U.S. Department of Agriculture

Office of Inspector General
Western Region

Audit Report

Follow-Up Review of Forest Service Security Over Aircraft and Aircraft Facilities

Report No. 08016-1-SF
SEPTEMBER 2003

UNITED STATES DEPARTMENT OF AGRICULTURE

OFFICE OF INSPECTOR GENERAL

Washington D.C. 20250

DATE: September 30, 2003

REPLY TO
ATTN OF: 08016-1-SF

SUBJECT: Follow-Up Review of Forest Service Security Over Aircraft and Aircraft Facilities

TO: Dale Bosworth
Chief
Forest Service

ATTN: Sandy Coleman
Audit Liaison

This report presents the results of our follow-up review of security over aircraft and aircraft facilities. The Forest Service's (FS) written response to the draft report is included as exhibit C with excerpts and the Office of Inspector General's position incorporated into the relevant sections of the report.

Based on the written response, we have accepted the FS' management decision for all the report recommendations, except for Recommendation No. 13. We will be able to accept your management decision for Recommendation No. 13 when you provide us with additional information as outlined in the OIG Position section of the report.

In accordance with Departmental Regulation 1720-1, please furnish a reply within 60 days describing the corrective action taken or planned and the timeframe for implementation of the recommendation for which management decision has not yet been reached. Please note that the regulation requires a management decision to be reached on all recommendations within a maximum of 6 months from report issuance. Follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the assistance your staff provided to our auditors during our review.

//S//

RICHARD D. LONG
Assistant Inspector General
for Audit

Attachment

Executive Summary

Follow-Up Review of Forest Service Security Over Aircraft and Aircraft Facilities

Results in Brief

As part of our ongoing review of departmental vulnerability to terrorism, we followed up on our prior audit of Forest Service (FS) Security Over Aircraft and Aircraft Facilities (Audit No. 08001-2-HQ, issued March 29, 2002). The purpose of our follow-up review was to determine the status of the prior audit's recommendations and to ensure that all aircraft acquired by the FS for firefighting purposes were adequately accounted for and secured. As was noted in our report from the prior audit, air tankers are vulnerable to theft and could be attractive to terrorists wishing to disperse biological or chemical agents in the air.

In December 2002, we visited the facilities of the seven contractors who maintain the air tankers that are under FS contract for firefighting purposes. We physically accounted for all 42 existing air tankers under the FS contract and concluded that they were adequately secured at the time of our visit. Exhibit A in this report provides the status of these aircraft. The majority of the air tankers were at the contractors' facilities undergoing heavy maintenance where critical components of the air tankers had been removed, making the air tankers inoperable.

We also revisited the seven FS air tanker bases reviewed in our prior audit and found that only two of the bases had added new security features since our last visit. However, the FS has made considerable progress towards completing the actions agreed upon during our last audit. The table on page iii provides the status of actions taken by the FS on the prior audit's recommendations. Most notably, the FS has completed its initial assessments of the air tanker bases to determine the security needs of the bases and is in the process of finalizing its National Aviation Security Policy. The National Aviation Security Policy will establish the minimum security standards based on risk level. This policy will also support the President's new advisory system and require additional security measures depending upon the level of alert.

The FS plans to conduct a final risk assessment at each air tanker base once it finalizes the National Aviation Security Policy. The final risk assessment will determine the appropriate security level required at each air tanker base. Specific security measures will be established for each security level. The FS also plans to develop a guide for completing the final assessments. From its initial risk assessments, the FS estimates that it will need an additional $30 million to implement the additional security measures at the bases.

Although the FS has made considerable progress to date in implementing the prior audit's recommendations, our current review identified additional issues

related to the prior audit where further actions are needed to strengthen security over aircraft and aircraft facilities. Our current review also identified an issue not previously reported involving the use and security of the C-130A and PB4Y-2 air tankers that the FS effectively grounded due to safety concerns. These aircraft are currently in the possession of private companies.

- The FS has not established adequate controls to account for Federal Excess Personal Property (FEPP) aircraft obtained by the States through the FS. FS had not ensured that the States had performed security assessments of the aircraft and drafted plans to secure them. FS managers did not know the actual number of aircraft on loan to the States or the actual location of the aircraft. FS managers had assigned the FEPP aircraft a low priority because these aircraft were smaller than the air tankers used by the FS. However, our review noted that 52 of the 276 FEPP aircraft currently on loan to States were also tanked aircraft capable of dispersing biological or chemical agents and should therefore be held to the same standard of security as the larger air tankers. The FS needs to require States with FEPP aircraft, particularly those with air tankers and tanked helicopters, to conduct security assessments at their aircraft facilities and develop security plans that meet the minimum security standards established in the FS' draft National Aviation Security Policy.

- The FS' draft National Aviation Security Policy does not require the FS Washington Office (WO) to review and approve the security level determinations made by the air tanker base managers or to review and approve the security plans that are based on those determinations. We believe a FS WO review is necessary to ensure that security level determinations made by the individual air tanker base managers are appropriate and comply with national guidelines. A review of the security plans at the air tanker bases will further ensure that the plan at each base is commensurate with the security level determined for that base. As part of the approval process, the FS WO also needs to certify that the security plan meets the standards established in the draft National Aviation Security Policy. To date, none of the managers at the air tanker bases visited had developed security plans for their bases.

- The FS has not formally notified all the appropriate Federal agencies of the need to monitor the use and security of air tankers in the possession of private companies that are no longer under the FS' jurisdiction or control. This is especially true of C-130A and PB4Y-2 air tankers that had been effectively grounded by the FS and no longer used for FS firefighting missions. Since the C-130As and PB4Y-2s had been obtained from the U.S. Department of Defense through the FS or on behalf of its firefighting mission, we believe that the FS should formally notify in writing other appropriate agencies of the need to ensure that these aircraft are

adequately secured and their future use restricted due to national security. Such action should involve coordination with the Federal Aviation Administration (FAA) and the U.S. Department of Homeland Security.

The following table shows the status of FS corrective actions on the recommendations from the prior OIG audit (Audit Report No. 08001-2-HQ) as of March 2003.

OIG Recommendation	Corrective Action Agreed To	Projected Completion Date	Status of Corrective Action	Corrective Action Completed
1. Assess the vulnerability of FS-owned and operated aircraft to theft and misuse.	Conduct vulnerability assessments.	6/30/02	USDA's Security Chief performed security assessments at 14 selected air tanker bases. FS also performed preliminary assessments at all of its air tanker bases. Final assessments will be performed once the FS finalizes its National Aviation Security Policy. The FS plans to develop a guide for completing the final assessments.	No
2. Provide guidance on aircraft security to partner State forestry agencies.	Work with the National Association of State Foresters to require the appropriate States to conduct a similar vulnerability survey and take the appropriate steps, as a result of the findings of the survey, to ensure the security of the FEPP aircraft.	9/30/02	Letter sent to State Foresters asking them to evaluate the security of their FEPP aircraft. Also sent checklist to State Foresters to assist them in evaluating the adequacy of the security over these aircraft.	Yes[1]
3. Develop security controls to minimize the risk that FS-owned and operated aircraft are used by terrorists or by individuals engaging in other criminal activity.	Notify FS Aviation Managers of need to heighten their attention to aircraft security. Take immediate actions to minimize the risk to aircraft.	9/12/01	Notified FS Aviation Managers of need to heighten their attention to aircraft security. Aviation Managers also instructed to take immediate actions to minimize the risk to aircraft.	Yes
4. Implement a strategy to ensure that aircraft and the public are adequately protected from potential misuse.	Develop an initial security plan and an interim strategy to prioritize efforts based upon areas of greatest vulnerabilities and damage potential. Develop a four-phased approach to address security concerns related to each priority.	Before 2003 Fire Season	Developed both an initial security plan and an interim strategy. Designated large air tankers and their associated facilities as its number one priority. Developed a four-phased approach to address security concerns related to each priority. Full implementation expected by start of 2003 fire season.	No
5. Develop minimum security standards for FS aircraft facilities and establish a timeframe for meeting the standards.	Work with the USDA Security Officer and a private contractor to develop security standards for FS aircraft facilities. Implement the necessary security measures as soon as funding is available.	4/15/02 7/1/02	Developed a National Aviation Security Policy that has yet to be finalized. A new timeframe for implementing the minimum security standards contained in the National Aviation Security Policy has not been established.	No

