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Evaluation of the Berkeley
Police Department's Execution
of Fair and Unbiased Policing
Objectives

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Introduction

On February 23, 2021, the Berkeley City Council (City Council or Council) unanimously passed the package of policy recommendations that the Mayor's Working Group on Fair and Impartial Policing (FIP) forwarded to City Council after two years of meetings with experts and Berkeley Police Department (BPD) representatives (See Attachments 1 and 2). As part of that package, the Police Review Commission (PRC) and its successor the Police Accountability Board (PAB) were assigned responsibility for "monitoring and assessing" BPD implementation of the FIP directives. The directives included a requirement for quarterly updates from the BPD to City Council on implementation progress. A chart summarizing the BPD updates from June 2021 to October 2023 is provided in Attachment 3.

The goal of the Mayor's Fair and Impartial Working Group was to discuss ways to address racial disparities in BPD stops, arrests, and searches, as presented to the Berkeley community in the 2018 Center for Policing Equity (CPE) report¹ commissioned by the Council. That report found that, given the city's population demographics, Black motorists were 6.5 times more likely to be stopped by Berkeley police than White motorists and that Black pedestrians were 4.5 times more likely to be stopped than White pedestrians.

The PAB recognizes the ongoing efforts taken by the BPD to implement the FIP mandates, as represented in the quarterly updates from Chief Louis. This PAB report, submitted pursuant to the PAB's directive to monitor FIP implementation, is an independent assessment of progress to date. The focus of this assessment is not only on BPD changes in written policy, but also on whether progress has been made in reducing racial disparities in BPD stops, arrests, and searches.

This report begins with the most recent statistics on stops, arrests, and searches, which reveal a stubborn pattern of racial disparities over time. It then includes a discussion of the status of BPD's implementation efforts, as well as questions that emerge from Chief

¹ Center for Policing Equity. *The Science of Justice: Berkeley Police Department, National Justice Database City Report*. May 2018. www.policingequity.org.

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Louis's quarterly updates². The report concludes with recommendations for the BPD, the PAB, and the Council, with the goal of more effectively addressing racial disparities.

Fair and Impartial Policing Statistical Profile

BPD data that were derived from the BPD Transparency Hub and analyzed by the ODPa and the PAB reveal no significant progress in reducing racial disparities in stops since the CPE report was released in 2018. That report showed that for the period 2012-2016, Black motorists were 6.5 times more likely to be stopped than White motorists based on Berkeley demographics, and Black pedestrians in 2015-2016 were 4.5 more likely to be stopped than White pedestrians.

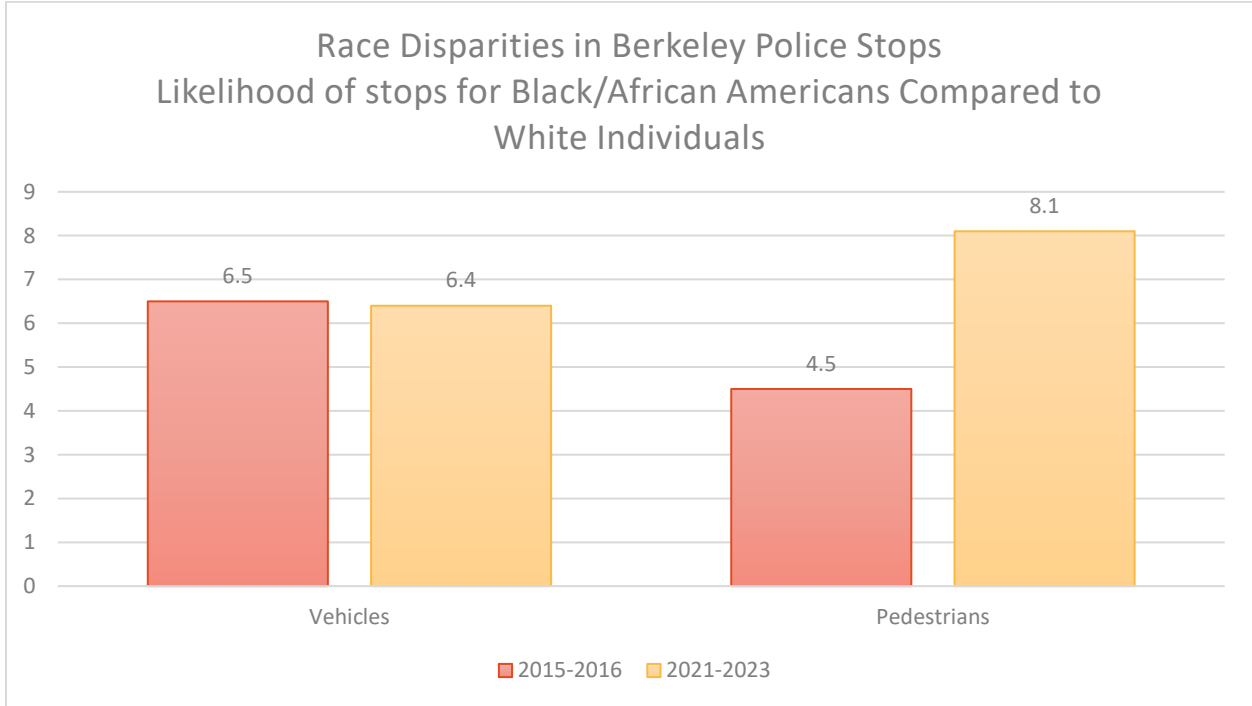
Current BPD statistics show that from April 1, 2021³ to October 2023, of the 17,760 stops of motorists and pedestrians, 34% were White individuals, 34% were Black individuals, and 16% were Latino/a individuals. Based on Berkeley population figures, Black motorists were 6.4 times more likely to be stopped by Berkeley police than White motorists. The racial disparity has worsened for pedestrian stops, with Black pedestrians now 8.1 times more likely to be stopped than White pedestrians.

