



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



July 15, 2025

Sharmaine Moseley, Executive Director
Sheriff Civilian Oversight Commission
World Trade Center
350 South Figueroa Street, Suite 288
Los Angeles, California 90071

Via Electronic Submittal

Dear Ms. Moseley:

DRAFT UNMANNED AIRCRAFT SYSTEMS POLICY FOR COMMENT

The Los Angeles County Sheriff's Department (Department) previously provided notice to the Civilian Oversight Commission (COC) of its intent to revise its existing Unmanned Aircraft Systems (UAS) policy. We appreciated the discussion at our initial meeting on this concept.

The Department's committee charged by the Sheriff with developing a new policy has been actively meeting with other law enforcement agencies to learn about their respective approaches to using these devices. In addition, the committee has been researching various policies throughout the state and has developed the attached draft policy for discussion.

We look forward to our meeting with the COC's Ad Hoc Technology Committee to discuss this matter and to receiving your comments regarding this draft revised policy. We respectfully request any written comments on this draft policy by July 25, 2025, and to obtain your availability for a follow-up meeting during the week of July 28, 2025.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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Ms. Moseley

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July 15, 2025

Thank you in advance for your attention to this matter. Should you have any questions or concerns regarding this matter, please contact Lieutenant Tri Hoang who will be happy to assist you.

Sincerely,

ROBERT G. LUNA, SHERIFF



APRIL L. TARDY
UNDERSHERIFF

EXECUTIVE SUMMARY

This revision (2025-415-01) to the Los Angeles County Sheriff's Department's Manual of Policy and Procedures (MPP) will revise section 5-09/570.00, Unmanned Aircraft System (UAS) Procedures to *Unmanned Aerial System (UAS) Operations*.

This proposed amendment to the Los Angeles County Sheriff's Department's Manual of Policy and Procedures section supersedes all previous versions of this policy.

This proposed amendment was requested by Captain Robbie Royster of Special Enforcement Bureau.

Staff Assignment: Sergeant Stephanie Hile, Field Operations Support Services, at (323) 890-5411.

This proposed amendment is presented in legislative format. Proposed additions, amendments and/or revisions are **highlighted**. Deletions to existing policy/text are indicated by ~~strikeout~~.

5-09/570.00 – Unmanned **Aerial Aircraft System (UAS) Operations Procedures**

~~All requests for the use of the unmanned aircraft system (UAS) shall be evaluated and authorized or denied by the Special Enforcement Bureau (SEB) team commander.~~

~~The Department is committed to ensuring all deployments of a UAS are conducted in accordance with federal and state law.~~

~~The UAS operator shall be responsible for, and is the final authority over, the actual operation of a UAS. UAS operators have an absolute authority to reject or ground flights based on personal safety, public safety, or violation of Federal Aviation Administration (FAA) regulations. UAS operators shall be responsible for compliance with SEB unit orders, Department policy, and FAA regulations.~~

~~UAS operators shall be cognizant of, and committed to, maintaining the privacy and constitutional rights of individuals when operating a UAS. The default mode of a UAS camera shall be non-recording. If circumstances require use of the recording functions of the camera, the operator shall obtain authorization from the SEB team commander to turn on the record function of the camera. The use of the record function shall be noted on the initial incident report by the handling deputy. Any recorded video footage shall only be retained for a period of two years unless there is a pending criminal case, civil action, or statute requiring retention of the video footage for a longer period of time. Video footage may also be retained longer than two years for training purposes if no one outside of Department personnel is identifiable in the video.~~

~~UAS operators are responsible for making a Public Notice to Airmen (NOTAM) and all required FAA notifications prior to operating an UAS.~~

~~An SEB team commander shall be responsible for notifying and coordinating with the Aero Bureau watch commander, rank of sergeant or above, prior to any UAS operations.~~

~~The SEB unit commander shall notify the executive director of the Civilian Oversight Commission (COC), within 48 hours, of any authorized or unauthorized use of a UAS. The SEB unit commander should also provide the COC with a report regarding all operational uses of a UAS, the type of mission for which such use was approved, the results of such uses, and whether or not the uses were authorized.~~

Purpose

To establish guidelines for the safe, authorized, and effective use of unmanned aerial systems (UAS). UAS can serve as a force multiplier to increase community and officer safety, act as a valuable de-escalation tool, reduce response times, provide enhanced situational awareness, and support personnel in the course of their duties, including the accurate reconstruction of complex traffic accidents and crime scenes.

