



Fort McDowell Yavapai Nation

*President Ruben Balderas
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June 23, 2014

Mr. Neil J. Bosworth
Forest Supervisor
Tonto National Forest
2324 E. McDowell Road
Phoenix, AZ 85006

RE: Fort McDowell Yavapai Nation's comments, questions, and objections to Resolution Copper Mining hydrologic and geotechnical testing and monitoring activities project/Plan of Operations

Dear Bosworth:

Fort McDowell Yavapai Nation (Nation) *cannot* provide adequate or *informed* comments, ask questions, and compile a list of complete objections to Tonto National Forest (TNF) letter of May 13, 2014 regarding the Plan of Operations (POO) submitted by Resolution Copper Mining (RCM) to conduct a hydrologic and geotechnical testing and monitoring activities on Tonto National Forest (TNF). We request Scoping for this project is indeterminately withheld. Please see the justifications below.

GOVERNMENT-TO-GOVERNMENT CONSULTATION:

Before moving forward on this project, the Nation requires what the numerous laws, mandates, statutes, Executive Orders, etc. outline for meaningful Government-to-Government Consultations. Moreover, the Nation requires such Consultations be conducted at the appropriate and agreed to, by both governing bodies, level within the Forest Service (FS) on this matter.

The legal obligation of Federal Agencies to consult with Tribes on a government-to-government basis begins in the Constitution, in Article I Section 8 (the Commerce Clause), where Congress is empowered to regulate commerce with foreign governments, between the states and with the Indian Tribes. The government of the United States has an obligation to consult with Tribes as sovereign nations on matters of interest and concern to Tribes. Furthermore, Federal agencies programs and activities must be consistent with and respect Indian treaty rights and fulfill the

Federal government's legally mandated trust responsibility with Tribes. Presidential Orders and memoranda include:

Executive Order 12875 (1993) Tribal Governance- specifies that the federal government must consult with Indian Tribal governments on matters that significantly or uniquely affect Tribal government. By Executive Memorandum of April 29, 1994, the federal government must consult with federally-recognized Tribal governments prior to taking actions that will affect those Tribal governments.

Executive Order 12898 (1994) Environmental Justice- specifies that the federal Agency will consult with Tribal leaders on steps to be taken to insure that environmental justice requirements are applied to federally-recognized Tribes.

Executive Order 13084 (1998) Consultation and Coordination with Indian Tribal Governments- reaffirms the unique government-to-government relationship between Agencies and Tribes. The Order clarifies that the obligation is upon the federal government and not the Tribes to instigate and ensure that consultation occurs on a timely basis. Consultation is defined as an activity to obtain meaningful and timely input from Tribes on matters that significantly or uniquely affect Tribal communities.

Executive Order 13175 (2000) Consultation and Coordination with Indian Tribal Governments- was necessitated as Agencies had failed to develop Tribal consultation policies and the courts were slow to enfranchise Tribes. This Order firmly establishes the policy of the administrative branch of government as one that institutionalizes regular and meaningful consultation with Tribes in the development of federal policies affecting Tribes.

Executive Memorandum (2004), Government-to-Government Relationship with Tribal Governments, recognizes the unique legal and political relationship of Tribes, and reaffirms that each executive Department and Agency fully respect the rights of self-government and self-determination in their working relationships with federally-recognized Tribal governments.

Presidential Orders and Constitutional mandates are expressed in statutes and the policies of the several Federal Agencies that relate to Tribal matters. The Department of Agriculture and the Service is thereby mandated to interact with Tribes on a government-to-government basis. The Service, has defined Tribal government consultation and coordination requirements in the Forest Service Manual under section 1560 dealing with State, Tribal, County, and Local Agencies; Public and Private Organizations. Section 1563 outlines consultation procedures with American Indian and Alaska Natives. Under this section, table 1563.11 outlines Tribal Government Consultation and Coordination Requirements, documenting the authority, whom to contact, subject matter, and time frame in which to complete the necessary consultation. The aforementioned mandates that the Service must abide by include:

AIRFA - American Indian Religious Freedom Act of 1978

ARPA - Archeological Resources Protection Act of 1979, as amended and implementing regulations.

Federal Land Policy and Management Act of 1976 and implementing regulations.