Looking at overall stop data for Berkeley residents only, a significant racial disparity persists. Black people residing in Berkeley were 6.2 times as likely to be stopped as their White counterparts.

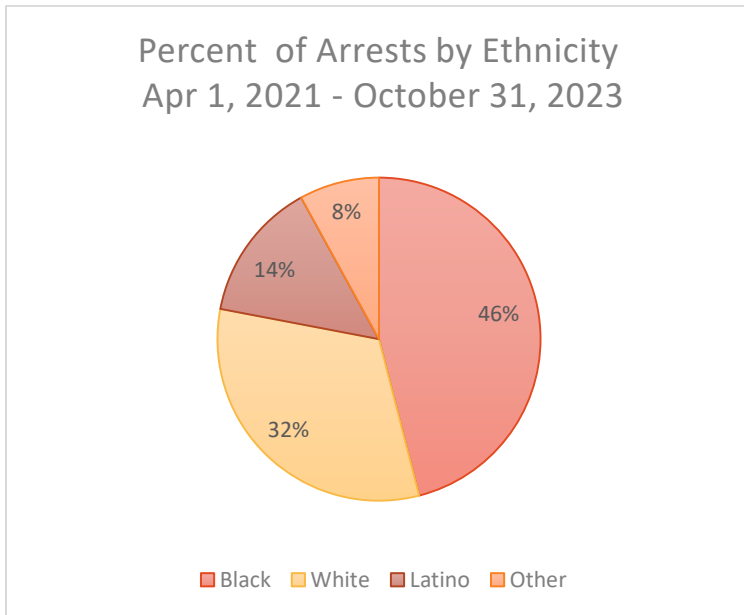
² In addition to direction to the Berkeley Police Department to implement reforms, the February 2021 City Council action included referral of some FIP recommendations to the public safety reimagining process, and others to be "taken up by the PAB". This report does not address recommendations that were referred to the reimagining process. The report substantively addresses one of the three recommendations referred to the PAB (annual implicit bias training).

³ The April 1, 2021 date was chosen in consideration of the fact that the FIP directives were issued by Council on February 23, 2021.

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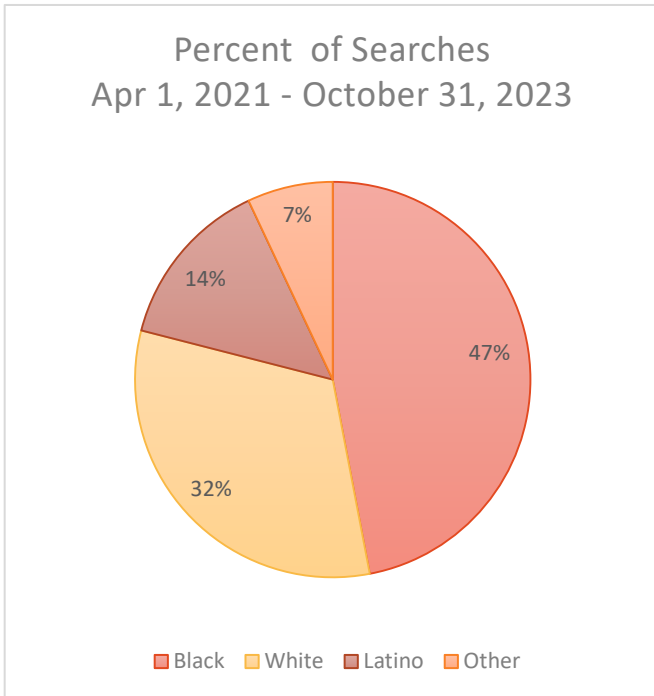


With respect to arrests, of 2,171 arrests in this period, Black people comprised 46 percent of the total, White people 32 percent, and Latinos 14 percent. This means that, based on population figures, Black people were 10.3 times as likely to be arrested as White people in Berkeley, and Latinos were twice as likely. Looking at these data a different way, Black people were 5.92 times more likely to be arrested than their population would suggest, White people were .57 times less likely, and Latinos 1.15 times more likely to arrested.



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Ethnicity	Number of Arrests
Black/African American	4429
Hispanic/Latino(a)	2167
White	4738
Other	2286
Grand Total	13620



Out of the 2,507 searches conducted by the BPD during the period of 2021-2023, Black individuals accounted for 47 percent, White individuals for 32 percent, and Latinos for 14 percent. This indicates that Black individuals were 10.4 times more likely to be arrested compared to White individuals, while Latino individuals were 1.9 times more likely. Alternatively, Black individuals were 5.96 times more likely to be searched than expected based on their population representation, White

individuals were 0.57 times less likely, and Latinos were 1.09 times more likely."

Policy and Practices Directive and Reforms

Reducing stops for low-level infractions and focusing on safety in traffic stops were the objectives. The FIP recommendation regarding traffic stops was to "prioritize safety in traffic stops" and "discontinue stops for minor offenses." The motion approved by the City Council was to "Implement a new evidence-based traffic enforcement model that emphasizes safety as the primary reason for traffic stops, rather than merely addressing minor offenses." Neither the Mayor's Working Group nor the Council provided a clear

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definition of “minor offenses.” The PAB recommends that the BPD adopt the definition utilized in SB50, as outlined in the footnote below.⁴

The BPD is using a 3-pronged approach to traffic safety (“Primary Collision Factors”; “Community Reports”; and “Community Caretaking”) to fulfill the Council directive (See Attachment 4 for BPD Special Order 1106.2). Quarterly BPD updates report that implementation of this recommendation is complete.

The first prong of BPD’s three-pronged approach, known as “Primary Collision Factors” or PCF, is generally excellent and data-driven at the local level. This prong comprises factors that commonly lead to fatal or severe collisions in Berkeley, including unsafe speed, disregarding pedestrian right-of-way at crosswalks, failure to yield for turns, red light violations, and stop sign violations.

