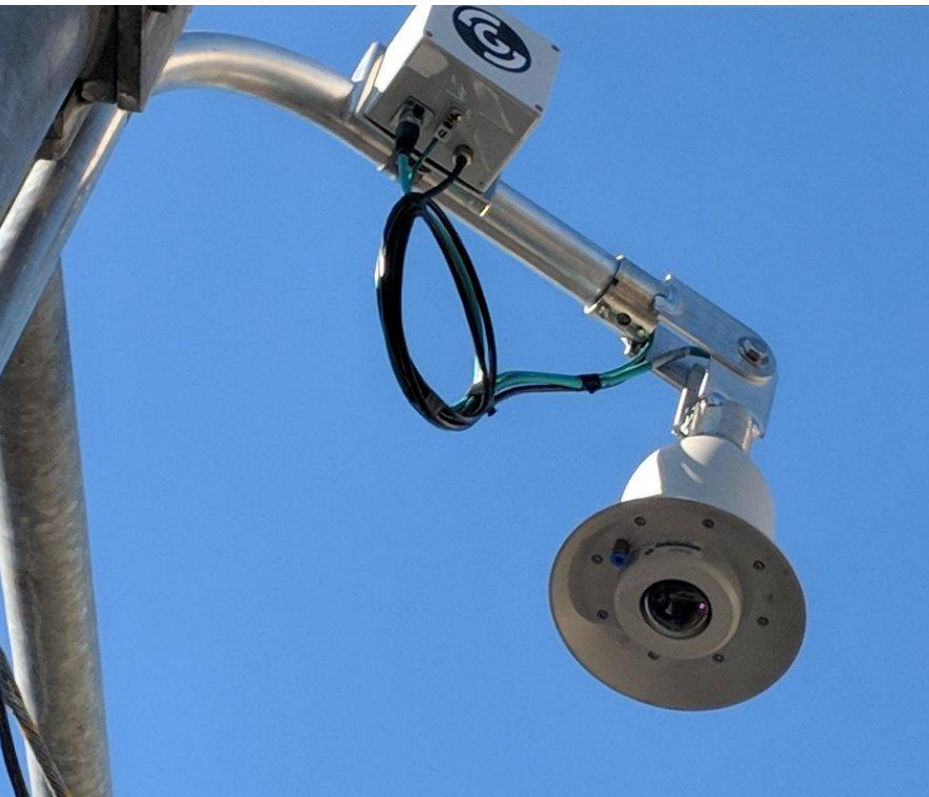


2025 Annual Surveillance Technology Usage Review



September 28, 2026

Andrew Scoggin

Sarah Bland

Arushi Thakorlal, Acting City Auditor



Seattle Office of City Auditor



2025 Annual Surveillance Technology Usage Review

REPORT HIGHLIGHTS

Background

This 2025 Annual Surveillance Technology Usage Review includes one technology: Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) cameras used to monitor traffic conditions. SDOT staff view live camera footage to detect and respond to traffic issues. The City's website transmits live camera feeds where the public can view traffic conditions. Traffic cameras are also used to respond to emergencies and to monitor major events.

What We Found

In accordance with Seattle Municipal Code 14.18, SDOT tracks associated costs and responds to customer inquiries regarding CCTV. SDOT also continues to implement recommendations made in our 2024 review regarding technology usage, data management, and impact on civil liberties. However, we found that SDOT does not yet have documented internal policies or procedures for working with the Seattle Police Department's Real-Time Crime Center regarding its use of SDOT's CCTV camera feeds, in accordance with best practices for coordination with law enforcement.

Recommendations

We make one new recommendation to address our finding and will continue to follow up on previous recommendations.

Department Response

In its formal, written response to our report, SDOT stated that it concurred with the report findings. See Appendix A 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 the City about CCTV technology
- Interviewed City officials
- Toured the SDOT Transportation Operations Center

Seattle Office of City Auditor

Arushi Thakorlal, Acting City Auditor

www.seattle.gov/city-auditor

TABLE OF CONTENTS

Introduction.....	1
Seattle Department of Transportation Closed Circuit Television Cameras	4
Objectives, Scope, and Methodology.....	17
Appendix A.....	19
Department Response	19
Appendix B	20
List of Recommendations and Department Response	20
Appendix C	21
Recommendations from our 2024 Annual Surveillance Technology Usage Review of SDOT CCTV Traffic Cameras (Status as of May 2026 Recommendation Follow-up Report).....	21
Appendix D.....	23
CCTV Traffic Study Pilots Using Artificial Intelligence Reported by SDOT, Active in 2025	23
Appendix E.....	25
Seattle Office of City Auditor Mission, Background, and Quality Assurance.....	25

INTRODUCTION

Background

[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 the applicable SMC provisions. After initial surveillance technology reviews, the City Auditor reports its annual review of technologies in a single Annual Surveillance Technology Usage Review report.

