



# Surveillance Impact Report

ALPR - City-Owned Garages  
Municipal Transportation Agency

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 - City-Owned Garages.

## DESCRIPTION OF THE TECHNOLOGY

The Department’s mission is to connect San Francisco through a safe, equitable, and sustainable transportation system.

In line with its mission, the Department uses ALPR - City-Owned Garages to The SFMTA uses ALPR technology to link parking tickets to vehicles parked in City-owned garages to calculate parking fees. This use supports the SFMTA’s mission because it maximizes the integrity of parking revenues, which the SFMTA uses to fund elements of the larger transportation system, including transit.

Municipal Transportation Agency shall use ALPR - City-Owned Garages only for the following authorized purposes:

### *Authorized Use(s):*

Links individual vehicles to their times of entry into City-owned parking garages to accurately calculate parking fees.

Identify vehicles parked in City-owned garages that are the subject of an active investigation by the SFPD (e.g., stolen vehicles, amber alerts, arrest warrants), but only if requested by the SFPD who must provide a specific license plate number.

The following use cases are expressly prohibited.

Department technology is located Entry and Exits of the Parking garages.

## Technology Details

The following is a product description of ALPR - City-Owned Garages

VRS-N60E vandal-proof 2MP IP imaging unit with customized illumination for optimum LPR performance in low light and under all weather conditions, for essential logistics and security performance VRS-N60E provides precision and efficiency in low-to-mid speed access control, parking and security/surveillance applications, including critical facilities – for all reflective and non-reflective license plate types. The highly reliable, compact VRS-N60E Imaging unit features state-of-the-art hardware along with HTS’s powerful, patented PC-based license plate recognition (LPR) and VRS-SeeControl management software. The hardware is optimized specifically for high performance with HTS software applications. With its built-in VRS Controller Application, the VRS-N60E provides

maximum effectiveness as it's specifically engineered for optimal accuracy, confidence and vehicle recognition solutions. HTS Imaging Units and value-added HTS solutions are field-proven in over 40 countries worldwide, including the United States. Sophisticated HTS algorithms identify both the state and country of any license plate. The VRS-N60E's live IP video streaming extends functionality to real-time monitoring applications, providing both an image of the license plate and video stream of the event.

A. How It Works

To function, ALPR - City-Owned Garages An ALPR is a camera that captures color images of license plates within its field of view. Fixed cameras are mounted on ceilings or poles inside City-owned parking garages. Cameras are triggered only when vehicles are moving over an arming loop, and cameras are positioned to focus only on license plates. Software extracts the license plate numbers from the images and stores the images, plate numbers, and dates, times, and locations of the image captures in a searchable database. An ALPR system consists of the cameras, the software that reads and converts images of license plates into data, and the searchable database that stores the data. .

Data collected or processed by ALPR - City-Owned Garages 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 [Technology name] has the following benefits for the residents of the City and County of San Francisco:

- Education
- Community Development
- Health
- Environment
- Criminal Justice      Identifies vehicles reported to, and that are subject to an active investigation by, the SFPD.
- Jobs
- Housing

Other

Ensures customers with lost tickets pay the actual value of their vehicle's stay in the parking garage; eliminates need to charge flat rate for all lost tickets.

Additional benefits include:

N/A.

#### 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:

**Dignity Loss:** Technical safeguards make this impact (e.g., embarrassment and emotional distress) negligible or nonexistent because the ALPR cameras take photos of vehicle license plates only; they do not capture images of vehicle occupants. Cameras are triggered only when vehicles are moving over an arming loop, and cameras are positioned to focus only on license plates. Cameras would capture images of a person only if they were in between the license plate and camera when the vehicle is driving over a loop, which is unlikely.

**Discrimination:** Technical safeguards make this impact (i.e., unfair or unethical differential treatment of individuals or denial of civil rights) nonexistent because it does not distinguish among SFMTA parking garage customers who consent to its use.

