and "a body  
of research  
on the

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| <p>investigatory benefits of CCTV has yet to develop.”</p> <p>RRTC is expensive! Let’s use the money toward solving our housing problems rather than surveilling Seattleites.</p> <p>PLEASE DO NOT FORCE SEATTLE TO PARTICIPATE IN A GROWING SURVEILLANCE STATE. DO NOT VOTE FOR RRTC SOFTWARE!</p> |                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                         |       |                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 8<br>0                                                                                                                                                                                                                                                                                              | <p>RTCC software like Fusus can turn any camera into an automated license plate readers (ALPRs). By moving to a cloud-based platform, Customs and Border Control (CBC) and ICE can access automated license plate reader data directly;</p> | <p>Yes, I do because it has been used in the past against peaceful protestors. Also, this data has been used to stalk and intimidate people for personal reasons. Outrageous! The data has also been used to monitor and track certain communities.</p> | None. | <p>Consider all the harms and the cost! There are many effective tools the city of Seattle could use instead that DO WORK! Violence interruption programs work such as the Regional Peacekeeper’s Collective which has reduced violence in the Rainier</p> | <p>Do not consign Seattle to becoming a Surveillance State! RTCC software like Fusu continually adds new image algorithms and integrations with third party applications via the software’s AI capabilities - a nightmare which will</p> <p>Yes! SPD already has a real time crime center. SPD’s existing RTCC (i-base) is on-premise, so it does not create the risk of data being obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to</p> |

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| circumventing Washington State Law. ICE has a practice of accessing data directly from private ALPR surveillance companies that market their products to police, in order to circumvent any local sanctuary laws. The department gets a lot of use out of this data, as seen by them running thousands of searches of ALPR databases in a single month as early as 2019. ICE's utilization of this data shows the degree of risk it poses to vulnerable communities. Threat of harm to all people exercising First Amendment Rights of free speech, | Moving to a cloud platform allows CBC and ICE to access automated license plate reader data directly which circumvents Washington State Law. SPD has used surveillance data to spy on protestors and shared it with US Marshalls, Wa State Dept of Corrections and a private citizen. RTCC opens up the opportunity for those exercising dissent to be tracked and targeted, and risks the threat of police retaliation. RTCC software like Fusus allow police to view camera footage without a warrant or ongoing consent from the owner. Surveillance technology will not aid | Beach neighborhood by 33%. Both violent crime and property crime can be reduced by community investments. Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities and access to affordable housing. Direct income support has been found to reduce firearm violence. Opening libraries and expanding library hours both reduce violence and property crimes. | result in multiple unforced errors not to mention invasion of privacy, violation of civil liberties at the very least. This continuous introduction of new and unvetted surveillance tools would be in violation of Seattle's Surveillance Ordinance. | obtain a cloud-based RTCC which would weaken state law and endanger women, trans folks, and immigrant residents. |
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public protest  
and assembly  
law  
enforcement  
in solving  
crime. RTCC  
deployment  
by SPD would  
cost  
approximatel  
y \$5.3Million  
dollars.

I do not want  
the  
surveillance  
state to be  
expanded,  
and I do not  
want cctv  
coverage of  
the city. It is  
absolutely  
reprehensible  
and will only  
lead to  
continued  
overpolicing  
of  
marginalized  
groups. I  
don't want  
my car to be  
tracked as I  
go from place  
to place, the  
police should

8 not have that  
1 data.

None  
whatsoever.

I am very  
concerned  
about  
expanded  
surveillance.  
The research I  
am aware of  
shows no  
public safety  
benefits, and  
meanwhile  
are are  
increasingly

8  
2

The proposed  
expansion  
areas  
furthermore  
are clearly  
highly  
racialized.  
This is not  
okay.

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living in a  
police state. I  
want Seattle  
to be a  
community  
where  
everyone  
feels safe, but  
constantly  
under the  
microscope.

Data  
centralization  
and pooling is  
terrifying --  
with ICE  
tearing  
families apart  
and  
authorities  
from other  
states trying  
to enforce  
their  
draconian  
abortion  
control  
restrictions  
here, the best  
protection for  
Seattle's  
residents is  
data  
minimization.  
Don't collect  
data on us  
and above all  
do not plug  
that data into  
larger sharing  
networks.

I don't care if  
the tech is  
supposedly  
set up in a  
way that  
ICE/CBP  
would need a  
warrant to get  
to it. They  
have shown  
themselves to  
be  
completely  
untrustworthy  
and the only  
way to ensure  
that they  
can't get it is  
to not collect  
it --- or at the  
very least not  
put it out on  
the cloud.

It doesn't  
appear to be  
very effective  
according to  
the research  
that's been  
done on it.

I don't want  
to assist ICE  
in their  
detention of  
people  
especially the  
way they've  
offered

Not enough  
to out weigh  
its cons.

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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

no legal  
process to  
many who are  
trying to obey  
our laws.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Threat of harm to abortion and gender-affirming healthcare. Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. If SPD switches over to a cloud-hosted RTCC database, we enable the criminalization of those seeking reproductive care. The rate of out-of-state abortions, those coming from other states to seek abortion in Washington, | Threat of harm to women, sexual assault and stalking survivors, and vulnerable marginalized community residents RTCC software enabled a Texas cop to search surveillance data from across the county, including Washington State, other states with abortion “sanctuary” laws, and non-police entities including the King County Housing Authority, for someone that had an abortion RTCC software makes it impossible to keep surveillance data from ICE. Local police | Threat of harm to immigrants ICE has a history of terrorizing immigrant communities. Jurisdictions that do not use local resources to enforce federal immigration laws have lower rates of crime, poverty, and unemployment than those that chose to collaborate. It was with this knowledge that the Keep Washington Working Act was passed to prevent data sharing between immigration and local law enforcement. RTCC software like Fusus can turn any camera into an automated license plate readers (ALPRs). By moving to | Threat of harm to all people exercising First Amendment Rights of free speech, public protest and assembly Seattle has a long history of participatory democracy dating at least as far back as the 1919 general strike. Seattle has seen mass protests for labor rights, abortion rights, anti-war protests, and protests around issues of international trade policies, and most recently mass demonstrations advocating for a ceasefire in Gaza. Unfortunately, police violence against protesters is not | Creates a system ripe for abuse and potential to violate all residents’ First and Fourth Amendment Rights Cloud-based software can be hacked. This happened in 2021 when hackers gained access to Verkada - giving them access to 150,000 cameras inside schools, hospitals, gyms, police stations, prisons, offices and women’s health clinics RTCC software creates conditions that are ripe for police abuse, as it provides little, if any, oversight for how police use it, little | Surveillance technology will NOT aid law enforcement in solving crime. The 2024 SPD cites states that RTCC “appeared to have a relatively smaller impact on violent crime clearance (5% increase),” other studies of RTCC show no effect on violent crime clearance rates. In a 40 year systematic review with meta-analysis of the efficacy of CCTV the authors concluded there were “no significant effects observed for violent crime” and “a body of research on the | There are MANY effective tools the city could use to decrease community violence Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| increased by 36% in 2023 and included 20 different states including neighboring Idaho and states as far away as Texas and Alabama. Anti-abortion groups have a history of using license plate data. RTCC software allows data to be shared across law enforcement agencies. Third party agencies in anti-abortion states could use this data to criminally prosecute those seeking abortion in Washington state. Recently an Idaho mother and son were charged with kidnapping for allegedly taking a minor across state lines to access abortion care in Oregon. The state of Texas has already attempted to | departments are very cozy with ICE and RTCC makes it easier for them to casually share surveillance data. And, RTCC means ICE is able to search nationwide databases of surveillance data including data from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority. RTCC software was used by police to spy on “immigration protests” RTCC software companies like Fusus rely on private consumers to expand the camera network which gather | a cloud-based platform, Customs and Border Control (CBC) and ICE can access automated license plate reader data directly; circumventing Washington State Law. ICE has a practice of accessing data directly from private ALPR surveillance companies that market their products to police, in order to circumvent any local sanctuary laws. The department gets a lot of use out of this data, as seen by them running thousands of searches of ALPR databases in a single month as early as 2019. ICE’s utilization of this data shows the degree of risk | unprecedented. After SPD’s betrayal of the public trust in the summer of 2020, the city recently paid a \$10M settlement. Violence against protestors in 2020 is one of the principal reasons that Seattle remains under the consent decree that it has been under for excessive use of force since 2012. SPD has used existing surveillance systems to spy on peaceful protestors. During the 2020 protests for racial justice, SPD used live video streaming to record peaceful protestors, and shared it with U.S. Marshalls, Washington State Department | documentation on or auditable logs, and few transparency mechanisms. RTCC software like Fusus recruits a vast assortment of privately owned cameras that allow the company to bypass laws and restrictions that normally limit police, including viewing camera footage without a warrant or ongoing consent from the owner. The risk is not as seen by other law enforcement agencies: In Pasco County, Florida, which operates an RTCC, the sheriff’s office’s predictive policing system encouraged officers to continuously | investigatory benefits of CCTV has yet to develop.” Only 1% to 0.2% of ALPR captured license plates are either on a hot list or associated with any crime. | their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime. Both violent crime and property crime can be reduced by community investments. Investments restoring vacant land |
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## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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| <p>get data from Seattle Children's Hospital for any Texas residents receiving gender-affirming care. As soon as SPD switches over to a cloud-hosted RTCC database, red states will start issuing subpoenas to access data directly from Fusus.</p> | <p>enough data to reveal sensitive personal information, including where someone lives, works, and their religious affiliation. Individuals, homeowner associations, or businesses that opt into RTCC may be able to access the data directly from the vendor. Hostile individuals could access data to stalk or harass individuals. The threat to vulnerable communities is NOT hypothetical, as seen by the actions of other law enforcement agencies: NYP officers used mass surveillance technology to record and monitor everyone parked in front of a mosque, and Birmingham</p> | <p>it poses to vulnerable communities.</p> | <p>of Corrections, and to a private citizen volunteering at Seattle's emergency operations center (EOC). SPD has continued to use existing surveillance to spy on protestors including one on Sept. 23, 2023, that called for justice for the death of Jaahnavi Kandula, who died Jan. 23, 2023, as a result of being hit by SPD officer Kevin Dave while driving his officer vehicle as she walked through a marked crosswalk. RTCC software is a vast network of cameras which can include doorbell cameras, drones, robots, fixed surveillance cameras, helicopters,</p> | <p>monitor and harass residents for minor code violations such as missing mailbox numbers and overgrown grass. SPD has a track record of officers abusing their access to surveillance technology. In 2021 SPD Officer Swartz used police data to stalk his ex-girlfriend; in 2020, an officer accessed confidential information about a domestic violence investigation and shared it with someone involved; and just last year, an officer performed an unauthorized search for personal reasons to reveal a citizen's firearm ownership. The privatization</p> | <p>and community non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes. Many communities across the country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community. Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities, and access to affordable housing. Poverty and income inequality are associated</p> |
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| <p>police also used this technology, in conjunction with other tools, to track Muslim residents. Homeless residents, who have no option for privacy, are likely to become targets of mass surveillance. California is using AI to identify and target its homeless residents.</p> | <p>hidden cameras, police body cameras, and cameras in schools and churches, among other settings. RTCC opens up the opportunity for those exercising dissent to be tracked and targeted, and risks the threat of police retaliation. Surveillance is about the power to watch and intervene in a variety of situations, whether criminal or not, and surveillance technology has the potential to have a chilling effect on free speech rights. In 2021 LAPD requested bulk camera data targeting Black Lives Matter protesters. In New York City there is evidence that</p> | <p>of policing represented by relying on private consumers to expand the camera network undermines democratic values, effectively excluding Seattle residents from being able to provide input and oversight on the growing Seattle surveillance apparatus. RTCC software like Fusus continually adds new image recognition algorithms and integrations with third-party applications via the software's AI capabilities. This continuous introduction of new and unvetted surveillance tools would be in violation of Seattle's</p> | <p>with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence. Opening libraries and expanding library hours both reduce violence and property crimes.</p> |
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|                                                                                                                                                                                                                                                |                                                                                                                                                                                                         | NYPD has used surveillance technology to surveille Black Lives Matter protesters. | Surveillance Ordinance.                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                              |
| It is unnecessary and an over reach of power. The SPD should not be in cooperation with ICE agents, rounding up many innocent people due to their skin color or physical presentation. This is Orwellian and a very wrong use of technology... | In this case, I do not. I mentioned in the CCTV answer that if there was a child or elder with dementia it might be helpful to identify where they were last seen, but beyond that, it becomes fascist. |                                                                                   | Keep it human scale. People to people. If someone is committing a crime, then deal with it. Keep ICE out as much as possible. ICE agents are the minions of a racist, fascist administratio n that wants to go back to pre civil war times with all the power centered in white men who dictate what religion people should adhere to. | Look into your hearts. If you have or had loved ones who were terrified that they would lose everything they've worked for and been hard working contributors to our society, wouldn't you be frightened for them? Its really not a stretch. |
| we do not want ICE violating the privacy of the people of seattle. We do not want them harming or harassing the people of seattle. they do not need more                                                                                       | i'm sure there is value, but ICE has no problem breaking laws. Why make it easier for them?                                                                                                             |                                                                                   | consider who we are as a city                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                              |

