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Submitter Information

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General Comment

Attached please find the Prairie Island Indian Community's comments on Revision 1 of the NRCs Tribal Protocol Manual: Guidance for NRC Staff (79 FR 71134) and the proposed NRC Tribal Policy Statement (79 FR 71136).

Attachments

PIIC Comments on Draft NRC Tribal Policy Statement 05 31 15

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LEGAL DEPARTMENT

May 31, 2015

Cindy Bladey, Chief
Rules, Announcements and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket ID: NRC-2012-~~2035~~ *0235*
NRC Tribal Protocol Manual and Proposed NRC Tribal Policy Statement

Dear Ms. Bladey:

On December 1, 2014, the U.S. Nuclear Regulatory Commission ("NRC") published a notices in the Federal Register requesting comments on Revision 1 of the NRC's "Tribal Protocol Manual: Guidance for NRC Staff" (79 FR 71134) and the proposed "NRC Tribal Policy Statement" (79 FR 71136). The Prairie Island Indian Community (the "PIIC," "Community," or "Tribe") offers the following comments and recommendations on the Tribal Protocol Manual and draft Tribal Policy Statement.

The Prairie Island Indian Community is a federally recognized Indian tribe organized under the Indian Reorganization Act of 1934. The Tribe's Reservation is located on the ancestral homeland of the Mdewakanton Dakota on Prairie Island, which is formed at the confluence of the Vermillion and Mississippi Rivers in southeastern Minnesota (approximately 35 miles southeast of the Twin Cities of Minneapolis and St. Paul, Minnesota). The Mdewakanton, "those who were born of the waters," have lived on Prairie Island for countless generations. The Tribe's current land base (including both trust and fee lands) has grown through various federal acts beginning in 1891 and direct purchases by the Tribal Council, and now totals over 3,000 acres (including both land and water).

The Prairie Island Indian Community is governed pursuant to its Constitution and By-Laws, adopted by tribal members on May 23, 1936, and approved by the Secretary of the Interior on June 20, 1936. The Constitution and By-laws provide that the Community Council (sometimes referred to as the "Tribal Council") shall be the governing body for the Community. The five-member Tribal Council consists of a President, Vice-President, Secretary, Treasurer, and Assistant Secretary/Treasurer.

The Prairie Island Nuclear Generating Plant Units 1 and 2 (“PINGP”), which is owned and operated by Northern States Power Company d/b/a Xcel Energy (“Xcel”), is located on the ancestral homeland of the Mdewakanton Dakota immediately adjacent to the Community’s current reservation. The PINGP has been on-line since the early 1970s and will operate at least until 2034, as the plant received approval from the NRC in June 2011 to extend its operating licenses for an additional twenty years. Xcel has been storing spent nuclear fuel on-site at its Independent Spent Fuel Storage Installation (“ISFSI”) since 1995. Xcel’s application to renew the ISFSI license for an additional 40 years is pending before the NRC. The ISFSI and its 38 dry casks are approximately 600 yards from the nearest Community residences. The ISFSI’s current license is for 48 casks, but a total of 98 will be needed if the PINGP operates until 2034.

The Community has a long history of working with the NRC (at both the regional and headquarters levels). Most recently, the Tribe has been a Cooperating Agency for the purposes of developing an Environmental Impact Statement for the PINGP license renewals and an Environmental Assessment for the ISFSI license renewal. We believe that our strong working relationship with the NRC, both at the regional and headquarters levels, is based on mutual respect and a shared goal of protecting people and the environment. We applaud the NRC for developing both the Tribal Protocol Manual and the Tribal Policy Statement that will serve as guidance for the NRC’s interactions with federally recognized Indian tribes.

General comments

Taken together, both the Tribal Protocol Manual and the NRC Tribal Policy Statement (and their respective Federal Register notices) provide important historical information, such as various treaties, Congressional Acts affecting Indian tribes and rights, and a discussion of the Federal Trust Responsibility. This information provides the proper historical context critical to understanding the unique relationship federally recognized Indian tribes have with the Federal Government. This point is underscored in the Tribal Protocol Manual, which notes that Indian tribes are not the public or special interest groups, but are, in fact, governments. This point is important in understanding why tribes desire to have a government-to-government relationship with the NRC and do not wish to be considered “stakeholders.”

