

Draft Instructional Memorandum (IM)

Topic: BLM Application of Department Level UAS Policy

Background

The Department of Interior released Secretary's Order (SO) 3379 on 1/29/20. This order, in conjunction with previous Departmental direction, prohibits BLM purchase, contract, and operation of UAS except for **Emergency UAS Operations** and **Emergency UAS Readiness**. This policy is in effect until additional guidance (i.e. Designated UAS) is issued by the Department.

Definitions (SO 3379)

An **Emergency UAS Operation** is defined as: 1) a UAS mission to fight Wildland Fire, measures to help prevent Wildland Fire, and monitor for or respond to a potential/declared national or state Emergency involving human safety or to prevent imminent damage to human life and property; or 2) a human search and rescue effort that involves the preservation or safety of human life or physical property.

Emergency UAS Readiness is defined as training necessary to maintain FAA-approved (part 107) certification to operate a UAS for Emergency Operations. Approvals will be limited to missions that will assist UAS operators to maintain their minimum FAA-certification requirements and where the operator reasonably anticipates the need to operate a UAS for Emergency Operations within the next year.

BLM Application of Departmental Policy

1. BLM will only perform UAS operations that meet the definition of **Emergency UAS Operation** or **Emergency UAS Readiness**.
2. BLM employees holding the Unmanned Aircraft Systems Pilot (UASP) or UASP (T) Incident Qualifications and Certification System (IQCS) qualification are authorized to conduct **Emergency UAS Operations** as defined above. These operations must be documented on the Emergency Operation Reporting Form and submitted in accordance with Departmental requirements. Additional BLM guidance (below) applies.
3. BLM employees holding the UASP or UASP (T) qualification are authorized to perform **Emergency UAS Readiness** as defined above. UASP/UASP (T) must submit an Emergency Readiness Waiver request in accordance with Departmental requirements. Additional BLM guidance (below) applies.
4. BLM personnel who do not hold the UASP or UASP (T) qualification are not authorized to conduct UAS flights unless the operation is in response to a life-threatening emergency as described in the BLM National Aviation Plan (NAP).

BLM NAP: 5.6 Emergency Exception to Policy:

Federal employees who are involved in an event in which there clearly exists an imminent threat to human life, and there is insufficient time to utilize approved methods, may deviate from policy to the extent necessary to preserve life (reference 350 DM 1.3.B). The following provisions and follow-up actions apply:

- *Personnel involved are expected to use good judgment.*
 - *Personnel involved in the decision making associated with deviating from policy must weigh the risks verses benefit.*
 - *Any deviations must be documented on a SAFECOM.*
5. BLM will not acquire (purchase or lease) UAS for any purpose.
 6. BLM will not conduct initial UAS training (A-450).

7. BLM will not expend funds on contract UAS (including end product), exercise cooperative agreements, authorize grants, or other agreement between the BLM and another party for which UAS is utilized for any operation other than **Emergency** as defined above.
8. Entities may not utilize UAS to collect data on DOI lands which is intended to be given to the BLM for any purpose aside from **Emergency Operations**.
9. The BLM Call when Needed (CWN) UAS contract may be utilized for **Emergency Operations/Emergency Readiness** only. These operations must be documented on the Emergency Operation Reporting Form by the UAS Manager (UASM) and submitted in accordance with Departmental requirements. Additional BLM guidance (below) applies.
10. Non-DOI entities such as hobbyist, university, commercial, etc. operating UAS on DOI lands are **not impacted** by this directive provided their operations do not benefit the BLM. Operations of this type must comply with FAA and local land use policy.

Additional Guidance for UASP and UASM

1. **Emergency Operations** and **Emergency UAS Readiness** flights will be conducted in accordance with the SO 3379, *The Interagency Standards for Fire UAS Operations*, (PMS 515), OPM-11, the *Interagency Standards for Fire and Fire Aviation Operations*, and the *BLM National Aviation Plan*.
2. Flight reporting will be conducted in accordance with the Commercial off the Shelf UAS Emergency Operation Reporting Form and OPM-11.
3. Emergency Readiness Waiver requests must be submitted to the BLM UAS Program Manager or designee via uas_training@firenet.gov. **Do not send Emergency Readiness Waiver Requests to the email address on the form.** The UAS Program Manager or designee will review and forward appropriate requests in accordance with Departmental policy.
4. UAS Emergency Operation Report forms will be routed to DOI by the UASP or UASM (official directing the UAS operation) to uas@ios.doi.gov and uas_training@firenet.gov.

Attachments:

[Secretary's Order 3379](#)

[Implementation Guidance of Secretary's Order 3379](#)

[UAS Waiver and Reporting Form Instructions](#)

[Commercial Off the Shelf UAS Emergency Readiness Waiver Form](#)

[Commercial Off the Shelf UAS Operation Reporting Form](#)

[BLM IQCS Roster \(UASP and UASP T\)](#)

[BLM Remote Pilot Roster \(OAS Carded\)](#)