



CITY COUNCIL STAFF REPORT

TO: Honorable Mayor and City Council **DATE:** June 13, 2022

FROM: Matthew Bronson, City Manager

PREPARED BY: Jim Munro, Commander
John Peters, Chief of Police

SUBJECT: Resolution Authorizing the Purchase of Additional Unmanned Aerial Systems (Drones), Accepting a Donation of a Remote-Controlled Robot, and Updating the Police Department's Military Equipment Policy as Required by AB 481

RECOMMENDATION

Adopt the Resolution Authorizing the Purchase of Additional Unmanned Aerial Systems (Drones), Accepting a Donation of a Remote-Controlled Robot, and Updating the Police Department's Military Equipment Policy as required by AB 481

BACKGROUND

Assembly Bill 481 (AB 481), codified in Government Code sections 7070 through 7075 requires a law enforcement agency to obtain approval from their governing body, via adoption of a "military equipment" use policy by ordinance, prior to the agency funding, acquiring, or using military equipment. The Grover Beach Police Department seeks to purchase several new unmanned aerial systems (hereafter referred to as "drones") and receive a donation of a ground robot to enhance officer and community safety. Though these items are publicly available to be purchased by anyone, AB 481 considers them "military equipment" if used by law enforcement.

On March 14, 2022, the City Council enacted Ordinance 22-01, approving the Police Department's Military Equipment Policy #707. Staff has drafted amendments to the equipment listed in the policy and to include adding new drones the Police Department intends to purchase with existing funding in this current fiscal year FY 2021-22 and removing two pieces of equipment that were recently donated to other agencies. The additional drones meet different operational needs of the Police Department including crime scene/accident mapping, interior building searches, large-area searches, fireworks enforcement, and night-time searches. With these requested purchases, the Police Department will have a total of 12 drones with 7 certified FAA-certified drone pilots.

Additionally, staff is seeking Council acceptance of a donation of a remote-controlled ground robot (\$25,500 value) that will assist officers in searching buildings and communicating with barricaded persons. Acquiring this equipment is an innovative approach to help keep our officers and community safe through the use of technology. This donation is from a local business with locations in other communities and thus similar donations are being offered to other law enforcement agencies in the region.

As a summary, staff requests authorization to purchase the following equipment:

1. DJI Matrice 30T Combo

- a. Cost: \$14,000
- b. Quantity: 1
- c. Description: UAS that has color and infrared recording camera. Flight time is approximately 45 minutes. Primary use will be large outdoor searches and SWAT operations.

2. Brinc Lemur Tactical UAS

- a. Cost: \$8,999
- b. Quantity: 1
- c. Description: UAS that has color and infrared recording capabilities. Unit is capable of breaking windows, two-way communications, and is ideal for indoor searches.

3. Autel EVO II V2 Pro 6k UAS

- a. Cost: \$2,700
- b. Quantity: 1
- c. Description: UAS with color recording camera, measuring software and approximately 40 minutes of flight time. Primary use will be crime scene and accident scene reconstruction.

4. DJI Mavic Mini 3

- a. Cost: \$500 each
- b. Quantity: 5
- c. Description: Miniature UAS that can record video with approximately 25 minutes of flight time. Primary use is for patrol officers to assist in building searches at burglary alarms.

Staff also requests the authorization to receive a community donation of the following equipment:

1. Transcend Robotics Vantage Model

- a. Cost: No cost. (\$25,500 value)
- b. Quantity: 1
- c. Description: Radio controlled ground robot with a camera used to search for and communicate with dangerous suspects.

Pending Council approval of the above items, staff recommends the updating of equipment listed in the current AB 481 policy. Two items that were recently removed from the Police Department inventory were the 1994 Chevrolet Mobile Command Vehicle and the Mobile Military Kitchen. Both of these items were donated to other agencies for their use and thus staff recommends the removal of these items from the AB 481 list. Staff also recommends adding language to the policy that allows for the replenishment and replacement of previously approved equipment that may have been expended or no longer in serviceable condition.

FISCAL IMPACT

The total purchase cost of the drones is \$28,199 which will be funded in the existing operating budget for FY 2021-22. The remote-controlled robot would be donated and there is no fiscal impact on receiving the equipment.