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| ways of violating us                                                                                                                                                                                                            |                           |                                                                                                                                                                                                              |                                                                                                                                                                                                                                                     |
| Privacy.<br>Government using information against the people.                                                                                                                                                                    |                           |                                                                                                                                                                                                              |                                                                                                                                                                                                                                                     |
| 8                                                                                                                                                                                                                               | Enabling                  |                                                                                                                                                                                                              | Reduce                                                                                                                                                                                                                                              |
| 8                                                                                                                                                                                                                               | autocracy.                | None                                                                                                                                                                                                         | surveillance                                                                                                                                                                                                                                        |
| This data is not for use to increase the surveillance of people in our community based on personal characteristics of race, lifestyle choices or                                                                                |                           |                                                                                                                                                                                                              |                                                                                                                                                                                                                                                     |
| 8                                                                                                                                                                                                                               | immigration               |                                                                                                                                                                                                              | Do not share                                                                                                                                                                                                                                        |
| 9                                                                                                                                                                                                                               | status.                   |                                                                                                                                                                                                              | This data with ICE.                                                                                                                                                                                                                                 |
| Surveillance state seems against our freedoms when there are plenty of cameras outside businesses. Making the people of seattle more scared, and people already have an issue being filmed in public. I don't see how they will |                           |                                                                                                                                                                                                              |                                                                                                                                                                                                                                                     |
| 9                                                                                                                                                                                                                               | protect us                | Who is going to be watching?<br>Where is this content stored?<br>What value does the city see?<br>Is this a direct response to Trump's comments about a surveillance state?                                  | Listen to the people as the state still has power. Don't feel pressured into something the people don't want or our representatives become complacent and part of the problem. Introduce benefit to the people and be more outright in how you plan |
| 0                                                                                                                                                                                                                               | further. Face recognition | How the people of seattle feel as a majority democratic city when the surveillance state was introduced by Trump. Based on his recent actions I doubt the city's intentions of implementing this in Seattle. |                                                                                                                                                                                                                                                     |

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|        | used<br>wrongly/unjustly. I have<br>experienced<br>crime in this<br>area where<br>there would<br>have                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                     | to use all of<br>this.                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 9<br>1 | My concerns<br>are frankly<br>innumerable. SPD's<br>existing RTCC<br>(iBase) is on-<br>premise, so it<br>doesn't<br>create the<br>risk of data<br>being<br>obtained<br>from third<br>parties or<br>legal requests<br>from those<br>outside<br>Washington<br>state. A<br>cloud-based<br>RTCC creates<br>the risk of<br>data<br>exposure,<br>which would<br>put<br>essentially<br>every person<br>in Seattle at<br>risk should a<br>bad actor get<br>their hands<br>on the<br>collected<br>information.<br>SPD already<br>has what it<br>needs in its<br>current<br>system, and<br>there is no<br>benefit to | Please see<br>these links<br>with more<br>information<br>on the<br>dangers of<br>this<br>technology:<br><a href="https://www.wired.com/story/license-plate-reader-alpr-surveillance-abortion/">https://www.wired.com/story/license-plate-reader-alpr-surveillance-abortion/</a><br><a href="https://www.the-guardian.com/us-news/2023/nov/01/idaho-mother-son-kidnap-charges-abortion">https://www.the-guardian.com/us-news/2023/nov/01/idaho-mother-son-kidnap-charges-abortion</a><br><a href="https://www.the-stranger.com/news/2023/12/21/79315926/texas-tried-to-get-seattle-childrens-hospital-health-records-on-trans-patients">https://www.the-stranger.com/news/2023/12/21/79315926/texas-tried-to-get-seattle-childrens-hospital-health-records-on-trans-patients</a><br><a href="https://www.realchange.org/news/2024/08/07/inside-spd-s-">https://www.realchange.org/news/2024/08/07/inside-spd-s-</a> | Absolutely<br>none. | Please<br>consider the<br>cost of this<br>technology -<br>both the<br>literal dollars,<br>and the<br>human price<br>as well. The<br>negative<br>impact of<br>cloud-based<br>data storage<br>cannot be<br>overstated.<br>Please make<br>the right<br>choice to<br>protect the<br>people you<br>were elected<br>to serve. You<br>are in a<br>unique<br>position to<br>make a real<br>difference -<br>do not<br>squander that<br>responsibility. |

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anyone  
 except those  
 who would  
 exploit our  
 private data  
 in expanding  
 the system to  
 a cloud-  
 based  
 structure.  
 These bad  
 actors are not  
 theoretical -  
 Washington  
 State passed  
 our Shield  
 Law to  
 protect those  
 seeking  
 necessary  
 life-saving  
 healthcare  
 from other  
 states, and  
 there are  
 bounty  
 hunters and  
 agencies in  
 other states  
 trying to track  
 those people  
 down to jail  
 them, or  
 worse.  
 Moving to a  
 cloud-based  
 RTCC system  
 will do  
 nothing but  
 undermine  
 the very  
 important  
 sanctuary  
 laws we have  
 passed, and it  
 is not an  
 exaggeration  
 to say that  
 this choice  
 would cost

use-aerial-  
 surveillance-  
 during-2020-  
 protests  
<https://www.thesun.com/story/news/politics/2024/01/25/79356578/seattle-settles-2020-protest-lawsuit-for-10-million-nitrogen-execution-scheduled-for-tonight-no-medical-care-for-floridas-transgender-people-https://www.aclu.org/news/civil-liberties/major-hack-of-camera-company-offers-four-key-lessons-on-surveillance-https://www.eff.org/deeplinks/2023/05/neighborhood-watch-out-cops-are-incorporating-private-cameras-their-real-time-https://projects.tampabay.com/projects/2020/investigations/polic>

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lives. ICE is already active in our communities, kidnapping residents who are here legally and have committed no crimes. These are our friends and neighbors who are disappearing, not faceless criminals, and families are being destroyed by these actions. Children are unable to go to school for fear of raids, and their parents can't so much as shop for groceries without fear. Cloud-based RTCC would enable ICE to continue and expend their illegal operations, and I very much doubt that they will stop with their current targets. History has shown over and over and

e-pasco-sheriff-targeted/intelligence-led-policing/  
<https://www.seattle.gov/Documents/Departments/OPA/ClosedCasesSummaries/2020OPA-0455ccs042621.pdf>  
<https://www.vera.org/communities-violence-intervention-programs-explained>

over and over  
again that  
this kind of  
violence will  
expand  
unchecked if  
given the  
opportunity,  
and cloud-  
based RTCC  
is exactly the  
kind of  
opportunity  
that will allow  
them to target  
anyone they  
want, for any  
reason,  
regardless of  
the law.  
Expanded  
surveillance  
has a chilling  
effect on first  
amendment  
rights, and  
puts  
American  
citizens in  
danger simply  
for speaking  
their minds.  
This affects  
EVERYONE,  
not just a few  
groups. Every  
single person  
in Seattle will  
be in  
significantly  
greater  
danger and at  
risk of  
physical  
threat with  
expanded  
surveillance.  
If we knew we  
could trust  
the

information collected would be used for public good, this might be a different story - but we know from experience and history that it will not be.

RTCC is also expensive. Looking at four other US cities that have deployed RTCCs, the average cost is \$7.16 per person. With Seattle's 2020 population of 737,015, this would put the full-scale (post-pilot-phase) RTCC deployment by SPD in the ballpark of \$5.3 million, not including the additional costs for the CCTV and ALPR expansion. On top of this, it has also not proven to be effective at reducing crime, making it

essentially  
useless for its  
stated  
purpose.

There are  
many proven  
ways to  
reduce crime,  
like violence  
interruption  
programs and  
community-  
led safety  
initiatives.

Why would  
we put more  
money  
towards  
something  
that does not  
work and  
makes us all  
less safe,  
when we  
could instead  
put that  
funding  
towards  
proven  
methods that  
reduce  
poverty,  
provide  
crucial  
resources to  
those that  
need them,  
and improve  
all of our  
lives?

Please  
protect your  
city, your  
community,  
and  
yourselves by  
refusing to  
expand RTCC.

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|        | I believe this adversely impacts our BIPOC and potentially our LGBTQIA+ communities.                                                                                                                                                                                                                                                                                                                | This is NOT about crime prevention. A much better and proven solution is to use the same monies and resources towards intervention and support solutions. | None | See #2 | Remember, this is NOT about crime "prevention".                                                                                                                                                                                                                                                                                                          | This is NOT a proven crime prevention solution. Whereas intervention and support solutions are. | N/A |
| 9<br>3 | I am concerned that this technology will be used to track people's movements across the city and in turn, be used to track down and harm marginalized communities. I am concerned that this technology will be used to assist ICE kidnappings, punish those seeking healthcare, track/disappear the unhoused, and harm the LGBT+ community. This technology has no positive benefit. SPD has proven |                                                                                                                                                           | None |        | If this city is truly as welcoming as it claims to be, it will oppose this technology. Do you want to lead a city whose values are not in line with its actions? Again, I emphasize that this technology will harm marginalized communities including BIPOC, immigrants, the unhoused, and the LGBT community. I thought I was supposed to be safe here. |                                                                                                 |     |

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| <p>themselves to be incompetent, ineffective, and consistently incapable of protecting our community. Why should I believe that they have our best interests at heart? This technology will do nothing but harm marginalized communities and I vehemently oppose its use and implementation.</p> |                                                                                                                                                                                                              |                                                                                                                                      |                                                                                                                              |                                                                                                                                                        |                                                                                                                                             |
| <p>It is a violation of privacy, and too far along the road of a surveillance state. I do not feel comfortable having my tax dollars support a third-party surveillance company. I would rather have better</p>                                                                                  | <p>This technology takes out the human element, which is already way too far gone. Again, I would rather support the training and development of human beings to deal with our complex issues as a city.</p> | <p>Police officers are already stretched so thin. I want their focus to actually be on protection and service, not surveillance.</p> | <p>Don't spend money on this technology! As a voter, I am paying attention and will vote and act and canvas accordingly.</p> | <p>Invest in human beings, and do more to provide a social safety net for the citizens of our city. Don't spend money on this invasive technology.</p> | <p>Thank you for the hard work of city government. Please do the right thing and help public servants by supporting them in other ways.</p> |
| <p>We are not living in normal times. Do not</p>                                                                                                                                                                                                                                                 | <p>AI is not ready for prime time. It's not the time to</p>                                                                                                                                                  | <p>Please -- don't capture tons of unnecessary</p>                                                                                   | <p>These times are not business as usual.</p>                                                                                |                                                                                                                                                        |                                                                                                                                             |

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| increase surveillance and accessible storage at this time.                                                                                                                                                                                                                                                                                                                                                                                                                                    | watch everyone doing everything. The use is too easily shifted | data on a maybe or what-if basis                                                                                                                                                                                               | Democracy is eroding. This is not the time to increase searchable/s hareable data.                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                   |
| 1) This is warrantless dragnet surveillance. The RTCC storing data for 30 days means SPD would be mapping people's lives being able to figure out where people live, where they work, where they worship, the routes they take to work, etc. This map would be available to SPD & everyone with access to SPD's data. There is no legitimate use for this kind of map, all it does is create conditions where abuses are both easy & incredibly disastrous. These abuses aren't hypothetical. |                                                                | None, RTCC don't reduce crime or increase clearance rates, it doesn't even make people feel safer. This has been studies repeated. Lots of studies showing this were submitted just last year when SPD was first asking for it | How do you think any guardrails will keep the Trump Administratio n & ICE from accessing this data given their constant & blatant disregard for the law?<br><br>How do you justify increasing surveillance now when ICE is kidnapping people on Seattle's streets with the assistance of SPD?<br><br>How is there money for even more mass surveillance when the city is facing a budget deficit? Especially, when this is shown to not | Keeping people in Seattle safe would require removing this & other surveillance by SPD (ex. CCTV & ALPRs) and using that money to fund programs that are shown to reduce violence. Removing RTCC alone would free up millions of dollars per year that could go to programs that reduce violence. |

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In recent weeks we've seen small-ish abuses like yet another SPD officer getting caught using a police database to stalk someone to massive like ICE & cops looking for people who've had abortions accessing nationwide surveillance databases. Those nationwide searches included data from Washington State despite the state's Keep Washington Work and Shield laws. Nashville abandoned its pursuit of FUSUS (SPD's RTCC) in April due to these risks. <https://nashvillebanner.com/2025/04/28/metro-nashville-fusus-freddie-oconnell/>

reduce violence. Why do things that are proven to reduce violence (ex. housing access, food access, mental health access, libraries, & violence intervention programs) constantly get defunded while surveillance that doesn't reduce violence gets more money?

