Seattle
Information Technology

2021

Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report

Seattle Information Technology

Purpose

The purpose of the Equity Impact Assessment is to provide analysis about whether the Surveillance Ordinance is meeting its goals and to provide recommendations about changes, adjustments, or new approaches to meet its stated objectives. The Ordinance language definition for this required report is as follows:

> *Every year, beginning by no later than September 15, 2019, and continuing by no later than September 15 each year thereafter, the Chief Technology Officer shall produce and submit to the City Council a Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report ("equity impact assessment"), to be filed with the City Clerk with an electronic copy to the Council, the Chair of the committee responsible for technology matters, the co-chairs of the Working Group, the City Auditor, the Inspector General for Public Safety, and the Director of Central Staff, and posted to the City's website.*
>
> *The equity impact assessment shall address, at a minimum, the following:*
>
> 1. *Whether this Chapter 14.18 is effectively meeting the goals of the Race and Social Justice Initiative, including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies;*
> 2. *What adjustments to laws and policies should be made to remedy any disproportionate impacts so as to achieve a more equitable outcome in the future; and*
> 3. *Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval submitted pursuant to Section 14.18.030.*
>
> *B. The CTO shall consult with the co-chairs of the Working Group in the writing of the equity impact assessment, and shall include all Working Group feedback and recommendations in the equity impact assessment; if the CTO disagrees with a recommendation, the CTO shall provide an explanation of the disagreement in the report.*

Report Organization

This report provides sections devoted to:

- **Ordinance Background**
- **Report Summary**
- **RSJI Goals and Community Impact**
- **Recommended Policy and Legal Adjustments**
- **Future Review Considerations**

Background

The Surveillance Ordinance

The Seattle City Council passed SMC 14.18, known as the "Surveillance Ordinance", to provide greater transparency to City Council and the public when the City acquires technology that meets the City's definition of surveillance. The Surveillance Ordinance, which took effect in September 2017, outlines requirements that include surveillance technology review and approval by City Council before acquisition for new technologies; Council review and approval via ordinance for existing technologies; and reporting about surveillance technology use and community impact. The Surveillance Ordinance is meant to protect the information of vulnerable populations who may not understand how information they give to the City could be used. The American Civil Liberties Union and the Seattle Privacy Coalition have been active partners in this effort.

SIR Completion Status

To date, the following SIRs have been completed and approved by City Council:

Department	Technology	Approved
SDOT	CCTV	9/23/2019
	LPR	
SFD	Computer Aided Dispatch (CAD)	3/22/2021
SCL	Binoculars	
	Check Meter Device	
	SensorLink AmpFork	
SPD	Computer Aided Dispatch (CAD)	4/19/2021
	Automated License Plate Reader (ALPR)	
	Parking Enforcement (Including ALPR)	
	CopLogic	
	911 Logging Recorder	
	FLIR	5/24/2021
	Video Recording Systems	
	Situational Awareness Cameras	

The following SIRs are in process of being completed or submitted to Council. The date column represented the projected Council review date.

	Callyo	*December 2021*
	I2 iBase	
	Maltego	
	Audio Recording Systems	
SFD	Emergency Scene Cameras	*September 2021*
	Hazmat Camera	

SDOT	Acyclica	
SPD	Camera systems	*December 2021*
	Tracking devices	
	Remotely Operated Vehicles (ROVs)	
	GeoTime	
	Hostage Negotiation Throw Phone	
	Computer, cellphone and mobile device extraction tools	
	Crash Data Retrieval	

Report Summary

Significant progress has been made in the review and approval of retroactive surveillance technologies. This process has highlighted the importance of privacy and civil liberties considerations in the acquisition of technologies across the City and has allowed residents the opportunity to learn and provide feedback and oversight into the use of potentially invasive technologies in their community.

