

August 10, 2026

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Hon. Nicholas Planty
Hon. Erika Bergen
Hon. Anthony Belsito
Administrative Law Judges
Office of Hearings and Alternative Dispute Resolution
New York State Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 24-T-0446 – Petition of New York Transco LLC and New York Power Authority for a Certificate of Environmental Compatibility and Public Need – Regarding the EM&CP Phase 2 Preliminary Initial Comments

Dear Secretary Phillips and Your Honors:

On July 21, 2026, Your Honors were asked to provide clarification and relief regarding EM&CP Phase 1 and Phase 2. Specifically, you were asked to address whether the Applicant's stipulated comment periods are valid, particularly in light of inconsistent statements made by DPS concerning the EM&CP comment periods. To date, we have not received a response from the Commission. Accordingly, we again respectfully request clarification, the establishment of clear deadlines by the Commission, and clarification of DPS Staff's statements.

Once again, in the absence of a complete Joint Proposal, we are compelled to submit preliminary comments on an expedited basis, based solely on what we have been able to reasonably review of the voluminous, yet incomplete Phase 2 technical filings within an extremely condensed timeframe. As such, we do not waive the right to submit further substantive comments on Phase 2 or any other phase. Nor do we concede that the EM&CP filings to date are complete, ready for review, or procedurally proper while substantive issues pertaining to the proposed Joint Proposal remain unresolved. This request is made without waiving, narrowing, or replacing any substantive or procedural objections, and without limiting our rights to submit additional comments regarding the EM&CP filings. In addition, the comments made herein address points raised in the Phase 2 filing and do not reopen, supersede, or replace any submissions related to the proposed Joint Proposal. If the proposed Joint Proposal or its Certificate Conditions are discussed herein, it is only because they are referenced in the Phase 2 filing, because Phase 2 relies upon statements made in the proposed Joint Proposal, or because the Phase 2 filing addresses issues that were deferred from the proposed Joint Proposal to the EM&CP. Accordingly, we preserve and do not waive any pending procedural filings, or any rights arising from any future Certificate conditions, Certificate agency decision, protected filing, or any future material changes related to the proposed Joint Proposal or past, current, or future provisional EM&CP filings.

EM&CP Phase 2 Comments

EM&CP Phase 2 is plainly a rushed filing by the Applicant in an effort to advance this project and does not provide a comprehensive plan. Once again, the Applicant fails to provide parties and stakeholders with sufficiently detailed, comprehensive information on which reasoned decisions can be made, particularly given that the proposed Joint Proposal and its Certificate Conditions have not yet been approved and remain subject to change based on parties' procedural filings, Federal Agency permits, and the Commission's overall review. Instead, the Applicant provides the following in EM&CP Phase 2:

- **Outstanding Federal agency approvals**, where there are noted clearance issues and significant differences in desired burial depths reflected in Applicant's provided one-sided agency correspondence. The Applicant references plans and discussions but does not provide the detailed plans or complete first-hand accounts of issues raised by the agencies.
- **Further deferral of land-rights determinations to later phases**, despite this being a well-known and repeatedly documented issue, as reflected in the Village of Sea Cliff's July 21, 2026 "Notice of Threshold Deficiency and

Request for Interim Relief Regarding Phase 2 EM&CP Unresolved Underwater Property Rights, Sections I–IV and Exhibits A–H,” the Iroquois filing dated July 17, 2026, and the Gladsky Marine submission.

- **Plans labeled “For EM&CP2 Submittal Only” and “Not for Construction” or “For Illustration Purposes Only,”** including, for example, Appendices P, AE, and X.
- **Unknown burial depths if targets are not achieved after two attempts.**
- **Unknown alignments and equipment arrangements.**
- **“To be determined” utility co-location issues and planned outages,** with no clear plans to address impacts to the public or expected outage periods.
- **Lack of protections for Sole Source Aquifers**
- **Deferral of key aspects** of the project to later phases.
- **Incomplete assessments of cumulative impacts since** Phase 2 impacts are not independent of Phases 1, 3, 4 and 5 for the Shore Road Location.
- **Special carve-outs for New York City** that are not applied to other areas along the route.

