

Attachment D

Unmanned Aerial System (UAS)

622.1 PURPOSE AND SCOPE

The purpose of this policy is to establish guidelines for the use of unmanned aerial systems (UAS) and for the storage, retrieval and dissemination of images and data captured by the UAS.

The department realizes the use of unmanned aerial systems requires careful oversight to protect privacy, civil liberties, and public trust while supporting legitimate public safety operations.

622.1.1 DEFINITIONS

Definitions related to this policy include:

Drone as First Responder (DFR) – The use of an Unmanned Aircraft System (UAS) deployed in response to calls for service or incidents to provide real-time situational awareness prior to or in support of arriving personnel.

Remote Pilot in Command (RPIC) – The person designated by the department who is responsible for the operation and safety of UAS in accordance with applicable FAA

Unmanned aerial system (UAS) - An unmanned aircraft of any type that is capable of sustaining directed flight, whether preprogrammed or remotely controlled (commonly referred to as a drone or an unmanned aerial vehicle (UAV)), and all of the supporting or attached systems designed for gathering information through imaging, recording or any other means.

Visual Observer (VO) – A person assigned to assist the Remote Pilot in Command by maintaining visual line of sight of the UAS, monitoring the surrounding airspace, and communicating hazards or other relevant information to ensure safe operation.

622.2 POLICY

Unmanned aerial systems may be utilized to enhance the department's mission of protecting lives and property when other means and resources are not available or are less effective. Any use of a UAS will be in strict accordance with constitutional and privacy rights and Federal Aviation Administration (FAA) regulations.

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622.3 PRIVACY

The use of the UAS potentially involves privacy considerations. Absent a warrant or exigent circumstances, operators and observers shall not intentionally record or transmit images of any location where a person would have a reasonable expectation of privacy (e.g., residence, yard, enclosure). Operators and observers shall take reasonable precautions to avoid inadvertently recording or transmitting images of areas where there is a reasonable expectation of privacy to include deployments over sensitive locations, including schools and hospitals. When feasible and consistent with the mission, operators shall use flight positioning, camera orientation, or other reasonable measures to minimize the incidental capture of individuals, bystanders, and private areas unrelated to the authorized purpose of the deployment.

622.4 USE OF UAS

Each UAS deployment shall be tied to a call for service, investigation, planned public safety operation, emergency response, or other specific and articulable public safety purpose. UAS shall not be used for generalized surveillance, random patrol, or roving monitoring.

Only authorized operators who have completed the required training as described in section 622.7 shall be permitted to operate the UAS. Deployment of the UAS is authorized by the Chief of Police or their designee, for the following missions:

- Drones as a First Responder (DFR) to optimize response to calls-for-Service that include but are not limited to:
 - In-Progress crimes
 - Calls-for-service where a response by ground units may be delayed
 - Calls-for-service where real-time aerial intelligence can provide responding officers with immediate, situational awareness to enhance their response or prevent unnecessary, high-risk contact (de-escalation)
- Tactical operations including SWAT operations
- Crime scene documentation and Traffic collision documentation
- Searches for missing or endangered people
- Searches for suspects believed to be in a defined perimeter
- Exigent circumstances in the immediate defense of life or great bodily harm
- Pursuant to a search warrant, arrest warrant or court order
- Critical incident management, disaster response and damage assessment
- Counter Terrorism operations
- Project planning and threat assessment imaging of infrastructure and facilities
- Mapping critical infrastructure

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- UAS may be deployed during permitted events, parades, festivals, sporting events, and other large public gatherings where the Department has a defined public safety, traffic management, emergency response, or security role. These events are distinct from protests, demonstrations, and other First Amendment-protected activities, which are governed separately under this policy. Deployments under this section shall be limited to situational awareness, monitoring crowd size and movement, managing traffic and pedestrian flow, identifying safety hazards, coordinating emergency response, or responding to specific criminal activity or public safety incidents.
- UAS may be deployed at events involving First Amendment-protected activity only when a specific, articulable public safety concern, criminal complaint, or exigent circumstance exists and only upon prior supervisory authorization when practicable.

The Chief of Police or authorized designee may approve the use of UAS outside of these guidelines in the interests of public safety where there is a specific and articulable threat to the safety of the public or police.

