## **INTERNATIONAL DARK-SKY ASSOCIATION**

3223 N First Ave - Tucson Arizona 85719 USA - +1 520-293-3198 - www.darksky.org

TO PRESERVE AND PROTECT THE NIGHTTIME ENVIRONMENT AND OUR HERITAGE OF DARK SKIES THROUGH ENVIRONMENTALLY RESPONSIBLE OUTDOOR LIGHTING



# International Dark Sky Sanctuary Program Guidelines

June 2018

## **TABLE OF CONTENTS**

DEFINITION OF AN IDA INTERNATIONAL DARK SKY SANCTUARY	3
GOALS FOR INTERNATIONAL DARK SKY SANCTUARY CREATION	3
DESIGNATION BENEFITS	3
ELIGIBILITY (ALL MUST BE MET)	4
MINIMUM REQUIREMENTS FOR ALL SANCTUARIES	4
LIGHTING MANAGEMENT PLAN GUIDELINES	6
LIGHTING INVENTORY	8
PROVISIONAL STATUS	9
IDSS APPLICATION PROCESS	10
Nomination	10
STEPS FOR APPLICANT	
TO BE INCLUDED IN AN IDSS APPLICATION	11
IDA REVIEW PROCESS	13
POST-DESIGNATION REVIEW AND MAINTENANCE	14
REASSESSMENT OF IDSS DESIGNATIONS	15
INVESTIGATION AND DUE PROCESS	15
REINSTATEMENT FOLLOWING SUSPENSION	15
SALE OR TRANSFER OF LAND OWNERSHIP	16

## **DEFINITION OF AN IDA INTERNATIONAL DARK SKY SANCTUARY**

An International Dark Sky Sanctuary (IDSS) is a public or private land possessing an exceptional or distinguished quality of starry nights and nocturnal environment, and that is specifically protected for its scientific, natural, or educational value, its cultural heritage, and/or public enjoyment. An IDSS differs from a Dark Sky Park or Reserve in that it is typically situated in a very remote location with few (if any) nearby threats to the quality of its dark night skies and does not otherwise meet the requirements for designation as a Park or Reserve. The typical geographic isolation of Sanctuaries significantly limits opportunities for public outreach, so an IDSS designation is specifically designed to increase awareness of these fragile sites and promote their long-term conservation.

## GOALS FOR INTERNATIONAL DARK SKY SANCTUARY CREATION

- To recognize public or private lands and their surrounding communities in some
  of the darkest locations on Earth for exceptional commitment to and success in
  local implementation of the ideals of dark sky preservation
- To promote sustainable ecotourism and astrotourism
- To further the protection of nocturnal habitats, public enjoyment of the night sky and its heritage, and identification of areas ideal for professional and/or amateur astronomy
- To encourage land owners/administrators, conservation professionals, surrounding communities and private interests to identify dark skies as a valuable resource in need of proactive conservation
- To provide international recognition for such locations
- To encourage other sites to become environmental leaders on dark sky issues by communicating the importance of dark skies and by providing an example of what is possible with proper stewardship

## **DESIGNATION BENEFITS**

Achieving an IDSS designation celebrates the efforts made by any public or private organization in protecting the natural nighttime environment of the identified Sanctuary. It encourages the sustainability of actions already undertaken in the area, and enhances resident and visitor awareness of environmental stewardship and responsibility.

Designation as an IDSS entitles the Sanctuary to display the IDA logo in official publications and promotions and retain the use of this logo by affiliated groups. IDA will promote and highlight ongoing Sanctuary efforts to protect night skies, and maintain pages on its website identifying and describing all IDSSs.

## **ELIGIBILITY (ALL MUST BE MET)**

To be eligible for consideration as an IDSS, a candidate Sanctuary must meet all of the following requirements:

- 1) A proposed IDSS must be a public or a private land legally protected for scientific, natural, educational, cultural, heritage and/or public enjoyment purposes.
- 2) The IDSS must provide an opportunity for regular public nighttime access, with or without supervision. A portion of designated land may meet this requirement, or access must be available for a substantial fraction of any given nights. In some cases, such as when working with areas that protect endangered wildlife, archaeological sites, or other sensitive resources, this requirement may be waived or adjusted to meet important conservation goals.
- 3) In order to ensure public accessibility on private lands, the landowner(s) must allow the public to transit any part(s) of the property not included in the formally declared IDSS as required to reach designated viewing areas.
- 4) The Sanctuary must provide an exceptional dark-sky resource where the night sky brightness at the zenith is routinely equal to or darker than 21.5 magnitudes per square arcsecond in the visual band<sup>1</sup> and where significant light domes are not present toward the local horizon in any direction.

