2024 Annual Surveillance Technology Usage Review

September 30, 2025

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2024 Annual Surveillance Technology Usage Review

Report Highlights

Background

This 2024 Annual Surveillance Technology Usage Review includes one technology: Seattle Department of Transportation (SDOT) Closed Circuit Television Cameras (CCTV). This technology is used to monitor traffic conditions in Seattle. SDOT traffic engineers view the live camera footage to detect and respond to traffic issues. Through the public website that transmits live camera feeds, the public can view traffic conditions to help make travel decisions. Traffic cameras are also used to respond to emergencies and to monitor major city-wide events.

What We Found

We concluded that SDOT is in partial compliance with the technology's use pursuant to its Surveillance Impact Report and Seattle Municipal Code 14.18. In accordance with the code, SDOT tracks costs associated with the technology and responds to customer inquiries regarding CCTV. However, we found several areas that SDOT should address, including transparency for CCTV pilot projects involving artificial intelligence, inconsistent policies and procedures, and issues regarding records retention. We also found that SDOT does not promptly document its rationale for the locations of new CCTV cameras, contradictory to prior SDOT reports. In response to this finding, SDOT completed its rationale for the placement of new 2024 cameras in the third quarter of 2025.

Recommendations

We make eight recommendations to address SDOT's use of its CCTV technology. See Appendix A for the full list of recommendations.

Department Response

SDOT staff acknowledged the areas we identified for improvement. They also shared some specific actions they will take in response to our recommendations. See Appendix B for the department's full response.

WHY WE DID THIS AUDIT

Seattle Municipal Code 14.18.060 requires the City Auditor to annually review City Council-approved non-police surveillance technologies used by City of Seattle departments.

HOW WE DID THIS AUDIT

To accomplish the audit's objectives, we:

- Reviewed the Seattle Municipal Code, relevant Surveillance Impact Reports, CCTV system access logs, department policies and procedures, and previous audits
- Obtained cost data for the use of CCTV technology
- Analyzed complaints and concerns to City about CCTV technology
- Interviewed department officials
- Toured the SDOT Transportation Operations Center

Seattle Office of City Auditor
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EXECUTIVE SUMMARY

We reviewed the 2024 usage of the Seattle Department of Transportation's Closed Circuit Television traffic cameras for compliance with Seattle Municipal Code 14.18. Below is a summary of the results of our work.

14.18.060 Provision	Compliance Assessment	Recommendations (See Appendix A)
A. How the surveillance technology has been used, how frequently, and whether usage patterns are changing over time	**Not in compliance** 	Recommendation 1
B. How often the surveillance technology or its data are being shared with other entities, including other governments in particular	**Not in compliance** 	Recommendations 2-3
C. How well data management protocols are safeguarding individual information	**Not in compliance** 	Recommendations 4-7
D. How deployment of the surveillance technology impacted or could impact civil liberties or have disproportionate effects on disadvantaged populations, and how those impacts are being mitigated	**Not in compliance** 	Recommendation 8
E. A summary of any complaints or concerns received by or known by departments about the surveillance technology and the results of any internal audits or other assessments of code compliance	**In compliance** 	None
F. Total annual costs for use of the surveillance technology, including personnel and other ongoing costs	**In compliance** 	None

INTRODUCTION

Background and Overview

Seattle Municipal Code (SMC) 14.18 requires City of Seattle (City) departments to obtain City Council approval before their acquisition of new surveillance technologies. The approval process includes the development of a Surveillance Impact Report (SIR) for each technology. Each SIR is required to include the information described in SMC 14.18.040, and after Council approves the acquisition and the terms of the SIR, the department may acquire and use the approved technology only in accordance with the procedures and protocols in the SIR.[1]

SMC 14.18 resulted from concerns about privacy, the lack of a process for the City's acquisition of surveillance technologies, and the risks that such technologies could pose to civil liberties related to privacy, or freedom of speech or association, or have a disparate impact on specific groups through over-surveillance. The chapter was most recently updated in 2018 through Ordinance 125679 ("Surveillance Ordinance"), which included additional protocols and reporting requirements for departments.