ALTERNATIVES

The Council has the following alternatives to consider:

1. Adopt the Resolution Authorizing the Purchase of Additional Unmanned Aerial Systems (Drones), Accepting a Donation of a Remote-Controlled Robot, and Updating the Police Department's Military Equipment Policy as required by AB 481; or
2. Modify the Resolution and equipment acquisitions; or
3. Provide alternative direction to staff.

PUBLIC NOTIFICATION

The agenda was posted in accordance with the Brown Act.

Attachments

1. Resolution No. 22-XX.
2. Draft Amended Police Department Military Equipment Policy.

RESOLUTION NO. 22-

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GROVER BEACH, CALIFORNIA, AUTHORIZING THE PURCHASE OF ADDITIONAL UNMANNED AERIAL SYSTEMS (DRONES), ACCEPTING A DONATION OF A REMOTE-CONTROLLED ROBOT, AND UPDATING THE POLICE DEPARTMENT’S MILITARY EQUIPMENT POLICY AS REQUIRED BY AB 481

WHEREAS, Assembly Bill 481 (AB 481), codified in Government Code sections 7070 through 7075 requires a law enforcement agency to obtain approval from their governing body, via adoption of a “military equipment” use policy by ordinance, prior to the agency funding, acquiring, or using military equipment; and

WHEREAS, on March 14, 2022, the City Council enacted Ordinance #22-01, approving the Police Department’s Military Equipment Policy #707; and

WHEREAS, the Police Department seeks to purchase several new unmanned aerial systems (Drones), receive a donation of a ground robot to enhance officer and community safety, and make amendments to the Military Equipment Use Policy; and

WHEREAS, the equipment listed in the staff report is to be purchased utilizing funding that is already available in the approved Police Department budget and the equipment to be donated, valued at \$25,500, would not have a financial impact on the Police Department budget.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Grover Beach does hereby authorize the Police Department to purchase additional Unmanned Aerial Systems (Drones), accept a donation of a remote-controlled robot, and Update the Police Department’s Military Equipment Policy.

On motion by _____, second by _____, and on the following roll call vote, to wit:

AYES: Council Members:
NOES: Council Members:
ABSENT: Council Members:
ABSTAIN: Council Members:

the foregoing Resolution was **PASSED, APPROVED, AND ADOPTED** at the Regular Meeting of the City Council of the City of Grover Beach, California, this 13th day of June, 2022.

**** D R A F T ****

JEFF LEE, MAYOR

ATTEST:

WENDI SIMS, CITY CLERK

**Policy
707****Grover Beach Police Department**
Grover Beach PD Policy Manual

Military Equipment

707.1 PURPOSE

State § _____

This policy establishes guidelines for the acquisition, funding, use and reporting of "military equipment", as the term is defined in Government Code section 7070. This policy is provided to fulfill the obligations set forth in Assembly Bill No. 481. These obligations include but are not limited to seeking approval on specific items deemed to be military equipment and requirements related to compliance, annual reporting, cataloging, and complaints regarding these items.

707.2 POLICY

State § _____

It is the policy of the Grover Beach Police Department that there are legally enforceable safeguards, including transparency, oversight, and accountability measures in place to protect the public's welfare, safety, civil rights, and civil liberties before military equipment is funded, acquired, or used.

707.3 PHILOSOPHY

State § _____

The acquisition of military equipment and its deployment in our communities may impact the public's safety and welfare. The public has a right to know about any funding, acquisition, or use of military equipment by local government officials, as well as a right to participate in any government agency's decision to fund, acquire, or use such equipment. Decisions regarding whether and how military equipment is funded, acquired, or used should give strong consideration to the public's welfare, safety, civil rights, and civil liberties, and should be based on meaningful public input.

707.4 PROCEDURE

State § _____

A. DEFINITIONS

1. Governing Body – The elected entity that oversees the Grover Beach Police Department
2. Military Equipment – Any of a wide variety of items as defined by California Government Code section 7070, subsections (c)(1) through (c)(16).