OIG Recommendation	Corrective Action Agreed To	Projected Completion Date	Status of Corrective Action	Corrective Action Completed
6. At those aircraft facilities where work was being conducted or planned under the National Fire Plan, assess the additional security features needed to meet the minimum security standards developed in Recommendation No. 5. Take the appropriate measures to ensure that these facilities meet those standards.	Apply standards developed under Recommendation No. 5 at aircraft facilities being constructed or modified under the National Fire Plan. The appropriate security measures will be in place at the completion of work.	When Project Completed	At the time of our review, work conducted under the National Fire Plan was completed at 5 of the 8 air tanker bases that were being constructed or modified under the National Fire Plan. As noted below, the final assessments to determine the additional security features needed at the bases will be conducted once the FS finalizes its National Aviation Security Policy.	No
7. At all remaining aircraft facilities, assess the additional security features needed to meet the minimum security standards developed in Recommendation No. 5. Also, quantify the cost to add these additional features and develop a plan of action for implementing the additional security features needed to meet the minimum security standards.	Develop a plan for implementing security standards at all bases that reflects funding availability and impact of that availability on completing the proposed work.	4/1/02	As noted in the response to Recommendation No. 5, the FS has yet to finalize its National Aviation Security Policy. Once finalized, the FS plans to conduct the final security assessment to determine the additional security features needed at each air tanker base. Based on the preliminary assessments already performed, the FS estimates that it will need an additional $30 million to implement the needed security measures. The timeframe for implementation will be contingent upon receiving the additional funding.	No
8. Ensure that the new air tanker contracts incorporate appropriate security provisions prior to award for the upcoming FY 2002 fire season.	During the preseason air tanker inspection process, will address security with companies and crewmembers, obtain commitment from industry to take proactive security measures, confirm air tanker crew awareness and compliance during preseason inspections, and add verification of field compliance with security measures to the duties of the Safety Training Assistance Teams deployed during the 2002 fire season.	12/31/02	FS has received commitment from the industry to take proactive security measures. Contract modifications have yet to be made and are contingent upon the completion of the National Aviation Security Policy.	No

[1] As noted in Finding No. 1 of this report, we concluded that the FS needs to also require that State Foresters with FEPP aircraft meet the minimum security standards contained in the FS' draft National Aviation Security Policy. This will require that the States with FEPP aircraft not only conduct security assessments at their aircraft facilities, but that they also develop security plans. The FS WO will also need to review the security assessment determinations and security plans for those aircraft facilities with FEPP aircraft to ensure that they meet the minimum security standards contained in the FS' draft National Aviation Security Policy.

Recommendations In Brief

We are recommending that the FS update its property records so they accurately reflect all FEPP aircraft on loan to States for firefighting purposes. The FS should require State Forestry units with FEPP aircraft to meet the minimum security standards contained in the FS' draft National Aviation Security Policy. This will require State Foresters to conduct security assessments at their aircraft facilities and develop security plans. The FS should then establish a separate database for these aircraft within its existing property management information system using the information from the FS property records and including information not only on the type and location of the aircraft and whether the aircraft has been tanked, but on the risk level assigned to the aircraft. Considering the sensitivity of this information, access to such a database should be limited to only authorized personnel.

We are also recommending that the Chief require the FS WO to review and approve the security level determinations made at FS air tanker bases and facilities with FEPP aircraft to ensure that the determinations are adequately supported and appropriate. The Chief should also require the FS WO to certify that the security plans at the FS and FEPP bases meet the minimum security standards established in the FS' draft National Aviation Security Policy.

Finally, we are recommending that the FS monitor the contractors' C-130As obtained through the Historic Aircraft Exchange Program that are still under FS jurisdiction to ensure the aircraft are adequately secured. In addition, the FS needs to inform both the FAA and the Department of Homeland Security about the PB4Y-2s and the remaining C-130As no longer under the FS' jurisdiction so that they are aware of the aircraft and can monitor the future use and security of them.

Agency Response

In its written response to the draft report, dated August 15, 2003, the FS generally concurred with all of our findings and recommendations. The complete written response is shown in exhibit C of the audit report.

OIG Position

Based on the FS' written response, OIG accepted the FS' management decision on all recommendations except for one. Additional FS actions are needed in order to reach management decision on the remaining recommendation.

Abbreviations Used In This Report

BLM	-	Department of Interior's Bureau of Land Management
CDF	-	California Department of Forestry
DOD	-	U.S. Department of Defense
DHS	-	U.S. Department of Homeland Security
DOJ	-	U.S. Department of Justice
FAA	-	Federal Aviation Administration
FEPP	-	Federal Excess Personal Property
FS	-	Forest Service
GSA	-	General Services Administration
OCFO	-	Office of Chief Financial Officer
OGC	-	Office of the General Counsel
OIG	-	Office of Inspector General
PMIS	-	Property Management Information System
USDA	-	United States Department of Agriculture
WO	-	Forest Service Washington Office

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Background and Objectives

Background

As was noted in the prior audit report (Audit Report No. 08001-2-HQ, dated March 2002), the Forest Service (FS) owns and operates about 44 aircraft, primarily small planes used as lead planes for fighting fires and other mission delivery functions. In addition, the FS uses about 800 other aircraft under contract to help in accomplishing the agency's mission. Of these, approximately 50 are large air tankers. Air tankers are airplanes modified with a tanking system to drop fire retardant chemicals in support of ground wildfire suppression operations. During the peak fire season, most of the large air tankers, which are capable of delivering up to 3,000 gallons of fire retardant at one time, are located at FS air tanker bases. During the off-season, fall and winter, air tankers are generally located at contractor facilities where they undergo maintenance prior to the commencement of the next fire season.

The large aircraft used in the FS firefighting mission are primarily converted military aircraft placed under the control of private contractors or State governments. Responsibility for the aircraft rests with the FS either through title or through contract for the aircraft's use in fighting forest fires.

- Private contractors control a fleet of 22 C-130As (illustrated in figure 4 on page 21) acquired from the U.S. Department of Defense (DOD) through the FS' Historic Aircraft Exchange Program established in 1988. The FS still has jurisdiction over 18 of these planes (see exhibit B). Two of the planes had crashed prior to 2003.

- Private contractors also control a fleet of 4 PB4Y-2s (illustrated in figure 5 on page 22) acquired from the DOD that transferred title to the aircraft to the contractors. However, because the planes have military value, the DOD has restricted their use by the contractors. The FS assumes an interest in these aircraft only during firefighting season.

- State firefighting agencies control a fleet of aircraft acquired from the DOD through the Federal Excess Personal Property (FEPP) program. These aircraft range in size from small planes and helicopters to S-2 air tankers (illustrated in figure 1 on page 5). Title to these aircraft remains with the FS, which is responsible for providing leadership to State agencies involved in managing State and local forested land.

During the 2002 fire season, two air tankers that were under the FS firefighting contract, a C-130A and a PB4Y-2, suffered wing losses while delivering retardant. Both air tankers ultimately crashed killing a total of five crewmembers. In response to these fatal aircraft accidents, the FS Chief and

Director of the U.S. Department of Interior's Bureau of Land Management (BLM) jointly established an independent, five-member Blue Ribbon Commission on August 15, 2002, made up of persons from private industry, academia, and public air safety organizations. The purpose of the Commission was to identify essential information for planning a safe and effective aviation program. The FS Chief and BLM Director also asked the Commission to identify weaknesses in the current aviation program, focusing on safety, operational effectiveness, costs, sustainability, and strategic guidance. Based on the Commission's findings, on December 6, 2002, the FS effectively grounded all remaining C-130As and PB4Y-2s under the National Air Tanker Contract. According to the FS, they have no intentions of allowing these planes to be used again for firefighting purposes and have therefore dropped them from the National Air Tanker Contract.

The FS currently has 73 air tanker bases that it uses in its wildland fire suppression operations. The facilities are strategically placed near forests and are used to house FS-owned aircraft as well as FS-contracted aircraft, such as the large air tankers used for aerial dispersal. Because forest fires are unpredictable, the network of FS air bases allows air tankers to move freely between forests and reload and refuel as needed.

The objective of our prior review was to assess FS security over aircraft and aircraft facilities as part of our ongoing review of departmental vulnerability to terrorism. To accomplish the prior review's objective, we visited 7 of the FS' 73 air tanker bases. We visited the bases in the fall and winter months, which are not normally part of the firefighting season, so the seven air tanker bases visited were selected primarily because they still had air tankers on site for firefighting purposes. We also contacted all seven of the contractors with air tankers under FS contract for firefighting purposes. Fieldwork for the prior review was conducted between October 2001 and January 2002.

Objectives

The objectives of this review were (1) to follow up on corrective actions implemented by the FS on our March 2002 audit (Audit No. 08001-2-HQ), and (2) to ensure that all air tankers and aircraft acquired by the FS for firefighting purposes were adequately accounted for and secured.