This 2025 Annual Surveillance Technology Usage Review includes one technology: Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) traffic cameras.

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."

The [initial audit report](#) on SDOT CCTV traffic cameras was published June 30, 2021.

In our most recent [audit report](#) on SDOT CCTV traffic cameras, published on September 30, 2025, we made eight recommendations to SDOT. In May 2026, as part of our office's annual [recommendation follow-up process](#), we reported that SDOT had implemented two of those recommendations. Given the timing of our recommendations in 2025, we expected to observe some similar conditions during this year's review; in such situations, we have noted where there are relevant open recommendations, but we have not issued repeat recommendations. We will continue to track progress on all pending recommendations through our annual follow-up process. See Appendix C for a list of recommendations from our 2024 review.

The Seattle Information Technology Department (ITD) is responsible for determining which technologies used by the City are considered surveillance. On September 16, 2024, ITD issued a report that revised the City's Master List of Surveillance Technologies. ITD determined that technologies used by the Seattle Fire Department and Seattle City Light, which our office used to report on, do not meet the definition of surveillance technologies. We will no longer review these technologies and have closed the recommendations from previous audits.

Audit Objective

Our audit objective was to determine SDOT's compliance with SMC 14.18 and the CCTV traffic camera SIR in calendar year 2025. 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; 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

The Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) traffic cameras are remotely controllable video cameras installed on traffic poles along major roads in Seattle. The SDOT Transportation Operations Center uses CCTV traffic 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 audit](#) for more detailed information on the CCTV system.



Source: Office of City Auditor tour in 2026 of the renovated SDOT Transportation Operations Center.

Annual Usage Review Summary

A. USE AND TRENDS

Updates to SDOT CCTV camera Surveillance Impact Report:

During last year's review, given the department's increased use of artificial intelligence (AI) for traffic studies, we recommended that SDOT update the Surveillance Impact Report for the CCTV traffic cameras. This year, SDOT reported that it has prepared a draft update of the report. The update process also includes public comment and approval by the City Council.

SDOT staff said they have shared the draft report with the Seattle Information Technology Department's (ITD) privacy team for review. Staff said they are working with ITD on a recommended timeline for going through the process of making material changes to the report, as required by the Surveillance Ordinance.

SDOT staff also reported that in the updated draft Surveillance Impact Report, they are now including additional cameras as part of the surveillance technology. These are cameras that they currently use for traffic studies and detecting vehicles at intersections. SDOT staff said their understanding was that these cameras did not originally qualify as a surveillance technology when the City reviewed SDOT technologies in response to the Surveillance Ordinance, because the cameras were passively detecting vehicles and their video was not being analyzed or shared. The cameras also do not pan, tilt, and zoom like the traffic cameras covered by SDOT's current Surveillance Impact Report. SDOT is now using AI technology to analyze video, which we describe later in this report.

