

**Springfield Police Department**  
**Memorandum to City Manager Regarding ALPR**

**Executive Summary**

The Springfield Police Department has initiated the deployment of a network of 25 Automated License Plate Recognition (ALPR) cameras throughout the city. These cameras are strategically placed to cover major ingress and egress routes and high-traffic commercial areas, not residential zones or paths that would allow continuous tracking of individual travel. This network was developed to address growing public safety concerns, particularly the rise in Organized Retail Theft, and aligns with regional and statewide efforts. Funding for this program was obtained through the Criminal Justice Commission and was reviewed and approved through the formal grant modification process.

Springfield's ALPR program includes internal policies that control access to and use of the data. All data collected by the cameras remains owned by the City of Springfield. The vendor, Flock Safety, cannot share or sell data to any outside agency or private party without explicit approval. The data is encrypted in transit and at rest, stored securely in AWS GovCloud, and permanently deleted after 30 days. There is no linkage between plate captures and any DMV or personal identifying databases within the Flock system.

Concerns raised by community members have been reviewed and addressed in detail. The system is not capable of capturing biometric information, tracking human movement, or performing facial recognition. Searches conducted within the system are fully logged and audited annually per policy. Community privacy is protected through both the physical placement of cameras and the technical safeguards of the system. Additional questions regarding federal access, misuse, data security, and civil rights impacts are addressed in this memo, with real-world legal precedent and vendor transparency practices cited for assurance.

The program represents a focused, balanced approach to enhancing safety while preserving civil liberties, and it reflects Springfield's ongoing commitment to transparency, data stewardship, and community trust.

## **Flock Deployment Information**

### **Springfield Police Department**

Number of Cameras: 25

Primary Objective of Cameras: Capture ingress and egress points of travel into and out of the City of Springfield as well as high-traffic commerce areas to assist in investigating retail theft.

Locations of Cameras:

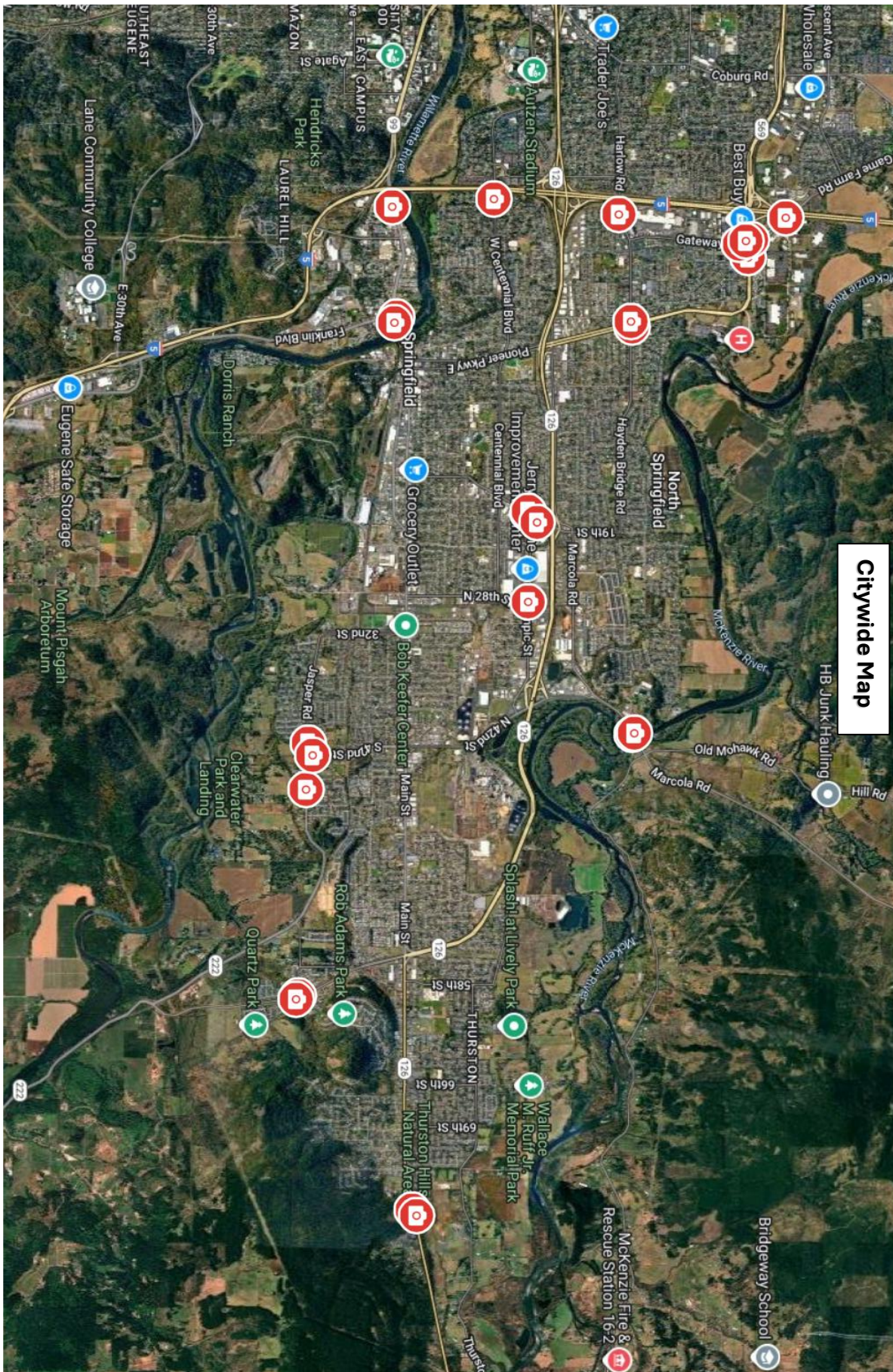
Mckenzie Hwy WB @75 <sup>th</sup> St	WB
S 42nd NB @ Jasper Rd	NB
Mohawk Blvd @ Olympic St	SB
S A St @ Franklin Blvd	EB
Main St @ Franklin Blvd	WB
W Centennial EB @ Anderson Ln	EB
Harlow Rd EB @ Dornoch St	EB
Gateway SB @ International Way	SB
Marcola Rd @ Hayden Bridge Rd	WB
Marcola Rd @ Hayden Bridge Rd	EB
Mckenzie Hwy EB @ 75 <sup>th</sup> St	EB
Bob Straub Pkwy @ Mt Vernon	SB
Bob Straub Pkwy @ Mt Vernon	NB
Jasper Rd @ S 42 <sup>nd</sup> St	WB
Gateway St @ Kruse Way	NB
Gateway St @ Beltline Rd	SB
Jasper Rd @ S 42 <sup>nd</sup> St	EB
Beltline Rd @ Hutton St	EB
Franklin Blvd @ Jenkins Dr	EB
Beltline Rd @ Gateway St	WB
Olympic St @ 28 <sup>th</sup> St	WB
Olympic St @ Mohawk Blvd	EB
Pioneer Parkway @ Hayden Bridge Way	SB
Pioneer Parkway @ Hayden Bridge Way	NB
18th St @ Mohawk Blvd	NB

