

LTS Management Task Group

Input to Department of Energy (DOE) and Sandia National Laboratories/New Mexico (Sandia/NM) Long-Term Stewardship (LTS) Plan

May 2001

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I. INTRODUCTION

History

The Department of Energy (DOE) and Sandia National Laboratories, New Mexico (SNL/NM) are nearing the end of a 10+ year environmental restoration (ER) project. The project has grown from information gathering and characterization to full-scale environmental restoration of technically challenging contaminated sites. In the next several years, the active cleanup portion of the project will end and so planning for long-term stewardship of these sites has begun. (For more information, see the LTS web site: http://www.sandia.gov/ltscenter/lts_center.html).

At a public meeting on May 4, 2000 DOE and SNL started a public involvement process to determine what were the public values on long-term stewardship of ER sites. At this meeting DOE and SNL asked for volunteers to participate in a public task group to address the topics of (1) Stewardship Management, (2) Data Management and Institutional Controls, and (3) Environmental Monitoring. The volunteers who chose to join the Stewardship Management Task Group accepted responsibility for providing inputs on how LTS should be managed. At the LTS stakeholder meetings on August 24 and November 14, opportunities provided for public inputs and useful ideas for stewardship management were obtained from the public and members of the other task groups.

The Stewardship Management Task Group established five goals for itself:

- Identify stewardship responsibilities
- Identify management structure and vision
- Identify funding sources
- Identify public outreach media/education
- Suggest legal and legislative drivers.

Each of these goals is addressed in sequence in the following sections of this report.

Definition of Stewardship

At its first meeting, the Stewardship Management Task Group developed the following definition of stewardship in relation to the environmental restoration sites at SNL/NM. This definition is based upon one generated by the Oak Ridge Stewardship Working Group and provided a foundation for the work of this task group.

Long Term Stewardship is the ongoing acceptance of the responsibility and the implementation of activities and processes necessary to maintain and monitor long-term protection of human health and of the environment from hazards posed by residual radioactive and chemically hazardous materials and wastes.

Vision of the LTS Plan

The Stewardship Management Task Group's vision for the SNL/NM LTS Plan is that it be dynamic with respect to execution and monitoring and it be adaptive (even self-correcting, if possible). The Plan must be flexible and provide for review and possible inclusion of new environmental restoration/stewardship technologies. It must address short term needs, during the period when the RCRA permit is still in force, and also provide a means for resolution of longer term issues that may arise when no such permit exists. Finally, it must present a clear commitment to stewardship by the stewards.

Participants and Meetings

The following citizens participated in one or more meetings of the Stewardship Management Task Group: Dave Bourne, Will Hoffman, Roger Kennett, Rich Kilbury, Bob Long, Hal Marchand, JoAnne Ramponi, Craig Richards, Diane Terry, Debra Thrall, Ramona Torres-Ford, Ted Truske, Gary Yeager. Sue Collins and Ted Wolff, both members of SNL/NM’s Environmental Restoration Project, were task group leader and facilitator respectively. Dick Fate, in charge of preparing the LTS Plan at SNL/NM, attended our first meeting. Will Keener, also a member of SNL/NM’s Environmental Restoration Project, Beth Oms from the local Department of Energy (DOE) office, and Karren Suesz, administrator of the Community Resources Information Office, attended one or more meetings.

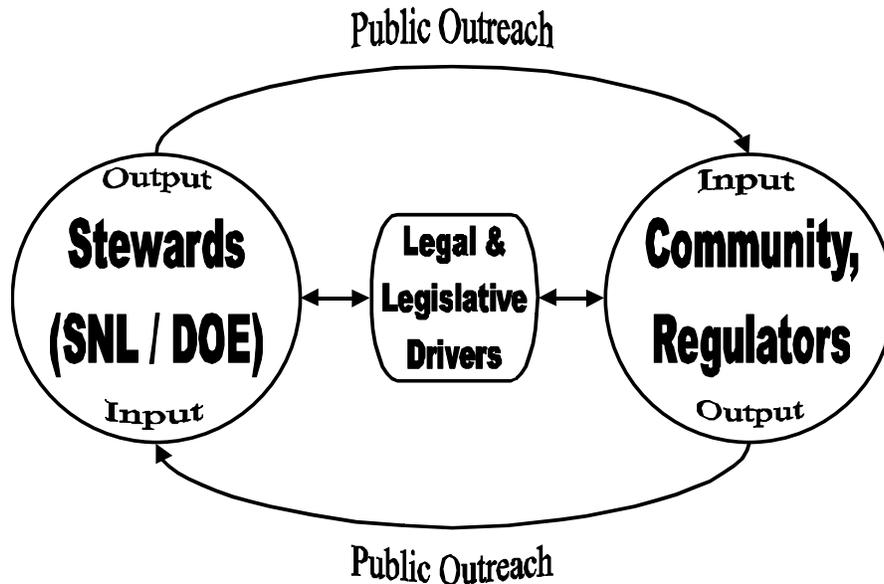
Table 1 is a list of the meetings of this task group. All of these meetings were held at the Community Resources Information Office. Some Stewardship Management Task Group members attended and made presentations at each of the general LTS Plan meetings at the Indian Pueblo Cultural Center. The public was invited to the task group meetings at the general meetings and all of our meetings were open to the public.