This is inadequate for a project of this size and complexity demonstrating that, in the Applicant’s rush to advance the project, it has not fully determined how it intends to proceed. We now have a proposed Joint Proposal that defers key planning aspects and details to an EM&CP, and two EM&CPs that in turn defer key aspects to future dates, determinations, and filings. Given the scope and magnitude of this project and its substantial environmental and community impacts, it should not proceed on this “plan of deferring to a future plan” and “build as you go” basis. The record lacks sufficient detail for any party to make informed decisions regarding the actual scope of work or its implications and instead offers only “best efforts” and determinations to be made at a later date or at the time of actual construction.

Moreover, while the Applicant appears to have carefully provided for substantive protective measures to facilitate what it seeks to do, it has failed to propose adequate environmental protections for residents, businesses, schools, Hempstead Harbor or Long Island Sound.

A. Complaint Resolution - Noise Resolution and Lighting

The reliance of EM&CP Phase 2 on the complaint resolution process established in EM&CP Phase 1, Appendix N, is not meaningful for residents of the impacted community and is wholly inadequate for a project of this size, scope, and complexity. The staffed hours of operation for the complaint hotline, as well as the availability of the environmental manager, should correspond directly with the project's construction schedule. A sufficient number of environmental managers should be available to respond to complaints in real time throughout the project area, with prompt investigation, documentation, and implementation of appropriate mitigation measures at the affected locations.

Instead, community stakeholders are provided with a staffed hotline that operates only Monday through Friday, from 9:00 a.m. to 5:00 p.m., despite the fact that within Appendix M of EM&CP Phase 2 the Applicant plans to conduct construction activities 24 hours per day 7 days a week. There is also no on-site mechanism to address complaints in real time, instead, construction personnel provide residents with a flyer explaining how to file a complaint.

Under the current complaint process, residents will receive an acknowledgment of their complaint in 24 hours and then wait again while the issue is investigated. The Applicant has up to **10 days** to substantiate and address the complaint, and, according to the Applicant, some issues may not be resolved at all. Even Appendix M of EM&CP 2 indicates that a complaint will be investigated “as soon as practicable” without any firm commitments to address issues real time. The Applicant’s intention appears to be to delay any response until it is too late to actually do anything about it.

Appendix M of EM&CP Phase 2 indicates that the Applicant’s plan relies on sound walls (with specific carveout preferential NYC standards for ratings that are not made for other locations), best efforts, field judgement and complaint triggering monitoring. It also identifies equipment-specific noise levels ranging from approximately 72 to 109 dBA. However, the Applicant does not appear to account for the cumulative noise generated by multiple pieces of equipment operating simultaneously, nor does it adequately characterize the noise that may actually be experienced by residents during continuous construction activities throughout the day and night. An equipment-by-equipment listing of sound levels does not, by itself, establish the cumulative noise exposure that nearby residents may experience under actual operating conditions. Further, with respect to noise, the Applicant states that local ordinances concerning noise, construction hours, and time-of-day restrictions are subject to the NYSPSC's determination regarding their applicability.

Given that EM&CP Phase 2 addresses specific, localized construction areas, the EM&CP Phase should expressly identify which applicable local requirements the Applicant will comply with and which requirements it contends are preempted, inapplicable, or otherwise not enforceable within each localized construction area. Residents should not be left to speculate as to what protections will apply during construction.

In addition, there appears to be insufficient substantiation regarding how noise will propagate at each individual construction site under both daytime and nighttime operating conditions. The analysis should account for factors affecting actual sound transmission and community impacts, including seasonality; foliage versus non-foliage conditions; local topography; water bodies; open fields; cleared areas; the location and elevation of nearby residences; and other site-specific characteristics. These factors are particularly relevant to evaluating impacts to residential quality of life.

For example, at Shore Road, the proposed clearing of more than two acres of established habitat represents a substantial alteration of the existing environment. The current plans also do not adequately address the displacement of wildlife/rodents resulting from the clearing or how such displacement will be managed to avoid or minimize secondary impacts to nearby residents. The removal of substantial vegetation and habitat may also materially alter existing acoustic conditions for residents located along the Hempstead Harbor waterfront. These site-specific changes should be evaluated rather than relying on generalized or illustrative assumptions regarding noise attenuation.

