



# KING COUNTY AUDITOR'S OFFICE

JUNE 14, 2022

## Traffic Enforcement: Strategies Needed to Achieve Safety Goals

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### Executive Summary

The King County Sheriff's Office does not provide strategic direction for traffic enforcement and has not assessed whether its efforts align with overall King County values. Since March 2020, the number of traffic stops conducted by officers has declined in comparison to 2019 averages. However, this trend is not identical across Sheriff's Office jurisdictions; by mid-2020, contract partners with dedicated traffic enforcement returned to a higher level of traffic stops in comparison with the rest of the Sheriff's Office. Contract partners and Sheriff's Office leaders cited safety as the primary reason for conducting traffic enforcement, but Sheriff's Office management does not systematically assess whether its traffic enforcement activities increase safety, or whether there are disparities in how its officers conduct traffic stops. Without data-driven operational goals, the Sheriff's Office may not be effective in addressing traffic safety risks.



**King County**

## Content Warning, Terms, and Values

### **This report contains references to police use of force.**

If you have concerns about specific interactions with law enforcement in King County, there are resources to assist you with filing a formal complaint.

The King County Office of Law Enforcement Oversight (OLEO) is available to help with any complaints, questions, or comments regarding the Sheriff's Office. Contact OLEO by calling 206-263-8870 or by emailing [OLEO@KingCounty.gov](mailto:OLEO@KingCounty.gov). For more information about filing complaints, visit the following web page:

- <https://kingcounty.gov/independent/law-enforcement-oversight/complaints.aspx>

You may also file a complaint directly with the King County Sheriff's Office by calling 206-263-2525 or visiting the following web page:

- <https://kingcounty.gov/depts/sheriff/about-us/contact/complaint.aspx>

**Language is an important tool for advancing equity and accountability, and data systems sometimes include words that lag behind the evolution of terms.** The report generally uses words from the technical definitions and original data sources, with some exceptions. For example, the computer-aided dispatch system data used in our analysis references "accidents," but in the report we use the term "collisions" as that term is commonly accepted as more neutral. Similarly, we use the racial identifiers White and Black in a paragraph regarding traffic stop use of force data; there are other racial identifiers within the data sets involved, but we do not address the potential limitations in those categories here because the analysis results were not statistically significant.

**The King County Auditor's Office is committed to equity, social justice, and ensuring that King County is an accountable, inclusive, and anti-racist government.** While planning our work, we develop research questions that aim to improve the efficiency and effectiveness of King County government and to identify and help dismantle systemic racism. In analysis, we strive to ensure that communities referenced are seen, not erased. We promote aligning King County data collection, storage, and categorization with just practices. We endeavor to use terms that are respectful, representative, and people- and community-centered, recognizing that inclusive language continues to evolve. For more information, see the King County [Equity and Social Justice Strategic Plan](#), King County's [statement on racial justice](#), and the King County [Auditor's Office Strategic Plan](#).

## Acknowledgment

**We would like to thank the King County Sheriff's Office for its responsiveness to the audit team's requests and its assistance and engagement throughout the audit process while the office continues to navigate the ongoing pandemic and a changing leadership environment.** The Sheriff's Office is undergoing a period of rapid change: transitioning to an appointed Sheriff, ongoing and significant hiring challenges in an extremely tight labor market, and operational effects from the COVID-19 pandemic. Despite these challenges, Sheriff's Office staff was quick to answer our questions and was very helpful in connecting the audit team with key personnel across the county and with representatives from its multiple contract partners.

**We also appreciate the assistance provided by precinct commanders, chiefs of contract partner jurisdictions, patrol sergeants and officers, and city managers of contract partners.** Throughout the audit process, Sheriff's Office commanders were generous with their time in meeting and responding to the audit team's questions, offering insight into the specific concerns and operations of their particular jurisdictions. The information they provided helped the audit team interpret traffic stop and traffic enforcement-related data, leading to a report that is more responsive to the varying circumstances and geographies found across King County.

# Traffic Enforcement: Strategies Needed to Achieve Safety Goals

## REPORT HIGHLIGHTS

### What We Found

Since March 2020, the number of traffic stops conducted by the Sheriff's Office declined in comparison to 2019 averages. Sheriff's Office staff reported that the COVID-19 pandemic, changes in state law, and staffing shortages caused the decline. However, this trend was not identical across county jurisdictions; by mid-2020, contract partners with officers dedicated to traffic enforcement returned to a higher level of traffic stops in comparison with the rest of the Sheriff's Office.

Sheriff's Office staff cited safety as the primary reason for traffic enforcement, but management does not regularly assess whether its traffic enforcement activities have an impact on safety. It also does not examine whether there are disparities in how its officers conduct traffic stops. The Sheriff's Office does not systemically collect demographic data for traffic stops, although this data is available for stops that result in a use of force. Using that limited data, we found that although few traffic stops resulted in a use of force, for those that did, White officers were more likely to use force upon Black motorists than motorists of other races.

The Sheriff's Office does not identify strategies to help it attain its goals for traffic enforcement or assess whether its traffic enforcement efforts align with overall King County values, despite best practice and its own policy guidance. Regionally and nationally, jurisdictions are employing strategies to reduce the inequities that can result from traffic enforcement. However, identifying and implementing promising practices depends on aligning them with clear county goals and strategies.

### What We Recommend

We make recommendations for the Sheriff's Office to improve data collection practices, improve the clarity and communication of its traffic enforcement goals, and provide more central support and guidance related to traffic enforcement.

### Why This Audit Is Important

Traffic stops are the third most common patrol action taken by officers countywide. At the national level, research finds evidence of racial profiling and bias in traffic stops and arrests. One major study found that "police stops and search decisions suffer from persistent racial bias and point to the value of policy interventions to mitigate these disparities." Accordingly, many jurisdictions, including Seattle, have taken steps to reduce or alter the way police engage in traffic enforcement. As King County transitions to an appointed Sheriff, information on where and why the Sheriff's Office conducts traffic stops may be useful to policy-makers when they consider changes to traffic enforcement in King County, and what the effects of those changes may be on issues such as safety, equity, and officer training.

Traffic enforcement has decreased.



Source: King County Auditor's Office analysis of Sheriff's Office dispatch data, 2019–2020

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# Traffic Enforcement in King County

## SECTION SUMMARY

**Traffic enforcement directly relates to public safety, but traffic enforcement practices and priorities vary across King County.** Per King County Sheriff's Office calls for service data, traffic stops are the most common interaction between Sheriff's Office officers and the public, and are largely driven by traffic enforcement. Some contract partners heavily emphasize traffic enforcement and have correspondingly high numbers of traffic stops and traffic citation rates. Meanwhile, unincorporated areas of the county have considerably fewer traffic stops in proportion to their overall calls for service workload and higher rates of non-moving violations, such as "defective equipment," among the stops that do occur. The COVID-19 pandemic and recent changes to state law contributed to decreased levels of traffic stops overall in 2020 and 2021, but these decreases were not equally distributed across Sheriff's Office jurisdictions. Beyond state law changes and the ongoing pandemic, the observed differences between contract partners and unincorporated areas are likely influenced by factors including officer discretion, staffing shortages, and the influence that Sheriff's Office leadership affords contract partners to set their local policing strategies and priorities. This section discusses the differences in traffic enforcement across King County jurisdictions; their relationship to public safety is addressed in section 2.

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## Traffic stops are the most common interaction between officers and the public

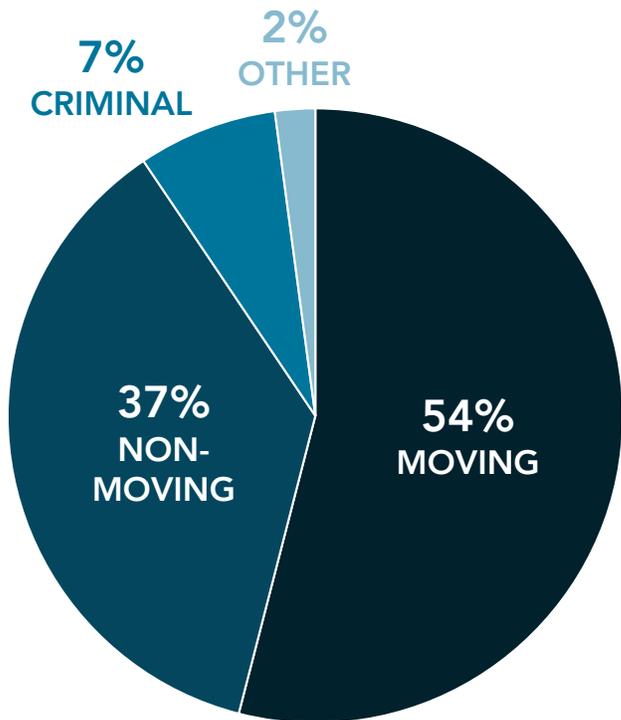
**Traffic stops are a substantial part of Sheriff's Office patrol workload.** Traffic stops are the third most common patrol action taken by officers, with officers initiating approximately 62,000 stops from 2019–2021, representing 5.35 percent of all calls for service.<sup>1</sup> Calls can either be dispatched via 9-1-1 or "on-view"—that is, initiated by the officer—and traffic stops are almost entirely the latter; just 31 stops were not initiated by an officer over those three years. The most common circumstances for traffic stops include moving violations (those related to driving a vehicle) and non-moving violations (those related to equipment, licensing, and the like), along with criminally-related stops and other circumstances (see exhibit A). Together, non-criminal moving and non-moving violations make up over 90 percent of all traffic stops in King County.<sup>2</sup>

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<sup>1</sup> The two categories of calls that the Sheriff's Office responds to more frequently than traffic stops are area checks and park closure checks, making traffic stops the most frequent call where officers are involved in one-on-one interaction with the public.

<sup>2</sup> Criminal stops include outcomes for both moving and non-moving violations. For example, a traffic stop resulting in an arrest for vehicular assault is both a crime and a moving violation. See WAC 308-104-160. "Other" traffic stops include tasks not directly related to violations, such as citizen assistance.

EXHIBIT A: Major categories of traffic stops conducted by Sheriff's Office officers, 2019–2021.



Source: King County Auditor's Office analysis of Sheriff's Office computer-aided dispatch data



**TRAFFIC VIOLATIONS**

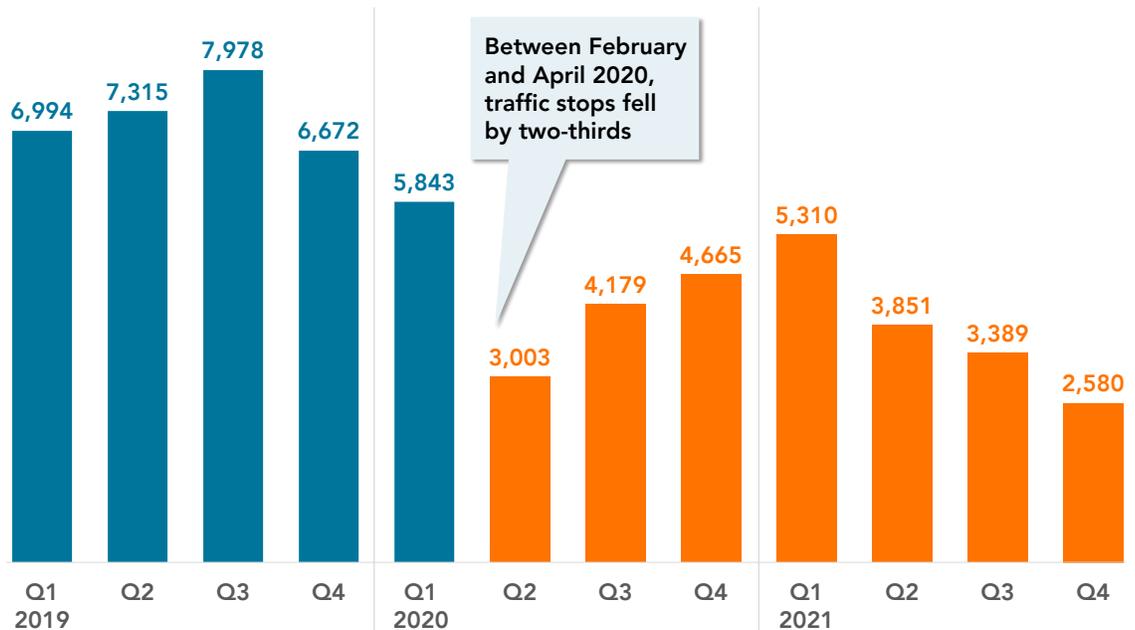
A traffic violation can be either a civil infraction or a crime, and either moving or non-moving in nature. For example, driving under the influence of alcohol is a criminal misdemeanor (i.e., punishable by jail), while speeding is a civil infraction (punishable by fines). Both are moving violations because they are directly related to operating a vehicle. Similarly, driving with a suspended license is a misdemeanor, while having expired tabs is a civil infraction, but both are non-moving violations.

An individual traffic stop can progress from an infraction to a crime or include multiple violations. For example, a traffic stop initially made for speeding can then include a driving with license suspended violation.

Traffic enforcement decreased significantly at the beginning of the COVID-19 pandemic

**There has been an overall reduction in traffic enforcement in King County since April 2020.** In March 2020, at the beginning of the COVID-19 pandemic, then-Sheriff Johanknecht instructed officers to stop nearly all traffic enforcement (see exhibit B). She took this step to protect officers and the public from close contact with one another. Between February and April 2020, traffic stops fell by two-thirds. Although they have increased since, traffic stops have not returned to pre-pandemic rates. Traffic stops have not only been decreasing in King County; decreases in traffic enforcement are mirrored across the state.<sup>3</sup>

EXHIBIT B: The overall number of traffic stops conducted by the Sheriff’s Office has decreased since the COVID-19 pandemic began in March 2020.



Source: King County Auditor’s Office analysis of Sheriff’s Office computer-aided dispatch data, 2019–2021

<sup>3</sup> “Court data shows fewer infractions were filed [statewide] in December 2021 than in any month in the previous two years, except for April 2020. The total in December of last year was less than half what it was in December 2019 and down a third from December 2020, even as traffic volume on state highways was off by just 5%.” Drivers are getting fewer tickets even as WA traffic goes back to normal. Why? David Kroman, Seattle Times, February 13, 2022.