Though the COVID-19 pandemic significantly hampered efforts to engage the community, the City was able to utilize online comments and meeting technology to gather opinion and insight from the public. Continued effort will be placed on connecting with the City's most vulnerable populations and historically marginalized communities. The Community Surveillance Working Group has completed all requested reviews and duties, but at this time does not have a full complement of members in the group due to attrition. Both Council and Mayor's Office have been advised on the need to add additional members, but recruitment has been difficult. Continued evaluation and recruitment will be necessary to ensure the group is meeting the ordinance objective to provide expertise on civil liberties and representing community-based organizations.

Regarding disproportionate impact on communities, to date the City has received documented concerns related to two surveillance technologies, and one official investigation into unsanctioned use of a technology not on the Surveillance Master List but subject to State of Washington legal oversight, which are detailed later in this document. Most of the surveillance technologies in use or approved are not used in ways that result in disproportionate impacts across the City. Seattle IT and Executive departments will continue, as prescribed by the Ordinance, to engage in outreach efforts and document any disproportionate use or disparate impact in the use of surveillance technologies.

RSJI Goals and Community Impact

> *Whether this Chapter 14.18 is effectively meeting the goals of the Race and Social Justice Initiative, including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies*

SIR RSJI review

We included a modified RSJI review methodology for the SIR to ask and document equity concerns for the technologies under review. The purpose of this section of the SIR is:

1. To provide a framework for the mindful completion of the Surveillance Impact Reports 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.
2. To highlight and mitigate any impacts on racial equity from the adoption and the use of the technology.
3. To highlight and mitigate any disparate impacts on individuals or vulnerable communities.
4. To fulfill the public engagement requirements of the Surveillance Impact Report

Per requirement provisions provided with Council approval for several technologies, department staff will be working on metrics for consistent reporting for future CTO Equity Reports.

Public Comment Analysis

We have not received significant direct feedback from the community or through the Community Surveillance Working Group outlining concerns about specific technologies. The comments submitted during the public engagement periods, however, are useful in understanding general sentiment about potential disproportionate impact of surveillance and concerns about its use.

Public Engagement

Public engagement conducted for the completed SIRs included public meetings, summary videos and documents for each technology, focus group discussions, and an invitation to provide online comments during the public comment periods for each technology review. These materials were posted publicly and are available online.

Before the 2020 Governor-mandated pandemic moratorium on activities unrelated to COVID relief and response, public engagement events were conducted across the City to introduce the public to the technologies, invite questions, and discuss issues about the technologies under review. The events have subsequently been conducted as online meetings. Significant effort was made to include diverse groups by sending invitations to over 60 community groups and civil liberties advocating organizations, and by providing translations of event notices and technology summaries.

Themes

While comments have been made concerning the potential disproportionate use or disparate community impact, few comments were made directly alleging specific instances of disparate use, (primarily concerns relating to SPD technologies, with specific instances covered below). Public comment is not analyzed as a whole by Ordinance requirements; however, each SIR contains an analysis of all comments provided during the comment period associated with all of the technologies under review. All comments received are included in the SIRs that are published online.

Group	Total Comments
Group 1	66
Group 2	31
Group 3	38
Group 4a	13

The main themes for comments provided continue to express general concern about the concept of government unnecessarily or over-surveilling in a way that could impact individual rights and civil liberties; uneasiness regarding how data and information is shared with other government agencies or City departments; appropriate application of department and city policy enforcement to ensure proper data use and management, including appropriate cybersecurity measures; and the potential for data collected for one purpose being used for other purposes related to public safety and law enforcement. There were also comments requesting additional cameras to enforce bike lane regulations and to

provide neighborhood and park safety. For more information on the breakdown of themes in comments, please see Appendix C.