Highlighted cameras indicate pending installation due to unforeseen circumstances

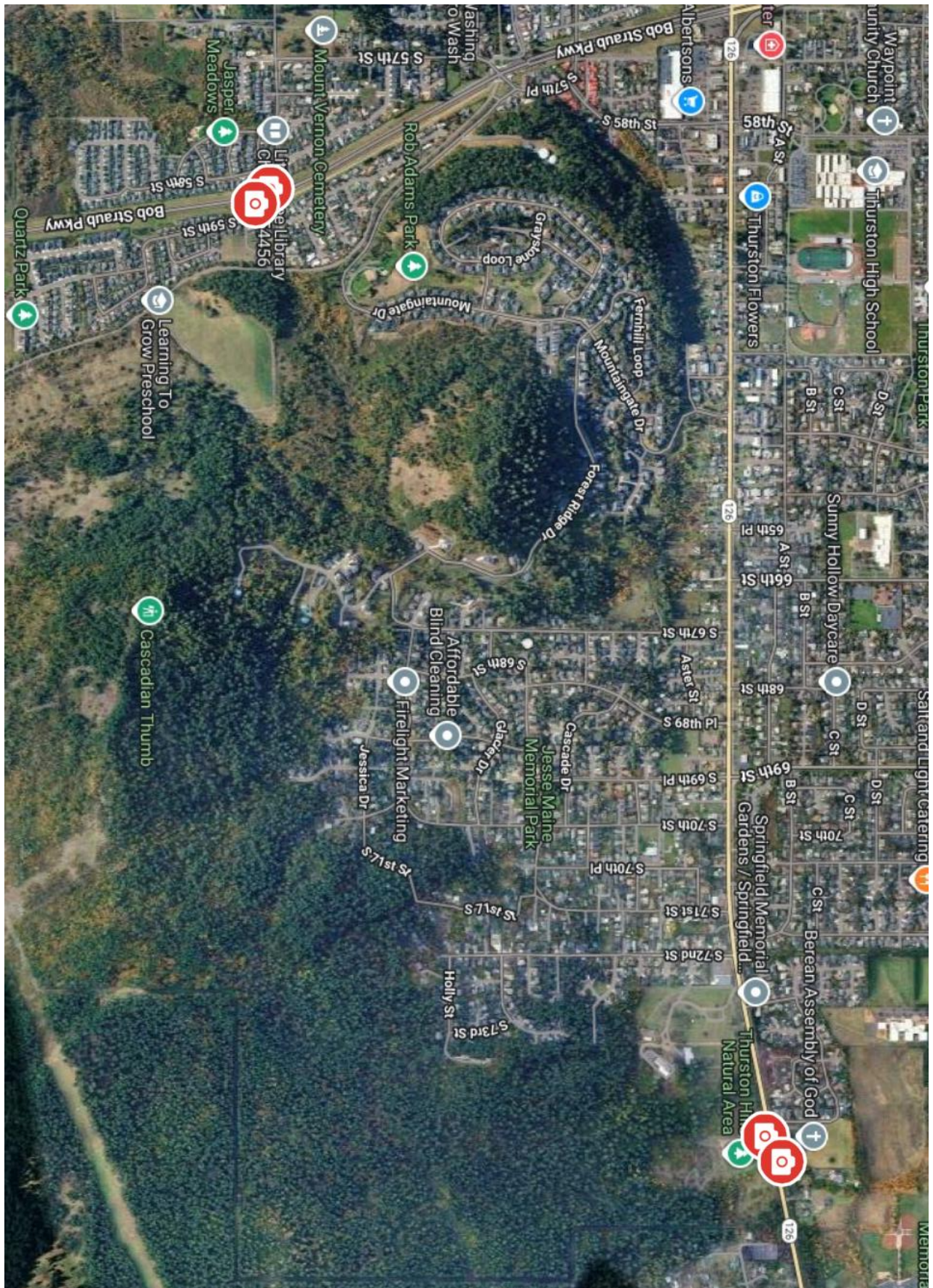
Red font indicates that the devices have been damaged or destroyed since installation

