

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”.

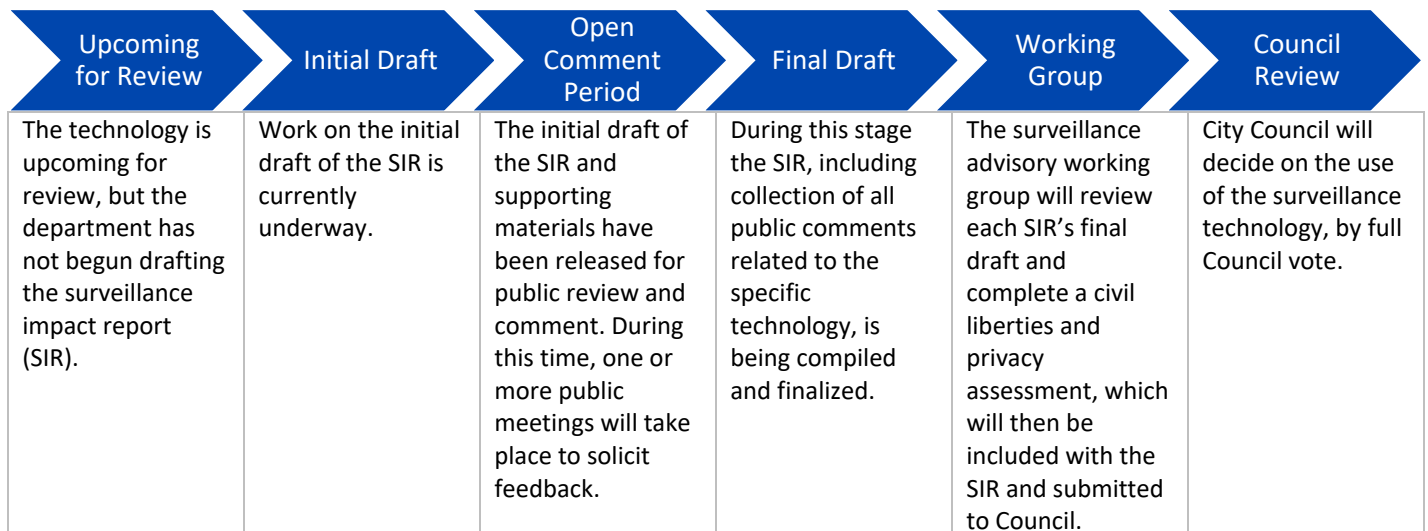
How this Document is Completed

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 125th 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.

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.

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		https://bja.ojp.gov/sites/g/files/xyckuh186/files/media/document/RealTimeCrimeCenterInformation.pdf

Informa tion		
-----------------	--	--

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

☒ **Belltown**

☐ 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

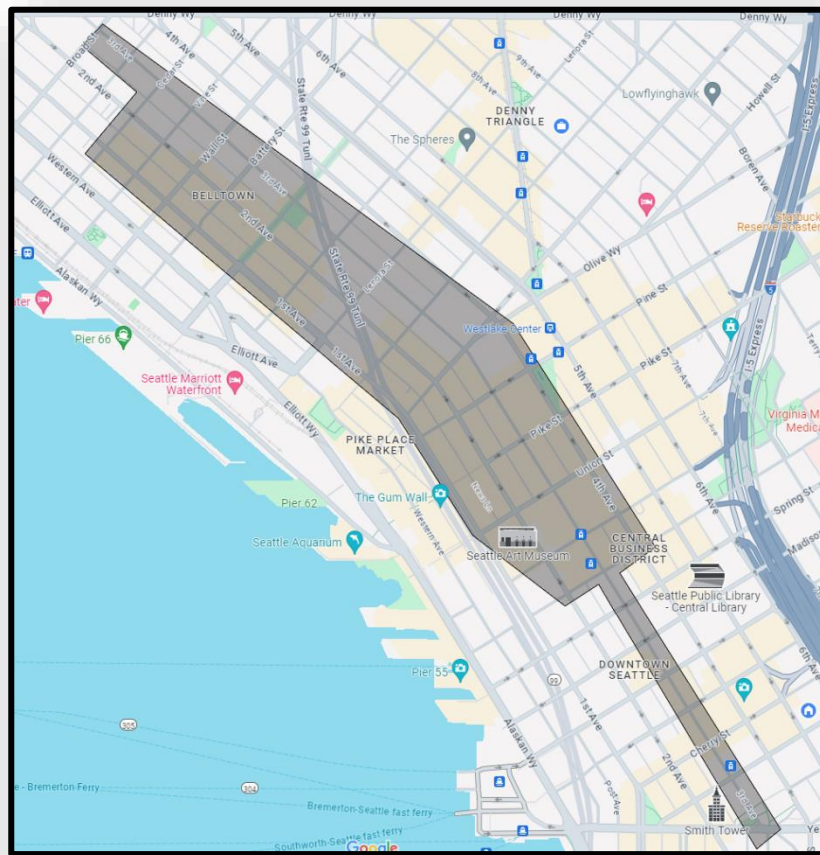
☐ West Seattle

☐ King county (outside Seattle) (Mutual Aid)

