

Traffic Enforcement

Shifting Sheriff's Office Practices for Improved Traffic Safety

Prepared in Collaboration with:

Congolese Integration Network, Eastside for All, People Power Washington, Transportation Choices Coalition, and Washington for Black Lives, a project of Washington Community Alliance

November 2025



King County

OLEO

OFFICE OF LAW ENFORCEMENT OVERSIGHT

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Shifting Sheriff's Office Practices for Improved Road Safety

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In collaboration with: Congolese Integration Network, Eastside For All, People Power Washington, Transportation Choices Coalition, and with contributions from Washington for Black Lives, a project of Washington Community Alliance



People
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Washington



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OLEO

OFFICE OF LAW ENFORCEMENT OVERSIGHT

The King County Office of Law Enforcement Oversight (OLEO) provides independent oversight of the Sheriff's Office. We conduct objective reviews and independent investigations, and make evidence-based policy recommendations that are guided by the community and rooted in equity. To make these recommendations, OLEO partners and collaborates with community-based organizations.

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A note on the data: Wherever possible, OLEO has opted to use King County-specific data to ensure the accuracy and relevancy of research findings. However, in instances where county-level data is not available, OLEO relies on data on the state or national-level to inform research findings.

Alternate formats available.

Call 206-263-8870 or TTY: 711.

Executive Summary

This Report: Approach and Community-Guided Process

In this report, OLEO and its community partners examine the Sheriff's Office's traffic enforcement practices and issue four recommendations for developing a more data-driven, equitable, and safety-focused traffic enforcement strategy.

This report marks OLEO's first Community Guided Policy Project—completed in collaboration with our partners from the Congolese Integration Network, Eastside For All, People Power Washington, Transportation Choices Coalition, and with contributions from Washington for Black Lives, a project of Washington Community Alliance.^a

To inform this report, OLEO and its partners heard from King County road users about their opinions and priorities around traffic dangers and strategies for enforcement. OLEO also interviewed Sheriff's Office personnel to learn more about the agency's policies and practices around traffic enforcement. OLEO analyzed Sheriff's Office traffic enforcement data from 2020-2024 to better understand the current landscape of traffic enforcement in King County and surveyed national best practices and policy approaches in peer jurisdictions. All research findings were presented to OLEO's partners. The four community-guided recommendations issued in this report were crafted in collaboration with and approved by all of OLEO's partners.

The State of Traffic Safety and Enforcement

While the Sheriff's Office identifies traffic safety as a top priority, the agency does not have an overarching strategy for traffic enforcement. Instead, enforcement is left to the discretion of individual deputies, creating a patchwork approach to traffic enforcement. The Sheriff's Office does not consistently use data to inform traffic enforcement in all its precincts and does not collect complete data for all traffic stops. This means the Sheriff's Office does not have the ability to assess whether its traffic enforcement is effective or how it can be improved. Further, because the Sheriff's Office does not collect demographic information related to traffic stops, they cannot measure whether or not they are enforcing traffic violations equitably or producing disparities.

OLEO's analysis found that slightly more than half (52%) of traffic stops conducted by the Sheriff's Office from 2020-2024 were for traffic violations where the driver did not pose an identifiable risk of harm to themselves or others, such as having an expired registration or a broken taillight.

OLEO's findings indicate that there is significant opportunity for the Sheriff's Office to leverage limited resources and shift its focus to prioritize data-driven and safety-focused traffic enforcement strategies.

Advocates across Washington, and nationally, are calling to focus law enforcement resources on reducing traffic deaths while at the same time addressing the racial and economic disparities resulting from traditional traffic enforcement practices. Research shows that traffic stops in the United States disproportionately impact people of color and low-income communities.¹ OLEO and its partners shaped the recommendations in this report to address the disparities in traffic enforcement and to improve traffic safety for all King County road users.

^a [Read more about the Community Guidance Framework process here.](#)

Recommendations

1.

Revise policy guidance to prioritize enforcement of safety-related traffic violations, restrict non-safety-related traffic stops, and create a data-driven agency-wide traffic enforcement strategy.

- 1.1 Prioritize safety-related stops.
- 1.2 Restrict non-safety-related traffic stops.
- 1.3 Provide data-driven guidance to deputies to promote traffic safety.
- 1.4 Pursue non-punitive measures that address the root causes of traffic violations.

2.

Limit questioning and prohibit consent searches during traffic stops to promote the rights of drivers and reduce racial disparities in enforcement.

- 2.1 Require deputies to limit the scope of their questioning during a traffic stop to the primary reason for initiating the stop.
- 2.2 Require deputies to immediately inform the driver of the initial reason for the stop upon first contact.
- 2.3 Prohibit “consent searches” during traffic stops.

3.

Collect data for all traffic stops—including demographic data—and implement best practices for data collection, storage, and analysis to improve transparency and promote accountability.

- 3.1 Collect and analyze data for all traffic stops.
- 3.2 Collect and analyze traffic stop demographic data.
- 3.3 Streamline data collection practices.

4.

If the Sheriff's Office is considering increasing automated traffic enforcement, King County should first commission an independent feasibility and equity study and require robust community engagement on the potential implementation of automated enforcement.

- 4.1 The Sheriff's Office should not pursue any new or additional automated enforcement until a feasibility and equity study can demonstrate a pathway to mitigate privacy and equity concerns.
- 4.2 Any future plans for implementing additional automated enforcement should be community-driven and aim to address the root causes of traffic safety concerns.

Introduction

Traffic Safety Advocacy Efforts Have Grown in Recent Years, Alongside Concerning Traffic Death Trends

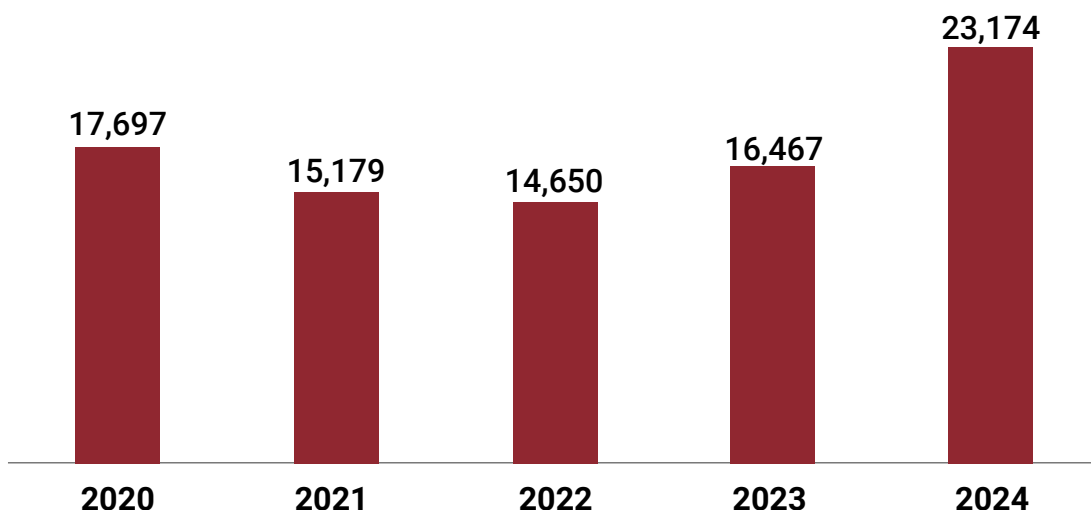
Vehicle crashes are a leading cause of death in the United States.² Nationally, traffic fatalities spiked during the COVID-19 pandemic, and while the last couple years have shown slow improvements in traffic-related deaths on the national level, progress has been slower in Washington state with traffic deaths reaching a 33-year high in 2023.³ King County has seen similar trends, with 118 crashes resulting in fatalities in the Sheriff's Office jurisdiction between 2020-2024.^{b,4}