SMC 14.18.060 requires the City Auditor to annually review the surveillance technologies used by all City departments, except for those used by the Seattle Police Department, which are reviewed by the Seattle Office of Inspector General for Public Safety. The City Auditor produces an initial audit report for each Council-approved surveillance technology to determine whether it has been used in compliance with applicable provisions of the SMC. After initial surveillance technology reviews, the City Auditor reports on its annual review of technologies in a single Annual Surveillance Technology Usage Review report.

This 2024 Annual Surveillance Technology Usage Review includes:

- Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) Cameras

The initial audit report on SDOT CCTV was published June 30, 2021.

On September 16, 2024, the Seattle Information Technology Department (ITD) issued a report that revised the City's Master List of Surveillance Technologies. ITD determined that the technologies used by the Seattle Fire Department and Seattle City Light, which our office had been reporting on, do not meet the definition of surveillance

[1] Per SMC 14.18.020(F): "Any material update to an SIR, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance; non-material updates may be made to the SIR by a department without Council action so long as the change is clearly marked as such in the SIR."

technologies. We will no longer review these technologies and have closed the recommendations from previous audits.

Audit Objective

Our objective was to determine SDOT's compliance in calendar year 2024 with SMC 14.18 and the CCTV SIR. Specifically, we reviewed:

A. How the surveillance technology has been used, how frequently, and whether usage patterns are changing over time;

B. How often the surveillance technology or its data are being shared with other entities, particularly other governments;

C. How well data management protocols are safeguarding individual information;

D. How deployment of the surveillance technology impacted or could impact civil liberties or have disproportionate effects on disadvantaged populations, and how those impacts are being mitigated;

E. A summary of any complaints or concerns received by or known by departments about the surveillance technology and the results of any internal audits or other assessments of code compliance; and

F. Total annual costs for use of the surveillance technology, including personnel and other ongoing costs.

SEATTLE DEPARTMENT OF TRANSPORTATION CLOSED CIRCUIT TELEVISION CAMERAS

Technology Description

The Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) cameras are remotely controllable video cameras installed on traffic poles along major roads in Seattle. The SDOT Transportation Operations Center uses CCTV cameras to monitor traffic conditions and quickly respond to traffic issues. Other City departments use CCTV cameras to respond to emergencies and to monitor major city-wide events. The cameras provide live video or updated static images 24 hours a day on the Traveler Information Map, a website that displays real-time traffic conditions in Seattle. See our initial CCTV audit for more detailed information on the CCTV system.

Source: Seattle Office of City Auditor tour of SDOT Transportation Operations Center

Annual Usage Review Summary

A. Use and Trends

SDOT reported that since our last review, they have continued to expand their CCTV traffic study pilots using artificial intelligence (AI) technology.

In 2022, SDOT began their first CCTV AI pilot project with a Microsoft research team, which counted and classified vehicles for transit safety; this pilot ended in 2022. In 2024, SDOT worked with two vendors on three traffic study pilot projects that involve the use of AI technology. These new AI pilot projects also include the use of direct camera feeds and new computing devices, as well as data sharing agreements. See Appendix C for a table of SDOT's CCTV AI pilots active in 2024.

SMC 14.18.020(F) states that "…any material change in surveillance capabilities, such as through technology upgrades, requires an updated SIR [Surveillance Impact Report]."

We consider the addition of AI technology to SDOT CCTV cameras through the new computing devices to be a technological upgrade and therefore a material change. SDOT agreed with our assessment. As outlined in SMC 14.18.020(F), any material change in surveillance capabilities requires an updated SIR, which requires review and approval by the City Council. SDOT reported they are seeking a material update to the CCTV SIR to include the use of AI in their CCTV traffic study projects.

Recommendation 1

The Seattle Department of Transportation (SDOT) should complete its ongoing update of the Closed Circuit Television (CCTV) Traffic Cameras Surveillance Impact Report to reflect the material change of the introduction of artificial intelligence (AI) technology, as required by SMC 14.18. In addition, SDOT should develop a protocol for tracking pilot programs involving AI that use CCTV camera feeds and should maintain such tracking documentation for annual review by the Office of City Auditor.