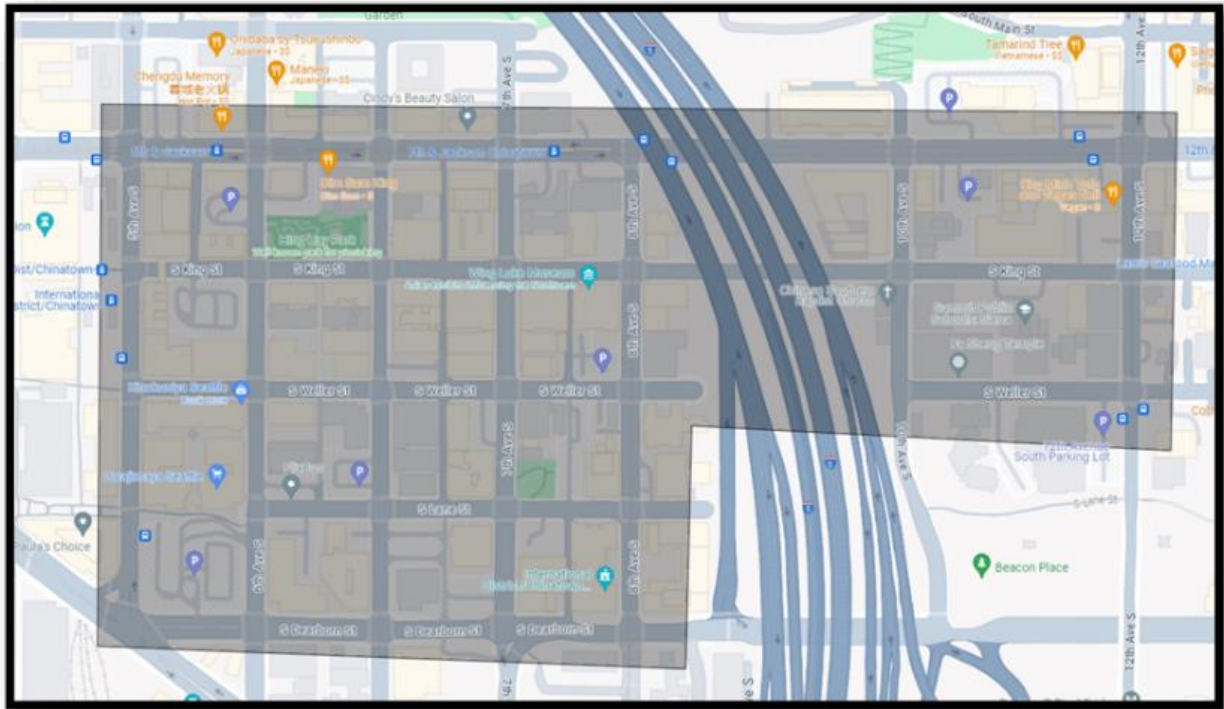
☐ Outside King County (Mutual Aid)

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, 85th to 145th Streets)*



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

Race/Ethnicity	Aurora	Chinatown International District	Belltown	Downtown Commercial	Citywide
American Indian 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 American	8.9%	8.6%	5.5%	11.1%	6.8%
Hispanic or Latino of Any Race	11.3%	7.6%	7.1%	8.3%	8.2%
Native Hawaiian or Pacific 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%
Source: U.S. Census Bureau Decennial Census; OPCD Note: Geographical areas provided are <u>2020 Census Block Assignments of Urban Villages</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 85th to 145th.					

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.

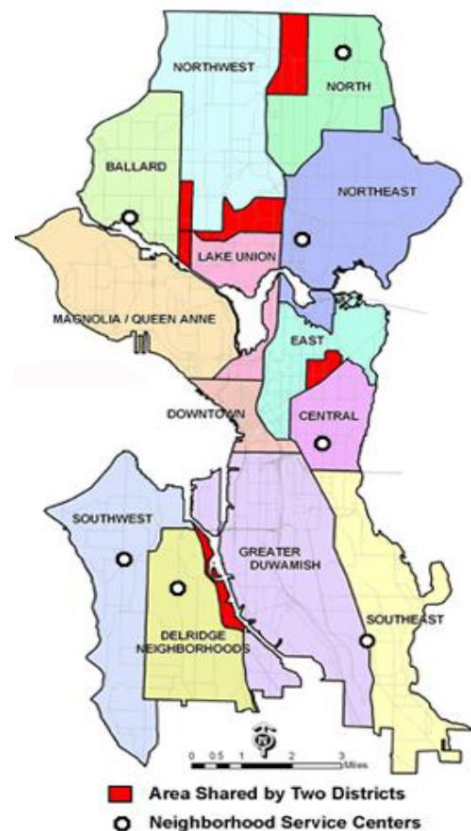
Stakeholders: (taken from the racial equity toolkit.) Those impacted by proposed policy, program, or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ethnic groups, other institutions like Seattle housing authority, schools, community-based organizations,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

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

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

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

- 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

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

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

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

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.

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

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

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

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)

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

- (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.

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>; Privacy <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](#)

From: Brooke Christiansen

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

To: Privacy <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

From: R. John Setzer

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

To: Privacy <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.

