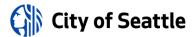
Template last revised February 19, 2025

	Nick Zajchowski SPD Closed-Circuit Television Camera Systems Material Update D1a	e ORD	
1	Section 2. This ordinance shall take	effect as provided by Seattle Municipal Code	
2	Sections 1.04.020 and 1.04.070.		
3	Passed by the City Council the	day of, 2025,	
4	and signed by me in open session in authen	tication of its passage this day of	
5	, 2025.		
6			
7		President of the City Council	
8	Approved / returned unsigned /	vetoed thisday of, 2025.	
9			
10		Bruce A. Harrell, Mayor	
11	Filed by me this day of	, 2025.	
11	Filed by me this day of _		
12			
13		Scheereen Dedman, City Clerk	
14	(Seal)		
15	Attachments:		
16	Attachment 1 – 2025 Surveillance Impact F	Report: Closed-Circuit Television Camera Systems	
17 18	Camera Systems	Report Executive Overview: Closed-Circuit Television	ЭП
	Template last revised February 19, 2025	3	



2025 Surveillance Impact Report

Closed-Circuit Television Camera Systems

Seattle Police Department

Surveillance Impact Report Versions:

- 2024 Surveillance Impact Report: Seattle Police Department Closed-Circuit Television Camera Systems adopted by <u>Ordinance 127110</u> on 10/08/2024.
- 2025 Surveillance Impact Report: Seattle Police Department Closed-Circuit Television Camera Systems



Surveillance Impact Report ("SIR") overview

About the Surveillance Ordinance

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

How this Document is Completed

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

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

Surveillance Ordinance Review Process

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

Upcoming for Review	Initial Draft	Open Comment Period	Final Draft	Working Group	Council Review
The technology is upcoming for review, but the department has not begun drafting the surveillance impact report (SIR).	Work on the initial draft of the SIR is currently underway.	The initial draft of the SIR and supporting materials have been released for public review and comment. During this time, one or more public meetings will take place to solicit feedback.	During this stage the SIR, including collection of all public comments related to the specific technology, is being compiled and finalized.	The surveillance advisory working group will review each SIR's final draft and complete a civil liberties and privacy assessment, which will then be included with the SIR and submitted to Council.	City Council will decide on the use of the surveillance technology, by full Council vote.



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.
- When a technology is required to complete the surveillance impact report process. This is one deliverable that comprises the report.

1.0 Abstract

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

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

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

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

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



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

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

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

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

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

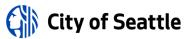
SPD's proposed CCTV camera systems would capture video of identifiable individuals, some of whom may be unaware of the recording, despite signage. Without appropriate safeguards, this raises significant privacy concerns which has resulted in this review. Recognizing these concerns, SPD proposes the CCTV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

2.0 Project / Technology Overview

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

2.1 Describe the benefits of the project/technology.

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



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

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

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

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

2.2 Provide any data or research demonstrating anticipated benefits.

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

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

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

² Ibid



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

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

Here are some additional studies that look into these technologies:

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

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

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

2.3 Describe the technology involved.

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



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

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

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



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

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

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

3.0 Use Governance

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

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

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

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

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



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

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

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

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

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

Supervisors and commanding officers are responsible for ensuring compliance with policies.

CCTV camera systems will only be made accessible to authorized SPD, OPA, and OIG personnel. Authorized personnel will receive training in the CCTV video management system prior to authorization.

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

4.0 Data Collection and Use

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

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



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

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

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

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

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

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

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

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

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

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

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



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

4.4 How often will the technology be in operation?

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

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

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

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

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

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

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

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

Access to video evidence is controlled by SPD Manual Title 12 provisions governing Department Information Systems including <u>SPD Policy 12.040</u> - Department-Owned Computers, Devices & Software, <u>SPD Policy 12.050</u> - Criminal Justice Information Systems, <u>SPD Policy 12.080</u> – Department Records Access, Inspection & Dissemination, <u>SPD Policy</u>

³ <u>"Test-As-You-Go" for Hot Spots Policing: Continuous Impact Assessment with Repeat Crossover Designs | Cambridge Journal of Evidence-Based Policing (springer.com)</u>



<u>12.110</u> – Use of Department E-mail & Internet Systems, and <u>SPD Policy 12.111</u> – Use of Cloud Storage Services.

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

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

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

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

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

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

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

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

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

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



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

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

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

5.0 Data Storage, Retention and Deletion

5.1 How will data be securely stored?

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

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

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

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

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

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



<u>SPD Policy 7.010</u> 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 <u>SPD Policy 6.060</u>, 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 (<u>SPD Policy 5.001</u>), and any employees suspected of being in violation of laws or policy or other misconduct are subject to discipline, as outlined in <u>SPD Policy 5.002</u>.

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

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

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

6.0 Data Sharing and Accuracy

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

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

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

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

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



Per <u>SPD Policy 12.080</u>, the Crime Records Unit is responsible for receiving, recording, and responding to requests "for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies."

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

SPD shares data with authorized researchers pursuant to properly executed research and confidentiality agreements as provided by <u>SPD Policy 12.055</u>. This sharing may include discrete pieces of data related to specific investigative files collected by the devices.

6.2 Why is data sharing necessary?

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

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

Yes ⊠ No □

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

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

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 <u>SPD Policy 12.055</u>. Law enforcement agencies receiving criminal history information are subject to the requirements of <u>CFR Title 28, Part 20</u>. In addition, Washington State law enforcement agencies are subject to the provisions of <u>WAC 446-20-260</u>, and <u>RCW Chapter 10.97</u>.



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

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

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

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

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

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

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

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

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

7.0 Legal Obligations, Risks and Compliance

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

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



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

<u>SPD Policy 12.050</u> mandates that all SPD employees receive Security Awareness Training (Level 2), and all employees also receive City Privacy Training.

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

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

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

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

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

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

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



8.0 Monitoring and Enforcement

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

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

Per <u>SPD Policy 12.080</u>, the Crime Records Unit is responsible to receive and record all requests "for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies."

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

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

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



Financial Information

Purpose

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

1.0 Fiscal Impact

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

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

Current \boxtimes potential \boxtimes

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

Notes:

Please consult the material update summary and fiscal note.

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

Current \square potential \boxtimes

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

Notes:

1.3 Cost savings potential through use of the technology

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

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

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



Expertise and References

Purpose

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

1.0 Other Government References

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

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

2.0 Academics, Consultants, and Other Experts

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

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



3.0 White Papers or Other Documents

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

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



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 define	ed the following inclusion criteria in the surveillance
ordinance, and they serve as impo	ortant 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 impa	acts disadvantaged groups.



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

The technology will be used for the following purposes:

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

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



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

To mitigate these potential community concerns, SPD will:

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

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

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

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

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



right policing is achieved with undue collateral harm.

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

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

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

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

□ all S	eattle neighborhoods	
	☑ Aurora Ave N 85th to 145th	☐ Northwest
	☐ Ballard	☐ Madison Park / Madison Valley
	⊠ Belltown	☐ Magnolia
	☐ Beacon Hill	☐ Rainier Beach
	☐ Capitol Hill	☐ Ravenna / Laurelhurst
	☐ Central District	\square South Lake Union / Eastlake
	☑ Chinatown/International District	☐ Southeast
	☐ Columbia City	☐ Southwest
	☑ Downtown Commercial Core	☐ South Park
	☐ Delridge	☐ Wallingford / Fremont
	☐ First Hill	☐ West Seattle
	☐ Georgetown	☐ King county (outside Seattle) (Mutual
	☐ Greenwood / Phinney	Aid)
	☐ International District	☐ Outside King County (Mutual Aid)
	☐ Interbay	
	☐ North	
	☐ Northeast	

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



Downtown & Belltown Area



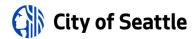


Chinatown-International District Area



Aurora Avenue North Corridor (Aurora Ave, 85th to 145th Streets)



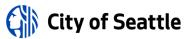


1.4.1 What are the racial demographics of those living in this area or impacted by these issues?

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. <u>SPD Policy 5.140</u> 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, <u>SPD Policy 5.140</u> 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 biasbased policing and outlines processes for reporting and documenting any suspected biasbased behavior, and other accountability measures.

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



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

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

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

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

acquisition, general tracking metrics for surveillance technologies, retention requirements and limitations, and general use requirements for surveillance technologies.

2.0 Public Outreach

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

3.0 Public Comment Analysis

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

3.1 Summary of Response Volume

Please see Appendix B.

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

Please see Appendix B.

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

Please see Appendix B.

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

Please see Appendix B.



3.5 Question Four: General response to the technology.

Please see Appendix B.

3.5 General Surveillance Comments

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

Please see Appendix B.

4.0 Response to Public Comments

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

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

5.0 Equity Annual Reporting

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

The goals of this project are:

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

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

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



Privacy and Civil Liberties Assessment

Purpose

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

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

Working Group Privacy and Civil Liberties Assessment

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



Appendix A: Glossary

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

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

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

DON: "department of neighborhoods."

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

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

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

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

OCR: "Office for Civil Rights."

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

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



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

RET: "racial equity toolkit"

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

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

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

Surveillance ordinance: Seattle City Council passed ordinance <u>125376</u>, 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 <u>125376</u>.

