

Department of the Interior
Natural Resource Damage Assessment and Restoration
Advisory Committee Meeting
July 26-27, 2006

The third meeting of the DOI Natural Resource Damage Assessment and Restoration Advisory Committee was convened at 8:47 AM on July 26, 2006, in the Rio Grande Room of Building 67, on the Denver Federal Center, Denver, Colorado. Vice-Chair Charlie Wooley called the meeting to order and welcomed all the Committee members and members of the public. The Designated Federal Officer (DFO), Mr. Frank DeLuise, added his welcome, thanked everyone for their participation, and asked everyone present to introduce themselves by name, title, and affiliation.

In accordance with the provisions of Public Law 92-463, the meeting was open to the public from the time it was convened each day until adjournment at the end of each day.

Committee Members Present:

Frank DeLuise	Lisa Gover
Charlie Wooley	Shannon Work
John Carlucci	William Bresnick
William Brighton	Patricia Casano
Linda Burlington	Barbara Goldsmith
Nancy King	Barry Hartman
Sharmian White	J. Craig Potter
Richard Seiler	Michael Smith
Mark Shurtleff	Ralph Stahl
Dale Young	William Clements

Laurence Groner (officially designated alternate for Alex Beehler)

Department of the Interior FACA Committee Staff Present:

Steve Glomb, Assistant Program Manager for Restoration
David Morrow, Assistant Program Manager for Operations
Robin Burr, NRDAR Regional Coordinator, Philadelphia
Barbara Schmalz, NRDAR Restoration Support Unit Field Liaison /Coordinator, Denver

Opening Comments

Vice-Chair Wooley reviewed the meeting agenda and advised that the order of the subcommittee reports would be Subcommittee 3, 2, 1, and 4 (the order in which the subcommittees submitted their meeting PowerPoint presentations). He specified that each subcommittee would present their PowerPoint presentation, during which the Committee could discuss the issues raised by the subcommittee (e.g., ask questions, seek clarification of issues, etc.). At the conclusion of each subcommittee's report, the Committee would provide their input regarding the next steps of that subcommittee. Subsequent to the Committee's discussion, the members of the public who had indicated

they wished to provide comments pertaining to that subcommittee's report would be given the opportunity to do so.

In his opening remarks, DFO DeLuise acknowledged that the Subcommittees, and thereby the Committee, appeared to be on schedule and that, from his perspective, the issues and discussions of the subcommittees were very interesting and thought provoking. He also reviewed the Committee membership, advising that Mr. Mark Shurtleff, the State of Utah Attorney General, had been designated as a Committee member and was serving as a member of Subcommittee 2; and that Ms. Lynelle Hanson, who had taken another job, had withdrawn from the Committee. DFO DeLuise concluded by offering the Committee members a sincere thank you from the Secretary of the Interior, the Deputy Secretary, the Assistant Secretary for Policy, Management, and Budget, the Deputy Assistant Secretary for Policy and International Affairs, and from himself for all of their efforts related to the successful completion of this Committee's charter.

Subcommittee 3 – Report and Discussion

Subcommittee questions: *Should DOI revise the CERCLA NRD Regulations to encourage compensating for interim losses with additional restoration projects (in lieu of monetary damages)? How should project-based interim loss compensation claims be calculated?*

Subcommittee 3 coordinators John Carlucci and Pat Casano reviewed the issue assigned to the Subcommittee (see the Subcommittee 3 PowerPoint presentation at <http://restoration.doi.gov/faca.html>), the Subcommittee conference calls and the meeting of the Subcommittee, and advised that Committee member Shannon Work had graciously agreed to participate in their deliberations in order to provide a Tribal perspective and input regarding Tribal treaty rights.

Mr. Carlucci and Ms. Casano noted that the Subcommittee has slightly revised the first part of the Subcommittee's question. They also noted that, because the discussion of compensatory values in the current Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Natural Resource Damage Assessment and Restoration (NRDAR) regulation assumes that injury and causation have been determined, therefore the fundamental question Trustees have to deal with is whether to accept specific projects rather than a specific amount of money as compensation. Thus, the Subcommittee thinks that the issue before Trustees is the need to determine how to value a resource loss relative to the cost of a restoration project. The challenge Trustees must meet is to provide compensation to the public from the time the injury occurred to the time the resource is fully restored (i.e., interim losses). To facilitate this process, the Subcommittee thinks that Trustees should have the option on whether to accept projects as compensation for interim losses, regardless of whether the cost of the projects is less than the monetary value of the resource loss. The focus, first and foremost, needs to be appropriate resource restoration, which will foster settlements. Both the Grand Calumet River and the Fox River/Green Bay cases were cited as examples. In the Grand Calumet

settlement the cash settlement was tied to specific projects; in the Fox River settlements different projects were considered and some of those projects were implemented.

