

# **Culver City Review of Public Safety Services: Recommendations to Advance Racial Equity and Social Justice**

## **Final Report**

Submitted to the  
Office of the City Manager

and

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# Background

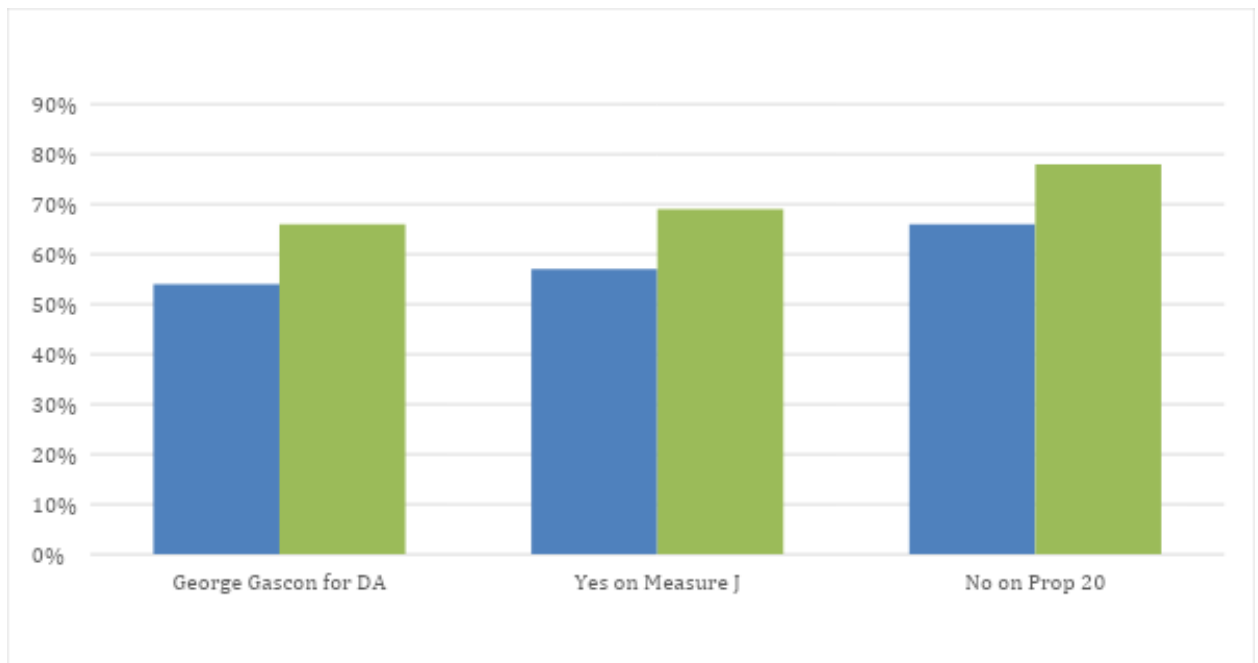
Since July 2020, Solidarity Consulting has served as one of the technical advisors to the City Manager's Office to fulfill the City Council's [mandate to review public safety services](#). Specifically, Solidarity's scope of work was to provide a racial equity and social justice level of review at each phase of the process, facilitate the community engagement process involving a wide array of stakeholders, and make recommendations to address equity and social justice issues related to public safety. These recommendations, which were originally submitted to the City in October 2020, were developed from a synthesis of public testimony, subject matter expertise, community survey responses, insights from city staff and residents serving on commissions, research reports, and focus groups with targeted stakeholders ranging from sworn officers to public housing residents.

At the time of that submission, operational information and data analysis regarding 911 calls, dispatch of police, and aggregated data about traffic citations, arrests, and other crucial dimensions of the public safety infrastructure were still being completed by the police staffing experts, [Center for Public Safety Management](#) (CPSM), also serving as technical advisors to the City. CPSM's data analysis and operational assessment was completed in December 2020, informing additional refinements to these recommendations. Solidarity Consulting would like to acknowledge the Council for taking leadership on centering racial and social justice considerations in this unplanned review of the City's public safety infrastructure and express its appreciation for the confidence in Solidarity's capacity to carry out this level of review.

These actions were all taken as a response to the latest in a long line of social uprisings in U.S. history which have been set into motion by police violence against unarmed Black people. In the Spring and early Summer 2020, as a result of the killing of George Floyd in police custody, U.S. residents of all races mobilized to demand their elected officials identify and address systemic racism in law enforcement, the Courts, and public policymaking. The mobilizations by Culver City residents that prompted the City Council's motion to conduct a review of public safety services and resources were carried out during a pandemic, whose effect and impact has also exposed and exacerbated deep racial inequities and social injustice. Even as Council meetings and business became virtual, robust community participation occurred in meetings anchored by the Council in the Chief's Advisory Panel and jointly with other city commissions, culminating in

an extended Council meeting until 2am and into a second day at the end of the 90-day period designated by Council for the review.

Soon after the submission of the preliminary report in Fall 2020, Culver City residents participated in elections at historic turn-out levels, when 85% of registered voters cast ballots. There were several electoral choices presented to Culver City voters directly related to public safety, decriminalization, and shifting public resources away from law enforcement towards the social safety net. Culver City residents voted with the majority of LA County voters to replace the County District Attorney (Jackie Lacey) with a former police officer/District Attorney, (George Gascón) with a long track record of decriminalization approaches to public safety; to adopt a County Measure to guarantee that a specific percentage of taxpayer funds are allocated to human needs first, including before funding law enforcement services (Measure J); and to reject a Proposition to overturn decriminalization laws, including portions of the previously voter-approved Proposition 47 (which was co-authored by the newly-elected DA), that reclassifies several felonies to misdemeanor status (Proposition 20). Notably, the [Culver City vote](#) exceeded the overall [LA County vote](#) in favor of these changes. As represented in the figure below, the LA County vote (noted in blue) was 54% for Gascón, but 66% in Culver City (noted in green). Similarly, just under 70% of Culver City voters favored Measure J, compared to 57% of LA County voters. And, while Prop 20 was rejected by more than 65% of LA County voters, nearly 80% of Culver City residents voted against the Proposition.



While voters locally were speaking forcefully towards these changes through the ballot box in November, this final report is being submitted to the new Council as the nation is reeling from a January 6, 2021 insurrection to overturn the national vote for President and install the losing candidate. The perpetrators of this violent attack on the U.S. government [carried the Confederate flag](#) into the U.S. Capitol, as they demanded that the Vice President of the United States overturn the results of a Presidential election where [no evidence of fraud](#) was found by Courts or federal agencies responsible for election integrity. The authors of this attack on the seat of American democracy displayed a [range of white supremacist symbols](#) alongside banners and signs proclaiming 'police lives matter.' In carrying out a violent attack on the federal government, they created the conditions for the killing of [4 civilians](#). Two police officers have died, [one by suicide](#) after the breach and the other [due to injuries](#) confronting the mob. At least 50 other police officers were injured, including some who required hospitalization. Law enforcement officers, current and former, have been [charged for their involvement](#) in the violent insurrection. Despite the pro-police, pro-Constitution, and law and order [platitudes of the attackers](#), they [stripped police officers](#) of their weapons and maced them, [beat them](#) with American flags, and pinned an officer between a door and beat him with his baton, almost [crushing](#) him to death.

The perpetrators of the January 6 attack also desecrated the Capitol building, stole and damaged government property, and terrorized the elected representatives of the American people, who were forced to stop their work, take cover, and evacuated from the Capitol. The President-Elect and people around the world [have noted](#) that the majority white crowd engaged in these acts was not met with anything close to the level of State violence or use of force that was deployed against Black people and others calling for justice in George Floyd's murder, nor against Black Lives Matters protestors calling for the divestment from policing and reduction of public safety budgets last summer. In fact, hundreds of those who participated in the violence at the Capitol were allowed to remain at large and the government is now offering rewards to help identify them and bring them to justice. This [contrasts to the images of police violence](#) against peaceful protestors calling for racial justice and of law enforcement agents immediately carrying out hundreds of arrests and charges for various 'crimes' against non-violent protestors last Summer. At the time of the submission of this report, on the Martin Luther King holiday, Congressional legislation, (the [Congressional Oversight of Unjust Policing or COUP Act](#)) has been introduced to investigate the attack on the Capitol and the ties between white supremacists and the Capitol Police, while the House of Representatives has voted to impeach the outgoing President for his role in the insurrection.

