

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Subject: comment for 16 1871 EL BGN
Date: Thursday, January 7, 2021 5:06:35 PM
Attachments: [image001.png](#)

From: Sherri Lange <kodaisl@rogers.com>
Sent: Thursday, January 7, 2021 5:04 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Subject: Please add to Icebreaker 16 1871 EL BGN

Good afternoon, Mr. Butler

Here is an overview, not complete with respect to aspirational projects, but up to date with offshore US wind efforts so far. This includes LEEDCo/Icebreaker.

Icebreaker, Cape Wind, Block Island, Vineyard Wind. **All, environmental disasters**, one in the making but in legal limbo, the others proposed and withdrawn , and one in hiatus due to technical problems.

Icebreaker: Case 16 1871 EL BGN, if you could kindly file.

We call the efforts by cavalier shoddy developers, ominous and "dangerously planned," really. Incomprehensible because they only exist on subsidies, as we know.

As Part One shows, the Icebreaker touted Mono Bucket design, has been discounted now by Fred Olsen Renewables. We wonder what is the new design, and would this constitute the need for a new application.

Thank you.

TORONTO, March 17, 2020 (GLOBE NEWSWIRE) — Northland Power Inc. (“Northland”) (TSX: NPI) today is providing an update regarding the installation of the two turbines utilizing mono bucket foundations (“Demonstrator Project”) at its Deutsche Bucht offshore wind project. As announced on February 25, 2020, the installation of the Demonstrator Project was paused in the fourth quarter of 2019 **following the identification of technical issues....Northland has elected to permanently forego the installation of the Demonstrator Project.**

Please see below:

Sincerely,

Sherri

[U.S. Offshore Wind Projects: Eco-Consequences on the Firing Line \(Part I: Icebreaker, Cape Wind, Block Island\) - Master Resource](#)

U.S. Offshore Wind Projects: Eco-Consequences on the Firing Line (Part I...

A proposed six-turbine project eight miles offshore, Icebreaker (Ohio) has been in the cooker for a decade or mor...

U.S. Offshore Wind Projects: Eco-Consequences on the Firing Line (Part I: Icebreaker, Cape Wind, Block Island)

By Sherri Lange -- January 6, 2021

*A proposed six-turbine project eight miles offshore, **Icebreaker** (Ohio) has been in the cooker for a decade or more.... The consensus is that even with the “poison pill” feathering requirement removed, Icebreaker faces enormous obstacles and crippling delays.*

*Going back to 2001, the **Cape Wind** (Massachusetts) project planned to*

erect 130 turbines in Nantucket Sound. The opposition was relentless, and eventually, “no turbines were ever anchored to the ocean floor, no blades ever spun, no power was ever generated.”

*It won permits and was constructed, but the \$300 million **Block Island, RI** project has been a monument to planning failures. Transmission cables, improperly trenched and insufficiently buried, are floating dangerously, requiring a shut down of the turbines to facilitate costly repairs.*

Wind turbines are the ultimate in environmental consequence, wasting and contaminating land, water, and vistas, as well as harming wildlife and people. And all for nothing, wind energy is at once too expensive and unneeded.

Eco-harms? Ask the real environmentalists who live in the country only to find their pristine lives compromised by some of the biggest machines in the world.

Having plundered large areas of pristine forests, mountain tops, and farm land, the foreign multinationals have now arrived at coastal areas, arranging permits for shore substation and cable transmission insertions.

This string of effort stretches from Maine to Virginia. Even the Bureau of Ocean Energy Management (BOEM) admitted it had not anticipated the rush, and some of the consequences. “We are in an incredible growth period,” [adds](#) the American Wind Energy Association, which see as much as a \$70 billion offshore wind ‘pipeline’ by 2030.

Icebreaker (Lake Erie, offshore Cleveland)

A proposed six-turbine project eight miles offshore, Icebreaker has been in the cooker for a decade or more. [1] In 2014, the Ohio Power Siting Board (OPSB) chair Todd Snitchler informed then-developer LEEDCo that the project was deeply flawed. Enter foreign billionaire, Fred Olsen Renewables Inc, Norway. With a new case number, new design, new application, the project was finally approved by the OPSB to the dismay and objection of many groups.