NFMA - National Forest Management Act of 1976, as amended and implementing regulations.

NAGPRA - Native American Graves Protection and Repatriation Act of 1990, as amended.

NEPA - National Environmental Policy Act of 1969, as amended (and CEQ regulations at 40 CFR parts 1500-1509).

NHPA - National Historic Preservation Act of 1996, as amended.

RFRA - Religious Freedom Restoration Act of 1993.

Executive Order 13007 of 1996 – Indian Sacred Sites on federal land directs the Federal Agencies to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners, as well as to avoid adversely affecting the physical integrity of such sacred sites.

PURPOSE OF RCM'S POO AND USE OF MULTIPLE POO'S:

As we understand, the purposes of the aforementioned activities are to “collect hydrologic, geochemical and geotechnical data in order to provide baseline information on these aspects of the environment over an area being considered for a potential tailings storage site.” The TNF provided the Nation with, in our opinion, an incomplete survey conducted by archaeologists from WestLand Resources to supposedly define the boundaries of those cultural sites that occur within the proximity of any ground disturbing activities. This was the only information that was provided to the Nation in regard to the POO. The Nation is unclear why other documents were not directly provided. What we also found disturbing is that the TNF only elected to publish on their website one part of this POO containing 78 pages. Whereas, the entire POO from RCM is approximately 511 pages. Why isn't the entire POO listed under the FS website or is it posted in another area that the Nation missed? If this was a TNF error, we request that this entire document be placed for the public. Moreover, the Nation wishes to consult on the entire document not just what was contained on the 78 pages.

As the U.S. Forest Service, including TNF, are well aware the Yavapai's were and are currently stewards of the land area and including where RCM has and continues to seek mine and mine related activities – including where the proposed tailings are to be located. We are deeply concerned and frustrated that RCM's current and planned activities will cause irreparable harm to the environment including, but not limited to, contaminating scarce water supplies, decimating the land base directly through mining practices and post mining subsidence, destroying habitat for endangered species, and causing massive surface damage. Mining will also impact lands that are tied to our cultural and religious heritage as this region is part of the Yavapai ancestral territory. Dewatering, land subsidence, polluting of the land and water; all of these activities will desecrate this sacred area. I cannot express in words how deeply felt this land is to the Yavapai – it simply transcends words. Damage that will result from this mine cannot be mitigated away. With this document, the Nation also incorporates here by reference all prior statements and testimony the Nation has given to U.S Forest Service (FS) personnel, the Department of

Agriculture, Congress, administration officials, and other federal officials on RCM and those of other Tribal entities, including, but not limited to, San Carlos Apache Tribe and Inter Tribal Council of Arizona (ITCA). Overall, the Nation believes that TNF postpone any further action on RCM's POO pending Government-To-Government Consultation and based on the Nation's comments discussed herein.

ETHNOGRAPHIC STUDY:

It is apparent from the Cultural Resources Survey and other activities by RCM and TNF have undertaken or have failed to undertake that the TNF believe the Yavapai are not connected to this land and area as intimately and as strongly as other Tribes. It also appears to the Nation that TNF categorizes Tribes as having similar sacred sites, backgrounds, religious beliefs and practices, ties to the land, cultural beliefs and practice, etc. However, we are not, for a lack of a better word, under one functional Tribal belief. The Yavapai have a very distinct lineage unrelated to other Tribes such as the Apache. Traditions, cultural beliefs, and religious practices, etc. may appear to overlap to the casual observer, but upon examination, there are clearly very distinct differences. It is true that certain lands are held sacred by various Tribes, but those traditions and beliefs that are known to be carried down since time immemorial are very distinct and often distinct in origin. Yet, the TNF, on a number of occasions, has chosen not include information regarding the Yavapai – this includes actions taken under this POO. Thus, we believe and request, among other items, that an Ethnographic Study be completed in order to help minimize the gaps in information the TNF has in the understanding of the Yavapai beliefs and behaviors. We trust such a study is appropriate for studying issues and problems that the Nation has regarding this project and RCM's overall mining project. To some extent, there are no readily amenable traditional or quantitative or experimental methods alone that can explain and identify the Yavapai ties to this area. Thus, we wish to begin a dialog as to how to accomplish this process.

