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Executive Summary

The Office of Restoration and Damage Assessment's (ORDA) 2025–2029 Strategic Plan builds on 33 years of leading successful restoration of natural resources under Interior trusteeship (and services provided by those natural resources) following contaminant releases. The ORDA's Strategic Plan's primary purposes are to (1) lay out the ORDA's vision for continuing the important restoration work to be inclusive of underserved communities and with the challenges of accelerating climate change; (2) provide direction for the office's organization and outlining its role within the Department of the Interior (Interior) and the larger restoration community; and (3) identify ambitious goals that embody a number of Interior's initiatives and guiding principles by using science and evidenced-based information to guide decisions, supporting Tribal nations, and engaging in partnerships internally and externally.

This Strategic Plan directly supports Interior's vision to conserve, protect, manage, and restore land, water, and resources for the benefit of all Americans, now and for future generations. It also aligns with Interior's FY 2022-2026 Strategic Plan, in particular the goals of promoting well-being, equity, and justice for Tribes, American Indians, Alaska Natives, Native Hawaiians, and insular communities and helping to conserve, protect, manage and restore the Nation's natural and cultural resources. Restoration activities are essential for conserving fish, wildlife, and their habitats, and ultimately fuel local economies, generating millions of dollars and hundreds of year-long jobs. The ORDA's activities also embody several of Interior's initiatives and guiding principles by using science and evidenced-based information to guide our decisions, support Tribal nations, and engage in partnerships internally and externally.



Figure 1. Texas City Y Oil Spill in April 2024. Photo Credit: U.S. Coast Guard

Acronym/Definition List

AS-PMB Assistant Secretary-Policy, Management, and Budget

BIA Bureau of Indian Affairs

BLM Bureau of Land Management

BOR Bureau of Reclamation

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CWA Clean Water Act

CFA Case Funding Application

DARTS Damage Assessment and Restoration Tracking System

FWS Fish and Wildlife Service

GIS Geographic Information System

IOSP Inland Oil Spill Preparedness

Interior Department of the Interior

NCTC National Conservation Training Center

NEPA National Environmental Policy Act

NGOs Non-governmental Organizations

NPS National Park Service

NRDAR Natural Resource Damage Assessment and Restoration

OEPC Office of Environmental Policy and Compliance

OPA Oil Pollution Act

ORDA The Office of Restoration and Damage Assessment

PLQ Priority Learning Question

PPA Office of Policy Analysis

PRP Potentially Responsible Party

RSU Restoration Support Unit

SOL Office of the Solicitor

SURPA System Unit Resource Protection Act

TSG Technical Support Group

USGS United States Geological Survey

Introduction

The ORDA Strategic Plan provides a framework for the ORDA to support and provide guidance to practitioners who implement Natural Resource Damage Assessment and Restoration (NRDAR) activities. The ORDA will measure and track progress on how well it is meeting the strategic goals, strategic objectives, and performance goals in this Plan. This Plan will assist the ORDA in meeting Interior's strategic goals and the ORDA's legislative responsibilities. The Plan lays out the ORDA's four strategic goals and accompanying objectives and performance measures, which will be tracked to ensure success.

History

Since its inception in 1998 as a Departmental Program, the ORDA (and its predecessor the NRDAR Program Office/Restoration Program) has led and coordinated the efforts of six bureaus and two other offices within Interior to accomplish its mission. NRDAR is an integrated program drawing upon the interdisciplinary strengths of various bureaus and offices. This integration entails considerable interaction with other components throughout Interior that manage various other habitat and species conservation and restoration programs. Program management and oversight, budget allocations, legal guidance and oversight, science and research, and economic guidance and oversight are vital to the NRDAR Program.

