

March 20, 2015

The Honorable Dianne Feinstein
United States Senator
331 Hart Senate Office Building
Washington, DC 20510



Dear Senator Feinstein,

The Golden Gate Bridge, Highway and Transportation District (District) strongly supports your efforts to regulate the use of small unmanned aircraft through the introduction of new legislation. Small unmanned aircraft, or drones, are an exciting new technology with many commercial and industrial applications, including applications of interest to us here at the District. For example, we are currently exploring their potential use as a tool for our Bridge inspectors to inspect difficult to access locations on the Bridge. At the same time, the presence of drones flying in the immediate vicinity of the Golden Gate Bridge has become quite common, now occurring several times per month. Given that the Golden Gate Bridge is an international icon and critical transportation link, it has been and continues to be a significant focus in the infrastructure security community at the Federal, State and local levels. The operation of drones near the Golden Gate Bridge of course is of great concern to the District and to the agencies comprising the Golden Gate Bridge Security Coalition. We strongly support your effort to regulate this new type of aircraft.

The type of aircraft we now see at the Bridge cover the full spectrum from sophisticated commercial multi-copters and flying wing type drones carrying high resolution video equipment, to small inexpensive quad-copters flown by hobbyists. These aircraft display no identifying markings and are not visible to air traffic control or piloted aircraft. New technologies allow drones to fly remotely over long distances, well out of the line-of-sight of the operator. This makes it difficult if not impossible to identify the operator of a particular drone that is flying near the Bridge, and because of the unmistakable potential danger posed by the use of such craft by those with both horribly malicious and benign motives, we believe all drones, including the small low flying hobbyist type, should be regulated.

The increased presence of these unmanned aircraft is a major threat, and is a significant concern to those charged with the security of the Golden Gate Bridge. On several occasions, we have observed drones flying in areas that are off limits to the public for security reasons, such as behind security fences, gates and intrusion detection sensors, which are not obstacles to drones. Drones carrying sophisticated high resolution camera equipment have been observed flying in areas where, for security reasons, we do not allow photography.

While it is difficult to identify operators of these drones, even when such identification is possible, law enforcement personnel are unable to cite the operator for any specific offense. Local agencies lack authority to restrict their "airspace," and the presence of drones in restricted areas does not fit neatly into existing definitions of trespassing. Thus, we believe there should be

a mechanism for an agency to restrict airspace around its facilities for security purposes, or to petition the FAA to do so. Violations of such restrictions should be citable offenses.

Another significant concern about drones flying near the Bridge is the safety of the drivers, pedestrians and bicyclists who use our Bridge. We routinely observe drones flying directly over traffic and the thousands of pedestrians and bicyclists who use the sidewalks. Often, these aircraft are flown by inexperienced hobbyists. In one recent incident, an inexperienced drone hobbyist crashed an inexpensive quad-copter, purchased online, onto the Bridge roadway. Fortunately, no vehicles, bicyclists, or pedestrians were hit and no one was injured; but it is easy to imagine the havoc that could have been wrought. It is important that regulations and airspace restrictions apply to all unmanned aircraft, even the very lightweight, inexpensive and low flying variety.

It is not difficult to envision scenarios where the malicious use of such aircraft could be used not just for surveillance of bridge infrastructure, but with the intent to create harm. With full appreciation of the commercial and recreational use of such aircraft; their misuse need only occur once to result in tragedy.

Again, our nation needs a mechanism to effectively, and in an enforceable manner, prohibit the use of these emerged and emerging technologies in a way that does not jeopardize public safety and our critical infrastructure.

We have had a number of conversations with the FAA on this topic and are encouraged with its focus on rulemaking to address some of these concerns. We will be commenting on the FAA's most recent proposed regulations and will continue to work to encourage the enactment of regulations regarding where and when these aircraft can and cannot be flown, and to establish qualifications for operators and standards for the aircraft.

Once again, we appreciate your efforts to pursue legislation regulating the use of drones. We look forward to working with you on your efforts relating to the "Drone Safety Act."

Sincerely,



Denis J. Mulligan
General Manager