Factors beyond COVID-19 contributed to the decrease in traffic enforcement

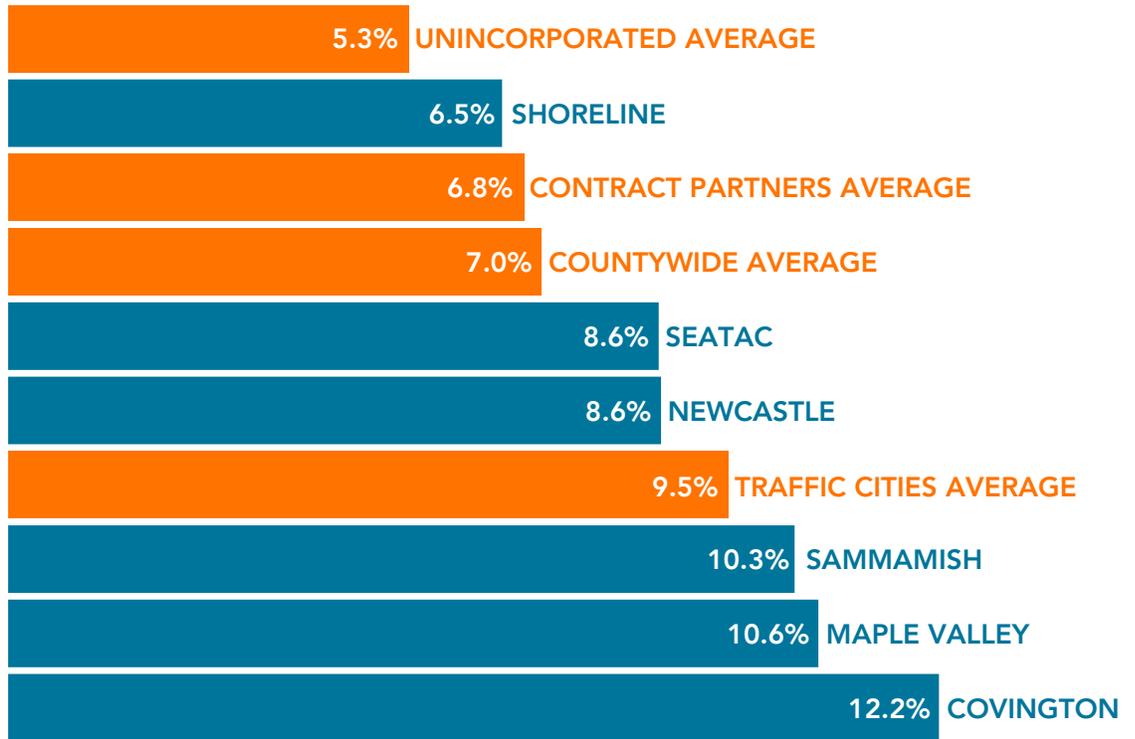
**The decline in Sheriff’s Office traffic enforcement since April 2020 is not entirely in response to COVID-19, but includes other operational challenges: difficulty filling staff vacancies and changes in state law.** The Sheriff’s Office, like many law enforcement agencies, reports it is experiencing a staffing shortage because of retirements, economic conditions, and the long gap between recruitment and training of new officers to their full deployment. Staff vacancies impact the number of traffic stops in two ways: first, traffic enforcement positions can be left vacant in favor of regular patrol assignments, and second, patrol officers need to be able to respond to higher risk call types and therefore are conducting fewer traffic stops. Sheriff’s Office leaders explained that, in some parts of King County, there may not be enough officers on duty to support proactive traffic enforcement.

In addition, Sheriff’s Office staff suggested that policing is trending from proactive toward reactive enforcement due to changes to state law restricting vehicle pursuits and limiting allowable parameters for the use of force. Officers have discretion in choosing whether to conduct traffic enforcement, and Sheriff’s Office leaders noted that the increased requirements in law may correspond to a lower willingness to conduct traffic stops to reduce the risk of potential negative outcomes. The Sheriff’s Office data show that traffic enforcement dropped after July 2021, the same month the new laws took effect.

Some contract partners have dedicated traffic units and higher rates of traffic stops

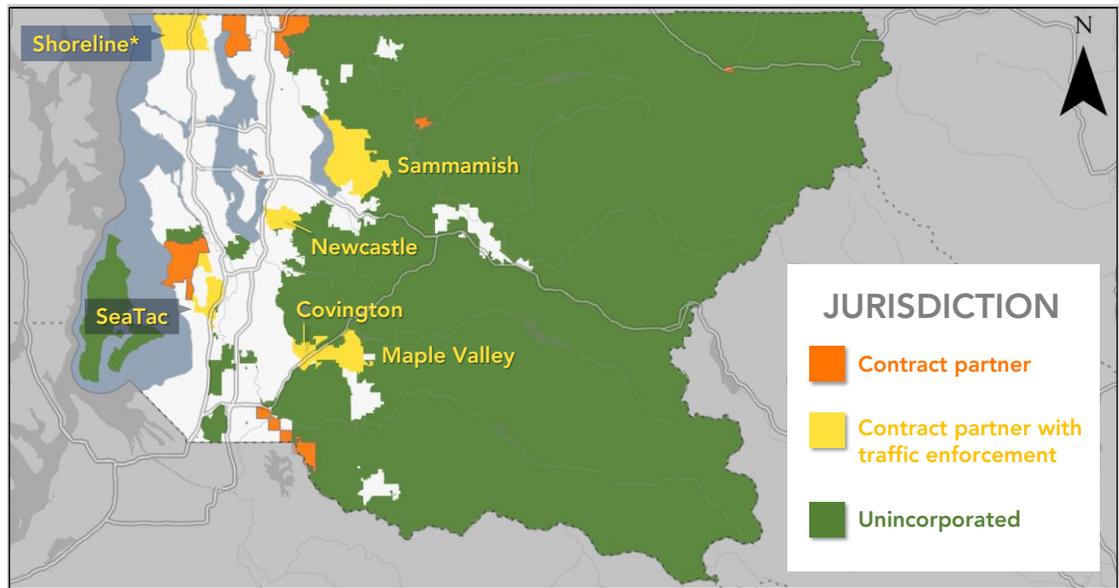
**Some contract partners have dedicated traffic units, officers, and equipment, corresponding to higher rates of traffic stops in those areas.** Among King County’s contract partners, some have dedicated traffic enforcement units (see exhibit D). These cities have a correspondingly higher ratio of traffic stops than the countywide average (see exhibit C). These units are tasked with traffic enforcement in two different ways. Some cities, under their contract agreement with King County, pay an additional cost for traffic enforcement units, primarily motorcycle units. Others designate particular patrol officers to traffic enforcement. Exhibit C, below, shows these cities (“traffic cities”) in comparison with contract partners and the countywide average. Of note, Shoreline’s ratios are lower than the others; its contract agreement designates five patrol units specifically for traffic enforcement, but these positions were all vacant as of March 2022 due to the Sheriff’s Office’s staffing challenges.

EXHIBIT C: Contract partners with dedicated traffic enforcement units conduct more traffic stops as a percentage of total calls for service than other contract partners or unincorporated King County.



Source: King County Auditor’s Office analysis of Sheriff’s Office computer-aided dispatch data, 2019–2021

EXHIBIT D: Some jurisdictions have dedicated traffic enforcement units.



\*Shoreline’s dedicated traffic enforcement positions are all vacant as of March 2022.

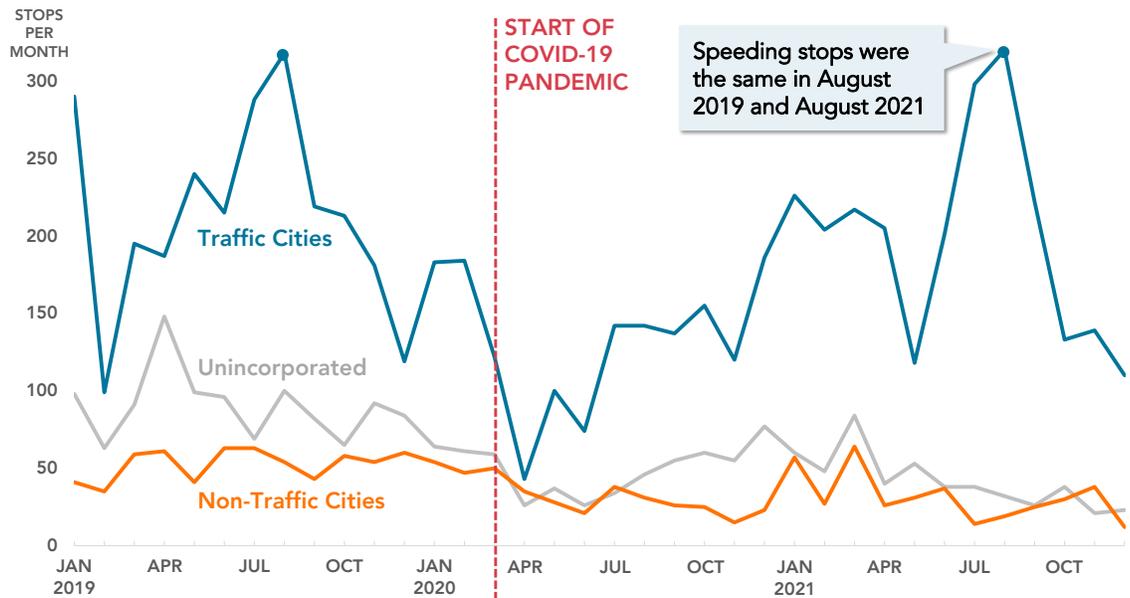
Note: To reflect our analysis of King County population, this exhibit excludes locations where the Sheriff’s Office provides policing services for Metro Transit, Sound Transit, King County International Airport-Boeing Field, and marine jurisdictions.

Source: King County Auditor’s Office analysis of Sheriff’s Office information

Traffic stops are concentrated in cities with traffic enforcement units

**Since April 2020, contract partners with traffic enforcement units returned to higher rates of traffic enforcement compared to the rest of King County, concentrating its intended benefits.** As explained above, traffic stops dropped significantly across all Sheriff’s Office jurisdictions in March 2020, and have remained lower, on average, than 2019 rates. However, practices across the County since March 2020 have differed, in some cases significantly. For example, by 2021 the rate of speeding enforcement among contract partners with traffic enforcement units matched the peak rate of 2019, while for other areas of King County the number of speeding stops remained low (see exhibit D). This means that traffic stops are increasingly concentrated in those jurisdictions with traffic enforcement functions. In turn, this means that the intended benefits of traffic enforcement are increasingly concentrated in those areas, along with any potential traffic stop risks.

EXHIBIT E: Officers in contract partners with dedicated traffic enforcement units conduct more speeding stops on average than officers in other contract partners within unincorporated King County.



Source: King County Auditor’s Office analysis of Sheriff’s Office computer-aided dispatch data, 2019–2021

**Contract partners guide their traffic enforcement priorities**

**Contract partners’ concerns directly inform traffic enforcement strategies and influence traffic stop outcomes in their jurisdictions.** Contract partner police commanders and city managers we interviewed reported that many factors influence how they set traffic enforcement priorities and, in turn, what the most common outcomes of their traffic stops are. For instance, some cities choose to focus their traffic enforcement on speeding, while others focus on crime prevention. See exhibit F for information from two contract city partners: the City of SeaTac, and the City of Sammamish. Section 2 describes how contract partners set policing priorities.



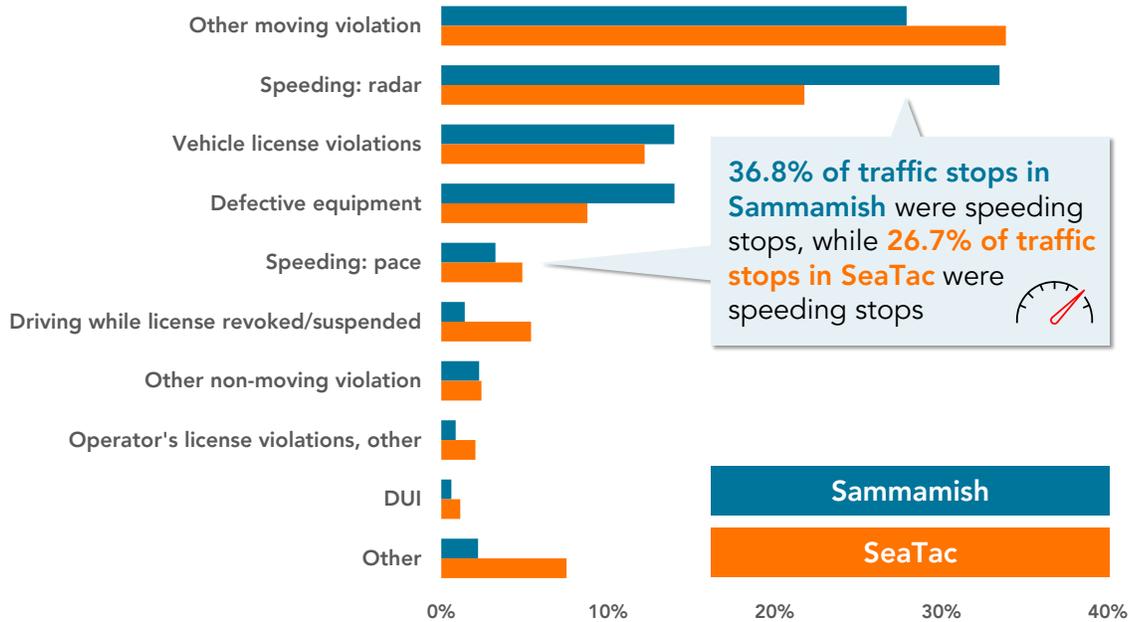
### **CASE STUDY: A COMPARISON OF TWO CONTRACT PARTNERS**

The cities of Sammamish and SeaTac each had just over 6,000 traffic stops between 2019 and 2021, and both have dedicated motorcycle traffic enforcement units; however, the outcomes of traffic stops in each city are slightly different due to infrastructure and strategy.

