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November 10, 2026

BPC #26-341

The Honorable City Council
City of Los Angeles, Room 395
c/o City Clerk's Office
Los Angeles, CA 90012

Dear Honorable Members:

RE: CITY COUNCIL FILE NO. 25-0696 – OPERATIONAL IMPACTS OF THE PROPOSED LESS LETHAL ORDINANCE

At the regular meeting of the Board of Police Commissioners held on Tuesday, November 10, 2026, the Board APPROVED the Department's report regarding the above-referenced matter.

Accordingly, this report is respectfully submitted for your consideration.

Respectfully,

BOARD OF POLICE COMMISSIONERS

REBECCA MUNOZ
Commission Executive Assistant

Attachment
c: Chief of Police

KJ 11/5/26 26-341

INTRADEPARTMENTAL CORRESPONDENCE

November 4, 2026
1.1

TO: The Honorable Board of Police Commissioners

FROM: Chief of Police

SUBJECT: COUNCIL FILE 25-0696: OPERATIONAL IMPACTS OF THE PROPOSED LESS LETHAL ORDINANCE

RECOMMENDED ACTIONS

1. That the Board of Police Commissioners REVIEW and APPROVE the attached Department letter.

2. That the Board of Police Commissioners TRANSMIT the Letter to City Council.

Attached for review and consideration of approval to transmit to City Council is a Department Letter drafted by the Constitutional Policing and Policy Bureau in response to Council File 25-0696: Operational Impacts of the Proposed Less Lethal Ordinance. The proposed ordinance would likely create numerous issues of concern regarding the topics of public and officer safety, legal issues, and City liability.

If additional information regarding this report is required, please contact the Constitutional Policing and Policy Bureau, at (213) 486-8730.

Respectfully,

JIM McDONNELL
Chief of Police

BOARD OF
POLICE COMMISSIONERS
Approved November 10, 2026
Secretary Rebecca Muñoz

Attachments

LOS ANGELES POLICE DEPARTMENT

JIM McDONNELL
Chief of Police

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Los Angeles, Calif. 90030
Telephone: (213) 486-0150
TDD: (877) 275-5273
Ref # 1.14

KAREN BASS
Mayor

November 4, 2026

The Honorable Public Safety Committee
Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Re: Council File 25-0696: Operational Impacts of the Proposed Less Lethal Ordinance

Honorable Members,

The right to peaceful protest is a vital thread in the fabric of our democracy. The Department's role at a demonstration is to facilitate that expression and to protect the people exercising it, including from the few who come to interfere with it. What the community expects of police at protests, celebrations, and other events involving large gatherings has changed a great deal over the past decade. The Department continues to revise its crowd management policies and training as conditions, expectations, and the law change, and we will keep doing so.

The Council asked the Department to describe the operational impacts of an ordinance of the kind described in the Committee report. There is no draft ordinance for review. There are eight sections described in the report, and this letter takes them as written[1]. Overall, implementation of an ordinance as described in Council File 25-0696 would make the public, our officers, and the City less safe, and would increase the City's liability.

The most serious problem is section (a). It would bar City employees from deploying kinetic energy projectiles or chemical agents except against an individual posing an imminent threat of death or serious bodily injury, where no safer alternative exists. That is the state standard for deadly force, and nothing in the language of that section limits it to crowds. The intent may be narrower than the text, but as written the section would end the use of less-lethal weapons governed by AB 481 as intermediate force options. Taking these tools away from officers facing a person in crisis, a person with an edged weapon, or a barricaded subject would return us to the methods that led the Department, and the profession of policing overall, to adopt more moderate force options in the first place.

[1] Public Safety Committee Report, Council File 25-0696 (Nov. 12, 2025), Recommendations 1–3 & sections (a)–(h).