[Two lawsuits are pending.](#) and many questions remain as to whether the project [can survive the numerous delays and hurdles.](#) such as the mandate to [produce mitigation processes for endangered and other wildlife.](#) directly in the path of the six massive turbines. (The Staff at OPSB conditioned the permit with 33 caveats, some are onerous and, in our view, Project Killers. Even with the [“feathering” restriction finally removed.](#) remaining conditions are viewed as bulky, lengthy, and if one examines it carefully, some impossible.)

Developer has now reneged on the MONO BUCKET design, and even the design now is up in the air. Question: is this not now a completely new application?

Pushback against the project remains formidable. Several effective groups, both sides of the border, have resisted and delayed or otherwise intercepted all turbine efforts offshore: GLOW, Great Lakes Offshore Wind NYS, defeated. Toronto Hydro Energy Services' plan for 400 massive machines in Lake Ontario, Canada, and other developer plans for hundreds, thousands more, quashed with an offshore moratorium

(2011).

LEEDCo/Icebreaker, permitted after an eleven year battle, has massive hurdles and two lawsuits to surmount. Likely delay and obstacles put before them by the OPSB staff is likely to defeat this would-be Great Lakes despoiler, Fred Olsen Renewables Inc. Norway.

(Meanwhile, another Great Lakes wind project by Diamond Wind, for 50 turbines, is likely to be terminated with the sheer force of activists and Great Lakes protectors such as Residents Sharen Trembath and Paul Michaeliec, as well as New York State Senator George Borrello and Representative Chris Jacobs, to name a few.)

The number of active groups that continue to work to arrest the LEEDCo Icebreaker proposal are wide and deep. Great Lakes Wind Truth active for 11 years; Lake Erie Foundation, Save Lake Erie, Save Our Beautiful Lake Cleveland, Lake Erie Marine Trades Association, Michigan Boating Industries Association, are very active groups. Additional groups have registered their objections.

- Citizens Against Wind Turbines in Lake Erie (OH and NYS),
- Partnership for the Preservation of the Down East Lakes Watershed,
- Protect Our Lakes (Rich Davenport),
- Erie County Federation of Sportsmen's Clubs, Co-ordinator Len DeFranciso,
- Ripely Hawk Watch,
- Whitely County Concerned Citizens,
- Laurel Mountain Preservation Association,
- Port Crescent Hawk Watch,
- Wells County Concerned Citizens,
- Ontario Regional Wind Turbine Working Group,
- Preserve the Wellfleet, Green Acres Sportsman's Club,
- Save Our Allegheny Ridges,

- Whitely Council of Concerned Citizens,
- Mayor of Cavan Monaghan (Ontario),
- Interstate Informed Citizens Coalition, Manvers Wind Concerns,
- Auglaise Neighbors United,
- Ohioans for Affordable Electricity,
- Friends of Arran Lake,
- Concerned Citizens of DeKalb County,
- Alliance for Wise Energy Decisions,
- Inter-Lake Yachting Association (6,000 members),
- Save the Eagles International,
- No Lake Erie Wind Farm,
- Save Our Skyline Ohio,
- Toronto Wind Action,
- World Council for Nature,
- Friends Against Wind (France).

More international individuals and groups have logged objections ([partial list here](#)).

Over a decade, the developer has received \$13.7 million (much of it [DOE-funded](#)) with the prospect of [\\$126 million to come](#). A staggering amount for a government-enabled project that is undesired by the locals. We have heard the propaganda: jobs, manufacturing chains, cleaner air, no environmental harm ... saving the earth one turbine at a time ... reducing CO2 and getting off the fossil fuel addiction. None of these claims are true or useful.

[Among the proposal conditions that remain:](#) (Paraphrase of partial list of to do's) Icebreaker must

- File a separate report on transmission lines;
- Conduct a preconstruction conference with all the contractors; must assure compliance with all federal and state regulations;
- Must provide detailed engineering drawings [*At this point the developer wishes to change the design of the turbine from mono bucket to an unknown design, which suggests to us the requirement of a completely*

new application]; must finalize coordination with the appropriate federal agency (U.S. Department of Energy) in consultation with the Ohio Historic Preservation Office with regards to completing Section 106 of the National Historic Preservation Act of 1966;