**SeaTac** has a significant volume of traffic compared to its population, including a large visitor population. Leaders in SeaTac stated that crime prevention and safety are both aims of its traffic enforcement strategy. The city is the major crossroads for multiple highways, along with the Seattle–Tacoma International Airport. Accordingly, it has challenges in managing pedestrian safety in a dense community. SeaTac has higher rates of “other moving violations”—stops for things like illegal turns and running red lights—than other partner cities, but lower rates of speeding violations. It also has higher rates of license suspension violations than other partner cities which leaders suggested could be attributed to the socioeconomic conditions of the area.

**Sammamish** is comparatively less dense, but with a large number of schools in areas on two-lane roads without other traffic infrastructure. This translates to higher roadway speeds, and correspondingly much greater focus on speeding enforcement by the city’s police officers. Leaders in Sammamish stated that safety is a main goal of its traffic enforcement strategy. Sammamish’s stops for some non-moving violations, such as defective equipment, are higher than in SeaTac—but it has a lower rate of licensure-related violations and criminal outcomes.

EXHIBIT F: The cities of Sammamish and SeaTac had a comparable number of traffic stops between 2019 and 2021, but reasons differ.



Source: King County Auditor’s Office analysis of Sheriff’s Office computer-aided dispatch data, 2019–2021

**King County cut unincorporated traffic enforcement in 2012**

**King County has not had a dedicated traffic enforcement unit for unincorporated areas since 2012.** In 2012, the County eliminated the Selective Traffic Emphasis Patrol (STEP) in unincorporated King County due to budget cuts to the County’s Road Fund. STEP consisted of six motorcycle deputies and a sergeant that focused on traffic enforcement; the Sheriff’s Office reassigned the STEP officers to regular patrol. At the time, the County Executive justified the cuts leading to the unit’s elimination based on decreased need due to annexations and incorporations. The County’s Road Fund has since continued to support traffic enforcement in unincorporated areas consistent with state law, but as part of regular patrol. Sheriff’s Office commanders noted that they did not routinely meet with the Department of Local Services Road Services Division staff to evaluate traffic safety concerns. In turn, this may limit the effectiveness of the traffic enforcement that does occur in unincorporated King County, discussed in more detail in section 2.

Unincorporated King County has lower traffic enforcement rates

**Unincorporated areas of King County have lower traffic enforcement rates, but a higher proportion of non-moving violations among traffic stops compared to contract partner patrol areas.** Traffic stops are not made as frequently in unincorporated areas compared to contract partner jurisdictions—especially those with traffic enforcement units. However, officers in unincorporated King County make more traffic stops for defective equipment and other non-moving violations. These stops make up roughly one-fourth of unincorporated traffic stops, compared to one-sixth of contract partners. Officers’ vehicles in unincorporated King County often do not have radar guns to identify speeding drivers, so it is more difficult for officers to conduct speeding stops. Sheriff’s Office leaders also stated that defective equipment stops may be more common in unincorporated areas because they can be less subjective in comparison to other stops. Officers-in-training work unincorporated patrol and might make stops for broken taillights or similar non-moving violations because these are a more obvious or easily identifiable violation.



# Management and Oversight of Traffic Enforcement

## SECTION SUMMARY

**The Sheriff’s Office does not provide direction on traffic enforcement approaches for itself or its contract partners, contributing to a wide variation in priorities and practices across King County, while limiting awareness about its effectiveness.** Altogether, widely varying traffic priorities and persisting data limitations mean that the Sheriff’s Office has not assessed whether its traffic enforcement efforts align with overall King County values nor whether they are meeting their stated goal of improving safety. The Sheriff’s Office also does not systematically and regularly assess whether there are disparities in how its officers conduct traffic enforcement. This is largely due to poor data collection practices for records of police interactions, resulting in the Sheriff’s Office lacking demographic information to assess the extent and cause of disparities in traffic enforcement. The race and demographic information that the Sheriff’s Office does collect is inconsistent or otherwise of questionable reliability—we discuss these systemic issues in greater detail in the 2022 audit “[Sheriff’s Office Data Shows Racial Disparities, Potential to Expand Alternative Policing](#).” We found racial disparities in the rate of use of force when White officers pull over Black motorists. Identifying and correcting for these disparities will likely require stronger direction and administration from Sheriff’s Office leadership—including data analysis and goal setting. However, contract partners set their own policing priorities, which may create barriers to implementation if King County leaders shift traffic enforcement policy.

## Safety and crime reduction are both cited as goals for traffic enforcement

**Nationally there are two major goals police may seek to achieve by conducting traffic stops: increasing traffic safety and reducing crime.** Police departments and academic studies link traffic stops and traffic-related law enforcement with two parallel goals: reducing vehicle collisions and preventing non-traffic-related crime.<sup>4</sup> Of the Sheriff’s Office staff we interviewed, traffic safety was commonly cited as the main goal of traffic enforcement, but some also mentioned crime reduction. National best practice encourages linking these goals with location-based collision and calls for service data. By doing so, police agencies can connect goals with traffic enforcement operations.<sup>5</sup>

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<sup>4</sup> See, e.g., “Data-Driven Approaches to Crime and Traffic Safety (DDACTS)—A Historical Overview, National Highway Traffic Safety Administration (July 2013) <https://www.nhtsa.gov/staticfiles/nti/pdf/809689.pdf>

<sup>5</sup> The Data-Driven Approaches to Crime and Traffic Safety (DDACTS) is a “partnership among the Department of Transportation’s National Highway Traffic Safety Administration, and two agencies of the Department of Justice, the Bureau of Justice Assistance (BJA), and the National Institute of Justice (NIJ).” [https://www.nhtsa.gov/staticfiles/nti/ddacts/811185\\_DDACTS\\_OpGuidelines.pdf](https://www.nhtsa.gov/staticfiles/nti/ddacts/811185_DDACTS_OpGuidelines.pdf)

Studies of traffic enforcement have found targeted approaches are effective at collision prevention

**Studies indicate that traffic enforcement can be effective in reducing traffic-related injury and death, depending on the type of intervention.** Some studies have shown that aggressive traffic enforcement can measurably reduce traffic collisions,<sup>6</sup> and studies have linked decreases in traffic enforcement with increases in collisions and pedestrian injuries and deaths.<sup>7</sup> For instance, a study concluded that lower citation rates in Quebec, Canada, corresponded to higher collision and injury rates. However, other analysis questions the effectiveness of traffic stops generally in preventing vehicle collisions and fatalities. A cross-comparison of motor vehicle collision deaths with state patrol traffic stops from 33 states found no relationship between the two.<sup>8</sup> Alternatively, many studies examine the success of specific traffic enforcement interventions. For instance, academic analysis of “Click-it-or-Ticket” campaigns enforcing seat belt violations have shown them to be effective in reducing vehicle collisions and injuries.<sup>9</sup> This suggests that evaluating the effectiveness of traffic enforcement in improving traffic safety depends on the specific intervention and its intended goals.<sup>10</sup>

King County traffic stops rarely result in arrests for serious crimes

**Most traffic stops in King County do not lead to criminal arrests.** As explained in section 1, most King County traffic stop outcomes are directly related to traffic enforcement. Many, however, are for non-moving violations that may have a less direct link to traffic safety (see exhibit A). Under the law, officers may further investigate other possible criminal activity after a stop for a minor violation,<sup>11</sup> but some research calls this strategy into question, both in terms of efficacy and equity—as discussed further below. In King County, Sheriff’s Office leaders reported they have long de-emphasized this approach, and there does not appear to be a strong connection between traffic enforcement and crime reduction in the data. Jurisdictions with higher rates of traffic stops have lower levels of criminal outcomes from those stops. Between 2019 and 2021, just 2.4 percent of traffic stops countywide led to criminal arrests—and of those, roughly half were for misdemeanor warrants or driving with a suspended license.

<sup>6</sup> “Aggressive traffic enforcement: a simple and effective injury prevention program” <https://pubmed.ncbi.nlm.nih.gov/16688057/#:~:text=Conclusions%3A%20Aggressive%20traffic%20enforcement%20decreased,prevention%20program%20with%20immediate%20benefit.>

<sup>7</sup> See, e.g., “The effect on collisions with injuries of a reduction in traffic citations issued by police officers” <https://pubmed.ncbi.nlm.nih.gov/20876763/>.

<sup>8</sup> See, e.g., “Traffic stops do not prevent traffic deaths” *Journal of Trauma and Acute Care Surgery* [https://journals.lww.com/jtrauma/Abstract/2021/07000/Traffic\\_stops\\_do\\_not\\_prevent\\_traffic\\_deaths.21.aspx](https://journals.lww.com/jtrauma/Abstract/2021/07000/Traffic_stops_do_not_prevent_traffic_deaths.21.aspx).

<sup>9</sup> See, e.g., “Do Traffic Tickets Reduce Motor Vehicle Accidents? Evidence from a Natural Experiment” <https://onlinelibrary.wiley.com/doi/abs/10.1002/pam.21798>.

<sup>10</sup> See, e.g., “Effect of High-Visibility Enforcement on Motor Vehicle Crashes” National Institute of Justice <https://nij.ojp.gov/topics/articles/effect-high-visibility-enforcement-motor-vehicle-crashes#note3>.

<sup>11</sup> The US Supreme Court’s Fourth Amendment jurisprudence allows police to conduct pretextual vehicle stops based on minor traffic violations (*Whren vs. United States*, 517 U.S. 806 (1996).) In Washington, purely pretextual stops violate Article 1, Section 7 of the State Constitution (*State v. Ladson*, 138 Wash.2d 343 (1999)), but mixed-motive traffic stops are permissible “[s]o long as the desire to address a suspected traffic infraction (or criminal activity) for which the officer

Traffic stops can lead to biased outcomes and negative police interactions

**Research suggests that some traffic stops may have disparate impacts on communities without demonstrably decreasing crime.** Non-moving violations, such as stops for a broken taillight or other defective equipment, can then lead to further investigation into whether a crime, such as driving under the influence, has taken place. National studies have found, however, that greater numbers of traffic stops do not correspond with increased crime detection but do show increased risk of racial bias toward the drivers who are stopped. For example, a study of Berkeley, California by the Center for Policing Equity found that Black people were about 6.5 times more likely, and Hispanic people were about twice as likely, than White people to be stopped while driving. Despite these disparities, searches of Black drivers' cars yielded arrests only half as often as searches of White individuals, and searches of Hispanic individuals yielded arrests 39 percent less often than searches of White individuals. Another study conducted by New York University School of Law's Policing Project, in collaboration with the Stanford Computational Policy Lab, found that stops for non-moving violations do not appear to have a discernible effect on either long-term or short-term crime rates, and only result in a relatively small number of arrests. Indeed, some experts have suggested that police departments should consider reducing the number of some common non-moving violations, such as equipment and registration violations, because they may be ineffective in crime reduction.

Localized data collection and goal setting for traffic enforcement is a best practice

**Using both collision and crime data to determine traffic enforcement goals is a best practice.** Data-Driven Approaches to Crime and Traffic Safety (DDACTS) is an operational model from the federal National Highway Traffic Safety Administration and the Department of Justice's Bureau of Justice Assistance and the National Institute of Justice. The DDACTS model guides police departments in linking location-based data with operations to improve public safety. Using this model, agencies define the goals and objectives for traffic enforcement activities and then measure outcomes. The International Association of Chiefs of Police, among others, recommend that all law enforcement agencies adopt the DDACTS 2.0 model.<sup>12</sup> The model's benefits include its scalability and flexibility; it works for small law enforcement agencies, and it can be supported through low- or no-cost technologies.<sup>13</sup> Comparatively, agencies that do not consider their operations relative to the model's principles may not be able to evaluate traffic stops against their potential benefits or bad effects, such as biased policing or inefficiency.<sup>14</sup>

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has a reasonable articulable suspicion is an actual, conscious, and independent cause of the traffic stop. (*State v. Arreola*, 176 Wash.2d 284, 288 (2012).)

<sup>12</sup> <https://www.theiacp.org/resources/resolution/support-of-data-driven-approaches-to-crime-and-traffic-safety-ddacts-20>

<sup>13</sup> [https://www.scirp.org/pdf/jtts\\_2021042713402760.pdf](https://www.scirp.org/pdf/jtts_2021042713402760.pdf)

<sup>14</sup> [https://www.iadlest.org/Portals/0/Files/Documents/DDACTS/Docs/DDACTS\\_20\\_OpGuidelines\\_06\\_06\\_21.pdf](https://www.iadlest.org/Portals/0/Files/Documents/DDACTS/Docs/DDACTS_20_OpGuidelines_06_06_21.pdf) Principle 1, page ix.

Sheriff's Office has limited mechanisms in place to ensure it meets its traffic safety goal

**The Sheriff's Office does not have defined traffic safety-related strategies, objectives, or performance measures, limiting its ability to assess operational effectiveness.** Among the Sheriff's Office's goals, one is to "improve traffic safety by reducing impaired, unsafe driving behaviors and traffic collisions." Logically, doing so requires strategies to reduce poor driving, but Sheriff's Office commanders in unincorporated areas could not identify any specific expectations for traffic enforcement activities, such as performance measures or outcomes linked with data analysis. Instead, they noted that officers cannot be evaluated based on the number of traffic stops they conduct. Sheriff's Office leaders also could not identify any guidance shared with contract partners on how to set traffic safety priorities or compare traffic enforcement activities and results against those priorities.

According to best practice, goals should be supported by specific objectives that state what is expected to change as part of the goal, strategies that articulate pathways to achieve each objective, and measures that are used to track performance. More information on this can be found in our June 2016 technical paper, "[Goal Planning: Key Elements of a Performance Management Framework.](#)"

In contrast to Sheriff's Office central practices, leaders of contract partners and their traffic enforcement officers described activities relative to the concerns with traffic safety in their jurisdictions. Officers shared anecdotes as to how they identified safety problem areas and the actions they take to address them. Some noted regular conversations with their city manager and traffic engineer, explaining how they review and incorporate collision and speed measurement data in deciding where and how to focus traffic enforcement activities. As a result, although informal, these cities proactively assess the effectiveness of their traffic enforcement operations. Unfortunately, countywide, assessing traffic enforcement effectiveness appears limited to those contract partner efforts.

