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Amendment B to CB 121052 Material Update to RTCC Policies

Sponsor: Councilmember Rinck

Evaluation Requirements

Effect: This amendment would require the Office of the Inspector General for Public Safety (OIG) to ensure that any evaluation plan of the Real Time Crime Center (RTCC) and Closed-Circuit Television (CCTV) pilot projects examines the following five components:

1. Examination of impacts on calls for service, police actions, and criminal incidents;
2. Examination of impacts on individuals involved police actions, criminal incidents, and cases assisted by the RTCC;
3. Examination of impacts on case clearance and investigative outcomes;
4. Process analysis of RTCC implementation and operations; and
5. Exploration of community perceptions.

Additionally, the evaluation plan should incorporate a methodology that utilizes control group areas and a quasi-experimental design to determine if CCTV, when used in combination with the RTCC, is associated with a reduction in violent crime, human trafficking or persistent felony crime.

If the evaluation does not show that use of CCTV is associated with a reduction in any or all of these things, then the Executive would need to consider, in compliance with the Surveillance Impact Report (SIR) policies, discontinuing the pilot project.

This amendment would also attach to the ordinance the following documents:

1. 2025 SOCR Policy Memo re: CB 121052 and CB 121053.
2. 2025 CPC Letter to Council from PPWG – Regarding Expansion of the Surveillance Pilot

Background: OIG staff have provided to Central Staff a draft of an evaluation plan that has been created by the University of Pennsylvania's (UPenn) Crime and Justice Policy Lab. This plan will likely serve as the basis for a contract that is currently under development.

The evaluation plan incorporates all of the above components, including a methodology that utilizes control group areas and a quasi-experimental design to determine if CCTV, when used in combination with the RTCC, is associated with a reduction in criminal activities.

UPenn researchers have reviewed this amendment and have indicated that it is consistent with the current evaluation plan. Additionally, this amendment will not limit their ability to incorporate additional evaluative components in the final contract, if desired.

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1. Add a new Section 3 as follows and renumber subsequent sections:

Section 3. The Office of the Inspector General for Public Safety (OIG) shall ensure that any evaluation plan of the CCTV and RTCC pilot projects examines the following five components:

A. Impacts on calls for service, police actions, and criminal incidents;

B. Impacts on individuals involved police actions, criminal incidents, and cases assisted by the RTCC;

C. Impacts on case clearance and investigative outcomes;

D. Process analysis of RTCC implementation and operations; and

E. Exploration of community perceptions.

Additionally, the evaluation plan shall reflect a methodology that utilizes control group areas and a quasi-experimental design to determine if CCTV, when used in combination with the RTCC, is associated with a reduction in violent crime, human trafficking, or persistent felony crime. If the evaluation does not show that CCTV is associated with a reduction in any or all of them, then the Executive shall, in compliance with the SIR policies in Section 1.1 and 2.2, consider discontinuing the pilot project.

2. Attach the following documents to CB 121052, as amended, as follows:

Attachment 1– 2025 SOCR Policy Memo re: CB 121052 and CB 121053.

Attachment 2 – 2025 CPC Letter to Council from PPWG – Regarding Expansion of the Surveillance Pilot

Seattle
Office for Civil Rights

Policy Briefing Memo

Date: August 28, 2025
To: Councilmember Alexis Mercedes Rinck
From: Director Derrick Wheeler-Smith, Dr. Hajer Al-Faham, Ph.D.[1]
Subject: Council Bill (CB) 121052 and Council Bill (CB) 121053

PURPOSE

The purpose of this memo is to review the core provisions of Council Bill 121052 and Council Bill 121053 for the effectiveness of proposed surveillance technologies and the implications for civil rights, civil liberties, and equity. The Seattle Office for Civil Rights (SOCR) safeguards civil rights and promotes equal opportunity by enforcing anti-discrimination laws, leading civil rights research and policy development, and advancing civic engagement and equity across the City of Seattle.

EXECUTIVE SUMMARY

Council Bill 121052 and Council Bill 121053 propose expanding the Seattle Police Department's (SPD) piloted use of Closed-Circuit Television Camera Systems (CCTV) and Real-Time Crime Center (RTCC) surveillance technologies.[2] CB 121052 would expand SPD's placement of CCTV cameras into new areas of the city, while CB 121053 would authorize the integration of footage from the Seattle Department of Transportation's (SDOT) traffic monitoring cameras into SPD's RTCC.[3] SOCR previously analyzed the proposed pilots of these technologies in 2024. The pilots were authorized by CB 120844 and CB 120845 in 2024, and any expansion of these pilots is subject to the requirements of Seattle's Surveillance Ordinance 125376. This ordinance states that surveillance technologies should be carefully evaluated to balance potential criminal legal system benefits with strong protections for civil rights and liberties and safeguards against disparate impacts on racially and socioeconomically marginalized communities.[4]

Based on our analysis of scientific research evidence and the broader implications for civil rights, civil liberties, and equity, SOCR advises against the adoption of CB 121052 and CB 121053. Research has not demonstrated that surveillance technologies reduce "persistent felony crimes," "serious and violent crimes," or "gun violence and human trafficking." The categories of crime these tools are said to address are described inconsistently and ambiguously in the proposed bills, 2025 Executive Overviews, and the 2025 Surveillance Impact Reports (SIRs).[5] In contrast, a significant literature in law as well as the social and behavioral sciences shows that surveillance technologies can discourage civic engagement, weaken constitutional protections, and reinforce inequitable

