



DRAFT
May 8, 2026
ALPR Interim Guidance

DISCLAIMER: Nothing in this document should be considered legal advice. Seek legal advice from your legal advisor.

About this Document

This document was developed by the WASPC Technology Committee in response to the enactment of SB 6002. This document is intended to be a resource for agencies until July 1, 2027 when the AGO Model Policy is released.

This document follows the initial guidance sent by WASPC to its members in an April 8, 2026 Get The Word Out titled “SB 6002 (ALPR).”

Introduction

SB 6002 is a complex piece of legislation that raises a significant number of practical questions, with significant legal implications, including criminal and civil liability for law enforcement officers and agencies as well as admissibility (including fruit of the poisonous tree) issues.

With such uncertainty, WASPC believes that it is not irrational for an agency to decide to eliminate all ALPR usage. Similarly, given that ALPRs are such a powerful public safety tool, it is not irrational for an agency to decide to use/continue to use ALPRs. It is important to note that SB 6002 impacts non-ALPR agencies as well.

Given the risks created by SB 6002, it is WASPC’s opinion that Washington law enforcement agencies operating ALPRs interpret provisions of SB 6002 as uniformly as practicable.

While the provisions of SB 6002 are law as of the time of this guidance, SB 6002 has not yet been assigned a Chapter or Sections in Title 10 of the RCW. Therefore, this guidance references the enacted but not yet codified law simply as SB 6002.

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1. WHEN DID SB 6002 TAKE EFFECT?

March 30, 2026

2. WHEN WILL THE ATTORNEY GENERAL'S OFFICE BEGIN WORKING ON THE MODEL POLICY?

The Attorney General's Office informed WASPC that it intends to begin work on the Model Policy in late April/early May and will reach out to WASPC as a stakeholder in that process.

3. WHEN DOES THE ATTORNEY GENERAL EXPECT TO PUBLISH THE MODEL POLICY?

The Attorney General's Office informed WASPC that it intends to publish the Model Policy on July 1, 2027.

4. WHEN MUST AGENCIES REGISTER THEIR ALPR WITH THE ATTORNEY GENERAL'S OFFICE?

Executive Summary: WASPC recommends that every agency, as that term is defined in SB 6002, send a letter to the Attorney General's Office on or about Monday, June 1, 2026, formally notifying the Attorney General that the agency uses or intends to use ALPRs. WASPC recommends that every agency submit such notification to the Attorney General's Office whether the agency currently uses or intends to use ALPRs or not. WASPC has provided a template for agency letters to the Attorney General for this purpose.

SB 6002 states "Any agency that intends to use, or currently uses an automated license plate reader system as of the effective date of this section and intends to continue using the system, shall register it with the office of the attorney general on forms approved by the office for that purpose within 180 days of the effective date of this section." (Sec 3 (5))

WASPC asked the Attorney General's Office the following question regarding what requirement is linked to the 180 days:

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Our folks see a few different ways of interpreting this sentence (or some combination thereof):

- Agencies that use or intend to use ALPRs can only register with forms that are approved by the AGO within 180 days of March 30, 2026, and any form approved by the AGO after 180 days from March 30, 2026 cannot be used; or*
- Agencies that use or intend to use ALPRs who do not register with the AGO within 180 days of March 20, 2026 are forever prohibited from using ALPRs; or*
- Agencies that use or intend to use ALPRs must register on forms that are approved by the AGO and the AGO has 180 days from March 20, 2026 to develop and approve said forms; or*
- Agencies that use or intend to use ALPRs must register on forms that are approved by the AGO and agencies must register within 180 days of March 30, 2026, or within 180 days of using ALPRs, whichever occurs later, and the AGO has no deadline on when the forms need to be published.*

Do you all have any interpretation on this sentence that you might be able to share with us? Our folks want to make sure they know how this sentence is being interpreted so they can be in compliance with the law.

Building on the prior question, when does the AGO expect to have the forms approved for agencies to be registering their ALPR systems?

The Attorney General's Office responded saying "At this point, we are not able to offer anything."

WASPC recommends that agencies interpret this provision of SB 6002 in the most risk averse light, given that this provision could be interpreted to mean that any agency that does not register their use or intent to use ALPRs with the Attorney General by Friday, September 25, 2026 (180 days after March 30, 2026), that agency is forever prohibited from using ALPRs.

WASPC recommends that every agency, as that term is defined in SB 6002, send a letter to the Attorney General's Office on or about Monday, June 1, 2026,

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formally notifying the Attorney General that the agency uses or intends to use ALPRs. WASPC recommends that every agency submit such notification to the Attorney General’s Office whether the agency currently uses or intends to use ALPRs in the near future or not.

NOTE: It is uncertain whether SB 6002 requires the Attorney General to publish such forms within 180 days of SB 6002 becoming law, and the Attorney General’s Office has both declined to clarify this question and declined to specify when such forms may be published. Out of an abundance of caution, WASPC advises these proactive letters by every Washington law enforcement agency, far in advance of the September 25, 2026 deadline.

If/when the Attorney General publishes such forms, WASPC recommends that agencies review and submit the form accordingly.