In short, the disparities in the exposure to harm from State violence and injustices in the ‘allocation of public safety duties, responsibilities, and resources’ are very much alive six months after the start of this review. However, the events of 2020 and the January 2021 insurrection are connected by a reckoning with the entanglement of American democracy, law enforcement, and racism. There is a national reflection regarding the disregard for human life and dignity and the impunity for racialized violence. Investigations have been launched into the [infiltration of white supremacists in law enforcement](#), among [military personnel](#) and [veterans](#), and the role of police in [right-wing](#) extremism. These developments re-center the question of whether American policing can be dislodged from its origins in slave patrols or its ongoing role in preserving racial hierarchy which has led to mass uprisings and citizen revolts against police brutality and racism.

The stakes could not be higher and the opportunities for action more evident, than they are now, for the elected leaders of Culver City to demonstrate the political will to produce race equity and social justice by addressing [racial disparities](#) in its [policing](#) and the [resource allocation disparities](#) in its budget, documented by UCLA during this review. It is important to recognize the dynamic between the national and the local contexts in the persistence of racial injustice in the United States, and the central role of city and County police forces in ensuring the permanence of racism as an organizing feature of life in a municipality. For centuries, the aspirations to equality embedded in national symbols and federal laws, like the 14<sup>th</sup> Amendment to the US Constitution, have been undermined by the way [white supremacy ideology reconstitutes and reasserts itself](#) in national discourse and in day-to-day life at the local level. Structural racism in local government has historically thrived on the suppression of BIPOC voters and on white racial bloc voting in support of appeals to racism in public policy issues or candidates. This is followed by city and county budget decision-making in service of that racism. It is cemented by well-funded and politically influential law enforcement actors on the decision-making of local entities. In that historical arc, some local Sheriffs and police have also engaged in racialized terror against people of color or people seeking racial justice. That terror includes brutal killings, lynchings, and terrorizing BIPOC residents and allies for change. It also takes the form [of political bullying](#) and engaging in discourse that aligns with the grievances, agendas, and organizations that feed into a national fervor to protect and preserve white supremacy, under the guise of defending police, America, the Constitution, or protecting public safety.

The racial justice question in Culver City has moved beyond examining the ‘use of force’ by individual officers. The central racial justice question is whether the jurisdiction is ready to break with the vexed entanglements of our nation’s history that are embodied in the power relations between police and the decision-making processes of City officials, budgetary allocations, and political life in the City. During this review, for example, the Culver City Police Officers Association (CCPOA) produced a [video](#) demonizing a local association of residents calling for this review and [publicly elected officials](#) in the City. During a low point, the CCPOA published the pictures and salaries of two Culver City residents who are professors at the same university which had published an analysis of CCPD salaries, despite the fact they were not authors of the report, prompting [condemnation](#) about the dangers and chilling effect of such actions. In the public meetings with the Chief’s Advisory Panel and various city commissions, the CCPOA stated that the very inquiry about potential reallocation of duties had demoralized the force, a fact that is directly contradicted by the CPSM report which states CCPD displayed very high morale throughout the operational analysis. Finally, during this review, the Council deemed it necessary to overturn the Police Association’s nomination of one of its members to the City’s Equity & Human Relations Advisory Commission. These [developments](#) occurred after another civic group in the city, People of Color for Change (POC4Change), mobilized to implore the Council to consider that the officer forwarded by CCPOA had cost the city an [\\$8 million dollar settlement](#) for a shooting involving a Black man, delegitimizing an equity-focused city entity. Given the historical arc and contemporary context outlined above, it would run counter to achieving the race equity and social justice imperative of this review, not to acknowledge that these developments took place nor to consider their implication.

Fortunately for the Council and the City, the multi-racial mobilizations to the City Council last Summer, and the overwhelming vote in favor of decriminalization and funding for the safety net last Fall, indicate that the City’s voters are pointing the way towards a more productive, analytically rigorous, and promising engagement of these crucial questions.

# Executive Summary

The Council's mandate to the City Manager -- to examine a potential re-allocation of public safety services, duties, and responsibilities that could serve as a basis for potential reductions to the police budget -- was undertaken after the killing of George Floyd, an unarmed African American man in police custody for allegedly using a counterfeit \$20 bill and ensuing mobilizations by Culver City residents. Specifically, the recorded testimony of residents seeking Council action after Floyd's murder reflects a desire that the City:

- a) acknowledge the systemic racism experienced by communities of color, especially anti-Black racism, and concrete action to end any racial injustices associated with policing;
- b) conduct an assessment of alternatives to law enforcement responses to crisis and community safety that would reduce exposure to violence and other harm;
- c) pursue pathways that shift public funds away from the police budget, up to an aspirational goal of a 50% of the existing \$40+ million CCPD budget, both as a way to accomplish (b) above, and to be invested elsewhere for prevention and alternative responses to public safety needs.

Together, these priorities reflect the desire of many Culver City residents that their elected leaders demonstrate a responsiveness to a broader concern about the amount of public taxpayer money invested in law enforcement, rather than to the social safety net and human needs, especially services that produce community well-being, prevent crime, and promote a deeper sense of public safety. The Council provided broad guidance instructing the City Manager to conduct this review in the spirit of those expectations, with the support of technical advisors, and with robust community input from the Chief's Advisory Panel, various city commissions and entities, labor representatives, and the broader community.

These race equity/social justice recommendations also seek to be responsive to additional concerns and skepticism voiced by people who live, work, or visit Culver City and who have lived



through the 1965, 1992 and 2020 mass uprisings against systemic racism and for police reform in Southern California: that nothing substantive will change, that proposed changes will fail to bring about fundamental changes, and that Black lives, in particular, will continue to be imperiled and diminished by policing practices. These concerns lie in the observation that -- after previous killings of unarmed people of color by police; fires and protests against the failure of the Courts to bring their perpetrators to justice and of policymakers to end State violence; and peaceful citizen mobilizations for meaningful change -- government entities, elected officials, and others with institutional power have resisted change. They have displayed patterns of delaying decision-making until public anger wanes, used bureaucratic mechanisms to stymie fundamental change, or chosen against racial justice pathways using logics about economic efficiencies, tradition, or intractability from other entities.

For this reason, the summary of action steps below delineates a hierarchy of responsibility for action that begins with the Council itself and the leadership of City department heads. This approach counsels against passing the buck to Commissions for further study. Instead, the recommended steps aim to encourage the Council to call the question on its racial justice strategy, charge City departments to develop metrics and deadlines that leaders can hold themselves accountable to, and allow residents to participate in producing concrete, substantive progress. There are three overarching strategies to achieve race equity that constitute this report's recommendations delineated in this Executive Summary, while a set of pathways to reallocate public safety duties and responsibilities are discussed in further detail within the report.

RECOMMENDATIONS FOR ACTION TO ADDRESS RACIAL INEQUITY AND INJUSTICE IN  
CULVER CITY'S PUBLIC SAFETY INFRASTRUCTURE AND ALLOCATION OF PUBLIC  
SAFETY DUTIES AND RESOURCES

1. *The City Council should **adopt 3 pathways to reallocating public safety duties and resources that are most directly tied to existing racial inequities in policing***

**a. Remove Police from Responding to Calls Involving People in Need of Crisis Intervention or Emergency Medical Response**

The public safety review and subsequent electoral results indicate that the highest levels of support for reallocating public safety responsibilities relate to **relieving the police**

**of their role in attending to human needs that they are not trained to address.** The public safety review includes sufficient evidence that the status quo approach of a ‘co-response model,’ (which pairs law enforcement officers with a licensed clinicians) leaves in place the threat of death, deprivation of freedom and civil liberties, and an unsustainable financial burden on city coffers. The public safety review also included sufficient evidence-based, time-tested alternatives functioning in other jurisdictions, called ‘mobile crisis intervention services’ (MCIS) that would not only address a key driver of the over-representation of Black unhoused people in the County jails, but point to a solution to the revolving door of criminalization, jailing, and houselessness that defines the current approach. For people with mental illness (PMI), who constitute 25% of all those killed by police in the US annually, this change is a matter of life and death. Notably, during the review, there was a death resulting from police-community contact in this context in Culver City.