Addition of SDOT CCTV cameras streams to the Real-Time Crime

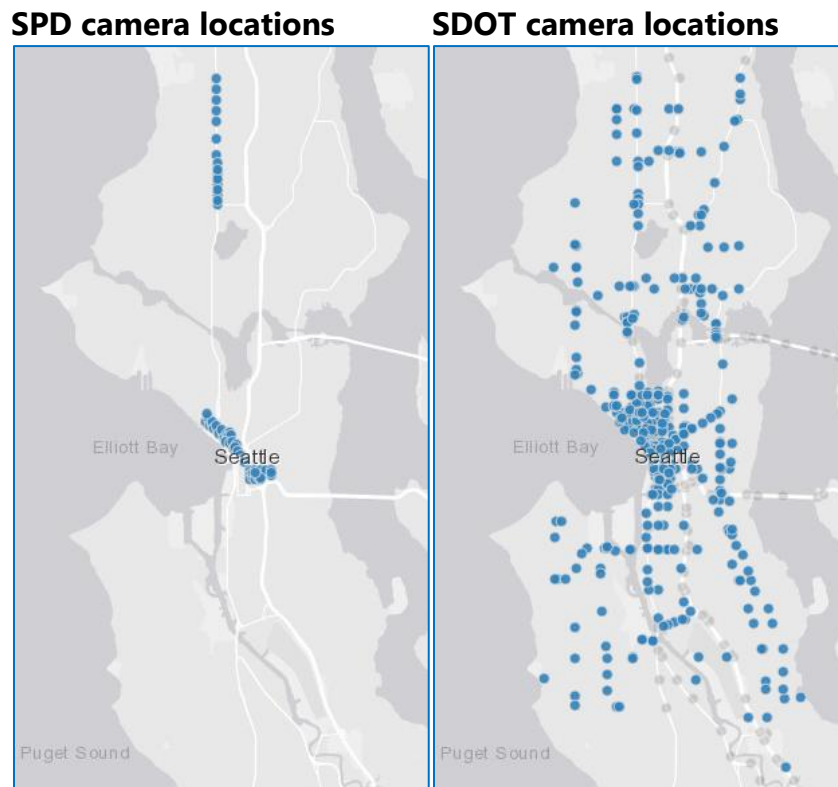
Center: In September 2025, the City Council passed an updated Surveillance Impact Report for the Seattle Police Department's (SPD) Real-Time Crime Center, adding use of SDOT's CCTV traffic cameras. The Real-Time Crime Center combines information such as camera views, 911 calls, and police officer location and overlays it on a map view to use for law enforcement. In November 2025, SDOT sent a list of cameras to SPD to integrate into the Real-Time Crime Center, which is also when SPD updated its platform to support access to the

In 2025, SDOT's CCTV traffic camera streams were added to the Seattle Police Department's Real-Time Crime Center

cameras. As of July 2026, SPD said that they had not integrated all SDOT cameras from the list into the Real-Time Crime Center system.

As part of this year's review, we interviewed SPD officials to learn how the Real-Time Crime Center is using the CCTV traffic camera streams. SDOT and SPD staff both reported that the Real-Time Crime Center has view-only access to the cameras and cannot move or zoom the camera views. SPD staff estimated that the traffic camera streams make up about 20 percent of the Real-Time Crime Center's total camera usage. As shown in Exhibit 1, SDOT's cameras have more coverage of Seattle geographically than SPD's own CCTV cameras.

Exhibit 1: Locations of SPD-owned Real-Time Crime Center cameras and SDOT CCTV traffic cameras



Source: Seattle Open Data Portal ArcGIS map screenshots of SPD camera locations (left) and SDOT CCTV traffic camera locations (right), as of July 31, 2026

The current Surveillance Impact Reports for SPD's Real-Time Crime Center and for SDOT's CCTV traffic cameras contain conflicting statements regarding camera use. The Real-Time Crime Center report states that SDOT's cameras will be used "for law enforcement purposes." However, the current report for

SDOT's CCTV cameras states they "shall not be used for civil or criminal enforcement purposes." City staff advised that SDOT's report—approved by City Council in 2019—did not necessarily need to be amended to allow SPD access for law enforcement because the Real-Time Crime Center report was approved more recently by Council. SDOT's policy document governing use of its CCTV cameras says that other departments "are permitted to leverage SDOT's live video streams and associated data for agency-specific purposes." We provide more information regarding the Real-Time Crime Center's use of SDOT's CCTV traffic cameras in Sections B and C.

Use of artificial intelligence: SDOT continued its use of AI technology in 2025 to conduct traffic studies. This technology is used to automatically detect traffic incidents or near misses and creates short clips of such incidents. We provide more information about these recordings in Section C. SDOT clarified that the AI technology is applied to the camera stream only when it is being processed by the internal system and is only available to authorized SDOT staff through their AI vendor-provided dashboard and servers.

SDOT operates cameras using AI technology to automatically detect and record traffic incidents or near misses

SDOT reported that in August 2026, it had 61 cameras that were not already part of the CCTV traffic camera system that specifically used this AI technology; an additional 13 CCTV traffic camera feeds were shared with the AI technology as of July 2026, which SDOT said was a typical amount. See Appendix D for a full list of AI pilot projects.