33-yr traffic death high 

During the COVID-19 pandemic, many jurisdictions scaled back traffic enforcement efforts as fewer cars were on the roads and public health experts urged limiting contact between individuals whenever possible.⁵ Traffic enforcement in King County followed a similar pattern, with the rate of traffic stops declining from 2020 through 2022 and then increasing 40% between 2023 and 2024.⁶

Despite this decline, traffic stops remain the most common interaction between the public and King County deputies,⁷ with deputies initiating more than 87,000 traffic stops between 2020-2024.⁸ However, the impacts of these stops are not felt equally. Nationally, research has repeatedly shown persistent racial bias and profiling in traffic stops and searches as well as disproportionate impacts for low-income communities.⁹

Sheriff's Office Traffic Stops Increased in 2024 Compared to the Previous Four Years



^b "Sheriff's Office jurisdiction" refers to County-maintained roads in unincorporated King County, and roads within the contract cities of Beaux Arts Village, Burien, Carnation, Covington, Kenmore, Maple Valley, Muckleshoot Indian Tribe, Newcastle, Sammamish, SeaTac, Shoreline, Skykomish, and Woodinville. The King County Airport, Metro, and Sound Transit agencies are also included in the Sheriff's Office jurisdiction.

Nationally, and on the state level, advocates and policymakers are working to implement creative solutions to make our roads safer while reducing improper traffic enforcement that worsens racial and economic disparities.¹⁰ Advocates have long argued that enforcement of minor traffic infractions does not make our roads safer,¹¹ has historically been used to target communities of color and low income communities and results in disparate outcomes for those populations,¹² and takes away from an officer's ability to focus on more serious violations like impaired driving, distracted driving, restraint use, and speeding, which are the leading causes of traffic fatalities.¹³ As law enforcement agencies grow capacity to use data, there are opportunities to work with traffic safety experts to tailor enforcement to the most significant traffic safety concerns. New technologies are emerging that—when used correctly and with the guidance of the community—can reduce burdens on law enforcement resources and lead to safer driving. Taken together, new research and creative approaches in peer jurisdictions offer promising new avenues to undo the potential harms of traditional traffic enforcement approaches and make our roads safer.

King County Auditor's Report on Traffic Safety



The King County Auditor's Office (Auditor's Office) conducted an audit of the Sheriff's Office's strategies and practices around traffic enforcement in 2022. The report found that the agency does not have an overarching strategy for traffic enforcement, nor does it assess whether deputies' traffic enforcement activities align with agency goals or impact traffic safety. As a result, traffic enforcement varies across the Sheriff's Office's jurisdiction. The Sheriff's Office also does not systematically collect traffic data for traffic stops or examine whether there are disparities in how its deputies conduct traffic stops. Using the limited data that is collected, the Auditor's Office found that White officers were more likely to use force upon Black motorists than motorists of other races.

The Auditor's Office issued three recommendations to the Sheriff's Office as a result of its findings. As of the publication of this report, the Sheriff's Office has not implemented any of these recommendations.

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."



[***Read the full report here.***](#)

OLEO & Its Partners Collaborate in a Community-Guided Policy Process

Recognizing the recent advocacy on the national and state levels, as well as the concerning traffic death trends, OLEO and its partners sought to evaluate and improve the Sheriff’s Office’s approach to traffic enforcement. This report issues four recommendations that are the product of OLEO’s Community-Guided Policy Process,¹⁴ bringing together several community-based organizations in a collaborative effort.

OLEO’s partners selected traffic enforcement as the focus of this project from a list of five potential policy topics. The traffic enforcement project was completed over the course of a year and included five community-based organizations: Congolese Integration Network, Eastside for All, People Power Washington, Transportation Choices Coalition, and Washington for Black Lives, a project of the Washington Community Alliance. OLEO met with these partners regularly to present and discuss research into the Sheriff’s Office current practices, national best practices, and potential recommendations. OLEO also met with Sheriff’s Office personnel and analyzed available traffic enforcement data. After reviewing the potential recommendations and related research, OLEO’s partners voted to issue the four recommendations in this report. All four recommendations received unanimous support from the community-based organizations who collaborated with OLEO.

Timeline

2024

SEPTEMBER

Kick-off meetings with partners (Congolese Integration Network, People Power Washington, Transportation Choices Coalition, and Washington for Black Lives, a project of Washington Community Alliance).

OCTOBER

Partners chose traffic enforcement as policy project.

NOVEMBER

External outreach phase—OLEO met with the King County Auditor’s Office to discuss their audit and status of their recommendations. Partners began distribution of the Traffic Safety and Enforcement Survey.

DECEMBER

In-person listening sessions held by Congolese Integration Network and Washington for Black Lives.

2025

JANUARY

Closed survey after receiving 187 responses.

FEBRUARY–APRIL

Research phase—Held informational interviews with Sheriff’s Office personnel in various jurisdictions. Received and analyzed traffic enforcement data from Sheriff’s Office.

APRIL

Presented research and policy options to partners. Eastside for All joined as a community partner.

MAY

Met with partners to develop policy recommendations.

JULY

Approved final policy recommendations.

AUGUST–NOVEMBER

Drafted and finalized report. The final report draft was shared with the Sheriff’s Office for review.

The State of Traffic Safety and Enforcement in King County

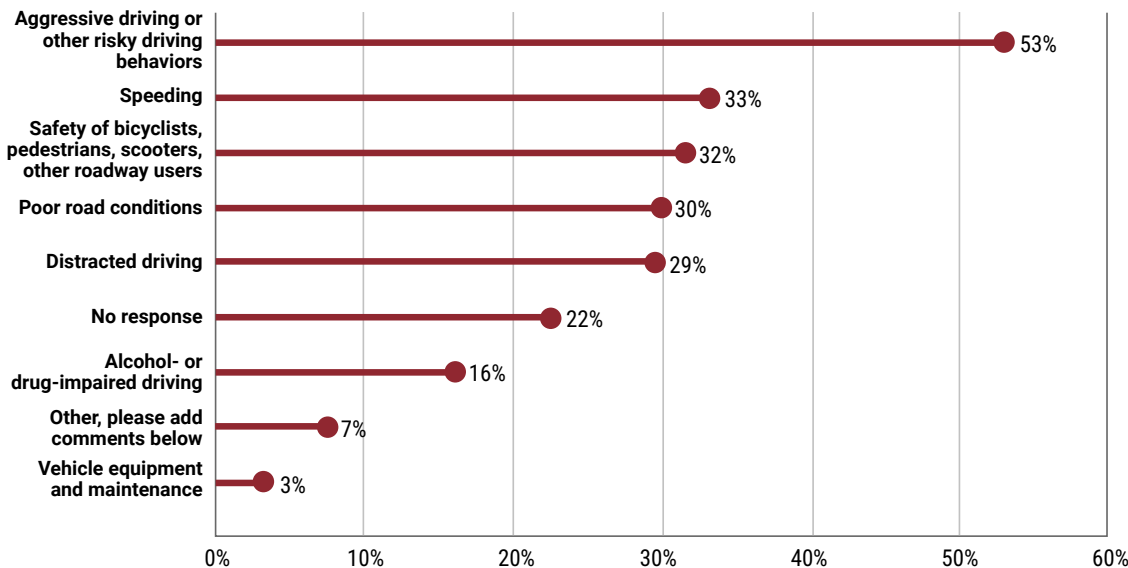


Outreach: Perceptions of Traffic Safety and Enforcement

After identifying traffic safety and enforcement as the project’s focus, OLEO and its partners began with outreach to understand how community members who live, work, and drive in King County feel about the subject. All of OLEO’s partners participated in the outreach phase by either distributing a survey or conducting a listening session.