**b. Align City Policies with Decriminalization, Diversion, and Resource Reallocation at the County Level**

During the public safety review, UCLA researchers revealed that the most significant racial disparity that plagues Culver City is that more than 80% of the 18 to 25 year-olds arrested each year are Black and Brown and 65% of them are arrested for misdemeanors. The most immediate, concrete, and achievable step to end this policing-to-prison pipeline would be **to direct the City Attorney to identify how to bring the city’s policing practices in line with County’s decriminalization efforts, how to implement alternatives to arresting people for divertible misdemeanor offenses, and how to stop the use of police as first responders for conduct that should not be prosecuted.**

**c. Remove Police from Traffic Enforcement**

The CPSM work load analysis of the CCPD indicates that (as is the case in the rest of the country) **less than 10% of police time is spent responding to crimes against people or property. Meanwhile, over 40% of CCPD’s time is spent on traffic-related law enforcement. Simultaneously, the arrest statistics specific to the city, and national research on police-community contact between police and people of color, indicate traffic-related interface is a key driver of racial inequities.** It is also a key driver of use of force against unarmed

civilians, including '[Death by Traffic Stop](#).' **The City Attorney and City Manager's Office should be charged with identifying the legal changes, infrastructure needs, and ways to solve any identified obstacles to removing police from traffic enforcement.** Moreover, the Planning Department should be resourced to commission [equity experts](#) designing or implementing models to end the use of publicly financed streets as the central staging area for anti-Black state violence and as gateways to police-community contact that leads to disproportionate BIPOC arrests. Working with the City Attorney's, and City Manager's representatives, these experts should be charged with identifying changes to traffic codes, enforcement protocols, and streetscape design that would serve to implement alternatives to utilizing police to address infractions related to walking, parking, biking, or driving in Culver City.

2. *The City Council should **establish a governance structure to prioritize implementation of the race equity strategy and mechanisms that facilitate robust civic participation through data transparency***

- a. **Configure a Council structure that creates direct oversight for the speed, substance, and implementation of any racial equity recommendations**

Culver City has six months before arriving at the anniversary of the motion adopting this review. The most important step for its elected decision makers to take is **to provide a clear directive and structure to implement selected recommendations it has received from the City Manager's Report, the CPSM final report, this report, or its own integration of this information and current events.** For example, the Council uses a set of mechanisms to signal to the community that its attention is focused on pressing issues that require its supervision. Currently, members are divided into sub-committees, sometimes standing and sometimes temporary (ad-hoc). Some potential ways the Council could elevate the selected race equity commitments to a top-level priority are a) a new ad-hoc committee led by 2 Council members on Reimagining Public Safety or b) elevating them into the existing Equity or Policing Sub-Committees. To illustrate the connection between form and function, if the City adopts recommendations below that involve removing the police entirely from mental health calls and needs the Chief of Police to dismantle the existing MET teams, this could be an appropriate shift to supervise in the Policing Sub-Committee. If the Council adopts a recommendation to ensure the City is

aligning its responses to minor infractions with the County's decriminalization efforts, it may choose to adopt this work in the Equity committee, where it would guide progress by the City Attorney's office on this mandate. It may decide to integrate these in a new subcommittee, instead. Whichever pathway it selects, voters and city staff will be served by a clear directive and direct responsibility at the Council level for moving the City's bureaucracy towards resourcing, supporting, and implementing the work.

**b. Make successful implementation of the race equity strategy part of the annual performance review of City Department leaders.**

Beginning with the City Manager and the City Attorney, the City Council can ensure effective implementation from all City Departments who can support the selected steps to reverse the inequities in policing and resource allocation that are producing racial harm. The Council and these Departments should develop metrics that will be used to measure progress towards those outcomes with a public timeline that residents can use to keep momentum alive. Internally, the most consequential step that City Council could take to show the community that it is serious and committed to moving beyond studying these issues to acting on them, would be **to adopt these metrics as part of the annual performance of all Department heads whose work is implicated in advancing any of the race equity recommendations selected by the Council**. For example, if the code enforcement officers currently dependent on police to accompany them to encampments of unhoused people understand that the Council expects them to help reimagine how they can address those safety concerns with a new non-police approach, the most important element for their success is knowing that the leader of their Department is fully aware, supportive, and accountable to Council for the code enforcement staff to participate in that process. The only way to ensure that there is full alignment and empowerment to act on the vision and achieve outcomes at all levels, is for Departmental leaders to have a written, annual review of the steps they carried out to facilitate shifts and for that the review to have bearing on the assessment of their capacity to lead the Department in a direction called for by the City Council and its voters.

- c. **Release the dispatch data and contract bargaining agreement with the police union and create a Public ‘Crowdsourcing’ Strategy for Racial Equity/Social Justice in Public Safety Services and Budgeting**

In order to increase public literacy about public safety infrastructure and public budgeting, the Council should follow up on the October council meeting instruction to publicly release the underlying dispatch data collected for this review and add the mandate to publish the existing contract bargaining agreement with its police union. This release of information can increase public confidence in the City Council’s capacity to lead the next chapter of Culver City’s racial justice journey and mitigate against any civic fatigue, public skepticism, or cynicism. It can take the first step towards a data transparency strategy designed to support reimagining public safety without the persistence of racialized inequities. **The Council should charge and resource relevant community engagement, public information entities, and technical staff to pursue a civic participation strategy using [crowdsourcing](#) methods that invite the public to use and analyze the data from dispatch information, contract bargaining agreements, and this review** to support the city to achieve its race equity vision. Other cities have used such approaches to [fuse civic activism and technology](#), while other times this participation is decentralized in virtual communities in ‘[CivTech](#)’ (the use of technology to impact society positively), or independently taken up by unaffiliated netizens. These innovations have facilitated public participation in planning, budgeting, and other areas of public policy, including bringing the perpetrators of [racialized violence in the Capitol attack to justice](#).

3. *The council should **make a more rigorous commitment to budgeting and finance strategies** necessary to achieve reallocation of public safety duties and resources*

- a. **Fund a labor force cost analysis of CCPD and potential savings pathways to fund race equity alternatives.**

Remarkably, the 90-day review to examine reallocation of public safety responsibilities and resources, and CPSM’s operational analysis of the CCPD, eschewed any significant consideration of the main cost of policing services: current or future labor expenditures. CPSM indicates that CCPD deploys double the number of officers (3.6) than is normally recommended (1.7) per call for service. Additionally, CPSM notes that only 8% of all calls for service involve crimes against people or property. CPSM indicates it was unable to ascertain how much overtime

the CCPD is spending. To show a good faith effort at addressing the central proposition of the City's residents who called for the review, and prudent fiscal management, the City Council should **commission an external entity to complete a labor force cost analysis and the existing contract bargaining agreement with the police union**. The City Attorney's and Finance Commissions should be charged with outlining strategies to [transform policing through labor relations](#), **drafting the legal and labor relations approaches that can advance pathways to reduce the size of the police**. This includes thorough delineations of standard practices or innovations in human resources and public sector budgeting, such as assessment of upcoming retirements and costs of buy-outs and attrition opportunities.

**b. Commit to 'No-Layoffs' and 'No New Hiring' of CCPD Sworn Personnel**

Pending the more exhaustive review of the labor and employment dimensions that would be produced by the labor force analysis, the Council can ensure good faith commitment to the call for a serious assessment of reallocating public safety duties and resources, by committing to a policy of not hiring new CCPD sworn personnel. At the same time, it can commit to not laying off existing CCPD sworn personnel to demonstrate that the commitment to pursue the goal of reimagining how community safety does not have to derogate the contributions nor the position of the existing force. In doing so, it would be establishing a solid foundation for the next phase of its racial justice journey and for the enterprise of re-envisioning community safety. This approach sends a clear message to all stakeholders that the Council would benefit from good faith contributions from all sides, in a manner that will balance racial equity and respect for labor rights and the well-being of city employees.

# Part One: Race Equity/Social Justice Framework

These recommendations proceed from a historical understanding about how government entities, and civic engagement processes, specifically, fail to construct remedies for racial harm that produce ‘substantive’ equality, rather than ‘formal’ equality. That is, why they produce equality on paper, but not in practice. It is also rooted in Solidarity Consulting’s decades of experience in systems reform work at various levels of government in the Southern California region, with a specific focus on criminal justice reforms that seek to end discrimination against people of color. This report will not be addressing the broader charge under the responsibility of the City Manager -- to review use of force policies nor how to implement President Obama’s 21st century policing recommendations. The focus of this report is specifically on the Council’s directive to identify pathways to reduce the police budget. It seeks to shield Black, Indigenous and People of Color from exposure to structural violence that robs them of feeling safe as residents or visitors to Culver City. To assess the contours of racial harm and social inequity, and potential remedies to them, Solidarity Consulting’s race equity framework employs the following foundational tenets of a structural racism analysis.