NRDAR is authorized and guided by laws, regulations, executive orders, and departmental policies and informed by legal precedent through court decisions. Through these statutory and other legal foundations, Interior and other trustees of federal, state, and Tribal natural resources are authorized to act on behalf of the public to restore natural resources including the ecosystem services provided by those natural resources harmed through releases of hazardous substances or through the discharge of oil. Working under these various authorities and regulations, including the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), Oil Pollution Act of 1990 (OPA), and the Clean Water Act (CWA), the ORDA provides vision, policy, guidance, advice, recommendations, and coordination related to Interior's responsibilities under the applicable NRDAR regulations.

Interior's NRDAR Program was first established when Congress passed the Interior and Related Agencies Appropriation Act of 1992, which created the Department of the Interior Restoration Fund and the Program within the US Fish and Wildlife Service (FWS). In 1997, the NRDAR Program was moved to the Assistant Secretary-Policy, Management, and Budget (AS-PMB) and was comprised of the following components: a Senior Executive Service Program Manager; an Executive Board with senior executives from involved bureaus and offices; establishment of the Work Group, comprised of working level contacts from the involved bureaus and offices; full time solicitor support; a fund manager, to be located in the FWS; regional coordinators and a regulation writer housed in the Office of Environmental Policy and Compliance (OEPC); economist support from the Office of Policy Analysis (PPA); and an internal process for resolving disputes. The Program Manager officially started in November 1997 and was responsible for coordinating with the Deputy Assistant Secretaries Group and Executive Board designates to

develop a Departmental Manual chapter on NRDAR authorities and responsibilities; approve allocation of funds for Program Management functions in FY 1998; and manage the first FY 1998 NRDAR Fund allocation.

Several structural changes have occurred since the Program's inception beginning with the fund manager's position moving from the FWS to the DOI Program Office in 1998. The "regulation writer" position originally housed in OEPC was moved under the Program Office in 2002 and was redefined as the Deputy Program Manager for Restoration. The Departmental regional staff positions working on NRDAR-related issues which were originally established under OEPC, were subsequently moved under the direct supervision of the Program Office in 2008. These positions were transferred to Washington, DC and are now part of the Operations Unit. In addition, in 2005 the Restoration Support Unit (RSU) was established under the supervision of the Program Office to support and assist Authorized Officials in implementing restoration. In 2010, the status of NRDAR was upgraded from Program to Office and the name was changed to the Office of Restoration and Damage Assessment. Finally, in 2015, the Inland Oil Spill Preparedness (IOSP) Program was added to the ORDA's the list of activities resulting in the current makeup and structure of what the Office is today.



Restoration Program Management Team in June 1999 at NCTC.



NRDAR Technical Support Group (TSG) and FWS Regional Coordinators in May 2024 in Hadley, MA.

1980

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

1990

Oil Pollution Act (OPA) Clean Water Act (CWA)

1992

Congress passes the Interior and Related Agencies Appropriation Act DOI NRDAR Program first established, including:

- Department of the Interior Restoration Fund
- US Fish and Wildlife Service (FWS) NRDAR Program

1997

The Program moved under the Assistant Secretary- Policy, Management, and Budget (AS-PMB)

Nov. 1997 The Program Manager officially starts, responsible for:

- coordinating with the Deputy Assistant Secretaries Group and Executive Board designates to develop a Departmental Manual chapter on NRDAR authorities and responsibilities
- approve allocation of funds for Program Management functions in FY 1998
- manage the first FY 1998 NRDAR Fund allocation

1998

Inception in 1998 as a Departmental Program, the ORDA

• Fund managers position moved from FWA to the Program Office

2002

The "regulation writer" position originally housed in OEPC moved under the Program Office in 2002 and was redefined as the Deputy Program Manager for Restoration

2005

The Restoration Support Unit (RSU) was established under the supervision of the Program Office to support and assist Authorized Officials in implementing restoration

2008

The regional coordinators, originally established under OEPC, were moved under the direct supervision of the Program Office and since 2008, assist in the day-today operations of the Office

