



Surveillance Use Policy BART Automated License Plate Recognition (ALPR)

BART Police and Customer Access Departments

BPD-ALPR-SUP-02

21 Day BART Board Notice – October 3rd, 2019

15 Day Public Notice – October 9th, 2019

Board Meeting – October 24th, 2019



A. Purpose

The use of Automated License Plate Recognition (ALPR) technology seeks to increase the confidence of the public while using BART's public transportation system. Specifically, this technology seeks to improve the safety and protection of BART patrons, employees and their vehicles while in BART owned and operated parking areas and garages. In the future, BART may also consider use of ALPR for parking lot density and potential fee compliance. The ALPR system would record images of vehicle license plates in BART Parking locations. This technology is currently being used by a wide variety of agencies throughout the State of California for both Law Enforcement functions and parking functions. One of the most notably recognizable uses is by the FasTrak system, by the Bay Area Toll Authority for the purposes of fee collection over toll bridges, toll roads and high occupancy vehicle (HOV) express lanes. San Francisco International Airport (SFO) also uses ALPR technology at parking garages at SFO. The proposed implementation of the ALPR system in BART Parking areas would serve the following key purposes:

Crime Prevention

- Reduce the fear of crime and reassure the public and employees of being able to safely park their car in BART parking facilities, which will result in greater ridership for BART.
- Collect license plate numbers to assist in the identification, apprehension and prosecution of criminal offenders.
- Provide evidential support to prosecute offenders for criminal offenses.
- Provides both riders and employees a means of redress against property crimes, such as burglary and auto theft.

Efficient Parking Program Compliance

- Provides a uniform methodology for the enforcement of BART's parking rules.
- Aids in dispute mediation and provides documentation support for complaint resolution.
- Streamline parking validation.
- Help to increase ridership by determining parking lot density and space availability through and enhance efficient enforcement that parking is available only for BART passengers.
- Allow for the capability to automate parking fee collection in the future.

Location of ALPR and Associated Cameras

The ALPR come in three formats and include Fixed, Mobile or Hand-Held units. Fixed units may be installed in the following locations:

Fixed: Installed in BART owned and/or operated parking facilities, areas and structures.

Mobile: may be installed in the following locations:

On BART Law Enforcement Vehicles

Hand-Held: By Parking Enforcement Officers.

B. Authorized Use

License plate images captured by ALPR shall be used only to advance the BART purposes identified in this section and in Section A of this Policy. Use of the ALPR system and associated cameras will take place 24 hours a day, 7 days per week, and 365 days per year within all San Francisco Bay Area Rapid Transit District parking properties and parking properties owned and operated by BART. The ALPR system shall be used in compliance with the District's Surveillance Ordinance and California Civil Code 1798.90.51 and 1798.90.53. The cameras shall not be used in areas where there is a reasonable expectation of privacy, such as off BART property, and shall not be used to harass, intimidate, or discriminate against any individual or group.

For purposes of this Use Policy, BART purposes include use for BART criminal investigations and to monitor activity to protect against harm to persons and property. It shall be permissible for data collected from the cameras to be used for the following public safety and BART investigation purposes:

- To assist in identifying and preventing crimes against persons and property;
- To locate missing children, adults, and/or elderly individuals, including in response to Amber Alerts and Silver Alerts;
- To assist in identifying, apprehending, and prosecuting criminal offenders;
- To assist in gathering evidence for administrative, civil, and criminal investigations and court actions in accordance with California State Law;
- To help Law Enforcement and Public Safety Personnel respond to emergency events;
- To assist in investigating and resolving staff and customer complaints and/or issues;
- To locate stolen, wanted, and/or other vehicles that are the subject of investigation;
- To locate and/or apprehend individuals subject to arrest warrants.
- To locate victims, witnesses, suspects, and others associated with a law enforcement investigation;
- To support local, state, federal, and regional Law Enforcement departments in the identification of vehicles and drivers associated with criminal investigations, including investigations of serial crimes;
- To protect participants at special events;
- To protect BART Parking Facilities.
- Parking efficiency and enforcement

Administrative functions of ALPR data used for criminal enforcement purposes will be managed by BART and the Northern California Regional Intelligence Center (NCRIC). Any data obtained from ALPR technology shall be used and handled pursuant to this use policy, BART's Surveillance Use Ordinance and applicable State and Federal law.