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



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



CCTV 2025 Material Change, public comment received via Privacy Inbox

June 23rd, 2025

Dear Seattle City Leadership,

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

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

Concerns & Recommendations:

- 1) SPD lied to the public and City Council: SPD never intended for the CCTV system to be a pilot.
 - (a) The original SPD CCTV SIR was approved in October 2024. The wording in the original SPD CCTV SIR and the presentations by SPD to the public and to City Council described the CCTV system as a "pilot" (and verbally SPD also called it an "experiment") that would include data analysis and reporting back at the 1-year and 2-year marks; and that the pilot program would be terminated if the data suggests the technology is ineffective.
 - (b) The first SPD CCTV cameras were mounted in the CID as of at least May 5th, 2025 and the whole SPD CCTV program was supposed to go live on May 20th, 2025.
 - (c) The RTCC & CCTV material update process opened for public comment on June 3rd. This means that most of the cameras had only been up for 14 days and the longest any camera had been installed was still less than a full month.
 - (d) The updates to the SPD CCTV SIR includes both expanding the geographic footprints that will have these surveillance cameras across the City and making the SPD CCTV system permanent, not a pilot anymore. So not only did SPD not wait to have even one year's worth of data but the timing of the release of the updated SIR to the public means that SPD had to have already been drafting the changes to make it permanent before even all so called pilot cameras were deployed.
 - (e) SPD just used the "pilot" as a way to have an easier-to-approve SIR go through the entire Surveillance Ordinance process while having the more contentious (expanded & permanent cameras) version go through the expedited Material Update process (which doesn't require Seattle IT to hold any public engagement meetings, doesn't have an updated RET, doesn't get reviewed by the Community Surveillance Working Group, and deletes the record-breaking amount of negative feedback the City received when the original SIR was being reviewed).
- (f) SPD's deception is just hastening the erosion of any trust the community might have in the department. If your word means nothing - If you can't be honest in even your descriptions of your roadmap, then why should you ever be trusted to operate a surveillance technology? Recommendation: SPD must not deploy CCTV (and certainly not implement any of the material

<u>Recommendation:</u> SPD must not deploy CCTV (and certainly not implement any of the material updates proposed) - no City department should be rewarded for lying to the public or City Council.

- 2) <u>No efficacy</u>: Existing data from a recent meta-analysis of the use CCTV systems, which is the same paper SPD referenced in their CCTV SIR, does not support deploying CCTV to reduce violent crime, as SPD proposes to do:
 - (a) Specifically, the 2019 paper by Eric L. Piza (of City University of New York (CUNY)) and et. al titled "CCTV surveillance for crime prevention. A 40-year systematic review with meta-

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- analysis" [https://doi.org/10.1111/1745-9133.12419] states, "No significant effects were observed for violent crime or disorder" [Piza pdf page 21]; and instead that significant reductions were primarily seen in vehicle crime and property crime [Piza pdf page 20].
- (b) The paper also shows that the vast majority of studies that looked at CCTV deployed in city centers (as SPD plans to do) found either undesirable or no significant effect (in 26 out of 33 studies) [Piza pdf page 18] and that the largest & most consistent effects were for CCTV deployed within car parks [Piza pdf page 29], which is not what SPD plans to do.
- (c) SPD's framing of research as supporting their plan is (at best) misleading the public, since SPD didn't say (in SIR item 2.2) that the "specific crime problems in specific geographic places" where CCTV has been effective were regarding vehicle/property crime primarily in car parks.
- (d) In CCTV SIR item 2.2 SPD says, "The federal Department of Justice, the National Institute of Justice, and George Mason University's Center for Evidence Based Crime Policy rate the technology as 'promising'"; but SPD didn't cited where this rating is supposedly taken from. Given how misleading the other statements on efficacy of the technology are in the SIR, it's hard for the public to have trust regarding this statement.

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

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

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

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- 4) Erosion of trust: Wide-spread deployment of CCTV will erode the trust individuals have in their neighbors and community. It creates the perception that everyone is watching them and they need to watch everyone else that no place is safe. Just because certain public areas don't have an expectation of legal privacy does not mean they should instead have an expectation of surveillance (public or private). People should feel confident to move about their day throughout their community (irregardless of their geographic neighborhood) without feeling like their every move is being watched and recorded. The push towards this technology is also a push towards instilling a sense of paranoia.
 - (a) Moreover, this also specifically causes an erosion of trust between SPD and the communities they serve because SPD is constantly lying. For example, SPD lied when they told the public during the IT's public engagement meetings that the cameras were not going to be live monitored and then immediately turned around and told City Council they would be (and that they'd need yet more additional funding for that). And SPD lied about the costs, which keeps ballooning every time they publicly discuss the technology. And SPD lied when they said it was a pilot program.

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

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

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

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

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

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

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

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

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

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

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

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

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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).

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

- 10) <u>Undisclosed/Unapproved surveillance features:</u> In item 2.3 of the CCTV SIR, when describing "Edge-Based Analytics capabilities", it says, "SPD will not use AI face recognition tools." However, face recognition isn't the only concern:
 - (a) Gait recognition, behavior analysis, and emotion analysis would also be concerning functionalities that the system might have. None of those tools should be used on the CCTV video data.
 - (b) Additionally, SPD hasn't confirmed that they will only use a CCTV product that allows them to disable such features system-wide. This is important because without it, it relies on each individual accessing the system not clicking the wrong buttons - meaning there is no technical guardrail; and past behavior from SPD has shown that individual employees are willing to violate both SPD Policy and the Surveillance Ordinance (i.e. <u>OPA Case 2020OPA-0305</u> and OPA Case 2020OPA-0731).
 - (c) SPD has not disclosed to the public what are all the edge-based capabilities are they want to use, so it's impossible for the public to provide a critique of their accuracy (especially the possible racial and/or age-based biases of those). Since SPD didn't list any accuracy checks they will perform in item 6.5 of the SIR, it seems SPD expects the City to just trust whatever functionality the vendor provides without any checks-and-balances on that.

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

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

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

- 12) Excessive data retention: The CCTV SIR says that SPD plans to retain CCTV data for up to 30 days. This has multiple issues:
 - (a) Retaining the CCTV data for such a long period of time enables stalkers to issue Public Records Act (PRA) requests (potentially repeatedly) for CCTV data to use against their victims.
 - (b) It also means that bounty hunters from states outside of WA can use the PRA request process to get access to CCTV data without needing to issue a warrant. This is yet another way this

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

- 14) <u>Training:</u> Item 3.3 of the CCTV SIR says, "Authorized personnel will receive training in the CCTV video management system prior to authorization." and item 7.2 says, "SPD Policy 12.050 mandates that all SPD employees receive Security Awareness Training (Level 2), and all employees also receive City Privacy Training." SPD does not mention creating nor providing any privacy or ethics training specific to the CCTV system. There should be training that:
 - (a) Advises that the cameras must not have their pan, tilt, or zoom altered to look inside private residences, to stalk/harass individuals, or to otherwise use the system for personal reasons)
 - (b) And that CCTV operators must not move the camera's viewing angle away from an area of police response, while police are still present.

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

Please seriously consider my public comment. Thank you.

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

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

13) Security & Compliance:

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

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

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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

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

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

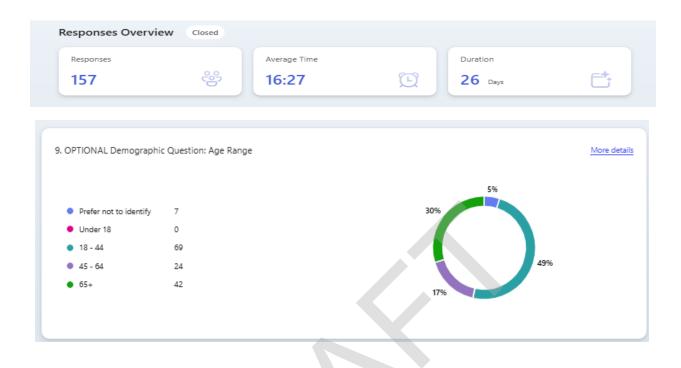
I am opposed to these systems, to the Mayor and City Council expanding surveillance, and any officials in Seattle, King County, and Washington State (frankly, in the country) to cooperating with ICE.

KNOCK IT OFF

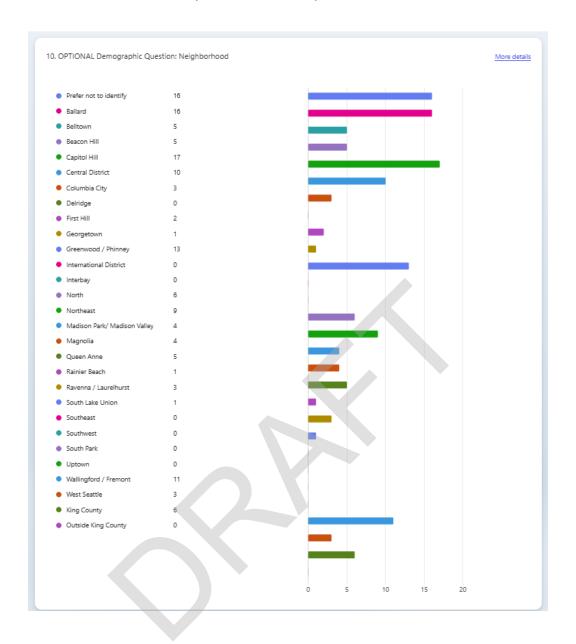
Sincerely,

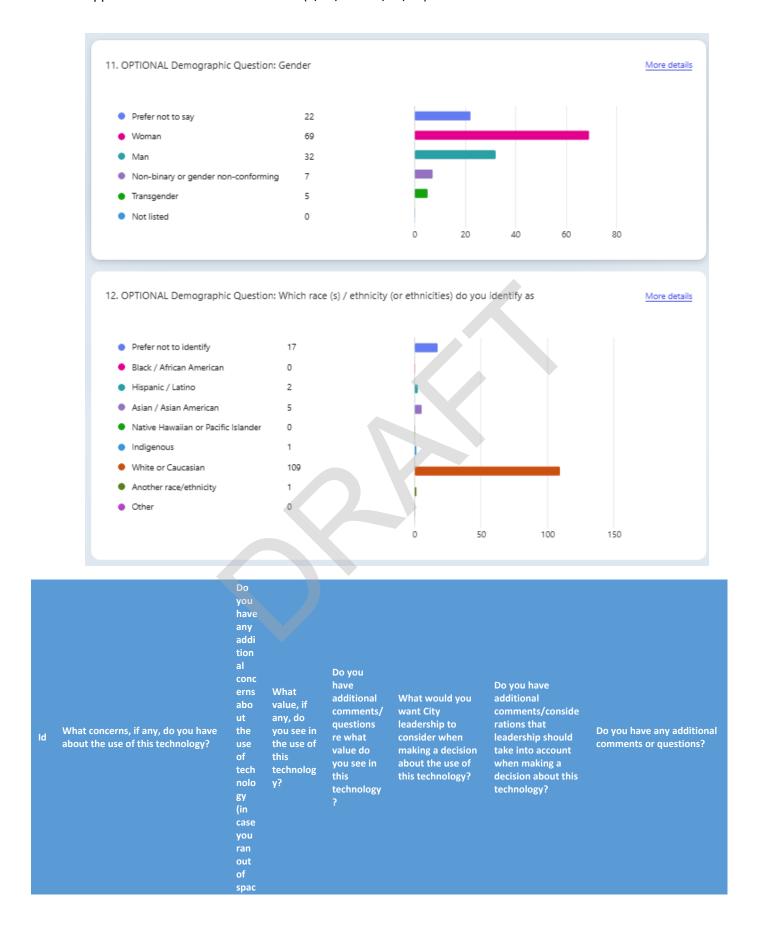
Joelle Pretty, Seattle

Responses received via form:



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





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

This is excessive surveillance.
We could be using these funds in so many other ways.
We know that excessive surveillance tends to
disproportionately impact homeless people, Black people, immigrants, and other communities who already have enough to deal with.

