OFFICE OF OPERATIONS

OPERATIONS ORDER NO. 3 July 16, 2025

SUBJECT: DRONE AS FIRST RESPONDER PILOT PROGRAM

BACKGROUND: Drone as First Responder (DFR) is an innovative approach to law enforcement in which a small Unmanned Aircraft System (sUAS) is utilized as a resource during incidents as a first-line-of-response tool. In a DFR format, the sUAS is deployed to a location that requires law enforcement response before officers arrive on scene, providing real-time aerial surveillance, situational awareness, and intelligence to responding officers and command centers.

PURPOSE: The Office of Operations (OO) is launching a pilot program to assess the viability of DFR in the large and geographically diverse City of Los Angeles. Other law enforcement agencies have found this technology to be beneficial, and the Department wants to ensure its due diligence by conducting a proper evaluation.

The purpose of this Order is to outline the parameters by which the DFR Pilot Program will operate and the use of the sUAS by the OO. This Order does not revise, update, or supersede the Office of the Chief of Police's Special Order No. 4, *Small Unmanned Aerial System Program Deployment Guidelines and Procedures - Renamed and Revised; and, Small Unmanned Aerial System Deployment Log, Form 15.53.01 - Renamed and Revised*, published June 24, 2025.

> **Note:** This pilot program policy is designed to be comprehensive, but it may not account for every potential scenario. The pilot phase is essential, as it allows real-world evaluation, adjustments, and refinement before full implementation.

DEFINITIONS:

Small Unmanned Aircraft System: A remotely-operated small unmanned aircraft system without any human pilot, crew, or passengers on board. Additional frequent identifiers are Quadcopter, Model Aircraft, Unmanned Aerial Vehicle or UAV, Unmanned Aircraft System or UAS, small Unmanned Aircraft System or sUAS, and Unmanned Aircraft or UA.

Small Unmanned Aircraft System Deployment: Any sUAS flight operation performed for an official Department purpose that is within the scope of permissible uses.

Small Unmanned Aircraft System Operator/Remote Pilot in Command (RPIC): A specially trained Department employee assigned to a cadre shall possess a valid Remote Pilot Certificate (Part 107) obtained from the Federal Aviation Administration (FAA). The RPIC is responsible for the safe operation of a sUAS and is the person in charge of launching, maneuvering, and landing the drone.

Small Unmanned Aircraft System Training Flight: Any sUAS flight operation performed exclusively for the purpose of training, testing, or proficiency checks.

Official Department Purposes: Official Department purposes includes any law enforcement purpose (except those identified as prohibited uses), training, participation in ceremonial and community events, and development of educational and promotional videos.

Visual Observer (VO): A Visual Observer is a person who maintains visual contact with the sUAS during flight, scanning the surrounding airspace to identify potential obstacles or hazards, and communicates that information to the sUAS operator.

> **Note:** Pursuant to the Department's FAA Certificates of Waiver, operations may be conducted without a VO under specific, approved conditions. As such, the deployment of a VO will be determined based on operational needs and FAA-approved requirements.

Government Code Section 7070 et. seq.: On September 30, 2021, California Governor Gavin Newsom signed Assembly Bill (AB) 481, establishing California Government Code Section 7070. The AB 481 requires law enforcement agencies to obtain approval from the relevant governing body (such as the City Council or Board of Police Commissioners) before taking certain actions related to the funding, acquisition, or use of military equipment. The term "military equipment" and the equipment classified as military equipment are defined in Government Code section 7070.

PROCEDURES:

Certification and Training. Eligibility for the DFR Pilot Program requires the following training and certifications to ensure sUAS operators can demonstrate their understanding of FAA regulations, operating requirements, and proficiency for safely flying sUAS for the Department:

- Possess a valid Remote Pilot Certificate (Part 107) from the FAA prior to attending any Department sUAS training; and,
- Complete a Department-approved sUAS training and any subsequent required training updates.

