

**From:** [Jp Massar](#)  
**To:** [City Clerk](#)  
**Cc:** [JP Massar](#); [Mike Katz-Lacabe](#)  
**Subject:** PUBLIC COMMENTS AGENDA ITEM No. 6 (12/18/23)  
**Date:** Monday, December 18, 2023 9:48:50 AM

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From: Oakland Privacy.

Oakland Privacy is a citizen's coalition that works regionally to defend the right to privacy, enhance public transparency, and increase oversight of law enforcement, particularly regarding the use of surveillance techniques and equipment.

We write to you concerning your surveillance technology expansion proposal on your 12/18 consent agenda, Item 6. In particular, the proposed Automatic License Plate Reader (ALPR) expansion, and with respect to that, the use policy San Pablo has adopted for its ALPR use ([https://www.sanpabloca.gov/DocumentCenter/View/11559/Automated\\_License\\_Plate\\_Readers\\_\\_ALPRs-Policy](https://www.sanpabloca.gov/DocumentCenter/View/11559/Automated_License_Plate_Readers__ALPRs-Policy))

That use policy says (462.4) ALPR data not involved in an investigation is to be "stored for a minimum of one year."

This is far beyond what many Bay Area municipalities allow, and in consideration of the civil liberties implications of retaining such a large amount of data as you will be collecting with your newly-expanded ALPR network, we would strongly urge you to alter your use policy to a now-broadly-accepted 30 days MAXIMUM.

Bay Area cities which currently implement a 30-day maximum retention period include Richmond (C.f. [www.ci.richmond.ca.us/DocumentCenter/View/67365/Richmond-Police-Department-Policy\\_2023?bidId=](http://www.ci.richmond.ca.us/DocumentCenter/View/67365/Richmond-Police-Department-Policy_2023?bidId=), Policy 433, Section 433.6) Oakland (C.f. <https://www.kron4.com/news/bay-area/oakland-commission-backs-use-of-automatic-license-plate-reader-system/> "The new policy would limit data retention... to 30 days"), Vallejo, Hercules, Benecia, Alameda, Fairfield, Foster City, San Mateo and Vallejo.

Thank you for your consideration.

JP Massar  
Mike Katz-Lacabe

Members of, and on behalf of, Oakland Privacy

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