

Agenda Bill AB25-126

Meeting Date: December 15, 2025

Agenda Item: Consent VII.F

⊠ Regular Business Meeting
□ Workshop/Study Session
□ Special Business Meeting

Submitted By: Jodi Adams, Finance Director Date Submitted: 12/10/25

Department: Finance Contact Phone: 360-379-4403

SUBJECT: Resolution 25-034 Adopting Fees for the Staff Time Associated with Redacting Port Townsend Police Department Body Worn Camera Footage Requested Pursuant to Public Records Act Requests

CATEGORY:				BUDGET IMPACT:
	Consent	\boxtimes	Resolution	Expenditure Amount: None
	Staff Report		Ordinance	Included in Budget? Yes \square No \boxtimes
	Contract Approval		Other: Discussion Item	
☐ Public Hearing (Legislative, unless otherwise noted)				
□ 3-Year Strategic Plan: N/A				
Cost Allocation Fund: Choose an item.				

SUMMARY STATEMENT: Pursuant to RCW 42.56.240(14)(f), law enforcement agencies are permitted to charge requestors, not exempted under RCW 42.56.240(14)(e), the reasonable costs of redacting videos prior to disclosure. Individuals who are not subject to fees for redacted videos are listed under the introduction section of the attached Body Worn Camera Redaction Policy.

RCW42.56.240(14)

A video requested through the Public Records Act is redacted (faces and identifying items blurred or boxed out) when it is publicly released and contains information that is generally offensive to the public or contains a situation where an individual has a reasonable expectation of privacy - these instances are largely governed by State Law (see RCW. 42.56.240(14) for more detail). Generally, this means a video that contains images disclosure of which are presumed to be highly offensive to a reasonable individual to the extent it:

- Contains images of any areas of a medical facility, counseling, or therapeutic program
 office.
- Contains information that meets the definition of protected health information;
- Contains images of the interior of a place of residence where a person has a reasonable expectation of privacy;
- Contains images defined as "intimate," i.e., nudity, partial nudity, sexually explicit content:
- Contains images of an identifiable minor;
- Contains images of a deceased person;
- Contains the identity or communications from a victim or witness of an incident involving domestic violence or sexual assault; or
- Contains images from an incident where a domestic violence or sexual assault victim or witness indicates a desire for non-disclosure of their recorded identity or communications.

This list is not all inclusive but covers the most common redactions of body worn footage.

Port Townsend Police Department (PTPD) redacts video using software which allows placement of a box or blurring of images to hide any identifying marks, including faces, clothes, tattoos, addresses, photos, paperwork, computer screens, names, etc. The redactions are embedded in the video, meaning they cannot be removed. A PTPD employee applies the redactions to ensure that all identifying images/audio are removed. These redacted files will be kept in addition to the original, non-redacted version.

In <u>February 2017</u>, the <u>Seattle Police Department</u> completed a Body Worn Video Redaction Cost Study based on stopwatch style time studies to determine the amount of time it takes to redact body worn camera recordings. They determined the cost per minute of redaction time based on the weighted staff salary costs, a rate of \$0.60 per minute of redaction. This was subsequently updated by the Seattle Police Department in 2024, and their fee is now \$0.80 per minute. Other Washington state cities have similar rates to Seattle, such as the cities of Tukwila (\$0.63/minute of redaction time), Kent (\$0.91/minute of redaction time) and Olympia (\$0.80/minute of redaction time).

Using the Seattle Police Department study methodology, and in compliance with the Public Records Act, the City has determined it is reasonable to charge a rate of \$0.50 per minute of video redaction time to requesters that are not exempt under RCW 42.56.240(14)(e). This was determined using the Port Townsend Police Department's <u>staff salaries</u> to determine the "reasonable cost" for such redactions. This will compensate the city for the actual staff time spent redacting body-worn camera footage, while passing along only reasonable costs to the requester.

Staff recommend that the City of Port Townsend implement a fee that will allow the City to recover the cost of actual staff time incurred by the City for redacting body worn video.