Comments on the Six Policy Principles

The NRC Recognizes the Federal Trust Relationship and Will Uphold its Trust Relationship with Indian Tribes.

As an independent agency of the Federal government, the NRC shares the unique trust relationship with, and responsibility to, Indian Tribes. At the same time, the NRC’s actions must be in accordance with its authorizing statutes and regulations. The NRC shall respect Indian Tribal self-government and sovereignty, will honor Tribal rights, and meet responsibilities that arise

from the unique relationship between the Federal government and Indian Tribal governments.

From the NRC's "Tribal Protocol Manual: Guidance for NRC Staff" (NUREG-2173) at p. 9 (footnotes omitted):

The unique status of Tribes was explored in *Seminole Nation v. United States* (1942), where the Supreme Court explained that the Federal government is, "charged with moral obligations of the highest responsibility and trust." The Federal government has a trust responsibility to Federally recognized Tribes, which applies to all executive departments and Federal agencies that deal with Native Americans, including the NRC. For Federal agencies that hold Tribal assets, the trust responsibility establishes fiduciary obligations to the Tribes, including duties to protect Tribal lands and cultural and natural resources for the benefit of Tribes and individual Tribal members/ land owners. In comparison, as an independent regulatory agency, the NRC exercises its fiduciary duty in the context of its authorizing statutes, including the Atomic Energy Act (AEA), and implements any fiduciary responsibility by ensuring that Tribal members receive the same protections under implementing regulations that are available to other persons.

To Indian tribes, upholding a Trust relationship with Indian tribes means more to Indian tribes than just ensuring the tribal members receive the same protections that are available to other persons (i.e., the general public). In our view, the NRC is required to do more, not less.

The "trust responsibility" that the federal government owes to Indian tribes imposes both substantive and procedural duties on the federal government. This doctrine has its origin in *Cherokee Nation v. Georgia*, where Chief Justice John Marshall described Indian tribes as being "in a state of pupillage," with "[t]heir relation to the United States resembl[ing] that of a ward to his guardian."¹ The trust responsibility is a common law doctrine, although Congress has supplemented the doctrine from time-to-time via legislation. It imposes certain substantive duties on the federal government, including the duty to provide services to tribal members (e.g., health care, education), the duty to protect tribal sovereignty, and the duty to protect tribal resources.² The trust responsibility also includes a procedural component – the duty to consult with Indian tribes – which is necessary to effectuate these substantive components.³

¹ 30 U.S. 1, 17 (1831).

² Reid Peyton Chamber, *Judicial Enforcement of the Federal Trust Responsibility to Indians*, 27 *Stan. L. Rev.* 1213 (1975).

³ Gabriel S. Galanda, "The Federal Indian Consultation Right: A Frontline Defense Against Tribal Sovereignty Incursion," *Federal Lawyer* (Fall 2010).

When it comes to tribal resources, the trust responsibility is at its apex. The Supreme Court has noted that the conduct of federal officials must “be judged by the most exacting fiduciary standards.”⁴ General principles of trust law are frequently incorporated by courts into the federal trust responsibility. Consequently, just as private trust law is about serving the best interests of the beneficiary, “[a]t the core of the Indian trust doctrine is the federal government’s duty to serve the ‘best interests’ of the tribe and its members.”⁵ Through the trust responsibility, the federal government has a general mandate to ensure the preservation of a usable land base for future generations of tribal members.⁶ Thus, the federal government is obligated to protect Indian trust lands from alienation, confiscation, environmental degradation, or the risk of environmental degradation.⁷

It has been argued that as long as the federal agency complies with its statutory duties, it fulfills its trust responsibilities. While there are some federal decisions that make this claim, other federal decisions have left open the question of whether the United States is required to take special consideration of tribal interests when complying with applicable statutes and regulations.⁸ PIIC believes that the trust responsibility must mean more than solely complying with existing statutes and regulations. Compliance of this type is no different than what is owed to the general public. In order for the trust responsibility to have any vitality, Federal agencies must exercise a higher responsibility when taking action that may affect a tribe. This is especially true when the issues concern lands held in trust by the United States for a tribe and the tribal cultural and historic resources and a tribe’s ancestral homeland. The federal agency, here the NRC, must make every

⁴ *Seminole Nation v. United States*, 316 U.S. 286, 297 (1942).