- the Applicant shall comply with all terms in the Avian and Bat memorandum of understanding (“MOU”) and the Fisheries and Aquatic Resources MOU between the Applicant and the Ohio Department of Natural Resources (“ODNR”), as well as the monitoring plans attached to the MOUs, and any other protocols or documents resulting from these MOUs.
- Prior to the commencement of construction, the monitoring plans will be finalized and accepted through written communication from the ODNR. The monitoring plans are living documents and any modifications to the MOUs or resulting documents will be finalized and accepted through written communication from the ODNR and shall be filed in the case docket upon completion; 120 days prior to commencement of construction, the Applicant shall submit a fisheries and aquatic resources construction monitoring plan to the ODNR and Staff for review to confirm compliance with this condition.
- Prior to the commencement of construction, the monitoring plan must be finalized and accepted through written communications from the ODNR. The Applicant’s plan shall be consistent with the ODNR approved Fisheries and Aquatic Resources MOU and monitoring plans attached to the MOU, and any other protocols or documents resulting from the MOU.
- The monitoring start date and reporting deadlines will be provided in the ODNR acceptance letter and the Staff concurrence letter. At least 120 days prior to commencement of construction, the Applicant shall submit an avian and bat impact mitigation plan to the ODNR and Staff for review to confirm compliance with this condition that implementation of the plans would be effective in avoiding significant impacts to avian and bat species.
- The avian and bat impact mitigation plan shall incorporate the most current survey results, the post-construction avian and bat monitoring plan, and all measures that have been adopted to avoid and minimize potential adverse impacts to birds and bats.
- The plan shall also include a collision monitoring plan, which will include a description of the collision detection technology selected by the Applicant in consultation with the ODNR and Staff, the results of lab and field testing of the collision detection technology, and adaptive

management strategies.

- The collision detection technology shall be installed and fully functioning at the time the turbines commence operation and shall continue to function in accordance with the collision monitoring plan. Operation of the collision detection technology is subject to audits by ODNR or its third-party consultant.
- Prior to the commencement of construction, the impact mitigation plan must be finalized and accepted through written communications from the ODNR. The Applicant shall also provide the impact mitigation plan to, and seek consultation with, the U.S. Fish and Wildlife Service (“USFWS”).
- The Applicant shall update the impact mitigation plan as new information is attained through surveys. Any proposed modifications to the impact mitigation plan shall be submitted to the ODNR and Staff for review to confirm compliance with this condition and shall be finalized and accepted through written communications from the ODNR.
- The impact mitigation plan (including the collision monitoring plan) shall survive the MOU and shall remain in place for the life of the project.
(Partial list)

It is hard to imagine what kind of collision detection technology could be utilized. It is hard to imagine a viable monitoring plan for a proposal that without doubt will harm and kill species, some endangered.

The consensus is that even with the “poison pill” feathering requirement removed, Icebreaker faces enormous obstacles and crippling delays.

It is most likely that the two lawsuits, prevailing logic, and ongoing public objections, will terminate this proposal.

Cape Wind (withdrawn)

Going back to 2001, the Cape Wind project planned to erect 130 turbines in Nantucket Sound. This was within view of Cape Cod, Nantucket, and Martha’s Vineyard. Legal and financial setbacks ultimately tanked

this project in 2017, not the least of which were successful objections that came from wealthy coastal community members.

Jim Gordon, a green energy entrepreneur, put \$100 million of his own money into the adventure, which was eventually swept away.

The [opposition was relentless, and eventually](#), “no turbines were ever anchored to the ocean floor, no blades ever spun, no power was ever generated.”

Ian Bowles, then state secretary of energy and environmental affairs under former Gov Deval Patrick, who supported Cape Wind, along with other environmental groups, said: [“The project unfortunately demonstrated](#) that well-funded opposition groups can effectively use the American court system to stop even a project with no material adverse environmental impacts....”

Even the proponent with deep pockets was surprised at the cost of promoting this project, the amount of money needed to sustain the idea, and the power of the opposition. ([Mr. Gordon missed a construction deadline](#), and two local utilities cancelled contracts. He was ultimately denied permission to build the transmission line. This was death by a thousand cuts.)

(Note: the argument that offshore or onshore, have “no material adverse environmental impacts,” is typical lingo and should be completely discounted as disingenuous and pure propaganda value only.)

Block Island (Rhode Island): First Operational US Offshore Project

It won permits and was constructed, but the \$300 million Block Island,

RI project has been a monument to planning failures. Transmission cables, improperly trenched and insufficiently buried, are floating dangerously, requiring a shut down of the turbines to facilitate costly repairs.

