

CITY OF SEATTLE

ORDINANCE 127236

COUNCIL BILL 120994

..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 Tracking Devices; and ratifying and confirming certain prior acts.

..body

WHEREAS, on February 28, 2023, the City Council passed Ordinance 126776, adopting the original Surveillance Impact Report (SIR) for Tracking Devices technology; and

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

WHEREAS, the functionality defined in the original tracking devices SIR will change pending a \$250,000 Washington State Department of Commerce Law Enforcement Pursuit Technology grant that will assist local law enforcement in vehicle pursuit mitigation; and

WHEREAS, a category of GPS trackers (police pursuit management technology) is utilized to tag and track fleeing vehicles as a safer alternative to vehicle pursuits; and

WHEREAS, in accordance with RCW 10.116.060.2.d, which requires agencies to “develop a plan to end the pursuit through the use of available pursuit intervention options,” this specialized GPS tracker allows the Seattle Police Department (SPD) to track the precise location of a vehicle for which probable cause or reasonable suspicion of involvement in a crime has been established and accomplish the task of recovery or arrest without the need for initiating or continuing a vehicle pursuit; and

1 WHEREAS, SPD is considering a pilot for 25 SPD patrol vehicles to be equipped with GPS
2 tracker launchers, deployed throughout the patrol operations bureau precincts; and

3 WHEREAS, all sworn SPD officers will be trained in the use of pursuit mitigation GPS trackers,
4 ensuring compliance with recent state law updates regarding pursuit mitigation; and

5 WHEREAS, pursuit mitigation GPS trackers will be monitored by the Real Time Crime Center
6 and information will be relayed to patrol units in the field; and

7 WHEREAS, no changes will be made to the previously approved requirements related to covert
8 tracking systems; NOW, THEREFORE,

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

10 Section 1. Pursuant to Ordinances 125376 and 125679, the City Council approves use of
11 the Seattle Police Department's Tracking Devices and accepts the updated 2025 Surveillance
12 Impact Report for this technology, attached to this ordinance as Attachment 1, and the Executive
13 Overview for the same technology, attached to this ordinance as Attachment 2.

14 Section 2. Any act consistent with the authority of this ordinance taken after its passage
15 and prior to its effective date is ratified and confirmed.

1 Section 3. 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 17th day of June, 2025,
4 and signed by me in open session in authentication of its passage this 17th day of
5 June, 2025.

6 

7 President _____ of the City Council

8 Approved / returned unsigned / vetoed this 23rd day of June, 2025.

9 

10 Bruce A. Harrell, Mayor

11 Filed by me this 23rd day of June, 2025.

12 

13 Scheereen Dedman, City Clerk

14 (Seal)

15 Attachments:

16 Attachment 1 – 2025 Surveillance Impact Report: Tracking Devices

17 Attachment 2 – 2025 Surveillance Impact Report Executive Overview: Tracking Devices

2025 Surveillance Impact Report

Tracking Devices

Seattle Police Department

Surveillance Impact Report Versions:

- 2022 Surveillance Impact Report: Seattle Police Department Tracking Devices adopted by [Ordinance 126776](#) on 2/28/2023.
- 2025 Surveillance Impact Report: Seattle Police Department Tracking Devices

Surveillance Impact Report (“SIR”) overview

About the Surveillance Ordinance

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

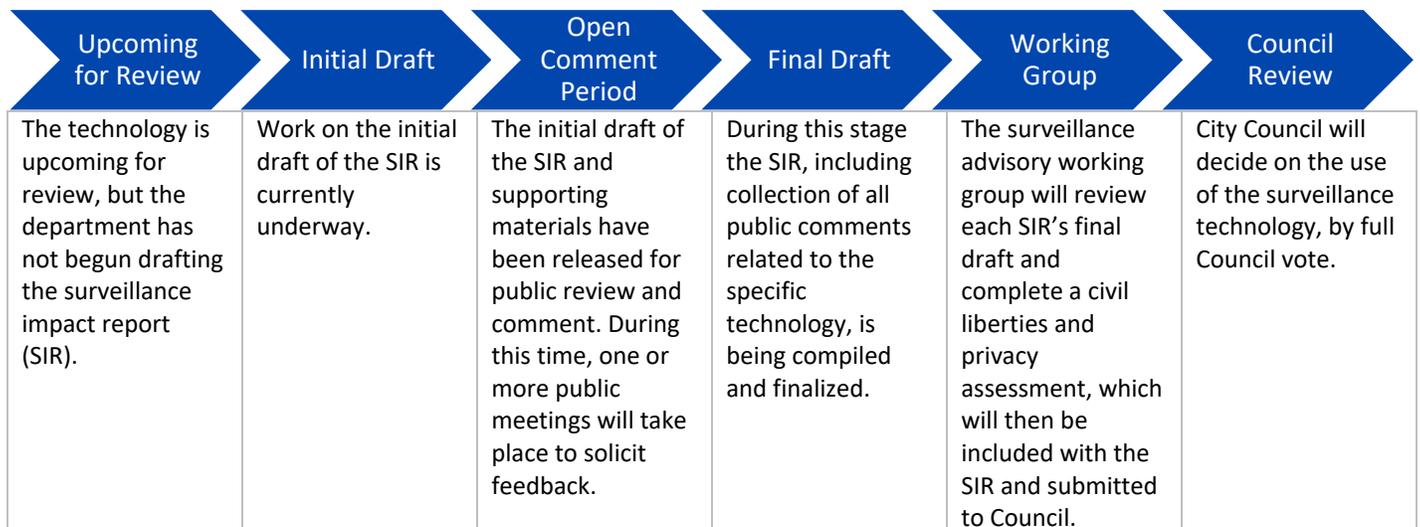
How this Document is Completed

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

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

Surveillance Ordinance Review Process

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



Privacy Impact Assessment

Purpose

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

When is a Privacy Impact Assessment Required?

A PIA may be required in two circumstances.

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

1.0 Abstract

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

Seattle Police Department (SPD) utilizes geolocation trackers to track and locate vehicle information during criminal investigations. Geolocation trackers are devices that SPD utilizes as a tool to locate and track the movements and locations of vehicles. Covert trackers are utilized only after obtaining legal authority via a court order or consent, and once the consent or terms of the order have expired all data collected is maintained only in the investigation file.

A category of GPS trackers (police pursuit management technology) are utilized to tag and track fleeing vehicles as a safer alternative to vehicle pursuits. In accordance with RCW 10.116.060.2.d, which requires agencies to “develop a plan to end the pursuit through the use of available pursuit intervention options,” This specialized GPS tracker allows SPD to track the precise location of a vehicle for which probable cause or reasonable suspicion of involvement in a crime has been established and accomplish the task of recovery or arrest without the need for initiating or continuing a vehicle pursuit.

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

Tracker technology directly tracks and collects location information of vehicles and indirectly tracks and collects the same information about individuals. Despite the requirement that covert trackers be utilized only pursuant to a search warrant or with consent, this could raise potential privacy concerns, such as general surveillance or tracking of the general public.

GPS pursuit mitigation trackers also directly track and collect location information of vehicles and, indirectly, their occupants. While this technology is limited by policy to vehicles for which there is reasonable suspicion or probable cause, they could raise potential privacy concerns, such as general surveillance or tracking of the general public.

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.

Trackers allow SPD to remotely track vehicles electronically and to locate vehicles and individuals that are sought in connection with an active criminal investigation. They are utilized in these cases with the consent of a witness, a confidential informant, or within the scope of a judicially issued search warrant. They may also be used as a police pursuit management tool, where they can provide a critical alternative to high-speed pursuits that can endanger the safety of both residents and police personnel. Without this technology, SPD would be unable to collect important evidence in some criminal investigations and subject community members to the dangers of high speed pursuit situations.

2.2 Provide any data or research demonstrating anticipated benefits.

The primary benefit of the covert tracking systems is in the gathering of evidence used in the resolution of criminal investigations. Proper gathering of location evidence of criminal activity by the police supports SPD’s mission to prevent crime, enforce the law, and support quality public safety. “The value of employing electronic surveillance in the investigation of some forms of serious crime, in particular organized crime, is unquestionable. It allows the gathering of information unattainable through other means.”¹

In the case of the United States vs. Katzin, the U.S. Court of Appeals ruled law enforcement officials are allowed to use location tracking devices to trace a suspect’s vehicle and monitor their activity once a warrant is properly obtained—which prevents law enforcement from trampling on a person’s Fourth Amendment rights that protect them from “unreasonable searches and seizures.”²

GPS pursuit mitigation tracking devices also offer an alternative to the need for vehicular pursuit of suspect vehicles. This only occurs when an officer has the equivalent of probable cause or reasonable suspicion of wrongdoing (including fleeing temporary detention like a traffic stop) and the apprehension of the fleeing suspect is needed but the danger of a pursuit is not reasonable. The device is then removed, and the location tracking ends at the point at which police detain the suspect vehicle. The vehicle-mounted GPS launcher has the ability to tag, track, and locate without compromising officer and community safety. The Police Executive Research Forum (PERF) recently conducted a study that showed that, “when properly deployed, (it) had a positive impact on the pursuit outcome for apprehensions.”³

¹ https://www.unodc.org/documents/organized-crime/Law-Enforcement/Electronic_surveillance.pdf

² <https://info.rastrac.com/blog/police-gps-tracking>

³ <https://www.ojp.gov/pdffiles1/nij/grants/250549.pdf>

2.3 Describe the technology involved.

Covert tracking technology consists of interconnected hardware and software. The hardware, a real-time tracking and data logger, is a compact unit that adheres to or rides along with a targeted vehicle. These trackers are location tracking devices that report latitude and longitude coordinates on a pre-determined schedule that can be adjusted by users remotely. The hardware also logs high temperature alerts, low battery alerts, device removal, power/shut down alerts and battery level. The software consists of an online portal that collects the information captured by the hardware, and allows for graphic representation of that information, including mapping of locations and movement, alerts for established events (i.e., a vehicle has moved beyond an established boundary, etc.), and scheduling of “check-ins” (the reporting interval records the locations set in seconds, minutes or hours).

The data captured by a device is downloaded out of the online portal after the conclusion of a tracking schedule (due to the expiration of a search warrant or an investigation) and is provided to the Officer/Detective leading the investigation. The data is then purged from the software and the hardware is reset for future deployment, meaning no data captured is stored in any location other than the investigation file. This is in keeping with Washington State Retention Schedule for Records Documented as Part of More Formalized Records ([GS2016-009](#)). It requires that such records be retained “until verification of successful conversion/keying/transcription then destroy.”

In the beginning of 2020, cellular providers in the USA announced that the existing 3G cell networks would be decommissioned in 2022 as the newer 5G networks were phased in. Many of the existing SPD tracking devices were tied to the older 3G network and have been or will need to be replaced with similar-functioning updated 5G versions of the same location tracking technology.

In the case of GPS pursuit mitigation trackers, the GPS launcher deploys a GPS tracking tag onto a suspect vehicle. Once the GPS tag is attached to the vehicle, it communicates positional data to a mapping platform in real time. Law enforcement can then plan and coordinate an informed tactical response to make a safe arrest while maintaining community and officer safety. It is important to note that the GPS tag has a limited battery life (approximately 8 hours), preventing the possibility of long-term surveillance.

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

Utilizing location tracking devices to locate vehicles in pursuit of an investigation helps SPD to mitigate serious and/or violent criminal activity and reduce crime.

GPS pursuit mitigation trackers allow SPD to effect the arrest of fleeing suspects in vehicles without the need for vehicle pursuits that can place the public, the suspect, and officers, in danger.

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

Maintenance and utilization of covert vehicle trackers is managed by the Technical and Electronic Support Unit (TESU).

For deployment of location covert trackers for investigations by TESU, the requesting Officer/Detective completes requests for deployment (including a Request Form that must be completed, which includes the active search warrant number). A TESU supervisor then approves the request before a tracking device is assigned and deployed to an investigating Officer/Detective. All requests are filed with TESU and maintained within the unit, available for audit.

The hardware and software for GPS pursuit mitigation tracking systems are managed by the RTCC and deployed on police vehicles and via handheld launchers. Individual deployment of the GPS tracking units is determined by the police officer involved in determining probable cause or reasonable suspicion for the stop of a vehicle.

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.

Each application of covert tracking technology is screened by the TESU supervisor and held to a legal standard of consent or court issued search warrant. The process is as follows: one member of the Unit is tasked with receiving requests for deployment (including a Request Form that must be completed by the requesting Officer/Detective, which includes the active search warrant number). A TESU supervisor then approves the request before a tracking device is assigned and deployed to an investigating Officer/Detective. All requests are filed with TESU and maintained within the unit, available for audit.

Prior to deployment of GPS pursuit mitigation trackers, officers must establish reasonable suspicion or probable cause for the stop of a vehicle. At that point, officers will have the discretion to deploy the GPS pursuit mitigation trackers if it appears the vehicle may flee. Additionally, if an officer engages in a pursuit with a vehicle, they can deploy a tracker and terminate the pursuit, relying on the tracker to follow the vehicle.

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

Covert tracking devices are only utilized with express consent or search warrant authority. SPD must comply with all legal requirements for securing consent or a search warrant (see [US v. Jones](#) and [State v. Jackson](#)).

GPS pursuit mitigation trackers are only deployed when an officer has established reasonable suspicion or probable cause for the stop of a vehicle, the same standard as established by RCW 10.116.060.

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.

Unit supervisors are responsible for screening all deployments as well as ensuring that staff receive adequate training specific to the involved technologies.

TESU personnel are trained by the vendor in the use of the hardware and software. When an Officer/Detective requests and deploys a tracking device from TESU, TESU personnel train the Officer/Detective in the tracker's use.

If the geolocation tracking device is being utilized pursuant to a search warrant, the warrant dictates the scope and parameters of the information collected.

[SPD Policy 6.060](#) requires that "information will be gathered and recorded in a manner that does not unreasonably infringe upon: individual rights, liberties, and freedoms guaranteed by the Constitution of the United States and the State of Washington, including freedom of speech, press, association, and assembly; liberty of conscience; the exercise of religion; the right to petition government for redress of grievances; and the right to privacy."

Officers are required to be trained in the policies and use of GPS pursuit mitigation trackers prior to deploying the equipment. Officers are trained by the Education and Training Section using training developed by SPD in collaboration with the technology vendors. Use of GPS pursuit mitigation trackers is monitored using the vendor software, as well as integrations to the Real Time Crime Center, and documented in police reports stored and maintained in the SPD RMS. Use of GPS pursuit mitigation trackers are reported via radio as soon as feasible and use acknowledged by an SPD supervisor.

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.

Officers/Detectives obtain search warrants or consent to deploy vehicle tracking devices. The information is gathered consistent with [SPD Policy 6.060](#), such that it does not reasonably infringe upon “individual rights, liberties, and freedoms guaranteed by the Constitution of the United States and the State of Washington, including freedom of speech, press, association, and assembly; liberty of conscience the exercise of religion; the right to petition government for redress of grievances; and the right to privacy.”

