Department/Division: Police - Special Project and Legislative Affairs

Related Policy/Procedure:

- DP 1.51 Automatic License Plate Recognition (ALPR)
- DP 3.02 Property and Evidence

Revised August 1, 2025

DESCRIPTION

ALPR systems have proven to be powerful and effective tools for the San Diego Police Department, helping officers identify suspect vehicles, solve cases faster and use resources more efficiently.

Last year, ALPR technology played a critical role in the arrest of 208 suspects and the recovery of an estimated \$3 million in stolen property, including 223 stolen vehicles and 10 firearms. The system helped locate a missing man with dementia, apprehend a suspect wanted for attempting to kidnap two children, and track down suspects in a series of hate crimes in Hillcrest.

Officers have used ALPR images and data in over 140,000 investigative queries, supporting efforts across divisions, council districts, and with partner agencies throughout the City and County of San Diego. The technology played a key role in 294 cases and has strengthened collaboration and expanded investigative reach.

This technology supports precision policing. It reduces the need for broad patrols, helping officers focus their efforts and avoid unnecessary stops, saving both time and resources. ALPR has also become a valued, industry-standard tool that supports officer recruitment and retention.

The San Diego Police Department remains committed to using ALPR technology responsibly and transparently to enhance public safety while protecting civil liberties.

SHARING OF DATA

In addition to providing ALPR data to the District Attorney's Office for criminal prosecution, SDPD accessed or shared ALPR images or data with other law enforcement agencies after a qualifying crime had occurred, such as a homicide or shooting, and when there was a legitimate investigative need.

In a few serious cases last year involving crimes such as human trafficking, an assault against an officer and crimes against children, the Department shared ALPR data with out-of-state and federal law enforcement agencies. None of the qualifying crime cases were related to immigration enforcement. (See Addendum A for a comprehensive list of outside agency data sharing.)

After receiving guidance from the California Department of Justice, SDPD immediately ended all such sharing with federal and out-of-state departments. This decision was formalized in a Department-wide order in May 2025.

Additionally, SDPD identified a brief period after system launch during which other California law enforcement agencies could temporarily access SDPD's ALPR data. As the Department discussed in a memo issued to the Privacy Advisory Board and each member of City Council on June 13, 2025, this period was mistakenly left out of the Annual Surveillance Report and has been added to the Unauthorized Access section below.

These changes reflect the Department's commitment to responsible technology use and public trust.

UPDATES, UPGRADES, AND CONFIGURATION CHANGES

There have been no updates, upgrades, or configuration changes that expanded or reduced the surveillance technology's capabilities.

ANNUAL COST

These costs are duplicates of the Smart Streetlight (SSL) costs as this is an embedded technology, and the cost is built into the SSL costs.

On 12-26-2023 an initial payment of \$3,512,500 was paid for installation and one (1) year on service for the 500 Smart Streetlights with embedded Automated License Plate Recognition technology.

On 6-24-2024 a payment of \$6,800 was disbursed for relocation of SSL/ALPR units.

On 12-11-2024 a payment of \$1,449,602.08 was authorized for calendar year 2025 contract obligations.

All funding sources were from the City's General Fund.

LOCATION

The Smart Streetlights with embedded ALPR technology were attached to City of San Diego streetlight poles.

DEPLOYMENT LOCATION

The Smart Streetlights with embedded ALPR technology were deployed Citywide in all police divisions.

Current camera deployment locations can be found at the link below.

• https://webmaps.sandiego.gov/portal/apps/webappviewer/index.html



COMMUNITY COMPLAINTS OR CONCERNS

Since SDPD's ALPR program launched, some community members have raised concerns including over how the technology protects people's privacy, if it could be used in immigration or reproductive rights investigations, and whether the data collected would be vulnerable to outside access.

SDPD has taken these concerns seriously. We've worked to educate the public, strengthen policies, and partner closely with the Privacy Advisory Board to ensure the community can feel confident this technology is being used responsibly to keep our neighborhoods safe.