B. Data Sharing

SDOT allows the following City entities to log into the CCTV camera control application (known as Cameleon):

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

SDOT said the Transportation Operations Center always maintains the highest level of camera control, and SDOT policy states that they can take over control from other departments if needed. SDOT reported that in 2023, it began limiting the ability to pan, tilt, and zoom the CCTV cameras to only SDOT groups and the Seattle Emergency Operations Center. SDOT staff also explained that the cameras have a programmable default position that resets automatically on a nightly basis, and a night crew checks the cameras to ensure they are reset.

Requirements in this section of the SMC include ensuring that the public has the most accurate and up-to-date information on how surveillance technologies are being used. In our review, we discovered that the current version of the SIR, which was updated to incorporate several recommended changes from our initial review, was not posted to the City's website on the Adopted Surveillance Impact Report Register webpage.

Recommendation 2

The Seattle Department of Transportation (SDOT) should work with the Seattle Information Technology Department to ensure the most current version of the SDOT Closed Circuit Television Traffic Cameras Surveillance Impact Report is posted on the City's public website.

Recommendation 3

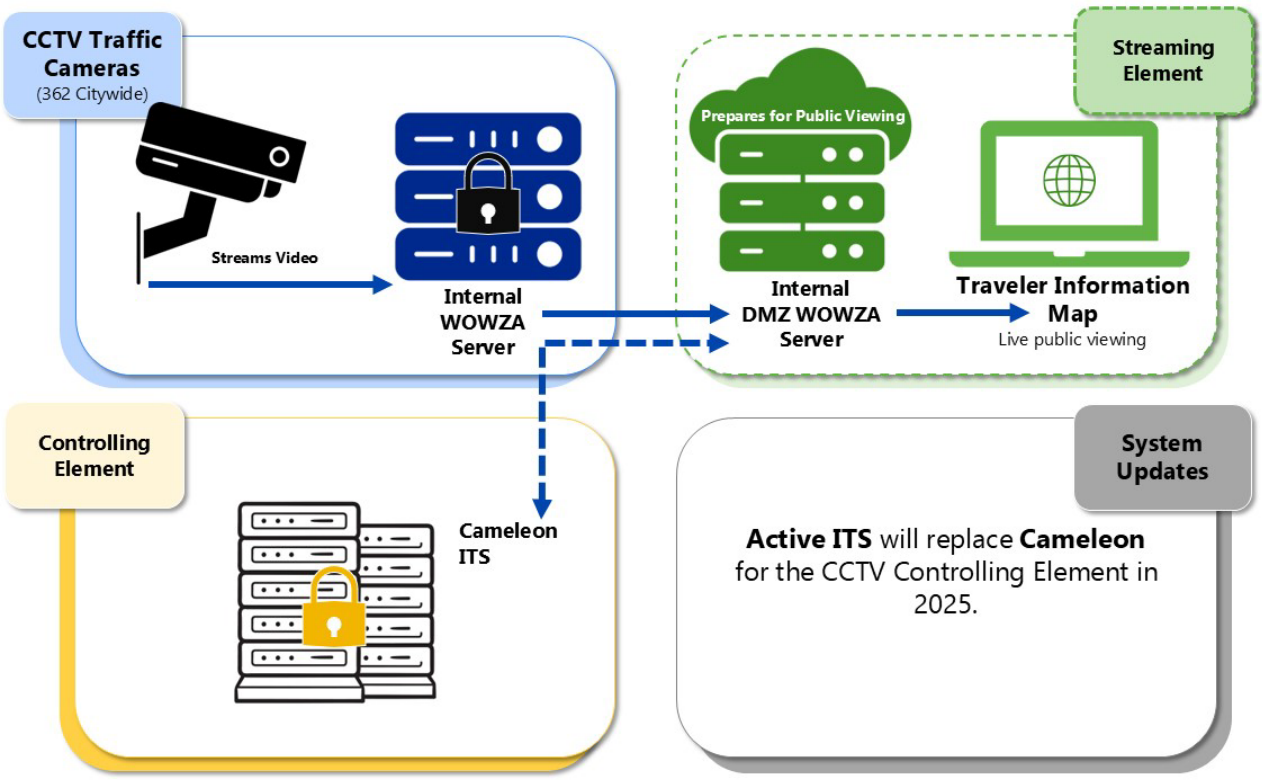
The Seattle Department of Transportation (SDOT) should develop a process and checklist to ensure that future revisions to the SDOT Closed Circuit Television Traffic Cameras Surveillance Impact Report are posted to the City's public website in a timely manner.