A Committee member asked whether the Subcommittee had discussed the circumstance of when a responsible party may have paid more than the value of the resource loss; Mr. Carlucci advised that specific circumstance had not been discussed to which Ms. Casano added that if the primary restoration is larger than the value of the loss, that 'excess' might cover some of the compensatory value.

The Committee agreed that the current regulation provides a good framework for the assessment and recovery of interim losses. The Committee also agreed with the Subcommittee that the trustees should have the option to accept projects as compensation and thought that the current regulation is flexible enough to allow for the acceptance of projects (or funds) as compensation for those losses.

Ms. Casano reviewed the language in the current regulation regarding compensable value, and Mr. Carlucci summarized the Subcommittee's identified pros and cons of revising the regulation (see the Subcommittee 3 PowerPoint presentation). The Committee recommendation was that there does not appear to be problems with using the current regulation. However, the suggestion was made that the Subcommittee attempt to address the perception of obstacles to the use of project-based approaches. The Committee agreed that any recommended changes to the regulation and/or any recommended guidance by the Subcommittee should not modify the current focus on services, baseline, causation, and the use of reliable assessment methods.

As to the second part of the Subcommittee's question (i.e., how should project-based interim loss compensation claims be calculated), Ms. Casano advised that the Subcommittee members had different views on the reliability of the identified methods in a litigation context. Mr. Carlucci noted that the issue seems to be gradients of reliability and that; perhaps, the question is 'Are the identified methods 'good enough'?'. A Committee member voiced concern that the value of tribal resources could be undervalued if the focus of the Subcommittee is on the reliability of the identified methods. He noted it is very difficult to place a value on resources that are highly revered in one's religion, the long-term effect could be potential loss of a part of a cultural element; thus, contingent valuation, while difficult, may be the only way to value such resources. He observed it may be easier to agree upon specific projects as compensation than to try to place a dollar value on such resources. The Committee agreed that the regulation should not require a tool that might undervalue a resource and that all methods used in a litigation context should be reliable.

The discussion then touched upon the need to identify factors that determine the utility and reliability of data and data inputs for the methods, and then have all parties stipulate (i.e. agree to) use of the methods meeting the identified factors. This identification and stipulation process would provide certainty to all parties. The Committee agreed that early scoping exercises and meetings involving all appropriate parties would be helpful in determining the factors to consider and recommended the Subcommittee discuss what

might constitute appropriate guidance (allowing flexibility and the ability to change) and carefully delineate what the problem is for which guidance is needed (or regulatory change, if appropriate). The Subcommittee was advised to keep in mind that guidance can provide reliable, fast, and efficient methods to facilitate settlements, whereas regulations as currently written deal with issues of litigation. The Committee advised that, whatever recommendations the Subcommittee decides upon, the focus should be on the need for the recommended change.

A Subcommittee member asked the Committee whether the Subcommittee should greatly change their charge to also address what should not be changed in the regulation. The DFO responded that the Subcommittee should focus on the issue assigned. Whether the Subcommittee decides to recommend specific guidance and/or a regulatory change, that recommendation, with appropriate analysis, should be forwarded to the Committee.

A Subcommittee member raised the question as to whether the regulation provided for project-based compensation. Mr. Carlucci advised that a project-based approach could be subject to challenge because 40 CFR 11.83(c) (3) says that “compensable value” is measured by the monetary value of the public’s “willingness to pay,” not the cost of the project that restores equivalent services. Ms. Casano added that an editorial change to the regulatory language might be appropriate to clarify this issue. A Committee member questioned how responsible parties know when they have reached ‘closure’ if the compensation is project-based. The Committee agreed that there should be standards or criteria for determining when appropriate compensation has been achieved.