Table 1. Meetings of the Stewardship Management Task Group

1 June 2000	2 November 2000
22 June 2000	30 November 2000
13 July 2000	30 January 2001
17 August 2000	22 February 2001
14 September 2000	14 March 2001
5 October 2000	20 March 2001

At our July 13 meeting, we drafted a stewardship model, a simplified representation of what stewardship means, to illustrate the components of stewardship management and their iterative relationships. The model was refined at subsequent meetings. The final version is shown in Figure 1.

Figure 1. Stewardship Model



As indicated in the figure, the Stewardship Management Task Group considers SNL and the DOE to be the primary stewards of the restored environmental waste sites at SNL. They operate under the constraints of legal and legislative drivers, shown in the middle of the figure. They must perform public outreach via reports, media and education to inform the public in the neighboring communities (the stakeholders) and the regulators. The community and the regulators have responsibility for monitoring the stewardship program and providing public outreach to give feedback to the stewards, such as proposed changes to the LTS Plan. The regulators are subject to the legal and legislative drivers. Both the stewards and the community/regulators can influence the legal and legislative drivers, as indicated by the two-headed arrows connecting these three components.

The groups comprising the stewardship model and their roles are described in the following section of this report.

II. STEWARDSHIP RESPONSIBILITIES

Currently DOE and SNL/NM have primary responsibility for stewardship. In the near term we expect that DOE and SNL/NM will continue to be stewards due to obligations in the HSWA permit with NMED. In the long term, if DOE leaves as the primary steward, the community demands that there will be some Federal successor with sufficient funding and legal authority.

Table 2 and Table 3 list the responsibilities of the groups identified in the Stewardship Model (Figure 1). To address how stewardship might be managed in the near term and long term, these tables specify whether the responsibilities are current (C), future (F), or potential (P). During brainstorming sessions, Task Group members had many ideas about how stewardship might be better managed in the future. The task group expressed the value of having independent parties perform some stewardship responsibilities to improve public confidence. Also, the group felt strongly about using an institution with more permanence than DOE such as UNM, museums, the USGS or the City to perform some responsibilities. Most of these institutions are already in the business of information storage, data collection, etc.

The current stewardship responsibilities of DOE include stewardship funding, regulatory interpretation, and enforcing and managing land use. SNL/NM is responsible for implementation of stewardship for DOE, including monitoring, inspections, reporting, and records management. In other words, this task group described the stewards as the doers and the funding people who need to know everything about their sites, including site history and planning for the future.

There are some other government agencies with current stewardship responsibilities of land use, land management, and/or land ownership. At KAFB, landowners include DOE, DoD, and USFS. Adjacent neighbors include Isleta, City of Albuquerque, Bernalillo County, and the State Land Office. ER site location and land ownership is currently tracked by the ER Project and is described in detail by the Institutional Controls and Data Management Task Group.

Table 2, Community and Regulator Roles, lists all the other groups that are not stewards but can have roles in the stewardship process. NMED and EPA are responsible for oversight; setting standards, education, and enforcement. All these groups can assume responsibility through the public outreach process. Outreach is described in more detail in Section V.

