

Oral Comment from 9/2/26 Police Commission Meeting

1. Grey Tee Shirt Sweater, Long Hair
2. Marco (White Shirt, Glasses)
3. Brown Graphic Tee
4. Green Overshirt, Gray Tee Black N95 Mask
5. Black N95 Mask, White Henley Shirt
6. Brown Sweatshirt, Black N95 Mask
7. Brown Curly Hair, White Shirt, Glasses, Black N95 Mask
8. Graphic Dress, Black Tee Under, Glasses
9. Juan Albano (Floral Shirt, Light Beard)
10. Yahia Wizard (Black Shirt, Glasses, Beard)
11. Blonde Bob, Black Shirt, Glasses
12. Phoenix Schultz (Black Tee Shift, Plum/Cranberry Hair)
13. Jefferson (Brown Cardigan, Cream Shirt, Glasses)
14. Savannah (Black Sweater, Glasses, Long Hair)
15. Eggplant/Olive Striped Sweater, Long Hair
16. Blue Hoodie, Black Ponytail
17. Black Shirt, Cardigan, Glasses
18. Manny (Green Jacket, Grey Hoodie)
19. Brian Cox (Black Denim, Navy Polo, Glasses)
20. Carolyn Goosen (Black Cardigan, Mint Green Shirt)
21. Grey T-Shirt
22. Kate (Black Moto Jacket, Graphic Tee)
23. Steve Zoltan (White Hair, Glasses, Green Sweater, Burgundy Shirt, Black Jacket)

Written Comment from Public Forum 9/3/26 to 9/20/26

24. Peter Yoakum

25. Rosalie Chan
26. Linda
27. Frank Buffum
28. Deborah Garfinkle
29. Eleana Binder
30. Gaelan McKeown
31. Michelle Magee
32. Jason Wyman
33. Harold Uber Kellogg
34. Simone Baggetto
35. Barbara Wismer
36. William Ryland
37. Adrian Eraslan
38. Natalie Burdick
39. Ari Kohan
40. Yehya Abuzaid
41. Jennifer Keay Davidson
42. Taniya Lane
43. USF Undergraduate Law and Society
44. Public Defender's Office
45. Kimberly Rohrbach
46. Secure Justice
47. Ilona Yanez
48. Alex Williams
49. Luc Bouchard
50. Alyssa Dwyer

51. Aarav Iyer
52. Susan Green
53. PRISO
54. Roberto Alfaro
55. Brook Broughton
56. Savannah Landau
57. Sarah Gao
58. Ryan Maher
59. Jennifer Waggoner
60. Mary Scheib
61. Felicia Ann Tacto
62. John Allman
63. EFF

Public Comment on DGO 10.12 (9/2/26-9/20/26)