How do you think having Seattle under surveillance by the Trump Administration & ICE will impact tourism?

How do you think installing more surveillance which makes people's brains act similar to psychosis will increase safety or reduce violence?

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The only reason reporters haven't discovered that SPD's existing data is being abused in nationwide searches like this is because SPD's CCTV & RTCC program has only been live for a month. There hasn't been any time for reporters, community members, anyone to get records on data access. There's barely been time for SPD's data to even be shared because it just went live at the end of May. SPD is ramming through this expansion before there's a chance for the community to see the full impacts of SPD's existing dragnet surveillance,

SPD storing this a private,

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for-profit  
company's  
cloud  
guarantees  
this data will  
be shared.  
These  
systems are  
built to make  
data sharing  
between  
agencies as  
frictionless as  
possible,  
that's part of  
the sales  
pitch.

This is  
functionally a  
secret  
expansion of  
surveillance.  
SPD has not  
done any  
community  
outreach to  
let the public  
know this is  
being  
considered.  
SPD hasn't  
even done a  
press release  
or a post on  
social media.  
The only  
reason  
people know  
this is  
happening is  
because  
community  
members  
found single  
Seattle IT  
webpage that  
mentions it &  
have spread  
the word.

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There cannot  
be any  
consent of  
the  
governed/co  
mmunity  
consent  
because SPD  
hasn't let  
them know it  
is happening.

Being  
subjected to  
constant  
surveillance  
is harmful.  
Whose  
Streets Our  
Streets  
identified the  
level of  
surveillance  
in Seattle as  
already  
having “a  
psychological  
effect on the  
people being  
surveilled”  
(<http://stopsurveillancecity.files.wordpress.com/2024/09/338c7-wsosautomationforcementsummary.pdf>) and that  
was before  
SPD  
launched its  
CCTV & RTCC  
pilot. The  
effect is that  
people's  
brains act in a  
manner  
similar to  
“psychosis

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

and social  
anxiety  
disorder”  
(<https://scitechdaily.com/what-happens-to-your-brain-when-you-know-youre-being-watched/>).  
Expanding  
surveillance  
will increase  
these  
impacts and  
make people  
less safe.

There is no  
reason to  
believe any  
information  
SPD has  
provided for  
this material  
update or the  
underlying  
SIR given  
SPD’s lengthy  
history of  
lying during  
the SIR  
process. Just  
last year, SPD  
definitely told  
the people of  
Seattle that it  
would not be  
actively  
monitoring  
CCTV  
cameras  
which was a  
lie, the  
minute the  
cameras were  
approved  
SPD

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

demanded  
more money  
from the city  
to hire people  
to do active  
monitoring  
claiming that  
was the only  
way for them  
to work. SPD  
has also lied  
in the SIR for  
FLIR  
([https://www.  
realchangenews.org/news/  
2024/08/07/i  
nside-spd-s-  
use-aerial-  
surveillance-  
during-2020-  
protests](https://www.realchangenews.org/news/2024/08/07/inside-spd-s-use-aerial-surveillance-during-2020-protests)), and  
just last  
month SPD  
provided  
misled  
people during  
the SIR for  
StarChase/pu  
rsuit  
mitigation  
trackers by  
claiming it  
was required  
to conform to  
WA law (The  
law does not  
say that, it  
says police  
departments  
should end  
each  
individual  
pursuit as  
soon as  
possible  
based on  
existing  
policies &  
technology,

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not that  
departments  
need to  
acquire new  
technologies)

The RTCC is  
an invasion of  
privacy that  
makes the  
city a more  
hostile place  
to live for  
normal  
people and  
doesn't make  
things any  
safer. As  
study after  
study has  
shown this  
kind of live  
surveillance  
is not a  
deterrent  
against crime  
but it does  
make quality  
of life worse  
for people  
who feel the  
constant  
surveillance.  
It's extremely  
unequitable  
disproportion  
ately  
affecting  
communities  
of color and  
poor people  
who live in  
high density  
areas. SPD  
has not  
earned the  
trust of the  
community to  
be  
continuously

It has no  
value to the  
people of  
Seattle, just  
value to SPD  
and business  
owners who  
benefit from  
repression  
and the  
increased  
hostility of  
public space

City  
leadership  
already  
ignored the  
clearly  
spoken voice  
of the people  
on RTCC  
once. SPD,  
SPOG, and  
the vendors  
who you are  
sending our  
hard earned  
tax dollars to  
want these  
surveillance  
programs but  
the people  
who you  
actually need  
to vote for you  
do not.  
Consider that  
expanding the  
RTCC once  
again goes  
against the  
clear will of  
the voting  
public as well  
as the city's  
own  
committees  
that provide  
recommenda  
tions on  
equity in  
policing.

9  
7

monitoring  
us, and if they  
had that trust  
they wouldn't  
need to. The  
RTCC also  
allows other  
agencies  
throughout  
the country to  
surveil us and  
make our  
expressed  
values  
around  
immigration  
and abortion  
access  
meaningless.  
By accepting  
the RTCC we  
invite other  
jurisdictions  
to exercise  
control over  
and surveil  
residents of  
our city  
including  
immigrants  
but also  
people who  
are coming  
here to  
access  
reproductive  
healthcare.  
The city  
cannot have a  
commitment  
to being a  
sanctuary city  
and  
upholding  
reproductive  
rights while  
allowing the  
RTCC

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SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, sexual assault and stalking survivors, transgender individuals, and lawful immigrants.

I don't see that the potential value of this technology is worth the risks to our civil rights. Please consider that the country already is quickly moving towards a fascist state. This technology will be used to further the agenda of a government intent on taking away the rights we have in a democratic society.

The City leadership should have as a top priority the protection of our democratic ideals, our civil rights and to keep our law enforcement agencies separate from national encroachments. Of course we want to reduce crime in our city, but not at the expense of our civil rights. Also, it seems that the City has made headway in reducing crime with the technology it already possesses. Please hire more police officers and reform criminal justice as necessary without adopting cloud based surveillance technology that will put us at such

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risk. Thank  
you.

|                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>As our<br/>country<br/>lurches<br/>towards<br/>autocratic<br/>politicized<br/>police state,<br/>NOW is not<br/>the time to<br/>expand police<br/>surveillance<br/>powers,<br/>especially if<br/>data is to be<br/>9 shared with<br/>9 ICE.</p>                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>I oppose<br/>increased<br/>surveillance<br/>of Seattle<br/>people. I fear<br/>it being used<br/>1 by feds to<br/>0 kidnap<br/>0 people</p>                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>It will be used<br/>to target<br/>minorities,<br/>especially by<br/>ICE. I believe<br/>there are<br/>better<br/>options for<br/>reducing<br/>crime. When<br/>information<br/>goes into the<br/>cloud, local<br/>organizations<br/>1 have less<br/>0 control over<br/>1 it.</p> | <p>None.</p> <p>Why don't we<br/>find better<br/>ways of<br/>preventing<br/>crime instead<br/>of setting up a<br/>big brother<br/>style system?<br/>There are too<br/>many ways<br/>for that sort of<br/>technology to<br/>be abused.</p> <p>What sort of<br/>city do we<br/>want? Do we<br/>want a city<br/>where<br/>everyone<br/>works<br/>together to<br/>make a safe<br/>and<br/>welcoming<br/>place to live<br/>or visit? Or do<br/>we want<br/>some weird<br/>police state<br/>where<br/>everyone<br/>knows we are<br/>being<br/>watched by</p> <p>Don't spend<br/>money on<br/>this. It won't<br/>have enough<br/>benefits to<br/>justify the<br/>cost.<br/>Technology<br/>ages out. In a<br/>few years, all<br/>of this tech<br/>will be<br/>obsolete.<br/>Lasting<br/>solutions<br/>involve<br/>people<br/>working<br/>together. It's a<br/>harder<br/>process and it</p> |

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|   |                                                                                                                                                                                                      |                                                                                                             |                                                                                                                                                                             |                                                                                                                                                                                                         |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                      |                                                                                                             | someone, but we don't who that someone is or what they might do with the information.                                                                                       | certainly isn't flashy. But I would sleep better knowing that I don't have to worry about folks being snatched off the street, or wondering who is creating a database for their own, illegal purposes. |
|   | Invasion of privacy.<br>Targeting of immigrants, queer people, bipoc, etc.<br>We should not support                                                                                                  |                                                                                                             |                                                                                                                                                                             |                                                                                                                                                                                                         |
| 1 | Trump's                                                                                                                                                                                              |                                                                                                             |                                                                                                                                                                             |                                                                                                                                                                                                         |
| 0 | targeting of                                                                                                                                                                                         |                                                                                                             |                                                                                                                                                                             |                                                                                                                                                                                                         |
| 2 | individuals.                                                                                                                                                                                         | We need to support our immigrant community.                                                                 | ICE is ripping families apart for no good reason other than quotas.                                                                                                         | I don't want Big Brother watching!                                                                                                                                                                      |
|   | Please do not expand the use of RTCC to a third party vendor. My concerns are for the privacy and safety of citizens who might be targeted by this technology allowing the possibility to circumvent |                                                                                                             |                                                                                                                                                                             |                                                                                                                                                                                                         |
| 1 | Washington                                                                                                                                                                                           |                                                                                                             |                                                                                                                                                                             |                                                                                                                                                                                                         |
| 0 | State's Shield                                                                                                                                                                                       |                                                                                                             |                                                                                                                                                                             |                                                                                                                                                                                                         |
| 3 | Law and Keep WA Working                                                                                                                                                                              | I see some value in in-house, well-controlled surveillance to help with crime prevention and investigation. | Consider the potential harm that could arise if RTCC surveillance was released into the hands of potentially violent persons outside of the control of local SPD authority. |                                                                                                                                                                                                         |

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|                                                                                                                                                                                                                                                                                                                                   |    |      |                                                       |  |    |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|------|-------------------------------------------------------|--|----|--|
| <p>Act. Allowing a third party vendor access to sensitive records is a step too far, and has been rejected by other jurisdictions out of concern for people's safety. With a third party vendor, there is a greater possibility of data being accessed by those who might cause harm to potential persons under surveillance.</p> |    |      |                                                       |  |    |  |
| <p>A Real Time Crime Center is a software that uploads all of Seattle's surveillance to a cloud-based platform making it available to ICE, Customs and Border Patrol, and other law enforcement agencies across the country that will have access to the</p>                                                                      |    |      |                                                       |  |    |  |
| 104                                                                                                                                                                                                                                                                                                                               | No | None | <p>It should not be made available to ICE and CPB</p> |  |    |  |
|                                                                                                                                                                                                                                                                                                                                   |    |      | No                                                    |  | No |  |

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data without  
a warrant.

SPD already  
has a real  
time crime  
center. SPD's  
existing RTCC  
(iBase) is on-  
premise, so it  
doesn't  
create the  
risk of data  
being  
obtained  
from third  
parties or  
legal requests  
from those  
outside  
Washington  
state. There is  
no reason for  
SPD to obtain  
a cloud-  
based RTCC  
which would  
weaken state  
laws and  
endanger  
women, trans  
folks, and  
immigrant  
residents.

A move to the  
cloud creates  
a system ripe  
for abuse and  
potential to  
violate all  
residents'  
First and  
Fourth  
Amendment  
Rights  
-Cloud-based

1 software can  
0 be hacked.  
5 This  
happened in

The paper  
referenced by  
SPD in the  
SIR mentions  
the  
"substantial  
costs  
associated  
with RTCCs,  
with initial  
costs ranging  
between  
several  
hundred  
thousand  
dollars to \$11  
million".