Other Concerns

Concerns about civil liberties and invasions of privacy were brought to the forefront in the summer of 2020 during the period of frequent protests, marches, and other activist activities in Seattle. Specific issues were brought up about the use of two surveillance technologies on the Master List, specifically, the SDOT Closed Circuit Television (CCTV) system, and SPD's access to data collected by King County Helicopters' Forward Looking InfraRed (FLIR) cameras. In addition, a concern unrelated to a Master List technology was raised about SPD's possible use of facial recognition technology, something that SPD has repeatedly attested to not using. Details about these are as follows:

- In October 2020, a concern flagged on SDOT's Twitter account that CCTV cameras had been used to monitor protest activities, was raised by a civil liberties organization. This was brought to the Community Surveillance Working Group, and the issue was subsequently forwarded to the Seattle Department of Transportation and the City Auditor for review. The Auditor's report concluded that "SDOT is in general compliance with the technology's use pursuant to its Surveillance Impact Report (SIR) and Consolidated Surveillance Impact Report (CSIR)."
- The use of FLIR imaging was reported by one media outlet in April 2021, referencing use by other public safety technologies and agencies operating in the area, including the Washington State Patrol. WSP was assisting SPD with monitoring illegal activity during the 2020 protests and other unrelated investigations. Further IT review of the reported use (no formal complaint was filed) of the FLIR technology found no improper use by SPD.
- Also in April 2021, in response to an inquiry from the ACLU, the Office of Inspector General (OIG) and Office of Police Accountability (OPA) investigated and issued a report that found an SPD officer had on their own initiative acquired Clearview AI, a facial recognition technology, for use in investigation work. After OPA review, the officer was reprimanded, lost a day of pay, and was reminded of training and policy about not using facial recognition tools. This resulted in City Council identifying facial recognition technologies as a surveillance technology, subject to oversight of 14.18.

Recommended Policy and Legal Adjustments

> *What adjustments to laws and policies should be made to remedy any disproportionate impacts so as to achieve a more equitable outcome in the future*

Concerns and comments are primarily focused on the use of surveillance technologies by law enforcement and the potential for civil liberties abuse without appropriate policies or oversight. An additional frequently addressed concern by a very small number of individuals that is not explicitly covered by the ordinance addresses cybersecurity and overall security of some of the systems or data collected.

While the City's Surveillance Ordinance provides a high level of oversight on the use of surveillance technologies, we are highlighting two key challenges and recommendations for remediation to achieve a

more equitable outcome in the future. These were identified in the 2020 Equity Report and have become more pressing within the context of events in 2020:

1. *The process of engaging in community review currently does not adequately promote or result in broad engagement by the public as intended by the Ordinance.*

   The Ordinance requirements for public engagement are prescriptive. The City uses those requirements as a baseline to conduct public engagement, in addition to other City standards and best practices as advised by community outreach teams. The City continues to look for opportunities to expand this reach by collaborating with the SWG and finding new ways to support online public engagement opportunities to ensure we are reaching as many communities as possible, but these efforts have not been effective.

   Review of public comments about individual technologies and the process as a whole show that primary engagement is not amongst communities potentially disproportionately affected by use of surveillance technologies. In contrast to the Ordinance intent, the primary group identified in engaging in this process is white and in a subset of specific neighborhoods not identified as communities of concern for over-use of surveillance. A very small number of members of the public are involved in the review process. These few individuals are primarily interested in technology related issues, with most of their comments and concerns focused on the technical backend of systems or security, rather than the larger policy discussion relating to civil liberties or disproportionate community impact resulting from a technology's use. Despite efforts to make the public engagement material more accessible to a general audience, additional efforts will be required to bring this to a wider audience to gain a larger perspective on the technologies' use.

2. *Police defunding plans, general concerns, and issues about exempted technologies have superseded the original conversation about the use of surveillance technology*.

   In the analysis of public comment, we have found more frequent concerns about exempted technologies (such as body-worn and red-light cameras), technology outside of the City's jurisdiction, or other concerns not specific to the technologies under review. Recent conversations around the future of policing and reform efforts have further reinforced that a broader dialogue may be necessary to resolve issues around public trust and oversight of SPD activities, with the Surveillance Ordinance as just one aspect of this conversation.