	Theme	General Comment Summary	PDD Response
1	Desire for No Drones: Commenters 3, 7, 11, 16, 17, 34, 53, 61	The people of San Francisco do not want SFPD to use drones.	54% of San Francisco voters approved drones as demonstrated by the passage of Proposition E.
2	DGO 10.12 Process: Commenters 4, 5, 8, 10, 13, 20, 23, 31, 32, 34, 40, 41, 45, 49, 53	SFPD should not have drones or a drone program and should not have a DGO for drone use.	State law (California Government Code Sections 7070-7075/AB 481) as well as local law (SF Administrative Code Section 96I/Proposition E) both allow SFPD to use drones. SF Admin Code 96I.2(e)(3) specifically states that the City may not adopt or impose any new restrictions on the use of technology by SFPD unless approved by the Board of Supervisors (BOS). The BOS already approved SFPD’s use of drones, reviews use annually, and may choose to renew it, request modifications, or disapprove the continued use if SFPD does not comply with the standards set forth in the policy. SFPD has complied with the City policy and, as such, the BOS has renewed SFPD’s ability to use drones. SFPD should have a DGO guiding SFPD’s drone usage as that is the most authoritative directive officers have to follow and is what holds officers accountable; without this DGO, SFPD would have no Department-wide policy on drone use.
3		SFPD should reject DGO 10.12 in its entirety and restart the development process. In the meantime, drones should not be used at all or only be used with an emergency court order within a week. SFPD should consider other jurisdictions’ policies and data in its revision.	SFPD has used drones for two years with guidance for specific units only. DGO 3.01 Written Directives outlines the policy development process which was followed to develop DGO 10.12. The development of the proposed draft took over one calendar year and included feedback from the Department of Police Accountability, members of the public and Department employees and leadership. There is no articulable reason to restart the development process at this point, and the development would not stop the usage of drones. City law allows SFPD’s use of drones. If SFPD limited use to emergency court order only, the tool would be rendered useless.
4		SFPD should have a Working Group that solicits community feedback.	Working Groups are effective when addressing policies and procedures that are not strictly tethered to laws. Community cannot change laws through Department policy, but can have an impact on public policy (ordinances/ballot measures or resolutions) at the Board level. The Department did not seek the Police Commission’s approval for a Working Group on this DGO because it is tethered to FAA regulations, voter approved ballot measures, state law, and annual approval by the Board of Supervisors, including annual community meetings (California Government Code Sections 7070-7075). The Police Commission’s function is to hold public hearings, which they do three times a month. This is the mechanism set in place by the SF Charter for members of the public to voice opinions relating to Department policy or process.
5	DGO Scope: Commenters 7, 10, 12, 14, 18, 20, 26, 27, 29, 30, 32, 35, 37, 39, 40, 46, 59, 62, 63	SFPD should have a highly specific DGO dictating rules for drone usage, including zooming rules. Vague guidelines allow officers to make judgment calls which they should not be able to do.	Department General Orders (DGOs) as noted in the name, are intended to remain general in nature, as overly detailed General Orders can inadvertently create conditions that lead to delays in public safety, variations in service quality, and increased risk of field-level mistakes. Overly specific procedures live in separate written directives like Bureau Orders, Unit Orders, Department Manuals, or Department Notices. Officers should absolutely be able to make judgement calls in line with policy and their experience while performing their duty.
6		SFPD should focus on organizational changes.	Organizational changes are outside the scope of DGO 10.12. DGO 1.01, Organizational Structure, outlines SFPD’s structure.
7		SFPD should list all drone operators in DGO 10.12.	Specific administrative topics, including a list of all SFPD UAS operators, do not belong in a DGO. Day-to-day operations, such as personnel assignments, are not under the scope of a DGO. The list of operators may expand or decrease as operational needs and resources change and, as such, will not be added to this policy.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

8	Officer Discipline: Commenters 1, 5, 13, 26, 27, 30, 35, 57, 59, 62	DGO 10.12 has no measures to hold SFPD or its officers accountable and prevent misconduct from occurring. Therefore, DGO 10.12 should list severe consequences for violating DGO 10.12.	All SFPD officers are held accountable to SFPD DGOs and if officers do not adhere to the Department's DGOs, they are subject to discipline. Discipline is not specific to only drone usage and therefore is outlined in other SFPD policy, including other DGOs and Manuals.
9	Lack of Oversight: Commenters 5, 6, 9, 13, 14, 16, 22, 36, 38, 39, 41, 42, 43, 48, 53, 57, 58	SFPD has no oversight so an independent body or task force should be put into place to verify SFPD's compliance with DGO 10.12.	Per the SF Charter, the Police Commission and the Department of Police Accountability serve as oversight bodies and California Gov Code 7070 names the Board of Supervisors as the oversight body related to the UAV use policy ordinance for tools like drones.
10	Drone Acquisition Process: Commenters 1, 2, 3, 5, 7, 8, 9, 10, 13, 14, 15, 18, 19, 20, 21, 23, 28, 38, 40, 41, 45, 46, 48, 53, 57, 62	SFPD's drone usage is completely unregulated, avoiding all democratic processes and hastily adopting policy. Also, DGO 10.12 unlawfully expands SFPD's drone usage.	In 2023, when drones still fell under SF Admin Code 19B ("19B"), SFPD followed the public policy process for drones as set forth in that code. This meant seeking feedback from the Privacy Surveillance Advisory Board and the Committee on Information Technology (COIT). Both held public meetings to review SFPD's drone policy proposal. In 2024, SF elections ushered voter approval for SFPD to use drones, removing drone usage from the 19B public policy development process. In addition, Government Code 7070-7075 requires all California law enforcement agencies go through a public policy process to acquire and use certain tools as defined in the code, including drones. SFPD went through that public process and holds annual community meetings, as required by the code. Two drone community meetings relating to the annual report were held in February of this year. DGO 10.12, like all DGOs, are required to be heard at a public hearing through the Police Commission. At no point in the Department policy proposal does the Department seek an expansion of drone use. The Department seeks to have a comprehensive policy that is applicable and easily understood by members of the Department that are responsible for the use of drones in verbiage and in a delivery system.
11		SFPD should ban facial recognition.	The use of facial recognition by all City agencies has been prohibited in San Francisco since 2019.
12		Members of the public had no idea that SFPD used drones and are upset that SFPD is making unilateral decisions about its drone usage with this forum being the first time SFPD is soliciting any public comment.	SFPD's drone usage has been widely noticed by media outlets and the public for two years. None of the decisions made about SFPD's drone use have been unilateral or siloed; FAA, California state law, San Francisco local law (as passed by San Franciscan voters on the 2024 ballot), the entire acquisition process through COIT and the Board of Supervisors, and Police Commission, have all been public forums. DGO 10.12 was also publicly posted for 30 business days during the policy development process to solicit public feedback. DGO 10.12 was also posted for 10 business days before being initially calendared to be heard by the Commission in June and again in September 2026. Fortunately for SF, the criminal element is very aware of the SFPD's drone usage which has served as a crime deterrent as seen in recent crime stats.
13		The Board of Supervisors did not follow Government Code Sections 7070-7075.	The Board of Supervisors (BOS) is the governing body of the City and County of SF and must follow all applicable laws and processes. PDD suggest that this commenter bring this concern to the BOS or the City Attorney's Office. This is outside the scope of the Department and the Police Commission.
14	Drone Outcomes: Commenters 6, 53, 55, 59, 60	SFPD should not use drones but should instead focus on faster 911 response times and case clearance rates.	SFPD drone usage allows for faster and more measured response times and higher case clearance rates. Drones are a force multiplier which allows SFPD to do more with fewer officers. Technology and easy to follow policies serve as a recruitment tool not only for new officers but also lateral officers. More officers and the use of technology means faster response times.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