5. HOW SHOULD AGENCIES PROACTIVELY NOTIFY THE ATTORNEY GENERAL’S OFFICE OF ALPR USE/INTENDED USE?

WASPC recommends agencies template for agency letters to the Attorney General for this purpose:

[INSERT AGENCY LETTERHEAD]	
[INSERT DATE]	
Attorney General of Washington Office of the Attorney General 1125 Washington Street SE Olympia, WA 98504-0100	
SENT VIA EMAIL TO:	Enoka Herat Policy Director enoka.herat@atg.wa.gov Kelly Richburg Senior Policy and Special Projects Manager kelly.richburg@atg.wa.gov Adam Eitmann

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Legislative Director
adam.eitmann@atg.wa.gov

Alice Palosaari
Deputy Legislative Director
alice.palosaari@atg.wa.gov

RE: Notice of Intent to Register Automated License Plate Reader System(s) and Certification of Compliance – ESSB 6002, Chapter 239, Laws of 2026

Dear Attorney General Brown:

[Agency Name] (the “Agency”) submits this letter as formal notice of its intent to register its Automated License Plate Reader (ALPR) system(s) with your office pursuant to Section 3(5) of Engrossed Substitute Senate Bill 6002 (ESSB 6002), Chapter 239, Laws of 2026, effective [Effective Date]. This letter also serves as the Agency head certification required under that section, pending submission of completed registration forms on forms approved by your office.

1. Agency Information

Agency Name:	[Full legal name of agency]
Agency Type:	[Sheriff’s Office / Police Department / County / City / Port / Other]
Jurisdiction:	[County / City / Region]
Agency Head:	[Name, Title]
ALPR Program Contact:	[Name, Title, Phone, Email]
Mailing Address:	[Address, City, State, ZIP]
Date of This Notice:	[DATE]

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2. ALPR System(s) Subject to Registration

The Agency currently operates, or intends to operate, the following ALPR system(s):

#	System / Vendor Name	System Type (Fixed / Mobile / Portable)	Number of Units	Location(s) Deployed	Date of Deployment / Planned Date
1					
2					
3					

[Add rows as needed. Attach a separate inventory sheet if the Agency operates more than five systems.]

3. Certification of Compliance

Pursuant to Section 3(5)(a) of ESSB 6002, I, [Agency Head Name], [Title] of [Agency Name], hereby certify as follows:

- (a) **Statutory Compliance:** The ALPR system(s) identified in Section 2 of this letter meet all requirements of ESSB 6002, Chapter 239, Laws of 2026, including authorized use limitations, data retention requirements, prohibited practices, recordkeeping, and audit requirements.
- (b) **Adopted Policy:** The Agency has adopted a written policy governing the use of ALPR systems that is consistent with the requirements of ESSB 6002. A copy of the Agency's ALPR policy is attached to this letter as Exhibit A.
- Training Program:** The Agency has established a documented training process for all officers and personnel who will access, operate, or use the Agency's ALPR system(s).

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Training records are maintained by the Agency and available for inspection upon request.

(d) Public Website Publication: The Agency's ALPR policy has been, or will be, published on the Agency's public website at [URL] prior to or coincident with ALPR system operation.

Public Awareness: Prior to or coincident with implementation, the Agency has taken, or will take, measures to promote public awareness of its ALPR system use, consistent with Section 8(2)(b) of ESSB 6002.

4. Requested Action

The Agency respectfully requests the following from your office:

1. Acknowledgment of this letter as timely notice of intent to register under Section 3(5) of ESSB 6002
2. Transmittal of the approved ALPR registration form(s) referenced in Section 3(5)(a) of ESSB 6002
3. Notification of any stakeholder comment periods, working groups, or other input opportunities associated with development of the model ALPR policies

The Agency is committed to full compliance with ESSB 6002 and to working constructively with your office in its implementation. We welcome the opportunity to discuss any of the issues raised in this letter.

Please direct all correspondence related to this matter to:

[ALPR Program Contact Name]

[Title]

[Agency Name]

[Address]

[Phone] | [Email]

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Respectfully submitted,

[Agency Head Name]

Date

[Title]

[Agency Name]

Attachments:

Exhibit A — [Agency Name] Automated License Plate Reader System Policy

Exhibit B — ALPR System Inventory (if additional systems beyond those listed in Section 2)

Exhibit C — Training Program Summary / Curriculum Outline

6. WHAT ARE FACILITIES THAT PROVIDE PROTECTED HEALTH CARE, AS DESCRIBED IN CHAPTER 7.115 RCW, OR AT FACILITIES CONDUCTING AN IMMIGRATION MATTER AS DEFINED IN RCW 19.154.020, ELEMENTARY AND SECONDARY SCHOOLS, PLACES OF WORSHIP, COURTS, OR FOOD BANKS

Executive Summary: SB 6002 defines “facilities that provide protected health care” and “facilities conducting an immigration matter.” WASPC recommends that “elementary and secondary school” be defined consistent with the premises upon which dangerous weapons are prohibited pursuant to RCW 9.41.280; “places of worship” for purposes of SB 6002 according to its commonly used and understood meaning: a location primarily used for persons to regularly assemble for religious worship and which is maintained or controlled by a religious organization; “courts” be defined as that term is defined in RCW 2.28.300; and “food banks” for purposes of SB 6002 as the term “distributing organization” is defined in RCW 69.80.020

SB 6002 does provide definitions for some of these terms used:

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- “facilities that provide protected health care as described in chapter 7.115 RCW”
 - RCW 7.115.010 (4): ““Protected health care services” means gender-affirming treatment and reproductive health care services that are lawful in the state of Washington.”
 - RCW 7.115.010 (3): ““Gender-affirming treatment” means health services or products that support and affirm an individual's gender identity, including social, psychological, behavioral, and medical or surgical interventions. Gender-affirming care services include, but are not limited to, evaluation and treatments for gender dysphoria, gender-affirming hormone therapy, and gender-affirming surgical procedures.”
 - RCW 7.115.010 (5): ““Reproductive health care services” means all services, care, or products of a medical, surgical, psychiatric, therapeutic, mental health, behavioral health, diagnostic, preventative, rehabilitative, supportive, counseling, referral, prescribing, or dispensing nature relating to the human reproductive system including, but not limited to, all services, care, and products relating to pregnancy, assisted reproduction, contraception, miscarriage management, or the termination of a pregnancy, including self-managed terminations.”
- “facilities conducting an immigration matter as defined in RCW 19.154.020”
 - RCW 19.154.020 (2): ““Immigration matter” means any proceeding, filing, or action affecting the nonimmigrant, immigrant, or citizenship status of any person arising under immigration and naturalization law, executive order, or presidential proclamation, or pursuant to any action of the United States citizenship and immigration services, the United States department of labor, the United States department of state, the United States department of justice, the United States department of homeland security, the board of immigration appeals, or any other entity or agency having jurisdiction over immigration law.”
 - *NOTE: The definition of “immigration matter” here is separate and distinct from the definition of “practice of law” provided in RCW 19.154.020 (3). It should be assumed, therefore, that the Legislature*

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intended to exclude attorneys' offices from this sensitive locations
prohibition.*

SB 6002 does not define the terms “elementary and secondary schools, places of worship, courts, or food banks.”

According to the Ordinary Meaning Canon (also referred to as the Plain Meaning Rule), words are interpreted based on their everyday usage at the time of enactment unless a technical, legal definition is required or a different intention is evident.

While the RCW does not appear to define “elementary school,” “secondary school,” or “elementary and secondary school,” the term “elementary or secondary school” is used in RCW 9.41.280 (Possessing dangerous weapons on school facilities).

WASPC recommends that agencies interpret the term “elementary or secondary school” for purposes of SB 6002 consistent with the premises upon which dangerous weapons are prohibited pursuant to RCW 9.41.280.

The RCW does not appear to define “place of worship.”

WASPC recommends that agencies interpret “places of worship” for purposes of SB 6002 according to its commonly used and understood meaning: a location primarily used for persons to regularly assemble for religious worship and which is maintained or controlled by a religious organization.

The term “court facility” is defined in RCW 2.28.300 (Courts Open to All Act) as “any building or space occupied or used by a court of this state, and adjacent property, including but not limited to adjacent sidewalks, all parking areas, grassy areas, plazas, court-related offices, commercial and government spaces within court building property, and entrances and exits from said building or space.

WASPC recommends that agencies define “courts” for purposes of SB 6002 as that term is defined in RCW 2.28.300.

The RCW does not appear to define “food bank.” Chapter 69.80 (Food Donation and Distribution – Liability) does provide a definition of “distributing organization” in RCW 69.80.020 as “a charitable nonprofit organization under section 501(c) of the federal internal revenue code which distributes food free of charge and includes any nonprofit organization that distributes food free of charge to other nonprofit organizations or to the public.”

WASPC recommends that agencies define “food banks” for purposes of SB 6002 as the term “distributing organization” is defined in RCW 69.80.020.

7. HOW TO IDENTIFY FACILITIES THAT PROVIDE PROTECTED HEALTH CARE, AS DESCRIBED IN CHAPTER 7.115 RCW, OR AT FACILITIES CONDUCTING AN IMMIGRATION MATTER AS DEFINED IN RCW 19.154.020, ELEMENTARY AND SECONDARY SCHOOLS, PLACES OF WORSHIP, COURTS, OR FOOD BANKS.

Executive Summary: For fixed ALPR cameras, WASPC recommends that agencies conduct site specific due diligence to ensure that data collection does not occur too close to a sensitive place. For mobile/vehicle mounted ALPRs, the issue becomes significantly more complicated.

Identifying facilities that provide protected health care, as described in chapter 7.115 RCW, or at facilities conducting an immigration matter as defined in RCW 19.154.020, elementary and secondary schools, places of worship, courts, or food banks (collectively referred to as “sensitive locations”) will prove to be a very difficult, if not impossible task. As written, there is no duty for a sensitive location to make itself be known as such and the duty to identify sensitive locations and prevent any unauthorized collection of ALPR data is entirely on the agency.

Further, SB 6002 does not clarify whether a facility qualifies as a sensitive location only while open and providing services, or whether temporary use as a sensitive location qualifies that location as a sensitive location on an ongoing or permanent basis. For example, if a business, private residence, community hall, theater, or other facility is used once a week as a place of worship or occasionally hosts an immigration workshop, it is unclear whether that location is only a sensitive location while such activities are occurring, or whether that location becomes a sensitive location on an ongoing/permanent basis.

The sensitive locations provisions in SB 6002 may be the reason why mobile/vehicle mounted ALPRs are determined to be entirely unworkable in Washington state.

For fixed ALPR cameras, WASPC recommends that agencies conduct site specific due diligence to ensure that data collection does not occur too close to a sensitive place. WASPC recommends that this due diligence be performed

and documented for each fixed ALPR camera.

For mobile/vehicle mounted ALPRs, WASPC's best advice is that agencies ensure that ALPR vendors geofence the data capturing only the public rights of way and not any portion of private or public property that is not the public right of way. However, as discussed in #6 below, there is at least one predictable circumstance where a vehicle on the public right of way could be considered to be close enough to a sensitive place to make ALPR data collection prohibited.