Use of vision enhancement technology, including thermal imaging or other imaging equipment not generally available to the public, may be used to assist in locating a suspect believed to be within a defined search area when officers are lawfully present and the viewing is limited to areas where no reasonable expectation of privacy exists or when in compliance with a search warrant or court order. Any use based on exigent circumstances shall be limited to the scope and duration of the exigency and should be documented when practical. In all other instances, legal counsel should be consulted.

Nothing in this policy is intended to prohibit the deployment of a UAS when necessary to protect life or prevent serious bodily injury, provided such deployment is consistent with applicable law and FAA regulations.

UAS operations shall remain under human oversight by an authorized Remote Pilot in Command or as soon as practical when a UAS is autonomously launched in response to a call for service. Automated safety features, including obstacle avoidance, return-to-home, autonomous launch, or similar functions, may be used when consistent with FAA regulations, department training, and the authorized mission.

All UAS equipment will be marked as Law Enforcement equipment in a manner that will not impact flight or safe operation when possible.

622.5 Interagency Coordination

UAS assistance provided to outside agencies or other City departments shall be for an authorized public safety purpose, approved by the Chief of Police or authorized designee, and documented in accordance with this policy. Data collected during interagency operations shall be handled consistent with this policy, applicable law, and the authorized purpose of the deployment.

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Such coordination may include:

- Search and rescue operations
- Wildland or structural fire response
- Post-disaster damage assessment
- Hazardous material incidents
- Fireworks suppression or enforcement operations
- Emergency evacuation operations

622.6 PROHIBITED USE

The UAS shall not be used:

To conduct random surveillance activities.

To assist with immigration enforcement.

To target a person based solely on actual or perceived characteristics, such as race, ethnicity, national origin, religion, sex, sexual orientation, gender identity or expression, economic status, age, cultural group, or disability.

To conduct aerial imaging of a person based solely on individual characteristics, such as, but not limited to race, ethnicity, national origin, disability, gender or sexual orientation. This does not apply in situations where these characteristics are specified and paramount to the identification and/or apprehension of a particular person, or group of people, that have committed or are committing a certain felony.

To harass, intimidate, or discriminate against any individual or group.

To conduct personal business of any type.

The UAS shall not be weaponized

The installation, activation, or use of biometric surveillance systems, including facial recognition, in connection with portable recorders is prohibited (Penal Code § 832.19). Reference PPD Policy 447.

Members shall not use facial recognition to actively surveil members of the public through any camera or video device unless the person(s) are under an active criminal investigation or the surveillance is in response to an imminent threat of life. Reference PPD Policy 447.

Members shall not use facial recognition on live stream unless there is an imminent threat to life. Reference PPD Policy 447.

UAS shall not be used to monitor, track, or document individuals or groups solely because they are engaged in constitutionally protected speech, assembly, or association. This does not prohibit UAS use when necessary for public safety, emergency response, crowd safety, protection of life, or response to an emerging threat.

UAS footage shall not be used to identify individuals engaged in lawful expressive activity except when reasonably necessary as part of a specific criminal investigation.

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622.7 UAS TRAINING

Personnel assigned to operate or support UAS operations shall complete department approved training and obtain required certifications and/or licenses prior to participating in operations.

Remote Pilots in Command (RPIC) shall possess and maintain a valid FAA Remote Pilot Certificate in accordance with 14 C.F.R. Part 107, complete department approved training, and demonstrate proficiency in the safe operation of the assigned UAS.

RPICs shall maintain compliance with FAA recurrent training requirements and participate in periodic proficiency activities as established by the department.

Personnel assigned as Visual Observers (VO) shall complete department approved training appropriate to their assigned role, which shall include the roles and responsibilities of a VO, communication requirements, and basic airspace and safety awareness.

UAS training and proficiency shall be documented in accordance with department procedures.

RPICs shall operate UAS in a safe and responsible manner consistent with training, FAA regulations, Department policy, and applicable law. RPICs should evaluate weather, airspace, equipment status, mission needs, and risks to persons or property on the ground, and may modify, delay, terminate, or return the UAS to base when conditions make continued flight unsafe.

622.8 UAS MISSION DOCUMENTATION

All UAS deployments will be documented. Documentation should identify the authorization basis for the deployment, including whether the deployment was routine, exigent, interagency, or approved outside the listed uses by the Chief of Police or authorized designee.

Mission documentation should include, when applicable:

- Date and time of deployment
- Location of operation
- Mission purpose or category
- Pilot in command and assisting personnel
- UAS platform used
- Whether images or video were captured
- Associated case number if applicable
- General outcome of the mission

Use of the UAS will be reported annually in the Military Equipment Report pursuant to AB 481.