⁵ Mary Christina Wood, “Protecting the Attributes of Native Sovereignty: A New Trust Paradigm for Federal Actions Affecting Tribal Lands and Resources,” 1995 Utah L. Rev. 109, 112 (1995).

⁶ 1995 Utah L. Rev. at 138.

⁷ *Lane v. Pueblo of Santa Rosa*, 249 U.S. 110 (1919) (enjoining the Secretary of the Interior from disposing of tribal lands under general public land laws because it would be a violation of the trust responsibility); *Cramer v. United States*, 261 U.S. 219 (1923) (placing heavy emphasis on the trust responsibility while voiding a federal land patent that had conveyed lands occupied by Indians to a railroad nearly 20 years earlier); *Pyramid Lake Paiute Tribe v. Morton*, 354 F.Supp. 252, 256 (D.D.C. 1972) (holding that the trust responsibility required enjoining diversions of water by a federal reclamation project which reduced the level of Pyramid Lake on a downstream Indian reservation and otherwise impaired the lake’s fishery). See also *Fort Mojave Indian Tribe v. United States*, 23 Cl. Ct. 417, 426 (1991) (where the trust relationship exists, the trustee “has a duty to protect the trust property against damage or destruction. He is obligated to the beneficiary to do all acts necessary for the preservation of the trust res which would be performed by a reasonably prudent man employing his own like property for purposes similar to those of the trust”).

⁸ See e.g., *Gros Ventre Tribe v. United States*, 469 F.3d 801 (9th Cir. 2006) (claiming that the trust responsibility “does not impose a duty on the government to take action beyond complying with generally applicable statutes and regulations,” while still stating that the Court was “leaving open the questions of whether the United States is required to take special consideration of tribal interests when complying with applicable statutes and regulations”).

reasonable effort to ensure that these resources are protected in order to fulfill its fiduciary duty to a tribe.⁹

The NRC Recognizes and Is Committed to a Government-to-Government Relationship with Indian Tribes.

The NRC recognizes the right of each Indian Tribe to self-governance and supports Tribal sovereignty and self-determination. The NRC recognizes Tribal governments as dependent domestic sovereign nations, independent from State governments, with separate and distinct authorities.

It should be noted that there are differences among tribes and that there is no “one size, fits all” approach when it comes to interacting with and understanding Indian tribes. Each tribe is unique and should be treated as such. There should not be a “standard process” as recommended by some commenters.

The NRC Will Conduct Outreach to Indian Tribes.

The NRC will consult and coordinate with Indian Tribes, as appropriate, related to its regulatory actions with Tribal implications and will seek additional opportunities for general outreach. The NRC will participate in national and regional Tribal conferences and summits hosted by Federal agencies and Tribal organizations, and will seek Tribal representation in NRC meetings and advisory committees concerning NRC regulatory actions that have substantial direct effects on one or more Indian Tribes.

Attending major tribal conferences and meetings is an excellent way of interacting with Indian tribes. As well, NRC staff should endeavor to attend meetings of other federal agencies that attract tribal representatives.

As we discuss below, it is important to recognize that while there might not be delineated reservation or Trust lands in a given area, that does not necessarily mean that there are no tribes interested in or impacted by NRC regulatory actions. Many tribes were forcibly removed from their ancestral lands or ceded vast tracts of land to the federal government through treaties and have retained or reserved rights (fishing, hunting, gathering) for these lands or these lands contain archaeological, cultural or historical resources, including important sacred sites.

⁹ *Fort Mojave Indian Tribe v. United States*, 23 Cl. Ct. 417, 426 (1991)(where the trust relationship exists, the trustee “has a duty to protect the trust property against damage or destruction. He is obligated to the beneficiary to do all acts necessary for the preservation of the trust res which would be performed by a reasonably prudent man employing his own like property for purposes similar to those of the trust”).

The NRC Will Engage in Timely Consultation.

The NRC will provide timely notice to, and consult with, Tribal governments on NRC's regulatory actions that have substantial direct effects on one or more Indian Tribes. Tribal officials may request that the NRC engage in government-to-government consultation with them on matters that have not been identified by the NRC to have substantial direct effects on one or more Indian Tribes. The NRC will make efforts to honor such requests, taking into consideration the nature of the activity at issue, past consultation efforts, available resources, timing issues, and other relevant factors. The NRC will establish early communications and begin consultation at the earliest permissible stage, as appropriate. The NRC will consult in good faith throughout the agency decision-making process and develop and maintain effective communication, coordination, and cooperation with Indian Tribes. The NRC representative for consultations with Tribal officials or representatives will be of an appropriate rank of NRC representatives and level of interaction commensurate with the circumstances. The appropriate level of interaction will be determined by past and current practices, continuing dialogue between NRC and Tribal governments, and program office consultation procedures.