As noted in Section A. Use and Trends, SDOT reported the expansion of CCTV traffic studies and pilot programs using AI technology. These CCTV traffic study pilots use either the publicly available CCTV streams from the City's Traveler Information Map, or direct feeds to remote computing devices installed directly on the camera units. SDOT reported that it has implemented data sharing agreements with the vendors that are using direct camera feeds, as required by SMC 14.18.040B (subsection 3f). See Appendix C for a table of SDOT's CCTV AI pilot projects active in 2024.

C. Data Management Protocols

The CCTV SIR Section 3.0, Use Governance, states "Access to the camera control software (Cameleon) is managed by the [Transportation Operations Center] Technical Team who grant system privileges to individual users based on their operational needs." See Exhibit 1 below for a diagram of the SDOT CCTV system.

Exhibit 1: Seattle Department of Transportation CCTV System Diagram



Source: Seattle Office of City Auditor diagram of the Seattle Department of Transportation CCTV system.

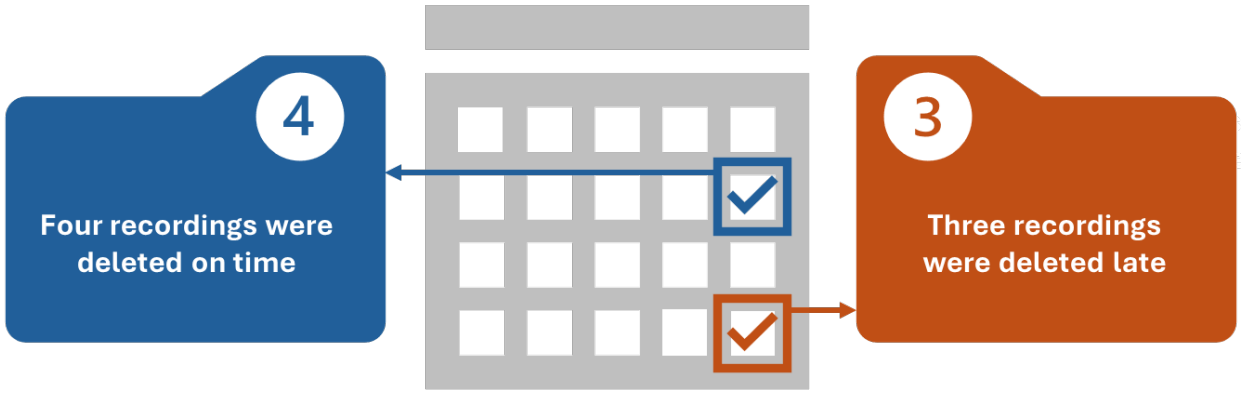
SDOT also has protocols that specify how CCTV traffic cameras and their data can be used. For example, these protocols allow the SDOT Transportation Operations Center (TOC) to record video for internal traffic studies and require employees to delete video files within 10 business days.

As part of this audit, we reviewed the CCTV camera recording logs for 2024, public-facing CCTV disable logs for 2024, current SDOT CCTV camera policies, and CCTV system access logs for August-December 2024.

CCTV Camera Recording Logs: In 2024, TOC staff reported that they received seven requests for CCTV camera recordings for various SDOT traffic studies. Of those seven requests, four recordings were deleted according to the 10-day requirement. However, logs show that three recordings were kept beyond their expiration date (see Exhibit 2). The latest a recording was deleted was 20 business days.

We also noted that in SDOT's CCTV camera policy for managing recordings, there are conflicting instructions for staff on how to manage the retention and deletion of video recording files.

Exhibit 2: Number of SDOT CCTV Recordings Complying with Required Deletion Time, 2024



Source: Seattle Office of City Auditor analysis of Seattle Department of Transportation recording deletion log data.

