

City of Bellingham Parking Services ALPR Use Policy

1. Purpose

Establish clear standards and for the lawful and transparent use of an Automated License Plate Reader (ALPR) system by the City of Bellingham Public Works Parking Operations.

Parking Operation Code Enforcement Staff use ALPR systems for parking operations for the limited purpose of enforcing parking restrictions and regulations under Bellingham Municipal Code, Chapter 11 and RCW 46.55.

All use of ALPR by parking enforcement staff shall be in accordance with Engrossed Substitute Senate Bill 6002 (ESSB 6002), codified at RCW Chapter 10, and this policy.

2. Definitions:

Automated License Plate Reader (ALPR): A technology that uses cameras and computer algorithms to automatically capture images of license plates, convert the images into alphanumeric characters, and compare the resulting data to lawfully authorized databases or hotlists.

ALPR system: The complete set of hardware, software, databases, networks, and administrative controls used to capture, store, query, analyze, or share ALPR data. This includes fixed, mobile, and portable ALPR units operated by the City of Bellingham or contract agencies.

ALPR data: All data collected or generated by an ALPR system, including, but not limited to:

1. Global positioning system coordinates
2. Location
3. Date and time of capture
4. Speed of travel
5. Photograph
6. License plate number
7. Automobile characteristics
8. Other identifying information

ALPR data does not include images or video that do not contain a license plate or that contain a license plate but are not processed through ALPR analytics.

Audit trail data - All forms of data collected or generated by an automated license plate reader system that identify how the system is accessed or used. "Audit trail data" includes information about who accesses or uses the system, and how and when the system is accessed or used. "Audit trail data" does not include automated license plate reader data (SB 6002).

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3. Permissible Use of ALPR

City of Bellingham Parking Operation Code Enforcement Staff are ONLY authorized to use City-approved ALPR data and systems for the limited purpose of parking enforcement. Staff are authorized to use ALPR systems to run a license plate to identify unpermitted or unpaid parking session (violation) within City limits in the following locations:

- Metered and time-limited signed parking areas
- Residential parking zones (RPZ).
- Permit-required City of Bellingham parking facilities
- City of Bellingham owned parking facilities.

Any other use of ALPR data or systems is strictly prohibited unless expressly authorized by ESSB 6002 or otherwise required by law or court order.

4. Prohibited Use of ALPR

Public Works staff shall not use ALPR systems or ALPR data for any purpose not authorized under Section 3 of this policy. Prohibited uses include, but are not limited to:

- (a) Immigration investigation or enforcement in violation of Washington law.
- (b) Monitoring individuals or groups based on protected characteristics.
- (c) Tracking, monitoring, or investigating activity protected by the state or federal constitutions, including protected speech, association, assembly, religious exercise, or other protected activity.
- (d) Accessing, querying, or using ALPR for personal, non-work-related, curiosity-based, or retaliatory purposes.
- (f) Using ALPR in a manner inconsistent with this policy, state law, or court order.
- (e) Any purpose not expressly authorized under ESSB 6002 or this policy.

5. Restricted Locations for Collection

As required under ESSB 6002, Parking Operation Code Enforcement Staff shall not use ALPR on the premises or immediate surroundings of facilities that provide protected health care, as described in chapter 7.115 RCW, or at facilities conducting an immigration matter as defined in RCW 19.154.020, elementary and secondary schools, places of worship, courts, or food banks.

6. Data Collection and Retention

The Public Works Department retains ALPR data only for the time periods permitted under ESSB 6002 and this policy. All ALPR data must be managed in a manner that minimizes privacy risks, prevents unauthorized retention, and ensures timely deletion consistent with statutory requirements. All stored ALPR data shall not be retained longer than 21 days, unless retained for the purpose of parking enforcement. Under those circumstances, the ALPR data must be deleted

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no later than 12 hours after final disposition of a parking enforcement case, including exhaustion of any applicable appeals process.

When no longer needed, ALPR data shall be deleted according to the established records retention schedule. All Parking Code Enforcement staff shall follow Standard Operating Procedures to ensure that all ALPR data, if retained, is timely deleted consistent with this policy and statutory requirements.

7. Audit Trail Requirements

The City shall require ALPR vendors to implement functionality capable of logging all exports, downloads, or sharing of ALPR data as required under ESSB 6002 audit-trail provisions. The Parking Operations Supervisor shall work with vendors to ensure timely development and deployment of these capabilities.

8. Training

All Parking Code Enforcement Staff shall complete department-approved training before being authorized to access or use an ALPR system for parking enforcement.