Objectives of Drone as First Responder. The operations of the DFR Pilot Program should be conducted with the following objectives to enhance public safety:

- Reduce response times to calls for service;
- Document incidents for criminal prosecution;
- Optimize Department resources;
- Aim to enhance officer safety; and,
- Help ground personnel assess situations more effectively.

I. **PERMISSIBLE USES.** Only authorized sUAS operators who have completed the required training shall be permitted to operate the sUAS. Only Department-approved sUAS and equipment shall be used to conduct sUAS deployments. A sUAS operator

may deploy a sUAS only for official Department purposes and in a manner that respects the reasonable expectation of privacy, pursuant to all applicable laws and regulations.

II. PROHIBITED USES. Department sUAS shall not:

- Be deployed or used in violation of the City of Los Angeles municipal laws, California State laws, the United States Constitution, any FAA regulations, or published flight restrictions (absent waiver);
- Be used to unlawfully harass, intimidate, or discriminate against any individual or group;
- Be used to target a person based solely on actual or perceived characteristics, such as, race, color, religion or creed, age, national origin, ethnicity, immigration status, gender (including gender identity or expression), sexual orientation, disability, or military status;
- Be used to record or photograph First Amendment assemblies for the purpose of identifying participants who are not engaged in unlawful conduct;
- Be equipped with any weapon system or facial recognition software;
- Be used as a weapon;
- Be deployed when weather conditions or other hazards prevent the safe operation of the aircraft or in a manner exceeding the manufacturer's recommendations;
- Be used for personal business of any kind; and,
- Be used in a manner that is contrary to any additional restrictions imposed by the sUAS Program Manager or the OO sUAS Coordinator.

III. OFFICER'S RESPONSIBILITIES. All members within the DFR Pilot Program will have the capacity to act as RPICs and VOs. The officers shall receive training on the operation and basic maintenance of the sUAS. The DFR Pilot Program Cadre will retain the responsibilities delineated below:

A RPIC's responsibilities include:

- Checking in and out with the watch commander if a supervisor is not present;
- Operating, launching, keeping on course, and landing the sUAS safely;
- Conducting safety tests;
- Ensuring that manned aircraft always take priority;
- Monitoring sUAS performance;
- Assessing sUAS systems' capabilities;
- Checking the sUAS at start of watch to ensure safe and proper operation;
- Analyzing weather forecasts to ensure safe flights;
- Documenting flight logs;
- Only operating a single sUAS at a time;
- Ensuring that the camera is forward-facing upon take-off and while en route to a specific incident;
- Planning sUAS flight routes;
- Establishing command and position while the sUAS is in flight;

- Maintaining awareness of restricted airspace;
- Maintaining open lines of tactical communication with patrol units, airships, etc.;
- Utilizing the Automatic Dependent Surveillance-Broadcast, commonly referred to as ADS-B;
- Gathering information or producing aerial recordings;
- Documenting incidents upon sUAS arrival;
- Tagging and categorizing each individual video on *Evidence.com*;
- Advising involved patrol officers of an incident captured on the sUAS;
- Ensuring the sUAS does not endanger the life or property of another; and,
- Adhering to strict FAA regulations and addressing privacy concerns.

Note: Any cadre member acting as the RPIC has the final decision on whether or not the sUAS will be deployed.

A VO's responsibilities include:

Note: Pursuant to the Department's FAA Certificates of Waiver, operations may be conducted without a VO under specific, approved conditions. As such, the deployment of a VO will be determined based on operational needs and FAA-approved requirements.

- Maintaining the visual line of sight with the sUAS;
- Maintaining an open line of communication with the RPIC;
- Identifying and communicating hazards in the sUAS's surroundings;
- Ensuring that manned aircraft always take priority;
- Maintaining reasonable knowledge of the sUAS's location, altitude, and direction of flight;
- Retaining the rooftop remote and ensuring it is operational and easily accessible for immediate control;
- Observing the airspace for other air traffic or hazards; and,
- Performing equipment testing, troubleshooting, and maintenance.

