

# **SIKES ACT WORKSHOP SUMMARY**

**April 26-28, 2004**

**National Conservation Training Center**

## **Introduction**

### **I. Planning for INRMP Revisions**

**Questions Discussed  
Recommendations**

### **II. Improving the INRMP Process**

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Recommendations**

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## **INTRODUCTION**

The primary purpose for this workshop was to develop action plans for resolving Sikes Act Improvement Act (Sikes Act or SAIA) implementation issues. Changes to the Sikes Act in the FY 2004 National Defense Authorization Act (NDAA) require in practice, if not legally that Integrated Natural Resources Management Plans (INRMPs) meet higher standards for preparation, coordination and implementation. Added scrutiny will demand more resources from the Fish and Wildlife Service (FWS), Department of Defense (DoD), International Association of Fish and Wildlife Associations (IAFWA) and State fish and wildlife agency personnel.

This workshop initiated proactive planning for the future needs of Sikes Act implementation. The Fish and Wildlife Service's Washington, regional, and field staff, DoD, and State personnel had the opportunity to interact and begin development of plans, policies, and guidance that will comply with the 1997 Sikes Act and NDAA amendment requirements, while meeting the needs of species on DoD lands.

## **I. PLANNING FOR INRMP REVISIONS**

### **Questions Discussed**

What is a revision/review?

- Depending upon the answer to number 1, what level of outside involvement is required in revision/review?
  - Legal parties (FWS, States)
  - Other stakeholders
- Does lack of annual review affect revisions?
- What is the best process for annual reviews?
- How do you document the annual review process for operation and effect?
- What NEPA analysis is needed for revision/review? What level of public involvement is needed?

How do we prioritize which INRMPs are revised first?

How can the internal FWS process be improved to ensure coordination among all internal reviewers?

How do the Endangered Species Act (ESA) and Readiness and Range Preservation Initiative (RRPI) apply to revisions?

How do other FWS specialty areas (i.e. migratory birds and contaminants) fold into INRMP revisions/review? Parallel guidance? What is the appropriate level of detail in INRMPs?

- Strategic oriented project description
- Detailed project descriptions

What guidance is needed to document the answers to these questions?

## Recommendations

- **Review vs. Revision.** There was some confusion regarding the nature of the statutory obligations to review the INRMP “as to its operation and effect” every five years. After careful consideration, there was general agreement that a review, not necessarily a revision, of the INRMP is required no less often than every five years.
  - No less often than once every five years, the installation and FWS and the State should review the INRMP to determine if it is satisfactory in its current form, or if it needs revision.
  - Annual tripartite reviews are required with FWS and appropriate state fish and wildlife agencies per DoD policy.
  - Three potential options exist:
    - Review and confirm existing plan needs no revision
    - Update plan (e.g. make minor adjustments to address adaptive management; these changes will not trigger NEPA process)
    - Revise plan (i.e. make significant changes; this will trigger the NEPA process); The review must take place even if no revision is required.
  - The review should be confirmed in writing to document for the record the mutual agreement that such review has occurred and that the INRMP is on track.
  - The review should be documented via a tripartite signature at least once every five years.
  - The Annual Report to Congress (ARC) should be used to document regular reviews and updates to INRMPs; a column should be added to the ARC tables to capture the completion of a “review” or “revision”.
  - DoD and FWS should share reports with each other and IAFWA (International Association of Fish and Wildlife Agencies), including the database upon which the reports are based; may want to address this in the MOU.
  - What level of detail is needed in the INRMP?
  - DoD should promptly develop a policy memorandum for the Deputy Assistant Secretary’s of Environment for each Service to dispel the misunderstandings regarding the scope of the required five-year reviews.
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- **Determining the need for Revisions.** Some discussion ensued regarding how to determine whether a revision is required. There was general recognition that only certain types of changes warrant a revision of the INRMP.
    - NEPA is not the trigger for revisions – the need for a new or supplemental analysis under NEPA may be triggered by the revisions that are made.
    - If there is a small change and NEPA is not triggered, then no revision is required.
    - The decision as to whether a revision is needed should be made at the installation/field office level/state.<sup>1</sup>

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<sup>1</sup> FWS guidance on criteria for what triggers an INRMP update was reviewed. Criteria are: 1. No material difference; 2. Beyond the scope of the original EA; 3. Effects determinations are out of date or insufficient.