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B. GENERAL

1. The Department shall obtain approval of the governing body annually prior to engaging in any of the following activities:
 - a. Requesting military equipment made available pursuant to Section 2576a of Title 10 of the United States Code.
 - b. Seeking funds for military equipment including, but not limited to, applying for a grant, soliciting or accepting private, local, state, or federal funds, in-kind donations, or other donations or transfers.
 - c. Acquiring military equipment either permanently or temporarily, including by borrowing or leasing.
 - d. Collaborating with another law enforcement agency in the deployment or other use of military equipment within the territorial jurisdiction of the governing body.
 - e. Using any new or existing military equipment for a purpose, in a manner, or by a person not previously approved by the governing body pursuant to general order.
 - f. Soliciting or responding to a proposal for, or entering into an agreement with, another person or entity to seek funds for, apply to receive, acquire, use, or collaborate in the use of, military equipment.
2. In seeking the approval of the governing body, the Department shall submit a proposed military equipment use policy, or subsequent amendments, to the City Council and the public via the law enforcement agency's internet website at least 30 days prior to any public hearing concerning the military equipment at issue.

C. MILITARY EQUIPMENT USE CONSIDERATIONS

1. The military equipment acquired and authorized by the Department is:
 - a. Necessary because there is no reasonable alternative that can achieve the same objective of officer and civilian safety.
 - b. Reasonably cost effective compared to available alternatives that can achieve the same objective of officer and civilian safety.
2. Military equipment shall only be used by a Department employee only after applicable training, including any course required by the Commission on Peace Officer Standards and Training, has been completed, unless exigent circumstances arise.

D. MILITARY EQUIPMENT REPORTING CONSIDERATIONS

1. The Department shall submit an annual military equipment report to the Governing Body that addresses each type of military equipment possessed by the Department.
2. The Department shall also make each annual military equipment report publicly available on its internet website for as long as the military equipment is available for use.

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3. The annual military equipment report shall, at a minimum, include the following information for the immediately preceding calendar year for each type of military equipment:
 - a. A summary of how the military equipment was used and the purpose of its use.
 - b. A summary of any complaints or concerns received concerning the military equipment.
 - c. The results of any internal audits, any information about violations of the military equipment use policy, and any actions taken in response.
 - d. The total annual cost for each type of military equipment, including acquisition, personnel, training, transportation, maintenance, storage, upgrade, and other ongoing costs, and from what source funds will be provided for the military equipment in the calendar year following submission of the annual military equipment report.
 - e. The quantity possessed for each type of military equipment.
 - f. If GBPD intends to acquire additional military equipment in the next year, the quantity sought for each type of military equipment.
 - g. Within 30 days of submitting and publicly releasing an annual military equipment report, GBPD shall hold at least one well-publicized and conveniently located community engagement meeting, at which the general public may discuss and ask questions regarding the annual military equipment report and GBPD's funding, acquisition, or use of military equipment. This shall occur as a part of GBPD's presentation to the governing body.

E. CATALOGING OF MILITARY USE EQUIPMENT

All military use equipment kept and maintained by the Grover Beach Police Department shall be cataloged in a way which addresses each of the following requirements:

1. The manufacturer's description of the equipment.
2. The capabilities of the equipment.
3. The purposes and authorized uses for which the Department proposes to use the equipment.
4. The expected lifespan of the equipment.
5. The fiscal impact of the equipment, both initially and for on-going maintenance.
6. The quantity of the equipment, whether maintained or sought.

F. COMPLIANCE

1. The Operations Commander will ensure that all Department members comply with this policy. The Operations Commander will conduct an annual audit with the assistance of the Support Services Commander. The Chief of Police or designee will be notified of any policy violations and, if needed, the violation(s) will be referred to the Internal Affairs

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Division and handled in accordance with Policy 1014. All instances of non-compliance will be reported to City Council via the annual military equipment report.

2. Any member of the public can register a questions or concern regarding military use equipment by contacting the Grover Beach Police Department via email at police@gbpd.org. A response to the question or concern shall be completed by the Department in a timely manner.
3. Any member of the public can submit a complaint to any member of the Department and in any form (i.e. in person, telephone, email, etc.). Once the complaint is received, it shall be routed to the Internal Affairs Division in accordance with Policy 1014 (Personnel Complaints).

G. COORDINATION WITH OTHER JURISDICTIONS

The Grover Beach Police Department participates in the San Luis Obispo County Regional Special Weapons and Tactics (SWAT) team and works closely with other local, county, state, and federal law enforcement partners. In planned or exigent circumstances, and with the approval of the Chief of Police or their designee, military equipment may be deployed by these law enforcement partners to promote the safety and security of Grover Beach community members. The Chief of Police or their designee will provide information during the annual report on the use of military equipment within the city limits of Grover Beach by other law enforcement partners during Grover Beach Police Department operational incidents.