B. DATA SHARING

City entities using SDOT CCTV cameras: SDOT provided the following list of City entities that had access to the CCTV traffic camera system during 2025. The department noted that only the SDOT entities on this list have access to control the cameras:

1. SDOT Maintenance and Operations, Dispatch
2. SDOT Traffic Control Plan and Special Events Review
3. SDOT Traffic Signal Shop
4. SDOT Traffic Signal Timing Engineers
5. SDOT Transportation Operations Center
6. Seattle Fire Alarm Center

7. Seattle Emergency Operations Center
8. Seattle Executive Protection Unit
9. Seattle Police Operations Center
10. Seattle Police Department, Real-Time Crime Center

There are two new entities reported to have system access in 2025: SDOT's Traffic Control Plan and Special Events Review group and SPD's Real-Time Crime Center. As described in Section A, an updated Surveillance Impact Report for the Real-Time Crime Center in 2025 added use of SDOT's cameras.

According to both departments, a Microsoft Teams chat was created in February 2026 specifically for communication between staff in SDOT's Transportation Operations Center and SPD's Real-Time Crime Center. Real-Time Crime Center staff use this chat to ask SDOT to move the cameras. SDOT reported that this Teams chat has a message pinned at the top that provides information on the purpose of the chat, what SDOT is allowed to do with its cameras, and guidance on what information the Real-Time Crime Center staff should provide SDOT. The pinned message also says that SDOT will manage its cameras according to what is allowed under its Surveillance Impact Report, which states that the cameras "shall be used to monitor conditions on SDOT-owned roadways" and not on sidewalks or private property.

Federal best practices recommend having written agreements between agencies when transportation-specific cameras are used by law enforcement

A federal best practices report, cited in the SDOT CCTV Traffic Cameras Surveillance Impact Report, recommends having written agreements between agencies when transportation-specific cameras are used by law enforcement, and discussing and documenting such use. SDOT and SPD did not appear to have a documented agreement regarding the Real-Time Crime Center's use of the CCTV cameras at the time SDOT sent the list of camera streams to SPD in November 2025 nor at the time of this report's publication. SDOT and SPD staff said they have met multiple times regarding the center's integration of the cameras, including a meeting in September 2025 that SDOT said included the police chief and the SDOT director after City Council passage of the updated Real-Time Crime Center Surveillance Impact Report. A documented agreement regarding the Real-Time Crime Center's use of

SDOT's CCTV cameras could help ensure that its use conforms to applicable laws and policies.

SPD told us that the lack of a documented agreement regarding its use of the CCTV traffic cameras is reflective of the fact that the camera streams are already publicly accessible. SDOT explained that the Real-Time Crime Center has access to internal streams of SDOT cameras that are similar to the public streams. However, when we asked about the list of cameras SDOT provided to SPD, SDOT said the list also includes the traffic detection cameras that are not available on the public SDOT map. According to SDOT, these cameras were unintentionally included when SDOT provided the list to SPD. SDOT said that it is currently working to remove those camera streams from the Real-Time Crime Center.

While SDOT controls how its cameras are operated, it appears to have limited authority to dictate how SPD uses the camera feeds or streams. However, SPD's use of these feeds for law enforcement purposes introduces additional civil liberties considerations and impacts. As a result, decisions that SDOT makes regarding the CCTV traffic cameras, such as where to install new cameras, could have unintended consequences for Seattle residents.

SDOT controls how its cameras are operated, but it appears to have limited authority to dictate how SPD uses the camera feeds

Additionally, SDOT has not yet updated its operating procedures to include information about how to work with the Real-Time Crime Center. In the absence of a documented interagency agreement, department-specific policies or procedures could help ensure that SDOT is internally managing all communication and coordination with the Real-Time Crime Center consistent with the Surveillance Impact Report. As part of this year's audit, we reviewed an updated version of the manual for employees who work in SDOT's Transportation Operations Center and manage the CCTV traffic cameras. The manual mentions the Real-Time Crime Center as one of many City partners outside of SDOT, but it did not contain procedures describing how to coordinate specifically with the Real-Time Crime Center at the time of this report's publication. SDOT staff also shared that they do not have a formal protocol for sharing new SDOT CCTV camera feeds with the Real-Time Crime Center in the future.

Artificial intelligence vendors: SDOT has contracts with two vendors—Derq and Currux—to use AI technology to analyze camera feeds as part of traffic studies. The contract with one vendor, Derq, states that the City has “full ownership of the data outright.” There is also a clause that states that for work using federal funds, the federal government “has the right to” obtain the data and to authorize others to receive it as well. SDOT reported that it used two federal grants on projects involving Derq technology. SDOT said that this is a required provision for receiving federal grant funding and that using federal funds is a standard best practice.