Council Considerations for Future Reviews

Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval submitted pursuant to Section 14.18.030

Working Group Evaluation

Seattle IT staff distributed a survey in May 2021 about the SWG's composition and effectiveness to the seven current members of the SWG, as well as to 11 Executive and Legislative staff who have been closely involved with SWG and surveillance issues. While there was a low response rate that makes it

impossible to speak about a majority response, there is apparent agreement that a full complement of participating members to reach quorum at each meeting and who have a clear idea of their roles and responsibilities would make the group most effective. At this time, the group has only five of the seven members required by the Ordinance.

The follow excerpt from Council Central Staff's Memo summarizes the evaluation process and findings in more detail:

> The survey asked participants to rate SWG's performance relative to 23 statements and to provide written responses to five questions. Seattle IT received seven responses by the requested deadline (set for three weeks after distribution of the survey). While survey responses remained anonymous, the surveys responses identify as SWG members or City staff for purposes of analysis. Seattle IT received three responses from SWG members, a 43 percent response rate, and four responses from City staff, a 36 percent response rate.
>
> Given the small number of individual responses to the survey and the limited number of responses represented by "majority positions," findings from the survey cannot be considered a broad consensus of opinion among either SWG members or City staff. However, some survey responses do identify some shared areas of concern among those who responded to the survey. The strongest areas of agreement between SWG and City staff ratings showed positive ratings of meeting logistics and staffing and a "needs improvement" rating pertaining to maintaining a full complement of appointments to the SWG. Written responses from both SWG and City staff shared concerns about a lack of participation by members. Other areas identified by a majority of SWG members (i.e., at least two of three) as needing improvement include SWG's ability to fulfill its roles and responsibilities, receipt of agendas in advance, and all members contributing to findings. Ratings from a majority of City staff (i.e., two or three of four, depending upon "unable to evaluate" responses) identified areas needing improvement as SWG's understanding of its roles and responsibilities, its decision-making process, its impact assessments, and agenda materials and discussions.
>
> SWG has addressed several of these concerns in newly adopted bylaws, including expectations of members' attendance and participation, roles for the chair and co-chair, and formal decision-making processes, with established quorum requirements. The bylaws also suggest that the SWG may develop tools such as templates or checklists to encourage a standardized approach to its impact assessments. In addition, the new bylaws require the SWG to review its membership annually to ensure it reflects the equity-focused representation outlined in Ordinance 126679. It may be useful to distribute this survey again in 12-18 months, to evaluate how the bylaws have affected SWG's performance and composition.

The CTO does agree that the creation of bylaws for the group, accomplished earlier this year, should make the body more functional and identify specific areas for scoping their work. Addressing current and future vacancies to ensure the group is at full membership with appropriate representation will also be critical in ensuring the workload is evenly distributed among members.

Policy Collaboration

As identified in 2020, the final stage of analysis and discussion between stakeholders about the condensed SIR and the operational policies highlighted therein, occurs late in the process, before final SIR draft submission to Council. A review and identification of policy principles in advance of this final review would be more impactful method of informing and establishing acceptable policies about the use of the technologies under review. Moving this conversation to the beginning of the process in a discussion about acceptable use and civil liberties protecting data management policies and principles would be an effective approach to achieving Ordinance objectives.

Additionally, this protracted process has delayed acquisition of new technologies that meet the definition of surveillance. A consideration for future work would be to prioritize review of new technologies over retroactive reviews.

Departments that depend on new technologies and innovations to continue delivering high quality services are beginning to find their strategic planning and roadmaps influenced by the additional processing and review this process has created. Though some of these technologies warrant additional review, some departments such as SDOT spend an inordinate amount of time answering questions about technologies that may not raise as many civil liberties and community concerns as a law enforcement technology. As a result of this ordinance SDOT and other departments have shifted their priorities to focus on less invasive technologies, that may come at an added staffing or resource cost for their programs.