### Recommendation 1

**The King County Sheriff's Office should identify traffic enforcement objectives and develop and implement strategies for meeting those objectives, using data to track progress toward its overarching safety goal.**

Sheriff's  
Office traffic  
enforcement  
policy is  
fragmented

**Traffic enforcement policy in King County is fragmented, both within the Sheriff's Office and between the Sheriff's Office and its contract partners, impeding its capacity to assess traffic stops practices.** In March 2020, former Sheriff Johanknecht instructed officers to de-emphasize traffic stops due to the COVID-19 pandemic, but we heard varying opinions from Sheriff's Office leaders regarding that guidance—some reported it as Sheriff's Office policy, while others had not heard it or did not continue to follow it shortly thereafter. We requested written communication of the directive, but the Sheriff's Office reported that it was not disseminated in writing. Sheriff's Office leaders also did not have consistent answers regarding how they resolve hypothetical conflicts between direction from Sheriff's Office leadership with that of their contract partners. This presents two potential avenues of risk for King County: first, that current traffic stops may be inconsistent with operational strategies discussed above, and second, that the implementation of future traffic-related policy changes could be impaired by the lack of alignment between the Sheriff's Office and contract partners. Accordingly, contract partners reported that they set their own priorities with little to no engagement from Sheriff's Office management. For example, jurisdictions mentioned individual grants they had received for traffic enforcement activities that had no involvement or approval by the Sheriff's Office.

Contract partners also indicated that while they receive reports from the Sheriff's Office on certain metrics, such as call response times and the number of responses, they are not aware of any overarching goals that inform traffic response strategies nor of any related performance measures that the Sheriff's Office uses to monitor progress toward such goals. One specifically noted that it is difficult to know what questions are appropriate to ask or are answerable regarding traffic enforcement strategy given the absence of goals or measures from the Sheriff's Office. Instead, partners rely on community complaints or information from Washington state data systems to monitor progress toward achieving desired community outcomes.

Sheriff's Office policy includes a process for evaluating traffic enforcement against collision data, but the office does not appear to follow it

**The Sheriff's Office is supposed to provide direction for traffic enforcement practices based on collision data, but does not do so despite its own policy guidance.** Under the interlocal agreement (ILA) between the Sheriff's Office and its contract partners, the authority to set traffic enforcement policy resides primarily with the Sheriff's Office. Traffic enforcement is identified as one of the core functions of patrol officers under the ILA terms, and contract partners are to seek input and approval from the Sheriff's Office for their own policies and procedures. In addition, Sheriff's Office policy states that the Sheriff's Office will collect and compile collision data and share it with supervisors for use in determining patrol assignments and directing traffic enforcement.<sup>15</sup> Supervisors should compare the location and number of citations, infractions, and warnings in evaluating traffic enforcement activities, and commanders should prepare a semi-annual report comparing collision data with complaints and enforcement efforts.

In practice, none of these elements occur. Although Sheriff's Office leaders correctly pointed to the General Orders Manual (GOM) as the source of traffic enforcement policy, their descriptions of their operations and decision-making processes regarding traffic enforcement were not consistent with that in the GOM. Contract partners do not share their traffic-related priorities with the Sheriff's Office, and generally conduct their policy development on the local level. For example, one city manager noted that the Sheriff's Office does not provide support in seeking grant funding for traffic safety. In addition, staff from the Road Services Division explained that they used to share location-based information on collisions with Sheriff's Office staff, but have not done so since 2018. The process in the GOM specifically instructs Sheriff's Office staff to work with the county traffic engineer, but these meetings do not occur. Under state law, the County's Roads Services Fund pays for a proportion of traffic enforcement in unincorporated King County—\$7.5 million in 2021. Identifying operational goals could help demonstrate the value of that funding relative to traffic safety outcomes, instead of traffic stops.

## Recommendation 2

**The King County Sheriff's Office should coordinate with unincorporated area commanders, contract partners, and the King County Department of Local Services Road Services Division to ensure that traffic safety objectives and strategies are in alignment with county goals.**

<sup>15</sup> Sheriff's Office General Orders Manual 4.09.065.

Sheriff's Office's traffic enforcement policy is broad and allows contract partners to set varied priorities

**Current Sheriff's Office policy provides officers broad discretion for when to perform a traffic stop, which may be inconsistent with traffic safety-related priorities.** While officers have broad discretion in choosing whether to enforce traffic violations, they are simultaneously encouraged to enforce some non-moving violations in comparison to other traffic violations. Sheriff's Office policy states that the purpose of traffic stops is to "ensure public safety by stopping unsafe motorists," in turn altering their driving behavior.<sup>16</sup> Officers are instructed to take appropriate enforcement action for each traffic violation witnessed by or reported to them, but may use their discretion to determine the best method to deal with a violator.<sup>17</sup> Policy tells officers to take "appropriate action" for some violations, such as driving while license suspended and for "hazardous violations" such as reckless driving or improper turns.<sup>18</sup> It explicitly states that deputies may use their discretion to either warn or cite drivers for speeding violations and "non-hazardous" violations such as seat belt and/or child restraint violations.<sup>19</sup> However, Sheriff's Office policy also instructs officers to take "enforcement action" for equipment violations. Depending on the specific objectives, placing greater emphasis on defective equipment stops in contrast with speeding and seat belt violations could arguably be inconsistent with promoting traffic safety.

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<sup>16</sup> Sheriff's Office General Orders Manual 4.09.015.

<sup>17</sup> Sheriff's Office General Orders Manual 4.09.005 (<https://public.powerdms.com/KCSO/tree/documents/1758006>).

<sup>18</sup> Sheriff's Office General Orders Manual 4.09.035.

<sup>19</sup> Sheriff's Office General Orders Manual 4.09.035.

Sheriff's Office does not collect or analyze data that could help identify and address potential bias in traffic stops

**The Sheriff's Office does not collect demographic data to assess whether there are disparities in its policing practices.** Local, state, and national analyses have identified significant racial disparities in traffic stops across the United States. For example, Stanford University's Open Policing Project examined over 100 million stops from 21 state patrol agencies and 29 municipal police departments and found consistent indicators of systemic bias. Based on these assessments, multiple states have passed laws requiring collection of demographic data during traffic stops<sup>20</sup>, and the International Association of Chiefs of Police identifies collecting such data as important in addressing biased policing. Washington state law also encourages collection and analysis of traffic stop demographic data to ensure racial profiling does not occur.<sup>21</sup> However, the Sheriff's Office does not systematically collect or analyze traffic stop demographic data as part of its operations.<sup>22</sup> This means the Sheriff's Office is unable to assess potential disparities in traffic stops, although it has collected this information on a limited basis at the request of contract partners.

Racial disparities exist in traffic stop use of force data

**Although very few traffic stops lead to a use of force, we found racial disparities in the frequency of use of force when White officers stop Black motorists, highlighting the need for comprehensive data.** Despite the absence of comprehensive traffic stops demographic data, some relevant related data exists in Sheriff's Office data systems. For example, when an officer uses force, the Sheriff's Office collects information including demographic data. Although very few traffic stops lead to a uses of force (0.037 percent of traffic stops resulted in a use of force), we compared the race of officers involved in use of force incidents during traffic stops with the race of drivers involved in those uses of force and found that White officers were over two-and-a-half times more likely to use force against a Black motorist than ones of other races. This data set is not large in comparison to the number of traffic stops, but the disparity is great enough that it is statistically significant. Comprehensive data collection on traffic stops would provide additional detail to evaluate these outcomes and to what extent factors, such as competing priorities across jurisdictions or officer discretion as a result of broad Sheriff's Office policy, contribute to such disparities.

Our 2022 audit "Sheriff's Office Data Shows Racial Disparities, Potential to Expand Alternative Policing" discusses the Sheriff's Office data system and data collection issues in more detail.

<sup>20</sup> Twenty-three states and the District of Columbia have "laws related to or requiring collection of data when an individual is stopped by law enforcement" as of a December 2020 National Conference of State Legislatures database. See <https://www.ncsl.org/research/civil-and-criminal-justice/traffic-stop-data.aspx>.

<sup>21</sup> See RCW 43.101.410(f) "Within fiscal constraints, collect demographic data on traffic stops and analyze that data to ensure that racial profiling is not occurring."

<sup>22</sup> The Sheriff's Office records information for traffic warnings and citations in the Statewide Electronic Collision & Ticket Online Records data system (SECTOR), which is maintained by Washington State Patrol. While demographic information is entered into the system for citations, this information must be requested from Washington State Patrol and is not continually monitored or analyzed by the Sheriff's Office.

### Recommendation 3

**The King County Sheriff's Office should collect perceived demographic data for each traffic stop, regardless of the purpose of the stop or its outcome. This recommendation is made in alignment with Recommendation 3 from our report "Sheriff's Office Data Shows Racial Disparities, Potential to Expand Alternative Policing," which addresses analysis of this data.**

# Alternative Approaches to Traffic Enforcement

## SECTION SUMMARY

**Jurisdictions around the United States are considering changes to their law enforcement strategies; some of these changes have been implemented or suggested in Washington.** These changes fall into three major categories: changes in law or policy to reduce the reasons officers can initiate traffic stops; creation of civilian traffic enforcement agencies; and implementation of automated traffic enforcement (see exhibit G). As King County transitions to an appointed Sheriff, decision-makers could look to these strategies as frameworks for change in King County if desired. In this section, we will provide examples from jurisdictions that are working to implement each of these models. Moving toward any of these alternatives will likely require adjustments to the Sheriff’s Office policy, could require changes to state law, and would possibly conflict with some of the priorities of the Sheriff’s Office’s many contract partners. We include considerations specific to King County throughout the section.

EXHIBIT G: Jurisdictions across the country are pursuing a variety of alternative law enforcement strategies.



Source: Map made by King County Auditor’s Office based on consultant work

National efforts aim to emphasize safety and equity, but require law and policy changes

**With the goal of emphasizing safety and equity, cities and states across the country are pursuing changes to laws and police department policies that limit traffic enforcement to issues that present immediate threats to public safety.**

Some jurisdictions are limiting officer discretion or otherwise limiting the types of offenses for which traffic stops are allowed. For example, the cities of Philadelphia and Pittsburgh recently passed ordinance changes which prohibit officers from making traffic stops for issues such as broken vehicle lights, noise violations, or registration display violations. Virginia made similar prohibitions through amendments to state law. The Los Angeles Police Department, meanwhile, made changes to its internal policies to clarify the intent of stops, stating the traffic and pedestrian stops for minor equipment violations should occur only when the officer believes that such violations or infractions significantly interfere with public safety. To help ensure compliance, Los Angeles policy also states that it will impose discipline on officers who fail to abide by the policy change. Violations in other jurisdictions that may be deprioritized include moving violations that do not present an imminent injury to individuals in the vicinity, noise violations, expired tabs, expired or missing vehicle registration, issues with display of registration plates, and equipment failures such as cracked windshields (see exhibit H).

EXHIBIT H: Some jurisdictions, such as the cities of Pittsburgh and Philadelphia, are deprioritizing secondary violations which do not present threats to public safety.

Jurisdiction	Type of Change	Violations Deprioritized / Practices Prohibited
<b>Pittsburgh</b>	Ordinance change	<ul style="list-style-type: none"> <li>• Registration of vehicles</li> <li>• Temporary registration permits</li> <li>• Display of registration plate</li> <li>• Periods for requiring lighted lamps</li> <li>• Other obstruction</li> <li>• Bumpers</li> <li>• Operation of vehicle without official certificate of inspection, where the inspection certificate was valid within 60 days of the observed infraction</li> <li>• Unlawful operation without evidence of emission inspection, where the inspection certificate was valid within 60 days of the observed infraction</li> </ul>
<b>Philadelphia</b>	Ordinance change	<ul style="list-style-type: none"> <li>• Registration of vehicles</li> <li>• Temporary registration permits</li> <li>• Display of registration plate</li> <li>• Periods for requiring lighted lamps</li> <li>• Other obstruction</li> <li>• Bumpers</li> <li>• Operation of vehicle without official certificate of inspection</li> <li>• Unlawful operation without evidence of emission inspection</li> </ul>
<b>Virginia</b>	State law amendment	<ul style="list-style-type: none"> <li>• Motorcycle, moped, or motorized skateboard or scooter noise</li> <li>• Odor of marijuana</li> <li>• Licenses issued to persons less than 18 years old, subject to certain restrictions</li> <li>• Learner's permits</li> </ul>

		<ul style="list-style-type: none"> <li>• Expired registration sticker prior to the first day of the fourth month after the original expiration date</li> <li>• Smoking in vehicle with a minor present</li> <li>• Pedestrian highway crossing</li> <li>• Taillight defect</li> <li>• Brake light defect</li> <li>• Supplemental high mount stop light defect</li> <li>• Exhaust system in good working order</li> <li>• Periods and number of required lighted lamps</li> <li>• Tinting films, signs, decals, and stickers on windshields, etc.</li> <li>• Suspension of objects or alteration of vehicle so as to obstruct driver's view</li> <li>• Safety lap belts and shoulder harnesses</li> </ul>
<p><b>Connecticut</b></p>	<p>State law repeal and substitution</p>	<ul style="list-style-type: none"> <li>• Consent searches prohibited where the car was stopped for a motor vehicle violation</li> <li>• Prohibits an officer from asking for any documentation or identification other than an operator's license, motor vehicle registration, insurance identity card or other documentation or identification directly related to the stop, when the motor vehicle has been stopped solely for a motor vehicle violation, unless there exists probable cause to believe that a felony or misdemeanor offense has been committed or the operator has failed to produce a valid operator's license</li> </ul>
<p><b>Los Angeles Police Department</b></p>	<p>Department policy change</p>	<ul style="list-style-type: none"> <li>• Minor equipment violations prohibited unless officer believes that such a</li> </ul>

		<ul style="list-style-type: none"> <li>violation or infraction significantly interferes with public safety</li> <li>• Pretextual stops prohibited unless officers are acting upon articulable information in addition to the traffic violation</li> </ul>
<b>Seattle Police Department</b>	Department policy change	<ul style="list-style-type: none"> <li>• Registration of vehicles</li> <li>• Temporary registration permits</li> <li>• Display of registration plates</li> <li>• Single head and taillight defect</li> <li>• Tinting of windshield</li> <li>• Vehicle exhaust</li> <li>• Bicycle helmets</li> </ul>
<b>Brooklyn Center, MN</b>	City council resolution	<ul style="list-style-type: none"> <li>• Consent searches prohibited for all traffic and misdemeanor violations</li> </ul>

Source: Auditor’s Office review of documents from other jurisdictions

Efforts to change Washington state laws for traffic stops introduced, but did not pass

**State laws have recently been proposed in Washington that would have prohibited traffic stops for certain violations, but the laws did not pass.** Proposed Washington state Senate Bill 5485 was introduced during the 2021 and the 2022 Regular Sessions and would prohibit traffic stops for some violations. The types of stops which would be restricted under the law are similar to the restrictions seen in Pittsburgh, Philadelphia, and Virginia. The specific violations included in the proposed legislation, and which would no longer be allowed as a means to initiate a traffic stop, were failure to keep to the right, improper turns, failure to stop, parking violations, driving without a license, vehicle registration violations, suspended licenses, and safety belt violations. This bill failed to leave committee in time for passage during the 2022 legislative session.