15		SFPD should not use drones but should instead work on backlogged cases, more communication with individuals on case follow-up, and having more officers on the street in general.	The Department is still understaffed and agrees that working on backlogged cases and communication is critical. However, this is not a situation where the Department must choose between drones and case follow up. Drones relate to the Field Operations Bureau while investigations relate to the Investigations Bureau. PDD agrees that the Investigations Bureau should have more staff and resources to assist in their duties, but the use of drones is not a factor impeding those efforts. Drones, technology, and clear policies do help with recruitment efforts which build staffing numbers for the Department and can eventually help the Investigations Bureau with staffing issues.
16	General Surveillance/Authorized Uses: 1, 6, 8, 13, 16, 18, 21, 24, 25, 26, 27, 28, 29, 31, 32, 35, 36, 37, 38, 39, 41, 43, 44, 45, 46, 47, 48, 49, 50, 51, 53, 54, 55, 56, 61, 62, 63	SFPD should ban general surveillance.	DGO 10.12.04(C)(8) states, “[UASs shall not be used] for general surveillance, as defined in this policy.”
17		SFPD should not use drones to monitor everyone all the time and should ban mass surveillance.	DGO 10.12 prohibits SFPD from using drones for general surveillance (see 10.12.04(C)(8)) and DGO 10.12.04(B)(1) states, “Except as listed in section 10.12.04(C), UAVs may be deployed for a public safety response, to assist in an active criminal investigation, or during training.” Mass surveillance is not a public safety response.
18		The language “with no stated purpose” in the definition of General Surveillance in DGO 10.12 would allow officers to deploy drones for any stated purpose, even if it is not related to a specific criminal incident.	This is incorrect; if an officer has a stated purpose, that officer must adhere to the Authorized Uses as outlined in DGO 10.12.04(B)(1): “Except as listed in section 10.12.04(C), UAVs may be deployed for a public safety response, to assist in an active criminal investigation, or during training.” The prohibitions are as follows: For any manner prohibited by law; For the purpose of harassing, intimidating, or discriminating against any individual or group; To monitor individuals based on legally protected classes such as race, gender, religion, or sexual orientation; Solely for the purpose of monitoring activities protected by the U.S. Constitution, such as the First Amendment’s protections of religion, speech, press, assembly, and redress of grievances (e.g., protests, demonstrations); For conducting personal business of any type; In an unsafe manner or in violation of FAA regulations; As a force option, or; For General Surveillance, as defined in this policy."
19		SFPD should ban “general drone patrol”, “routine drone patrol”, and “aerial overwatch”. SFPD should only authorize drone use for incident-driven deployment as incident-driven deployment has limits on where the drone flies, what it observes, and when the mission ends. SFPD should not allow aerial observation for public safety responses.	DGO 10.12 does not use the terms “general drone patrol”, “routine drone patrol”, or “aerial overwatch”. However, as approved by the Board of Supervisors (the governing body per California Government Code Sections 7070-7075/Assembly Bill 481), SFPD is authorized to use drones to assist patrol. The Department is not using drones to patrol autonomous flight paths, as there is always a pilot assigned, and the drones and members must adhere to the authorized uses in the policy. The FAA maintains authority over the limits of drone flights (heights, altitudes, speeds, etc.). Incident-based response in law enforcement is the basis of a Drones as a First Response (DFR) program where drones launch automatically in response to 911 calls and would require a constant perimeter overwatch to be effective. Law enforcement's understanding of the term "incident-based response" as it relates to drones may not be the same as this commenter's intent.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