One important update to this prong would be to specify not only the violation but also the mode of the party at fault (e.g., stop sign violations by drivers are a common cause of fatal and severe collisions in Berkeley, but stop sign violations by bicyclists are not, and the PCF categories should reflect this). It is expected that most, if not all, stops should occur in response to these well-documented safety issues, following the Council’s directive.

The second prong (“Community Reports”) consists of “responding to calls from community members” and includes such things as “possible DUI driver (i.e., car reportedly swerving)”; “driver fallen asleep at red light”; “a variety of unsafe driving incidents”; “crime with get-away vehicle description.” While some of these community calls no doubt require an immediate response, the category is broad and opens the door to potential profiling by proxy. At a minimum, under the category of “a variety of unsafe

⁴ In 2023, a Bill was introduced in the California Legislature, SB50 (“An Act to Amend Sections 21 and 21100 of, and add Section 2804.5, to the Vehicle Code”), that stipulated that “notwithstanding any other law, a peace officer shall not stop or detain the operator of a motor vehicle or bicycle for a low-level infraction...”. The Bill, which was tabled after a third reading and may be re-submitted this year, defined a “low-level infraction” as “a violation related to the registration of a vehicle or vehicle equipment,” as specified; “a violation related to the positioning or number of license plates when the rear license plate is clearly displayed...”; “a violation related to vehicle lighting equipment not illuminating, if the violation is limited to a single brake light, headlight, rear license plate, or running light or a single bulb in a larger light of the same,” as specified; “a violation related to vehicle bumper equipment,” as specified; “a violation related to bicycle equipment or operation,” as specified.

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driving incidents,” policies should be put in place that specify which calls for service will result in law enforcement action.

Data analyzed by the City Auditor’s data analysis⁵ shows that only 13% of calls from community members resulted in a citation or arrest, compared to 42% of officer-initiated stops. To maximize impact and effectively reduce the potential for profiling by proxy, analysis of this 13% should be conducted to determine what types of community calls are most likely to yield a law enforcement response crucial to public safety. The PAB recommends that this prong should then be substantially reformulated based on the data analysis of which types of calls for service result in enforcement actions and which are more likely to open the door to profiling by proxy.

The third prong, “Community Caretaking,” is the least specific and consists of three examples: “seatbelt violations”; “distracted driving (hands-free law)”; and “DUI”. As described by the BPD, these are not primary collision factors according to the California Highway Patrol because they are not the proximate cause of a collision (even if they may interact with primary collision factors and may be the ultimate cause of the collision). Because this prong is open-ended and consists only of several examples, it allows for maximum discretion with no real parameters.

The PAB recommends more specificity in this prong and that its components be based on Berkeley data rather than national statistics, as BPD did for Prong 1 (Primary Collision Factors, or PCFs). Specifically, the analysis should examine which other factors (non-PCFs) are highly associated with severe and fatal collisions in Berkeley. The open-ended quality of this prong may contribute to more non-safety related stops than is called for in the Council directive. If more specificity is not possible or feasible, this prong should be eliminated.

In addition to further clarification and specification of factors and policies related to prongs two and three, future BPD updates to Council should include statistical information enabling an analysis of the impact of the three-prong approach on reducing or eliminating

⁵ Data Analysis of the City of Berkeley’s Police Response, 07/02/2021
<https://berkeleyca.gov/sites/default/files/2022-01/Data-Analysis-Berkeley-Police-Response.pdf>

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stops for low-level offenses in a manner that supports an overall assessment, as well as an understanding of the impact of the approach on reducing racial disparities. The PAB analysis of vehicle stops reveals that no progress has been made on reducing racial disparities. Given this finding, careful scrutiny of the three-pronged approach needs to be undertaken, with future BPD updates analyzing disparity outcomes and focusing on their reduction, as appropriate.

Our analysis of BPD raw data on traffic stops⁶ reveals that the total number of traffic violation stops increased from 3,956 in 2020-2021 (at the height of the pandemic) to 6,280 in 2022-2023 when the three-pronged approach took effect. While the absolute number of stops increased significantly during this period, the number of stops for low-level infractions remained approximately the same—at 1,256 in 2022 and 1,219 in 2023. Because the number of stops overall increased dramatically, the percentage of stops for low-level infractions declined from 32% in 2020-2021 to 19% in 2022-2023. Most importantly, however, as we saw above, the overall aim of reducing racial disparities in stops has not been achieved.

Clear, evidence-based definition of stops of criminal suspects. The FIP Working Group recommended “us[ing] a clear, evidence-based definition for stops of criminal suspects.” This was not meant to be primarily about traffic stops but all stops of criminal suspects, including motorists, cyclists and pedestrians. Following this recommendation, Council directed the BPD to amend policies “reaffirming and clarifying that the Berkeley Police Department will use a clear, evidence-based definition for stops of criminal suspects.” The Department’s quarterly updates state that the BPD “is establishing a precision based policing model that considers data and public safety. This model aims to reduce the number of stops that studies have shown had minimal impact on public safety.” The PAB appreciates the BPD June 2023 and October 2023 update statement that “ensuring that we implement approaches that identify and work to reduce racial disparities will be a cornerstone to our evidence-based approaches.” However, without more specifics about the department’s “precision-based policing model” and “a feedback loop

⁶ The BPD data set on traffic violations included a few categories—such as those relating to improper parking, trespassing, and vehicle theft—which did not seem to us appropriate to include in these counts of traffic violations. We deleted those few categories, which accounted for 126 cases, from our calculations.

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with information flowing both ways”, it is difficult to assess whether these additions have the potential to reduce racial disparities. More specificity in this context is particularly critical as the data presented in this report indicate that racial disparities remain high. The BPD June and October 2023 updates also state that this “feedback loop ... creates an accountability measure.” Does this mean there is accountability for racial disparities? If so, what does it consist of? The next BPD update should include greater specificity regarding precision-based policing, feedback loops, and accountability measures. Further, and significantly, none of the BPD updates have included a definition of what constitutes legitimate stops for criminal suspects, evidence-based or otherwise. Although the BPD indicated that this recommendation was implemented as of September 2022, a definition is still outstanding.

