



IDOT TRAFFIC STOP DATA TASK FORCE

**CITY OF URBANA
HUMAN RELATIONS OFFICE
400 South Vine Street
Urbana, IL 61801**

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MAYOR

PUBLIC COMMENT COVER PAGE

**THE ATTACHED IS PUBLIC COMMENT ON THE
“PRELIMINARY REPORT” PUBLISHED ON 07/06/2015
BY THE URBANA IDOT TRAFFIC STOP DATA TASK FORCE**

Comments Submitted by:	Durl Kruse
Date Received:	July 7, 2015

TASK FORCE INFORMATION:

The I.D.O.T. Traffic Stop Data Task Force was established by Urbana City Council Resolution NO. 2014-01-002.

The Task Force is charged with identifying and studying any racial disparities that may exist in local traffic stop data supplied annually to the City by the Illinois Department of Transportation (I.D.O.T.), and attempting to find the source and cause of any disparity. The Task Force is directed to examine multiple aspects of the traffic stop data, including race, driver age, residence, stop time, stop location, the reason for the stop, vehicle age, and any other information the Task Force finds to be useful. The Task Force will also look beyond traffic stop data to consider census and unemployment data, high school graduation rates, and incarceration statistics from the September 2013 study of the Champaign County justice system.

FOR ADDITIONAL INFORMATION ABOUT THE TASK FORCE:

On the web, visit <http://urbanaininois.us/boards/idot-traffic-stop-data-task-force>; or

Contact the Urbana Human Relations Office by mail to: 400 South Vine Street, Urbana, Illinois 61801-3336; by email to acweck@urbanaininois.us; by telephone to (217) 384-2455; or by fax to: (217) 328-8288.

On Jul 6, 2015, at 9:02 PM, Durl Kruse <jandurl@comcast.net> wrote:

Unfortunately I was not aware the Task Force had rescheduled its Monday meeting for this past Thursday. After reading the Friday N-G article I checked the city website and have read the draft report. I would like to offer a few suggestions for the Task Force to consider at its July 15 meeting. Clearly the report is taking shape and the work and efforts of everyone is coming to fruition. You are to be commended for giving the City Council and community a substantive and meaningful report.

Durl Kruse

PS-Hopefully Todd can forward this email to the rest of the Task Force members.

I will break my comments into three sections: general comments, improving clarity of language, and minor revisions to the report recommendations.

GENERAL COMMENTS:

1. Page 1: You identify your four major areas of study. Within the timeframe with which you had to work, I feel the Task Force did a reasonably good job addressing topics 1-3, Literature, Statistics, and Impact. Regarding police procedures, I feel a more detailed and nuanced public examination of specific UPD traffic stop procedures, strategies, and tactics should have occurred. In particular a more descriptive analysis of traffic stop training, current UPD traffic stop procedures and policies (written and non written), a clearer understanding of when, why, and how the UPD conducts investigatory stops, and a survey of beat officers' feedback would have helped greatly in examining and understanding the philosophy and dynamic of various UPD traffic stop interactions.

2. Page 3: The Context section is very well written and excellent in highlighting the interrelationship of historical and local of policing practices as they relate to race and community. The Task Force's point that "*law enforcement is the community's mechanism to enforce its own standards. Significant discontinuity between the community's sanctioned methods and law enforcement's utilized methods raises serious concerns about the legitimacy of particular law enforcement methods*" establishes a clear and forceful understanding of **why** our community should continue to have a dialogue as to how to reduce traffic stop racial disparities while insuring public safety for everyone.

3. Page 4: **Include and define the three types of stops being tracked by the UPD in the definition section: "Traffic Stop", "Patrol Stop" and "Community Caregiving Stop"**. The first two types of stops are slightly defined on page 27, but nowhere in this report is "Community Caregiving Stop" defined. All three need to be clearly defined leaving little ambiguity for officers or the public as to what distinguishes each from the other. This is critical for future data collection and interpretation that tracks whether investigatory stops contribute to racial disparities and/or crime reduction.

WORDING REVISIONS/CHANGES:

1. Page 4 “Investigatory stop” definition: Your report states that the **primary reason** for making an investigatory stop is to engage in further investigation of other **potential crimes in the area where the stop is made**. Although this is certainly one reason for making an investigatory stop, research clearly concludes it is not the only nor possibly even the primary reason. Other reasons include to “**check suspicious behavior**”, “**search for contraband**”, and “**intimidate or harass certain individuals**”. Few of these reasons have anything to do with directly “investigating a specific crime” but rather police discretion of who to watch and monitor because of past behavior or race.

I suggest the following rewording: “....., *the reasons for making an investigatory stop are multi-faceted, including but not limited to the investigation of potential crimes in an area, to check suspicious behavior, and to search for vehicular contraband.*”

2. Page 6: Bullet Two - I’m not sure that a statistician can identify “bias”, but I know he can identify numerical disparities. Therefore I suggest the word “bias” be replaced with “**any racial disparities**” that may exist.

