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**Subject:** draft timeline for proposed exchange  
**Date:** Wednesday, April 16, 2025 11:07:19 AM  
**Attachments:** [Realty timeline ARD edits 20250409 0700.xlsx](#)

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Paul-

Per your request, attached is a draft timeline for proposed exchange between FWS and SpaceX. The timeline reflects the most expedited schedule possible, with a number of assumptions outlined in the spreadsheet. A number of those assumptions lie outside the region's control, with the most critical of those being:

1. Additional capacity: the region needs a dedicated realty specialist if there is any chance of meeting this schedule. In addition, we need to fill the SpaceX liaison position as that day to day coordination will be essential. These 2 positions and a deputy realty chief are identified further in the timeline.
2. Expedited appraisal action: In discussions with AVSO, they have stated that with their existing capacity, even under an expedited timeframe, it would take at least 12 months to complete the appraisal component. We have put 6 months down as the timeframe if identified as a Secretarial priority. Unclear if that is doable—will definitely take Dept level engagement.
3. We have also identified where we have made assumptions about timelines for SpaceX led actions. We have not shared this document with them yet (we plan to after you have had a chance to review). Our experience is it is best to clearly identify responsibilities and timelines for all project proponents.

Happy to have discussions this week, or Stewart can lead those discussions with the regional refuge team next week.

Step #	ACTION	Expected Timeframe	Optimum timeframe (with conditions met)	Cumulative timeline (with optimum times)	RESPONSIBLE PARTY	CONDITIONS	COMMENTS
1	Hire permanent full-time GS12 Realty Specialist, permanent full-time GS13 Supervisory Realty Specialist, and SpaceX Liaison position	Concurrent with SpaceX steps 1-4	N/A	0	FWS	Waiver approved	focus on SpaceX work to ensure FWS timeline can be met. Realty Specialist requires close supervision to ensure schedule adhered to and quality and consistency with legal mandates. Need vacant SpaceX Liaison filled to meet the optimum timeline to dedicate efforts to planning and ongoing
2	Secure ownership of all properties	Not part of FWS timeline	N/A	0	SpaceX	All properties must be acquired by General Warranty Deed (GWD)	DOJ will not accept properties conveyed by anything less than GWD and only able to create exchange with SpaceX owning all properties
3	Archaeological Resources Protection Act (ARPA) and the National Historic Preservation Act (NHPA) Survey of both US and SpaceX properties	Not part of FWS timeline	N/A	0	SpaceX	Assumes SpaceX contracts work	If cultural resources found, it may require additional time to draft a conservation easement to protect the resources. It is also possible the protections required conflict with the intended use of the property by SpaceX and we would have to select new properties. The delay includes consultation with the State and possibly Tribes and attorney review/negotiations between all parties. This is likely to delay for at least 6 months to 1 year.
4	Title Reports and Documents	Not part of FWS timeline	N/A	0	SpaceX	Assumes SpaceX contracts work	FWS has difficulty with timely responses with title companies in area. Also ensures feasibility of properties.
5	Phase I Environmental Site Assessment Survey	Not part of FWS timeline	N/A	0	SpaceX	Assumes SpaceX contracts work	Must be started prior to start to ensure feasibility of properties. Timeline increased for reclamation if contaminants found or different property chosen
6	Complete National Environmental (NEPA), National Historic Preservation Act (NHPA) Section 106, Endangered Species Act Section 7 Analysis for the lands to be divested (Refuge land), CD and Net Benefit analysis	6 months	3 months	0y 3m	FWS	SpaceX Contract Need vacant SpaceX Liaison filled to meet the optimum timeline to dedicate efforts to planning and ongoing coordination.	3 months includes the comment period, notice to Tribes, internal and external review and response to comments. 45 days for comment/Tribal. Start on this ASAP (background information and prepare for public comment and Consultation).
7	Fully executed Agreement To Initiate (ATI)	3 months	2 months	0y 3m	FWS and SpaceX	Done concurrent with NEPA or before NEPA	Required before initiation of appraisal Statement of Work. Includes vetting by solicitor.
8	Appraise Refuge Land and SpaceX Land	12 months	6 months (1 month concurrent, 5 additional months)	0y 8m	AVSO or SpaceX	Reduce timeframe with a third party appraisal contracted by SpaceX. Possibly timeframe to 6 months, with 30 days concurrent with NEPA (while drafting scope of work).	Appraisal and Valuation Service Office (AVSO) states complexity, contracting, staffing, and hypotheticals/reservations requires 12 months even as priority. Use of the conservation easement requires a three-way exchange process which adds additional Solicitor review. Reduced timeframe for contracted appraisal may be more than 6 months if appraiser cannot be scheduled.
9	Offer and Acceptance	1 month	1 month	0y 9m	FWS and SpaceX	SpaceX runs it quickly through their corporate structure	External timeline
10	Funding for equalization payment	9 months	0 months	0y 9m	FWS	Secretarial priority – Inholdings/Emergencies for FWS funding - Timeline can be reduced to zero if SpaceX donates any equalization payment owed by SpaceX to FWS	FWS requires a clear conservation increase with the properties acquired to meet Compatibility and Exchange Policies. External timeline

11	Director Approval and Congressional Notice	3 months	2 months	0y 11m	FWS	Secretarial priority to streamline surname and signatures	Many approvals required and 30-day Congressional notice
12	Due Diligence	1 month	1 month	1y 0m	FWS	Expedited timeline	Survey and Title curative done concurrently with other steps, Certificate of Inspection and Possession and Certificate of Rights of Way, Easements, and Reservations completed at this time
13	Preliminary Title Opinion by Solicitor	1 month	1 month	1y 1m	SOL	Secretarial priority for fast turn-around	
14	Escrow and Closing	3 months	3 months	1 y 4 months	FWS, SpaceX, and Title Company	Dependent on External timelines	Realistic timeline even as a priority

SUMMARY OF NEEDS:	FWS	Priority 1: Permanent GS-12 Realty Specialist (Step 1)	Priority 2: Permanent SpaceX Liaison (Step 6)	Priority 3: Permanent GS-13 Deputy Realty Officer (Step 1)
	DOI	Priority 1: Expedite AVSO/Appraisal (Step 8)	Priority 2: Expedited Solicitor Review and support (Step 8 and 13)	
	SpaceX	Priority 1: Contract compliance work (steps 2-6)	Priority 2: Contract 3rd party appraisal (Step 8)	