CCSF CITY EMPLOYEE DRONE POLICY (DRAFT)

The following Drone Policy is hereby adopted by the City and County of San Francisco's Committee on Information and Technology (COIT), and will apply to all City employees and City contractors.

PURPOSE AND SCOPE

The City is dedicated to embracing technologies that help improve its services while protecting the privacy and safety of its residents. The use of drones in the public interest is expected to benefit residents and visitors to the City through the more efficient use of City resources. The term **"drone"** means an unmanned aircraft flown by a pilot via a ground control system, or autonomously through use of an on-board computer, communication links or other any additional equipment.

This Policy will be subject to a one-year evaluation period. After the evaluation period, a Drone Oversight Committee composed of representatives from the Mayor's Office, the City Administrator, and COIT will review drone use and provide recommendations on the formal adoption of a City Drone Policy.

This Policy applies to all information resources operated by or for the City and its component departments, boards, and commissions. Elected officials, employees, consultants, volunteers, and vendors while working on behalf of the City are required to comply with this Policy.

POLICY STATEMENT

The City's Drone Policy requires each department wishing to use drones to issue a department policy describing the authorized uses. Department policies must prioritize the privacy and safety of residents, businesses, and visitors.

Department policies must be consistent with this Policy and must comply with all City, State, and Federal laws and regulations, and with all state and federal Constitutional guarantees. To review Federal Aviation Authority (FAA) requirements for the registration and use of drones by the City, please refer to: https://www.faa.gov/uas/

The following list provides a brief overview of the Departments authorized to use drones. A full description of each department's drone program is available on SF Open Data.

Department	*Authorized Use*
Controller's Office	– *Disaster Response & Recover*: Aerial review of areas affected by disasters or emergencies.
Fire Department	– *Disaster Response*: Assessment and District Surveys – *Emergency Response*: Building Fire Reconnaissance – *Search & Rescue*: Aerial or water borne drones. – *Training*: Assessment and evaluation of emergency response operations.
Public Utilities	– *Construction Management*: Inspection of project sites for contract and environmental compliance. – *Environmental Monitoring & Documentation*: Vegetation type and health, wildlife, streams/reservoirs. – *Inspections*: Surveys and assessments of SFPUC properties and assets. – *Security*: Overflights and boundary patrols of SFPUC properties and assets.
Port	– *Disaster Response & Recovery*: Inspections during and after a disaster. – *Inspections*: Surveys and assessments of Port properties. – *Marketing*: Capture video and still photographs. – *Security*: Overflights and boundary patrols of Port properties and assets.
Recreation & Parks	– *Construction Management*: Inspection of SFRPD project sites for contract and environmental compliance. – *Disaster Response & Recovery*: Inspection of properties, facilities, and assets during and after disasters. – *Environmental Monitoring*: Flora and fauna type and health, spills and leaks, erosion. – *Event Management*: Monitor large events to document pre/post event conditions, and event operations. – *Inspections*: Surveys and assessments of SFRPD properties, facilities, and assets. – *Mapping*: Digital elevation models, land use maps, 3D models, contours. – *Marketing*: Capture videos and still photographs. – *Search & Rescue*: Reconnaissance and assist during an emergency, both for water and land operations. – *Security*: Overflights and boundary patrols of SFRPD properties and assets.

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POLICY REQUIREMENTS

Each department's drone policy must also include the following elements:

Specifications: Each City drone must have a global positioning system. The software and/or firmware used to operate the drone must be up to date and maintained.

Safety: Drones must be operated in a safe manner. City drones should not be operated carelessly or recklessly that could cause personal injury or property damage. Drones may not have features (e.g., lights, coloring) or be used in a way that distracts drivers or other aircraft.

Drones that lose GPS signals should be set to hover in place. Additionally, drones that lose signals to their remote operator or when low power is detected should be set to return to home/origin.

Training: Drone operators must obtain remote pilot certifications from the FAA and must comply with all other FAA requirements.

All City drone operators and any City staff with access to raw drone data that may contain "Personal Identifiable Information" must review and sign a copy of the City's drone policy.

Notification: Departments must notify the public of intended drone operations at the site of operations through signage in readily viewable public areas. In addition, Departments must notify the public of all drone flights by publishing flight summary data on the Open Data portal 24 hours in advance of operations. Department notifications must include flight summary information and the type of data to be collected (See Appendix A for the City's Flight Summary Form).

NOTE: Pre-notification is not required when drones are used for emergency or security authorized uses. In those situations, flight summary information must be submitted within 48 hours after the operation.

Prohibited Zones: Drones may not be used within five miles of an airport or in any FAA no-fly zone unless approved. City drone operations must comply with FAA rules.

Drones may not hover over trolley, streetcar, or light rail line wires, above rail, bus and parking control facility yards, unless authorized by the SFMTA.