BART Police shall be permitted to review ALPR Data Images to protect and to respond to law enforcement inquiries, to investigate complaints by customers and employees, and to provide law enforcement authorities with ALPR Data when legally required to do so. All other uses not referenced in this document shall be prohibited. ALPR technology shall not be used for personal or non-law enforcement or parking efficiency purposes and shall adhere to the Surveillance Ordinance.

C. Data Collection

Data collection shall be limited to vehicles entering, exiting and parking on BART owned and operated property. Collection may include information on the vehicle license plate and the image of the vehicle. Routine Data Collection shall not be stored beyond 30 days, except when lawfully required to by subpoena, court order or during an ongoing investigation. Data used to substantiate parking citations will be retained for 5 years to allow time for citation appeal and identification of scofflaws.

D. Data Access

Access to ALPR Data shall be restricted to the following personnel:

- All persons designated by the BART Police Department.
- Designated NCRIC Staff involved in the ALPR Administration.
- BART personnel involved in the operation, installation and maintenance of the ALPR system.
- Customer/Public Access (Restricted per the Surveillance Ordinance in item G)
- Per Court Order or Subpoena, or during an ongoing investigation.
- Office of Independent Police Auditor and Internal Affairs Department
- District Legal Affairs Department
- Authorized BART Service Providers hosting parking efficiency and enforcement applications

E. Data Protection

The data collected by the ALPR system that is used for criminal enforcement purposes will be maintained in a secure manner between the BART Police Department and the NCRIC where physical access is limited to authorized individuals and includes physical access protections and firewalls.

Data used for parking efficiency and enforcement purposes will be separately stored and maintained in a secure location where physical access is limited to authorized individuals and includes physical access protections and/or firewall protections from external intrusion.

All ALPR data shall be maintained in a secure manner and be encrypted via BART's IT encryption requirements from the data source capture through transmission and storage.

Data used for criminal enforcement purposes that is stored in the NCRIC offices in the federal building in San Francisco shall maintain 24/7 staffed security, multiple locked doors requiring both electronic keys and knowledge-based PINs and limit access to active NCRIC employees that also possess a valid security clearance of SECRET or better.

- All activity is logged for audit and tracking purposes. Audits are available for an agency to view the actions of their officers.

F. Data Retention

Staff will adhere to the District's Surveillance Ordinance. All data from the ALPR be collected, retained and stored in accordance with BART Surveillance Ordinance. Data captured from the ALPR and camera system will automatically be downloaded onto a secure data storage system where it will be stored based on the systems' design and recording capabilities before being overwritten by new data; which is thirty (30) days as outlined in section 707.1.5 of BART Surveillance Ordinance. Data shall not be stored beyond 30 days except when lawfully required to by subpoena, court order or during an ongoing investigation. Further a written Memorandum of Agreement with the NCRIC shall specify the retention policy of the ALPR data is only retained for the period as specified by the originating agency (BART). The creation date is automatically tracked for every ALPR data point, and once the lifespan of that point is exceeded, it is removed via automated nightly processes.

Data used to substantiate parking citations will be retained for 5 years to allow time for citation appeal and identification of scofflaws (vehicles with multiple unpaid citations).

G. Public Access

BART shall grant Public access to data collected from the ALPR system per BART Surveillance Ordinance 707.1.8, 707.1.9 only in accordance to California State Law. Information gathered will not be disclosed to the public unless such disclosure is required by law or court order. The BART Police Department is subject to BART's Surveillance Ordinance that has been publicly noticed and approved by the BART Board. ALPR Data Collection will be monitored by BART Police as well as be subject to Police Internal Affairs and State Auditors to ensure the security of information and compliance with applicable privacy laws.