ATTACHMENTS:

- 1. City of Port Townsend Body Worn Video Redaction Policy
- 2. City of Seattle Body Worn Video Redaction Cost Study Narrative

CITY COUNCIL COMMITTEE RECOMMENDATION: The Body Worn Camera Policy was brought to Finance and Budget Committee on October 13, 2025 for discussion and the documents were presented and reviewed by Finance and Budget Committee on December 8, 2025. The Committee recommended that the BWC Policy and Fee be brought to council for review and approval at the December 15, 2025 meeting.

RECOMMENDED ACTION: Move to approve Resolution 25-034 Adopting Fees for the Staff Time Associated with Redacting Port Townsend Police Department Body Worn Camera Footage Requested Pursuant to Public Records Act Requests

-ootage Requested Pursuant to Public Records Act Requests				
ALTERNATIVES:				
⊠ Take No Action	☐ Refer to Committee	⊠ Refer to Staff		
☐ Remove from Conse	nt Agenda □ Waive	Council Rules and app	prove Ordinance	
☐ Other:				



City of Port Townsend Body Worn Camera Redaction Policy December 2025

I. Background

The City of Port Townsend ("City") implemented a Body Worn Camera (BWC) program in 2019. Currently all City police officers are equipped with body cameras. These devices capture recordings that are public records subject to the Washington Public Records Act, Chapter 42.56 RCW (PRA). The PRA allows a law enforcement agency to charge certain requestors for the reasonable costs of redacting BWC videos prior to disclosure. Allowable redaction costs are in addition to copying costs that agencies are legally allowed to charge requestors.

In February 2017, the City of Seattle conducted a study to determine the staff costs of applying redactions to BWC video. The Seattle Police Department (SPD) then conducted a revised BWC redaction cost study in March 2018 to incorporate SPD's experience with applying redactions to BWC videos_over the course of the previous year. The purpose of that revised cost study was to determine reasonable costs for redacting BWC recordings, including determining reasonable estimated redaction charges to provide to requestors.

The City finds that the City of Seattle's cost study is sufficient to develop reasonable costs for BWC redaction fees for the City of Port Townsend. The City further finds that the City of Seattle's redaction process is generally equal to the process used by the City of Port Townsend.

II. Authority to Charge

With the exception of the following requestors, <u>RCW 42.56.240(14)(e)</u> allows an agency to charge a requestor the reasonable costs of redacting, altering, distorting, pixelating, suppressing, or otherwise obscuring any portion of a BWC recording prior to disclosure:

- A person directly involved in an incident recorded by the requested body worn camera recording;
- An attorney representing a person directly involved in an incident recorded by the requested body worn camera recording;
- A person or his or her attorney requests a body worn camera recording relevant to a criminal case involving that person;



- The executive director from either the Washington state commission on African American affairs, Asian Pacific American affairs, or Hispanic affairs; or
- An attorney who represents a person regarding a potential or existing civil cause of
 action involving the denial of civil rights under the federal or state Constitution, or a
 violation of a United States department of justice settlement agreement, provided
 that the recording is relevant to the cause of action and that the attorney has
 explained the relevancy of the recording to the cause of action and specified that he
 or she is seeking relief from redaction costs pursuant to RCW 42.56.250(14)(e)(i).

An agency that charges redaction costs must use redaction technology that provides the least costly commercially available method of redacting body worn camera recordings, to the extent possible and reasonable.

III. Policy Goals and Standards

The City is committed to transparency in governance and the disclosure mandates of the PRA. At the same time, the City recognizes the reality that providing BWC videos in response to public records requests incurs substantial costs and staff time. Because the City waives public records fees when the total amount owed is less than \$2.00 and the fee the City charges for BWC videos is \$0.10 per gigabyte of data, the City, unlike most jurisdictions, generally does not charge to provide BWC videos to requestors.

Recognizing that access to public records is a vital community resource, the City, in charging requestors not exempted from fee charges under RCW 42.56.240(14)(e), aims to recoup reasonable fees to offset the substantial costs that BWC video management, processing, storage, and redaction impose on the City.

To this extent, the City will observe the following standards in charging requestors for BWC video redactions:

- The City will charge for BWC video redactions based on the parameters of the PRA.
- The City will charge only for staff time spent reviewing and applying redactions to BWC videos as described in Section IV of this policy. The City will not charge for other costs, such as the costs of storing BWC video recordings or the costs of redaction technology.
- The City will use redaction technology that most effectively and efficiently meets the administrative and operational needs of the City Police Department.