Vehicle tracking data is temporarily stored by third-party vendors (as described in 2.3 above), until the schedule for collection of data has expired (per the search warrant or consent authorities), at which time all data collected is downloaded and attached to the investigation file. This is in keeping with the [Washington State Local Government Common Records Retention Schedule](#) Disposition Authority Number GS2016-009 Rev. 0, governing retention of records documented as part of more formalized records, and requiring that SPD “retain until verification of successful conversion/keying/transcription, then destroy.”

The only data collected by the GPS pursuit mitigation tracker is date, time, location (to include latitude/longitude), remaining battery life, the speed of the tag when moving, all of which is retrieved from the tracker itself. No other data is pulled in by GPS pursuit mitigation trackers.

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

Equipment deployment is constrained to the conditions stipulated by the consent or court order providing the legal authority. All deployments of tracking technology are documented and subject to audit by the Office of Inspector General and Federal Monitor at any time.

Data collected is provided to the case Detective for the investigation and no data is retained by the Technical and Electronic Support Unit.

The GPS pursuit mitigation tracker is applied to the vehicle in question by aiming with the launcher. No other information about the vehicle is collected. If a vehicle is inadvertently tagged, the tracker will be retrieved as quickly as possible and deactivated by the officer. Such deployments will be documented.

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?

Officers/Detectives will provide written consent and/or a court approved warrant for covert vehicle tracking technology deployments, via the Request Form process. The Technical and Electronic Support Unit Supervisor will screen all tracking technology deployments to ensure that the appropriate authorities are in place before approving deployment of tracking technology.

Officers who have established probable cause or reasonable suspicion to stop a vehicle are able to deploy GPS pursuit mitigation trackers. Use of GPS pursuit mitigation trackers are reported via radio as soon as feasible and use acknowledged by an SPD supervisor.

4.4 How often will the technology be in operation?

Trackers are used, as appropriate, when supported by a search warrant or consent (of a witness or a confidential informant), in conjunction with an active investigation, or when use of GPS pursuit mitigation trackers is needed to prevent the need for the pursuit of a vehicle for which there is probable cause or reasonable suspicion to stop. The length of time that any one covert tracker might be utilized in an investigation is established, and constrained, by parameters established within the requisite search warrant. The battery of a GPS pursuit mitigation tracker is about eight (8) hours.

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

Temporary.

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?

Physical objects involved in covert tracking deployments are unmarked as their purpose is in support of covert investigations.

GPS pursuit mitigation trackers are visible, as they are normally launched to attach to the rear of a vehicle, in plain view of the public. It is marked with a 10-digit serial number and barcode.

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

Only authorized SPD users can access the vehicle tracking devices or the data while it resides in the system. Access to the vehicle tracking systems/technology is specific to system and password-protected.

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

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

Data collected by the deployment of a GPS pursuit mitigation tracker is used by SPD personnel to track and locate vehicles for which there is probable cause or reasonable suspicions. These personnel may be patrol, investigations, or RTCC staff capable of broadcasting tracking information to responding units. OIG personnel will also have access for audit purposes.

Information regarding the track is included in police reports stored in the SPD RMS.

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

No entity, other than SPD personnel, utilize vehicle tracking technology. OIG personnel will have access for oversight requirements.

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

To deploy and utilize vehicle trackers, Officers/Detectives must submit a request form that requires proof of consent or search warrant, and active investigation, as evidenced by a GO number. After the scheduled parameters for collection of data expire, data is downloaded from the supporting software, and included in the investigation file. At that point, only SPD personnel involved in the investigation have access to this information.

When an officer has established probable cause or reasonable suspicion for a vehicle, the threshold for deployment and use of GPS pursuit mitigation trackers will have been met.

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.)?

Only Technical and Electronic Support Unit personnel have access to vehicle tracking equipment and services. Deployment of vehicle trackers follows a specific process (see 2.5 above) that requires consent or search warrant documentation. Access to data is documented with TESU and is made available to any auditing authority.

Only personnel with approved accounts in the GPS pursuit mitigation tracking system will have access to the data. The GPS pursuit mitigation tracking system and associated accounts will be managed by the RTCC system administrator.

5.0 Data Storage, Retention and Deletion

5.1 How will data be securely stored?

Data is securely stored by the vehicle tracking technology vendor and will be transferred to the case investigator only via Seattle Police Department owned and authorized technology. At that time, vehicle tracking data collected by the tracking device is downloaded from the vendor software and resides only with the investigation file.

GPS pursuit mitigation tracking data is stored on the AWS gov-cloud certified infrastructure and encrypted against unauthorized access. Vendors are required to be SOC2/Type II certified to meet City cybersecurity requirements.

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

TESU keeps logs of vehicle tracking device requests, deployments, and access to the equipment. The Office of Inspector General and the federal monitor can access all data and audit for compliance at any time.

GPS pursuit mitigation tracking data retention standards are set by Seattle PD. Upon written authorization, technology vendors will delete data and verify such.

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

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense (GO) Report.

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

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

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

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

SPD’s Intelligence and Analysis Section reviews the audit logs and ensures compliance with all regulations and requirements.

Audit, Policy & Research Section personnel can also conduct audits of all data collection software and systems. Additionally, any appropriate auditor, including the Office of Inspector General and the federal monitor can audit for compliance at any time.

RTCC System Administrators will manage the GPS pursuit mitigation tracking system to ensure that the retention requirements meet those of SPD.

6.0 Data Sharing and Accuracy

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

No person, outside of SPD, has direct access to the covert tracking units or the data. Data obtained from the system may be shared outside SPD with the other agencies, entities, or individuals within legal guidelines or as required by law.

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

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

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

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

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

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

GPS pursuit mitigation tracking data will be shared with neighboring law enforcement agencies as needed for operational purposes. As tracked vehicles leave the City limits, it will become necessary for partner law enforcement agencies to have the tracking information to assist with tracking and apprehension. Conversely, other agencies using GPS pursuit mitigation tracking systems may need to share their tracking information with SPD as their tracked vehicles enter the City limits.

As the GPS pursuit mitigation tracking data is included in SPD police reports, the above listed agencies will also have access via investigative files.

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 investigation, and to comply with legal requirements.

For GPS pursuit mitigation tracking, data sharing is critical, as fleeing suspects often cross jurisdictional boundaries, necessitating interagency cooperation.

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 [28 CFR Part 20](#). In addition, Washington State law enforcement agencies are subject to the provisions of [WAC 446-20-260](#), and [RCW Chapter 10.97](#).

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?

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

Following Council approval of the SIR, SPD must seek Council approval for any material change to the purpose or manner in which Tracking Devices 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.

Tracking devices capture location information as it moves in relation to GPS satellites as it moves locations. They may also rely on cellular technology to track its location. The devices do not check for accuracy, as they are simply capturing a live information and sending position information. They are not interpreting or otherwise, analyzing any data they collect.

For GPS pursuit mitigation tracking, officers arriving at the site of a tracked vehicle will validate the vehicle they observe matches the description of the vehicle for which there is probable cause or reasonable suspicion (including license plate where possible), prior to taking any additional enforcement action.

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

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

7.0 Legal Obligations, Risks and Compliance

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

Covert tracking devices are only utilized with express consent or search warrant authority. SPD must comply with all legal requirements for securing consent or a search warrant; see, [US v. Jones](#) and [State v. Jackson](#)). GPS pursuit mitigation trackers are only utilized when there is probable cause or reasonable suspicion that a vehicle has been involved in a crime, consistent with the RCW governing vehicle pursuits by law enforcement.

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

[SPD Policy 12.050](#) mandates that all 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 location information of members of the general public. As it relates to covert tracking, SPD mitigates this risk by deploying them consistent to the stipulations outlined in the Washington Privacy Act, [Chapt. 9.73 RCW](#), and only by consent and/or with authorization of a court-ordered warrant. For GPS pursuit mitigation trackers, deployment is limited to vehicles for which probable cause or reasonable suspicion has been established. Additionally, the limited battery life of GPS pursuit mitigation trackers reduces the likelihood of inadvertent tracking of uninvolved parties. The ACLU cited this limitation in their letter addressing the use of GPS pursuit mitigation as a reason they are not concerned with civil liberties related to the use of this technology.

[SMC 14.12](#) and [SPD Policy 6.060](#) direct all SPD personnel to “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.”

Additionally, [SPD Policy 5.140](#) forbids bias-based policing and outlines processes for reporting and documenting any suspected bias-based behavior, as well as accountability measures.

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 information obtained through covertly tracking members of the public is the risk that private information may be obtained about members of the public without their knowledge and that their Fourth Amendment protections against “unreasonable searches” may be violated. This risk and those privacy risks outlined in 7.3 above are mitigated by legal requirements and auditing processes (i.e., maintenance of all requests, copies of consent forms and warrants) that allow for any auditor, including the Office of Inspector General and the federal monitor, to inspect use and deployment of tracking devices. The potential of privacy risk is mitigated by the requirement of consent and/or court ordered warrant before the technology is utilized.

The use of GPS pursuit mitigation trackers is limited to vehicles for which probable cause or reasonable suspicion has been established, the same standard set forth in state law for justification of vehicle pursuits. By tracking such a vehicle, it is possible to, by default, track the occupants of that vehicle. However, such occupants would be the subjects of a criminal investigation, either listed as suspects or eliminated through investigative efforts. The same concerns and mitigations listed above for covert tracking systems apply to GPS pursuit mitigation trackers.

In 2014, Jay Stanley, a senior policy analyst for the ACLU, wrote an opinion letter supporting the use of Starchase, a GPS pursuit mitigation tracking vendors long as the technology is used as intended in the exigent moments surrounding a police stop and pursuit, and not to subvert what would otherwise require a warrant. In 2022, Mr. Stanley reaffirmed this position, saying “I have not heard of any civil liberty issues with that technology.”⁴

⁴ ACLU “GPS Bullets’ Allow Police To Shoot a Tracker Onto a Car, Jay Stanley

8.0 Monitoring and Enforcement

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

Each unit maintains logs of deployment. These logs are available for audit, both internally and externally.

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

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

The technology vendor does not provide records to anyone other than Seattle PD, except by department preauthorized data sharing agreements.

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.

No formal audits exist for covert tracking device deployments; however, requests to utilize covert tracking devices, as well as logs of deployments, are kept within each unit, and are subject to audit by the unit supervisors, Office of the Inspector General, and the federal monitor at any time.

GPS pursuit mitigation trackers create a record of the deployment, to include the dates, times, locations (including latitude/longitude). These records are maintained in accordance with the Department’s retention requirements and can be view at any time by the Office of the Inspector General.

Financial Information

Purpose

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

1.0 Fiscal Impact

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

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

Current potential

Date of initial acquisition	Date of go live	Direct initial acquisition cost	Professional services for acquisition	Other acquisition costs	Initial acquisition funding source
	June 2025	\$250,000			Dept of Commerce Law Enforcement Pursuit Tech

Notes:

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

Current potential

Annual maintenance and licensing	Legal/compliance, audit, data retention and other security costs	Department overhead	IT overhead	Annual funding source
\$37,500				

Notes:

If the GPS pursuit mitigation trackers are determined to be a worthwhile program, the ongoing cost to maintain the 25 launchers' subscriptions is \$37,500.

1.3 Cost savings potential through use of the technology

Cost savings may be seen in reduced liability from decreased number of vehicle pursuits, which often result in litigation. Additionally, pursuits often result in damage to city owned equipment, specifically police cars. This technology can reduce those costs as well by negating the need for pursuits.

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

Additional grants may be available in the future to provide ongoing funding, should the department decide to increase or continue the deployment.

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
Tacoma Police Department	Deputy Chief Paul Junger	Pursuit mitigation.

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

Title	Publication	Link
GPS Bullets’ Allow Police to Shoot a Tracker Onto a Car	American Civil Liberties Union (ACLU)	https://www.aclu.org/news/national-security/gps-bullets-allow-police-shoot-tracker-car
Pursuit Technology Impact Assessment	Police Executive Research Forum	https://www.ojp.gov/pdffiles1/nij/grants/250549.pdf

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.

Adaptation of the RET for Surveillance Impact Reports

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

Racial Equity Toolkit Overview

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

1.0 Set Outcomes

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

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

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

None, per ACLU letter.

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.

None.

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

all Seattle neighborhoods

- | | |
|---|--|
| <input type="checkbox"/> Ballard | <input type="checkbox"/> Northwest |
| <input type="checkbox"/> Belltown | <input type="checkbox"/> Madison Park / Madison Valley |
| <input type="checkbox"/> Beacon Hill | <input type="checkbox"/> Magnolia |
| <input type="checkbox"/> Capitol Hill | <input type="checkbox"/> Rainier Beach |
| <input type="checkbox"/> Central District | <input type="checkbox"/> Ravenna / Laurelhurst |
| <input type="checkbox"/> Columbia City | <input type="checkbox"/> South Lake Union / Eastlake |
| <input type="checkbox"/> Delridge | <input type="checkbox"/> Southeast |
| <input type="checkbox"/> First Hill | <input type="checkbox"/> Southwest |
| <input type="checkbox"/> Georgetown | <input type="checkbox"/> South Park |
| <input type="checkbox"/> Greenwood / Phinney | <input type="checkbox"/> Wallingford / Fremont |
| <input type="checkbox"/> International District | <input type="checkbox"/> West Seattle |
| <input type="checkbox"/> Interbay | <input checked="" type="checkbox"/> King county (outside Seattle) (Mutual Aid) |
| <input type="checkbox"/> North | <input checked="" type="checkbox"/> Outside King County (Mutual Aid) |
| <input type="checkbox"/> Northeast | |

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

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

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

No information at this time.

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?

The technology will be equally deployed throughout the city to maximize availability for needed deployments.

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?

None.

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?

None identified.

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.

There is potential for officers to default into a pursuit in an effort to apply the tag. This can be addressed by policy and training.

2.0 Public Outreach

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

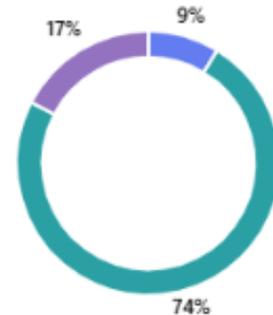
3.0 Public Comment Analysis

The public comment period was April 14, 2025 to April 28, 2025.