We should  
redploy  
funds to  
solutions that  
work.  
-Both violent  
crime and  
property  
crime can be  
reduced by  
community  
investments.  
Investments  
restoring  
vacant land  
and  
community  
non-profits  
that tackle  
violence and  
build  
community  
lead to  
reductions in  
both violent  
crime and  
property  
crimes.  
-Poverty and  
income

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|                                                                                                                                                                                                   |                                                                                                                                                                                 |                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>2021 when hackers gained access to Verkada - giving them access to 150,000 cameras inside schools, hospitals, gyms, police stations, prisons, offices and women's health clinics.</p>          |                                                                                                                                                                                 | <p>inequality are associated with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence.</p> |
| <p>I worry about it circumventing protections that Washington has in place and endangers anyone on trumpian hate lists (trans folks, abortion seekers, immigrants). Please make it harder for</p> | <p>Lots of value! But also easy to make mistakes that could put many vulnerable people in very real danger. Let's make sure each step in new tech does more good than harm.</p> | <p>Privacy, civil rights, avoiding federal surveillance or making it easy for law enforcement to collaborate with authoritarian tactics of fear and surveillance</p>                                                                                              |

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folks outside  
Washington  
state to  
surveille our  
citizens.

I'm  
concerned for  
our privacy.  
I'm  
concerned  
that these are  
mostly in  
POC areas.  
But mostly  
I'm alarmed  
that we are  
collecting  
data that can  
be terribly  
misused. It  
could be  
subpoenaed  
to prosecute  
people  
coming from  
out of state  
for abortion  
or gender-  
affirming  
care. Who  
knows what  
Trump and  
1 his cronies  
0 might do with  
7 them?

none  
whatsoever.

Consider that  
the adverse  
uses of these  
data would  
be far worse  
than any  
possible  
benefit.

this will

1 endanger  
0 targeted  
8 groups

none, not  
needed

do not  
approve

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|                                                                                                                                                                                                                                                                                                                                                                                             |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>I am against surveillance in Seattle. I do not want police or artificial intelligence systems to watch me and my family as we go about our lives. Surveillance leads to self-censoring and a loss of individuality, creativity, and privacy.</p> <p>I do not want the federal government to legally or illegally access surveillance</p> <p>1 data<br/>0 collected in<br/>9 Seattle.</p> | <p>None.</p>                                          | <p>The harmful impacts of surveillance and policing fall disproportionately on individuals who have already experienced violence from white supremacy and colonialism. This program is structurally racist.</p> <p>City leaders should stop pursuing these police technologies and instead use the millions they would cost on public-health-based safety and community supports, like housing, food access, and libraries.</p> |
| <p>Inappropriate to expand these</p> <p>1 systems given<br/>1 recent federal<br/>0 overreach.</p>                                                                                                                                                                                                                                                                                           |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>The overpolicing of communities is quite concerning.</p>                                                                                                                                                                                                                                                                                                                                 | <p>I see no use of this overreaching surveillance</p> | <p>Please consider the effects it may have on our communities to be</p>                                                                                                                                                                                                                                                                                                                                                         |

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|                                                                                                                                                                                                    |                |                                                                                                                  |    |                                                                                              |    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------------------------------|----|----------------------------------------------------------------------------------------------|----|
| With only the use of constant surveillance we cannot understand the broader story of the situations we see unfold. I fear that this data will be used to wrongfully convict our friends and family |                | in the hands of the police                                                                                       |    | constantly watched by authority.                                                             |    |
| I oppose the increased use of surveillance on my community. Linking up police access to the existing cameras and adding new one adds risk to all our communities especially                        |                | Too much constitutional ly protected private and personal data becomes available to all types of law enforcement |    | Protecting our constitutional rights. Stopping ICE, keeping the government out of our lives. |    |
| 1 immigrant,                                                                                                                                                                                       |                | SPD, ICE,                                                                                                        |    |                                                                                              |    |
| 1 queer and                                                                                                                                                                                        |                | KSC, national                                                                                                    |    |                                                                                              |    |
| 2 POC people                                                                                                                                                                                       | Do not do this | guard, WSP                                                                                                       | No | As a voter I have been watching your votes and am disappointed in what you have been doing.  | No |
| Surveillance data should be held within the jurisdiction responsible for it. Saying it would be cheaper to hold the data                                                                           |                |                                                                                                                  |    |                                                                                              |    |
| 1 in a                                                                                                                                                                                             |                |                                                                                                                  |    |                                                                                              |    |
| 1 contractor's                                                                                                                                                                                     |                |                                                                                                                  |    |                                                                                              |    |
| 3 facility means                                                                                                                                                                                   |                |                                                                                                                  |    |                                                                                              |    |
| that the city                                                                                                                                                                                      |                |                                                                                                                  |    |                                                                                              |    |

|                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                           |                                                                                                                                                                              |                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                     |                                                                                                                                                                         |                                                                                                                                                                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>doesn't value the security of the surveillance data. Once the contractor has our data stored out of state, it can be shared with other entities based on local laws, rather than subject to the laws we enacted to protect the data from exposing people in Washington to risks from outside jurisdictions.</p> |                                                                                                                                                                                                                                                                           |                                                                                                                                                                              |                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                     |                                                                                                                                                                         |                                                                                                                                                                                                |
| <p>This technology infringes on the civil liberties of people who have committed no crimes, and exacerbates the already disproportionate targeting of the young, people of color, LGTBQIA people, etc, and does not require a</p>                                                                                  | <p>WA state and Seattle are facing a budget crisis and are facing record costs due to lawsuits against SPD and other agencies. There is no reason to believe that this will reduce crime or increase case resolution and every reason to believe it will be abused in</p> | <p>Negative value due to monetary cost for products, loss of civil liberties, liability issues, and other harms to our communities with no proven value to reduce crime.</p> | <p>There are other solutions to crime that actually work. I realize these often involve giving money to community organizations rather than the police but maybe, given SPDs track record, we shouldn't give them anything that they can abuse and get themselves</p> | <p>This proposal would result in so much liability for the city and SPD. Once you start collecting data on people do you have a plan in place to protect that data? Do you have a plan in place to ensure it will not be abused, or disclosed without authorization ? What will</p> | <p>It is hard to truly appreciate the value of privacy until it is lost, and even harder to get it back, if it is possible at all. Do you want this as your legacy?</p> | <p>Please please please do literally anything else with the city's money. It would be more beneficial to turn it into confetti for a parade or to set it on fire than to spend it on this.</p> |

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|                       |                                                                                |                         |                             |
|-----------------------|--------------------------------------------------------------------------------|-------------------------|-----------------------------|
| warrant to be shared. | ways that end up costing even more money, and result in harm to our community. | into more trouble with. | you do if those plans fail? |
|-----------------------|--------------------------------------------------------------------------------|-------------------------|-----------------------------|

In a time of extreme authoritarian overreach on the part of the federal government, any additional surveillance and data gathering at the local level (such as expanded RTCC) runs the risk of that data being acquired and  
1 misused by  
1 the federal  
5 government.

There is little or no demonstrated value in the expansion of RTCC

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RTCC

software is a  
cloud-based  
software  
platform  
designed for  
real-time  
crime centers  
to integrate  
multiple  
surveillance  
technologies  
such as  
cameras,  
automated  
license plate  
readers  
(ALPRs),  
CCTV, among  
other police  
surveillance  
tools. RTCC  
software like  
Fusus can  
turn any  
camera into  
an automated  
license plate  
readers  
(ALPRs)  
which gather  
enough data  
to reveal  
sensitive  
personal  
information,  
including  
where  
someone  
lives, works,  
and their  
religious  
affiliation.

The City  
Council is  
1 attempting to  
1 move the on-  
6 premise  
RTCC

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database to  
an off  
premise,  
cloud-hosted  
database  
managed by a  
third-party,  
private  
company.  
This change  
will enable  
other states  
to circumvent  
WA state's  
Shield Law  
and Keep WA  
Working Act,  
which are  
meant to  
protect both  
people  
seeking  
reproductive  
healthcare  
and  
immigrant  
workers.

SPD already  
has a real  
time crime  
center. SPD's  
existing RTCC  
(iBase) is on-  
premise, so it  
doesn't  
create the  
risk of data  
being  
obtained  
from third  
parties or  
legal requests  
from those  
outside  
Washington  
state. There is  
no reason for  
SPD to obtain  
a cloud-

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based RTCC  
which would  
weaken state  
laws and  
endanger  
women, trans  
folks, and  
immigrant  
residents.

|                                                                                                                               |                                                                                                                      |                                                        |
|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| False<br>positives and<br>the possible<br>addition of AI<br>tools reduces<br>transparency<br>1 and<br>1 accountabilit<br>7 y. |                                                                                                                      | The lack of<br>trust in SPD<br>will only get<br>worse. |
| With the<br>FASCIST<br>regime<br>currently<br>1 occupying<br>1 our white<br>8 house, NOW<br>is NOT the                        | Where is the<br>moral voice in<br>the<br>implementati<br>on of these --<br>I can't<br>imagine there<br>has been any. |                                                        |

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time to create tools that they will use in any of their witch hunts, ie towards trans, immigrants, and political enemies.  
NO, just NO!!

Please stop, don't do this. And don't do this in our names, with our taxes!

I am concerned the cloud-based storage part of this system will endanger women, trans folks, and immigrant residents by making data and surveillance available to out of state and federal government agencies. This is not a hypothetical – this is happening, and WILL happen to sensitive data on Seattle residents and visitors if we continue to contract for-profit company with out of state data storage servers vulnerable to secret

I don't see that this tech has any value. It is very expensive, it throws even more of our city budget to the police department which directly results in less funding for the social services and programs that actually keep our neighborhood safe.

SPD has a track record of officers abusing their access to surveillance technology. SPD has lost the trust of wide swaths of Seattle residents because of their violent, escalating crowd-control tactics, poor leadership, right-wing police union, and significant representation of white supremacists within SPD ranks. What possible reason do we have to trust SPD with more surveillance tech? Why should we believe SPD will do what they say they

The current city leadership seems to believe they have a "mandate" from the voters regarding public safety. However, I would like them to consider that perhaps they have misinterpreted this "mandate" as they have run roughshod over democratic processes (such as public comment and community advisory committees) that have been informing them that their police legislation – RTCC and CCTV, SOAP

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| <p>subpoenas<br/>and<br/>governmental<br/>pressure to<br/>share that<br/>data in ways<br/>that will be<br/>both legal<br/>and illegal.</p>                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>as they<br/>collect and<br/>store this<br/>sensitive<br/>data?</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>and SODA<br/>zones, &amp;etc. –<br/>are deeply<br/>unpopular<br/>and not what<br/>the people of<br/>Seattle want<br/>for our city.</p> |
| <p>Availability of<br/>this<br/>information</p> <p>1 from license<br/>2 plate ID to<br/>0 ICE etc.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                           |
| <p>- Footage is<br/>stored for 30<br/>days. Why is<br/>it stored for<br/>so long?<br/>- Nashville<br/>abandoned<br/>its pursuit on<br/>FUSUS (the<br/>RTCC SPD<br/>uses) in April<br/>2025 because<br/>it didn't<br/>believe any<br/>guardrails<br/>would keep<br/>the Trump<br/>Administratio<br/>n &amp; ICE from<br/>accessing it.<br/>- By moving to<br/>a cloud-<br/>based<br/>platform,<br/>Customs and<br/>Border<br/>Control (CBC)<br/>and ICE can<br/>access<br/>automated<br/>license plate<br/>1 reader data<br/>2 directly;<br/>1 circumventin</p> | <p>Richmond,<br/>CA has<br/>chosen to<br/>invest in<br/>violence<br/>interruption<br/>and other<br/>community-<br/>led safety<br/>initiatives and<br/>they have<br/>seen a drop in<br/>the number of<br/>homicides.<br/>This is in<br/>contrast to<br/>neighboring<br/>cities like<br/>Oakland and<br/>San<br/>Francisco<br/>that have<br/>increased<br/>their police<br/>budgets and<br/>have not seen<br/>a decline in<br/>violent crime.<br/>Why are we<br/>privileging<br/>strategies<br/>that have not<br/>worked to<br/>reduce</p> |                                                                                                                                           |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

g Washington  
State Law.  
- RTCC  
software like  
Fusus  
continually  
adds new  
image  
recognition  
algorithms  
and  
integrations  
with third-  
party  
applications  
via the  
software's AI  
capabilities.  
This  
continuous  
introduction  
of new and  
unvetted  
surveillance  
tools would  
be in violation  
of Seattle's  
Surveillance  
Ordinance.

violent crime  
over ones  
that do?

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

I have significant concerns about the use of cloud-based RTCC solution will put sensitive data about Seattle residents and visitors within the reach of the Federal government, circumventing our state's Shield Law and Keep WA Working Act. This is concerning a wide range of people, but particularly so for immigrants, gender minorities, those seeking abortions, and protestors exercising their first amendment rights.