[1] Excellent research support was provided by Jaclyn Tsiang, Damon Agnos, and Daisy Jaimez.
[2] CCTV consists of cameras placed in public to both record and provide a constant live feed to SPD. RTCC is software that enables SPD to collect all its information streams (e.g. CCTV feeds, dispatch and officer location info, 911 calls, Automated License Plate Reader data, records management systems) into one program.
[3] The 2024 legislation limited the deployment of CCTV cameras to locations in the Crime Prevention Technology pilot project: Aurora Avenue North, downtown in areas along and adjacent to the Third Avenue corridor, and the Chinatown International District. The three proposed locations where CCTV cameras will be added under the 2025 legislation are the Stadium District, the area around Garfield High School, and the Capitol Hill Nightlife District. While the 2024 legislation approved the integration of the CCTV cameras data into SPD's RTCC, the proposed 2025 legislation seeks approval to integrate surveillance data from SDOT's traffic management cameras.
[4] To help encourage transparency and accountability, this ordinance not only requires Seattle City Council oversight but also the preparation of a Surveillance Impact Report (SIR) by any city department seeking to acquire and deploy surveillance technology. The full set of expectations established for an SIR are outlined in Ordinance 125376.
[5] For CB 121052, SPD submitted the following supporting materials: 2025 SIR Executive Overview for CCTV and 2025 SIR for CCTV. For CB 121053, SPD submitted the following supporting materials: 2025 SIR Executive Overview for RTCC and 2025 SIR for RTCC.

patterns of policing, monitoring, and enforcement.[6] These harms disproportionately affect communities that are Black, Indigenous, People of Color, low-income, disabled, and 2SLGBTQ+.[7] SOCR's concerns are heightened by the national context, where local surveillance infrastructures that were originally justified in the name of safety, are leveraged by federal agencies in ways that undermine local autonomy, civil rights and liberties, and equity.[8]

Rather than expanding unproven surveillance technologies, SOCR recommends a five-part strategy that includes investing in community-based alternatives and service providers to work alongside SPD and mitigate capacity challenges; robust community engagement that includes revitalizing the Seattle Community Surveillance Working Group (CSWG) to support public awareness of the risks, costs, and scope of surveillance technologies; narrowing CCTV usage and data retention to specified felony crimes; collaborative oversight and evaluation by SOCR and scholars without conflicts of interest; and mandating that pilots are defined by clear goals, terminology, and measurable outcomes.[9]

RESEARCH FINDINGS: SURVEILLANCE TECHNOLOGY & EFFICACY

As described by SPD in the Executive Overviews and SIRs, the purpose of investing in CCTV and RTCC technologies is to offset police operational issues (e.g., limited staff capacity) and enhance police effectiveness (e.g., reduction in 911 calls, improved police response times, crime clearance rates, community satisfaction) by reducing the interchangeably referenced "persistent felony crimes," "serious and violent crimes," and/or "gun violence and human trafficking."[10] While the materials submitted by SPD state that efforts to prevent serious felony crimes have been unsuccessful, SPD's dashboard indicates violent crime citywide has dropped by 17% in 2025 compared to 2022, shootings are down 36%, and homicides are down 48%.[11] SPD's dashboard also indicates violent crime in the three areas identified for CCTV expansion has declined by 21% since 2022, calling into question the necessity of expanding surveillance.[12]

Reliance on surveillance technologies, in particular CCTV, warrants careful evaluation. While CCTV collects and generates large volumes of data, this data cannot be equated with improvements in staffing capacity, community trust, or public safety.[13] SPD identifies staffing capacity shortages as the central operational issue for safety and police effectiveness. However, surveillance technologies will not resolve this issue. As recently as 2020, SPD acknowledged that "up to 45% of SPD patrol service hours do not require an officer" and that there are "multiple