Such data will not otherwise be disclosed/released by the BART Police Department without the consent of the Chief of Police and District Legal. If an ALPR operator is required to provide access to ALPR information, the ALPR operator shall do the following:

- (a) Maintain a record of that access. At a minimum, the record shall include the following:
 - (1) The date and time the information is accessed.
 - (2) The license plate number or other data elements used to query the ALPR system.

- (3) The username of the person who accesses the information, and, as applicable, the organization or entity with whom the person is affiliated.
- (4) The purpose for accessing the information.
- (b) Require that ALPR information only be used for the authorized purposes described in the usage and privacy policy.
 - (1) Indicate the authorized use; such as for criminal investigation.

707.1.8 RELEASE OF ALPR DATA TO THE GENERAL PUBLIC

All ALPR Data shall be used by law enforcement for public safety, security, and parking efficiency/enforcement purposes only; except as required by law, subpoenas or other court process, such data will not otherwise be disclosed/released by the BART Police Department without the consent of the Chief of Police and District Legal.

Department employees shall not release any information, including capabilities regarding the District's ALPR systems to the public without prior authorization from the Chief of Police, or District Legal.

707.1.9 REQUESTS FOR VIDEO IMAGES FROM THE MEMBERS OF THE PUBLIC

Persons that have a subpoena or preservation letter, and are interested in requesting ALPR, shall be directed to the Department's Records Division during normal business hours, or via fax at 510- 464-7089 for consideration of their request. Records shall consult with the Chief of Police and District Legal Prior to any approval of release.

Persons that do not have a subpoena or preservation letter and are interested in requesting ALPR Data are to be directed to the District Secretary's Office for review by District Legal at 510-464-6080 or via fax at 510-464-6011.

H. Third Party Data Sharing

BART shall maintain robust security procedures and practices, including operational, administrative, technical, and physical safeguards, to protect ALPR information from unauthorized access, destruction, use, modification, or disclosure. The Administrator of the data collection will not share information with ICE or any agency conducting immigration enforcement or removal operations. Information is only shared with other law enforcement possessing a need and legal right to know, including the following:

- In response to subpoenas
- Pursuant to a Court Order
- Request by Law Enforcement Agencies for active Criminal Investigations
- In accordance with all applicable California State law

BART will retain all ownership rights to the data. Private vendors cannot share the data unless directed to by BART in writing and in accordance with this policy, and will forward any subpoena requests for the data to BART.

Notwithstanding any other law or regulation:

(a) A public agency such as BART that operates or intends to operate an ALPR system shall provide an opportunity for public comment at a regularly scheduled public meeting of the governing body of the public agency before implementing the program. BART shall present this Impact and Use document to the BART Board of Directors and provide notice to the public in accordance with BART's Surveillance Ordinance. BART Police Department shall also conduct outreach with privacy groups to address any privacy concerns that may be raised.

(b) A public agency shall not sell, share, or transfer ALPR information, except to another public agency, and only as otherwise permitted by law. For purposes of this section, the provision of data hosting or towing services shall not be considered the sale, sharing, or transferring of ALPR information.

I. Training

Training for BART's ALPR system will be provided by BART internal staff and by ALPR service providers and the NCRIC. Training will consist of ALPR operation, installation, data protection and administration of the ALPR System and ALPR Data. Technical training will be both hands on and via electronic instruction.

J. Auditing and Oversight

The BART Police Department shall oversee the BART ALPR System and data retention to ensure compliance with the Surveillance Ordinance. Additionally, both BART Police will require the management of the system to be open for administrative auditors to ensure the Surveillance Ordinance and California State Laws are adhered. The audit process shall ensure that no misuse of the system or parts of the system occurs. Additionally, a secondary check with the reporting agency will be required by BART Police to adjudicate all crimes prior to taking enforcement action on crimes that are not a crime in progress or otherwise present exigent circumstances.