## MINIMUM REQUIREMENTS FOR ALL SANCTUARIES

1) A quality comprehensive Lighting Management Plan (LMP) must be adopted by the agency administering the proposed IDSS. The LMP regulations must be binding upon all private and public landowners within the area of protection. Certain exceptions to this requirement may apply but are subject to IDA approval. Minimum

<sup>&</sup>lt;sup>1</sup> These conditions correspond approximately to a zenith luminance of 0.25 mcd/m<sup>2</sup> and a naked-eye limiting magnitude (NELM) of +6.7.

- standards are described below in the section titled "Lighting Management Plan Guidelines".<sup>2</sup>
- 2) Evidence of commitment to dark skies and quality outdoor lighting as demonstrated by at least two-thirds (67%) of existing outdoor lighting fixtures in the IDSS conforming to the requirements of the Lighting Management Plan at the time of application.
- 3) A schedule on which 90% of all outdoor lighting in the IDSS will conform to the Sanctuary's LMP within five (5) years of receipt of an IDA designation and a written commitment that 100% of the lighting will conform within ten (10) years of the designation.
- 4) A sky brightness measurement program must be established and maintained either by the Sanctuary administering authority or by another public or private organization (university, research center, IDA chapter, astronomy club, etc.) to follow the evolution of light pollution in the IDSS and ensure that the night sky quality does not degrade over time. Applicants are encouraged, but not required, to submit their measurements to the citizen science projects such as My Sky At Night (myskyatnight.com) and Globe At Night (globeatnight.org).
- 5) A description of current and potential future threats to dark skies over the Sanctuary.
- 6) The importance of dark skies/natural darkness and the benefits of quality lighting are paramount in Sanctuary external communications. If the Sanctuary typically provides interpretive programs, then dark skies must be one of the central themes communicated through on-site interpretation<sup>3</sup>. If interpretive programs are not typically offered, then publications, flyers, press releases, media, or other outreach are appropriate substitutes.
- 7) Dark skies in the protected area are acknowledged as an important scientific, natural, cultural, and/or scenic resource value by jurisdictions higher than community

<sup>3</sup> 'Dark skies education' refers not only to astronomy education but also education about wildlife, energy efficiency, safety, and human health. Astronomy education events such as star parties only count as 'dark skies education' if they prominently feature material about dark skies and outdoor lighting.

<sup>&</sup>lt;sup>2</sup> Lighting required by law under the authority of any entity having higher legal jurisdiction over the Sanctuary may be formally exempted from the requirements of this section.

- level (e.g., county, province, state, etc.), as shown by the inclusion of appropriate language in official documents<sup>4</sup>.
- 8) Once established, the Sanctuary must erect and maintain appropriate signage indicating the International Dark Sky Sanctuary designation along a roadway entrance, along a footpath entrance if no roadway exists, or in a similar setting. If approved by IDA, language as an alternative to "International Dark Sky Sanctuary" may appear on the signage and in Sanctuary communications regarding the IDSS status. Once the sign is erected a photograph documenting this sign must be taken and sent to IDA for records along with a description of its location.
- 9) Night sky quality must be established through all of the following:
  - A) The core of the Sanctuary must have identified the sources of light pollution through calculations, maps, photographs or any other proper method AND clearly identify actual present and anticipated future threats to the night sky quality. A plan must be put in place to address these current and future threats.
  - B) A determination of whether the minimum sky quality standard<sup>5</sup> has been met through sky brightness measurements made via an IDA-approved data collection method. Measurements must be distributed over a sufficiently long enough period of time in order to average out fluctuations over timescales ranging from nights to seasons in length. Applicants should discuss their measurement protocol with the International Dark Sky Places Program Manager.

## LIGHTING MANAGEMENT PLAN GUIDELINES

The LMP must contain at least the following minimum provisions:

 The written policy meets or exceeds applicable agency or departmental policies regarding outdoor lighting and conforms to all applicable local, regional, and national laws.

<sup>&</sup>lt;sup>4</sup> Examples of such documents include General Management Plans, Resource Management Plans, and Facility Development Plans. Consult IDA staff as to whether a particular type of management document meets this requirement.