622.9 RETENTION OF UAS DATA

All recordings of evidentiary value shall be retained for a period consistent with the requirements of the organization's records retention schedule, but no less than 1 year pursuant to Government Code § 34090.6. Reference PPD Policy 450.

The department shall make reasonable efforts to minimize the collection and retention of data that is not relevant to an authorized law enforcement or public safety purpose.

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622.10 ACCESS AND SHARING OF UAS DATA

Access to UAS data shall be limited to authorized personnel and legitimate law enforcement, public safety, training, administrative, legal, or evidentiary purposes. UAS data shall not be used for unrelated secondary purposes. Sharing with local, state, federal, or task force partners shall be for a legitimate public safety or law enforcement purpose and consistent with applicable law and department policy.

PROGRAM COORDINATOR

The Chief of Police will appoint a program coordinator who will be responsible for the management of the UAS program. The program coordinator will ensure that policies and procedures conform to current laws, regulations, and best practices and will have the following additional responsibilities:

- Coordinating the FAA Certificate of Waiver or Authorization (COA) application process and ensuring that the COA is current, and/or coordinating compliance with FAA Part 107 Remote Pilot Certificate, as appropriate for department operations.
- Ensuring that all authorized operators and required observers have completed all required FAA and department-approved training in the operation, applicable laws, policies, and procedures regarding use of the UAS.
- Oversight of the Department's UAS training program and ensure that all personnel assigned as operators or observers receive the appropriate training consisted with FAA requirements and Department policy.
- Coordinating the completion of the FAA Emergency Operation Request Form in emergency situations, as applicable (e.g., natural disasters, search and rescue, emergency situations to safeguard human life).
- Maintain UAS inspection, maintenance, and record-keeping to ensure continuing airworthiness of a UAS, up to and including its overhaul or life limits.
- Facilitating law enforcement access to images and data captured by the UAS.
- Recommending program enhancements, practically regarding safety and information security.
- Ensuring that established protocols are followed by monitoring and providing periodic reports on the program to the Chief of Police.
- Maintaining familiarity with the FAA regulatory standards, state laws and regulations, and local ordinances regarding the operations of a UAS.
- Supporting periodic review of the UAS program, including review of deployment data, policy compliance, training compliance, complaints or concerns, and alignment with public safety objectives.
- Coordinating with the Military Equipment Coordinator, when applicable, to ensure UAS reporting is incorporated into AB 481 reporting, public transparency, and governing-body review processes.

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- Supporting public-facing transparency efforts regarding the UAS program, including general program information, policy updates, and aggregated deployment data, subject to operational security, officer safety, investigative integrity, and legal restrictions.
- Considering data security, reliability, public safety needs, applicable procurement requirements, and NDAA compliance when recommending UAS equipment or program enhancements.



MEMORANDUM

TO: Public Safety Committee

FROM: Latoya Patillo, Chair, Community Police Oversight Commission

RE: Community Police Oversight Commission Review Process for Pasadena Police Department Unmanned Aircraft System Policy

DATE: September 16, 2026

Purpose

The purpose of this memo is to provide the Public Safety Committee and City Council with an overview of the Community Police Oversight Commission's (CPOC) review process related to the Pasadena Police Department's (PPD's) proposed Unmanned Aircraft System (UAS) or Drone policy and to summarize the Commission's role in reviewing policies governing emerging law enforcement technologies.

In short, the CPOC's role is to understand community priorities regarding the technology and provide feedback to PPD as it develops its policy. The Commission is satisfied that PPD carefully considered the community priorities adopted by the CPOC and incorporated them into the proposed policy presented to the Commission at its July 9, 2026 meeting.

This memo details the process the Commission used, the community priorities developed through that process, and the subsequent collaboration between the CPOC, the Independent Police Auditor (IPA), and PPD. As any purchase decision is beyond the scope of the CPOC, this document is not intended as a recommendation regarding whether UAS technology should or should not be acquired or deployed.

Background

Section 2.60.110 of the Pasadena Municipal Code (PMC) stipulates that a key function of the CPOC is to provide input on police department policy. Consistent with that responsibility, the Commission's FY 2025-2026 Work Plan included an objective to review policies governing new and emerging law enforcement technologies and equipment and establish a model workflow for future policy reviews.