Recommendation 1

The Seattle Department of Transportation (SDOT) should document its internal policies and procedures for coordinating with the Real-Time Crime Center. This should include the following:

- a. Procedures for responding to requests from the Real-Time Crime Center to move or zoom cameras, including defining when and where they can be moved;**
- b. SDOT’s policy for sharing new camera feeds with the Real-Time Crime Center; and**
- c. Updated criteria for selecting new camera locations, including whether and how to incorporate feedback from the Seattle Police Department, and ensuring criteria on selecting camera locations incorporate principles of the City’s Race and Social Justice ordinance.**

C. DATA MANAGEMENT PROTOCOLS

Systems used to control cameras: In 2025, SDOT implemented a new system to control CCTV cameras called ActiveITS. The current system, Cameleon, is being phased out. SDOT staff said that Cameleon is currently being used to control only some portable cameras and that 2026 will be its last year in use.

Review of access logs: As part of last year’s review, we found that system access logs were not maintained by SDOT for all of 2024 and subsequently recommended that SDOT maintain such records for annual review. For this year’s audit, SDOT provided

logs for Cameleon use for all of 2025 and for the time period that ActiveITS was in use during the year.

We also recommended during last year's review that SDOT regularly update and maintain a list of users and devices authorized to access the system. This year, we compared both Cameleon and ActiveITS access logs with lists of approved users and devices.

We found 412 instances of the username "user" in the Cameleon logs in 2025, similar to an issue that we identified in our 2024 review. These logins were associated with six devices: three workstations in the Transportation Operations Center and three laptops associated with individual SDOT employees. The username "user" appears in the approved Cameleon list, but the list does not provide details about it. SDOT said that this login was disabled shortly after last year's review. The "user" login was used only seven times following publication of last year's report, the latest being October 8, 2025.

The list of authorized users for ActiveITS does not include a comparable "user" login. Each entry in the ActiveITS access log appears directly tied to an individual. Since SDOT is phasing out Cameleon and using only ActiveITS moving forward, it appears that this issue will not continue to occur in future years.

Security issue in Transportation Operations Center manual:

During last year's review, we identified a security issue in the manual used by staff in SDOT's Transportation Operations Center who control the CCTV traffic cameras. SDOT provided an updated manual as part of this year's review, and the security issue appears to be resolved.

Recordings created by SDOT: SDOT only records feeds of the CCTV traffic cameras when it receives a specific request, such as for a traffic study. The recordings are created through a system called Wowza, which saves recordings on a City network drive. SDOT then moves the recordings to a SharePoint folder for the requestor to access. SDOT's Transportation Operations Center manual provides instructions on how to create and maintain recordings, including when to delete them.

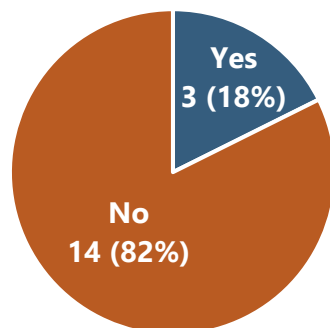
We found that there is a minor inconsistency between the Surveillance Impact Report and the employee manual regarding deletions of recordings. The report states 10 business days, while the manual states simply 10 days without distinguishing between business or calendar days.

For last year's review, we analyzed recordings from 2024 and found some were not deleted timely, resulting in a recommendation to SDOT to clarify deletion procedures. This year, we performed a similar analysis and again found that not all recordings were deleted in line with policies. SDOT provided us with a list of 17 recordings it created in 2025. Just 3 of 17 recordings were deleted within 10 calendar days, and 7 of 17 were deleted within 10 business days. The longest it took to delete a recording was 42 calendar days.

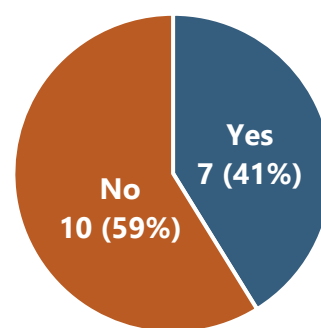
According to SDOT, videos did not automatically delete from SharePoint correctly in the first half of 2025, causing retention issues. SDOT said this deletion issue was fixed after we published last year's review in September 2025 and that videos are now deleted in line with policy. In our analysis, we found that the last 5 recordings of 2025, all created from late September onward, were deleted from SharePoint after either 10 or 11 calendar days.