1 Additionally, the use of  
2 solutions such as  
2 Fusus to expand police surveillance technologies, in particular to include the use of private security

A benefit to public safety has been claimed, however there is not evidence to support a significant improvement to public safety.

The privacy and safety of Seattle residents, and those visiting Seattle, in the face of hostility from the Federal government and law enforcement from other states.

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

cameras,  
represents a  
highly  
concerning  
increase in  
the police's  
ability to  
conduct  
wide-scale  
surveillance  
of Seattle  
residents.

|                                                                                                                                                                                                         |                                                                                                                       |                                                                                                                                                                                                     |                                                                                                                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Increases to surveillance technology, at this time in history, is a terrible idea. The federal government will seek any existing tool to harm immigrants, their political opponents, and people seeking | Whatever good this could do, it will not outweigh the harm. Not now, not with this administration. Possibly not ever. | Please consider every thing that is happening in our country right now. Our most vulnerable communities are under attack. I am legitimately afraid the US is on its way to becoming a dictatorship, | Seattle will NOT be a sanctuary city, or a refuge for LGBTQ+ people and people seeking abortions if there is city wide surveillance. |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>abortion and<br/>gender care.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>if it isn't one<br/>already. I am<br/>already<br/>scared and<br/>increased<br/>surveillance<br/>is only going<br/>to make<br/>things worse.</p>                                  |
| <p>I'm very<br/>concerned<br/>that this<br/>technology<br/>can be<br/>accessed by<br/>a national<br/>database,<br/>making it<br/>available to<br/>ICE, Border<br/>Patrol, and<br/>law<br/>enforcement<br/>across the<br/>country. This<br/>poses grave<br/>danger to all<br/>of us in these<br/>rife political<br/>times with a<br/>Federal<br/>Government<br/>pushing the<br/>boundaries of<br/>executive<br/>powers and<br/>overreach.<br/>I'm<br/>particularly<br/>concerned<br/>regarding the<br/>dangers<br/>posed by this<br/>technology<br/>for our<br/>marginalized<br/>communities<br/>(immigrants,<br/>transgender<br/>folks, and</p> | <p>I understand<br/>that this will<br/>add another<br/>tool in the<br/>'tool belt' of<br/>law<br/>enforcement .<br/>That said, the<br/>risks far<br/>outweigh the<br/>benefits.</p> |

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                                                            |                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>women). Is it not illegal in Washington State to share information with ICE? Does this technology not risk our status as a sanctuary state/city?</p>                                                                                                                                                    |                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>The further erosion of privacy. Use to target</p> <p>1 specific</p> <p>2 vulnerable</p> <p>5 groups.</p>                                                                                                                                                                                                |                                            | <p>Put civil liberties and democratic values first. Don't let fear guide your decision making, but principles. What is the highest and best good for all?</p> <p>Please protect our civil liberties. They are in grave danger at the moment and we need your help to maintain them. Thank you.</p> <p>Thank you for standing up for our citizenry!</p>                                                                                                                                                                         |
| <p>Major concerns. Mass surveillance, especially if the data gets into the hands of unaccountable and lawless government actors, is the antithesis to a free and democratic society. Right now the federal government is outright</p> <p>1 violating</p> <p>2 court orders</p> <p>6 and threatening to</p> | <p>The risks far outweigh the rewards.</p> | <p>How is the City of Seattle protecting residents against federal government overreach? How is the city protecting the human rights of its residents? What happens if this data gets into the hands of bad actors?</p> <p>We are living in a country with federal leadership that outright violating civil liberties, refusing to obey judicial orders, and is not giving immigrants due process before sending to overseas prisons. Does the city of Seattle really want to give the federal government more information</p> |

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                  |                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <p>send citizens to overseas prisons without due process. These cameras will help facilitate the human rights abuses of innocent individuals and people who should have a day in court to defend themselves.</p> |                                                                                                                                     | <p>that lead to the downfall of democracy and irrevocably ruins peoples lives?</p>                                                                                                                                                                                                                                                                                                                                                  |
| <p>Data from Seattle's surveillance should NOT be available to ICE or</p> <p>1 border patrol</p> <p>2 without a</p> <p>7 warrant.</p>                                                                            | <p>I'm fine with police accessing this data to help with crimes. However, this information should be only accessible to police.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>I am concerned that this could be used to violate the</p> <p>1 rights of</p> <p>2 people in</p> <p>8 Seattle.</p>                                                                                             | <p>The theoretical cases in which it could be helpful seem so unlikely that they are not worth mention.</p>                         | <p>Even where it's not being used, the existence of this technology could have a chilling effect on exercise of our First Amendment rights, and could make vulnerable people such as immigrants feel less safe and more</p> <p>How easy it would be for the data the City collects to be hacked, DOGE-ed, or otherwise leaked to entities that could use it in a harmful way.</p> <p>Please vote NO on surveillance technology.</p> |

limited in our  
communities.

|  |                                                                                                                                                                                                                                                                                                                                                     |                                                                   |      |                                                                                                    |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|------|----------------------------------------------------------------------------------------------------|
|  | Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. If SPD switches over to a cloud-hosted RTCC database, we enable the criminalization of those seeking reproductive care. | RTCC software was used by police to spy on "immigration protests" | None | We do not need more surveillance                                                                   |
|  | Without regulation and appropriate oversight, the overreach of MAGA states to use data to find individuals seeking reproductive care is my primary concern. Also, it is                                                                                                                                                                             | With this administration and city council, none                   |      | Use data!<br>Track results!<br>Be transparent about effectiveness /costs! Learn from other cities! |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

unclear to me  
how to keep  
this  
information  
from  
inappropriate  
use by ICE,  
rendering our  
vulnerable  
communities  
less safe and  
making  
Seattle less  
safe for all  
given  
proliferation  
of fear.

|             |                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                      |                                                                                           |    |                                                                            |     |     |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----|----------------------------------------------------------------------------|-----|-----|
| 1<br>3<br>1 | Traffic<br>cameras<br>should not be<br>incorporated<br>into SPD's<br>Real Time<br>Crime Center.<br>Increasing<br>surveillance<br>is an<br>infringement<br>on the privacy<br>of Seattle<br>residents. It<br>will allow<br>another<br>avenue for<br>federal<br>authorities<br>such as ICE<br>to track<br>individuals,<br>going against<br>Seattle's<br>supposed<br>status as a<br>Sanctuary<br>City. | Increased<br>surveillance<br>will likely<br>affect<br>marginalized<br>communities<br>at a<br>disproportion<br>ate level<br>compared to<br>white Seattle<br>citizens. | Traffic<br>cameras<br>should<br>remain as is<br>without being<br>implemented<br>into SPD. | No | Consider<br>divesting<br>funds from<br>SPD and into<br>social<br>services. | No. | No. |
|             | 1<br>3<br>2                                                                                                                                                                                                                                                                                                                                                                                        | Expanding<br>the<br>surveillance<br>capabilities                                                                                                                     | I do not want<br>to live in a city<br>that abets the<br>federal                           |    | Consider the<br>harm you'll be<br>inflicting,<br>which vastly              |     |     |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                        |                                                         |                                                                                                            |
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| of the city will only endanger its inhabitants, and will very likely be leveraged by state actors and agencies (i.e. ICE) to target immigrants and other vulnerable populations. Please do not move forward with this. | government in harming/targeting vulnerable communities. | outweighs the good these systems might do, and think about other areas that desperately need this funding. |
| There is already a real time crisis center. We do not need to partner with private companies that favor profit over any benefit to citizens.                                                                           | None. Do not give our data to non public entities.      | Imagine the misuse of this kind of amassing of data- the danger outweighs any benefit.                     |
| There is no need for a cloud-based RTCC, which would weaken state laws and endanger women, trans folks, and immigrant residents. It is expensive and a threat to our most vulnerable citizens.                         |                                                         | Think about who in Seattle is actually impacted by this. Think about our most vulnerable citizens.         |

Please  
carefully  
consider any  
unintended  
consequence  
s of moving  
the RTCC  
database to  
be a cloud-  
hosted  
database  
managed by a  
third-party,  
private  
company. As I  
understand it,  
this change  
will enable  
others to  
circumvent  
WA state's  
Shield Law  
and Keep WA  
Working Act,  
which are  
meant to  
protect both  
people  
seeking  
reproductive  
healthcare  
and  
immigrant  
workers.

SPD already  
has a real  
time crime  
center. SPD's  
existing RTCC  
(iBase) is on-  
premise, so it  
doesn't  
create the  
risk of data  
being  
1 obtained  
3 from third  
5 parties or  
legal requests

Please  
carefully  
consider any  
unintended  
consequence  
s of moving  
the RTCC  
database to  
be a cloud-  
hosted  
database  
managed by a  
third-party,  
private  
company.

from those  
outside  
Washington  
state. A  
cloud-based  
RTCC - at  
least at this  
moment in  
time - could  
weaken state  
laws and  
endanger  
women, trans  
folks, and  
immigrant  
residents.

Please  
carefully  
consider  
whether this  
is something  
that should  
be done now  
(or ever).

This  
technology  
allows bounty  
hunters and  
ICE agents to  
track  
immigrants,  
abortion  
seekers, and  
likely seekers  
of gender  
affirming  
care, or  
anyone else  
targeted by  
our currently  
hard right,  
fascism-

The value is  
to the current  
federal  
government's  
non-  
democratic  
intentions.  
While it may  
have some  
small use in  
local traffic  
safety, the  
risk to privacy  
far outweighs  
this.

As a fifth  
generation  
Washington  
resident, all  
proud  
Republicans,  
whose  
ancestors  
came here on  
the preacher  
train in the  
late 1800s, I  
feel I can  
speak for  
many when I  
say that this  
program is  
not aligned

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

inclined  
federal  
government.

even with the  
majority  
opinion  
among right  
wing folks  
here. We  
want our  
privacy, and  
we value it for  
others. Do  
not let the  
heat of  
today's  
political  
climate  
invade the  
needs of our  
state and the  
will of its  
majority - left  
and right alike  
- specially in  
Seattle,  
where we are  
a sanctuary  
city for a  
reason (the  
voting public  
has already  
extensively  
spoken on  
this issue).

That this will  
inflict more  
harm than  
good on our  
King County  
communities,  
especially in  
areas that are  
underprivileg  
ed and  
underserved-  
by  
encouraging  
police  
overstep and  
presence  
when it is not  
warranted.

None.

The current  
authoritarian  
use of power  
that is  
happening in  
the White  
House and  
how it has  
already been  
affecting our  
communities  
and  
endangering  
lives. If you  
truly want to  
protect  
Seattleites,  
please

Again, please  
think  
carefully  
about the  
times we are  
currently  
living in and  
whether you  
want to  
actually  
protect the  
people of  
Seattle, or  
potentially  
cause  
irreparable  
harm under