**Economic Loss:** Technical safeguards make this impact (e.g., identify theft/misidentification) nonexistent because the ALPR system has no access to information identifying individuals, including vehicle owners or drivers.

**Loss of Autonomy:** Technical safeguards make this impact (e.g., loss of control over decisions on how personal information is used or processed) negligible or non-existent because the ALPR system has no access to information identifying individuals, including vehicle owners or drivers.

**Loss of Liberty:** Administrative safeguards make this impact (i.e., improper exposure to arrest or detainment due to incomplete or inaccurate data) non-existent because SFPD validate data (i.e., they confirm vehicle they seek are in parking garages associated with corresponding license plates) before taking any action.

**Physical Harm:** Technical safeguards make this impact (e.g., physical harm or death) non-existent because the ALPR system has no access to information identifying individuals.

**Loss of Trust:** Technical safeguards make this impact (e.g., breach of implicit or explicit expectations or agreements about the processing of data, or failure to meet subjects' expectation of privacy for information collected) negligible or non-existent because license plate numbers are used to associate vehicles with their corresponding parking ticket so the SFMTA can accurately determine parking fees for lengths of stay.

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

The Department's use of ALPR - City-Owned Garages yields the following business and operations benefits:

Benefit	Description	Quantity/Units
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Financial savings

Reduces the need for attendants at City-owned parking garages; parking garage staff can be consolidated at command centers that serve all garages or reassigned to perform duties the SFMTA used to outsource (e.g., painting, janitorial, and maintenance).

Time savings

Helps parking garage staff manage multiple parking garages simultaneously from a central location.

Staff safety

Parking staff no longer required to work within confined areas in parking garages.

Improved data quality

Improves data required to calculate parking fees, especially when patrons lose their tickets.

Other

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

FTE (new & existing)	None. Parking vendor's staff uses ALPR to assist with frictionless parking and exception transactions such as lost tickets. No separate SFMTA staff used to operate cameras.		
Classification	N/A		
	<b>Annual Cost</b>	<b>Years</b>	<b>One-Time Cost</b>
Total Salary & Fringe	\$0	0	\$0
Software	\$0	0	\$0
Hardware/Equipment	\$0	0	\$587,181
Professional Services	\$0	0	\$17,500
Training	\$0	0	\$850
Other	\$0	0	\$0

Total Cost [Auto-calculate]	\$604,681
2.1 Please disclose any current or potential sources of funding (e.g. potential sources = prospective grant recipients, etc.). <sup>SIR, ASR</sup>	
SFMTA Capital Improvement Project (CIP) Budget for initial system; SFMTA Operating Budget for ongoing operations.	
<p>The Department funds its use and maintenance of the surveillance technology through SFMTA Capital Improvement Project (CIP) Budget for initial system; SFMTA Operating Budget for ongoing operations.</p> <p><b>COMPARISON TO OTHER JURISDICTIONS</b></p> <p>ALPR - City-Owned Garages are currently utilized by other governmental entities for similar purposes.</p>	
<p><b>APPENDIX A: Surveillance Impact Report Requirements</b></p> <p>The following section shows all Surveillance Impact Report requirements in order as defined by the San Francisco Administrative Code, Section 19B.</p>	
1. Information describing the Surveillance Technology and how it works, including product descriptions from manufacturers.	
<p>An ALPR is a camera that captures color images of license plates within its field of view. Fixed cameras are mounted on ceilings or poles inside City-owned parking garages. Cameras are triggered only when vehicles are moving over an arming loop, and cameras are positioned to focus only on license plates.</p> <p>Software extracts the license plate numbers from the images and stores the images, plate numbers, and dates, times, and locations of the image captures in a searchable database.</p> <p>An ALPR system consists of the cameras, the software that reads and converts images of license plates into data, and the searchable database that stores the data.</p> <p>VRS-N60E vandal-proof 2MP IP imaging unit with customized illumination for optimum LPR performance in low light and under all weather conditions, for essential logistics and security performance VRS-N60E provides precision and efficiency in low-to-mid speed access control, parking and security/surveillance applications, including critical facilities – for all reflective and non-reflective license plate types.</p> <p>The highly reliable, compact VRS-N60E Imaging unit features state-of-the-art hardware along with HTS's powerful, patented PC-based license plate recognition (LPR) and VRS-SeeControl management software. The hardware is optimized specifically for high performance with HTS software applications. With its built-in VRS Controller Application, the VRS-N60E provides maximum effectiveness as it's</p>	