[6] Michener 2013, Shamas and Arastu 2013, Friedman and Ponomarenko 2015, Harcourt 2015, Joh 2017, Brayne 2017, Soss and Weaver 2017, Eubanks 2018, Arnett 2020, Moy 2021.
[7] Michener and Ford 2023 (racism, surveillance, and racialized policing), Gaynor and Blessett 2021 and Girardi 2021 (policing and 2SLGBTQ+ communities), Morgan 2021 and Thompson 2021 (disabled communities and policing).
[8] Examples are numerous and include President Trump's deployment of National Guard troops to Los Angeles as well as his previous deployment of Department of Homeland Security agents to interrogate Portland #BlackLivesMatter protesters.
[9] On the CSWG's website, it appears that the last meeting occurred in April 2025. The Surveillance Ordinance tasks the CSWG with providing a privacy and civil liberties impact assessment for each SIR that reviews any impacts on civil rights and liberties as well as disparate consequences for communities of color and marginalized communities. The CSWG authored a thorough assessment for the initial 2024 SIR on the CCTV and RTCC technologies. See Seattle Municipal Code 14.18.080 and this article by René J. Peters Jr., who served on the CSWG. As for the recommendation to partner with scholars, some of the most respected researchers include Dr. Ruha Benjamin, Ph.D., Tracey L. Meares, J.D., Dr. Joe Soss, Ph.D., Dr. Vesla Weaver, Ph.D., Dr. Amy Lerman, Ph.D., Dr. Spencer Piston, Ph.D., Dr. Monica C. Bell, Ph.D./J.D.
[10] For CB 121052, SPD submitted the following supporting materials: 2025 SIR Executive Overview for CCTV and 2025 SIR for CCTV. For CB 121053, SPD submitted the following supporting materials: 2025 SIR Executive Overview for RTCC and 2025 SIR for RTCC.
[11] Crime data was analyzed for January – August 2025 and compared against the same timeframe in 2022, when violent crime hit a 30-year peak. Data was pulled from SPD's Crime Dashboard on September 2nd, 2025.
[12] The three proposed locations where CCTV cameras will be added are the Stadium District (K2), the area around Garfield High School (G2) and the Capitol Hill Nightlife District (E3). Data on violent crime was pulled from SPD's Crime Dashboard and analyzed using geographic boundaries of the corresponding Seattle Police Beats.
[13] Researchers consistently find that the efficacy of these surveillance technologies is inconclusive: Piza et al. 2019, Taylor 2010, Cameron et al. 2008, King et al. 2008, Farrington et al. 2007, Gill and Spriggs 2005.

areas of service that would be better responded to by parties other than a sworn officer."[14] Given this data, the most appropriate response to mitigating operational issues of staffing is to establish greater role clarity. Police should focus on duties aligned with their training while behavioral health specialists, social workers, and service providers should respond to issues related to health crises, displacement and homelessness, and poverty. Realigning responsibilities would directly strengthen SPD's operational capacity and effectiveness.

Scientific and peer-reviewed research further underscore the limits of CCTV and RTCCs. The peer-reviewed literature in law, social science, and behavioral science does not support claims that these surveillance technologies reduce "persistent felony crimes," "serious and violent crimes," and/or "gun violence and human trafficking.[15] The most persistent finding is that the evidence is, at best, inconclusive.[16] For example, criminologists evaluated 40 years of evidence and found that CCTV may reduce parking lot crime when this technology is supplemented by security guards, signage, and improvements in visibility by way of lighting.[17] Crucially, these scholars emphasize CCTV's measurable impact is limited to vehicle and property crimes, with modest overall effects and no significant reduction in violent crime.

Further, the scientific and peer-reviewed evidence on RTCCs remains limited. Researchers note that "little is known about their efficacy," and there are no nationally representative studies to date.[18] Of the limited peer-reviewed evaluations conducted, the findings suggest that effectiveness depends heavily on the presence of skilled analysts, efficient workflows, strong detective training, robust police-community trust and relationships, and strong forensic support staff.[19] In other words, RTCCs do not solve staffing capacity issues and may worsen these issues by adding new technical demands. Moreover, even when RTCCs function with this fleet of support, the benefits of the technology are retrospective: RTCCs may support investigations and case clearance, particularly for property crimes, but there is no established causal relationship between RTCCs and reduction in "persistent felony crimes," "serious and violent crimes," and/or "gun violence and human trafficking."[20] Given the above, SOCR concludes that investing in role alignment and community relationships are more effective pathways to safety than expanding surveillance technologies that are resource-intensive, misaligned with SPD's stated operational challenges, and not backed by evidence.

COSTS OF SURVEILLANCE: CIVIL LIBERTIES, RIGHTS, AND EQUITY

A substantial body of scientific and peer-reviewed research documents the far-reaching costs of surveillance, particularly for civil rights, civil liberties, and equity. These costs include legal estrangement, diminished civic

[14] The 2020 data is the most recent that we have been able to access, see SPD Budget Change Decision Points.
[15] The effectiveness of these technologies must be demonstrated with rigorous experimental research methods that rule out confounding variables. In criminology specifically, randomized controlled experiments are the gold standard for evaluating the causal effects of criminal legal system technologies, programs, and practices. However, as Piza et al. 2019 notes, "randomized controlled experiments are a rarity in the study of CCTV."
[16] Researchers consistently find that the efficacy of these surveillance technologies is inconclusive: Piza et al. 2019, Taylor 2010, Cameron et al. 2008, King et al. 2008, Farrington et al. 2007, Gill and Spriggs 2005.
[17] SPD's 2025 SIR for CCTV also cites this study but neglects to present its findings in the same qualified manner as the authors. For example, the authors state "of particular salience is the continued need for CCTV to be narrowly targeted on vehicle crimes and property crimes" and they specify that the "16% reduction in crime" is statistically significant but modest overall because this finding was driven by a "51% reduction in crime in the car park schemes with CCTV in other settings have small and non-significant effects on crime." It is noteworthy that this research article examines CCTV globally and this further suggests the tenuous link between the installation of surveillance technologies and the deterrence of crime. As the authors write in their analysis of the data, "CCTV was associated with significant reductions in vehicle crime and property crime in general, with no significant effects observed for violent crime."
[18] Arietti 2024.
[19] Przeszlowski et al. 2023, Hollywood et al. 2019, Braga and Dusseault 2016, Carter and Carter 2015, Brunson and Wade 2019.
[20] Arietti 2024 and Przeszlowski et al. 2023 observe that use of surveillance technologies "may not be the most beneficial way forward for incidents involving violence" particularly against women or populations that tend to experience disproportionate gendered violence (e.g., murder, rape, and human trafficking).