Additionally, the Department received a letter dated July 31, 2024, from the Community Advocates for Just and Moral Governance titled "Notice of Violations of the TRUST Ordinance – Smart Streetlights and Automated License Plate Readers." No other written complaints or concerns have been filed with the Department.

The Department remains committed to working with community groups, the Privacy Advisory Board, and elected officials to ensure continued public education and transparency around this technology. The Use Policy continues to outline clear safeguards to protect civil rights and civil liberties.

AUDITS OR INVESTIGATIONS

Several months after the system's launch, a supervisor of the Special Projects and Legislative Unit began conducting weekly audits of the entries filed when individuals would access the technology. These audits revealed inconsistencies in the metadata of these entries, resulting in several audit improvements, including one that was piloted in San Diego and has now become standard practice across Flock's network. (Flock is the subcontractor that provides the ALPR equipment and services.)

In the Flock Safety interface, users conducting a search of ALPR data were required to enter a "Reason" for the search, but it did not prompt users to include a case or incident number. Because of this, users provided appropriate reasons for a search, which is in line with the Department's Surveillance Use Policy, but because there was not a more detailed prompt, more specific information was omitted.

To address this, on January 26, 2024, the audit issued ORDER OR 24-04, which requires all ALPR users to:

- Include a specific case number or incident number in the "reason" field when conducting searches.
- Ensure the event is linked to a specific crime (broad entries like "11-86" are no longer acceptable).
- Add relevant details to assist with investigative documentation and future court proceedings.

Because this update was implemented after system launch, it took users time to adjust. However, any time a user conducted a search without the appropriate metadata, a supervisor immediately addressed the issue. All searches were verified to be connected to an active case number or event number in compliance with the Use Policy.

SDPD also worked with Flock Safety to create a new, dedicated "Case/Incident Number" field in addition to the "reason" field. This section was added to the Flock Safety interface nationwide, resulting in more thorough entries and audits.

The Department Order is part of this year's Annual Training related to the ALPR system and will be rolled into annual training moving forward.

As previously discussed, another kind of internal audit identified the period at our system's launch when an improper setting mistakenly allowed California law enforcement agencies to access SDPD's ALPR data in late December 2023 to early January 2024. That setting was immediately corrected and hasn't occurred since.

This incident motivated the Department to build on its audit process by including the Department's Research, Analysis and Planning Unit (RAP) (the Department's internal auditing and controls unit) earlier in the process and by mandating quarterly audits. On April 25, 2025, a Department Order was issued requiring surveillance technology Subject Matter Experts (SME) to conduct these enhanced audits.

As part of this process:

- All SMEs will conduct quarterly audits of the requirements in the Annual Report to enhance record keeping and ensure greater accuracy of the Annual Report.
- Department SMEs will conduct audits at random for uses of the technology.
- The Department will create share logs to document what data is shared and why.
- RAP will conduct independent audits to confirm share logs are completed, ensure that use policies are current, and ensure that system user access is up to date.
- Any violation will be immediately reported to RAP for documentation and corrections.

DATA BREACH DETECTION

SDPD works closely with the City's Department of Information Technology (IT) to assess cybersecurity risks, approve technology, and ensure proper governance. For additional details related to IT governance processes, refer to the information at the following link:

https://www.sandiego.gov/sites/default/files/fy23-fy27-it-strategic-plan-sd.pdf

Key safeguards in place:

All ALPR data is stored in secure law enforcement facilities with multiple layers of physical and digital protection.

Encryption, firewalls, and authentication protocols are used to protect all digital evidence.

Access is strictly limited to SDPD personnel in investigative or enforcement roles, and only those authorized by the Chief of Police may access ALPR data.

Flock Safety also follows strict data security protocols and undergoes regular third-party audits. Their system uses Amazon Web Services (AWS), a cloud platform built for high-level government security. Flock uses advanced encryption (256 bit), role-based access, and is CJIS-compliant. They maintain multiple third-party certifications, including SOC 2 (Type II), SOC 3, and ISO 27001. All ALPR data downloaded from a video management solution to a mobile workstation or to digital evidence storage like Axon evidence is only accessible through a login/password-protected system capable of documenting all access of information by name, date and time.