Appendix A: Working Group Bylaws

City of Seattle

Community Surveillance Working Group

Bylaws as of 6/28/2021

Article I – Establishment

The Surveillance Advisory Working Group ("Working Group") is established and authorized by Seattle Municipal Code (SMC) 14.18.080 to organize, elect co-chairs, and adopt such rules and administrative procedures consistent with the City Charter and said Municipal Code as are necessary to perform its functions and responsibilities.

Article II – Definitions

A. For the purpose of these Bylaws, the term "consensus" is defined as overwhelming agreement that goes as far as possible toward meeting the interests of all stakeholders.
B. For the purpose of these Bylaws, the terms "Surveillance Impact Report" and "SIR" refer to the reports City departments are required to include in their requests for surveillance technology acquisition or in-use approval as outlined in City of Seattle Surveillance Ordinance 125679.
C. For the purpose of these Bylaws, the term "community engagement session" is defined as any scheduled or announced event where members of the public are invited to provide input on surveillance technologies up for in-use approval or acquisition.
D. For the purpose of these Bylaws, the term "quorum" is defined as a majority of current members.

Article III. Purpose

A. The purpose of the Working Group is to advise the City Council and Executive on matters of surveillance technology from a community perspective by providing an assessment and recommendations regarding the potential impact of surveillance technologies on civil rights and liberties.
B. The Working Group shall provide a privacy and civil liberties impact assessment for each Surveillance Impact Report ("SIR") for any departmental request for surveillance technology acquisition or in-use approval.
C. The Working Group's recommendations shall be informed by its review and consideration of the following:

1. The potential disparate impact on communities of color and other marginalized communities.
2. The concerns and opinions of community members received via public comments, community engagement sessions, and regularly scheduled meetings.

D. The Working Group shall provide recommendations to the City of Seattle's Chief Technology Officer (CTO) for inclusion in the CTO's annual equity impact assessment in accordance with subsection 14.18.050.B of the SMC.

E. The Working Group shall be re-evaluated 18 months after establishment in accordance with the City ordinance.
   1. The Working Group shall review its membership annually to ensure accurately reflects the goals of equity-focused representation as outlined in City Ordinance 126679. If the Working Group is found to be out of compliance with the representation goals, it shall provide a request in writing to the Council and the Mayor requesting the appropriate action be taken, including the filling of any vacancies, ~~be filled~~ by the next quarterly meeting.

Article IV – Membership, Terms of Office, Vacancies, Removal from Office

A. Membership

1. As defined in City Ordinance 126679, the Working Group shall consist of:
   a. Seven members; four appointed by the Mayor and three by the Council.
   b. At least five members of the Working Group shall represent equity-focused organizations serving or protecting the rights of communities and groups historically subject to disproportionate surveillance, including Seattle's diverse communities of color, immigrant communities, religious minorities, and groups concerned with privacy and protest.
   c. The seven positions on the Working Group shall be numbered one through seven.
2. Each Working Group member shall be expected to:
   a. Read and adhere to the Working Group Bylaws.
   b. Read all SIRs, public comments and provide to the Working Group, as appropriate, informed comments, and assessments of potential impact of surveillance technologies on civil rights and liberties, including the potential disparate impact on communities of color and other marginalized communities.
   c. Respond in a timely manner to communications that require a response.
   d. Attend quarterly meetings. To remain in good standing, members must attend at least 75% of quarterly Working Group meetings per calendar

year. Members must provide advance notice to the co-chairs of any planned absences or schedule conflicts. By simple majority, the Working Group can vote to recommend the removal of ~~remove~~ any member not in good standing after three unexplained absences. Recommendations to remove members shall be sent by the co-chairs in writing to the appointing agency.