NOTE: ALPR camera images capture images both within the camera's ability to convert the image to computer readable data, as well as images beyond the camera's ability to convert the image into computer readable data. SB 6002 does not govern what an ALPR camera can see, it only governs what an ALPR camera can convert into computer readable data.

8. HOW SHOULD THE TERMS LIKE "IMMEDIATE" "SURROUNDING" "ADJACENT" "PRIMARILY" "EXCLUSIVELY" AND "PREMISES" BE DEFINED?

Executive Summary: WASPC recommends that agencies apply the ordinary meaning of these words. However, "premises" and "facilities" should not be interpreted synonymously. Practically speaking, WASPC recommends that agencies interpret this provision to mean that we cannot place or operate ALPRs in an area that is either on the premises of any building or its attached parking lot, or in an area that records ingress/egress from that building, or in the areas that are directly around that building, if that building is used to provide gender affirming treatment, reproductive health care services, any action or proceeding concerning immigration, or is an elementary or secondary school, a place of worship, a court, or a foodbank.

WASPC asked the Attorney General's Office the following question regarding how to define these terms:

Section 3 (4)(a) says "It is unlawful for any agency to collect automated license plate reader data on the premises or immediate surroundings or access to or from facilities that provide..." Further, Section 3 (4)(b) says "For the purposes of this subsection, "facilities" includes only the building or buildings used for the purposes described in (a) of this subsection and any

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immediately adjacent parking lots that are primarily or exclusively used for the purposes described in (a) of this subsection."

Given that the terms "immediate" "surrounding" "adjacent" "primarily" and "exclusively" are not defined in the bill, we are interpreting those terms to have their plain meaning.

The phrase "immediate surroundings" does seem to get a bit tricky, and we're interpreting it, in this context to mean that we cannot place or operate ALPRs in an area that is either on the premises of any building or its attached parking lot, or in an area that records ingress/egress from that building, or in the areas that are directly around that building, if that building is used to provide gender affirming treatment, reproductive health care services, any action or proceeding concerning immigration, or is an elementary or secondary school, a place of worship, a court, or a foodbank.

Does the AGO agree, at least until an AGO Model Policy is published, that this is a reasonable way to interpret these words and this phrase?

Building on the prior question, Section 3 (4) uses the term "premises" and "facilities" but only defines the term "facilities."

Does that AGO agree, at least until an AGO Model Policy is published, that it is reasonable to interpret "premises" to be synonymous with "facilities" or does the AGO think that the two terms have different meanings in this context? If the AGO thinks that these two terms have different meanings in this context, how would the AGO define the meaning of "premises" in this context?

The Attorney General's Office responded saying "At this point, we are not able to offer anything."

WASPC recommends that agencies apply the plain meaning of the words "immediate" "surrounding" "adjacent" "primarily" and "exclusively." Out of an abundance of caution, WASPC recommends that agencies NOT interpret "premises" synonymous with "facilities." While "premises" and "facilities" are generally synonymous in normal discourse, it appears that there is some

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precedential distinction in a legal context – “facilities” being the more specific term to describe functional structures, equipment or machinery, and “premises” being the broader term to describe both facilities and the real property/land upon which the facilities are located.

Practically speaking, WASPC recommends that agencies interpret this provision to mean that we cannot place or operate ALPRs in an area that is either on the premises of any building or its attached parking lot, or in an area that records ingress/egress from that building, or in the areas that are directly around that building, if that building is used to provide gender affirming treatment, reproductive health care services, any action or proceeding concerning immigration, or is an elementary or secondary school, a place of worship, a court, or a foodbank.

WASPC does not interpret the statute to prohibit the collection of ALPR data on public roadways or rights of way. PLEASE NOTE, however, that it is possible that a court could interpret that a vehicle on the public right of way turning into a sensitive place could be included in the prohibition on collecting ALPR data “on the premises or immediate surroundings or access to or from” a sensitive place. WASPC strongly advises that agencies be aware of this possibility and take steps to ensure that the due diligence for fixed ALPRs considers this circumstance, and that agencies at least require some kind of human review of ALPR data in criminal investigations prior to submitting the case for prosecution. It is important to remember that an ALPR photo, by itself, will likely not provide sufficient context to determine whether a sensitive place is nearby, thus such a review prior to submission of a case for prosecution should consider both the ALPR photo and the location of the vehicle when the ALPR photo was captured.

9. WHAT PERIOD OF TIME DO THE ANNUAL REPORTS ON ALPR PRACTICES AND USAGE COVER?

Executive Summary: WASPC recommends annual report dates as follows:			
	Data Beginning	Data Ending	Report Submitted
First Report	11/1/26	10/31/27	12/1/27

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Second Report	11/1/27	10/31/28	12/1/28	
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Section 7 (2) requires agencies that use ALPRs to, by December 1, 2027, submit an annual report on its ALPR practices and usage. However, SB 6002 does not specify a beginning or ending date for the data to be included in the annual report.

WASPC recommends that agencies submit annual reports that begin November 1 and end October 31. This provides 30 days for the agency to prepare and review the report, check for and remedy any errors and omissions, and submit the report. Accordingly, the first annual report, due December 1, 2027, would cover ALPR practices and usage from November 1, 2026 through October 31, 2027. The second annual report, due December 1, 2028, would cover ALPR practices and usage from November 1, 2027 through October 31, 2028.