engagement, adverse health, barriers to employment and suppressed wage growth, obstacles to accessing vital social services, disruption of family and community connections, and the erosion of fundamental civil rights and liberties.[21] Beyond these harms, surveillance deployed by police communicates powerful societal messages, teaching "lessons on who is a citizen deserving of fairness and justice and who constitutes a group of dangerous *others* deserving of severe punishment, monitoring, and virtual branding."[22]

For communities who are overrepresented in police stops, arrests, and use-of-force incidents, living under conditions of surveillance technology intensifies the stigma and harms of criminalization.[23] Consider, for example, the proposed addition of CCTV around Garfield High School. These cameras may send a clear signal to young people in the area, particularly given SPD's documented racial disparities in use-of-force against Black youth, that they are suspects rather than community members.[24] SOCR is similarly concerned about the potential of surveillance technologies to discourage individuals who are low-income, unhoused, or disabled from seeking essential services. Moreover, the harms extend beyond individuals as entire neighborhoods will be marked as dangerous zones that need to be policed and surveilled closely.[25] It is worth considering the impact this will have on 2SLGBTQ+ communities in Capitol Hill, who are already contending with heightened exclusion locally and nationally.[26] The stigma produced by expanded surveillance technologies will compound economic disinvestment, reinforce segregation, and increase distrust between communities and local government.[27]

In addition to weighing racial and socioeconomic inequities, it is important to consider how these technologies will affect civil rights and liberties. CCTV and RTCC technologies are not neutral instruments, as they carry direct consequences for equal protection, privacy, and the freedoms of speech and association. When these surveillance systems are disproportionately deployed in neighborhoods where communities who are Black, Indigenous, People of Color, low-income, disabled, and 2SLGBTQ+ live, work, and gather, the result is a policy feedback loop that stigmatizes these communities as "concentrated crime" areas.[28] This outcome, in which racially and socioeconomically marginalized communities are subject to far greater surveillance than predominately White or affluent communities, raises serious civil rights and liberties concerns.

Specifically, the disparate monitoring and surveillance of some people but not others may constitute a violation of equal protection under the Fourteenth Amendment. CCTV and RTCC infrastructure also risk undermining privacy rights protected by the Fourth Amendment and/or Article 1, Section 7 of the Washington Constitution, as

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[21] Bell 2017 (legal estrangement), Michener 2013 (diminished civic engagement), Theall et al. 2022 and Sewell et al. 2016 (adverse health effects), Asad 2023 (barriers to employment and suppressed earnings), Madden et al. 2017 (obstacles to accessing vital social services), Roberts 2012 (disruption of family and community connections), Shamas and Arastu 2013 (erosion of fundamental civil rights and liberties). Additionally, legal scholars have identified four specific ways that surveillance technologies exacerbate inequity: it perpetuates and obscures inequities in policing, relocates disparities from other domains to law enforcement, amplifies the harms of inequitable policing, and undermines efforts to monitor and address these injustices. Friedman and Ponomarenko 2015, Harcourt 2015, Joh 2017, Eubanks 2018, Moy 2021.

[22] Soss and Weaver 2017.

[23] Lerman and Weaver 2014, Soss and Weaver 2017, Gaynor 2018 , Boddie 2022.

[24] The Science of Justice: Seattle Police Department is a 2021 report on SPD use of force that identified the greatest racial disparities among young people ages 15 – 21. Of 563 incidents involving SPD use of force between 2014 – 2019, an overwhelming 59% of young people were Black American.

[25] Spatial analysis data indicates that the current and proposed CCTV cameras cover areas where Black, Indigenous, People of Color, low-income, disabled, and 2SLGBTQ+ communities tend to live, work, and congregate. These areas are in census tracts made up of populations who are on average 49% people of color, 26% making an income below 200% of the poverty level, and 17% living with a disability. See Seattle's Race and Social Equity Index. Additionally, the current and proposed camera locations are concentrated on arterial streets where vulnerable populations are more likely to be present because they rent, use transit, or lack private public space for rest and recreation.

[26] Examples of this exclusion include a spate of executive orders targeting Trans people, book bans targeting LGBTQ representation, bias incidents against individuals and businesses/community spaces, prohibitions on gender-affirming care, and, most recently, a US Senator declaring that a CDC official should have been disqualified from government service because of his "lifestyle."

[27] Capers 2011, Justice and Meares 2014, Soss and Weaver 2017.