Exhibit 2: Number of SDOT CCTV recordings complying with required deletion time, 2025

Recordings deleted within 10 calendar days



Recordings deleted within 10 business days



Source: Office of City Auditor analysis of SDOT's 2025 recording log data.

Recordings created by SPD: During this year's review, SPD officials told us that the Real-Time Crime Center system

automatically creates a 24-hour recording saved daily for every SDOT camera stream that is fed into the system. According to SPD, staff can create clips from these recordings as evidence for cases that get stored indefinitely. SPD said unused camera footage is automatically deleted and overwritten every 24 hours. This is a shorter retention period than what is stated in the Surveillance Impact Report for the Real-Time Crime Center, which states that, in general, data stored by the center's software will be kept for 30 days unless SPD keeps it as evidence.

The Real-Time Crime Center's practices appear to result in more recordings being created from traffic cameras as compared with SDOT's practice of manually creating recordings.

Recordings for AI technologies: As part of SDOT's traffic studies that use AI to analyze camera feeds, the technology automatically records brief clips of traffic-related incidents. SDOT accesses the video clips differently depending on the vendor. For one vendor, Derq, videos are accessed through an online dashboard. For the other vendor, Currux, the videos are accessed through a server installed within the City. Because the videos are automatically created, this appears to create significantly more recordings than when SDOT manually schedules and fulfills a request to create a video recording for a traffic study.

According to SDOT staff, videos using the Currux platform are deleted within 10 days, in line with the required retention period. SDOT staff said they had been working with Derq to consistently meet the 10-day requirement, and it appeared that Derq had done so as of July 2026.

Deactivated camera feeds: SDOT reported that it did not turn off the public feed of any cameras in 2025. In 2024, SDOT had disabled the feed on three dates for security reasons.

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 it implemented this recommendation by

adding a new section to its CCTV camera policy, “Rationale for CCTV Locations.” However, in last year’s review of 2024 technology usage, SDOT staff explained that this policy had not yet been implemented. We reviewed available documentation during last year’s audit to confirm that they had not been documenting the rationale for new CCTV camera placement decisions, as specified in the new policy section or elsewhere.

In our 2024 review, we recommended that SDOT should consistently and promptly document the rationale for the locations of new CCTV cameras. In the third quarter of 2025, SDOT developed a document that contained the rationale for the placement of new cameras in 2024. For our 2025 review, SDOT provided another document that contained the rationale for the placement of new cameras in 2025.

SDOT listed 37 cameras on its camera placement log for 2025. SDOT’s traffic camera policy states the placement log should be updated “upon installation.” However, the log does not contain a specific field for installation date, making it difficult to determine whether SDOT is updating the document timely. Consistently updating the log adds assurance that there is appropriate rationale for a camera’s location before installing it. SDOT explained the absence of dates in the log by noting that when it exports the list, the dates included do not necessarily reflect when the camera was installed but rather when the entry in the list was created or last modified.

We also identified some cameras that were not on the log but were on a [public GIS map](#) of SDOT camera locations. Without dates, we could not determine whether those cameras were installed in 2025 and therefore should have appeared on the installation log.

E. COMPLAINTS, CONCERNS, AND OTHER ASSESSMENTS

We received a log from SDOT with 15 CCTV-related inquiries that it received in 2025, up from 3 in 2024. We also reviewed comments, complaints, and inquiries received by the City’s [Customer Service Bureau](#) in 2025 and found 13 additional inquiries and complaints related to CCTV traffic cameras, up from 9 the year before. See Exhibit 3 for the types and numbers of inquiries.

Exhibit 3: Types of public inquiries about CCTV traffic cameras, 2025

Inquiry Type	Number of Inquiries
Request to install a traffic camera at specific location or view	10
Request for camera footage	8
Report of camera or website not working as intended	6
Report of camera pointing at potentially incorrect or inappropriate location	2
Question regarding what SDOT does with camera footage	2
Total	28

Source: Seattle Office of City Auditor analysis of Seattle Department of Transportation data and the City of Seattle [Customer Service Bureau](#) database of comments and complaints.

We identified three inquiries that had a nexus to privacy or civil liberties concerns. Two inquiries were reports of a camera pointing at a potentially incorrect or inappropriate location. These may have implications for privacy if the feeds were clearly showing private businesses or residences for any period of time. SDOT staff said that when they receive a report of a camera facing the wrong view, they check the camera feed and reposition it if needed. Staff also said that they do nightly checks of cameras and routinely correct camera angles.