10. HOW ARE OFFENSE TYPES CATEGORIZED AND ARTICULATED IN THE ALPR SOFTWARE?

Executive Summary: WASPC recommends that agencies require the specific criminal offense – by RCW title, chapter, and section, and offense name (ex. “RCW 9A.52.025 – residential burglary”– when officers document the offense type for their ALPR use.

Section 3 (2)(a)(ii) of SB 6002 requires license plate numbers or vehicle characteristics entered into a state or local automated license plate reader system database or entered in order to perform a search to be, upon an officer’s determination that the license plate number or vehicle characteristics are relevant and materials to an investigation of a vehicle that is associated with a missing or endangered person or related to or involved in a felony or gross misdemeanor. Further, Section 8 requires ALPR audit trail data to include the “specific purpose for accessing or querying the automated license plate reader system, including the offense type for any criminal investigation” (Sec 8 (1)(a)(iv).

SB 6002 does not specify how agencies or officers are to specify the offense type. Agencies could broadly characterize offense type:

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- as described in SB 6002 (felony or gross misdemeanor);
- broadly by offense description (ex. “homicide,” “assault,” or “DUI”);
- according to the offense as codified by chapter in the RCW (ex. “Chapter 9A.36 RCW – Assault-physical harm” or “Chapter 46.61 RCW – Rules of the Road”);
- by specific RCW citation of the criminal offense being investigated (ex. “RCW 7.105.450 – Violation of a Protection Order” or “RCW 9A.46.110 – Stalking”);
- by NIBRS offense code (ex. “510 – Bribery” or “11A – Forcible Rape”); or
- some other means.

WASPC recommends that agencies adopt a uniform means by which the offense type can be recorded. While WASPC recognizes that broad categories of offenses such as “felony/gross misdemeanor/missing or endangered person” provides simplicity for officers entering the data, WASPC also recognizes that the absence of specific information creates an opportunity for assumptions to be made. We must recognize that opportunities for assumptions are opportunities for bad actors to create their own narrative.

For these reasons, WASPC recommends that agencies require the specific criminal offense – by RCW title, chapter, and section, and offense name (ex. “RCW 9A.52.025 – residential burglary” – when officers document the offense type for their ALPR use. This requires additional due diligence by officers to document, but WASPC believes this due diligence is necessary to ensure that ALPRs remain an available public safety tool in Washington State. WASPC further believes that – in the vast majority of instances where an ALPR would be queried, officers will have at least one specific offense to which the officer is investigating.

It is also important to note that while SB 6002 does not require ALPR annual reports to include the offense(s) of conviction that resulted in cases where an ALPR was used, it does require “the number of matches that resulted in traffic stops or arrests made with assistance from automated license plate reader systems, and the number of subsequent prosecutions” (Section 7 (2)(ii)(A)). It is unclear whether the Legislature recognizes that ALPRs can be used to clear a suspect as it can be used to identify and apprehend one, and it is equally

unclear whether the Legislature understands that law enforcement agencies may clear and release a suspect after arrest, may resolve a traffic stop by means other than a citation or arrest, and has no control over whether a case is prosecuted.

11. CAN A WASHINGTON LAW ENFORCEMENT AGENCY THAT USES ALPRS SHARE ALPR DATA WITH ANOTHER ENTITY THAT IS NOT A WASHINGTON LAW ENFORCEMENT AGENCY?

Executive Summary: WASPC interprets SB 6002 to allow an agency authorized to use ALPRs under SB 6002 to allow direct access to any Washington law enforcement agency also authorized to use ALPRs under SB 6002. WASPC interprets SB 6002 to prohibit sharing ALPR data with any entity not authorized to use ALPRs pursuant to SB 6002, though WASPC believes agencies may share specific, actionable, and timely ALPR data with another law enforcement agency necessary to locate a specific vehicle for legitimate public safety purposes not prohibited under Washington law.

Section 4 states that automated license plate reader data collected by or on behalf of an agency, as authorized pursuant to Section 3 (2) of this act, shall not be used or shared for any other purpose.”

Section 5 (1)(a) states that an agency that uses an ALPR system shall not “disclose, share, or permit access to automated license plate reader data except as required in a judicial proceeding.”

Section 5 (1)(b) state that an agency that uses an ALPR system shall not “provide any other entity with direct access to the automated license plate reader system, except with other state or local agencies authorized to collect automated license plate reader data under Section 3 of this act.”

While it is notable that SB 6002 uses the term “access” or a derivative thereof twenty-four times and Section 5 (1)(b) contains the only instance where the Legislature uses a modified version of that term, Section 5 (1)(b) must be read together in in the context of both Section 4 and Section 5 (1)(a).

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Given how broadly SB 6002 defines “automated license plate reader data” in section 2 (3), the Section 4, Section 5 (1)(a), and Section 5 (1)(b) provisions beg the question whether or not agencies authorized to use ALPRs could, for example, share the license plate and/or description of a suspect vehicle with agencies not authorized to use ALPRs pursuant to SB 6002 – whether those agencies are Washington law enforcement agencies or not.

According to the Absurdity Doctrine, courts may depart from the literal, plain language of a statute to avoid an irrational, unjust, or absurd outcome that the Legislature likely never intended.

WASPC interprets SB 6002 to allow an agency authorized to use ALPRs under SB 6002 to allow direct access to any Washington law enforcement agency also authorized to use ALPRs under SB 6002. Such direct access must still satisfy the retention and authorized uses delineated in Section 4.