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

To: Privacy <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

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

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

From: Jared Howe

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

To: Privacy <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

From: Noel Rivard <nrivard67@gmail.com>

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

To: Privacy <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

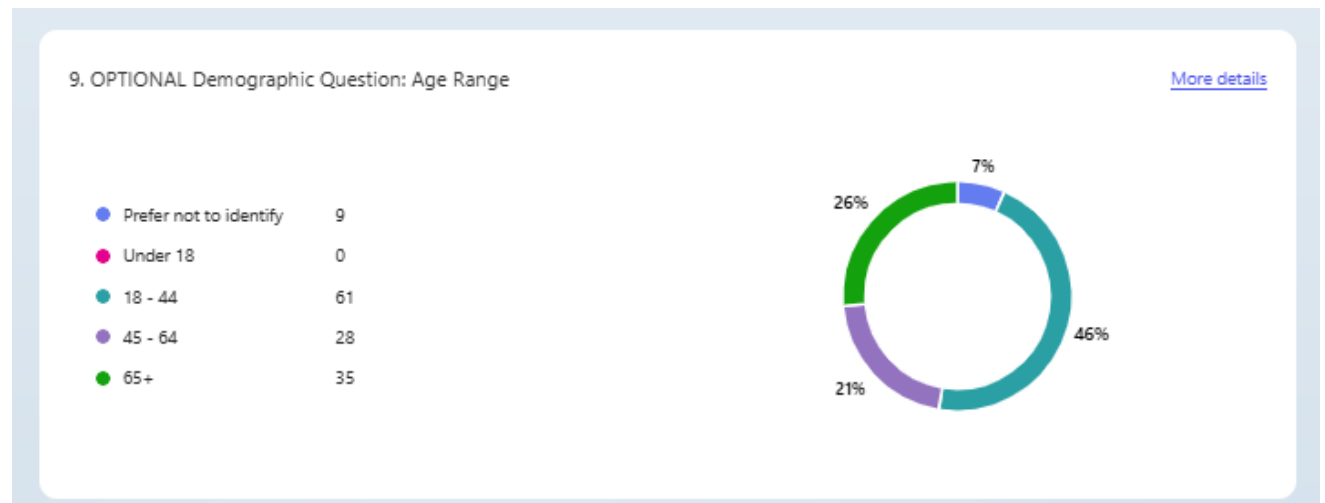
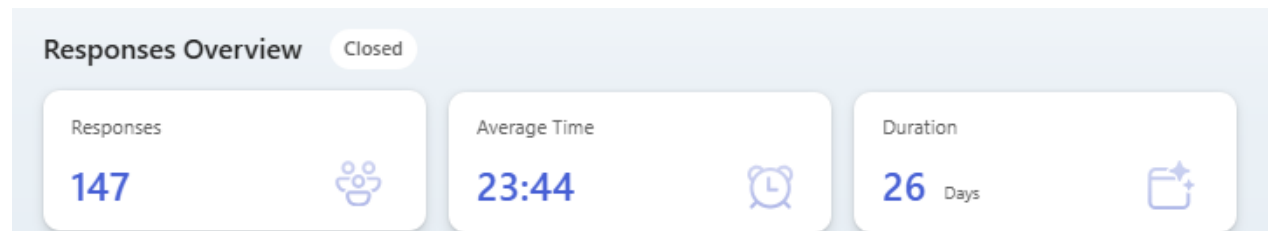
Appendix B: Public Comment Period (6/03/25 to 6/23/25)

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>
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>; LEG_CouncilMembers <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

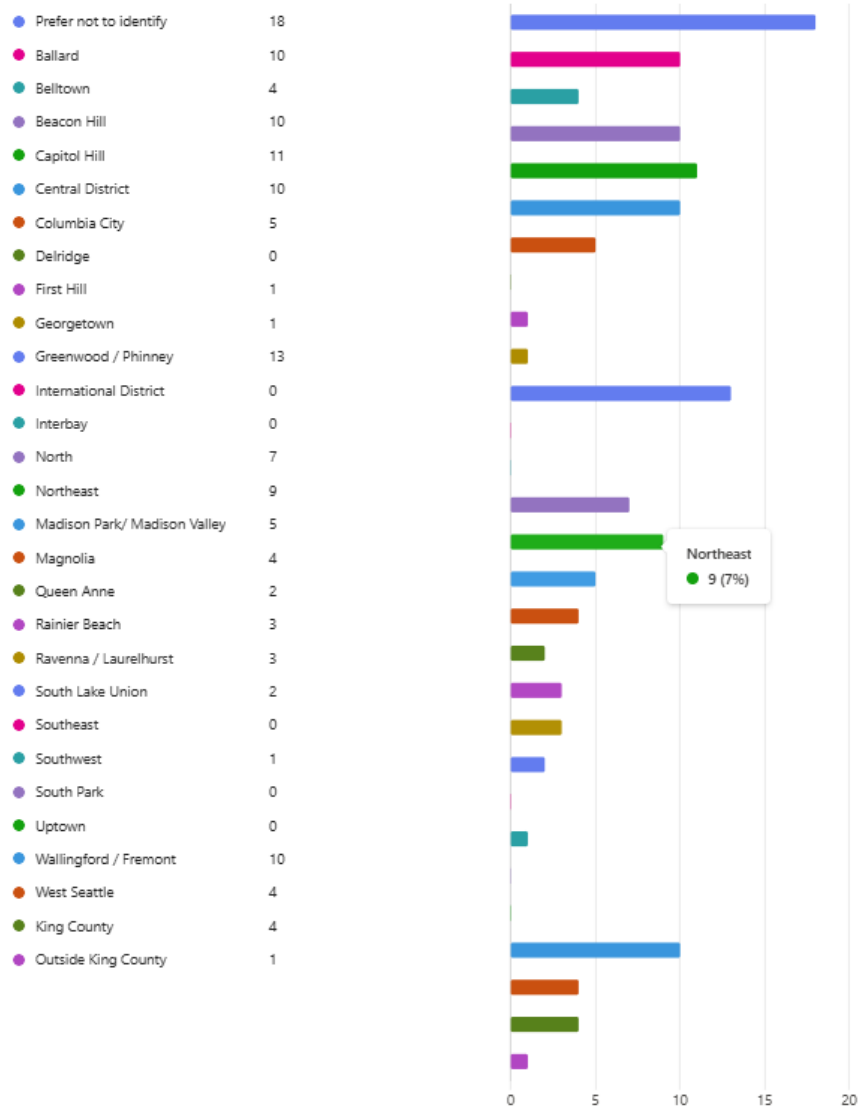
Responses received via form:



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

10. OPTIONAL Demographic Question: Neighborhood

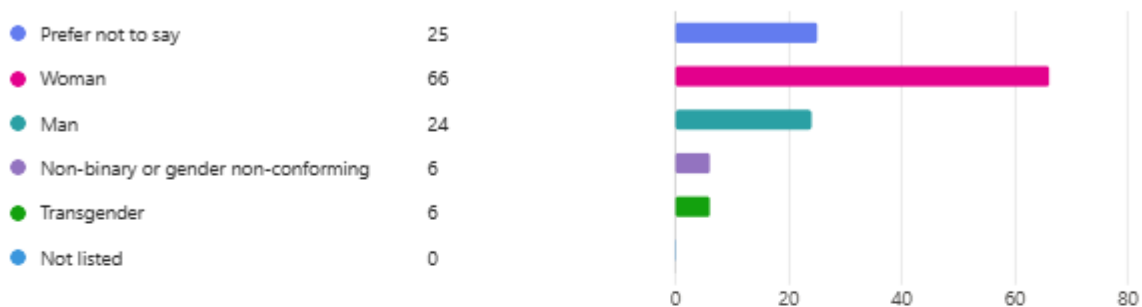
[More details](#)



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

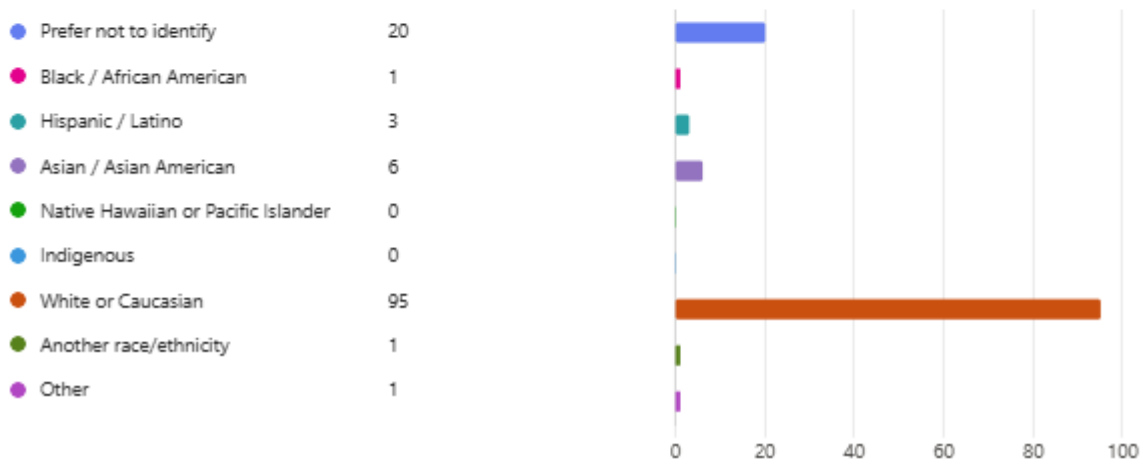
11. OPTIONAL Demographic Question: Gender

[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)	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?
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)

	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)

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.	
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 5 gather?	None	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

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)

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

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

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.
--	--	---	--	--	---

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

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
---	---	---	---	--

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

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.
--	--	---	--

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

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
documentati
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.

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

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
---	---------------------	-------------------	----	--------------------------	--------------------------	----------------------	----------------------

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

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
--	---	--	---	--	---	---

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

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.
--	---	---	---	--	---	---

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

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,
---------------------------	--	--	---

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

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

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

			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?	

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

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)

1 3	This proposal is a risk to Washington's privacy and freedoms to go about their lives, as there is a strong potential that this technology will make it easier for bad actors to misuse civilians' information for unequal policing and political persecution.			
	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 5	RTCC poses a massive risk for everyone. The more data stored in a location the more of a tempting	Absolutely none. This technology is an abuse of power with a universal adapter and should be	The issues on RTCC are very well documented and all came up last year when the Seattle community,	If the city cares about protecting the people of Seattle, it should remove RTCC.

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

target it is. This is both as a target for ICE & other law enforcement agencies to access (which they have) and for hackers to target. RTCC companies have been caught using data obtained from hacks & security breaches in their algorithms. https://www. 404media.co/ license-plate- reader- company- flock-is- building-a- massive- people- lookup-tool- leak-shows/ ICE has access RTCC databases from across the country including Washington State & supposed “sanctuary” states. https://www. 404media.co/ ice-taps-into- nationwide-	removed from Seattle.	Office of Civil Rights, and Community Surveillance Working Group all recommende d against RTCC. 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? Where is the money for this expansion coming from? Relatedly, how is there money for this while the city is doing austerity and cutting services? Why was SPD allowed to submit the original SIR for RTCC without estimating an annual cost only to be allowed to say it needed millions of dollars per
---	--------------------------	---

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)

care about or follow the law or court decisions That's even before considering all of the cases of individual officers abusing RTCC to spy on and blackmail people.				
1 6	It is a breach of privacy for the general public and will put vulnerable communities at risk.	There is no reason for SPD to obtain a cloud-based RTCC It would weaken state laws and endanger women, trans folks, and immigrant residents.	None	It's effect on vulnerable communities.
	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-	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	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—	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

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

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.	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.	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.	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.
This will be used to further surveil and criminalize our most vulnerable neighbors! This is a huge invasion of	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,	That it is a waste of money and a huge violation of residents' privacy.	