The survey, developed in collaboration with OLEO’s partners, was open from November 18, 2024 to January 7, 2025, and received a total of 187 responses. All survey questions were optional with a mix of Likert scale and open-ended response questions.^c The survey was online and respondents were able to complete the survey anonymously. OLEO shared the survey with its partners—who distributed the survey with their existing networks—as well as with all cities that contract for services with the Sheriff’s Office, and via the King County’s Unincorporated Area Newsletter.

Respondents Ranked Aggressive Driving, Speeding, and Safety of Non-Car Roadway Users Among Their Top Traffic Safety Concerns



A majority of respondents were White nondisabled women who did not speak a language other than English at home—this is not representative of King County’s diverse communities, limiting the strength of the survey’s findings. With these limitations in mind, OLEO’s analysis of the survey results offered some key insights into road users’ traffic safety concerns. First, respondents named aggressive driving, speeding, and safety of non-car roadway users as their top concerns. Next, roughly a third of respondents believed there should be increased restrictions on vehicle searches during traffic stops, with 12% of respondents emphasizing that stops should only be conducted for legitimate safety

^c At Likert scale is a rating system used to measure respondents’ feelings, attitudes, and perceptions by asking respondents to choose from a from a range of responses on a scale—for example, strongly disagree to strongly agree.

reasons, and 15% expressing that police should not ask questions beyond the initial reason for the stop or conduct pretextual stops.^d

To build on OLEO’s outreach for this project, two partner organizations—the Congolese Integration Network and Washington for Black Lives, a project of the Washington Community Alliance—hosted listening sessions to discuss the survey questions in group settings. This allowed people who did not have technological access to the survey or needed translation services to offer their insights and experiences. Multiple listening sessions occurred in late-November and early-December of 2024. Notably, the demographics of listening session attendees were different than survey respondents. The Congolese Integration Network serves refugees and immigrants primarily from the Sub-Saharan region of Africa. Additionally, Washington for Black Lives held a listening session for single Black fathers.

The listening session attendees echoed survey respondents’ primary concerns, citing aggressive and distracted driving and speeding as top traffic safety concerns. However, some information gathered from the listening session contradicted the survey findings. For example, while survey respondents expressed interest in increased law enforcement presence in their neighborhoods, listening session participants shared feelings of fear toward law enforcement and wanting to limit interactions with law enforcement officers.

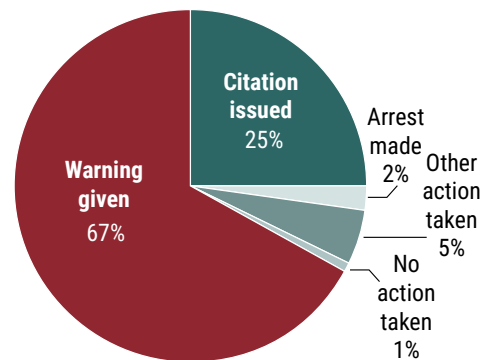
Sheriff’s Office Current Practices

To gain additional context on the policies and practices of the Sheriff’s Office, OLEO conducted several interviews with Sheriff’s Office personnel, ranging in rank, responsibilities, and location. OLEO also participated in ride alongs with deputies specializing in traffic enforcement. These conversations made clear that, despite naming traffic safety as one of the agency’s top priorities for 2025,¹⁵ the Sheriff’s Office does not have a clear agency-wide traffic safety strategy. Traffic enforcement practices are largely left to individual deputies’ discretion and vary widely between contract cities and unincorporated areas of King County.¹⁶

The lack of overarching strategy or guidance regarding traffic enforcement raises serious concerns. **Namely, when enforcement is left to deputy discretion, the agency cannot ensure that King County residents and visitors receive consistent or equitable treatment.** Without proper data collection practices, the agency cannot track specific traffic safety behaviors and resulting enforcement actions across King County. These concerns are consistent with what the Auditor’s Office found in their 2022 audit of the Sheriff’s Office’s practices.¹⁷

To further understand the Sheriff’s Office’s current practices and build off the Auditor’s Office’s 2022 report, OLEO analyzed traffic stop data from 2020-2024. OLEO found that Sheriff’s Office personnel took approximately 112,219 traffic and parking enforcement actions,^e making 87,167 traffic stops.¹⁸ During the same period, two of every three traffic stops ended with a warning. In roughly 25% of traffic stops, deputies issued a citation. Very few stops—just 2%—ended with an arrest.

Traffic Stop Outcomes Across King County, 2020-2024



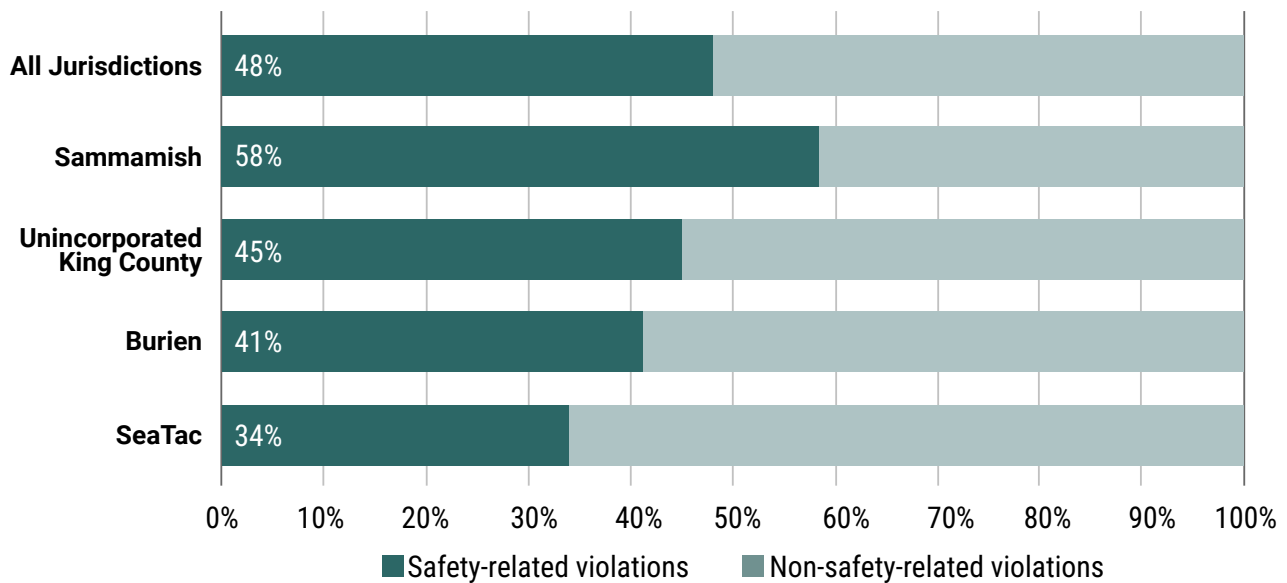
^d A pretextual stop is where a law enforcement officer stops an individual for a minor violation with the intention of conducting a search or investigating a more serious crime. Most searches conducted during a traffic stop are not the result of an officer having a warrant or probable cause to conduct the search, but instead the driver’s consent.