The proposed approach is unacceptable for a project of this magnitude because it creates a largely reactive system in which impacts are likely to occur before the Applicant is required to investigate or mitigate them. Real-time monitoring, prompt investigation of complaints, timely substantiation, and immediate implementation of appropriate mitigation measures should be required to protect the health, safety, welfare, and quality of life of residents in the impacted community. The noise complaint process described in EM&CP Phase 2, Appendix M, when considered together with EM&CP Phase 1, Appendix N, is wholly inadequate for a project of this size and duration. The proposed framework places substantial discretion in the Applicant's hands and does not demonstrate adequate consideration of the residents who will be directly affected by construction activities. The process should instead require:

1. **Real-time and continuous monitoring** throughout planned construction activities, including during nighttime hours;
2. **Real-time field investigation** of noise complaints while the alleged disturbance is occurring;
3. **Immediate implementation of mitigation measures** when monitoring or field observations establish exceedances;
4. **Prompt documentation and substantiation** of complaints, including measurements taken under the actual conditions at the time giving rise to the complaint; and
5. **Curtailement or modification of construction activities** where noise or other impacts are unreasonable, excessive, or cannot otherwise be adequately mitigated, particularly given that the proposed construction activities may continue for approximately six months.

Instead, the Applicant's proposed approach effectively places responsibility on community residents to endure the disturbance, submit a complaint, and then wait for the Applicant to determine whether and when an investigation will occur. The proposed framework appears to rely on a single Environmental Monitor and/or a superintendent who responds to complaints received through the Applicant's complaint management system. Under this framework, the superintendent is not necessarily notified immediately and then may investigate an issue "as soon as practicable," while the Environmental Manager has up to 24 hours, when deemed appropriate, to conduct a field investigation. The Environmental Manager may or may not take sound measurements and will consider whether additional mitigation is necessary only after the complaint has been substantiated, if at all.

This approach raises a fundamental concern: **if the investigation does not occur while the disturbance is actually occurring, how can the Applicant reliably substantiate the conditions experienced by residents?** Noise conditions may change rapidly as equipment is moved, construction activities cease or shift, weather conditions change, or the affected equipment is no longer operating. A delayed investigation therefore risks producing a record that does not accurately reflect the conditions that prompted the complaint in the first place. Residents should not bear the evidentiary burden created by the Applicant's failure to conduct contemporaneous monitoring.

Moreover, the Environmental Manager may have up to 10 days to address an issue before reporting it to the Department of Public Service. Such a timeframe is not appropriate for recurring or ongoing disturbances associated with 24-hour 7

day a week construction activities. A resident's quality of life cannot reasonably be protected by a process that permits an identified disturbance to continue for almost two weeks before meaningful corrective action is required.

Similar deficiencies appear with respect to lighting. As outlined in Appendix AE2, the Applicant again provides generic information identified as being "for illustrative purpose," which is subject to change and is not engineer-stamped. The materials do not adequately demonstrate how proposed lighting will operate under actual field conditions or address the cumulative effects of multiple 24/7 lighting sources mounted on towers.

The Applicant also fails to adequately evaluate potential impacts to sensitive receptors, including nearby residences, terrestrial and aquatic habitats, and vessels operating in the surrounding waters. The EM&CP should identify the anticipated lighting levels, locations, duration, orientation, and potential spillover at each relevant site, as well as the measures that will be implemented to prevent or minimize adverse impacts to nearby residents and environmental resources. The plan should also establish a clear and enforceable process for investigating and resolving lighting complaints.

The approaches outlined in EM&CP Phase 2, Appendices M and AE, and EM&CP Phase 1, Appendix N, are therefore unacceptable because if the investigation does not occur while the disturbance is actually occurring, how can the Applicant reliably substantiate the conditions experienced. Residents should not be required to endure potentially significant noise, lighting, or other disturbances and then wait for an Environmental Manager or other Applicant representative to respond "as soon as practicable" leaving the resident to endure hardships for an unknown period of time.

Further, if the disturbance cannot be replicated when an investigation finally occurs, there is a substantial risk that the complaint will be deemed unsubstantiated or otherwise discounted, despite the resident having experienced the disturbance when it occurred. This is particularly problematic for 24/7 construction, variable, or activity-dependent noise and lighting impacts.