Public CCTV Camera Disable Log: In 2024, SDOT reported on their public-facing CCTV camera feed deactivation log that there were three dates when cameras were disabled for security reasons: May 10, May 11, and June 1.

SDOT CCTV Camera Policy: We reviewed and tested SDOT's protocols for camera control, recording procedures, and the TOC Operations Manual. We found that the SDOT CCTV camera policy and TOC Operations Manual were not in compliance with the City of Seattle Information Technology (IT) Security Policy regarding access control and account management. This could put the CCTV system at risk for unauthorized access.

We alerted SDOT to these IT security issues, which they said they addressed immediately. We also noted that the current SDOT CCTV camera policy states that the SDOT CCTV User Agreement must be reviewed and re-signed annually by all authorized users. However, SDOT reported that they only have staff sign the CCTV User Agreement when their access is initially authorized.

Our office previously identified a need for SDOT to improve its cybersecurity and data management practices. Specifically, in our initial CCTV review in 2021, we recommended that SDOT "should engage cybersecurity experts to conduct regular security assessments of the CCTV traffic cameras system and to follow up on the implementation progress of a 2015 network security risk report. The regular security assessments should specifically address data security and the risk of CCTV traffic cameras data being inadvertently or improperly shared. This work could be done by the City of Seattle's Information Technology Department or by an independent cybersecurity consultant."

During our 2022 Annual Surveillance Technology Usage Review, SDOT shared that they had "an active engagement with assigned Seattle Information Technology Department (ITD) cybersecurity experts. This includes recurring meetings to review practices and technologies while providing guidance for improving SDOT's overall security posture." As such, we reported that this recommendation was implemented. However, we believe the significant security issues we identified in this review warrant additional attention and collaboration between SDOT and ITD.

Recommendation 4

The Seattle Department of Transportation should update the Closed Circuit Television (CCTV) camera policy and the Transportation Operations Center Operations Manual to 1) ensure they meet or exceed the requirements set by City Information Technology Security Policy 201, 2) clarify recording retention and deletion procedures for staff, and 3) reflect current practices for when authorized users sign the CCTV User Agreement.

CCTV Camera Control System Access Logs (Cameleon Logs): We reviewed the CCTV camera control system access logs provided by SDOT for August to December 2024. SDOT management reported that due to a software upgrade to the CCTV system, logs were not maintained from January to July 2024. According to the City Records Manager, SDOT is required to retain CCTV system access logs for six years, per the state's retention schedule. SDOT staff reported that they resolved the records retention issue.

Also in 2024, SDOT purchased new CCTV camera control system software called ActiveITS to replace its current system, Cameleon. SDOT has partially implemented the new ActiveITS system, which will log who accesses the SDOT CCTV cameras, as well as any pan, tilt, or zoom changes made to camera positions. SDOT reported that no logs were maintained from ActiveITS testing and implementation in 2024.

We noted similar issues with records retention in our initial CCTV review in 2021. In that report, we recommended that SDOT "work with the City Records Manager and the City Auditor to identify the appropriate retention and ensure it is listed correctly on the SDOT retention schedules so that Cameleon logs meet both the City's recordkeeping requirements and maintain availability of the logs for the City Auditor's Office to complete annual surveillance usage reviews of the CCTV technology."

SDOT had reported in 2023 that they had "created a retention schedule for Cameleon Logs that requires the logs be retained for 2.5 years." However, during our testing of 2024 logs we discovered this retention schedule was not being followed. This hinders the ability to ensure oversight and accountability that the SDOT CCTV system is only being used by those who are authorized.

Recommendation 5

The Seattle Department of Transportation should ensure that the ActiveITS software logs and Cameleon logs both meet the City's records retention requirements and should maintain the logs for annual review by the Office of City Auditor.

We compared the available CCTV camera control system access logs (Cameleon logs) against the current authorized users list. We identified 96 instances of an account with the name "user" accessing the CCTV system. We found 10 other instances of an unknown account accessing the CCTV system from a workstation not listed as an authorized computer. Based on our review of the available logs, it was not clear who had access to administrative-level and shared accounts. This creates a lack of transparency around who is accessing the SDOT CCTV system and for what purpose. We also found at least seven users, who SDOT identified

as "mission critical," missing from the list, including one Cameleon system contractor.