^e This is an estimate based on OLEO’s analysis of the number of traffic-related enforcement entries in the Sheriff’s Office Computer Aided Dispatch (CAD) system. A single CAD entry may sometimes include multiple enforcement actions which may mean this approximation is an undercount.

OLEO analyzed how frequently traffic stops occurred for safety-related violations where the driver posed an identifiable risk of harm to themselves or others compared to stops for non-safety-related traffic violations. When considering all traffic and parking enforcement, stops for non-safety-related violations made up 52% of all enforcement actions by Sheriff’s Office deputies.

Unincorporated King County, Burien, SeaTac, and Sammamish experienced the highest volume of traffic enforcement across the Sheriff’s Office’s jurisdiction. In SeaTac, only 34% of traffic enforcement stops were for safety-related violations, while in Sammamish, that number rose to nearly 60%.

Comparing Safety and Non-Safety Traffic Violations Across King County, 2020-2024



Between 2020 and 2024, Sheriff’s Office personnel used force in 41 traffic stops, less than 0.01% of all traffic stops. While the sample size is small, there are important patterns in the data. In the same period, 3 of 4 civilians involved in use of force incidents were male. Additionally, despite comprising 7% of King County’s population,¹⁹ Black drivers were involved in 30% of traffic stops with use of force incidents, raising concerns that force is disproportionately used against Black drivers.²⁰

Developing Policy Recommendations

With the background and understanding of current challenges on King County roads, OLEO surveyed national research and best practices for addressing traffic safety issues, concerns regarding racial and economic disparities in traffic enforcement, and evaluations of traffic safety and enforcement initiatives in peer jurisdictions. The upcoming section of this report presents the major findings from this research. Potential policy options to address these concerns fell into four major categories: changing policy on traffic enforcement decisions; automated enforcement; civilianization of traffic enforcement,^f and improved practices surrounding data collection and auditing to guide traffic enforcement strategies. OLEO presented findings to its partners who identified the policy recommendations outlined below to be issued to the Sheriff’s Office.

^f Civilianization refers to the use of unarmed civilian personnel to respond to traffic violations rather than armed law enforcement. OLEO and its partners considered research and advocacy around civilianization but ultimately decided not to pursue a recommendation around civilianization in this report.

Recommendations



The following four recommendations were developed in collaboration with OLEO's partners with the goal of improving traffic safety across King County.

1.

Revise policy guidance to prioritize enforcement of safety-related traffic violations, restrict non-safety-related traffic stops, and create a data-driven agency-wide traffic enforcement strategy.

2.

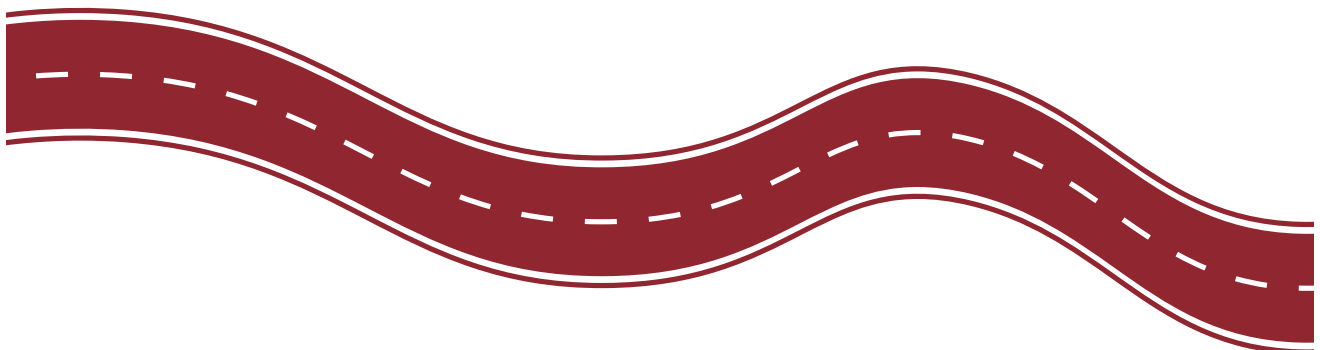
Limit questioning and prohibit consent searches during traffic stops to promote the rights of drivers and reduce racial disparities in enforcement.

3.

Collect data for all traffic stops—including demographic data—and implement best practices for data collection, storage, and analysis to improve transparency and promote accountability.

4.

If the Sheriff's Office is considering increasing automated traffic enforcement, King County should first commission an independent feasibility and equity study and require robust community engagement on the potential implementation of automated enforcement.



Recommendation 1

Revise policy guidance to prioritize enforcement of safety-related traffic violations, restrict non-safety-related traffic stops, and create a data-driven agency-wide traffic enforcement strategy.



Advocates in Washington, and nationally, are calling to prioritize safety-related traffic stops and limit traffic stops for violations that present a low risk to the safety of road users.²¹ A renewed focus on enforcement related to the leading causes of traffic fatalities—including impaired driving, distracted driving, restraint use, and speeding—is urgently needed given the rise in fatal crashes and driving-related injuries across the state.²² Limiting stops for minor violations can improve traffic safety, repair community trust, reduce potential for disparities in policing, and relieve excess financial burdens on communities.²³

Nationally, the potential harms associated with traffic stops are not felt equally—Black drivers are more likely than White drivers to be stopped, and Black and Hispanic drivers are more likely to be searched, ticketed, arrested,²⁴ and even killed during a traffic stop.²⁵ In spite of no evidence of a difference in driving behavior, Black drivers are more likely to be stopped for minor or non-safety-related violations.^{9,26} Policy reforms to limit non-safety traffic stops aim to reduce disparities in traffic enforcement by giving officers guidance to ensure enforcement efforts focus on safety-related violations and limit practices like pretextual stops. For example, in 2022, the Philadelphia City Council prohibited traffic stops for certain low-level non-safety-related violations.²⁷ After implementation, minor violation traffic stops of Black men dropped by 54%—correcting a well-documented pattern of disproportionate enforcement in Philadelphia.²⁸ When Chief Harold Medlock of Fayetteville, North Carolina directed his officers to focus traffic enforcement efforts on the greatest traffic safety concerns and stop enforcing non-safety-related low-level traffic violations, the city experienced a decrease in racial disparities for traffic stops alongside fewer car crashes, traffic-related injuries, and traffic fatalities—all without impacting non-traffic-related crime.²⁹

Traffic enforcement decisions in King County are largely left to the individual discretion of each deputy, resulting in a patchwork approach to traffic safety across the Sheriff's Office jurisdiction. As the Auditor's Office 2022 report notes, the Sheriff's Office does not provide strategic direction for traffic enforcement,³⁰ and without defined metrics and goals, the agency is ill-equipped to ensure its enforcement objectives can achieve safety-related outcomes. OLEO's recommendations promote a data-driven traffic enforcement strategy that direct limited agency resources to address the most significant traffic safety concerns and reduce the potential physical, psychological, and economic harms of traffic stops.³¹

⁹ OLEO does not have access to comprehensive demographic data regarding traffic stops in King County. Per the Auditor's Office's 2022 report, the Sheriff's Office lacks demographic data to analyze racial disparities in traffic enforcement. Currently, the demographic information that the Sheriff's Office collects is inconsistent and unreliable. As a result, in this report information regarding racial disparities in traffic enforcement relies on national data. See Auditor's Office, "Traffic Enforcement: Strategies Needed to Achieve Safety Goals," 2022, <https://kingcounty.gov/en/independents/governance-and-leadership/government-oversight/auditors-office/reports-papers/reports/2022/kcso-traffic-enforcement>.