Changes to local ordinance or departmental policies could conflict with contract partner priorities

**The City of Seattle has pursued changes to department policy to address traffic stop priorities, but similar changes in King County could conflict with the priorities of some of its contract partners.** The Seattle Police Department (SPD) announced in January 2022 that it would de-prioritize traffic stops for violations that do not have a direct connection to the safety of other individuals. While the ordinances for such violations remain in place, SPD officers will no longer treat violations such as expired vehicle registration, bicycle helmet violations, and violations like broken windshields as primary reasons to engage a traffic stop. The Department of Public Defense (Public Defense) has suggested a similar proclamation for King County, calling for deprioritization of all secondary traffic stops including moving violations that do not present an imminent injury to individuals in the vicinity, noise violations, expired tabs, and equipment failures such as cracked windshields. Changes such as those made by SPD, other jurisdictions, or those proposed by Public Defense may be possible in King County by making changes to local ordinance and to departmental policy, however contract partner priorities may not align with these changes. Additionally, as mentioned in section 1, unincorporated officers rely on defective equipment stops to practice how to safely conduct stops. If these stops are deprioritized as a result of local policy change, alternative training opportunities may be needed.

Some jurisdictions are working to establish civilian traffic enforcement agencies

**The cities of Berkeley, CA; Brooklyn Center, MN; and Cambridge, MA have explored or are exploring the creation of non-police agencies to conduct traffic enforcement, however, each face barriers in state law and efforts remain in the early stages of development.** The City of Berkeley is at the forefront of efforts to create a civilian traffic enforcement agency. Berkeley's proposal would create a Berkeley Department of Transportation (BerkDOT) which would consolidate six police functions currently performed by the Berkeley Police Department: an unarmed traffic unit, crossing guards, parking enforcement, paving, collision investigation, and traffic control. BerkDOT would provide around 100 positions and cost \$50 million. Similar projects have been initiated but are in earlier stages in the cities of Brooklyn Center, MN and Cambridge, MA. However, all three cities are facing significant legal barriers to the creation of civilian traffic enforcement entities because in the states of California, Minnesota, and Massachusetts, only sworn officers can legally conduct traffic stops. In response to this legal constraint, to substantively move forward with these efforts, these jurisdictions would have to amend state law and the City of Berkeley is lobbying to change state law. If state law changes, the transition of traffic enforcement away from the Berkeley Police Department will also trigger collective bargaining. This is an area of ongoing change, so the full extent of issues and opportunities are not yet fully known.

Having non-sworn officers conduct traffic enforcement would require changes to Washington state law

**Due to unclear definitions in the Revised Code of Washington, changes to state law likely would be required if policy-makers wished to create an unarmed civilian traffic enforcement agency.** While the Revised Code of Washington (RCW) mentions the terms “traffic enforcement agency” or “traffic enforcement officer” when discussing traffic citations, it does not clearly define whether this refers to a sworn officer.<sup>23</sup> However, RCW defines police officers as “every officer authorized to direct or regulate traffic or to make arrests for violations of traffic regulations.”<sup>24</sup> Additionally, the RCW outlines that law enforcement agencies include any agency having as its primary function the detection and apprehension of persons committing infractions or violating the traffic or criminal laws.<sup>25</sup> The RCW remains otherwise centered on police enforcement, having specific statutes for failing to cooperate with a police officer’s request for documentation, a duty to stop, and officers having the ability to conduct a Fourth Amendment seizure.<sup>26</sup> Finally, the Infraction Rules for Courts of Limited Jurisdiction defines a citing officer as a “law enforcement officers or other official authorized by law to issue a notice of infraction.”<sup>27</sup> In total, this indicates that creating civilian entities whose duties include issuing citations, directing or otherwise directing traffic, or arresting, detaining, or otherwise apprehending violators likely would first require changes to state law.

Automated traffic enforcement is effective, but presents equity concerns

**Automated traffic enforcement strategies can effectively increase driver safety, but carry considerable privacy and equity concerns and have caused several jurisdictions to adjust practices.** The most common automated traffic enforcement tools include red light and speed tracking cameras. These tools have been credited as effective methods to increase traffic safety. In a 2017 study, the National Transportation Safety Board recommended the use of automated speed enforcement as an effective countermeasure to reduce speeding-related crashes, fatalities, and injuries. While effective, automated enforcement tools have created concerns about equity, excessive fines, and data privacy. Analysis of jurisdictions across the country found that households in majority Black and Hispanic ZIP codes received tickets at around twice the rate of those in White areas, contributing to thousands of vehicle impoundments, driver’s license suspensions, and bankruptcies. As a result of the inequities observed and the disparate impact on low-income communities, legislators in California are considering reinstating automated enforcement alongside newer measures to limit the impact on low-income residents. Some strategies under consideration include reduced fines, offering community service or installment repayment options, and prohibiting the department of motor vehicles from suspending or provoking violators’ driving privileges. Alternatively, Albuquerque, NM, has proposed a new, mobile automated system which would target excessive

<sup>23</sup> RCW 46.64.010.

<sup>24</sup> RCW 46.04.4141.

<sup>25</sup> RCW 10.93.020 (3).

<sup>26</sup> RCW 46.61.020, 46.61.021 and 46.61.022.

<sup>27</sup> IRLJ 1.2(j).

speeding but not low-level speeding. Additionally, all resulting citations there would be civil rather than criminal. Although automated enforcement strategies are legal in Washington state, equity and privacy concerns, as well as priorities and preferences of the Sheriff's Office's multiple contract partners may present considerable barriers to widespread implementation in King County. Based on a community advisory committee regarding the use of traffic enforcement cameras in King County, the Road Services Division has previously recommended against implementing traffic enforcement cameras due to equity concerns and the community feedback they received.

### Conclusion

Traffic enforcement is a large portion of the Sheriff's Office's workload and is one of the most common interactions between residents and law enforcement. We found that in King County, some contract partners heavily emphasize traffic enforcement and have correspondingly high numbers of traffic stops and speeding citation rates. This is partially a result of the influence contract partners have in setting their own local policing strategies and priorities, which allows for widely varying traffic priorities. Persisting data limitations mean that the Sheriff's Office has not assessed whether its traffic enforcement efforts align with overall King County values nor whether they are meeting their stated goal of improving safety. We found racial disparities in the use of force rate when White officers pull over Black motorists. Identifying and correcting for these disparities will likely require stronger direction from central Sheriff's Office administration and leadership; however, contract partners set their own policing priorities, which may create challenges if King County leaders want to shift priorities in areas such as traffic enforcement.

Jurisdictions around the United States are considering or have enacted changes to their law enforcement strategies that could serve as frameworks for change in King County, if desired. Moving toward any of these alternatives will likely require adjustments to Sheriff's Office policy, could require changes to state law, and would possibly conflict with some of the priorities of the Sheriff's Office's many contract partners.



## Appendix 1

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### Computer-Aided Dispatch Data Limitations

**Computer-aided dispatch (CAD) data helps show police operations related to traffic stops, but the data has limitations.** CAD data include multiple variables; two elements are key to understand here. The first is call type: when an officer initially responds to an event and takes action, they indicate the call type for the action. The second is outcome: what the call type was reported to be when it was completed. These two elements provide valuable insight into Sheriff's Office operations, but they also include a gap in that, taken together, they don't always provide the underlying reasons for the call outcome.

**Call types:** Call types fit into two basic categories: called-in and on-view. When officers respond to a dispatched call from 9-1-1, the call was "called-in." When officers respond to something they observe, the call is "on-view." For the Sheriff's Office, the vast majority of traffic stops are on-view events; out of the 61,952 traffic stops in the CAD data from 2019–2022, just 31 were indicated as called-in—roughly .05 percent. If an officer sees a traffic violation and initiates a traffic stop to enforce it, the service call is a traffic stop that was on-view.

**Report detail:** Once an officer has completed the call, they enter in CAD the "FCR." This stands for Field or First Contact Resolution, and consists of a number entered by the officer when closing out the call. Often, the FCR clearly relates back to the service call; for example, if there is a traffic stop call that results in an FCR for "speeding (radar)," one can reasonably conclude that the officer made the stop for someone speeding. And, accordingly, most traffic stops fall into FCR categories that make this type of connection between outcome and call type (see above). Sometimes, however, the connection is not direct.

**Report detail limits call type conclusions.** Because the specific call type is based on activity, there are circumstances that can be limited due to the evolution of a traffic stop. For example, an officer may initiate a traffic stop for speeding, but then discover the driver's license is suspended. Because driving with a suspended license is a crime (as opposed to speeding as an infraction), at the conclusion of the call the officer will enter the FCR as Driving with License Suspended (DWLS)—as it is a more serious matter. This means that the resulting CAD entry for the call appears as a traffic stop ending in a DWLS. This creates a gap because the data no longer provides the detail for all outcomes of the call. In the previous example, we can conclude that the reason for the traffic stop was that the officer observed speeding, but in the DWLS example, we don't know what led the officer to initiate the traffic stop, just that it occurred.



## Appendix 2

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### Consultant Report

The following consultant report was developed at the request of the King County Auditor’s Office. The consultant explored alternative traffic enforcement strategies that have been or are being pursued in jurisdictions across the United States, and gathered information on legal barriers and constraints, both nationally and in Washington state. The full report can also be downloaded from the [Traffic Enforcement audit page](#) on our website.

# Traffic Stops: Alternative Police Responses

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SUMMARY REPORT FOR KING COUNTY AUDITOR’S OFFICE

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## I. INTRODUCTION

The police make more than 20 million traffic stops per year.<sup>1</sup> It is the most common reason for the public to have contact with the police.<sup>2</sup> Many of those stops are for minor traffic violations that do not directly implicate public safety, but the United States Supreme Court has long held that officers may use these violations as a pretext to stop a car and to investigate other possible criminal activity. In the wake of tragic incidents, including the killing of Daunte Wright in Brooklyn Center, many cities, states, and police departments are reexamining their approaches to traffic stops. This report summarizes information gathered from a sample of those jurisdictions that are developing new approaches to traffic enforcement strategies.

After conducting initial research on potential jurisdictions, this report identifies three general and overlapping emerging approaches:

1. *Changes in law and policy:* Cities and states across the country have made or are proposing changes to state and local law and police department policy by narrowing the offenses for which officers can make traffic stops and when and how officers conduct consent searches.
2. *Creating civilian traffic enforcement agency:* The cities of Berkeley, California; Brooklyn Center, Minnesota; and Cambridge, Massachusetts have explored or are exploring the creation of non-police agencies to conduct traffic enforcement. However, to substantively move forward with this creation, these jurisdictions would have to amend state law.
3. *Automated enforcement:* Certain jurisdictions are moving forward with automated enforcement, although some states prohibit certain types of automated enforcement. Automated enforcement has created concerns about equity and excessive fines. Legislators have passed or are considering newer measures in California and Albuquerque to limit those hardships.

The summaries below are based on information obtained through media and publicly available information, interviews of stakeholders from jurisdictions, and the receipt of information from

<sup>1</sup> Pierson, E., Simoiu, C., Overgoor, J. et al. A large-scale analysis of racial disparities in police stops across the United States. *Nat Hum Behav* 4, 736 (2020). Available at <https://www.nature.com/articles/s41562-020-0858-1>

<sup>2</sup> <https://www.bjs.gov/index.cfm?tid=702&ty=tp>

those stakeholders. Each of these jurisdiction’s changes or proposed changes are very new, so in many instances staffing and budget information has not been created or accurate data is unavailable. Because many of these changes are in their infancy or have yet to be implemented, they face amendments or revisions, significant legal challenges, or logistical and implementation issues. For example, the most recent change in policy in Los Angeles was just approved in March 2022, while Philadelphia’s Driving Equality Bill was met with a lawsuit challenging it on preemption grounds.

Finally, because this consulting project occurred under a compressed timeframe, additional outreach and information could be useful to 1) provide a more comprehensive overview of the different jurisdictions if needed and 2) track the changes and issues these jurisdictions face given the dynamic and iterative nature of them.

## II. TRAFFIC STOPS

### A. RACIAL DISPARITIES

The U.S. Supreme Court’s Fourth Amendment jurisprudence allows police to conduct pretextual vehicle stops based on minor traffic violations.<sup>3</sup> In Washington, mixed-motive traffic stops are permissible under article I, section 7 of Washington State’s Constitution “[s]o long as the desire to address a suspected traffic infraction (or criminal activity) for which the officer has a reasonable articulable suspicion is an actual, conscious, and independent cause of the traffic stop.”<sup>4</sup> But the use of pretext vehicle stops has resulted in disparate impacts on certain communities. One major study found that “police stops and search decisions suffer from persistent racial bias and point to the value of policy interventions to mitigate these disparities.”<sup>5</sup> The Stanford Open Policing Project — a unique partnership between the Stanford Computational Journalism Lab and the Stanford Computational Policy Lab — has data available from 2015 forward available and aggregated by city and state that reflects significant disparities.<sup>6</sup>

In Berkeley, California, a study by the Center for Policing Equity found Black persons were about 6.5 times more likely per capita than White persons to be stopped while driving.<sup>7</sup> Hispanic persons were about twice as likely, per capita, as White persons to be stopped.<sup>8</sup> Despite these disparities, searches of Black individuals yielded arrests only half as often as searches of White individuals.<sup>9</sup>

<sup>3</sup> *Whren vs. United States*, 517 U.S. 806 (1996).