## 1. Racism is endemic, not aberrational.

The problem of structural racism in policing is neither exceptional nor dependent on intentional discrimination. The assumption that when racism manifests, it is an unintended departure from, rather than an expression of, settled expectations, cultural norms, or institutional practices is neither borne out by data nor by public testimony during our intensive process. To bring this element into sharp focus, consider the October 1, 2020 meeting of the Chief’s Advisory Panel, when [racial disparities in CCPD police arrests](#) were discussed with community members. These numbers indicate that Black Culver City residents are 8% of the Culver City population but 21% of the city residents arrested by CCPD and that African Americans constitute 37% of all those arrested by the CCPD. When asked to reflect on these disparities, a member of the CAP who is African American, and a Reverend and elder, reported that in his many decades living in the city ‘this has always been the case,’ indicating that he himself has been pulled over by the police and that his young son had also been pulled over and detained by the police. But for his notoriety in the community, he fears that they would be reflected in those arrest numbers. Moreover, he implored the panel and the City to consider why Black men being handcuffed and

stripped of their dignity on the sidewalk is normalized and why these practices have endured over the decades that he has lived in the city.

On the same day that this testimony was shared with the CAP, the Lawyers Committee on Civil Rights [released a study](#) indicating that Black people are disproportionately cited for low-level infractions at the local level. Specifically, the report indicated that across local police jurisdictions, Black people are nearly 10 times more likely to get a ticket than white residents for minor infractions in the public square. Analyzing the most minor municipal offenses and tickets outside of traffic citations, including standing or sleeping outside, owning a dog without a proper license, jaywalking and entering a park after dark - across every city in every region of California - the Lawyers Committee concluded that this disproportionality essentially amounts to 'criminalization of being Black in public.' Similarly, the study found Brown residents (i.e. Mexicans/other Latinx) were 5 times more likely than whites to be ticketed for such infractions and that in, some jurisdictions, like Los Angeles, these minor infractions constitute up to 30% of all tickets issued by police for low-level offenses, not counting traffic related citations. Together, this aggregated data across the State and the testimonials in surveys, focus groups, and CAP meetings, illustrate that a strong racial equity analysis must recognize that racism is endemic, not aberrational.

## 2. Race consciousness is not the same as racial discrimination, and colorblindness is not the same as equal treatment.

One of the enduring features of racial inequity in the United States is the deployment of claims or aspirations to colorblindness -- the idea that people 'don't see' or 'should not see' racial differences -- which has the effect of submerging concrete racial disparities. Being race conscious begins with the recognition that although racial categories themselves are made-up ('socially constructed'), racial hierarchies built on acceptance of these categories do exist. Moreover, due to their long history and purpose to distribute economic and social privileges unevenly in the United States, social relations are often organized around these racial hierarchies. A race conscious approach to this public safety review - and to remedies for harms related to the existing public safety infrastructure - means recognizing that for Black, Indigenous, and People of Color, safety goes beyond the absence of aggravated assaults, robberies, or threats to their persons or property. For them, the definition of 'community safety' also includes 'safety from police violence,'



'safety from racial discrimination when interacting with city officials,' and 'the right to travel through or live in Culver City without the presumption of criminality or fear of negative police interaction.' These desired outcomes are not in conflict with having a common definition of safety in other respects enjoyed by their neighbors, but they do reflect a race-conscious recognition that the burdens from specific failures in the current public safety infrastructure are not borne equally by all residents of the city.

### 3. Ensuring racial equity requires historicizing and contextualizing.

Fashioning racial remedies and social justice approaches that work requires the absolute centrality of 'historicizing' -- searching historical facts that can inform how the legacy of overt racial discrimination against non-white people in a particular place (i.e. Culver City) has shaped the issue being examined over the years (i.e. policing and public budgeting). However, it is not enough to look back in time, it is also critical to 'contextualize;' that is, to examine how the racial disparities in policing fit into existing or contemporary social dynamics related to racial oppression (i.e. racial discrimination in jobs, schools, housing, the Courts, and social relations). One of the duties of public agencies seeking to pursue racial equity and social justice is to recognize that due to the impoverished vocabulary for discussing race, racism, and racial justice in our country -- as well as the active stoking of racial animus by State actors -- residents will need to be supported, encouraged, and challenged to walk towards each other and their history, to change it. If the essential process of accounting for the actual historical experiences of racial animus through public agencies, such as police and city governments, is itself seen as an improper or irrelevant line of inquiry, or if it is isolated to a subset of residents, or if it is allowed to be characterized as an attack on a particular group; then racial justice is not achievable, because one cannot heal, what one cannot diagnose. While it is the prerogative of the City's elected leadership to decide what the scope of these harms have been and what the appropriate remedy for them is, it is an essential element to racial justice that they be named.

The Council's wisdom directing the City Manager to interface with the General Plan Advisory Committee and the Governmental Alliance for Racial Equity, allowed the City Manager's Office to build on important processes already in motion to account for the racialization of the city itself, its police force, and the execution of public safety duties. First, this provided access to the

[City sponsored speakers series](#) that contains multiple scholarly and resident informed examinations of the history of Culver City as a ‘model white city;’ the past direct recruitment of KKK members into the Culver City Police Department by its Chief of Police; and the social history of communities of color who understood that being caught in Culver City after sun-down would mean suffering repercussions at the hands of its public safety infrastructure. These historical antecedents illuminate survey responses and community input during our review indicating that for some people of color today, including some city residents and employees, walking or driving through the City means anticipating being vulnerable to being followed, pulled over, or seen as suspicious by CCPD or the broader community. In some cases, people of color described as ‘common knowledge’ that being non-white in Culver City exposes one to overzealous surveillance or unwarranted police-community contact.

#### **4. Strategies to address racism must be intersectional and multi-disciplinary.**

One of the greatest frustrations for people of color and residents of all races who seek equity and justice in their communities is observing that public entities may only provide a surface solution to racial oppression due to a one-dimensional understanding of the racial harms. Intersectionality refers to a method of analysis and diagnosis that recognizes that race does not operate alone from other aspects of our identities (such as gender, sexual orientation, or residency status). Correspondingly, an intersectional analysis helps to uncover how interlocking systems of oppression act on multiple stigmas to reproduce exclusion and discrimination and undermine social justice remedies. During our review, for example, we learned that together, Black and Latinx residents account for more than 70% of all those arrested by CCPD. However, accounting for the intersection of race, age, and residency, we learned that a staggering 85% of all the people arrested by CCPD are non-residents and that Black or Brown people aged 18-29 who live outside of Culver City make up the vast majority of those cases. This cross-referencing of race, age, and residency reveal a more specific picture of Black and Brown over-representation in the arrests of CCPD. This allows for a deeper examination of critical questions at the core of the review regarding reversing racial disparities in policing and race.

Additionally, intersectional analysis would require considering mental health or disability conditions, and dispatch data that involves these conditions, to examine factors that may produce

disproportionate contact, citations, arrests, or deaths. This would allow public policy makers to fashion a more exacting remedy to any disparities. These solutions would not rely simply on one disciplinary training -- such as psychology or law -- but rather would seek to draw on multiple lenses -- ranging from medicine, social work, and community health, to provide a more effective understanding, and solution, to an issue.

## 5. Ending racial injustice is more likely to be achieved when it is tied to addressing other forms of inequity.

Race has been intimately tied to the distribution of rights, resources, and privileges in the United States, but these rights and privileges have also been tied to oppression based on other dimensions of identity, such as class. As such, remedies to achieve racial equity will not be as effective as they can be without addressing inequities based on other forms of social hierarchy. This public safety review was centered on assessing the use of a finite resource -- public taxpayer dollars -- and exploring a re-allocation of those resources based on principles of equity. Therefore, the review must bring into sharp relief any other inequities in the allocation of public safety dollars and identify remedies that could address them. During this review, for example, the UCLA School of Law's Criminal Justice Program issued a [report analyzing the CCPD's budget](#), specifically a breakdown of annual officer pay. This study indicates that the Chief of Police earns \$231,801 in base salary, but also an additional \$162,741 each year in 'other pay.' The additional pay earned by one person on the force, is more than the annual total pay (salary, overtime, and 'other cash compensation') earned by 44% of all sworn officers. Similarly, the other top 5 sworn CCPD personnel receiving 'other pay,' earn between \$106,000 per year and \$174,000 per year in base salary, and additional 'other pay' starting at \$111,000 to \$133,000 per year. In more than one focus group, we heard repeatedly that the younger, newer members of the force are more likely to be engaged in the community and reflect the diversity of that community, causing some focus group participants to query how city tax money could be aligned more equitably and incentivize achieving racial justice and transformation of public safety services.