2010

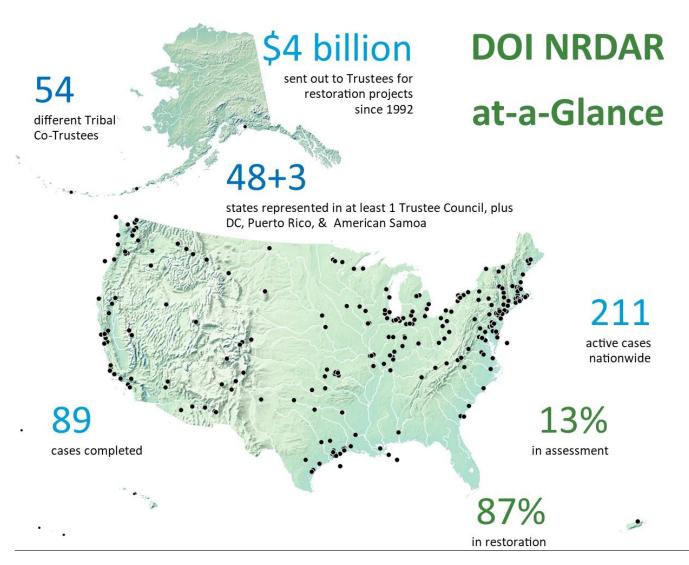
The status of NRDAR was upgraded from Program to Office and the name was changed to the Office of Restoration and Damage Assessment

2015

The Inland Oil Spill Preparedness (IOSP) Program was added to the list of activities

Mission

The primary mission of the ORDA is to restore natural resources injured as a result of oil spills or hazardous substance releases into the environment. The ORDA accomplishes this by supporting Interior's NRDAR case teams by developing and issuing policy, guidance, and regulations (43 CFR Part 11); providing funding and technical support; coordinating with Interior bureaus and offices, other Federal agencies, states, Tribes, non-governmental organizations (NGOs), and industry; and performing oversight and evaluation duties of the NRDAR Program.



^{*}Note: values based on publicly available information in DARTS.

Vision — Restoring what was lost

The ORDA is committed to the goal of "Restoring what was lost" when injuries occur to Interior's jurisdictional natural resources and the services provided by those resources, as well as the lost Tribal cultural use of those natural resources, after an oil spill or a hazardous substance release. The ORDA strives to be the Federal government's go-to leader for restoration through three approaches:

Policy Issuance

 Revising regulations, developing regulatory, scientific, and economic guidance, as well as any guidance in response to any changes in legislation and other legal matters.

Scientific and Economic Developments

 Advancing emerging economic methods and tools, techniques for assessment, restoration, and monitoring, as well as applied research.

Financial/Administrative Functions

 Overseeing the NRDAR Fund, practitioner training, development and maintenance of the Damage Assessment and Restoration Tracking System (DARTS).

To implement the ORDA's vision and achieve the mission, the ORDA is comprised of three internal units (Figure 2):

- Operations Unit manages damage assessment technical assistance and funding, oversees the ORDA communications strategy, the IOSP Program, and the office information-management system, DARTS, and provides training opportunities and webinars for NRDAR practitioners.
- Restoration Support Unit provides technical support to case teams working on assessment of and restoration for natural resource injuries and lost use of those resources and related activities, organizes and provides training opportunities for NRDAR practitioners.
- 3. Budget Unit oversees and manages the distribution of funds deposited from settlements and agreements (including investments) in the NRDAR Fund at the direction of involved Interior offices and bureaus, and/or jointly with federal, state, and Tribal trustees, as well as funding for NRDAR initiatives and activities related to assessment and restoration.



Figure 2. Venn diagram illustrating the relationships and shared responsibilities for the ORDA's major functions among its three internal units.

Organization

The ORDA's leadership and management team consists of a Director, Deputy Director, NRDAR Fund Manager, Assistant Office Director for Restoration, and Assistant Office Director for Operations. The figure below provides an organizational overview of the office as well as its connection to the AS-PMB, the NRDAR Executive Committee, and the NRDAR Technical Support Group (TSG) (Figure 3).

