December 20, 2017

Dear Secretary Elaine L. Chao:

On behalf of California Governor Edmund G. Brown Jr., the Governor’s Office of Business and Economic Development, and the Governor’s Military Council, we write to urge your full consideration of the City of San Diego’s application for the new Unmanned Aerial Systems (UAS) testing authority offered through the Federal Aviation Authority’s (FAA) Integrated Pilot Program (IPP). We thank you for your leadership in launching this program and your dedication to advancing the integration of UAS into the national air space. As the country’s most populous state with the most jobs in the unmanned systems sector, a successful IPP program in California will have large implications on the national and global UAS markets.

California’s global position as a capital of innovation, especially in autonomy, coupled with the presence of the largest concentration of aerospace and defense manufacturers in the country, speaks to the overwhelming significance that California’s economy has on the United States and the competitiveness of San Diego’s application. No other state in the nation has more unmanned systems industry jobs than California, and the San Diego region has a high concentration of those jobs. The state’s diverse geography, climate variance, leading educational institutions, existing UAS industry expertise, interconnected military testing ranges and training operations, and industrial resources enable California an unparalleled value proposition for the pilot program. The region’s expertise in managing diverse controlled air spaces, ranges which are mixed with air, land, and water transportation systems, commercial airport, military airports and bases, also contribute to the strength of San Diego’s application. In addition, there is nowhere else in the country where you can fly in continuous airspace containing such diversity, including the San Diego region’s 350 clear flying days a year, over a mix of land uses, levels of development, and terrains.

With the City of San Diego’s participation in the Department of Transportation’s autonomous vehicle proving ground program, their application represents a unique opportunity to leverage existing federal investments to test the interoperability of land and air vehicles. Further, San Diego’s shared border with Mexico, and close regional ties to local counterparts in Tijuana, will provide a unique opportunity to test how international UAS traffic could be both managed and leveraged. The active support of corporate partners in the region and the state significantly enhance the merits of San Diego’s application and will enable quick industry adoption, further advancing the FAA mission to integrate UAS into the national airspace in a distinct way unlike any other major metropolitan region in the country.
California is well positioned to conduct the testing and analysis of unmanned systems, and the state is ready to support San Diego in this endeavor. The aviation expertise from the state’s UAS and aerospace industry, knowledge base of existing researchers, engineers, developers and aviators, partnered with organizations and institutions, and supportive active military installations supports a truly collaborative business and government ecosystem. The long history of UAS Test and Evaluation at military installations in California guarantees that the in-state expertise to integrate this technology into the National Airspace already exists.

The State of California fully supports San Diego in the establishment of ranges for the testing of UAS that will enhance the FAA’s ability to integrate systems into the national airspace in a timely manner. We thank you for your consideration of San Diego’s application, and look forward to an affirmative response and in working with you to ensure that this initiative facilitates the quick, innovative and safe evolution of the unmanned aerial industry.

Sincerely,

[Signature]

Panorea Avdis
Director
Governor’s Office of Business and Economic Development

[Signature]

Col. Rocky Chávez, USMC (ret.)
Chair, Governor’s Military Council
California State Assemblymember (AD-76)

[Signature]

VADM Jody Breckenridge, USCG (ret.)
Vice-Chair, Governor’s Military Council