## **Flock Device Maps**

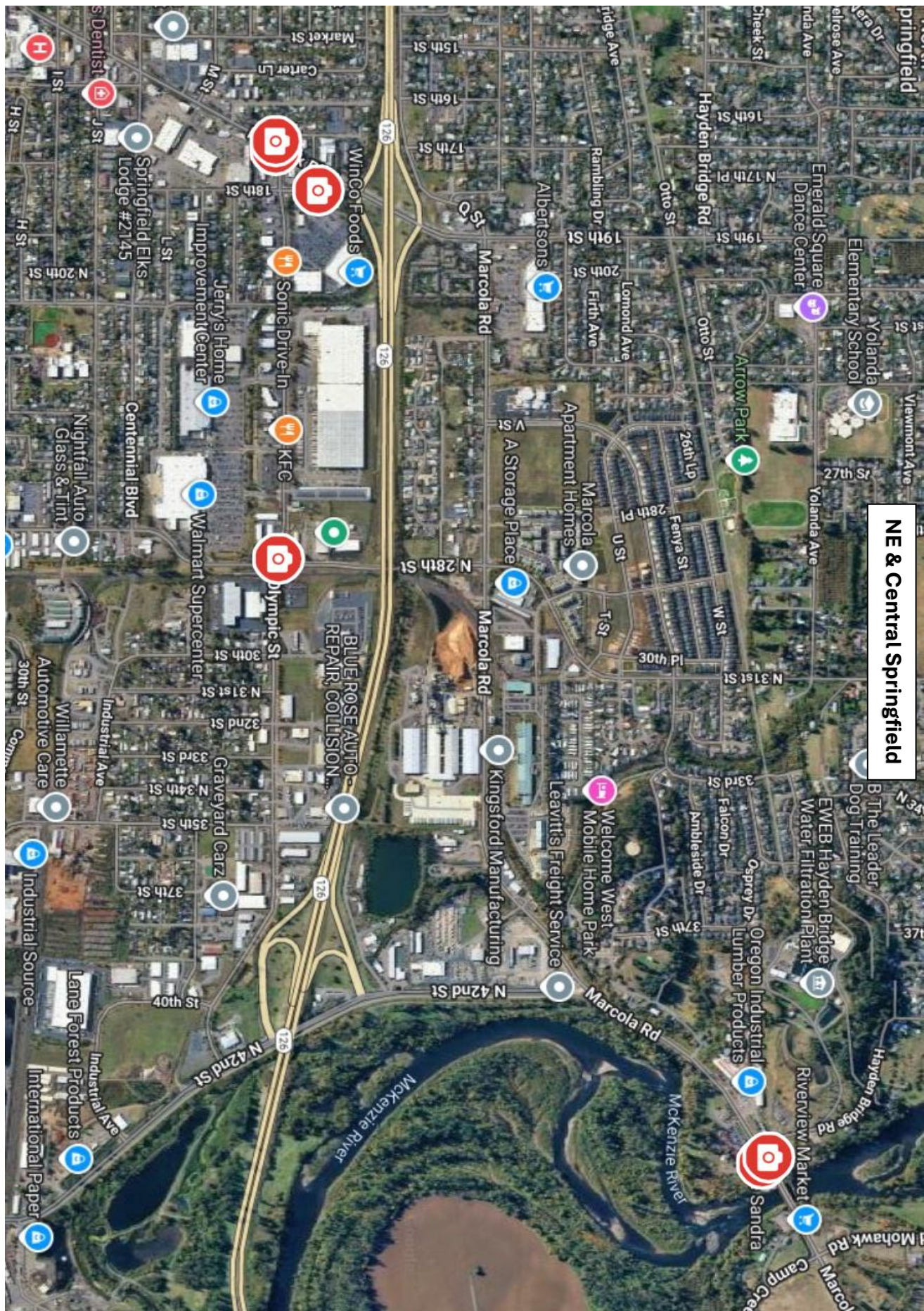






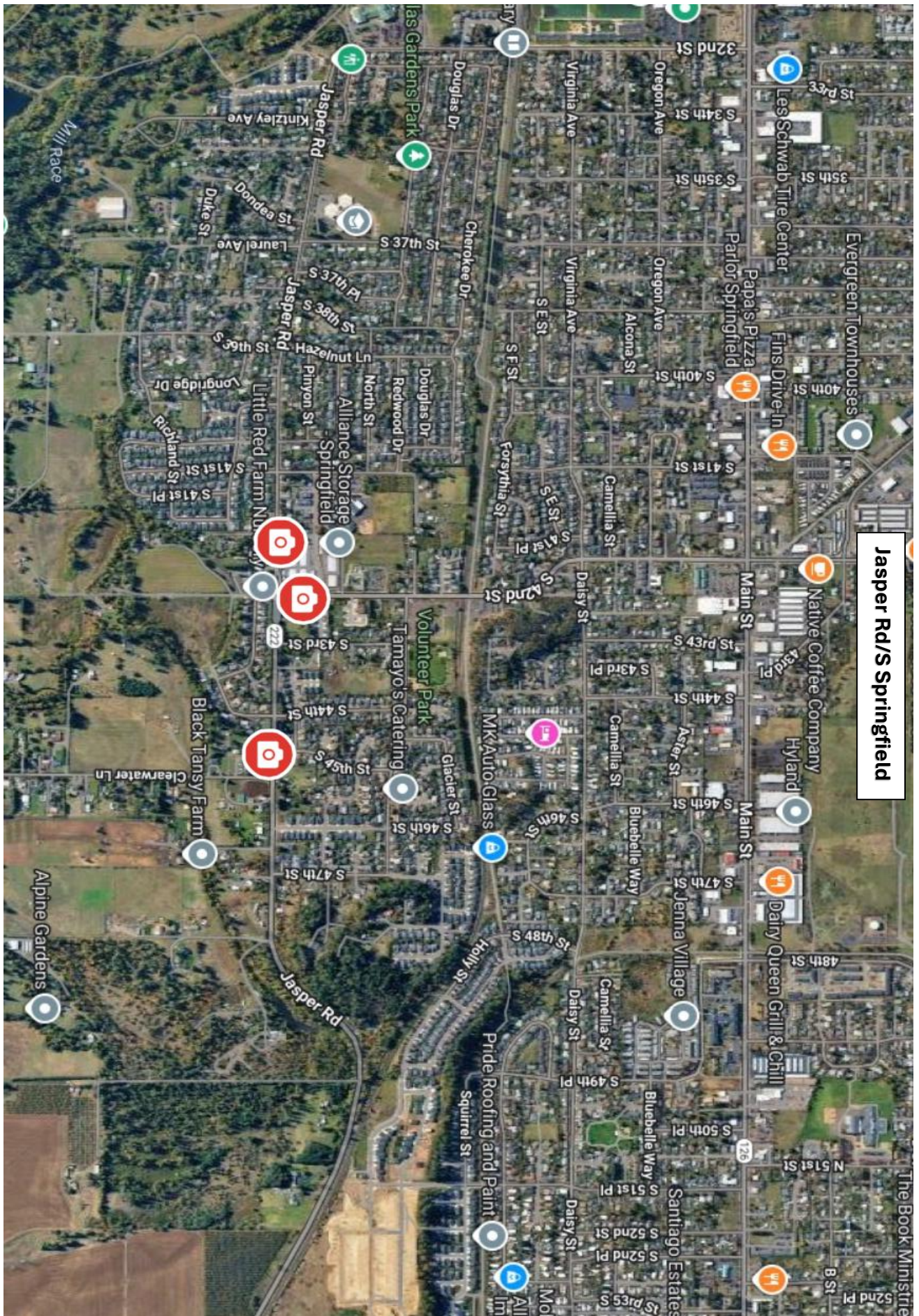






**NE & Central Springfield**

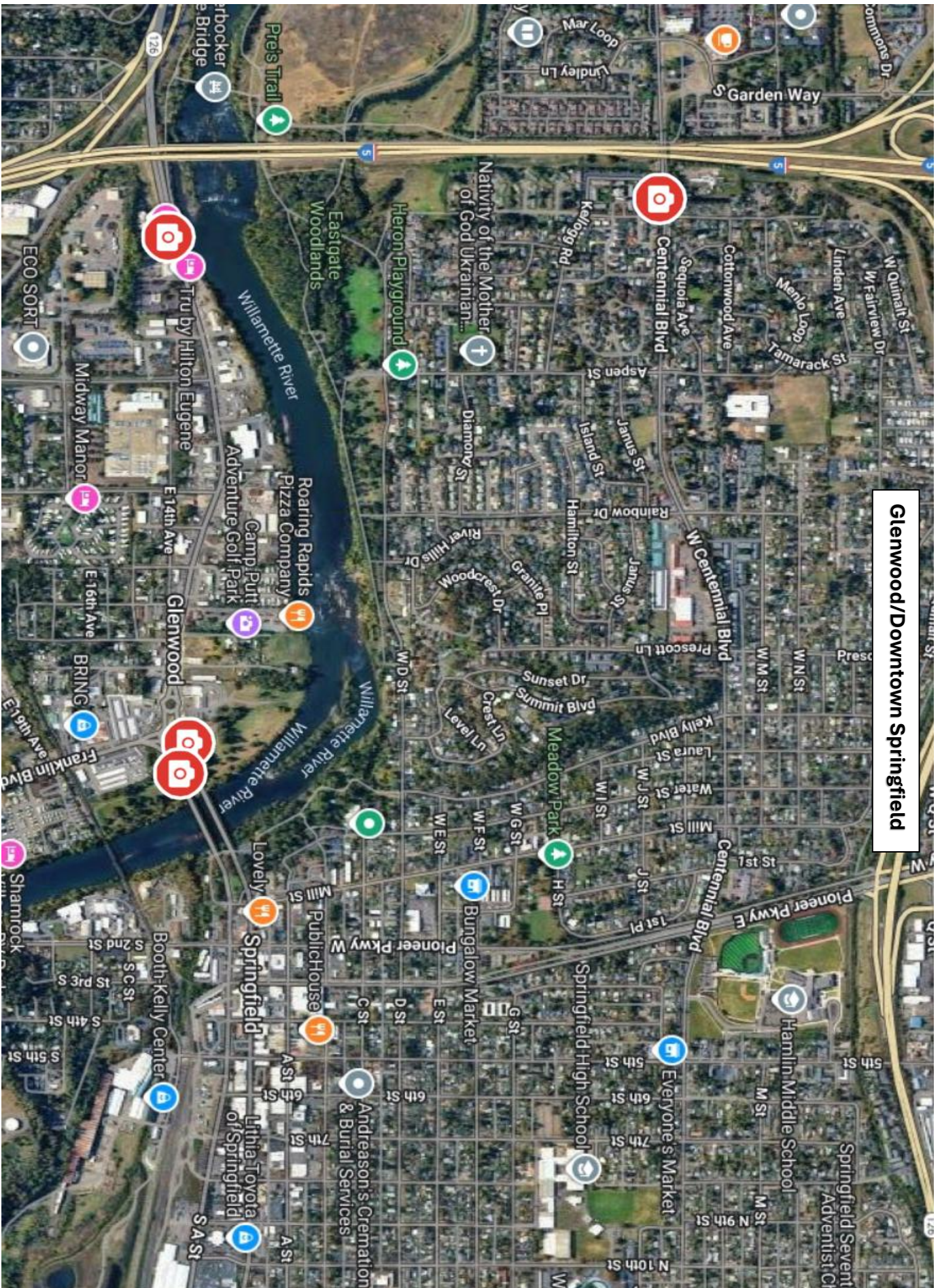




Jasper Rd/S Springfield



Glenwood/Downtown Springfield









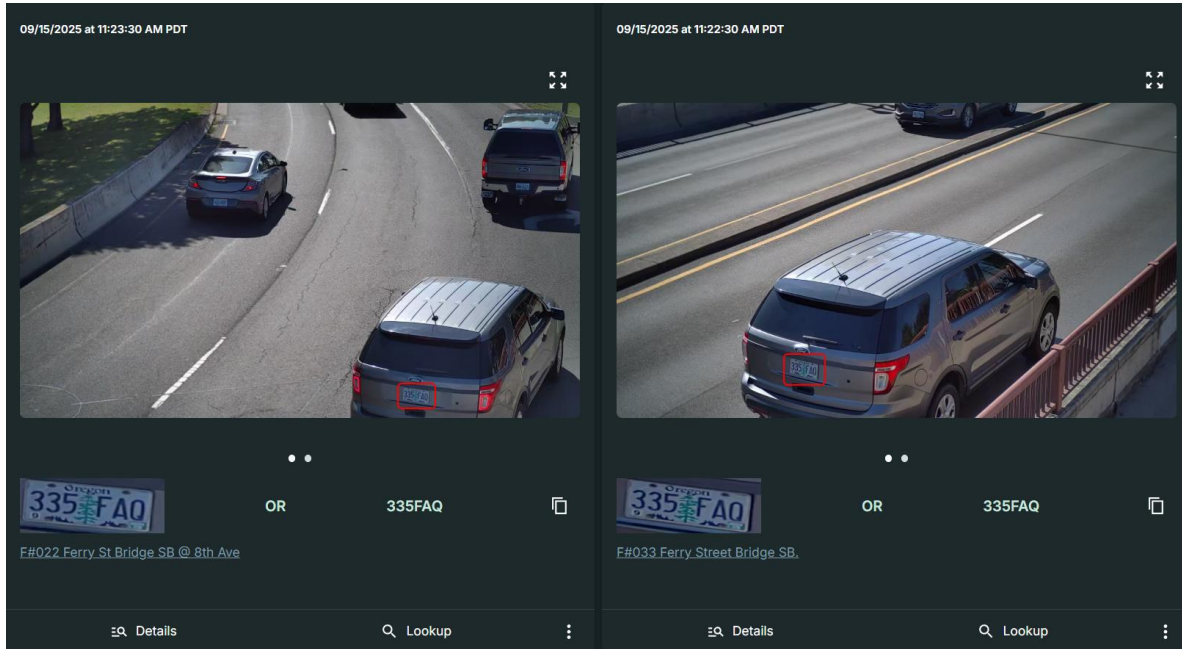
## **General Information- Flock Safety Devices**

### **Flock Safety ALPRs Stationary Cameras**

ALPR cameras do not have Pan-Tilt-Zoom (PTZ) controls or the capacity to be manipulated remotely.

ALPR cameras are pointed at right-of-way, oriented to capture rear license plates, have no video capabilities, and only a snapshot photo with location-date-time stamp are collected.

Vehicle-specific photo trigger, pedestrians cannot trigger the snapshot mechanism, and the ALPR technology deployed in Eugene does not have AI Facial Recognition capability.