1.1 Prioritize safety-related stops.

Policy language should state that deputies may stop or detain a driver to enforce any of the following safety-related traffic violations:^h

- a. Any criminal code violation;
- b. Any moving violation (a violation committed by the driver while the vehicle is moving, such as reckless driving or speeding);ⁱ
 - i. Deputies should not take enforcement action for driving with a suspended or revoked license when the suspension or revocation was solely because of:
 - Financial reasons;
 - A violation in another state that would not be grounds for license suspension or revocation if it had been committed in Washington; or
 - Traffic citations or infraction notices that resulted in a suspension relating to intermediate drivers' licenses;^j
- c. Any safety belt or restraint violation;
- d. A violation of the requirement for drivers to pull over or stop for vehicles with emergency lights, stop signage, or sirens.^k

Policy language should further state that deputies should only stop drivers for equipment violations that present a serious risk to the safety of the driver or others on the roadway in order to provide education or information on obtaining repair vouchers. Equipment violations rising to the level of serious risk to the safety of the driver or others on the roadway "means that, based on the totality of the circumstances, it is reasonable for an objective observer to believe that the equipment violation may cause a collision or injury to the driver or other persons or vehicles in the vicinity. [This could include]...having both taillights, headlights, or brake lights off or nonfunctioning during nighttime or where weather conditions limit visibility; a shattered windshield impairing the operator's ability to see; or a dragging muffler."³²

This recommendation should not prevent the Sheriff's Office from taking action to impound a vehicle that is defective in such a way that it presents an immediate danger of collision or injury to the driver and others on the roadway.

1.2 Restrict non-safety-related traffic stops.

Sheriff's Office policy should be updated to prohibit initiating traffic stops for non-safety-related violations except for violations related to a vehicle missing a license plate, or if a license plate does not match the registered make, model, year, and color of the vehicle to ensure the Sheriff's Office can assist in recovery of stolen vehicles. A non-safety-related violation is any paperwork violation relating to insurance, licensing or inspection, registration, and any equipment violation that does not present a serious risk to the safety of the driver or others on the roadway. Jurisdictions across the country have

^h The structure and content of this recommendation is modeled after proposed House Bill 1512 (2025).

ⁱ For a full definition with a list of the vehicle laws for which a violation would amount to a "moving violation," see WAC 308-104-160, <https://app.leg.wa.gov/wac/default.aspx?cite=308-104-160>.

^j See RCW 46.20.342(1)(c) (ii), (v), or (vii), from the language of proposed House Bill 1512(2025), Sec. 3. (1) (a) (ii), [1512.pdf](#).

^k See RCW 46.37.190, <https://app.leg.wa.gov/rcw/default.aspx?cite=46.37.190>.

implemented similar policies, restricting officers from initiating stops for minor violations. In Philadelphia, San Francisco, and Virginia, officers cannot initiate stops for the following violations: expired vehicle registration (with various grace periods), non-functioning lights (unless all lights are not working), or items hanging from the rearview mirror.³³ Other jurisdictions consider the following to be minor violations:

- a. Window tints and decals,³⁴
- b. Relocation of license plates,³⁵
- c. Use of defective equipment,³⁶
- d. Operating an overcrowded vehicle,³⁷ and
- e. Minor bumper issues.³⁸

1.3 Provide data-driven guidance to deputies to promote traffic safety.

The Sheriff's Office should formalize a practice to leverage novel data sources such as municipal traffic agencies to inform enforcement strategies and ensure resources are directed towards the highest impact traffic safety concerns. In interviews with OLEO, Sheriff's Office personnel discussed using available data to target enforcement at intersections and roadways with high rates of safety violations, like speeding or running a red light, but this approach is inconsistent across the agency and often based on individual initiative. Sheriff's Office personnel also shared how the agency can collaborate with traffic engineers and city planners to use data to address road design issues contributing to unsafe traffic conditions.

Sheriff's Office leadership should continue to leverage data from a variety of sources including traffic safety data, community complaints, and historic enforcement data to inform enforcement strategies and coordinate an agency-wide effort to measure enforcement practices and their impact on traffic safety outcomes. Ensuring deputies have clear, data-informed instruction will help reduce the potential for bias to influence enforcement decisions and improve community trust.

1.4 Pursue non-punitive measures that address the root causes of traffic violations.

The Sheriff's Office should address non-safety-related violations with non-punitive measures that can tackle the root cause of the violation, rather than contribute to the problems a driver may be facing. For example, if a driver has not fixed a broken taillight due to limited financial resources, citing the driver and issuing a fine adds to the driver's financial stress and potentially delays the driver's ability to address the taillight violation. It is well documented that fines and fees alone are not effective tools to deter negative behaviors,³⁹ and disproportionately negatively impact people living on low incomes.⁴⁰

In 2024, Burien Police, a Sheriff's Office contract department, conducted 145 car seat inspections and purchased 45 car seats to be provided to families in need via a state-funded grant. OLEO encourages the Sheriff's Office to continue pursuing programs that use non-punitive measures to provide drivers with the equipment they need to operate safely on the road.

Recommendation 2

Limit questioning and prohibit consent searches during traffic stops to promote the rights of drivers and reduce racial disparities in enforcement.



Limiting the scope of questioning a deputy can pursue during a traffic stop and curbing a deputy's ability to ask for the driver's consent to search their vehicle can refocus the Sheriff's Office's limited resources toward enforcement of safety-related violations and reduce racial disparities in traffic enforcement. Although broad scope investigatory questions and "consent searches" are legal, they are strongly associated with coercive and bias-based policing practices.⁴¹ For instance, San Francisco Police Department specifically named the goal of reducing problematic pretextual stops as a justification for their recent policy changes to limit the questions that officers can ask during a traffic stop.⁴² While many jurisdictions are reforming the use of consent searches, Scotland prohibited the searches because they were used at excessively high rates and disproportionately targeted working-class youth.⁴³ After Scotland's prohibition on consent searches, successful searches—where officers found stolen property or drugs—increased and crime trended downward.⁴⁴

Consent searches are of particular concern given how common they are. Unlike other types of searches,^l a consent search exception does not require law enforcement to meet a standard of proof, and, therefore there is no required level of evidence or certainty of crime. Asking for consent to search is left entirely to the individual deputy's discretion and the consent of the individual being searched.