3.1 Summary of Response Volume

9. OPTIONAL Demographic Question: Age Range

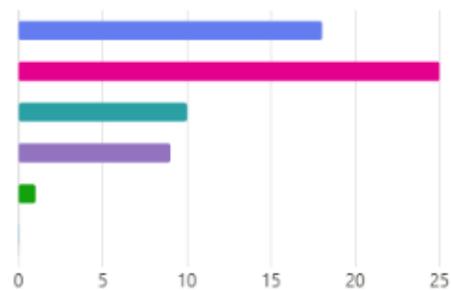
● Prefer not to identify	6
● Under 18	0
● 18 - 44	51
● 45 - 64	12
● 65+	0



11. OPTIONAL Demographic Question: Gender

[More details](#)

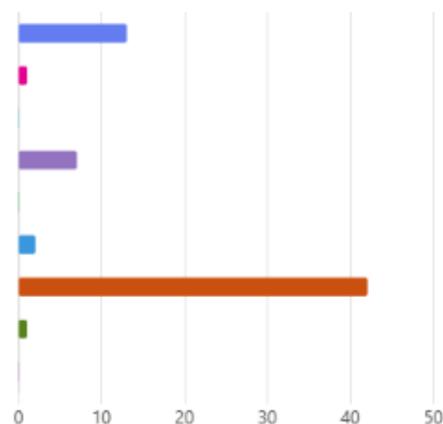
● Prefer not to say	18
● Woman	25
● Man	10
● Non-binary or gender non-conforming	9
● Transgender	1
● Not listed	0

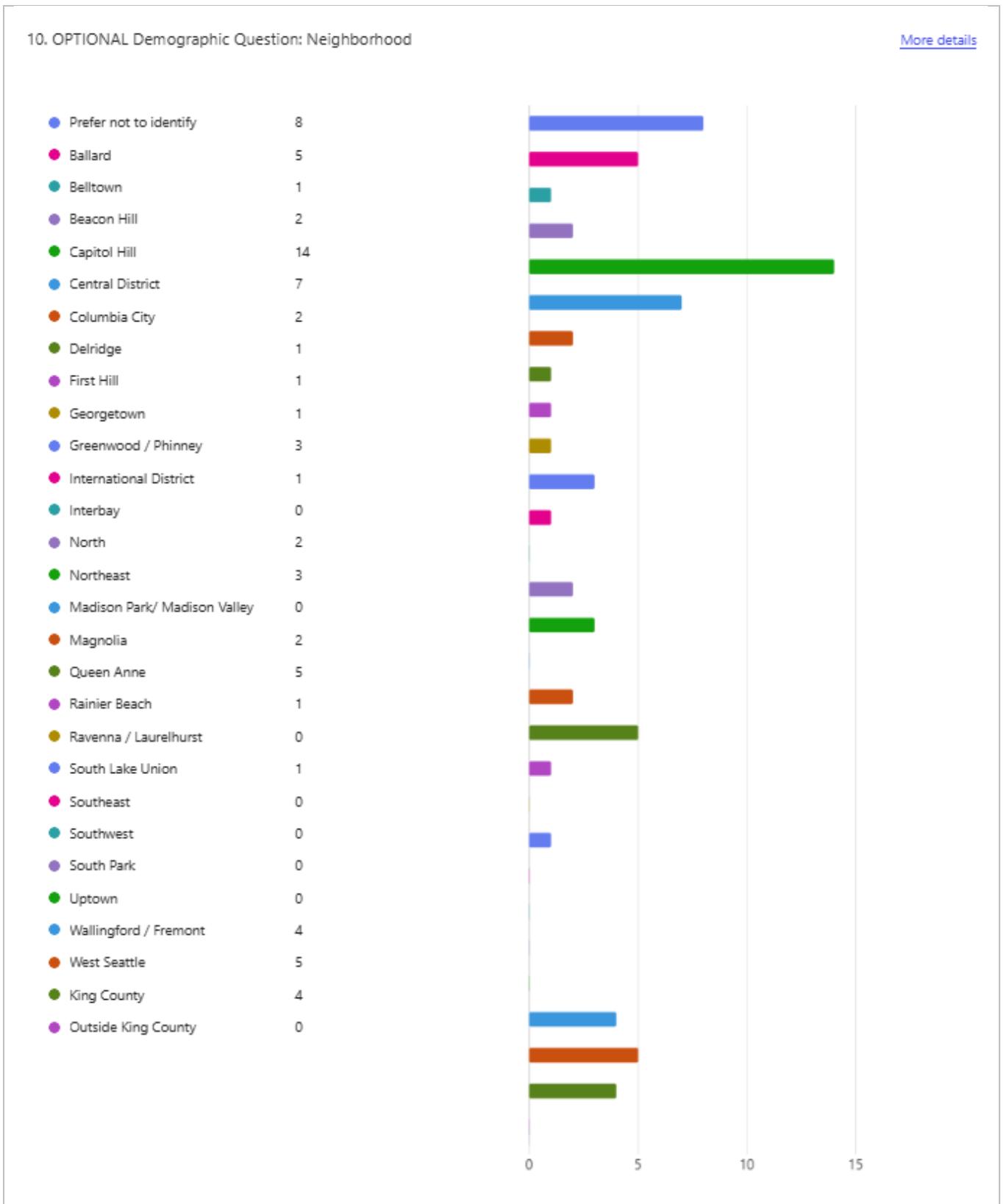


12. OPTIONAL Demographic Question: Which race (s) / ethnicity (or ethnicities) do you identify as

[More details](#)

● Prefer not to identify	13
● Black / African American	1
● Hispanic / Latino	0
● Asian / Asian American	7
● Native Hawaiian or Pacific Islander	0
● Indigenous	2
● White or Caucasian	42
● Another race/ethnicity	1
● Other	0





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?

5.0 Equity Annual Reporting

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

Metrics on covert tracking technology are gathered by the OIG for their annual surveillance technology audits.

Usage reports on GPS pursuit mitigation trackers will be available through the RTCC information portal and reports.

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 126776](#) adopted by the City Council on 2/28/23 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 of Civil Rights.”

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

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

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

RET: “racial equity toolkit”

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

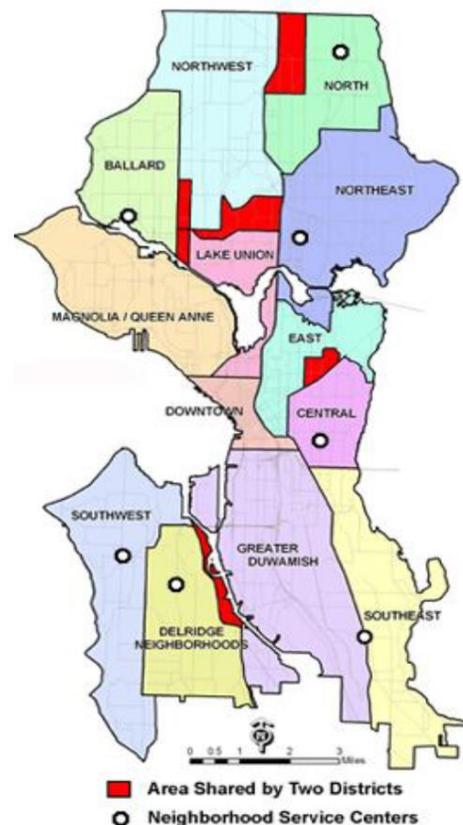
Stakeholders: (taken from the racial equity toolkit.) Those impacted by proposed policy, program, or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ethnic groups, other institutions like Seattle housing authority, schools, community-based organizations,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

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

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

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

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



Appendix B: Public Comment Period (4/14/25 to 4/28/25)

Dear Seattle City Leadership,

Here is my public comment on the Material Updates to the proposed new SPD Tracking Devices Surveillance Impact Report (SIR).

Highest Concern - Huge Change Necessitates New Standalone SIR, Not Material Update:

First and foremost, this proposed change should not be happening via a Material Update to an existing SIR. The changes described by SPD are not an update to an existing technology but instead are entirely new technology and so should have it's own standalone fresh SIR. The new pursuit trackers are from a completely different vendor (likely StarChase) and are not inter-operable with the existing undercover covert location trackers SPD uses (CovertTrack). The pursuit trackers are also: managed by a different team in SPD (RTCC, not the TESU); don't have a formal check-in/-out paperwork process and instead are solely used under (supposedly) exigent circumstances; have a different legal threshold for when they are used (probable cause/reasonable suspicion, not warrant/consent higher threshold); and would be expected to have have vastly different duration of deployment & success criteria (near-term apprehension, not primarily to gather data for a longer-term investigation). Additionally, the City's own tracked-changes document shows that they replaced all of their answers to every question in the SIR, which that alone should justify a standalone new SIR, not a Material Update process. Moreover, the Racial Equity Toolkit (RET) include in the SIR seems to have had all it's answers replaced such that they **only** are regarding the pursuit trackers and the covert trackers are no longer even included in the RET. Similarly, the Financial Information section was also replaced such that it too seems to **only** cover the pursuit trackers, not the covert trackers. In multiple places throughout the SIR, SPD does not clearly distinguish whether statements they made are referring to covert or pursuit trackers (especially later into the SIR). Given the final SIR that is approved by City Council is legally binding, there should not be any ambiguities. Clearly this is more than sufficient evidence that the pursuit trackers should be split off and have their own new standalone SIR created, not poorly glued onto the covert trackers SIR via the Material Update process.

Pursuit Location Trackers Concerns & Recommendations

1) **Dangerously Lowers Standard for SPD Engagement:** Wider scope of "reasonable suspicion" and "may flee" lowers the existing bar in SPD's Police Manual and increases the likelihood of escalation of violence in police encounters.

- (a) Item 3.2 of the revised SIR says that, in order to deploy the pursuit trackers, "officers must establish reasonable suspicion or probable cause for the stop of a vehicle. At that point, officers will have the discretion to deploy the GPS pursuit mitigation trackers if it appears the vehicle may flee."
- (b) SPD's Police Manual (13.031-POL-2) says that sworn employees may not initiate a pursuit unless: "...There is reasonable suspicion to believe that a person in the vehicle has committed or is committing a **violent offense or sex offense** (RCW 9.94A.030); **and The person poses a threat of death or serious physical injury to others** such that, under the circumstances, the public safety risks of failing to apprehend or identify the person are greater than inherent risk of pursuit driving;..." [bolding mine, reference: <https://public.powerdms.com/Sea4550/tree/documents/2042751>]
- (c) Both unnarrowed "reasonable suspicion" and "may flee" is SIR greatly lower the existing threshold for SPD's level of engagement with residents.

- (d) Using the threshold of reasonable suspicion at a traffic stop means that SPD could deploy a tracker against residents stopped for low-level traffic violations and not wanted in connection with a violent or sexual offense nor posing a threat to others, simply for avoiding eye contact or other neurodivergent behavior that frequently is misunderstood by officers as suspicious or dangerous [<https://uwe-repository.worktribe.com/output/8688572/caught-in-the-net-police-powers-of-investigation-and-the-risks-for-autistic-individuals>]
- (e) Even the act of firing the tracker at the vehicle, especially if the resident's vehicle had come to a stop, increases the likelihood for escalation of violence since the the resident may think that the sound they heard and the thud on their vehicle was SPD opening fire on them and they may in turn respond with more violence.
- (f) If the purpose of pursuit trackers is to avoid high speed pursuits, then the trackers should only be deployed under at least the same existing legal threshold for when SPD would otherwise initiate a high speed pursuit.
- (g) The 2014 ACLU National post referenced by SPD in the revised SIR specifically says it should only be used "in police chases that commence when a police officer has the equivalent of probable cause", so SPD's proposed threshold is below the minimum level stated by their own reference [<https://www.aclu.org/news/national-security/gps-bullets-allow-police-shoot-tracker-car>]. In addition to stating probable cause is the minimum, please note that the ACLU National letter also said "chases that commence", not "will commence", because the legal standard should not rely on guesswork and officer biases - "may flee" is a completely unacceptable legal threshold to use.

Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, replace "may flee" with "is currently fleeing" and remove "reasonable suspicion" and instead require at the minimum "probable cause" before a pursuit tracker can be deployed.

2) Won't Reduce SPD High-Speed Pursuits: The revised SIR doesn't require SPD to terminate the pursuit once the tracker is deployed and SPD officers also have a history of engaging in uncalled for high speed pursuits.

- (a) The revised SIR only says that officers **can** terminate a pursuit after the tracker is deployed. The SIR does not say officers must terminate the pursuit.
- (b) And multiple SPD officers have a history of engaging in uncalled for high speed pursuits, which shows a department-wide problem, and this only includes the sustained OPA findings in the last couple of years (so not counting the situations that weren't reported to OPA):
 - o 2024OPA-0012:
<https://www.seattle.gov/Documents/Departments/OPA/ClosedCaseSummaries/2024OPA-0012ccs7-2-24.pdf>
 - o 2024OPA-0044:
<https://www.seattle.gov/Documents/Departments/OPA/ClosedCaseSummaries/2024OPA-0044ccs5-23-24.pdf>
 - o 2024OPA-0225:
<https://www.seattle.gov/Documents/Departments/OPA/ClosedCaseSummaries/2024OPA-0225ccs1-31-25.pdf>
 - o 2023OPA-0015:
<https://www.seattle.gov/Documents/Departments/OPA/ClosedCaseSummaries/2023OPA-0015ccs090823.pdf>
 - o 2023OPA-0056:
<https://www.seattle.gov/Documents/Departments/OPA/ClosedCaseSummaries/2023OPA-0056ccs081723.pdf>

- 2021OPA-0528: <https://www.seattle.gov/documents/departments/opa/closedcasesummaries/2021opa-0528ccs060922.pdf>
- 2021OPA-0281: <https://www.seattle.gov/documents/departments/opa/closedcasesummaries/2021opa-0281ccs032922.pdf>
- 2021OPA-0063: <https://www.seattle.gov/Documents/Departments/OPA/ClosedCaseSummaries/2021OPA-0063ccs111821.pdf>
- 2020OPA-0407: <https://www.seattle.gov/Documents/Departments/OPA/ClosedCaseSummaries/2020OPA-0407ccs012921.pdf>

Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, require that SPD terminate the pursuit once the tracker is deployed.

3) **Irresponsible Use of City Funds:** The cost information provided by SPD is both incomplete and appears inflated; plus pursuit trackers require a subscription for which SPD has no funding source.

- (a) It's completely irresponsible to sign the City up for yet more recurring costs for more cop tech toys while the City is facing a historical deficit.
- (b) SPD deleted both the initial acquisition and annual maintenance & licensing cost of the undercover covert trackers which were included in items 1.1 and 1.2 of the Financial Information section of the revised SIR. Presumably SPD is not throwing away their covert trackers and surely the vendor is not providing location services for free, so the Financial Information section is now incomplete.
- (c) SPD says the direct initial acquisition cost for the system is \$250,000 (which doesn't include professional services, like vendor-provided installations or training) and they'll have 25 pursuit trackers, which equals \$10,000 per tracker launcher system. However, other cities are paying around \$5,000 - \$6,000 per launcher system acquisition [see: <https://www.policemag.com/vehicle-ops/article/15347647/pursuit-tracking> and <https://www.tontitown.com/wp-content/uploads/2020/02/10b-Star-Chase.pdf>]. This means SPD's listed direct acquisition cost is roughly \$100,000 over the expected cost. So the Financial Information SPD provided appears to be inflated.
- (d) Additionally, the recurring annual cost is listed by SPD as \$37,500 (or \$1,500 per tracker) lists the annual funding source as "Unknown". This means that SPD will use state grant money to acquire hardware that then also signs the City up for recurring additional costs that have no funding source.
- (e) The 2017 Pursuit Technology Impact Assessment referenced by SPD in the revised SIR states that "The GPS tags are consumables that must be replaced after use. The tags, once deployed/used, are recovered and sent back to StarChase for either refurbishment or replacement" [<https://www.ojp.gov/pdffiles1/nij/grants/250549.pdf>]. However, SPD does not mention this in the SIR, nor did SPD clarify whether or not there is any additional cost associated with refurbishment or replacement of each tracker. This is another way the fiscal information is incomplete.
- (f) The ineffectiveness of pursuit location trackers combined with their cost is why multiple other municipalities have not renewed their contracts [see: <https://www.tmj4.com/news/i-team/praised-milwaukee-police-starchase-pursuit-program-shelved> and <https://oaklandside.org/2024/07/22/oakland-police-pursuits-starchase/>]

Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, require that the Financial Information section must be updated to reflect real actual totals and breakdowns of the cost for both the pursuit trackers and undercover location trackers.