Public comments were provided by Mr. Rich Curley (Holland & Hart), Mr. Bob Unsworth (IEC), and Ms. Vicky Peters (State of Colorado Attorney General’s Office). Mr. Curley remarked that the regulations are primarily for use in litigation, whereas in negotiated settlements the parties can set their own rules. He urged that the Subcommittee keep in mind the purpose of any recommendation and that the Subcommittee not recommend changes to the regulation, but rather focus on how to best use the methodologies available. Mr. Unsworth stated that equivalency-based economic approaches are reasonable tools. Ms. Peters suggested that an additional advantage of using restoration projects to compensate for interim losses is to facilitate integration with remedial actions. She disagreed with the inclusion of “availability of appropriate substitute resources” as a required element for considering interim loss determinations and recommended that that be deleted from further Subcommittee deliberations. She also advised that she opposed the bullet in the PowerPoint presentation “Proportionality of Unit Restoration Cost to Unit Resource Value”, the provision of human services as compensation for interim losses, and she recommended that the regulations be revised to allow restoration-based assessments for interim losses. Lastly, she cautioned the Committee against setting up dual assessment provisions, suggested the Subcommittee consider which regulatory provisions are impediments to the Trustees following the regulation, and address whether Trustees can follow some regulatory provisions, ignore others, and still receive a rebuttable presumption.

Ms. Casano and Mr. Carlucci summarized the meeting discussion, noting that the Committee had agreed with the Subcommittee analysis that project-based restoration was authorized in the existing regulations, and the strong recommendation from the Committee to 'not fix something that wasn't broken' as they consider the need for guidance versus regulatory changes.

Subcommittee 2 – Report and Discussion

Subcommittee question: *Should DOI's regulations provide additional guidance for determining whether direct restoration, rehabilitation, replacement, or acquisition of equivalent resources is the best strategy for addressing natural resource injuries?*

Subcommittee 2 member Bill Brighton reviewed the Subcommittee's PowerPoint presentation, noting that the current regulation allows much flexibility, an important element that the Subcommittee recommends be maintained. He advised that, since the last meeting, the Subcommittee had drafted a report (available at <http://restoration.doi.gov/faca.html>) which outlines the eight sub-questions (to the question assigned to the Subcommittee) presented to the Committee at the March 2, 2006 meeting. The draft report discusses the pertinent issues pertaining to each sub-question, the Subcommittee's thoughts or ideas relative to those issues, and the Subcommittee's draft recommendations on those issues. He noted that the underlying ground rules in their deliberations were: 1.) if it isn't broken, don't fix it; and 2.) utilize as much of the Oil Pollution Act NRDAR regulation criteria as possible.

Committee discussion of the Subcommittee's report revolved around the issues of nexus between the potential restoration alternatives and the injury; development of some basic criteria (to serve as a threshold to make sure proposed restoration alternatives meet a minimum level of restoration); in addition to meeting the more general criteria, maintaining the flexibility to require site-specific criteria; an affirmative recognition that a project providing cultural services (but not enhancing natural resources) may be appropriate where cultural uses are lost; the need to provide more explicit guidance about the types of projects that are appropriate restoration projects; the possible replacement of criteria in the current Type B Regulation and/or wording changes to the regulation; the need for guidance in defining a 'reasonable' range of alternatives; and identification of restoration options as early in the process as possible. The Committee generally agreed with the Subcommittee on their recommendations for each of the sub-questions and will make a final evaluation and recommendation based upon the Subcommittee's final analysis and recommendations.

Public comments were provided by Ms. Vicky Peters (State of Colorado Attorney General's Office), who noted that on-site restoration is not preferable in many situations and that if restoration-based projects are pursued, there may be a need for guidance regarding a preliminary estimate of damages; and Mr. Rich Curley (Holland & Hart), who recommended that the Subcommittee stay focused on the 'don't fix if not broken' ground rule, specifically with regards to the Type B criteria.

Mr. Brighton summarized the discussion, noted the agreement on the need for additional guidance; and thanked the Committee for their ideas. He advised that the Subcommittee would be meeting in the near future to complete their task.

Closing Remarks for the Day

Committee members agreed that the Subcommittees should make whatever final recommendations to the Committee that they deem appropriate. The Committee also asked members of the public to provide specific examples of problem areas they have encountered. A Committee member asked whether each Subcommittee had contacted non-Committee members as part of their deliberations; DFO DeLuise responded that each Subcommittee approached their assignment differently. A Committee member suggested that it might be useful if each Subcommittee provided a list of the people contacted as part of their deliberations; several Committee members opined that it might be difficult to formulate a complete list at this point (i.e., after the fact/time passage).