The ORDA plays a central role in coordinating actions of Interior's six bureaus and two offices engaged in implementing NRDAR responsibilities, which is accomplished alongside the NRDAR Executive Committee and the NRDAR TSG. A key coordinating responsibility is developing policies that are consistent with all Interior's entities that are implementing NRDAR.

The NRDAR Executive Committee consists of representatives at the assistant director level for Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), Bureau of Reclamation (BOR), FWS, and National Park Service (NPS), as well as a Deputy Associate Solicitor. The NRDAR Executive Committee provides program oversight, resolves policy and budget allocation issues, advises the ORDA Director on strategic direction, approves annual funding for NRDAR cases, and acts on recommendations forwarded by the Director.

The TSG includes representatives from the six bureaus: BIA, BLM, BOR, FWS, NPS, United States Geological Survey (USGS), and two offices: PPA and Office of the Solicitor (SOL) who are responsible for communicating program policy and technical information to their respective bureaus and offices. This structure ensures that bureau and office needs are incorporated into funding recommendations and ensures integrated coordination and implementation of NRDAR policies across Interior.

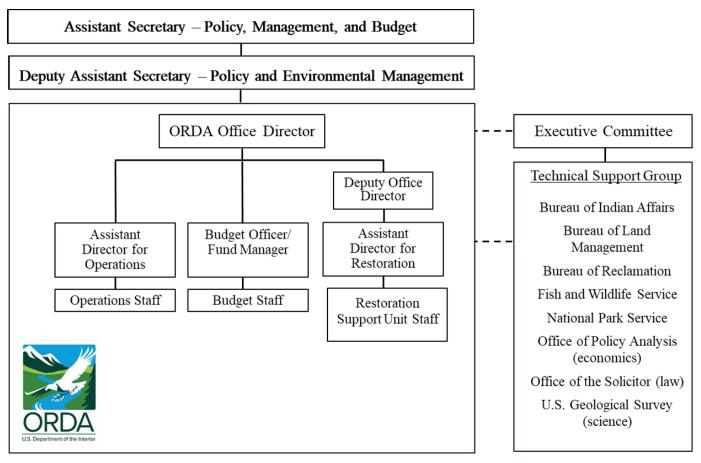


Figure 3. Organizational structure of the ORDA and alignment under Interior's Assistant Secretary for Policy, Management, and Budget.

Responsibilities of the ORDA

The Operations Unit has the primary responsibility for managing and coordinating each funding process [Case Funding Application (CFA) and IOSP], including holding the monthly and annual meetings of the TSG and IOSP workgroups. For the CFA process, the ORDA uses evaluation criteria to select cases for funding that link to broader Interior priorities, are likely to achieve successful restoration, and consider relevant legal, administrative, and technical factors. For the IOSP Program, the ORDA coordinates with the OEPC to review funding proposals submitted annually by the bureaus for projects related to planning and preparing Interior for inland oil spills. Proposals are reviewed by a bureau workgroup with final funding selections made jointly by the Directors of the ORDA and the OEPC.

Additionally, the Operations Unit manages DARTS, which tracks information on all of Interior's NRDAR cases; oversees the office's communications and social media presence; coordinates training and webinar opportunities; and performs various other administrative functions, such as compliance with Section 508 of the Rehabilitation Act of 1973 and records management.

The RSU provides support to case teams in a myriad of ways from restoration planning to project implementation to assistance with the National Environmental Policy Act (NEPA) compliance requirements and monitoring of restoration projects. Funded through the office's annual appropriations, this support is provided at no cost to case teams. On an annual basis, the RSU typically supports over 30 cases with activities ranging from writing restoration plans to participating in Trustee Council calls and meetings. The RSU may also provide support to case teams during the assessment phase of a case, including developing information on which to scale restoration benefits and costs of potential restoration techniques.

The Budget Unit ensures approved funding is provided to Interior case teams for damage assessment activities and inland oil spill preparedness projects. Settlement dollars, monies provided to Trustees through a Funding and Participation Agreement, interest earned, and recoveries are housed in the Interior NRDAR Fund and released through withdrawal requests in DARTS according to directions and appropriate documentation provided by case-specific Trustee Councils or Authorized Officials. The Budget Unit coordinates all Congressional appropriation budget submissions for the office and ensures compliance with all financial regulations and policy.