Table 2. Stewards' Responsibilities

	Funding	Maintain Sites	Monitor Sites	Land Use Management	Reporting	Records Mgt.	Education Outreach	Regulatory Oversight
DOE*	C	C	C	C	C	C	C	
SNL		C	C	C	C	C		
B. County			P	F			P	
USFS				C				
BLM				C				
Isleta				C				
DoD				C			C	
Fed-General	F	F	F	F	F	F	F	

C = Current role, P = Potential role, F = Future Role

*or Federal successor

Table 3. Community & Regulatory Roles

	Funding	Maintain Sites	Monitor Sites	Land Use Management	Reporting	Records Mgt.	Education Outreach	Regulatory Oversight
City		P	P	P	P	P		P
State			C	P				C
USEPA			C					C
University						P	P	

C = Current role, P = Potential role, F = Future Role

Concerns and recommendations:

- Identifying stewards and their roles was a somewhat confusing process. When one considers 100-year plus time scales, it becomes overwhelming. This Task Group endorsed ideas of breaking stewardship into short-term and long-term time scales and perhaps medium term. The short term would last as long as current HSWA permit obligations hold. The long term is the time scale when it is conceivable that the HSWA permit, institutional controls, or other controlling or regulating factors could be forgotten, lost or fail. Planning is different for these two scenarios: when permits and controls hold and when they fail.
- Tables 2 and 3 should be completed for SNL/NM's Stewardship Plan.
- There was much discussion about what is the best place or group to manage information storage: the Albuquerque museum, UNM libraries, the City, etc. DOE may not be the best information repository. There is concern that without funding and regulatory requirements proper information management will not occur. The SNL/NM Stewardship Plan should address this concern.
- The City and County ought to be engaged in the stewardship planning. DOE and SNL/NM should cultivate the relationship with the City and County.
- The group valued strongly having a more permanent independent institution play a strong role in stewardship.

III. MANAGEMENT STRUCTURE OF STEWARDSHIP PROGRAM

Introduction

This discussion has two aspects. The first is to specify a vision for the attitudes that we hope will drive and guide the management of the stewardship activities. The vision aspect is advanced throughout this text. In publications discussing ways to best manage public programs five strategies are noted as critical to achieving program goals. They are a clear identification of:

- The program core – to help a public program clarify its purpose.
- Consequences – to create rewards for a good organizational performance and penalties for poor performance.
- The customer, in the stewardship case the stakeholders – to make organizations accountable to their constituents.
- Control – to push decision-making power into the hands of managers and employees in order to improve performance and hold them accountable for results. With stewardship the control process must be visible to stakeholders and open to their comments.
- The culture – to change attitudes of public employees, e.g. the behaviors that led to the situations that now require stewardship programs in DOE.

It is important that DOE and SNL work to assure that the Long Term Stewardship programs are planned, executed and administered in keeping with the strategies noted above. Adherence to sound management principles will help meet the challenges of stewardship and aid in identifying and supporting the appropriate roles of DOE and SNL.

The second aspect includes an identification of the organizational components. Clearly stewardship work cannot proceed independent of the practical constraints of all programs, thus:

- The stewardship program and its management must structure itself around the other program elements (funding, drivers, etc) in an organic manner that is dynamically focused both on the EM requirements and our community's concerns (see management model on page ____).
- The stewardship program needs to address cost/schedule/performance issues within the overall context and framework that allows for the program to be adaptive and self-correcting today and in the future.
- The program and its management must work within a structure that allows technical and fiscal requirements to address community concerns and values over time as both the science and our society evolve.

This blending of technical (quantitative) and community (qualitative) perspectives of stewardship will generate better decisions and choices that we can all live with. The organization components that must be aligned in a coherent structure to achieve the stewardship objectives must include functional components and related elements to perform:

- Monitoring – test design, data collection standards, procedures and analysis
- Data Management – defining data structures and access policies, file management criteria, data storage alternatives, update standards
- Outreach – target groups, meeting schedules, criteria for effectiveness
- Assessing Applications and Impacts of New Technology – search and identification practices for alternatives, timing and cost criteria for feasible applications

- Institutional Controls – organization standards for oversight, process visibility, and criteria for accountability.

The process components to support the points noted above include:

- Identifying, specify goals, objectives – include, consider the relevant internal, external environments and circumstances.
- Constructing and assessing alternative programs to meet goals. Select a program.
- Identifying, committing appropriate resources to meet objectives – this includes staff, facilities, time, and relationships/contracts with external entities.
- Developing and evaluating alternative strategies and programs to apply resources to meet goals.
- Creating, identifying, and specifying policies, procedures to monitor program progress and detect exceptions to the program plan process.
- Reassigning resources to correct and/or compensate for exception operations or results to the plan.
- And finally a willingness to correct bad actions and policies while calling attention to the successful participants and processes.

The task is to apply the elements above to the specifics of the Sandia environment and processes. In particular the Sandia stewardship program must not be driven by imperatives set down by DOE headquarters that are not suited to the Sandia situation.