Early and frequent consultation must be the cornerstone of the government-to-government relationship. Publishing a notice in the Federal Register is not consultation. It should be noted that sometime the consultative process can take time.

The NRC Will Coordinate with Other Federal Agencies.

When the Commission's action involves other Federal agencies, the NRC will perform its Tribal consultation jointly with other Federal agencies, as appropriate.

This will be especially important if/when shipments of spent nuclear fuel to a federal repository or an interim storage facility commence. Shipments of spent nuclear fuel will involve the NRC, the US Department of Energy (DOE) and the US Department of Transportation (DOT). Equally important is the engagement of federal agencies involved in the uranium mining regulation (i.e., the Bureau of Indian Affairs or the Bureau of Land Management).

The NRC Will Encourage Participation by State-Recognized Tribes.

The NRC recognizes the distinction between Indian Tribes who are Federally recognized and those who are not. The NRC will outreach to States to identify the appropriate State-recognized Tribes to invite to participate in its regulatory

process, including opportunities related to rulemaking, hearings, licensing, decommissioning, and enforcement.

Tribal Policy Implementation Plan

As with everything else, a policy is only as good as its implementation. The Commission directed the NRC staff to develop an implementation plan for the Tribal Policy Statement; the Implementation Plan was approved by the Commission on March 18, 2015. In addition, the NRC staff agreed to undertake the following:

1. Evaluate the existing staff guidance (i.e., Tribal Protocol Manual) to identify changes that are necessary to align with the final Tribal Policy Statement and determine if additional agency-level guidance and/or procedures will be required as described in SECY-14-0006, "Tribal Consultation Policy Statement and Protocol";
2. Implement the activities in the approved Implementation Plan;
3. Engage industry associations, Tribal governments, State governments, and other stakeholders to consider developing guidance similar to NEI 10-07, *Industry Guidelines for Effective Pre-application Interactions with Agencies Other than NRC During the Early Site Permit Process*; and
4. Work with interested Indian Tribes to develop formal agreements in anticipation of future NRC licensing activities with the objective of facilitating subsequent consultations and encouraging early Tribal participation in conducting cultural surveys to make the National Historic Preservation Act (NHPA) Section 106 process more efficient.

We believe that the key to effectively implementing the Tribal Policy Statement is via actions that will protect Indian people, lands and resources. Toward that end, an evaluation of existing staff guidance is a strong start. This evaluation should not be limited to the Tribal Protocol Manual, but all NRC staff guidance.

We recommend that the NRC evaluate guidance related to cost-benefit analyses, particularly as it relates to environmental or economic impacts on Indian lands. The NRC must bear in mind that Tribal lands (reservation, Trust) are different than lands that might be owned by a member of the public near a power plant or other NRC-regulated facility and must be analyzed differently. It is relatively easy to assign a value to fee-owned or private land because these lands are readily bought and sold. Moreover, State and county government property tax assessments are based on current real estate values, based on recent sales. Determining economic consequences to a homeowner or other property owner would be fairly straightforward. Determining economic consequences to Indian lands will not be as easy but nevertheless should be included in the analyses.

For example, most of the PIIC's lands are held in Trust for the benefit of the PIIC by the U.S. Government. Trust status means that the land is protected from state or local jurisdiction, including taxation, cannot be readily sold, and is set aside for the common benefit of the Tribe in perpetuity. Although individual tribal members may have a home on a land assignment for some period in time, the tribal member does not own the land and as such can create difficulty in assessing individually the economic impacts resulting from nuclear power plant accidents. This is an important distinction to make.

To better understand this it is important to understand the history of tribal land tenure in the United States. Past Congressional actions (i.e., the General Allotment Act or the Dawes Act, in effect from 1887 until 1934), resulted in the loss of Indian lands to non-Indians because of foreclosure due to the inability to pay property taxes on land allotted to individual Indians. During the 47 years that the Allotment Act was in effect, approximately 90,000,000 ac (36,400,000 ha) of Treaty-protected land or about two-thirds of the 1887 national tribal land base was lost. The Indian Reorganization Act (or Wheeler-Howard Act), passed by Congress in 1934, slowed the practice of assigning tribal lands to individual tribal members and reduced the loss of Indian land holdings.