While organizationally separate units, all three teams often intersect and rely on mutual internal cooperation and teamwork to accomplish their functions. Similarly, the ORDA's activities rely on coordination and collaboration with the bureau TSG members, regional and field staff, as well as co-trustees (other federal agencies, states, and Tribes), industry partners, and NGOs.

ORDA Strategic Plan Framework

This Strategic Plan provides a framework (see Figure 4) for the ORDA to accomplish its mission. The ORDA will measure and track progress on how well it is meeting the strategic goals, strategic objectives, and performance goals in this Plan through its accompanying internal Implementation Plan. Tracking the ORDA's strategic goals will assist the ORDA in meeting Interior's strategic goals and the ORDA's legislative and regulatory responsibilities.

This Strategic Plan aligns with Interior's FY 2022 – FY 2026 Strategic Plan. The ORDA's activities generally contribute to all four of Interior's Strategic Goals, and most specifically fit with Strategic Goal 2: Conserve, Protect, Manage, and Restore Natural and Cultural Resources in the Face of Climate Change and Other Stressors. The ORDA's activities also embody several of the Interior's initiatives and guiding principles by using science and evidence-based information to guide its decisions, supporting Tribal nations, and engaging in partnerships internally and externally.



Implementation Plan

Figure 4. The ORDA Strategic Plan Framework.

Strategic Goals, Strategic Objectives, and Performance Goals



JURISDICTIONAL RESOURCES, HABITATS, AND SERVICES ARE RESTORED AFTER BEING IMPACTED BY AN OIL SPILL OR HAZARDOUS-SUBSTANCE RELEASE.

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APPROPRIATE AND RELEVANT DATA, SCIENCE, AND FINANCIAL INFORMATION ARE USED TO AID NRDAR PRACTITIONERS.



FEDERAL, STATE, AND TRIBAL NRDAR PRACTITIONERS (I.E., NRDAR COMMUNITY) ARE PREPARED AND TRAINED.



PARTNERSHIPS INCREASE ON-THE GROUND-RESTORATION FOR THE NRDAR COMMUNITY.

Photo Credits: 1. Coeur d'Alene Tribe, ID, 2. NPS, 3. ORDA, 4. Port of Everett

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STRATEGIC GOAL 1: JURISDICTIONAL RESOURCES, HABITATS, AND SERVICES ARE RESTORED AFTER BEING IMPACTED BY AN OIL SPILL OR HAZARDOUS-SUBSTANCE RELEASE.

Across the country each year, oil spills and hazardous substance releases impact natural resources and their services belonging to, managed by, controlled by, held in trust by, or appertaining to Interior. While not every incident results in a NRDAR case being pursued, for the ones that are, it is critical to Interior that our practitioners are prepared and ready. Furthermore, once a NRDAR claim has been resolved, timely preparation of restoration and monitoring plans are key to achieving restoration.

<u>Strategic Objective 1.1:</u> Resources, habitats, and services move toward achieving a desired state¹ following restoration.

- Performance Goal 1.1.1: Jurisdictional resources and services are restored per restoration plans.
 - Performance Measure 1.1.1.1: By 2030, 100% of RSU-supported NRDAR restoration plans have defined and measurable goals and objectives that relate to moving resources, habitats, and services toward achieving a desired state.
 - Performance Measure 1.1.1.2: By 2030, 100% of RSU-supported NRDAR projects measure key indicators that relate to the goals and objectives as defined in the restoration plans and relate to moving resources, habitats, and services toward achieving a desired state.
- Performance Goal 1.1.2: Restoration projects have a long-term management and monitoring plan in place which leads to maintenance and protection of resources and services.
 - Performance Measure 1.1.2.1: By 2030, 100% of RSU-supported NRDAR projects have longterm management and monitoring plans in place.