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

privacy for
everyone!

this is the
absolute last
thing any
regular
person
needs!

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

None that
would
outweigh its
harms.

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
(<https://docs.google.com/document/d/14EhNiDMb7M8Z7TafyZsbxGOfdelDOGzRYxZNd3biwIE/edit>) for
specific
examples of
the many
effective
tools the city
should use
instead,
which are

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)

crime — such as community-led violence interruption programs — not systems like this which have not.			
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			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.
2 of 0 immigrants.			
I am against the use of this technology.	I am against the expansion.	None	
That SPD will use this to target, harass, and profile marginalized community members		Absolutely no value	SPD has a long history of using their tools and resources against the community to the point of being under federal Stop wasting our resources and tax dollars on SPD and fund what the community actually needs!

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

oversight for many years- they do not need more tools and resources!

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	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.	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.	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.
---	--	---	--

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

	and activists. There's no reason to believe a Real-Time Crime Center would be any different, especially with no independent oversight or accountability.						
2	My concern is that this technology will violate Seattle's right to privacy, and make Seattlites anxious and paranoid about being watched all the time.	N/A	None, it would be a complete waste of our already thin budget.	N/A	Privacy is a RIGHT.	N/A	N/A
2 5	Surveillance is a powerful tool of social repression and state violence against its populace	It's use to support ICE and their enforced dissappearances of peoples.	None. It will only be used to harm people.	We keep us safe, not endless surveillance	The immense harm it will cause to already marginalized and abused portions of our population. NO POLICE STATE		Could we use this to track the City Council members movements?
2 6	I do not want more police surveillance.		None. SPD is big enough and has enough resources.		Expanding other programs to benefit residents material situation.		

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

This is an invasion of privacy and implements strategies utilized by 2 fascist 7 governments.	None	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.
It's frightening, if could be hacked and used against people and it 2 won't reduce 8 crime.	None, we do not need increased surveillance.	How it's going to affect everyone, the cost vs. benefit and how little it's going to make a difference in crime.
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 2 citywide 9 surveillance is a huge injustice to		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

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

	the city. Desired expansion into even more marginalized spaces will not help cops catch bad guys, it will help cops racially profile, brutalize, and discriminate against our own people.			to retroactively bring some sort of justice. Any funds towards this project could easily be used towards other programs that truly keep communities safe such as hard reduction, community centers, and funding for education.	
				FOCUS ON INVESTING IN OUR HEALTH AND EDUCATION, NOT POLICING	
3 0	I oppose the expansion of surveillance	none	expensive and ineffective		
3 1	This technology will make it less safe for marginalized people in Seattle. Transgender and queer people are already targeted by police, as seen in police brutality recently at Cal Anderson Park on May 24. Efforts to criminalize being			Consider the danger of the federal government or military coming to Seattle to take our data and use it for their own means. And consider the people who don't want to have their identity constantly found on a police	Rather than investing in this technology and the constant sweeps on homeless encampment s, we should spend more money giving them affordable housing. South Lake Union and other areas must create affordable housing for

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

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. 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.			security screen.	those who need it.
3 2	ICE and Border patrol are using cloud-based surveillance tools to	There is no evidence whatsoever that RTCC lives up to the vendor	I do not see any value in this technology.	There is no evidence whatsoever that that RTCC has any public

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

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. https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/ Furthermore the Trump administratio n has informed ICE employees that they are at liberty to conduct warrant-less searches https://www.thehandbasket.co/p/ice-warrantless-arrests-castanon-nava Any expansion of this technology is a weapon in the hands of the Trump administratio n and puts our immigrant communities at risk.	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 unconsciona ble.	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.
--	--	--

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

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 3 with ICE, 3 CBP, etc.	None	Why would we want to expand SPD's already enormous surveillance network? Why would we want to do anything that could lead to data sharing with ICE, CBP, etc.?
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 3 better spent 4 on hiring.	None	Consider the privacy rights of the population at large. This is police state stuff!
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 3 increase 5 violence	No value. This is dangerous.	Think of where else the funding for this could go. Preventive care for the people!

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

towards innocent people		
Many. Please 3 do not 6 expand.		Please direct funds towards affordable housing and human services.
This technology is a threat to our first and fourth amendment rights. It will be harmful to women, sexual assault and stalking survivors, and vulnerable marginalized community residents because the third party RTCC software is not protected and can be used negatively on law-abiding community members by out of state individuals or prosecuting agents. It will allow circumnaviga tion of WA state's Shield Law and Keep 3 WA Working 7 Act, which	I see no value in this technology. Studies show that it is actually not effective in reducing violent crime. But there are many cases where it has been used by law enforcement to harass people and divulge private information about people fleeing domestic violence and other state violence which is wrong.	I'd urge them to consider where that money could be spent elsewhere to actually improve the lives of those underserved or most vulnerable. Why not scale the 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

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

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.		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.
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	I see no value in this, and I understand this to be purely a move to further surveil and monitor the residents of Seattle.	How this technology will truly be implemented over safety measures. This technology is easily manipulated and used to profile people.
3 8	None, it will not aid in keeping Seattle safe.	More cameras is not the answer.