In addition to the Commission's responsibilities under the PMC, the review of emerging technology policy reflects the City Council's expressed interest in ensuring that significant public safety technologies are developed and implemented with appropriate transparency, community engagement, and policy oversight. Discussions before the City Council regarding surveillance technologies and other law enforcement equipment

have repeatedly emphasized the importance of community input and policy review as part of the evaluation process.

To support this work, the Commission established an Ad Hoc Committee and developed a structured process for reviewing policies governing proposed technologies. The UAS policy review served as one of the first applications of that process and helped inform the Commission's broader approach to technology governance and policy review.

Community Priority Development Process

To accomplish this work, the assigned Ad Hoc Committee met over several months with support from staff and consultation from the IPA. The committee reviewed drone policies from other jurisdictions, discussed applicable legal and regulatory considerations, evaluated emerging best practices, and considered community concerns and expectations regarding drone technology.

The committee's discussions focused on balancing legitimate public safety benefits with community concerns regarding privacy, accountability, transparency, data security, and civil liberties. Throughout the process, the committee sought to identify values and safeguards that could be incorporated into policy development before any future deployment of the technology.

As a result of this work, the committee developed a set of community priorities for PPD's Drone Policy organized around six broad categories (the full listing of the community priorities is included at the end of this memo):

- Safety
- Privacy and Civil Liberties
- Purpose and Authorized Uses
- Evaluation and Accountability
- Data Security
- Transparency and Community Benefit

Commissioner Lawrence Lurvey, who led the Ad Hoc Committee, presented the community-priority policy recommendations to the CPOC at its April 9, 2026, meeting. After substantive discussion and public comment, the Commission voted (6-0, with two abstentions and three absences) to approve the recommendations. The recommendations were subsequently transmitted to Chief Harris and PPD with the intent that they be considered during development of the Department's policy.

Pasadena Police Department Response

Following receipt of the Commission's recommendations, PPD informed the Commission that it would consider the community priorities during development of its UAS policy and implementation framework.

At the July 9, 2026, CPOC meeting, Lieutenant Anthony Russo presented PPD's proposed UAS policy. With minor modifications, the Department adopted all of the Commission's policy recommendations. During the presentation, Lt Russo reviewed each recommendation and outlined how the community priorities were incorporated into the draft policy, operational procedures, training requirements, oversight mechanisms, and program governance structure.

Following the presentation, public comment was taken, and Commissioners asked questions regarding implementation, accountability, reporting, transparency, and evaluation.

During the discussion, PPD acknowledged that the recommendation to clearly mark or otherwise identify drones as law enforcement assets was not explicitly included in the draft policy but could be added. Lieutenant Russo explained that law enforcement drones typically deploy specific lighting to indicate police use and noted that PPD will also apply identifying stickers to ensure the drones are clearly marked as Department property.

There was also discussion about adding language regarding large public gatherings to ensure the policy clearly addresses privacy considerations and safety during such events, particularly those involving First Amendment-protected activities. Commissioners further asked whether the policy could be more specific regarding regular audits, documentation of UAS deployment, and the metrics used to evaluate the program. PPD indicated it was open to incorporating these modifications.

The Commission subsequently voted (8–0, with two abstentions and one vacancy) to draft a memo to the City Council in support of PPD's proposed UAS policy. The Commission appreciates PPD's willingness to engage in this collaborative process and to provide detailed information regarding how community priorities were considered during policy development.

Ongoing Collaboration

Following the July presentation, discussions have continued among PPD and the IPA regarding policy language and implementation considerations. These discussions have focused on ensuring that the objectives reflected in the Commission's community priorities are clearly addressed through policy provisions, reporting practices, and accountability mechanisms while recognizing PPD's operational authority and responsibilities.

Consistent with the Commission's technology-review framework, these discussions have focused on collaborative policy development rather than approval or rejection of the technology itself. The process is intended to ensure that community expectations are identified early, communicated clearly, and considered throughout policy development and implementation planning.

Next Steps

The proposed UAS policy has now advanced to the next stage of review and discussion before the Public Safety Committee.

The Commission respectfully submits this summary to provide context regarding its involvement in the policy development process. The Commission believes the review demonstrates a collaborative model through which community priorities can be identified early, communicated transparently, and considered as new public safety technologies are evaluated and implemented. The Commission appreciates PPD's willingness to engage in this process and looks forward to continued dialogue as its UAS program develops.