[28] See 2025 SIR Executive Overview for CCTV and 2025 SIR for CCTV.

these technologies systematically collect, store, and interconnect vast amounts of sensitive information about the everyday lives of people in Seattle.[29] Further, the knowledge that people's activities are continuously monitored and tracked by law enforcement will have a chilling effect on the exercise of First Amendment rights to speech and association. It is crucial to underscore these concerns amid the broader national context of alarming federal overreach. Currently, the federal official appointed by the Trump Administration as the District of Columbia's "emergency police commissioner" can access that city's RTCC infrastructure for "federal purposes."[30] Any proposal to rely on law or the judiciary to constrain federal authorities must also account for the Administration's extraordinary success rate at the United States Supreme Court.[31] Cumulatively, these risks require careful assessment, oversight, and safeguards before further deployment of surveillance technologies.

RECOMMENDATIONS

CB 121052 and CB 121053 would significantly expand surveillance technologies that remain in pilot stages and pose serious civil rights, civil liberties, and equity implications. SOCR offers the following community-centered recommendations for promoting safety, transparency, racial and socioeconomic equity, and the protection of civil rights and liberties:

- Prioritize community-based alternatives and social service provision.
    - Evidence shows that investments in community organizations and relationships can reduce crime more effectively than unproven surveillance technologies.[32]
    - Cities like Nashville, Austin, and Denver have chosen to move away from similar surveillance technologies due to the risk of federal co-opting of data and the undercutting of essential civil rights and liberties.[33]
    - Invest in recruiting and retaining service providers, behavioral health specialists, and social workers to reduce reliance on police for non-criminal and crisis-related issues.[34] This will not only mitigate the root causes of harm but also support police operational capacity by allowing officers to focus on issues that align with their skills and training.[35]

- Institute pilots with conceptual clarity and precise provisions tied to measurable outcomes.
    - Pilots must be grounded in consistent and precise terminology to allow for fair evaluation. Currently, the terms in CB 121052 and CB 121053, the 2025 Executive Overviews, and the 2025 SIRs are used ambiguously and interchangeably. They range from "persistent felony crimes" to "serious and violent crimes" to "other persistent crimes" to "gun violence and human trafficking." Without conceptual clarity, evaluation becomes arbitrary, and accountability is impossible.

[29] United States Constitution and Article I, Section 7 of the Washington State Constitution.
[30] Davidson 2025.
[31] Sheth and Whisnant 2025.
[32] Ramey and Shrider 2014's research analyzing the City of Seattle's Neighborhood Matching Fund identified significant reductions in violent crime as a result of the program. Other research has shown that the presence of libraries and the increase in library operating hours reduces crime rates (including homicides and aggravated assaults). Neto et al. 2021.
[33] Nashville voted against implementing a similar Real-Time Crime Center in 2024, citing concerns about privacy and potential federal misuse of footage. In May and June 2025, Austin and Denver paused their automated license plate reader contracts amid immigration-related privacy concerns. Other jurisdictions, including Oakland, CA, and Somerville, MA, have also passed similar ordinances.
[34] Crisis Assistance Helping Out on the Street (CAHOOTS), an alternative response program in Eugene, OR, that ran from 1989 to 2025, spurred similar pilot programs in other cities. Bell 2021. Similarly, in 2020, the City of Albuquerque created the Albuquerque Community Safety department which includes "trained professionals such as social workers, housing and homelessness specialists, violence prevention and diversion program experts."
[35] Continued investment in and more autonomy for Seattle's Community Assisted Response and Engagement (CARE) department will further support the ability "to safely assist community members in need and free up scarce police resources for higher priority calls."

  - Continuation and/or expansion of any pilot should depend on data and evaluation.
  - A concrete timeline and exit strategy must be in place to ensure technologies are discontinued if they fail to achieve defined goals.

- Limit CCTV use and data retention to protect civil rights and liberties.
  - Footage should be restricted to investigating serious violent offenses as defined in the RCW.
  - Data retention should be capped at 7-14 days to protect the people of Seattle, especially those who are exceptionally vulnerable such as individuals seeking gender-affirming care, reproductive care, housing services and resources, or immigration support.[36]
  - Use of data should be transparently reported not only to the Office of Inspector General (OIG) and Office of Police Accountability (OPA) but also to SOCR, the CSWG, and the public.

- Ensure robust community engagement before, during, and after any surveillance adoption.
  - The technologies under consideration are complex, interconnected, and linked to other surveillance methods such as Automated License Plate Readers (ALPRs). The current City of Seattle publicly accessible materials on these technologies do not adequately explain the risks, costs, or potential scope.
  - The people of Seattle deserve clarity on what information can be recorded, how it may be aggregated, and the full range of possible uses. They also deserve clarity on how the City plans to protect data from federal overreach. This could include destruction of data when federal overreach appears likely.
  - Reports on data usage and access should be publicly accessible, written in plain language, and provided and updated monthly.[37]
  - While limited engagement occurred around gun violence prevention near the Garfield High School area, broader and more inclusive consultation is needed. This is especially true with residents, service providers, and others who frequent the areas affected.
  - Feedback should be gathered widely and assessed if additional surveillance changes the willingness of people to exercise their rights, access public places, and seek services and resources.

- Establish mandatory oversight and independent evaluation.
  - Any material updates should undergo the full Surveillance Impact Report Review process, including meaningful public awareness and engagement, application of the Racial Equity Toolkit, and review by the CSWG. Strengthening the CSWG and oversight generally by identifying best practices in other cities should also be explored.[38]
  - Pilot evaluations should be conducted by SOCR in collaboration with research scholars who have demonstrated expertise in technology, civil rights and liberties, and racial and socioeconomic equity.

