

From: [Eric Leland](#)
To: [-- City Clerk](#)
Subject: City Council Public Comment to Item #10 IPA Annual Report
Date: Sunday, March 17, 2024 7:19:47 PM

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Dear Mayor & Council Members,

Thank you for your support to establish a police auditor process, and thanks to city staff and our Police Auditor for the work to compile the Staff Report, Annual Report for 2023 and Work Plan for 2024. It is terrific to have a more transparent process for both understanding and improving the work of policing in Petaluma.

There are a few areas I found for improvement:

--> **Annual Report Related**

(1) Please amend the annual report to include information on the racial disparity in the Use of Force data. The chart on page 14 indicates that **36%** of the use of force is against Hispanic or Latino people, who make up only 19.3% of Petaluma's population according to the latest census. **14%** of the Use of Force is against Black people, who make up only 1.3% of Petaluma's population per the latest census. These are large disparities, and I would have expected the IPA to comment on this. We should focus on understanding and improving this disparity.

(2) Rules on Preserving Body-Worn Camera recordings. Page 25 of the IPA annual report cites IACP recommendations on Body-Worn Cameras, including that "officers may not delete, edit, or otherwise alter or destroy the recordings." Officers should be prevented via technological means (not simply by policy) from editing their own Body-Worn Camera video. Also, please provide a policy requiring the preserving the raw footage in every case, in the event that an investigation requires comparing the raw video to edited versions released to the public.

(3) Please publish the IPA 360-degree Assessment Rubric that page 4 of the IPA Annual Report indicates was shared with PPD last month along with the 2 hour training video.

(4) Release the Data for the public to review. This should include:

- Data describing the 61,753 calls for service, including the 4,803 police reports taken by officers, the 2,058 arrests, the 119 total incidents involving an application or show of force, 57 complaints, 32 vehicular pursuits, 2 internal affairs investigations.
- The body-worn camera footage for all critical incidents (particularly officer use of force incidents) should be posted publicly without requiring a public records request.
- The ethnic breakdown and as much detail about each data event as is possible to share.
- IPA specific findings and recommendations - tactics, response protocol, body-worn

- cameras compliance, handcuffing procedures, de-escalation, and stop/search procedures.
- A good model for a public searchable solution is the City of Oakland: <https://www.oaklandca.gov/topics/sb-1421-police-personnel-records>. Also we have Open Data Petaluma that at a bare minimum can house data sets.

-- > **Work Plan Related**

(5) The IPA workplan does not mention any focus on policies regarding hiring of police officers. The role of the IPA as stated in the Annual Report includes "Audits of Policies and Training." Hiring policy is key to safe and effective policing. Petaluma is currently evaluating applications for the Police Chief position, it would seem this would be a very valuable role for the IPA and critical at this particular moment.

(6) Establish a clear timeline to create the PSAG. Page 1 of the Work Plan indicates the PSAG will be established in the first quarter 2024, which would be in the next 3-4 weeks. However page 8 of the IPA Annual Report indicates only that meetings with the community would happen "in the upcoming months"

(7) Add to the Work Plan training on new CA laws effective January 1 2024, particularly those focusing on hate crimes. For instance, AB 2282 expands the definition of hate symbols to include any that intend "to terrorize another person" The bill also speaks to the need to address hate crimes with symbols against certain minority groups. Petaluma minority communities have been subject to repeated hate attacks, and hate attacks are historically high and rising fast.

(8) Add to the Work Plan reviewing Dispatch, Including the referral workflow to the SAFE Team. National research shared in prior public comment shows that incident severity is unnecessarily magnified at police dispatch, resulting in less safe encounters for both police and residents. Therefore dispatch is a crucial early system to review. For one specific related workflow issue, it remains difficult to impossible for callers to directly access the SAFE team on request - as of March 2024 police dispatch still requires callers to divulge information prior to reaching SAFE. This is despite numerous attempts by the former and current interim Chief of Police to remedy this situation.

(9) Improve the Online Multilingual/Accessible Complaint Submission. Currently, the IPA created complaint submission website uses machine translation technology, which is a poor substitute for human translation.

- The City of Petaluma should identify certain resources such as incident reporting as "vital" and requiring human translation due to the critical nature of the information.
- Submitting an online complaint to the IPA (<https://www.petalumapoliceauditor.org/contact-us>) uses black text input on dark blue text input boxes, which is nearly impossible to read and is a Level A (highest priority) accessibility violation per WCAG - see <https://www.w3.org/WAI/WCAG21/Understanding/use-of-color>. The indication that the "email" field is required is nearly invisible. There is also a confusing "lets chat" option in the bottom right that leads to the San Leandro IPA.

Thank you for your work to improve transparency and accountability in local policing.

- Eric

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