20		SFPD only limits the authorized use of drones to “in any situation in which a member may be deployed” and should add the limit that authorized drone uses must be to respond to public safety. Public safety includes rapes, murders, vehicle pursuits, active investigations, ongoing robberies, burglaries, searches and rescues, violent crimes. Public safety does not include property theft, shoplifting, pickpocketing, stealing vehicles, harassment or threats, indent exposure, traffic stops, or wellbeing checks.	DGO 10.12.04(B)(1) states, “Except as listed in section 10.12.04(C), UAVs may be deployed for a public safety response, to assist in an active criminal investigation, or during training.” Public Safety is not defined only as nine categories or subjectively removes other crime categories. If public safety fit neatly into nine categories only, there would be no need for Ca. Penal Code, Vehicle Code, Evidence Code, or Municipal Code books that are thousands of pages long or an intricate criminal justice system. The District Attorney, Department of Emergency Management, the Fire Department, and the Sheriff’s Department would also take issue with public safety being so narrowly defined by this member of the public. Unfortunately, crime and other public safety issues impact the City and all who live or visit SF daily and SFPD cannot ignore categories or incidents that are not included in the list provided by this commenter. There is always a potential for violent activity to occur (i.e., stealing cars turns into a gunpoint carjacking, verbal harassment turns into assault or stalking, indecent exposure turns into pedophilia or sexual assault, etc.) during what initially was called in as a minor offense. Under the Flight Logs on SFPD’s website, drones' usages have included suicide attempts, assaults, person with a gun, stabbings, etc. Unfortunately for this commenter, a philosophical discussion about what should be considered public safety cannot be resolved through this policy.
21		SFPD should clearly list out every public safety response a drone could be deployed for, should only allow drones to be deployed for specific law-enforcement incidents, and should define what a “public safety response” is.	Policy cannot predict every potential criminal or public safety incident that officers and drones could encounter. The policy team is always concerned with inadvertently creating a policy limitation that puts the safety of the public or officers at risk. DGO 10.12.04(B)(1) states, “Except as listed in section 10.12.04(C), UAVs may be deployed for a public safety response, to assist in an active criminal investigation, or during training.” Public safety response has a wide range of incidents including active shooters assisting a dog stuck on a Fort Funston cliff side. As this term is common to law enforcement and this is a law enforcement policy, PDD does not agree that “public safety” needs to be defined. If the Police Commission does require a definition, PDD suggests adding it to DGO 3.02, Terms and Definitions instead of this DGO.
22		SFPD should only respond to and investigate crimes once they have been committed and not predict when crime will happen or actively find crimes to respond to.	SFPD is not using drones as a predictive policing tool. It is a tool that assists officers, provides situational awareness, and objective video evidence when needed.
23	Permissive Language: Commenters 12, 37, 44, 46, 47, 54, 63	The use of the terms “consider” and “reasonable” in DGO 10.12.04(A)(1) which states, "All UAS operations shall consider the protection of individual civil rights and the reasonable expectation of privacy as a key component in any decision made to deploy a UAV and shall comply with the BOS-approved Law Enforcement Equipment Use Policy," give SFPD officers the discretion to make decisions and should be replaced with harsher terms such as “shall” and “may”.	DGO 10.12.04(A)(1) does include the term “shall”. As the term "shall" in SFPD policy means "required" or "must", SFPD officers are still required to consider individuals' expectation of privacy during these circumstances. In some exigent circumstances, the need to protect the public may temporarily supersede individual privacy expectations. Individuals' expectations to privacy does not have a legally concrete definition.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