It is difficult to say when these cables will be technically correct and functional. (Cables were placed with jet plow rather than the-suggested directional drilling.)

The cabling caper is expected to cost as much as a \$100 million—another aspect of a hardly “green” endeavor. [“Grover Fugate, director of Rhode Island’s Coastal Resources Management Council,](#) said up to half a mile (800 metres) of cabling will have to have new sections spliced in and be reburied in the approach to Crescent Beach, with two cables affected – one running from Block Island and owned by Orsted and a second export line owned by power off taker National Grid.”

Watch for more cable issues, community pushback, and technical disasters. There seems to be no concerted plan for mapping cables offshore, leaving spaghetti-like incoherent and unmanageable underwater and land cabling connection issues ([AC and some hoped for DC](#)), each with its own electrical and pollution challenges.

Clearly, proper engineering protocols were not followed. Is this cutting corners, incompetence, or both? Will this pattern of hasty dangerous shortcuts continue along the Eastern Seaboard? See [Part Two tomorrow on the dismal prognosis for U.S. offshore wind re Vineyard Wind, Nantucket](#)

U.S. Offshore Wind Projects: Eco-Consequences on the Firing Line (Part I...

"Vineyard Wind has withdrawn its construction and operation plans from the federal permitting process, suddenly ...

[1] [Master Resource](#) posts have tracked the long history of LEEDCo:

<https://www.masterresource.org/offshore/vineyard-wind-ii/>

U.S. Offshore Wind Projects: Eco-Consequences on the Firing Line (Part II: Vineyard Wind)

By Sherri Lange -- January 7, 2021

"Vineyard Wind has withdrawn its construction and operation plans from the federal permitting process, suddenly throwing the future into limbo for the international consortium that has been at the front of the pack in the race to build offshore wind farms off the American eastern seaboard."

– Noah Asimow | [The Vineyard Gazette](#), December 14, 2020.

[Part I yesterday](#) reviewed the history and current status on three (of four) U.S. offshore wind projects: one proposed, one defunct, and one (barely) operational. They are:

- **Icebreaker** (Ohio), a proposed six-turbine project eight miles offshore, that is currently dealing with significant and perhaps fatal environmental permitting requirements.
- **Block Island** (Rhode Island), which has encountered significant operational problems, producing very low output and adding new costs.
- **Cape Wind** (Massachusetts), a defunct proposal to erect 130 turbines in Nantucket Sound.

Part II today reviews the status of the proposed \$2.8 billion [Vineyard Wind](#) project in federal waters off the shore of Bedford, Massachusetts.

Background

[Vineyard Wind](#) (Copenhagen Infrastructure Partners and Avangrid Renewables) proposes to build 100 or more wind turbines totaling 800 megawatts in federal waters 15 miles south of Martha's Vineyard. Three years in the making, the project aims to serve approximately [400,000 homes](#).

In August 2019, the Department of the Interior's Bureau of Ocean Energy Management (BOEM) pushed the **stop** button, requesting more information on the "cumulative impacts" for offshore wind turbine projects in the area.

And then just before Christmas 2020 came the news: *Vineyard Wind withdrew its Federal Permitting Review*. Here is how a local paper [described](#) it:

The process had seen repeated delays and slowdowns, but had nearly reached the finish line late last month, with the Bureau of Ocean Energy Management (BOEM) expected to release a final environmental impact statement by Jan. 15, five days before President Trump leaves office.

Now Vineyard Wind appears to be betting on the Biden administration for a fresh start.

“While the decision to pause the ongoing process was difficult, taking this step now avoids potentially more federal delays and we are convinced it will provide the shortest overall timeline for delivering the project as planned,” said Vineyard Wind CEO Lars Pedersen in a followup statement Monday. “We intend to restart the BOEM process from where we left off as soon as we complete the final review.”

On Monday, a spokesman for BOEM confirmed in an email to the Gazette that the agency had received a letter from Vineyard Wind withdrawing its proposal, effectively halting the project’s years-long review process and leaving the overall status of the development unclear.

“BOEM is not actively reviewing Vineyard Wind’s application right now,” the statement said. “Vineyard Wind is welcome to submit a new construction and operations plan, at which time BOEM will begin an appropriate environmental and technical review.”

