



United States Department of the Interior

National Business Center

Aviation Management

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DOI AM OPERATIONAL PROCEDURES (OPM) MEMORANDUM NO. 04-29

Subject: Special Use Activities and Revised Standards for Technical Oversight

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Supersedes: OPM 04-29 dated January 1, 2004

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.1 Purpose. This OPM establishes policies and procedures regarding: (a) special use activities, and (b) inspection and technical oversight of vendor pilots and aircraft flying for the Department of the Interior (DOI). It was written to preclude duplication of effort between DOI and the Federal Aviation Administration (FAA) while recognizing that DOI has Departmental oversight responsibilities that must be performed.

.2 Authority. This policy is established by the Associate Director, Department of the Interior, Aviation Management (DOI AM), in accordance with the provisions of Departmental Manual 350 DM 1 and Secretarial Order 3250 dated September 30, 2003.

.3 Definitions.

A. Point-to-Point Transportation. Flights between airports (excluding operations defined in paragraph .3C below and in 351 DM 1.7 as "special use") where the route of flight is determined by the pilots, based upon navigational requirements.

B. High Reconnaissance. A route of flight which includes reconnaissance and is conducted above 500' above ground level (AGL). This reconnaissance does not include any aircraft maneuvers which are in excess of commercial pilot skills, maneuvering below 1.4 VSO (airplane landing configuration stall speed), or climbs/turns/descents greater than the standard rate. This does not include any type of precise maneuvering or specialized equipment.

C. Special Use Activities. Operations involving the utilization of airplanes and helicopters in support of DOI programs which are not point-to-point flight activities and which require special control measures due to their inherently higher risk. This may require deviation from normal operating practices where authorized by DOI AM. Special pilot qualifications and techniques, special aircraft equipment, and personal protective equipment are required to minimize risk to personnel and property. These activities include:

Low level flight (within 500' of the surface)
Mountain flying (helicopter)
Resource reconnaissance
Fire reconnaissance
Air tactical group supervision
Toe-in, single-skid, and step-out landing (helicopter)

Cargo letdown
External load - short line $\leq 50'$ (helicopter)
External load - longline $> 50'$ (helicopter)
Rappel
Short-haul

Offshore platform landings (helicopter)
Vessel landings
Water landings - floats or hull (helicopter)
Wheel operations on unprepared landing areas (airplane)

Animal darting, paint ball
Animal eradication
Animal gathering and capture
Airframe mounted net gun (helicopter)
Handheld net gun

Aerial ignition
Night vision goggles
Smoke jumping/paracargo
Water/retardant application

Note: Future flight activities may be developed which should also be identified as special use. If a question exists, the applicable DOI AM regional/area office should be consulted.

D. Precision Reconnaissance. This type of reconnaissance is conducted above 500' AGL. Transect-type operations, utilization of specialized equipment, or missions not normally conducted in the commercial sector are examples of specific tasks that require special consideration. Precision reconnaissance is divided into three subcategories: resource reconnaissance, fire reconnaissance, and air tactical group supervision. These special use activities do not require the use of PPE, survival kits, or first aid kits because they are conducted exclusively above 500' AGL and are considered low risk.

E. Administrative Approval Document. A written notice, issued by DOI AM and carried aboard the aircraft, from which the user can verify that the vendor has a current and approved aircraft rental agreement for that specific aircraft. **Note: This document DOES NOT denote a DOI technical inspection or approval.**

.4 Policy. All vendor pilots flying for DOI shall conform to the standards contained in 351 DM 3 and all vendor aircraft flying for DOI shall conform to the standards contained in 351 DM 2. Vendor pilots and aircraft flying only point-to-point transportation and high reconnaissance shall comply with 14 CFR 135 and applicable state regulations for operations, maintenance, and equipment. Personal protective equipment (PPE) requirements will be as specified in the *ALSE Handbook* as amended by this OPM.

.5 Procedures.

A. Vendor Pilots.

1) Pilots shall document their experience on the OAS-64, Interagency Pilot Qualifications and Approval Record, and submit this form to DOI AM.