Committee members voiced an interest in learning more about cultural resources. Committee members Work and Gover volunteered to provide a session on Tribal Trust Resources. Committee members Bresnick, Goldsmith, and Hartman agreed to work with them to include other aspects of the American cultural resource protection in the session.

DFO DeLuise encouraged the Committee to take advantage of the energy and synergy that has developed and to continue to focus on recommendations that will serve to make the NRDAR process function better. Following on the theme of 'don't fix if not broken,' a Committee member suggested that each subcommittee state in its report what the problems are that need to be fixed, so that the Committee can be sure what the problems are and that they are addressed in the final recommendations.

A Committee member asked about the Subcommittee reports that will be submitted, wanting to know if one report was expected from each Subcommittee. DFO DeLuise responded that yes, the expectation was that one report would be submitted from each Subcommittee. However, he added that it was not mandatory that the report present a consensus position. If consensus can not be reached within a Subcommittee, the report could present a 'majority/minority' position (with pros and cons of each position). Several Committee members voiced the opinion that they were well on their way to having a final report within their Subcommittee. A Committee member suggested the meeting be adjourned, allowing the Subcommittees to meet for the next hour. Vice-Chair Wooley asked for any final comments; hearing none, the meeting was adjourned for the day at 4:00 PM.

DOI NRDAR FACA Committee Meeting July 27, 2006

The third DOI NRDAR FACA Committee meeting reconvened at 8:40 AM on July 27, 2006, in the Rio Grande Room of Building 67, on the Denver Federal Center, Denver, Colorado. Vice-Chair Charlie Wooley called the meeting to order, again welcomed all

the Committee members and members of the public, then turned the meeting over to Subcommittee 1 for its presentation.

Subcommittee 1 – Report and Discussion

Subcommittee questions: *What are the best available procedures for quantifying natural resource injury on a population, habitat or ecosystem level? What guidance is appropriate for the utilization of these procedures?*

Subcommittee 1 member Dale Young provided an overview of the Subcommittee's deliberations to date and the approximately 40 page report that the Subcommittee has been drafting. Because the report is not yet in a form for submission to the Committee, Ms. Young summarized the Subcommittee's major findings as outlined in a Status Report and delineated the activities undertaken to date and the questions for which the Subcommittee was seeking input from the full Committee (see 'Question 1 Subcommittee Status Report' at <http://restoration.doi.gov/faca.html>).

Ms. Young advised that the Subcommittee discussed the need to refine the initial questions provided by the Committee but now concurs that the original question should remain unchanged. In researching the question, the Subcommittee had contacted a number of experts who work in academia, private industry, or government (federal, state, or tribal) as part of their efforts to determine what past experience has taught us. Based upon the information gleaned from these contacts, as well as the experiences of the Subcommittee members, the Subcommittee (with one member not in full agreement) has focused upon three basic themes: allow flexibility in selecting procedures to fit the assessment and restoration goals for a case while seeking a balance between the limitations of human, fiscal, and time resources; fit the scale and complexity of the case and physical location yet maintain sound scientific approaches; and either amend the current regulations to increase flexibility in the NRDAR process or provide new, technically sound guidance. Subcommittee 1 member Barbara Goldsmith, the member not in full agreement with the three themes, then delineated her concerns with these three themes, stating: 1) the regulations already allow the use of "any procedure" to assess injury, thus already allowing flexibility; 2) flexible procedures may be faster or cheaper, but they can also lead to unreliable results; 3) the regulations only require the Trustees to use "best available" assessment procedures to qualify for a rebuttable presumption in court; and 4) Trustees can use any other assessment procedure in court, after showing that the alternative procedure is reliable, which, in Goldsmith's view, is a reasonable requirement in those few cases that actually go to trial.

Ms. Young also detailed the on-going questions for which the Subcommittee was seeking Committee input: the need to provide a clear definition of the terms population, habitat, and ecosystem; whether the NRDAR regulations should be changed to specify injuries to individual organisms; the appropriate level (individual, population, habitat, or ecosystem) for determining and quantifying injury; the need/desire to establish injury thresholds or define what is biologically significant; and a framework from which to address the question assigned to the Subcommittee.