Drones are not authorized within 500 feet of historical landmarks without authorization from building management or owners. San Francisco historical landmarks are defined by Article 10 of San Francisco's Planning Code. (e.g. City Hall, the Ferry Building. A full list is available here: http://sf-planning.org/sites/default/files/FileCenter/Documents/5081-PresBulletin09LANDMARKS_revMAR2015.pdf)

Drones may not fly over Port properties subject to the Maritime Transportation Security Act of 2002 without the permission of the Port and/or terminal operator. Port officials will provide City agencies with a list of regulated maritime facilities.

Privacy: Departments shall collect information using a drone, or use drone-collected information, only to the extent that such collection or use is pursuant to an authorized purpose. Should information be incidentally collected that could be used to identify persons or private information, Departments must remove all personal identifiable information from raw data footage.

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Data Security:	Departments are advised not to maintain archives of raw, unprocessed drone data once the business purpose is accomplished. To the extent departments do retain drone-collected data, Departments must restrict access to the raw drone footage to staff with authorized access. Distribution of raw drone data is restricted to authorized departments for the purpose of cleansing and processing data only. In all other circumstances, the City may not exchange raw, unprocessed drone-collected data between departments or disclose such data to the public except for exigent public safety needs or as required by law. In instances where a Department's data retention policy does not explicitly cover information collected by a drone, departments may store raw data up to a maximum of one year. Exceptions to this standard must be supported with documentation and a clear rationale, and maintained by department staff to be reviewed by COIT and the Drone Oversight Committee.
Compliance:	All City drone operators must submit flight information to the Open Data portal here: https://sfgov1.sharepoint.com/sites/ADM-Drone/SitePages/Home.aspx

DEFINITIONS

Personal Identifiable Information:	Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.
Raw Drone Data:	Information collected by a City drone that has not been processed and cleaned of all personal identifiable information. The distribution and use of raw drone data is tightly restricted.

REFERENCE

The FAA has developed regulations on the use of drones. For more information, please refer to their website at: https://www.faa.gov/uas/

AUTHORIZATION

SEC. 22A.3 of the City's Administrative Code states, "COIT shall review and approve the recommendations of the City CIO for information communication technology (ICT) standards, policies and procedures to enable successful development, operation, maintenance, and support of the City's ICT."

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Appendix A: CCSF Drone Reporting Forms

CCSF Drone Policy - Department Authorized Uses

Drone Descriptive Title (max 50 characters)	
Department:	

In the following section, please fill out this form and the following questions for EACH PROPOSED AUTHORIZED USE.

-- AUTHORIZED USE CASE

Please describe the specific operation how your department will use drones. *Please focus your answer on the operational details – who will use drones and for what purpose.*
In what locations will you use drones? *Please provide specific details on anticipated locations. Within the City, please describe typical flight locations (e.g. neighborhoods, parks, etc..). Outside the City, please list the counties where flights will be conducted.*
In a given month, how frequently do you anticipate using drones?
Please describe how your department will use data to support a clear business objective.
What are all the types of data drones will collect? *Please list all types of data any drone might collect, including data collected for a specific business purpose and any other data your drones will collect as part of normal operations.*
In any scenario, will personal identifiable information be collected?
What privacy risks do you anticipate by using drones?

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Please provide additional details on your data policies regarding information collected by drones:			
Please identify your business practices for the type of data collected	Type of Data	Data Retention Policy *Please cite the location for your policy and authorization source.*	Please describe business process to protect privacy and filter out un-needed data.
Business Use Data *This data is intentionally collected to support a specific operations*			
All Other Data *Please identify and describe your practices to for unintended data.*			
At the end of the one-year evaluation period, COIT will conduct a Return-on-Investment analysis on the City's use of drones.			
How will your department evaluate impact drone data will have in improving your business? Please be specific.			
What alternative options are available instead of using drones?			

Save & Close Submit

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Flight Summary Form

Department *

Authorized Use new *

Drone Make & Model *

FAA provided drone registration number *

Street Address (Area Surveyed)

Please enter the address with the full number, name and type, for example: 1 South Van Ness Avenue

FAA provided commercial pilot certificate number *

City (Area Surveyed)

County (Area Surveyed) * San Francisco

Zip Code (Area Surveyed)

Location

Specify location Or Use my location

Location data will be sent to Bing Maps. Learn More

Start Time * 12 AM 00

End Time * 12 AM 00

Type of Data Collected *

- ☐ Images
- ☐ Video
- ☐ Sound
- ☐ Infrared
- ☐ LIDAR
- ☐ Specify your own value:

Privacy Risks *

Please summarize privacy risks associated with this flight.

Privacy Risks - Mitigation *

What actions will be taken to mitigate privacy risks?