<sup>4</sup> *State v. Arreola*, 176 Wash.2d 284, 288 (2012).

<sup>5</sup> See note 1 at 736-745 (2020).

<sup>6</sup> See <https://openpolicing.stanford.edu/findings/>

<sup>7</sup> [https://www.cityofberkeley.info/uploadedFiles/Police\\_Review\\_Commission/Commissions/2018/Berkeley%20Report%20-%20May%202018.pdf](https://www.cityofberkeley.info/uploadedFiles/Police_Review_Commission/Commissions/2018/Berkeley%20Report%20-%20May%202018.pdf) at pp. 7-8.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

Similarly, searches of Hispanic individuals yielded arrests 39% less often than searches of White individuals.<sup>10</sup>

In Los Angeles, the Los Angeles Police Department’s Inspector General issued a report following a study of traffic stops in 2019. That report noted, “The majority of the officer-initiated stops were made based on one or more traffic violations. This category made up about 81 percent of stop incidents and 77 percent of people stopped.”<sup>11</sup>

The OIG found much of the overall disparity in stop frequency was driven by high rates of stops in areas that had both high levels of violent crime and comparatively high proportions of Black residents.<sup>12</sup> However, even in these areas, Black residents were overrepresented in the frequency of stops, including stops for traffic violations and other minor crimes.<sup>13</sup> This impacted the reason for the stop as well:

While there were racial disproportions in stops for every type of violation, traffic stops of White and some other groups were most likely to be based on driving (moving) violations, while traffic stops of Black and Hispanic people were most likely to be based on equipment or regulatory violations (such as an expired vehicle registration).<sup>14</sup>

These disparities have played an important part in these jurisdictions in changing approaches to traffic stops.

**B. EFFICACY**

Some studies have raised questions regarding the efficacy of traffic stops on arrest rates and crime. With respect to arrest rates, a study in San Diego examining data from 2014 and 2015 found similar disparities in Los Angeles and found an overall arrest rate for traffic stops for every racial group below 2%.<sup>15</sup> A study on the Fayetteville Police Department’s decision to deprioritize “investigatory stops” and focus on “safety stops” found reduced traffic and injury outcomes, as well as a reduction in the racial disparity occurring in traffic stops.<sup>16</sup>

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<sup>10</sup> *Id.*  
<sup>11</sup> [https://www.oig.lacity.org/files/ugd/b2dd23\\_d3e88738022547acb55f3ad9dd7a1dcb.pdf](https://www.oig.lacity.org/files/ugd/b2dd23_d3e88738022547acb55f3ad9dd7a1dcb.pdf)  
<sup>12</sup> *Id.*  
<sup>13</sup> *Id.*  
<sup>14</sup> *Id.*  
<sup>15</sup> <https://www.sandiego.gov/sites/default/files/sdpdvehiclestopsfinal.pdf>  
<sup>16</sup> <https://injepijournal.biomedcentral.com/articles/10.1186/s40621-019-0227-6#Abs1>

Finally, a study conducted by New York University School of Law’s Policing Project<sup>17</sup> in collaboration with the Stanford Computational Policy Lab analyzed racial disparities in stops in Nashville and the efficacy of the City’s stop policy.<sup>18</sup> The disparities were vast, as Black drivers in Nashville were 68% more likely to be stopped for a non-moving violation than White drivers.<sup>19</sup> But the Policing Project notes:

“[N]on-moving violation stops do not appear to have a discernible effect on either long-term or short-term crime rates. And they result in a relatively small number of arrests. This suggests that if MNPD’s primary concern is crime reduction, it could reduce the number of equipment and registration stops, and direct officer resources to more productive strategies that could potentially lead to greater reductions in crime, while strengthening the relationship between MNPD and the communities it serves.”<sup>20</sup>

As these studies reflect, there is at least some empirical basis to support the changes outlined below. Of course, other groups and entities believe strongly that pretext traffic stops can be an important tool for public safety, including in jurisdictions where changes are being made.<sup>21</sup>

### C. FOCUSES ON EQUITY

Given this and other data, some jurisdictions have proposed changes through a specific equity lens. For example, Brooklyn Center, Minnesota, passed Resolution 2021-73, The Daunte Wright and Kobe Dimock-Heisler Community Safety and Violence Prevention Act. This legislation mandates a new citation policy and creation of a civilian traffic enforcement agency, among other changes, to “better address the root causes of many systemic issues, promote racial justice, better protect vulnerable members of our community, and more efficiently allocate public resources while recognizing there is still work to be done to address policing mindset and culture...”<sup>22</sup>

The Pittsburgh Ordinance 2021-2174, which narrowed the scope of traffic violations subject to a lawful stop, notes its clear equity intent:

It is the purpose of this legislation to further the just, equitable, and fair enforcement of the law for all people, to provide for the fair and transparent administration of the

<sup>17</sup> The Policing Project also published a “model” bill to prevent pretext traffic stops.  
<https://static1.squarespace.com/static/58a33e881b631bc60d4f8b31/t/6204237c88693e47cf9786bb/1644438396941/Pretext+Traffic+Stop+act+1.31.22.pdf>  
<sup>18</sup> <https://static1.squarespace.com/static/58a33e881b631bc60d4f8b31/t/5bf2d18d562fa747a554f6b0/1542640014294/Policing+Project+Nashville+Report.pdf>  
<sup>19</sup> *Id.*  
<sup>20</sup> *Id.*  
<sup>21</sup> See, e.g., Chen interview.  
<sup>22</sup> <https://www.ci.brooklyn-center.mn.us/home/showpublisheddocument/1665/637683298143730000>

code with respect to all, to prevent racial disparities, and to protect public safety in a manner consistent with these values.<sup>23</sup>

Police departments are addressing equity concerns by looking into changes in traffic stop enforcement. In Los Angeles, proposed policy changes to Department Manual Section 1/240.06 (Policy – Limitation on Use of Pretextual Stops) notes:

Members of our community and communities around the country have expressed concern regarding the manner and frequency with which officers are stopping individuals for perceived minor violations to investigate other crimes...the Department seeks to eliminate bias in any form from within its ranks and practices.<sup>24</sup>

These types of statements are consistently found in the public record from the jurisdictions included in this report.

### III. JURISDICTIONS

#### A. CHANGES IN LAWS

The first major piece examines cities and states that have passed or are considering passing legislation that narrow the violations that can result in a lawful traffic stop.

##### 1. PHILADELPHIA AND PITTSBURGH

Philadelphia and Pittsburgh recently passed ordinances prohibiting traffic stops for “Secondary” violations, which include traffic violations such as a single burned out brake light or the improper display of a vehicle registration tag.<sup>25</sup> Philadelphia’s ordinance entitled the Driving Equality Bill states:

[A] police officer or other law enforcement officer may initiate a motor vehicle stop for a secondary violation observed within the City of Philadelphia only where there is a simultaneously-observed primary violation for which an officer, at their discretion, could issue a citation.<sup>26</sup>

<sup>23</sup> <https://pittsburgh.legistar.com/LegislationDetail.aspx?ID=5208670&GUID=B5AEC7AF-6845-4012-8B7D-3462C66597FA&Options=ID%7CText%7CAttachments%7COther%7C&Search=2174&FullText=1>

<sup>24</sup> [http://www.lapdpolicecom.lacity.org/030122/BPC\\_22-042.pdf](http://www.lapdpolicecom.lacity.org/030122/BPC_22-042.pdf)

<sup>25</sup> The bill sponsors in both Philadelphia and Pittsburgh did not respond to outreach messages.

<sup>26</sup> <https://phila.legistar.com/LegislationDetail.aspx?ID=5007830&GUID=065348E0-F4F6-4B6A-A088-DFEF5358E73CD&Options=ID|Text|&Search=210636> (see link to Certified Copy).

Examples of secondary violations under these ordinances include expired registration tags when within a 60-day window, placement of temporary registration permits, single brake lights or head lights, and other violations related to bumpers and proof of emission inspections.<sup>27</sup>

Philadelphia’s ordinance takes effect this month while Pittsburgh’s law takes effect at the end of April 2022.<sup>28</sup> On February 23, 2022, the Philadelphia Fraternal Order of Police, the local union, filed a lawsuit challenging the Driving Equality Bill. Based on media reports, the FOP is seeking declaratory relief and raising, among other arguments, preemption issues.<sup>29</sup>

**2. VIRGINIA**

In addition to cities, some states either are enacting or considering enacting changes. Virginia amended state law to prohibit police stops for certain types of encounters, such as for operating (i) without a light illuminating a license plate, (ii) with defective and unsafe equipment, (iii) without brake lights or a high mount stop light, (iv) without an exhaust system that prevents excessive or unusual levels of noise, (v) with certain sun-shading materials and tinting films, and (vi) with certain objects suspended in the vehicle.<sup>30</sup>

Virginia’s legislative change also specifically excludes evidence obtained from now-illegal traffic stops in criminal prosecutions: “No evidence discovered or obtained as a result of such unlawful stop shall be admissible in any trial, hearing, or other proceeding.”<sup>31</sup> By making this explicit within the statute, Virginia has likely removed such stops from the ambit of the Supreme Court’s exceptions to the Fourth Amendment’s exclusionary rule.<sup>32</sup>

Finally, the Virginia statute specifically preempts cities from enacting a local ordinance that reverses any of these changes.<sup>33</sup>

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<sup>27</sup> *Id.* at note 19, 21.

<sup>28</sup> *Id.*

<sup>29</sup> <https://philadelphia.cbslocal.com/2022/02/23/philadelphia-fop-lawsuit-pull-over-drivers-for-low-level-offenses/>

<sup>30</sup> *See e.g.* Section 46.2-646. Expiration and renewal of registration (“No law-enforcement officer shall stop a motor vehicle due to an expired registration sticker prior to the first day of the fourth month after the original expiration date.”) (available at <https://legiscan.com/VA/text/SB5029/2020/X1>).

<sup>31</sup> *Id.*

<sup>32</sup> *See e.g.* *Utah v. Strieff*, 136 S. Ct. 2056 (finding preexisting arrest warrant attenuated illegal stop).

<sup>33</sup> *See* note 25.

**3. CONNECTICUT**

Connecticut, as part of a larger police reform bill, passed House Bill No. 6004 that changes how officers may conduct traffic stops.<sup>34</sup> This part of the bill, which became effective October 1, 2020, has two major components:

- (1) it prohibits unsolicited consent searches where the car was stopped for a motor vehicle violations,<sup>35</sup> and
- (2) it prohibits an officer from asking a driver to “provide any documentation or identification other than an operator's license, motor vehicle registration, insurance identity card or other documentation or identification directly related to the stop, when the motor vehicle has been stopped solely for a motor vehicle violation, unless there exists probable cause to believe that a felony or misdemeanor offense has been committed or the operator has failed to produce a valid operator’s license.”<sup>36</sup>

Connecticut’s bill is narrower than Virginia’s proposed bill. It does not prohibit stops for minor offenses but focuses on when consent can be granted following such a stop and what types of information an officer can request when a driver is stopped solely for a traffic violation.

**4. WASHINGTON**

Washington’s proposed bill, SB 5485, prohibits stops for certain traffic violations, including: failure to keep to the right, improper turns, failure to stop, parking violations, driving without a license, vehicle registration violations, suspended licenses, and safety belt violations.<sup>37</sup> The bill is still in its early stages. A public hearing in the Senate Committee on Transportation occurred on February 3, 2022.<sup>38</sup>

**B. CHANGES IN POLICE POLICY**

Many jurisdictions have proposed or passed new policies eliminating pretext traffic stops.

**1. LOS ANGELES**

As noted above, the Los Angeles Inspector General’s Office found significant racial disparities in traffic stops based on 2019 stop data. On January 26, 2022, the Los Angeles Police Department

<sup>34</sup> <https://www.cga.ct.gov/2020/ACT/PA/PDF/2020PA-00001-R00HB-06004SS1-PA.PDF>

<sup>35</sup> *Id.* at subsection 21(a)(1)

<sup>36</sup> *Id.* at subsection 21(b)

<sup>37</sup> <https://lawfilesexternal.wa.gov/biennium/2021-22/Pdf/Bills/Senate%20Bills/5485.pdf?q=20220303160412>

<sup>38</sup> <https://app.leg.wa.gov/billsummary?BillNumber=5485&Year=2021&Initiative=False#documentSection>

proposed a change in policy that limits traffic stops when there is a specific public safety issue involved and prohibits pretext stops unless the officer has “articulable information” regarding a crime involving a potential for great bodily injury or death. The final version of this policy was approved on March 1, 2022.<sup>39</sup>

The key parts of the revised policy states:

Traffic or pedestrian stops made for the sole purpose of enforcing the Vehicle Code or other cords are intended to **protect public safety**. Therefore, officers should make stops for minor equipment violations or other infractions only when the officer believes that such a violation or infraction significantly interferes with public safety.

Note: The public safety reason for all traffic/pedestrian stops, citations and warnings should be articulated on body-worn video (BWV) and should include an officer’s response to any questions posed by the individual stopped.

