San Francisco Board of Supervisors
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place
City Hall
San Francisco, CA 94102

December 10, 2025

Submitted via Electronic Mail

Re: Vote No on Ordinance 250979

Dear Supervisors:

On behalf of over 20 civil rights and community organizations, I write to express concern with Ordinance 250979 and urge you to vote no. The ordinance unnecessarily expands the scope of SFPD's surveillance capability, is expensive, and will undoubtedly invade protected privacy interests.

The Ordinance Unjustifiably Expands the Police Surveillance State

Attaching and monitoring a GPS tracking device on a vehicle is a search under the Fourth Amendment and requires a warrant[1] or an exception to a warrant.[2] Concurring in that result, Justice Sotomayor further explained why:

> "GPS monitoring generates a precise, comprehensive record of a person's public movements that reflects a wealth of detail about [their] familial, political, professional, religious, and sexual associations."[3]

> "Awareness that the Government may be watching chills associational and expressive freedoms. And the Government's unrestrained power to assemble data that reveal private aspects of identity is susceptible to abuse. The net result is that GPS monitoring—by making available at a relatively low cost such a substantial quantum of intimate information about any person whom the Government, in its unfettered discretion, chooses to track—may "alter the relationship between citizen and government in a way that is inimical to democratic society."[4]

California recognizes this risk and accordingly criminalizes civilian GPS tracker use.[5] This deeply skeptical framework must govern SFPD's request.

SFPD Has Provided No Empirical Basis Demonstrating That GPS Trackers Are Necessary or Effective

It is therefore deeply troubling that the proposed ordinance and SFPD's technology policy are conspicuously silent on why GPS trackers are needed other than vague statements at "reducing crime." Both baselessly assume that any tool provided to SFPD will reduce crime.

SFPD has presented no data to date to support the use of GPS trackers or the expansion of their pilot program. That makes sense: an independent evaluation of GPS trackers did not establish a reduction in pursuit-related crashes or injuries.[6] Moreover, no peer-reviewed evidence supports the notion that these devices make communities safer.

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[1] See *United States v. Jones* (2012) 565 U.S. 400.
[2] See Cal Pen. Code § 637.7.
[3] *Jones* (2012) 565 U.S. at 415 (Sotomayor, J., concurring).
[4] Id. at 416 (2012) (Sotomayor, J., concurring) (quoting *United States v. Cuevas-Perez*, 640 F.3d 272, 285 (7th Cir. 2011) (Flaum, J., concurring)).
[5] Cal Pen. Code § 637.7.
[6] National Institute of Justice, *Case Study of a GPS Tracking Tool Designed to Aid in Police Vehicle Pursuits*, NCJ 250941 (July 2017), https://nij.ojp.gov/library/publications/case-study-gps-tracking-tool-designed-aid-police-vehicle-pursuits.

Experience Shows That "Pursuit Mitigation" Programs Quickly Expand Into Generalized Surveillance Regimes

Gifting SFPD expensive GPS trackers for the stated uses makes mission creep all but inevitable. Police agencies frequently pilot programs using GPS trackers under the banner of "pursuit mitigation," but written policies adopted thereafter permit broad uses: monitoring movements, finding evidence, and tagging stolen vehicles or vehicles tied to enumerated crimes, often without prior court authorization at the moment of launch.[7]

Once infrastructure and training costs are sunk, the incentive to justify continual use grows, transforming a narrow tool into a general tracking system. And given SFPD's long history of racial disparities in traffic stops and enforcement, providing the Department with another tool will further drive the racial disparities endemic to the criminal legal system.

[7] See, e.g., New York City Police Department, *Impact and Use Policy: Global Positioning System (GPS) Tracking Devices* (Sept. 13, 2024), https://www.nyc.gov/assets/nypd/downloads/pdf/public_information/post-final/global-positioning-system-gps-tracking-devices-nypd-impact-and-use-policy_9.13.24.pdf; Culver City Police Department, *General Order No. 2024-13: StarChase Policy* (2024), https://www.culvercitypd.gov/files/assets/police/v/1/documents/general-orders/general-order-2024-13-starchase-policy.pdf.