SCOPING

The Nation objects to this entire scoping procedure as it is premature, especially without regard to direct Consultation and the lack of knowledge the TNF has to Yavapai religious, cultural, and traditional ties to the land, sacred sites, etc. The Nation has not been consulted or questioned as to the aforementioned survey or on the next steps in RCM overall mining plan (i.e., in an all-inclusive, step-by-step Plan of Operation to mine this area). Rather, to date, the FS has taken the position to allow each separate activity that RCM performs as a single individual activity without cumulative impacts analysis (although the purpose of RCM is to **mine** and, therefore **all activities** surrounding this entire project is all under one aegis – RESOLUTION COPPER MINE). POO's are being proposed on every portion of their proposed activities, including current and proposed operations, as opposed to **ONE SINGLE POO for the entire mining operation.**

This so called POO encompass hydrologic and geotechnical testing and monitoring activities. To be clear, the Nation does not view the proposed activities as an independent or routine event. These activities are not occurring in a vacuum separate from all other activities that

RCM and others have and are planning to/proposing to undertake in and around this area. Rather, these activities are all related, cannot be segmented, and must be considered by TNF concomitantly. The Nation agrees and supports the joint comments submitted on this matter by the Arizona Mining Reform Coalition, Center for Biological Diversity, Concerned Citizens and Retired Miner Coalition, Maricopa Audubon Society, Sierra Club – Grand Canyon Chapter, Mr. John Krieg, Mr. Roger Featherstone, and others. Thus, the Nation has included these comments rather than repeat them here within our letter. However, please understand that these comments should not be taken as secondary, we have included them as an attachment for brevity – not to minimize them - and wish to consult on each of the points outlined within the letter.

Your May 13th letter states that the mining operations are allowable under currently mining laws. However, this is not truly the case. The TNF letter potentially indicates – and we strongly oppose to this line of inquiry if this is indeed the case - that they may view this proposed activity as a stand-alone project not connected with any other RCM mining actions. It appears that the review of the direct, indirect, and cumulative environmental impacts will be limited and may disregard the cumulative impacts from RCM’s other operations and other approved POO’s directly linked to this and the entire mining operations of RCM. Yet under the National Environmental Policy Act (“NEPA”), the USFS must fully review the impacts from ***all not isolated*** “past, present, and reasonably foreseeable future actions.” Thus, your review must not be limited in scope nor narrow in view of the entire project as it would not be congruent under the referenced 36 CFR Part 228 as the National Environmental Policy Act (“NEPA”) clearly demands the FS to fully analyze impacts from all RCM’s “past, present, and reasonably foreseeable future actions” for the entire mining operation.

Under 40 CFR 1508.25, scoping consists of the range of actions, alternatives, and impacts to be considered in an environmental impact statement. The scope of an individual statement may ***depend on its relationships to other statements (§§ 1502.20 and 1508.28)***. To determine the scope of environmental impact statements, agencies shall consider 3 types of actions, 3 types of alternatives, and 3 types of impacts. They include:

(a) Actions (other than unconnected single actions) which may be:

(1) Connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they:

- (i) Automatically trigger other actions which may require environmental impact statements.
- (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.
- (iii) Are interdependent parts of a larger action and depend on the larger action for their justification.

(2) Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.

(3) Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography. An agency may wish to analyze these actions in the same impact statement. It should do so when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement.

(b) Alternatives, which include:

- (1) No action alternative.
- (2) Other reasonable courses of actions.
- (3) Mitigation measures (not in the proposed action).

(c) Impacts, which may be: (1) Direct; (2) indirect; (3) cumulative.

Thus, this action could not be considered a categorically excluded activity nor can these actions under this POO be taken as a separate action for the entire mining operations of RCM.