Personnel who are authorized to have access to the system shall be designated in writing and the designation shall ensure that their access to and use of the data complies with the Ordinance.

A log shall be maintained that records when access to ALPR data is requested. This shall include the date, time, data record accessed, and staff member involved. The log shall be available for presentation for all required audits.

Surveillance Impact Report BART Automated License Plate Recognition (ALPR)

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A. Information describing the proposed surveillance technology and how it generally works.

Automated License Plate Recognition (ALPR) systems are camera technologies that can capture vehicle license plate images and a portion of the vehicle. This technology will be used for the safety and security of patrons and employees and protection of their vehicles while using BART owned and operated parking facilities.

ALPR systems may include Fixed visible, mounted technologies. Mobile scan options include mobile units which can be mounted to a police car. Future use may include hand held options and mobile units may be considered parking program enforcement by roving parking enforcement officers.

ALPR technology increases law enforcement’s ability to recover lost/stolen property and provide evidentiary support for criminal prosecution. In 2012 the RAND Corporation conducted a study on ALPR Technologies across the United States and found that ALPR was responsible for increasing Stolen Vehicle recovery by 50%. (RAND, Safety and Justice Program; *ALPR for Law Enforcement Opportunities and Obstacles*).

Currently, the ability for BART police to solve crimes such as auto burglaries and thefts is greatly reduced due to a lack of video evidence. ALPR technologies records images of a vehicle’s license plate. The image, when compared against a hot list provides information that the vehicle may have been used in a crime. This information often leads to a timelier ability to capture offenders. Accurate information provided to BART Police will increase the ability to successfully prosecute offenders and greatly increase the chances of returning stolen property to the victim.

B. Information on the proposed purpose(s) for the surveillance technology.

Implementation of the proposed BART ALPR technology system would serve the following key purposes:

- Aid in the recovery of lost or stolen vehicles.
- Prevent, deter and detect crime, damage to patron and employee vehicles.
- Reduce crime and in doing so, reassure the public and employees using BART owned and operated Parking Facilities.
- Assist in the monitoring, identification, apprehension and prosecution for criminal offenses.
- Aid in the Investigation of complaints or offenses and provide evidentiary support upon which to take criminal and civil penalty actions.
- Parking efficiency and enforcement

C. Recommendation for Fixed Reader Installations location(s), to be deployed, based on current statistics for Auto Theft and Auto Burglary.

- A10 – Lake Merritt 5/2 Low Priority Installation
- A20 – Fruitvale 26/16 Priority Installation
- A30 – Coliseum 21/23 Priority Installation
- A40 - San Leandro 21/17 Priority Installation
- A50 - Bay Fair 24/9 Priority Installation
- A60 – Hayward 21/21 Priority Installation
- A70 – South Hayward 17/16 Priority Installation
- A80 – Union City 10/3 Low Priority Installation
- A90 – Fremont 9/5 Low Priority Installation
- L10 - Castro Valley 1/9 Low Priority Installation
- L20 - West Dublin 5/3 Low Priority Installation
- L30 - Dublin / Pleasanton 18/8 Priority Installation
- K10 – 12th Street 0/0 N/A
- K20 – 19th Street 8/4 Low Priority Installation
- K30 – MacArthur 3/2 Low Priority Installation
- R10 – Ashby 4/5 Low Priority Installation
- R20 – Berkeley 0/0 N/A
- R30 – North Berkeley 4/11 Priority Installation
- R40 – El Cerrito Plaza 4/5 Low Priority Installation
- R50 – El Cerrito Del Norte 15/14 Priority Installation
- R60 – Richmond 9/22 Priority Installation
- C10 – Rockridge 6/4 Low Priority Installation
- C20 – Orinda 5/7 Low Priority Installation
- C30 – Lafayette 4/2 Low Priority Installation
- C40 – Walnut Creek 1/4 Low Priority Installation
- C50 – Pleasant Hill 5/4 Low Priority Installation
- C60 – Concord 16/10 Priority Installation
- C70 – North Concord 18/14 Priority Installation
- C80 – Pittsburg Pay Point 27/13 Priority Installation
- M10 – West Oakland 20/9 Priority Installation
- M16 – Embarcadero 0/0 N/A
- M 30 – Powell 0/0 N/A
- M 20 – Montgomery 0/0 N/A
- M 40 – Civic Center 0/0 N/A
- M 50 – 16th Street 0/0 N/A
- M60 – 24th Street 0/0 N/A
- M70 – Glen Park 0/0 N/A
- M80 – Balboa Park 0/0 N/A
- M 90 – Daly City 13/13 Priority Installation