Because of the difference between fee-owned and tribal land (Trust or reservation) difference, it would be difficult to place a monetary value on tribal members' homes and the value of property, in the event of an accident at the PINGP. One cannot simply re-establish an Indian Tribe elsewhere. Moreover, the tribe's enterprise, Treasure Island Resort and Casino, cannot be located anywhere except Prairie Island.

Another aspect of Indian land tenure relates to tribal culture. Tribal culture is based on traditional or aboriginal homeland of the Tribe. Prairie Island is a place of cultural and traditional significance to members of the PIIC, who are the descendants of the Mdewakanton Band of Eastern Dakota, who are also known as the Mississippi or Minnesota Sioux, who were parties to treaties with the U.S. Government from 1805 to 1863. Members of the PIIC have lived on Prairie Island for countless generations. According to archaeological evidence, Prairie Island has been a place of historical and cultural significance for thousands of years. The Mdewakanton Dakota, traditionally used Prairie Island as a summer encampment for fishing, hunting, gathering medicines and foods, and raising crops. The tribe's casino, Treasure Island, is so named because to Prairie Island tribal members, the island (Prairie Island) provided for all their needs—spiritual, cultural, traditional—and was considered to be a treasure. The traditions and culture of the Prairie Island Indian Community are related to one place, Prairie Island.

The PIIC is concerned that the traditional tools used by the NRC to analyze and quantify costs and benefits (i.e., cost-benefit models and guidance documents) cannot and do not consider the unique impacts to Indian lands and culture. Do the models evaluate the cost of relocating an intact community? The Prairie Island Indian Community would wish to be relocated as a community and not as individuals. Can the models determine the intrinsic value of an intact Indian community? Can the models determine the value of

residing on land that has significant traditional and cultural meaning? To our knowledge, there is no cost benefit model that includes a way to calculate impacts to Indian lands, people, and culture.

We suggest that the NRC work with a number of tribes, representing a cross-section of NRC regulatory activities, as well as the Bureau of Indian Affairs (BIA) to gain a better understand of Indian land tenure and the potential consequences of contamination to Indian lands.

We understand that the NRC may possibly be developing a guidance document pertaining to the National Historic Preservation Act (NHPA) Section 106 consultation. We applaud this effort. We recommend that the NRC work with tribes, the Advisory Council on Historic Preservation (ACHP), industry (limited participation), and possibly other federal agencies to develop this guidance document.

Finalizing and fully implementing the Tribal Protocol Manual will also help NRC staff to be informed on tribal issues. Training, awareness, and continuity of staff are also key elements of an effective tribal program.

Response to Other Comments

We have reviewed the comment letters submitted in 2013 by other entities on the Tribal Protocol Manual (most notably those representing the uranium mining industry) and found the comments to be self-serving, ill-informed and insensitive tribal history, culture and tradition. These commenters complained that the Section 106 process was “too cumbersome, time consuming, and costly for the uranium recovery industry” and that the pace of the consultation should be accelerated and standardized. Moreover, the commenters suggested that the NRC should not be making an exhaustive effort to identify all potentially impacted Indian tribes. In other words, hurry up and get it done!

The NRC has an obligation under the NHPA to ensure that its actions do not have adverse impacts. The NRC also has an obligation to federally recognized Indian tribes. *See, e.g., In the Matter of Northern States Power Co.* (Prairie Island Nuclear Generating Plant, Independent Spent Fuel Storage Installation), Docket No. 72-10-ISFSI-2, ASLBP No. 12-922-01-ISFSI-MLR-BD01 (April 30, 2014) (admitting contention that the NRC Staff’s EA was deficient and did not fulfill the NRC’s trust responsibility in its analysis and conclusion regarding the cumulative impacts on historic and cultural resources from the reasonably foreseeable expansion of the ISFSI). The ASLB rejected arguments similar to those advocated by these commenters:

The NRC Staff and Northern States repeat here the same argument made earlier that merely quoting PIIC’s concerns in the EA, without evaluating them, represents compliance with NEPA, and that this discharges any trust responsibility the NRC owes.... [A]t a minimum there is a genuine factual dispute as to whether such an analysis was actually conducted, and if so,

the extent to which that analysis discharges the NRC's trust responsibility to the Tribes.