INCORRECT ANALYSIS AND REPORTING OF THE AREA OF IMPACT:

The vague area of impact of the Project as purported by RCM and TNF state that the total area of disturbance/impact would be 92.98 ac. However, RCM's calculations do not scientifically/correctly reflect the total area of impact – the area, in fact, is much greater. Unfortunately, impact was not calculated according to and consistent with required scientific methodologies under NEPA guidance documents. For example, the calculations that are reported by RCM are only based on a very small consideration of each of the 41 “installations” and 33 geotechnical test “trenches.” In reality, to minimize their impact, RCM incorrectly stated the impact (as they report) as a partial representation of the total combined disturbance area of each of the 74 ‘sites’ (41 “installations” and 33 geotechnical test trenches equal 74 sites) that are to be analyzed. Of course, this does not include the other listed activities. Each site will have consultants, surveyors, etc. that will dig and place hydrological and non-hydrological related machinery, transmitters, piping, heavy equipment, etc. They will carry, using various modes of transport from site to site, equipment and ancillary accessories needed to both construct and monitor those 74 sites – along with a host of other causal agents including, but not limited to employing water trucks- that will cause damage to the areas resources - will disrupt surface and subsurface of soil - will disrupt cultural resources and sacred sites within what appears to be 21 sections of TNF lands (see vicinity Map, Fig. 1 RCM's POO). This entire referenced area becomes the disturbance envelop (area impacted) not each individual installation, trenches, etc.

RCM's strategy and propensity to dissect their individual POO's to give the appearance of no coordinated and cumulative activities, thereby minimize cumulative and mining activities, are clearly demonstrated within this specific project. Their total area of impact analysis does not include coordinated activity between each of the 72 sites, laydown yards, road access, equipment access, etc. For example, each geotechnical drilling and piezometer installation proposed would have a disturbance footprint of approximately 15 feet by 40 feet (0.01 acre) – again- this activity is not isolated and our scientific calculations show this area to be much greater. Thus, the entire area that they are using becomes the disturbance envelope. ***We specifically request to see RCM's calculations as to the areas of impacts and discuss this with the FS as our total area of impact calculations are orders of magnitude greater than what is reported.*** Please provide the correct impact information.

We also have questions including, but not limited to, impacts from installation of bentonite seals described under Sec. 4.2, Water Quality. These drilling practices and potential impacts of the entire drilling program to the existing groundwater aquifer system and the area must be discussed. The use of excavated pits under Sec. 4.3, Solid Wastes – how and where would they be located and how would they be reclaimed. What is their impact? What are “open settling pits at unoccupied drill sites” that are referred to throughout the document? We further have questions as to RCM's reliance on Arizona's water laws as opposed to Federal water rights and Federal laws as these activities are occurring on Federal lands.

These activities are actually scheduled for long-term use. In fact, they are of an indeterminate use which misrepresents the shorter-term nature as stated within your May 13th letter and within the POO. For example- under Sec. 5.1 Hydrologic Testing & Monitoring Well Sites it states – “For sites that would continue to be used long-term for scheduled groundwater monitoring, it may be possible to reclaim a portion of the drill site while still maintaining access to and parking at the monitoring well.” Hydrologic monitoring of wells and piezometers testing and monitoring activities as well as monitoring wells and road maintenance and drill site access for hydrological monitoring are proposed for 10 years – **yet these activities and maintenance of equipment are required for the entire time this mine and tailing site will be active – 60, 70 or more years!** Plus, this does not include the required monitoring for purposes post-mining as this will well exceed the 10 year period referenced. **Clearly, that the nature of what is being proposed is not being considered in its entirety or longevity.** Please provide the correct longevity information.

It appears that rather than scrutinizing RCM's calculations, TNF used RCM's area of impact calculations without question. Errors made by RCM and concurrence by the TNF as to the area of impact must be addressed by TNF. RCM appears to be attempting to minimize the project's impact. However, as we can demonstrate by our calculations, RCM's calculations are not only scientifically incorrect, but are meant to mislead the public. The TNF must reanalyze the area of impact using the aforementioned rational. Thus, there are so many unanswered questions as to describe what activities and their impacts – it is impossible to fully comment as there is not enough information provided by either RCM or the FS to make an informed and meaningful decision as to the impacts. The Nation requires clarification and consultation on this matter.