Concerns

The LTS/MGMT work group is concerned that DOE funding constraints and related SNL technical perspectives will solely drive the stewardship program and its management structure. Such a stewardship program would generate decisions and choices over time which only reflect the federal government’s need for a “cookie cutter” approach that is easier to administer and fiscally driven. Such a stewardship program would make choices as its completes planned events and overcomes surprise outcomes that are not always in our community’s best interest.

Recommendations

In order for the stewardship program to be dynamic, adaptive and self-correcting, the stewardship management framework must not be static or inflexible. It must never be viewed as finished or set in stone instead it must be a vital, open process with a structure that listens and learns from the consequences of its choices.

The stewardship management must include one or more community members that are allowed to fully participate in all decisions and choices, preferably as part of the program’s executive group. Community members must be invited to be part of all program elements, such as the NFA’s comment process, land fill reviews, ground water monitoring, etc.

The stewardship management must have a fully accessible, open door to all members of our community. The stewardship program must include such elements as:

- CRIO or community centers
- EM visitor centers or museums
- Periodic public outreach meetings
- Other processes or sites that facilitate issue development and resolution, citizen interaction, and work/task groups.

Such processes and sites must eventually become self-funding and self-perpetuating to ensure they outlive the current stewards and any future budgetary constraints.

The stewardship management must have energized and timely feedback mechanisms with a strong focus on community concerns and continuous self-evaluation. This process must be an integral part of all planning, events and oversight and must be open to members of our community, state and local governments, public and private EM work/task groups, etc. This process must be the catalyst for the listening, learning and self-correcting behavior, which should ensure that changing science and community values are factored into all program choices and that the stewardship program evolves into whatever shape and size, is appropriate over time.

We hope that DOE and SNL will work to assure that the Long Term Stewardship programs are planned, executed and administered in keeping with the five strategies noted above. Adherence to sound management principles will help meet the challenges of stewardship and aid in identifying and supporting the appropriate roles of DOE and SNL.

Closing Thoughts

In “Re-inventor’s Fieldbook,” David Osborne notes five strategies that must be part of any public program. As listed below they help frame the various management points noted above.

- The core – to help a public program clarify its purpose.
- Consequences – to create rewards for a good organizational performance and penalties for poor performance.
- The customer – to make organizations accountable to their constituents.
- Control – to push decision making power into the hands of managers and employees in order to improve performance and hold them accountable for results.
- The culture – to change attitudes of public employees, e.g. the behaviors that led to the situations that now require stewardship programs in DOE.

We hope that DOE and SNL will work to assure that the Long-term Stewardship programs are planned, executed and administered in keeping with the five strategies noted above. Adherence to sound management principles will help meet the challenges of stewardship and aid in identifying and supporting the appropriate roles of DOE and SNL.

IV. POTENTIAL FUNDING SOURCES

Discussion/Background

Success of a Long-term Stewardship program is dependent on a stable source of funding for the activities. The Long-term Stewardship Management Working Group shares the same concerns as participants of Sandia's LTS Stakeholders Meetings regarding continued funding of Sandia's Stewardship Program.

The amount of funding required for Long-term Stewardship (LTS) activities is a fraction of the costs for the Cleanup itself. For example, while over \$30 million per year is currently planned to complete the Sandia Environmental Restoration Project, the annual cost of Long-term Stewardship is currently estimated to be less than \$2 million per year. However, as many LTS activities are assumed to be required indefinitely, the availability and stability of long-term funding is of concern to stakeholders.

Funding will be needed to support:

- personnel, equipment, and laboratory analysis for monitoring activities
- managing monitoring data and historic information on past corrective action
- regulatory compliance with permits
- outreach and education to citizens
- research and consideration of new technologies
- contingency actions if monitoring indicates a problem

Current Plans for LTS Funding

Funding for DOE Environmental Restoration Projects is provided through annual congressional appropriations resulting from the federal budget process. Each year, the Sandia budget request is forwarded along with the budget requests for the other DOE Albuquerque Operations Office (DOE-AL) sites and programs to DOE Headquarters, and ultimately to Congress. The process introduces uncertainties that form the basis for citizens' concerns.

The DOE Albuquerque Operations Office budget process presently considers Cleanup and LTS needs through the year 2070. The Stewardship Management Working Group understands 2070 represents the limits of the budget planning tool, not a decision to terminate funding. Nevertheless, the uncertainties of the budget process (regardless of how relatively small the future requests are) warrant consideration of alternative funding sources and mechanisms apart from the traditional budget process.