- As mentioned above, an update to the INRMP (not a revision) may be appropriate where only adaptive management adjustments are needed, and these adjustments were anticipated when the INRMP and EA/EIS were completed.
  - Listing of a new T&E species would normally – but not always – precipitate the need for an INRMP revision; the issue would be whether or not the existing INRMP encompasses management strategies that provide for the new species.
  - Note: A comment was made that if INRMP goals are not being met, the INRMP needs to be revised. However, no clear agreement was reached to adopt these criteria.
  - The Military Departments were required by the SAIA to provide the public an opportunity to comment upon the initial INRMPs. An opportunity for the public to comment upon revisions to existing plans is not required by the Act, but may be required by NEPA. Whether and how to solicit public comment on INRMP revisions is a decision that may be made at the installation/FWS Field Office/State level.
  
- **Clarify Roles of Various FWS Offices.** It is recognized that multiple program offices within the FWS may have a role in the review of the INRMPs. Mention was made of delays in finalization of INRMPs due to late involvement of other offices. The particular areas mentioned were: program offices that deal with contamination, migratory birds, hunting, and fishing. In addition, the interface between the Installation Restoration planning documents and INRMPs was discussed.
  - It was recognized that it was the responsibility of the federal and state FWS offices to ensure that all the appropriate federal and state FWS offices reviewed the INRMP early in the review process (e.g. Contaminants Branch, Migratory Birds, etc. When the FWS primary POC does not assist in engaging the other departments of the FWS there are issues related to agreement on the INRMP. As it is, INRMPs have been received by external departments very late in the process when the document was essentially being submitted for final review and concurrence/agreement.
    - Because the size of the Installation Restoration planning documents can easily overwhelm the INRMP, the INRMP should reference the Installation Restoration documents; likewise, the other planning documents should be referenced in the INRMP if they cannot be incorporated in the Appendix due to size, etc.
    - Contamination issues may be relevant to the INRMP. State and federal FWS offices should seek out and review other relevant plans such as Installation Restoration planning documents.

Any plan that affects fish and wildlife should be coordinated with federal and state FWS organizations (i.e. CERCLA cleanup documents).

INRMP updates should address new MBTA guidance/regulations including but not limited to FWS's "Birds of Conservation Concern", bird conservation plans, migratory bird conservation, as applicable, per the MOU developed between FWS and DoD in accordance with Executive

Order 13186, and FWS supported guidelines for wind turbines, communication towers, and power lines, as applicable.

- **Relationship between Biological Opinions (BO) and INRMP.** Clarification was needed regarding how the INMRP interfaces with the Endangered Species Act Section 7 Consultation Process.
  - Separate consultation on the INRMP itself typically will be unnecessary unless the INRMP proposes management strategies materially different from those contained in the individual species' BOs that an installation has received previously.
  - It is not necessary to consult separately on an INRMP if the INRMP adopts the biological opinion recommendations.
  - The decision as to whether to consult is made at the installation and FWS Field Office level.
  - Documents, other than the INRMP, may be used to accomplish consultation, i.e. range use plans, etc.
  
- **Critical Habitat Determinations.** The group agreed there is a need to better understand how the new NDAA authority to allow INRMPs to substitute for critical habitat designation may affect the next round of revisions/updates to the INRMPs.
  - Some INRMPs in the current form may be adequate for substituting for critical habitat determinations.
  - It is the responsibility of the installation to provide data to document both:
    - INRMPs benefit to the species via the following criteria:
      - The plan provides a conservation benefit to the species
      - The plan provides certainty of implementation
      - The plan provides certainty that conservation efforts will be effective
    - Impact to national security (ESA sec. 4(b)(2))
  - There was general agreement that installations' INRMPs should wherever practicable, "contribute" to recovery, but should not bear the full burden of recovery (as implied by use of the term "conservation benefit")<sup>2</sup>.
  - New FWS guidance should address these points.

Other Notes:

- Consult with tribes regarding specific resources covered in INRMPs as they may have special significance and/or tribal rights associated with them.

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<sup>2</sup> Section 318 uses the term "benefit." The Miramar decision uses "conservation benefit" which implies recovery of the species. The California Red Legged Frog decision uses the term "conservation benefit."