Undercover Covert Location Trackers

1) Covert Trackers Used for Non-Felony Investigations: Nothing limits or prohibits SPD from using undercover location trackers for non-felony criminal investigations.

- (a) The UN ODC report cited by SPD in the SIR, states that "The use by law enforcement of electronic surveillance should not be an investigative tool of first resort, instead its use should be considered when other less intrusive means have proven ineffective or when there is no reasonable alternative to obtain crucial information or evidence" and "In general, the principles or policy considerations which limit the use of electronic evidence surveillance in the investigation of serious crime include ... Proportionality: that the intrusion into privacy is proportionate to the seriousness of the suspected offence and the evidence it is anticipated will be obtained" [https://www.unodc.org/documents/organized-crime/Law-Enforcement/Electronic_surveillance.pdf].
- (b) Nothing explicitly requires that SPD's use of undercover location trackers is proportional to the crime or otherwise limited to specific types of crime.

Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, limit the use of undercover location trackers to only "violent offenses" or "most serious offenses", as defined in RCW 9.94A.030.

2) Abuse of Covert Trackers for Personal Use: These devices could be used as tools of domestic violence, stalking, and blackmail.

- (a) The Seattle Surveillance Ordinance doesn't address individual City employees acting outside the scope of what's been approved via the Ordinance; so an individual officer using one of these covert trackers to surveil their current partner, ex-partner, or dating prospects is not illegal under the Ordinance.
- (b) Similarly, an individual officer could use one of these covert trackers to surveil, say, a journalist who has written harsh exposé on the officer or the SPOG, and that is not illegal under the Ordinance.
- (c) The Surveillance Ordinance lacks preventions, protections, remedies, and penalties for these types of situations.

Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, explicitly add a provision that the use of tracking devices except pursuant to that defined in the final SIR exposes the individual officer to criminal or civil liability.

3) True Consent Frequently Impossible: Given the power imbalance between an SPD officer and member of the public, many people would not feel they have the power to deny the request for consent-based usage of these tracking devices. It may not take much for people to feel coerced into giving consent, even if it puts their own life in danger.

Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, require legal representation for all consent-based use of the undercover location tracking devices.

4) Excessive Data Sharing: Nothing prohibits the propagation of the geolocation data from these devices, such as to partner agencies uninvolved with the investigation and/or to Fusion Centers. This is specially concerning when that location data was for a case where charges were dropped; or the data was shared before it gets validated via the court proceedings process (so the evidence in the location might be so poor

in quality to not be admissible in court but is already shared with an outside agency or Fusion Center in that unvalidated state). It would also be concerning if the location data was shared without a warrant. Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, prohibit SPD from sharing location data attained from covert tracking devices without a warrant or when the charges are dropped. This includes not sharing such data with Fusion Centers.

5) Predictive Policing: Predictive policing is highly biased by its very nature and it has a high likelihood of endangering & ruining the lives of innocent people. So it's very concerning that nothing prohibits SPD from feeding location data from covert tracking devices into predictive policing software. Recommendation: Ban predictive policing.

6) No Data Localization: The online portal mentioned in item 2.3 in the SIR is hosted externally to the SPD network and very likely isn't even hosted inside WA state. This means that the manufacturer (CovertTrack) would have access to all the GPS data being collected by the device; and that data isn't protected by the Keep WA Working Act or the WA Shield Law. And the SIR doesn't include what security controls are in place to prevent the public from accessing the portal.

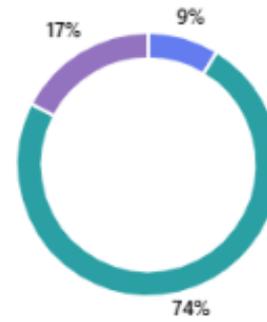
Recommendation: SPD must not deploy trackers. If City Council approves of this anyways, then at a minimum, require that the data generated by the covert trackers is entirely collected, processed, and stored only within WA state.

Please seriously consider my public comment. Thank you

Demographic Questions:

9. OPTIONAL Demographic Question: Age Range

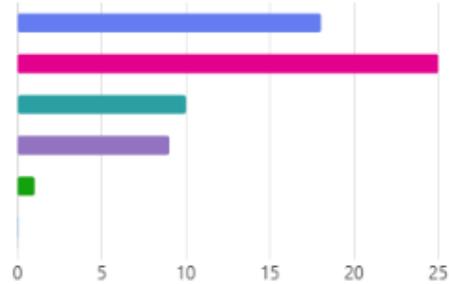
● Prefer not to identify	6
● Under 18	0
● 18 - 44	51
● 45 - 64	12
● 65+	0



11. OPTIONAL Demographic Question: Gender

[More details](#)

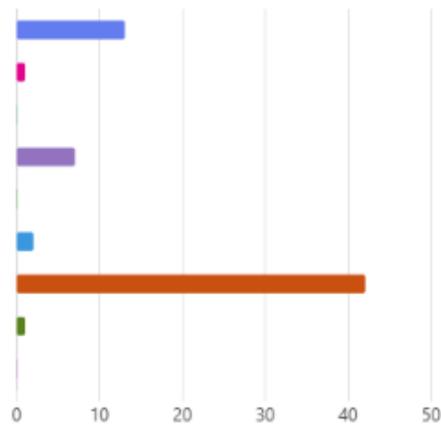
● Prefer not to say	18
● Woman	25
● Man	10
● Non-binary or gender non-conforming	9
● Transgender	1
● Not listed	0



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

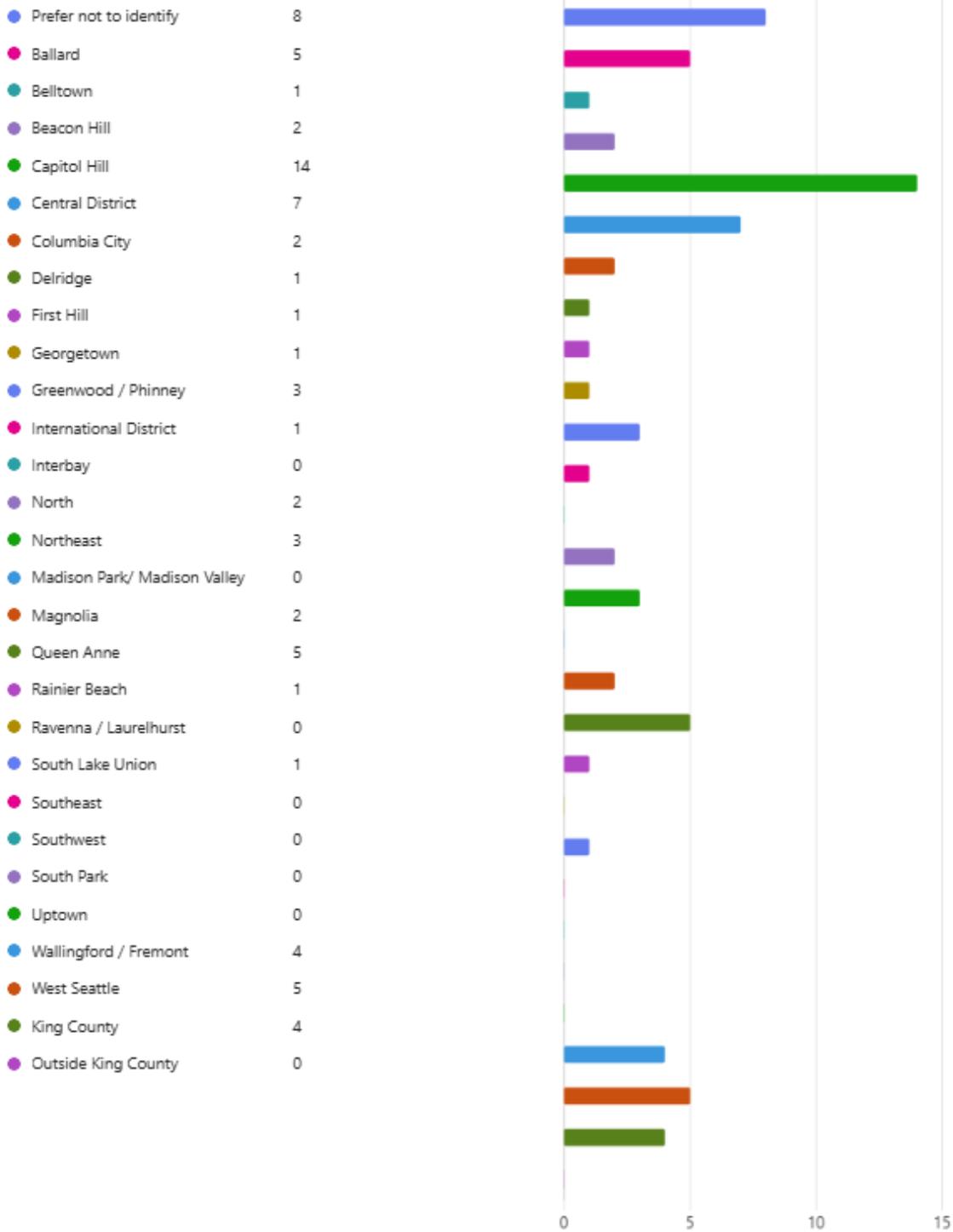
[More details](#)

● Prefer not to identify	13
● Black / African American	1
● Hispanic / Latino	0
● Asian / Asian American	7
● Native Hawaiian or Pacific Islander	0
● Indigenous	2
● White or Caucasian	42
● Another race/ethnicity	1
● Other	0



10. OPTIONAL Demographic Question: Neighborhood

[More details](#)



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1	This is such a gross violation of civil rights. Police especially SPD will use this in any way they please and puts people who are for example exercising protected rights to free speech and assembly at risk for unethical tracking.		Absolutely none. For SPD to abuse their already extensive power to wreak havoc		The best interest of its constituents and not what SPOG lobbies for new toys		
2	We already live in a surveillance state with a violent and dangerous police force. SPD are known for being reckless with vehicles. Empowering them to mark more "suspected criminal" cars will lead to more reckless car chases and violence against pedestrians, as well as encroaching on people's basic rights to dignity, privacy and due process.		None.		I would appeal to their moral values and ask them to think of their constituents. What will actually keep people safest? Not allowing unlimited police supervision!		

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3	<p>This will cost the SPD and taxpayers far too much money to defend. "Reasonable Suspicion" is too low a standard, too ambiguous, and will likely bring about quick lawsuits. There is precedent for requiring a much higher standard of probable cause and warrants for this type of surveillance in other cities that will, no doubt, be cited in cases against SPD if this were to be implemented.</p>	<p>It's also wrong and quite chilling to want to allow this sort of surveillance against citizens on the whim of police officers in the field at any given moment.</p>			<p>You conscience. The rights that you yourselves would want if you found one of these trackers on your car, your spouse's car, or your child's car. Or, if none of that gets through, the money this will cost the city to defend.</p>		

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4	Placing a tracking device on a vehicle should require a signed search warrant from a judge. "Reasonable suspicion" is not sufficient to permit the installation of a tracking device on a vehicle, and constitutes an unreasonable search under the 4th Amendment. Since the search is unconstitutional, it cannot be lawful, therefore police officers who install a tracking device without a warrant should be tried and convicted personally for stalking under state law RCW 9A.46.110.		Tracking devices and other invasive surveillance technology are not necessary. The police should focus on making the best use of the tools they have.		City leadership should focus on keeping the police department accountable for their actions and acting in the best interests of the people they ought to be protecting. Expanding the police's use of surveillance technology, if anything, increases the risk that officers abuse their power and do harm.		
5	Without probable cause, then it's a privacy violation.	So many civil liberty violations on the premise of this. Too many to list here.	None. Just another tool for the police to over-utilize on mostly innocent people.		Pay attention to civil liberties.		

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6	This is a blatant attempt to track anyone Trump doesn't like. "Reasonable" means absolutely nothing when citizens are already being disappeared by law enforcement. This is obviously a fascist move.		There is no value in the use of this technology.		Consider whether you have the moral integrity to stand up to what Trump is doing. Grow a spine.	Take into account that if you allow this to go ahead, you are capitulating to a fascist regime.	
7	This will be used to harm our communities and enforce nothing but racism and more violence against our neighbors.	Don't let the cops have trackers the cops are literally killing people constantly.	Put trackers on cop cars and let the people they endanger keep track of them	I see no value in surveillance that only serves to divide us and shatter us and disempower us.	Consider the vulnerable people who will be harmed with the misuse of the power of this technology by an institution that continues to misuse its power and technology. Consider all the vulnerable people who won't be helped at all by this technology. Consider how this is just another grift to protect business and ingrained power, and harm our communities.	Just don't, you know it is wrong, and if you don't, you are a blind fool.	You are our government, you need to protect us.
8	It can give law enforcement an easy way to track any vehicle. "Reasonable suspicion" is a low standard that allows for a breach of privacy.		None, the community will be more unsafe because of this technology				

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9	This can be used to target innocent people. Don't let surveillance state become a reality				How this can disproportionately be used in a biased way based on suspicion instead of fact		
10	Fascism		Not much		Right to privacy	Misuse possibilities are massive and life changing	Who watches the watchers
11	With "reasonable suspicion", the threshold of justification is low and these can easily be abused by SPD for stalking exes and other unethical surveillance, which there are multiple recorded instances of with SPD with other surveillance technology. These technologies have not been shown to decrease high speed pursuits and there is always a power imbalance where it is very difficult for a person to not consent to a tracker		I see this as harmful and not beneficial to the public in Seattle		Do not spend more resources giving SPD more surveillance technology which doesn't actually improve public safety, instead use those resources to directly help people in need		

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12	<p>Both Covert Trackers and Pursuit Mitigation Trackers raise serious civil liberties concerns. Covert Trackers enable warrantless, mass surveillance with little oversight, while Pursuit Mitigation Trackers escalate interactions and create unnecessary danger during traffic stops. SPD's history of misusing surveillance tools makes the use of these technologies especially troubling.</p>		<p>There is no demonstrated value in either of these technologies that outweighs the risks. SPD has provided no data proving Pursuit Mitigation Trackers reduce police pursuits or improve safety. Covert Trackers only serve to expand surveillance with minimal effort or oversight, undermining community trust. If these tools were effective, SPD should be able to show clear, peer-reviewed evidence of improved safety or reduced pursuits. Instead, they are seeking broad authorization based on vague claims. Given SPD's documented record of ignoring pursuit policies and misusing data systems, these technologies are likely to be abused.</p>		<p>City leadership should consider the broader impact on civil liberties, public safety, and community trust. These tools enable more surveillance and more escalation, not less. SPD has repeatedly ignored policies and oversight; adding new technologies without strong accountability only compounds the problem. Consent to surveillance is not valid when there is a power imbalance, as the ACLU has pointed out. "Reasonable suspicion" and "may flee" are dangerously low thresholds that open the door to overreach and discrimination. These tools should be rejected outright—not regulated or reformed.</p>		<p>Why is the public comment period so short for such significant surveillance technologies? The rushed timeline suggests a lack of transparency and a disregard for meaningful community engagement. SPD should not be trusted with expanded surveillance authority without clear, proven benefits and real accountability mechanisms.</p>

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13	The degree of government surveillance is already way too great. It does not need to be expanded.		None. The police already have enough tools at their disposal to initiate traffic stops, and have demonstrated willingness to manufacture probable cause.		Consider that the expansion of police power and surveillance under the current government, one that is rife with abuses of power, is a disaster in the making.		
14	<p>Government surveillance is increasingly correlated with demonstrable violations of civil liberties. Further, the bar for StarChase is so incredibly low and subject to bias, poor judgment, and straightforward mistakes that will inevitably harm our most vulnerable neighbors and community members.</p> <p>Our community does not need increased surveillance. Our community will not benefit from living in greater fear of the police than we already do. The harms that will surely come from this far, far, far exceed the potential benefits of the use of such technology.</p> <p>SPD, do NOT do this.</p>	Yes. Use of this technology only increases harm to our community. SPDs role should be to decrease harm, not increase it.	I see value only in the rarest of cases ("rare" meaning not even once per year in the state of WA). And in those cases, the very highest standards, and the most scrupulous and thorough judicial review should be required. Such reviews should be so strict that more often than not, a warrant is denied.		Listen to your community members and legal experts who are making the case that this is a very bad idea. Do NOT proceed with use of this technology.	This will make us less safe. Do NOT do this. Please.	Please, do NOT do this.

