

January 10, 2024

LORI KLETZER

Campus Provost and Executive Vice Chancellor

Re: Proposed Campus Policy on Automated License Plate Readers

Dear Lori,

The Academic Senate has reviewed the Division of Finance, Operations, and Administrations proposal for a new policy on Automated License Plate Readers (ALPR) intended to coincide with the planned Transportation and Parking Services (TAPS) implementation of automated license reader technology in summer 2024. Our committees on Information Technology (CIT) and Research (COR) responded. The Senate welcomes the opportunity to provide feedback on this far-reaching project. However, our responding committee raised the following concerns about the lack of justification for adoption of ALPR technology.

The Academic Senate could imagine possibly acceptable and even positive ALPR implementations on campus. For example, many of the stated goals of the ALPR program can be accomplished without reading and storing license plate information. Counting cars or implementing systems that trigger on recognition of previously-identified license plate numbers (rather than reading and storing all license plates) would require advanced planning, but would limit the risk of abuse. However, it is difficult to evaluate the proposed policy without adequate information about the context of that policy, including:

Why UCSC will be adopting ALPR technology

- What are the anticipated benefits for the campus community?
- What are the anticipated efficiency gains and cost savings for TAPS?
- How do safety and law enforcement uses of the ALPR data fit into the rationale for ALPR adoption?

What ALPR hardware and software will be used

- What are the number and nature of the proposed ALPR cameras (fixed, mobile mounted on safety officer vehicles, mobile mounted on TAPS vehicles) and the approximate distribution of the fixed cameras on campus (e.g. campus entrances, key intersections, parking lot entrances and exits)?
- What is the field of view initially captured by the cameras, and in the stored images? What, if any, image cropping, blurring, or other processing will be applied prior to storage?
- Where will the ALPR data be stored, and who will have access to ALPR data?
- How will the ALPR system address use cases like medical permit space parking, loading areas, and drop-off areas?

How ALPR information will be used

- The UC Artificial Intelligence (AI) Working Group Final Report¹ identifies three application areas of AI in policing: deterrence, prevention, and investigation. Which of these applications are anticipated at UCSC, and what current processes and policies will ALPR technology enhance or replace?
- To what extent will user data be anonymized for each application? (For an example policy, see the Northern California Regional Intelligence Center (NCRIC) Automated License Plate Reader Policy.)²
- How will UCSC distinguish between license plate information captured by the ALPR and personal identifying information of drivers and/or passengers in the vehicle?
 - The text referencing “detection of a vehicle (or person associated with that vehicle)” is concerning. Does this imply that the ALPRs would also incorporate some form of facial recognition? If so then this represents a significantly larger security and privacy issue.
- What transparency will there be for data requests from non-TAPS campus entities for "verified business needs"?
- What quality controls and audit procedures will be implemented as part of the ALPR policy?

The absence of compelling arguments for adoption of ALPR at UCSC is concerning, given the potential social costs. CIT identified the following:

- Loss of individual privacy, and increased vulnerability to misuse of personal information³
- Disproportionate negative impact from ALPR utilization, including actual or perceived targeting of undocumented students and members of minoritized groups
- Chilling of free speech and labor related activity on campus
- Deterioration of campus perceptions of UCSC Police (safety officers) and administrators⁴

CIT recommended that further clarity on these points be articulated before TAPS moves forward with the ALPR implementation plan. Given the lack of specificity in the policy, and the overall lack of rationale for the utility of ALPR technology, the Academic Senate believes that a delay to address these concerns is warranted. COR feels that the use of ALPRs on our campus presents both privacy and information security concerns and could discourage visitors to campus who are essential for a vibrant research environment. Although we understand that a predetermined

¹ “Responsible Artificial Intelligence, Recommendations to Guide the University of California’s Artificial Intelligence Strategy”. October 2021. https://www.ucop.edu/uc-health/_files/uc-ai-working-group-final-report.pdf. Information about the UC Presidential Working Group on Artificial Intelligence is available at <https://www.ucop.edu/ethics-compliance-audit-services/compliance/presidential-working-group-on-artificial-intelligence.html>.

² Northern California Regional Intelligence Center (NCRIC) Automated License Plate Reader Policy. <https://ncric.org/html/NCRIC%20ALPR%20POLICY.pdf>

³ See the Northern California Regional Intelligence Center's Initial Privacy Impact Assessment for Automated License Plate Reader Technology. <https://ncric.org/html/NCRIC%20ALPR%20PIA.PDF>. Information about NCRIC is available at <https://ncric.ca.gov/ncric/>

⁴ “See the Auditor of the State of California's report "Automated License Plate Readers. To Better Protect Individuals’ Privacy, Law Enforcement Must Increase Its Safeguards for the Data It Collects”, February 2020. <https://www.auditor.ca.gov/pdfs/reports/2019-118.pdf>

schedule may dictate the deployment of ALPR technology, our campus policies and practices on the use of these technologies should be informed by campus values.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Gallagher", with a long horizontal flourish extending to the right.

Patty Gallagher
Chair, Academic Senate

cc: Diane Lallemand, Director, Administrative Policy & Records
Alexander Sher, Chair, Committee on Faculty Welfare
Zac Zimmer, Chair, Committee on Information Technology
Michael Hance, Chair, Committee on Research
Raphael Kudela, Chair, Committee on Planning and Budget
Matthew Mednick, Executive Director, Academic Senate