### **Data Security and System Integrity of Springfield's ALPR Network**

#### **1. Secure Storage and Encryption**

All image data collected by Springfield's Automated License Plate Recognition (ALPR) system, consisting of vehicle stills with time, date, and location metadata, is securely stored within Amazon Web Services' GovCloud. This specialized cloud environment is designed for government-grade compliance and security. The data is fully encrypted at the point of capture and remains encrypted throughout transmission and storage, utilizing AES-256 encryption standards to protect against unauthorized access at every stage.

#### **2. System Compliance and Network Architecture**

Springfield's ALPR devices are engineered without public IP addresses, meaning they cannot be directly accessed from the open internet. The system architecture complies with multiple high-level industry and federal standards, including NDA, SOC 2 (Type II), SOC 3, ISO 27001, HECVAT, HIPAA, and FERPA. These credentials reflect a broad commitment to data protection, operational transparency, and lawful use.



### 3. Automatic Data Expiration Protocols

To ensure privacy and reduce data risk, each license plate image and associated metadata is subject to an automatic deletion policy. After 30 days, all records are permanently and irretrievably deleted. This process is in line with federal data sanitization protocols such as FedRAMP, ITAR, and NIST 800-88, ensuring that no residual data can be recovered from either the device or the cloud environment.

### 4. No Link to Personal Identity Systems

Stored data is not connected to DMV systems or any database containing personal identifying information. This ensures that ALPR scans remain non-invasive and anonymized unless law enforcement follows legal pathways to correlate vehicle data with individual identity during an active investigation.