H. FUNDING

The Department shall seek council approval for military equipment, including, but not limited to, applying for a grant, soliciting or accepting private, local, state, or federal funds, in-kind donations, or other donations or transfers.

1. The Department has authority to apply for funding prior to obtaining council approval in the case of exigent circumstances. The Department shall obtain council approval as soon as practicable.

I. REPLENISHMENT AND REPLACEMENT

The Department, operating within its approved budget, may replenish or replace any previously approved piece of equipment that was expended or is no longer serviceable without first getting City Council approval. The Department will highlight the replenishment or replacement in the annual report to City Council.

707.5 LIST OF MILITARY USE EQUIPMENT

Agency Content

(a) Unmanned Aerial Systems (UAS)

1. Description, quantity, capabilities, and purchase cost of current UAS
 - (a) DJI Mavic Mini

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1. Cost: \$500 each
 2. Quantity: 2
 3. Description: Miniature UAS that can record video with approximately 25 minutes of flight time
- (b) DJI Dual Enterprise Advanced
- (a) Cost: \$5,500
 - (b) Quantity: 2
 - (c) Description: UAS that has color and infrared recording camera in addition to a detachable speaker and light. Approximately 30 minutes of flight time.
 - (d) Projected Purchases for fiscal year 2022/23
 - (a) DJI Matrice 30T Combo
 - (a) Cost: \$14,000
 - (b) Quantity: 1
 - (c) Description: UAS that has color and infrared recording camera. Flight time is approximately 45 minutes. Primary use will be large outdoor searches and SWAT operations.
 - (b) Brinc Lemur Tactical UAS
 - (a) Cost: \$8,999
 - (b) Quantity: 1
 - (c) Description: UAS that has color and infrared recording capabilities. Unit is capable of breaking windows, twoway communications, and is ideal for indoor searches.
 - (c) Autel EVO II V2 Pro 6k UAS
 - (a) Cost: \$2,700
 - (b) Quantity: 1
 - (c) Description: UAS with color recording camera and approximately 40 minutes of flight time. Primary use will be crime scene and accident reconstruction.
 - (d) DJI Mavic Mini 3
 - (a) Cost: \$500 each

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(b) Quantity: 5

(c) Description: Miniature UAS that can record video with approximately 25 minutes of flight time.

2. Purpose: To be used for aerial views of major crimes scenes, accident scenes, missing person searches, natural disaster management, SWAT or tactical missions, interior and exterior searches
3. Authorized Use: Only assigned and trained UAS Pilots are authorized to operate GBPD UAS systems. All GBPD Pilots are certified by the FAA.
4. Expected Life Span: 3-5 years
5. Fiscal Impact: Annual maintenance and battery replacement is approximately \$2500
6. Training: All GBPD UAS operators are licensed by the Federal Aviation Administration for UAS operations. Additionally, each operator must complete the GBPD training course.

(b) **Armored Vehicles**

1. Description, quantity, capabilities, and purchase cost

(a) 2008 Lenco Bearcat

1. Cost: \$180,000

2. Quantity: 1

3. Description: Armored vehicle that seats 6-8 personnel with an open floor plan that allows rescue of injured personnel or community members. The armor can stop various projectiles providing great safety to the officers and community.

2. Purpose: To be used in response to critical incidents to enhance safety of the community, officers, and to improve scene containment and assist in resolving critical incidents.
3. Authorized Use: The use of the armored vehicle is limited to GBPD staff members that have received training in the use and operation of the vehicle. Deployments of the vehicle are to be authorized by a Commander or the Chief of Police.
4. Lifespan: Estimated at 20 years
5. Fiscal Impact: Annual Maintenance of approximately \$2500
6. Training: All drivers/operators shall attend training in vehicle operations and practical driving instruction.