DATA BREACH OR UNAUTHORIZED ACCESS

Although California law permits ALPR database access between California agencies, the City's Contract and Use Policy for ALPR bars outside agencies from accessing SDPD's ALPR Flock database. While there was no data breach, there was a brief period of unauthorized access by other California law enforcement agencies due to a system configuration error at the system's launch.

As a result of the system misconfiguration, from December 29, 2023, to January 17, 2024, SDPD's ALPR camera system was inadvertently included in 12,914 searches conducted by other state agencies. No out-of-state or federal law enforcement agencies had access to data during this period. While an additional 795 searches were conducted on December 28, 2023, none of the Department's cameras had been turned on, so there was no data available to search.

Of the 12,914 searches conducted by other state agencies, 12,202 were for a specific license plate or partial license plate, and around 50 percent were repeated inquiries for the same license plate wanted in connection with an investigation.

Below is a table showing the number of cameras active on each day and the number of searches conducted by other state agencies:

Date	Active Cameras	Searches
28-Dec	0	795
29-Dec	7	1099
30-Dec	7	462
31-Dec	7	717
1-Jan	7	231
2-Jan	7	592
3-Jan	9	1060
4-Jan	10	1040
5-Jan	13	655
6-Jan	13	554

7-Jan	13	343
8-Jan	21	571
9-Jan	26	922
10-Jan	32	981
11-Jan	35	898
12-Jan	35	514
13-Jan	35	458
14-Jan	35	200
15-Jan	35	379
16-Jan	39	635
17-Jan	41	503

Search Timeframe	Number of Searches
2023 Searches	3,073
2024 Searches	10,536
Total	13,609
December 28, 2023, Searches	-795
Actual Searches	12,914

The initial unauthorized access was discovered through an internal audit on or around January 17, 2024. The Department immediately notified Flock, which corrected the datasharing settings the same day. This issue has not occurred since.

INFORMATION AND STATISTICS

Should the public want to access crime statistics for the City of San Diego, they can visit the City's *Crime Statistics & Crime Mapping* webpage: <u>Crime Statistics & Crime Mapping</u> | <u>City of San Diego Official Website</u>. Accessible via this webpage is the City's neighborhood crime summary dashboard: <u>San Diego Neighborhood Crime Dashboard (arcgis.com)</u>. A tab on this dashboard, Crime Data Explorer, allows the user to query crimes specific to a City neighborhood.

Additionally, crime data is also available on the City's Open Data Portal: <u>Datasets - City of San Diego Open Data Portal</u>. This crime data can be downloaded into usable files; also available on this site are dictionaries to help navigate the different data sets.

Investigation Assists	
187	7
211	6
207	3

245DV	1
245	5
261	2
288	3
459	10
Traffic	3
Other	10

ALPR Responses		
10851 Recovered	223	
10851 In Custody	175	
SDPD Hotlist	18	
Missing Persons	1	

Totals	
Total Events	294
Total In Custody	208
Estimated Recovered Value	\$3,055,400
Recovered Guns	10

CALIFORNIA PUBLIC RECORDS ACT REQUESTS

There were five Public Records Act requests related to ALPR in calendar year 2024:

Request Number	Request Date	Closed Date
24-1400	2/23/2024	4/16/2024
24-6236	9/10/2024	9/14/2024
24-6912	10/6/2024	10/20/2024
24-7450	10/24/2024	10/24/2024
24-7913	11/12/2024	11/16/2024

REQUESTED MODIFICATIONS TO THE USE POLICY

The following modifications to the Automated License Plate Recognition Use Policy are proposed.

• Add reference to California Senate Bill 34 under the subsection that defines prohibited ALPR uses including those that violate federal, state or local laws.



- Add to the Third-Party Data Sharing section that ALPR data shall not be shared with private entities or out-of-state or federal agencies, including out-of-state and federal law enforcement agencies in accordance with SB 34.
- Replace references to "Special Projects and Legislative Affairs" & "SPLA" with "program administrator."
 - o This change aligns with the new SDPD command structure.
- Remove section with header "Modifications to the Use Policy."
 - This change aligns this use policy with all other SDPD technology use policies.
 Modifications to a Surveillance Use Policy are governed by the Transparent and Responsible Use of Surveillance Technology Ordinance.
- Other additional typos and language corrections. These corrections do not have an impact on the use of the technology.