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15	<p>Covert trackers increase the number of people under SPD surveillance by making it a lot easier for SPD to surveil people. Needing to have cops follow a car means SPD has to be very selective about who it surveils and creates a really high bar for surveillance. Being able to just put a tracker on a car & not devote cops means SPD doesn't need to be so selective and lowers the bar for surveillance. The use of covert trackers not being limited to investigations of certain crimes demonstrates how these trackers increase the number of people being surveilled. Approval for covert trackers should be revoked due to this expansion.</p> <p>A member of the public can't genuinely consent to SPD placing a covert tracker due to the power imbalance between SPD and the member of the public. Any request by SPD to place a tracker is inherently coercive especially since SPD is allowed to lie to the public/use deception while members of the public can't legally do the same. If approval for covert trackers does not get revoked, use of them should be limited to court orders.</p> <p>Pursuit mitigation</p>	<p>The SIR's framing of RCW 10.116.060. 2.d as requiring police departments to acquire new pursuit mitigation technologies is so misleading that it could be considered a lie. That RCW merely states that after initiating an individual pursuit, the police should try to end that pursuit as soon as possible based on available options. The RCW doesn't say anything about acquiring additional options or expanding what options are available to each police department.</p>	<p>None. Police pursuits are incredibly dangerous and should be legislated out of existence, but these trackers will not reduce pursuits.</p>		<p>Why is the city considering technology (pursuit mitigation trackers) that does not reduce pursuits & can potentially create pursuits?</p> <p>Why is the city giving SPD technology (covert trackers) that increase the number of people being surveilled and lower the threshold for someone to be surveilled by making surveillance so much easier?</p> <p>Why is the bar for use of both technologies so low? Covert trackers not requiring a court order and being available for any type of investigation. Pursuit mitigation trackers being allowed for pre-crime scenarios of thinking a vehicle "may flee" and for all types of crime based on nothing more than a single officers hunch.</p> <p>4th amendment impacts of allowing police to track a vehicle for up to 8 hours based on nothing more than an officers hunch.</p> <p>Burden pursuit mitigation trackers place on members of the public to know exactly what is going on at all time.</p> <p>Why is SPD getting more toys supposedly to eliminate pursuits when SPD does not follow existing policy restricting pursuits?</p> <p>Why would SPD end pursuits due to a GPS tracker being on a car when SPD's history</p>	<p>SPD's ability to use covert trackers should be revoked, and SPD should not be allowed to acquire pursuit mitigation trackers.</p>	<p>The public comment period being so short suggests that the city doesn't actually want to hear from the public on these technologies.</p>

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	<p>trackers don't decrease police pursuits. SPD didn't submit any research indicating that these trackers cut down on the number of pursuits, duration of pursuits, or speed of pursuits. SPD has a history of officers engaging in dangerous pursuits that are not are barred by existing policy and not disciplining (or very lightly disciplining) those officers. SPD even has even pursued a vehicle through a crowded park and off a pedestrian bridge even though SPD was tracking it via Onstar/GPS & Onstar offered to remotely disable the vehicle.</p> <p>Pursuit mitigation trackers have the potential to increase police pursuits by allowing SPD to use them on vehicles that "may flee." Firing a tracker at the vehicle of someone that is currently complying is an escalation by SPD. Pursuit mitigation trackers hold members of the public to a much higher standard than SPD. SPD can use them for "reasonable suspicion" which is effectively a hunch or if they have a hunch/guess/claim that the member of the public "may flee" in the future. This is an incredibly low bar that's purely based on a single cop's perception (or</p>				shows they pursue cars being tracked by GPS.		

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	<p>claimed perception) and not based on actual facts. The member of the public is expected to know that what suddenly hit their car is a pursuit tracker fired by SPD and respond accordingly. If a member of the public panics & drives away because they thought what just hit their car was something else, they're facing charges of attempting to flee.</p> <p>Pursuit trackers currently have an 8 hour battery life. This opens the door for SPD to use them not to end a pursuit, but to surveil someone for a few hours without the person knowing based on nothing more than a hunch. This seems like a clear violation of the 4th amendment.</p>						

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16	<p>I'm concerned that these technologies will encourage unsafe and unreasonable police pursuits. There are several examples of SPD inappropriately pursuing vehicles, and my concern is that these technologies will encourage more of this action. SPU hasn't provided any information showing that this technology will reduce the number of pursuits. I would like to see time, energy, and money focused on reducing the number of pursuits rather than investing in this technology.</p>	<p>I am very concerned that this gives too much room for police to surveil the public. I am extremely concerned that use of this technology could escalate traffic stops. If someone doesn't know it's a tracker getting shot at their car, or if someone is in any way under informed about what is going on or experiencing any power dynamic between themselves and police which favors the police, this will escalate a situation. As the ACLU pointed out in a 2022 comment, it's very unlikely that someone could legitimately consent to SPD putting a tracking device on their vehicle.</p>	<p>There is no demonstrated value, and there is no clear, peer reviewed evidence showing that this technology will reduce police pursuits or improve safety in our city.</p>	<p>No.</p>	<p>Please consider the environment of fear and distrust that this will foster in our city if these technologies are implemented. People are already scared. This will make things worse. These technologies need to be completely rejected. We need effective solutions to makeign Seattle safer.</p>	<p>No.</p>	<p>Why is the public comment period so short? Have you consulted with community members of different races and ethnicities about how this would impact them and questions they have? Have you considered the valid points and concerns raised by ACLU? Have you considered the worst case scenario of what would happen if a police officer disobeying orders had these technologies at their disposal?</p>

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17	I think the wording is way too vague. "May flee" means that a officer can guess and judge a presumed innocent person. I also think that in a pursuit, if the GPS pursuit mitigation trackers are deployed, the offer MUST stop the pursuit. Not "can", which allows the officer to waste resources and continue to endanger people around them by continuing the pursuit. Also, for data storage, if the tracker is used because of a consenting witness, when will the data be deleted? Where will deployments that tag the wrong vehicle be documented?		Stopping high speed pursuits that harm citizens.		The lack of data. Thus far we only have the word of SPD that this has "positive outcomes" but until they can point to numbers that show this can decrease the number of high speed pursuits AND that those decreases resulted in higher safety, I do not believe them.		
18	Concern for privacy		None. There is already plenty		Consider the people who will be affected by this. The people who will be targeted by cops		

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19	<p>Covert trackers require either a court order/warrant or “consent” to be installed. As the ACLU pointed out in its June 2, 2022 comments on group 4b surveillance technologies (page 94), it is highly unlikely a person can legitimately consent to SPD placing a tracking device due to the power imbalance between SPD and the person. This difference in power means any request by SPD is naturally coercive/comes with a threat making a consent illegitimate.</p> <p>SPD has not provided any data showing that pursuit mitigation trackers actually reduce the number of pursuits. The Pursuit Technology Impact Assessment that SPD references did not examine whether or not these trackers reduce the number of pursuits, the duration of pursuits, or the speed of pursuits.</p>	<p>These are a way for police to escalate traffic stops and create high speed pursuit situations. This places a massive burden on the member of the public whose car SPD shoots at to know in the moment that what was fired was a GPS tracker. Some people will panic and try to flee because they won't have enough information to know what is happening.</p> <p>Police pursuits are incredibly dangerous and should be eliminated. But, these trackers won't cut down on pursuits by SPD, SPD will be free to continuing pursuing someone even after shooting a pursuit</p>	<p>I see no value for the people of Seattle with this technology.</p>				

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		mitigation tracker.					

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20	<p>I am very concerned about SPD's history of misusing police systems to spy on people. SPD cops have been caught misusing systems including to stalk an ex-girlfriend, dig into their wife & her friends histories, share information about a domestic violence investigation, and break HIPAA laws & share health information. Even the OPA has misused data and broken HIPAA laws.</p>	<p>SPD has not provided any data showing that pursuit mitigation trackers actually reduce the number of pursuits. The Pursuit Technology Impact Assessment that SPD references did not examine whether or not these trackers reduce the number of pursuits, the duration of pursuits, or the speed of pursuits. The biggest pursuit mitigation tracker company, StarChase, has been around for almost 20 years which is more than enough time to study whether these trackers actually reduce pursuits.</p>	None.	No.	Human rights. Privacy and freedom from surveillance and biased targeting		

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21	SPD has a history of abusing surveillance tools, they do not need access to this type of technology, "reasonable suspicion" is too broad of a scope and will endanger vulnerable populations		none, this will harm populations that SPD already discriminates against.		SPD previously pursued a vehicle that was being tracked via GPS into a crowded park & off a pedestrian bridge even though the vehicle was equipped with Onstar which was tracking the vehicle for SPD & offered to remotely shut down the vehicle. Having access to technology doesn't deter their behavior.		

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22	<p>I have myriad concerns about putting this tech in the hands of the police department. SPD has shown time & time again that they can not be trusted to use surveillance technology in a responsible or legal way. The department has been marred by more scandals than I can count & faced an injunction from the DOJ. Giving these officers carte blanche to conduct mass surveillance on Seattlites with a laughably low threshold to justify is not only a violation of our rights to privacy but also sets a dangerous precedent that plummets us ever closer to fascism and the mass surveillance state. This is a huge waste of taxpayer money & will not reduce high speed chases. It also endangers citizens who may naturally panic when they are being shot at without warning by police officers. This is a foolish idea that is out of step with what the people of Seattle want. Do not give the police guild city funds for this unnecessary unsafe tool that will be used to infringe on the rights of everyday people.</p>				<p>It will end up costing the city well beyond the already exorbitant price tag for this 'new toy' via the onslaught of lawsuits the PD will be subjected to when they invariably use this surveillance technology in inappropriate & illegal manners, as they have repeatedly demonstrated when given other surveillance technologies.</p>		

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23	<p>SPD should not have either of these technologies. It should not be allowed to purchase pursuit mitigation trackers, and its ability to use covert trackers should be revoked. SPD should not be able to surveil so many people at once and it's unlikely that people will be able to give consent due to power imbalance with police. Police will coerce them into allowing covert trackers. For pursuit mitigation trackers, "Reasonable suspicion" is an incredibly low threshold, cops have claimed things like averting eye contact or shaking hands are reasonable suspicion. And, "may flee" is even lower, it is a cop guessing what might happen. SPD has not provided any data showing that pursuit mitigation trackers actually reduce the number of pursuits.</p>		<p>No value. Too much police surveillance and dangerous technology.</p>		<p>Both technologies share the issue of SPD's history of misusing police systems to spy on people. SPD cops have been caught misusing systems including to stalk an ex-girlfriend, dig into their wife & her friends histories, share information about a domestic violence investigation, and break HIPAA laws & share health information. Even the OPA has misused data and broken HIPAA laws. Police pursuits are incredibly dangerous and should be eliminated. But, these trackers won't cut down on pursuits by SPD, SPD will be free to continuing pursuing someone even after shooting a pursuit mitigation tracker. SPD pursues who it wants to regardless of policy or technology.</p>		

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24	<p>It's unnecessary surveillance that has the vast potential for abuse by officers. There is no data that this technology helps reduce police pursuits. What it does do is give officers new tech to abuse and intimidate citizens. As the city grapples with budget constraints, particularly public schools, road conditions, and housing services, it is unconscionable that SPD wants to spend city budget on gadgets with no practical benefit.</p>	<p>It gives police too much power to stalk and surveil people and a dangerously low bar for employing the technology against any citizen at will. It gives officers the tools for abuse, not safety.</p>	<p>None. There is no value in SPD being able to track citizens. No good can come of this.</p>		<p>Consider how the technology can likely be abused or weaponized against civilians. Consider: Is there data proving the effectiveness of the technology? There is not in this case. Also consider how the funds can be used to actually serve the public (schools, infrastructure, housing), not just SPD's desire for shiny new toys.</p>		<p>Why does SPD really want these new gadgets? It certainly isn't to protect us.</p>

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25	<p>Mis-use and abuse of the technology by SPD officers (SPD has a long history of this!). The general increase in surveillance technology, which has been proven to be targeted unfairly towards minority communities. Waste of resources. We don't need this technology to make Seattle safer, and SPD officers will still have high speed chases, it's what they love to do</p>		None		<p>Please consider that a large and diverse coalition pushes back against new surveillance technologies every time SPD tries to waste our taxpayer money on them. No means no, we don't want or need more surveillance tech!</p>		

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26	<p>Covert Trackers – GPS trackers SPD installs as part of an investigation without the vehicle owner’s knowledge. Covert trackers require either a court order/warrant or “consent” to be installed.</p> <p>- As the ACLU pointed out in its June 2, 2022 comments on group 4b surveillance technologies (page 94), it is highly unlikely a person can legitimately consent to SPD placing a tracking device due to the power imbalance between SPD and the person. This difference in power means any request by SPD is naturally coercive/comes with a threat making a consent illegitimate.</p> <p>- Remote tracking, like covert trackers, increase the number of people being tracked by police because the barriers to the police using them are so low. Police are free to assign officers to follow/surveil someone, we’ve all seen this in various movies. Having officers follow/surveil someone is very resource intensive which limits the number of people the police can subject to such invasive surveillance creating some protection against mass surveillance. Covert trackers don’t require much in the way of officer time and allow for police</p>	<p>Pursuit Mitigation Trackers (aka StarChase) Pursuit Mitigation Trackers – Are projectiles that police shoot at cars SPD wants to acquire and be able to use these trackers any time there’s “reasonable suspicion” a vehicle was involved in a crime or if a cop thinks a car “may flee” a traffic stop. This is absurdly broad. “Reasonable suspicion” is an incredibly low threshold, cops have claimed things like averting eye contact or shaking hands are reasonable suspicion. And, “may flee” is even lower, it is a cop guessing what might happen. SPD has not provided any data</p>	None.	<p>Both Technologies Both technologies share the issue of SPD’s history of misusing police systems to spy on people. SPD cops have been caught misusing systems including to stalk an ex-girlfriend, dig into their wife & her friends histories, share information about a domestic violence investigation, and break HIPAA laws & share health information. Even the OPA has misused data and broken HIPAA laws.</p>	<p>The civil rights of and consent its citizens? How the SPD’s history of abusing these technologies makes issuing them additional capacity to do so an absurd proposal?</p>	<p>How about you actually start investing in our communities, instead of pretending to be the progressive leaders you are while making this city friendly only to corporations and the police?</p>	