- Achieve a consensus on what it means for an INRMP to be done. All “approving” agencies have a differing opinion and that issue should be well defined in further guidance from all agencies.
- Coordinate and solicit outside agency review of the FWS Draft INRMP Guidance.

## **II. IMPROVING THE INRMP PROCESS**

### **Questions Discussed**

How do you establish an effective team?

- When and how do you establish it?
- To what degree should you involve outside groups, now and into the future, regarding revisions, reviews, etc.?

How can installations report on implementation progress and effectiveness of the INRMP?

- Metrics?
- Reviews?

How can state and regional conservation priorities and plans be incorporated into INRMPs?

Should there be an INRMP template?

How can we codify recreational and joint land use restrictions into INRMPs? Is there any legal backing for this?<sup>3</sup>

### **Recommendations**

- **Establish an effective team based on individual installation needs.** The breakout group recognized that although we have passed the initial drafting of INRMPs, the time when teams would ideally be formed, this teaming has not occurred to the same degree at all installations. The group recognized that not all installations are equal, and that some may require more intensive teaming than others. The difference between an “installation team” and an “outside stakeholders” team was discussed and it was decided that the “installation team” is the vital one, while the “outside team” is dependent upon the installation situation.
  - Identify a “working group” with POCs, which shall include no less than representatives from FWS, DoD, and the State Fish and Wildlife Agency.
  - The team will meet a minimum of one time per year to discuss an annual review of the INRMP.
  - Each team will identify other stakeholders (reserves, NGOs, public) and decide when and how to engage.

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<sup>3</sup> This question was placed on hold and Jan Larkin offered to pose the question to general counsel before any further discussion takes place.

- If and when contractors are involved in the process, they need to be part of the collaborative team and understand that there is group/tripartite interaction regarding the INRMP.
- **Develop a “flexible” template.** The group discussed both the pros and cons of having an INRMP template. A significant advantage is that it allows for easier review by FWS and the States, who potentially have many different INRMPs to review. A caveat is that INRMPs are sometimes utilized as installation management plans and establishing a rigid template format may not mesh with an installation commander’s management style, making the INRMP harder to use on a day-to-day basis.
  - Develop a loose template where certain sections can be filled in as “non-applicable” where necessary.
  - Template should come from OSD so that the FWS and States can have some consistency in INRMPs for the different branches.
  - Template should exhibit similarity and a linkage to the comprehensive range plans (\*OSD to issue a template for range plans at some point in the future).
  - Part of the INRMP template should include an executive summary section for ease of review by the public, NGOs, and other stakeholders.
- **Establish multi-dimensional metrics in the form of an “annual report”.** There was a consensus that a report card of sorts, while not labeled a report card, should be established to measure the progress of INRMP plans. This evaluation, to be done on an annual basis, will facilitate the Sikes Act required review of the plan, and provide a consistent forum in which issues can be discussed.
  - Suggested metrics include measuring if the INRMP:
    - Supports the installation mission<sup>4</sup>
    - Supports other Federal, State and Regional missions (i.e. species recovery plans, conservation initiatives)
    - Furthers the conservation goals of species and their associated habitats
    - Provides a benefit to species as part of Section 318 of the NDAA of FY 2004
    - Results in the decision to “not-list” a species<sup>5</sup>
  - The report can be qualitative, (e.g. using red, yellow and green coding for different levels of accomplishment) but should be quantitatively driven.
  - Quantitative measurements may differ by installation needs.
  - There is a difference between implementation and effectiveness. The metrics should reflect those as different, noting that the latter may not be as simple to report in the short-term.

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<sup>4</sup> It was brought up that, by making the “mission support” criteria first, it could possibly be easier to motivate and engage the commander to utilize the INRMP as an on-going management plan, and establish implementation as more of a priority.

<sup>5</sup> This discussion revolved around the desire to capture in a quantitative manner, the pro-active efforts of installations that have helped to maintain a given species (e.g. slick spotted pepper grass in ID). Such a metric will need further flushing out to accurately capture these efforts.

### III. ENSURING IMPLEMENTATION SUCCESS

#### Questions discussed

How can we better utilize/improve DoD cooperative agreements for transferring dollars to get work done (i.e. species monitoring, research, etc)?