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

	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 Washington'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.	

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

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.

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

neighbors of color.						
	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.			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?		
4	Not down.	I do not approve of this level of invasive surveillance in general.	No value that	I approve of.	Don't do it.	Please, don't do it.
2	No, please.		I approve of.			
4	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			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		
3						

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

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.		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.
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	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.	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

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 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 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 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 8	Exposing information to ICE that	None		

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

they should not have		
4 9	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	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.
	None	

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

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

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

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

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

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

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

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

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

Enforcement (ICE) and law enforcement & 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.		
5 0	So many! It makes our city less safe. It takes away our privacy protections.	Outsourcing means we would lose our Seattle/WA privacy laws which we cannot do!
5 1	Having sensitive information essentially	We are in scary times. Your public words of

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

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

			“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	
	Seriously? The GOP/Trump administration has ICE and Homeland Security officers acting like the Secret Police, and Seattle City Council proposes to make surveillance data available to those		Whether the City leadership really wants to make violations of Constitutional rights even easier--and whether the majority of the city's electorate supports this use of our tax dollars (especially given the city's budget woes).
5 2	entities (and others)?	None whatsoever.	

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

laws and
endanger
women, trans
folks, and
immigrant
residents.

5 3	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.	none	The need to protect our vulnerable citizens from additional, unnecessary surveillance.	
5 4	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	I wouldn't want this available to law enforcement even in a climate that WASN'T objectively out of control, as	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.	Giving a powerful tool like this to assist the illegal deportation of immigrants is not good for this city, or this country.
				Consider the extremism that is becoming more palatable by the sheer mass of petitions, requests and threats from this

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

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.	5 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	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)

that not law abiding.	requested in a lawful manner in a supena.		
Please, PLEASE, help protect our innocent residents and citizens! Please please do NOT help ICE!	Sure, great, but NOT to aid illegal and wrong actions on behalf of bad people!	Please do not use this technology to hurt innocent people. Please!	I thought I read on Substack that our police chief was going to protect our people. ?
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.			
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.	No value for individuals; tremendous value for ICE.	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.	
You can be used to Target defenseless individuals.	None	Do the disadvantages outweigh the advantages?	

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

6	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.		The reason given in question 1 is sufficient to reject use of this technology. ICE has become a threat to every American.		
6	3	police power overreach	recycling it into something to enable peace	just don't do it	handshakes are more powerful than digital eyes
6	4	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	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	None	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 They need to consult with privacy advocates, including the ACLU and Electronic Frontier Foundation, to fully understand the threat Once you go down this road, you cannot easily turn back, so you should be incredibly careful and thoughtful.

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

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

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

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 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
--------	--	---	---	---

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

violate the 1st & 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	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.	our autocrat Dictator wanna be President??
--	---	--

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

	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 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

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

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.

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

6	8	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	9	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.		
7	0	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.		
7	1	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

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

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

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

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

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

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

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

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

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

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

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

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”

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

RTCC software companies like Fusus rely on private consumers to expand the camera network which gather enough data to reveal sensitive personal inform				
7 2	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 criminalizatio n of those seeking	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 demonstratio	Most people want to live their lives in peace and have no idea about the harms of this type of data collection. I doubt that many people will give input because they aren't experts in this type of technology and naively believe that it will make them safer.	A functioning democracy needs the population to feel more empowered, not less. This type of technology takes power away from individual citizens and gives it to who knows who-- the highest bidder?
		None		

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

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

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

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

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

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

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

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

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

individuals	women's
could access	health clinics
data to stalk	RTCC
or harass	software
individuals.	creates
The threat to	conditions
vulnerable	that are ripe
communities	for police
is NOT	abuse, as it
hypothetical,	provides
as seen by	little, if any,
the actions of	oversight for
other law	how police
enforcement	use it, little
agencies:	documentati
NYP officers	on or
used mass	auditable
surveillance	logs, and few
technology to	transparency
record and	mechanisms.
monitor	RTCC
everyone	software like
parked in	Fusus
front of a	recruits a vast
mosque, and	assortment of
Birmingham	privately
police also	owned
used this	cameras that
technology, in	allow the
conjunction	company to
with other	bypass laws
tools, to track	and
Muslim	restrictions
residents.	that normally
Homeless	limit police,
residents,	including
who have no	viewing
option for	camera
privacy, are	footage
likely to	without a
become	warrant or
targets of	ongoing
mass	consent from
surveillance.	the owner.
California is	The risk is not
using AI to	hypothetical
identify and	as seen by
target its	other law
homeless	enforcement
residents.	agencies: In

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

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 a cloud-based platform, Customs and Border	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 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
---	---

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

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.

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

people. That is destroying the rights we were given in the constitution.		abusive. So no.		
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

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

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%.
--	--	--	---	---

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

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	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 demonstratio ns advocating for a ceasefire in Gaza. Unfortunately , police violence against protesters is not unprecedented	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.
--	---	---

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

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.

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

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

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

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

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

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

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

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

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

SPD in the SIR mentions the "substantial costs associated with RTCCs, with initial costs ranging between several hundred thousand dollars to \$11 million".

