
Flock camera meeting August 20

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To SSD Admin <ssdadmin@sunriversdor.gov>

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Sunriver Owners Association Board of Directors

Sunriver Service District

Deschutes County Board of Commissioners

Re: Opposition to Flock Safety Automated License Plate Readers – Written Testimony for Public Hearing

Dear Board Members and Officials,

I submit this letter for the public hearing on Flock Safety cameras. As a disabled veteran with PTSD, I oppose these cameras. Continuous automated tracking of vehicle movements is an extreme invasion of privacy.

Governance facts

Sunriver is not an incorporated town or city. It is an unincorporated planned community in Deschutes County. Day-to-day governance of roads, amenities, and many community rules is handled by the Sunriver Owners Association (SROA), a private homeowners association. Police and fire services are provided by the Sunriver Service District. Residents of the adjacent Three Rivers community are not voting members of SROA and have no formal voice in its decisions. The cameras record vehicles traveling through and around the area, affecting Three Rivers residents equally. Decisions that impose mass surveillance on people outside the HOA should not be made solely by SROA.

Camera and usage facts

The Sunriver Police Department operates four Flock Safety automated license plate readers installed in 2024. According to the department's public Flock transparency portal (updated August 2026), the system recorded **85,774 unique plate reads** in the most recent 30-day period and conducted only **20 searches** in that same period.

What is the purpose of logging nearly 86,000 license plates when only 20 searches occurred? This volume of continuous collection far exceeds the documented investigative use.

Sunriver Police activity data

According to the Sunriver Police Department's 2025 year-end activity report:

- 7,124 total calls for service
- 322 criminal cases initiated (408 offenses)
- 83 persons arrested

Independent crime data for Sunriver consistently shows low rates of violent and property crime relative to national averages, with only a handful of violent offenses in recent years.

Statewide rules and legal remedies

Oregon Senate Bill 1516 (effective March 2026) limits retention of ALPR data to 30 days unless tied to an ongoing criminal investigation or court proceeding. It requires agencies to log the purpose of each search and the specific type of crime or violation being investigated, and prohibits use that violates Oregon's sanctuary laws.

Under Section 9 of SB 1516, if an ALPR vendor intentionally or with gross negligence accesses, discloses, sells, shares, or otherwise uses captured license plate data related to an individual in violation of the law, that individual may bring a civil action against the vendor for economic and noneconomic damages and equitable relief. The court may also award reasonable attorney fees. Any person may bring a civil action to enjoin such a violation.

The risk of improper access, disclosure, or data breach is real. If my personal information captured by these cameras is leaked, accessed, shared, or misused in any way that violates SB 1516, I will immediately pursue all available legal remedies, including a civil action for damages and attorney fees. I am certain other residents in the Three Rivers and Sunriver area will do the same.

Deschutes County Sheriff's Office position

In June 2026 the Deschutes County Board of Commissioners approved a \$2.4 million Axon contract for body-worn and in-vehicle cameras. Interim Sheriff Ty Rupert stated on the record that the Sheriff's Office would not enable automated license plate reader capability, citing public privacy concerns.

Vendor-reported statistics

Flock Safety's own published data states its technology is involved in approximately 10% of reported U.S. crimes solved and contributes to about 20% of cleared cases in agencies that use the system. These figures are vendor-reported and drawn largely from higher-crime jurisdictions.

Given Sunriver's actual crime and case volume (322 criminal cases and 83 arrests in all of 2025) compared with 85,774 unique plates logged in a single recent 30-day period and only 20 searches, the scale of surveillance is not justified by the scale of criminal activity.

Three Rivers residents are affected equally by this system yet have no vote in SROA decisions. Installing and continuing these cameras without giving the broader affected community a meaningful say is an overstep of boundaries and an invasion of privacy that implicates our constitutional rights.

I request that the Flock cameras be removed.

Thank you for accepting this written testimony.

Sincerely,

Stefan Stevenot

Disabled Veteran

Resident of the Three Rivers area

Sent from my iPhone