Another inquiry didn't have a specific complaint about civil liberties but was inquiring about individuals' rights to see footage of themselves and how it may be used by the police. In response to this inquiry, SDOT clarified that the department does not record video feeds unless for an approved traffic study and that footage is destroyed within 10 days; if specific footage is still available when requested, SDOT will provide it according to public disclosure laws. SDOT also recommended that the individual inquire with the City Attorney's Office for more specific legal questions.

Per SMC 14.18.060, we are also required to report on the results of any internal audits or other assessments of code compliance. The Seattle Office of Inspector General for Public Safety (OIG) conducts reviews of surveillance technologies used by SPD. OIG is conducting a review of SPD's Real-Time Crime Center technology in 2026. OIG publishes its surveillance reviews on its [website](#), under the subheading "Surveillance SMC 14.18."

F. TOTAL ANNUAL COSTS

SDOT reported the estimated total cost for its CCTV traffic cameras operation in 2025 was \$4,436,087, up from \$2,571,304 in 2024. This total includes ongoing costs for personnel and technology maintenance, as well as one-time costs to renovate the Transportation Operations Center and a portion of the cost for the new ActiveITS control system, as summarized in Exhibit 4.

Exhibit 4: Estimated costs of operating SDOT's CCTV system, 2025

Cost Description	Amount
Annual license fees	\$37,426
Annual personnel costs*	\$2,531,857
Annual maintenance costs	\$422,198
Cameras purchased	\$589,904
Transportation Operations Center renovation^	\$770,081
2025 portion of ActiveITS	\$84,621
Total	\$4,436,087

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.

^This amount is the cost of the renovation attributed to 2025. SDOT reported the total cost of the renovation was \$1,254,745.54.

SDOT also reported that there were 263 cameras replaced, added, repaired, or removed in 2025, up from 49 cameras in 2024. SDOT reported that several factors contributed to this increase, including adding cameras to monitor traffic on alternate routes amid construction on Interstate 5, improving coverage ahead of the 2026 FIFA World Cup, and replacing older cameras to improve compatibility with the new system used to control cameras, ActiveITS.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objective

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 traffic camera technology in 2025. 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; and
- 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 2025 and covered the Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) traffic cameras.

Methodology

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

- 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 the City about CCTV technology

- Analyzed a list of recordings created by SDOT
- Interviewed department officials from SDOT and the Seattle Police Department
- 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

Department Response



Seattle
Department of
Transportation

September 21, 2026

Andrew Scoggin, Assistant City Auditor
Sarah Bland, Assistant City Auditor
Arushi Thakorlal, Acting City Auditor
Seattle Office of City Auditor
700 5th Avenue, Suite 2410
Seattle, WA 98104

Dear Acting City Auditor Thakorlal,

Thank you for the opportunity to review and respond to the 2025 Annual Surveillance Technology Usage Review for the Seattle Department of Transportation (SDOT).

SDOT utilizes traffic cameras for the purpose of operating a safe and reliable transportation system. SDOT uses the cameras for authorized transportation purposes such as traffic monitoring and management, responding to collisions and transportation incidents, and providing timely information to travelers.

SDOT concurs with Recommendation 1 and agrees that documenting policies and procedures for coordination with the Seattle Police Department's (SPD) Real-Time Crime Center will strengthen consistency, transparency, and accountability.

SDOT is developing an interdepartmental policy with SPD to clarify roles and responsibilities, procedures for sharing camera feeds, and expectations for operational coordination. The policy will address requests concerning camera positioning, review and approval of new camera feeds, and consideration of departmental feedback when selecting new camera locations. SDOT's detailed response and implementation plan are included in Appendix B.

We appreciate the Auditor's work and look forward to completing these improvements.

Thank you again,

Sincerely,

A handwritten signature in black ink, appearing to read "Angela Brady".