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Over surveillance at this dangerous time in our country will only harm our neighbors, and facilitate police cooperation with ICE or military forces/federal powers. What happens when they come for US citizens? Will this technology help to hand them over? If this is actually about protecting Seattleites, this is not the way. | consider whether this tool would actually do that or would potentially endanger us all through an overpowered surveillance system that could be easily wielded against its own people? Or taken over by federal authority when they come for our city? Please rise to meet this moment, as this moment is not normal and we are truly facing the threat of fascism. And a President who thinks himself a king and does not follow the law or Constitution. | the guise of "protection". |
| 1 I oppose a                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                            |
| 3 surveillance                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                            |
| 8 state                                                                                                                                                                                                                                                                                                                              | None                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                            |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1<br>3<br>9 | Nashville abandoned its pursuit on FUSUS (the RTCC SPD uses) in April 2025 because it didn't believe any guardrails would keep the Trump Administration & ICE from accessing it. Many anti-abortion states, including neighboring Idaho, have passed bounty hunter laws. This creates a market and demand to hunt down this data for people believed to have gone to Seattle to get reproductive healthcare. If SPD switches over to a cloud-hosted RTCC database, we enable the criminalization of those seeking reproductive care. The rate of out-of-state abortions, those coming | SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents. RTCC software like Fusus recruits a vast assortment of privately owned cameras that allow the company to bypass laws and restrictions that normally limit police, including viewing camera footage | I see no value in using this technology. | SPD's asked for these proposed material updates to the Surveillance Impact Reports for both their CCTV and Real-Time Crime Center (RTCC) 3 weeks after their CCTV and RTCC cameras went live on May 20, 2025 showing SPD never intended for this surveillance to be a short-term "pilot." SPD confirmed to Guy Oron that they have been providing "mutual aid" to ICE/Department of Homeland Security. Some of this "mutual aid" occurred while Interim Police Chief Shon Barnes was making the headline grabbing claim that he expects to go | The Community Surveillance Working Group's report on RTCC was "unsupportive of any ...deployment of the these two technologies [CCTV & RTCC]" due to "[t]he amount and urgency of the concerns and outstanding questions." The City leadership should not ignore the CSWG. | RTCC software are subscription products meaning the city will have to pay for it every single year. RTCC software, and other companies selling subscriptions, operate on the land-and-expand strategy where it starts off small with a city to get its proverbial foot in the door and then increases the amount the city is buying from them every year. In other words, a for profit company will be pushing Seattle to spend even more money on its products every year. The city cannot afford this ineffective and expensive technology - especially in light of the | There are MANY effective tools the city could use to decrease community violence besides increasing surveillance. Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| from other states to seek abortion in Washington, increased by 36% in 2023 and included 20 different states including neighboring Idaho and states as far away as Texas and Alabama. Anti-abortion groups have a history of using license plate data. RTCC software allows data to be shared across law enforcement agencies. Third party agencies in anti-abortion states could use this data to criminally prosecute those seeking abortion in Washington state. Recently an Idaho mother and son were charged with kidnapping for allegedly taking a minor across state lines to access abortion care in Oregon. | without a warrant or ongoing consent from the owner. The privatization of policing represented by relying on private consumers to expand the camera network undermines democratic values, effectively excluding Seattle residents from being able to provide input and oversight on the growing Seattle surveillance apparatus. RTCC software like Fusus continually adds new image recognition algorithms and integrations with third-party applications via the software's AI capabilities. This continuous introduction | to jail because he won't cooperate with the Trump Administration. SPD and Mayor Harrell refuse to respond to questions from Hard Pressed about how many times ICE has asked for data sharing. The only thing preventing ICE from accessing all of SPD's surveillance data (including 30 days of video and 90 days of license plate scans) is SPD's dubious claim that it will follow the Keep Washington Working Act & Washington Shield Law. Standing up to Trump means saying no to surveillance technology! | fact that Seattle is anticipating a \$250 million shortfall in 2025. Looking at four other US cities that have deployed RTCCs, the average cost is \$7.16 per person. With Seattle's 2020 population of 737,015, this would put the full-scale (post-pilot-phase) RTCC deployment by SPD in the ballpark of \$5.3 million, not including the additional costs for the CCTV and ALPR expansion. Even the paper referenced by SPD in the SIR mentions the "substantial costs associated with RTCCs, with initial costs ranging between several hundred thousand dollars to \$11 million". | Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and have not seen a decline in violent crime. Both violent crime and property crime can be reduced by community investments. Investments restoring vacant land and community |
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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The state of Texas has already attempted to get data from Seattle Children's Hospital for any Texas residents receiving gender-affirming care. As soon as SPD switches over to a cloud-hosted RTCC database, red states will start issuing subpoenas to access data directly from Fusus. RTCC software enabled a Texas cop to search surveillance data from across the county, including Washington State, other states with abortion "sanctuary" laws, and non-police entities including the King County Housing Authority, for someone that had an abortion.</p> | <p>of new and unvetted surveillance tools would be in violation of Seattle's Surveillance Ordinance. In a 40 year systematic review with meta-analysis of the efficacy of CCTV the authors concluded there were "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." Only 1% to 0.2% of ALPR captured license plates are either on a hot list or associated with any crime.</p> | <p>non-profits that tackle violence and build community lead to reductions in both violent crime and property crimes. Many communities across the country are making investments in preventative community-centered approaches and are seeing a reduction in crime and violence in the community. Violent crime can be reduced by investments in mental health treatment, providing substance-abuse-treatment facilities, and access to affordable housing. Poverty and income inequality are associated with violence, especially assault and</p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

ICE is  
terrorizing  
immigrant  
communities  
under Trump.  
The Keep  
Washington  
Working Act  
was passed  
to prevent  
data sharing  
between  
immigration  
and local law  
enforcement.  
RTCC  
software like  
Fusus can  
turn any  
camera into  
an automated  
license plate  
readers  
(ALPRs). By  
moving to a  
cloud-based  
platform,  
Customs and  
Border  
Control (CBC)  
and ICE can  
access  
automated  
license plate  
reader data  
directly;  
circumventin  
g Washington  
State Law.  
ICE has a  
practice of  
accessing  
data directly  
from private  
ALPR  
surveillance  
companies  
that market  
their  
products to

homicide.  
Inequality  
predicts  
homicides  
better than  
any other  
variable.  
Evidence  
supports that  
this is a  
causal link.  
And direct  
income  
support has  
been found to  
reduce  
firearm  
violence.  
Opening  
libraries and  
expanding  
library hours  
both reduce  
violence and  
property  
crimes.

police, in order to circumvent any local sanctuary laws. The department gets a lot of use out of this data, as seen by them running thousands of searches of ALPR databases in a single month as early as 2019. ICE's utilization of this data shows the degree of risk it poses to vulnerable communities. RTCC means ICE is able to search nationwide databases of surveillance data including data from police departments in Washington State, other states with "sanctuary" laws, and non-police entities including the King County Housing Authority.

Surveillance technology has the potential to have a chilling effect on free speech rights. RTCC software was used by police to spy on "immigration protests." In 2021 LAPD requested bulk camera data targeting Black Lives Matter protesters. In New York City there is evidence that NYPD has used surveillance technology to surveille Black Lives Matter protesters. Homeless residents, who have no option for privacy, are likely to become targets of mass surveillance. California is using AI to identify and target its homeless residents.

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

SPD has a track record of officers abusing their access to surveillance technology. In 2021 SPD Officer Swartz used police data to stalk his ex-girlfriend; in 2020, an officer accessed confidential information about a domestic violence investigation and shared it with someone involved; and just last year, an officer performed an unauthorized search for personal reasons to reveal a citizen's firearm ownership.

It has no real benefit and will harm  
1 women and  
4 minorities the  
0 most

I see no value except to strip individuals of their privacy

People in WA deserve their privacy and do not need their information uploaded to ICE so they

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                    | can be<br>illiegalley<br>abducted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>Data privacy is being violated by integrating traffic cameras into a crime center. Right now, the Trump administratio n, ICE, and "red" states with anti-abortion and anti-gender affirming care laws are using any data that they can get from other databases to attack people. Traffic cameras are about traffic laws, not other types of law enforcement.</p> <p>I am tired of being filmed everywhere. There are no rules about data storage. No one takes privacy or safety seriously.</p> <p>How long will these videos be stored?<br/>Where will</p> | <p>Traffic cameras make our streets safer by getting people to follow traffic laws. That's it.</p> | <p>If Seattle truly is a safe city for immigrants, trans people, people seeking abortions, etc., then we need to live by those values. This data will be abused. It will not be stored safely, and bad actors will get into it.</p> <p>This also expands SPD's budget. SPD has the LARGEST budget in the City. This means that we, as a city, value SPD over anything else, and we don't have other services because our elected officials have said that SPD is the most important department. We have a budget shortfall because of SPD's out-of-control</p> |

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                |  |                          |                                                                                                                                                                                                                                                                              |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| they be<br>stored? Who<br>will have<br>access?<br>There are no<br>governance<br>thoughts put<br>around this.                                                                                                                                                   |  |                          | spending and<br>coming in<br>over budget<br>every single<br>year. It is<br>fiscally<br>irresponsible<br>to keep<br>expanding<br>their budget.                                                                                                                                |  |  |
| That more<br>surveillance<br>will lead to<br>the further<br>over policing<br>of<br>communities<br>that have<br>already<br>suffered from<br>over policing.<br>That these<br>recordings<br>will be shared<br>with ICE and<br>other federal<br>law<br>enforcement |  |                          | This is a time<br>where we<br>should be<br>coming<br>together as a<br>city. By<br>installing this<br>technology<br>you are<br>breaching a<br>level of trust<br>with your<br>constituents.<br>This will not<br>be forgotten.<br>Please please<br>do the right<br>thing and do |  |  |
| 1                                                                                                                                                                                                                                                              |  |                          | No I do not. It                                                                                                                                                                                                                                                              |  |  |
| 4                                                                                                                                                                                                                                                              |  |                          | is a slippery                                                                                                                                                                                                                                                                |  |  |
| 2                                                                                                                                                                                                                                                              |  |                          | slope to go                                                                                                                                                                                                                                                                  |  |  |
|                                                                                                                                                                                                                                                                |  |                          | down with                                                                                                                                                                                                                                                                    |  |  |
|                                                                                                                                                                                                                                                                |  |                          | this.                                                                                                                                                                                                                                                                        |  |  |
|                                                                                                                                                                                                                                                                |  | Please don't<br>do this. |                                                                                                                                                                                                                                                                              |  |  |

Appendix B: Public Comment Period (6/03/25 to 6/23/25)

that seek to  
target our  
city. And that  
it will lead to  
mistrust of  
the citizens of  
this city of  
their police  
force in a  
critical time  
where our  
relationship  
needs to be  
mended. This  
is not the way  
to mend that  
relationship.

institute this  
technology.  
This will not  
make our city  
safer and just  
adds to  
potential  
animosity  
between  
Seattle law  
enforcement  
and the  
populace.

SPD should  
not have  
access to  
traffic  
cameras. This  
will erode our  
civil liberties  
even further  
by making it  
even easier  
for police and  
ICE to target  
black and  
brown  
communities,  
immigrants,  
1 and anyone  
4 they don't  
3 like.

None,  
whatsoever.

Please focus  
your  
resources on  
building more  
housing,  
mental health  
resources,  
education,  
and reducing  
poverty.  
Police  
surveillance  
will not make  
us safer, nor  
will it solve  
the root  
causes of  
inequality  
and suffering,  
which make  
us unsafe.

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                        |                                                                                                                                                                                                                             |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | RTCC software such as Fusus poses a threat to our civil liberties, especially our first amendment right of free speech, public protest, and public assembly. RTCC also harms by aiding in criminalizing people seeking abortions and gender-affirming healthcare. RTCC is a threat to women and survivors of sexual assault and stalking. RTCC harms immigrants by giving information directly to ICE, directly supporting the kidnapping of immigrants with no due process. Police control of RTCC cameras leads to censorship and selective | SPD already has a real time crime center. SPD's existing RTCC (iBase) is on-premise, so it doesn't create the risk of data being obtained from third parties or legal requests from those outside Washington state. There is no reason for SPD to obtain a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents. | I do not see any value in this technology. Real safety comes from community care, equitable access to resources, stable housing, food security, childcare, education, and jobs that pay a living wage. | I want City leadership to deeply examine the questions, "What is safety? Do I want safety for everyone?"                                                                                                                    |
| 1 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                        | I want City leadership truly listen to the voices of marginalized people and those standing up for them in the community and let those voices be a guide for what safety could look like instead of increased surveillance. |
| 4 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                        |                                                                                                                                                                                                                             |
| 4 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                        |                                                                                                                                                                                                                             |

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

punishment.  
RTCC creates  
a system ripe  
for abuse and  
potential to  
violate all of  
our First and  
Fourth  
Amendment  
Rights. Do not  
expand and  
allow SPD to  
purchase  
another RTCC  
software to  
harm our  
neighbors.

|                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RTCC<br>software<br>makes it<br>impossible to<br>keep<br>surveillance<br>data from<br>ICE. Local<br>police<br>departments<br>are very cozy<br>with ICE and<br>RTCC makes<br>it easier for<br>them to<br>casually<br>share<br>surveillance | ICE has a<br>history of<br>terrorizing<br>immigrant<br>communities.<br>Jurisdictions<br>that do not<br>use local<br>resources to<br>enforce<br>federal<br>immigration<br>laws have<br>lower rates of<br>crime,<br>poverty, and<br>unemployment<br>than those | None.<br>Nashville<br>abandoned<br>its pursuit on<br>FUSUS (the<br>RTCC SPD<br>uses) in April<br>2025 because<br>it didn't<br>believe any<br>guardrails<br>would keep<br>the Trump<br>Administration<br>& ICE from<br>accessing it. |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Appendix B: Public Comment Period (6/03/25 to 6/23/25)

|                                                                                                                                                                                                                                                                   |                                                                                                                                                                                     |                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| <p>data. And, RTCC means ICE is able to search nationwide databases of surveillance data including data from police departments in Washington State, other states with “sanctuary” laws, and non-police entities including the King County Housing Authority.</p> | <p>that chose to collaborate. It was with this knowledge that the Keep Washington Working Act was passed to prevent data sharing between immigration and local law enforcement.</p> |                                                                              |
| <p>I’m against SPD obtaining a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents.</p>                                                                                                                       | <p>Less surveillance, not more.</p>                                                                                                                                                 | <p>This a dangerous direction and a slippery slope eroding our freedom.</p>  |
| <p>This technology will not decrease crime and is ripe for abuse.</p>                                                                                                                                                                                             | <p>None</p>                                                                                                                                                                         | <p>Investing in communities is the most effective way to decrease crime.</p> |

## 2025 Surveillance Impact Report Executive Overview

# Real-Time Crime Center

Seattle Police Department

## Overview

This Executive Overview documents information about the collection, use, sharing, security, and access controls for data that is gathered through Seattle Police Department's (SPD) Real-Time Crime Center (RTCC). All information provided here is contained in the body of the full Surveillance Impact Review (SIR) document but is provided in a condensed format for easier access and consideration.