2) DOI AM will complete an administrative pilot review of flight experience, medical currency, 14 CFR 135 checkride currency, accident/violation history, and DOI Aviation Mishap Information System (AMIS) history and as documented on the OAS-64.

3) After it has been determined that a pilot meets the experience requirements and a satisfactory administrative review has been completed, point-to-point transportation and high reconnaissance pilot qualifications may be issued for a two-year cycle period (not to exceed 26 months).

4) Pilot approval for special use activities will be in accordance with 351 DM 3 and the following flight evaluation intervals:

a) An initial flight evaluation will be conducted for each special use activity to be flown regardless of whether or not periodic evaluations are required.

b) The following special use activities require only an initial evaluation:

- Aerial ignition
- Airframe mounted net gun (helicopter)
- External load - short line ≤50'(helicopter)
- Low-level flight (helicopter)
- Mountain flying (helicopter)
- Offshore platform landings (helicopter)
- Resource reconnaissance
- Fire reconnaissance
- Air tactical group supervision
- Water landings/floats or hull (helicopter)
- Single engine airplane water/retardant application

c) The following special use activities require periodic flight evaluations. A pilot must have completed a satisfactory flight evaluation within the preceding three-year cycle period (not to exceed 38 months) before performing the following activities:

- Animal darting, paint ball
- Animal eradication
- Animal gathering and capture
- Cargo letdown

External load - longline >50' (helicopter)
Handheld net gun
Low-level flight (airplane)
Toe-in, single-skid, and step-out landing (helicopter)
Vessel landings
Water/retardant application (except single-engine airplanes)
Wheel operations on unprepared landing areas (airplane)

d) The following special use activities require annual flight evaluations. A pilot must have completed a satisfactory flight evaluation within the preceding 14 months before performing the following activities:

Night vision goggles
Rappel
Short haul
Smoke jumping/paracargo

e) Confirmation of 14 CFR compliance may be accomplished via a quality assurance program of random sampling of the OAS-23, Aircraft Use Report, and verification of periodic flight evaluations and medical certifications.

f) Pilot qualification removal/suspension will be in accordance with current revocation procedures found in 351 DM 3, appendix 1.

B. Vendor Aircraft.

1) The bureau shall submit an OAS-20, Request for Rental Services, through its national aviation manager to the DOI AM Flight Coordination Center identifying the bureau's point-to-point aircraft requirements.

2) For new vendors, a business meeting shall be scheduled to discuss administrative procedures, safety expectations, and problem resolution processes with suggested attendance by the requesting bureau(s), interagency partners, vendor senior management, and the servicing DOI AM field office representative. This meeting is administrative in nature and is not for technical inspection purposes.

3) Aircraft meeting all administrative requirements will be issued an administrative approval document for a two-year period (not to exceed 26 months) which shall be carried in the aircraft and made available for review upon request.

C. Aviation Life Support Equipment.

1) The *Aviation Life Support Equipment (ALSE) Handbook* does not apply to vendor aircraft procured under an aircraft rental agreement (ARA) when conducting point-to-point (non-special use) activities and low risk special use activities, which are resource reconnaissance, fire reconnaissance, and air tactical group supervision.

2) For all other special use activities, the PPE requirements of the *ALSE Handbook* apply.

- 3) Aircraft used in offshore missions, such as Minerals Management Service aircraft, are not required to comply with the survival kit requirements of appendix 1 to the *ALSE Handbook*. These aircraft are required to meet the survival kit requirements of 14 CFR 135.167.

D. Quality Control.

1) Technical oversight and inspection is the responsibility of the FAA and is supported by quality control input from DOI users.

a) Incidents, hazards, and maintenance deficiencies shall be reported via the SAFECOM Incident Reporting System (www.safecom.gov) or telephonically to the servicing DOI AM field office for matters of urgency.

b) DOI AM will consolidate the information and, as appropriate, communicate it to the FAA office having responsibility for the vendor.

c) DOI AM may visit point-to-point vendors occasionally for quality control purposes.

2) Removal of vendors will be in accordance with current revocation procedures found in 351 DM 3, appendix 1.

/s/ Michael A. Martin

Associate Director