As the working group discussed the short-term and long-term implications of the funding issue, we explored the possibility that DOE (and its contractors) will cease to exist as an entity. As long as a RCRA permit is in place, legal requirements for activities will provide justification for annual budget requests. Should DOE no longer exist, the Air Force will likely be responsible for funding stewardship activities while KAFB is an active base. The issue is compounded if KAFB closes.

Similarly, the LTS Institutional Controls/Information Management Working Group identified approximately 30 Sandia Environmental Restoration sites cleaned up to restricted land use (recreational or industrial) for which DOE has no lease agreement with the Air Force. These scenarios call for close cooperation with the Air Force. We suggest active negotiations begin now to clarify arrangements and prepare for such an eventuality.

Alternative Potential Funding Sources

The working group identified several other federal and non-federal agencies that may be potential sources of stewardship funding. The working group recognized that in general, funding sources other than DOE could provide only limited funding for specific activities or studies. Funds from some of the potential sources would support that entity's potential role in stewardship activities (See Section II, "Stewards and Roles"). Potential federal sources are also subject to annual appropriations from Congress.

Other federal agencies include:

AGENCY	FUNDING FOCUS
Department of Defense (as landowner)	Land use controls, Monitoring, Maintenance
Department of Interior (as landowner)	Land use controls, Monitoring, Maintenance
Forest Service (as landowner)	Land use controls, Monitoring, Maintenance
Environmental Protection Agency	Monitoring
Geological Survey	Monitoring (data collection)
Bureau of Indian Affairs	Monitoring
Centers for Disease Control	Risk evaluation & Outreach/Education
National Institutes of Health	Risk evaluation & Outreach/Education
National Science Foundation	Outreach/Education
Dept of Health and Human Services	Risk evaluation

Non-federal agencies include:

AGENCY	FUNDING FOCUS
City and/or County	Land use controls & Monitoring
State of New Mexico	Monitoring
Public Lands Fund	Education
Private grants	Various

Alternative Funding Mechanisms

Many citizens have suggested that a dedicated funding source be established for continued care at DOE sites. The full faith and credit of the US Government does not completely satisfy our concerns. Trust funds are now being studied by the Department of Energy as a mechanism for funding stewardship. We encourage the implementation of that type of mechanism at Sandia.

Recommendations for the SNL Long-term Stewardship Plan

- Establish a stable funding commitment from DOE HQ or federal successor (at a minimum)
- Establish a dedicated funding source, e.g., trust fund
- Budget for contingencies above the costs of regular maintenance and monitoring activities
- State clear commitment to budget planning beyond 2070
- Define funding responsibility for sites that have no lease from the Air Force

V. OUTREACH

Introduction/Background/Discussion

The basic premise of outreach is for stewards to maintain relationships with the Stakeholders. These relationships need to be accessible, consistent, on-going, robust, and responsive to deal with changing concerns. Stewards must listen to the public as well as share information.

Concerns

Stewardship outreach is charged with finding out what information the public needs and then addressing it. Stewardship outreach should not be limited to just this and the next generation. Information about stewardship must not be forgotten so outreach must be publicly present at all times on a regular basis. Stewardship outreach needs to address evolving communication and information technologies. Stewardship outreach must not concentrate on one particular remediation site.

As public acceptance of the long-term stewardship process is vital to the success of the project, dedicated outreach funding must be identified. This will ensure that not only DOE/SNL or succeeding entities, but also the general public has ownership of and feels responsible to the stewardship process. In an effort to ensure that the public has trust in the stewardship outreach group, the outreach group must be open, evolving and composed of many differing viewpoints.

Recommendations

In an effort to ensure that the public voice is heard and that all needs are considered during the stewardship process, the long-term stewardship management working group recommends the following:

1. Establish a stewardship outreach working group composed of the general public and other interested parties. This group would be responsible for physically interacting with the general public and SNL/DOE on stewardship issues. This would also provide a place for the public to present concerns.
2. Establish a multidisciplinary advisory panel to ensure that uniform/relevant information is being presented to the public and to advise the outreach working group. This should include representation from among the following areas: the public, academicians, scientists (nuclear, chemical, electrical, computer, mechanical, etc), risk analysis experts, historians, anthropologists, community health experts, land use planners, water resources experts, hydrologists, geologists, economists, and non-governmental organizations.
3. This advisory panel will develop a presentation that will address the following areas which will be presented by the outreach working group:
 - historical perspectives including the history of remediation of the ER project and US' transition from a defense based nuclear power to a non-defense based nuclear power
 - What's there - the SCIENCE behind it
 - relative/perceived risk
 - community/personal/employee health and safety
 - land use
 - encroachment of population
 - water quality/quantity