## 1.0 Technology Description

Real-Time Crime Center (RTCC) software provides a centralized location for real-time information and analysis. At its core, RTCC software integrates dispatch, cameras (such as CCTV and traffic monitoring cameras), officer location, 911 calls, records management systems, and other information into one “pane of glass” (a single view). The software is used to alert RTCC staff to a serious criminal event, see multiple streams of information overlaid on a map view, and convey information to officers responding in the field.

## 2.0 Purpose

The purpose of RTCC software is to provide situational awareness to increase officer and citizen safety, and reactively investigate incidents. Having real-time, accurate information in one place helps increase reliability regarding the location of victims and suspects – enabling quicker aide and safer apprehension. Having better visual and spatial suspect information will help reduce unnecessary stops by officers, focusing their efforts on verified locations and accurate descriptions.

## 3.0 Data Collection and Use

The RTCC software integrates data from other SPD systems into a centralized location for real-time information and analysis. Data feeding into RTCC could come from dispatch, CCTVs, SDOT traffic monitoring cameras, officer location, 911 calls, records management systems (RMS), ALPR, geographic information systems (GIS), and other information systems. Information from some of these systems may be stored in storage related to the RTCC software to provide a comprehensive record of an incident. Storage of information not used for investigations or law-enforcement uses would be for 30 days maximum.

SDOT traffic monitoring cameras (as referenced in the “Closed Circuit Television ‘Traffic Cameras’ (Transportation)” SIR) will be utilized in the RTCC software for law enforcement purposes.

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense (GO) Report. Evidence is submitted to the Evidence Unit and associated with a specific GO Number and investigation.

## 4.0 Data Minimization & Retention

The RTCC software is used to integrate data from various sources used by SPD into one place, a single view. All data sources have their own pre-existing controls in place to minimize inadvertent or improper collection, as outlined in previous surveillance impact reports for the relevant technology.

The RTCC software itself will store some of the data from the integrated systems to provide a comprehensive picture of an incident. Data that is not part of a criminal investigation will be subject to a 30-day retention

policy, after which it will be purged from the system.

## 5.0 Access & Security

### Access

Only authorized SPD, OPA, and OIG users can access the RTCC software platform. Access to the systems/technology is limited to authorized personnel via password-protected login credentials.

Data extracted from the system/technology and entered into investigative files is securely inputted and used on SPD's password-protected network with access limited to authorized detectives and identified supervisory personnel.

All SPD employees are backgrounded and access is controlled by SPD Manual Title 12 provisions governing Department Information Systems including [SPD Policy 12.040](#) - Department-Owned Computers, Devices & Software, [SPD Policy 12.050](#) - Criminal Justice Information Systems, [SPD Policy 12.080](#) – Department Records Access, Inspection & Dissemination, [SPD Policy 12.110](#) – Use of Department E-mail & Internet Systems, and [SPD Policy 12.111](#) – Use of Cloud Storage Services.

All use of the RTCC will be for legitimate law enforcement purposes only. Personal or inappropriate use or dissemination of information can result in internal discipline, termination, and penalties under federal or state law.

### Security

Any incident or multimedia data extracted from the system will be stored in a method compliant with the FBI's CJIS requirements. The specific details are vendor dependent, but could include either cloud storage or on-premise storage. The storage configuration may vary from vendor to vendor, but SPD expects similar industry standards when it comes to cloud storage and access controls.

Retention period for data stored in RTCC software storage will be 30 days, data will be overwritten after that retention period expires. Data associated with criminal investigations will get saved as evidence in SPD's digital evidence locker consistent with retention guidelines for evidence.

Audits from the OIG or other official auditors will be allowed as needed.

## 6.0 Data Sharing and Accuracy

Data obtained from the technology may be shared outside SPD with the other agencies, entities, or individuals within legal guidelines or as required by law. Data may be shared with outside entities in connection with criminal prosecutions.

Data may be made available to requesters pursuant to the Washington Public Records Act, [Chapter 42.56 RCW](#) ("PRA"). SPD will apply applicable exemptions to the data before disclosing to a requester. Individuals have the right to inspect criminal history record information maintained by the department ([RCW 10.97.030](#), [SPD Policy 12.050](#)). Individuals can access their own information by submitting a public disclosure request.

Per [SPD Policy 12.080](#), the Crime Records Unit is responsible for receiving, recording, and responding to requests "for General Offense Reports from other City departments and from other law enforcement agencies,

as well as from insurance companies.”

Discrete pieces of data collected by the RTCC software may be shared with other law enforcement agencies in wanted bulletins, and in connection with law enforcement investigations jointly conducted with those agencies, or in response to requests from law enforcement agencies investigating criminal activity as governed by [SPD Policy 12.050](#) and [12.110](#). All requests for data from Federal Immigration and Customs Enforcement (ICE) authorities are referred to the Mayor’s Office Legal Counsel in accordance with the Mayoral Directive, dated February 6, 2018.

SPD shares data with authorized researchers pursuant to properly execute research and confidentiality agreements as provided by [SPD Policy 12.055](#). This sharing may include discrete pieces of data related to specific investigative files collected by the devices.

## 7.0 Equity Concerns

The mission of the Seattle Police Department is to prevent crime, enforce the law, and support quality public safety by delivering respectful, professional, and dependable police services. SPD Policy 5.140 forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior and other accountability measures. This pilot will be data-informed and guided. It will terminate if data suggests the technology is ineffective. Utilizing the abilities of the Performance Analytics and Research Unit, the Seattle Police Department has a plan to actively manage performance measures reflecting the “total cost of ownership of public safety,” Equity, Accountability, and Quality (“EAQ”), which includes measures of disparate impact and over policing. In addition to a robust *Continuous Intervention Assessment* designed to inform, in real-time, the active development of a safer and more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures *just right* policing is achieved with undue collateral harm.

It’s worth noting that many factors can contribute to disparate impacts in policing, most of which occur early in a person’s life, long before there is engagement with the police. For example, systems and policies that perpetuate poverty, the failure to provide children with the strong and fair start they deserve in the crucial birth-to-five years, inadequate public education, and a lack of economic opportunity can all contribute to disparate outcomes. In addition, family dynamics and peer pressure can also create negative outcomes. We recognize these factors and strive to do our part to mitigate them, but we can’t expect our police officers by themselves to cure these contributory factors. However, we do expect our officers to do their jobs respectfully and fairly as they interact with community members.

These technologies are location-specific, with a place-based focus, meaning they will record people who choose to be in a public place where the technologies are being used. This mitigating factor reduces, to an extent, the possible disparate impact of potential police actions.

## **SUMMARY and FISCAL NOTE**

| <b>Department:</b>        | <b>Dept. Contact:</b> | <b>CBO Contact:</b> |
|---------------------------|-----------------------|---------------------|
| Seattle Police Department | Nick Zajchowski       | Geoffrey Detweiler  |

### **1. BILL SUMMARY**

**Legislation Title:**

AN ORDINANCE relating to surveillance technology implementation; authorizing approval of uses and accepting the 2025 updated surveillance impact report and 2025 executive overview for the Seattle Police Department's use of Real-Time Crime Center software.

**Summary and Background of the Legislation:** The original Surveillance Impact Report (SIR) for Real-Time Crime Center software (Ordinance 127111) was adopted by the City Council on October 8, 2024. Subsection 14.18.020.F of the Seattle Municipal Code (SMC) states that "[a]ny material update to an SIR, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance."

The material update will provide the Seattle Police Department (SPD) the ability to view the Seattle Department of Transportation (SDOT) traffic monitoring cameras in the RTCC software.

### **2. CAPITAL IMPROVEMENT PROGRAM**

**Does this legislation create, fund, or amend a CIP Project?** ☐ Yes ☒ No

### **3. SUMMARY OF FINANCIAL IMPLICATIONS**

**Does this legislation have financial impacts to the City?** ☐ Yes ☒ No

#### **3.d. Other Impacts**

**Does the legislation have other financial impacts to The City of Seattle, including direct or indirect, one-time or ongoing costs, that are not included in Sections 3.a through 3.c? If so, please describe these financial impacts.**

SPD's current budget includes \$2.0 million included in the 2025 budget and \$3.7 million in 2026 to fully staff the RTCC by the end of 2026. The annual licensing costs for RTCC are \$330,000. The use of RTCC software, when strategically integrated with the CCTV Crime Prevention Technology Pilot, may help mitigate SPD's shortage of sworn staffing by more effectively deploying patrol resources to incidents and follow-up investigations. However, use of the RTCC software and the other related technologies being assessed does not necessarily correlate to direct cost savings.

**If the legislation has costs, but they can be absorbed within existing operations, please describe how those costs can be absorbed. The description should clearly describe if the absorbed costs are achievable because the department had excess resources within their existing budget or if by absorbing these costs the department is deprioritizing other work that would have used these resources.**

N/A

**Please describe any financial costs or other impacts of *not* implementing the legislation.**

There are expected to be impacts in the form of efficiencies in deploying patrol officers and assisting with investigations. These impacts will be explored as part of the planned evaluation of the pilot.

**Please describe how this legislation may affect any City departments other than the originating department.**

The material update will provide the Seattle Police Department (SPD) the ability to view the Seattle Department of Transportation (SDOT) traffic monitoring cameras in the RTCC software.

#### 4. OTHER IMPLICATIONS

**a. Is a public hearing required for this legislation?**

No.

**b. Is publication of notice with The Daily Journal of Commerce and/or The Seattle Times required for this legislation?**

No.

**c. Does this legislation affect a piece of property?**

No.

**d. Please describe any perceived implication for the principles of the Race and Social Justice Initiative.**

**i. How does this legislation impact vulnerable or historically disadvantaged communities? How did you arrive at this conclusion? In your response please consider impacts within City government (employees, internal programs) as well as in the broader community.**

The original 2024 Surveillance Impact Report as required by the Surveillance Ordinance includes a Racial Equity Toolkit.

**ii. Please attach any Racial Equity Toolkits or other racial equity analyses in the development and/or assessment of the legislation.**

N/A

**iii. What is the Language Access Plan for any communications to the public?**

The SIR documents were translated into the recommend languages and were posted online.

**e. Climate Change Implications**

**i. Emissions: How is this legislation likely to increase or decrease carbon emissions in a material way? Please attach any studies or other materials that were used to inform this response.**

No.

**ii. Resiliency: Will the action(s) proposed by this legislation increase or decrease Seattle's resiliency (or ability to adapt) to climate change in a material way? If so, explain. If it is likely to decrease resiliency in a material way, describe what will or could be done to mitigate the effects.**

No.

**f. If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s)? What mechanisms will be used to measure progress towards meeting those goals?**

The pilot will be evaluated under a Continuous Impact Assessment framework. Outside academic subject matter experts will be retained to design and manage an evaluation plan with an assessment at the end of one year and another at the end of year two.

**g. Does this legislation create a non-utility CIP project that involves a shared financial commitment with a non-City partner agency or organization?**

No.

**5. ATTACHMENTS**

**Summary Attachments:** None.

July 29, 2025

## MEMORANDUM

**To:** Public Safety Committee  
**From:** Greg Doss, Analyst  
**Subject:** Expanding the use of Seattle Police Department (SPD) Closed-Circuit Television cameras (CCTV) and adding new capabilities to the SPD Real-Time Crime Center (RTCC)

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On July 31, 2025, the Public Safety Committee will discuss two executive drafted ordinances that would expand SPD's use of existing surveillance technologies:

- TMP-11624 would authorize SPD to install and use CCTV cameras in three new/additional locations at Capitol Hill, the Stadium District, and areas near Garfield High (see Attachment 1); and
- TMP-11625 would authorize SPD to access and continuously record Seattle Department of Transportation (SDOT) traffic management camera footage at the RTCC (see Attachment 2).

SPD and Executive staff will give a presentation on the planned expansion of these systems, which the City Council authorized last year as a pilot project, and which are subject to an evaluation that will provide phased results in 2026 and 2027.