The Sheriff will select a Department-wide UAS Program Commander who will oversee overall management of UAS Operations, including:

- Compliance with laws and policies;
- Reporting usage to oversight bodies and public website;
- Establishing training standards;
- Acting as the liaison with the Federal Aviation Administration (FAA) and National Transportation Safety Board (NTSB);
- Developing and maintaining equipment standards;
 - All Department UAS shall meet technical specifications established by the UAS Operations Unit and may only be purchased, donated, or leased by organizations or contract cities in accordance with Department protocols. Donated or leased UAS equipment must be reviewed and approved by the UAS Operations Commander prior to acceptance or use.
 - All software, support systems, or ancillary equipment used in conjunction with Department UAS shall be reviewed and approved by the UAS Operations Commander prior to acceptance or use.
- Overseeing the Safety Management System (SMS) and the UAS Management Software; and
- Coordinating with individual Unit Commanders and their UAS Program Coordinators to ensure compliance with Department policies and placing restrictions on unit usage because of safety or risk management concerns.

Definitions

Pursuant to Department guidelines and FAA regulations the following definitions will be used in Unmanned Aerial System operations.

Unmanned Aerial System (UAS) - A UAS is a small, unmanned aerial, including the equipment necessary for the safe and efficient operation of that aircraft. It is defined by statute as an aircraft that is operated without the possibility of direct human intervention from within or on the aircraft.

Beyond Visual Line of Sight (BVLOS) - Operation of a UAS beyond the distance at which the remote pilot in command (RPIC) or visual observer (VO) can maintain unaided visual contact with the aircraft to ensure safe and effective control of the flight.

Drone as First Responder (DFR) - The use of a UAS, deployed as an initial responding unit to active calls for service, providing aerial surveillance, real-time video, and tactical overwatch to responding field personnel.

Field Deployments - Situations in which a UAS is deployed by a UAS Operator while in the field.

UAS Operator - A trained, certified member of a patrol station or unit authorized to deploy and operate UAS for missions consistent with this policy.

Remote Pilot-in-Command (RPIC) - The certified deputy or personnel responsible for the safe and lawful operation of the UAS during deployment.

Visual Observer (VO) - A person who assists the RPIC in the duties associated with collision avoidance. This includes, but is not limited to, avoidance of other traffic, clouds, obstructions, and terrain.

Controlled Airspace - An airspace of defined dimensions within which air traffic control (ATC) services are provided to IFR flights and to VFR flights in accordance with the airspace classification (FAA Class B, C, D or E).

Flight Supervisor - The on duty Watch Commander, Incident Commander, or designated supervisor responsible for approving deployments consistent with this policy and reviewing mission outcomes.

UAS Program Coordinator - Personnel holding the rank of Sergeant or above that is designated to oversee the unit's UAS operations.

UAS Department Program Commander – Personnel holding the rank of Lieutenant or above that is designated to oversee UAS Operations Department-wide.

UAS Management Software - Software used for the management, tracking and maintenance of the Department UAS fleet.

Safety Management System(SMS) - Is a structured framework designed to promote and ensure safe operation of the Department's UAS Program. SMS encompasses proactive and reactive strategies to analyze, identify and mitigate hazards.

Deployments

Unmanned aerial systems may be utilized to enhance the Department's mission of protecting lives and property. All Department UAS deployments shall be conducted in a manner that is consistent with the requirements and protections of the United States Constitution, the California State Constitution, and pursuant to all applicable laws and regulations.