Only use race and ethnicity as determining factors together with other clear criteria. BPD updates indicate that this recommendation has been completed because formal policies, state law, and the Constitution prohibit using race as the defining factor in making stops, arrests, and searches. The PAB is concerned that the BPD suggests that no change in this area is needed; the question is not whether BPD policies or state or federal law allow the use of race as a defining factor—clearly they do not. The question is how to prevent discretionary actions in the field from inadvertently introducing race as the determining factor. Most important, how are race and ethnicity used as determining factors “together with other clear criteria”? Future updates should include more specificity on this important question of how race and ethnicity may be used with other factors. Examples may be useful here.

Enhanced Implicit Bias Training. The FIP directives passed by Council “require enhanced annual implicit bias training for police.” The BPD updates state that there has been “ongoing training in topics such as implicit bias, racial profiling...”. The PAB has been informed by the BPD that “The topic of bias is covered as a subtopic throughout various trainings” such as de-escalation and tactical communication. This likely falls short of the enhanced annual implicit bias training focused that was called for in the Council directive. Full compliance with the Council directive requires that the BPD install annual intense implicit bias training, not the less intensive approach to implicit bias as a subtopic

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to other materials as currently practiced. Early Intervention System (EIS). An effective EIS was a central component of the FIP recommendations, and the focus—as with the FIP program as a whole-- was on racial disparities. As the Working Group stated in its presentation to Council in February 2021, an effective Early Intervention System would “involve identifying officer outliers in stops, searches, and use of force and their outcomes and examining the reasons for racial disparities.” Racial disparities take a back seat in the BPD quarterly updates, including in its description of an amended EIS program. Beyond this important omission, BPD updates have been inconsistent across quarterly reports with regard to how this directive has been implemented (See Attachment 3). After relative minor tweaking, the BPD reported that the EIS directive had been completed.

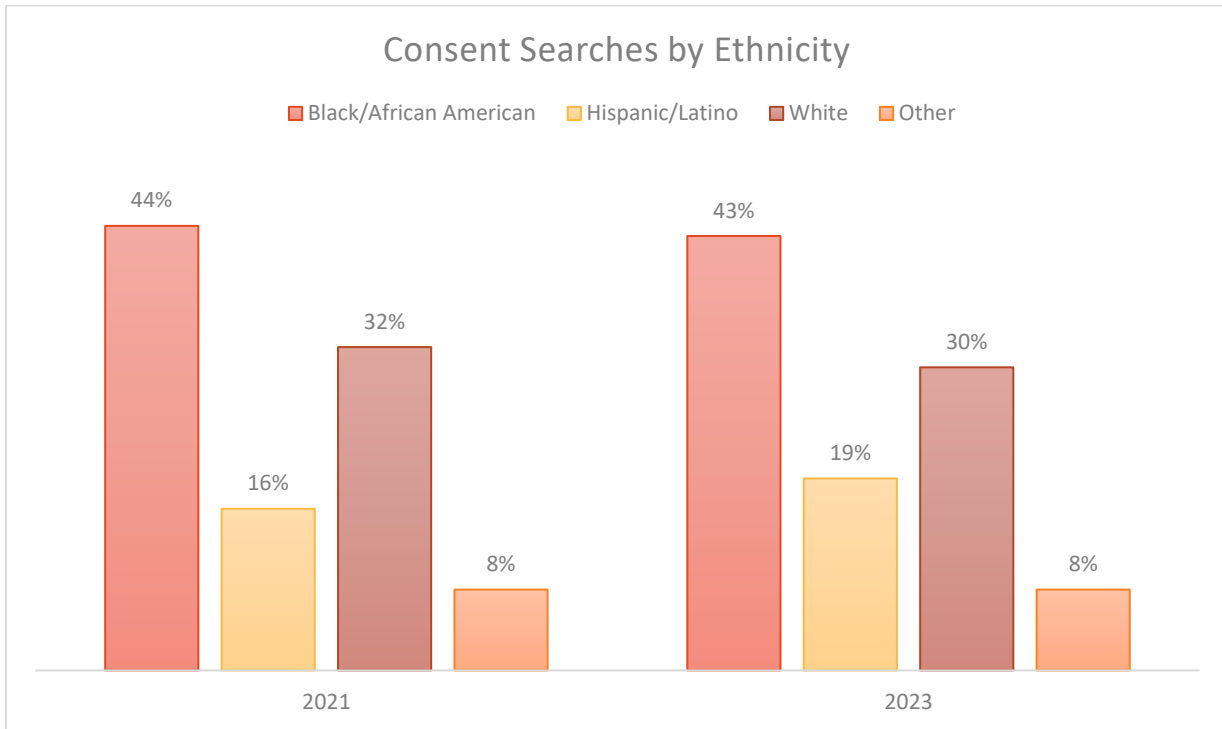
Additionally, recent updates report that periodic audits of several randomly chosen officers have been added to the EIS process. While audits of a few randomly chosen officers may occasionally be useful, the intent of the FIP was to focus on “outliers”, a neutral term of art that refers to those whose performance on certain indicators is outside the BPD average. As the focus of the FIP was on racial disparities, in the case of EIS it is important to focus on those units or officers for whom stops are disproportionately numerous and/or racial disparities most pronounced. The allegations of racism, disdain for the unhoused, and implicit arrest quotas in the Downtown Bike Force have drawn attention to the importance of such a directed focus when doing EIS audits.

