

September 17, 2019

ATTACHMENT 4

**2019 Condensed Surveillance Impact Report  
(CSIR)**

# **Closed Circuit Television (CCTV) Traffic Cameras**

**Seattle Department of Transportation**

## Overview

**The boldface Operational Policies contained in this document constitute the enforceable policies and procedures applicable to SDOT License Plate Readers, as set forth in SMC 14.18, and are enforceable via SMC 14.18.070.**

**The Operational Policy statements in this document represent the only allowable uses of the equipment and data collected by this technology.**

This CSIR documents information about the collection, use, sharing, security and access controls for data that is gathered through Seattle Department of Transportation's (SDOT) Closed Circuit Television (CCTV) Traffic Camera system. All information provided here is contained in the body of the full SIR document but is provided in a condensed format for easier access and consideration.

## 1.0 Purpose

### Operational Policy:

- 1. The CCTV System includes any dedicated video or still camera owned or operated by SDOT, mounted on a traffic pole or at an intersection, that collects data about and/or images of vehicular traffic. Cameras that detect vehicle presence and those that count and/or classify vehicles are exempted from the policies and procedures described herein.**
- 2. The SDOT CCTV System will be used to monitor general traffic conditions on public rights of way, traffic conditions after an unplanned incident, and traffic conditions impacted by a planned event.**
- 3 The CCTV system and data shall be used only for traffic management purposes, except for when the City's Emergency Operations Center is activated to respond to an emergency or to monitor a major city-wide event, in which case the system may be used by other city personnel (e.g. Police and Fire). The system shall not be used for civil or criminal enforcement purposes.**

SDOT operates an extensive network of over 240 CCTV cameras across Seattle to help our Transportation Operations Center (TOC) detect and quickly respond to congestion, incidents, and other problems on the roads. The ability to observe traffic conditions across the City in real-time is a primary component of SDOT's Traffic Incident Management (TIM) program. The ability to see the roads provide SDOT's engineers with the necessary information to detect and quickly respond to traffic issues which leads to decreased travel delay, improved public health and safety, local economic vitality, energy savings, public safety resources, and citizen satisfaction with government services.

SDOT has linked their camera network to the Internet using the Traveler Information Map, thus

allowing commuters to view current live traffic conditions. The website shows both streaming video and still imagery which refreshes at a set interval of 1 minute, helping travelers determine whether an alternate route should be taken. These traffic images are combined with congestion information, travel times, bridge opening notifications, and other alerts to provide a full picture of traffic conditions in Seattle.

## 2.0 Data Collection and Use

### Operational Policy:

- 1. CCTV operators must make reasonable efforts to limit data capturing to video or still images of traffic conditions within public right of way or other publicly owned property.**
- 2. Operators may not intentionally use the CCTV cameras to discern any personally identifiable information that would enable the operators to identify a member of the public, unless doing so is necessary to allow the operator to perform a traffic management function. For any recording that does take place, the operator will record no more information than necessary for the traffic management function. Operators will make reasonable efforts to limit CCTV video or still images of traffic conditions.**
- 3. SDOT shall develop standard training for operation of the SDOT CCTV Traffic Camera System and handling and deletion of data collected by it in accordance with this Section and with any additional applicable SDOT policies, and only employees who have undergone such training may access or use the SDOT CCTV Traffic Camera System.**

A CCTV is a dedicated video camera which observes vehicular traffic on the road and are not related to the red-light and speed enforcement camera systems. In Seattle, these are installed along most major arterials, and are typically mounted on traffic poles at signalized intersections. The cameras communicate using SDOT's private Intelligent Transportation System network, and each typically receives power from the nearest traffic signal cabinet. The Transportation Operations Center (TOC) receives the live video in real time and distributes information if there is a traffic collision or some other disruptive incident or road safety issue. The cameras are remotely controllable (full pan, tilt, and zoom) allowing operators to accurately maneuver cameras to best understand traffic conditions in the area. The cameras are powered and providing video 24x7 unless there is a technical issue at a specific site.