24		SFPD should not allow for inadvertent drone recordings and the language “reasonable precautions” in DGO 10.12.04(A)(2) which states, "UAS operators shall take reasonable precautions to avoid inadvertently recording or transmitting images of areas where there is a reasonable expectation of privacy, unless authorized by law," is too lenient.	The term "inadvertently" means "doing something without intention, by accident, or without realizing", meaning if an officer were to inadvertently record an area where there is a reasonable expectation of privacy, it would not be a purposeful choice. Therefore, what SFPD officers can do is "take reasonable precautions" to avoid doing this. Again, the use of the term "shall" means "required" or "must".
25	First Amendment: Commenters 1, 2, 8, 10, 17, 19, 25, 26, 27, 28, 29, 30, 31, 32, 35, 36, 37, 38, 39, 40, 42, 43, 44, 45, 46, 47, 48, 52, 54, 58, 61, 62	SFPD should not use drones to monitor, identify, record, or track people engaged in First Amendment activity as that is a protected right vital to democracy and community advocacy. Although the criminal conduct of one person at a First Amendment activity may justify drone use, SFPD should use drones to target that specific conduct and not other participants.	Drones should not be used to monitor, identify, record, or track people engaged in First Amendment activity which is why DGO 10.12.04(C)(4) states, “[UASs shall not be used] solely for the purpose of monitoring activities protected by the U.S. Constitution, such as the First Amendment’s protections of religion, speech, press, assembly, and redress of grievances (e.g., protests, demonstrations).” That, in partnership with the other prohibitions, ensures monitoring, harassing, intimidating or discriminating against individuals or groups will not be tolerated.
26		The use of the term “solely” in DGO 10.12 is not strong enough to ban all drone use at First Amendment activities.	SFPD must be allowed to respond if a crime were to be committed during a First Amendment activity. SFPD, as a law enforcement agency, has a duty to respond and protect the safety of the participants and the public, while still protecting participants’ rights to assemble, or protest, if others are not gathering peacefully.
27		Instead of the language that is currently in DGO 10.12, SFPD should refer to DGO 8.10, Guidelines on First Amendment Activities, that includes restrictions on investigations, recordings, and collection of information at First Amendment events.	DGO 10.12.04(C)(4) should not be removed and replaced with a reference to DGO 8.10, <i>Guidelines to First Amendment Activities</i> , as DGO 8.10 can change and is currently being updated with an adjusted scope.
28		Just because an individual is in a public space, it does not mean that SFPD can surveil them.	Correct. SFPD does not surveil people just because they are in a public space. While current law and case law both state that individuals do not have an expectation to privacy in public spaces, SFPD members must continue to comply with DGOs. This DGO proposal requires members to adhere to the authorized use and prohibitions for drone use which does not include the allowance for general surveillance.
29		SFPD should require a public safety basis for drone deployment at First Amendment activities.	DGO 10.12.04(B)(1) states, “Except as listed in section 10.12.04(C), UAVs may be deployed for a public safety response, to assist in an active criminal investigation, or during training.” The “public safety response” basis is then logged in UAV Operators’ Flight Summary Reports, which are then posted on the SFPD website under Flight Logs for transparency.
30		SFPD should not use drones for the general public’s safety during First Amendment activities. DGO 10.12 discourages people from organizing protests.	The use of drones by SFPD and the language in DGO 10.12.04(C)(4) is what helps to protect the safety of people participating in First Amendment activities and should therefore encourage people to protest safely. Members of the public are not required to notify SFPD when they organize First Amendment activities in SF, but SFPD is required to ensure the safety and ability for the public to mobilize, including street closures, traffic coordination, and addressing criminal behavior that may impact the ability to exercise First Amendment protected activities.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