For this review, we revisited the 7 air tanker bases visited during the March 2002 audit. We also visited the facilities of the 7 contractors who maintain the air tankers that are under FS contract for firefighting purposes. The purpose of our visits was to identify any additional security features added since our last visits and to account for all 42 existing air tankers that were under the FS contract. See the Scope and Methodology section at the end of this report for details of our audit methodology.

Findings and Recommendations

Section 1. Actions Taken on the Prior Audit

The FS has made considerable progress towards completing agreed-upon actions from our prior audit report. For example, it has completed its initial assessments of the air tanker bases to determine the security needs of the bases and is in the process of finalizing its National Aviation Security Policy. The policy will contain the minimum security standards based on the risk level. The FS also plans to conduct a final risk assessment at each air tanker base once it finalizes the National Aviation Security Policy. The final risk assessment will determine the appropriate security level required for that air tanker base. Each security level will require implementation of specific security measures. The FS also plans to develop a guide for completing the final assessments. The table on page iii shows the status for each of the prior audit recommendations. Completion of the corrective actions on many of the recommendations is therefore contingent upon two things: completion of the National Aviation Security Policy containing the minimum security standards, and additional funding.

Except for two bases that we did not visit located within close proximity to the Winter Olympics held last winter in Salt Lake City, Utah, the FS has spent very little to upgrade security at its air tanker bases. Our unannounced revisits to seven air tanker bases disclosed that only two bases had added additional security features since our last visit. Both air tanker bases installed a security alarm system. One of the bases also installed security lighting and signs prohibiting trespassing. All available funding is currently being used to complete the risk assessments and to perform background checks on the staff working at the air tanker bases. The FS estimates that it will need an additional $30 million to implement the additional security measures determined by the initial risk assessments.

Although the FS has made considerable progress to date in implementing our recommendations from the prior audit, we concluded that the WO still needed to provide oversight over the security level determinations made by the air tanker managers and the security plans based on those determinations. More importantly, the FS needed to work with States in completing security assessments and plans and in strengthening security and accountability of FEPP air tankers loaned to States. Because the FS did not timely update its property records to adequately account for the FEPP air tankers loaned to States, FS inventory records did not reconcile with State records. As a result, the FS did not always know the location of the aircraft. Some of these aircraft are capable of delivering up to 1,200 gallons of fire retardant on a single mission.

Finding 1

Controls Needed To Account For and Secure All FEPP Aircraft On Loan To States, Particularly Air Tankers and Tanked Helicopters

The FS has not established adequate controls to account for the FEPP aircraft loaned to States and to ensure their security. In light of current budget and staffing levels, the FS has assigned the FEPP aircraft a low priority because they are generally smaller aircraft compared to the much larger C-130A air tankers used on FS firefighting missions under the National Air Tanker Contract. The FS assigned these larger air tankers and their associated facilities the highest priority. However, considering that 52 (or 19 percent) of the 276 FEPP aircraft currently on loan to States for firefighting purposes are also tanked aircraft capable of dispersing biological or chemical agents, we believe they should also be held to the same standard as the larger air tankers. In addition, these smaller aircraft are more vulnerable to theft and misuse since they are generally easier to handle and fly compared to the more complex C-130A aircraft. We concluded that States with FEPP aircraft, particularly those with air tankers and tanked helicopters, should be required to conduct security assessments at their aircraft facilities and develop security plans that meet the minimum security standards established in the FS' draft National Aviation Security Policy.

As of March 5, 2003, the FS had 276 FEPP aircraft on loan to 17 States, according to a FEPP aircraft inventory report provided to us by the FS WO. These consisted of 159 airplanes and 117 helicopters. Forty-five of the airplanes are S-2s that have been tanked to hold up to 1,200 gallons of fire retardant (see figure 1) and 7 of the helicopters are UH-1Hs equipped with tanking systems capable of holding up to 360 gallons of foam/water (see figure 2). Tanked aircraft make up 19 percent of the total FEPP aircraft on loan to the States. The remaining airplanes are smaller aircraft consisting of Aero Commanders, Beechcrafts, Cessnas, DeHavillands, Pipers, and Rockwells used to coordinate air tanker operations from the air or lead air tankers during the firefighting mission. The remaining helicopters are not tanked, but generally have large buckets attached underneath the aircraft that hold up to 324 gallons of foam/water.

Figure 1 – Picture From Associated Air Tanker Pilot's Web Site Showing A S-2 Air Tanker Dispersing Fire Retardant During Firefighting Operation

Figure 2 – California Department of Forestry Photo Showing A Tanked UH-1H Helicopter Dispersing Foam/Water During Firefighting Operation

In response to our March 2002 audit report, the FS agreed to work with the National Association of State Foresters to require the States to conduct security assessments at their aircraft facilities similar to the ones the FS is conducting at its air tanker bases (see the table on page iii). The FS also agreed to require the States to take the appropriate measures based on the results of their security assessments to ensure that the aircraft that was loaned to them as Federal Excess Personal Property for firefighting purposes was adequately secured. To date, the FS has only asked the States to evaluate the

security of their FEPP aircraft and has provided them with a checklist to assist in their evaluations.

a. **Security Plans Not Required**

We contacted the [ ] States possessing the largest number of FEPP aircraft: [ ] and [ ] These [ ] States combined possess over half the FEPP aircraft. [ ] also possesses [ ] of the S-2 air tankers. According to the State officials we spoke to, their FEPP aircraft are generally assigned to bases located at established airports. Helicopters could be stationed at county fire stations or on military bases. Only one of the three States contacted requires a security plan for its aircraft facilities. As is noted in Finding No. 2, the California Department of Forestry (CDF) currently requires security plans for all of its aircraft facilities due to the events of September 11, 2001. Although [ ] other [ ] States contacted did not require security plans, they had instructed field personnel at their aircraft facilities to implement certain security measures such as installing propeller locks on the aircraft and hidden switches that deactivate the aircraft's electrical systems.

To date, the FS has provided only minimal guidance to State Foresters regarding the security of their FEPP aircraft. Considering the significance of these aircraft on public health and safety if misused, particularly the air tankers and tanked helicopters, the FS should require State Foresters to meet the same security standards as the FS, as outlined in the FS' draft National Aviation Security Policy. State Foresters will be required to conduct security assessments at their aircraft facilities to determine the additional security features needed to meet the minimum security standards in the FS' draft National Aviation Security Policy and to develop security plans for their aircraft facilities. The FS should also provide State Foresters with a copy of the National Aviation Security Policy once it's finalized, as well as copies of the guide for conducting the security assessments and model security plans. Finally, the FS should review the State Foresters' security assessment determinations and security plans to ensure that the minimum security standards outlined in the FS' draft National Aviation Security Policy have been met.

b. **Lack of Accountability Over FEPP Aircraft**

The FS could not adequately account for the FEPP aircraft it loaned to States for firefighting purposes because the property management information system used by the FS to track the aircraft, known as PMIS, was not properly updated. For example, the State of Florida informed us

that it had eight additional helicopters that were not included in PMIS[1] and that five helicopters in PMIS had already been disposed of.[2] According to the State, it had timely informed the FS about the acquisition of the eight helicopters. The FS acknowledged that due to staff turnover, it was behind in updating the status of its FEPP aircraft in PMIS. Furthermore, the FS WO limited what the regions could enter into PMIS after October 2002 due to the annual financial statement audit. Specifically, regions were allowed to enter their FEPP property dispositions into PMIS, but not their acquisitions. Due to the sensitivity of the FEPP aircraft, particularly the tanked aircraft capable of dispersing biological and chemical agents, we believe the FS needs to make it a priority to timely enter these aircraft into PMIS to ensure that all such aircraft are properly accounted for.

Regions enter the FEPP aircraft into PMIS after the FS WO approves the transfer of the aircraft to the State and the General Services Administration (GSA) transfers title of the aircraft to the FS. An Excess Personal Property Transfer Order Form (Form SF-122) is used to document the transfer. When the State no longer needs the FEPP aircraft, and no other FEPP participant can be found to take it, the State disposes of the aircraft through GSA and notifies the region of the disposition. The region then eliminates the property from the PMIS.

We found that PMIS does not contain all pertinent information regarding the transfer and upgrade of FEPP aircraft. Specifically, PMIS does not show the date that the State actually took possession of the FEPP aircraft. Although FS policy[3] requires States to record on the Form SF-122 the date they received the FEPP aircraft, they do not always do so. Furthermore, FS regions were entering into PMIS from the Form SF-122 the date the FEPP aircraft was ordered, not the date it was received. When questioned, the FS WO FEPP Program Officer believed that both the States and FS regions were not fully aware of the FS policy. Also, when the States request FS permission to install tanking systems, the information is entered on a Form AD-112 (Report of Unserviceable, Lost, Stolen, Damaged Or Destroyed Property). However, the FS does not record this important information in PMIS.