Though presented in separate pieces of legislation, the underlying technologies and policy considerations will be discussed together in this memo due to the integrated nature of the technologies as elements of the Executive's [Technology Assisted Crime Prevention Pilot Project](#) (TACPP).

### Background

The City's Surveillance Ordinance ([ORD 125376](#)), requires that the City Council approve by ordinance any material updates to the data and privacy protection policies that govern the CCTV and RTCC systems. These policies are outlined in documents called Surveillance Impact Reports (SIRs), which were reviewed and approved by the Council in October 2024:

- [ORD 127110](#) approved use of CCTV, and the associated SIR policies, for three pilot areas: (1) Aurora Ave N 85th to 145th, (2) Downtown Core and Belltown, and (3) Chinatown / International District; and
- [ORD 127111](#) approved use of the RTCC, and the associated SIR policies, to integrate dispatch, camera, officer location, 911 calls, records management systems, and other information into a "single view" to alert RTCC staff to a serious criminal event, see multiple streams of information overlaid on a map view, and convey information to officers responding in the field.

A 2024 Central Staff Memo (see Attachment 3) describes in detail the CCTV and RTCC systems, their intended use by SPD, as well as the data protection and privacy policies outlined in the SIRs for these systems.<sup>1</sup> The memo provides an in-depth analysis of potential civil liberties impacts, potential disparate impacts on historically targeted communities and vulnerable populations, and the public engagement process used to solicit feedback on the technologies.

When reviewing the proposed ordinances in 2024, the Council passed several amendments that placed additional restrictions on the technologies. Following is a summary of the amendments:

- A requirement that SPD provide at the end of 2025 and at the end of 2026 a report on the evaluation assessments that will be conducted as detailed in the SIRs,
- A requirement to include in the evaluation of the TACPP a study reporting on the appropriateness, feasibility, and cost of additional potential future CCTV deployments, to include an examination of the Alki and Harbor Avenue areas of West Seattle,
- A requirement that SPD provide to the Public Safety Committee notification that the department will integrate private camera footage into its RTCC, and identification of policies that would govern the use of such systems,
- A requirement that SPD report to the Public Safety Committee, by December 31 of each year, beginning in 2025, information about any subpoenas, warrants, and public disclosure requests for CCTV data,
- A requirement that SPD not disclose CCTV data in response to a records request made under the Public Records Act (chapter 42.56 RCW), or otherwise publicly disclose CCTV data, in a manner inconsistent with SPD protocols governing redactions, including protections for victims of crime, minors, and health care facilities, and
- A request that SPD include in any contract with a vendor for RTCC and CCTV: (1) a requirement that the vendor immediately notify SPD if the vendor receives a warrant or subpoena seeking SPD RTCC data for any purpose, including purposes related to reproductive healthcare or gender-affirming medical services; and (2) a requirement that the vendor retain legal counsel to challenge any such warrant or subpoena and advise of outcome or existence of warrant after expiration.

### **TMP-11624 and TMP-11625**

**TMP-11624** would approve and accept the material updates to the CCTV SIR and Executive Overview. The initial CCTV pilot deployment areas are Aurora Avenue North, Belltown and the Downtown Commercial Core, and the Chinatown-International District. The material update adds the Stadium District, the area around Garfield High School, and the Capitol Hill Nightlife District to the list of eligible CCTV deployment areas. It clarifies that CCTV video recordings are automatically purged by the system up to 30 days after the date of recording, or until determined that all evidence material to an incident under investigation has been transferred to secure storage.

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<sup>1</sup> See [2024 RTCC Surveillance Impact Report](#) and [2024 CCTV Surveillance Impact Report](#)

**TMP-11625** would approve and accept the material updates to the RTCC SIR and Executive Overview. The material update will provide SPD with the ability to view at the RTCC live feed from SDOT traffic management cameras.<sup>2</sup> When utilized with the RTCC software, the feed from the SDOT cameras will allow SPD to track vehicles and subjects who are suspected of being involved in criminal activity. The SDOT cameras will be recorded in the same manner as the department's TACPP crime cameras.

The data retention and privacy policies in the updated SIRs have not changed since their adoption by the Council in 2024. The revised SIRs add the new CCTV locations, traffic management camera functionality, and better synch the 30-day retention policy with the state retention policy by adding language that requires deletion of video "up to" 30 days or discovery of video with evidentiary value.

### **Status of Approved Pilot Project**

SPD's Budget includes funding for 12 RTCC Analysts in 2025 and nine additional Analysts in 2026. SPD reports that it has hired 12 analysts, eight of whom are currently staffing the RTCC for up to 20 hours per day, and four of whom are still being backgrounded before they may begin work. Analysts are supporting ongoing investigations by pushing video and incident data directly to patrol units and detectives. Analysts can also provide live updates and still images of suspects, a capability SPD says helps support its "precision policing" model.<sup>3</sup> Since the RTCC went live last May, Analysts have assisted patrol officers during real-time events and assisted investigations for active cases. SPD reports that officers have made over 75 arrests in incidents where the RTCC was used.

SPD's 2025 Adopted Budget includes funding for deployment of CCTV in the initial pilot areas (see below), as well as an expansion of cameras on the Aurora Corridor and into the areas surrounding Garfield High School. More information on the costs of all of the proposed sites can be found below.

SPD staff have reported that it will deploy into the initial pilot areas a total of 65 cameras and that all but 16 are currently active. SPD reports that the cameras are already providing the RTCC with significant coverage and allowing analysts to support investigative work and patrol calls for service. Camera status by initial pilot area as of July 6, 2025:

1. Chinatown / International District: 16 out of 20 cameras installed
2. Aurora Ave. N: 10 out of 16
3. Downtown Core: 25 out of 29

More information about current CCTV locations and policy can be found at the [City's CCTV website](#).

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<sup>2</sup> SDOT traffic management cameras are located along major arterials and select intersections. These cameras are different from City-operated traffic enforcement cameras, such as red-light cameras and school zone speed cameras.

<sup>3</sup> [GeekWire](#), 'It's a game-changer': Seattle touts high-tech Real Time Crime Center amid privacy concerns, July 15, 2025

## **Evaluation of Pilot Project**

The abstract sections of each SIR indicate that the CCTV and RTCC programs are designed to be a pilot project, with independent researchers conducting an outcome evaluation to be completed two years after implementation. Depending on the outcome of the evaluation, the pilot project may be either discontinued or continued.

To fulfill the evaluation requirements specified in the SIRs, the City's Office of Inspector General for Public Safety (OIG) is in the process of hiring independent academic experts to evaluate the RTCC and the Police Department's use of the RTCC, CCTV cameras, and Automated License Plate Readers. The evaluation team will be led by Principal Investigator Anthony Braga and Co-Principal Investigator Lisa Barao at the University of Pennsylvania's (UPenn) Crime and Justice Policy Lab.

OIG staff have indicated that SPD and UPenn researchers are developing a data collection tool and outlining the terms of the evaluation, which are expected to be included in a \$300,000 contract that will be signed in the upcoming weeks. The department expects that it will be able to provide a process report on the method being used to assess CCTV and RTCC effectiveness, as well as a potential delivery date for the outcome evaluation, to the Council in late 2025.

## **System Expansion**

The Executive has stated that the Garfield HS and Capitol Hill areas will receive cameras to address pressing public safety needs, including emergent gun violence occurring in the nightlife district and around Garfield High School. Cameras will be deployed in the City's Stadium District to provide security to residents and visitors who will attend the FIFA World Cup games in the spring of 2026.

The Mayor has said that Seattle needs every appropriate tool that's available to reduce gun violence and other felony crimes, address human trafficking, and respond to areas where crime is concentrated. The Executive does not believe that the forthcoming evaluation should be a barrier to effectively using approved technology to meet the program's goals, including the use of additional cameras.

Regarding the addition of SDOT traffic camera feed to the RTCC, the Executive notes that the city is seeking a live-view functionality that is already accessible to the public, and that private entities are currently recording SDOT streams and selling them publicly online. SPD could also view and record the camera feed, but the surveillance ordinance requires approval from the Council before doing so.

## **Public Review of Proposed Material Updates**

The City's Surveillance Ordinance requires that the initial draft of a SIR for a new technology be released for public review and comment. During this time, one or more public meetings will take place to solicit feedback. Additionally, the SIR for a new technology is reviewed by the Surveillance Advisory Working Group, which will complete a Civil Liberties and Privacy Assessment that is submitted to Council. The original SIRs for CCTV and RTCC underwent this process last year. More information can be found in the 2024 Central Staff Memo.

The Surveillance Ordinance does not require the same kind of review for material updates to adopted SIRs. The updated SIR documents attached to TMP-11624 and TMP-11625 were made available for public comment on the Seattle IT Surveillance website from June 3, 2025, to June 23, 2025. The comments can be found in Appendix B of the SIR documents in Attachments 1 and 2 to this memo. The Redlined copies of the material updates can be found at [Seattle IT's Surveillance Website](#).

The Executive has indicated that its public engagement efforts included conversations between the Garfield-Nova neighborhood and the Seattle Public Schools, discussions between SPD, the stadiums, and area businesses, and a briefing given at recent SODO and Pioneer Square Businesses Improvement District meetings. Camera installations for the Capitol Hill nightlife area were discussed at a community forum and through individual meetings with business leaders.

### **Fiscal Impacts**

Last year, SPD received an appropriation of \$1.7 million for the TACPP, which covered initial equipment purchases and installation of Automated License Plate Readers (ALPR) in all SPD vehicles, CCTV in the initial three pilot neighborhoods, and software to run the systems at the RTCC. Most of this funding has been spent in 2025 and will be covered through a reappropriation of funding through the City's 2024-2025 Carry-Forward Ordinance, which will receive its first hearing in the Finance, Native Communities & Tribal Governments Committee on July 30, 2025.

Annual maintenance and licensing costs are \$40,000 for the three initial CCTV pilot locations and \$330,000 for the RTCC, all of which are currently funded in SPD's 2025 Adopted Budget. The Council added to the 2025 Adopted budget \$425,000 in funding to cover the potential expansion of CCTV to the Garfield High School neighborhood, and \$200,000 for additional cameras at the Aurora Ave. pilot site.

The Executive plans to request \$200,000 in funding for the Stadium District CCTV cameras soon after the Council passes TMP-11624. The City allocated in the 2025-2026 Adopted Budget unrestricted cumulative reserve and Payroll Expense Tax funding to support the cameras and other infrastructure expenditures for the 2026 FIFA World Cup games. This funding will be directed to SPD in a stand-alone ordinance or as part of the 2025 Year-end Supplemental Budget Request.

The City Budget Office indicates that installation of CCTV cameras in the Capitol Hill area is expected to cost approximately \$400,000 in one-time funding and \$35,000 for annual maintenance and licensing. A funding source for these cameras has not been identified but would likely need to be a general fund appropriation in the 2026 Adopted Budget.

**Next Steps**

The Public Safety Committee will hold a second hearing and possible vote on both TMP-11624 and TMP-11625 on August 12, 2025.

**Attachments:**

1. TMP-11624 – SPD Closed-Circuit Television Camera Systems Material Update ORD (as transmitted)
2. TMP-11625 – SPD Real-Time Crime Center Material Update ORD (as transmitted)
3. 2024 Central Staff Memo on CCTV and RTCC

cc: Ben Noble, Director

## Amendment 1 to CB 121053 Material Update to RTCC Policies

**Sponsor:** Councilmember Kettle

**Author:** Councilmember Rinck

### Strengthen Evaluation Requirements

**Effect:** This amendment would require the Office of the Inspector General for Public Safety (OIG) to include in any contract with a vendor for the evaluation of the Real Time Crime Center (RTCC) and Closed-Circuit Television (CCTV) pilot projects a methodology that determines if CCTV, when used in combination with the RTCC, deters violent crime, human trafficking or persistent felony crime.

If the evaluation does not show that CCTV deters violent crime, then the Executive would need to consider, in compliance with the Surveillance Impact Report (SIR) policies, discontinuing the pilot project.

### Add a new Section 2 as follows and renumber subsequent sections:

Section 2. The Office of Inspector General for Public Safety shall include, in any contract with a vendor for the evaluation of the Real Time Crime Center (RTCC) and Closed-Circuit Television (CCTV) pilot projects, a methodology that utilizes control group areas and a quasi-experimental design to determine if CCTV, when used in combination with the RTCC, deters violent crime, human trafficking, or persistent felony crime when public notice is posted. If the evaluation does not show that CCTV deters violent crime, then the Executive shall, in compliance with the SIR policies in section 1.1 and 2.2, consider discontinuing the pilot project.