## Eugene Police Statistics

### Case Resolutions May – September

Case Type	EPD	Outside Agency Assist	Case Level	Number of Cases
Stolen Vehicle	21	11	Felony	63
Property Crime	17	3	Misdemeanor	25
Violent Crime	9	3	Non-Criminal**	5
Hit and Run	7	1	Grand Total	93
Stalking	4		** Non-criminal cases included missing persons, a non-criminal death investigation, and a suspicious conditions call which turned out to be non-criminal in nature.	
Sex Crime	3			
Missing Person	3			
Homicide		2		
Narcotics	2			
Robbery		2		
Violation of No-Contact Order	1			
Reckless Driving	1			
Reckless Burn	1			
Deceased Subject	1			
Suspicious Conditions	1			
TOTAL	71	22		

Outcome	Number
Arrests	59
Recovered Vehicles	31
Weapons Recovered	9
Property Recovered	17

### Recent Press


#### Boulder police credit Flock license plate readers for helping officers find teen at center of Amber Alert

Denver7 is getting answers about why it took state investigators more than seven hours to issue an Amber Alert after receiving a request from local police.



The Boulder Police Department is crediting a system of license plate readers for helping officers find a teenage girl who was the center of an Amber Alert Tuesday morning.



**Eugene Police Department**  
October 10 at 12:18 PM · 🌐

Eugene's Automated License Plate Reader (ALPR) system aids in the arrest of seven suspects in Asian home burglary

On October 6, a home in the Bethel area belonging to Asian community members was burglarized during the daytime while occupants were working at their Eugene business. Case (25-16245). Eugene Police have been dedicating substantial, ongoing resources to investigating similar crimes that appear to be the work of a group of foreign nationals.



## **Flock Safety Questions**

### **Springfield City Council/Agenda Reviews/Public Commentary- 9/2/25 – 10/6/25**

Prepared by Criminal Intelligence Analyst B. Austin

1. How do other agencies get information from Flock? What SPD information could another agency get from Flock and what would they have to do to get it? Specifically, how could a Federal Agency get our information?
  - a.) To access Flock ALPR hits from the City of Springfield's network cameras, an agency would first need to request access to our data. These requests come through a Sharing Portal within the FlockOS dashboard and are triaged by an administrator. The administrator can choose to provide access to the following functions to each individual agency:
    - i. Search function: The other agency would receive the data from our cameras if they specifically searched for the involved plate or characteristics of a vehicle and it had been captured in the previous 30 days.
    - ii. Hotlist function: The other agency will receive an Alert generated by Flock and sent to them immediately if a specific vehicle that they have entered into their Hotlist (hit & run, warrant, etc.) is captured by any camera within Springfield's network.
    - iii. VMS Go-Live: This function is specific to Flock's live-view cameras and recordings from them, and Springfield has no plans to install live cameras with this system.
    - iv. Analytics: The other agency would have access to back-end analytics such as vehicle hit statistics, traffic analysis, etc.
  - b.) Currently, we are only allowing access to the Search Function to local & state law enforcement agencies upon request, with the plan to expand access to cameras for outside agency's Hotlist alerts to regional agencies only due to the likelihood of travel amongst local jurisdictions.
  - c.) Federal agencies are clearly identified within the FlockOS Sharing request portal with a designation label. Springfield does not currently share information with any Federal agencies, and based on internal guidelines will not provide access to them, so through the standard protocol use of FlockOS, Federal agencies would not have access to our data under any circumstance unless that data was ordered by a legal court order served upon an agency that we share with or Flock Safety directly.
2. Two cities in Illinois have recently cancelled their Flock contracts due to potential privacy concerns. What was the reasoning?
  - a.) We are aware of the recent lawsuit filed in Illinois alleging that Flock Safety improperly shared ALPR data with federal agencies, specifically U.S. Customs & Border Protection. We understand how this raises concerns, and we want to assure our community that the Springfield Police Department proactively addressed these issues during the planning and implementation of our ALPR network.



As part of our agreement with Flock Safety, SPD specifically required additional safeguards to ensure compliance with Oregon law, including HB 3265 (the Sanctuary Promise Act). Flock has since added significant technical controls, including a system-wide search filter that automatically excludes Springfield's ALPR data from any queries that include terms or purposes related to immigration enforcement or reproductive health investigations. These controls help prevent unauthorized access and reinforce Springfield's commitment to the privacy and civil liberties of all community members.

3. A concern was raised that Flock's databases could be hacked. One citizen claimed that they could hack into the system with a laptop if they stood near the camera.
  - a.) We understand that concerns about data security are valid in today's digital landscape. Flock Safety employs industry-leading security protocols to protect its ALPR data, including end-to-end encryption of data in transit and at rest, as well as secure, access-controlled servers. Even in the unlikely event of a breach, the license plate images themselves are inherently unusable for fraudulent purposes, as they do not contain personally identifiable information. Accessing ownership data requires separate, highly regulated authorization to state and federal systems such as the DMV, systems which are not linked or accessible through Flock. Additionally, all authorized access to ALPR data is logged and auditable, and SPD will conduct regular reviews to ensure strict compliance with our policy and privacy safeguards.
  - b.) The claim that someone could hack into the Flock Safety system simply by standing near one of the cameras with a laptop is entirely false. Flock ALPR cameras do not transmit data over open or local Wi-Fi networks, nor do they broadcast any accessible signal that can be intercepted nearby, specifically Bluetooth. All communications between the cameras and Flock's secure cloud servers occur over encrypted, closed cellular networks (such as LTE), with no public access points. Additionally, the system is built with multiple layers of cybersecurity protections, including encryption, strict authentication protocols, and endpoint hardening, to prevent unauthorized access. Simply put, being physically near a camera provides no pathway to access or compromise the system.
4. There were mentions of the lawsuit currently involving Flock in Virginia.
  - a.) In Norfolk, a federal lawsuit is moving forward challenging the city's installation of 172 Flock Safety ALPR cameras across 56.8 square miles. The plaintiffs argue that this extensive network amounts to warrantless surveillance, capturing everyone's movements in the city and storing that data for weeks, raising serious Fourth Amendment concerns. By contrast, Springfield is deploying only 25 cameras over 15.75 square miles, strategically placed at key ingress and egress points and high-traffic commercial corridors. Rather than creating constant overlap or blanket coverage of residential areas, our design focuses on targeted public safety needs, such as locating stolen vehicles or assisting active investigations, without enabling continuous tracking of individuals' daily movements.



