

Dear Alderwoman Schweitzer and members of the Public Infrastructure and Utilities Committee,

We write to you today in support of the proposed legislation to reauthorize automated enforcement and create a fund for the proceeds from this effort, as represented by Board Bills 105 and 106. We have a few clarifications that we request you consider in Board Bill 105, and some substantive changes that we believe are necessary for Board Bill 106 to be effective in its aims, which we outline in this letter.

Regarding Board Bill 105, which authorizes automated enforcement

Clarifying limits to costs for administration of the automated enforcement program

Board Bill 105 does an excellent job of laying out how funds from this program will be managed, and limiting the incentive for the vendor and the city to rely on these funds in the long-term. Ultimately, we would like to see a system that generates *no* fine revenue — as that would be a future where our streets have been redesigned so that everyone drives safely at all times. In the interim, we expect that BB105 might address reasonable expectations for administrative costs of the program that SLMPD might incur, ensuring that the program is run efficiently and the funds that are collected are reinvested into communities to the greatest extent possible.

Ensuring accountability

While the legislation outlines a system of review by the Board of Aldermen and staff from the City of St. Louis, we want to be sure there is accountability built into this program. Accountability would ensure that reporting is transparent, highlighting successes and challenges with the program. It would also ensure there are options to allow the City to adjust the operations of the program and location of the cameras based on the results and transparent, data-driven processes. We expect that decisions both ensure that ticketing does not exacerbate existing racial disparities *and* that dangerous locations are addressed. We currently expect that the annual assessment will be closely reviewed by representatives of the Board of Aldermen as well as City staff to ensure that the program is operating as expected. We'd also like to see this reporting shared back to the public, and for there to be a clear mechanism for the public to report challenges with the program, which can be assessed as one of several forms of input about the program's performance.

Funding public awareness

While public awareness is explicitly listed within this bill, funding for the important step of letting the public know why this program is being reauthorized over other traffic safety methods, how it works, and how their privacy is protected is not outlined. We are also not confident that SLMPD is the right entity to be informing the public about this new program, as they do not consistently have the public's trust. We urge you to consider what other entities might be better positioned, particularly during the initiation of cameras, to inform the public and address concerns.

Regarding Board Bill 106, which establishes the Neighborhood Traffic Safety Improvement Fund

Directing funds towards best practices that improve safety

While the intention to direct funds collected from automated enforcement towards on-the-ground improvements is admirable, the current list included in Board Bill 106 is inappropriate and potentially harmful. For example, authorizing funding for painting crosswalks, but not adding more robust street crossing protection such as raised crosswalks and bumpouts, or accessible

curb cuts, does not benefit people walking in St. Louis. Likewise, there are a wide range of possible applications of improvements like roundabouts, [some of which are dangerous to cyclists](#). Dedicating the funding to things like speed limit signs, which should be provided for in regular maintenance funds, also has the potential to set up a reliance on these funds in the long-term, when in fact we should all hope that the amount of money collected via automated enforcement decreases over time.

Rather than the list currently included in BB106, we strongly recommend utilizing tested best practices and/or established plans as the reference point for funding. This could include examples like the [Federal Highway Administration's Proven Safety Countermeasures](#) or the City of St. Louis's [Americans with Disabilities Act \(ADA\) Transition Plan](#), addressing our great need for accessible sidewalks, crosswalks, curb cuts, and other infrastructure.

Clarifying potential education funding and increasing public awareness

We strongly support funds being available to support education. However, BB106 currently points only towards a specific and narrow drivers education program that is not yet in place. There are many other types of education that could benefit St. Louis residents, and we would like to see this funding available to other critical education efforts, including public information campaigns on new infrastructure and policies and education that expands the use of bicycles and other non-automobile transportation. We also expect to see this funding utilized in a way that reflects best practices, includes an evaluation of outcomes, and reaches people across the city to address the critical public health crisis that reckless driving causes.

In addition, this funding is an opportunity to intentionally and thoughtfully increase public awareness of the crisis of reckless driving, and why improvements are needed: both in our infrastructure and by adding these new approaches to enforcement. This could help support public awareness of the program, as outlined in Board Bill 105.

Directing funds towards the areas where tickets are issued

Finally, we would like to see the Neighborhood Traffic Safety Improvement Funds directed more specifically to the areas where fines have been issued, as these locations represent places that have been identified as dangerous traffic locations. The bill currently does not specify any locations, but we hope that these resources can be used to improve the conditions on St. Louis's roads, so we ultimately have less need for these cameras or any enforcement.

Thank you for your consideration,

Voting Members of the Community Mobility Committee

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Judith Arnold
Liz Kramer, co-chair
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Christie Holland, co-chair
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***CC: Alderman Shane Cohn
Grace Kyung***