

Lauren Otani, Environmental Scientist
Department of Pesticide Regulation
1001 I Street, P. O. Box 4015
Sacramento, CA 95812-4015

Dear Ms. Otani,

The Mosquito and Vector Control Association of California (MVCAC) appreciates the opportunity to comment on the proposed regulatory action regarding the Pest Control Aircraft Pilot Certification DPR Regulation No. 18-003. MVCAC is composed of 66-member agencies across the state. MVCAC is tasked with protecting public health using environmentally sound practices to control mosquitoes and the diseases they vector. MVCAC works collaboratively with numerous federal, state, and local agencies including the California Department of Public Health (CDPH), the California Department of Pesticide Regulation (CDPR), and local County Agricultural Commissioners.

We are pleased to support CDPR's continued work to implement Unmanned Vector Control Technicians and Unmanned Pest Control Aircraft Certification. As technology has moved forward with the advancement of unmanned aerial vehicles, we recognize the need for the continued implementation of regulations to protect the public while making use of the new technology. As Vector Control Technicians, we are certified by CDPH to use pesticides to protect the public health; this is a prerequisite in the proposed DPR regulations and demonstrates our knowledge of applicable laws and regulations and an understanding of mosquito biology and control methods. The ability to use unmanned aerial vehicles (UAV) to not just survey for standing water, but to ultimately apply pesticides directly to the water to control larval mosquitoes, or near water to control adult mosquitoes, will allow us to continue our commitment to protecting the public while remaining efficient and environmentally responsible.

We further understand that creating a new examination focused on UAV technology may take more time than we expect. However, we would like to propose a potential solution that would allow us to move forward with UAV use while demonstrating our knowledge regarding aerial applications. As we wait for the Unmanned Vector Control Technician Aircraft Pilot Certification Examination to be constructed, we would be willing to take the Manned Pest Control Aircraft Pilot Certification (PCAP). It is clear that the Manned PCAP focuses on safely applying pesticides, something that we already do and would continue to do. Allowing us to take this exam would allow us to plan pesticide applications via UAV for our 2019 season. Alternatively, if the Unmanned Exam will be ready for scheduling by March 2019, we would be willing to wait until then. Being certified to apply pesticides via UAV by April will allow us to best schedule our work to protect the residents and visitors of California.

We look forward to continuing to work collaboratively with CDPR to protect public health.

Sincerely,

A handwritten signature in black ink, appearing to read "David Heft", written in a cursive style.

David Heft
President – Mosquito and Vector Control Association of California