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**Sent:** Tuesday, February 28, 2023 5:22 PM  
**To:** Tony Viramontes <[Tony.Viramontes@longbeach.gov](mailto:Tony.Viramontes@longbeach.gov)>  
**Subject:** Public Comment - Agenda Items 2 & 3 - EHRC 3/1 Meeting

**-EXTERNAL-**

Dear Tony,  
I'm enclosing below my public comment for tomorrow's EHRC meeting agenda item #2 and #3 as my remarks cover both agenda items. I hope you will be able to post this public comment before the tomorrow's meeting. I appreciate your assistance!

Best wishes,  
Parisa Vinzant

**Public Comment for EHRC's 3/1/23 Meeting Agenda items #2 & #3**

Good evening Commissioners. My name is Parisa Vinzant and until I resigned last week, I'd served for five years as a Technology and Innovation Commissioner. I'm submitting a combined public comment for agenda items 2 and 3 because they are related to EHRC's letter with recommendations on anti-surveillance and FRT that commissioners will be discussing as part those two agenda items tonight.

Please note that since no member of EHRC was present for the Technology and Innovation Commission's (TIC) 12/21/22 meeting where discussion took place of the transmittal of these two commissions' work on FRT and surveillance technology to City Council, I'm sharing in my personal capacity an update below as well as the [remarks](#) that I made on agenda item #2, which I think provide necessary context to inform your meeting.

Please note that after my remarks and public comments from two community members and a brief discussion amongst TIC, the outcome of agenda item 2 was that TIC unanimously voted requesting commission staff to work with the City Manager's office to ensure that EHRC's entire letter was included as an attachment and not just as a hyperlink and then requested that the revised TFF memo be re-emailed to the newly elected mayor and City Council. On 12/23/22, TIC was notified by commission staff that the TFF memo was revised to include the EHRC recommendations as an attachment and was redistributed and also reposted, which can be found [here](#).

In case there is any issue with viewing the transcript of my remarks from the above link, I'm enclosing my full remarks below:

**Transcript of Verbal Remarks by Commissioner Parisa Vinzant on [Agenda Item 2](#)  
Technology and Innovation Commission Meeting, 12/21/22**

I have quite a number of concerns I wanted to raise here about the TFF memo. So, because we have two newer commissioners on this commission and we have two in the wings who are here on this call, I thought I'd just briefly say that I've been a commissioner for five years. And I want to make sure that the remarks that I'll make on agenda item 2 pertain to my role and work as a commissioner and *I do not attempt to speak for this commission as a whole. These remarks reflect my own views.* I will briefly preview where I'm going: I am very concerned about how the Equity and Human Relation Commission's

letter is being minimized in the [TFF memo](#), and I am deeply concerned about how both our commission's and EHRC's recommendations how they are being represented in the section of the memo entitled, Additional Analysis by City Staff.

But first, as brief context, as I said since we have two new commissioners and two waiting in the wings, our commission was asked in January 2021 to support the Mayor and City Council approved Racial Equity and Reconciliation Initiative related to Goal 3, Strategy 3E of the Framework's action on Facial Recognition Technology. Over a period of a year and a half, we took this work very seriously and worked very hard on it, which the community came out time and time again to share their concerns, but as our work got bogged down and delayed, they began to lose faith in us and in the process.

Even our best efforts could not completely create equity in outcomes because we had equity gaps in process, largely due to administrative interference designed to slow us down, which I believe were efforts directed from the top down by the City Manager. For example, one glaring gap in the process was the lack of formal presentations to our commission from a civil rights or human rights organization, an expert view that was disallowed by the chair and TI director due to perceived lack of neutrality. While a chair has a good deal of discretion on choice of presenters, in this case, it was in lockstep with the city position. And because we as a commission were administratively locked into a series of three consecutive study sessions during August and September 2021—and per Long Beach's interpretation of study sessions under the Brown Act no action or voting can occur—TIC was unable to immediately vote or take another action. But, by unanimous vote at our October 2021 meeting we began to address these equity concerns when the TIC requested that the Equity and Human Relations Commission apply a racial equity analysis or lens to our work and recommendations on FRT. I want to acknowledge that this work is very complex, so I'm proud of our commission for working together through our differences and coming together in that clear, unanimous way to bring the EHRC with their unique expertise into this process to support this vitally important work that's supportive of the Racial Equity and Reconciliation Initiative. And I would say a similar kind of working through differences and compromise resulted in our white paper with three key recommendations, which the EHRC applied a racial equity lens to.

