



Surveillance Impact Report

Recreation & Parks Department
Automatic License Plate Reader (ALPR)

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 ALPR.

DESCRIPTION OF THE TECHNOLOGY

The Department's mission is: to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of our diverse community.

In line with its mission, the Department uses ALPR to ALPRs are used to protect the public and our staff in our parks and playgrounds and at special events. In addition, ALPRs are used to protect our critical infrastructure sites.

Recreation and Parks shall use ALPR only for the following authorized purposes:

Authorized Use(s):

1. To support local, state, federal, and regional public safety departments in the identification of vehicles associated with targets of criminal investigations, including investigations of serial crimes
2. To protect the public and our staff at special events from misconduct and/or violent confrontations.
3. To protect critical infrastructure sites from vandalism, theft and damage.

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 is located Poles or facilities where there is a view of park assets (eg. Parking lots, park roads). ALPRs are not located on public streets.

Surveillance Oversight Review Dates

COIT Review: February 4, 2021

Board of Supervisors Review: August 4, 2021

Technology Details

The following is a product description of ALPR

- ARES 2 Line LPR ARES server Exacqvision Video Management System Note: 1. RecPark does not consistently monitor the cameras. RecPark only reviews the video files after an incident has occurred. 2. ALPRs only generate video / image files. The license plate images taken by the ALPRs are not transformed into alphanumeric characters and stored with any related metadata.

A. How It Works

To function, ALPR Automated license plate readers (ALPRs) are high-speed, computer-controlled camera systems. ALPRs automatically capture all license plate numbers that come into view, along with the location, date, and time. ALPRs will be mounted on a pole or on a RecPark facility, and monitor parks, playgrounds, and RecPark facilities.

Data collected or processed by ALPR 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:

- The benefits of the surveillance technology outweigh the costs.
- The Department's Policy safeguards civil liberties and civil rights.
- 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.

B. Benefits

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

- Education
- Community Development
- Health
- Environment

- Criminal Justice Coordination with law enforcement or first responders for all approved requests. Approved requests include criminal activities

such as auto burglaries, personal theft, assaults, robberies, vehicle theft, and vehicle accidents.

- Jobs
- Housing

- Other Public Safety - to protect the public and our staff in our parks and playgrounds and at special events.

C. *Civil Rights Impacts and Safeguards*

The Department has considered the potential impacts and has identified technical, administrative, and physical protections as mitigating measures. Through operationalization of the ALPR Surveillance Policy, the following will be implemented:

1. Administrative Safeguards - All ALPR data will be captured in a request management software solution. Data will include information about ALPR procurement, ALPR attributes, approved requestors of surveillance data, and all requests for Surveillance data. In addition, there will be knowledge articles describing step by step instructions on how to collect and send the data to the requestor.
 2. Technical Safeguards - ALPR Data cannot be accessed unless by an approved requestor, and only for approved requests. Access to ALPR data is limited to 8210 and above management levels in the Park Ranger unit. Violation of the policy will be subject to standard RecPark departmental policies, which may include disciplinary action up to and including termination.
 3. Physical Safeguards - Hardware is secured in the server room, where there is limited physical access. Additionally, there is limited access to the software that stores and retrieves the ALPR data.
- Fiscal Analysis of Costs and Benefits

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

Benefit	Description
<input type="checkbox"/> Financial Savings	
<input type="checkbox"/> Time Savings	
<input checked="" type="checkbox"/> Staff Safety	To protect our staff in our parks and playgrounds, and at special events.
<input type="checkbox"/> Data Quality	

FTE (new & existing)	1 (5% max time - only when requested)	
Classification	8210 - Head Park Ranger	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$5,000	-
Software	-	\$1,000
Hardware/Equipment	-	\$5,000
Professional Services	-	\$1,000
Training	-	-
Other	-	-
Total Cost	\$7,000	

The Department funds its use and maintenance of the surveillance technology through

- Operational funds.

COMPARISON TO OTHER JURISDICTIONS

ALPR are currently utilized by other governmental entities for similar purposes.

APPENDIX A: Mapped Crime Statistics

Poles or facilities where there is a view of park assets (eg. Parking lots, park roads). ALPRs are not located on public streets.