Learning Question (PLQ 2.1.2): What defines the quality of a successfully functioning ecosystem (from Interior's FY 2022 – FY 2026 <u>Learning Agenda</u>)?

<u>Strategic Objective 1.2:</u> The ORDA ensures adequate capacity and expertise to plan and prepare for, and to characterize the effects of, oil spills and hazardous substance releases.

- Performance Goal 1.2.1: Interior contributes relevant resource protection information to Area Contingency Plans.
 - Performance Measure 1.2.1.1: By 2030, the ORDA provides information for all (100%) area contingency plans that are being developed or updated.
- Performance Goal 1.2.2: Interior staff are trained and able to coordinate with responders.
 - Performance Measure 1.2.2.1: By 2030, the ORDA provides training opportunities to all (100%) staff working on spill response.

¹ Desired state is being defined as baseline. Per the definitions in 43 CFR 11.14(e) – Baseline means the condition or conditions that would have existed but for the release of the hazardous substance.

STRATEGIC GOAL 2: APPROPRIATE AND RELEVANT DATA, SCIENCE, AND FINANCIAL INFORMATION ARE USED TO AID NRDAR PRACTITIONERS.

A strong NRDAR claim is built on the use of data and scientific information throughout the NRDAR process. Having the most up to date information and systems available for both practitioners and the Potentially Responsible Party (PRP) community to utilize will help ensure claims can be successfully resolved and restoration can occur.

Strategic Objective 2.1: The damage assessment process and settlements are cost-effective and timely.

- Performance Goal 2.1.1: Cases continually progress through the NRDAR process.
 - Performance Measure 2.1.1.1: By 2030, as determined by an annual review, 100% of cases in which Interior is involved continuously progress through the applicable NRDAR process.
- Performance Goal 2.1.2: Potentially Responsible Parties are made aware of their responsibilities and invited to cooperate in damage assessment and restoration activities.
 - Performance Measure 2.1.2.1: By 2026, PRPs are invited to participate in 100% of NRDAR cases initiated that include Interior.

<u>Strategic Objective 2.2:</u> The ORDA facilitates Trustee Council use of peer-reviewed science and NRDAR data in its decision-making and throughout the NRDAR process.

- Performance Goal 2.2.1: An Information Management System is available to track assessment and restoration outcomes.
 - Performance Measure 2.2.1.1: By 2027, modernized DARTS allows tracking of case milestones on 100% of active cases.
- Performance Goal 2.2.2: The ORDA provides funding to scientific research efforts that will facilitate NRDAR case assessment and restoration activities.
 - Performance Measure 2.2.2.1: By 2026, the ORDA establishes funding criteria and guidance for research and scientific research funding priorities.
- Performance Goal 2.2.3: The ORDA helps fill critical scientific data gaps experienced by NRDAR cases.
 - Performance Measure 2.2.3.1: By 2030, 100% of case managers use one or more of ORDA-funded tools and studies.

Strategic Objective 2.3: The ORDA's financial systems are fully functional and operational.

- Performance Goal 2.3.1: Funding transfers are processed and completed monthly.
 - Performance Measure: 2.3.1.1: By 2026, 100% of requests are processed, within one month of receipt.
- Performance Goal 2.3.2: Annual allocations are distributed accurately to Interior case teams.
 - Performance Measure: 2.3.2.1: By 2025, the Budget Unit distributes 100% of annual allocations error-free.
- Performance Goal 2.3.3: Financial information is available and transparent to practitioners.
 - Performance Measure: 2.3.3.1: By 2027, case financial statements are posted for case managers to access in real-time.

STRATEGIC GOAL 3: FEDERAL, STATE, AND TRIBAL NRDAR PRACTITIONERS (I.E., NRDAR COMMUNITY) ARE PREPARED AND TRAINED.

Being a NRDAR practitioner requires not just technical skills in one's specialty, but also skills that that run the gamut – from case management and budgetary expertise to negotiation and conflict management. Having a diverse and well-trained workforce can help to ensure that all needs are included when working on NRDAR cases.

