



July 31, 2020

FMAG Program
Public Assistance Division, 6th Floor, Rm 6NE-1006
Federal Emergency Management Agency
500 C Street, SW Washington, D.C. 20472

Re: Public Comment Period for the 2020 Fire Management Assistance Grant Program and Policy Guide (FMAGPPG)

The National Association of State Foresters (NASF) is pleased to provide comments on the above referenced Public Comment Period for the Federal Emergency Management Agency's (FEMA) 2020 Fire Management Assistance Grant Program and Policy Guide (FMAGPPG).

NASF represents the directors of the state forestry agencies in all 50 states, eight U.S. territories, and the District of Columbia. State Foresters deliver technical and financial assistance to private land owners, along with protection of forest health, water and wildfire for more than two-thirds of the nation's forests, as well as partner with federal agencies through authorities like Good Neighbor Authority in managing and protecting the nation's federal forests. While the duties of state agencies vary from state to state, all share common forest management and protection missions and most have statutory responsibilities to provide wildland fire protection on all lands, public and private.

NASF has concerns with the requirements of the FMAGPPG administrative provision, "Period of Performance" (POP), which establishes a three year period for grant recipients to submit eligible cost of an incident and have those costs processed, obligated, and closed out by FEMA. It is not unusual for a State agency to receive a bill from a federal agency, more than three years after the date of an incident. States are not able to calculate the complete cost of an incident and process those "true costs" until receiving a bill from federal agencies. We request written guidance in the FMAGPPG, this type of instance be considered eligible for an extension by FEMA.

We appreciate FEMA's effort to publish the FMAGPPG, combining the FMAG Guide and FMAG policy into a single document. Thank you for the opportunity to provide feedback and for your consideration of our comments.

Sincerely,

Greg Josten
NASF President
South Dakota State Foresters