(c) **40mm Launchers and Rounds, Bean Bags**

1. Description, quantity, capabilities, and purchase cost

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- (a) Penn arms, 40mm single shot launcher
 1. Cost: \$850
 2. Quantity: 6
 3. Description: Single shot launcher that fires standard 40mm less lethal ammunition
- (b) Penn arms, 40mm multi launcher
 1. Cost: \$2720
 2. Quantity: 1
 3. Description: Multiple shot launcher that fires standard 40mm less lethal ammunition
- (c) 40mm rounds, CTS 4504
 1. Cost: \$1,057
 2. Quantity: 120
 3. Description: Foam projectile shot from a 40mm launcher
- (d) Bean Bag Rounds, Accusox Brand
 1. Cost: \$1,200
 2. Quantity: 400
 3. Description: Kevlar/Cotton sock type material filled with lead pellets
2. Purpose: To limit escalation of conflict where employment of lethal force is prohibited or undesirable
3. Authorized Use: Situations for which the launchers/bean bags may be used may include, but are not limited to:
 - (a) Self-destructive, dangerous, and/or combative behavior
 - (b) Riot/crowd control and civil unrest
 - (c) Circumstances where a tactical advantage can be obtained
 - (d) Potentially vicious animals
 - (e) Training exercised or approved demonstrations
4. Training: Sworn members using 40mm less lethal munitions are trained in their use by POST Certified instructors
5. Lifespan: 15 years
6. Fiscal Impact: Annual maintenance is estimated to be \$100 annually

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(d) **Rifles**

1. Description, quantity, capabilities, and purchase cost (a) Colt M-4 5.56 Cal.
 1. Cost: \$1300
 2. Quantity: 9
 3. Description: Gun that are fired from shoulder level, having a long spiral grooved barrel intended to make bullets spin and thereby have greater accuracy over a long distance (b) Colt M-16 A2.223 Cal.
 1. Cost: \$1000
 2. Quantity: 2
 3. Description: Gun that are fired from shoulder level, having a long spiral grooved barrel intended to make bullets spin and thereby have greater accuracy over a long distance
- (c) Accuracy International.308 sniper rifle
 1. Cost: \$4,600
 2. Quantity: 1
 3. Description: Gun that are fired from shoulder level, having a long spiral grooved barrel intended to make bullets spin and thereby have greater accuracy over a long distance
2. Purpose: To be used as precision weapons to address a threat with more precision and/or greater distances than a handgun
3. Authorized Use: Use is limited to GBPD officers that are POST certified and trained in rifle use
4. Lifespan: 10-15 years
5. Fiscal Impact: Annual maintenance for the rifle is approximately \$100
6. Training: Prior to using a rifle, officers must be trained by POST instructors and must pass an annual qualification.

(e) **Distraction Devices**

1. Description, quantity, capabilities, and purchase cost
 - (a) Defense Tech 15 GM Low Roll
 1. Cost: \$50/each
 2. Quantity: 6
 3. Description: Distraction device that delivers a loud "bang" and flashing light

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2. Purpose: A distraction device is commonly used when trying to distract dangerous suspects during emergency situations such as hostage calls, search warrants, and violent crimes. These devices use atmospheric over-pressure and brilliant white light to temporarily distract for a tactical advantage.
3. Authorized Use: Distraction devices are only to be used by trained operators. Use is covered by GBPD policy. These devices are commonly used in high risk situations commonly handled by a SWAT team.
4. Training: Prior to use, officers must attend and pass training provided by a POST certified instructor.
5. Lifespan: Until used.
6. Fiscal Impact: No annual maintenance.

(f) **Tear Gas**

1. Description, quantity, capabilities, and purchase cost
 - (a) Defense Tech Riot Control Discharge Grenade, OC
 1. Cost: \$35/each
 2. Quantity: 6
 3. Description: Delivers large plumes of smoke and OC agent
 - (b) Defense Tech Riot Control Discharge Grenade, CS Smoke
 1. Cost: \$25/each
 2. Quantity: 4
 3. Description: Delivers large plumes of smoke and CS agent
 - (c) Defense Tech Triple Chaser Riot Control Discharge Grenade, CS
 1. Cost: \$44/each
 2. Quantity: 2
 3. Description: Delivers large plumes of CS agent
2. Purpose: To limit the escalation of conflict where employment of lethal force of prohibited or undesirable.
3. Authorized Use: Only officers trained in the use of chemical agents by a POST certified trainer are authorized to deploy chemical agents.
4. Training: Sworn members using chemical agents are to attend a POST certified training prior to use.
5. Lifespan: 5 years from manufacturing date
6. Fiscal Impact: No annual maintenance.