Despite their name, researchers and advocates argue that "consent searches are never really consensual."⁴⁵ Even when the right to refuse a search is explained and understood, legal scholars argue that agreeing with an authority figure like a police officer is not the same as consenting freely, and many do so out of self-preservation, knowing that they could not simply walk or drive away from that encounter and would face other consequences.⁴⁶ Furthermore, vulnerable populations, like children and those with intellectual disabilities, are more likely to "waive" or give up their legal rights because they are more influenced by authority figures and less likely to fully understand the consequences.⁴⁷

Finally, national data shows that consent searches are disproportionately performed on drivers of color and the vast majority do not result in contraband being discovered.⁴⁸ Despite searching Black drivers' vehicles at higher rates, contraband discovery rates are similar or lower for Black drivers compared with White drivers.⁴⁹ Analysis of stop data has also found that the bar for searching Black and Hispanic drivers is lower than for searching White drivers.⁵⁰ While some in law enforcement argue that consent searches are an important investigatory tool, researchers have found that consent searches are less likely to result in contraband being found than searches based on probable cause,^m and that there is no relationship between the use of consent searches and rates of violent crime.⁵¹

^l When searches are conducted under a warrant, probable cause, or reasonable suspicion, there is a "standard of proof," or a level of evidence, that law enforcement must meet to do the search. This creates a uniform bar and establishes authority for law enforcement when interfering with the Fourth Amendment right to be free of an unreasonable search.

^m This study demonstrates that consent searches are less effective than searches requiring a higher standard of proof, but OLEO also acknowledges that searches based on probable cause without a warrant have been prohibited in Washington by the State Supreme Court. *State of Washington v. Tibbles* (2010).

Despite numerous and significant concerns regarding the practice, the Sheriff's Office commonly performs consent searches when "lawful and reasonable," but they are not tracked in a systematic or accessible way that would allow for analysis or public transparency.⁵² Similarly, without additional policy and training safeguards for questions and conduct during a traffic stop, Sheriff's Office deputies could engage in troubling investigatory tactics at the cost of trust and community relationships.

2.1 Require deputies to limit the scope of their questioning during a traffic stop to the primary reason for initiating the stop.

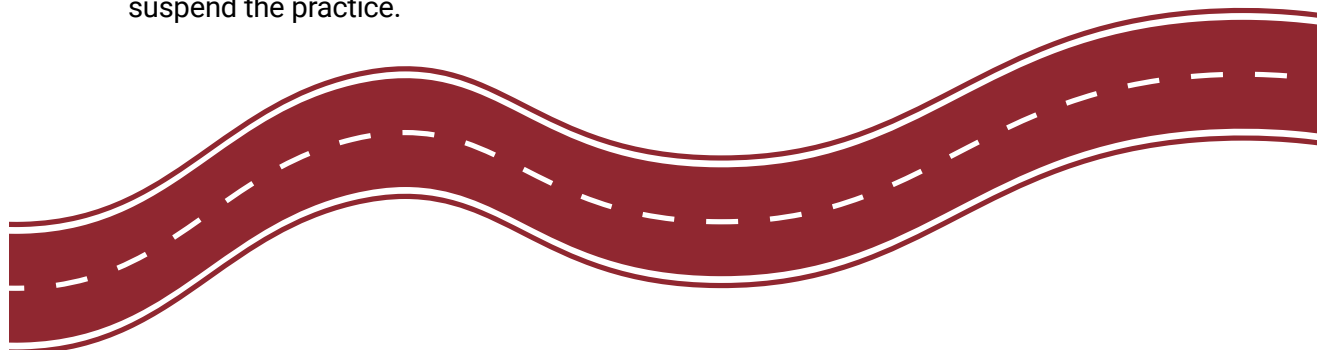
The Sheriff's Office should ensure traffic stops are targeted to address specific traffic safety violations, rather than be used as a general investigatory tool. Limiting questions throughout a traffic stop to address the reason for the stop ensures that deputies are responding to dangerous behaviors, which promotes traffic safety and driver education. However, the policy language should make clear that if a deputy has reasonable suspicion that criminal activity has occurred, is occurring, or is about to occur, they may proceed with additional investigation.⁵³ This recommendation is aimed at limiting pretextual stops, which have been found to disproportionately target Black drivers nationally.⁵⁴ The limitation on the scope of questioning should not prevent a deputy from speaking to a driver about additional or multiple traffic safety violations they may have committed, and it should not prevent a deputy from educating a driver about a non-safety-related violation or providing a repair voucher.

2.2 Require deputies to immediately inform the driver of the initial reason for the stop upon first contact.

Policy guidance should set an expectation for clear communication at the outset of a stop to promote understanding between deputies and drivers and improve relationships between law enforcement and the community.⁵⁵ Initiating a traffic stop with respect and transparency aligns with the Sheriff's Office commitment to procedural justice and is proven to signal trustworthiness to community members.⁵⁶ It is well documented that acting in alignment with the tenets of procedural justice can improve voluntary compliance and cooperation from drivers and help to prevent a traffic stop from escalating.⁵⁷

2.3 Prohibit "consent searches" during traffic stops.

OLEO recommends the Sheriff's Office discontinue the use of consent searches during traffic stops. The practice raises several serious concerns: coercion, racial disparities in searches, and the standard of proof for searches. While it is technically legal to conduct a consent search, scholars argue that a search will never truly be consensual. Given these significant concerns, and the Sheriff's Office lack of uniform strategy and data regarding consent searches to better understand searches' impact, OLEO recommends that the Sheriff's Office suspend the practice.



Recommendation 3

Collect data for all traffic stops—including demographic data—and implement best practices for data collection, storage, and analysis to improve transparency and promote accountability.



Improving data collection practices would allow the Sheriff's Office to analyze efficiency, equity, and outliers in deputy behavior and aid the creation of an overarching agency-wide strategy to address traffic safety.⁵⁸ While data can be a crucial tool leveraged to improve traffic safety across the Sheriff's Office jurisdiction, the usefulness of collected data is limited by its quality and ability to be analyzed. National advocates have developed strategies for collecting analyzable data for all traffic stops while reducing unnecessary administrative burden for officers.⁵⁹ Currently, while the Sheriff's Office collects some information for traffic stops, that data is not complete, publicly accessible, or easy to analyze. It is crucial that data is made publicly available, as high-quality and detailed data can improve confidence in law enforcement among the public and media, improve policy evaluations, and shape strategy.⁶⁰

3.1 Collect and analyze data for all traffic stops.

The Sheriff's Office should record all traffic stops, regardless of outcome, and collect data about the individuals involved in each stop for improved documentation of the Sheriff's Office traffic enforcement procedures. Sheriff's Office personnel expressed concern that requiring more data collection at traffic stops would discourage deputies from making traffic stops. However, the administrative burden on deputies can be minimized by using drop-down menus that allow easier selection of data in the computer-aided dispatch (CAD) system. Additionally, collecting data during all traffic stops will reduce administrative burdens over time by providing insights on where resources are spent, and how the Sheriff's Office can develop and streamline resources for traffic enforcement with maximum impact. All traffic stops includes stops:

- a. Made for educational purposes,
- b. Where a verbal warning is given,
- c. Because of a roadblock or checkpoint created by the Sheriff's Office or staffed by Sheriff's Office personnel,
- d. Where a warning is issued,
- e. Where a citation is issued, or
- f. Where an arrest is made.