And the EHRC researched the issue, they held public meetings, and received formal presentations from Just Futures Law, a civil rights organization that works with immigrant and racial justice organizers, and from the ACLU, a prominent civil rights and civil liberties organization. EHRC spent six months of effort and time working hard, and so many community members came to share their concerns and expertise, which resulted in a letter with recommendations.

I'm very disappointed and concerned to see how the City Manager has chosen to present the EHRC's letter of recommendations: rather than as an attachment as our white paper has been and thus on equal footing, he has chosen instead to merely hyperlink to EHRC's letter with recommendations and pull out the four core recommendations from their 6-page long letter. Further, you may be wondering like I was where the ACLU letter came from that's addressed to the EHRC chair but that's included as an attachment in the TFF memo. It originally was included as an attachment to the 6-page EHRC letter with recommendations. So, let's be clear, the City Manager chose to separate the 6-page EHRC letter but only include the ACLU letter as an attachment into the TFF memo and NOT the EHRC letter. If this was merely a mistake, then the City Manager could have fixed the identified issue earlier this week when he had to fix the issue of having hyperlinked to an outdated draft of an EHRC letter. He chose not to. The question is why—and why is he so unwilling to fully be transparent and fair in how he transmits BOTH commissions' communications in their totality?

From September of this year, the date of [EHRC's final letter with amended recommendations](#), it took the City Manager over three months to finally transmit the TFF memo, although as a note, he had our commission's white paper and the initial recommendations from the EHRC as of June 2022. Yet, he sat on our collective recommendations, and waited to transmit the TFF memo until around late afternoon on Friday, December 16th, which allowed the outgoing Mayor and City Council just one full business day and *no* city council meeting day to act. This kind of delay tactic reeks of administrative interference. And I'm glad to hear from Lea's update that the City Manager does intend to transmit the revised TFF Memo to City Council and I'll be re-asking for a definite date for when this happens. It should not be on the City Council and the Mayor to check for when new TFFs are updated, it should come straight from the City Manager.

Beyond the questionable timing of the memo transmittal, I'm very concerned that the collective work of our two commissions is being undermined because of how the City Manager argues that the Mayor and City Council *dismiss* our recommendations related to moratoriums and/or bans on FRT, ALPR and related biometric technologies, the last two of which EHRC had recommended. As City Manager, it may be his prerogative to take any stance he wishes, but does he not also have a duty to present the findings and recommendations fairly and accurately from the TIC and EHRC to the elected bodies that these two commissions provide advisory support to? The words of a City Manager carry tremendous weight and can have a chilling effect and possibly even dissuade action on our recommendations. So, an act of good faith here by the City Manager would be in my opinion: 1) to revise the TFF memo so that the EHRC letter is included as an attachment just like the TIC white paper is included as an attachment; and 2) resend this newly revised TFF memo to ensure that the newly elected Mayor and City Council receive it.

And to close, both commissions worked extremely hard and acted in good faith to produce this collective research and recommendations on FRT and surveillance technologies. A broad and diverse number of community members gave up their precious time to share their expertise and concerns at both commissions. This work and recommendations deserve to be fairly and accurately communicated with the newly elected Mayor and City Council. To do so can help demonstrate to Long Beach residents that the city government ["operates equitably, ethically, and that works to promote and preserve public trust and confidence"](#) (that comes from the City's new Ethics policy). I call on the new Mayor and City Council to act on the recommendations by both commissions, but with special consideration and urgency given to those as advocated by the Equity and Human Relations Commission. Thank you for your consideration of these remarks and time that you've allowed to give them. I look forward to all of your remarks as well. Thank you.