WASPC does not interpret SB 6002 to allow ALPR data to be shared with entities not authorized to use ALPRs pursuant to SB 6002 by a means other than “direct access.” Put another way, WASPC interprets SB 6002 to prohibit sharing ALPR data with any entity not authorized to use ALPRs pursuant to SB 6002. WASPC reminds agencies of the Absurdity Doctrine and cautions agencies from interpreting this prohibition to the point of absurdity. The literal, plain language of Section 5 (1)(a) taken together with the definition of ALPR data and applied in all circumstances leads to an irrational, unjust, and absurd result that the Legislature could not have intended. To the best of WASPC’s ability, the only rational means by which the language in Section 5 (1)(a) could be applied is as follows:

- **Agencies may not allow access to an ALPR system by any entity not authorized to use ALPRs pursuant to SB 6002;**
- **Agencies may not share comprehensive or time series/time lapse data with any entity not authorized to use ALPRs pursuant to SB 6002;**
- **Agencies may not share ALPR data for intelligence or investigatory purposes with any entity not authorized to use ALPRs pursuant to SB 6002;**

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- **Agencies may share specific, actionable, and timely ALPR data with another law enforcement agency necessary to locate a specific vehicle for legitimate public safety purposes not prohibited under Washington law. This includes sharing a license plate number and/or description, photograph, location, GPS coordinates, speed and/or direction of travel of a victim, witness, or suspect vehicle, regardless of the medium in which that information is shared – radio broadcast, verbal, electronic, or written communication.**

12. CAN A WASHINGTON LAW ENFORCEMENT AGENCY THAT USES ALPRS SHARE ALPR DATA WITH ANOTHER WASHINGTON LAW ENFORCEMENT AGENCY THAT DOES NOT USE ALPRS?

SB 6002, in this regard, only distinguishes between agencies authorized to use ALPRs and agencies not authorized to use ALPRs.

WASPC interprets this question in the same regard as the previous question.

13. SHOULD CIVILIAN STAFF BE ALLOWED TO ACCESS ALPR DATA?

Executive Summary: WASPC recommends that agencies have a specific policy requiring that an officer has made an individualized determination that a license plate or vehicle description is relevant and material to an investigation for which ALPRs are authorized, and that determination is documented. Once an officer has made such determination, the data entry or query may be performed by an officer or civilian employee, provided that the officer or employee has been properly trained and approved to use the system.

While Section 3(2)(a)(ii) requires an ‘officer’ to determine that a plate is relevant and material before it is entered into the ALPR database, the bill makes no further regulation as to which employees within an agency may access ALPR data, make data entries or query the data.

SB 6002 does not define ‘officer.’

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WASPC recommends that agencies interpret “officer” to mean a federal peace officer, a general authority Washington peace officer, a limited authority Washington peace officer, a reserve officer, and a specially commissioned peace officer, as those terms are defined in RCW 10.93.020. WASPC further recommends that agencies have a specific policy requiring that an officer has made an individualized determination that a license plate or vehicle description is relevant and material to an investigation for which ALPRs are authorized, and that determination is documented. Once an officer has made such determination, the data entry or query may be performed by an officer or civilian employee, provided that the officer or employee has been properly trained and approved to use the system.

14. SHOULD LAW ENFORCEMENT VOLUNTEERS BE ALLOWED TO ACCESS ALPR DATA?

No. SB 5974 – also enacted during the 2026 legislative session – specifically prohibits city and county law enforcement agencies from using surveillance technologies except fixed cameras within the police station or Sheriff’s Office. Further, this same bill prohibits volunteers from sharing information from law enforcement databases with any party other than the Chief/Sheriff or the designated volunteer supervisor.

15. CAN ALPR SYSTEMS PING AGAINST WACIC?

On April 21, 2026, Washington State Patrol Criminal Records Division Assistant Division Commander Wes Vradenburg sent the following message to the WSP ACCESS ANNOUNCEMENTS listserv. As of the date of this publication, this is the most recent information WASPC has on this question. WASPC advises agencies seeking clarification or updated information to contact Assistant Division Commander Vradenburg.

From: ACCESS Announcements <ACCESS-ANNOUNCEMENTS@LISTSERV.WSP.WA.GOV> on behalf of Vradenburg, Wesley (WSP) <Wesley.Vradenburg@WSP.WA.GOV>
Sent: Tuesday, April 21, 2026 10:54 AM

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To: ACCESS-ANNOUNCEMENTS@LISTSERV.WSP.WA.GOV <ACCESS-ANNOUNCEMENTS@LISTSERV.WSP.WA.GOV>
Subject: Automated License Plate Readers

Good morning!

The passage of SB 6002 made significant changes to RCWs for the use of Automated License Plate Readers (ALPR) in Washington State. Many agencies have existing ALPR agreements with the Washington State Patrol to receive extracts from NCIC and WACIC for use in their ALPR systems. The WACIC extract is still available via SFTP, the NCIC extract is not available at this time due to comingled data with prohibited files. We have asked the FBI to create an extract specific to those files allowed by law, unfortunately NCIC is under a change freeze as NCIC is migrated to a cloud environment. Once that is complete, we will approach the FBI again with this ask.

Agencies with ALPR agreements may continue to pick up the WACIC extract from the SFTP site, we will be reaching out with an updated MOU that reflects this new language in the near future.

Agencies who do not have ALPR agreements but would like to get one can send their request to me and I will get the contracting process started.