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	<p>departments to greatly increase the number of people they surveil.</p>	<p>showing that pursuit mitigation trackers actually reduce the number of pursuits. The Pursuit Technology Impact Assessment that SPD references did not examine whether or not these trackers reduce the number of pursuits, the duration of pursuits, or the speed of pursuits. The biggest pursuit mitigation tracker company, StarChase, has been around for almost 20 years which is more than enough time to study whether these trackers actually reduce pursuits. These are a way for police to escalate traffic stops and create high speed pursuit situations. This places a massive burden on the member</p>					

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		<p>high speed pursuits. Some examples: SPD pursued a vehicle that was being tracked via GPS into a crowded park & off a pedestrian bridge even though the vehicle was equipped with Onstar which was tracking the vehicle for SPD & offered to remotely shut down the vehicle. SPD pursued a vehicle running stop signs and red lights despite being told by their superior to stop. SPD continuing a pursuit despite being order to stop, again SPD driving 3x the speed limit and running red lights without authorization for a pursuit. SPD invented probable cause to chase the</p>					

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		<p>wrong car at 100 mph through South Seattle</p> <p>The current battery life of these trackers is 8 hours which opens the door for police to misuse them to spy on people based on the incredibly low bar of "reasonable suspicion"</p> <p>SPD's reference to RCW 10.116.060. 2.d in the material update is incredibly mis-leading.</p> <p>The RCW directs police departments to end each individual pursuit as soon as possible based on available options, it does NOT direct, authorize, or encourage police departments to acquire additional surveillance tech.</p>					

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27	i don't think it's acceptable to track people without their knowledge and I think it'd be a waste of funds that could go into supporting the community better		I don't.		Consider the people. y'all already have a bad relationship w/the people this would make it worse.		
28	This is a waste of taxpayer dollars, is the opposite of living in a "land of the free," is rife for abuse, and violates citizens privacy		Less than none		This will decrease investments in the city from domestic and international companies who don't want their rights and privacy violated indiscriminately		

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29	<p>I dont think this is a good use of taxpayer money and I think it's a gross violation of my civil rights. Having an item placed on a car without the driver's knowledge or consent feels like entrapment and makes me feel as though my local police have nefarious motives. I don't see a world in which placing a tracker on a car is going to prevent police from giving chase if that car flees- I think they will just give chase but have a lower chance of losing the car. Either way it's dangerous, but trackers set a precedent of unmanned surveillance that I'm just not comfortable with as a citizen. It does not make me feel safer and makes me wonder what better uses the money for these could go to.</p>				<p>I would want city leadership to consider the privacy, safety, and trust of the citizens of its city. We're in a weird time in history and I think increased surveillance isn't always the answer.</p>		
30	<p>This is a privacy and safety issue. No one consents to being tracked. Police pursuits are regularly risky to everyone involved and the public. I believe the police can do their job without this technology.</p>		None				

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31	The review process of new policing technologies needs more oversight. This is potentially very dangerous technology	Too much power given to law enforcement in an increasingly fascist administration	For tracking animals, not humans.		Instead of using this tech on civilians, we should be able to track police movements around the city. At all times.	Don't allow SPD to incorporate new surveillance tech like this without robust civilian and city oversight	
32	Misuse of funds that could be allocated to better things. Long history of SPD frightening misuse of technology to illegally spy for personal reasons, ex girlfriends, wives, domestic violence victims. Do not allow this.	Absolutely no to Covert Trackers and Pursuit Mitigation Tracker. Remote tracking, like covert trackers, increase the number of people being tracked by police because the barriers to the police using them are so low. Mass surveillance is not safety it's a gross overstep of police power and will drag in innocent citizens.	None currently. The spd already has the largest budget of any department in the city. They have more than enough to work with currently. If they cannot do their jobs with current funding, I honestly question their ability to do their jobs at all.		The SPD has so much money and technology at their disposal currently. How can they possibly justify more funding at this time to possibly be mis handled and used to surveil innocent law abiding citizens. Its already shown a history of doing so.		

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33	Privacy, abuse of power, a slippery slope for a hyper surveillance state that doesn't actually protect people. It protects assets of the state. The judgement that police officers make in pursuits have led to a lot of harm than good.		None.	Nope. Don't approve of this.	Think about the lack of ethics when technology is used in policing. There are no guardrails with even existing technology around surveillance and it hasn't even held police officers accountable to their constant overreach or when they've endangered people.	Consider REAL solutions that curb crime like affordable housing, living wages, affordable food, accessible transit, free/affordable healthcare, free/affordable schooling... When people's material needs are met, there is less inclination to commit crimes.	
34	SPD is a department with a long history of abusing technology and power for nefarious purposes.	This is a terrible idea. They are rushing the approval process. whatever benefit it MIGHT provide (and the jury is VERY out on that) is overwhelmed by its potential for abuse.	Aside from increasing the surveillance state? NONE	Stop throwing money at this terrible department. Spend it on the homeless instead		Look at the record of this department when it come to creepy abuse of power!	Spend the money on folks that need it,

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35	SPD has a record of racial discrimination and violations of civil rights. We have the right to be free of invasive surveillance, and the allowed justifications for use of these technologies are incredibly broad.	No.	None at all.	No.	Our civil rights, the current political climate trend towards authoritarianism and government overreach, and SPDs long history of civil rights violations.	No.	No.
36	Misuse and abuse of the technology. The waste of tax payer money to fund and implement this. No support showing this technology would actually improve SPD's ability to keep civilians safe.		None.		SPD's long track record of abuse of power and funds. This technology would disproportionately hurt marginalized groups within our community.		I urge you to not approve the implementation of this technology.
37	Police misuse and disproportionate harm to BIPOC community just as we see in other police incidents		None		Actually hold a vote for use of tax dollars!	More studies that are impartial	
38	SPD has proven time and time again that they can't be trusted to responsibly use technology like this. Please do not approve.		None. Warrants are needed to track members of the public—random officers should not have access to these trackers.		Do not approve.		

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39	<p>Police are known to be more violent and aggressive to strangers and family than the average person by several degrees of magnitude. Giving them free rein to stalk and harass any woman and any person they like without the accountability of a warrant seeking process is going to enable abuse. Seattle PD in particular is exceptionally untrustworthy with surveillance and good judgement and has a long history of abusing their privileges to stalk women and kill women.</p> <p>Giving a group known to be full of abusers and stalkers more tools to stalk and harass women is a form of Boleyn r against your constituents I don't know how you can justify. Have some decency and stop rolling over to hand money over to a government entity that's had open DOJ investigations longer in tenure than most of you council members have been alive.</p> <p>This is extremely cowardly and irresponsible.</p>		<p>This will provide the police with even more institutional support to harass and assault women with cover of the city council. How many dead grad students do you need splattered across Capitol Hill before you have the common sense to stop this before it even comes up a vote?</p> <p>You should be ashamed of this. It should make you sick of yourselves.</p>	<p>I want to know how council members will stand to personally profit from this and after filling out this form that's what I'll look into next.</p>	<p>How many more women would you like to see dead at the hands of spd? Because this will empower these predators to escalate the existing culture of harassment and her blood will be on your hands.</p>		

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40	The barrier to using this technology is too low. The police do not need to be surveilling anyone in this manner.	The SPD does not have the trust of their community. They have used their power and force in unreasonable ways	None		That it's going to be too easy for the police to track anyone and everyone for any reason they deem fit.		
41	I do not trust these technologies in the hands of SPD or any state force.		None.		That money should be used to fund state workers, educators, and support public housing.	What could be better used with that money and build trust in our communities: investment in our wellbeing.	
42	I do not support this technology. The money for this would be better fit for affordable housing.		None		This is not what money should be spent on		

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43	<p>I'm concerned that this technology will be abused, particularly without consent for Covert Trackers. This is a breach of privacy. In situations where such technology is abused, I imagine SPD officers can use it on anyone (e.g. ex-romantic partners) for non-professional reasons. As someone who has dealt with a stalker, this causes feelings of fear, not safety.</p> <p>Pursuit Mitigation Trackers are also another form of technology that can be easily abused. 'Reasonable suspicion' to use such technology on a suspect is too subjective. Due to human and systemic biases, the chance is too great that the suspect is innocent, and that funds would be wasted on projectiles.</p> <p>More than anything, these forms of technology do not make me feel safer.</p>		To stalk people		Such forms of technology only exacerbates public fear, rather than making people feel safer.		

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44	<p>I have major concerns about and oppose the use of this technology.</p> <p>Covert Trackers Covert Trackers – GPS trackers SPD installs as part of an investigation without the vehicle owner’s knowledge. Covert trackers require either a court order/warrant or “consent” to be installed.</p> <p>As the ACLU pointed out in its June 2, 2022 comments on group 4b surveillance technologies (page 94), it is highly unlikely a person can legitimately consent to SPD placing a tracking device due to the power imbalance between SPD and the person. This difference in power means any request by SPD is naturally coercive/comes with a threat making a consent illegitimate. Remote tracking, like covert trackers, increase the number of people being tracked by police because the barriers to the police using them are so low. Police are free to assign officers to follow/surveil someone, we’ve all seen this in various movies. Having officers follow/surveil someone is very resource intensive which limits the number of people the police can subject to such invasive surveillance creating some protection against mass</p>	<p>Pursuit Mitigation Trackers (aka StarChase) Pursuit Mitigation Trackers – Are projectiles with GPS trackers that police shoot at cars SPD wants to acquire and be able to use these trackers any time there’s “reasonable suspicion” a vehicle was involved in a crime or if a cop thinks a car “may flee” a traffic stop. This is absurdly broad. “Reasonable suspicion” is an incredibly low threshold, cops have claimed things like averting eye contact or shaking hands are reasonable suspicion. And, “may flee” is even lower, it is a cop guessing what might happen. SPD has not provided any data</p>	<p>Absolutely none.</p>		<p>Both Technologies Both technologies share the issue of SPD’s history of misusing police systems to spy on people. SPD cops have been caught misusing systems including to stalk an ex-girlfriend, dig into their wife & her friends histories, share information about a domestic violence investigation, and break HIPAA laws & share health information. Even the OPA has misused data and broken HIPAA laws.</p>		

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		<p>practicable after initiating a vehicular pursuit, the pursuing officer, supervising officer, if applicable, or responsible agency shall develop a plan to end the pursuit through the use of available pursuit intervention options, such as the use of the pursuit intervention technique, deployment of spike strips or other tire deflation devices, or other department authorized pursuit intervention tactics; and”</p>					

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45	<p>My primary concern is that SPD has a history of lack of any real accountability. The use of this technology gives officers yet another way to covertly monitor citizens. Given the blatant lawless behavior of SPD within the recent past (~5years), it seems ridiculous to give them additional access to things like covert trackers.</p>				<p>I would caution city leadership about the risks of misuse. This is just waiting for additional monitoring of people unrelated to crime. For example: an officers ex wife</p>		

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46	<p>Oh my god so many! What on earth does - reason to believe someone may flee a traffic stop - mean?? It's a traffic stop..... Now we're tracking cars? That MAY flee? Excuse me? I'm concerned about the wide-openness of this proposal, the absolute lack of consideration for all the other actually useful things this money could be spent on, the disregard for people's privacy. I'm concerned about the mental cognition of city council to even suggest this. Are you all ok???</p>		Absolutely none.		<p>Literally all the other things the City could be spending this money on, and all the other ways that are PROVEN to keep communities safe and create material safety. Including, but not at all limited to - funding secure housing, food access, universal healthcare and childcare, education and schools, literally the list goes on. I would love City leadership to consider defunding the police and prisons, consider DECREASING the ways we can find to punish people, and consider... not passing this... and stop this kind of wild obsession with surveillance technology.</p>		Just why? Why on earth is this being proposed in the first place?

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47	<p>First of all, members of the public cannot consent to covert trackers because the very clear, obvious power imbalance between police and members of the public carries implied coercion. Freely given consent is impossible. Secondly, justification for use of pursuit mitigation trackers is ridiculously and dangerously broad - "reasonable suspicion" is an incredibly low barrier to use and "may flee" is a low standard subject to interpretation and abuse. Use of pursuit mitigation trackers also places a heavy, undue burden on members of the public who may see something fired at their car and panic or not know what happened. In this way, use of the pursuit mitigation trackers might incite the very conditions meant to qualify their use. The high likelihood of trackers being fired and hitting a different car than intended, with their battery life of 8 hours, means a serious risk of unjustified surveillance, pursuit, and danger of someone uninvolved with the suspected or alleged crime, and a violation of their rights. Additionally, the impact assessment SPD performed on pursuit mitigation trackers did not show ANY</p>		None.		<p>Demonstration of evidence of its benefit. The very real impairment of the rights of members of the public to not live under surveillance. The history of SPD's abuse of power. The waste of taxpayer dollars on useless and unproven technology that puts the city, with its budget shortfall that has threatened to close essential life-giving services such as summer camps for disabled children, at the risk of expensive lawsuits for improper, harmful, and unjustified use of this technology.</p>		

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	<p>evidence that use of pursuit mitigation trackers actually reduce pursuit frequency, duration, or speed. The killing of Jaahnavi Kandula and public reporting on SPD's routine abuse of power to speed at lethal speeds without justification should not become an excuse for taxpayer dollars to be used to expand unnecessary surveillance. The attempt to purchase new surveillance technology based on an incorrect citation of the revised code of Washington— 10.116.060.2.d directs police departments to end pursuit as soon as possible and does not direct, authorize, or encourage police departments to purchase or expand surveillance technology— gives me alarm, distrust, and suspicion and does not make me feel trusting or confident of the police departments and officers involved.</p>						
48	<p>The low bar of reasonable suspicion combined with the history of SPD misuse of technology, the ease of misuse, and the lack of evidence that pursuits decrease with use of trackers</p>		None		<p>The danger that surveillance tools can have and the ability to misuse the technology</p>		

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49	<p>All of the suggested trackers and related technology give way too much power to SPD to track any given driver/vehicle without the knowledge and consent of the driver. As the ACLU pointed out in its June 2, 2022 comments on group 4b surveillance technologies (page 94), it is highly unlikely a person can legitimately consent to SPD placing a tracking device due to the power imbalance between SPD and the person. This difference in power means any request by SPD is naturally coercive/comes with a threat, making a consent illegitimate. Furthermore, a report from The Pew Charitable Trusts concluded that remote tracking, like covert trackers, increase the number of people being tracked by police because the barriers to the police using them are so low. Lastly, SPD has not provided any data showing that pursuit mitigation trackers actually reduce the number of pursuits. The Pursuit Technology Impact Assessment that SPD references did not examine whether or not these trackers reduce the number of pursuits, the duration of pursuits, or the speed of pursuits. The biggest pursuit mitigation tracker company, StarChase,</p>		Absolutely none.		What reputable evidence do you have that this will increase the safety of the general public in Seattle?		