## 6. Racial justice is often produced when the remedies for racial harms converge with some other interest of the majority population.

From desegregation of schools to diversification of public and private entities, the 'interest-convergence principle' reveals that, despite the commonly held belief that racial remedies reflect an embrace of racial justice, racial remedies are more likely to be adopted when they can show that they advance a larger interest of the dominant society. Related to public safety, for example, for many years grassroots organizations working for criminal justice reform in California implored policy makers to change policies that led to incarceration and over-reliance on prisons, to no avail. These policies finally took hold only when the State of California faced extreme losses in tax revenue and the need to produce massive budget reductions resulted in adoption of more laws and policies to reduce incarceration and promote rehabilitation. Thus, a realistic approach to the Council's mandate will recognize that racial idealism alone will not sustain any proposals to reallocate public safety services or resources.

This principle can be applied to the fact that Culver City's review of public safety services omitted any serious consideration of the main cost in policing services (staffing), cost projections, or impact on city budgets. The Chief's Advisory Panel had the benefit of having the former elected City Treasurer on its body, who participated in both the CAP meetings and the meeting of the City's Finance Advisory Committee. One of the insights shared by the former City Treasurer regarding UCLA Law's findings about officer pay cited above, was that if the current expenditure levels for the police force continue as is, 'all city services will eventually be impacted.' The current configuration of these labor costs for the CCPD, as cited in the UCLA Law report include:

- CCPD sworn personnel make 2 times as much in total pay than other Culver City employees and 4 times as much in 'Other Pay' than other city employees
- Almost 30% of the CCPD budget for salaries is spent on 'Other Pay/Cash Compensation,' not on base salaries for police officers
- CCPD's total budget is 4 times the budget for the City's park, recreation, and community services, 22X the budget for housing protections/rental assistance and homelessness projects and 144X the budget for after-school programs

Given the short-lived social history of Court-ordered, electoral-based, and public policymaker driven racial remedies, it is essential to surface the potential impact that current allocations of police services, duties, and resources may have on all city services. This is especially crucial at a time where the mass mobilizations to end racial injustices in policing and systemic racism in public and private institutions coincide with a pandemic that may negatively affect revenue streams. From a racial equity perspective, it is important to note that the core resident request in the June/July mobilizations to the City Council was for a rigorous and open dialogue about investments in law enforcement and potential shifts to the social safety net. Without putting these labor costs into the conversation, and the potential impact to the broader Culver City population and the city services that it depends on, transformative racial equity options will be curtailed. This is due to an inability to demonstrate a convergence of the racial justice demands (reducing the reliance on police and shifting funds to meet human needs) with other interests of city residents (preventing deep cuts to a wide range of city services).

## **7. Racial justice strategies must draw on the experiential knowledge, analysis, and narratives of people directly impacted by structural racism to produce successful results.**

Public policy makers seeking to craft remedies to systemic racism can produce more effective results when they affirmatively and consistently generate data, interpretations, and approaches from BIPOC. In a public safety review designed to stamp out racial inequity and promote social justice, it is also imperative to seek out and include the perspectives of individuals within those communities who have directly experienced disproportionate police contact, arrests, jailing, and the from anyone who has experienced the impact of becoming involved in the criminal justice system. The knowledge and analysis that these individuals bring to such processes helps provide a more nuanced diagnosis of practices that produce racial harms and help shape more precise solutions to address them.

In a previous section, the narratives across generations of Black Culver City residents have helped illuminate anti-Black racism documented in an empirical report. Similarly, the only study to [examine racial disparities specific to CCPD](#) during this review was produced by UCLA's Million Dollar Hoods program, which as a methodological practice, produces its reports in partnership with community organizations who help shape research questions, analyze statistics,

and interpret data. In '*Policing Transitional Aged Youth in Culver City: An Analysis of Arrests by CCPD (2016-2018)*,' a second report specific to CCPD produced during the course of the review, UCLA Million Dollar Hoods and its community partner, People of Color for Change ('POC for Change'), revealed that 80% of the 18 to 25 year-olds arrested by CCPD were Black and Brown youth and 65% of those arrests were for misdemeanor crimes, concluding that 'this data suggests that policing Black and Brown adults, largely on misdemeanor charges, is an important driver of both CCPD's total volume of arrests and of racial disparities in CCPD arrests.'

In contrast, CPSM's nearly 200-page report includes no assessment of racial differences in citations, arrests, or other public safety responsibilities. Additionally, due to the short time frame for this review, and despite the agility and meaningful efforts of the City's General Plan Advisory Committee research contractor, the City Manager's survey process and report regarding public safety services indicates that the very population that is most disproportionately arrested by CCPD – young people of color 18 to 25 – had the lowest representation in survey responses and the review. To mitigate this gap, the City Manager's office conducted a focus group with young people who are participating in the city's youth diversion program, capturing unique insights both to police-community contact and how to reimagine public safety. A more robust and focused attempt to elevate such voices could help deepen our collective understanding of the glaring disparity of police-community contact by race reported by UCLA. For example, the arrest data includes addresses of all people arrested by CCPD, facilitating the design and execution of outreach to them by non-police city staff or agencies, to involve those directly impacted by policing arrests. For Black and Brown youth who live outside the city but constitute a large part of the police-community contact and arrests, such strategies would reflect a real effort to address the the issue. As a parallel process, those Black and Brown residents living within the city, of all ages, who make up the city population that has been disproportionately arrested, can affirmatively be sought-out and brought into the reimagining conversation, by entities representing the city's efforts to repair racial harms and reimagine public safety. Together, these strategies can help increase the likelihood that the strategies to address the racial disparities documented in CCPD patterns, practices, and outcomes, are effective.

## Part Two: Pathways to Reallocating Public Safety Responsibilities and Resources

### 1. Remove Police from Responding to Calls Involving People in Need of Crisis Intervention or Emergency Medical Response

During the Public Safety Review, we heard a high level of interest in exploring non-law enforcement responses to mental health, substance use, and calls involving unhoused people. Results from the community survey and focus groups indicate that of all existing police duties, responsibilities, and services, responding to such calls was the most frequently cited duty that Culver City residents believe can use alternatives to a police response. In the “Public Safety Survey Report” commissioned by the City Manager’s office, there is a clear majority opinion given about how mental health and homelessness related calls should be handled. First, 75% of the respondents in the survey agree that if police funding is reallocated, mental health services should be first to receive those funds. More importantly, 74% of agree that sworn police officers should not be the primary respondents to people experiencing homelessness. Similarly, 71% agree that sworn staff do not need to respond to mental health calls. These responses all reflect that, among those sampled through the public safety review survey process, large majorities agree that sworn police officers are not the appropriate responses to these types of calls. Although levels of support for this approach decreased with age, even the generations of people 50 and over show 67% agreement that non-sworn officers should not be the primary responders to mental health calls.

Fiscal and budgetary comparisons presented to the City’s Finance Advisory Committee and the CAP also indicate the city’s current ‘co-response’ approach -- pairing a County-funded psychologist and sworn officers to respond to some of these calls -- is the most expensive way to provide this service. Significantly, several of the race equity and social justice issues at the core of this inquiry converge in these types of emergencies, including the desire to reduce the likelihood of use of force and the desire to roll-back the over-reliance on police to respond to social needs, providing the City with a clear opportunity to fashion solutions that meet short and long-term goals.