Wes Vradenburg
Assistant Division Commander
Criminal Records Division
ACCESS & Collision Records Section
Washington State Patrol

16. IS IT LAWFUL FOR AN AGENCY TO USE ALPR FOR VEHICLES FROM OUT OF STATE OFFENSES?

Executive Summary: WASPC recommends that, except in limited circumstances, agencies not regularly enter license plates or vehicle characteristics for out of state offenses into a state or local ALPR database (hotlist). WASPC does find it appropriate for agencies to perform searches of their ALPR systems for vehicles or vehicle characteristics for out of state offenses.

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Section 3 (2) sets forth the authorized purposes for an ALPR system. Subsection (a) of this subsection contains the primary law enforcement purposes, and makes two distinct categories: data in a state or federal database (i); and data entered into a state or local database or entered to perform a search.

“(2) An agency may access, operate, or use an automated license plate reader system and its associated data only for the following authorized purposes:

(a) Any law enforcement agency may use an automated license plate reader system for the purpose of comparing captured automated license plate reader data with:

(i) Data in any of the following databases maintained by either a federal or Washington state agency: The department of licensing, the state criminal justice information system, the federal bureau of investigation kidnappings and missing persons list, the national center for missing and exploited children list, and the Washington missing persons list; or

(ii) License plate numbers or vehicle characteristics that have been entered into a state or local automated license plate reader system database or entered in order to perform a search, upon an officer's determination that the license plate numbers or vehicle characteristics are relevant and material to an investigation of a vehicle that is:

(A) Stolen;

(B) Associated with a missing or endangered person;

(C) Registered to an individual for whom there is an outstanding felony or gross misdemeanor warrant; or

(D) Related to or involved in a felony or gross misdemeanor.”

While it is clear that the Legislature, by omission, prohibited NCIC as an allowable primary source in subsection (i), the Legislature did not make such distinction in subsection (ii). A plain reading of subsection (ii) appears to allow any felony or gross misdemeanor offense to be entered into a local or state ALPR database without regard for where the offense occurred or the source of the information.

WASPC recommends that agencies not regularly enter license plates or vehicle characteristics for out of state offenses into a state or local ALPR database

(hotlist). In certain circumstances, such as agencies in near proximity and/or regular vehicle traffic to a state or international border or where specific information leads the agency to believe that the vehicle is likely be present in their jurisdiction, it may be appropriate – on a case by case basis – to enter license plates or vehicle characteristics for out of state offenses into a state or local ALPR database. In such instances, it is important that the agency ensure the offense would otherwise qualify for entry into an ALPR database had it occurred in Washington, the information is not stale, and all other requirements are satisfied. WASPC reminds agencies that Section 5 (2) requires that “Any agency that uses a database pursuant to section 3 (2) (a) and (b)(ii) of this act shall use the most recent and updated version of the database that is available to the agency and shall check for and apply any available updates no less than once every 24 hours.”

WASPC does find it appropriate for agencies to perform searches of their ALPR systems for vehicles or vehicle characteristics for out of state offenses if the offense would otherwise qualify for entry into an ALPR database had it occurred in Washington, the information is not stale, and all other requirements are satisfied.

17. IS IT LAWFUL TO TEST ALPR SYSTEMS/DATA AND/OR TRAIN PERSONNEL ON THE PROPER USE OF AN ALPR SYSTEM WITHOUT VIOLATING THE PROVISIONS OF SB 6002?

<p>Executive Summary: Yes, though certain practices should be followed when testing and training or undergoing maintenance.</p>
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It is lawful and required to provide training for any officers who use an agency’s ALPR system. Section 3(5) requires an agency to provide the Attorney General’s Office with a documented training process as part of the registration process.

Testing and maintenance of an ALPR system are not prohibited under the provisions of the bill. Section 3 provides “[e]xcept as provided for in this section, it is unlawful for any agency to *access, operate, or use*” an ALPR system. Section 10 establishes criminal penalties for the willful and intentional “*queries, accesses, or uses*” of an ALPR system “for a purpose not specifically authorized under this chapter.” Based

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on the plain language of the bill, the maintenance and testing of an ALPR system are not addressed or regulated. Arguably, in order to maintain or test an ALPR system, an individual would have to “access” or “use” the system. However, maintenance and testing of an ALPR system are necessary in order to ensure that the system is functioning properly and maintaining compliance with the requirements set forth by the legislature. As such, the authority to conduct maintenance and/or testing on the system is implied. See, *Pac. Cnty. v. Sherwood Pac., Inc.*, 17 Wash. App. 790, 567 P.2d 642 (1977); *Tuerk v. State, Dep't of Licensing*, 123 Wash. 2d 120, 864 P.2d 1382 (1994).

18. WHAT DOES IT MEAN FOR AN AGENCY TO OBTAIN PRIVATELY HELD ALPR DATA?

Executive Summary: WASPC takes the interpretation that agencies cannot allow private entities to share their ALPR data directly into the agency’s ALPR system, nor can agencies solicit a private entity to provide ALPR data to the agency – whether on an ongoing or case-by-case basis. When an agency comes into unsolicited possession of privately held ALPR data, WASPC recommends that the agency seek a warrant (*nunc pro tunc*) prior to analyzing or otherwise acting on the data.

WASPC does not interpret Section 5(4) to require agencies to screen or vet a photograph or similar information offered as evidence to ensure that the photograph or similar information was used to convert images of license plates into computer-readable data.