None

I urge City leadership to use an equity lens when making this decision. Who are the communities most impacted? How are their human rights being violated, whether intentionally or unintentionally? What could we be doing with these funds instead, that wouldn't involve surveilling people?

This technology is not proven to provide any measureable differences on crime outcomes. It is rife is potential abuse and misuse. We have a right to a degree of privacy in public spaces.

No value what so ever.

Consider the impact that this has on our populace especially the most vulnerable among us. This doesn't help them. We should be using the limited money we have on proven effective methods of addressing crime.

Lack of safeguards for the data, conducting this surveillance is an invasion of privacy, and it will likely be used to target already marginalized communities. This technology will not make us any safer.

None.

None.

Loss of public privacy and the technology being used for nefarious means by the government.

Stores already have their own cameras, why do we need them all over the public? They are not used to make us safer,

YES.

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

tr o tl a o ir y	hey are ools to oppress he public and I for one feel mmensel v less safe vith it.
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CCTV will NOT reduce violent crime or aid in police investigations.

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

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

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

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

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

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

CCTV poses a threat to civil liberties

SPD officer abused surveillance to stalk a "hot" SPD employee

The University of Hull Department of Social Policy

expanding this now that we see the rise of authoritari anism in our country. It could be "used for good" (I don't really believe that) but it can also absolutely be used for depending who controls it. I don't trust it.

No.

I worry

about

You have allowed ICE access to this footage. Shame on you. We're watching.
We're watching
our country
devolve into
authoritarianism.
You can choose to
take actions to
help it or not.

SPD has been cooperating with ICE. Are we not a sanctuary city anymore?

I want to know why you put SPD over your citizens?

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

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

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

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

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

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

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

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

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

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

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

adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions such as the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention and the Rainier Beach Action Coalition and their Restorative Resolutions project, which has already reduced violence in the Rainier Beach neighborhood by 33%. These programs save money, research has shown every \$1 invested saves \$33. Richmond, CA has chosen to invest in violence interruption and other community-led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighboring cities like Oakland and San Francisco that have increased their police budgets and ha

9	This technology will be used unfairly to bias against marginalized communities. There won't be awareness that people are being surveilled by the police.		None		Consider telling people that you're planning to do this. Don't pretend to pilot the technology then ask for full access to the CCTV cameras immediately after the pilot starts.		
1 0	There's no way to train out bias in a consistent way. Nor in a way that gets rid of it 100% within in organization. This technology will be used to by the people who are biased and hateful to persecute those they feel are lesser. Mark. My. Words.	Just read it again.	None, for me basically. There is only value for the people who want to see others they hate persecute d.	Panopticon .	A right to privacy can extend to spaces where we want to feel alone. When there is a literal surveillance of everyone in the city, there is nowhere that one can feel at peace. The city is already isolating in a backwards way. Why can't we be able to choose when we are alone and when we are not?	nope	Would be best if we just had cameras in everyone's homes running all the time?
1 1	I don't want to live in constant surveillance when our current president is using it to arrest people who disagree with him or even when we have a decent president, hope that clears things up for you	You're ushering in a police state with all this surveillance while the president is arresting people who disagree with him? Please stop	zero	yeah, spend the money on social safety nets instead of cops and surveillance	instead of ushering in a police state, fix the homeless problem and tax the rich	Yeah, y'all need to tax the rich and support affordable housing before you put in cameras to watch out every move	
1 2	The cameras will obviously be used to create a penopticon to rope in LGBTQIA+, minorities, and other groups the Trump administration doesn't like. They should not exist.		None. It only benefits fascists and autocrats looking to destroy our rights.		The First and Fourth Amendments.	You have a chance to be on the right side of history, or just be more oppressors.	

surveillance will lead to increased policing, particularly of vulnerable communities, and particularly reinforcing the school-toprison pipeline in the case of cameras at schools. I'm also particularly concerned about police using this technology to further harass peaceful protestors given the current political climate, SPD's relationship to the current president (which can be inferred by 6 members of SPD participating in the January 6 attempted coup) and the long history of abuses by SPD against Seattle residents, queer residents especially (see: recent arrest of a trans person at Denny Blaine for simply enjoying the space like everyone else). Seattle's budget is already wildly bloated by spending money on our police force, this will only further that bloat. I wish we could dedicate these funds to something actually meaningful to residents like improving infrastructure and increasing affordable housing. I also worry that the data gathered by these cameras will end up sold to and/or held by private corporations, further invading our privacy as private individuals.

I'm concerned that increased

None, more cops have not made Seattle safer, just more policed. panopticon to keep us safe? Has increasing police resources and invading communities ever increased safety? Who would be able to access the data gathered? Have SPD proven themselves to be responsible enough to manage this data? Do SPD have a vested interest in drumming up fears around crime? Should we exacerbate historic abuse perpetuated by police against POC and queer residents and high school students by increasing surveillance and by extension police presence? Would you put these in your neighborhood, or any of the public spaces you frequent? What groups are most likely to have their behaviors interpreted as criminal when existing in public spaces?

Do Seattle residents need a

This kind of surveillance instills a sense of fear into the communities it is installed in. Also the increase in policing that will invariably follow these installations will disproportionately affect homeless populations, people of color, and queer people. We don't need more surveillance and policing. We need resources and community support.

None

Police cannot be used as a blanket "solution" to community safety and security. They actively make our communities less safe, especially when police forces (as they often do) contain white supremacists and virulently queerphobic people. I guarantee you that police will use these cameras as pretense to raid queer spaces and lead to even more fear and suffering on behalf of a queer community that is already under attack. But maybe that's what the city wants to see anyway considering the all but warm welcome city government has given to anti-trans bigots in cap hill and at city hall recently. Please don't make Seattle another place queer and trans people have to fear when it is one of the few safe-enough places we have left. Our communities need housing, healthcare, nutritious food, safe and accessible drinking water (I have friends who haven't had working water in their homes for months), walkability, and accessible transit. We need community care and safety measures, not policing.

I am concerned that this technology infringes upon citizens' rights to privacy as well as targets and endangers marginalized groups including the queer community, people of color, and immigrants. Consider how implementing this technology will change the way people act under perceived surveillance and the way law enforcement will engage with your constituents.

Increased surveillance technology will inevitably be used disproportionately against marginalized

1 communities to criminalize 6 and police their lives. This technology is ineffective, unnecessary and only creates an anti-social environment for our city.

Racial profiling, surveillance state, increasingly untrustworthy federal government (which SPD

7 sometimes cooperates with). SPD should have to earn the trust of the people, and they

have not done so.

These technologies invade people's privacy and do nothing to prevent crime from happening. Instead of expanding surveillance, we should be investing in violence prevention and restorative justice efforts. There is also a significant concern that by continuing to expand CCTV access, we set up opportunity for folks coming to Washington to access medical care (abortions and gender affirming care) from other states to be monitored and

punished by their state governments.

Who does it benefit? Who does it serve? Who is asking for this? How will it realistically be used? Who will be harmed?

None

None

None.

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

A 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." https://academicworks.cuny.edu/cgi/viewcontent.cgi?arti cle=1275&context=jj_pubs

British Home Office study found CCTV did not reduce crime or make people feel safer http://news.bbc.co.uk/1/hi/e ngland/leicestershire/429469 3.stm

A Dallas, TX study showing the only increases in clearance rates are for thefts. https://link.springer.com/arti cle/10.1007/s11292-021-

09477-8

9

CCTV cameras pose a massive risk for everyone.

ICE has access CCTV footage from across the country including Washington State & supposed "sanctuary" states. https://www.404media.co/ic e-taps-into-nationwide-aienabled-camera-networkdata-shows/

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

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

Absolutel y none. This technolog y is an abuse of power with a universal adapter and should be removed from

Seattle.

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

The issues on

CCTV are very well

documented and

all came up last

year when the

Seattle

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

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

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

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

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

Studies

2 0	It turns the city into a surveillance state and has much potential for abuse.	have shown that it doesn't reduce violent crime, so ultimately what is the point.	None	Vulnerable communities that will fall victim due to abuse and misuse of this technology.
	I am concerned about the study that SPD cited to expand these cameras that			How are you measuring the effectiveness of

study that SPD cited to
expand these cameras that
showed these cameras do
not affect violent crime rates
and clearance rates, which
are the two things most
concerning in terms of public
safety. I am concerned that
SPD has collaborated with ICE
and will share this
information to target
immigrants. I am concerned
that police officer in Texas
used WA CCTV camera
footage to monitor people
going to abortion clinics.

Do you have evidence that the CCTV you have is working? measuring the effectiveness of this technology? What is success and what is failure, and can you articulate a measurable standard? If it doesn't meet that standard, would you have the courage to roll it back? Can you roll it back, or do the police not answer to you?

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

with other agencies.

2

CCTV surveillance raises

serious concerns about civil

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

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

oversight.

City leadership

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

the use of CCTV in our city. CCTV does not increase our safety as a community, it collects data about our movements as individuals, imposes psychological limitations on our freedom, creating a big brother dynamic with the city and state. More concerning is that there is plenty of historical and present day evidence that surveillance systems like this are used to trample civil liberties including that data being shared with ICE, against citizens who are invoking their free speech rights to protest, women and people seeking abortion care (the list goes on).