The spokesman did not clarify whether the agency intended to entirely restart the project’s permitting if or when Vineyard Wind submits a new project plan – which could lead to years-long delays.

Pause, Restart, or Termination?

The new strategy seems to be a Biden Administration rescue. But be careful: serious environmental issues remain that will inflame a lot of locals—and environmentalists too. A [statement](#) from BOEM (Department of the Interior, December 16, 2020) indicates deep problems:

“Vineyard Wind LLC’s Proposed Wind Energy Facility Offshore Massachusetts

AGENCY: Bureau of Ocean Energy Management.

ACTION: Notice.

SUMMARY: The preparation of an Environment Impact Statement (EIS) for the Construction and Operations Plan (COP) submitted by Vineyard Wind LLC (Vineyard Wind) concerning the construction and operation of an 800 megawatt wind energy facility offshore Massachusetts (Vineyard Wind 1 Project) is no longer necessary and the process is hereby terminated.

DATES: This termination takes effect immediately.”

[On June 12, 2020, BOEM](#) published a Supplement to the Draft EIS (Environmental Impact Study) as comments from the public and stakeholders, requesting an expanded analysis of fishing data, previously unavailable to BOEM, necessitated a further EIS to be published in the Federal Register by December 11, 2020. December 1st, Vineyard Wind, perhaps to avoid further scrutiny, withdrew effective “immediately.” It remains to be seen how the new design for the GE Haliade-X turbine, will somehow miraculously reinvigorate the COP (Construction and Operations Plan) ...and kickstart reapplication.

The wording of the Statement by BOEM appears conclusive and definitive.


Commentary

Reflecting on the failure of Vineyard Wind, activist Marie Stamos writes:

I passionately believe that any relinquishing of absolute clarity as to the unworthiness of industrial wind to power our planet will only give purchase to those who will sell us down the river to the economic and environmental destruction to be wreaked by unchecked greed, grievously empowered by the truly uninformed.

Writer and activist Barbara Durkin reminds colleagues in a December email: the jobs will not be U.S. based, and profits will be absconded with this grim reminder.

- Contract for transport and installation of 84 turbine foundations, monopiles ([Heerema Marine Contractors](#)), is Dutch.
- [Prysmian Group \(Italy\)](#) has created an agreement with Vineyard Wind valued at 200 million euros, to design, “manufacture, install and commission the submarine cabling system that will connect the offshore wind farm with the continental US power transmission grid. The project will require a total of 134 kilometres of high voltage alternating current electric cable.” To create jobs in Italy and China with U.S. taxpayers’ dollars.” (quoted from an email from Ms Durkin)



Prysmian secures approx. €200 million offshore wind energy project in th...

Prysmian secures approx. €200 million offshore wind energy project in the US

- - Iberdrola is Avangrid, Vineyard Wind partner, that has created green jobs in Spain with U.S. taxpayer's funding.
 - [“The biggest winner \(for offshore coastal wind leases\) was Spain’s Iberdrola](#), the world’s biggest renewable-energy utility. Iberdrola snapped up grants worth \$294 million for five wind “farms.”



- [Vineyard Wind will likely create cable manufacturing jobs in China.](#) [“Luigi Migliorini](#), CEO of **Prysmian Group China**, added that “Prysmian Group can now offer a wide range of cable technologies and products, including Extra High Voltage and High Voltage cable systems, as well as Medium Voltage and Fire Resistant cables, from 6kV to 500kV. The new plant will be capable of producing all the main designs available in the HV systems sector”.
- Quote from Barbara Durkin, in an email: “Citizens deserve better than the forced sacrifice of our ocean resource; and our tax dollars being committed to foreign countries to create foreign jobs.” Please see: [Offshore Vineyard Wind is Un-American.](#)

The Fishermen’s Meeting, Edgarton

Filmed by Activist Helen Parker, [The Fishermen’s Meeting outlined regulatory capture](#), critical harm to be caused by improper placing of turbines, gross misrepresentation of the benefits of the project, a

watering down of impacts by “industry consultants,” and a complex and eloquent array of objections that in my mind, could never be overcome.

Combined with the hundreds if not thousands of pages of letters to BOEM, DOE, documents on fishing, impacts to squid, and possible dangers to fishermen who may require rescue near turbines, as well as navigational obstructions, and dangers, it is as eloquent and clear view of offshore impacts to fishing and fishermen as one could hope for.

