



FLORIDA KEYS

MOSQUITO CONTROL DISTRICT

Board of Commissioners

Stephen K. Smith, Chairman
Jill Cranney-Gage, Vice Chairman
Phil Goodman, Secretary/Treasurer
Jack Bridges
William Shaw

Executive Director
Michael S. Doyle

5224 College Road
Key West, FL 33040

Telephone: (305) 292-7190
FAX: (305) 292-7199

www.keysmosquito.org

September 15, 2014

Dear Mayor Cates and City Commissioners:

The Florida Keys Mosquito Control District (FKMCD) supports Commissioner Weekley's initiative to limit operations of unmanned aircraft systems (UAS) in airspace over Key West.

This is of great interest to the FKMCD because we regularly fly helicopters at very low altitudes, for several hours at a time, directly over the residential and business areas of Key West. FKMCD is currently flying helicopters for approximately 65 linear miles per mission, at approximately 75 feet above ground, while conducting aerial mosquito treatments over Key West to control domestic mosquitoes in and around homes. We're conducting these missions as often as every week during the rainy season. In addition, we also conduct numerous helicopter larvicide missions for nuisance mosquitoes elsewhere on the island (open marshes, tidal areas, right-of-ways, etc.) as rainfall and tidal changes mandate.

Our missions are flown well within the operational altitude of a UAS and far too close to the ground for our helicopters to see and avoid any UAS that may happen to pop up. Having a midair collision between a helicopter and a UAS would certainly create a disaster that would have far reaching impact on potential damage to property on the ground as well as potential loss of human life.

We realize the Federal Aviation Administration (FAA) has been working to ensure the safe integration of unmanned aircraft systems (UAS) in the National Airspace System (NAS). The FAA's sole mission and authority as it focuses on the integration of unmanned aircraft systems is safety.


Already, the agency has achieved the first unmanned aircraft systems milestone included in the 2012 FAA reauthorization – streamlining the process for public agencies to safely fly UAS in the nation's airspace.

Federal, state and local government entities must obtain an FAA Certificate of Waiver or Authorization (COA) before flying any UAS in the NAS.

FKMCD has begun the process to obtain a COA for testing and evaluating potential use of drones to locate mosquito breeding sites in remote and difficult to access offshore islands. As part of the COA process we are currently prohibited from flying within 5 miles of an airfield and over congested housing areas. This incorporates all of Key West as a no fly zone for drones operated by Public Use Operators, Governmental agencies such as FKMCD, under an FAA COA.

Unfortunately, The FAA does not have regulations pertaining to UAVs at this time. Until they do, it is the FKMCD belief that the airspace over Key West would be far safer by limiting UAS operations. Even though the FAA is working on this issue, should Key West pass an ordinance, they would be able to respond far more rapidly than the FAA could at this juncture in the FAA process to regulate the use of UAS.

We would recommend your proposed ordinance include language allowing the operation of UAS by "Public Use" entities such as the Key West Police Department and other organizations that fall within the "Public Use" definition.

 , for Michael Doyle

Michael S. Doyle, Executive Director