In April 2023, City Council referred \$100,000 to the June 2023 budget to hire a consultant for the design and help with implementing a new Early Intervention and Risk Management System. It will take some time before that project is complete. In the interim, EIS audits should be focused on officers who are outliers on the variables stipulated in the Department’s EIS, with a particular focus on racial disparities in stops, arrests, and searches. In addition, a designated PAB Member should serve as an EIS observer.

Written consent search forms. The PAB is pleased that this has been implemented (Policy 311.3). An understanding of the implementation process and its effect would be improved by the inclusion of data in the quarterly BPD reports. Dr. Frank Baumgartner and his team (2018) found that in North Carolina, consent searches declined by 75% in cities that required written permission. PAB analysis of BPD data reveals that the number

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of consent searches decreased from 188 in 2021, to 123 in 2022, and 69 through the first three quarters of 2023. While the number of consent searches has gone down since the introduction of written consent forms, racial disparities in these discretionary searches remain high. In 2021, 44% of consent searches were of Black individuals, 32% were of White individuals, and 16% were of Latinos. Two years later, the respective percentages were 43%, 30%, and 19%. In other words, while the absolute number of people of color undergoing consent searches has decreased with the implementation of written consent forms, the racial disparities in these discretionary searches have not.⁷



Warrantless searches of people on supervised release status. BPD Policy 311.6, as adopted with agreement between the PRC and the BPD and incorporated into the FIP directives, limited warrantless searches of people on supervised release status unless there was reasonable suspicion that they had committed, were committing, or were about to commit a crime. This policy was modified by City Council on July 26, 2022, to make a distinction between people on supervised release for violent crimes (who would be

⁷ These racial disparities in consent searches are comparable to the disparities in all searches. For the period 2020-2023, there were a total of 3244 searches, with 47% of them of Black people, 31% of White people and 17% of Latinos.

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subject to warrantless searches) as opposed to non-violent crimes (for whom reasonable suspicion would be required for a search). The Department under Chief Greenwood had considered the violent/non-violent distinction a challenging one to make in practice and recommended the “reasonable suspicion” standard for all searches of people on supervised release. Have officers found it difficult to implement the “violent”/“non-violent” distinction as Chief Greenwood had suggested? What is the impact of this policy revision on numbers of, and racial disparities in, arrests and searches of people on probation and parole? Future BPD updates should continue to address what, if any, impact this 2022 change in policy has had on racial disparities. Since introduction of the 311.6 policy change in 2020, BPD data no longer included “probation or parole search” as a category. This made sense since those searches were no longer permissible (absent reasonable suspicion). However, since the modification in 2022, probation and parole searches (and other supervised release searches) were allowed if the individual was on probation or parole for a violent offense. Therefore, BPD data should once again include these searches in their data.

Profiling by proxy. According to Chief Louis’s June 2023 update, the Communications Manual “has been amended to address handling cases involving profiling by proxy.” Further, dispatchers “are instructed to be cognizant and screen for profiling by proxy calls.” More specifics need to be provided. Exactly what does the “instruction” consist of? What has the effect been on racial disparities in departmental response to calls for service? As detailed in the City Auditor’s report cited above, law-enforcement actions are lower in stops initiated by the public than in officer-initiated stops. This suggests that more targeted dispatcher instructions and call-screening for profiling by proxy may be necessary.

Resources on police-civilian encounters. The PAB is pleased that the business card directive has been fulfilled. That provision was to ensure that business cards with information on how to commend police officers or file misconduct complaints were distributed upon each officer/civilian encounter. However, the body-worn camera footage that the PAB has received in conjunction with individual misconduct complaints does not reveal any distribution of business cards as directed by Council.

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Fire racist officers identified through social media and other media screens. BPD Policy 1029 (“Employee Speech, Expression, and Social Networking”) stipulates that employees of the BPD whose speech or expression “tends to compromise or damage the mission, function, or reputation...of the Berkeley Police Department” will be held accountable. Two issues arise here: 1) The FIP recommendation included media scans to ensure consistency with this policy, yet this proactive approach does not seem to have been implemented; 2) The FIP recommendation was that “racist officers identified through social media...” shall be fired. The current Policy 1029 is not specific and requires only “accountability”. Thus, it is not clear if this FIP directive has been implemented. One way to move forward on this directive would be to be more specific on what exactly “accountability” means in this context and what preliminary steps would be taken prior to an officer’s termination.

Require regular analysis of BPD stop, search, and use of force data. As noted in the BPD quarterly reports, a Transparency Hub was developed that provides raw data through an Open Data Portal. While this allows members of the public who have the time and ability to analyze the data, the BPD’s Data Analyst should provide more detailed analysis of these data with a focus on racial disparities, as we have done in this report.

Make resources on police-civilian encounters publicly available such as through RAHEEM.org. This Council directive is mentioned in the BPD quarterly updates, but no information is provided regarding its implementation status.

Conclusions and Recommendations

Racial disparities in stops, arrest, and searches remain high, and there is little public accountability for the overall results of the FIP effort due to a lack of statistical reporting or outcome analysis in BPD quarterly updates. While some policy changes have been implemented by the BPD, modification of these changes is needed in some areas. Other FIP recommendations have not been implemented at all.

The PAB offers the following recommendations for action by BPD, the PAB, and City Council with the goals of improving upon steps that have already been taken, ensuring

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that no directives remain unfulfilled, and establishing an expectation for future BPD updates to include analysis of racial disparity outcomes.