Excerpts from Radio Broadcaster, [All Things Considered](#) in ‘How Offshore Wind Industry May Affect Fishing Industry,’ a three-minute listen, is illustrative:

[DAVID BERNHARDT](#): In the West, we do wind, all right? You know where we don't put a windmill? You know where we don't put one? – in the middle of a highway.

EVANS-BROWN: He's saying there's too much fishing boat traffic in this area. The fishing industry wants 4-mile-wide transit lanes through the wind farms. But seven wind farm developers have jointly agreed to lay out all of their projects with one mile in between each turbine in every direction. The CEO of Vineyard Wind, Lars Pedersen, says a Coast Guard study backed their proposal.

LARS PEDERSEN: The grid-like layout would create in itself 200 transit lanes through the area. And if you started implementing dedicated transit lanes, that would create a funneling effect that would increase density of fishing vessels in smaller areas and actually increase the risk of

collision.

EVANS-BROWN: The fishing industry has demanded a correction of that study, saying it used a bad data source for navigational data. They still see the wind industry as an existential threat. There is a fishing industry that is already living with offshore wind – in Europe. Andrew Gill of Cranfield University says European turbines are much closer together. And while some boats are allowed to fish in between them, not many do.

ANDREW GILL: There's been a reticence to do it, which is really down to uncertainty and lack of knowledge of sort of, you know, is it safe to go in there? What's on the books on the seabed under there? How am I going to lose my gear? What happens if I collide with a turbine? Whose fault is it?

[Bonnie Brady \(Executive Director of the Long Island Commercial Fishing Association,\]](#) says placing wind turbines in the middle of “traditional, historically productive fishing grounds” is a “recipe for disaster.” It is crucial to note the scope of the proposed developments near Nantucket and beyond. BOEM (Bureau of Ocean Energy Management) [“now has 15 active wind leases,](#) for nearly two million acres.”

CONCLUSION

There is no doubt that international contractors are plundering the USA taxpayers through subsidies, grants, loan guarantees, and tax preferment. It is only logical that these incongruous offshore mega wind

projects face an uphill and deeply contentious battle.

Don't be sidetracked with developers' claims, replete with incorrect, misleading environmental packages and assertions about CO2, climate, and jobs, activists continue to push facts aggressively and intelligently over fantasy. True environmental protection must win over subsidy gouging and eco-predation.

It will be an ongoing battle, but it is obvious that the present and future road for offshore international developers in the US is increasingly troubled. Activists are apparently not hindered by the "weight of time" in their protection of natural resources, wildlife, fishing, and historic seaside/lakeside communities. (The Icebreaker/LEEDCo fight is well into 11 years, Vineyard Wind, adding to Cape Wind, over 20 years.)

Appendix: Bad Offshore Economics

[Offshore wind costs roughly double of land](#) based turbines, maintenance costs are staggering, older fleets suffer the impacts of salt and natural weather impacts, cable problems continue to plague the industry, and there are ubiquitous lawsuits from disgruntled residents of many countries. So much for the glamor.

[Paul Driessen and Mark Duchamp](#) in Master Resource additionally explored the harm of offshore wind: (Whales, An Offshore Wind Issue)

Whales: An Offshore Wind Issue - Master Resource

"Granted, the acoustic pollution caused by sonar – particularly powerful navy systems – is greater than that fro...

Between January 9 and February 4, 2016, twenty-nine sperm whales got stranded and died on English, German and Dutch beaches.

Environmentalists and the news media have offered all manner of explanations – except the most obvious and likely one: Offshore wind farms. Indeed, the area has Europe's and the world's biggest concentration of offshore wind turbines, and there is ample evidence that they can interfere with whale communication and navigation.

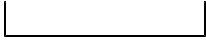
The harm to wildlife from industrial wind everywhere is documented, but unfathomable in scope. Now the inevitable disruption to historic and life-giving fishing grounds also cannot be tallied. Are we willing yet with offshore turbines to risk even more carnage to ocean creatures and human sustenance, oceans of majesty and mystery, a universe of life uniquely complex, and supremely in danger, again? And again?

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Summary: Public Comment Public Comment of Sherri Lange via website electronically filed by
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