<sup>&</sup>lt;sup>5</sup> Any designated IDSS that no longer meets this standard will be included in a List of Endangered Sites published on the IDA website. IDA reserves the right to suspend or revoke the IDSS designation of a Park with night sky quality that falls below the minimum requirement.

- 2) The use of outdoor light at night is only prescribed when it is strictly needed, where it is needed, and in the appropriate amount for a specific task. The purpose of outdoor light that is allowed under the policy should be specifically to ensure public safety.
- 3) All outdoor lighting fixtures must be fully shielded<sup>6</sup> irrespective of purpose or the number of lumens of light it emits, and make appropriate use of timers and motion sensors;. Lighting controlled with motion-activated switches limiting the duration of illumination to less than five (5) minutes after activation is exempt from the other requirements of this section.
- 4) Lighting must be chosen to minimize the amount of short-wavelength light emitted into the nighttime environment. The Sanctuary's LMP must restrict lighting in this respect according to one of the following prescriptions:
  - A) The correlated color temperature (CCT) of lamps must not exceed 3000 Kelvins; **OR**
  - B) Allowed lighting must not emit more than 25% of its total spectral power at wavelengths < 550 nanometers; **OR**
  - C) The scotopic-to-photopic (S/P) ratio of allowed lighting must not exceed 1.3.

These metrics may be found listed in manufacturer data sheets for lighting products.

- 5) Visitor activities with respect to the introduction of unnecessary artificial light at night into the Sanctuary environment are regulated. This must include reasonable limits on the lighting of camping equipment and recreational vehicles, as well as a general prohibition of inappropriate "light painting" and similar. Note that this requirement is in no way intended to compromise visitor safety.
- 6) Operation of illuminated signs<sup>7</sup>, except those strictly required for wayfinding, is prohibited. Any permitted illuminated signs shall adhere to the following regulations:

<sup>&</sup>lt;sup>6</sup> "Fully shielded" is defined such that the light source is screened and its light directed in such a way that none is emitted above the horizontal plane passing through the lowest light-emitting portion of a fixture.

<sup>&</sup>lt;sup>7</sup> "Illuminated sign" is defined here as any informational or advertising sign that is illuminated by either internal or external means. Descriptive terms are adjusted here accordingly according to the type of illumination.

- A) Displays must be single-color on a black background; AND
- B) Luminance after sunset may not exceed 100 nits (100 candelas per square meter).

## LIGHTING INVENTORY

A lighting inventory is a formal audit of all outdoor lighting in a Sanctuary. It is used to determine rates of compliance with the LMP and to identify lighting equipment in need of rehabilitation through retrofitting or replacement. A complete inventory of outdoor lighting in the Sanctuary is a requirement for IDSS status, and it must be accompanied by a plan under which Sanctuary lighting will be brought into compliance with the LMP under the terms specified in "Minimum Requirements for All Sanctuaries" (above).

The following must be taken into consideration when collecting and reporting lighting inventory data:

- 1) When there are numerous outdoor lights it is acceptable to group lights by facility or area. Whether the fixtures are fully-shielded, are special purpose fixtures under 500 initial lumens total, and what the lighting application is must be noted for each fixture or group of fixtures.
- 2) Daytime photographs, or manufacturer diagrams/cut sheets if available, of each fixture type must also accompany the inventory.
- 3) Inoperable fixtures must be inventoried. Only those fixtures physically disconnected from power supplies may be counted as compliant for the purpose of determining the rate of LMP compliance.

A sample table from portion of a Lighting Inventory is shown on the following page.

Location	Fixture	Fully- Shielded?	Operable?	Special Purpose <500 lu- mens	Application	Conformity with LMP
Visitor Center	12 fixtures on 14' pole, 70 W HPS	YES	YES	NO	Parking log, timer off at 10pm	YES
	2 door lights, 100 W MH	YES	NO	NO	Building egress	YES
	6 bollard (post) lights, 32 W CFL	NO	YES	NO	Walkway	NO – see plan
Restrooms	2 carriage style lights at doorways, 40 W incan- descent	NO	YES	YES	Historic Preserva- tion, egress	YES
Maintenance Yard	6 wall packs, 250 W MH	NO	YES	NO	Occasional night opera- tions	NO – see plan
	8 Glarebust- ers, 11 W CFL	YES	YES	NO	Egress, se- curity	YES

## **PROVISIONAL STATUS**

In some cases, a location interested in becoming an International Dark Sky Sanctuary may lack the resources to satisfy all the requirements set forth in this document. If certain minimum standards have been met, a Sanctuary may apply for and be granted Provisional status at the discretion of the IDA Board of Directors. Provisional status recognizes the Sanctuary's ongoing work toward full designation and is intended to be used as leverage to enable the necessary lighting retrofits.