3. The Working Group shall be staffed by the Executive Department with Central Staff input.

B. Co-Chairs

1. The Working Group shall elect two co-chairs from within its membership, each of whom shall be selected annually.
   a. Co-chairs may self-nominate or be nominated by a fellow member. Any member nominated by another must accept the nomination before voting begins.
2. Co-Chairs shall preside over Working Group meetings, set agenda items, sign all official documents of the Working Group, and delegate duties to other members.
   a. Working Group members can request the addition of agenda items by sending notice to Co-Chairs at least a day before regularly scheduled meetings.
3. Co-Chairs shall encourage participation by all members of the Working Group by fostering a collaborative and inclusive environment.
4. Co-Chairs may grant a member's request that a designated alternate represent them at a maximum of two meetings per year. Designated alternatives must be another member of the Working Group.
5. By permission of the Co-Chairs, additional guests may be invited in a participatory capacity, excluding the right to vote, for a given meeting. Such requests must be made at least 10 business days in advance of the meeting at which the guest would appear.
6. In the event that both Co-Chairs are absent or unable to perform their duties, their duties will be assumed by their designee, or by a member approved by the majority of members present.
7. In the event a Co-Chair must resign their position, the Working Group shall elect a replacement Co-Chair at the next meeting or as soon as practicable.

C. Terms of Service, Vacancies, and Conflicts

1. The initial terms of odd-numbered positions shall be two years and the initial terms of even-numbered positions shall be three years. All subsequent terms shall be for three years. Working Group members may serve up to two consecutive terms.
2. Any vacancy in an unexpired term shall be filled in the same manner as the original appointment.
   a. The Working Group shall notify the Council and Mayor of any vacancies and request vacant positions be filled by the next quarterly meeting, following the final meeting attended by the departing member.
   b. A member whose term is ending may continue on an interim basis as a member with voting rights until such time as a successor for that position has been appointed.
   c. If a member cannot attend a meeting, they may request another member act as their proxy by providing their input, opinions, and concerns. Proxies cannot vote on behalf of an absent member.
   d. Should a member resign or cease to be a member for any reason before the expiration of the member's term, a successor may be appointed by the designating authority.
3. If any member of the committee concludes that they have a conflict of interest or an appearance of fairness problem with respect to a matter that is pending before the committee, so that they cannot discharge their duties on the committee in that matter, they shall disqualify themselves from participating in the deliberations and the decision-making process with respect to the matter.

Article III. Rules of Procedure

A. Schedule and Location

1. The Working Group shall meet at least once per quarter. Additional meetings may be scheduled as needed to facilitate the Working Group meeting all necessary deadlines.
2. Members of the Working Group will participate remotely while the Governor's Order on physical distancing measures is in place and while the Seattle City Council is conducting its meetings remotely.
   a. When such restrictions are lifted, the Working Group shall vote on whether to continue to meet remotely or at a physical location approved by the Working Group members.
3. The time, date, and location of Working Group Meetings shall be posted on the City's website at least one week in advance.

B. Decision-Making

1. Quorum must be established for voting to take place at any Working Group meeting. A minimum of four Working Group members must be present to establish quorum at any meeting.
2. Decisions shall be made by consensus or by majority vote. Items put to a vote require majority approval of the Working Group members.
3. Minority or dissenting opinions will be recorded in meeting minutes and in final recommendations.

B. Impact & Equity Assessments and Recommendations to Council
1. The Working Group shall provide its privacy and civil liberties 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.
1. A request for a two-week extension may be sent to the City Council in writing. If the Working Group fails to submit an impact assessment within eight weeks of receiving the SIR, the department and City Council may proceed with ordinance consideration without the impact assessment.
2. The Working Group members shall vote on recommendations to include in privacy and civil liberties impact assessments and comments on the CTO's annual equity impact assessments. 2016 CVH 00926
   a. Working Group members will individually review SIRs and discuss their comments and opinions at the next regularly scheduled meeting.
   b. Co-Chairs will summarize the Working Group's opinions and comments into recommendations for the impact assessments. Co-Chairs can delegate this duty to another Working Group member.
   c. Final recommendations will be sent to Working Group members for review before Co-chairs draft final versions of Working Group assessments to the Council.
   d. Minority or dissenting opinions will be noted in the final recommendations to the Council and CTO.
3. The Working Group may develop tools to encourage a standardized approach for review and communications including:
   a. Templates or checklists for each impact assessment.
   b. The length of time for each period of review.