As of March 5, 2003, the FS had 276 FEPP aircraft on loan to 17 States, according to a PMIS inventory report obtained from the FS WO FEPP

[1] Although the dates these aircraft were actually acquired by the State are not documented, the General Services Administration approved the transfer for one of the helicopters on December 13, 2000, and the remaining seven helicopters on July 11, 2001.
[2] According to the FS, three of the helicopters were disposed of on the following dates: November 8, 2001, December 21, 2001, and February 5, 2002. The remaining two helicopters were disposed of on September 24, 2002.
[3] Chapter 20 of the FEPP Desk Guide, dated May 2000.

Program Officer. To verify the accuracy of the report, we contacted the [ ] States with the largest number of FEPP aircraft [ ]. As was previously noted in this report, these [ ] States combined possessed over half the FEPP aircraft. We also obtained a copy of the PMIS reports from the corresponding FS regions where these [ ] States were located and compared them to the WO's PMIS report.

We found that PMIS did not accurately account for all of [ ] FEPP aircraft. In addition to the 13 helicopters previously mentioned, the FS region's PMIS report contained 7 helicopters that were not on the WO's PMIS report due to a coding error. The region had used code 1250 (fire stabilizing mechanisms) as opposed to code 1520 (rotary wing aircraft). According to the WO FEPP [ ], the regions did not always use the appropriate codes when entering their FEPP aircraft into PMIS. As a result, the WO's PMIS report did not always reconcile to the regions' PMIS reports because it did not contain the aircraft that the regions miscoded. Due to these errors, the FEPP [ ] tracked the FEPP aircraft using [ ] cuff record, which [ ] believed to be more accurate than PMIS. Because the regions used incorrect codes to enter their FEPP aircraft into PMIS, we were unable to determine the actual number of FEPP aircraft currently on loan to the States from the WO's PMIS report. We concluded that the FS WO needed to provide further guidance to the regions on the appropriate codes to use when entering the FEPP aircraft into PMIS.

Due to a heightened awareness of the controls over sensitive assets held by Government agencies, the FS needs to make it a priority to timely update its property records to adequately account for all FEPP aircraft, to include the actual acquisition date and whether the aircraft has been tanked. To accomplish this, the FS needs to inform States of the requirement to record the actual acquisition date on the Form SF-122 and require them to notify the FS when FEPP aircraft had been effectively tanked, so the information can be entered into PMIS. The FS also needs to instruct regions to enter into PMIS the actual acquisition date from the Form SF-122. Considering the sensitivity of this information, the FS also needs to establish within PMIS a separate database for its FEPP aircraft. Having a separate database within PMIS would enable the FS to more readily account for the FEPP aircraft and restrict access to this sensitive information. In addition to the type of aircraft, the date acquired, its location, and whether the aircraft has been tanked, the database should also include the level of risk assigned to the aircraft. All tanked aircraft should be assigned a high risk due to their potential use as a terrorist weapon. The purpose of the high risk designation is to track

those aircraft that are the most sensitive. Access to such a database should also be limited to only authorized personnel.

Recommendation No. 1

Require State Foresters with FEPP aircraft to meet the minimum security standards contained in the FS' draft National Aviation Security Policy.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed to work with State Foresters to evaluate application of the National Aviation Security Policy to FEPP aircraft. The FS will work with State Foresters to develop a timetable and schedule for this evaluation process to potentially incorporate FEPP aircraft with the National Aviation Security Policy. The estimated completion date for this action is April 30, 2004.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide the Office of Chief Financial Officer (OCFO) its determination on whether State Foresters will be required to meet the minimum security standards contained in the FS' draft National Aviation Security Policy.

Recommendation No. 2

Require State Foresters with FEPP aircraft to conduct security assessments at their aircraft facilities to determine the additional security features needed to meet the minimum security standards contained in the FS' draft National Aviation Security Policy.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that State Foresters should be responsible to conduct security assessments of aircraft facilities to determine additional security features that may be needed. The FS will work with State Foresters to ensure that security assessments are conducted. The estimated completion date for this action is April 30, 2004.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that State

Foresters with FEPP aircraft conducted the required security assessments at their aircraft facilities.

Recommendation No. 3

Require State Foresters with FEPP aircraft to develop security plans for their aircraft facilities. If security plans were already developed, require that the security plans meet the minimum security standards contained in the FS' draft National Aviation Security Policy. Once the FS develops its model security plans, provide State Foresters with a copy of them to use as a resource in developing their own plans.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that State Foresters with FEPP aircraft should develop security plans for their aircraft facilities. The FS will work with State Foresters to develop a timetable and schedule for requiring security plans to meet the appropriate sections of the National Aviation Security Policy. The estimated completion date for this action is April 30, 2004.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that State Foresters with FEPP aircraft developed security plans that met the appropriate sections of the FS' draft National Aviation Security Policy. The FS also needs to provide OCFO a copy of the model security plans that it provided to State Foresters.

Recommendation No. 4

Review the security assessment determinations and security plans for the aircraft facilities where FEPP aircraft are located to ensure that they meet the minimum security standards contained in the FS' draft National Aviation Security Policy.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS stated that it would work with State Foresters to develop a process to ensure appropriate review and approval of security assessment determinations and security plans. The estimated completion date for this action is April 30, 2004.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that it had reviewed and approved the security assessment determinations and security plans for those aircraft facilities with FEPP aircraft.

Recommendation No. 5

Instruct the FS WO to provide further guidance to the regions on the appropriate codes to use when entering their FEPP aircraft into PMIS.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that additional regional guidance would be beneficial. The FS stated that it would work with the Property, Plant, and Equipment Reconciliation Team to develop and provide the guidance to the regions. The estimated completion date for this action is December 31, 2003.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide OCFO a copy of the guidance it provided to regions on the appropriate codes to use when entering FEPP aircraft into PMIS.

Recommendation No. 6

Instruct the FS WO to inform the States of the requirement to record the actual acquisition date on the Form SF-122 and require them to notify the FS when FEPP aircraft had been effectively tanked, so the information can be entered into PMIS. Also instruct the FS regions to enter into PMIS the actual acquisition date from the Form SF-122.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed to provide guidance to the regions to ensure that the acquisition date of the FEPP aircraft is recorded on the Form SF-122. The FS WO staff will require the States to notify the regions when the FEPP aircraft are effectively tanked and require that FS personnel enter this information into the system. The FS will make the needed policy changes regarding FEPP by December 31, 2003.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide OCFO a copy of the guidance it provided to regions regarding the Form SF-122. The FS also needs to provide OCFO a copy of the new requirement for the States to report to the FS when their aircraft are tanked and for the FS to enter this information into its automated tracking system.

Recommendation No. 7

Due to the sensitive nature of the FEPP aircraft, make it a priority to timely update FS property records so that they accurately reflect all FEPP aircraft on loan to States for firefighting purposes, including their actual acquisition date and whether the aircraft has been tanked.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS stated that it would provide new guidance by March 31, 2004, to assure the timely update of property records for all FEPP aircraft.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide OCFO a copy of its new guidance for timely updating property records for FEPP aircraft.

Recommendation No. 8

Using the information from the FS property records, establish a restricted database within PMIS for the FEPP aircraft containing not only the type, acquisition date, location of the aircraft and whether the aircraft has been tanked, but also the level of risk assigned to the aircraft. Considering the sensitivity of this information, limit access to the database to only authorized personnel.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that keeping track of additional security related information regarding all FEPP aircraft would be beneficial. The FS has already developed FEPMIS, a restricted database, that can and will be modified to reflect the needed security information such as when an aircraft was tanked and the level of risk assigned. The FS will establish by policy that FEPMIS is its

source of information for purposes of aviation security. The FS will make the needed changes to FEPMIS by December 31, 2003.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that it made the needed changes to FEPMIS. The FS also needs to provide OCFO a copy of its new policy for FEPMIS.

Finding 2 FS WO Needs To Review and Approve Air Tanker Base Security Level Determinations and Security Plans

The draft National Aviation Security Policy does not currently require that the FS WO review and approve the security level determinations made by the air tanker base managers or that it review and approve their security plans. The FS WO does not believe it necessary to review the security level determinations made by the air tanker base managers because it intends to provide them with a guide on how to complete the assessments. It has not decided whether it will review the plans themselves. Without a WO review, there is no assurance that air tanker base managers will consistently comply with the guide and that security level determinations made by the air tanker base managers are appropriate.