These tools are already regulated by law. Penal Code section 835 (a) governs all force. Section 13652 bars kinetic energy projectiles and chemical agents to disperse any assembly except by trained officers, only against a threat to life or serious bodily injury or an objectively dangerous and unlawful situation, and only after de-escalation and repeated warnings. It requires officers to target the individuals engaged in violence rather than the crowd, bars aiming at the head or neck, and bars use for mere noncompliance. Section 13652.1 requires a public summary of every crowd-control use within 60 days.[2]

The City's AB 481 ordinance and the Department's directives add to that backstop. They place these tools in the intermediate range of force options — an immediate threat to the safety of officers or others, or an articulable risk of escalation to deadly force — and prohibit their use against an unarmed person who is merely noncompliant. Each tool has its own authorization requirements, set according to its potential for harm. Every categorical use of force is reviewed by the Board of Police Commissioners and the Inspector General; all other force is reviewed internally and audited. Professional Standards Bureau received 75 complaints about AB 481 equipment in 2025 and sent one to a Board of Rights. As the Department continues to investigate and adjudicate complaints involving AB 481 equipment, it remains committed to maintaining accountability, transparency, and fairness to all the involved parties and identifying areas where the Department can improve while working with City leadership to address internal and community concerns. It is important to note that the City has built systems of internal and external accountability for this Department.[3]

Measured against that law, the sections of the proposed ordinance raise the following operational issues.[4]

	What the section provides	Operational issue
(a)	Bars kinetic energy projectiles and chemical agents except against an individual posing an imminent threat of death or serious bodily injury, with no safer alternative.	This is the deadly-force standard applied to intermediate tools. It removes the options between commands and hands-on force for the armed subject who remains at a distance, the barricaded subject, and violent people in crisis. It also eliminates crowd use of the 40mm launcher, the 37mm launcher, and chemical agents that section 13652 permits with restrictions, leaving only close-quarter impact weapons when a crowd turns violent. The closer a conflict becomes, the greater the risk to both employees and the public.

[2]Pen. Code §§ 835a, 13652, 13652.1.
[3]Ordinance No. 187603; Department Manual § 1/140.25; 2025 AB 481 Annual Equipment Report (AD No. 26-001), Tables 2 and 3; Use of Force Directives Nos. 3.1, 4, 5.1, and 12.
[4]Sections (d) (private right of action), (f) (Board rulemaking deadline), and (h) (conditions on mutual aid) are not addressed in this chart. The Council asked the Department for operational impacts, not legal analysis, and the Department defers to the City Attorney on the legality and appropriateness of those sections.

	What the section provides	Operational issue
(b)	Warnings and an egress route in every case; one round per person; fixed restricted areas with no exception.	Warnings, where feasible, are already required for every deployment, and egress routes are already part of crowd dispersal procedure. Egress has no meaning for individuals as they would be arrested, not dispersed. Current directives allow targeting restricted areas of the body only when lethal force is authorized; section (b) removes that qualifier. The one-round per person rule does not account for what happens when that round is fired and the threat remains.
(c)	Council approval for each acquisition of crowd-control munitions; Council-set stockpile limits; destruction of excess.	This duplicates the annual AB 481 review the Board already conducts and the Council already approves, adds a second approval cycle for munitions already authorized, and makes operational capacity and planning uncertain.
(e)	Location-specific posting of every deployment within 24 hours; compliance metrics in the AB 481 report.	Section 13652.1 already requires a public summary within 60 days. A 24-hour requirement during a multi-day event is unrealistic.
(g)	Any violation is serious misconduct; termination available.	Out-of-policy uses of force are already serious misconduct under the Department Manual. Discipline standards belong in the discipline policy, not restated in each section of an ordinance.

The Department will keep working with the Board of Police Commissioners to improve its crowd management policy and will expand training in this area. Importantly, the Department is already doing so in advance of the Super Bowl in February 2027 and the 2028 Olympic and Paralympic Games, as all officers must be ready for every kind of crowd those events bring. Any changes to the Department's crowd management policy and training must be done thoughtfully with full regard to operational realities.

Respectfully,

JIM McDONNELL
Chief of Police