



November 24, 2020

Attention: Clint Cross
 USDA Forest Service
 Washington Office Fire and Aviation Management (FAM)
 1400 Independence Ave SW, Mailstop 1107
 Washington, DC 20250

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The National Association of State Foresters (NASF) is pleased to provide official comments on information collection related to the administration of the Federal Excess Personal Property (FEPP) and Firefighter Property (FFP) programs.

NASF represents the directors of the forestry agencies in all 50 states, eight U.S. territories, and the District of Columbia. State foresters deliver technical and financial assistance to private landowners for the conservation of more than two-thirds of the nation's forests. They also partner with federal land management agencies through cooperative agreements and Good Neighbor Authority to manage national forests and grasslands. All state forestry agencies share a common mission to protect America's forests and most have statutory responsibilities to provide wildland fire protection on all lands, public and private.

Collectively, state foresters are responsible for wildfire protection on more than 1.5 billion acres nationwide, including 1.1 billion acres in state and private ownership. With more people living in fire-prone landscapes close to wildlands, protecting state, private, and federal lands from wildfire has become increasingly difficult. To effectively manage wildfire, hotshot crews, firefighting equipment, and other valuable resources are shared across all land ownerships and between agencies, nationwide and year-round.

Through FEPP and FFP, state and local firefighting agencies acquire the property necessary to protect American homes and lives from wildfire, all while reducing the cost of wildfire protection to taxpayers. *Given the importance of these programs to state forestry agencies, NASF offers the following insights in response to the USDA Forest Service's request for comment:*

As to **"whether this collection of information is necessary for the stated purposes and the proper performance of the functions of the Agency, including whether the information will have practical or scientific utility:"**

The collection of FEPP/FFP acquisition details are necessary and beneficial for accurate property accounting and management. Information regarding property make, model, serial number,

acquisition value, location, condition, photos, and relevant comments are all collected for tracked FEPP and FFP property within the FEPMIS database. The collection of this information allows for proper identification of property by FEPP/FFP program management and property custodians. Additionally, property details help identify the current condition and age of equipment to determine life expectancy and value of repairs required to maintain operation. FEPP/FFP property details within the FEPMIS database, such as equipment type totals and frequency of acquisition, facilitate future acquisition planning and needs forecasting.

As to **“ways to enhance the quality, utility, and clarity of the information to be collected:”**

The majority of the property information on FEPP/FFP acquisitions is available and listed when the property is listed as available within GSAXcess (General Services Administration Excess website for FEPP) or RTD (Reutilization Transfer Donation website for excess Department of Defense Property in FFP). However, the property information in those systems rarely transfers into the FEPMIS system completely or accurately. For example, property details—including acquisition cost, make, model, serial numbers, and photos—do not transfer into FEPMIS once the property is acquired by a state forestry agency. In these instances, FEPP/FFP program management, forestry logistics officers, and/or property custodians must collect and manually enter the missing information when receipting for new acquisitions in FEPMIS.

Consistent transfer of property information from GSAXcess/RTD during acquisition into FEPMIS would enhance the quality, clarity, and accuracy of the information reported. The USDA Forest Service should also consider developing additional federal guidance for “automatic drop off of inventory” for expendable property that has been issued.

As to **“ways to minimize the burden of the collection of information on respondents, including the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology:”**

Minimizing the burden of property information collection requires the seamless transfer of information between federal systems, GSAXcess, RTD, and FEPMIS. Currently, FEPP program management, forestry logistics officers, and/or property custodians must manually enter all property details (make, model, serial, etc.) into FEPMIS for each acquisition line item before a state forestry agency can take possession. Automating the complete transfer of property information from GSAXcess and RTD into FEPMIS would lessen the burden of collection on state forestry agencies and allow for quicker receipting of new acquisitions.

Similarly, FEPP/FFP program management, forestry logistics officers, and/or property custodians must process acquisition documents, including GSA Transfer Orders/SF-122 forms/SF-123 forms (for FEPP acquisitions) and DoD1348-1A forms (for FFP acquisitions), manually by printing, scanning, and uploading them to FEPMIS. Like property details, these documents should transfer automatically into FEPMIS from GSAXcess/RTD to reduce filing burdens and ensure the capture of the property’s full history at acquisition.

NASF also offers the following recommendations related to these comments:

- Require a Department of Defense review of all property currently categorized as “controlled” to assure the designation is appropriate for national security or other concerns.

- Eliminate requirements for maintaining hard copy files on equipment acquired through FEPP/FFP. Currently, equipment documentation must be loaded into FEPMIS as well as maintained in a separate hard copy file.
- Update and improve the FEPMIS system to allow all data accomplishment processing, submittal, and file keeping to be done through FEPMIS. There should be no separate requirements for printing, emailing, or data management and retention.
- Reduce the frequency of federal inventories from every two years to every three years to minimize the burden of information collection. States will continue to maintain internal state inventory requirements.
- Provide updated training programs and guidance to states for FEPMIS, COGNUS, FEPP and FFP implementation.

We thank you for the opportunity to provide public comments and look forward to continuing our strong partnership in implementing these important programs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe A. Fox". The signature is stylized with a large, sweeping initial "J" and "F".

Joe Fox
NASF President
Arkansas State Forester