Should there be a standardized format/approach for cooperative agreements?

Should the “report card” be standardized across all the military services?

What constitutes an annual review? (See DoD guidance)

How can we enhance annual review of INRMPs?

How can installations successfully implement INRMPs if “must fund” projects are not being funded? How can you fund projects to help the installation provide for long-term sustainability?

Are we taking advantage of other non-traditional stakeholders (Ducks Unlimited, Pheasants Forever, etc.)?

#### Recommendations

- **Establish a standardized format/approach for cooperative agreements.** This will assist installations in developing/utilizing such agreements to get work done.
  - DoD should send out a guidance statement on the use of cooperative agreements to empower/encourage installations to use Sikes Act provisions in cooperative agreements.
  - Use Legacy funds to develop cooperative agreement guidance and template.
  - To reduce internal roadblocks, provide a legal blessing on how cooperative agreements can be used and with whom (i.e. Sikes Act Section 670c-1 for States and NGOs, Section 670f for DOI, and other regulatory authorizations).
- **Develop an “annual report” to assess INRMP implementation.** This report can be used by the Services to get feedback from FWS and State (stakeholders) on the effectiveness of INRMP implementation.
  - Navy should take the lead. Navy leadership wants to know what FWS and State think on how effectively INRMPs are being implemented. They are having a workshop in May to discuss the issue with FWS and State.
  - Such an “annual report” should be standard format throughout DoD, but flexible enough that the Services can incorporate specific items unique to their operation.

- Installations should use DoD format to establish metrics and provide data to FWS and State for use in evaluating INRMP implementation.
  - The “annual reports” are for an installation and its partners’ use, not for outside parties. They are also for each of the services to evaluate the success of the INRMPs.
- **Establish a formalized process for annual reviews of INRMPs.** Provide guidance on what constitutes the need for an INRMP revision. Involve stakeholders in prioritizing project efforts during annual review.
  - DoD should expand existing policy and establish a process for annual coordination with INRMP partners.
  - Installations should initiate the annual review process with the parties. The parties should be made aware of and accept the annual review process.
  - Annual reviews should be a means for determining when INRMP revision/updates are necessary. Installations should consider adding meeting minutes, revised project lists/priorities, and possible “report card” as an addendum to the INRMP.
  - Have stakeholders meet with commanders/supervisors and communicate the urgency/need to procure funding for all “must fund” projects. Successful implementation means funding such projects, so stakeholders’ concerns may be the impetus in getting the necessary funds.
  - An administrative record should be kept of all communications on INRMP reviews.
- **Promote establishment of cooperative agreements with non-traditional stakeholders.** Utilize the expertise and resources of outside groups to further INRMPs implementation and effectiveness.
  - Initiate an effort, possibly the Legacy project, to capture all existing cooperative agreements with non-governmental agencies (NGOs). Have the list available on DENIX, so installations have easy access to it.
  - Possibly establish cooperative agreements at Services’ higher headquarters level for installations to utilize.

#### **IV. THE WAY FORWARD**

Heidi Hirsh gave a brief overview of the POM process. (See attached document)\*

After the breakout groups reported ideas and recommendations back to a full session of participants, the groups broke off again to discuss questions regarding next steps. Through individual small group discussions and dialogue, the following steps were recommended.

## Recommendations

- **Develop Sikes Act MOU.** The group discussed possible topics to address in the proposed Memorandum of Understanding. Possible Sikes Act MOU topics include:
  - MOU should be a three party agreement (FWS, DOD and IAFWA)
  - Address authorization on cooperative agreements
  - Define responsibilities of the parties
  - Formalize the Core Group
  - Address the new understanding regarding review vs. revision of INRMPs
- **No Need for Sikes Act Legislative Relief.** The group addressed the possible need for legislation, particularly with respect to securing extensions or other relief from the five-year INRMP review process. The group concluded that no relief is needed, given the newfound clarity regarding the review/revision requirements of the Sikes Act.
- **Develop a Framework for INRMP Metrics.**

The group spent some time on the topic of metrics to measure program success. It was recognized that metrics could produce misleading results. The current metrics are found in the DoD guidance and they relate to the annual report to Congress.

