To: Geographic Area Incident Business Committees

From: Dave Burley, Chairperson, NWCG Interagency Incident Business Committee
      Justin Jager, Chair, NWCG Interagency Fire Unmanned Aircraft System Subcommittee

Subject: Unmanned Aircraft System (UAS) Incident Replacement Guidance

Currently, a fleet rate has not been established for agency or cooperator owned UAS. Most UAS and related support equipment are purchased and maintained at a local unit level with base funding. Therefore, unlike manned aircraft, a daily availability rate or applicable hourly flight rate for operations is not being assessed when a UAS is assigned to an incident.

In 2022, the NWCG Incident Business Committee (IBC) and Interagency Fire Unmanned Aircraft System Subcommittee (IFUASS) issued IBC Memo 22-05 stating UAS consumable items and some durable items in need of replacement could be attributed to the incident. The intent of the memo was to provide interim incident replacement guidance for Incident Business Advisors (INBA) and Agency Administrators until a “use rate” is established. There were minimal sideboards on what could be replaced which resulted in approval/purchases of items not ordinarily purchased or replaced with incident funds. The IBC and IFUASS identified a need for better parameters to be established.

The employees operating agency or cooperator owned UAS utilized on wildfire incidents may request authorization to use incident funds to replace items that are currently being considered consumable parts such as propellers, batteries, dragon eggs, and glycol. The established Property Loss or Damage Report (OF-289) process must be followed to obtain the approved resource order (S#) for replacement using the incident funds. However, if the identified consumable items do not need to be replaced due to damage (i.e., a crash or other equipment or system failure) on the incident the documentation for the OF-289 can be reduced to a detailed justification on an ICS-213 form of why replacement is needed. For example, in the case of batteries and propellers it would be important to include the UAS model, estimated age and replacement price. This will assist the INBA and/or the Agency Administrator with their decision. USB drives are a valid request to make sure data obtained by the UAS can be transferred and utilized.

Replacement of items not considered consumable will require full and complete documentation on the OF-289 to help the INBA or local office determine if the fire is liable. Items determined to be ‘normal wear and tear’ or because of negligence will not be approved. Support equipment such as generators or tires are often determined to be a wear and tear item. If circumstances on the fire did cause damage and it can be documented, then approvals for replacement may be appropriate. Major damage requiring unit replacement must follow the appropriate agency policy and process for replacement even if approved for replacement by the incident.

This information can be found at: https://www.nwcg.gov/committees/incident-business-committee/correspondence. For questions, please contact your IBC representative.