- In addition to charging for redaction costs, the City will charge requestors the actual cost of copies of BWC recordings as provided by the PRA.
- If the City has already reviewed, redacted, and released a BWC video recording to a requestor, the City will not charge subsequent requestors for the cost of reviewing and redacting the video unless additional or different redactions need to be applied. For example, if Requestor A pays \$10 for a BWC video recording, and the video is reviewed, redacted, and released to Requestor A, Requestor B would not also be charged the \$10 Requestor A paid for review and redaction time of the same video. If different redactions need to be applied because of the identity of Requestor B, however, the City will charge Requestor B for the staff time of reviewing and applying those redactions.
- If the City has already reviewed, redacted and released a BWC video recording to an exempted requestor listed under section II above, to a non-exempted requestor, the City will charge the non-exempted requester the cost it would have incurred for the original redaction.

IV. Calculation of Redaction Costs

The City employee who will primarily be performing BWC video redactions is the Police Clerk. The salary for the Police Clerk currently ranges from \$29.86 to \$33.89 per hour, averaging \$0.53 per minute. This amount does not include benefits paid to the Police Clerk or other overhead costs.

To simplify cost calculations and make payment simpler, the City intends to round down and charge requestors at the rate of \$0.50 per minute of Police Clerk time spent reviewing and redacting BWC videos in response to public records requests. Because this rate does not factor in benefits paid to the Police Clerk, the costs of redaction technology, the cost of BWC video storage, or other overhead costs, it is well below the actual costs the City incurs for redacting BWC videos.

This fee may be amended each year based on actual staff salaries. The City Clerk is authorized to increase or decrease the per minute fee based on actual staff salaries and update the fee schedule accordingly.



V. Types of Redactions

The City currently performs all redactions to BWC videos within the redaction studio module of Axon's evidence.com software. There are several types of redactions that the City routinely applies to BWC videos. These are described in Table 1, below. Depending on the identity of the requestor and the exact circumstances of each individual case, the City may apply some, none, or all of these redaction types to any given BWC video recording.

Table 1: Types of Redactions

Redaction Type	Description	Redaction Illustration
Targeted Video Redaction of Person or Object with or without Targeted Audio Redaction	This blurs or blacks out the face or identifying features of an individual or object	SATE CLUST THE TRANSPORT AND THE STATE OF THE SATE OF
Targeted Audio Redaction Alone	This removes exempt portions of the audio without redaction of related video	
Screen Blur or Blackout	This blurs or blacks out the entire screen for a segment of video containing an exempt image, such as a Mobile Data Terminal (MDT) with exempt screen content, the interior of a place of residence where a person has a reasonable expectation of privacy, the interior of a medical or mental health facility, etc.	REDACTED

VI. Time Studies

The Seattle Police Department performed stopwatch-style time studies to determine the amount of time it takes to redact BWC recordings including how long it takes to fully blur



and remove audio from an entire video, eliminate one minute of video, redact one minute of simple audio, redact one minute of complex audio, redact one minute of simple video, and redact one minute of complex video. The results of this study are reproduced on the following page as Table 2. The City finds that these time studies are generally accurate for City of Port Townsend staff and are accurate for providing reasonable cost estimates to requestors.

Table 2: City of Seattle Time Study Results

Redaction Type	Actual Time	Redaction Time
Targeted Video Redaction with or without Targeted Audio Redaction	1 Minute per individual or object redacted	10 Minutes per individual or object redacted
Targeted Audio Redaction Alone	1 Minute	5 Minutes
Screen Blur or Screen Blackout	1 Minute per segment	1 Minute per segment

VII. Estimating Redaction Costs

Based on the results of the SPD cost study, City of Port Townsend staff will calculate estimated redaction costs at the rates presented in Table 3 below. The City will provide the requestor with a cost estimate based on the figures in Table 3. The quoted estimate will not be binding on the City or requestor, and, depending on the video, actual time spent on review and applying redactions may be longer or shorter than estimated. Prior to releasing the redacted video, City staff will provide the requester with an invoice for the actual cost of providing video.