IV. OFFICE OF OPERATIONS SMALL UNMANNED AIRCRAFT SYSTEM CADRE RESPONSIBILITIES. The OO sUAS Cadre consists of personnel assigned to OO sUAS operations. The DFR Pilot Program is supervised by the OO sUAS Coordinator. All cadre members are responsible for the safe operation of the sUAS as used for one of the permissible uses.

Note: Small Unmanned Aircraft System Cadre members shall not operate a personal sUAS while on duty.

V. SMALL UNMANNED AIRCRAFT SYSTEM SUPERVISOR'S RESPONSIBILITIES. All flights involving police activity shall be documented to ensure accountability, transparency, and oversight. The supervisor's responsibilities for the DFR Pilot Program include:

- Checking in and out with the watch commander;
- Ensuring RPIC and VO officers' compliance with their responsibilities;
- Ensuring that all flights adhere to FAA regulations and state law;
- Liaising with nearby airports and towers to establish and maintain open lines of communication with airport/tower personnel;
- Managing equipment;
- Overseeing the maintenance of sUAS and other equipment and ensuring that they are operational;
- Coordinating with patrol units;
- Fulfilling information and sUAS footage requests;
- Ensuring operations are documented;
- Maintaining documentation of all flight operations/flight logs, training records, and certifications;
- Maintaining adherence to the Government Code Section 7070 et. seq., complaint policy; and,
- Monitoring the program.

VI. WATCH COMMANDER RESPONSIBILITIES. It is the watch commander's responsibility to document that DFR Pilot Program personnel are on duty that day, along with any relevant information in their *Watch Commander's Daily Report*, Form 15.80.00.

VII. AREA COMMANDING OFFICER RESPONSIBILITIES. The Area Commanding Officer (CO) should maintain general awareness of the program and provide support as needed. Additionally, COs should ensure access to Area resources to facilitate program operations.

VIII. BUREAU COMMANDING OFFICER RESPONSIBILITIES. The bureau CO should maintain general awareness of the program and ensure that Area COs support the DFR program and provide access to Area resources to facilitate its operations.

IX. OFFICE OF OPERATIONS SMALL UNMANNED AIRCRAFT SYSTEM COORDINATOR'S RESPONSIBILITIES. The Assistant to the Director, OO, will designate the OO sUAS Coordinator who will exercise line command over the operations of the DFR Pilot Program. The sUAS Coordinator shall possess a Remote Pilot Certificate (Part 107). The OO sUAS Coordinator will be responsible for the following:

- Monitoring the progress of the DFR Pilot Program;
- Overseeing and ensuring compliance with Department policy, FAA regulations, federal regulations, applicable laws, notifications, training, mandated tracking of

sUAS activity, and remaining apprised of changes in sUAS industry best practices;

- Ensure the personnel assigned to the DFR Pilot Program adhere to the policies outlined in this Order;
- Verifying all sUAS operators' training and Remote Pilot Certificates (Part 107) are captured and retained by the Department;
- Retaining all sUAS deployment documentation and providing reports, as requested on sUAS deployments;
- Providing the sUAS Program Manager with the information and documentation for annual reporting to Audit Division, per Government Code 7070 et. seq.; and,
- Periodically inspect the program and complete necessary reports or updates to the Director of OO, sUAS Program Manager, or the Chief of Police.

Note: Further restrictions may be placed on the sUAS Cadre as appropriate for the mission by the OO sUAS Coordinator. The sUAS Program Manager may also place further restrictions on an sUAS Cadre as a result of a safety or risk management concern.

X. PROTECTION OF PRIVACY. The Department shall only collect, use, and disseminate information obtained from a sUAS for a permissible use. Operators must follow FAA altitude regulations and are prohibited from intentionally recording or transmitting images of any location from an elevation or proximity in which individuals would have a reasonable expectation of privacy (absent a warrant, exigent circumstances, or consent of the property owner). Operators shall take reasonable precautions to avoid inadvertently recording or transmitting images of areas where there is a reasonable expectation of privacy.