31	Fourth Amendment: Commenters 2, 14, 19, 26, 27, 28, 29, 30, 35, 36, 37, 38, 45, 47, 53, 54, 58, 62	SFPD should prohibit drones to be used for unreasonable searches and require a search warrant as that is a protected right of the people per the Fourth Amendment.	The US Supreme Court has historically ruled that observations of things visible to the naked eye made from public airspace do not constitute as a search. Law enforcement commonly flies drones at standard heights (approx. 400 feet) and observe visible details which do not require a warrant. A warrant-first requirement would prevent SFPD from using drones in situations where they have proven beneficial and non-controversial, such as dirt bike street takeovers, auto burglaries ("bipping"), locating stabbing suspects, and as an alternative to vehicle pursuits. It would also go beyond what the Fourth Amendment requires. Observing activity in public places does not require a warrant, so SFPD would need a judge's approval to view the same public scene that an officer responding to the incident, or an existing surveillance camera, could lawfully observe without one. Concerns about drone use are better addressed through clear prohibitions or data retention which is already addressed in this policy.
32	Autonomous Drones: Commenters 6, 9, 39, 51	SFPD should prohibit autonomous flying of drones and always have a human pilot.	DGO 10.12.03(A) defines a drone as, "An aircraft with no onboard human pilot, crew, or passengers, controlled remotely or autonomously." PDD understands why this term is misleading as there are no systems currently available to law enforcement that can conduct fully autonomous operations- all missions need a pilot/operator. "Autonomously" refers to internal adjustments the drone may make for specific situations such as weather conditions (adjust to wind) or, if the drone begins to lose battery, for safety purposes, the drone would land itself, etc. There is always a human pilot, required to go through specific training and licensing processes.
33	Vulnerable Communities: Commenters 1, 3, 7, 8, 10, 11, 13, 15, 22, 23, 24, 29, 34, 36, 37, 38, 40, 41, 42, 43, 47, 49, 50, 51, 53, 54, 55, 57, 60, 61	SFPD’s drone policy puts immigrants, homeless, people of color, Muslims, indigenous individuals, Latinos, LGBTQ+ individuals, survivors of gender-based violence, and individuals seeking access to reproductive or gender-affirming care at risk, deteriorating trust between these communities and SFPD.	The SFPD use of drones are to protect San Franciscans, particularly the most vulnerable communities which is why DGO 10.12.04(C)(3) explicitly states, “[UASs shall not be used] to monitor individuals based on legally protected classes such as race, gender, religion, or sexual orientation”. PDD understands general anxieties with any and all surveillance tools given the depictions in TV and Hollywood films about law enforcement or military capabilities. This is, in part, why the prohibitions and definitions appear in this DGO. SFPD has policies relating to immigration enforcement restrictions, bias-free policing, hate crimes, interacting with transgender, gender-variant, and non-binary individuals and participates in many programs assisting the Human Services Agency with homeless individuals, and separately has policies in place protecting Planned Parenthood locations from harassment. SFPD has been flying drones in the City for two years and has no evidence that aligns with this comment, but we acknowledge the concern which is why PDD offered amendments to clearly prohibit general surveillance and why SFPD policy development process includes a Public Review/comment period. Trust is sustained not only in how a policy is written, but also how it is carried out and why flight logs are publicly posted to ensure drone use remains transparent and accountable to the communities SFPD serves.
34		SFPD’s drone program directly supports the wealthy, rich elites of San Francisco and not the public safety of all individuals, perpetuating systemic injustices. SFPD has shown that they do not care about the people they serve with this policy.	SFPD’s drone program protects the public safety of all San Franciscans and visitors to this city.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

35	Harassment/Stalking: Commenters 1, 8, 9, 13, 29, 32, 34, 37, 54, 57, 61	Law enforcement has and will continue to harass and stalk everyday people.	PDD recognizes that there have been cases across the nation of police officers abusing their power or accessing information and we take that concern seriously. Our approach is to assume misuse is possible and build the policy to prevent it, detect it, and hold people accountable when it happens. DGO 10.12.04(C)(2) states that UASs shall not be used “for the purpose of harassing, intimidating, or discriminating against any individual or group.” The policy also defines authorized uses and includes prohibitions that address this concern directly, giving oversight bodies a clear basis to discipline officers who do not comply. Training, audits, and discipline work together to deter and identify misuse, and officers found to be harassing or stalking anyone are acting in violation of policy will be held accountable.
36	Drone Access/Administration: Commenters 3, 25, 26, 27, 29, 30, 35, 37, 39, 42, 46, 48, 49, 54, 59, 62, 63	SFPD should specify the requirements on who has access to drone footage, the purpose for access, and logging of access.	There should be tracking of drone footage access, which is why DGO 10.12.04(E)(2) now states, “UAS footage shall not be accessed by members unless a sworn member holding the rank of Captain or higher has determined that access is necessary for an open criminal investigation, or unless otherwise required by law.” The policy also requires UAS Operators to document each UAS operation for auditing purposes.
37		SFPD should provide guidelines for drone audio, not just video. SFPD should also restrict intentional observation.	SFPD drones do not have audio capabilities. Intentional observation should not be restricted as it would serve as a blanket prohibition of drone use. Drone use is the intentional observation of the authorized uses in the policy.
38		SFPD should have an hour time limit on the length of each drone flight.	There should not be a time limit on each drone flight as PDD cannot predict the length of every call for service. Drones do have battery limits and must be switched out if needed. But, for transparency, members of the public can see how long every drone flight is on the SFPD website.
39		SFPD should require logging of every drone flight and its purpose, including a free-form text box for a written description.	There should be logging of every drone flight, which has been made public since May 2024. Flight logs are available on the SFPD website. The proposed policy does require UAS Operators to document the use of the drone, but including a required free form text box for reporting does not fall within the scope of a DGO.
40	Retention: Commenters 1, 2, 8, 13, 25, 26, 27, 28, 29, 30, 32, 35, 36, 37, 38, 42, 43, 45, 46, 47, 48, 49, 54, 59, 62, 63	SFPD should close loopholes in drone data retention, including how long footage can be kept for. SFPD should clarify in DGO 10.12 what the drone footage’s post-evidentiary use is for.	DGO 10.12.03 states, “Pursuant to SF Administrative Code Section 96I.2, the Department must not retain any public footage for longer than 30 days unless a sworn member holding the rank of Captain or higher has determined a longer retention period due to an open criminal investigation” and DGO 10.12.04(E)(1) states, “UAS recordings relevant to criminal, civil, or administrative manner shall be retained for a minimum of two (2) years, in accordance with laws governing evidence, or upon order of the Court.” Both these sections specify how long public and evidentiary footage may be kept for. Additionally, DGO 10.12.03 specifies that the purpose of drone footage being kept past the 30 days is for an open criminal investigation.
41		SFPD should only keep relevant footage and delete all other footage of people and places unrelated to an investigation (including footage captured in transit to and from a scene) within 24 hours.	Only drone footage that has evidentiary value should be retained which is why DGO 10.12.03 states, “Pursuant to SF Administrative Code Section 96I.2, the Department must not retain any public footage for longer than 30 days unless a sworn member holding the rank of Captain or higher has determined a longer retention period due to an open criminal investigation.” SF Administrative Code Section 96I.2 dictates the length in which SFPD can retain public footage for; changing the 30-day requirement to only 24 hours is operationally not feasible as this would require designated staff with the authority to review hours of footage immediately and then chain of command approval as well as the investigations lead approval. SFPD does not have the resources to turn footage around that quickly.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

