November 15, 2022

**Re: November 14, 2022 Public Records Act Request**

To whom it may concern,

The City of Piedmont Police Department (“Department”) is in receipt of your Public Records Act request, which was received on November 14, 2022.

The City wishes to cooperate to the fullest extent possible with the Public Records Act (Government Code section 6250 *et seq.*). Under established California law, the City is obliged to comply with a request for a public record so long as the requester makes a specific and focused request for information, that information is maintained by the City in its ordinary course of business, the information is disclosable, and the record can be located with reasonable effort. The Public Records Act provides for the inspection or copying of existing identifiable public records; it does not compel the City to create new records, lists, privilege logs, or reports in response to a request.

Consistent with the law, the City has reviewed your request in light of City records and made the following determination(s).

A1. The names of agencies and organizations with which the Agency shares ALPR data:

**Northern California Regional Intelligence Center, Flock Safety.**

**The Department has also granted access to search data from our cameras to the following California agencies: Alameda PD, Hayward PD, Richmond PD, San Leandro PD, Concord PD, Milpitas PD, Morgan Hill PD, Oakland PD, East Bay Parks PD, Danville PD, San Ramon PD, Rocklin PD, San Mateo Co SO, Newark PD, Solano Co SO, Fairfield PD, Pleasanton PD, Napa Co SO, Santa Clara PD, Novato PD, Tracy PD, Redwood City PD, Pinole PD, Citrus Heights PD, Rio Vista PD, Elk Grove PD, Livermore PD, San Bruno PD, Campbell PD, El Cerrito PD, Marin Co SO, Santa Maria PD, Hillsborough PD, Vacaville PD, Benicia PD, Los Gatos Monte Sereno PD, Antioch PD, Fremont PD, Sausalito PD, San Mateo PD, Colma PD, Walnut Creek PD, Orinda PD, Hercules PD, Vallejo PD, Atherton PD, Dixon PD, Lodi PD, Daly City PD, Oakley PD.**

A2. The names of agencies and organizations from which the Agency receives ALPR data:

**Piedmont Police Department does not receive ALPR data from any agency.**

**The Department has been granted access to search data from cameras owned by the following California agencies:** Campbell CA PD, Vallejo CA PD, Napa County CA SO (Flex), Ontario CA PD, Ventura CA PD, Danville CA PD, City of Fremont, Oakley CA PD, Hillsborough CA PD, Orinda CA PD, Colma CA PD, Fairfield CA PD, San Mateo County CA SO, Dixon CA PD, NCRIC, San Ramon CA PD, Santa Clara CA PD, Livermore CA PD, Novato CA PD, Anderson City CA PD, San Mateo CA PD, Hercules CA PD, Roseville CA PD, San Bruno CA PD, Pleasanton CA PD

A3. The names of agencies and organizations with which the Agency shares “hot list” information:

**Piedmont Police Department does not share “hotlist” information.**

A4. The names of agencies and organizations from which the Agency receives “hot list” information.

**Piedmont Police Department receives “hot list” information from DOJ and NCIC.**

Part B - Information Related to Numbers of “Detections” (plate scans) and “Hits” (plate scans that matched to a hotlist)

B1. The aggregate number of "detections" collected during 2021.

**ALPR data is only stored for 60 days.**

B2. The aggregate number of “hits” during 2021.

**ALPR data is only stored for 60 days.**

B3. The aggregate number of "detections" from January 1, 2022 until the date this request is processed. If your agency has a retention period shorter than 1 year, please provide whatever data is available based on your retention period. For example, most Flock Safety systems may not have this data beyond 30 days.

**We only have access to total number of plate reads for the last 30 days. Total number of plate reads from October 18, 2022 to November 16, 2022 is 1,770,661. Total number of unique plate reads from October 18, 2022 to November 16, 2022 is 159,387.**

B4. The aggregate number of “hits” from January 1, 2022 until the date this request is processed. If your agency has a retention period shorter than 1 year, please provide whatever data is available based on your retention period.

**We only have hot list hits available for the last 30 days. Total hot list hits from October 18, 2022 to November 16, 2022 is 1,071.**

Part C - Assistance, Description, and Recommendations.

We make the following requests under section 6253.1 of the California Public Records Act

C1. A description of the information technology and physical location in which the records exist.

**The City of Piedmont is currently decommissioning our Neology/BOSS ALPR Cameras. We have deployed 39 Flock Safety Falcon cameras throughout the City. The Falcon is a solar powered, motion activated camera connected to the Cloud through LTE technology. The cameras do not collect information on who is driving or riding in the vehicle. The cameras take still images through a lens and cannot follow or track vehicles once they leave the cameras view. Flock Safety data is not shared without permission, sold to third parties, or used for unpaid fines, unauthorized viewing outside of a legitimate crime related event, or kept in a library. The footage is fully encrypted and stored in the cloud. All City of Piedmont footage is deleted after 60 days on a rolling basis. You can find more information on Flock Safety technology at** [**www.flocksafety.com**](http://www.flocksafety.com)

C2. Assist us identifying records and information that will help the public understand how ALPR data and hotlists are shared, how much data is collected year-to-year, and how much of that data matches a hot list; and

**The City would suggest referencing our Piedmont Police Policy 438- Automated License Plate Readers available on our website** <https://piedmont.ca.gov/UserFiles/Servers/Server_13659739/File/Policy%20438_ALPR_1_13_2022.pdf?v=zUcYifqgg> **and our Piedmont PD ALPR Transparency Portal** <https://transparency.flocksafety.com/piedmont-ca-pd>

C3. Provide suggestions for overcoming any practical basis for denying access to the information sought.

**The City of Piedmont has been able to provide the information requested.**

The Piedmont Police Department considers this request completed and closed.

Thank you for your inquiry. Please feel free to contact me if you have any questions regarding this response.

Sincerely,

*Lisa Douglas*

*Support Services Commander*

*Piedmont Police Department*