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	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.	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	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 Peacekeeper's Collective There is no value to the proposed change, only harm.	Protect our rights, do not make the proposed change. Use options that have been proven to make a positive difference instead.	Drop this proposal. NO cloud-based offsite RTCC!
---	--	---	--	--	---

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

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.
---	--	--	--

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

n 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	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 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	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 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,	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 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-
---	--	---	---

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

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	for a ceasefire in Gaza. Unfortunately , police violence against protesters is not unprecedented. 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	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 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	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.
---	---	---	--

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

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

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

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 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

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 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

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 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

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

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

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

using AI to identify and target its homeless residents.	(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".	
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. 7 Washington 6 State has the Shield Act	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.	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

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

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 Washingtonia n'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.

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

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

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

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).

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

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:

YxZNd3biwIE/edit?tab=t.0

sure they are not elected next time.

the House GOP passing legislation in the middle of the night.)

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

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

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

investigatory benefits of CCTV has yet to develop.” RRTC is expensive! Let’s use the money toward solving our housing problems rather than surveilling Seattleites. PLEASE DO NOT FORCE SEATTLE TO PARTICIPATE IN A GROWING SURVEILLAN CE STATE. DO NOT VOTE FOR RRTC SOFTWARE!						
8 0	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;	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.	None.	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	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	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

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

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.
---	---	---	---	--

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

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.

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

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.

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

no legal
process to
many who are
trying to obey
our laws.

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 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
--	---	--	--	---	--	---

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

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
---	---	--	--	---	--	--

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

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.	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 Burmingham	it poses to vulnerable communities.	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,	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	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
---	--	--	---	---	--

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

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.

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 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

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.

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

		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... 8 against the 6 people.	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. 8 they do not 7 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		

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

ways of violating us			
Privacy. 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? Where is this content stored? What value does the city see? 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.	

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

used
wrongly/unjus-
tly. I have
experienced
crime in this
area where
there would
have

to use all of
this.

My concerns
are frankly
innumerable.
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. A
cloud-based
RTCC creates
the risk of
data
exposure,
which would
put
essentially
every person
in Seattle at
risk should a
bad actor get
their hands
on the
collected
information.
SPD already
has what it
needs in its
current
system, and
there is no
benefit to

Please see
these links
with more
information
on the
dangers of
this
technology:
<https://www.wired.com/story/license-plate-reader-alpr-surveillance-abortion/>
<https://www.theadvocate.com/us-news/2023/nov/01/idaho-mother-son-kidnap-charges-abortion/>
<https://www.thestranger.com/news/2023/12/21/79315926/texas-tried-to-get-seattle-childrens-hospital-health-records-on-trans-patients/>
<https://www.realtymagazine.com/news/2024/08/07/inside-spd-s->

Absolutely
none.

Please
consider the
cost of this
technology -
both the
literal dollars,
and the
human price
as well. The
negative
impact of
cloud-based
data storage
cannot be
overstated.
Please make
the right
choice to
protect the
people you
were elected
to serve. You
are in a
unique
position to
make a real
difference -
do not
squander that
responsibility.

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

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.t
hestranger.co
m/slog-
am/2024/01/
25/79356578/
slog-am-
seattle-
settles-2020-
protest-
lawsuit-for-
10-million-
nitrogen-
execution-
scheduled-
for-tonight-
no-medical-
care-for-
floridas-
transge
https://www.
aclu.org/new
s/civil-
liberties/majo
r-hack-of-
camera-
company-
offers-four-
key-lessons-
on-
surveillance
https://www.
eff.org/deepli
nks/2023/05/
neighborhood
-watch-out-
cops-are-
incorporating
-private-
cameras-
their-real-
time
https://projec
ts.tampabay.
com/projects
/2020/investi
gations/polic](https://www.the-stranger.com/slog-am/2024/01/25/79356578/slog-am-seattle-settles-2020-protest-lawsuit-for-10-million-nitrogen-execution-scheduled-for-tonight-no-medical-care-for-floridas-transgender-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)

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

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/community-violence-intervention-programs-explained>

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

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

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

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

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

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.

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

	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 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.		

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

	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.				
	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	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.	Police officers are already stretched so thin. I want their focus to actually be on protection and service, not surveillance.	Don't spend money on this technology! As a voter, I am paying attention and will vote and act and canvas accordingly.	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.
9	training for officers.				Thank you for the hard work of city government. Please do the right thing and help public servants by supporting them in other ways.
5	We are not living in normal times. Do not	AI is not ready for prime time. It's not the time to	Please -- don't capture tons of unnecessary	These times are not business as usual.	

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

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. 9 These abuses aren't 6 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? 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	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.	

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

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?

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

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,

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

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.

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

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,

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

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.

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

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

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

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

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

risk. Thank
you.

As our country lurches towards autocratic politicized police state, NOW is not the time to expand police surveillance powers, especially if data is to be				
9 shared with 9 ICE.				
I oppose increased surveillance of Seattle people. I fear it being used				
1 by feds to 0 kidnap 0 people				
It will be used to target minorities, especially by ICE. I believe there are better options for reducing crime. When information goes into the cloud, local organizations		Why don't we find better ways of preventing crime instead of setting up a big brother style system? There are too many ways for that sort of technology to be abused.	What sort of city do we want? Do we want a city where everyone works together to make a safe and welcoming place to live or visit? Or do we want some weird police state where everyone knows we are being watched by	Don't spend money on this. It won't have enough benefits to justify the cost. Technology ages out. In a few years, all of this tech will be obsolete. Lasting solutions involve people working together. It's a harder process and it
1 have less 0 control over 1 it.	None.			