I am deeply concerned about

to create safe communiti es, invest in people not surveillance technology. Studies show that the following work: violence interruptio programs, increased public transit, restoring vacant land, green spaces, community hubs like public libraries,

mental

abuse

health and

substance

treatment

support to

reduce and

eliminate

poverty, etc. No one said any of the above is easy or immediate, but the longer term ramificatio ns is supremely better than trampling on people's civil liberties.

centers,

income

None

If you want

I will not vote for anyone that is a part of expanding the city's CCTV network.

This will be used to surveil the same people being targeted by the trump administration - racialized

people, poor people, youths, queer and trans people!

Stop expanding

surveillance

- CCTV poses a threat to civil liberties. See item 2 in this document for specific examples: https://stopsurveillancecity. wordpress.com/closed-

wordpress.com/closedcircuit-television-camerascctv/ - Cameras have been caught

- panning away from police violence to avoid creating evidence of the police's actions
- (https://www.bloomberg.co m/news/articles/2011-12-27/when-police-abuse-
- 2 27/when-police-abuse-5 surveillance-cameras).
 - Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie Gray

Gray (https://www.thedailybeast.c om/how-baltimore-copsdoctored-footage-of-freddiegrays-arrest). None that would outweigh its harms.

shown that CCTV does not reduce violent crime or aid in police investigations. Meanwhile, investing in community-led solutions and restorative justice practices (over punitive/carceral/ police-and-prisons practices) have been SHOWN to be effective in increasing public safety and lowering crime. I want City leadership to invest in solutions that have been proven to be effective, not CCTV which has been proven NOT to be effective.

Studies have

See this document (https://stopsurve illancecity.wordpr ess.com/closed-circuit-television-cameras-cctv/) for many specific examples and studies reaffirming the ineffectiveness of CCTV.

See item 4 in the same document for specific examples of the many effective tools the city should use instead that are actually shown to decrease violence.

community well-being. These cameras disproportionately target BIPOC and low-income neighborhoods, reinforcing systemic racism and a presumption of guilt. The presence of surveillance creates a climate of fear and control, not safety, and erodes trust in public institutions. The Seattle Police Department has a documented history of misusing surveillance tools including spying on activists and leaking personal datamaking it clear that abuse is not a hypothetical risk. This technology also poses a direct threat to our city's sanctuary policies and to people seeking abortion or gender-affirming care,

especially when data is

with other agencies.

stored in the cloud or shared

CCTV surveillance raises

serious concerns about civil

liberties, racial justice, and

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oversight.

City leadership

must consider the

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

2

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

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

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

. But I know greater police presence and surveillance do not stop gun violence. Community programs that give youth resources $\quad \text{and} \quad$ opportuniti es, social services that allow families to get stable work, housing, food, transportat ion, are what make communiti es safer.

I'm a
Garfield
high school
and
Washingto
n Middle
school
alum and
the recent
shootings
there are
devastating

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

I have concerns that this will be used to profile and target

the most marginalized in our community

None

That SPD is consistently violent and have been under federal oversight for many years due to their actions- they don't need more tools to bully, harass, and assault people

There is no evidence that installing CCTV is going to effectively stop crimes. It will make the public feel watched and uncomfortable, especially those who are often subject to profiling by police departments. We do not need a surveillance state, especially one that local police who are in contention with public opinion have control over. Especially in minority and queer places. It also sets up a precident for further authoritarian pressure and control on daily lives of citizens. It is in

opposition of freedom. It is security by aggression. While people should feel safe, they should also feel free. Safety should not have to come at

cost.

None

How much authority over the lives of citizens they should exact. Does the state have the authority to be constantly monitoring its citizens. Is this security or is this control?

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

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

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

their rights to not be filmed

3

would be no value technolog

There

of this

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

too risky to

do.

Please do

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

I want you to

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

Please refer to what

I previously stated: This technology will

make the city of Seattle a

dangerous, more

unwelcoming

to be abused to stalk people and have led to abusive behaviors from operating the cameras to stalk

people in their

homes. These

private spaces and

Do not enforce this technology.

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

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

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

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3 6	expensive and ineffective	we do not need to expand surveillance	none
3 7	There is very little evidence to show this stops crime. Even the study that SPD cites states that surveillance of this type had little to no effect on preventing or stopping crime. This surveillance will increase harassment of our communities and honestly, prevent them from thriving. Some of the culturally richest spaces in our city will be devestated by this.		None. This is a gross waste of If the research resources doesn't show this that could is beneficial, why be are we spending directed money on this? to actually preventin g crime.

40 year systematic review with meta-analysis of the efficacy of CCTV - concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." I am concerned that expansion of CCTV and the risk it poses to vulnerable communities. CCTV will become a part of SPD's growing and expansive network of surveillance that is part of RTCC and accessible to agencies like ICE and Customs and border control putting our immigrant communities at further risk. SPD has been inconsistent in whether cameras will be monitored 24/7 or only accessed in an investigation but the data is accessible to SPD as well as any law enforcement agency across the country for warrant-less searches.

3

The only study SPD cites - a

CCTV has not been shown to be effective as an investigator y tool. been shown to be effective decreasin g car theft in parking lots. But not of the locations that CCTV is being expanded too fit that definition - so I do not see a benefit to this material update

CCTV has

these two technologies " Evan with a Public input into seemingly the obtaining of "neutral" these technology technologies in - members the first place was overwhelmingly of LGBTQ+, negative. Much of immigrant, and BIPOC the public feedback warned communiti es are that surveillance disproporti tools would be used by ICE and onately surveilled. CBC to violate Given the sanctuary city areas most laws and that red heavily states would use currently surveillance tools surveilled to track those seeking abortion and the proposed care or genderexpansion affirming care. SPD will Now, reports are certainly coming in that this ensure this is in fact trend happening. continues. https://www.theu rbanist.org/2025/ 06/19/license-

This technology is enormously expensive with little to no public benefit and potential for great public harm. Seattle Community Surveillance Working Group's report on CCTV & RTCC "a majority of the working group is unsupportive of any pilot deployment of

This "material update" of surveillance is putting further weapons in the hands of the Trump administration. We will hold our public officials accountable for these decisions especially as we

plate-readersproliferate-inwashington-iceoverreach/ Look at the research. a 40 year systematic review with meta-analysis of the efficacy of CCTV - concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." This is the study SPD cited in the original SIR. If they had bothered to read the study they would see that it does not support SPD's claims.

see SPD act as "mutual aid" to federal agents and assist in disappearing our community members. Meanwhile Mayor Harrell and city council fail to $\qquad \text{make the kind of} \qquad$ material investments in community that actually lead to public safety.



This is dangerous and infringes on our American right to organize. Increased surveillance will just allow for more government overreach into our personal lives, and directly contradicts with small government values.

3 The SPD has demonstrated 9 bias against transgender people (recently on May 24th in Cal Anderson), and also against others such as homeless people, migrants, and people of color. CCTV will

nomeless people, migrants, and people of color. CCTV will allow police to attack those people and find ways to arrest people for any reason, regardless of justification.

I am deeply concerned about

the proposal to increase surveillance in my neighborhood. The SPD has not proven they will use this power responsibly, and I do not want myself or my neighbors to feel surveilled in our community.

government organization: outside of Se requesting or footage and putting you i

whether you want to have government organizations outside of Seattle requesting our footage and putting you in danger, or if you want your location to be known by those who despise you.

Think about

American values are about protecting our right to organize and allowing all to be free to demonstrate and protest against tyranny.

reduce violent crime or aid in police investigatio ns. CCTV poses a threat to civil liberties. Police control CCTV camera, the cameras see what the police want them to see.

CCTV will NOT

4 1

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

Please consider both the evidence

Surveillance is a powerful tool of social oppression. This will only increase violence. It will only lead to more discrimination and division. Adding more surveillance technology will only increase crime and increase violence towards innocent people

No. This is not the answer to a safer communit y

There is no value to this technology

Consider that Seattle is a safe haven for so many. Adding more surveillance technology will only increase crime and increase violence towards innocent people. Think about putting the funding for this into things that will actually help the Seattle community during this time

CCTV has no impact on

4 deterring violent crime. It6 could be used for profound privacy violations.

None.

CCTV is only a surveillance tool, it does nothing to prevent or address the causes of crime. Our resources could be deployed more valuable elsewhere.

I'm deeply concerns that the police will use the information gathered by this technology to violate people's privacy. I'm even more concerned that the federal government will get its hands on this information and use it to terrorize the people of Seattle.

None whatsoev er.

I see no

How the Trump administration could use the information gathered by this technology to promote its authoritarian agenda.

This technology will be implemented to profile individuals and create situations where folks are surveilled and monitored more than what is necessary to reduce crime. More cameras are not the answer here.

value to this technolog y, and I see this as a thinlyveiled ruse to allow for more police interventi on into daily life. This is dangerou

How this technology will truly be used, and if more police attention on the movement of the residents of Seattle is truly necessary (it's not).

s technolog y that is not aimed at crime reduction.

In a

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

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

great.

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

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

mass-surveillance.

Yes, I do have massive

None. Get rid of it. Now.

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

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

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

Freedom of movement for all of us.

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

The value is not to ordinary citizens, but to an evergrowing authoritar ian presence.

Research has shown CCTV has no significant effect on violent crime. I am a retired lawyer and spent many years as a prosecutor. I do not make objection without considerable thought. We simply do not need to spend more money providing invasive surveillance.

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

Where do I begin? (1) CCTV,

I see no value in the potential use of this technolog y; I see only the potential for abuse and further movemen t toward a police and governme nt surveillan ce state.

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

I ask that our city

Do not go there.

police power overreach

recycling it into somethin g to enable peace and kindness

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

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

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



CCTV will NOT reduce violent crime or aid in police investigations. The only study SPD cites - a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer. A study of Dallas, TX found "[CCTV] cameras are likely not cost-effective in terms of increasing clearances" due to any increases in clearance rates being mostly limited to thefts. Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved. No independent study has 7 found Amazon Ring, one of See above See above See above NA See above See above the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates. Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV. Justice Department experiments have found "[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels. Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors." CCTV poses a threat to civil liberties Police had used camera networks to spy on "immigration protests" There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. And, cloud-based CCTV

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

Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions. Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie There are MANY effective tools the city could use to decrease community violence Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions suc

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

4 Washington a sanctuary state for those who are being impacted by violence in other states, putting all of us in danger.