- W10 – Colma 1/3 Low Priority Installation
- W20 – South SF 1/0 Low Priority Installation
- W30 – San Bruno 0/1 Low Priority Installation
- W40 – Millbrae 2/1 Low Priority Installation
- Y10 – SFO 0/0 N/A
- S10 – Irvington (Future) 0/0 TBD
- S 20 – Warm Springs 1/7 Low Priority Installation
- S 40 – Milpitas 0/0 TBD
- S 50 – Berryessa 0/0 TBD
- E 20 – Pittsburg Center 0/0 Low Priority Installation by Operating Contractor
- E 30 – Antioch 0/12 Priority Installation by Operating Contractor
- Hercules Park-and-Ride
- Isabel (Livermore) Park-and-Ride
- Laughlin (Livermore) (Park-and-Ride)
- Irvington (Fremont) (future station)
- All future BART station parking facilities, either owned, operated and/or managed by BART and intended for BART passengers.

A. Crime statistics used to determine location installation, to deter or detect crime.

Statistics on Auto Burglary Auto Theft and Catalytic Converter Theft were used to provide recommended priority installations. The proposed implementation of the ALPR System is part of an overall Districtwide security system with functions for crime deterrence and detection, as well as future considerations for a more efficient parking program enforcement through automation. The proposed ALPR system would target hot spots crime areas as identified by the Crime Analysis Unit. Additionally, statistics were used to outline the problem expressed by BART Riders. Numbers for Auto Burglary, Auto Theft and Catalytic Converter Theft were analyzed for 2018 through March of 2019. The cost benefit analysis below was used in part to determine the viability of this technology.

Current Annual Crime Statistics	2018	2019 (March)	15 Month Average
Auto Burglary:	198	264	231
Auto Theft:	102	43	145
Catalytic Converter Theft:	205	51	128

Cost Benefit Analysis	Cost to BART Riders	
Auto Burglary: (Average Deductible and Property)	\$1,000 x 231 cases annually =	\$231,000
Auto Theft: (No comprehensive Insurance)	\$15,000 x 145 cases annually =	\$2,175,000
Catalytic Converter Theft: (Average cost w/labor)	\$1,500 X 128 cases annually =	\$192,000
	Total Loss for 15 Months	\$2,598,000

Approximate cost of a fixed ALP Reader is between \$15,000 to \$22,000 per installed unit, for 16 Priority Installations total cost \$352,000 for one ALPR at all recommended parking areas.

B. An assessment identifying any potential impact on privacy rights and discussing any plans to safeguard the rights of the public.

Data collection by the ALPR System includes information found on the vehicle license plate. BART recognizes that all people have an inalienable right to privacy and BART is committed to protecting and safeguarding this right.

In 2013, data experts introduced to the public the concept of “meta data”, which detailed that larger data can be gathered from individual data points. A recent example included, that by using a simple homemade app that captured simple data points such as phone number called, and time of day, Stanford lawyer and computer scientist Jonathan Mayer was able to accurately identify 80% of the volunteers in his study, using only open source databases such as Yelp, Facebook, and Google. Among the many individuals he identified, he successfully identified a woman that had an abortion, another woman that had cancer, and a man collecting guns and growing marijuana in his home.