Data collected at all stops should include the:

- a. Reason for initiating the stop;
- b. Outcome of the stop (such as education, verbal warning, formal warning, citation, arrest, etc.);
- c. Time and location of the stop;
- d. Personnel involved in the stop, including:

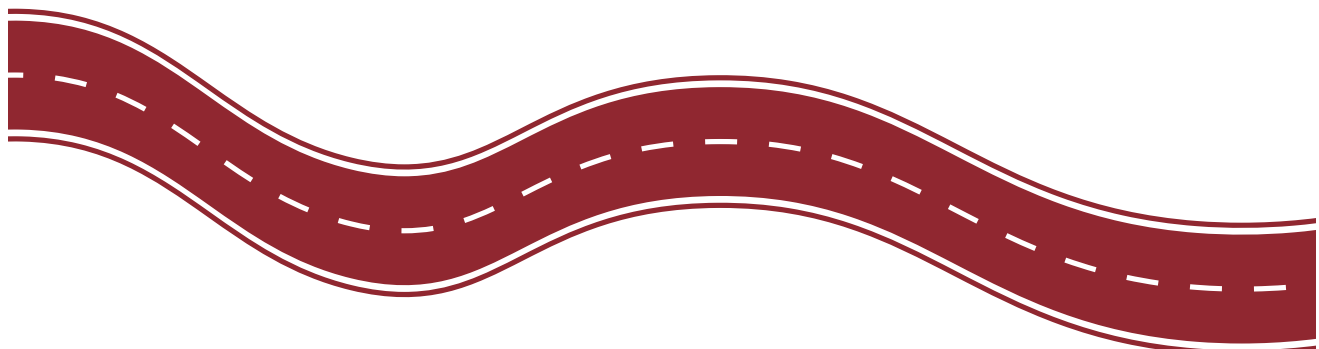
- i. Demographic characteristics (race, gender, age); and
- ii. Agency characteristics (rank, years on the force); and
- e. Action(s) taken by the deputy during the stop, including:
 - i. If there was a(n) individual removed from vehicle, individual removed from vehicle by physical contact, curbside detention, handcuffing, or canine search;
 - ii. If a search was conducted and why;
 - iii. The result of a search (contraband, weapons, stolen property, money, no items found, etc.);
 - iv. Descriptions of seized property; and
 - v. Use of force information.

3.2 Collect and analyze traffic stop demographic data.

To measure whether and to what extent the Sheriff’s Office traffic enforcement practices may have disparate impacts on communities in King County, demographic information should be collected for all traffic stops. The Auditor’s Office 2022 report found that “the Sheriff’s Office does not systematically collect or analyze traffic stop demographic data as part of its operations. This means the Sheriff’s Office is unable to assess potential disparities in traffic stops.”⁶¹ The Auditor’s Office recommended that the Sheriff’s Office collect perceived demographic data for each traffic stop, regardless of the purpose of the stop or its outcome.

Sheriff’s Office personnel expressed hesitancy and discomfort regarding documenting perceived demographic information at traffic stops. Concerns included inaccuracy, impracticality, and disrupting rapport between deputies and drivers. However, according to the U.S. Department of Justice, it is best practice to record an officer’s perception of an individual’s identity as that perception is what would potentially result in racial profiling or bias towards an individual—regardless of the accuracy of the perception.⁶²

OLEO supports and reiterates the recommendation that the Sheriff’s Office collect perceived demographic data at all traffic stops. Deputies should not ask stopped individuals to self-identify the characteristics outlined below.⁶³



This recommendation is modeled after California’s Racial and Identity Profiling Act of 2015 aimed at reducing racial profiling in law enforcement. In California, officers are required to collect perceived demographic data for all vehicle and pedestrian stops.⁶⁴ Collected demographic data should include:

- a. Deputy’s perception of the stopped individual(s) race or ethnicity,ⁿ gender, sexual orientation,^o age, disability status, and English proficiency;
- b. If the stopped individual appears to be experiencing a mental or behavioral health crisis; and
- c. The deputy’s race or ethnicity and years of service.^p

3.3 Streamline data collection practices.

As the Sheriff’s Office is currently updating its data software,^q OLEO recommends using this opportunity to develop standard processes regarding data collection for all data software (including but not limited to CAD, IAPro, Mark 43, and Sector^r), so that data input by different personnel is as uniform as possible, resulting in high-quality data. Standardized data processes would also improve the ability to analyze data collected, allowing the data to be leveraged for best impact.

- a. Software should be cross-referenced with the Sheriff’s Office General Orders Manual to ensure that data entry fields are consistent with enforcement actions permitted per policy.

ⁿ OLEO recommends that the Sheriff’s Office uses the racial and ethnic groups included in the U.S. Census Bureau so that data can best be analyzed against other databases: White, Black and African American, Asian, Native Hawaiian and Pacific Islander, Native American, Hispanic and Latinx, and Multiracial. OLEO recognizes that this list does not comprehensively capture the races and ethnic identities of King County’s residents and welcomes community feedback to better address these data challenges.

^o Advocates for LGBTQ+ communities have legitimate concerns about law enforcement collecting information on an individuals’ sexuality or gender due to of fears of further marginalization and reinforcing existing biases. However, in order to assess disparities and track evidence of profiling based on sexuality or gender, it is recommended that officers record their own perception of an individual’s gender and sexuality. This creates data points that show an officer’s belief about the individual they are stopping, which can reveal evidence of profiling and prompt necessary reforms. See Leonore F. Carpenter and R. Barrett Marshall, “Walking While Trans: Profiling of Transgender Women by Law Enforcement, and the Problem of Proof,” *William & Mary Journal of Race, Gender, and Social Justice*, November 2017, <https://scholarship.law.wm.edu/cgi/viewcontent.cgi?article=1461&context=wmjowl>.

^p OLEO encourages the Sheriff’s Office to identify methods to retain this information for each deputy so that it does not require manual entry at every traffic stop. It is best practice to collect this information and remove all personally identifiable information including names and badge numbers—this can be achieved by assigning each deputy a unique identifier. See Marie Pryor, Phillip Atiba Goff, Farhang Heydari, and Barry Friedman, “Collecting, Analyzing, and Responding to Stop Data: A Guidebook for Law Enforcement Agencies, Government, and Communities,” 2020, The Center on Policing Equity, the Policing Project at New York University School of Law, and the California Department of Justice, <https://static1.squarespace.com/static/58a33e881b631bc60d4f8b31/t/5f7335d7294be10059d32d1c/1601385959666/COPS-Guidebook+Final+Release+Version.pdf>.

^q The Sheriff’s Office is currently working to move to a new CAD system.

^r The Sheriff’s Office uses several software to organize data, including those listed: The CAD system is used when deputies are responding to calls and issuing warnings and citations. IAPro is a software used to track internal investigations and use of force cases. Mark43 is a database that includes all data collected when an arrest is made. Finally, Sector, which is run by the Washington State Patrol stores state-wide traffic enforcement data. It is possible for a single case to have data stored across multiple software, making analysis complex and time-intensive.

- b. Data regarding traffic stops should be stored in a single software to ease analysis processes. Data on the total number of traffic stops, general location of traffic stops, outcome of traffic stops, and demographics should be made publicly available.
- c. All deputies should complete regular and ongoing comprehensive trainings on how to use Sheriff's Office data collection tools.
- d. The Sheriff's Office should utilize software that automatically identify contradictions and missing fields to minimize erroneous data.

Recommendation 4

If the Sheriff's Office is considering increasing automated traffic enforcement, King County should first commission an independent feasibility and equity study and require robust community engagement on the potential implementation of automated enforcement.