#### A. Center Racial Equity in Alternative Approaches to Houselessness

The role of police encounters with the unhoused population is a driver of racial disparities

in arrests and the levels of incarceration, especially of Black people, and continues to be a documented problem in LA County. Grounding the examination of alternatives to law enforcement approaches in our racial justice framework requires a race-conscious consideration of the pipelines to jail which are enmeshed with having police respond to houseless people's needs. A recent UCLA Million Dollar Hoods [study](#) depicts Black people's over-representation in the County jail system, illustrating a sobering picture of that connection:

- Fully 33% of LA County's houseless population is Black, while the total Black population in the County is less than 10%
- Booking houseless African American people in 2019 cost the County more than \$46 million in one year
- The most common charges for the unhoused Black people booked in LA County jail involved six low-level charges amenable to diversion and community-based care

The prospect of reversing this central dimension of anti-Black racism received some momentum when, on his first day in office in December 2020, the County's new District Attorney [issued](#) special directives prohibiting prosecutors from charging low level offenses, abolishing the reliance on bail, and not criminalizing mental health and poverty-related infractions, preferring to work with police to expand social services on contact. The District Attorney grounds these changes both as a racial justice imperative to reverse course on the statistics identified above, but also as a necessary change to the failure of the current approach, which creates a revolving door - from the streets, to the Courts, to the jail and on again. Given that the District Attorney's office has established a commitment to stop criminalizing poverty, mental illness, and substance use disorder, Culver City can take steps to align its practices accordingly.

## B. Interface with Unhoused People using Alternatives to Police

According to CPSM's final report, 'Homeless-Related Calls for Service' to CCPD increased by 49% from 2018 and by an additional 21% from 2018 to 2019, reflecting national trends. An immediate step would be for the City to charge appropriate entities to align city policy and practices with the new [misdemeanor management directives](#) from the LA County District Attorney's Office, which has announced that it will not prosecute trespass and other common charges facing unhoused people.



A streamlined, and values-oriented shift, would be to remove the police from this type of community contact and expand the capacity of the Housing Dept's homeless unit, the Assistant City Manager for Homelessness, code enforcement staff, staff working with public and affordable housing residents and issues, the city's homeless services provider, and any other non-police agencies deemed appropriate, to identify implementation challenges and solutions in alignment with the County's shifts away from law enforcement approaches, towards community based services. An important call for leadership at the Council level would be to instruct its city organs to facilitate a policy change it desires to see implemented and support their work by resourcing relevant partners to collaborate with each other to address obstacles. For example, the code enforcement teams who, according to the CPSM report, rely on the police accompaniment during housing encampments, should be allowed to define what types of de-escalation skills and safety they would like replacements of the police to possess. These city employees can help inform the workforce and resource allocation the City Council should adopt to carry out existing and new contacts through alternative mechanisms.

This reimagining process should also be participatory, and partner city staff with the ecosystem of experts, institutions, and community members committed to well-being and health, as a pathway to community well-being and public safety. In constructing its approach, the City will benefit from considering what communities facing human needs and racial strife in the past have done to solve these inequities in an equitable, creative, and participatory manner. As referenced by one of the City Councilmembers during the June 2020 meetings that led to this review, Culver City residents and leaders can draw from the historical experience of the [Freedom House](#) in Pittsburgh, PA which led to the creation of modern emergency medical services (EMS). This collaboration between medical professionals involved medical staff collaborating with community trainees to address the dismal level of pre-hospital care when society used to rely on police to respond in paddy wagons to transport people to hospitals, often leading to death. For Black residents, this approach led to additional harms related to racial discrimination, when police acting on biases [denied equal service](#) to residents who needed transportation to the hospital. Invoking a social justice approach to developing a solution, doctors trained a cohort of Black residents who were excluded from entire sectors of work due to racial discrimination, over-policing, and discrimination based on criminal records resulting from that discrimination, to become first responders and create modern EMS. Together, they revolutionized medicine, the job prospects of unemployed and excluded people, and pre-hospital transport.

This collaboration is a model of how to partner medical staff and community residents to meet human needs and the need for Culver City to create a participatory process for its residents to plug-into with a mandate to build a system of ‘care, not jails.’ There is also a cautionary tale in the outcome of city involvement in such work that demonstrates why the city must center race equity and social justice in establishing these changes. In the historical example above, the EMS model ended when the city’s racist policy making processes cut funding for the non-profit initiative that launched it and absorbed the model into City services after complaints from the white areas of the city who had not benefited from it. This had the effect of excluding almost all of the Black community members from a new city-run EMS program, and never allowed the Black community to reap the benefits of the innovations they pioneered.

Culver City is poised, with a clear racial equity and social justice framework, to learn from history and recognize the anti-Black contours of current responses to emergencies facing people experiencing houselessness, while responding to the public appetite for innovation to dealing with these human needs. This trajectory begins with a charge to creatively divest from law enforcement responses to them - and instead, emulating the origins of the EMS partnership. The city can invite the many stakeholders who mobilized to Council in Summer 2020 to establish the basis for collaborating with the medical, academic, and community institutions that can generate success. This includes leading hospitals and institutions innovating community health, such as the Venice Family Clinic, as well as in partnership with top public universities in the region. These steps could facilitate implementation of the political will to break the bond between policing and houselessness, mental health, and substance use pipelines to mass incarceration.

### C. End the Use of ‘Co-Response’ MET Teams

The dispatch data analyzed by CPSM also indicates that mental health calls have also increased, by 126% in 2018 and by 10% in 2019, paralleling the rise in ‘homeless-related’ calls. CPSM notes that ‘CCPD employs a co-response model for addressing mental health and homeless-related calls for service. One full time police officer and a civilian mental health clinician from the LA County Mental Health Department are assigned as the Mental Health Evaluation Team (MET).’ CPSM also indicates that some of the original duties assigned to the MET include to 1) conduct unhoused surveys 2) track unhoused contacts 3) respond to complaints about the unhoused. These are now subsumed within the MET team as they work to respond to mental

health-related calls unrelated to the unhoused population. This draws the rest of the city's homeless infrastructure into a police-centered approach and are duties that can be re-deployed. During focus groups, officers described increased time spent attending to houseless people and that often people who are houseless also have co-occurring mental health and substance use needs. Additionally, during this review, an encounter between CCPD and a houseless person carrying a knife tragically led to death. We learned that this encounter fell outside the hours that the police have coverage from the County psychologist on the co-response team.

The need to rigorously examine modalities to respond to these needs without deploying police, is most seriously related to the continued exposure to trauma and death for people experiencing mental health-related distress, due to the fundamental incompatibility of police training to meet this human need. Research on police crisis intervention teams indicates they [have not reduced the risk of mortality or death](#) during police interactions and that people with mental illness (PMI) are involved in 25% of cases where police shootings led to fatalities. During this review, a paradigmatic example of these dangers were highlighted by a case that led to the resignation and dismissal of the Chief of Police and other staff at the highest levels of the Rochester (New York) city government, one of the first cities to adopt police crisis intervention strategies. These officials were implicated in steps before, during, and after the death of Daniel Prude, an African American man under mental health distress who suffocated to death under police custody after his brother called them for help.

The argument for MET is that it reduces officer use of force incidents. This measure of success is centered on the behavior of the police officers and not the emotional well-being of the patient. The net result of MET is still a very high rate of 5150s. In fact, the MET may even instigate 5150s at higher rates than patrol. As the CCPD Chief said in a presentation to the finance committee on 10/24/2020, the MET conducts a majority of the 5150s every year. The MET is only on duty for approximately 23% of all weekly service hours. If it is true that the majority of 5150s are enacted by MET, they are disproportionately putting people on 5150 holds. There are also unexamined/unanswered questions that merit additional analysis:

- What do the following categories of calls, which represent more than 1/3 of the calls for service (14,091), actually refer to (since their categorization is vague): 'disturbance,' 'miscellaneous,' 'pedestrian contacts,' 'suspicious incident,' 'unknown trouble'?

- How many of the 'homeless related' calls cited by CPSM were handled by the MET and what type of calls do these houseless related calls fall into (i.e. disturbance, check area, etc.)?

It is also essential to ask why the presence of a licensed clinician does not reduce but rather increases the chances of having one's civil liberties removed for psychiatric reasons. In turn, we must couple this with the problem of police response to mental health crisis and the issue of race equity. There is the potential that 5150s are being instituted by a licensed clinician due to the BIPOC patient's inability to de-escalate because of police presence. For race equity to be adequately addressed in policing, a non-law enforcement crisis response team is requisite for appropriate, racially-just, trauma-informed mental health assistance. The only way to relieve the stress of police presence during mental health related calls for BIPOC is to remove the police presence.

Financial considerations also argue in favor of this shift. During our review, the Police Chief reported that multiple requests for an additional County psychologist have gone unfulfilled, likely due to the number of the 88 municipalities within the County who may be requesting such support. Irrespective of who would cover the costs of the additional County clinician, we learned the costs of an additional clinician would hover close to \$200,000 after accounting for salary and benefits. In addition, during this review, the City expanded the contract with its current homeless service provider, to provide resources that would allow the non-profit organization to provide mental health support services during the hours that the co-response team is not available.