In our March 2002 audit, we reported that the FS had not developed minimum standards for securing its air tanker bases nor had it assessed the additional security features needed to bring the bases up to standard. In response to our report, the FS agreed to develop the minimum standards and perform security assessments at its air tanker bases. Those standards are contained in the FS' draft National Aviation Security Policy. Prior to the development of its draft National Aviation Security Policy, the FS did not require that security plans be developed at its air tanker bases. As a result, none of the air tanker base managers, at the air tanker bases we visited during this audit, had developed security plans for their bases.

a. **Security Assessments**

The FS has completed initial assessments of its air tanker bases to determine the security needs of the bases. At the FS' request, USDA's Security Chief also conducted comprehensive security assessments at 14 selected FS air tanker bases. The USDA Security Chief reported the results of his reviews to the FS in March of 2002. The FS plans to conduct a final assessment at each air tanker base once it finalizes its National Aviation Security Policy.

The FS' draft National Aviation Security Policy establishes the following three security levels for air tanker bases with Level III being the highest: standard security (Level I), heightened security (Level II), and maximum security (Level III). According to the draft National Aviation Security Policy, in determining the appropriate security level for an air tanker base, the security assessment will consider vulnerability levels, probability of threat occurrence, and severity of event consequences. The final security assessment will determine what security level to utilize at a given air tanker base. Each security level will require implementation of certain security measures, commensurate with that security level.

The FS also plans to develop a guide for completing the final security assessments to ensure that they are uniformly conducted. According to the FS WO Aviation [ ], the guide will also contain guidance on how the assessments should be documented.

We noted that the draft National Aviation Security Policy does not currently require that air tanker base managers submit the results of their final security assessments to the FS WO for review and approval. The Aviation [ ] believed that the guide alone may be sufficient to ensure that the air tanker base managers make the appropriate decisions regarding the level of security needed at their air tanker bases.

We agree that the guide the FS WO plans to develop should provide adequate guidance to the air tanker base managers for performing and documenting their final security assessments and should also help to ensure consistency in coverage and approach. However, the guide would not necessarily ensure that the appropriate security levels are determined for each air tanker base. We believe that the FS WO needs to provide this assurance by reviewing and approving the security level determinations made by the air tanker base managers. To accomplish its review of the security level determinations, the guide that the FS WO develops needs to clearly state what documentation the air tanker base managers need to adequately support their security level determinations, how to document their security level determinations, and what air tanker base managers need to submit to the FS WO so that it can ultimately review and approve their security level determinations.

b. **Security Plans**

As was previously stated, none of the air tanker base managers at the air tanker bases visited had developed security plans for their bases because

they had not been required to do so. The FS' National Aviation Security Policy, which has yet to be finalized, will require air tanker base managers to develop security plans for their air tanker bases. The National Aviation Security Policy will also specify what air tanker base managers should include in their security plans depending on the security levels determined for their bases. The security plans will be developed after air tanker base managers complete their final security assessments to determine the appropriate security levels for the air tanker bases. According to the Aviation [ ], in order to assist air tanker base managers in developing their security plans, the FS WO will develop model security plans for each of the security levels described in the draft National Aviation Security Policy. This will help ensure uniformity in the development of the security plans.

According to the Aviation [ ], the FS WO has not decided whether it will review the security plans to ensure that they are properly developed and that the security programs at the air tanker bases are commensurate with the security levels determined for the air tanker bases. In light of recent concerns over the security of the aircraft housed at these facilities, we believe it paramount not only that the FS WO review the security plans to ensure that they were properly developed, but that it certify that the plans meet the standards established in the draft National Aviation Security Policy.

Furthermore, in California we noted that some of the air tanker bases visited were operated by the California Department of Forestry (CDF) either solely under an agreement with the FS or jointly with the FS. Due to the events of September 11, 2001, CDF currently requires security plans for all aircraft facilities it operates. The CDF Battalion Chief at one air tanker base that is operated jointly with the FS acknowledged the need to coordinate with the FS in developing a consolidated security plan that meets both their needs. We agree that the FS will need to coordinate with CDF when developing their security plans. For those air tanker bases operated solely by CDF, but where FS-owned or contracted aircraft reside, the FS will need to ensure that CDF's security plan meets the minimum security standards contained in the FS' draft National Aviation Security Policy. Other States may also require that security plans be developed; however, none of the other States we contacted required security plans for their aircraft facilities.

We concluded that the FS' process for improving security at its air tanker bases described in this finding could be further strengthened with increased oversight by the FS WO. FS WO review and approval of the security level determinations and security plans for the air tanker bases would ensure that

both meet the standards established in the draft National Aviation Security Policy.

Recommendation No. 9

Require the FS WO to review and approve the security level determinations made by the air tanker base managers to ensure that they are adequately supported and appropriate for the air tanker bases.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that an enhanced level of WO oversight of security level determinations would be appropriate. The FS will develop the needed procedures to provide FS WO review and approval of security level determinations. The estimated completion date for this action is December 31, 2003.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that the WO has reviewed and approved the security level determinations made by the air tanker base managers.

Recommendation No. 10

Ensure that the guide for conducting the final security assessments at the air tanker bases that the FS WO develops clearly states the following: (1) what documentation is needed to adequately support the security level determinations; (2) how the security level determinations should be documented; and (3) what documentation needs to be submitted to the FS WO so that it can ultimately review and approve the security level determinations.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that the guide for conducting security assessments should include detailed information about what documentation is required to (1) support the determination, (2) verify the methodology used, and (3) be submitted to the FS WO for review and approval. The FS will ensure by December 31, 2003, that detailed information regarding the above referenced documentation is contained in guides for conducting security assessments.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide OCFO a copy of its guide for conducting the final security assessments containing the OIG recommended information.

Recommendation No. 11

Instruct air tanker base managers to coordinate with the California Department of Forestry and other States as appropriate when developing their security plans.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that coordination with CDF and other state operators would enhance security efforts. The FS will work with CDF and other States to coordinate development and implementation of security plans. The FS will also adopt policy guidelines to ensure that air tanker base managers coordinate with CDF and other state operators regarding the development and implementation of security plans. The estimated completion date for this action is April 30, 2004.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that it had coordinated with the States in developing their security plans. The FS also needs to provide OCFO a copy of the policy guidelines that it adopted regarding the development and implementation of security plans.

Recommendation No. 12

Require the FS WO to review and approve the security plans developed by the air tanker base managers. As part of the approval process, the FS WO should also certify that the security plans meet the standards established in the draft National Aviation Security Policy.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that an enhanced level of WO oversight of security plans would be appropriate. The FS will develop the needed procedures to provide WO review and approval of security plans. The estimated completion date for this action is December 31, 2003.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that it had reviewed and approved the security plans. The FS also needs to provide OCFO a copy of its new procedures that provide for the review and approval of the security plans.

Our unannounced visits to 7 contractors' facilities in 6 States disclosed that each of the 42 existing air tankers that were under the FS contract were physically accounted for and adequately secured (see exhibit A). The majority of the air tankers were at the contractor's facilities undergoing heavy maintenance where critical components of the air tankers are removed, making the air tanker inoperable. For those air tankers that were still operable, the contractors had generally taken measures to secure [

] Figure 3 below shows a disabled DC-6 air tanker undergoing heavy maintenance.

Figure 3 – OIG Photo Showing A DC-6 Air Tanker Undergoing Heavy Maintenance At Contractor Facility

In response to fatal accidents involving air tankers, on August 15, 2002, the FS Chief and BLM Director jointly established an independent, five-member Blue Ribbon Commission to identify essential information for planning a safe and effective aviation program. Based on the Commission's findings, on December 6, 2002, the FS effectively grounded all remaining C-130As and PB4Y-2s under the National Air Tanker Contract. FS officials stated they have no intention of allowing these planes to be used again for firefighting purposes.

The grounding of the planes has created a dilemma concerning FS' role in monitoring the future use and security over these sensitive aircraft, especially since the planes were originally obtained from DOD to be used specifically for firefighting missions. FS monitoring of the aircraft was also challenged

when a financial institution repossessed two of the C-130As and resold them. FS does not know who the aircraft were sold to or the current status of the aircraft. Another three C-130As have similarly been repossessed. The FS had transferred the five C-130A aircraft to private air tanker operators under the Historic Aircraft Exchange Program it established in 1988.