Recommendation 6

The Seattle Department of Transportation (SDOT) should regularly update and maintain the list of users and computers authorized to access the Closed Circuit Television (CCTV) camera systems: 1) to ensure accuracy and transparency, 2) to ensure that only authorized users are accessing the systems for authorized purposes as required by the SDOT CCTV Traffic Cameras Surveillance Impact Report, and 3) for annual review by the Office of City Auditor.

Recommendation 7

The Seattle Department of Transportation (SDOT) should maintain a list of individuals who have login information for shared accounts. SDOT should also adhere to City policies for system access, including ensuring that users of the Closed Circuit Television camera systems use their individual login credentials unless administrative access is specifically required.

D. Impacts on Civil Liberties

In our initial CCTV review in 2021, we recommended that SDOT "should begin consistently documenting the rationale for its decisions about where to locate new CCTV cameras." In 2022, SDOT reported that they implemented this recommendation by adding a new section to their CCTV camera policy, "Rationale for CCTV Locations." However, in interviews for this review process, SDOT staff explained that although they had created this policy it had not yet been implemented. We found that they had not been documenting the rationale for new CCTV camera placement decisions, in the new policy section or elsewhere.

The rationale behind where new CCTV cameras are placed is important information for the City's Chief Technology Officer to consider in their annual equity impact assessment, as required by SMC 14.18.050. This code section specifies that the equity impact assessment should address, among other items, "whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies."

In response to our requests, SDOT developed a document in the third quarter of 2025 that contains the rationale for the placement of new cameras in 2024. Going forward, SDOT should develop and maintain this document as new cameras are installed, rather than completing it in the following year retroactively.

Recommendation 8

The Seattle Department of Transportation should consistently and promptly document the rationale for the locations of new Closed Circuit Television cameras and should maintain the documentation for annual review by the Office of City Auditor.

E. Complaints, Concerns, and Other Assessments

SDOT standard operating procedures require the Transportation Operations Center to document all inquiries they receive about CCTV cameras and to respond to them within three business days. We received a log from SDOT with three CCTV-related inquiries in 2024. We also reviewed comments, complaints, and inquiries received by the City's Customer Service Bureau in 2024 and found nine additional inquiries and complaints related to CCTV traffic cameras. None of the 12 inquiries were complaints or concerns about individual privacy or civil liberties (see Exhibit 3). Per 14.18.060, we are also required to report on the results of any internal audits or other assessments of code compliance; we did not identify any other audits or assessments related to CCTV traffic cameras for 2024.

Exhibit 3: Types of Customer Inquiries About CCTV Traffic Cameras, January-December 2024

Inquiry Type	Number of Inquiries
Request for camera footage	6
Report of camera or website not working as intended	4
Request to install a traffic camera at specific location	1
Question related to CCTV project ownership	1
Total	12

Source: Seattle Office of City Auditor analysis of the Seattle Department of Transportation's Customer Service Request System and the City of Seattle Customer Service Bureau database of comments and complaints.

F. Total Annual Costs

SDOT reported the estimated total cost for the CCTV traffic cameras operation in 2024 was $2,571,304. This total includes the costs of personnel and technology, and a portion of the cost for the new ActiveITS control system, as summarized in Exhibit 4.

Exhibit 4: Estimated Costs of Operating the CCTV System, 2024

Cost Description	Amount
Annual license fees	$33,589
Annual personnel costs*	$2,135,681
Annual maintenance costs	$83,704
Cameras purchased	$107,973
One Time Costs – 2024 Portion of ActiveITS	$210,357
Total	**$2,571,304**

Source: Seattle Office of City Auditor analysis of Seattle Department of Transportation data. * SDOT provided these estimated personnel costs based on how often the Transportation Operations Center staff use the CCTV system.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