SB 6002 states “An agency may obtain privately held automated license plate reader data only pursuant to a valid, court-issued, probable cause warrant.” (*Sec 5 (4)*)

SB 6002 defines “automated license plate reader data” to mean “all data collected by automated license plate reader systems, including, but not limited to global positioning system coordinates, location, date and time, speed of travel, photograph, license plate number, automobile characteristics, or other identifying information” (*Sec 2 (3)*). SB 6002 defines “automated license plate reader system” to mean “a system, software, or computer algorithm, whether used independently or in combination with one or more mobile cameras, that is used to convert images of license plates into computer-readable data” (*Sec 2 (4)*). Taken together, ALPR data is defined as all data collected by any system, software, or computer algorithm that is used to convert images of license plates into computer-readable data.

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It is important to note that the definition of ALPR system makes no distinction between an ALPR system operated by a public agency or a private entity. As defined in SB 6002, any system or software that is used to convert images of license plates into computer-readable data is an ALPR system, and any data in that system is ALPR data.

Applying these definitions to Section 5(4), the definition of “obtain” quickly becomes the pivotal question in this provision. “Obtain” is not defined in SB 6002.

WASPC asked the Attorney General’s Office the following question regarding what “obtain” means in this context:

Section 5 (4) says "An agency may obtain privately held automated license plate reader data only pursuant to a valid, court-issued, probable cause warrant."

Does the AGO have any preliminary guidance on how to interpret "obtain" in context of this language? Setting aside the clear 1st Amendment issues with this subsection, given the definition of ALPR data and ALPR system in Section 2, it appears that there could be a wide variety of implications. For example:

- a. Does this language only prohibit an agency from allowing information sharing from privately held ALPR data directly into the agency’s ALPR system?*
- b. Does this language also prohibit a person reporting a crime from voluntarily providing privately held ALPR data as evidence of the alleged crime?*
- c. Does this language also require law enforcement agencies to establish some sort of screening/vetting procedure anytime a photograph or other similar information (think Ring cameras, CCTV footage or screenshots, etc) is offered as evidence to ensure that the photograph, for example, was not previously used to generate computer-readable data?*

The Attorney General’s Office responded saying “*At this point, we are not able to offer anything.*”

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According to the Ordinary Meaning Canon (also referred to as the Plain Meaning Rule), words are interpreted based on their everyday usage at the time of enactment unless a technical, legal definition is required or a different intention is evident.

According to the Absurdity Doctrine, courts may depart from the literal, plain language of a statute to avoid an irrational, unjust, or absurd outcome that the Legislature likely never intended.

WASPC interprets the use of the term “obtain” in Section 5 (4) of SB 6002 to be a transitive verb. Merriam-Webster defines the transitory verb use of the word “obtain” as “to gain or attain usually by planned action or effort.” Applied to Section 5 (4), WASPC takes the interpretation that agencies cannot allow private entities to share their ALPR data directly into the agency’s ALPR system, nor can agencies solicit a private entity to provide ALPR data to the agency – whether on an ongoing or case-by-case basis. When an agency comes into unsolicited possession of privately held ALPR data, WASPC recommends that the agency seek a warrant (nunc pro tunc) prior to analyzing or otherwise acting on the data.

WASPC does not interpret Section 5(4) to require agencies to screen or vet a photograph or similar information offered as evidence to ensure that the photograph or similar information was used to convert images of license plates into computer-readable data. Not only is this interpretation inconsistent with the everyday usage of the word “obtain,” but such an interpretation would likely violate the Constitutional right to petition the government for redress of grievances and would lead to an absurd result.

19. HOW SHOULD AN AGENCY MAINTAIN “ALL RECORDS OF ACTIONS IN WHICH AUTOMATIC LICENSE PLATE READER DATA IS EXPORTED, DOWNLOADED, OR SHARED?”

Section 8 (1)(b) requires each agency operating or accessing an ALPR to maintain audit trail data that includes “All records of actions in which automated license plate reader data is exported, downloaded, or shared” for two years.

To the best of WASPC’s knowledge, this data is not collected by current ALPR system.

WASPC recommends that agencies collectively insist that ALPR vendors develop and implement this functionality within their respective platforms. It is neither reasonable nor practical to develop this capability on an agency by agency basis.

20. TRANSPARENCY PORTAL SUGGESTIONS

Executive Summary: WASPC recommends that agencies take more than minimal steps to promote public awareness of the use and benefits of ALPRs. WASPC recommends that agencies establish and maintain a dedicated page on the agency’s website that contains the agency’s ALPR policy and plain language explanation of the agency’s ALPR uses. This page should contain clear disclosures about what ALPRs are not used for, as well as a regularly updated list of examples of how ALPRs are used to provide for public safety in the community.

SB 6002 requires that “prior to or coincident with implementation of an automated license plate reader system, a local law enforcement agency shall take measures to promote public awareness on the use of such system” (Section 7 (2)(b)).

SB 6002 provides no additional guidance as to what “additional measures” includes.

WASPC recommends that agencies take more than minimal steps to promote public awareness of the use and benefits of ALPRs. It is incumbent upon Washington law enforcement agencies, not only as public servants, but the only primary source of information on how ALPRs are (and are not used), to provide clear and understandable information on ALPRs. WASPC recommends that agencies establish and maintain a dedicated page on the agency’s website that contains the agency’s ALPR policy and plain language explanation of the agency’s ALPR uses. This page should contain clear disclosures about what ALPRs are not used for, as well as a regularly updated list of examples of how ALPRs are used to provide for public safety in the community. The ALPR transparency portal is also an ideal place for the ALPR annual report to be “conspicuously posted on the agency’s public website” as required in Section 7 (2)(a)(ii).

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