Finding 3 — Actions Needed To Monitor the Future Use and Security of Air Tankers No Longer Employed On FS Firefighting Missions

The FS has not formally notified all the appropriate Federal agencies of the need to monitor air tankers that are no longer under the jurisdiction or control of the FS. The FS does not believe it has the authority to monitor the future use and security of these aircraft since they are no longer under the FS contract. FS' lack of action was also attributed, in part, to legal questions relating to the Government's continuing interest in the C-130A aircraft that air tanker contractors obtained through the FS' Historic Aircraft Exchange Program. Securing these type of aircraft is important, since these are large military transport aircraft that have been specially modified with large capacity tanks equipped for chemical air dispersal, a potential weapon that could be attractive to terrorists. The FS needs to formally notify the Federal Aviation Administration (FAA) and the U.S. Departments of Homeland Security and Justice of the need to monitor the future use of these large aircraft and to ensure their security.

a. **Status of C-130A Air Tankers**

The FS transferred 22 C-130A aircraft to private air tanker operators under the FS' Historic Aircraft Exchange Program. Exhibit B shows the current status of each of the 22 C-130A aircraft acquired through the Historic Aircraft Exchange Program.

Figure 4 – Photo From Associated Air Tanker Pilot's Web Site Showing A C-130A Air Tanker Dispersing Fire Retardant During Firefighting Operation

Of the 22 C-130As, only 13 are operational and 11 of these are ready for active use as air tankers (see exhibit B). The FS did not know the current status of the other two operational C-130As since a financing company had repossessed the aircraft from the air tanker contractor and subsequently sold the aircraft. Regarding the remaining 9 C-130As, 7 have been cannibalized for spare parts and 2 had crashed. Figure 4 above shows a photo of a C-130A air tanker on a firefighting operation. The FS only has control of these aircraft through contracts or agreements. These aircraft have limited FAA "Type" certificates that restrict their use to firefighting in the continental United States. The FS, by choosing not to contract these aircraft due to safety issues and recent accidents, has effectively grounded the aircraft. However, contractors unable to use them for the purpose they were acquired may decide to sell or use them for purposes not allowed in their "Type" certificate or for purposes not intended under the Historic Aircraft Exchange Program.

We concluded that the FS needs to monitor the contractors' C-130As that were obtained through the Historic Aircraft Exchange Program that are still under FS jurisdiction to ensure the aircraft are adequately secured (see exhibit B). The FS also needs to inform both FAA and the Department of Homeland Security about the remaining C-130As no longer under FS jurisdiction so that they are aware of the aircraft and can monitor the future use and security of the aircraft.

b. **Status of PB4Y-2 Air Tankers**

Only one of the air tanker contractors under FS contract has PB4Y-2 aircraft. Figure 5 shows a photo of a PB4Y-2 on a firefighting mission. All five of the contractor's PB4Y-2 aircraft were used during the 2002 fire season under the FS National Air Tanker Contract (see exhibit B). According to DOD, because these model aircraft were designed as bombers for military use only, they are included on the Defense Department's military munitions list. Aircraft on the munitions list have end use certificates that restrict both their use and disposition. The air tanker contractor's use of the PB4Y-2s is currently restricted to agriculture and pest control purposes.

As was previously noted in this report, the FS assumes an interest in the PB4Y-2 aircraft only during the firefighting season when the aircraft are under the FS National Air Tanker Contract. Because these aircraft were dropped from the FS contract and the FS therefore no longer has jurisdiction over the aircraft, the FS needs to inform both FAA and the U.S. Department of Homeland Security about the status of the aircraft so that they are aware of the aircraft and can monitor the future use and security of the aircraft.

Figure 5– Photo From Associated Air Tanker Pilot's Web Site Showing A PB4Y-2 Air Tanker Dispersing Fire Retardant During Firefighting Mission

In summary, the events of September 11, 2001, have increased the Government's need to monitor the use and security over these types of aircraft. Private contractors were able to obtain these types of aircraft from DOD only on behalf of the FS' firefighting mission. The FS therefore should take an active role in ensuring that the air tankers are secured and used only

for the restricted purposes for which they were originally obtained. The FS needs to coordinate with the FAA and the U.S. Department of Homeland Security in accomplishing this objective.

Recommendation No. 13

Monitor the contractors' C-130As obtained through the Historic Aircraft Exchange Program noted in exhibit B while still under FS jurisdiction to ensure the aircraft are adequately secured.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS stated that it did not feel it should assume responsibility to ensure the security of all C-130As obtained through the Historic Aircraft Exchange Program during periods when the aircraft are not under FS contract. The FS is currently considering returning the "Type" certificates for these aircraft because it does not feel it is able to provide these aircraft the level of monitoring and oversight that may be appropriate. The FS will consult with the Office of General Counsel (OGC) and the Department of Justice (DOJ) regarding potential jurisdictional and liability implications of aircraft in the Historic Aircraft Exchange Program. The estimated completion date for this action is March 31, 2004.

OIG Position.

To accept management decision on this recommendation, the FS needs to provide OIG a copy of any opinions it receives from OGC and DOJ on the matter as well as agree to take the actions specified in the opinions. If OGC and DOJ determine that the FS no longer has jurisdiction over the aircraft and is therefore no longer responsible for monitoring the future use and security of the aircraft, the FS would need to immediately notify both FAA and the U.S. Department of Homeland Security about the status of the aircraft so that they are aware of the aircraft and can monitor the future use and security of the aircraft.

Recommendation No. 14

Inform both the FAA and the U.S. Department of Homeland Security about the remaining C-130As and the PB4Y-2s no longer under FS jurisdiction noted in exhibit B so that they are aware of the aircraft and can monitor the future use and security of the aircraft.

Agency Response.

In its written response to the draft report, dated August 15, 2003, the FS agreed that it would be appropriate to provide the U.S. Department of Homeland Security (DHS) and FAA any updated information about the current operational status of all remaining C-130As and PB4Y-2s. The FS will work with the DHS and FAA to provide any information that it currently has available regarding C-130As, PB4Y-2s, or other aircraft of concern to DHS or FAA. The FS will also work with DHS and FAA to develop a Cooperative Agreement or Memorandum of Understanding regarding appropriate security tracking of C-130As, PB4Y-2s, or other aircraft of concern. The estimated completion date for this action is December 31, 2003.

OIG Position.

We accept the FS' management decision on this recommendation. For final action, the FS needs to provide documentation to OCFO showing that it notified DHS and FAA about the C-130As and PB4Y-2s.

Scope and Methodology

We conducted this review as part of our ongoing evaluation of homeland security issues at the FS. The purpose of our review was to follow up on corrective actions implemented by the FS on the prior audit (Audit No. 08001-2-HQ, issued March 29, 2002), and to ensure that all air tankers and aircraft acquired by the FS for firefighting purposes were adequately accounted for and secured.

To accomplish our overall objective, we revisited the 7 air tanker bases reviewed during the prior audit. We also visited the facilities of the 7 contractors who maintain the air tankers that are under FS contract for firefighting purposes. The purpose of our visits was to identify any additional security features added since our last visit and to account for all 42 existing air tankers that were employed under the FS contract during the 2002 fire season (see exhibit A).

Due to the recent action taken by the FS to effectively ground all C-130A and PB4Y-2 aircraft under the National Air Tanker Contract, we expanded our review to include those additional C-130As not currently under the FS contract that air tanker contractors received through the FS' Historic Aircraft Exchange Program established in 1988. Air tanker contractors received a total of 22 C-130As under the Historic Aircraft Exchange Program of which only 6 of them were employed under the FS contract during the 2002 fire season (see exhibit B.) Two of the C-130As had crashed prior to 2003.

We also reviewed the FEPP aircraft FS loaned to States for firefighting purposes. As of March 5, 2003, the FS had 276 FEPP aircraft on loan to 17 States of which 52 were tanked aircraft capable of dispersing biological or chemical agents. Tanked aircraft make up 19 percent of the total FEPP aircraft on loan to States. To determine the accuracy of the FS' property records pertaining to the States' FEPP aircraft, we contacted the [ ] States with the largest quantities of FEPP aircraft – [ ]. The [ ] states contacted possessed over half of the FEPP aircraft that was currently on loan to States for firefighting purposes and all of the aircraft that are currently tanked.

Finally, we attended the National Interagency Air Tanker Base Managers Workshop hosted by the FS on January 13-16, 2003, where security over the air tanker bases was discussed. Fieldwork was performed between November 2002 and March 2003.

In developing the findings in this report, we performed the following steps and procedures:

- We contacted the Office of the Chief Financial Officer and interviewed the FS WO Aviation [ ] to determine the status of FS corrective actions on the prior audit's recommendations.