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	<p>has been around for almost 20 years which is more than enough time to study whether these trackers actually reduce pursuits.</p>						
50	<p>This level of surveillance tech is far too easy to abuse. Inappropriate use of surveillance tech by police to stalk and intimidate civilians extrajudicially is already a problem- this will make it far easier to do so.</p>				<p>Private citizens' right to privacy and to have freedom of movement without additional layers of surveillance forced on us.</p>		

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51	<p>Both technologies represent an over extension of appropriate policing tooling and techniques. There is little to no evidence demonstrating how they will solve for the undefined problems or what the success metric even is - what is the criteria to allow this? At what point is it scrapped?</p> <p>It promotes "lazy policing" where we simply violate privacies because of a "hunch". The bar is incredibly low to access these, and it essentially takes a "this person is a white male around 6'" description and let's cops track any white male who is around 6'. This sounds absurd, but this is the power being provided. We have already seen numerous scenarios where tools are actually harming investigations as they're triggering false positives. Too much data is not always a good thing.</p> <p>These technologies have shown to be actively harmful with cops chasing down a car... that was the wrong car... at 100mph. And there is a known history of the abuse of power to spy on people. SPD cops have been caught misusing systems including to stalk an ex-girlfriend, dig into their wife & her friends histories, share</p>		No value	<ol style="list-style-type: none"> 1. What is the threshold for allowed power handed to cops <ol style="list-style-type: none"> 1.a. How is this being defined, tracked 1.b. What is the plan to regulate this? Will this be removed as an option? 2. Who regulates this technology? This should be a 3rd party such as an auditor. 3. This technology should be removable from any policing toolkit. 4. What is the justification to allow this? What data points are looking to be solved? How do you know that this is the solution 5. What is the problem statement? Is it an actual problem? What are the underlying causes? What other solutions exist within existing toolkit? How are they being utilized to solve for 	The known discrimination of cops, history of abuse of technologies, the lack of enforcement of regulations and the known abuse of subsequent power, and to consider success metrics from previous allowances, a deep evaluation of the problem and the questions listed above		

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	<p>information about a domestic violence investigation, and break HIPAA laws & share health information. The known discrimination of cops will only empower them to further attack marginalized people.</p>						

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52	<p>SPD wants to acquire and be able to use these trackers any time there's "reasonable suspicion" a vehicle was involved in a crime or if a cop thinks a car "may flee" a traffic stop. This is absurdly broad. "Reasonable suspicion" is an incredibly low threshold, cops have claimed things like averting eye contact or shaking hands are reasonable suspicion. And, "may flee" is even lower, it is a cop guessing what might happen.</p> <p>The current battery life of these trackers is 8 hours which opens the door for police to misuse them to spy on people based on the incredibly low bar of "reasonable suspicion"</p>	<p>Both technologies share the issue of SPD's history of misusing police systems to spy on people. SPD cops have been caught misusing systems including to stalk an ex-girlfriend, dig into their wife & her friends histories, share information about a domestic violence investigation, and break HIPAA laws & share health information. Even the OPA has misused data and broken HIPAA laws.</p>	none	no	<p>SPD's reference to RCW 10.116.060.2.d in the material update is incredibly mis-leading. The RCW directs police departments to end each individual pursuit as soon as possible based on available options, it does NOT direct, authorize, or encourage police departments to acquire additional surveillance technology.</p>	<p>SPD pursues who it wants to regardless of policy or technology. To put it another way, cops don't become cops to not engage in high speed pursuits. Some examples:</p> <p>SPD pursued a vehicle that was being tracked via GPS into a crowded park & off a pedestrian bridge even though the vehicle was equipped with Onstar which was tracking the vehicle for SPD & offered to remotely shut down the vehicle.</p> <p>SPD pursued a vehicle running stop signs and red lights despite being told by their superior to stop</p> <p>SPD continuing a pursuit despite being order to stop, again SPD driving 3x</p>	<p>SPD has not provided any data showing that pursuit mitigation trackers actually reduce the number of pursuits. The Pursuit Technology Impact Assessment that SPD references did not examine whether or not these trackers reduce the number of pursuits, the duration of pursuits, or the speed of pursuits.</p>

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						the speed limit and running red lights without authorization for a pursuit SPD invented probable cause to chase the wrong car at 100 mph through South Seattle	
53	This is extravagant and unnecessary. We should not be spending money or time on fortifying tbd surveillance capabilities of spd or anyone.	This is not the world we want to build. Go read 1984 or watch a Black mirror episode, whatever will convince you.	It only serves fascism! There is no value for the community.		Our funds could be better spent in so many other places - education, housing / support for unhoused folks, road repair.	The people don't want it. LISTEN TO US, you're supposed to work for us.	Do the right thing.

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54	This technology is a blatant overreach/abuse of power, violation of privacy and will be used to perpetuate systemic racism, endangering innocent citizens based on the judgement of solely the bias of an officer and not on an actual fact or evidence.	Yes I worry about the unconstitutional and unethical precedent this would set regarding a citizen's right to privacy and due process before judgement.	Absolutely none.	N/a	The consequences of their actions on society and democracy as a whole, as well as the impact to the daily lives of everyday Americans. This is only to stoke fear and to further the corruption of an already corrupt and obsolete agency.	Leadership should consider spending the excessive amount of money they wish to throw at surveillance technology and invest it into the community, as well as our deteriorating roads and infrastructure.	N/a
55	I have concerns about this tech! Tracking tech does not keep us safer. It targets people more than helps. It strengthens a surveillance state that gets co-opted to target immigrants, to target people coming to Washington for reproductive health care, etc. we can reduce violence and crime by building stronger healthier communities by attending to needs people have and building relationships, not by continuing to militarize our police.		I don't. I don't want it. As a long time seattle resident and homeowner and community member, as UW employee, and a woman, I don't feel this tech will make a better safer Seattle.		Please don't invest in tech that continues to surveil and criminalize, leading more people into an already overcrowded and traumatic jail system. Invest in community programs! Invest in housing! Invest in public transit and health care and food banks! Invest in de escalation trainings!		

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56	<p>This technology will be used to violate civil rights and widen the already unethical imbalance of power the police hold in this city. This technology is unproven and on its basis, explicitly intends to violate the right to privacy of the constituency. Cops are not superheroes and do not need superpowers to do their jobs. They are public servants, and should be serving their communities, not wasting taxpayer money on toys they will only use to abuse. We have more than enough precedent and evidence to show that SPD cannot be trusted with this tech, as there are still members of the force under investigation for violations like stalking, racism, and domestic abuse using the technology already at their disposal.</p>		<p>Racist profiling and abuse of power, which seem to be among of the few values SPD holds.</p>		<p>This tech will be used to violate the laws and liberties that protect your constituency. It would be in the City leaderships interest to avoid further lawsuits against SPD, and to protect and serve the citizens they have been elected by. Supporting this tech is supporting racism, abuse of power, and violence against innocents.</p>	<p>Look at the world we live in. You will also have to answer for your actions someday. Do you want this to be one of them?</p>	

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57	Broad use of this technology will erode the rights of Seattleites to travel freely without surveillance or obstruction.	I don't think the Seattle police department has a trustworthy enough record when it comes to surveillance of its citizens. This is police over reach.	Only value is to prop up the militarized police state. Invest in human services, mental health services, addiction services and homes for the unhoused instead. Our city deserves better than this.	The only value of this technology is in creating an ever more militarized police force that is untrusting of the citizens they are supposedly there to protect. The Seattle police don't even handle violent crimes appropriately and they want us to give them the opportunity to track us? No thank you.	Implicit bias in Americans has been shown to mean that people who live on the margins of society and those who are most vulnerable end up bearing the brunt of this burden. We cannot trust these officers to have this kind of power		
58	Abuse of civil rights and misuse and abuse by police		No value		History of abuse of technology and overreach by SPD combined with lack of evidence for the value of these technologies		
59	This technology increases surveillance and unwarranted tracking, which historically adversely affects Black and Brown communities. It allows officers to use their own biased judgement to track people, and there have been cases of officers using such judgement against their superiors' orders.	This technology is a dangerous step forward into surveillance fascism. Allowing police to use such tracking technology opens the door for terror organizations such as ICE to do the same.	None		Consider people's right to privacy and life without surveillance. Consider how any increase in police technology inevitably causes more violence and aggression towards Black and Brown people.		

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60	I do not trust the Seattle Police department to use tracking technology responsibly, especially during a time when any form of protest is increasingly criminalized.		I can imagine some, but it is not worth the cost/risk.		Using the budget on housing.		
61	I strongly oppose the purchase and use of tracking devices by SPD. Police have too much discretion on when to use these technologies, and the potential for abuse is too high. Covert trackers will allow for police departments to greatly increase the number of people they subject to surveillance. At a time when surveillance is increasingly being used to attack our society's most targeted groups, SPD should be given less power to surveil and track people, not more.	There are numerous documented cases where SPD personnel have abused their power to spy on people and misuse data. Trusting SPD to use this technology ethically is misguided at best, and at worse, puts people already in danger of SPD "misconduct" in even more peril.	I see no value in spending money on and entrusting this technology to a department that has a long history of abuse and misconduct of their power.		Privacy, ethics, safety, potential for abuse and misuse, the increasingly chilling overreach of federal agencies creating agreements with local police forces to share information in order to target oppressed groups. These tracking devices have NO place, given these terrible risks to public safety and especially those already marginalized groups.		

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62	Incredible abuse of power. SPD have proven time and again the general public's safety is not at the forefront of their concern. With the dramatic authoritarian moves the current US administration is making, the last thing we need is to open the door for more overreach by an already overfunded and harmful agency.		None.		Both technologies share the issue of SPD's history of misusing police systems to spy on people. Consider the direction this is taking policing in our communities.		You should be focusing your time and energy on reallocating funds away from policing and towards community assistance programs. The data is available to you. Supporting communities reduces crime. The government should support its people, not terrorize them.

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63	<p>I am concerned about the cost of these two new pieces of technology and the privacy implications of their use. There is not sufficient evidence of the benefit of these devices to support paying for them.</p> <p>Additionally, the barrier to be allowed to track someone's location is very low. There is little rational and process needed to allow an officer to use these gps trackers.</p> <p>How is the location data transmitted and stored. Is the data encrypted? Is the data stored? Is the data stored - long term, short term, encrypted? Who has access to this data? Can people request for their data to be deleted? Can people request to know if they have ever been tracked by the police? Will there be logging and auditing about the deployment of these devices?</p>				<p>The cost, efficiency, potential for abuse, security of the data, auditing and logging of the data, and the procedures of when the devices should be deployed to be considered by city leadership.</p> <p>I also want city leadership to consider alternatives to these pieces of new technology.</p>		<p>Why was this announced with so little time for public comment?</p>
64	<p>SPD does not need to secretly track people or track cars 8 hours after a traffic stop. This is a violation of our privacy and if SPD can't do their jobs without it then they should get better at their work.</p>		<p>None it's just another surveillance tool abuser cops will use to harm us.</p>		<p>That their constituents deserve privacy and to not be harassed by cops.</p>		<p>Don't pass this bill. Don't give SPD these trackers.</p>

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65	<p>I have many concerns about overreach of power by SPD in the use of these technologies. In the instance of covert trackers, there is no real way for people to consent to their use. Police are trained to talk to citizens in ways that enable them to twist someone's words and claim they had "consent," but in most cases this is not actually consent.</p> <p>An example: Cop: "Do you mind if I install this?" Citizen: "No" (Does this mean, "no, don't install it"? "No, I don't mind"? The cops will always pick the first of these.) OR Citizen: "Yes." (Does this mean, "yes, it's fine" or "yes, I mind if you install it and I don't want you to"?) Once again, cops will always pick the first version, which affirms what they want.)</p> <p>Beyond this, SPD has been consistently shown to overstep and abuse their power, which presents grave concern about the use of the above and pursuit mitigation trackers/StarChase as well.</p> <p>If SPD is empowered to use pursuit mitigation trackers in any case of "reasonable suspicion," we already know racial profiling will be involved. This term is not defined for</p>		<p>Frankly, I don't see value in the use of this technology. There is no study or data to prove that they have made citizens safer. Show me that, and maybe I'll change my mind.</p>		<p>Surveillance culture is extremely dangerous to all citizens. Your job should be to protect the people of your city, not continue padding the police budget for gadgets that will not effectively improve public safety.</p>		<p>I continue to be disappointed by city council decisions that give the police department more power and funding but do not actually address the problems of the city. Solutions have been brought forward that would arise from communities in need -- for example, ways to help our unhoused population that offer them a route towards employment and permanent shelter -- and instead, money gets spent on the police department and other organizations to sweep people's shelters. This is a death sentence for some, and for others a giant setback when they might have been closer to acquiring housing, getting clean, finding</p>

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	<p>a reason -- because police will use any cue (example: "they wouldn't meet my eyes") to suspect someone. Furthermore, firing something at a citizen's car is going to cause confusion, fear, and will escalate a situation. This puts the citizen in danger (SPD can claim they "fled" if they feared they were being shot at, and then they might actually be shot), puts bystanders in danger (just look at all the instances of cops hitting people and endangering people by pursuing chases), and puts officers in danger if they engage in pursuit. There are too many instances to count of police pursuing vehicles through public areas, walking paths, off of bridges, etc.</p> <p>Beyond this, there are numerous documented instances of SPD using their power and other tools at their disposal to stalk people, misuse and break privacy laws such as HIPAA, or otherwise look into someone's private information without consent or lawful reason.</p>						<p>employment, etc. I expect better of the council, and I hope that more humane, community-based decisions are implemented .</p> <p>As far as this relates to tracking devices, the council should spend more time researching and reaching out to the community to find out what measures should be implemented , rather than handing another expensive device over to the police department to misuse.</p>

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66	I see a large possibility for abuse if there is no opportunity provided for informed consent of tracking. I see a large possibility for endangerment of the public with projectile-based GPS trackers with no declaration of intent.		I do not see value in this use of the technology without oversight or informed consent. I do not see the value of tracking technology delivered in a kinetic approach that may confuse members of the public with hostile weapons fire.		I would be very hesitant to grant more tracking technology to SPD without firm data that the use of these technologies would show a reduction in crime or an increase in positive benefit.		
67	both of these technologies have high risk of being used for surveillance. With SPDs history of misuse of technologies like this i do not support the use of this technology as it could lead to the police spying on citizens. it also does not prevent or stop high speed chases which are where most accidents happen. it is not a necessary technology.		none		why they feel the need to be surveilling their citizens rather than supporting programs that would actually help make peoples lives materially better.		