Evidence from Other Jurisdictions Demonstrates Unreliability and Liability Risks

Other jurisdictions have rightfully been skeptical of adopting the technology. Oakland terminated its StarChase contract in 2024 after limited use and reliability issues.[8] Seattle's debate underscores the same risks of unchecked expansion of police surveillance tools.[9] Connecticut police agencies abandoned the project after constitutional objections from civil-liberties advocates.[10] This cautious approach is justified since GPS trackers frequently fail to attach, detach mid-pursuit, or damage property even when deployed correctly.[11] Each misfire creates potential liability San Franciscans will pay for and does not mitigate danger but adds new ones.

SFPD Already Possesses Expansive Surveillance Tools

SFPD already has access to automatic license-plate readers—which have come under scrutiny recently[12]—drone surveillance technologies, body-worn cameras, and support of other police agencies such as CHP and the FBI. GPS trackers add little operational capacity yet magnify risks to privacy.

San Francisco voters have repeatedly favored restraint and transparency in surveillance technology. Approving SFPD's continued use of GPS trackers undermines the City's commitment to limiting surveillance and sets a precedent for back-door expansion of tracking technologies.

Uphold San Francisco's Commitment to Transparency and Oversight

This body has rejected previous ill-supported requests to expand SFPD's toolkit. It should follow that approach and reject this request now. For the foregoing reasons, we urge you to

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[8] Azucena Rasilla, "Oakland Ends StarChase Contract After Years of Limited Use", The Oaklandside (July 22, 2024).

[9] Doug Trumm, "Seattle Police Want StarChase Car Tracking", The Urbanist (May 16, 2025).

[10] Lisa Backus, "CT Police Are Launching Dart-Like GPS Trackers at Fleeing Cars. Some Question Their Legality", CTPost (Jan. 12, 2025).

[11] See National Institute of Justice & Johns Hopkins Applied Physics Laboratory, Pursuit Technology Impact Assessment: Version 1.1 33–34 (Jan. 2017), NCJ 250549, https://nij.ojp.gov/library/publications/pursuit-technology-impact-assessment-version-11; National Institute of Justice, Case Study of a GPS Tracking Tool Designed to Aid in Police Vehicle Pursuits (July 11, 2017), NCJ 250941, https://nij.ojp.gov/library/publications/case-study-gps-tracking-tool-designed-aid-police-vehicle-pursuits; Stephen Firth, Redmond Police Aim to Limit Dangerous Car Chases with GPS Darts, The Urbanist (May 16, 2025), https://www.theurbanist.org/2025/05/16/redmond-police-aim-to-limit-dangerous-car-chases-with-gps-darts/; New York City Department of Investigation, An Assessment of NYPD's Compliance with the POST Act 41 (May 30, 2024), https://www.nyc.gov/assets/doi/reports/pdf/2024/May/POST-ACT-REVIEW-REPORT-05302024.pdf.

[12] Tomoki Chien, SFPD let Georgia, Texas cops illegally search city surveillance data on behalf of ICE, The San Francisco Standard (Sept. 8, 2025), https://www.sfstandard.com/2025/09/08/sfpd-flock-alpr-ice-data-sharing/.

vote no on this ordinance and to reaffirm San Francisco's commitment to independent oversight, open government, and public trust.

Sincerely,

3RD Street Youth Center & Clinic
ACLU NorCal
Anti Police-Terror Project
California Coalition for Women's Prisoners
Chinese for Affirmative Action
Coalition on Homelessness, San Francisco
Council on American-Islamic Relations SF Bay Area
Critical Resistance
Harvey Milk LGBTQ Democratic Club
HIV Advocacy Network
Homeless Youth Alliance
Indivisible San Francisco
Lawyer's Committee for Civil Rights of the San Francisco Bay Area
League of Women Voters San Francisco
Legal Services for Prisoners with Children
Mission Action
National Harm Reduction Coalition
San Francisco Public Defender's Office
Secure Justice
Showing Up for Racial Justice San Francisco
Young Women's Freedom Center