- We interviewed the [ ] for the FS National Air Tanker Contract and reviewed the FS award schedule to determine those air tankers currently under FS contract.

- We reviewed the FS' draft National Aviation Security Policy to determine the minimum security standards established by the FS in response to one of our prior audit's recommendations.

- We reviewed documentation obtained from the FS WO Aviation [ ] [ ] showing what has been spent to date to upgrade security at the air tanker bases.

- We reviewed the report from the Department's Security Chief documenting the results of his security reviews at 14 FS air tanker bases.

- We interviewed the FS WO Assistant Director for Fire and Aviation Management to determine the status of the C-130A and PB4Y-2 aircraft permanently grounded. We also interviewed the FS WO Aviation [ ] [ ] to determine the FS' plans for monitoring the future use and security of these aircraft.

- We interviewed the Special Assistant to the Deputy Chief for Business Operations to determine the status of those C-130A aircraft permanently grounded that were obtained through the Historic Aircraft Exchange Program.

- We reviewed copies of the settlement agreements reached between the Government and some of the contractors that had obtained aircraft through the Historic Aircraft Exchange Program and interviewed a DOJ official to determine the status of any further litigation involving those air tanker contractors that received aircraft through the exchange program.

- We interviewed the FS WO FEPP [ ] and reviewed FS property records that the FEPP [ ] provided us showing the quantity of FEPP aircraft currently on loan to States for firefighting purposes.

- At the air tanker bases and contractor facilities visited, we interviewed those staff responsible for aircraft security. We also physically inspected each of the sites visited and performed a physical inventory of the aircraft currently at the site. We also obtained and reviewed the security plan for

the site if one had been developed. A questionnaire was developed to document the results of our security review at each site visited.

Our audit was conducted in accordance with generally accepted government auditing standards.

Exhibit A

Status of the 42 Existing Air Tankers Under FS Contract During 2002 Fire Season[1]

Tanker No.	Type Aircraft	Location	Use Status
[ ]	P3	Contractor Facility	Operational
[ ]	SP2H	Contractor Facility	Operational
[ ]	P2V	Contractor Facility	Operational
[ ]	P2V	Contractor Facility	Operational
[ ]	P2V	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P2V	Contractor Facility	Operational
[ ]	DC-4	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-4	Contractor Facility	Undergoing Heavy Maintenance
[ ]	SP2H	Contractor Facility	Undergoing Heavy Maintenance
[ ]	SP2H	Contractor Facility	Operational
[ ]	P3	Contractor Facility	Operational
[ ]	P3	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P3	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P3	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P3	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P3	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P3	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P2V	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P2V	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-7	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-7	Contractor Facility	Undergoing Heavy Maintenance
[ ]	C-130A	Contractor Facility	Undergoing Heavy Maintenance
[ ]	C-130A	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-4	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-7	Contractor Facility	Operational
[ ]	C-130A	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-6	Contractor Facility	Undergoing Heavy Maintenance
[ ]	P2V	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-4	Contractor Facility	Operational
[ ]	PB4Y-2	Contractor Facility	Undergoing Heavy Maintenance
[ ]	PB4Y-2	Contractor Facility	Operational
[ ]	PB4Y-2	Contractor Facility	Operational
[ ]	PB4Y-2	Contractor Facility	Undergoing Heavy Maintenance
[ ]	C-130	Contractor Facility	Operational
[ ]	C-130	Contractor Facility	Operational
[ ]	P2V	Contractor Facility	Operational
[ ]	P2V	Contractor Facility	Operational
[ ]	DC-4	FS Air Tanker Base	Undergoing Repairs
[ ]	DC-4	Contractor Facility	New Avionics Being Installed
[ ]	DC-4	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-4	Contractor Facility	Undergoing Heavy Maintenance
[ ]	DC-4	Contractor Facility	Operational

[1] In December 2002, we physically accounted for all 42 existing air tankers under the FS contract and concluded that they were adequately secured at the time of our visit.

Exhibit B

Current Status of All C-130A and PB4Y-2 Aircraft Permanently Grounded By FS

Serial No.	Tanker No.	Type Aircraft	Aircraft Acquired Through Historic Aircraft Exchange Program	Use Status	Aircraft Operational	Aircraft Used During 2002 Fire Season	Aircraft Still Under FS Jurisdiction
[ ]	[ ]	C-130A	Yes	Tanked	Yes	No[1]	Yes
[ ]	[ ]	C-130A	Yes	Tanked	Yes	No[1]	Yes
[ ]	[ ]	C-130A	Yes	Tanked	Yes	Yes	Yes
[ ]		C-130A	Yes	Parts[2]	No	No	Yes
[ ]	[ ]	C-130A	Yes	Crashed[3]	No	Yes	N/A
[ ]	[ ]	C-130A	Yes	Crashed	No	No	N/A
[ ]		C-130A	Yes	Parts[2]	No	No	Yes
[ ]		C-130A	Yes	Parts[2]	No	No	Yes
[ ]		C-130A	Yes	Parts[2]	No	No	Yes
[ ]	[ ]	C-130A	Yes	Tanked	Yes	Yes	Yes
[ ]	[ ]	C-130A	Yes	Tanked	Yes	No[1]	Yes
[ ]	[ ]	C-130A	Yes	Parts[2]	No	No	Yes
[ ]	[ ]	C-130A	Yes	Parts[2]	No	No	Yes
[ ]		C-130A	Yes	Unknown[4]	Yes	No	No
[ ]	[ ]	C-130A	Yes	Tanked	Yes	Yes	Yes
[ ]	[ ]	C-130A	Yes	Tanked	Yes	Yes	Yes
[ ]		C-130A	Yes	Unknown[4]	Yes	No	No
[ ]	[ ]	C-130A	Yes	Tanked	Yes	Yes	Yes
[ ]		C-130A	Yes	Parts[2]	No	No	Yes
[ ]	[ ]	C-130A	Yes	Tanked	Yes	No[1]	Yes
[ ]	[ ]	C-130A	Yes	Tanked	Yes	No[1]	Yes
[ ]		C-130A	Yes	Tanked	Yes	No[1]	Yes
	[ ]	PB4Y-2	No	Tanked	Yes	Yes	No
	[ ]	PB4Y-2	No	Tanked	Yes	Yes	No
	[ ]	PB4Y-2	No	Tanked	Yes	Yes	No
	[ ]	PB4Y-2	No	Tanked	Yes	Yes	No
	[ ]	PB4Y-2	No	Crashed[3]	No	Yes	N/A

[1] The air tanker contractor who has this aircraft currently does not have any air tankers under the FS National Air Tanker Contract. Three of the air tanker contractor's aircraft (T-81, T-83 and T-88) are leased from a bank that repossessed them from another air tanker contractor.
[2] Aircraft cannibalized for spare parts.
[3] Air tanker crashed during the 2002 fire season.
[4] Air tanker was repossessed by financing company. Financing company subsequently sold the aircraft. FS does not know who the aircraft was sold to or the current status of the aircraft.

Exhibit C

FS Response To Draft Report

United States Department of Agriculture | Forest Service | Washington Office | 14th & Independence SW, P.O. Box 96090, Washington, DC 20090-6090

File Code: 1430 Date: AUG 15 2003
Route To:

Subject: Forest Service Response to Official Draft Report for Office of Inspector General (OIG) Audit Report No. 08016-1-SF; Follow-up Review of FS Security Over Aircraft and Aircraft Facilities

To: Richard D. Long
Assistant Inspector General for Audit
Office of the Inspector General

Thank you for the opportunity to review and comment on the draft OIG Audit Report No. 08601-1-SF. The Forest Service generally concurs with the findings and recommendations. Agency responses to the audit recommendations are enclosed. If you have any questions, please contact Sandy Coleman, OIG/GAO Audit Liaison, on (703) 605-4940.

for MARY S. MATIELLA
Chief Financial Officer, Deputy Chief for Budget and Finance

Enclosure

cc: Timothy Melchert

Caring for the Land and Serving People

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United States Department of Agriculture
Forest Service (FS)

Office of Inspector General (OIG) Audit Report No. 08016-1-SF
Follow-up Review of Forest Service Security Over Aircraft and Aircraft Facilities
June 2003

FS Response to Draft Audit

OIG Recommendation No. 1: Require State Foresters with FEPP aircraft to meet the minimum security standards contained in the FS draft National Aviation Security Policy.

FS Response to Recommendation No. 1: The FS agrees to work with State Foresters to evaluate application of the National Aviation Security Policy to FEPP aircraft. The FS will work with State Foresters to develop a timetable and schedule for this evaluation process to potentially incorporate FEPP aircraft within the National Aviation Security Policy. Specific milestones include: FS and State Foresters schedule evaluative meetings by 10/31/03 and establish a timetable and schedule for implementation of needed security policy changes by April 30, 2004.