Provisional status expires after three (3) years. At any time before the end of the provisional period, a Sanctuary may reapply for full status. Material submitted for the consideration of full status may be an addendum to the initial application provided the material includes a current assessment of night sky quality, goals, outreach, and programs listed in the original application.

A Sanctuary may apply for Provisional status if all of the following conditions are met:

- 1) A Lighting Management Plan has been approved by the Sanctuary managing agency;
- 2) Initial sky quality measurements indicate that the minimum night sky quality criteria are fulfilled;
- 3) An inventory of outdoor lighting in the sanctuary; and
- 4) Appropriate outreach efforts have been undertaken.

Applicants requesting Provisional status should send a nomination package to support IDA that contains at least the following information:

- Documented intent to create and support an IDSS
- Initial sky quality measurements
- A Lighting Management Plan
- An action plan describing how the aspiring Sanctuary will meet minimum requirements within three (3) years of receiving the Provisional status

## **IDSS APPLICATION PROCESS**

#### **N**OMINATION

The nomination may be initiated by an qualified IDA member nominator<sup>8</sup>. Alternately, the Sanctuary may join IDA as an organizational member and self-nominate. Nominators are encouraged to correspond with IDA staff and the Sanctuary throughout this process, from initial contact with IDA through submission of the final nomination package.

In addition, the application must include evidence, such as in the form of a letter of

<sup>&</sup>lt;sup>8</sup> An "IDA qualified nominator" is defined as an individual or organization holding an IDA membership in good standing at the time that the IDSS application is submitted. The Sanctuary managing agency itself may join IDA as an organizational member and self-nominate.

support, from the Sanctuary managing agency, such as a superintendent or administrator, consenting to consideration for IDSS status.

## STEPS FOR APPLICANT

- Make initial contact with IDA by phone or email to discuss the process and receive guidance, followed by continued communications to consult with IDA staff and to review progress.
- 2) Designate a formal point of contact (POC) person, such as a project manager, and provide that person's name, telephone number, address, and email information to IDA staff. Before and after designation any changes to this POC, or his/her contact information, must be communicated to IDA immediately in order to ensure continuous communication at all times.
- 3) Obtain a letter of nomination from a qualified IDA member nominator, as well as a supporting letter from the Sanctuary managing agency. Solicit additional letters of support from community organizations, clubs, groups, universities, etc.
- 4) Send the completed application in PDF or Microsoft Word format to IDA staff for preliminary review at least one month before the chosen submission deadline date. IDA staff will confirm that the application is complete and ready for submission or else return it with comments and suggestions for improvement.
- 5) Submit the final application in plenty of time for IDA staff to review and prepare your application to make the bi-monthly deadline that you prefer. Requests to rush applications will **NOT** be honored. Planning well ahead is therefore essential if the proposed Sanctuary is planning to meet a particular deadline.

## TO BE INCLUDED IN AN IDSS APPLICATION

- 1) Map(s) of the area to be designated clearly indicating the Sanctuary's legal boundaries and its geographic context.
- 2) Letters of nomination from an IDA member nominator and the Sanctuary administrative authority.

- 3) Any management documents<sup>9</sup> supporting dark skies and/or natural nighttime darkness as a valued natural resource.
- 4) Documentation of sky quality, light pollution measures, satellite images, maps, photographs, or other evidence that demonstrates the noteworthiness of the Sanctuary's dark-sky resource. Measurements of night sky brightness must be obtained using IDA-approved night sky brightness measuring equipment. Measurements must document the approximately darkest and brightest areas of the Sanctuary. Data included in the application must contain an updated night sky brightness survey of the Sanctuary completed no more than two years before the application's submission along with any other relevant information. IDA staff may be consulted for advice concerning how to establish a night sky brightness measurement and monitoring program.
- 5) Lighting Management Plan.
- 6) Lighting inventory and a plan to bring 90% of outdoor lighting into compliance with the Sanctuary's LMP within five (5) years of receiving an IDA designation, as well as a written commitment to bring the Sanctuary into 100% compliance within ten (10) years of designation.
- 7) Any documentation of the cultural/historical/scientific significance of the Sanctuary and ongoing efforts to preserve and promote these resources.
- 8) Description and documentation of any interpretive programs or products related to dark skies and natural nighttime darkness.
- 9) A summary of future plans for activities in the Sanctuary after receiving IDA accreditation.
- 10) Proposed wording of an alternative designation title (e.g. Dark Sky Wilderness, Dark Sky Refuge, etc.), if desired, along with a justification for the request.
- 11) If the candidate IDSS is a privately owned property, documentary evidence ensuring public access and transit outlined in the section "Eligibility", item 3.