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68	<p>I am concerned with giving SPD any additional ability to surveil the people of Seattle, as they have not demonstrated in the past that they are responsible stewards of sensitive data and technologies. There are many examples of officers misusing surveillance technology to track ex-girlfriends, stalk an ex-girlfriends, dig into their spouse & her friends histories, share information about a domestic violence investigation, and so on.</p>	<p>I am concerned about the process the city is using to consider these powerful technologies. Why only two weeks for public comment and no public hearings? Why is this considered a material update and can circumvent the complete review process?</p>	<p>I don't see any value. It is expensive tech and SPD's claims that "pursuit mitigation" trackers will result in less dangerous police pursuits seems to not be backed by any empirical evidence.</p>	<p>Why do we keep funneling more city funds into police technologies when we could instead by building-up the very popular and effective non-police emergency response parts of the city such as the CARE department?</p>	<p>In this moment of authoritarian federal rule, the technologies we need you to be investing in are: non-police community-based safety, housing, mental health services, food security – not more creepy policing tech.</p>	<p>Show some backbone and just say no to SPD for once. Many of you have already way over-estimated and misunderstood the "public safety mandate" that you believe you were elected with, and you will not survive the next election unless you start understanding and funding public safety that is not police-based. This unnecessary and intrusive tech request from SPD is a great place to start.</p>	
69	<p>SPD has already proven irresponsible with GPS trackers. This will not make law enforcement safer.</p>		<p>This type of surveillance has no meaningful benefit to society.</p>		<p>Look at the facts. This tech has not improved outcomes where it was trialled.</p>		

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70	<p>SPD has not provided any data showing that pursuit mitigation trackers actually reduce the number of pursuits. There should be evidence of this technology benefitting the community, and we have been offered none. Who is fact checking these assumptions? Since we can only assume that pursuit mitigation trackers may decrease the number of pursuits, particularly the ones that end up damaging the community and dehumanizing individuals accused of crime, because there is no data to prove it...hence it not being a fact, only an assumption.</p>		<p>I do not see any value. Only more room for violence, danger and damage to our community.</p>	<p>“Reasonable suspicion” is an incredibly low and broad threshold, left to the individuals who, realistically, are the reason this technology could be being sought out, since they apparently can’t drive. There is actual evidence of SPD officers driving unsafely (with their knees, distracted driving, etc), committing absurd and heinous traffic violations (crashing into other vehicles, unauthorized pursuits, going 77MPH in a 30 MPH zone with no lights on...) How are members of the community supposed to trust that the people who have behaved in the aforementioned ways have the ability to discern what is “reasonable suspicion”?</p>	<p>Does this technology actually make our communities safer, and will it actually do what it is being advertised as doing (i.e decreasing the amount of public pursuits).</p>		

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71	I am extremely concerned about the adoption of these stupid surveillance technologies; they are obviously a waste of money and just another tool for SPD to harass, abuse, intimidate, and harm people here. Stop wasting our resources on this crap and actually support people's lives like through food, housing and healthcare, not greater criminalization by violence abusive police.	Yup, I'd love for cops to not be able to arbitrarily shoot surveillance darts at whatever cars they like!	I'm sure police will have fun shooting them at cars. And it will make the company that makes them richer, and give the cops even more of our city's budget. (this is facetious)		Stop harassing us, the people who actually live here in Seattle, and actually invest in our community rather than greater tools to control and punish us.	SPD has a long, long history of violence, abuse and lack of accountability. Stop giving them resources!	
72	How is it legal to track citizens without a warrant? It seems like an overreach of police authority.	It's a fishing expedition.	I dont		Why would this ever be constitutional without a warrant? It's just a lawsuit waiting to happen		

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73	Unnecessary surveillance and violation of privacy.	It will 100% be used with a racial bias.	Absolutely none.	I cannot believe we're wasting tax dollars on this when that's literally not the answer to reduce crime. Crime is reduced when proper needs of civilians are met such as affordable housing, health care, and food and water. We should be putting resources into that or universal basic income than unlimited surveillance in a job that only requires 90 hours of training.	We've poured billions of dollars into policing in seattle. If it was gonna work, it would've worked by now. We need to try other avenues.		When are we going to discuss Universal basic income?

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74	<p>I am concerned about the extremely low bar for "suspicious behavior" required to deploy these technologies. I am concerned that, once in place, these trackers can be used beyond the timeframe of a pursuit incident. I am concerned about the imbalance of power in any conversation between SPD officers and citizens that created pressure to consent to installation of a tracking device, and I am concerned about trackers that can be used without due process in "emergency" situations. I am concerned that this technology will encourage high speed chases, and SPDs troubling record of fatal outcomes resulting from high speed chases in which they have been involved.</p>		None.		<p>I would like to tell City Leadership that we have community based programs and resources that are already proven to have good outcomes and that we should invest in those vs unproven technology that further empowers SPD (which is still operating under a federal consent decree) to act with impunity.</p>		
75	<p>This technology will be unfairly used against minority populations and lower income groups.</p>		None		<p>I want them to consider who is really benefiting from this technology and who largely pays the price.</p>		

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76	<p>Covert trackers that the SPD installs are done so without the owners consent. I am concerned about increase in surveillance technology in general, but especially among the SPD who have a history of misusing police systems to spy on people. SPD cops have been caught misusing systems including to stalk an ex-girlfriend, dig into their wife & her friends histories, share information about a domestic violence investigation, and break HIPAA laws & share health information. Even the OPA has misused data and broken HIPAA laws.</p>		<p>Until the SPD gets rid of their guilds and have better systems of holding police officers accountable, I don't see any value in giving them more surveillance power.</p>		<p>Accountability systems to the misuse of tools already available to the SPD. And the role police guilds play in protecting officers from the consequences of this misuse of power.</p>		

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77	This technology serves to increase policing and surveillance rather than improving the lives of Seattlites. It allows SPD to react to bias and prejudice to make the decision of whether someone is "likely to flee a traffic stop." We don't need this, surveillance is fascist, this isn't Seattle.				You represent the people, not the wealthy's property.		

2025 Surveillance Impact Report Executive Overview

Tracking Devices

Seattle Police Department

Surveillance Impact Report Versions:

- 2022 Surveillance Impact Report: Seattle Police Department Tracking Devices adopted by [Ordinance 126776](#) on 2/28/2023.
- 2025 Surveillance Impact Report: Seattle Police Department Tracking Devices

Overview

The Operational Policy statements in this document represent the only allowable uses of the equipment and data collected by this technology.

The purpose of this Executive Summary is to highlight policies, technology and practices regarding the surveillance technologies under Council review. This document outlines information, including policies and practices, about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. All information provided here is contained in the body of the full SIR document but is provided in a condensed format for easier access and consideration.

1.0 Purpose

Seattle Police Department (SPD) utilizes geolocation trackers to track and locate vehicle information during criminal investigations. Geolocation trackers are devices that SPD utilizes as a tool to locate and track the movements and locations of vehicles. Trackers are utilized only after obtaining legal authority via a court order or consent, and once the consent or terms of the order have expired all data collected is maintained only in the investigation file.

A category of GPS trackers (police pursuit management technology) is utilized to tag and track fleeing vehicles as a safer alternative to vehicle pursuits. In accordance with RCW 10.116.060.2.d, which requires agencies to “develop a plan to end the pursuit through the use of available pursuit intervention options,” this specialized GPS tracker allows SPD to track the precise location of a vehicle for which probable cause or reasonable suspicion of involvement in a crime has been established and accomplish the task of recovery or arrest without the need for initiating or continuing a vehicle pursuit.

Tracker technology directly tracks and collects location information of vehicles, and indirectly tracks and collects the same information about individuals. Despite the requirement that trackers be utilized only pursuant to a search warrant or with consent, this could raise potential privacy concerns, such as general surveillance or tracking of the general public.

GPS pursuit mitigation trackers also directly track and collect location information of vehicles and, indirectly, their occupants. While this technology is limited by policy to vehicles for which there is reasonable suspicion or probable cause, they could raise potential privacy concerns, such as general surveillance or tracking of the general public.

2.0 Data Collection and Use

Covert tracking technology consists of interconnected hardware and software. The hardware, a real-time tracking and data logger, is a compact unit that adheres to or rides along with a targeted vehicle. These trackers are location tracking devices that report latitude and longitude coordinates on a pre-determined schedule that can be adjusted by users remotely. The hardware also logs high temperature alerts, low battery alerts, device removal, power/shut down alerts and battery level. The software consists of an online portal that collects the information captured by the hardware, and allows for graphic representation of that information, including mapping of locations and movement, alerts for established events (i.e., a

vehicle has moved beyond an established boundary, etc.), and scheduling of “check-ins” (the reporting interval records the locations set in seconds, minutes or hours).

The data captured by a device is downloaded out of the online portal after the conclusion of a tracking schedule (due to the expiration of a search warrant or an investigation) and is provided to the Officer/Detective leading the investigation. The data is then purged from the software and the hardware is reset for future deployment, meaning no data captured is stored in any location other than the investigation file. This is in keeping with Washington State Retention Schedule for Records Documented as Part of More Formalized Records ([GS2016-009](#)). It requires that such records be retained “until verification of successful conversion/keying/transcription then destroy.”

In the beginning of 2020, cellular providers in the USA announced that the existing 3G cell networks would be decommissioned in 2022 as the newer 5G networks were phased in. Many of the existing SPD tracking devices were tied to the older 3G network and have been or will need to be replaced with similar-functioning updated 5G versions of the same location tracking technology.

Officers/Detectives obtain search warrants or consent to deploy vehicle tracking devices. The information is gathered consistent with [SPD Policy 6.060](#), such that it does not reasonably infringe upon “individual rights, liberties, and freedoms guaranteed by the Constitution of the United States and the State of Washington, including freedom of speech, press, association, and assembly; liberty of conscience the exercise of religion; the right to petition government for redress of grievances; and the right to privacy.”

Vehicle tracking data is temporarily stored by third-party vendors (as described above), until the schedule for collection of data has expired (per the search warrant or consent authorities), at which time all data collected is downloaded and attached to the investigation file. This is in keeping with the [Washington State Local Government Common Records Retention Schedule](#) Disposition Authority Number GS2016-009 Rev. 0, governing retention of records documented as part of more formalized records, and requiring that SPD “retain until verification of successful conversion/keying/transcription, then destroy.”

Physical objects involved in covert tracking deployments are unmarked as their purpose is in support of covert investigations.

In the case of GPS pursuit mitigation trackers, the GPS launcher deploys a GPS tracking tag onto a suspect vehicle. Once the GPS tag is attached to the vehicle, it communicates positional data to a mapping platform in real time. Law enforcement can then plan and coordinate an informed tactical response to make a safe arrest while maintaining community and officer safety. It is important to note that the GPS tag has a limited battery life (approximately 8 hours), preventing the possibility of long-term surveillance.

3.0 Data Minimization & Limitations

Each application of covert tracking technology is screened by the TESU supervisor and held to a legal standard of consent or court issued search warrant. The process is as follows: one member of the Unit is tasked with receiving requests for deployment (including a Request Form that must be completed by the requesting Officer/Detective, which includes the active search warrant number). A TESU supervisor then approves the request before a tracking device is assigned and deployed to an investigating Officer/Detective. All requests are filed with TESU and maintained within the unit, available for audit.

Equipment deployment is constrained to the conditions stipulated by the consent or court order providing the legal authority. All deployments of tracking technology are documented and subject to audit by the Office of Inspector General and Federal Monitor at any time.

Data collected is provided to the case Detective for the investigation and no data is retained by the Technical and Electronic Support Unit.

Prior to deployment of GPS pursuit mitigation trackers, officers must establish reasonable suspicion or probable cause for the stop of a vehicle. At that point, officers will have the discretion to deploy the GPS pursuit mitigation trackers if it appears the vehicle may flee. Additionally, if an officer engages in a pursuit with a vehicle, they can deploy a tracker and terminate the pursuit, relying on the tracker to follow the vehicle.

4.0 Access & Security

Access

Only authorized SPD users can access the vehicle tracking devices or the data while it resides in the system. Access to the vehicle tracking systems/technology is specific to system and password-protected.

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

All SPD employees are backgrounded and access is controlled by SPD Manual Title 12 provisions governing Department Information Systems including [SPD Policy 12.040](#) - Department-Owned Computers, Devices & Software, [SPD Policy 12.050](#) - Criminal Justice Information Systems, [SPD Policy 12.080](#) – Department Records Access, Inspection & Dissemination, [SPD Policy 12.110](#) – Use of Department E-mail & Internet Systems, and [SPD Policy 12.111](#) – Use of Cloud Storage Services. Unit supervisors are responsible for screening all deployments as well as ensuring that staff receive adequate training specific to the involved technologies.

TESU personnel are trained by the vendor in the use of the hardware and software. When an Officer/Detective requests and deploys a tracking device from TESU, TESU personnel train the Officer/Detective in the tracker's use.

If the geolocation tracking device is being utilized pursuant to a search warrant, the warrant dictates the scope and parameters of the information collected.

Data collected by the deployment of a GPS pursuit mitigation tracker is used by SPD personnel to track and locate vehicles for which there is probable cause or reasonable suspicions. These personnel may be patrol, investigations, or RTCC staff capable of broadcasting tracking information to responding units. OIG personnel will also have access for audit purposes.

Patrol Supervisors will monitor the deployment of GPS pursuit mitigations trackers. The use of GPS pursuit mitigation trackers will be documented in the incident/offense report.

[SPD Policy 6.060](#) requires that “information will be gathered and recorded in a manner that does not unreasonably infringe upon: individual rights, liberties, and freedoms guaranteed by the Constitution of the United States and the State of Washington, including freedom of speech, press, association, and assembly; liberty of conscience; the exercise of religion; the right to petition government for redress of grievances; and the right to privacy.”

Security

Data is securely stored by the vehicle tracking technology vendor and will be transferred to the case investigator only via Seattle Police Department owned and authorized technology. At that time, vehicle tracking data collected by the tracking device is downloaded from the vendor software and resides only with the investigation file.

5.0 Data Sharing and Accuracy

No person, outside of SPD, has direct access to the tracking units or the data.

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

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

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

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

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

Discrete pieces of data collected by these tracking devices 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 executed research and confidentiality agreements as provided by [SPD Policy 12.055](#). This sharing may include discrete pieces of data related to specific investigative files collected by the devices. 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 investigation, and to comply with legal requirements.

GPS pursuit mitigation tracking data will be shared with neighboring law enforcement agencies as needed for operational purposes. As tracked vehicles leave the City limits, it will become necessary for partner law enforcement agencies to have the tracking information to assist with tracking and apprehension. Conversely, other agencies using GPS pursuit mitigation tracking systems may need to share their tracking information with SPD as their tracked vehicles enter the City limits.

As the GPS pursuit mitigation tracking data is included in SPD police reports, the above listed agencies will also have access via investigative files.

6.0 Data Retention

[SPD Policy 7.010](#) governs the submission of evidence and requires that all collected evidence be documented in a General Offense (GO) Report.

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

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

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

SPD's Intelligence and Analysis Section reviews the audit logs and ensures compliance with all regulations and requirements.

Audit, Policy & Research Section personnel can also conduct audits of all data collection software and systems. Additionally, any appropriate auditor, including the Office of

Inspector General and the federal monitor can audit for compliance at any time.

RTCC System Administrators will manage the GPS pursuit mitigation tracking system to ensure that the retention requirements meet those of SPD.