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(g) **Mobile Command Vehicles**

1. Description, quantity, capabilities, and purchase cost
 - (a) ~~1994 Chevrolet Command Vehicle~~
 1. ~~Cost: Donated, no cost~~
 2. ~~Quantity: 1~~
 - (b) 2021 LDV Command Vehicle ~~(To be acquired in 2022)~~
 1. Cost: \$372,000
 2. Quantity: 1
2. Purpose: To be used as a mobile command post for large incidents, crime scenes, community events, emergencies, and tactical situations
3. Authorized Use: Only officers trained the operation of the mobile command vehicle may drive/operate the vehicle.
4. Lifespan:
 - (a) ~~1994 Chevrolet: 1 year~~
 - (b) (a) 2021 LDV MCV: 20 years
5. Fiscal Impact: Annual Maintenance of \$1000
6. Training: Drivers/Operators of the MCV shall have approved GBPD training and appropriate State of California drivers license.

(h) **Military Surplus Generator**

1. Description, quantity, capabilities, and purchase cost
 - (a) 2010 IPTHR Utility Trailer with Generator
 1. Cost: No cost
 2. Quantity: 1
 3. Description: Portable generator used to create electric power
2. Purpose: To be used during situations requiring electric power.
3. Authorized Use: Users are limited to those that have been provided department training on the use and setup of the equipment.
4. Training: Training on the use and operation is provided by staff of the GBPD who are trained in the operation of the equipment.
5. Lifespan: 10 years
6. Fiscal Impact: None

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(i) ~~Military Surplus Mobile Kitchen~~

~~1. Description, quantity, capabilities and purchase cost~~

~~i. Unknown year Utility Trailer with Mobile Kitchen~~

1. ~~Cost: No Cost~~

2. ~~Quantity: 1~~

3. ~~Description: Mobile kitchen and food preparation when needed in certain emergency situations.~~

b. ~~Purpose: To be used during situations requiring food preparation on a large scale.~~

c. ~~Authorized Use: Users are limited to those that have been provided department training on the use and setup of the equipment.~~

d. ~~Lifespan: 10 years~~

e. ~~Fiscal Impact: None~~

10. Riot Helmets

a. Description, quantity, capabilities and purchase cost

i. Protech Helmets

1. Cost: \$575 each

2. Quantity: 25

3. Description: Black strap closure helmets with ballistic protection

b. Purpose: To be used during situations requiring proper head protection against objects or gunfire.

c. Authorized Use: Users are limited to those that have been provided department training on the use and setup of the equipment.

d. Lifespan: 10 years

e. Fiscal Impact: None

11. Riot Shields

a. Description, quantity, capabilities and purchase cost

i. Plastic Shields

1. Cost: \$275 each

2. Quantity: 8

3. Description: black shield with arm and shoulder mounting straps

b. Purpose: To be used during situations requiring protection of officers from objects.

c. Authorized Use: Users are limited to those that have been provided department training on the use and setup of the equipment.

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- d. Lifespan: 10 years
- e. Fiscal Impact: None

12. Riot Batons

- a. Description, quantity, capabilities and purchase cost
 - i. Batons
 - 1. Cost: \$25 each
 - 2. Quantity: 8
 - 3. Description: Black riot baton
- b. Purpose: To be used during situations requiring protection of officers from hostile crowds.
- c. Authorized Use: Users are limited to those that have been provided department training on the use and setup of the equipment.
- d. Lifespan: 10 years
- e. Fiscal Impact: None

13. Remote Control Robot (Projected Donation for Fiscal Year 2021/22)

(a) Transcend Robotics Vantage Model

- (a) Cost: No cost. (\$25,500 value)
- (b) Quantity: 1
- (c) Description: Radio controlled ground robot with a camera used to search for dangerous suspects.
- (d) Purpose: To be used for searching high-risk locations where a robot can be used to improve officer and community safety.
- (e) Training: GBPD employees authorized to deploy the robot will be required to complete minimum training as required by the manufacturer.
- (f) Fiscal Impact: Annual maintenance and battery replacement is estimated at approximately \$250.
- (g) Expected Life Span: 5-7 years
- (h) Authorized Use: Authorized users include any GBPD employee with required training.