<p>specifically engineered for optimal accuracy, confidence and vehicle recognition solutions.</p> <p>HTS Imaging Units and value-added HTS solutions are field-proven in over 40 countries worldwide, including the United States. Sophisticated HTS algorithms identify both the state and country of any license plate.</p> <p>The VRS-N60E's live IP video streaming extends functionality to real-time monitoring applications, providing both an image of the license plate and video stream of the event.</p>
<p>2. Information on the proposed purpose(s) for the Surveillance Technology.</p>
<p>The SFMTA uses ALPR technology to link parking tickets to vehicles parked in City-owned garages to calculate parking fees. This use supports the SFMTA's mission because it maximizes the integrity of parking revenues, which the SFMTA uses to fund elements of the larger transportation system, including transit.</p> <p>N/A</p>
<p>3. If applicable, the general location(s) it may be deployed and crime statistics for any location(s).</p>
<p>Entry and Exits of the Parking garages</p>
<p>4. An assessment identifying any potential impact on civil liberties and civil rights and discussing any plans to safeguard the rights of the public.</p> <ul style="list-style-type: none"> <li>• Dignity Loss: Technical safeguards make this impact (e.g., embarrassment and emotional distress) negligible or nonexistent because the ALPR cameras take photos of vehicle license plates only; they do not capture images of vehicle occupants. Cameras are triggered only when vehicles are moving over an arming loop, and cameras are positioned to focus only on license plates. Cameras would capture images of a person only if they were in between the license plate and camera when the vehicle is driving over a loop, which is unlikely.</li> <li>• Discrimination: Technical safeguards make this impact (i.e., unfair or unethical differential treatment of individuals or denial of civil rights) nonexistent because it does not distinguish among SFMTA parking garage customers who consent to its use.</li> <li>• Economic Loss: Technical safeguards make this impact (e.g., identify theft/misidentification) non-existent because the ALPR system has no access to information identifying individuals, including vehicle owners or drivers.</li> <li>• Loss of Autonomy: Technical safeguards make this impact (e.g., loss of control over decisions on how personal information is used or processed) negligible or non-existent because the ALPR system has no access to information identifying individuals, including vehicle owners or drivers.</li> <li>• Loss of Liberty: Administrative safeguards make this impact (i.e., improper exposure to arrest or detainment due to incomplete or inaccurate data) non-existent because SFPD validate data (i.e., they confirm vehicle they seek are in parking garages associated with corresponding license plates) before taking any action.</li> <li>• Physical Harm: Technical safeguards make this impact (e.g., physical harm or death) non-existent because the ALPR system has no access to information identifying individuals.</li> </ul>

- Loss of Trust: Technical safeguards make this impact (e.g., breach of implicit or explicit expectations or agreements about the processing of data, or failure to meet subjects' expectation of privacy for information collected) negligible or non-existent because license plate numbers are used to associate vehicles with their corresponding parking ticket so the SFMTA can accurately determine parking fees for lengths of stay.

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)	None. Parking vendor's staff uses ALPR to assist with frictionless parking and exception transactions such as lost tickets. No separate SFMTA staff used to operate cameras.	
Classification	N/A	
Total Salary & Fringe		\$0
Software	\$0	
Hardware/Equipment	\$587,181	
Professional Services	\$17,500	
Training	\$850	
Other	\$0	
Total Cost [Auto-calculate]	\$604,681	

SFMTA Capital Improvement Project (CIP) Budget for initial system; SFMTA Operating Budget for ongoing operations.

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:

Special data handling required:

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):

Entry and Exits of the Parking garages