ADDENDUM A – OUTSIDE AGENCY SHARING

HOW SDPD HANDLES ALPR SEARCH REQUESTS

SDPD does not grant outside agencies direct access to its ALPR system. When another law enforcement agency needs assistance, they must contact SDPD, explain the qualifying reason for the request (such as a serious crime or public safety emergency), and then SDPD personnel conduct the search internally. The requesting agency is then informed of the relevant result, including whether no information was found.

The only exception to this process occurred during the three-week period following system launch when a configuration error temporarily allowed other California law enforcement agencies to search SDPD's system directly. That issue was identified and fixed in January 2024.

SEARCHES CONDUCTED DURING THREE-WEEK LAUNCH PERIOD

California Agency	Times Shared
Alameda County Sheriff's Office	307
Alhambra Police Department	31
Anaheim Police Department	11
Anderson Police Department	4
Atherton Police Department	1
Auburn Police Department	4
Azuza Police Department	1
Bakersfield Police Department	5
Baldwin Park Police Department	33
Beaumont Police Department	71
Bell Gardens Police Department	1
Benicia Police Department	7
Beverly Hills Police Department	5
Brea Police Department	14
Brisbane Police Department	3
Buena Park Police Department	59
Burbank Airport Police Department	4
Burbank Police Department	21
Chino Police Department	56
Cal Fire	10
Cal State Fullerton	1
California Highway Patrol	91
Campbell Police Department	1
Capitola Police Department	33
Cathedral City Police Department	4
Citrus Heights Police Department	8
City of Riverside Police Department	11

Claremont Police Department	2
Colma City Police Department	6
Concord Police Department	2
Contra Costa County Sheriff's Office	168
Corona Police Department	102
Costa Mesa Police Department	10
Covina Police Department	65
Culver City Police Department	26
Cyprus Police Department	26
Danville Police Department	22
Delano Police Department	4
Dixon Police Department	12
East Bay Parks	12
El Cajon Police Department	2
El Centro Police Department	33
El Monte Police Department	220
Elk Grove Police Department	18
Escalon Police Department	8
Escondido Police Department	12
Fairfield Police Department	28
Farmersville Police Department	2
Folsom Police Department	10
Fontana Police Department	153
Fort Bragg Police Department	2
Freemont Police Department	24
Galt Police Department	5
Garden Grove Police Department	144
Gilroy Police Department	40
Glendale Police Department	8
Glendora Police Department	61
Grass Valley Police Department	11
Hanford Police Department	7
Hayward Police Department	60
Hemet Police Department	4
Hercules Police Department	69
Hillsborough Police Department	2
Hollister Police Department	1
Huntington Beach Police Department	25
Imperial City Police Department	1
Imperial County Sheriff's Office	1
Indio Police Department	18
Irvine Police Department	104
Kern County Sheriff's Office	257
	257

Vings County Shariff's Office	17
Kings County Sheriff's Office	17
La Habra Police Department	5
Laverne Police Department	5
Laguna Beach Police Department	36
Los Angeles County Sheriff's Office	564
Lincoln Police Department	2
Lindsay Public Safety Department	5
Livermore Police Department	35
Lodi Police Department	14
Los Angeles Police Department	104
Madera County Sheriff's Office	1
Marin County Sheriff's Office	9
Mendocino County Sheriff's Office	2
Menifee Police Department	1
Menlo Park Police Department	32
Merced County Sheriff's Department	8
Monrovia Police Department	18
Montclair Police Department	36
Monterey County Sheriff's Office	7
Monterey Park Police Department	1
Moraga Police Department	7
Morgan Hill Police Department	150
Mountain View Police Department	31
Murrieta Police Department	220
Napa County Sheriff's Office	77
Northern California Regional Intelligence Center	53
Newark Police Department	21
Newport Beach Police Department	9
Novato Police Department	1
Oakley Police Department	16
Orange County Sheriff's Office	1225
Oceanside Police Department	8
Ontario Police Department	69
Orange Police Department	37
Orange County District Attorney's Office	8
Oxnard Police Department	21
Palm Springs Police Department	20
Palo Alto Police Department	23
Pasadena Police Department	1
Placentia Police Department	22
Placer County Sheriff's Office	56
Pleasanton Police Department	1
Pomona Police Department	51