It is the Department’s policy that pretextual stops shall not be conducted **unless** officers are acting upon articulable information in addition to the traffic violation, which may or may not amount to reasonable suspicion, regarding a serious crime (i.e. a crime with potential for great bodily injury or death...) *Id. (emphasis in original)*

The LA policy also imposes discipline on officers who fail to abide by the policy.<sup>40</sup>

**2. BROOKLYN CENTER**

Brooklyn Center required a new citation and summons policy and barred consent searches for traffic and misdemeanor violations as part of Resolution 2021-73. The Resolution “directs the City Manager to implement forthwith a citywide ‘citation and summons’ policy requiring officers to issue citations only, and prohibiting custodial arrests and consent searches of persons or vehicles, for any non-moving traffic infraction, non-felony offense, or non-felony warrant, unless otherwise required by law...”<sup>41</sup>

Resolution 2021-73(3) also requires the City to examine “appropriate changes in ordinance, practices or policies, including restricting or eliminating the types of traffic offenses enforced by the City’s armed law enforcement patrol officers.”<sup>42</sup>

<sup>39</sup> [http://www.lapdpolicecom.lacity.org/030122/BPC\\_22-042.pdf](http://www.lapdpolicecom.lacity.org/030122/BPC_22-042.pdf)

<sup>40</sup> *Id.*

<sup>41</sup> <https://www.ci.brooklyn-center.mn.us/home/showpublisheddocument/1665/637683298143730000>

<sup>42</sup> *Id.*

The City Council-approved change in policy applies to misdemeanor arrests where the officer “must, in lieu of arrest...issue a citation or refer the matter for charging consideration, and allow the person to leave. Alternatively, in lieu of issuing a citation, an officer may refer the person to one or more public assistance or service programs recognized by the City that offer services appropriate to assist the person.”<sup>43</sup>

A number of exceptions to the citation policy exist relating to preventing harm and violence (e.g. criminal sexual misconduct or threatened use of a firearm) or where a warrant or other statute requires a custodial arrest.<sup>44</sup> According to Commander Garrett Flesland of the Brooklyn Center Police Department, the change in policy likely would impact no more than a handful of people each year.<sup>45</sup>

### 3. BERKELEY

In February 2021, the Berkeley City Council directed the Berkeley Police to implement a new evidence-based traffic enforcement model focusing on safety rather than low-level traffic offenses.<sup>46</sup> The Berkeley Police Department responded to the Council directive on October 19, 2021, stating,

Officers have been less directed to focus less attention to observations of equipment violations where no strong causal connection to collisions exist...BPID’s working group, along with the City of Berkeley Transportation Division Manager, have been working to identify what traffic offenses most impact public safety, and are therefore violations officers should focus their attention to.<sup>47</sup>

This process is ongoing.<sup>48</sup>

### 4. KING COUNTY

In contrast to the above jurisdiction, Kings County Sheriff policy indicates that deputies “should take appropriate enforcement action for each violation of traffic law violation witnessed or reported to them.”<sup>49</sup> The Manual contemplates stopping vehicles for things like equipment violations and non-hazardous violations,<sup>50</sup> indicating a more permissive approach to enforcing low-level traffic violations that other jurisdictions have or are considering narrowing.

<sup>43</sup> <https://www.ci.brooklyn-center.mn.us/home/showpublisheddocument/104/637788085610870000> at 281-82

<sup>44</sup> *Id.*

<sup>45</sup> Flesland interview

<sup>46</sup> <https://www.berkeleyside.org/wp-content/uploads/2021/02/Motion-Item-1-Fair-and-Impartial-Policing.pdf>

<sup>47</sup> [https://www.cityofberkeley.info/Clerk/City\\_Council/2021/10\\_Oct/Documents/2021-10-19\\_Item\\_01\\_BPD\\_Annual\\_Report\\_pdf.aspx](https://www.cityofberkeley.info/Clerk/City_Council/2021/10_Oct/Documents/2021-10-19_Item_01_BPD_Annual_Report_pdf.aspx) at pp. 18-19.

<sup>48</sup> Chen interview.

<sup>49</sup> KCSO General Orders Manual 4.09.005 (<https://public.powerdms.com/KCSO/tree/documents/1758006>).

<sup>50</sup> KCSO General Orders Manual 4.09.035.

As the above sampling indicates, jurisdictions of different sizes and geographic regions are making or considering substantive legal or policy changes to traffic enforcement. These changes curtail the Fourth Amendment’s permissiveness regarding pretext stops and consent search. And some jurisdictions, as in Virginia, add an explicit deterrent by making it part of their exclusionary rule.

**C. CIVILIAN TRAFFIC ENFORCEMENT**

At least three jurisdictions nationally have created or have taken public steps to create a civilian traffic enforcement agency: Berkeley, Brooklyn Center, and Cambridge. But stakeholders from these three jurisdictions all noted that each faced a direct legal barrier to implementing a civilian traffic enforcement agency because only sworn police officers can legally conduct traffic stops in Massachusetts, Minnesota, and California.

**1. CAMBRIDGE**

On October 14, 2020, the Cambridge Public Safety Committee passed a Policy Order to have the City Manager examine “transferring primary traffic enforcement responsibilities from CPD to unarmed, trained enforcement personnel in the Traffic & Parking Department, Department of Public Works, Health and Human Services, or another suitable department.”<sup>51</sup>

I interviewed sponsoring Councilmember Quinton Zondervan on February 8.<sup>52</sup> According to Councilmember Zondervan, a committee hearing regarding the proposal took place but the proposal did not advance further because the City Manager reported that, under Massachusetts law, only sworn officers can force a vehicle to pull over.<sup>53</sup> Moreover, according to Councilmember Zondervan, police in Cambridge have largely stopped traffic enforcement since the pandemic, so Cambridge has focused on other reform pieces such as mental health responses.<sup>54</sup>

**2. BROOKLYN CENTER**

In addition to the other changes mentioned above in Brooklyn Center, Resolution No. 2021-73 calls for the adoption of a civilian traffic enforcement agency. It states:

The City will create an unarmed civilian Traffic Enforcement Department to enforce all non-moving traffic violations in the City, including by creating the civilian Traffic Enforcement Department and by any other appropriate changes in ordinance, practices or polices, including restricting or eliminating the types of traffic

<sup>51</sup>[https://cambridgema.iqm2.com/Citizens/Detail\\_LegiFile.aspx?Frame=&MeetingID=2656&MediaPosition=&ID=12362&CssClass](https://cambridgema.iqm2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=2656&MediaPosition=&ID=12362&CssClass)

<sup>52</sup> Zondervan interview.

<sup>53</sup> *Id.*

<sup>54</sup> *Id.*

offenses enforce by the City’s armed law enforcement patrol officers.<sup>55</sup>

The Resolution mandates the creation of an Implementation Committee to “fully implement the will and intent of City Council as expressed in this Act.”<sup>56</sup>

Brooklyn Center hired David Zaffrann, who started in his position on January 10, 2022. I interviewed Mr. Zaffrann on February 22, 2022.<sup>57</sup> He reported that they were in the very early stages of the project and that for the next three months, he will be forming the Committee and gathering data to move forward.<sup>58</sup> At this early stage, no costing or staffing analysis has occurred.<sup>59</sup>

Mr. Zaffrann noted that with respect to the civilian traffic agency, Minnesota law does not permit a non-police officer to conduct a traffic stop, so policy changes will likely be the path moving forward.<sup>60</sup> Brooklyn Center Police Commander Flesland also said Minnesota law prohibited this piece of the Act.<sup>61</sup>

On December 6, 2021, Brooklyn Center approved approximately \$1 million to fund some of the initiatives approved in the resolution.<sup>62</sup> According to local media, Andy Splinter, Brooklyn Center’s acting finance director, reported the funding breakdown down as follows:

Community response unit (911 mental health calls) – \$517,957

Civilian traffic enforcement – \$260,000

Community transformational change (youth and community programming) – \$238,000

Implementation committee – \$150,000<sup>63</sup>

Part of the funding for the above is from freezing 3 vacant police positions.<sup>64</sup> The budget transmitted by the City Manager is attached to this report.<sup>65</sup>

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<sup>55</sup> <https://www.ci.brooklyn-center.mn.us/home/showpublisheddocument/1665/637683298143730000>

<sup>56</sup> *Id.*

<sup>57</sup> Zaffrann interview.

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

<sup>61</sup> Flesland interview.

<sup>62</sup> <https://ccxmedia.org/news/brooklyn-center-approves-1m-for-public-safety-reform/>.

<sup>63</sup> *Id.*

<sup>64</sup> *Id.*

<sup>65</sup> <https://brooklyncenter.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=3888&MeetingID=443>

(see attached transmittal letter)

### 3. BERKELEY

The City of Berkeley is at the forefront of attempting to create a civilian traffic enforcement agency. On July 14, 2020, Councilmember Rigel Robinson recommended that the City “pursue the creation of a Berkeley Department of Transportation (BerkDOT) to ensure a racial justice lens in traffic enforcement and the development of transportation policy, programs, and infrastructure.”<sup>66</sup> Under this proposal, Berkeley “could shift traffic enforcement, parking enforcement, crossing guards, and collision response & reporting away from police officers—reducing the need for police interaction with civilians—and ensure a racial justice lens in the way we approach transportation policies, programs, and infrastructure.”<sup>67</sup> Currently, the traffic and parking divisions are within the police department.<sup>68</sup>

According to Liam Garland, Berkeley’s Director of Public Works, BerkDOT would consolidate six police functions currently executed by Berkeley Police Department: an unarmed traffic unit, crossing guards, parking enforcement, paving, collision investigation and traffic control.<sup>69</sup> According to a local media source citing Garland, BerkDOT would provide around 100 positions and cost \$50 million. During an interview, Garland said that fiscal numbers would likely be discussed before the Council in March but that specific figures at this point were not publicly available.<sup>70</sup> Garland also noted that public opinion support the proposed changes, according to a survey of city residents<sup>71</sup>:



Berkeley is facing significant challenges. First, just as in Minnesota and Massachusetts, California mandates that only sworn police officers conduct traffic stops. In response to that legal constraint,

<sup>66</sup> [https://www.cityofberkeley.info/Clerk/City\\_Council/2020/07\\_Jul/Documents/2020-07-14\\_Item\\_18e\\_BerkDOT\\_Reimagining\\_Transportation\\_pdf.aspx](https://www.cityofberkeley.info/Clerk/City_Council/2020/07_Jul/Documents/2020-07-14_Item_18e_BerkDOT_Reimagining_Transportation_pdf.aspx)

<sup>67</sup> *Id.*

<sup>68</sup> [https://www.cityofberkeley.info/Police/Home\\_-\\_translated/Traffic\\_Bureau.aspx](https://www.cityofberkeley.info/Police/Home_-_translated/Traffic_Bureau.aspx).

<sup>69</sup> Garland interview. See also Public Works Report in SharePoint folder.

<sup>70</sup> *Id.*

<sup>71</sup> See “Berkeley-Survey” in SharePoint folder

Berkeley is lobbying to change the law to remove that constraint. However, there has been little momentum gathered so far.<sup>72</sup>

Because of that legal constraint, the civilian traffic unit has been largely tabled until 2023.<sup>73</sup> Mr. Garland noted it is more efficient to focus on the pieces that can be completed moving forward, such as transferring parking enforcement to avoid negative police encounters,<sup>74</sup> rather than spending resources that might never be enabled. As Mr. Garland and Angie Chen from Councilmember Robinson’s office said, there is no unarmed traffic enforcement in the country but there is parking enforcement precedent.<sup>75</sup>

Second, if state law changes, any shifts away from BPD will trigger collective bargaining issues.<sup>76</sup> BPD has not yet weighed in fully because of the legal barriers. *Id.* However, as for the parking enforcement shift to public works, the parking enforcement union has reacted negatively to the proposed shift but no specific negotiations or meet and confers have taken place. *Id.* The union is concerned with safety, as the parking officers were moved to BPD because of assaults against them.<sup>77</sup> The parking officers also reportedly feel more comfortable under the police department because they believe their duties align more with the police than with transportation and public works.<sup>78</sup>

Finally, it should be noted that Berkeley’s long-term vision does not end with BerkDOT.<sup>79</sup> Berkeley, like many other cities, is focused on Vision Zero<sup>80</sup> in viewing traffic enforcement as a larger transportation safety issue rather than a law enforcement or traditional public safety one.<sup>81</sup>

#### 4. LEGAL CONSTRAINTS

As noted above, California, Massachusetts, and Minnesota (where these projects are being analyzed) all reportedly have legal barriers to having non-police officers conduct traffic stops.

Washington State’s Revised Code (RCW) clearly contemplates law enforcement officers to engage in traffic stops.<sup>82</sup> For example, RCW section 46.04.4141 says, “Police officer means every officer

<sup>72</sup> Chen interview.

<sup>73</sup> Garland interview.

<sup>74</sup> See, e.g., <https://www.oaklandca.gov/topics/oakdot-racial-equity-team> (noting Traffic Enforcement component of OakDOT racial equity lens).

<sup>75</sup> Garland and Chen interviews.

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

<sup>78</sup> *Id.*

<sup>79</sup> Ghosh and Lipson interviews.

<sup>80</sup> <https://www.governing.com/archive/gov-pedestrian-deaths-vision-zero-sweden.html>

<sup>81</sup> Ghosh and Lipson interviews.

<sup>82</sup> See e.g., RCW <https://app.leg.wa.gov/RCW/default.aspx?cite=46.04.4141>; RCW 10.93.020 (“defining General authority Washington law enforcement agency” to include any agency “having as its primary function the detection and apprehension of persons committing infractions or violating the traffic or criminal laws...”); RCW 10.31.100(7) (“An officer may act upon the request of a law enforcement officer, in whose presence a traffic infraction was committed, to stop, detain, arrest, or issue a notice of traffic infraction to the driver who is believed to have

authorized to direct or regulate traffic or to make arrests for violations of traffic regulations.” In addition to the definition of police officers, Washington’s RCW is centered on police enforcement, having specific statutes for failing to yield to a police officer, a duty to stop, and having the ability to conduct a Fourth Amendment seizure.<sup>83</sup>

RCW Section 46.64.010 uses terms such as “traffic enforcement agency” and “traffic enforcement officer” regarding traffic citations, but those terms are not defined elsewhere in the RCW. A subsequent Westlaw search for those terms did not result in useful information.

Finally, RCW 46.08.020 specifically preempts cities and towns from enacting “any law, ordinance, rule or regulation in conflict with the provisions of this title except and unless expressly authorized by law...Local authorities may, however, adopts additional vehicle and traffic regulations which are not in conflict with...this title.” Accordingly, any local changes may raise preemption issues along with practical jurisdiction enforcement issues. As noted above, Virginia included a clear statement preempting any city or county in the state from passing legislation conflicting with the law.

#### D. AUTOMATION

Another significant area that jurisdictions are considering making changes is automated traffic enforcement. The most common are red light and speed tracking camera enforcement.