“Automated enforcement” is a traffic enforcement strategy that relies on cameras to capture a photograph of the license plate of vehicles committing infractions and sends a warning or ticket in the mail to the registered vehicle owner.⁶⁵ Cameras are most frequently used to track speeding and red-light violations, although nationally, jurisdictions are experimenting with other forms of automated enforcement such as using cameras to detect distracted driving.⁶⁶ Currently, red-light cameras are used sparingly across the Sheriff's Office jurisdiction, primarily in the city of Kenmore.⁶⁷

The use of automated enforcement poses potential benefits and drawbacks for deputies and community members alike. A primary benefit of the use of automated enforcement is that they limit the number of traffic stops being made, reducing the likelihood of dangerous altercations and psychologically harmful interactions between Sheriff's Office personnel and community members.⁶⁸ They can also be effective at changing dangerous driving behaviors and reducing collisions.⁶⁹

However, automated enforcement can create privacy and surveillance concerns.⁷⁰ Most speed cameras use automatic license plate reader (ALPR) technology which capture up to 1,800 plates per minute. Law enforcement agencies have used this ALPR technology to monitor marginalized communities, including communities of color and people living on low incomes.⁷¹ ALPR companies, that collect and store sensitive location data, are also being accused of violating state laws by sharing vehicle location information with federal border enforcement agencies.⁷² And, the contracts that law enforcement agencies sign with ALPR vendors are not made public, preventing transparency with the public.

Automated enforcement can also worsen racial and economic disparities in traffic enforcement because of the placement of cameras in high-speed corridors which are often located in densely populated neighborhoods with high proportions of residents of color and people living on low incomes.⁷³ Consequently, the fines associated with automated traffic citations are more likely to fall on drivers of color and low-income drivers who might not be able to afford to pay a ticket.⁷⁴

While OLEO isn't aware of any current plans to expand the use of automated enforcement in King County, the Sheriff's Office should exercise caution around increasing automated enforcement due to limited budget as well as the above-listed concerns. Additional concerns surrounding automated

enforcement are that the fines are excessive and revenue-driven and that automated enforcement does not address the root causes of dangerous traffic conditions.⁷⁵ Research shows that improving road design can be more effective at improving traffic safety (e.g., installing roundabouts in place of signals or stop signs reduces injury-causing crashes by 75%).⁷⁶

4.1 The Sheriff's Office should not pursue any new or additional automated enforcement until a feasibility and equity study can demonstrate a pathway to mitigate privacy and equity concerns.

Given the evidence that automated enforcement can disproportionately burden low-income populations and communities of color,⁷⁷ OLEO recommends that King County pursue further research before expanding automated enforcement such as additional camera placement, expanded use of existing cameras (e.g., using an existing school zone camera outside of current use hours and purposes), or new types of automated enforcement technology across the Sheriff's Office jurisdiction. The feasibility and equity study should examine:

- a. Which communities experience disproportionate levels of traffic safety concerns such as speeding and red-light violations, and would therefore benefit most from automated enforcement;
- b. Whether funding can effectively be used for addressing or improving road design rather than automated enforcement;
- c. If increasing use of cameras would have disparate racial impacts across King County;
- d. The effectiveness of existing cameras in use in the Sheriff's Office jurisdiction at improving traffic safety—the metric of success should not be revenue generation or number of citations issued;
- e. Current revenue use, privacy concerns, and equity impacts of existing automated enforcement in the Sheriff's Office jurisdiction;
- f. Data sharing practices between jurisdictions and federal law enforcement agencies;
- g. How private companies or contractors and their software are utilized, including their data sharing practices; and
- h. Data use and storage procedures.

The feasibility and equity study should be conducted by an agency independent from the Sheriff's Office and be developed in partnership with local communities across the Sheriff's Office jurisdiction to ensure that impacted populations have ample opportunity to provide feedback and input throughout the process.

4.2 Any future plans for implementing additional automated enforcement should be community-driven and aim to address the root causes of traffic safety concerns.

OLEO recommends any efforts to pursue automated enforcement measures be undertaken in partnership with communities. If, following the completion and publication of a feasibility and equity study, the Sheriff's Office and its local government partners plan to pursue additional automated enforcement, community members should participate fully in decisions regarding the location of automated enforcement cameras and enforcement strategies, including penalties, to ensure the program prioritizes traffic safety issues.

Any future automated enforcement program should aim to minimize the harmful consequences of financial penalties associated with automated enforcement which fail to address the root causes of traffic safety concerns. Jurisdictions should consider:

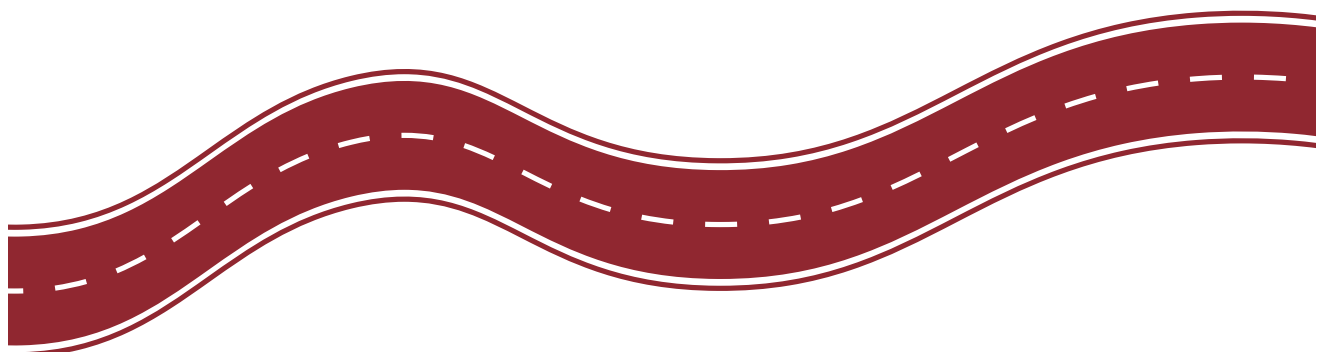
- a. Potential pilot programs for citations that do not issue fine-based penalties and instead utilize warnings for a set period;
- b. The levels of fine and payment options (e.g., income-based fines or no-cost payment plans) and alternatives that will be used (e.g., fix-it tickets or community service options); and
- c. How to ensure any revenue generated from automated enforcement is reinvested in community-identified road design and traffic safety infrastructure improvements.

Conclusion

OLEO partners named traffic safety and enforcement as a top concern of those who live, work, and drive in King County. Given that traffic stops are the most common interactions between the public and law enforcement, it is highly important that the Sheriff’s Office have clear traffic enforcement policies and procedures that are responsive to community needs.⁷⁸

In 2022, the Auditor’s Office conducted an audit of the Sheriff’s Office traffic enforcement practices.⁷⁹ The report found that the agency lacks strategic guidance for traffic enforcement and does not collect comprehensive traffic stop data. The information collected throughout OLEO’s outreach phase confirms these findings.

OLEO and its partners developed additional recommendations for the Sheriff’s Office’s traffic enforcement strategy, in an effort to improve traffic safety, promote equitable enforcement practices, and encourage proper data collection. After presenting the recommendations to the King County Council and Sheriff’s Office, OLEO plans to monitor the recommendations’ implementation, so its partners and King County communities remain informed regarding steps taken to improve traffic safety and enforcement practices across King County.⁸⁰



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