5. Does Flock keep any of our information after the 30 day purge date to “train” its system?
- a.) No, Flock Safety does not retain Springfield's ALPR data beyond the 30-day retention period unless required for an active investigation or legal reason approved by the city. However, Flock may use a very limited number of de-identified vehicle images, less than 1% of all captured, to help improve the accuracy of their system. These images are stripped of all identifying information, cannot be traced back to any person or vehicle, and are never sold or shared. This small set of anonymized data is used strictly to help the system better recognize vehicle features like body type or new car models. At no time does this involve retaining data from Springfield’s system in a way that could compromise privacy or allow for tracking. The City maintains full control of its data, and any use beyond what’s contractually allowed would be prohibited.
6. Can the cameras determine if someone goes to Riverbend or MW Hospital?
- a.) No. The placement of Springfield’s 25 ALPR cameras does not create continuous, uninterrupted coverage of any individual’s movement throughout the city. The camera locations were strategically selected to monitor ingress and egress routes, high-crime corridors, and commercial areas, not residential streets or every road leading to medical facilities.
- Riverbend Hospital, for example, is located in an area where nearby cameras (such as Gateway at International, Gateway at Kruse, or Beltline at Gateway) may capture vehicle plates traveling on main arterials, but these alone cannot provide a full picture of origin, destination, or purpose of travel, nor do they capture identity or vehicle ownership without authorized follow-up using DMV databases, which are strictly controlled. Similarly, McKenzie-Willamette Medical Center is not within direct view of any camera and can be accessed from multiple directions without triggering a single Flock camera.
- These cameras are not used for real-time surveillance of private activities, and they do not record continuous paths of travel. Instead, they are used reactively and within the investigative process to support specific, authorized law enforcement needs such as locating a stolen vehicle or suspect in a crime. The system is not designed, nor capable, of monitoring personal medical visits or other protected activities.
7. Could Flock Safety sell or share Springfield’s ALPR data with third parties for profit?
- a.) No. Under Flock Safety’s publicly stated policies and contractual obligations, the City of Springfield retains exclusive ownership and full control over all ALPR data collected by its cameras. Flock has committed to never sharing or selling customer data to third parties without the explicit consent of the owning agency. The data belongs solely to the city, and Flock functions only as a service provider, not a data owner. Springfield has strict protocols in place to manage access and sharing, and there is no scenario in which Flock can unilaterally distribute or monetize the data collected through our ALPR network.



- 8.** Concerns were raised that “false hits” could lead to dangerous traffic stops.
- a.) Per policy and training, all hits that generate an alert from NCIC, Custom Hotlists and NCMEC to an employee of SPD are required to be confirmed through a secondary query to verify both veracity of the information as well as the unequivocal substantiation of the hit warranting action be taken based upon the information.
- 9.** The ongoing cost of the Flock contract will be at least \$171,000 per year moving forward once the grant expires.
- a.) The cost of the 25 cameras being installed in Springfield will be \$77,000 per year (it seems the \$171,000 figure is based on Eugene’s 57 cameras). The same grant our initial funding has come from was recently opened again and our upcoming request will include ongoing funding for ALPR technology that will cover costs through at least 2027 if fully funded. Our contract also does not have any parameters regarding the potential cancellation in the future between contracted periods, and there is no penalty if we choose to not renew the contract and Flock would then remove their equipment from these locations.
- 10.** There were multiple assertions that Flock’s market valuation as well as main source of revenue is from selling the ALPR data captured by network cameras to third-party entities for profit.
- a.) This is a common misconception, but it is not supported by any credible evidence. The license plate images captured by Flock ALPR cameras do not contain any personally identifiable information (PII), only images of license plates and vehicles on public roads. On their own, these images have no intrinsic value and cannot be tied to a person without separate, highly regulated access to DMV or law enforcement databases, which Flock does not have. Any actionable information, such as vehicle registration, owner identity, or travel patterns, requires authorized law enforcement access and additional systems that are outside of Flock’s control. Flock Safety’s business model is based on selling hardware and software services to public safety agencies, not data monetization. Despite speculation, there has been no verified investigation or finding showing that Flock has ever sold ALPR data to a third-party entity for profit. Concerns raised in recent news and lawsuits focus on data-sharing practices with other government agencies, not commercial sales. In fact, Flock’s contractual terms ensure that cities like Springfield retain full ownership and control of their data, and Flock is explicitly prohibited from selling or sharing that data without the city’s consent.
- 11.** Can Flock release Springfield’s data to anyone without our consent?
- a.) No. Section 4.1 of the contract makes it clear that all right, title, and interest in Springfield’s ALPR data belongs solely to the City. Flock is licensed to use the data only as necessary to provide services to us, and they may not sell or otherwise release our data. Section 5.3 does allow Flock to disclose footage to law enforcement, government officials, or third parties only if



legally required (such as by a subpoena or court order). Otherwise, no data can be shared without Springfield's knowledge and consent.

**12. How is data sharing with other agencies handled?**

- a.) Springfield ALPR Policy #37.1.1.5(d) states that ALPR data may be released only to other authorized and verified law enforcement officials and agencies, and solely for legitimate law enforcement purposes. Sharing is done through the Flock Network Sharing process, which is restricted to law enforcement agencies only. Within Springfield, this process is managed by the Operations Lieutenant's designee, who serves as the administrator of our network.