In a 2017 study, the National Transportation Safety Board recommended the use of automated speed enforcement, identifying it as “an effective countermeasure to reduce speeding-related crashes, fatalities, and injuries.”<sup>84</sup> The NTSB recommended that all states use automated speed enforcement and that states that ban or do not use should still implement it for safety reasons.<sup>85</sup> The Center for Disease Control and Prevention (CDC) also has information as to which states and localities use automated enforcement and research on effectiveness.<sup>86</sup>

Washington state allows automated traffic safety cameras under certain conditions<sup>87</sup>, while California and Minnesota ban the use of such devices. Last year, Berkeley passed a resolution in support of AB 550, a proposed bill in California that would authorize certain cities to use “speed

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the infraction. The request by the witnessing officer shall given an officer the authority to take appropriate action under the laws of the state of Washington.”)

<sup>83</sup> See, e.g., RCW 46.61.020 and .022 (making it a crime to refuse to cooperate “when signaled to stop by any police officer” or failing to stop when requested to do so by “a person reasonably identifiable as a law enforcement officer”); RCW 46.61.021 (“Any person requested or signaled to stop by a law enforcement officer for a traffic infraction has a duty to stop”, noting a person stopped for a traffic infraction “may detain that person for a reasonable period of time” to identify the person, check for outstanding warrants, check documents, and issue the notice of traffic violation.)

<sup>84</sup> <https://www.nts.gov/safety/safety-studies/Documents/SS1701.pdf> at p. 55.

<sup>85</sup> *Id.* at 57.

<sup>86</sup> <https://www.cdc.gov/motorvehiclesafety/calculator/factsheet/speed.html>

<sup>87</sup> See RCW section 46.63.170, available at <https://app.leg.wa.gov/rcw/default.aspx?cite=46.63.170>

safety systems,” meaning, generally, automated systems such as camera-like devices to detect speeding violations. The bill died on January 31.<sup>88</sup>

In jurisdictions that use or have used automated traffic enforcement, there are concerns about disparate impacts and excessive fines. For example, a ProPublica analysis of automated enforcement in Chicago found:

[H]ouseholds in majority Black and Hispanic ZIP codes received tickets at around twice the rate of those in white areas between 2015 and 2019. The consequences have been especially punishing in Black neighborhoods, which have been hit with more than half a billion dollars in penalties over the last 15 years, contributing to thousands of vehicle impoundments, driver’s license suspensions and bankruptcies.<sup>89</sup>

In Rochester, New York, one of the jurisdictions noted in the ProPublica article above, decided to terminate its red-light camera program because of the impacts on poor communities. At that time, former Rochester Mayor Lovely Warren said, “I am ending this program because the safety benefit does not justify the disproportionate financial burden it places upon people who are struggling to make ends meet. This seems counterproductive to our efforts to reverse Rochester’s troubling rates of poverty.”<sup>90</sup> The city ultimately disagreed with the consultant it hired to study the impacts of the city’s camera program. The consultant’s report said, “Based upon the results of this study, the red-light camera program has reduced the overall crash rate, the severity of crashes, and related crash costs. Therefore, it is our recommendation that the City continue the red light camera program.”<sup>91</sup>

Miami also ended its red-light camera program in 2017 amid complaints from low-income residents who felt unfairly burdened by the fines.<sup>92</sup>

Some jurisdictions are examining different ways to reinstitute automated enforcement programs, while addressing some the equity concerns. For example, California’s AB 550 included provisions to limit the financial burden imposed by violations triggered from the speed safety systems. For example, the bill required a city to reduce fines and penalties for indigent persons and to offer such persons community service in place of penalty and installments plans, with monthly payments of no more than \$25.<sup>93</sup> In addition, the bill prohibited the Department of Motor Vehicles (DMV) from suspending or revoking the violator’s driving privilege and from assigning points against the violator’s driving record.<sup>94</sup>

<sup>88</sup>[https://leginfo.ca.gov/faces/billStatusClient.xhtml?bill\\_id=202120220AB550](https://leginfo.ca.gov/faces/billStatusClient.xhtml?bill_id=202120220AB550)

<sup>89</sup><https://www.propublica.org/article/chicagos-race-neutral-traffic-cameras-ticket-black-and-latino-drivers-the-most>

<sup>90</sup><https://www.cityofrochester.gov/article.aspx?id=8589970629>

<sup>91</sup><https://www.democratandchronicle.com/story/news/2016/05/24/rochester-red-light-camera-study/84848700/>

(Report at 24, embedded in link)

<sup>92</sup><https://miami.cbslocal.com/2017/12/14/miami-ends-red-light-cameras/>

<sup>93</sup>[https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB550](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB550).

<sup>94</sup> *Id.*

According to Berkeley Reimagining Task Force member Liza Lipson, Berkeley supported AB 550 because of its focus on safety while removing the concern over excessive fines and fees.<sup>95</sup> At the beginning of March 2022, California cities revived efforts to pass legislation on automated enforcement.<sup>96</sup>

Similarly, in Albuquerque, unlike the widely disliked red light camera program the city abandoned, a new proposed system would be mobile and target only speeding vehicles (although not low-level speeders going a few miles over the limit).<sup>97</sup> Violators would receive citations that are civil, rather than criminal, and they would be handled administratively.<sup>98</sup>

Automation also invokes privacy and data access issues. Berkeley has passed surveillance legislation banning facial recognition software<sup>99</sup>, but the issue continues to be one community members have expressed concern over.<sup>100</sup>

#### IV. CONCLUSION

As evident above, a number of cities and states across the country are reexamining how traffic stops have been historically conducted and are taking or considering taking new approaches. The above represents a sample of some emerging practices in certain cities and states rooted in policy changes, new legislation, and examining new structures to conduct traffic stops. This is a dynamic area addressing significant public safety, transportation, and public health issues, and one that will almost certainly continue to evolve moving forward.

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<sup>95</sup> Lipson interview.

<sup>96</sup> <https://www.sfchronicle.com/bayarea/article/Bay-Area-cities-want-to-use-cameras-to-enforce-16975885.php>

<sup>97</sup> <https://www.koat.com/article/albuquerque-mayor-signs-new-ordinance-implements-speed-enforcement-devices-to-crack-down-on-dangerous-driving/37977783>.

<sup>98</sup> [https://www.cabq.gov/clerk/documents/f\\_s-o-21-69.pdf](https://www.cabq.gov/clerk/documents/f_s-o-21-69.pdf)

<sup>99</sup> <https://berkeley.municipal.codes/BMC/2.99.020>

<sup>100</sup> Chen interview.

# Executive Response



## King County

### Office of Performance, Strategy and Budget

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Seattle, WA 98104

**206-263-9600** Fax 206-296-3462

TTY Relay: 711

[www.kingcounty.gov](http://www.kingcounty.gov)

June 7, 2022

KyMBER Waltmunson  
King County Auditor  
Room 1033  
COURTHOUSE

Dear Ms. Waltmunson:

Thank you for the opportunity to review and comment on the proposed final report "Traffic Enforcement: Strategies Needed to Achieve Safety Goals". I appreciate the work your office has done on this subject as we continually work to improve our public safety system and ensure that the King County Sheriff's Office (KCSO) is a premier law enforcement entity. I also appreciate the report's thoughtful acknowledgement of KCSO's involvement in the development and review of the audit and your willingness to modify the report to reflect our feedback.

We agree that a coordinated approach to traffic enforcement makes sense, concur with your recommendations, and believe they will result in better law enforcement practices. We will continue to review traffic-related data and will work to address any systematic issues that arise.

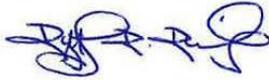
As you are aware, KCSO operates as both the primary law enforcement agency for unincorporated King County as well as the contract police agency for eleven local jurisdictions (e.g., Shoreline, Burien, Sammamish, etc). While KCSO maintains and updates policies for traffic enforcement across all areas of operation, specific jurisdictions place greater or lesser emphasis on traffic enforcement as they see fit.

With the confirmation of the newly appointed sheriff, KCSO is now reviewing and updating its mission and vision statement and agency values. Once complete, these will serve as an important tool for evaluating both existing and new policies, including KCSO agency wide work on traffic enforcement. However, KCSO will continue to work with each individual contract city or agency to ensure that contracted law enforcement activities are also carried out in alignment with local priorities.

In both this audit and the one focused on Calls for Service, the recommendations include the collection of perceived demographic data for traffic stops and service calls. As we discussed with your office, King County Code Title 2.15.010.G restricts any King County employee from collecting demographic information not necessary to provide services or required by federal or state law. While KCSO agrees that it is perceived race / ethnicity that is at the core of the biased and disproportional policing conversation, the King County Council will need to consider whether to alter King County Code to allow for collection of this information.

Thank you again for your important work on behalf of King County. If you have any questions regarding our audit response, please contact Dwight Dively, Chief Operating Officer and Director, Office of Performance, Strategy and Budget at 206-263-9687.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Dively", with a stylized flourish at the end.

Dwight Dively  
Chief Operating Officer

### Recommendation 1

The King County Sheriff's Office should identify traffic enforcement objectives and develop and implement strategies for meeting those objectives, using data to track progress toward its overarching safety goal.

Agency Response	
Concurrence	CONCUR
Implementation date	6/30/23
Responsible agency	KCSO
Comment	

### Recommendation 2

The King County Sheriff's Office should coordinate with unincorporated area commanders, contract partners, and the King County Department of Local Services to ensure that traffic safety objectives and strategies are in alignment with county goals.

Agency Response	
Concurrence	CONCUR
Implementation date	9/30/23
Responsible agency	KCSO, Contract Cities, DLS
Comment	

### Recommendation 3

The King County Sheriff's Office should collect perceived demographic data for each traffic stop, regardless of the purpose of the stop or its outcome. This recommendation is made in alignment with Recommendation 3 from our report "Sheriff's Office Data Shows Racial Disparities, Potential for Alternative Policing," which addresses analysis of this data.

Agency Response	
Concurrence	CONCUR
Implementation date	TBD
Responsible agency	KCSO, King County Council
Comment	Compliance with this issue will need Council action to modify existing code prohibiting the collection of demographic data.



# Statement of Compliance, Scope, Objective & Methodology

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## Statement of Compliance with Government Auditing Standards

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Scope of Work on Internal Controls

We assessed internal controls relative to the audit objectives. We assessed the extent that the King County Sheriff's Office has controls in place to manage traffic stops against law enforcement goals, primarily traffic safety. We reviewed best practices in linking police operations with traffic enforcement objectives, and assessed the Sheriff's Office practices against them. We also assessed the Sheriff's Office's data collection and analysis practices regarding traffic stops relative to expectations regarding non-biased policing.

## Scope

The audit examined traffic stops conducted by King County Sheriff's Office officers between 2018 and 2021.

## Objectives

- What are the number, type, circumstance, and outcomes of traffic stops across the county?
- What factors inform when and how Sheriff's Office officers conduct traffic stops?
- How are other jurisdictions adapting their traffic enforcement strategies and do those strategies align with Washington state law?

## Methodology

We obtained Sheriff's Office computer-aided dispatch system data from 2018 through 2021, reviewed and cleaned the data into a consolidated file, eliminated the 2018 data due to accuracy issues, and performed analysis on the remaining 2019–2021 data in Microsoft Excel to reach conclusions regarding specific traffic stop outcomes across Sheriff's Office contract partners and unincorporated King County. We compared those outcomes against one another to identify differences between these areas regarding traffic enforcement practices. We also performed analysis using data from the Sheriff's Office Mark43 and IAPro case management systems for comparisons regarding uses of force in traffic stops.

We reviewed King County documentation regarding policies, procedures, and operations related to Sheriff's Office traffic stops and traffic enforcement, including the Sheriff's Office General Orders Manual, the interlocal agreement contracts between the Sheriff's Office and its contract partners, Washington state reporting for King County Road Fund budget allocations supporting Sheriff's Office traffic stops, and other guidance. We also reviewed Washington state law regarding traffic stops, related data requirements, and categorization of traffic violations.

We reviewed academic studies and guidance from federal sources including the US Department of Justice and the US Department of Transportation regarding best practices in law enforcement operations planning for traffic enforcement, issues and concerns with bias in traffic stops, and academic conclusions regarding the effectiveness of different traffic enforcement interventions.

We interviewed commanders from Sheriff's Office unincorporated precincts, chiefs and traffic officers from Sheriff's Office contract partner police departments, city managers of Sheriff's Office contract partners, and senior Sheriff's Office leaders regarding traffic stops, traffic enforcement practices, dissemination of policy, and concerns specific to their service areas. We also interviewed staff from the Sheriff's Office Crime Analysis Unit and staff from the King County Department of Local Services Road Services Division regarding data collection and reporting.

We hired a consultant to research alternative traffic enforcement strategies that have been or are being pursued in jurisdictions across the United States and to gather information on those strategies, as well as associated legal barriers and constraints, both nationally and in Washington state.



# List of Recommendations

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## Recommendation 1

**The King County Sheriff's Office should identify traffic enforcement objectives and develop and implement strategies for meeting those objectives, using data to track progress toward its overarching safety goal.**

## Recommendation 2

**The King County Sheriff's Office should coordinate with unincorporated area commanders, contract partners, and the King County Department of Local Services Road Services Division to ensure that traffic safety objectives and strategies are in alignment with county goals.**

## Recommendation 3

**The King County Sheriff's Office should collect perceived demographic data for each traffic stop, regardless of the purpose of the stop or its outcome. This recommendation is made in alignment with Recommendation 3 from our report "Sheriff's Office Data Shows Racial Disparities, Potential to Expand Alternative Policing," which addresses analysis of this data.**



# Advancing Performance & Accountability

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## KING COUNTY AUDITOR'S OFFICE

KYMBER WALTMUNSON, KING COUNTY AUDITOR

**MISSION** Promote improved performance, accountability, and transparency in King County government through objective and independent audits and studies.

**VALUES** INDEPENDENCE • CREDIBILITY • IMPACT

**ABOUT US** The King County Auditor's Office was created by charter in 1969 as an independent agency within the legislative branch of County government. The office conducts oversight of county government through independent audits, capital projects oversight, and other studies. The results of this work are presented to the Metropolitan King County Council and are communicated to the King County Executive and the public. The King County Auditor's Office performs its work in accordance with Government Auditing Standards.



This audit product conforms to the GAGAS for independence, objectivity, and quality.