Recommendations to the BPD

1. Three-prong approach.
 - a. Definition of Low-Level Traffic Infractions: A definition consistent with SB 50 should be adopted.
 - b. Primary Collision Factors: This prong should specify the mode of the party at fault.
 - c. Community Reports: Under the category of "a variety of unsafe driving incidents," policies should be put in place that specify which calls for service will result in law enforcement action. That specification should be derived from an analysis of the 13% of calls from community members that resulted in a citation or arrest, as per the City Auditor's July 2021 report.
 - d. Community Caretaking: More specificity is needed in this prong, and its components should be based on Berkeley data rather than national statistics, as is done for Prong 1 (Primary Collision Factors). Specifically, the analysis should examine which other factors (non-PCFs) are highly associated with severe and fatal collisions in Berkeley.
 - e. Reporting: Future BPD updates on FIP implementation should include statistical information enabling an analysis of the impact of the three-prong approach on reducing or eliminating stops for low-level offenses—a primary focus of the Council directive—in a manner that supports an overall assessment as well as an understanding of the impact of the approach on reducing racial disparities in traffic stops.
2. Evidence-based definition for stops of criminal suspects.
 - a. Establish an evidence-based definition for stops of criminal suspects.
 - b. Explain how the precision-based policing, feedback loops, and accountability measures, referenced in BPD FIP implementation updates in relation to this recommendation, address the directive to establish an evidence-based definition for stops of criminal suspects.

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3. Enhanced implicit bias training: Ensure that intensive annual training dedicated to the topic of implicit bias is delivered to BPD personnel per the Council's directive.
4. EIS: Pending the deployment of a new EWS, EIS audits should be focused on officers who are outliers on the variables stipulated in the Department's EIS, with a particular focus on racial disparities in stops, arrests, and searches. A designated PAB Member should serve as an observer in this process. Future audit reports should include the scope of what was reviewed and a clear statement of findings.
5. Written consent searches: Future reporting to council should include the number of consent searches conducted per reporting period and their effect on racial disparities in searches, with a comparison to consent search numbers before implementation.
6. Warrantless searches of people on supervised release: Future FIP updates should identify the impact of BPD Policy 311.6 on the numbers of, and racial disparities in, searches and arrests of people on probation and parole.
7. Profiling by proxy: Future BPD updates should specify what instruction dispatchers are given on the topic of profiling by proxy, as well as any impact the instruction and corresponding Communications Manual amendments have had on racial disparities in departmental response to calls for service.
8. Business cards: Ensure that business cards are distributed as mandated by the Council directive.
9. Make resources on police-civilian encounters publicly available, such as through RAHEEM.org.

Recommendations for the PAB

1. Scenario-based training: The 2021 Council item refers to the PAB, recommending the inclusion of a scenario-based training component in the existing officer training required by the California Penal Code. This will be agendized for future PAB meetings in collaboration with the BPD.
2. Crisis Intervention Team (CIT): The 2021 Council item refers to the PAB, recommending the acceleration of CIT activity. This will be taken up in future PAB meetings.

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Recommendations to the City Council

1. Eliminate reporting requirements for fully implemented FIP recommendations.
2. Require BPD to report biannually on:
 - a. Traffic stops by each prong of their 3-prong framework and by race within each prong.
 - b. Stop, search, and arrest data by probation/parole status and race.
 - c. Calls for service by the race of the reporter and reportee.