### The following suggestions were offered:

- Consider development of metrics to measure INRMP effectiveness (i.e. see Marine Corp guidance)
- Consider measuring success of INRMPs at the species level as opposed to the installation level
- Incorporate the three Section 318 criteria in INRMPs as well as using them as standards for metrics.
- Bottom line is to assess:
  - How well does the INRMP team at the local level work together?
  - What will help commanders/leadership measure success?
- Success is based on goals set at the beginning and adjusted/updated throughout the process
- **Establish Sikes Act contact lists.**
  - Develop POC list and contact information for all the installation, FWS, and State personnel involved in Sikes Act implementation.
  - Establish a “living” list of FWS primary Sikes Act coordinators.
  - Have these lists available on DENIX or other sites for easy access.
  - Federal land management agencies are a target audience for certain training sessions (see below).
- **Develop and carry out training sessions.** Both broad and specific topic-oriented courses targeted at certain parties would be useful in INRMP planning and implementation. Training targeted at the individual needs of DoD/Military staff and FWS/State staff could be effective.

- Use Legacy funds to set up a training program on the Sikes Act and go over essential aspects, such as what is a revision, when is it required, NEPA, etc.
  - Potential course ideas include:
    - Develop and pilot a joint services Sikes Act Training course at NCTC to later take on the road.
    - Build an overview course on natural resource management for DOD personnel and executives/ Federal land managers
    - Develop a tripartite training class for individuals at DoD, FWS, and State who are new Sikes Act implementers.
    - Address integrated training area management and reserve ITAM (Integrated Training Area Management) slots for FWS staff.
  - Utilize already existing training resources:
    - Hold training at NCTC or host regional workshops.
    - Use existing courses at NCTC addressing topics such as ESA, contaminants, fisheries, migratory birds, etc. in whole or in part.
    - Use CECOS (Civil Engineer Corps Officers School) to host joint services training.
    - Identify relevant existing NCTC courses/material to insert into a CECOS course.
    - Establish a DoD liaison/representative at NCTC.
    - Work with NCTC to develop a quality/efficiency training course.
  - Assign the Core Group the responsibility to follow up on these suggestions.
- **Export information from this meeting.** Share this information with other regions and establish workshops related to topics discussed at this meeting.
  - Share efforts/results of this meeting with field offices and installations and give them some ownership in the process.
  - Contact field offices and installations in other regions and see if they are interested in establishing a similar workshop.
  - Due to funding issues, workshops should be set up so individuals can participate via teleconference or videoconference.
  - To not delay implementation of this workshop's efforts, adapt, as necessary, outcomes of other workshops as future updates to the process.
- **Regional Workshops.** The group discussed the use of regional workshops. Possible objectives for such a workshop could be to translate the format and content of this workshop to a more local/regional level. No clear consensus was reached. Various options were posed:
  - Expanding upon this workshop and applying at regional level
  - Consider if it should be a workshop vs. training
  - Possibly host as teleconference due to travel constraints
  - Have Training in coordination with other meeting such as the National Military Fish and Wildlife Association meetings where large numbers of DoD natural resources managers are concentrated in one location.

- Convene workshops targeted at cultivating partnerships and focusing on local implementation
  - Pilot a state-wide meeting/workshop
  - The Core Group will take these suggestions for follow-up
- **Specific Opportunity: Conservation Workshop.** DoD is holding an INRMP Workshop on August 22 as part of the DoD Conservation Conference to address natural resources and INRMPs. Suggestions were made for topics to address at the workshop including:
  - Survey FWS field offices perspectives on Sikes Act/INRMP responsibilities
  - Provide general update on MOU and guidance
  - Provide summary of decisions/recommendations from this workshop (i.e. regarding review/revision matter)
  - Invite DOI Assistant Secretaries
  - Educate on the new authorities to use INRMPs as substitutes for critical habitat designation; explain the annual review requirements (Section 318)
  - Incorporate Migratory Bird information from
    - DoD DENIX website
    - FWS Migratory Bird website
    - FWS field offices
  - Discuss value of combining INRMPs with integrated cultural resource management plans. (i.e. how much dilution can you stand?)
- **Establish INRMP Strategic Plan.** In addition to the action items identified throughout this workshop, additional items for consideration in the INRMP Strategic Action Plan/Way Forward include:
  - Develop strategic effort to engage states in reviews/revisions
  - Delay identification of INRMP pilots – it is perhaps too early?
  - Explore possible sources for funding Federal and state FWS programs to support INRMP process (development through implementation)
    - Legacy funding for a few pilot INRMPs
    - Existing DoD or Service program funding
    - Outside sources of funds
- **Change “INRMP Strategic Plan” to “INRMP Strategic Action Plan”**
  - Establish specific actions and set time frames for their development/completion:
    - Regional Workshop(s)
    - Develop Sikes Act 101 course
    - List of Sikes Act POCs
    - Develop measures of merit/metrics
    - Establish/implement “annual reports”
    - Develop/update Commanders’ Guide(s)
    - Develop funding “toolbox” – describe various options for securing natural resources funds