Subcommittee 1's presentation engendered a lengthy Committee discussion, ranging from the observation and some consensus that the confusion was in how the terms are applied (e.g., what population), to not needing to identify one approach as better than another but to focus on what seemed appropriate for the situation, to needing to stay focused on the need to show basic injury and injury determination. Several Committee members pointed out that the existing NRDAR regulations do not prevent flexibility, that site factors may determine the scientific approach used, that the existing regulations recognize that harm comes from many sources and that restoration should be proportional to the injuries sustained, and that the Subcommittee needed to consider what is not working and why. The point was made several times by several Committee members that there was no need to spend time on things "that were not broken". One Committee member cautioned against putting settlement practices into the rules, and said that parties can make their own rules in settlements.

A lengthy discussion centered on the question of whether there is a threshold at the population, habitat, or ecosystem level for determining injury and whether impairment below that level (e.g. some small number of individual organisms, ten dead ducks) would not constitute injury. The consideration of injury to individuals was discussed at some length, with the counterpoint raised that in certain circumstances those injuries may be extremely important (e.g., on Tribal lands where the resources administered and protected by the Tribe are finite). This threshold/assimilative capacity discussion led to a discussion of whether the OPA scaling paradigm, where the level of restoration is proportional to the level of injury, might be considered preferable to a threshold trigger for quantifying injury. There was general agreement in the Committee that the Subcommittee should continue to discuss and analyze these issues (assimilative capacity versus scaling) and include any recommended approach in their report to the Committee at the next meeting.

The Committee also recommended that the Subcommittee focus on and identify those techniques or methodologies that can reliably be used to determine and quantify injury at levels ranging from individual through community, population, habitat, and ecosystem. This analysis should include the pros and cons of using the various techniques and guidance on which of the various biological scales the techniques should be applied to. Rather than trying to identify one method that is "best", the Subcommittee should delineate those approaches that are being used or could be used to allow settlements to be reached and resources restored, with a focus on procedures, not definition of terms like injury, biologically significant, etc.

Subsequent to the Subcommittee's presentation and before additional Committee discussion, Vice-Chair Wooley asked those members of the public who had indicated they wished to provide comments to do so. Comments were provided by Ms. Vicky Peters (State of Colorado Attorney General's Office), who recommended an identification of the problems with the existing regulations; and Mr. Rich Curley (Holland & Hart), who recommended an identification of best available practices at the population, community and ecosystem levels, and when and how to apply them; he also

recommended that the Subcommittee not stress or emphasize issues of flexibility or practicality (what seems flexible or practical to one person or in one situation, may not be to another person or in another situation).

In conclusion, Ms. Young acknowledged that the issue Subcommittee 1 was investigating has a long history with a wide array of approaches used. She summarized that the recommendations she heard were to answer the assigned question, address the pros and cons of the best available practices, and provide any recommendations for possible procedural guidance and/or changes to the regulations.

In response to a question raised by Committee member Gover regarding tribal representation on Subcommittee 1 and Ms. Young's question to the Committee regarding that issue, DFO DeLuise reminded the Subcommittee specifically, and the Committee generally, that any needs that are identified as part of their deliberations (e.g., logistics, staff assistance, or involvement of other Committee members) should be raised to him for resolution.

Subcommittee 4 - Report and Discussion

Subcommittee question: *What additional measures should DOI consider to expedite planning and implementation of restoration projects and to ensure effective and efficient restoration after awards or settlements are secured?*

Subcommittee 4 member Sharmian White provided the Subcommittee's report to the Committee. Ms. White began by reminding the Committee that Ms. Lynelle Hanson, having taken another job, had withdrawn from the Committee/Subcommittee. She then reviewed the information contained in the Subcommittee 4 PowerPoint presentation (available at <http://restoration.doi.gov/faca.html>).

Committee discussion of the Subcommittee's report focused upon the issues of cooperative assessments, solicitation of grant projects, building partnerships, and the role of NEPA in restoration implementation. Ms. White noted the potential 'overlap' between the Subcommittee 2 and 4 assigned issues. The Committee recommended that, for those cases when a formal cooperative assessment agreement is to be signed, that the Subcommittee develop guidelines or a range of options rather than one model agreement, allowing for potential variations between cases. The Committee raised concerns about soliciting grant proposals from the public post settlement, noting that the trustees and responsible parties needed to ensure that the selected projects have a nexus to the case's natural resource injuries and to know what restoration projects were intended/being funded prior to reaching a settlement. The Committee recommended that the Subcommittee not utilize the term 'grant', which implies minimal supervision once 'granted', but rather strengthen the focus on building partnerships, with an understood clear continued involvement of the trustees throughout the restoration project. The Committee agreed with the assessment of DFO DeLuise, that Subcommittee 2 and 4 were pursuing closely related issues, and that, to ensure minimal overlap of efforts, Subcommittee 2 would focus on the issue of coordination with response action planning

including coordination with the EPA Superfund program while Subcommittee 4 would focus on the issue of regional restoration planning.