Table 3: City of Port Townsend BWC Redaction Cost Estimates

Redaction Method	Estimated Cost Per	Minutes to Redact Per	Estimated Cost of
	Minute to Redact	Minute of Raw	Redaction Per Minute
		Footage	of Raw Footage
Targeted	\$0.50 per individual	10 per individual or	\$5.00 per individual or
Video Redaction with or	or object redacted	object redacted	object redacted
without Targeted Audio			
Redaction			
Targeted Audio	\$0.50	5	\$2.50
Redaction Alone			
Screen Blur or Screen	\$0.50	1 per segment	\$0.50/segment
Blackout			

City of Seattle Revised Body Worn Video Redaction Cost Study Narrative

March 2018

Background

SPD has implemented a Body Worn Video (BWV) program. Currently more than 900 SPD officers are equipped with body cameras. They capture recordings that are public records subject to the Washington Public Records Act, Chapt. 42.56 RCW (PRA). The PRA allows a law enforcement agency to charge certain requestors the reasonable costs of redacting BWV videos prior to disclosure. Allowable redaction costs are in addition to copying costs that agencies are legally allowed to charge requestors. SPD conducted an initial body worn video redaction cost study in February 2017. SPD conducted this revised body worn cost study to incorporate SPD's experience with body worn video over the course of the past year. The purpose of this revised cost study is to determine those reasonable costs including determining reasonable estimated redaction charges to provide to requestors.

Introduction

With the exception of the following requestors, the PRA allows an agency to charge a requestor the reasonable costs of redacting, altering, distorting, pixelating, suppressing, or otherwise obscuring any portion of the body worn camera recording prior to disclosure:

- A person directly involved in an incident recorded by the requested body worn camera recording;
- An attorney representing a person directly involved in an incident recorded by the requested body worn camera recording;
- A person or his or her attorney who requests a body worn camera recording relevant to a criminal case involving that person;
- The executive director from either the Washington state commission on African-American affairs, Asian Pacific American affairs, or Hispanic affairs; or
- If relevant to a cause of action, an attorney who represents a person regarding a potential or
 existing civil cause of action involving the denial of civil rights under the federal or state
 Constitution, or a violation of a United States department of justice settlement.

An agency that charges redaction costs must use redaction technology that provides the least costly commercially available method of redacting body worn camera recordings, to the extent possible and reasonable.

Principles

- We charge for redactions based on the parameters provided in the PRA
- We charge staff time directly applicable to redacting videos
- We charge staff time (salary only) for no more than the lowest-paid employee assigned responsibility for redacting video
- We have a highly-skilled Video Specialist who applies her expertise to redact video in an efficient and skillful manner
- We use redaction technology that most effectively and efficiently meets the administrative and operational needs of the Department
- We do not charge requestors any costs related to the redaction technology
- The City incurs substantial costs for video management, processing, storage, and redaction technology
- In addition to allowed redaction costs, we charge requestors the actual cost of copies of BWV recordings as provided in the PRA

Types of Redactions

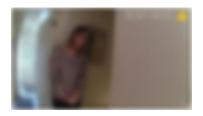
- Targeted Video Redaction of Person or Object with or without Targeted Audio Redaction: This blurs or blacks out the face or identifying features of an individual or object
- Targeted Audio Redaction Alone: This removes exempt portions of the audio without redaction of related video
- Screen Blur or Blackout: This blurs or blacks out the entire screen for a segment of video containing an exempt image, such as a Mobile Data Terminal (MDT) with exempt screen content, the interior of a place of residence where a person has a reasonable expectation of privacy, the interior of a medical or mental health facility, etc.
- The types of video redactions are illustrated in the next section

Video Redaction Type Illustrations

Targeted Video Redaction¹



Screen Blur²



Screen Blackout



¹ The size of the dot or shape obscuring an individual or object may vary to ensure that exempt identifying details are sufficiently obscured.

². Screen blur here is illustrated at 60% blur. The level of blurring may vary to ensure that exempt identifying details are sufficiently obscured

Redaction Process

The cost of redacting video using current technology reflects actual staff time derived from the workflow necessary to apply redactions as detailed in the SPD Redaction Process Workflow, attached to this Cost Study.