Angela Brady, PE
Acting Director, Seattle Department of Transportation

APPENDIX B

List of Recommendations and Department Response

Recommendation 1

The Seattle Department of Transportation (SDOT) should document its internal policies and procedures for coordinating with the Real-Time Crime Center. This should include the following:

- a. Procedures for responding to requests from the Real-Time Crime Center to move or zoom cameras, including defining when and where they can be moved;**
- b. SDOT's policy for sharing new camera feeds with the Real-Time Crime Center; and**
- c. Updated criteria for selecting new camera locations, including whether and how to incorporate feedback from the Seattle Police Department, and ensuring criteria on selecting camera locations incorporate principles of the City's Race and Social Justice ordinance.**

Seattle Department of Transportation Concurrence: Concur

Estimated Date of Completion (Qtr./Yr.): Q1 2027

Seattle Department of Transportation Response: SDOT concurs with the finding and Recommendation 1. SDOT is developing an interdepartmental policy and operating protocol with SPD to document roles and responsibilities for coordination with the Real-Time Crime Center. This work will establish procedures for requests to reposition cameras consistent with SDOT's practice of retaining operational control of its traffic cameras. It will also define a review and approval process for sharing new camera feeds and update camera-location criteria to incorporate Race and Social Justice principles, including how feedback from SPD or other departments is considered and documented.

APPENDIX C

Recommendations from our 2024 Annual Surveillance Technology Usage Review of SDOT CCTV Traffic Cameras (Status as of May 2026 Recommendation Follow-up Report)

Recommendation 1 – *Pending*

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 – *Implemented*

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 – *Implemented*

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 – *Pending*

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 – *Pending*

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 – Pending

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 – Pending

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 – Pending

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 D

CCTV Traffic Study Pilots Using Artificial Intelligence Reported by SDOT, Active in 2025

Vendor/ Project Name	Funding Source	Location Details	Data Sharing Agreement?	Pilot Status / Description
Derq MLK SMART Grant: Data collection and broadcasting	Federal Grant Funds (U.S. Department of Transportatio n MLK SMART Grant through Sound Transit)	Six intersections on Martin Luther King Jr Way S.: S Columbian Way S Alaska St. S Edmunds St. S Hudson St. S Myrtle St. S Othello St.	YES	Ongoing pilot since 2023, finished adding cameras in Q2 2025. All six Derq systems at these intersections provide analytics. At S Alaska St. and S Othello St., these systems also provide detection for safety messaging testing from a roadside unit.
Derq Freight Lanes: Data collection	SDOT Operational Funds	Westlake Ave. N & Highland Drive	YES	New: Started in Q4 2025. Ongoing pilot. SDOT is testing a freight- and bus-only lane on Westlake Ave N. To better understand how people use the roadway, a Derq system with dedicated cameras was installed at Westlake Ave. N & Highland Drive. Data from the system at the Fremont Bridge may also be used for this project.

Vendor/ Project Name	Funding Source	Location Details	Data Sharing Agreement?	Pilot Status / Description
Derq Downtown Traffic Volumes: Data collection	FIFA Local Organizing Committee	5th Ave. & Madison St. Alaskan Way & Madison St. 2nd Ave. & Madison St. 4th Ave. & Madison St. 1st Ave. & Madison St. Dexter Ave. N & Mercer St. Elliot Ave. W & W Mercer Place Westlake Ave. N & Mercer St. E Marginal Way S & S Hanford St. 1st Ave. S & S Holgate St. 4th Ave. S & S Holgate St. Airport Way S & S Holgate St. Fairview Ave. N & Mercer St.	YES	New: Started in Q4 2025. Ongoing. SDOT has been continuously monitoring traffic volumes at these locations since 2019. SDOT reported that the previous data collection equipment was at end of life and needed replacement. SDOT is replacing the equipment with dedicated cameras that will send video feeds to an existing Derq server in the Seattle Municipal Tower to provide data analytics.
Derq	Federal Grant Funds (Federal Highway Administratio n / UW Multimodal Integrated Corridor Mobility for All (MICMA) Grant)	15th Ave. NE & NE 43rd St.	YES	Started in 2022. Grant ended in 2025. Decision pending to maintain the Derq system and cameras with operational funds or to end the program. Two dedicated cameras directly feed to one Derq device. Collects anonymous statistics on traffic volumes, vehicle class, and pedestrian counts; records 15-second clips of incidents.
Currux Vision	SDOT Operational Funds	Three Currux servers, each can run four camera feeds.	NO	Started in 2022. Ongoing pilot. Piloted on busy arterials to count and classify vehicle traffic. SDOT reported the Currux units resulted in higher vehicle count accuracy and reduced exposure of staff to the dangers of busy arterials (when compared to teams manually laying pneumatic tubes across roadways).

Source: Seattle Department of Transportation

APPENDIX E

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.

Seattle Office of City Auditor
700 Fifth Avenue, Suite 2410
Seattle WA 98124-4729
Ph: 206-233-3801
www.seattle.gov/city-auditor