Porterville Police Department	11
Redlands Police Department	8
Redwood City Police Department	83
Rialto Police Department	15
Rio Vista Police Department	53
Riverside County District Attorney's Office	19
Riverside County Sheriff's Office	2037
Rocklin Police Department	12
Sacramento District Attorney's Office	10
Sacramento Police Department	20
Salinas Police Department	3
San Bernadino County Sheriff's Office	208
San Bruno Police Department	122
San Diego Sheriff's Office	117
San Francisco Police Department	121
San Juaquin County Sheriff's Office	145
San Leandro Police Department	3
San Louis Obispo Police Department	7
San Mateo Police Department	60
San Mateo County Sheriff's Office	284
San Ramon Police Department	17
Santa Barbera County Sheriff's Office	270
Santa Clara Police Department	202
Santa Cruz Police Department	2
Santa Maria Police Department	36
Santa Monica Police Department	1
Santa Rosa Police Department	60
Seal Beach Police Department	1
Simi Valley Police Department	10
Solano County Sheriff's Office	255
Sonoma County Sheriff's Office	91
Stockton Police Department	33
Suisun City Police Department	2
Torrance Police Department	1
Tracy Police Department	84
UC Riverside Police Department	1
Ukiah Police Department	15
Union City Police Department	4
Upland Police Department	80
Vacaville Police Department	31
Vallejo Police Department	21
Ventura Police Department	62
Ventura County Sheriff's Office	41

Vernon Police Department	5
Visalia Police Department	57
Watsonville Police Department	25
West Covina Police Department	99
Wes Sacramento Police Department	3
Westminster Police Department	20
Whittier Police Department	6
Willits Police Department	2
Woodlake Police Department	26
Yreka Police Department	4

SEARCHES CONDUCTED BY SDPD FOR A CALIFORNIA AGENCY

California Agency	Times Shared
Alameda County Sheriff's Office	1
Anaheim Police	1
Belmont Police	1
Cal Automated Fingerprint Identification System	3
California Highway Patrol	19
Carlsbad Police	8
Chula Vista Police	51
Crime Stoppers	1
El Cajon Police	21
Escondido Police	6
Eureka Police	1
Huntington Beach Police	2
Imperial City Police	1
Indio Police	1
La Mesa Police	16
Long Beach Police	1
Los Angeles Airport Police	1
Los Angeles District Attorney's Office	1
Murietta Police	2
National City Police	61
Oceanside Police	7
Orange County Sheriff's Department	1
Redland Police	1
San Diego County Regional Auto Theft Task Force	4
San Diego Harbor Police	11
San Diego Sheriff's Office	99
San Diego Community College District Police	1

San Diego State University Police	2
University of California, San Diego Police	7
Whittier Police	3

SEARCHES CONDUCTED BY SDPD UPON REQUEST OF OUT-OF-STATE AGENCIES

Out-of-State Agency	Times Shared
Portsmouth Police (New Hampshire)	2

SEARCHES CONDUCTED BY SDPD UPON REQUEST OF FEDERAL OR INTERNATIONAL AGENCIES

Federal/International Agency	Times Shared
Drug Enforcement Agency	20
Federal Bureau of Investigation	3
High Intensity Drug Trafficking Areas	1
Homeland Security Investigations*	4
Internet Crimes Against Children	3
Narcotics Task Force	60
U.S. Customs and Border Protection*	6
U.S. Marshals Office	3
U.S Probation	4
U.S. Secret Service	14
United States Postal Inspection Service	8
Violent Crimes Task Force	1
Royal Canadian Mounted Police	1
San Diego Human Trafficking Task Force	3
Violent Crimes Task Force	1

^{*}These searches were not for immigration-related cases.