Our audit objective was to determine the Seattle Department of Transportation's compliance with Seattle Municipal Code 14.18 and the Surveillance Impact Report for Closed Circuit Television camera technology in Calendar Year 2024. Specifically, we reviewed:

A. How the surveillance technology has been used, how frequently, and whether usage patterns are changing over time.
B. How often the surveillance technology or its data are being shared with other entities, including other governments in particular.
C. How well data management protocols are safeguarding individual information.
D. How deployment of surveillance technologies impacted or could impact civil liberties or have disproportionate effects on disadvantaged populations, and how those impacts are being mitigated.
E. A summary of any complaints or concerns received by or known by departments about their surveillance technology and the results of any internal audits or other assessments of code compliance.
F. Total annual costs for use of the surveillance technology, including personnel and other ongoing costs.

Scope

The scope for this audit included activities from January to December 2024 and covered the following technologies:

- Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) Cameras

Methodology

To accomplish the audit's objectives, we performed the following:

- Reviewed the Seattle Municipal Code, relevant Surveillance Impact Reports, CCTV system access logs, department policies & procedures, and previous audits
- Obtained cost data for the use of CCTV technology
- Analyzed complaints and concerns to City about CCTV technology
- Interviewed department officials
- Toured the SDOT Transportation Operations Center

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX A

List of Recommendations

Recommendation 1 The Seattle Department of Transportation (SDOT) should complete its ongoing update of the Closed Circuit Television (CCTV) Traffic Cameras Surveillance Impact Report to reflect the material change of the introduction of artificial intelligence (AI) technology, as required by SMC 14.18. In addition, SDOT should develop a protocol for tracking pilot programs involving AI that use CCTV camera feeds and should maintain such tracking documentation for annual review by the Office of City Auditor.

Recommendation 2 The Seattle Department of Transportation (SDOT) should work with the Seattle Information Technology Department to ensure the most current version of the SDOT Closed Circuit Television Traffic Cameras Surveillance Impact Report is posted on the City's public website.

Recommendation 3 The Seattle Department of Transportation (SDOT) should develop a process and checklist to ensure that future revisions to the SDOT Closed Circuit Television Traffic Cameras Surveillance Impact Report are posted to the City's public website in a timely manner.

Recommendation 4 The Seattle Department of Transportation should update the Closed Circuit Television (CCTV) camera policy and the Transportation Operations Center Operations Manual to 1) ensure they meet or exceed the requirements set by City Information Technology Security Policy 201, 2) clarify recording retention and deletion procedures for staff, and 3) reflect current practices for when authorized users sign the CCTV User Agreement.

Recommendation 5 The Seattle Department of Transportation should ensure that the ActiveITS software logs and Cameleon logs both meet the City's records retention requirements and should maintain the logs for annual review by the Office of City Auditor.

Recommendation 6 The Seattle Department of Transportation (SDOT) should regularly update and maintain the list of users and computers authorized to access the Closed Circuit Television (CCTV) camera systems: 1) to ensure accuracy and transparency, 2) to ensure that only authorized users are accessing the systems for authorized purposes as required by the SDOT CCTV Traffic Cameras Surveillance Impact Report, and 3) for annual review by the Office of City Auditor.

Recommendation 7 The Seattle Department of Transportation (SDOT) should maintain a list of individuals who have login information for shared accounts. SDOT should also adhere to City policies for system access, including ensuring that users of the Closed Circuit Television camera systems use their individual login credentials unless administrative access is specifically required.

Recommendation 8 The Seattle Department of Transportation should consistently and promptly document the rationale for the locations of new Closed Circuit Television cameras and should maintain the documentation for annual review by the Office of City Auditor.