3. Page 6 Bullet Three - “The Task Force is recommending crime statistics should be regularly reviewed to assure that any differences in police tactics.....” But WHO is to do the reviewing? Certainly the Task Force is not suggesting it be the sole responsibility of the UPD to justify police tactics by crime reduction and determine the negative impact such tactics have on the communities where they are used. Clearly the UPD and community must do this together to be meaningful and to build community trust. Therefore I suggest the following language: “*Crime statistics should be regularly reviewed co-jointly by the UPD and representatives of the minority community to assure that any differences in police.....*”

4. Page 21 Testimonial #2 - grammatical correction - delete *Cathy* in line17.

5. Page 22 Testimonial #3 continued - several grammatical corrections

6. Page 27 - Traffic and Patrol stops are briefly defined in the first paragraph, but not Community Caregiving stops. Would be helpful to reader to add brief definition of Community Caregiving stops here also.

REPORT RECOMMENDATIONS:

1. Page 28 Bullet One Recommendation:

While the collection of traffic stop data by “category” is a good addition to the UPD data collection, it falls FAR short of easily identifying when an “investigatory stop” is also a part of a patrol, safety, or community caregiving stop. Yet it is the “investigatory stop” that is crucial to tracking in order to understand its effect in reducing crime and whether it contributes to racial disparities. Unless the UPD and community devises a clearer and more systematic way of

tracking investigatory stops, I fear frustration and ambiguity will negatively effect future data analysis. I encourage the incorporation of the following language into this recommendation:

*The collection of traffic stop “category” data as instituted is a good addition to the data collected by the Police Department. These categories should be reviewed and changed as necessary to **improve and inform data collection**. In addition to category of stop, **whether that stop included an investigatory component should be immediately added to the data collection by adding a check box noting such on the citation or warning ticket**. Additional pieces of data (for example, reason for length of stop) should also be collected.*

2. Page 29 Bullet One Recommendation:

I do not understand the phrase, neither do I know where the Task Force concluded: “*Training on the proper use of traffic stops appears to be effective, this should be continued.*” What specific training are you referring to and how have you concluded it to be effective? Where is the evidence???? Traffic stop data show a range of racial disparities and it has yet to be determined whether UPD’s traffic stop tactics actually do reduce crime more effectively than other possible approaches. Are you overreaching with this wording? I would suggest the following language would be more practical, unbiased, and a fairer representation of what you might want to be saying:

“Training on the proper use of traffic stops is an ongoing and critical part of effective policing. Such training helps insure more tactical uniformity and consistency, as well as mitigate racial bias. Such training should be continuous and reflective of the highest professionalism of community policing and consistent with community policing standards. Such training should include information on the negative impacts of disparate traffic stops particularly for African-American drivers.

3. Page 29 Bullet Two Recommendation:

Again I don’t believe statisticians can identify biases, but they can identify numerical disparities. Therefore I would suggest the following minor change:

.....that they can be aware of trends and traffic stops and examine any **racial disparities that may result from existing training and/or current policing tactics**.

4. Page 29 Bullet Four Recommendation:

I feel just to “*report on progress*” is too vague a parameter for what is needed. Let’s be clear what we are trying to achieve by this annual review. I would suggest the following minor change:

.....regarding traffic stops bi-annually or annually and publicly report **whether progress in reducing traffic stop racial disparities is occurring**.

5. Page 29 Bullets Eight and Nine Recommendations:

I believe it would be a mistake to suggest high fines and unaffordable insurance only affect African-American and Latino drivers when the Task Force is primarily focusing on poverty or low income in these two recommendations. All races of poor people are impacted negatively by high fines and insurance costs compared to people with higher financial means. I would suggest you consider the following minor change to these two recommendations:

replace *African-American and Latino drivers* with ***“low income drivers”***.

6. Page 29 Last Bullet Recommendation:

You suggest the *“Police Department”* should undertake a moratorium on the issuing of citations for cannabis possession. I do not believe that is an appropriate decision to ask the police department to make. The community should make that type of decision and the UPD should support and implement it. Your recommendation also leaves the action hanging in the air because the UPD may choose to do nothing, which I think is their logical choice, especially without first acquiring a city council endorsement on such a volatile topic. I would suggest the following language change:

The City Council should direct the UPD to undertake a moratorium on the issuing of citations for cannabis possession when it is discovered in the course of a traffic stop for one year. The UPD will then report the effects of the moratorium in relationship to violent and property crime data, improved community safety, and how reallocation of police resources and time was used to address other community needs.

7. Page 30 Last Bullet Recommendation:

Just to strengthen and clarify the purpose of the community meetings, I suggest the following:

“The Police Department should assist and participate in a series of meetings with community members to discuss ways to improve police community relations, how to decrease racial disparities in policing practices, and minimize the disparate economic impacts on minorities in Urbana.”

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