Today, data scientists can accurately identify over 95% of individuals based solely on 4 geospatial (time, location) “meta data” points. Human are creatures of habit, typically driving the same way to work, our house of worship, and our neighborhood grocery store. Current attempts to “de-identify” or anonymize data are insufficient, due to modern day computing power and the sheer collection of data points available from public and private sources. License plate scans are collected by both public and private parties, and often shared via large commingled databases accessible by a simple subscription service.

In recognition of these concerns, BART has taken the following steps to mitigate the potential risk inherent in collecting this data from its customers.

As discussed in this Report and the Surveillance Use Policy, only authorized BART personnel, authorized NCRIC personnel or outside law enforcement pursuant to a court order or subpoena, will have access to this data for the purposes identified in this report and in the Surveillance Use Policy. BART and NCRIC shall maintain robust security procedures and practices, including multi layered engineering and administrative protections with the following details: CARD access locked doors with restricted and approved access only for designated personnel. Restricted Administrative rights to data access to provide operational, administrative, technical, and physical safeguards, to protect ALPR information from unauthorized access, destruction, use, modification, or disclosure. BART and NCRIC shall not provide data to federal immigration agencies. Data shall not be stored beyond 30 days, unless lawfully required by subpoena, court order or during an ongoing investigation.

C. The fiscal costs for the surveillance technology, including initial purchase, personnel and other ongoing costs, and any current or potential sources of funding.

Initial Purchase Cost

Based on an estimated budget, the cost is approximately \$15,000 to \$22,000 per installed ALPR unit. Costs for ALPR mobile units for enforcement vehicles would be approximately \$20,000 per vehicle.

Personnel Costs

BART personnel could provide installation for the ALPR System, which is estimated to be approximately \$100,000 at normal BART labor rates. However, depending upon the complexity of the installation and the availability of BART labor, the ALPR vendor may also provide ALPR installation at significant cost savings to BART when negotiated into the ALPR purchase contract.

Ongoing Costs

The ongoing costs associated with the deployment of a systemwide ALPR System will be primarily preventative and corrective maintenance costs. There may also be an annual leasing software for the ALPR units used for parking enforcement, depending upon contract details, which is estimated initially to be about \$200,000 annually.

The anticipated lifespan of the ALPR system is about ten (10) years. However, with proper maintenance staff, anticipates the useful operational lifespan of the system could be extended.

Potential Sources of Funding

- FTA Security Grant
- Operating Funds
- FEMA Grants
- Bonds
- Parking Fee Revenue

D. 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.

Yes, third party in the way of vendor support may require the use of log files and sample image data to be collected for analysis of errors and system malfunctions. The data is not stored after any maintenance or trouble shooting is complete.

The Northern California Regional Intelligence Center (NCRIC) will be the handling center for the captured data that will be accessed by BART Police for law enforcement investigative purposes.

Data used for parking enforcement purposes may be shared with authorized BART Service Providers hosting parking efficiency and enforcement applications.

E. A summary of alternative methods (whether involving the use of a new technology or not) considered before deciding to use the proposed surveillance technology, including the costs and benefits associated with each alternative and an explanation of the reasons why each alternative is inadequate or undesirable.

BART examined the current capabilities for preventing and deterring auto burglary and auto. The current law enforcement system uses manpower to physically verify a crime in progress and conduct investigations. The current system is both labor intensive and not highly effective for preventing or deterring auto crimes. As parking lots continue to expand beyond the 47,000 parking spaces, enforcement actions are not able to keep pace with the criminal activity in these new locations. Currently the enforcement actions are limited to observing a crime in progress and catching criminal activity in the parking areas. Statistics from Federal and State Criminal Apprehensions indicate that more than 70% of crimes are committed by people using vehicles. There is currently no method for vehicles entering BART parking areas to be identified. Without this technology, identification of vehicles and associated criminals' activity is limited to observing crime in progress or limited investigative recovery. There is no alternative technology that can meet the needs of the District. The benefits and disadvantages of ALPR are:

Benefits of ALPR

- Improves public safety and security.
- Gives BART Riders using BART Parking Facilities a redress for crimes against their persons and property.
- Provides documentary evidence for prosecution.
- Enhances public confidence when Parking at BART.
- Offers low maintenance operating costs.
- Requires minimal training of personnel on the use of the technology.