<u>Strategic Objective 3.1:</u> The ORDA has the capacity and technical skills available to provide training related to assessment, restoration, and monitoring.

- Performance Goal 3.1.1: The ORDA has sufficient staffing and funding capacity for training.
 - Performance Measure 3.1.1.1: By 2030, the ORDA meets 100% of training requests to support practitioners.
- Performance Goal 3.1.2: The ORDA staff recruitment efforts are broadened to be representative of the various areas of the Nation.
 - Performance Measure 3.1.2.1: By 2030, 100% of the ORDA job vacancies include applicants with broad representation of the various areas of the Nation.

<u>Strategic Objective 3.2:</u> The NRDAR community is trained in methods to conduct assessment, restoration, and monitoring, as well as financial and investment options.

- Performance Goal 3.2.1: ORDA-sponsored webinars, workshops, mentorship program, and conferences are provided.
 - Performance Measure 3.2.1.1: By 2026, the ORDA provides monthly training webinars, and biennial workshops.
 - Performance Measure 3.2.1.2: By 2026, the ORDA contributes to at least four organized sessions and hosts booths at key toxicology and restoration conferences.
 - Performance Measure 3.2.1.3: By 2026, 100% of the ORDA sponsored events provide surveys and other evaluation tools to improve training methods and content.

Learning Question: Are the materials utilized by practitioners assisting in achieving restoration goals?

Learning Question: What other options are available to the ORDA to support case teams and address NRDAR practitioner capacity issues?

Learning Question: What technology can be used to address capacity issues (e.g., ChatGPT to assist with search capabilities, generating reports, running analytics, writing Assessment Plans, Restoration Plans, Translation services)?

STRATEGIC GOAL 4: PARTNERSHIPS INCREASE ON-THE-GROUND RESTORATION FOR THE NRDAR COMMUNITY.

The success of the NRDAR program is encapsulated by the idea of the *whole is greater than the sum of its parts*. Having the ability to partner with other entities to leverage resources can ultimately lead to more on the ground restoration being accomplished.

<u>Strategic Objective 4.1:</u> The ORDA facilitates the establishment of partnerships among Trustee Councils and other entities and programs working on restoration to leverage resources and increase on-the-ground restoration.

- Performance Goal 4.1.1: The ORDA provides funding and resources to other entities.
 - Performance Measure 4.1.1.1: By 2030, funding for on-the-ground restoration increases by 10% for RSU-assisted cases as the result of new partnerships entered into and use of match or in-kind funding on NRDAR cases compared to 2024.



Figure 5. Seabird nesting habitat restoration on Ano Nuevo Island, CA.

Monitoring, Evaluation, and Reporting

The success of the ORDA's Strategic Plan will depend on our ability to monitor, track, report and learn as we work to achieve our goals and objectives in the Strategic Plan. On an annual basis, our office will review its performance in meeting its objectives, goals, and measures. We will conduct data-driven reviews on our case docket to ensure the accuracy of the data collected as well as review the operations of the NRDAR Fund. When needed, we will course correct if the strategy is not showing intended impacts. Goals and measures will be reevaluated to confirm the office has the correct implementation strategy in place. The results of these reviews and checks will be reviewed by staff and leadership to determine progress on the Strategic Plan. At the annual meeting of the NRDAR Executive Committee meeting each December, a report out will be given on our progress of reaching our goals.

Conclusion

For over the past thirty years, the ORDA (in all its incarnations) has been committed to the vision of "Restoring what was lost". By working with the NRDAR community (Interior, other federal and state agencies, Tribes, industry, NGOs), we strive to ensure that future generations will have the ability to enjoy natural resources and the services that they provide for years to come. Through the implementation of this Strategic Plan, the ORDA is committed to achieving its goals and objectives and meeting the natural resource needs of Interior, our co-trustees, and the public now and for always.



Figure 6. Shenandoah National Park, Tanners Ridge Dedication Ceremony, May 2023. Photo Credit: Erinn Shirley, FWS.