12

<sup>&</sup>lt;sup>9</sup> Examples of such documents include General Management Plans, Resource Management Plans, and Facility Development Plans. Consult IDA staff as to whether a particular type of management document meets this requirement.

## **IDA REVIEW PROCESS**

Six (6) application submission deadlines occur in each calendar year, commencing in January and continuing every other month. Before the Sanctuary's final application is submitted, it is highly recommended that the Sanctuary be in regular communication with the International Dark Sky Places Program Manager to perfect the application before the next application deadline.

IDA staff forwards applications to the DSPC for review at the deadline. Endorsement of applications by the DSPC is by a 2/3 supermajority vote; otherwise, the DSPC will return applications with reasons for denial of an endorsement and specific recommendations for improvement. If endorsed, the applicants will be notified and the International Dark Sky Places Program Manager will present the application to the IDA Board of Directors (BOD). A ten (10)-calendar-day waiting period then commences during which the BOD has the right to deny IDSS status should it determine that any problems with the application exist.

If the BOD registers no objection within the ten-calendar-day waiting period, the IDSS designation is considered immediately awarded by IDA. The Sanctuary has the right to choose when the designation is made public, but it must organize the announcement to be made at the same time as the IDA public notice unless otherwise agreed by both parties. Along with the announcement notice, IDA will publish the Sanctuary's application on its website. By submitting the application, the Sanctuary agrees in advance that the application will be made publicly available.

If approved, the location is awarded the IDSS designation and listed along with their application on the IDA website. By submitting the application, the Sanctuary consents to its complete application and all supporting materials being made publicly available.

If an application is denied final approval by the BOD, a letter will be sent to the applicant outlining elements of the application that need improvement along with specific recommendations for ways to remedy any problems the BOD identifies. Applications may be resubmitted for future consideration after remediation is complete. Resubmitted applications will be considered without prejudice.

IDA realizes that certain circumstances surrounding a IDSS application may cause some potential authors of letters of support (or opposition) to feel uneasy about publicly declaring their opinions about the IDA designation. In the interest of providing the Dark Sky Places Committee with as full a picture of community sentiment about applications as possible, some letters may be suppressed from online publication if it is felt that making the letters publicly available will subject their authors to retaliation or harassment. A prospective IDSS seeking this protection for letter writers must make a formal written request. The International Dark Sky Places Program Manager must ap-

prove suppression of publication of any part of an application. Note that suppression of online publication does not prevent either the DSPC or the BOD from reading all submitted letters.

## POST-DESIGNATION REVIEW AND MAINTENANCE

The IDSS designation is not awarded in perpetuity. Rather, it is subject to regular review by IDA and possible revocation if the minimum program requirements are not maintained. More details may be found in the "Reassessment of IDSS Designations" section below.

To ensure that Sanctuaries remain exemplary in their protection and restoration of the natural nighttime environment, IDA will periodically reevaluate each site in the International Dark Sky Places Program. This is done to confirm that Sanctuaries continue to meet the minimum requirements and are making adequate progress toward LMP compliance goals outlined in this document.

Each designated IDSS must submit to IDA a written report of its activities related to the maintenance of its designation on or before 1 October of each calendar year. The report is a short (typically less than ten-page) synopsis of the Sanctuary's activities and initiatives during the intervening year<sup>10</sup>. The report should include dates and brief descriptions of any interpretive events, lighting retrofit projects, outreach efforts, etc. New measurements of the night sky brightness in the park must be obtained and included in the report. Samples of printed materials and press articles should also be included.

Annual reports should not be burdensome to produce, as they are intended as a compilation of information accumulated throughout the year. Annual reports and supporting documentation must be submitted electronically to the International Dark Sky Places Program Manager in either PDF or Microsoft Word format. If the annual report is not received by IDA in a timely fashion, IDA may suspend the location's IDSS status until the annual reporting requirement has been met (see the following section). On or about 1 August and 1 September of each year, the International Dark Sky Places Program Manager will remind local contacts at each IDSS of the pending 1 October annual report submission deadline.