Public comments were provided by Ms. Vicky Peters (State of Colorado Attorney General's Office), who advised that the State of Colorado has a policy on how recovered funds are distributed. She also advised, based upon the State's experience, that the largest impediment to implementing restoration projects has been coordinating and mediating among local entities vying for 'grants', and that it is easier to garner good ideas than it is to find appropriate partners to implement the restoration projects.

Ms. White summarized the Committee recommendations and advised that the Subcommittee would develop guidelines/range of options for cooperative assessment agreements, providing available documents as examples; focus on the development of partnerships; and avoid the use of "open calls" to identify restoration options as that may lead to public expectations the trustees or settling parties are not able to fulfill. Committee member Lisa Gover suggested, and it was agreed that Committee member Ralph Stahl share his cooperative assessment experiences with the Subcommittee.

Future Meetings and Actions

DFO DeLuise commended the Subcommittees on their efforts, noted that the Subcommittees appeared well on their way to reaching some valuable consensus recommendations, and suggested the Committee next meet in November. The Committee agreed on November 15-16 as the dates for the next meeting, in the Washington, D.C. area [Note: these dates have since been rescheduled to November 29-30]. In preparation for the next meeting, DFO DeLuise strongly encouraged the Subcommittees to continue working on identified options and to clearly articulate any recommendations, including the pros and cons of the different recommendations if they can not reach consensus. He also noted he expects the Subcommittees to have completed their analysis and findings by the next meeting.

A Committee member raised a question about the appropriate specificity of the recommendations. DFO DeLuise responded that concepts were fine as well as suggestions on regulatory and/or guidance document language/wording. A Committee member added the comment that any proposed regulatory changes should be very specific. A Committee member also raised a question concerning how Subcommittee members could relay comments to or get feedback from other Subcommittees. DFO DeLuise advised that the current meeting was the opportunity and forum to conduct inter-subcommittee communications, but intra-subcommittee communications were appropriate at anytime. Another Committee member raised a question regarding the desired structure of the final Committee recommendations to the DOI Secretary. DFO DeLuise stated that the anticipated format should look much like that used by Subcommittee 2 and 3 in their PowerPoint presentations for this meeting (outline of the question/issue, with analysis, findings, and related recommendation following). He also indicated that he anticipated the Committee would provide an executive summary as part of the transmittal to the Secretary.

DFO DeLuise specified that the tentatively scheduled January 2007 meeting would serve as a final opportunity to comment/agree upon the Committee recommendations (discussed/agreed upon at the November 2006 meeting) and assignment of a task group to prepare the documents to be submitted to the Secretary from the Committee. The task group will provide a draft final document to the Committee in the Spring of 2007 for final approval.

DFO DeLuise concluded by thanking all the Committee members for their work on behalf of the Committee. He also offered his thanks to the members of the public and the Committee's support staff.

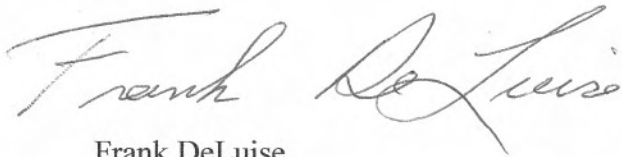
Ms. Dale Young asked how Subcommittee 1 could access tribal representation for their Subcommittee's deliberations; DFO DeLuise advised that the Subcommittee make the request to him and he would follow-up.

Adjournment

Vice-Chair Wooley thanked everyone for their attentiveness and comments; concluding that it had been a very effective meeting in achieving the objective of helping the Subcommittees fulfill their tasks. The meeting was adjourned at 2:45 p.m.

DFO Certification

I hereby certify that, to the best of my knowledge, the foregoing minutes are accurate and complete.



Frank DeLuise
Committee Chair and Designated Federal Officer
DOI NRDAR Federal Advisory Committee

Oct. 10, 2006

Date