Community Priorities for PPD's Drone Policy

1. Safety

- a. Drones shall be operated in a manner that minimizes the risk of physical injury to the public, officers, and property, and only under conditions where their use enhances, and does not compromise, overall public safety.
- b. Drones shall not be equipped with weapons of any kind.
- c. Comprehensive training and strict adherence to established policies are required to prevent injury or harm. Drone operations shall be conducted only by personnel who have completed required training and who comply with all applicable policies and procedures designed to minimize risk to the public, officers, and property.
- d. When deployed at large gatherings, additional safety measures should be considered.
- e. Drone operators must comply with all FAA regulations and certifications. Drones shall not be piloted in fully autonomous mode and must have human oversight in flight.

2. Privacy and Civil Liberties

- a. Prohibit the use of drones equipped with facial recognition or other biometric identification technologies, given the heightened risks such capabilities pose to privacy, civil liberties, and public trust.
- b. Adopt data-minimization practices that limit the retention of video or data collected while drones are transiting to or from an authorized deployment location, unless such data is directly related to the authorized purpose of the deployment.
- c. Implement operational practices that minimize the incidental capture of individuals, bystanders, and private areas unrelated to the authorized purpose of the deployment, using measures such as flight positioning and camera orientation.

- d. Prohibit the use of drones to monitor, track, or document constitutionally protected speech, assembly, or association, except where narrowly tailored.
- e. Apply heightened scrutiny and additional privacy safeguards to drone deployments over or near sensitive locations, including but not limited to schools, hospitals, and centers where people are exercising their constitutional rights to assembly or other protected rights. Drone use must be necessary and proportionate in those areas.
- f. Consider vendor origin and manufacturing practices, including whether drone products are manufactured domestically, as part of broader evaluations of data security, reliability, and public trust; procurement decisions should be driven by clearly defined public safety needs rather than vendor marketing, feature sets, or pricing strategies.

3. Purpose

- a. Each drone deployment must have a clearly stated purpose.
- b. Define clear authorization and approval requirements for drone deployments, including who shall approve use under routine conditions, who shall authorize use in exigent circumstances, and what, if any, documentation is required for each.
- c. Limit drone deployments to clearly defined and authorized purposes tied to specific scenarios or triggers, such as a call for service or an identified first-responder need, and prohibit use for generalized surveillance, routine patrol, or roving monitoring.
- d. Clearly define the circumstances under which drones may be deployed in response to mutual aid or external agency requests, including approval authority, permitted purposes, data-handling expectations, and documentation requirements.

4. Evaluation and Accountability

- a. Establish periodic review processes with clearly defined evaluation criteria to assess drone use, policy compliance, and alignment with stated public safety objectives.
- b. Ensure drone program governance and reporting practices comply with all applicable California laws and regulations, including but not limited to Assembly Bill 481 and related public reporting, governing-body review, and transparency requirements.
- c. Maintain a regularly updated, public-facing website that provides information about the drone program, including general deployment activity, policy updates, and evaluation findings.

- d. Define an organizational structure responsible for ensuring compliance with training requirements, policies, and operational procedures related to drone use. This should include designation of a sworn officer with primary responsibility for oversight and administration of the drone program, including coordination of training, compliance, and review activities.
- e. On a periodic basis, and consistent with applicable California law, including Assembly Bill 481, present the results of internal audits, evaluations, and compliance reviews to the City Council or other appropriate governing body to inform decisions regarding the continued authorization, modification, suspension, or discontinuation of drone use.

5. Data Security

- a. Establish data-security protocols that protect information collected through drone operations throughout its lifecycle, including collection, transmission, storage, access, retention, and deletion, consistent with applicable law-enforcement data-security standards and legal requirements.
- b. Limit access to drone-generated data to authorized personnel and uses directly related to the approved public safety purpose of the deployment and prohibit secondary use unrelated to that purpose.
- c. Clearly define and document the circumstances under which drone-collected data may be shared, limiting routine sharing to legitimate public safety purposes with trusted state and local agencies and in accordance with applicable privacy, security, and reporting laws.
- d. Establish clear limitations and approval requirements for sharing drone-generated data with federal authorities or other jurisdictions, consistent with California law, governing-body oversight requirements, and community trust considerations.

6. Transparency and Community Benefit

- a. Develop and implement a community engagement strategy prior to program launch and as the program evolves, to inform the public about the purpose, scope, and limitations of drone use.
- b. Ensure police drones are clearly marked and identifiable as law-enforcement assets whenever practicable, to promote transparency and public awareness.
- c. Drone use must demonstrate a clear public safety benefit, such as faster response times or crime reduction.