

AUTOMATED LICENSE PLATE READER (ALPR) POLICY

FOR

CONDUCTING PARKING STUDIES

1. Purpose

This policy establishes guidelines for the use of Automated License Plate Reader (“ALPR”) technology and data specifically for conducting parking studies in the City of Santa Ana (“City”). This policy applies to the use of ALPR technology by all Santa Ana Public Works Traffic Engineering employees, officials, contractors, and volunteers for parking data collection purposes (“PWA”).

This policy does not enable the PWA to use ALPR technology for any law enforcement or regulatory purposes.

2. ALPR Definition

ALPR technology functions by automatically capturing an image of a vehicle’s license plate, transforming that image into alphanumeric characters using optical character recognition software, and storing that information, along with relevant metadata (e.g., geo-location and temporal information, as well as data about the ALPR). There is no Personally Identifiable Information (PII) captured by the ALPR. The ALPR data does not contain any information about the name of the registered owner, address of registered owner, or any other information gleaned from the license plate number associated with a particular vehicle.

The data captured by ALPR is equivalent to the data that would otherwise be captured manually during a parking study, so the use of ALPR simply automates the process of data collection.

3. Parking Study Usage

ALPR technology allows parking study procedures to be automated, eliminating the manual counting of vehicles and manual recording of license plate numbers required to evaluate parking occupancy and duration trends. No law enforcement database shall interface or integrate with the ALPR technology utilized by PWA to conduct its parking studies.

4. Authorized Users

The Public Works Director or their designee (“Director”) shall assign personnel to operate and manage the ALPR system for official parking data collection purposes and are authorized to access the ALPR data needed to analyze results.

PWA shall not use, or allow others to use, the ALPR equipment or database records for any unauthorized purpose. The Director shall ensure that the ALPR system is operated in conformity with this policy and other City policies, procedures, rules and regulations. The Director shall enforce this policy and shall act as the Department Head for all disciplinary and enforcement actions for any violations by PWA.

Use of an ALPR is restricted to the purposes outlined below. PWA members shall not use, or allow others to use the equipment or database records for any unauthorized purpose.

- (a) Any ALPR owned or operated by the Public Works Agency ("Department") shall only be used for official parking data collection while conducting parking studies. This includes the evaluation of parking occupancy and duration trends for the purpose of evaluating parking program policies.
- (b) No member of the Department shall operate ALPR equipment or access ALPR data without first completing department-approved training.
- (c) No ALPR operator may access the Department's data unless otherwise authorized to do so.

5. Restricted Uses

The PWA shall only use ALPR Technology to collect license plate data within view of the public right-of-way. The PWA shall use ALPR Technology consistent with this policy and all applicable City, State, and Federal laws.

The Department shall not share ALPR information with any commercial or private entity, other than PWA parking contractors, as necessary for the conduct of PWA parking studies and operations. Information gathered or collected and records retained by the Department shall not be:

- (a) Sold, published, exchanged, or disclosed for commercial purposes.
- (b) Disclosed without authorization or disseminated to persons not otherwise authorized to access or use the ALPR information.

6. ALPR Data Collection and Retention

The ALPR data contains no Personally Identifiable Information (PII) that may be used to connect license plate numbers detected to an individual. The Federal Driver's Privacy Protection Act (DPPA) already prohibits the release or use of any State DMV or any officer, employee, or contractor thereof of personal information in connection with a motor vehicle record.

ALPR data shall be stored in accordance with the Department's established records retention schedule except that the license plate numbers recorded by ALPR shall not be retained beyond twenty-four (24) hours.

7. Information Sharing

This policy is specifically intended to address the use of ALPR for conducting parking studies.

The ALPR data does not contain any information about the name of the registered owner, address of registered owner, or any other information gleaned from the license plate number associated with a particular vehicle.

For the purposes of parking studies, PWA may periodically access ALPR data to analyze parking demand. This analysis process shall not use actual license plate numbers, and instead the raw license plate number data shall be hashed to produce anonymized data for the purposes of the data analysis.

8. Training

All authorized ALPR users shall first complete department-approved training on the proper handling of ALPR data. The training addresses appropriate handling and transmission procedures, as well as consequences of an ALPR data security breach.

9. Information Security

All data shall be closely safeguarded and protected by both procedural and technological means:

- (a) All ALPR data downloaded to the mobile workstation and in storage shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date, and time.
- (b) Members approved to access ALPR data under these guidelines are permitted to access the data for legitimate parking study purposes only, such as evaluating parking occupancy and duration trends to determine potential parking policy adjustments.
- (c) ALPR systems audits will be conducted on a regular basis.