

City of Cottonwood, Arizona
Agenda Communication



Meeting Date: September 22, 2026
Subject: Presentation to the City Council regarding the Flock Safety Automated License Plate Reader system and how it has been operated by the Cottonwood Police Department; discussion of the same among members of the Council and between Council and City staff
Department: Police Department
From: Jennifer Mathe
Strategic Pillar:

REQUESTED ACTION

Presentation to Council by City staff and Council discussion of the same, including Council questions to City staff

SUGGESTED MOTION

N/A – Discussion among Council and between Council and City staff.

BACKGROUND

At the August 4, 2026, City Council meeting, after much public comment, the Council agreed on a future agenda item for a presentation to the City Council, regarding the Flock System, in order to provide the community with more information about its operation, data retention practices, and privacy safeguards.

It is the mission of the Cottonwood Police Department to enhance the safety and well-being of the community through partnerships, professionalism, compassion, and integrity, with an unwavering commitment to reduce crime and protect the quality of life. In order to achieve our mission, the Cottonwood Police Department is committed to providing the tools, training, and accountability necessary to effectively serve our community. We also recognize that we cannot be successful without the trust of the community we serve.

The Cottonwood Police Department has a contract with Flock Safety for Automated License Plate Readers (ALPR), which are currently disabled. There are eleven fixed solar cameras within the city limit; when operating, these cameras utilize cellular technology. These cameras typically capture digital images of the rear of the vehicle including the license plate and rear

vehicle exterior characteristics, and these images are stored along with the date, time, and location of capture. The images and associated license plate information are then stored, for a period of 30 days, and may be accessed only for legitimate law-enforcement-related investigations.

The system allows Cottonwood Police Department officers to place a license plate number on a “hot list.” This is only done when a plate is associated with a law enforcement incident, which could include a criminal investigation or a missing juvenile or person. When a license plate is entered on a hot list, officers receive an alert if that vehicle passes one of the City’s ALPR cameras. The system can also alert officers when a stolen vehicle or a vehicle identified on another agency’s hot list passes an ALPR camera.

To clarify any possible misconceptions, the Flock ALPR platform that has been utilized by the Cottonwood Police Department does not include the following capabilities:

- It does not capture or provide information on the interior of the vehicle or occupants of the vehicle.
- The database does not store registered owner information and does not identify who is driving the vehicle.
- The cameras do not provide officers with a constant data feed. Information is only accessed for a lawful public safety purpose and each access is logged, which means a record is created every time an officer checks a plate.
- The cameras are not actively monitored and do not provide live video feed.
- Cottonwood PD officers are not authorized to stop a vehicle based solely on an ALPR alert. Officers are required to confirm the license plate, jurisdiction, status, and connection to the driver before taking enforcement action.

The City of Cottonwood recognizes that the community has expressed concerns regarding the use of the Flock ALPR system. The following are some of the main concerns that have been expressed to the Police Department, and some information in response to each.

There is a concern that Flock cameras are utilized as a mass surveillance tool and are used to track law-abiding members of the community. The City has deployed 11 cameras, the majority of which are placed in locations of ingress and egress points of the city. Police Department does not have the ability to track individuals throughout the city, and are only utilized for a law enforcement purpose. The limitations of the system are demonstrated by instances in which vehicles have been identified through ALPR information, searched based on independent legal authority, and ultimately not located. The cameras are not placed in areas to track individuals entering residential areas or entrances to businesses within the city. The cameras provide a point in time snapshot, and not constant movement through the city. The system is not capable of providing officers with continuous, real-time tracking of a vehicle.

There are concerns that the data can be misused and or abused by law enforcement personnel. The Department recognizes that instances of misuse of ALPR technology have occurred in Arizona, and across the nation. Abuse of authority is a concern for every law enforcement agency and is not unique to ALPR systems. When misconduct is identified, it must be addressed promptly, with appropriate consequences, to include termination and criminal charges when warranted. Before this system was suspended, the Cottonwood Police Department had implemented monthly audits to ensure employees were using the system appropriately and in accordance with department policy. ***To date, no misuse has been identified through these audits, and the audits would continue if the system were to go back into operation.***

The community has expressed concerns over the length of data retention. The Police Department currently retains its data for 30 days. This retention period can be reduced. The department established the 30-day retention period because there are circumstances in which a suspect vehicle is not identified until several days after the crime has occurred. Maintaining the information for a limited period allows the investigators an opportunity to review historical data when a vehicle or suspect is identified after the initial investigation. The Police Department is open to reducing the current retention period in order to address community concerns while balancing investigative needs.

There have also been concerns regarding the sharing of ALPR data with other law enforcement agencies. For much of the department's use of the ALPR system, data was shared with law enforcement agencies across the country. It is important to recognize that Cottonwood is a community visited by people from throughout the country, including individuals who travel extensively or live in their vehicles. In response to the concerns raised by the community, the department did reduce its sharing to Arizona agencies only. The Department is also open to eliminating data sharing and restricting access to Cottonwood Police Department employees.

There have been concerns expressed about the limited departmental policy related to the use of the ALPR system. In response to concerns raised by the community, the Department recently updated its ALPR policy.

The community has expressed concerns about transparency regarding the use of the ALPR system. The department recognizes the importance of transparency and had been preparing to launch a public transparency portal before the ALPR system was suspended. The portal is intended to be accessible through the City's website and would provide information including camera locations, the searches conducted on license plates to include the incident number and reason for each search.

Data security is a concern expressed from our community. Flock data security is ACJIS compliant, with metadata stored in AWS with AES-256 encryption. The data is stored in AWS GovCloud and the police department controls user access. Flock reported that there have not been any breaches of the Flock data; however, the department is aware of recent reports of a potential data breach which is concerning and warrants further review. The Department recognizes that data security must remain an ongoing priority.

There are numerous instances in which ALPR technology has assisted with law enforcement investigations and public-safety efforts. These include locating missing individuals, recovering stolen vehicles, assisting with an arrest in a bank robbery investigation, locating a homicide suspect, assisting in an investigation involving a large fraud ring, and assisting in the arrest of a subject wanted for aggravated sexual abuse of a child. These are only a few examples of cases in which ALPR information has assisted the Department in locating individuals, identifying vehicles, or advancing criminal investigations.

Ultimately, public trust is imperative to the success of a police department. The Department recognizes that the concerns raised by the member of the Cottonwood community must be taken seriously and addressed openly.

Recently, Attorney General Kris Mayes announced that the Arizona Attorney General's Office will conduct a review of ALPR technology and its impact on privacy rights. Additionally, legislation addressing ALPR systems and privacy is expected to be presented during the next legislative session. This reflects the concerns of citizens throughout Arizona and demonstrate that appropriate use of technology continues to be a public issue.

The Cottonwood Police Department recognizes that maintaining the community's trust is just as important as providing officers with effective tools to protect the community. The Department is committed to listening to community concerns, evaluating our practices, strengthening accountability, and making changes when appropriate.