

## **Surveillance Impact Report**

Unmanned aerial vehicles (“UAV” or “Drone” technology)  
Recreation and Parks

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 Unmanned aerial vehicles (“UAV” or “Drone” technology).

### **DESCRIPTION OF THE TECHNOLOGY**

The Department’s mission is to The San Francisco Recreation and Park 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 Unmanned aerial vehicles to support the objective of maintaining city owned properties and landscapes by safely providing detailed photographic data and documentation to assist in the planning of corrective or new construction work by roofers, engineers, electricians, project managers, contract managers, and other personnel. In times of disaster preparedness or post-disaster mitigation, drones will provide critical emergency response functions such as logistical support for emergency routing, life safety, and cleanup efforts, not only assisting in protecting physical assets and public spaces but human life as well.

Drones will support the maintenance efforts of City-owned street trees pursuant to our mission of greening and improving City public spaces.

Recreation and Parks (“Rec and Park”) shall use Unmanned aerial vehicles only for the following authorized purposes:

#### **Authorized Use(s):**

1. Disaster preparedness and response,
2. Environmental monitoring and documentation,
3. Inspect/Survey properties & assets,
4. Project inspection and documentation,
5. Surveying/Mapping data collection

The following use cases are expressly prohibited:

Use of drone technology to intentionally capture images of a personal nature will always be prohibited. No Personally Identifiable Information (“PII”) will be captured.

Department technology is located in neighborhoods, parks, Recreation and Park department owned buildings and facilities.

#### **Technology Details**

The following is a product description of Unmanned aerial vehicles (“UAV” or “Drone” technology)

The department has decided to contract out our UAV services so the equipment will vary from vendor to vendor.

**A. How It Works**

To function, UAV technology incorporates unmanned, remotely-operated aircraft with onboard visual recording equipment, for the purpose of capturing images from an aerial perspective.

Data collected or processed by UAV technology 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:

- A. The benefits of the surveillance technology outweigh the costs.
- B. The Department’s Policy safeguards civil liberties and civil rights.
- C. 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 drones has the following benefits for the residents of the City and County of San Francisco:

- Environment: to inspect trees and other park features
- ~~Other: public safety UAV's can inspect trees and other park features that may a hazard to the public~~
- Fiscal: Using UAVs is a much more cost effective way to obtain overhead footage because it does not require the use of helicopters or lifts.
- ~~Other: public safety UAV's can inspect trees and other park features that may a hazard to the public~~
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**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:

Drone operators/pilots are not authorized to intentionally capture data than can identify individuals. Auto license plate information shall also not be deliberately captured. To mitigate the risk of potential embarrassment, emotional distress, self-censorship or diminished civic engagement by SF residents

whose personal information may be unintentionally captured, the department requires the “scrubbing” or otherwise obscuring/blurring (through use of image editing software) any collected data of facial images, license plates or other personally identifiable information unintentionally captured by aerial drones. All collected data, irrespective of the location of data capture or the identifying characteristics of captured persons, is subject to the same scrubbing processes and procedures. The image software scrubbing process obscures and blurs all data using either built-in AI recognition settings or through manual efforts by software operator. All recorded video will be stored on secured servers in the DT data center at 200 Paul Street data and data systems are physically protected, such as security systems, video surveillance, door and window locks, secured server and computer locations, and policies about mobile devices and removing hardware/software from certain locations. To protect drone data from potential breach, misuse or abuse that may result in civil rights impacts, data is maintained on secure, department-owned servers.

**C. Fiscal Analysis of Costs and Benefits**

The Department’s use of Unmanned aerial vehicles (“UAV” or “Drone” technology) yields the following business and operations benefits:

- Financial savings: UAVs can be far more time efficient and cost effective when conducting asset inspections, by mitigating the need for traffic control, expensive scaffolding/swing stage or other equipment, and can provide more detailed photographs/videos of the assets or areas in need of maintenance or repairs than can be done manually, minimizing labor costs. Lower costs
- Staff safety: UAVs can be deployed to dangerous locations instead of personnel, such as rooftops, at the sides of building/bridges, along cliff areas or areas prone to erosion.

The total fiscal cost, including initial purchase, personnel and other ongoing costs is

Number of FTE (new & existing)	2 existing
Classification	1054 and 1053
Total Salary & Fringe	\$0
Software	\$0
Hardware/Equipment	\$0
Professional Services	\$5,000
Training	\$0
Other	\$0
<b>Total Cost</b>	<b>\$5,000</b>

The Department funds its use and maintenance of the surveillance technology through a private contractor.

**COMPARISON TO OTHER JURISDICTIONS**

Unmanned aerial vehicles are currently utilized by other governmental entities for similar purposes.

## **APPENDIX A: Surveillance Impact Report Requirements**

The following section shows all Surveillance Impact Report requirements in order as defined by the San Francisco Administrative Code, Section 19B.

1. Information describing the Surveillance Technology and how it works, including product descriptions from manufacturers.

Drone technology incorporates unmanned, remotely-operated aircraft with onboard visual recording equipment, for the purpose of capturing images from an aerial perspective.

The department has decided to contract out our UAV services so the equipment will vary from vendor to vendor

2. Information on the proposed purpose(s) for the Surveillance Technology.

The UAV's will support the objective of maintaining city owned properties and landscapes by safely providing detailed photographic data and documentation to assist in the planning of corrective or new construction work by roofers, engineers, electricians, PMs, CMs and other personnel. In times of disaster preparedness or post-disaster mitigation, drones will provide critical emergency response functions such as logistical support for emergency routing, life safety, and cleanup efforts, not only assisting in protecting physical assets and public spaces but human life as well; 2. Drones will support the maintenance efforts of City-owned street trees pursuant to our mission of greening and improving City public spaces

3. If applicable, the general location(s) it may be deployed and crime statistics for any location(s).

Neighborhoods, parks, Recreation and Park department owned buildings and facilities

4. An assessment identifying any potential impact on civil liberties and civil rights and discussing any plans to safeguard the rights of the public.

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breach, misuse or abuse that may result in civil rights impacts, data is maintained on secure, department-owned servers.

5. The fiscal costs for the Surveillance Technology, including initial purchase, personnel and other ongoing costs, and any current or potential sources of funding.

Number of FTE (new & existing)	2 existing
Classification	1054 and 1053
Total Salary & Fringe	\$0
Software	\$0
Hardware/Equipment	\$0
Professional Services	\$5,000
Training	\$0
Other	\$0
Total Cost	<b>\$5,000</b>

We used a private contractor

6. Whether use or maintenance of the technology will require data gathered by the technology to be handled or stored by a third-party vendor on an ongoing basis.

No

7. A summary of the experience, if any, other governmental entities have had with the proposed technology, including information about its effectiveness and any known adverse information about the technology such as anticipated costs, failures, or civil rights and civil liberties abuses.