The policy authorizes the deployment of UAS as an initial responding resource to calls for service in designated patrol areas. The proactive UAS may be launched for real-time aerial overwatch, crime scene awareness, and tactical assessment prior to the arrival of ground units. The authority to deploy remains with the on-duty Watch Commander (acting as Flight Supervisor), who shall ensure compliance with FAA rules and this policy, including required reporting to the UAS Operations Commander.

Specialized units, such as the Special Enforcement Bureau (SEB), Detective Division units, Emergency Operations Bureau (EOB), and other non-patrol-based bureaus, may deploy UAS in support of tactical, investigative, or emergency response operations. All deployments must comply with FAA regulations, relevant unit orders, and this policy. Use of a UAS by specialized units shall be incident-driven and must be approved by the designated Incident Commander overseeing the scene. UAS missions conducted for crime scene documentation, search and rescue, surveillance during exigent operations, or support of warrant service shall be documented and reported to the UAS Operations Commander within 24 hours of deployment.

The UAS flight crew (i.e., UAS Operator, RPIC, and VO) shall take reasonable precautions to avoid inadvertently recording or transmitting images of area(s) where there is a reasonable expectation of privacy. Reasonable precautions can include, for example, deactivating or turning imaging devices away from such areas or persons during UAS operations.

UAS deployments shall only be conducted by trained and certified personnel under the supervision of a Flight Supervisor (the station Watch Commander), Incident Commander, or the UAS Operations Commander. All operations shall meet the following standards:

- All UAS operators must be FAA certified and complete Department-approved UAS training;
- All flights must adhere to regulations established by the Federal Aviation Administration; and

- Deployments to monitor a pre-planned public event must be done with the approval of the unit's Division Chief.

NOTE: A UAS deployment alone does not constitute as a response to a call for service MPP section 2-06/030.05, Patrol Responsibility.

Prohibition Uses

Department UAS shall not:

- Be used to unlawfully harass, intimidate, or discriminate against any individual or group;
- Be used to randomly surveil any member of the public;
- Be used to record or photograph any First Amendment assemblies for the purpose of identifying participants who are not engaged in unlawful conduct;
- Be used in conditions that create an undue hazard or would prevent the safe operation of the aircraft or in a manner exceeding the manufacturer's recommendations;
- Be used for any personal business;
- Be equipped with weapons or any form of less-lethal munitions, or any facial recognition software; and
- Be used in a manner or used with any software or added equipment that is contrary to any additional restrictions imposed by the Department-wide UAS Program Commander.

No Department member shall deploy a personally owned UAS while on duty.

Training and Certification

All drone operators shall maintain a current FAA certification and complete the Department's designated training course. UAS Operations Commander shall maintain records of certification, training, and flight hours for all operators.

Data Retention and Evidence

Absent exigent or unexpected circumstances, the UAS Program Coordinator shall ensure any UAS deployment and associated data are captured and retained in accordance with Department policy.

Recording

Recording each incident shall begin at or near the scene of the incident and continue to record until the UAS leaves the location or the investigative or enforcement activity has ended. While in transit, UAS camera systems must be directed toward the horizon and may only be activated at or near the incident scene. .

Field Deployments

When deploying a UAS in the field, the UAS operator should consider the use of a VO when practical. The use of a VO shall be required in controlled airspace.

UAS Program Coordinator Responsibilities

The UAS Program Coordinator shall:

- Ensure their unit's UAS fleet is properly maintained, and the equipment is inspected on a regular basis;
- Ensure all maintenance is properly documented;
- Ensure any personnel operating a UAS within their unit has obtained the proper certification and training;
- Ensure a weekly report of all UAS usage is submitted to the UAS Operations Commander; and
- Ensure all reporting requirements pursuant to Government Code 7070 are adhered to.