[36] The CSWG recommended limiting data retention of CCTV recordings to 14 days in their Privacy and Civil Liberties Assessment on CCTV and RTCC. Given increased federal data seizures, SPD should consider limiting data retention even further.
[37] See the City of Seattle's Executive Order, "Making Information Inclusive in Writing and Design." Examples of data that should be made available include: a map of where cameras are located; how many active cameras, both public and privately owned, are registered, integrated, or connected to the RTCC; make and model information of all cameras; how many individuals have access to data; information on RTCC searches not connected to an investigation; and external requests for footage access.
[38] The Oakland Privacy Advisory Commission might provide a valuable example.

Seattle
Community
Police Commission

September 4, 2025

VIA EMAIL

Dear Councilmembers,

We are writing to ask the City Council to vote against any expansion of surveillance pursuant to the CCTV and RTCC programs (Surveillance Pilot).[1] Expansion of these programs is currently scheduled for vote at City Council on September 9, 2025. We are strongly opposed to the expansion of surveillance technology while critical issues regarding privacy and civil rights remain unaddressed.

Community members are overwhelmingly against expansion. An immediate and consistent concern raised by community– and acknowledged, though not addressed, by the City Council – is the growing risk of actors outside the City misusing surveillance information against the Seattle community. By expanding, the City is breaching its commitment to scrutinize the surveillance: whether it works and its impact on civil rights during a two-year pilot before continuation or expansion.[2] Now, in the middle of the Surveillance Pilot, we lack that information necessary to weigh the risks.

Alternatively, if Council is opposed to rejecting expansion at this time, we recommend engaging more community perspective and convening an Executive Session to discuss the consequences and legal implications related to data sharing with federal agencies hostile to Washington laws that ensure gender affirming care, abortion, and immigration protections.

A. Premature Surveillance Expansion Increases Mistrust of the City and SPD

We lack the data and evidence necessary to evaluate the risks of infringement on civil rights and privacy and if the Surveillance Pilot is achieving its intended goals. Concerns raised by the CPC, OIG, and the Community Surveillance Working Group have not been addressed, and only one year into the Pilot, the two-year evaluation has not yet occurred. This information is necessary to address community concerns before expansion.

1. The City Has Not Fulfilled Its Promises to Listen to And Protect Community, Which Overwhelmingly Opposes Surveillance

Community members and community organizations remain opposed to the Surveillance Pilot. In August 2024, when the Pilot was proposed, dozens of residents spoke out in opposition, and numerous Civil Rights organizations—including the ACLU of Washington, OneAmerica, 350

Seattle, Chief Seattle Club, El Centro de la Raza, Gender Justice League, Massage Parlor Outreach Project, Planned Parenthood Alliance Advocates, and WA People's Privacy—urged Council to reject it.[3]

The City's own Community Surveillance Working Group, who conducted a Privacy and Civil Liberties Impact Assessment for CCTV and RTCC, reviewed the Surveillance Impact Report (SIR) and letters from community organizations and public comments to conclude:

> "After reviewing the information, a majority of the working group ***is unsupportive of any pilot deployment of these two technologies*** as described in the SIRs. ***The amount and urgency of the concerns and outstanding questions both warrant pause on pilot deployment***…. This sentiment reflects the ***high degree of apprehension expressed by a vast majority of the public's comments[,] regarding the potential misuse*** of these technologies. These comments were overwhelmingly negative and voiced a ***serious concern and lack of trust*** within the community as a whole[.] [T]he working group believes that going forward with these acquisitions ***may serve to further erode*** with a significant portion ***the public's trust in SPD and negatively affect community relations***."[4]

At the August 12, 2025, Public Safety meeting, every community member offering public comment opposed expansion of the Surveillance Pilot. One speaker summarized the impact on our most vulnerable communities: "If we move all this data to a third-party cloud, we risk handing it over to ICE and anti-abortion states making it easier to target immigrants, women, trans people, and activists." Another explained how surveillance data is already being misused: "the President is liable to take over municipal police departments, this legislation would allow the police and whoever controls them more ability to target whoever they want...ICE is already using surveillance data like this....SPD itself has a history of biased enforcement....Council should reject all legislation that expands surveillance."

Community members also have significant concerns about the location of two of the three expansion areas to the Central District (Seattle's historically Black neighborhood, and Capitol Hill (Seattle's 2SLGBTQIA+ neighborhood, home to Cal Andersen park, home to several protests resulting in audit reviews of SPD response to protests during BLM protests and most recently, SPD's response to 2SLGBTQIA+ community protesters on May 24, 2025). Public comment from a member of Central District raised concerns about "erosion of our civil rights" and the "disparate impact on minority youth." A queer Capitol Hill resident "who's everyday life will be documented by these cameras" summarized the consequences: "good governance depends on policy data.... Expanding the program without waiting for information is a huge gamble of precious City resources.... When councilmembers wipe away the testimony of hundreds of people who've expressed their opposition...it frays the fabric of our civil society and democracy itself." These neighborhoods are home to communities that continue to be subjects of

significant police action and over policing, expanding surveillance compounds disproportionate impact.