C. Public Access, Engagement and Records
1. All meetings of the Working Group shall be open to the public and all meeting minutes, recordings and final documents and reports to the Council shall be made available to the public and posted by the Chief Technology Officer to the City's website.

2. Meeting minutes shall be taken by a Working Group member designated at the beginning of each meeting and shall be approved for each meeting by the Working Group at the following meeting.
3. The Working Group shall provide assistance as resources permit to the Executive and Council in ensuring members of vulnerable communities have the opportunity to provide input and feedback on Surveillance Technologies through the SIR approval process.
4. All public engagement sessions shall be attended by at least one member of the Working Group.

Article VII – Amendments

Amendment(s) to the Working Group Bylaws shall be made by written resolution submitted at a regularly scheduled meeting and will not be voted upon until the next regularly scheduled meeting.

Appendix B: Comments by Community Surveillance Working Group

Per the ordinance, the CTO engaged the co-chairs of the CSWG to provide feedback and comments on this report. Comments relating to specific technologies, policies, or opinions provided by the co-chairs are shown here, and changes/corrections/clarifications suggested by the co-chairs have been incorporated into the document where applicable.

Re: Public Comment Analysis Themes

At a minimum, the FLIR cameras used by KCSO ASU was highlighted in public comments that SPD disproportionately deployed in over the SE Seattle neighborhoods.

Re: Recommended Policy and Legal Adjustments

These seems to be only about Group 1 SIRs and the statement "more frequent concerns about exempted tech" was only more frequent for Group 1, not Group 2 & 3, seems to minimize the valid feedback that was given on Groups 2 & 3.

Re: Recommended Policy and Legal Adjustments

It would be helpful to include that there have been repeated public comments about SPD not clearly answering the public questions at engagement events, by either stating they don't know the answers and/or telling the public to submit PRA requests, which would take too long in time to submit public comment.

Re: Policy Collaboration

I don't think this framing around surveillance technologies is helpful. A technology can be bad regardless of the department using it. SDOT surveillance data does not only stay within SDOT (e.g., SPD access to SDOT CCTV). If SDOT has a concerning surveillance technology, they should be subject to public scrutiny.

Appendix C: Surveillance Public Comment Analysis Overview and Summary

Definitions

*Note: some comments may contain multiple themes, therefore theme counts do not correspond with total comments.

Data Management

Concerns expressed on any part of the data lifecycle, including third party use, storage, and retention

Policy, Enforcement, and Oversight

Related to department and City policy, oversight, accountability, transparency, audit and policy enforcement

Government Overreach and Civil Liberties

Government unnecessarily or over surveilling in a way that could impact individual rights and civil liberties

Unconcerned

Expressed a lack of concern around technology use or interest in expansion of use

General

Nondescript concern or a concern that is not applicable to the specific technology

Public Safety

All applications of public safety from traffic and transit, to emergency response, and law enforcement

Group 1 Comments

Theme	Count
Data Management	31
Policy, Enforcement, and Oversight	22
Government Overreach and Civil Liberties	6

Group 2 Comments

Theme	Count
Government Overreach and Civil Liberties	17
Data Management	14
Policy, Enforcement, and Oversight	8
General	3
Unconcerned	2
Public Safety	1
Policy Recommendations	1

Group 3 Comments

Theme	Count
Government Overreach and Civil Liberties	23
Policy, Enforcement, and Oversight	16
Data Management	7
Unconcerned	4

Group 4 Comments

Theme	Count
Data Management, Security, and Use	20
Transparency	17
Government Overreach and Civil Liberties	11
Policy, Enforcement, and Oversight	10
SIR Report or Process	7
General	6