42	Drone Sharing: Commenters 1, 2, 3, 5, 6, 8, 9, 11, 12, 13, 14, 15, 17, 18, 25, 26, 27, 28, 29, 30, 31, 32, 36, 37, 38, 42, 46, 47, 48, 51, 53, 54, 58, 61, 62, 63	SFPD should not be trusted with drones as demonstrated from SFPD’s 6-month leak of drone footage, which proves SFPD racially profiles individuals.	The exposure of drone footage earlier this year was a failure, and while the reported timeline varies (Hoodline reported that feeds were accessible for at least two days in June, and researchers archived roughly 48 hours of footage), we understand why it has affected trust. It also raised fair questions about how drones are being used, including how often uninvolved people are being recorded. We take those questions seriously, and DGO 10.12 is part of how we're responding. The policy prohibits using drones to harass, intimidate, or discriminate against any individual or group, requires operators to minimize recording of people unconnected to an incident, and includes required documentation of operations, public reporting and audit provisions so the Commission and the public can review how and where drones are deployed. We know trust has to be earned through how the policy is carried out, not just how it's written.
43		Footage and data should never be accessed by third parties, politicians, or agents.	Public Safety partners, prosecutors, defense attorneys, courts, public information requests, and DPA investigations remain as third parties SFPD will shares with. Footage will not be shared for federal immigration enforcement, consistent with the California Values Act and San Francisco's sanctuary ordinance, and elected officials do not have access outside formal legal processes. Footage with no evidentiary value is deleted within 30 days.
44		There should be strict rules about when drone footage may be shared with other agencies. In particular, there should be no sharing of footage or data with any federal agencies. And, drone footage and data should only be shared when the recipient has the same or more protections as SFPD regarding use, access, retention, deletion, and further sharing. Lastly, there should be oversight on data sharing.	There should be strict rules about sharing drone footage which is why DGO 10.12.04(E)(3) states, “Footage collected during UAS operations may be shared by the Program Manager with law enforcement partners for law enforcement purposes. The Program Manager will forward all other requests to the Legal Division to manage.”
45	Drone Contract/ICE: Commenters 3, 9, 11, 12, 13, 15, 16, 17, 18, 23, 29, 31, 32, 33, 34, 37, 38, 46, 47, 48, 51, 53, 54, 58, 61	People are scared of being surveilled by SFPD drones and then being targeted by ICE as a result. Sharing data with ICE goes against the City’s own Sanctuary Ordinance.	SFPD does not work with or share drone footage with ICE or CPB for the expressed or implied purposes of immigration enforcement as prohibited by DGO 5.15, <i>Enforcement of Immigration Laws</i> , and San Francisco Administrative Codes Section 12 H and 12I.
46		SFPD should not contract with Skydio as they work with and profit off groups that are committing genocide such as ICE/CPB, the Israeli Defense Force, and Armed Forces of the Philippines.	The Office of Contract Administration sets the rules for contracting in the City.
47		It seems impossible for SFPD to ensure that drone footage is not accessible to ICE as ICE has access to data stored in Peregrine.	The Department is actively working on a Department Notice for Peregrine that includes restricted data sharing. Data sharing restrictions also already appear in the contract with Peregrine.
48	Reporting: Commenters 22, 38, 46, 48, 49, 53, 57, 59, 63	SFPD’s DGO 10.12 has no transparency measures including reviews of SFPD’s drone use.	DGO 10.12 does have any transparency measures as DGO 10.12.05 states, “Annual reporting shall be governed by CA Gov Code Section 7072. Reports shall be publicly posted on the Department website and a copy will be forwarded to the Police Commission.” Drone flight logs have been publicly posted starting May 2024 to date. Gov. Code 7070-7075 also requires annual community meetings.