2. Surveillance Expansion Has a Disproportionate Impact on the Civil Rights of Communities of Color

Surveillance technologies have a disparate impact on communities of color. In 2024, Seattle's Community Surveillance Working Group warned that the Surveillance Pilot could disproportionately harm communities of color, both through built-in bias in the technology itself and through increasing exposure to law enforcement and the criminal legal system.[5] We have already seen that biased impact in Seattle. Most recently, in Wallingford, where CCTV footage was used to wrongly identify and arrest an Asian man for arson and murder. He was interrogated for hours and jailed for a month; despite having a different name and offering his own in-house technology to prove he was home at the time of the crime.[6] Additionally, during the 2020 Black Lives Matter protests, the FBI and SPD surveilled protesters observing First Amendment rights without public knowledge or oversight, at the expense of residents' privacy and civil liberties.[7]

3. Oversight Recommendations Have Not Been Addressed

When the pilot was first proposed, the CPC recognized support for a "time-limited and location-limited pilot" so long as it included "continued community engagement and feedback from the community[,]" "determinations of metrics measurements before implementing any new use of these technologies[,]" and a two year period of time that would include an additional Surveillance Impact Report process to be repeated "before the program is made permanent **or expanded**." The CPC made clear the importance of community engagement and feedback and of the significance of data and oversight that was to be provided by the Office of the Inspector General.[8]

There remain unaddressed and outstanding recommendations regarding surveillance by the CPC, OIG, and the Community Surveillance Working Group intended to address the implications this surveillance has on our constitutional rights and civil liberties.[9] Some of these recommendations have been outstanding since 2019 (regarding the collection and recording First Amendment protests during BLM).[10] OIG's latest surveillance report addresses the need for protection of this data regarding third parties and notes that digital recordings marked for Evidence.com are stored indefinitely.

4. Risk of Misuse of Surveillance Data by the Federal Administration and Outside Actors

We are at an unprecedented time when the Trump Administration is undermining the sovereignty of state and local jurisdictions and targeting sanctuary cities, including Seattle. The Administration has intent to assert control of local law enforcement and local agencies in

sanctuary cities. They first issued executive orders in April, [11] then in June, they deployed the National Guard in L.A.[12] Just this month they announced a takeover of law enforcement in Washington, D.C., through deployment of the National Guard, declaring an emergency to address "out-of-control" violent crime, and deploying federal law enforcement and immigration agents through the City. [13] They have made clear their intentions to do so in other cities, most recently Chicago.[14] They recently sent a letter to Washington State and the City of Seattle demanding an end to "sanctuary jurisdiction" policies that limit police cooperation with ICE.[15] Now is not the time to expand surveillance that could be used by the Administration against our community members.

Equally concerning, yet less understood, are interoperable databases and third-party agreements, which often have the unintended consequence of violating civil rights.[16] Several sources have confirmed that ICE is using ALPR[17] and facial recognition data to track immigrants with local law enforcement agencies, some in sanctuary cities, often obtained informally and in violation of state and privacy laws.[18] Local surveillance information is also vulnerable to misuse through Fusion Centers, [19] and other interoperable databases, where the Administration has access to ALPR and facial recognition, allowing ICE to sidestep sanctuary city laws.[20] The Washington State Fusion Center "facilitate[s] information sharing" between local law enforcement and homeland security partners.[21] It serves as a "virtual network" where state, local, federal, and even private stakeholders share surveillance and law enforcement data. DHS officials work directly alongside SPD, WSP, and King County officers within Washington's Fusion Center. [22] Expanding surveillance in Seattle would only broaden the data available to ICE through this system.

We understand that SPD's immigration policy states: *"Employees will not initiate, maintain, or participate in any police action based on an individual's immigration status."* We trust SPD officers to comply with all applicable laws, but working side by side with federal agents at the Washington Fusion Center puts SPD officers in a difficult position. SPD officers might feel compelled to provide surveillance data, if requested, for any broadly defined "criminal" investigation by the current Administration. And failure to do so could result in increased scrutiny by the Administration.

5. **The Consent Decree Has Terminated, Community Trust and Oversight is Paramount**

We are urging City Council to reject expansion of the Surveillance Pilot at this time. Alternatively, if Council is opposed to rejecting expansion, we strongly recommend engaging community perspectives and convening an Executive Session to examine the potential consequences and legal implications of data collection and sharing under a hostile federal Administration.

The expansion of surveillance that lacks data establishing its efficacy, in the face of community opposition, and when doing so exposes the Seattle community to federal overreach and further misuse of private information will only sow further mistrust of City government and SPD. The City just emerged from federal oversight of SPD, this is the time to listen to and prioritize community voice in public safety and policing – voices asking for investments in housing, behavioral health, and community-based safety programs, not through expansion of untested surveillance prone to misuse and subject to harming communities most impacted by policing.