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

			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. Targeting of immigrants, queer people, bipoc, etc. 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.	

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

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.						
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						
104	No	None	It should not be made available to ICE and CPB	No	No	

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

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
redeploy
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

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

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.

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.

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

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.

Privacy, civil rights, avoiding federal surveillance or making it easy for law enforcement to collaborate with authoritarian tactics of fear and surveillance

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

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

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

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. I do not want the federal government to legally or illegally access surveillance 1 data 0 collected in 9 Seattle.	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. 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.
Inappropriate to expand these 1 systems given 1 recent federal 0 overreach.		
The overpolicing of communities is quite concerning.	I see no use of this overreaching surveillance	Please consider the effects it may have on our communities to be

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

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					

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

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.

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

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

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.

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

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

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?

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.

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

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

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

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
attempting to
move the on-
premise
RTCC

1
1
6

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

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-

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

based RTCC
which would
weaken state
laws and
endanger
women, trans
folks, and
immigrant
residents.

False
positives and
the possible
addition of AI
tools reduces
transparency
1 and
1 accountabilit
7 y.

The lack of
trust in SPD
will only get
worse.

With the
FASCIST
regime
currently
occupying
1 our white
1 house, NOW
8 is NOT the

Where is the
moral voice in
the
implementati
on of these --
I can't
imagine there
has been any.

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

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)

subpoenas and governmental pressure to share that data in ways that will be both legal and illegal.	as they collect and store this sensitive data?	and SODA zones, &etc. – are deeply unpopular and not what the people of Seattle want for our city.
Availability of this information 1 from license 2 plate ID to 0 ICE etc.		
- Footage is stored for 30 days. Why is it stored for so long? - 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. - By moving to a cloud-based platform, Customs and Border Control (CBC) and ICE can access automated 1 license plate 2 reader data 1 directly; circumventin	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. Why are we privileging strategies that have not worked to reduce	

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)

abortion and gender care.	if it isn't one already. I am already scared and increased surveillance is only going to make things worse.
I'm very concerned that this technology can be accessed by a national database, making it available to ICE, Border Patrol, and law enforcement across the country. This poses grave danger to all of us in these rife political times with a Federal Government pushing the boundaries of executive powers and overreach. I'm particularly concerned regarding the dangers posed by this technology for our marginalized communities (immigrants, transgender folks, and	I understand that this will add another tool in the 'tool belt' of law enforcement . That said, the risks far outweigh the benefits.

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

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?

The further erosion of privacy. Use to target 1 specific 2 vulnerable 5 groups.	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? Please protect our civil liberties. They are in grave danger at the moment and we need your help to maintain them. Thank you. Thank you for standing up for our citizenry!
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 1 violating 2 court orders 6 and threatening to	The risks far outweigh the rewards. 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? 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

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

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.		that lead to the downfall of democracy and irrevocably ruins peoples lives?	
Data from Seattle's surveillance should NOT be available to ICE or 1 border patrol 2 without a 7 warrant.		I'm fine with police accessing this data to help with crimes. However, this information should be only accessible to police.	
I am concerned that this could be used to violate the 1 rights of 2 people in 8 Seattle.		The theoretical cases in which it could be helpful seem so unlikely that they are not worth mention.	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
		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.	Please vote NO on surveillance technology.

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

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! Track results! 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.

	Traffic cameras should not be incorporated into SPD's Real Time Crime Center. Increasing surveillance is an infringement on the privacy of Seattle residents. It will allow another avenue for federal authorities such as ICE to track individuals, going against Seattle's supposed status as a Sanctuary City.	Increased surveillance will likely affect marginalized communities at a disproportion ate level compared to white Seattle citizens.	Traffic cameras should remain as is without being implemented into SPD.	No	Consider divesting funds from SPD and into social services.	No.	No.
1 3 2	Expanding the surveillance capabilities	I do not want to live in a city that abets the federal			Consider the harm you'll be inflicting, which vastly		

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

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.

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

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.

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

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.

1 I oppose a
3 surveillance
8 state

None

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

1 3 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)

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
---	--	--	---	--

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

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.	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.	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
--	--	---

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

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; circumventing 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.

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

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.

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

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 illiegalley abducted
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. I am tired of being filmed everywhere. There are no rules about data storage. No one takes privacy or safety seriously. How long will these videos be stored? Where will	Traffic cameras make our streets safer by getting people to follow traffic laws. That's it.	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. 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

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

they be stored? Who will have access? There are no governance thoughts put around this.			spending and coming in over budget every single year. It is fiscally irresponsible to keep expanding their budget.		
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			This is a time where we should be coming together as a city. By installing this technology you are breaching a level of trust with your constituents. This will not be forgotten. Please please do the right thing and do		
1			No I do not. It		
4			is a slippery		
2			slope to go		
			down with		
			this.		
		Please don't 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 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	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	None. 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.
---	--	---

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

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.	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.	
I’m against SPD obtaining a cloud-based RTCC which would weaken state laws and endanger women, trans folks, and immigrant residents.	Less surveillance, not more.	This a dangerous direction and a slippery slope eroding our freedom.
This technology will not decrease crime and is ripe for abuse.	None	Investing in communities is the most effective way to decrease crime.