I have an academic

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

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

surveillan

ce.

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

liberties. Do not

sell us out.

This is an

opportunity for

City leadership to

prove that you are

Please see the following links with more information and studies on the impact of CCTV: https://academicw orks.cuny.edu/cgi/v iewcontent.cgi?arti cle=1275&context=j j_pubs https://files.eric.ed. gov/fulltext/ED436 943.pdf https://www.404m edia.co/emailsreveal-the-casualsurveillancealliance-betweenice-and-localpolice/ https://www.thestr anger.com/news/2 025/05/02/800394 85/what-jamietompkins-saysreally-happened-atspd https://www.washi ngtonpost.com/wpsrv/local/longterm/l ibrary/dc/dcpolice/ stories/stowe25.ht https://www.bbc.c om/news/uknorthern-ireland-27887275 https://scitechdaily. com/whathappens-to-yourbrain-when-vouknow-youre-beingwatched/ https://www.bloom berg.com/news/arti cles/2011-12-27/when-policeabuse-surveillance-

cameras

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

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



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

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

There is little benefit, vs the social costs and toll on society of using it. Please consider that once in use, there is no turning back.
Conceptually, yes, but in reality, once it's in use, surveilling society become normalized.

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

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

It is being abused used at this point so NO!

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

- 1. CCTV will NOT reduce violent crime or aid in police investigations.
- * The only study SPD cites - a 40 year systematic review with meta-analysis of the efficacy of CCTV - concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop."
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7

- * No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates.
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- * Police had used camera networks to spy on "immigration protests"
- * There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy

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

Violence

interruptio n programs work.Neigh borhoods that have adopted a Cure Violence Model or Group Violence Interventio n Models have seen homicides and assaults decrease 30-50%. The city could scale effective community -led solutions

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which has

Restorative

Resolutions

Prevention

Gun

ers

None. in the current police state such as the Peacekeep

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

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

98

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

- * A cop in Texas has used a database of CCTV footage to search for someone that had an abortion. The cop was able to search CCTV footage from Washington State, other states with "sanctuary" laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare
- * SPD officer abused surveillance to stalk a "hot" SPD employee
- * The University of Hull Department of Social Policy looking into who CCTV camera operators focused on found "Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled..."
- * The University of Hull study also found "The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for 'no obvious reason' and on the basis of categorical suspicion alone."
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programs save money, research has shown every \$1 invested saves \$33.

Richmond, CA has chosen to invest in violence interruptio nand other community -led safety initiatives and they have seen a drop in the number of homicides. This is in contrast to neighborin g 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 investment Investment s restoring vacant land, the presence of street lighting, increasing

public

ion, and

transportat

community

non-profits

that tackle

violence

and build

being surveilled. community 3. Police control CCTV lead to camera, the cameras see reductions what the police want them to in both violent * Cameras have been crime and caught panning away from property police violence to avoid crimes. creating evidence of the police's actions. Maintainin * Police departments have g green been caught manipulating spaces has and "losing" CCTV footage. been One of the most notorious proven to instances was the Baltimore reduce violence. G Department repeatedly reen releasing manipulated spacesredu footage and "losing" footage cing related to the police killing of violence Freddie Gray. has been extensively researched. * Many communiti es across the country are making investment s in preventativ community -centered approaches and are seeing a reduction in crime and violence in the community * Violent crime can be reduced by investment s in mental health treatment, providing substanceabusetreatment facilities, and access to affordable housing. * Poverty and income inequality are associated

with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence. Opening libraries and expanding library hours both reduce violence and property crimes. Increasing access to healthcare decreases crime. Unfortunat ely, decreasing access to healthcare increases crime.

I urge you to prevent the use of CCTV for the following reasons:

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

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

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violence in

the Rainier

neighborho od by 33%.

which has

Restorative

Resolutions

Prevention

Gun

I see no value in using this technolog y. It will only do harm and is a waste of money.

More effective alternatives

Please stop the implementation of CCTV use in public. Make investments in communities that have been proven to get good results instead.

No CCTV in Seattle!

"immigration protests" There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. And, cloudbased CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with "sanctuary" laws, and nonpolice entities including the King County Housing

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Authority.

SPD officer abused surveillance to stalk a "hot" SPD employee

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two-and-a-half times more
likely to be surveilled..."

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

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

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

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

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

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

crime and property crime can be reduced hv community investment s. Investment s restoring vacant land, the presence of street lighting, increasing public transportat ion, and community non-profits that tackle

violence

violent

suspicious.

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

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

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

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

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

Maintainin g green spaces has been proven to reduce violence. Green spaces reducing violence has been extensively researched. Many communiti es across

the country are making investment s in preventativ community -centered approaches and are seeing a reduction in crime and violence in the community

Violent crime can be reduced by investment s in mental health treatment, providing substanceabusetreatment facilities, and access affordable housing. Poverty and income inequality

Unfortunat ely, decreasing access to healthcare increases crime.

associated with violence, especially assault and homicide. Inequality predicts homicides better than any other variable. Evidence supports that this is a causal link. And direct income support has been found to reduce firearm violence. Opening libraries and expanding library hours both reduce violence and property crimes. Increasing access to healthcare decreases crime.

CCTV, as it is currently being used and disseminated, seems fine, but an expansion to the "Cloud," making it accessible by ICE, etc, would be very detrimental for our civil liberties, especially at this wrought time when ICE is being used as a secret police by a president who doesn't respect the rule of law and

It an atrocity and must not be used. Government overreach

the Constitution.

is not something we voted for.

None no

The sanctity and privacy of each citizen.

It's a threat to our immigrant community and those exercising their reproductive rights, and the Washington State laws enacted to protect them.

Police have used camera networks to spy on "immigration protests." There is no way to stop ICE from accessing CCTV footage. And, cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with

King County Housing Authority. Police in Texas have used a database of CCTV footage to search (nationwide!) for someone who had an abortion. They were able to

"sanctuary" laws, and non-

police entities including the

search CCTV footage from Washington State, other states with "sanctuary" laws, and non-police entities including the King County Housing Authority for people seeking abortion healthcare

Research shows CCTV has "no significant effects on violent crime."The only study SPD cites a 40 vear systematic review with metaanalysis of the efficacy of CCTV concludes significant effects observed for violent crime" and "a body of research on the investigator y benefits of CCTV has vet to

We have systems in place that are safer for citizens that work well. And there are many other approach es, such as violence interrupti on programs, and investmen ts in housing and mental health programs, that we could take to solve

crime

problems

without

the risks

system

would

place on us:

this

develop

NONE.

Refer to the points and data on this well-researched page: https://stopsurveil lancecity.wordpre ss.com/closedcircuit-televisioncamerascctv/?utm_source =newsletter&utm medium=email& utm_term=2025-21&utm_campaig n=Protect+our+im migrant+communi ty+-+Stop+surveillanc e+expansion

I feel so strongly about this, that if my representative or a city-wide council member votes to support this, I will work very very hard to see that they do not keep their seat in the next election.

Why was there not more publicity about this to solicit community feedbacK?

I see the expansion of the cctv system as an unnecessary incursion into the privacy of the people of

would benefit people whatsoever. There is the additional risk of this data falling into the hands of ICE, where it may be used to

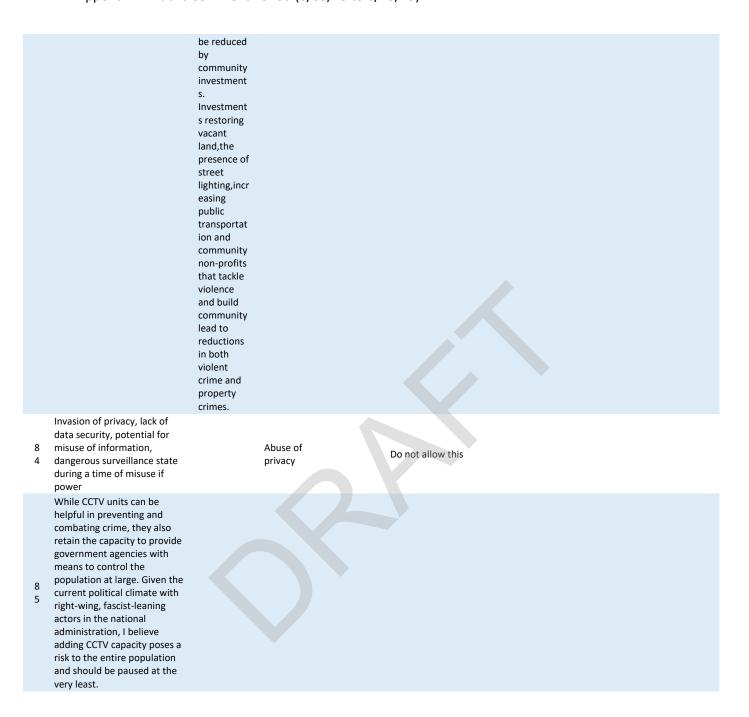
Seattle, I do not think it

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

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

Police control CCTV cameras, the cameras see what the police want them to see. Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions. Police departmen ts have been caught manipulati ng and "losing" **CCTV** footage. One of the most notorious instances was the Baltimore Police Deprtment repeatedly releasing manipulate d footage and "losing" footage related to

the police killing of Freddie Gray. Both violent crime and property crime can Consider the mental health harm caused to a person who knows he/she/they are being surveilled. People's brains act in a manner similar to "psychosis and social anxiety disorder" when they know they are being surveilled.