Given these costs, CPSM's recommendation that an additional team of 1 more Culver City Police officer and a second clinician to cover the remainder of the work week using co-response is not ideal. In addition, CPSM indicates that 'should the department and city opt to provide 7-day coverage around the clock, a four member MET would need to be created; that would mean adding two additional officers and three mental health clinicians.' (CPSM Final Report, p. 57). CPSM only considers the added cost of non-police response. It ignores the cost of police response. If response shifts from police to mobile crisis, police staffing can be reduced. Since police are much more expensive than mobile crisis, this should create net savings, even with a robust mobile crisis system. As described below, it would be much cheaper than expansion of the MET teams, and has proven to end the risks of death and physical harm, reduce

institutionalization, and improve race equity and social justice. CPSM claims such an approach could give rise to liability issues, without citation or other evidence to support that claim, and in the face of existing programs operating in [various forms](#) across the country.

#### D. Adopt Mobile Crisis Intervention Services (MCIS)

During the [public meetings](#) and in presentations to city officials, Culver City was introduced to [CAHOOTS](#), a program which has provided a 24 hour/7 days per week non-police response to 911 calls involving mental health, substance use, and unhoused people operating for more than 30 years in Eugene, Oregon. This program and its costs, along with the larger model of 'mobile crisis intervention services' (MCIS) that it represents, was described various times and in multiple venues to City leaders and the public during the review, by Ben Adam Climer, a former staff member of CAHOOTS. Mr. Climer is now serving as a national expert on its adoption. Through his contributions, we learned that this alternative to police crisis response teams involves deploying a mobile unit, which is staffed with medically trained individuals ranging from EMT, nurses, and health professionals equipped with mental health expertise to respond successfully to these calls. The mobile team is able to assess and respond to the emergency calls because they are equipped with technology that allows them to be on the same frequency as police. The staff of mobile crisis teams can provide medical care that a psychologist and a police response do not provide to human beings in distress. For example, Medicare is now providing a line of reimbursement and revenue for the work of the CAHOOTS program in Eugene, for deviating visits to the hospital by high frequency users by providing wound care, relief from dehydration, and other medical needs that require a medical response in many calls for service. The mobile crisis teams are unarmed and almost all the calls they are involved with do not require police interaction, and when they do, it is police asking for their support, more so than the reverse. In short, the MCIS model is a non-law enforcement response to these human needs, 'co-response' is not.

Mr. Climer, indicated multiple times that in three decades of experience, it was simply not the experience of CAHOOTS that people experiencing mental health or substance use related crises are threatening or dangerous to the unarmed staff. No CAHOOTS staff has been hurt in 31 years of its operation. In addition, the program has been responsible for deviating more than 10% of 911 calls that would otherwise be dispatched to police. A serious non-law enforcement consideration of this model in Culver City would involve inviting code enforcement officers,

housing, and homelessness services staff to work with the non-profit sector experts in MCIS to assess needs in the City and design an appropriate MCIS response.

This model has recently taken effect in [Denver, Colorado](#), where the unarmed response teams have taken on more than 350 calls since June 2020. Portland, Oregon has launched an MCIS model that involves [city staff](#), rather than a non-profit provider in these roles. There is no evidence that the cities of Eugene, Portland or Denver have lost insurance coverage, been exposed to liability, or faced increased premiums by using unarmed response teams to meet the needs of PMI, unhoused people, or other community needs. Despite testimony by the Culver City's insurance broker warning that a shift towards relying on non-police responses to human crisis could threaten the city's municipal insurance and that businesses or homeowners could also lose insurance coverage, [cities](#) and [counties](#) of different sizes are adopting this approach without such effects. Instead, legislation at the federal level [would provide states with funds](#) to support mobile crisis response. Locally, LA County has also begun [developing a framework](#) for this approach, which means forward thinking by Culver City will put the city in a good position to leverage these shifts. An adjacent jurisdiction, the City of Los Angeles, has approved MCIS unanimously. Most importantly, a decision to move forward with this model in Culver City would not only allow the city to provide social services on contact to people in crisis, it would be a concrete step towards reallocating public safety duties and reducing the reliance on police.

## 2. Align Culver City with the County of Los Angeles' Shift to Decriminalization, Diversion, and Resource Reallocation

During the meeting of the General Plan Advisory Committee and the City's Governmental Alliance for Race Equity (GARE) team, and the CAP, the public safety review included a formal presentation of the [LA County Alternatives to Incarceration \(ATI\) Work Plan and Foundational Recommendations](#) adopted by the LA County Board of Supervisors in March 2020. Broadly speaking, this reform constitutes a watershed moment that will impact each of the 88 cities in the County of Los Angeles, by tying County criminal justice and health resources to strategies that move away from treating social infractions as crimes that produce racial disparities in the jail population. The ATI vision is to treat human needs, as such, by creating a decentralized continuum of community-based care. In this respect, the Culver City Council's mandate to examine existing public safety duties and responsibilities and identify potential re-allocations that

achieve equity is an opportunity to put Culver City in a municipal leadership role as a partner to the County, while ending the racial disparities tied to its own policing practices.

#### A. Stop Arresting People for Misdemeanor Crimes Driving Racial Disparities

The most significant shift at the hands of the City at this critical cross-roads would be to adopt the County ATI recommendation to stop arresting people for the two most common misdemeanor charges: driving without a suspended license and petty theft, which are [drivers of racial disparities by CCPD](#). African Americans constitute 44% of these arrests and roughly 35% of these arrests are of Latinx people. These two infractions constitute fully 1 out of 3 arrests made by the CCPD. Not only would this reduce racial disparities, it would meet the larger interest of ensuring that public taxpayer resources are spent on human needs.

Additionally, the ATI calls for a harm reduction approach related to the third most common basis for arrests by CCPD officers: drug possession. Recalling the racial justice framework, it is notable that Whites constitute the largest group arrested by CCPD for drug possession, an area of decriminalization that enjoys wide support, and could help create public awareness of the racial justice impact of treating all three of the most common categories with the same approach, as well as expanding to all divertible offenses. Instructing the City Attorney to work with the LA County Office of Diversion and Re-entry, LA County ATI Office, and County District Attorney to accomplish this shift would demonstrate a good faith effort to achieve racial equity.

#### B. Expand the use of Community-Based Programs that Promote Accountability and Rehabilitation and Use pre-arrest Diversion Programs & Strategies

During our focus groups and the community survey, residents did express concern that community-based supports may not be available to meet the diversion needs. The history of public policy makers using the devolution of mental health services as a way to cut mental health spending, which then never materialized and fueled houselessness, looms large for many and was mentioned by a range of stakeholders, such as the public housing residents, city staff/commissioners, and sworn officers. Rather than seeing these concerns as a reason not to

act, the Council can direct the City Attorney's office to become an active partner to the County and report on the steps needed to align policing practices with the DA's practices calling for [pre-trial release](#), diversion, and presumptions against criminalization. City staff should participate in County efforts related to the Jail Population Reduction, ATI, and Closure of Men's Central Jail. Much of the implementation of this new approach which has been going on for more than one year. A review of the ATI implementation [plan](#) indicates a desire that municipalities partner both with the County and other cities on the Westside to ensure that policymakers at the County and State level resource the expansion of those community-based services diversion services that do not involve the police and restorative justice programs, so that they constitute part of a robust continuum of care in the region.

Similarly, the Council's approach to ensuring that its police and legal infrastructure is aligned with the directives to maximize divertible offenses towards the ATI vision, also calls for addressing the more documented obstacle to diversion, which is not the lack of services, but the failure of officers to [make the referrals](#). The policy shift towards diversion prior to ATI, has been concentrated on youth who commit infractions that could otherwise land them in jail, but the ATI road map indicates a plan to apply it to adults, a move now made more achievable by the DA's new policies.

The Council can design oversight of City actors to ensure that these diversion materialize through a pre-police diversion process. For example, the City Attorney's office should participate in the LA County's Jail Population Reduction work group and Closure of LA County's Men's Central jail processes and actively collaborate with the County DA's office on pursuing a decriminalization agenda. The Council and the City Attorney should provide reports to the public regarding the actions they are taking to align and implement these decriminalization efforts and progress on outcomes to reduce the racial disparities in arrests by CCPD. Similarly, the City Departments responsible for affordable and public housing, services to the unhoused population, code enforcement, and mental illness, and reimagining public safety should be charged with actively participating in and creating implementation plans to adopt the LA County government's Alternatives to Incarceration strategies in Culver City, and reporting these efforts to the public.