- 4. Any City employee, whether an internal SDOT employee or other departmental user of the System, and those accessing data collected by the System, must complete training prior to using the System or accessing data collected by it.**

## 3.0 Data Minimization & Retention

### Operational Policy:

1. **CCTV camera videos recorded for engineering studies will be deleted within 10 days.**
2. **The SDOT CCTV System will not be used to collect any data other than the following:**
  - a. **Live-streamed feed of current traffic conditions**
  - b. **Recorded video of traffic for engineering studies**
  - c. **Still images of traffic conditions used in training materials or included in social media updates**
3. **To the extent feasible, CCTV public feed must be terminated during such times as personally identifiable information is visible on the feed.**

Video will not be archived except in specific scenarios when it has been requested by qualified City personnel who have been tasked with completing an assignment where the observation of traffic would aid in a successful outcome. Examples of this include: the monitoring the effects of a change in traffic signal timing, observing the traffic impacts of a special event to better prepare for similar occurrences in the future, or observing traffic after a channelization change has been made to confirm that vehicles are able to make safe movements. In those instances, all video is destroyed within 10 days of collection. All users are trained not to intentionally position cameras in a manner where license plates or people can be individually discerned, and to only use the cameras as a tool to observe traffic conditions along a street.

All archived files are permanently deleted within 10 days, and all camera operators are trained on the usage policy which states, "Authorized CCTV users shall not use the CCTV cameras to zoom in close enough to discern any information that would enable identification of a member of the public, including, without limitation, license plate numbers, unless doing so is necessary to allow the operators to perform a vital component of their jobs."

## 4.0 Access & Security

### Operational Policy:

1. **SDOT only supports users of the software in the following departments or functional areas:**
  1. **SDOT Transportation Operations Center**
  2. **SDOT Maintenance Operations Unit Dispatch**
  3. **SDOT Traffic Signal Shop**
  4. **SDOT Traffic Signal Timing Engineers**
  5. **Seattle Emergency Operations Center**
  6. **Seattle Executive Protection Unit**
  7. **Seattle Fire Alarm Center**
  8. **Seattle Police Operations Center**

2. **Traffic Camera video recordings used for engineering studies will be destroyed after 10 days and may be accessed only by SDOT employees.**
3. **SDOT must keep a log of all access to and operations of the CCTV, including streaming stop/start, recording dates and topics. If new equipment provides capability to log camera adjustments, SDOT will revise its procedure accordingly.**

## Access

Access to the camera control software (Cameleon) will be managed by the TOC Technical Team who grant system privileges to individual users based on their operational needs. User authorization is password protected, and once a successful log-in occurs, the list of accessible cameras appears.

Per the SDOT Camera Control Policy, the SDOT Transportation Operations Center (TOC) has the highest priority and can lock out other users (listed above) from taking control of the camera. When the traffic camera is locked by the SDOT TOC, no other user has the ability to move it. If lower level users have a need of any SDOT CCTV camera, that user must contact the SDOT TOC and the CCTV may be released for their use (depending on the current use versus the requested use).

## Security

Video recordings used for engineering studies will be stored on a shared network drive accessible only by City personnel. Additionally, the files are kept in a folder which has specific security permissions to only allow the intended viewer access to the footage. Per SDOT's Use Policy, all recordings will be destroyed immediately after use. Recordings will not be stored or disseminated.

## 5.0 Data Sharing and Accuracy

### Operational Policy:

1. **The CCTV cameras will provide a 24x7 publicly available livestream**

The live streaming video from each of these cameras will be accessible to the public on SDOT's Traveler's Information Map and only used by other city departments to understand current traffic conditions.

Per the City of Seattle's Privacy Statement, outlining commitments to the public about how the City collects and manages public data: *We do not sell personal information to third parties for marketing purposes or for their own commercial use.* The full Privacy Statement may be found [here](#).

2. **SDOT may disseminate live video streams over its web page, provided that users accessing the stream are notified that the system is intended to be used to monitor traffic and for no other purpose.**

## 6.0 Equity

### Operational Policy:

1. **SDOT will install CCTV cameras based on street transportation volumes and locations based on gaps in travel time coverage along corridors identified in the SDOT ITS Strategic Plan.**

In terms of technology installation, SDOT installs CCTV Cameras based on street transportation volumes and related technical criteria (e.g., based on gaps in travel time coverage along corridors specified in the SDOT ITS Strategic Plan). To the extent that CCTV cameras provide communities of color or marginalized communities with additional traffic incident and congestion information, they benefit with this added data for improved transportation decisions. Outside of information on SDOT's dynamic message signs (fed by LPR data), much of the travelers' information is internet or mobile based, so people without mobile phone or internet access may not be able to access SDOT Traveler Information Map's data.