Slip Op. at 31 n.144. The NRC, as a federal agency, owes a trust responsibility to tribes, independent of NEPA and other statutes, and that trust responsibility requires the NRC Staff to go beyond mere statutory compliance, and may require additional field investigations before a license is issued or renewed, or the imposition of a license condition on a licensee to ensure that any potential impacts are mitigated in order to fulfill its trust responsibilities.

As far as making an exhaustive effort to identify all potentially impacted tribes, many tribes ceded vast tracts of land to the US government or a particular tribe may no longer be in a given area because they were forcibly removed. These tribes may still have interests in the area and every effort must be made to identify ALL potentially impacted tribes.

It has been the PIIC's experience that not all historic or archaeological resources have been recorded. In fact, on Prairie Island, previously unidentified prehistoric burial mounds are "discovered" routinely, even on previously disturbed land. It is through Phase I archaeological surveys that these sites are found, many of which are eligible for listing on the National Register of Historic Places. These sites would not have been located had it not been for the consultation process. Many important prehistoric archaeological sites have been lost in Minnesota and nationwide because there was no requirement to look. If it is deemed too costly or too exhaustive, so be it.

Some commenters suggested that the NRC's uranium recovery licensing program would be best served by pursuing a regional Programmatic Agreement (PA) as a means of facilitate the National Historic Preservation Act (NHPA) Section 106 consultation process. Although a PA can be an effective way to come to agreement regarding Section 106 issues of mutual concern, however, it should be up to the tribes in the region to initiate the PA, if they feel it is in their best interests, not the mining industry.

The mining industry representatives complained that some tribes were using the Section 106 process to delay a project or have no real incentive to work with the NRC staff in an efficient manner. Astonishingly, they also suggested that a tribe should not be able to participate in the Section 106 process because they are a litigant in a current NRC administrative hearing. The PIIC has recently been involved in two NRC licensing proceedings, both as a Cooperating Agency (for NEPA) and as a litigant, and found there to be no problem whatsoever. As we discuss below, sometimes intervening in the licensing process is the only way to correct the application deficiencies.

With regard to tribes delaying the process or lacking incentive to work with the NRC, it should be noted that it can be a burden (financially and technically) to effectively participate in NRC proceedings.

Docket ID NRC-2012-2035

PIIC Comments on Tribal Protocol Manual and Tribal Policy Statement

May 31, 2015

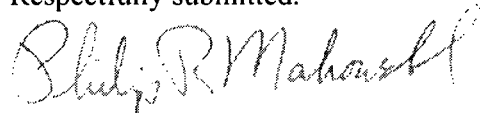
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The NEPA process (for either an EA or EIS) does not ensure that environmental issues and concerns identified by the impacted tribes will be addressed adequately, as EA's or EIS's are disclosure tools that do not and cannot offer remedies or mitigation. It is through the NRC's Atomic Safety and Licensing Board (ASLB) adjudicatory process that identified issues can be addressed (if the Board admits the affected tribe as an intervenor because the tribe has articulated a deficiency with an application before the NRC). Achieving intervenor status is a difficult and costly undertaking, given the high legal and regulatory standards to be met. Nevertheless, this is a huge barrier that many tribes cannot overcome and this should be recognized as a severe limitation to effective participation by any tribes impacted by NRC licensing actions.

In 2013, the NRC finalized its advance notification rule (10 CFR 71.97) that allows Indian tribes to receive advance notification of shipments of irradiated reactor fuel through reservation land (not Trust lands). To participate, interested tribes must "opt in" and complete safeguards training. Although the NRC was very flexible with some of the prerequisites, the fact that no tribe is currently participating in this pre-notification program should cause the NRC to pause and ask why. It could be that it is just too cumbersome for the tribes to participate, due to a lack of resources (staff, financial, etc.) or competing priorities for resources.

We thank you for the opportunity to provide comments on the draft Tribal Policy Statement and Tribal Protocol Manual.

Respectfully submitted.

A handwritten signature in cursive script, appearing to read "Philip R. Mahowald".

Philip R. Mahowald
General Counsel