## **PRESENTATIONS AND PANEL DISCUSSIONS**

**Jim Van Ness** (OSD) gave an overview of why the DoD sought the Sikes Act legislation, particular to critical habitat, and presented some general framework on how INRMPs can be a tool that allows the balancing of species and defense needs. He noted that those needs do in fact overlap.

**Benjamin Tuggle** (FWS) spoke briefly about the need for INRMPs to include all species. He raised the question of how the INRMP process can overcome the limitation of FWS resources and stressed that FWS needs to be involved in the INRMP process as early as possible. He concluded by stating that FWS is serious about a partnership with DoD in conservation matters.

**Gary Taylor** (IAFWA) outlined IAFWA and State expectations from the meeting; gaining ground in developing better and more effective INRMPs. He quoted the congressional floor remarks of Don Young (AK) regarding the NDAA, stating that, “meeting objectives for military readiness and wildlife conservation and natural resource conservation are not mutually exclusive, but rather mutually beneficial.”

**Peter Boice** (OSD) gave a presentation on the background of the Sikes Act and talked about the October 2002 DoD guidelines for handling Sikes Act Amendments (this document was included in handout material for all participants). He suggested a variety of topics that could be discussed over the course of the workshop including; updating metrics and guidance, evaluating best practices, and formalizing an MOU.

**Bruce Beard** (OSD) gave a presentation on the cooperation needed for successful INRMPs and urged that an “INRMP strategic plan” should be a product of the workshop.

### **Panel Presentations**

#### I – Planning for INRMP Revisions

Laura Henze (FWS) facilitated the panel.

Panel members included:

Rich Clewell, DoD, IMA, NW Region

John Bardwell, USFWS, HQ

Paul Ebersbach, DoD, Avon Park Range

Melody Ray-Culp, USFWS, R4 - Vero Beach FO, Avon Park AFB

Discussion centered on the Avon Park AFB and Range.

The base is not “typical.” It provides service to various groups including ANG, Navy and Air Force. How they cater to different groups and the large number of T&E species on the land was presented.

There are 14 listed species and a wide variety of habitats and wildlife communities. Melody Ray-Culp gave a case study of the Florida Scrub Jay, among other species.

## II – Improving the INRMP Process

Jim Van Ness (OSD) facilitated this panel discussion.

Panel members included:

Col. James Uken, DoD, Barry M. Goldwater Range

Ken Quigley, DoD, USMC, Camp Pendleton

John Morgart, USFWS, R2-Cabeza Prieta NWR

Larry Voyles, States, AZ Game and Fish Dept.

Discussion centered upon the BMGR INRMP collaborative process. BMGR has many outside stakeholders and is the “Cadillac” model of collaboration. How this applies to installations of differing sizes and circumstances was a questions brought up for breakout group discussion.

## III - Ensuring Implementation Success

Gary Taylor (IAFWA) facilitated this panel.

Panel members included:

Derek Halberg, DoD, US Army, ARNG

Janet Norman, USFWS, R5 – Chesapeake Bay Field Office

Bruce Rosenlund, USFWS, R6 – CO Field Office

Angelina Binder, DoD, Mountain Home AFB

Tracey Trent, States, ID Fish and Game Department

Discussion centered on the Orchard Training Area. The case of the Slick Spotted Pepper Grass and its avoided listing was provided as a success story. The grass is found on both public and private lands and offered an opportunity for conservation collaboration with private landowners. Janet Norman from the Chesapeake Bay FWS field office gave a presentation on working with outside stakeholders and using non-traditional resources to accomplish INRMP goals (e.g. enlisting volunteers, engaging outside groups).