



Surveillance Impact Report

San Francisco Public Utilities Commission (SFPUC)

Security Cameras

As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology ("COIT") and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department's use of surveillance cameras.

DESCRIPTION OF THE TECHNOLOGY

The San Francisco Public Utilities Commission (SFPUC) aims to provide our customers with high quality, efficient and reliable water, power, and sewer services in a manner that is inclusive of environmental and community interests, and that sustains the resources entrusted to our care.

Security Cameras are used to deter malicious behavior, capture potential or actual malicious behavior by or against SFPUC facilities, employees, or personnel working on behalf of SFPUC. Provide evidence to support incident investigations. Provide real-time monitoring of operations and critical equipment at SFPUC facilities. Support SFPUC health and safety requirements and objectives. Monitor wildlife/game, vegetation, and water flow management.

In line with its mission, the Department shall use security cameras only for the following authorized purposes:

Authorized Use(s):

1. Live monitoring.
2. Recording of video and images in the event of an incident.
3. Reviewing camera footage.
4. Providing video footage/images to law enforcement or other authorized persons following an incident.

Prohibited use cases include any uses not stated in the Authorized Use Case section.

Further, processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, gender, gender identity, disability status, or an individual person's sex life or sexual orientation, and the processing of genetic data and/or biometric data for the purpose of uniquely identifying an individual person shall be prohibited.

Department technology may be deployed in the following locations, based on use case:

SFPUC surveillance cameras are located in public areas of SFPUC facilities. Additional cameras are used to monitor wildlife/game, vegetation, and water flow management in exterior areas of SFPUC facilities.

Surveillance Oversight Review Dates

COIT Review: March 18, 2021

Board of Supervisors Review: August 4, 2021

Technology Details

The following is a product description:

Axis offers a wide portfolio of IP-based products and solutions for security and video surveillance. Our security cameras, video encoders, accessories and access control products are based on open industry standards. The products integrate easily with Axis' video management software, or with a partner product, to build a complete security or surveillance solution.

A. How It Works

The technology's primary functions are to provide live views and record video footage to a dedicated, secure server. The system is comprised of multiple cameras connected by data cables and infrastructure to the server. The footage is recorded on the server and stored for a maximum of 30 days.

Data collected or processed by security cameras will not be handled or stored by an outside provider or third-party vendor on an ongoing basis. The Department will remain the sole Custodian of Record.

IMPACT ASSESSMENT

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

A. Benefits

The Department's use of security cameras has the following benefits for the residents of the City and County of San Francisco:

- Education
- Community Development

X Health

The technology helps ensure that the City's critical infrastructure can effectively carry out its mission, which would have underlying health consequences for the general public if non-operational.

X Environment

Natural Resources (NRD) utilize the technology to monitor wildlife and vegetation located within SFPUC sites.

X Criminal Justice

The technology is used to capture an event that may or may not include the SFPUC or its facilities, assets, or employees that necessitates action from law enforcement and requires video surveillance for a supporting law enforcement investigation.

Jobs

Housing

X Other

The technology helps ensure that the City's critical infrastructure is in continuous operation, these operations are used to provide high quality, efficient and reliable water, power, and sewer services.

B. Civil Rights Impacts and Safeguards

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

The San Francisco Public Utilities Commission (SFPUC) is committed to addressing potential civil rights/liberties impacts associated with surveillance technology, including but not limited to Critical Infrastructure Cameras (CICs). We implement administrative safeguards such as POL-EPS-001, Security Video Footage Release and Playback Policy that details the purpose of SFPUC security system cameras and video surveillance equipment. This Policy also outlines the circumstances under which this security footage may be accessed. Specifically, the Emergency Planning and Security (EPS) director shall only permit the viewing of supervised security footage playback according to (1) local, state or federal law enforcement involvement or request, (2) SFPUC incident investigation, (3) SFPUC Human Resource Services or Department of Human Resources investigation. EPS shall not entertain or fulfill requests for playback viewing from employees, consultants, contractors, vendors, others acting at the direction of the SFPUC, or members of the public. As such, the CICs cannot be used to monitor anything other than for its intended purpose explained below. This technology is utilized to record a visual representation of events occurring at or around SFPUC facilities, assets, and project sites. Footage is stored for thirty (30) days prior to deletion when it can no longer be recovered. In the event of an incident, Emergency Planning & Security (EPS) maintains the authority to operate, manage, monitor and archive all footage from any SFPUC facility. Playback requests are only permitted according the four (4) use cases previously noted or at the discretion of the SFPUC General Manager, Deputy General Manager, or EPS Director.

All SFPUC Enterprises, Bureaus and staff will adhere to this Policy. The only instance where this policy does not apply is for wildlife/game and go-pro cameras that are rotated at various locations on SFPUC watershed land that is generally accessible to the public and which are used for vegetation and water flow management purposes.