8 6	I do not want to live in a world of surveillance. There is no need to expand what already feels like over reach of people's right to privacy. All the cameras on people feels truly Orwellian. Do not add to it!	I suppose if a child or elderly person with dementia was 'last seen' by one of those cameras it could be useful, but what seems to be happenin g at this time feels sinister really. Targeting POC, LBGTQ folks feels facist.	Do not expand it. Use the funds you would use for this and put it toward affordable housing, food insecurity, health care, and/or education. There are so many things the city need right now, and more surveillance is not one of them!
8 7	it violates human rights	i'm sure there is value but not as it is being used	protect the people of seattle. FIGHT ICE. They are imprisoning innocent people and keeping them in barbaric conditions
8	Privacy. Government using information against the people. Enabling autocracy.	None.	Reduce use and access to military- like tools in everyday policing
8 9	Its use for surveillance of individuals based on their race, lifestyle or immigration status.	I do not see Wisdom in giving this data to ICE. Giving ICE data to pursue It will be individual difficult to s for restrict incarcerat access later on if intimidati desired. on or deportati on will increase the militarizat ion of our society and decrease	Do not allow ICE to have access to Seattles data.

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

n and

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

This is just a weak excuse to be able to throw our vulnerable populations in prison. Who knew that Seattle wanted to

be as

fascist as Florida and Trump?

erable ulations rison. None Hands off o knew our privacy Give us the CCTV footage of your closed door meetings in which you force out the only city leaders who care about their communities.

I am appalled that this technology is being marketed to me as something that will make our city safer. This is a thinly veiled attempt at turning Seattle into an even stronger surveillance state that seeks out, tracks, and punishes BIPOC, immigrants, the unhoused, and the LGBT community. This technology will do nothing but harm marginalized communities. This technology will be used to kidnap and brutally deport people. SPD is ineffective and incapable of protecting our community. I would be stupid to believe that this

technology would be used to

"protect and serve" anyone

conservative class who want nothing more than to stamp out any semblance of difference or diversity in our

but the wealthy, white,

community.

None

city is welcoming to all, yet entertain these fascist police-state technologies. I do not feel safe here anymore. And it's not because of the "crimes" committed by the unhoused, POC, immigrants etc... it is because of SPD and its brutality and insistence on tracking our movements.

You claim that this

These are not normal times.
Please do not increase
surveillance on everyone

Stored, searchable, sharable data collected for what-if situations can easily be used for nefarious purposes. This is not the time to potentially assist bad actors

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

9

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

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

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

None, **CCTV** cameras don't reduce crime or increase clearance rates. they don't even make people feel safer. This has been studies repeated. Lots of studies showing this were submitted just last year when SPD was first asking for these technolog ies (the

single

in the

SIR

original

showed

this). Not

going to

resubmit

all of the

studies

because

they were

submitted

just last

year

study SPD

included

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

by the Trump

ICE will impact

tourism?

Administration &

How do you think

any guardrails will

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

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

Being subjected to constant surveillance is harmful. Whose Streets Our Streets identified the level of surveillance in Seattle as already having "a psychological effect on the people being surveilled" (http://stopsurveillancecity.fil es.wordpress.com/2024/09/3 38c7-

wsosautomatedenforcement summary.pdf) and that was before SPD launched its CCTV & RTCC pilot. The effect is that people's brains act in a manner similar to "psychosis and social anxiety disorder" (https://scitechdaily.com/wh at-happens-to-your-brain-when-you-know-youre-being-watched/). Expanding surveillance will increase these impacts and make people less safe.

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

surveillance-during-2020-

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

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

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

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

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

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



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

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

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

			CCTV has not reduced violent crime.			
1 0 0	I oppose expansion of surveillance on Seattle people, particularly targeting queer and bipoc people. This data will help feds unlawfully kidnap people off the streets					
1 0 1	As the Federal Government lurches towards a politicized police state, NOW is not the time to increase police surveillance powers, especially if it will be shared with ICE.					
1 0 2	I oppose increased survalence of Seattle streets that would further enable the unconstitutional actions of Trump regime.	There are no protections for seattle citizen constitutio nal rights in this plan.	It's great to use to save endanger ed species.	Don't make the residents of Seattle an endangere d species.	Reread the the book 1984.	
1 0 3	It will be used to punish specific people and populations, such as people of color. It will impact privacy. It could be used to create databases of people for sexual and other crimes.		It could be used to solve crimes, but there doesn't seem to be a lot of evidence that it works for that purpose.			Right now the federal goverment is ignoring laws all over the country. We don't need to give them more tools.

I am deeply concerned about the expansion of CCTV in Seattle. First, there is no body of evidence suggesting that CCTV will reduce violent crime or aid in police investigations. SPD cites a single study in its justification; however the meta-analysis that SPD cites found no significant effects on violent crime and determined that there was no body of research on the benefits of CCTV. These findings are echoed by studies in the UK and Texas which found the technology did not reduce crime or improve public safety. Second, CCTV threatens our civil liberties. It is deeply vulnerable to misuse by individual authorities and ICE, leaving Seattle residents vulnerable, particularly immigrants, people of color, and people accessing abortion care. Given the lack of evidence and the threat to our civil liberties, this expansion would be a misuse of city funds.

I see absolutely no value in the use of this technolog Particularl y when our city is strapped for funds are there are evidencebased ways to reduce crime and improve safety. As a resident of Capitol Hill, I am deeply concerne d about the negative impact that the proposed CCTV expansion will have on our right to privacy and our civil liberties.

the many effective tools that exist to decrease community violence. For example, neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could also further invest in/expand models, such as the the Regional Peacekeepers Collective coordinated by the Regional Office of Gun Violence Prevention. The Restorative Resolutions project led by the Rainier Beach **Action Coalition** has reduced violence in the Rainier Beach neighborhood by 33%. There are promising evidence-based solutions that are cost-effective and present far better options for our

city!

City leadership should consider

Who has SPD consulted in their planned expansion of CCTV in Seattle?

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

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

1 0 9	I would request the city not expand its use of CCTV in public spaces. My concerns are related to the threat CCTV use could have for individual civil liberties. While CCTV use in private facilities, may reduce property crimes; widespread use in public areas has not been shown to reduce violent crimes. Constant monitoring of CCTV is impractical and expensive and liable to be biased, and should not be a substitute for more effective tools of community policing, violence interruption programs and preventive community-centered approaches to deal with the underlying causes of crime.

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

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

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

CCTV also poses a threat to civil liberties.

- 1 -The University of Hull 0
 - Department of Social Policy looking into who CCTV camera operators focused on found "Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled...". The study also found "The young, the male and the black were systematically and disproportionately targeted, not because of their involvement in crime or disorder, but for 'no obvious reason' and on the basis of categorical suspicion alone." -CCTV footage can be misused by ICE and there is no way to stop ICE from accessing it.

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

Not only is this an unnecessary invasion of privacy, targeted mostly at POC neighborhoods, but

- these data are being used by
- ICE to facilitate deportations and by states with gender affirming/abortion care bans to prosecute people. I totally

none at all

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

the world. Furthermore,

evidence transferred to

y cases that

have been

object to generating this sort of data. It will endanger privacy of not Do not use it targeted groups needed 2 The harmful impacts of surveillance and policing fall disproportionately on individuals who have already experienced I am against surveillance in violence from Seattle. I do not want police white supremacy or artificial intelligence and colonialism. systems to watch me and my This program is family as we go about our structurally racist. lives. Surveillance leads to self-censoring and a loss of 1 None City leaders individuality, creativity, and 3 should stop privacy. pursuing these police I do not want the federal technologies and government to legally or instead use the illegally access surveillance millions they data collected in Seattle. would cost on public-healthbased safety and community supports, like housing, food access, and libraries. "or until determined that all This evidence material to an information incident under investigation should not has been transferred to SPD's be secure transferred digital evidence lockers." is to or an exception wide enough to accessible drive a truck through. I by non-SPD understand the need to allow law extended investigation under enforceme extreme cases, but it still nt except in needs a hard limit or it will be specific abused with the best will in investigator

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

by an SPD liason as consistent with Seattle and Washingto n State priorities for enforceme nt. The individual sphere of liberty for Washingto nians outweighs the political interest of politicians a thousand miles away.

reviewed

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

None

It's useless and will inflict more harm than good. Who may have access to this footage? Will this assist in the mass kidnappings perpetrated by ICE? What is the root cause of crime in these areas and how can you address that instead of criminalizing humans?

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

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

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

1 1 6

1

WA state and Seattle

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 warrant.

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 ways that end up costing even more

money.

Negative value due to monetary cost for products, loss of civil liberties, liability issues, and other harms to our communit ies with no proven value to reduce

crime

that really do reduce crime that this money could go to Surveillance if it is truly makes us all less burning a safe and it is hard hole in the city's into the bag once metaphoric al pocket, normalized. although we all know there is a shortfall. What are

There are

programs

you even

thinking.

cannot afford this wasteful proposal
Surveillance and SPD has not shown that it can be trusted with to put the cat back into the bag once this sort of thing is normalized.

cannot afford this wasteful proposal and SPD has not shown that it can be trusted with what it already has. Seeking these kinds of solutions has proven to be a huge embarrassment in other cities where it has not worked.

Seattle and WA

I get that people want to feel safe, but this is an irresponsible use of funds that will not work, especially given that there is data supporting other effective solutions.

Additional surveillance and tracking of citizens incurs the very real risk that the data will be used at the local level to unfairly target traditionally oppressed segments of our population. Additionally, this data could be shared, willingly or unwillingly, with our increasingly authoritarian federal government to target immigrants and other people the administration wishes to silence or deport.

There is little or no demonstr ated value in increased CCTV surveillan ce.

Consider the very real likelihood that it will be abused at the expense of vulnerable populations.

1 1 8 1

CCTV will NOT reduce violent crime or aid in police investigations. The only study SPD cites - a 40 year systematic review with meta-analysis of the efficacy of CCTV – concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer. A study of Dallas, TX found "[CCTV] cameras are likely not cost-effective in terms of increasing clearances" due to any increases in clearance rates being mostly limited to thefts. Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved. No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates. Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV. Justice Department experiments have found "[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels. Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch multiple monitors." CCTV poses a threat to civil liberties Police had used camera networks to spy on "immigration protests" There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. And, cloud-based CCTV

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

Cameras have been caught panning away from police violence to avoid creating evidence of the police's actions. Police departments have been caught manipulating and "losing" CCTV footage. One of the most notorious instances was the Baltimore Police Department repeatedly releasing manipulated footage and "losing" footage related to the police killing of Freddie There are MANY effective tools the city could use to decrease community violence Violence interruption programs work. Neighborhoods that have adopted a Cure Violence Model or Group Violence Intervention Models have seen homicides and assaults decrease 30-50%. The city could scale effective community-led solutions suc

Violation of privacy, potential infringement of citizens' constitutional rights, weaponization of footage by an increasingly fascist federal government, increasing racial disparities in policing, and so many other harms are very likely to occur if this proceeds! I live near Garfield Highschool. Why must I be surveilled while just going about my daily life? When I visited China, I expected surveillance by the repressive communist regime there, and i thought about how grateful I was to live in the US, where a democratic government would never allow such blatant violation of citizens' privacy! How deeply embarrassing and upsetting that I was so very wrong. I do not support the use of these cameras in my neighborhood, and I definitely do not support expanding them to cover more and more of our city!