APPENDIX B

Department Response

We provided a draft of this report to the Mayor's Office and the Seattle Department of Transportation (SDOT) for review. SDOT provided the following response on September 26, 2025:

> "We appreciate the Office of City Auditor's thorough review of SDOT's use of Closed-Circuit Television (CCTV) technology in 2024. We find the audit's findings and recommendations to be reasonable and constructive.
>
> SDOT is committed to improving transparency, data governance, and compliance with Seattle Municipal Code 14.18. We acknowledge the areas identified for improvement, including documentation practices, data retention, system access controls, and the integration of artificial intelligence into our CCTV operations.
>
> In response, we are organizing our remediation efforts into three implementation schedule categories based on complexity and required coordination:
>
> **Immediate Actions** *(underway or to be completed by end of Q4 2025)*
>
> - **Recommendation 2:** Ensure the most current version of the Surveillance Impact Report (SIR) is posted on the City's public website.
> - **Recommendation 3:** Develop a process and checklist to ensure timely posting of future SIR revisions.
> - **Recommendation 5:** Ensure both ActiveITS and Cameleon system logs meet records retention requirements and are maintained for audit review.
> - **Recommendation 6:** Regularly update and maintain the list of authorized users and computers accessing the CCTV system.
>
> **Near-Term Actions** *(targeted for completion by end of Q1 2026)*
>
> - **Recommendation 4:** Update the CCTV camera policy and TOC Operations Manual to align with City IT security policies and reflect current practices.
> - **Recommendation 7:** Maintain a list of individuals with access to group accounts and ensure compliance with City access policies.
> - **Recommendation 8:** Consistently document the rationale for new camera placements and maintain this documentation for annual review.
>
> **Longer-Term Actions** *(requiring additional interdepartmental coordination or system changes)*
>
> - **Recommendation 1:** Complete the update to the SIR to reflect the use of AI in CCTV pilot projects and establish a protocol for tracking these pilots.
>
> We are actively working to implement these improvements ahead of the next annual review and will continue to collaborate closely with the Office of City Auditor to ensure full compliance, transparency, and public trust. Thank you for your continued partnership."

APPENDIX C

Seattle Department of Transportation (SDOT) Closed Circuit Television Traffic Study Pilots Using Artificial Intelligence, Active in 2024

Pilot Technology Vendor Name	Funding Source	Pilot Details	CCTV Camera Source Feed	Data Sharing Agreement?	Pilot Status / Outcome
Currux Vision	SDOT Operational Funds	Three Currux servers, each can run four camera feeds. Used on busy arterials to count and classify vehicle traffic.	Public	NO	Started in 2022. Ongoing pilot. Reduced exposure of staff to the dangers of busy arterials.
Derq	Federal Grant Funds (Federal Highway Administration / UW Multimodal Integrated Corridor Mobility for All (MICMA) Grant)	Located at 15th Ave. NE and NE 43rd St. Two dedicated cameras directly feed to one Derq edge computing device. Collects anonymous statistics on traffic volumes, speeds, vehicle class, and pedestrian counts; records 15-second clips of near-miss incidents.	Direct	YES	Started in 2022. Ongoing pilot. Grant ended in 2025. Decision pending to maintain system with operational funds or to end the program.
Derq	Federal Grant Funds (U.S. Department of Transportation MLK SMART Grant with Sound Transit)	Located at S. Alaska St. and Martin Luther King Jr. Way S. Two dedicated cameras and a Derq edge computing device in 2023.	Direct	YES	Started in 2023. Ongoing pilot. All six intersections on Martin Luther King Jr. Way S. covered by the grant were scheduled to be installed by August 2025.

Source: Seattle Department of Transportation

APPENDIX D

Seattle Office of City Auditor Mission, Background, and Quality Assurance

Our Mission:
We conduct independent analyses of City programs and services with an equity and social justice perspective, making recommendations on ways the City can better serve the people of Seattle.

Background:
Seattle voters established our office by a 1991 amendment to the City Charter. The office is an independent department within the legislative branch of City government. The City Auditor reports to the City Council and has a four-year term to ensure their independence in deciding what work the office should perform and reporting the results of this work. The Office of City Auditor conducts performance audits and non-audit projects covering City of Seattle programs, departments, grants, and contracts. The City Auditor's goal is to ensure that the City of Seattle is run as effectively, efficiently, and equitably as possible in compliance with applicable laws and regulations.

How We Ensure Quality:
The office's work is performed in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. These standards provide guidelines for audit planning, fieldwork, quality control systems, staff training, and reporting of results. In addition, the standards require that external auditors periodically review our office's policies, procedures, and activities to ensure that we adhere to these professional standards.

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