Sincerely,

Police Practices Workgroup
Community Police Commission

Cc:
All City Councilmembers
Mayor Bruce Harrell
Deputy Mayor Tim Burgess

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[1] This letter issues from the PPWG, a working group of the CPC. The CPC's regularly scheduled September meeting will not take place due to the scheduling conflict with the September 3, 2025, hearing on the Consent Decree at the Western District of Washington.
[2] 2024 CCTV Surveillance Impact Report, SPD: 2024 CCTV SIR FINAL.pdf; 2024 RTCC Surveillance Impact Report, SPD: 2024 RTCC SIR FINAL.pdf
[3] Harrell's Expanded Surveillance Program Clears Hurdle in Seattle Council » The Urbanist
[4] Surveillance Impact Report Privacy and Civil Liberties Impact Assessment, The Community Surveillance Working Group: https://www.seattle.gov/documents/Departments/SAWG/SAWG%20Documents%202024/CSWG%20Privacy%20and%20Civil%20Liberties%20Assessment_%20CCTV%20%26%20RTCC.docx.pdf
[5] Surveillance Impact Report Privacy and Civil Liberties Impact Assessment, The Community Surveillance Working Group: https://www.seattle.gov/documents/Departments/SAWG/SAWG%20Documents%202024/CSWG%20Privacy%20and%20Civil%20Liberties%20Assessment_%20CCTV%20%26%20RTCC.docx.pdf
[6] KUOW - Seattle man says dropped murder, arson charges against him were result of 'racist misidentification'
[7] FBI and SPD infiltrated Seattle 2020 protests, used informants and surveillance | May 28–June 3, 2025 | Real Change
[8] CPC Official Statement on SPD's Technology Assisted Crime Prevention Pilot Program, dated March 21, 2024. https://www.seattle.gov/documents/Departments/CommunityPoliceCommission/Press%20Releases/2024/CPC%20Statement%2003.21.24%20SPD%20technology.pdf
[9] Office of the Inspector General's Consolidated Risk Surveillance Usage Review 2024, dated June 6, 2025 https://www.seattle.gov/documents/Departments/OIG/Audits/OIG_Surveillance_Consolidated2024.pdf
[10] Follow-up Audit of SPD Compliance with Chapter 14.12 of Seattle Municipal Code, Collection of Information for Law Enforcement Purposes: https://www.seattle.gov/documents/Departments/OIG/Audits/2023_Chapter_14.12_Audit.pdf
[11] https://www.whitehouse.gov/presidential-actions/2025/04/protecting-american-communities-from-criminal-aliens/ https://www.federalregister.gov/documents/2025/05/02/2025-07790/strengthening-and-unleashing-americas-law-enforcement-to-pursue-criminals-and-protect-innocent
[12] Trump deploys California National Guard to LA to quell protests despite the governor's objections | The Seattle Times
[13] Trump's order to deploy troops in DC is his latest use of the National Guard in cities | The Seattle Times

[14] https://www.cnn.com/2025/08/26/politics/trump-national-guard-us-cities
[15] KUOW - As DOJ threatens WA over sanctuary laws, state officials double down on protections
[16] License Plate Readers Proliferate in Washington, Bringing Concerns over ICE Overreach, The Urbanist https://www.theurbanist.org/2025/06/19/license-plate-readers-proliferate-in-washington-ice-overreach/ (Reporting that that data collected by Flock Safety ALPRs, relied upon by the King County Housing Authority (KCHA), was recently shared with ICE and DHS. Authorities in Texas conducted a nationwide search of more than 83,000 ALPR cameras for a woman accessing abortion; the internal audit showed KCHA's data was searched).
[17] Who's Watching Washington: Dangers of Automated License Plate Readers to Immigrant and Reproductive Rights in Washington State, https://jsis.washington.edu/humanrights/2022/12/07/whos-watching-washington/
[18] Immigration Police Can Already Sidestep US Sanctuary City Laws Using Data-Sharing Fusion Centers | WIRED https://www.wired.com/story/ice-sanctuary-cities-fusion-centers/ ; See also, ICE Outlines How Investigators Rely on Third-Party Facial Recognition services https://www.nextgov.com/emerging-tech/2020/06/ice-outlines-how-investigators-rely-third-party-facial-recognition-services/165846/#:~:text=Law%20enforcement%20agencies%20at%20every,methods%2C%E2%80%9D%20the%20document%20states.
[19] See November 19, 2024 Report by STOP Surveillance Technology Oversight Project https://static1.squarespace.com/static/5c1bfc7eee175995a4ceb638/t/673b7bdc7bfa22584f88e956/1731951581156/2024.11.19_STOP+Report_Deportation+Data+Centers_final.pdf
https://www.stopspying.org/deportation-data-centers
[20] See November 19, 2024 Report by STOP Surveillance Technology Oversight Project, above: for example, ICE agents in Philadelphia's Fusion Center used the City's automated license plate reader system to track undocumented drivers—despite sanctuary city laws prohibiting such actions. ICE's 2020 facial recognition manual also encouraged reliance on Fusion Center data (though DHS has since deleted the public link: https://www.dhs.gov/sites/default/files/publications/privacy-pia-ice-frs-054-may2020.pdf).
[21] https://www.wsfc.wa.gov/About
[22] https://publicintelligence.net/wp-content/uploads/2010/06/WSFC1.png