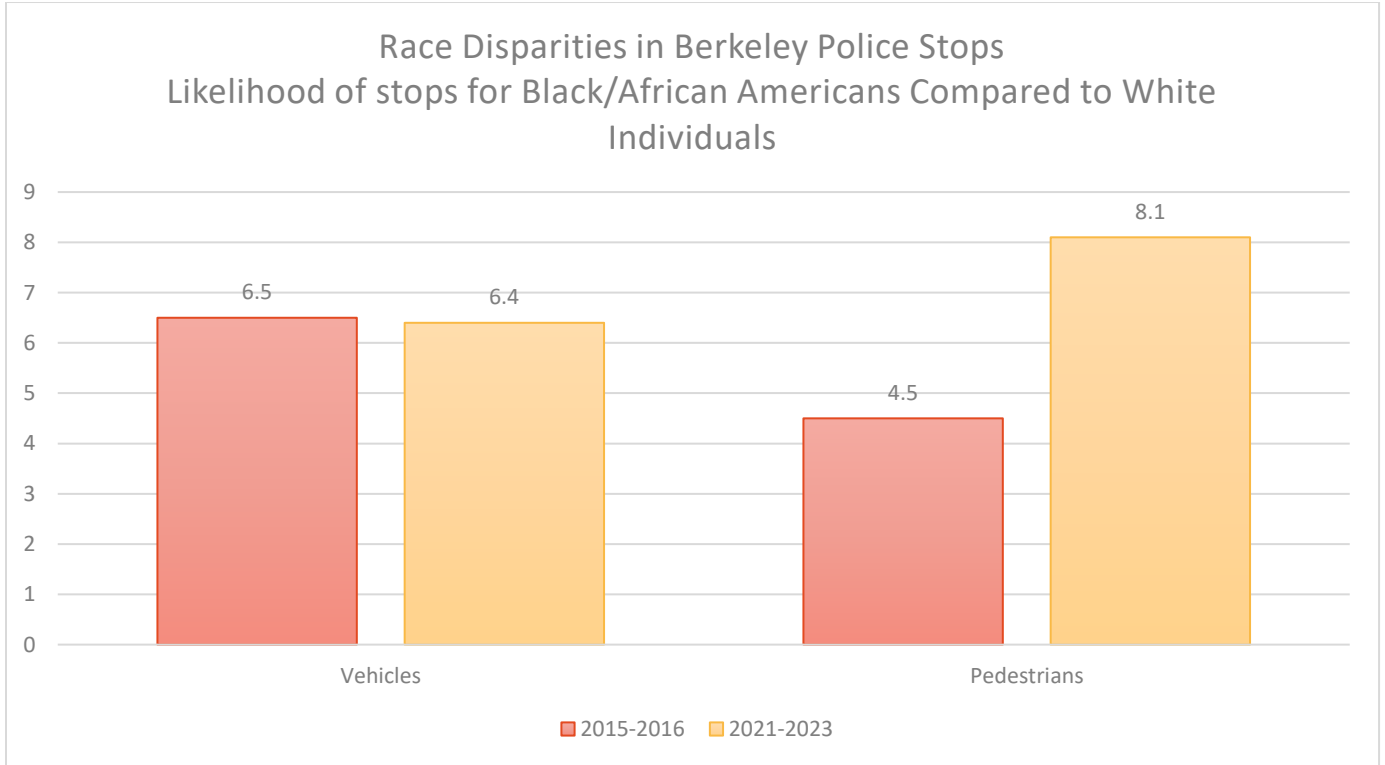
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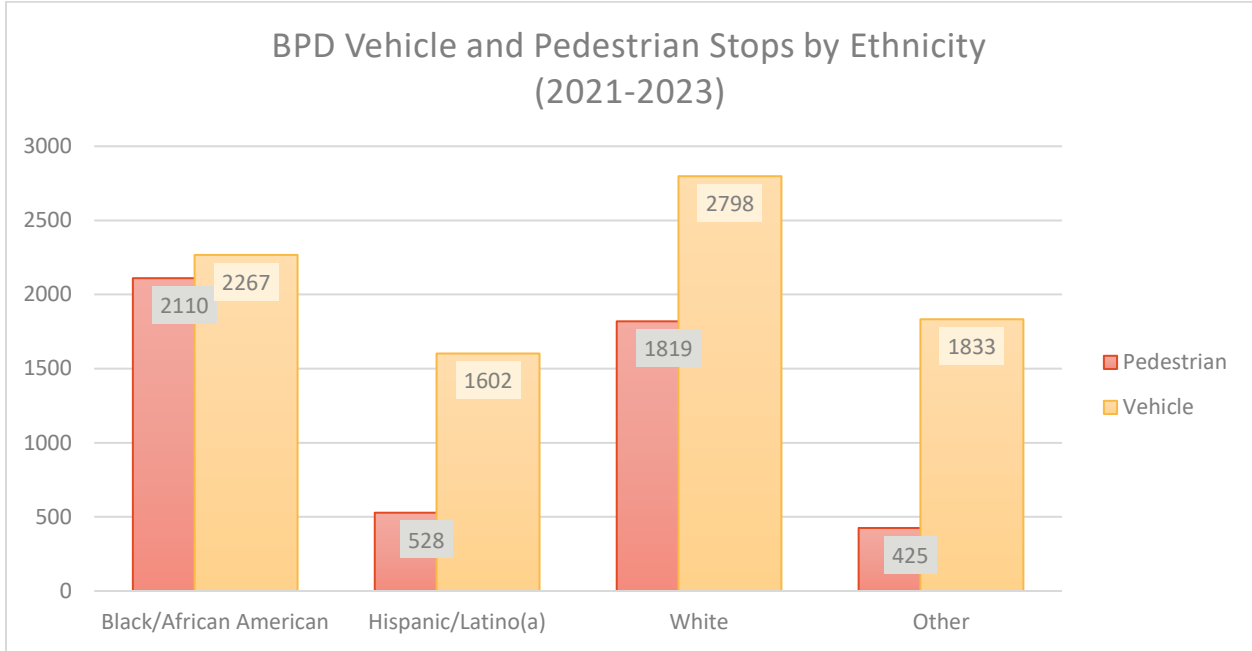
Appendix 1 - Racial disparities for vehicle and pedestrian stops, compared to 2018 CPE Report.

I. Graph 1



II. Table 1

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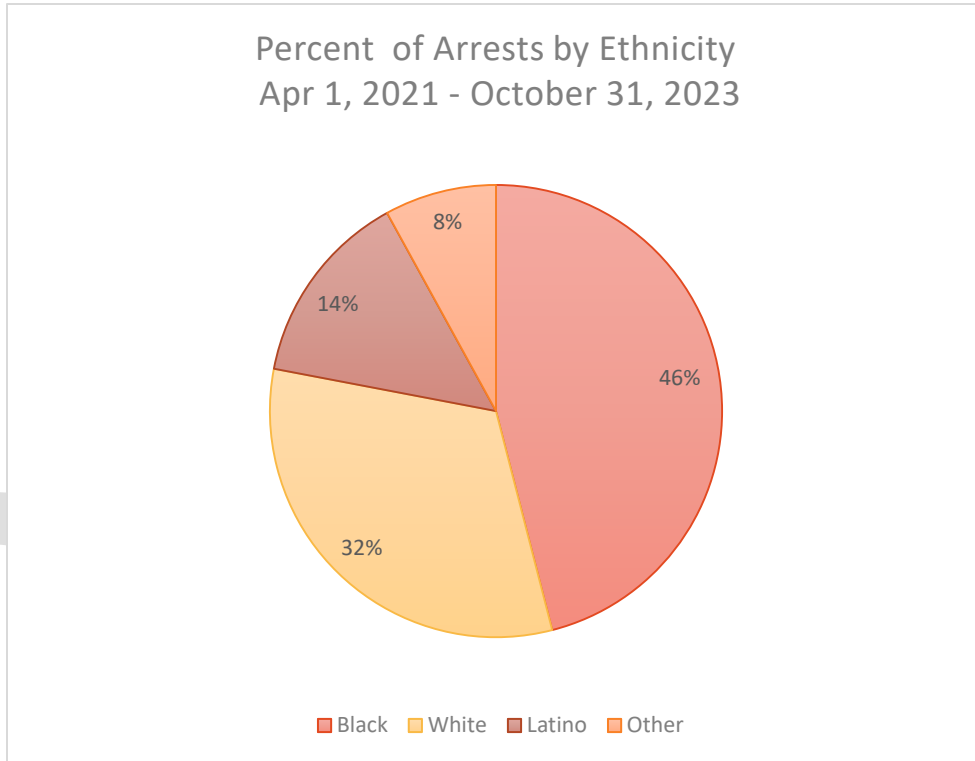
Ethnicity	Pedestrian	Vehicle	Grand Total
Black/African American	2110	2267	4377
Hispanic/Latino(a)	528	1602	2130
White	1819	2798	4617
Other	425	1833	2258
Grand Total	4882	8500	13382