- air quality
 - geology
 - economics
 - regulations
 - transportation of waste
 - evolving technologies
4. Informational presentations for the general public should have multiple modes of delivery, including, but not limited to:
- Community Resource Information Office (CRIO or its successor facility) will be involved and will maintain an office for the duration of stewardship
 - Multi-media presentations to community groups
 - A general presentation that will be used in schools and communities which includes basic radiation education, hazardous materials issues and how they differ from radiation issues and a description of the stewardship process including roles, responsibilities and public impact
 - The following criteria should govern the presentation:
 - ◆ It will be factual and user-friendly.
 - ◆ Must be written in a language that the average citizen can understand.
 - ◆ The presentation should be reviewed at least periodically to include evolving, relevant information.
 - Creation of relevant Informational Bulletins as needed - at least quarterly
 - Coordinating public tours of the remediation sites - at least twice a year
 - Creation of a permanent display at the National Atomic Museum
 - Creation of a traveling display for other interested museums
 - Create and maintain a speaker's bureau
 - Create and maintain a repository of pertinent evaluative data that is easily accessible to the public
 - Establish an interactive website which will be available to the community:
 - ◆ List tour schedules, presentations, workshops.
 - ◆ Have an outline of the stewardship presentation
 - ◆ List links to resources for further information related to stewardship and radiation education
 - ◆ List of contact information for the outreach group
 - ◆ Establish the means by which the public can post comments/questions.
 - ◆ Answers should be posted on the website as a means of encouraging public participation.
 - ◆ List the history and location of each "stewardship" site which also contains the pure data of each site in text format.
5. The impact of remediation on the general public must be taken into consideration so that it negatively affects the least amount of people and land area.

VI. LEGAL AND LEGISLATIVE DRIVERS

Discussion/Background

Questions regarding the requirements that will drive long-term stewardship of Environmental Restoration sites arose during the deliberations of the LTS Management Task Group and the larger public meetings/workshops held at the Indian Pueblo Cultural Center. Many Environmental Restoration sites will not be cleaned up to levels allowing unrestricted (residential) use. What requires Sandia to perform the necessary activities that will protect human health and the environment into the future?

A National Pollutant Discharge Elimination System permit issued by USEPA requires storm water monitoring. Storm water samples can detect impacts to surface water that may occur due to erosion at Environmental Restoration sites.

The New Mexico Environment Department administers regulations for the protection of groundwater quality. Currently, regulation of groundwater quality as it relates to the SNL/NM Environmental Restoration program is deferred to the Resource Conservation and Recovery Act (RCRA) permit. This permit provides the requirements for the investigation and ultimate levels of cleanup at Environmental Restoration sites.

The existing RCRA permit administered by the New Mexico Environment Department can be the legal driver to require:

- Erosion control inspections and maintenance
- Landfill cover inspections and maintenance
- Ground water and vadose zone monitoring
- Contingencies for additional cleanup due to changing conditions

To demonstrate commitment that these activities will be accomplished, SNL/NM should request a modification of the RCRA permit that specifies the requirements. The Long-Term Stewardship Plan could be made part of the permit.

Concerns

The task group considered the possibility that the RCRA permit might be terminated at some point in the future due to closure of the Air Force Base or shut down of SNL/NM. By formalizing LTS activities as RCRA permit requirements, the transfer of responsibility would be clearer.

Citizens are concerned that maintaining land use controls at Environmental Restoration sites with residual contamination will be difficult. Using the existing RCRA permit to enforce land use controls is not the most effective mechanism. The task group feels that legislation assigning enforcement authority through the State of New Mexico to local government should be sought.

In the absence of legally enforceable land use controls, SNL/NM should explain in the plan how its existing internal property management process functions to instill confidence that land use restrictions are maintained. Further, SNL/NM should actively engage the Bernalillo County Clerk's Office and City of Albuquerque Planning Department to formulate a process for transferring the property tracking authority at some future date.

Recommendations for the SNL/NM Long-Term Stewardship Plan

- Request RCRA permit modification that clarifies LTS activities as permit requirements, and assures tracking and land use controls for industrial and recreational use sites
- Support legislation to provide state or local government authority to enforce land use restrictions
- Actively collaborate with the appropriate City/County organization to develop land use tracking mechanism
- Describe the existing SNL/NM internal property management system
- Devote a section of the plan to explain existing legal drivers that require long-term stewardship activities

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