XI. DOCUMENTATION AND INSPECTION PROCEDURES. All OO sUAS Deployments shall be documented in the proper format. At a minimum, the documentation shall include the following:

- Deployment number (cadre/year/number), e.g., DFR 2025-1;
- Incident number;
- Time;
- Location;
- Reporting District;
- sUAS operator's Name and serial number;
- Purpose of the sUAS Deployment;
- Results of deployment; and,
- Date.

XII. RECORDING OF INCIDENTS. Recording of each incident shall begin at or near the scene of the incident and continue until the sUAS either leaves the location or the investigative or enforcement activity involving a member of the public has ended.

XIII. PROCEDURE FOR REVIEWING SMALL UNMANNED AIRCRAFT SYSTEM RECORDINGS IN CATEGORICAL USE OF FORCE INCIDENTS. If an officer is involved in a Categorical Use of Force (such as an officer-involved shooting), the officer shall not review the sUAS recording prior to being interviewed by Force Investigation Division.

XIV. DIGITAL RECORDINGS. Officers shall not copy, edit, alter, erase, or otherwise modify in any manner sUAS recordings except as authorized by law or Department policy.

For each incident recorded on a sUAS, the RPIC shall identify the event type and other information that best describes the content of the video (i.e., arrest, traffic stop, report).

Members of the OO sUAS Cadre should advise involved patrol officers of an incident captured on the sUAS, in order to document the footage under the heading labeled "Photos, Recordings, Video, DICV, BWV, and Digital Imaging" on all administrative and investigative reports (e.g., "The suspect's actions were recorded via sUAS.")

If any portion of an incident resulting in an arrest was captured by a sUAS, DFR Cadre members should advise involved patrol officers to identify the existence of sUAS recordings on all necessary forms, including the *City Attorney's Disclosure Statement*, Form 05.02.09.

All images, as well as video recordings captured by sUAS deployment, shall comply with Department Manual Sections 3/579.15, *Body-Worn Video Procedures*, and 3/405, *Confidential Nature of Department Records, Reports, and Information.*

XV. PUBLIC TRANSPARENCY PLATFORM. The Department retains a DFR Public Transparency Platform. This platform is designed to display flight paths, the types of calls to which the sUAS has responded, and other relevant data related to sUAS operations.

XVI. DATA RETENTION. Absent exigent or unexpected circumstances, such as a malfunction or technical issue, the sUAS Program Manager shall ensure all sUAS Deployments and associated data are captured and retained in accordance with Department policy. All video shall be stored in *Evidence.com.*

XVII. PERSONNEL COMPLAINTS. Conduct of Department personnel observed during the review of a sUAS recording in connection with an administrative investigation should focus on the object of the review. If minor misconduct is discovered during an investigation, the progressive discipline model shall be followed prior to framing an allegation for the minor misconduct discovered during the review. The supervisor discovering the minor misconduct is responsible for notifying the employee's commanding officer of the minor misconduct, who should evaluate the facts and circumstances surrounding the incident. The employee's commanding officer must use

sound judgment to determine the appropriate course of action while following the progressive discipline model.

All complaints and concerns regarding sUAS use will be documented and responded to in a timely manner, in compliance with Department policy and Government Code Section 7070 et. seq.

XVIII. COLLISION PROCEDURES. If a sUAS collision occurs during the operation of a sUAS, the sUAS operator shall:

- Request a patrol unit to respond to the location of occurrence to assess the incident, request additional resources as needed;
- Request that the patrol unit secure the site until a supervisor arrives at scene; and,
- Notify an OO sUAS supervisor. If the sUAS supervisor is not immediately available to respond, request a supervisor from the geographic Area of occurrence.

The OO sUAS supervisor will make notifications to the OO sUAS Coordinator, FAA, and National Transportation Safety Board as applicable.

Any questions regarding this Order should be directed to the Office of Operations, Evaluation and Administration Unit, at (213) 486-6050.

DOMINIC H. CHOI, Assistant Chief
Director, Office of Operations

Distribution "D"