C. Fiscal Analysis of Costs and Benefits

The Department's use of surveillance cameras yields the following business and operations benefits:

Benefit	Description
X Financial Savings	<i>Department Security Camera Systems will save on building or patrol officers. The system is also used to prevent loss through theft or vandalism.</i>
X Time Savings	<i>Department Security Camera Systems will run 24/7, thus eliminating building or patrol officer supervision. The system can also ensure that operational issues are resolved in a timely manner.</i>
X Staff Safety	<i>Security cameras help identify violations of policy and provide assurance that staff safety is emphasized and will be protected at their place of employment. The system is also used to prevent personal injury to staff and ensure compliance with SFPUC health and safety requirements/objectives.</i>
X Data Quality	<i>Security cameras run 24/7/365 so full-time staffing is not required to subsequently review footage of security incidents.</i>

The total fiscal cost, including initial purchase, personnel and other ongoing costs is Number of FTE (new & existing)	.25 FTE	
Classification	0931 – Director of Security & Asset Protection 1054 – Principal IS Business Analyst 1044 – Principal IS Engineer Total expected staff hours: 10 hrs/week \$42,000 total per year for all employees	
	Annual Cost	One-Time Cost
Software	Milestone: \$3,182 Lenel: \$5,000	
Hardware/Equipment	One Camera: \$2,517.00	
Professional Services	\$100,000/yr	
Training	Milestone: \$1,995 Lenel: \$6,000	
Other		
Total Cost	\$160,695 per year	

Below is a breakdown of the cost for SFPUC to retain video data for one year (vs the current policy of 30 days).

- Cloud storage on GCP (committed allocation egress/overages included) – estimate = \$86,365 / month (assumes 2.5PB of storage... yes petabytes...)
- Cloud compute resources on GCP for video archive post-processing (down-sampling, compression, AI+ML computer vision analytics) = \$36,052 / month
- Local storage gateways (x5) to support “drip feed” and staging/tiering of video archive = \$47,083 / month (lease cost)
- Added DIA bandwidth charges to support constant video archive tiering or direct peering with cloud storage provider = \$15,500 / month
- Assume expansion/growth in the costs of these services annually at 15% (additional cameras, higher resolution cameras, new sites, etc.)

Educated guess (and this is a very high level estimate) for SFPUC to retain 12 months of video surveillance data ~ \$2,553,000 (annually)

The Department funds its use and maintenance of the surveillance technology through an Annual Operating Budget.

COMPARISON TO OTHER JURISDICTIONS

Surveillance Camera Technologies like the San Francisco Public Utilities Commission (SFPUC) Surveillance Camera System are currently utilized by other governmental entities for similar purposes.

APPENDIX A: Crime Statistics

Department: Public Utilities Commission

Section 19B requires each department in their Surveillance Impact Report to respond to the following question if applicable, "the general location(s) [of the surveillance technology] may be deployed and crime statistics for any location(s)."

The Public Utilities Commission operates a total of 37 Security Cameras in public areas. Public Utilities Commission locations include public wastewater facilities over seven counties.

The department maintained an internal incident log for 2020:

Category	Number of Incidents	% of Incidents
Assault	2	0.81%
Fire	17	6.88%
Other	73	29.55%
Robbery/theft (or attempted)	18	7.29%
Threat	4	1.62%
Trespassing	67	27.13%
Vandalism	35	14.17%
Vehicle Accident	31	12.55%
Grand Total	247	100%

APPENDIX B: Section 19B Required Questions

1. A description of the product, including vendor and general location of technology.

Product Description: *Axis offers a wide portfolio of IP-based products and solutions for security and video surveillance. Our security cameras, video encoders, accessories and access control products are based on open industry standards. The products integrate easily with Axis' video management software, or with a partner product, to build a complete security or surveillance solution.*

Vendor: *XtechJV*

General Location: *SFPUC surveillance cameras are located in public areas of SFPUC facilities. Additional cameras are used to monitor wildlife/game, vegetation, and water flow management in exterior areas of SFPUC facilities.*

2. The specific categories and titles of individuals who are authorized by the Department to access or use the collected information

Classification & Job Title	Employee Name
<i>0931 – Director of Security and Asset Protection</i>	Jeff Harp

0932 – Emergency Planning Manager	Josh Gale
1844 – Senior Management Assistant	Oscar Miron
1822 – Administrative Analyst	N/A
1820 – Junior Administrative Analyst	Stephanie Marquez
1054 – Principal IS Business Analyst	Marcus Coleman
5291 – Training & Exercise Planner III	Stephanie Murti

3. What procedures will be put in place by which members of the public can register complaints or concerns, or submit questions about the deployment or use of a specific Surveillance Technology, and how the Department will ensure each question and complaint is responded to in a timely manner.

Although there is no public notice given in the form of a physical sign or through a terms of use agreement, we have various communication channels available to ensure that members of the public can register complaints, concerns or submit questions. By emailing info@sfgwater.org, calling our General Inquiries phone number (415) 554-3289, or sending us a letter to 525 Golden Gate Avenue, 10th floor, San Francisco, CA 94102 we shall ensure that all concerns are addressed. Furthermore, the Head of Security and Asset Protection, Jeff Harp shall ensure compliance with the Surveillance Technology Policy by holding an initial and periodic meeting with involved parties regarding the appropriate and inappropriate use of the technology. We will also send staff important updates, deadlines, and reminders on a regular basis. Thus, our detailed policy, noted use-cases, and closed nature of access to the system will promote adherence to technology requirements.

4. Specific details on where data will be stored (local, DT, SaaS, Cloud Storage) including name of vendor and retention period.

Footage is stored for thirty (30) days prior to deletion. In the event of an incident, Emergency Planning & Security (EPS) maintains the authority to operate, manage, monitor and archive all footage from any SFPUC facility. Playback requests are only permitted according the four (4) use cases noted below or at the discretion of the SFPUC General Manager, Deputy General Manager, or EPS Director.

Authorized Use Case #1 *View playback of security footage for local, state or federal law enforcement involvement or request.*

Authorized Use Case #2 *View playback of security footage for SFPUC incident investigation.*

Authorized Use Case #3 *View playback of security footage for SFPUC Human Resource Services or Department of Human Resources investigation.*

Authorized Use Case #4 *Natural Resources (NRD) view playback of footage used for capturing wildlife and vegetation.*