THE NATION REQUESTS:

- 1) As mentioned above and in previous correspondence to the FS, the Nation requests government-to-government consultation on this matter - at the appropriate local AND D.C. Federal level. We believe, in regard to RCM, TNF has demonstrated a lack of understanding and disregard of the applicable laws as well as FS policies/regulations/rules, USDA policies/regulations/rules, executive orders, and other federal policies and regulations as they apply to NEPA, Tribal entities, sacred sites, traditional and cultural properties, etc. In fact, we believe TNF has favored and has shown prejudice in favor of RCM activities regardless of requirements within the laws, FS directives and regulations, and certain executive orders, and federal policies. We wish to discuss what information the TNF and FS considers “meaningful,” how this information has and will be used to evaluate this project and all other RCM activities, who has and will further evaluate the Project (and all other activities related to RCM), qualifications of individual performing the reviews and analysis, who is/are the Responsible Official(s), and how the why the TNF has and will come to their decisions.
- 2) *In relation to the area where RCM is and is planning activities, ethnographic studies be conducted on and with Tribal entities that have ties to this area. Such studies should document and map the cultural landscapes as they are viewed by and important to Tribal entities. Such studies would assist in developing the needed protocols for dealing with Native American Graves Protection and Repatriation Act (NAGPRA) issues as well as for FS planning and decision making in this area. Developing a human ecology mapping approach to understand the Tribal connections to these lands and natural resources and understanding values, attitudes, and practices of the effected Native American communities is essential. We request a formal response as to when they will be performed or, conversely, justification as to why the TNF or FS will not perform such studies as there is countless documentation stating that this area is significant to not only the Yavapai but many Tribal entities. This was requested to TNF in previous correspondence*
- 3) The Nation takes issue with a number of items in the Cultural Resources Survey. We request to see a complete data set that went into the Cultural Resources Survey that TNF mailed to the Nation on May 13, 2014. We wish to see any and all data collected including data that was not comprised in the final report.
- 4) A written and digital color copy of the final TNF approved and accepted Cadastral Survey that RCM was required to complete and submit under the RCM Pre-feasibility Activities Plan of Operations Environmental Assessment (EA) (submitted May 2010). We understand that there were delays in processing this survey; however, the Nation assumes this survey must have been completed by now given that it was a specific requirement (prior to related RCM activities proposed or taking placed) and a

considerable length of time has elapsed since this pre-feasibility decision was filed. This was requested to TNF in previous correspondence

- 5) Typical long- and short-term hydrologic and geotechnical data gathering involve measurements recorded in or in combination of hours, days, and months; depending on the maximum period needed (longer recording result in longer periods). Thus, the Nation would like to know how the project would be specifically, step by step, conducted in the field. For example, but not limited to:

What field techniques will be employed? Will they be GPS'ed? How will specific sites be selected/criteria? How closely spaced will they be? Who will be performing these tasks?

Will there be separate data loggers/computers attached to each unit or will there be someone collecting data using one computer? Will telemetry be employed? If so, how and where will it be located and how constructed? How often and how many people will be in the field collecting this data?

What exact protocols and methods would be taken regarding cultural resources and any finds? What is specifically being done to assure integrity of sacred sites? Will there be a cultural resource specialist accompanying RCM or their subcontractors? Further information is required on cultural resource protections other than a sentence stating that there will be avoidance of these resources.

What vegetation will be affected (if the well and other sites are not pre-selected you cannot know) and what specific protections are being made for vegetation? The same questions are asked regarding wildlife.

Will the Nation be prohibited from entering into this area? If so, to what extent and for how long?

What resource surveys have been completed by TNF in the area of this project? (This is assuming that the well and other sites have been pre-selected. If sites are not pre-selected, who in TNF will be examining these sites to determine the resources and if they are viable sites?)

What TNF personnel/specialist will review this project in the field (i.e., pre- and post-project actions) to assure that impacts/damages did not occur? If impacts/damages do occur, what will TNF do to ensure that reclamation and restoration will be conducted? Who will conduct and pay for such reclamation and restoration activities?

What are the liabilities/bonding would TNF hold RCM responsible for?

What is the real and exact time-frame of this project –in total –including restoration? Are there any extensions that are built-in?

There are other questions; however, they are too many to list here.

REMEDY -SCOPING SHOULD BE WITHDRAWN UNTIL:

- 1) In order to assure accuracy, the Nation, under government-to-government consultation, requests to discuss the aforementioned area of impact/disturbance envelope and calculations prior to re-analysis.
- 2) Ethnographic surveys be conducted.
- 3) Answers to the Nation's questions are satisfied.
- 4) All scoping documents using this erroneous 92.98 ac area of impact must be republished/reissued with the correct information so that the Public has an accurate understanding of the Project and comprehension of the resulting impacts.