Public Comment on DGO 10.12 (9/2/26-9/20/26)

49		SFPD’s drone use should be reviewed annually by a third party and this review should result in added drone use restrictions.	DGO 10.12.05 states, “Annual reporting shall be governed by CA Gov Code Section 7072. Reports shall be publicly posted on the Department website and a copy will be forwarded to the Police Commission.” This means that the Board of Supervisors (BOS) reviews use on an annual basis per state law. Government Code allows the BOS to restrict use if they find that SFPD did not comply with policy.
50	Technology Standards: Commenters 32, 35, 36, 49, 50	SFPD should have clearly written policy regarding its technology use, including digital security practices and how drone footage is securely stored.	<u>SFPD uses San Francisco City’s technology guidelines for its use of technology. Additionally, the SFPD is actively drafting a data management DGO to reinforce those guidelines. Therefore, technology security guidelines do not live in DGO 10.12 as they are not specific to only drones.</u>
51	Other Technology: Commenters 1, 3, 7, 8, 15, 18, 31, 32, 41, 47, 48, 55, 57, 61, 63	DGO 10.12 does not address concerns about FLOCK cameras, including that FLOCK cameras track random civilians 24 hours a day.	DGO 10.12, <i>Unmanned Aircraft Systems (UAS) Operations</i> , does not speak to FLOCK cameras as FLOCK cameras are Automated License Plate Readers (ALPRs) which is a separate technology under different governing statutes. ALPRs fall under SF Admin Code 19B and as such follow the approved ALPR policy which can be found on the SFPD website. If ever there is a time where drones could evolve to capture ALPR, the approved ALPR policy would be applicable.
52		FLOCK cameras, AI, and Waymos scary technological tools just like drones are.	This comment is more of a general concern rather than a specific policy request. We understand that new technologies, including license plate readers, AI tools, and autonomous vehicles, raise real concerns about surveillance. Each of these is governed by its own approval and oversight process. The Department's use of license plate readers is governed by a surveillance technology policy approved through the City's Administrative Code Chapter 19B process, and the Department's use of AI is subject to Citywide guidelines on how city agencies may use these tools. San Francisco law also prohibits the Department from using facial recognition technology. For drones specifically, DGO 10.12 limits use and has clear prohibitions.
53	Outside SFPD Jurisdiction: Commenters 34, 50, 51, 55, 56, 57, 58, 60	SFPD should spend the money they are spending on their drone program to fund legal aid for immigrants, affordable housing, mental health services, social services, public transportation, homeless services, poverty services, health treatment, more jobs, fixed streetlights, and an end to the drug crisis. SFPD should invest in income support systems, social benefit systems, and universal healthcare as these prevent crime.	SFPD's responsibilities are to "preserve the public peace, prevent and detect crime, and protect the rights of persons and property by enforcing the laws of the United States, the State of California, and the City and County" as per SF Charter 4.127. Other City agencies work towards addressing these needs: Department of Public Health, Homeless and Supportive Housing, Immigrant Services and Resources, Municipal Transportation Agency, etc. Therefore, SFPD does not use funds allocated to its operations to another City agency but agrees that our Department relies on partnerships with other city agencies to address variables that contribute to criminal activity.
54		The Mayor of San Francisco has reduced or cut the budgets of many social services organizations and agencies as well as layoffs. Spend San Franciscan tax dollars on these services instead.	SFPD is a city agency and is not responsible for the City budget. SFPD does not have control over social services getting funding or layoffs.