Accident Reporting

In the event the UAS is involved in a collision or accident, the UAS Operator shall immediately notify the on duty Watch Commander and UAS Operations Unit. The UAS Operations Unit shall be responsible for notifications to the FAA and NTSB as applicable.

If a Department UAS is involved in a collision or incident resulting in damage, injury, or potential liability, the Remote Pilot in Command (RPIC) shall immediately notify the on-duty Watch Commander and the UAS Operations Unit. If the incident involves any injury, damage to non-Department property, or poses civil liability risk, a supervisor shall respond to the scene to initiate proper documentation and notifications. The supervisor shall also notify the Risk Management Bureau and the Traffic Services Detail in alignment with Department protocol for deputy-involved traffic collisions? (Incidents involving injury to non-employees, however minor, while on County property (owned or leased) must be reported on the Non-Employee Injury Form (SH-AD-668) and distributed as indicated on the form .

The incident scene shall be documented thoroughly, including photographs of the UAS, the surrounding environment, and any involved property. Supervisory personnel shall collect statements from involved staff and witnesses, obtain identification of any civilians affected, and ensure preservation of relevant digital flight logs and data from the drone. The RPIC shall prepare a detailed memorandum summarizing the mission type, conditions at the time of the incident, contributing factors, and any operational anomalies that occurred. The UAS Program Coordinator for the unit shall conduct a review of the incident, and a memo shall be submitted to the UAS Operations Unit detailing the collision.

All UAS collisions that meet FAA-reportable thresholds—such as incidents involving serious injury, loss of consciousness, or property damage in excess of \$500 (excluding the drone itself)—shall be reported by the UAS Operations Unit to the Federal Aviation Administration (FAA) and the National Transportation Safety Board (NTSB) within ten calendar days, as required under 14 CFR Part 107. A “Damage to County Property” report shall also be completed and submitted to the Risk Management Bureau, consistent with Department policy for deputy-involved vehicle accidents. All documentation, including photos, witness statements, and internal reports, shall be retained by the UAS Operations Unit.

Use Of UAS Owned or Operated by an Outside Agency

Personnel may request and utilize the UAS of an outside agency when operational needs warrant support and all the following conditions are met:

- The deployment must comply with the standards, restrictions, and operational expectations outlined in MPP;
- The use of an outside agency’s UAS must be authorized by the on-duty Watch Commander or Incident Commander and reported to the UAS Operations Unit within 24 hours of deployment; and
- A complete copy of any digital data collected by the outside agency’s UAS must be obtained by LASD personnel. Any digital media must be retained in accordance with Department policy.

Reporting of Each Deployment

The operator of each UAS must report each deployment and use of the UAS. The reporting shall take place in the Military Equipment Management System (MEMS), the electronic UAS system log. The electronic log will provide pertinent information including the incident number, the time, location, UAS operator’s identifying information, the type of incident, and the results of the deployment.

Military Equipment Reporting

UAS devices are considered military equipment under California Government Code Section 7070, et seq., and require annual reporting on their use and involved costs. The UAS Program Coordinator is responsible for collecting all inventory, procurement, recording costs, managing training requirements, and ensuring accurate reporting in the Department’s annual military equipment report.

Public Notification and Transparency

Before a station begins use of UAS pursuant to this policy, a community outreach plan shall be developed and implemented in collaboration with local stakeholders. Metrics evaluating flight time, response time reduction, evidentiary value, community

satisfaction, and complaint trends shall be collected. These metrics shall be reported quarterly and evaluated for program effectiveness at the station or unit level.

The UAS Operations Unit shall maintain a UAS dashboard on the Department's Transparency Page which will be updated regularly, but not less than monthly. This dashboard shall include information on all UAS deployments except for those related to ongoing investigations.

In addition, the Department will provide the Civilian Oversight Commission with an annual report summarizing UAS usage (including the number and situations in which UAS devices were used), the results and effectiveness of any deployments, the nature and number of any complaints received, and any policy exceptions.