



DATE: June 14, 2022

TO: Seattle City Council

FROM: Brian Maxey, SPD Chief Operating Officer

SUBJECT: Automated License Plate Reader (ALPR) for Patrol Surveillance Impact Report – CB 120025

The Seattle Police Department appreciates the opportunity to address the concerns raised in Sections 2 and 3 of Council Bill 120025, passed in April 2021 and approving use of the Automated License Plate Reader technology for SPD patrol vehicles.

CB 120025, Section 2 – ALPR Equity Metrics

SPD currently has eleven vehicles equipped with ALPR and deployed across all five precincts, based on the size of the jurisdiction. North Precinct has 3 such vehicles, while South, East, and West Precincts each have 2, and the West Precinct has 1. There is a single additional unmarked vehicle assigned to a Citywide follow-up unit. Deployment of these limited resources could lead to disproportionality based on census demographics for each precinct, but the distribution is spread evenly across all precincts. At the public session, community members asked why *all* patrol calls did not have ALPR technology, which has been a cost issue in the past. However, the FLEET 3 upgrade to the In-Car Video system will provide an optional capability for all patrol cars to have ALPR. SPD submits that this would achieve operational neutrality as this would eliminate discretion in deployment completely and is exploring this option.

Other than monitoring deployment across precincts to help ensure fair distribution, there are no additional equity metrics that SPD can reasonably supply that would be meaningful. With a 90-day retention period, there are currently nearly 1.4 million individual license plate reads in the system. While geographic data is theoretically available for each, the sheer quantity of data means that it cannot be easily mapped out or analyzed.

CB 120025, Section 3 – Feasibility of a 48-hour Retention Period

SPD's position on this issue is guided by the operational practicalities of criminal investigations which cannot be confined nor defined by a static time frame, in part, due to the various constitutional protections and safeguards law enforcement must adhere to in investigating. Even if such a time frame could be met with any degree of regularity, no investigations are initiated off non-case specific ALPR data. ALPR it is not a live-tracking system, rather, the data captured by ALPR is merely a photo of a license plate with no personal identifiers. That information alone does not permit SPD, under its current policy concerning ALPR data and access in non-case specific situations, to do anything with ALPR data without first crossing separate thresholds (properly accessing the Department of Licensing or criminal databases, which SPD must first have a specific reason for consulting before doing so). Considering the above, SPD simply does not have the capabilities to resolve questions of whether the data is case related within 48 hours, and any such retention period is therefore wholly unfeasible.

CC:

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