1

My concerns are MANY.

Absolutel y none. Anv supposed value for "fighting crime' just actually wastes more taxpayer money incarcerat ing people who in fact need housing. The need for fighting crime in our city could be made obsolete bγ funding affordable housing, addiction treatment services, and other solutions to the root causes of most

crime.

This

is

technology

absolutely

reprehensi

should not

be allowed

in our city!

ble and

your children and your neighbors, in administration has pass, and how you house with a mask Now imagine what this same thought undocumented, or

Please think about how you would feel with a camera following your every move, and every move of

vour own neighborhood. Now think about the Trump administration having access to that footage, and being able to use it for whatever purpose they see fit. Imagine next month or next year, if the Trump passed the antimask laws that they have threatened to could then be arrested for being seen on video leaving your own on while sick with COVID, simply trying to protect your neighbors from germs. experiment might feel like for one of your constituents who is who has dark skin and is therefore more vulnerable to being wrongly accused when facial recognition software is used. So many of your neighbors are much more vulnerable than you are, and you are putting them at risk if you allow surveillance cameras onto their porches and their driveways. Please, do not allow this

technology into my neighborhood! Your constituents do not want this!

|--|

CCTV cameras will further erode trust in the police system among people that live in those areas. Constantly feeling watched will stifle expression.

Whether increasing surveillance in public areas actually reduces crime, and is that reduction significant enough to offset the psychological impact on people living in those areas.

Vote against CCTV expansion as long as Trump is in office and ICE acts like this is a police state No RTCC expansion as long as Trump is in office and ICE and Homeland Security act like this is a police state.

In general it can have value but we must be very careful about privacy issues.

No

How our privacy has already been stolen by the Trump administration and DOGE.

An Al dystopia is what these technologies all seek to create -- CONTROL is an illusion, and a toxic one for governing bodies to try to enforce on the people who pay to create it. I don't want to live in a dystopian world.

2

I'm
certain
the hope
is that Al
can begin
to replace
people
and
policing -NO, just
NO.

Stop the push toward criminalizing the human responses to economic systems that seek to monetize us to death! Capitalism is killing us, and who is trying to put on the brakes??

We're not crazy because we don't want to be controlled. I'm law abiding and I don't want it.

SPD is an untrustwor thy partner, and has repeatedly broken the public trust. Whether The use of it's the DOJ this consent technolog decree y is a Take this political from the waste of moment seriously! Obama resources administrat that could The Trump ion (with be utilized administrationto benefit and ICE may gain some access to this aspects still public We should absolutely not in place), or safety. technology subject the public to this type their Public illegally, as the of surveillance technology, SPD has a proven demonstrat safety federal especially at a time when the track record of ed excesses would be government has being an use of force greatly committed to ignoring court orders and untrustworthy during the enhanced sending a more guardrails that would protect partner. The people 2020 militarized police by the public from inappropriate of Seattle do not providing George presence to use of this technology by ICE trust this Seattle. With the Floyd safe and technology in the or other government officials affordable blatant disregard protests hands of SPD. which housing, of court orders constitution in front of our resulted in access to and the payouts of food and constitution, our tens of free city should not be millions of mental developing this dollars, the health technology that public does resources. can so easily fall not and Give us into the wrong hands at this time. should not service trust the not SPD as a surveillan good faith ce. partner to use this technology without racially profiling, or invasive surveillance

1 2 Trump administration is

who are disregarding the

1

eyes.

I want leadership to consider what is currently happening in our country, and the way that ICE is kidnapping people, ripping apart families, and Any value terrorizing it could immigrants and potentiall black and brown y have people. This must be I believe that the federal administration is evaluated government will seek any aggressively against existing tool to harm attacking the the harm immigrants, their political rights of trans it will 1 opponents, and people people and queer I beg you all to protect the cause. seeking abortion and gender people. It is people of Seattle by NOT And I care. I am DEEPLY concerned working to further implementing this. believe it about furthering the ability of erode will be this administration to target reproductive weaponiz vulnerable and oppressed rights. It is sending ed against communities. the Marines and our most National Guard to vulnerabl suppress peaceful protest against communit the wish of state ies. leaders. There are legitimate claims of the US being on the brink of becoming a dictatorship. This is NOT the time in history to increase surveillance. Surveillance creates fear. Privacy is a fundamental 2 right. CCTV is an incursion I don't want it. into innocent peoples lives. Don't extend it. I'm very concerned that information from our license understan Please consider plates will be uploaded to a d that this the importance in national database, which will technolog 1 these rife times of be available to ICE, Border y will add 2 maintaining our Control, etc..... This will another status as a endanger many in our tool in sanctuary state marginalized communities your 'tool and city. (e.g., immigrants, trans folks, belt' to women). Is it not illegal in fight

Washington State for the police to cooperate with immigration enforcement? This seems to be a back door way to do so.

crime.
However,
the risks
of joint a
national
surveillan
ce system
far
outweigh
the
benefits.

none

I'm extremely concerned with the proposal to expand the use of CCTV cameras used by SPD. Citizens have a right to privacy and being constantly surveilled will grow tensions between the public and SPD. Federal departments such as ICE have already used CCTV footage in other states to track and detain immigrants, and I believe that it is the city's responsibility to maintain itself as a sanctuary city and not allow for this expansion.

The increase in surveillance will no doubt lead to a disproporti onate amount of arrests of marginalize d groups in

Seattle

Consider divesting funds from SPD to use for essential services such as housing and public schools.

Lead from your

ideals, not your

true freedom is

the most

our elected

leaders at the

fears. Standing up

to fascism and for

important work of

100% surveillance 24/7 does not make for a free society. "1984" was a cautionary tale, not a manual for how to govern a society. Increased CCTV does not keep citizens more safe, it just makes us less free.

I think the risk far outweight the value.

The City of Seattle leadership should think about how to protect its citizens from federal government overreach.

Why is the U-District not listed as a neighborhood? It has nearly as many residents as Capitol Hill.

Major concerns. Mass surveillance, especially if the data gets into the hands of unaccountable and lawless government actors, is the antithesis to a free and democratic society. Right now the federal government is outright violating court orders and threatening to send citizens to overseas prisons without due process. These cameras will help facilitate the human rights abuses of innocent

individuals and people who should have a day in court to defend themselves.

3

3

134

I am concerned about the threat that this expansion of CCTV use will pose to civil liberties, without any accompanying improvement in crime clearance rates. CCTV networks using cloudbased storage have been 1 abused by ICE seeking to 3 search national databases of CCTV footage, including in our sanctuary city (https://www.404media.co/ic e-taps-into-nationwide-aienabled-camera-networkdata-shows/), police forces in states that have criminalized abortion, and lawful protests.

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

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

1 3 5

3

7

1

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

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

Right

now.

none.

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

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

techno-fascism

Imagine

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



liberties Police had used camera networks to spy on "immigration protests" There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. 1 And, cloud-based CCTV 3 storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State, other states with "sanctuary" laws, and nonpolice entities including the King County Housing Authority.

CCTV poses a threat to civil

CCTV will NOT reduce violent crime or aid in police investigatio ns. The only study SPD cites a 40 year systematic review with metaanalysis of the efficacy of CCTV concludes "no significant effects observed for violent crime" and "a body of research on the investigator y benefits of CCTV has yet to develop."

DO NOT DO SPEND None **DOLLARS** whatsoev ON THIS er. GY.

TAXPAYER

Stop. Full stop. TECHNOLO

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

I do not want this to be used

No need for increased

surveillance

None

Not to be used against the people

N/a

N/a

I disagree with the digital surveillance methods because they create a mass amount of data about citizens that can be misused. Technology fails, horrible things could happen to someone on accident because the tech is inaccurate. Even more, I do not wish to live in a 4 surveillance state where my moves as a member of the 1 public are consistently tracked and entered into some database that I could never get into. It is an unnecessary waste of resources that could go into something more useful for citizens daily lives, like sidewalks, parks, or more transit connections.

I do not see any value in a stockpile of data people that can be hijacked, misused to target individual s without due process, generally using city resources for some unseen benefit to the people it

Technology is not without the bias of people who have access to it. Implementing this sort of system will ultimately affect people who have less access to private space, such as our unhoused neighbors, and it is our responsibility to treat all those we

share a city with

as equal

inhabitants.

shown ineffective in stopping violent crimes. It does, however, pose a threat to civil liberties. There is also evidence that the police will not use CCTV footage judicially - posing the camera away from their own crimes. I do not support SPD providing anymore information to ICE about our neighbors, who are being disappeared from our cities.

Expanding this has been

I do not think we should live in a world of constant surveillan ce. Giving more to the police is not ideal.

affecting.

Think about our large immigrant population and how damaging this could be. They are here legally, paying taxes, supporting our local economy. We do not want them disappeared with the help of SPD.

Please carefully consider any unintended negative consequences of adding cameras to selected

- 1 communities. Evidence
- 4 indicates that CCTV poses a
- threat to civil liberties at a time when these liberties are threatened. If so - now is not the time to make this change!

Loss of transparency from

1

4 Lack of training in how to use this new technology

This technolog y could help in solving a crime but hopefully not using

a crime to

solve a crime!

The value

is to the

current

federal

governme

democrati

intentions

. While it

may have

small use

in local

traffic

safety,

this.

the risk to

privacy far

outweighs

some

nt's non-

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

concerns include allowing bounty hunters and ICE agents to track immigrants , abortion seekers, and likely seekers of gender affirming care, or anyone else targeted by currently hard right, fascisminclined federal

governmen

Specific

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

issue).