**13. How is use of the system audited?**

- a.) Springfield ALPR Policy #37.1.1.5(f) requires that system audits be conducted annually by the Operations Lieutenant or their designee. These audits apply both internally (ensuring SPD personnel use the system properly) and externally (verifying compliance of any agencies we share data with). Once the system has been in regular operational use, SPD will evaluate whether to modify this policy to add more frequent or additional audit requirements.

**14. What has been done to minimize privacy risks such as capturing people, and are human captures searchable?**

- a.) Prior to installation, SPD conducted months of research and site planning to carefully select camera locations that would minimize the likelihood of capturing images of pedestrians. The cameras are positioned to capture vehicles and license plates on public roadways, not people. Importantly, even if incidental human images were captured, the Flock platform does not include any ability to search for human features. Searches are limited to vehicle-related identifiers such as plate numbers, make, model, and color.

**15. How does this relate to Organized Retail Theft (ORT) and grant funding?**

- a.) The nexus between ALPR technology and combating Organized Retail Theft is strong. Stolen vehicles are frequently used in retail theft crimes, either to transport suspects or stolen goods, and regional travel is often used to avoid apprehension once offenders have become familiar to retailers in their area. The Criminal Justice Commission (CJC) recognized this connection when reviewing our request to modify our existing grant. By reallocating previously awarded funds to cover the ALPR contract, we ensured compliance with grant requirements. Many other agencies across Oregon have made similar investments under the same grant program, building regional collaboration against a widespread problem that has been highlighted in media and politics as a major driver of business losses and store closures. The CJC's approval of our modification request confirms that ALPR technology is an appropriate and justified tool within the scope of ORT enforcement.



**16.** Do Flock cameras use a feature called "Gait" to track bodily movement, such as identifying intoxicated persons?

- a.) No, Flock Safety ALPR cameras do not include any gait analysis technology. The system is designed solely to detect and analyze vehicles, not people. While third-party surveillance products in other industries have marketed gait recognition technologies, Flock's hardware and software are not equipped to track, analyze, or flag human movement patterns. Flock's system is focused on license plate recognition and vehicle feature analysis (such as make, model, color, and distinctive visual attributes like roof racks or bumper stickers). Springfield's deployment does not include any software tools that detect or interpret human motion, behavior, or physical characteristics- nor would such use be permitted under our ALPR policy. The claim that Flock cameras can track intoxicated behavior or unusual walking patterns is patently false.

**17.** Why does the Flock Transparency Portal show "Public Search Audit" activity if our cameras are currently deactivated?

- a.) This is a common point of confusion. While Springfield's ALPR cameras are currently deactivated and not actively scanning license plates, certain dashboard metrics within the Flock Transparency Portal are still updating, including user activity metrics.

There are two separate types of information shown in the Flock Transparency Portal:

Vehicle "Reads" refer to the number of license plates scanned and recorded by active ALPR cameras. Since our system is deactivated, this number has stopped increasing as of 24 hours after the last deactivation took place during the installation week of 9/22 – 9/26.

Search Audit Logs record user activity, meaning authorized users (like Springfield Police personnel) conducting manual searches within the system. These searches may be performed across shared networks or historical data that still exists from other agencies. This metric is not connected to our cameras capturing any new images.

In short, searches can still be recorded in the audit log even while our cameras are off, and this function exists to promote transparency and accountability in user behavior, not to indicate ongoing scanning or surveillance. This distinction is also documented within the Flock Transparency Portal and reinforced through our ALPR Policy.

**18.** Do ALPR cameras disproportionately impact communities of color, LGBTQ+ individuals, or other marginalized groups?

- a.) This concern is understandable and important to address transparently. However, the ALPR technology itself is inherently objective. These cameras do not detect or record race, gender, sexual orientation, or any personal characteristics. They are solely designed to capture vehicle license plates and associated details like vehicle make, model, and color, all from public roadways.



The deployment in Springfield was carefully mapped to focus on high-traffic corridors, commercial crime hot spots, and ingress/egress points. The system has been configured to minimize privacy concerns and ensure equal application, regardless of neighborhood demographics.

It's also important to note that not all community groups oppose ALPR technology. In Oakland, California, for example, the local NAACP chapter publicly supported increased ALPR deployment, citing a rise in violent crime and robberies disproportionately affecting Black communities. They advocated for ALPRs as part of a broader public safety initiative- supporting both technology and staffing solutions to help reduce crime and improve outcomes for vulnerable communities.

This shows that the conversation around ALPR use is nuanced, and in some cases, civil rights organizations support it when implemented with transparency and proper oversight- principles Springfield has built into both its ALPR policy and operational planning.

**19. What happens if the City of Springfield decides to cancel the Flock Safety contract early?**

- a.) While the City of Springfield has the ability to cancel its contract with Flock Safety at any time, doing so will still obligate the city to fulfill the financial commitment outlined in the contract agreement. The City's grant funding will be used for covering the total cost of the system, regardless of whether the cameras remain in operation. No City of Springfield general fund money is being used to support this program.

Because the funding used to support this deployment came from the Criminal Justice Commission (CJC) through the Organized Retail Theft grant program, canceling the contract would significantly impact the City's eligibility and competitiveness for future CJC grant funding. The decision to reallocate funds from the original grant proposal toward ALPR technology was carefully reviewed and approved by the CJC, which further reinforces the importance of maintaining both fiscal and programmatic accountability for the duration of the contract.

Attachments:        Flock End User License Agreement- Omnia/Insight Coop  
                             SPD ALPR Policy  
                             Alphabetical List of Networks Shared with SPD  
                             Omnia Partners Cooperative Contract Document  
                             SPD- CJC Modification Request for LPR Technology