IN CONCLUSION, over the last several years, the FS has taken a position regarding RCM - repeatedly stating the requirement for RCM to follow and comply with a FULL NEPA review. This position has been reiterated in testimony by FS officials in different House and Senate hearings on various versions of legislation concerning RCM. The Nation has met with Forest Service and Department of Agriculture officials in DC and they had promised that this project, as a whole, would comply with NEPA. In fact, the requirement for NEPA and the requirement to examine how RCM will affect Native American cultural, religious, and sacred sites for the entire RCM operation is clear to the FS at the National level. Current and past FS Associate Chiefs have testified before Congress on this matter. For example, FS Associate Chief Mary Wagner before the U.S. House Subcommittee on National Parks, Forests and Public Lands Natural Resources Committee on June 14, 2011 Concerning H.R. 1904: the Southeast Arizona Land Exchange and Conservation Act of 2011, stated that the FS had a principal concern regarding RCM and NEPA mining exploration activities under an area that is sacred should not continue "without a review or study." Associate Chief Wagner continued her testimony making additional statements as to the sacred and religious nature of this area to Native Americans. Ms. Wagner clearly articulated that:

"it is important to more fully understand the scope of the project before proceeding and address potentially significant environmental concerns and sites of high importance to local Tribes."

As stated in our numerous testimonies before Congress on legislation pertaining to RCM, since time immemorial, the Yavapai (and other Indian Tribes) have exercised our religious rights, traditions, cultural practices, and teachings in this area. TNF and the FS was made aware that since time immemorial the Yavapai and Fort McDowell Yavapai *still continue* to use many plant species in the area for cultural and religious purposes. Thus, there needs to be corroboration of resource facts between the Nation and FS. A better understanding and clarification is requested.

Although this land is now in federal ownership, it can still be visited, touched, and cherished. The spirits remain and we still feel their presence. We have repeatedly noted that RCM operation will cause irreparable damage to the environment of this area whose resources are inextricably linked to sacred sites, archeological, and the cultural and religious heritage of the Yavapai People. Thus, requesting that Scoping be indeterminately withdrawn until Consultation and an Ethnographic survey be completed is warranted.

The Nation has discussed and is on record regarding sacred sites of this area. The very integrity of these sites (as well as cultural resources) will be unavoidably damaged given the breath and actual longevity of this project POO. The Nation has a great concern and opposes how the FS can evaluate the project independently from all other actions that RCM is undertaking and will undertake along with their resulting direct and indirect impacts. As detailed above, the disturbance/impact envelope is much greater area that the area RCM and TNF is reporting. *In fact, as we mathematically calculated and wish to further demonstrate, just on the direct area of impact of this Project – not including buffer zones- is orders of magnitude greater than the 92.78 acres calculated by RCM.* The Nation has discussed and testified to some of those overall impacts as has other Indian Tribes such as the San Carlos Apache's, the Zuni's, the 20 member Inter Tribal Council of Arizona, and a host of other groups and individuals. In these documents and discussions, the Nation stressed impacts and environmental and cultural damages of RCM. Untenable security and sustainability of the ecosystem including effects on groundwater, surface water, land disturbance, pollution, and subsidence issues, and incalculable cultural losses caused by RCM will destroy land and an area that is critically important ancestral territory that the Yavapai People ***still hold and use today*** - this is a very sacred, religious, and culturally significant place.

We look forward to hearing from you. Please submit any and all correspondence, questions, comments, answers to aforementioned questions, guidance documents, studies, arrangement for consultations, etc. to Dr. Carole Klopatek, Government Relations Director for Fort McDowell Yavapai Nation with a copy submitted to me. Dr. Klopatek is the lead on this issue and can be reached at cklopatek@ftmcdowell.org.

Respectfully,



Ruben Balderas, President

cc: Fort McDowell Yavapai Nation Tribal Council
Mr. Philip Dorchester, GM, FMYN
Dr. Carole Klopatek, Government Relations Director, FMYN
Mr. Thomas Moriarty, Acting GC, FMYN
Ms. Karen Ray, Cultural Resources Manager, FMYN