As a fifth

I object to a surveillance state

4

None

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

7

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

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

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



CCTV will NOT reduce violent crime or aid in police investigations. The only study SPD cites - a 40 year systematic review with metaanalysis of the efficacy of CCTV - concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." A study for the British Home Office examining 14 CCTV systems across the country similarly found that the cameras did not reduce crime or make people feel safer. A study of Dallas, TX found "[CCTV] cameras are likely not cost-effective in terms of increasing clearances" due to any increases in clearance rates being mostly limited to thefts. Research into burglaries in Thames Valley, UK found preserved video from CCTV cameras had no impact on whether or not burglaries were solved. No independent study has found Amazon Ring, one of the largest networks of CCTV cameras in the country, to have any impact on crime or clearance rates. Having a person constantly watch video from CCTV cameras will not magically improve outcomes of CCTV. Justice Department experiments have found "[a]fter only 20 minutes of watching and evaluating monitor screens, the attention of most individuals has degenerated to well below acceptable levels. Monitoring video screens is both boring and mesmerizing... This is particularly true if a staff member is asked to watch

CCTV poses a threat to civil liberties. Police have used camera networks to spy on "immigration protests."
There is no way to stop ICE from accessing CCTV footage. Local police departments are very cozy with ICE casually sharing surveillance data. And, cloud-based CCTV storage means ICE is able to search nationwide databases

multiple monitors."

These cameras will target the LGBTQIA+ community

immigrants , and BIPOC Youth, the same people the Trump Administrat ion is targeting. SPD asked for this expansion 3 weeks after their CCTV and RTCC cameras went live on May 20, showing SPD never intended for this surveillance to be a short-term "pilot." SPD confirmed to Guy Oron that they have been providing

"mutual

ICE/Depart

Homeland

aid" to

ment of

Security.

Some of

"mutual

occurred

this

aid"

while

Shon

Interim

Police Chief

Barnes was

making the

headline

grabbing

claim that

he expects

to go to jail

because he

won't

None. I see no value in use of this technolog y. (CSWG)'s report on Closed Caption Television (CCTV) cameras and Real-Time Crime Center (RTCC) stated that "[a] majority of the working group is unsupportive of any pilot deployment of these two technologies [CCTV and RTCC]" due to "[t]he amount and urgency of the concerns and outstanding questions." The CSWG's role is to "[p]rovide to the Executive and the City Council a privacy and civil liberties impact assessment for each departmental request for surveillance technology acquisition or inuse approval." City leadership should not ignore the recommendations of the group responsible for assessing privacy, civil rights, and disparate impacts recommend for CCTV & RTCC.

The Community

Working Group

Surveillance

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

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

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

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

surveillance

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

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

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



Most immigrants and LGBTQ+ I only see people are innocent I do not hardworkin citizens want my g people I am worried about my having Please do not actions to that just their adopt it. privacy want to live be privacy surveilled. their lives. taken This techn away ologly will wrongly target them.

My concern is that CCTV does not actually reduce crime and that I puts marginalized groups at risk. A 40 year systematic review with metaanalysis of the efficacy of CCTV – concludes "no significant effects observed for violent crime" and "a body of research on the investigatory benefits of CCTV has yet to develop." The threat to civil liberties that CCTV will have is not worth it. There's no way to prevent cops from handing footage over to ICE which would put immigrants at further risk. Cloud-based CCTV storage means ICE is able to search nationwide databases of CCTV footage including footage from police departments in Washington State. The University of Hull Department of Social Policy

looking into who CCTV camera operators focused on found "Black people were between one-and-a-half to two-and-a-half times more likely to be surveilled..." So BIPOC communities will also be put at more risk. The danger CCTV poses to these communities is not worth that zero benefits they will have since they don't actually

reduce crime.

1

0

This technology will provide no benefit to people. What would have an actual impact on reducing crime would be to provide better social services to people who need them.

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

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

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

1

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

None. They do not prevent crime. Budget: This is not sensible. If you approve this program as permanent and fund it, you say you care more about a police surveillance program than sidewalks, parks, fire fighters, schools, libraries, etc.

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

I see no value whatsoev er. We don't need flashy gadgets that have been proven to be ineffective at promoting a truly safe place for people to live. We know what increases safety: access to shelter, food, services, and education.

This would play into the Trump Administration's plans to surveil everyone and disappear political enemies. It would further degrade our civil liberties. That more surveillance will lead to the further over policing of communities that have already suffered from over policing. That these recordings will be shared with ICE and other federal law enforcement that seek to target our city. And that it will lead to mistrust of the citizens of this city of their police force in a critical time where our relationship needs to be mended. This is not the way to mend that relationship.

1

I do not think this is the time to be instituting this technolog y. In fact I'm begging you to rethink this. this. I have lived in this city my whole life and worked in gun violence prevention work. This will not help us fight crime. This just adds to us being surveilled. Given what is happening in the world right now and the way the Federal government is ignoring and plowing over states rights and city rights I don't believe what would be captured on these recording would

Please do not do

This is a moment to make a good decision and not move towards more surveillance which will lead to more distrust from your citizens.

civil liberties, especially our first amendment right of free speech, public protest, and public assembly. CCTV also harms by aiding in criminalizing people seeking abortions and genderaffirming healthcare. CCTV is a threat to women and survivors of sexual assault and stalking. CCTV harms immigrants by giving information directly to ICE, directly supporting the kidnapping of immigrants with no due process. Police control of CCTV cameras leads to censorship and selective punishment. CCTV creates a system ripe for abuse and potential to violate all of our First and Fourth Amendment Rights. We should not expand CCTV!

CCTV poses a threat to our

I do not see any value in this technolog y. Real safety comes from communit y care, equitable access to resources, stable housing, food security, childcare, education , and jobs that pay a living wage.

No

I want City leadership to deeply examine the questions, "What is safety? Do I want safety for everyone?"

be secure.

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.

It makes logistically possible the worst forms of authoritarianism as soon as the politics shift as they easily can and have already begun to do so, AND it makes more efficient (and thus easier and 1 more likely) attempts to enforce bad policy that 5 focuses on punishment rather than on compensating victims with progressive revenue and providing services to the people who make up the economic and social underclass

None, unless you count somethin g for politicians to brag about and pretend to have done somethin g good rather than what it actually is - worse

than nothing

Immigration and Customs Enforcement gestapo deportations, the It's criminalization of negative abortion and trans value healthcare, etc, because of AND the utter the money failure of carceral wasted responses to even the crimes (safety related or not) that Seattle does have, AND the ease at which this

can be hacked

The national

politics of

Don't use it any of it. Remove the surveillance technology you alreay have.

It's not complicated. Just make a serious attempt at implementing progressive policy for once.

Trump and people like him can use it for all sorts of ills, also it puts us further down the road to wasting police time and court resources and jail resources on things that don't work rather than the services and victim-compensation that we know do.

to ignore the obvious and only answer. Punishmen t doesn't prevent crime. (Might work on white collar crime like wage theft). Ending poverty does. Progressive None taxation will force the tech elite to decide whether to pay for the consequen ces of the problems they've caused or partially leave and stop causing

those problems

It's a way

It is too easy to be abused by governmen ts, it is too easy to be used "lawfully" but unethically to waste money traumatizin g people without improving constituent s lives, and it is too easy to hack because if it exists it eventually

be hacked

Don't

Your fake performative politics will not protect you everyone can see that Seattle's problems are not being solved. Only progressive policy will actually be effective

Do not waste our money on this dangerous unhelpful crap.

1 5 6 This technology won't reduce crime and is ripe for abuse.

1 5 7

None

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





2025 Surveillance Impact Report Executive Overview

Closed-Circuit Television Camera Systems

Seattle Police Department



Overview

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

1.0 Technology Description

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

2.0 Purpose

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

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

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

3.0 Data Collection and Use

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



storage, unless used as evidence for a criminal investigation.

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

4.0 Data Minimization & Retention

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

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

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

5.0 Access & Security

Access

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

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

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

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

Security

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



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

6.0 Data Sharing and Accuracy

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

Data may be made available to requesters pursuant to the Washington Public Records Act, <u>Chapter 42.56 RCW</u> ("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 (<u>RCW 10.97.030</u>, <u>SPD Policy 12.050</u>). Individuals can access their own information by submitting a public disclosure request.

Per <u>SPD Policy 12.080</u>, the Crime Records Unit is responsible for receiving, recording, and responding to requests "for General Offense Reports from other City departments and from other law enforcement agencies, as well as from insurance companies.

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

SPD shares data with authorized researchers pursuant to properly execute research and confidentiality agreements as provide by <u>SPD Policy 12.055</u>. This sharing may include discrete pieces of data related to specific investigative files collected by the devices.

7.0 Equity Concerns

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

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



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

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



SUMMARY and FISCAL NOTE

Department:	Dept. Contact:	CBO Contact:
Seattle Police Department	Nick Zajchowski	Geoffrey Detweiler

1. BILL SUMMARY

Legislation Title:

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

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

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

2. CAPITAL IMPROVEMENT PROGRAM	
Does this legislation create, fund, or amend a CIP Project?	☐ Yes ⊠ No
3. SUMMARY OF FINANCIAL IMPLICATIONS	
Does this legislation have financial impacts to the City?	⊠ Yes □ No
3.d. Other Impacts	

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

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

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

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

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

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

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

N/A

4. OTHER IMPLICATIONS

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

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

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

- ii. Please attach any Racial Equity Toolkits or other racial equity analyses in the development and/or assessment of the legislation. $\rm N\!/\!A$
- iii. What is the Language Access Plan for any communications to the public?

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

e. Climate Change Implications

- Emissions: How is this legislation likely to increase or decrease carbon emissions in a material way? Please attach any studies or other materials that were used to inform this response.
 No.
- ii. Resiliency: Will the action(s) proposed by this legislation increase or decrease Seattle's resiliency (or ability to adapt) to climate change in a material way? If so, explain. If it is likely to decrease resiliency in a material way, describe what will or could be done to mitigate the effects.

 No.
- f. If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s)? What mechanisms will be used to measure progress towards meeting those goals?

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

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

No.

5. ATTACHMENTS

Summary Attachments: None.