



City and County of San Francisco Juvenile Probation Department

ALLEN A. NANCE
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Ms. Alisa Somera
Assistant Clerk
Land Use and Economic Development Committee
Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA. 94102-4694

RE: File No. 150682 Proposed Ordinance to amend the Administrative Code – Telematic Vehicle Tracking Systems for City Vehicles

Dear Ms. Somera:

The San Francisco Juvenile Probation Department (JPD) recognizes and appreciates the value of vehicle telematics as an effective tool in the City's efforts to monitor the safe and efficient operation of City vehicles. These systems can also provide invaluable data when City vehicles are involved in collisions. We understand that the proposed ordinance will require the installation and use of telematics vehicle tracking systems in all motor vehicles owned or leased by the City with some exceptions, and further require a submission of an annual report to the City Administrator based on data from those systems.

The intent of this ordinance is clearly understood and supported by JPD, however the installed technology provides real time location, movement, and status of the vehicle that would result in officer safety concerns as well as interfere with our normal operating functions. We understand that a waiver is available for vehicles where tracking is not feasible or would unduly interfere with the Department's ability to discharge its official duties. The ordinance in draft format includes an exemption for PUC, Airport Port and MTA.

The real-time tracking of vehicle movement in marked and unmarked vehicles operated by peace officers in the performance of their official duties, introduces a vulnerability that has the potential to compromise the safety and security of probation officers and juvenile counselors who are routinely called to transport high risk and high profile detainees within and outside of the county. In some instances, these transports involve minors who have been victims of abuse and neglect and are moved to safe, secure and undisclosed locations where their abusers cannot gain access to them. This is especially critical in cases involving commercially sexually exploited

children (CSEC). In addition, the safety of high profile detainees and the peace officers who accompany them, can be compromised if the vehicle in which they are travelling is also being tracked as they are moved to court hearings or other jurisdictions outside of the San Francisco Juvenile Justice Center.

Probation Officers are also called to participate in individual and joint agency operations with police and other law enforcement agencies that may involve surveillance or apprehension of high risk offenders. The use of telematics in vehicles used by these officers would also compromise the safety and security of our own personnel, as well as the police and other law enforcement agencies with whom we partner (e.g. SFPD, FBI, CHP, Sheriff, etc). This is particularly true in circumstances involving the recovery of juveniles who have absconded and violated court orders. We believe that telematics installed in vehicles operated by peace officers would compromise the routes, locations and whereabouts of high risk and high profile detainees which would otherwise be undisclosed and violate officer safety and client confidentiality. Even if active monitoring was disabled, data gained and documents submitted would be subject to the Public Records Act and their disclosure would violate confidential identity and location of our juveniles protected by 827 W&I. Additionally, occasions arise when vehicles are home-garaged by our peace officer staff and their home addresses are confidential pursuant to 1801.4 of the California Vehicle Code.

To be clear, we support the ordinance in its intent and believe that many of the vehicles in our fleet (non-law enforcement vehicles) could comply with the provision of the proposed ordinance. We would welcome the telematics installed on those vehicles including the annual reporting requirements under consideration. However, we also request that those vehicles designated as law enforcement vehicles and used by sworn peace officers be exempted from the ordinance in the interest of officer, public safety, and juvenile privacy.

Respectfully Submitted,



Allen A. Nance
Chief Juvenile Probation Officer