

Case Studies

Computer Vision Cross-City Policy Analysis

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This document was developed by Aspen Policy Academy fellows while participating in the Science and Technology Policy Fellowship. The Fellows were asked to recommend updates to the New York City Office of Technology and Innovation's [Artificial Intelligence Action Plan](#). This document provides an overview of current computer vision regulations in cities comparable to New York City. The full project, including a policy brief explaining the fellows' core recommendations, is [available here](#). Please note that all authors' opinions published here are their own. This publication does not reflect the views of the Aspen Policy Academy or the Aspen Institute.

Background

This document provides a cursory overview of current computer vision regulations in cities comparable to New York City. Regulation in this area is still in its infancy and consists of a patchwork of state, city, and agency-specific policies.

As illustrated here, most regulatory activity to date has concentrated on facial recognition; consequently, the limited existing computer vision policies are largely focused on that technology. We summarize the key features of regulation frameworks from 4 cities in Table 1 and include San Francisco and Toronto as short case studies.

San Francisco

In May 2019, the San Francisco Board of Supervisors passed the [Stop Secret Surveillance Ordinance](#), the first regulation in the United States to ban the use of facial recognition technology by city and county agencies. The ordinance emerged from a sustained grassroots advocacy campaign by 26 organizations including the [ACLU of Northern California](#) and the [Electronic Frontier Foundation](#).

In March 2024, voters passed Proposition E, which made a number of changes to the way the San Francisco Police Department (SFPD) can operate, particularly with respect to surveillance technologies. Specifically, it allowed the SFPD to install public security cameras and deploy or use drones. It also reduced some of the requirements for the Police Commission to approve new surveillance technology or camera installations, and it delayed certain public disclosures until after use—in some cases up to one year.

Supporters of the proposition argued that these changes would reduce administrative burdens and enable police officers to spend more time in the community. However, critics warned that Proposition E rolled back important transparency and oversight mechanisms. The debate over Proposition E and its effects on civil liberties in San Francisco shows how deployment of computer vision technologies and efforts to regulate them must grapple with concerns about privacy, accountability, and the balance of power between law enforcement and the public.

Toronto

In 2017, the economic development agency Waterfront Toronto selected Sidewalk Labs, a subsidiary of Alphabet (Google), to redevelop a portion of the city's waterfront. The plan envisioned building a “smart city” that would integrate digital infrastructure into the urban environment, including a “digital layer” that would manage services, adaptive buildings, and sustainable transport systems. Central to the plan was the development of a proving ground for urban innovations such as the large-scale deployment of sensors and cameras to monitor traffic, pedestrian movement, and use of public space—technologies reliant on computer vision and other advanced analytics.

Toronto residents' concerns quickly coalesced around privacy, governance, and civil liberties related to the use of these technologies. In response, Sidewalk Labs proposed establishing an Urban Data Trust, an independent, government-sanctioned entity responsible for “urban data”—a new category defined to include both personal information and data collected in shared physical spaces. The Trust would review proposed data uses under a “Responsible Data Use Assessment” framework to ensure that projects had clear public benefits and protected privacy.

However, the governance structure was vague. Furthermore, the composition of the Trust's membership was never clearly defined, and it lacked a statutory foundation in Canadian law.

As a result, it would not have had meaningful enforcement authority. These gaps made the Trust a lightning rod for criticism by the public and underscored the project's lack of binding accountability for technologies such as computer vision, which can profoundly affect residents' privacy and autonomy.

Facing sustained opposition over data governance and increasing financial pressures, Sidewalk Labs ultimately canceled the project in May 2020, citing the economic uncertainty created by the COVID-19 pandemic. This case illustrates both the opportunities and the risks of embedding computer vision into urban environments, as well as the importance of establishing enforceable, transparent governance frameworks from the outset.

Table 1: City Computer Vision Frameworks

City	Framework	Notes
San Francisco	Legislative <u>facial recognition ban</u> for city agencies and predeployment review of surveillance technologies by city legislature	Facial recognition ban remains, but lacks regulation on broader computer vision technology
Portland	Full <u>facial recognition ban</u> (public and private) and city surveillance technology registry	Strongest US policy to date: prohibits use in retail stores, schools, and public buildings; enforcement in private organizations is challenging
Barcelona	<u>Independent AI ethics board and algorithmic registry</u> (not computer vision specific)	Transparent framework
Toronto	Privacy-by-design policies via public agency (<u>Sidewalk Toronto case</u>)	Project was canceled in 2020 amid massive public feedback and backlash; became a global case study in community accountability

If you'd like to learn more, see the full project, including a policy brief explaining the fellows' core recommendations, at aspenpolicyacademy.org/project/nyc-computer-vision-deployment-2025.



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