



Surveillance Impact Report

Unmanned Aerial Vehicles or Drone technology
Recreation and Parks Department (RPD)

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 or Drone technology.

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 Unmanned aerial vehicles Drone technology to:

1. 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 may support the maintenance and construction efforts by providing detailed photographic data of City-owned assets managed by RPD:
 - 4,113 acres of recreational and open space,
 - 3,400 acres within San Francisco,
 - 671 marina slips,
 - 220 neighborhood parks,
 - 179 playgrounds and play areas,
 - 82 recreation centers and clubhouses,
 - 72 basketball courts and 151 tennis courts,
 - 59 soccer/playfields (and growing),
 - 1 Family Camp.

Recreation and Parks shall use Unmanned aerial vehicles or Drone technology only for the following authorized purposes:

Authorized Use(s):

Disaster preparedness and response

Environmental monitoring and documentation

Inspect/Survey properties & assets

Project inspection and documentation

Surveying/Mapping data collection

Prohibited use cases include any use case not mentioned in the Authorized Uses section above.

The following use cases are expressly prohibited:

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

Department technology is located at RPD capital project sites, RPD buildings, parks, playgrounds, open space areas, recreation sites (e.g. courts).

Technology Details

The department has decided to contract out our UAV services so the equipment will vary from vendor to vendor. To date, we have not had any drone flights. Upcoming flights may include the Margaret Hayward Playground Improvement project, and the Garfield Pool Renovation project.

A. How It Works

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

All data collected or processed by Unmanned aerial vehicles or Drone technology will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by:

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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:

- Education
- Community Development
- Health

Environment

To inspect trees and other park features for project and/ or maintenance related work.

Criminal Justice

Jobs

Housing

Other

To inspect trees and other park features to ensure public safety

Additional benefits include:

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. Only persons authorized to utilize the raw data may access the information and are required to maintain records of access using a drone data access log. Only data that has been edited to remove PII will be shared and stored on servers. Additionally, all contractors will be required to have a valid FAA-issued Unmanned Aerial Vehicle license.

C. Fiscal Analysis of Costs and Benefits

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

Benefit	Description	Quantity/Units
<input checked="" type="checkbox"/> Financial savings	Mitigating the need for traffic control, expensive scaffolding/swing stage or other equipment, and can provide more detailed photographs/videos of the	Lower costs

- assets or areas in need of maintenance or repairs than can be done manually, minimizing labor costs.
- Time savings Deploying a drone can provide time savings over setting up and employing equipment such as scaffolds/swing stages/scissor-lift vehicles, etc. Lower labor hours
 - Staff safety Drones 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. Safety of staff
 - Improved data quality Locations which are difficult to access by personnel may be more easily photographed using drone technology, thereby achieving better data. N/A
 - Other

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

FTE (new & existing)	1		
Classification	1090 and 5500 series		
	Annual Cost	Years	One-Time Cost
Total Salary & Fringe	\$5000	0	\$0
Software	\$0	0	\$0
Hardware/Equipment	\$0	0	\$0
Professional Services	\$0	0	\$20,000
Training	\$0	0	\$0
Other	\$0	0	\$0
Total Cost [Auto-calculate]	\$25,000		

2.1 Please disclose any current or potential sources of funding (e.g. potential sources = prospective grant recipients, etc.). SIR, ASR

Capital funds will be utilized for Capital projects; Operational funds for operational activities.

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

Capital funds.

COMPARISON TO OTHER JURISDICTIONS

Unmanned aerial vehicles or Drone technology 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. To date, we have not had any drone flights. Upcoming flights may include the Margaret Hayward Playground Improvement project, and the Garfield Pool Renovation project.

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

Drone technology will support RPD's mission through the following ways:

1. 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 may support the maintenance and construction efforts by providing detailed photographic data of City-owned assets managed by RPD:

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

RPD capital project sites, RPD buildings, parks, playgrounds, open space areas, recreation sites (e.g. courts)

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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Additionally, all contractors will be required to have a valid FAA-issued Unmanned Aerial Vehicle license.

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)	Varies
Classification	1090 and 5500 series
Total Salary & Fringe	\$5000
Software	\$0
Hardware/Equipment	\$0
Professional Services	\$20,000

Training	\$0
Other	\$0
Total Cost [Auto-calculate]	\$25,000

Capital funds will be utilized for Capital projects; Operational funds for operational activities.

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.

Handled by third-party vendor, ongoing: True

Vendor name: The department has decided to contract out our UAV services so the equipment will vary from vendor to vendor. To date, we have not had any drone flights. Upcoming flights may include the Margaret Hayward Playground Improvement project, and the Garfield Pool Renovation project.

Special data handling required: True

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.

APPENDIX B: Mapped Crime Statistics

The general location(s) it may be deployed and crime statistics for any location(s):

RPD capital project sites, RPD buildings, parks, playgrounds, open space areas, recreation sites (e.g. courts)