

MEMORANDUM

CITY OF GRAND RAPIDS

DATE: September 3, 2026

TO: City Staff

FROM: Mark Washington, City Manager 

SUBJECT: **City Manager Administrative Order 2026-01: Use of Automated License Plate Readers and Related Surveillance Technology**

History of Automated License Plate Readers (ALPRs) in Grand Rapids

The City of Grand Rapids has long recognized both the public safety value of appropriate technology and the importance of ensuring that surveillance technologies are used responsibly, transparently, and with appropriate protections for privacy and civil liberties.

Administrative Policy 15-03, Acquisition and Use of Surveillance Equipment and Surveillance Services, establishes a comprehensive framework for the acquisition, use, oversight, reporting, and public review of surveillance technologies used by City departments. The policy generally exempts surveillance equipment acquired before March 24, 2015, and subsequent replacement equipment that does not materially change its functions or capabilities.

The Grand Rapids Police Department (GRPD) has utilized Automatic License Plate Reader (ALPR) technology for more than a decade. The City Commission first approved the purchase of ALPR systems from 3M/PIPS Technology in 2012. As stated in the Bid List Resolution dated October 9, 2012, the system used a combination of high-speed color and infrared cameras to capture license plates and images of vehicles, record the date, time, and GPS coordinates, and compare captured plates against authorized databases to provide relevant vehicle information to police personnel.

GRPD subsequently switched the vendor for ALPR technology from 3M/PPS to Minuteman Security Technologies as the 3M BOSS software and Slate hardware products had become obsolete. The switch was approved by the City Commission through a Bid List Resolution dated February 11, 2020.

In January 2024, the City Commission approved GRPD's transition to Flock Safety ALPR technology through the Bid List Resolution dated January 23, 2024. In determining whether the Surveillance Policy 15-03 would apply to this change in vendor, GRPD compared the description of the technology from Flock to the original description

of the technology approved in 2012. The description from Flock referenced “Falcon Cameras” and provided the following overview:

- Flock LPRs are designed to capture images of rear license plates aimed in the direction of traffic.
- Flock LPRs are not designed to capture pedestrians, sidewalks, dumpsters, gates, other areas of non-vehicle traffic, intersections.
- They capture vehicles driving away from an intersection. They cannot point into the middle of an intersection.
- They should be placed after the intersection to prevent stop and go motion activation or "stop and go" traffic.

GRPD understood that the ALPRs would compare pictures of license plates within the Flock database. The database has been described as a connected public safety platform that helps authorized users find information relevant to a criminal investigation or emergency health and safety situations (e.g., missing persons).

Flock Safety Timeline:

- January 2024: City Commission approved the purchase of Flock Safety ALPR technology.
- June 2024: Installation was completed and the Flock cameras became operational.
- June 2026: Contract renewal.

Following comprehensive presentations by GRPD and Flock Safety to the Public Safety Committee on August 25, 2026, as City Manager, I have concluded that the City's approach should evolve along with the technology.

Modern ALPR platforms have capabilities extending beyond the traditional reading and comparison of license plates, including the ability to search vehicle characteristics and other information using machine-learning tools and to access information through broader networks of participating agencies. These developments warrant application of the City's established surveillance policy framework to future renewals, acquisitions, and material expansions of this technology.

Administrative Order

Accordingly, pursuant to my authority as City Manager, I hereby direct the following:

1. Application of Administrative Policy 15-03 to Existing Flock Technology

Effective Monday, September 7, 2026, the City's existing Flock Safety system shall be subject to the applicable governance, oversight, reporting, complaint, audit, and transparency provisions of Administrative Policy 15-03.

Nothing in this Order shall be interpreted as requiring retroactive approval under Administrative Policy 15-03 of equipment or services previously acquired by the City. Based on the original 2012 approval from City Commission and the technological

descriptions provided in 2024, the continued use and acquisition was not required to be subject to Administrative Policy 15-03.

2. Existing Flock Units

The City may continue the use, maintenance, and – if needed – replacement with substantially similar equipment, of its existing Flock units through the expiration of the current contract term on June 9, 2027, subject to the requirements established in Section 1 of this Order.

Any procurement, renewal, extension, replacement, or successor agreement that would permit continued use of stationary Flock equipment or substantially similar surveillance technology after June 9, 2027, shall comply with the acquisition and approval requirements of Administrative Policy 15-03 before the City enters into such commitment.

3. Prohibited Use

As addressed by other laws, City Policies and GRPD Policies, no city employee shall use or allow the technology to be used to intentionally target a person based on their race, ethnicity, gender, income level, immigration status, healthcare needs, or other protected class status.

No city employee shall use or allow the technology to be used for an unlawful purpose. Data shall be retained pursuant to the contractual agreement between the parties and not to exceed 30 days unless it is required to be preserved as evidence.

4. New or Materially Expanded Capabilities

Prior to the expiration of the existing agreements, no City department shall acquire, activate, deploy, or materially expand a Flock capability – or another surveillance technology or service associated with the existing system – that materially changes its functions or capabilities without first complying with Administrative Policy 15-03.

5. 2025 Annual Reporting

The comprehensive report regarding GRPD's use of Flock technology presented to the Public Safety Committee on August 25, 2026, shall be accepted as satisfying the 2025 annual reporting requirement for the City's Flock/ALPR system. A similar report covering calendar year 2026 shall be made to the Public Safety Committee before the June 9, 2027 expiration of the contract.

Beginning with calendar year 2027, use of the Flock/ALPR system shall be incorporated into the City's regular surveillance reporting processes in accordance with Administrative Policy 15-03.

6. Future Application

It is the policy and direction of the City that future decisions concerning ALPR technology and related surveillance technologies shall be evaluated based upon their functions and capabilities rather than their characterization as replacements for previously acquired equipment.

Any future acquisition, renewal, extension, replacement, material expansion, or successor technology shall be evaluated for compliance with Administrative Policy 15-03, including its requirements concerning public review, privacy and civil-liberties impacts, operational protocols, data-management protocols, fiscal review, oversight, and reporting.

Any use of facial recognition technology by GRPD in connection with surveillance equipment or surveillance services shall independently be subject to all applicable provisions of Administrative Policy 15-03 and shall require express approval under the policy before such technology may be acquired, activated, deployed, accessed, or utilized.

7. Implementation

The Grand Rapids Police Department, Office of Oversight and Public Accountability, Fiscal Services Department, Technology and Change Management Department, City Attorney's Office, and other affected departments shall take the actions necessary to implement this Order.