Disadvantages of ALPR

- Requires initial installation investment, although recoverable within a few years' time.
- Must be protected from vandalism.
- Privacy risk to customers that use BART Parking Facilities from the collection of their locational data.

F. A summary of the experience, if any is known, other law enforcement entities have had with the proposed technology, including information about the effectiveness, any known adverse information about the technology such as unanticipated costs, failures, civil rights or civil liberties issues.

Many other Agencies, including a robust number of Law Enforcement Agencies use ALPR Systems throughout California and the Nation. ALPR System Efficiencies are 98% with a correct Read Rate of 95% resulting in high validity of documentation of incidents. Highly effective read rates protect individuals and civil liberties by ensuring proper, correct capturing of information.

BART would require Annual Certification of the System conducted by third party calibration service parties will ensure the system is maintained at factory read rates.

- California Highway Patrol and multiple County and City LE Agencies use ALPR Technologies for law enforcement function.
- SFMTA Uses ALPR Technologies.
- California State Universities including UC Berkley, Hayward and Merced use ALPR Technologies.
- CALTRANS uses ALPR Technologies for all Bridges, and Tolls via FasTrak which has been widely well received by the Public, with specific positive comments for FasTrak Fare collection and ease of use.
- San Francisco International Airport uses ALPR Technologies using FasTrak to pay for parking at airport lots.

Adverse information on ALPR Technology includes:

- ALPR can be fooled using false plates. Although if reported, this would show as a stolen plate in the ALPR System.
- ALPR System Data must be maintained, failure to do so could reflect old records in the system. It is imperative the agency (BART Police Department) implement a secondary verification procedure for all non-exigent or crimes in progress.
- Some individuals and privacy groups do not like the use of ALPR by law enforcement, because they feel it is an infringement of their privacy. ALPR Technologies record all license plates; including those that have not committed offences or infractions in addition to those that have.
- ALPR has a 95 percent correct read rate which means it also has a 5 percent incorrect read rate. This can be best managed by ensuring a robust policy on acceptable ALPR reads and secondary verification for non-crimes in progress.
- Inaccurate data in the system or inaccurate scans can lead to civil rights abuses. In 2015, the taxpayers of San Francisco paid \$495,000 to Denise Green, a 45-year-old Muni driver after police officers pulled her over at gunpoint based on an erroneous alert from their system – the scan was off by one digit, and officers failed to verify its accuracy.

It is important to note that when used properly and judicially along with proper oversight and with written policies in place, ALPR can greatly enhance the safety and security of all personnel using BART owned and operated parking facilities. The State of California has the largest concentration of Agencies using ALPR, followed by New York and Florida. Enclosed below is a direct link to other California Agencies ALPR Use Policies.

- **Central Marin Police Authority**
- **City and County of San Francisco**
- **City of Alameda**
- **City of Alhambra**
- **City of American Canyon**
- **City of Anaheim**
- **City of Antioch**
- **City of Arcadia**
- **City of Arcata**
- **City of Atherton**
- **City of Auburn**
- **City of Avenal**
- **City of Azusa**
- **City of Bakersfield**
- **City of Beaumont**
- **City of Bell**
- **City of Bell Gardens**
- **City of Berkeley**
- **City of Belvedere**
- **City of Beverly Hills**
- **City of Brawley**
- **City of Brea**
- **City of Brentwood**
- **City of Brisbane**
- **City of Buena Park**
- **City of Burbank**
- **City of Burlingame**
- **City of Campbell**
- **City of Carlsbad**
- **City of Chico**
- **City of Chino**
- **City of Chula Vista**
- **City of Claremont**
- **City of Clayton**
- **City of Clovis**
- **City of Concord**
- **City of Corning**
- **City of Corona**
- **City of Coronado**
- **City of Covina**
- **City of Culver City**
- **City of Cypress**