Time Studies

Stopwatch style time studies were conducted to determine the amount of time it takes to redact BWV recordings including how long it takes to fully blur and remove audio from an entire video, eliminate one minute of video, redact one minute of simple audio, redact one minute of complex audio, redact one minute of simple video, and redact one minute of complex video.

Time Study Results:

Redaction Type	Actual Time	Redaction Time
Targeted Video Redaction with or	1 Minute per individual or	10 Minutes per individual or
without Targeted Audio Redaction	object redacted	object redacted
Targeted Audio Redaction Alone	1 Minute	5 Minutes
Screen Blur or Screen Blackout	1 Minute per segment	1 Minute per segment

Video Specialist Salary

The salary for the Video Specialist in the SPD Public Disclosure Unit is approximately \$.60 per minute. This amount does not include benefits paid to the Video Specialist or other overhead costs. The PRA allows agencies to charge the actual cost of redacting BWV recordings including the cost of redaction technology provided it is the least costly commercially available method. The Video Specialist's salary amount does not include the cost of redaction technology and the City does not intend to charge requestors technology costs at this time. The City intends to charge requestors at the rate of \$.60 per minute of Video Specialist time to redact body worn videos. This rate is below the actual cost incurred by the City for redacting video.

Estimating Redaction Costs

Based on the results of the cost study, SPD Public Disclosure Unit staff will calculate estimated redaction costs at the following rates:

Redaction Method	Estimated Cost Per	Minutes to Redact Per	Estimated Cost of Redaction
	Minute to Redact	Minute of Raw Footage	Per Minute of Raw Footage
Targeted Video	\$0.60 per	10 per individual or	\$6.00 per individual or
Redaction with or	individual or object	object redacted	object redacted
without Targeted	redacted		
Audio Redaction			
Targeted Audio	\$0.60	5	\$3.00
Redaction Alone			
Screen Blur or Screen	\$0.60	1 Minute per segment	\$0.60/segment
Blackout			

SPD Will Charge Redaction Costs Based on Actual Redaction Time

The City will charge requestors redaction costs reflecting the actual time it takes to redact a particular video calculated at the rate of \$0.60 per minute.

RESOLUTION NO. 25-034

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PORT TOWNSEND ADOPTING FEES FOR THE STAFF TIME ASSOCIATED WITH REDACTING PORT TOWNSEND POLICE DEPARTMENT BODY WORN CAMERA FOOTAGE REQUESTED PURSUANT TO PUBLIC RECORDS ACT REQUESTS

- WHEREAS, the Port Townsend Police Department implemented a Body Worn Camera Program in 2019; and
- WHEREAS, body worn camera recordings are public records subject to Chapter 42.56 RCW, the Washington State Public Records Act; and
- WHEREAS, pursuant to RCW 42.56.240(14)(f), law enforcement agencies are permitted to charge requestors not exempted under RCW 42.56.240(14)(e) the reasonable costs of redacting videos prior to disclosure; and
- WHEREAS, the City of Port Townsend analyzed a 2017 Body Worn Video Redaction Cost Study completed by the Seattle Police Department, which determined the amount of time it takes to redact such footage, and multiplied that amount of time by the Police Clerk's staff salaries to determine the "reasonable cost" for such redactions; and
- WHEREAS, the City Council wishes to adopt a Port Townsend Police Department fee that will allow the City to recover the cost of actual staff time incurred by the City for redacting body worn camera recordings;
- **NOW, THEREFORE,** the City Council of the City of Port Townsend do hereby resolve as follows:
- Section 1. Police Department Fee Schedule. The Port Townsend Police Department will charge requestors not exempted under RCW 42.56.240(14)(e) for the actual staff time cost incurred for redacting body worn camera footage at the rate of \$0.50 per minute. This fee will be amended each year based on actual staff salaries. The City Clerk is authorized to increase or decrease the per minute fee based on actual staff salaries and update the fee schedule.
- Section 2. Effective Date. This resolution and the fee schedule contained herein shall be effective as of January 1, 2026.
- **ADOPTED** by the City Council of the City of Port Townsend at a regular meeting this 15th day of December, 2025.

	David Faber, Mayor
Attest:	Approved as to form:
Alyssa Rodrigues	Alexandra Kenyon
City Clerk	City Attorney