Estimated Completion Date: April 30, 2004

OIG Recommendation No. 2: Require State Foresters with FEPP aircraft to conduct security assessments at their aircraft facilities to determine the additional security features needed to meet the minimum security standards contained in the FS draft National Aviation Security Policy.

FS Response to Recommendation No. 2: The FS agrees that State Foresters should be responsible to conduct security assessments of aircraft facilities to determine additional security features that may be needed. The FS will work with State Foresters to ensure that security assessments are conducted. Specific milestones include: FS and State Foresters schedule evaluative meetings by 10/31/03 and establish a timetable and schedule for implementation of needed security policy changes by April 30, 2004.

Estimated Completion Date: April 30, 2004

OIG Recommendation No. 3: Require State Foresters with FEPP aircraft to develop security plans for their aircraft facilities. If security plans were already developed, require that the security plans meet the minimum security standards contained in the FS draft National Aviation Security Policy. Once the FS develops its model security plans, provide State Foresters with a copy of them to use as resources in developing their own plans.

FS Response to Recommendation No. 3: The FS agrees that State Foresters with FEPP aircraft should develop security plans for their aircraft facilities. The FS will work with State Foresters to develop a timetable and schedule for requiring security plans to meet the appropriate sections of the National Aviation Security Policy. Specific milestones include: FS and State Foresters schedule evaluative meetings by 10/31/03 and establish a timetable and schedule for implementation of needed security policy changes by April 30, 2004.

Estimated Completion Date: April 30, 2004

OIG Recommendation No. 4: Review the security assessment determinations and security plans for the aircraft facilities where FEPP aircraft are located to ensure that they meet the minimum security standards contained in the FS draft National Aviation Security Policy.

FS Response to Recommendation No. 4: The FS will work with State Foresters to develop a process to ensure appropriate review and approval of security assessment determinations and security plans. The FS will work with State Foresters to develop a timetable and schedule for requiring security plans to meet the appropriate sections of the National Aviation Security Policy. Specific milestones include: FS and State Foresters schedule evaluative meetings by 10/31/03 and establish a timetable and schedule for implementation of needed security policy changes by April 30, 2004.

Estimated Completion Date: April 30, 2004

OIG Recommendation No. 5: Instruct the FS WO to provide further guidance to the Regions on the appropriate codes to use when entering their FEPP aircraft into PMIS.

FS Response to Recommendation No. 5: The FS agrees that additional regional guidance would be beneficial and will work with the Property, Plant & Equipment Reconciliation Team to develop and provide this guidance to the Regions by December 31, 2003.

Estimated Completion Date: December 31, 2003

OIG Recommendation No. 6: Require that the actual acquisition date of the FEPP aircraft be recorded on the Form SF-122 and that the States notify the Regions when FEPP aircraft have been effectively tanked so the Regions can enter this data into PMIS.

FS Response to Recommendation No. 6: The FS agrees to provide guidance to the Regions to ensure that the acquisition date of the FEPP aircraft is recorded on the form SF-122. The FS WO staff will require the States to notify the Regions when the FEPP aircraft are effectively tanked

and require that FS personnel enter this information into the system. The FS will make needed policy changes regarding FEPP by December 31, 2003

Estimated Completion Date: December 31, 2003

OIG Recommendation No. 7: Due to the sensitive nature of the FEPP aircraft, make it a priority to timely update FS property records so that they accurately reflect all FEPP aircraft on loan to States for firefighting purposes, including their actual acquisition date and whether the aircraft has been tanked.

FS Response to Recommendation No. 7: The FS concurs with the recommendation. The FS will provide new guidance to assure the timely update of property records for **all** FEPP aircraft by March 31, 2004.

Estimated Completion Date: March 31, 2004

OIG Recommendation No. 8: Using the information from the FS property records, establish a restricted database within PMIS for the FEPP aircraft containing, not only the type, acquisition date, location of the aircraft, and whether the aircraft has been tanked, but also the level of risk assigned to the aircraft. Considering the sensitivity of this information, limit access to the database to only authorized personnel.

FS Response to Recommendation No. 8: The FS agrees that keeping track of additional security related information regarding all FEPP aircraft would be beneficial.
The FS has already developed FEPMIS, a restricted database, that can and will be modified to reflect the needed security information such as when an aircraft was tanked and the level of risk assigned. The FS will establish by policy that FEPMIS is our source of information for purposes of aviation security. The FS will make needed changes to FEPMIS by December 31, 2003.

Estimated Completion Date: December 31, 2003

OIG Recommendation No. 9: Require the FS Washington Office (WO) to review and approve the security level determinations made by the air tanker base managers to ensure that they are adequately supported and appropriate for the air tanker bases.

FS Response to Recommendation No. 9: The FS agrees that at an enhanced level of WO oversight of security level determinations would be appropriate and the FS will develop the needed procedures to provide FS WO review and approval of security level determinations. The FS will make needed changes to FS WO oversight of security level determinations by December 31, 2003.

Estimated Completion Date: December 31, 2003

OIG Recommendation No. 10: Ensure that the guide for conducting the final security assessments at the air tanker bases that the FS WO develops clearly states the following: (1) what documentation is needed to adequately support the security level determinations; (2) how the security level determinations should be documented; and (3) what documentation needs to be submitted to the FS WO so that it can ultimately review and approve the security level determinations.

FS Response to Recommendation No. 10: The FS agrees that the guide for conducting security assessments should include detailed information about what documentation is required to (1) support the determination, (2) verify the methodology used, and (3) be submitted to the FS WO for review and approval. The FS will ensure that detailed information regarding the above referenced documentation is contained in guides for conducting security assessments by December 31, 2003.

Estimated Completion Date: December 31, 2003

OIG Recommendation No. 11: Instruct air tanker base managers to coordinate with the California Department of Forestry (CDF) and other States as appropriate when developing their security plans.

FS Response to Recommendation No. 11: The FS agrees that coordination with CDF and other state operators will enhance security efforts and the FS will work with CDF and other States to coordinate development and implementation of security plans. The FS will adopt policy guidelines by April 30, 2004 to ensure that airtanker base managers coordinate with CDF and other state operators regarding the development and implementation of security plans.

Estimated Completion Date: April 30, 2004

OIG Recommendation No. 12: Require the FS WO to review and approve the security plans developed by the air tanker base managers. As part of the approval process, the FS WO should also certify that the security plans meet the standards established in the draft National Aviation Security Policy.

FS Response to Recommendation No. 12: The FS agrees that at an enhanced level of WO oversight of security plans would be appropriate and the FS will develop the needed procedures to provide WO review and approval of security plans. The FS will make needed changes to WO oversight of security plans by December 31, 2003.

Estimated Completion Date: December 31, 2003

OIG Recommendation No. 13: Monitor the contractors C-130As obtained through the Historic Aircraft Exchange Program noted in Exhibit B that are still under FS jurisdiction to ensure the aircraft are adequately secured.

FS Response to Recommendation No. 13: The FS does not feel that the FS should assume responsibility to ensure the security of all C-130As obtained through the Historic Aircraft Exchange Program during periods when the aircraft are not under FS contract. The FS is currently considering returning the Type certificates for these aircraft because the FS does not feel that we are able to provide these aircraft the level of monitoring and oversight that may be appropriate. The FS will consult with the Office of General Counsel and the Department of Justice regarding potential jurisdictional and liability implications of aircraft in the Historic Aircraft Exchange Program.

Estimated Completion Date: March 31, 2004

OIG Recommendation No. 14: Inform both the FAA and the U.S. Department of Homeland Security (DHS) about the remaining C-130As and the PB4Y-2s no longer under FS jurisdiction noted in Exhibit B so that they are aware of the aircraft and can monitor the future use and security of the aircraft.

FS Response to Recommendation No. 14: The FS agrees that it is appropriate to provide DHS and FAA any updated information about the current operational status of all remaining C-130As and PB4Y-2s. The FS will work with the DHS and FAA to provide any information that the FS currently has available regarding C-130As, PB4Y-2s, or other aircraft of concern to DHS or FAA. The FS will work with DHS and FAA to develop a Cooperative Agreement or Memorandum of Understanding regarding appropriate security tracking of C-130As, PB4Y-2s, or other aircraft of concern by December 31, 2003.

Estimated Completion Date: December 31, 2003

Informational copies of this report have been distributed to:

Office of the Chief Financial Officer
Planning and Accountability Division
Director (1)
General Accounting Office (2)