During the focus groups and public meetings, there was much praise of the CCPD's decision to voluntarily participate in LA County's existing youth diversion programs (indeed, Culver City was one of only 11 municipalities to participate in this pilot Countywide). Similarly, the



Interim Chief provided his vision for the CCPD's continued commitment to and growth of that program and one of the focus groups involved young people who have benefitted from the services of the non-profit organization running that program. However, there was also a desire for the police department to provide an accounting of how many people have been diverted successfully, what these interventions required of all parties, and the impacts on recidivism or youth crime, where possible. These statistics did not materialize during the public safety review. It would be helpful to generate them, and to also establish a similar set of questions that could provide metrics to show the community what effective harm reduction, diversion, and alternatives to arrest and jails for adults can produce in the lives of individuals and the community as the City moves to adoption of the ATI recommendations. It is also important to begin to put in place procedures that involve not calling on the police in the first place for non-serious infractions, rather than pre-booking diversion controlled by the Police Department. For example, one of the young people in the diversion program described the trauma produced by the militarized response of a police officer once he had already been apprehended for shoplifting by security guards. He wondered what kind of a harm he posed as a small, under-aged person in handcuffs, to provoke the rage and aggression directed at him by a CCPD officer. Moreover, law enforcement officials with experience in the youth detention system have begun to advocate for cooperation from municipalities and the DA's office to [establish protocols](#) that avoid handcuffing, transport in a police vehicle, and booking of young people to prevent a lifetime of recidivism.

Given these shifts, the Council should charge the City Attorney and Manager's Office to work with [justice reform entities in West LA](#), to design a legally-feasible diversion strategy that does not involve police, such as those that have been used by schools to get youth directly to community-based organizations. The City Manager should be charged with exploring on the ways to expand the services provided in the existing youth diversion program for minors to transitional-aged youth (18-25) who commit divertible misdemeanor infractions. The City Attorney and City Manager's Office should identify an inventory of pre-police, non-booking, non-law enforcement led nor assisted diversion models or approaches, and how to address any potential obstacles identified to secure their adoption. From a race equity standpoint, a much broader inquiry regarding the role of School Resource Officers is necessary to buttress CPSM's suggestion to examine their needs and function, including alternatives to police in this role. During this review, LA County [voted to re-imagine youth justice](#), approving a sweeping new approach that will create a new Youth Development Department, shifting the responsibility for system-involved youth from a law enforcement to a human development department. Similarly, the County has erected a new

[Probation Oversight Commission](#) and a new Chief Probation Officer in line with this approach. The incoming POC director and several of the POC commissioners have decades of experience in the area of restorative justice, including programs that create a more direct path [from the schools to community-based organizations](#), rather than police. City officials should be directed to collaborate with the POC Executive Director and Commissioners, the Culver City schools, and the non-profit restorative justice sector, to establish a new set of protocols that handle low level infractions with these approaches. This would reverse Culver City's most significant contribution to racial disparities: misdemeanor arrests of 18 to 25 year-olds, stop the cycle of crime and recidivism, address trauma-rooted causes of crime, and repair harms and heal the community.

### 3. Remove Police from Traffic Enforcement and Ensure that 'Pro-Active' Policing Practices in Culver City are not in conflict with Constitutional Protections

Any public safety review making a legitimate attempt to address the specific racial equity and social justice issues that sparked mass mobilizations this year and in years past must confront the issue of over-policing of people of color. During our review, the City Manager staff referenced work in other jurisdictions that have begun to explore ways to shift the responsibility of enforcing traffic infractions without a reliance on police to reduce police-community contact. In the neighboring City of Los Angeles, the Council [voted unanimously to remove police](#) from traffic enforcement, and is exploring what the Department of Transportation would need to absorb these roles. Meanwhile, the City of Berkeley has [already adopted a plan](#) that begins to move towards traffic enforcement without police. In a few of these discussions, we were reminded by the Interim Chief that there are legal questions regarding what is legally allowable in terms of non-sworn officers having community contact and what is mandated by law as a police duty. Fortunately, legal scholars have begun to articulate a [framework](#) to establish how to enforce traffic laws with staff whom are not police. According to that scholarship there is empirical evidence that traffic stops are the gateway for Black and Latinx people to become criminal justice system-involved, that this is the most frequent type of community-police contact, and that there are identifiable racial disparities in the escalation of traffic stops to more serious - sometimes deadly interactions.

The workload analysis provided in CPSM's final report indicates that 'officers were involved in 41,090 calls, during the 12-month study period, an average of 112.6 calls per day or

4.7 per hour. The top five categories of calls accounted for 83% of all calls: **43% of calls were traffic activities...(emphasis added)** [CPSM, p. 31]). Of these type of calls, 11,340 are 'traffic enforcement,' calls, 4,579 are 'parking/traffic related' calls, and 1,811 are 'accidents.' These numbers have significant resonance from a race equity perspective because on several occasions during our public safety review, public comments were offered suggesting that if Black and Brown people were arrested in disparate numbers, it was simply a reflection of who might be engaged in the commission of crimes. The UCLA reports cited above provide a detailed contrast to that perception and the dispatch data in CPSM's report puts the disproportionate arrest numbers in a broader context. Citations for 'driving with a suspended license,' which in turn lead to the misdemeanor arrest disparities, reflect a [vicious dragnet facing poor and BIPOC people](#). One study showed that drivers license suspensions are up to [5 times higher](#) in Black and Brown neighborhoods, than they are in white neighborhoods. While people of color are being disproportionately arrested for misdemeanors, such as driving on a suspended license, during police activities that occupy more than one-third of CCPD's workload, there is a much smaller percentage of police calls on a day to day basis involving calls for crimes against people (2%) or against property (6%). A clear racial justice impact is achievable by removing major source of police-community contact.

In addition, perceptions about police in communities of color are shaped significantly by this area of police duties. During our focus groups, many of the participants of color saw removal of police officers from the role of enforcing traffic laws as the single most significant change the City Council could make and openly questioned the notion that keeping them in this role and collecting data about race would lead to significant change. Other participants of color felt that the egregious examples of death and violence against people of color, especially Black people, and police, arising out of traffic stops had disqualified the police from this function. Additionally, some wondered what the societal benefit of investing millions in police salaries to address traffic issues ranging from a broken tail light to making a rolling stop could justify the risk of death, jailing, and burden of fines and fees that are disproportionately levied against the poor and people of color.

One of the responses to these questions revolves around a collective assumption that Culver City residents want the CCPD to engage in 'pro-active policing' practices, which includes roles in traffic enforcement as a way to deter crime. Indeed, the City Manager's final report codifies this expression, because it reflects a description that was widely and openly used in the public meetings by some community members and some officers. This description obscures the central

race equity issue with these practices which is that minor infractions are used as a pretext to stop people deemed suspicious, even when similar infractions by other drivers would be ignored. Despite its use, it is not clear what exactly constitutes 'pro-active' policing in Culver City and it is strongly recommended that City officials ascertain it, since some such practices, as applied, can be deemed unconstitutional, such as New York's infamous stop-and-frisk program halted by the Courts. Studies by the National Academy of Sciences explain that proactive policing practices are associated with racial bias, in part, because they allow for enforcement-oriented, uninvited, and increased discretionary police-community contact that shares elements with areas that have high risk factors for bias.

The description from some communities of color (residents, non-residents, and staff) indicated that they brace themselves for driving in Culver City for potential stops because their lived experience indicates that these practices may involve police seeing people of color as suspects and finding a traffic infraction for which to pull them over. Removing police from traffic stops would remove the need for such an inquiry, including the need for resources to ensure that these 'pro-active' policing practices in relation to traffic stops, are aligned with constitutional (i.e. non-discriminatory) policing practices.

# Conclusion

The recommendations for racial equity and social justice pathways in this final report seek to build on the affirmative steps presented to the Culver City Council in the Fall, for reallocation of public safety duties, responsibilities and services that achieve the goals sought by city residents and city leaders after the killing of George Floyd. Considering the racial justice pathways to broaden the strategies used in Culver City to respond to crisis and to produce community safety with alternatives to law enforcement would reflect the Council's commitment to the pursuit of justice that animated this public safety review. Doing so would also constitute meeting the national moment of reflection and to repair racial harm by disentangling policing, budgeting, and racial oppression.