A designated IDSS is exempt from the annual reporting requirement in the calendar year in which the IDA designation was awarded. If the designation is received after 1 October of a given calendar year, the IDSS's first annual report to IDA will be due on 1 October of the following calendar year.

14

<sup>&</sup>lt;sup>10</sup> Examples of acceptable annual reports are available on the individual IDSS pages on the IDA website.

## REASSESSMENT OF IDSS DESIGNATIONS

An IDSS designation is intended to represent the beginning of an ongoing relationship between the Sanctuary and IDA to our mutual benefit. IDA will periodically review the nature of that relationship in the required annual reports as described in the previous section. From time to time, IDA also receives comments from visitors to Sanctuaries that raise concerns about the veracity and timeliness of information provided to IDA by site administrators. IDA may, at its discretion, investigate claims in which it is alleged that IDSSs are not living up to commitments made to IDA and the public in their applications to the Program. This section details the IDA procedure for carrying out such investigations, and the rights of IDSSs in such matters.

## Investigation and Due Process

An allegation of impropriety concerning any of the elements of participation in the Program outlined in this document is subject to IDA investigation and potential disciplinary action including temporary suspension and/or permanent revocation of the IDSS designation. IDA staff shall perform due diligence in gathering facts concerning such allegations it deems credible, and will prepare a report of its findings for consideration by the DSPC. The DSPC commits to weighing the evidence fairly and impartially, and to seek to resolve disputes whenever possible through dialog. A Sanctuary subject to an investigation shall be notified in a timely manner and solicited for evidence contrary to the specifics of the allegation at hand. The Sanctuary will be given an opportunity to correct any deficiencies with regard to the Program guidelines established by the IDA investigation within a reasonable time period to be prescribed by the DSPC.

Failure to achieve consensus through these means risks a DSPC recommendation for suspension or revocation of the DSS designation. If made, such a recommendation will be forwarded to the BOD for formal ratification before coming into force. The BOD's decision on any disciplinary matters involving a IDSS shall be considered definitive and binding.

Any IDSS so investigated has the right to review the allegations against it and all factual information collected by IDA pertinent to the allegations.

#### REINSTATEMENT FOLLOWING SUSPENSION

If the DSPC recommends a suspension of an IDSS designation and the BOD ratifies the suspension, the Sanctuary administration shall be immediately notified. The status

of a suspended IDSS shall be changed to "Provisional" in all IDA communications until the designation is reinstated or revoked; however, the process of obtaining reinstatement of a designation is not the same as that outlined in the "Provisional Status" section of these guidelines.

To obtain reinstatement of a suspended designation, the IDSS must provide evidence to the DSPC's satisfaction that the specific issues identified by the DSPC as grounds for the suspension have been corrected and that all Program guidelines are once again met. The DSPC will consider the evidence presented by the IDSS and render a judgment to either

- Accept the reinstatement petition, OR
- Reject the petition and recommend revocation, OR
- Return the petition with further instructions and a defined deadline for a IDSS response.

A suspension left unresolved after one (1) year from the date of the BOD's assent to the suspension automatically becomes a permanent revocation. Revocation entails removal of the IDSS from IDA's roll of approved International Dark Sky Places, and from mention on the IDA website and in member and external communications. IDA reserves the right to take legal action against any former IDSS whose designation is duly revoked but continues to use the IDA name/logo in advertising, communications, and/or signage.

#### SALE OR TRANSFER OF LAND OWNERSHIP

IDA considers the rights and privileges outlined here in association with IDSS status to be simultaneously permanent and revocable. Furthermore, IDA requires that the responsibilities and obligations of the landowner(s) at the time IDSS status is achieved are incumbent upon all future landowner(s) if the Sanctuary lands are sold or their title is otherwise transferred to any other public or private owner. A new owner or owners may unilaterally withdraw from participation in the program at any time by indicating these wishes in writing; otherwise, IDA will hold a new owner or owners accountable to the provisions of these guidelines in perpetuity. Any failure of new ownership to abide by the conditions for continued participation in the program laid out in this document, whether indicated by withdrawal or abandonment of responsibilities, will cause IDA to take action as described above ('Investigation and Due Process') which may result in the permanent revocation of IDSS status.