- City of Daly City
- City of Davis
- City of Dublin
- City of El Cajon
- City of El Centro
- City of Elk Grove
- City of Emeryville
- City of Escondido
- City of Fairfield
- City of Folsom
- City of Fontana
- City of Fountain Valley
- City of Fremont
- City of Fresno
- City of Fullerton
- City of Galt
- City of Gardena
- City of Glendale
- City of Glendora
- City of Hanford
- City of Hawthorne
- City of Hayward
- City of Huntington Beach
- City of Imperial
- City of Inglewood
- City of Irvine
- City of Irwindale
- City of La Habra
- City of La Mesa
- City of La Palma
- City of La Verne
- City of Laguna Beach
- City of Lemoore
- City of Livermore
- City of Lodi
- City of Long Beach
- City of Los Alamitos
- City of Los Altos
- City of Los Gatos
- City of Madera
- City of Manhattan Beach
- City of Manteca
- City of Menlo Park

- City of Milpitas
- City of Modesto
- City of Monrovia
- City of Monte Sereno
- City of Morgan Hill
- City of Montclair
- City of Montebello
- City of Monterey Park
- City of Moraga
- City of Mountain View
- City of Murrieta
- City of National City
- City of Newark
- City of Newport Beach
- City of Novato
- City of Oakland
- City of Oceanside
- City of Oxnard
- City of Pacifica
- City of Palo Alto
- City of Palos Verdes Estates
- City of Pasadena
- City of Petaluma
- City of Piedmont
- City of Pismo Beach
- City of Pittsburgh
- City of Placentia
- City of Placerville
- City of Pleasant Hill
- City of Red Bluff
- City of Redlands
- City of Redwood City
- City of Richmond
- City of Ripon
- City of Riverside
- City of Sacramento
- City of San Bernardino
- City of San Bruno
- City of San Diego
- City of San Fernando
- City of San Gabriel
- City of San Jose
- City of San Leandro

- City of San Luis Obispo
- City of San Marino
- City of San Mateo
- City of San Pablo
- City of San Rafael
- City of San Ramon
- City of Santa Clara
- City of Santa Monica
- City of Sausalito
- City of Seal Beach
- City of Sierra Madre
- City of Signal Hill
- City of Simi Valley
- City of South Beach
- City of South Gate
- City of South San Francisco
- City of Suisun City
- City of Sunnyvale
- City of Torrance
- City of Tulare
- City of Tustin
- City of Ukiah
- City of Upland
- City of Vallejo
- City of Vernon
- City of Visalia
- City of Walnut
- City of Walnut Creek
- City of West Covina
- City of West Sacramento
- City of Westminster
- City of Westmoreland
- City of Whittier
- City of Woodland
- County of Alameda
- County of Contra Costa
- County of Fresno
- County of Los Angeles
- County of Marin
- County of Orange
- County of Riverside
- County of Sacramento (Sheriff)
- County of Sacramento (Department of Human Assistance)

- **County of San Bernadino**
- **County of San Diego**
- **County of San Luis Obispo**
- **County of San Mateo**
- **County of Santa Clara**
- **County of Shasta**
- **County of Solano**
- **County of Ventura**
- **County of Yolo**
- **California State University, Long Beach**
- **Kensington Police Protection and Community Services District**
- **Port of San Diego**
- **Town of Hillsborough**
- **Town of Los Gatos**
- **Town of Portola Valley**
- **Town of Tiburon**
- **University of California - Merced**

In conclusion, ALPR Technologies can offer greater safety and security for BART patrons and employees using BART Parking Facilities. Patrons will have an improved safety and security when parking at BART.