III. Table 2

Ethnicity	Stops of Non-Berkeley Residents	Stops of Berkeley Residents
Black/African American	1615	2814
Hispanic/Latino(a)	1212	955
White	1626	3112
Other	1109	1177
Total	5562	8058

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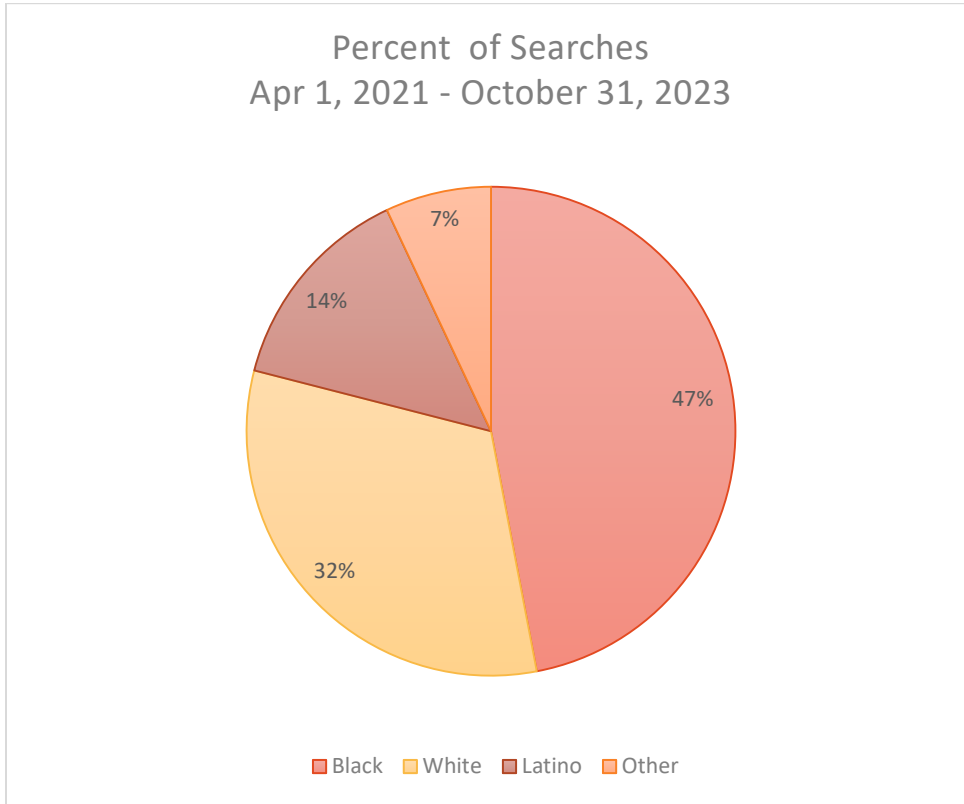
IV. Chart 1



V. Table 3

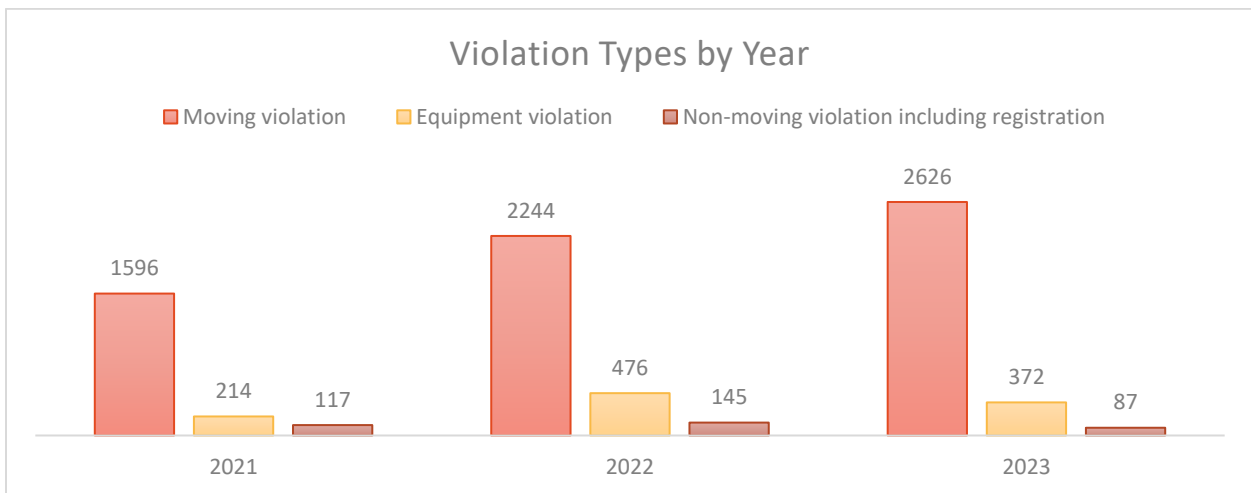
Ethnicity	Number of Arrests
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Hispanic/Latino(a)	2167
White	4738
Other	2286
Grand Total	13620

VI. Chart 2



Appendix 2 – Analysis of low-level traffic stops.

I. Graph 2



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II. Table 4

Year	Moving violation	Equipment violation	Non-moving violation including registration	Grand Total
2021	1596	214	117	1927
2022	2244	476	145	2865
2023	2626	372	87	3085
Grand Total	6466	1062	349	7877

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ATTACHMENT LIST

1. **Mayor's Working Group on Fair and Impartial Policing. Proposal to City Council. February 23, 2021.**
2. **Working Group Recommendations Passed by Council. February 23, 2021**
3. **Summary of BPD Quarterly Updates on Fair and Impartial Policing Implementation**
4. **BPD Three-Pronged Approach to Traffic Enforcement**

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