The Applicant should be required to implement a proactive, enforceable, and contemporaneous monitoring and mitigation program. At a minimum, that program should include real-time monitoring during construction, sufficient hotline personnel and environmental managers to investigate and respond to complaints as they occur real time consistent with working hours for the project, contemporaneous field inspections and sound measurements where appropriate, immediate mitigation when warranted, and the ability to modify or curtail construction activities when impacts cannot be reasonably mitigated. Such measures are necessary to ensure that the health, welfare, safety, and quality of life of residents in the impacted community are meaningfully protected throughout the construction period.

B. Fugitive Dust Plan and Construction Activities

The Fugitive Dust Control Plan, as outlined in Appendix I-2, provides no protection for/or monitoring of the public water supply, sole-source aquifers, or private wells upon which residents rely. This omission is deeply concerning, particularly because the plan does not commit to identifying all materials that may be used in the management of the construction activities or evaluate their potential impacts on local water resources within the project work areas.

Appendix I states that propylene glycol may be added to the water used for dust control. This is especially concerning because the plan does not specify the concentrations or quantities that may be used. In excessive amounts, propylene glycol can pose risks to human health, pets, wildlife, wetlands and the environment. Without clear standards, monitoring requirements, or protective measures, residents have no assurance that local water resources will be adequately safeguarded.

Furthermore, Appendix I-2 states that the Applicant will use local municipal and/or private water supplies for dust control. However, the plan fails to address or evaluate the potential localized impacts of this water usage. This is particularly troubling for residents of Glen Head and Glenwood Landing, who rely on privately supplied water, pay directly for that service, and are frequently subject to water use restrictions, including during recent local fire emergencies. Unlike the temporary and infrequent water demands associated with firefighting, the Applicant's construction activities may require substantial daily water usage over extended periods. Such sustained demand has the potential to place additional strain on the local water supply and adversely affect residents. Despite this foreseeable impact, EM&CP Phase 2 does not evaluate the potential effects of the Applicant's water usage on local water availability or service, nor does it propose any mitigation measures to address those impacts.

Lastly, the Applicant needs to deploy a constant monitoring system and CAMP as air quality monitoring for the community should be required as opposed to visual or olfactory observations, or vague statements of considering dust control measures after 3 minutes in 60 minutes of dust leaving the project limits with no set plans for how this will be monitored or addressed especially if it happens on a regular basis. Also, the Applicant does not provide a listing of the dust suppressants they plan to use or the impacts to water resources.

As a result, EM&CP Phase 2 fails to adequately consider the potential consequences of their actions on local water resources nor does it provide a comprehensive assessment of impacts or an appropriate mitigation plan to protect the residents and water supplies of the impacted community. It is also overly vague as to ongoing air quality monitoring and what will be released into the air, and how monitoring will take place – if there are protocols for constant monitoring systems and CAMP they should be deployed from the start.

C. Unresolved Federal Agency Issues

EM&CP Phase 2 identifies unresolved issues with respect to Federal agency requirements concerning aids to navigation (“AtoN”) and burial depths. As set forth in Appendix C, there are substantial outstanding issues regarding the Applicants’ proposed approach—specifically, the relationship between planned AtoN clearances and the proposed cable burial depths. As of the filing date for this phase, these issues remain unresolved. Accordingly, it is difficult to understand how the Applicant can proceed with this Phase while also requiring a 30-day public comment period in circumstances where stakeholders cannot reasonably evaluate the proposed plan, particularly given that the issues identified are of such magnitude that substantial modifications are anticipated.

In addition, the filing is incomplete, as it should include all materials submitted to Federal agencies, including the NYS/USACE Joint Permit Application, as well as the original Federal and State correspondence and supporting documentation. Without those complete submissions and records, parties and stakeholders cannot obtain a full, non-biased understanding of the issues identified in this matter.

As noted in the below screen shot from Appendix C, safe distances to AtoNs are violated, and the Applicant’s proposed cable burial depths (initially six feet, revised to nine feet) are substantially shallower than the 8.2 meters (26.10 feet) requested by Federal agencies. The agencies are further concerned with vessel routes in both Hempstead Harbor and Long Island Sound, including the penetration clearance for even the smallest vessels (Appendix C, p. 11) of 7 feet. The Applicant also states that, to address the risk of damage associated with vessels transiting the relevant areas, burial depths would need to exceed 22 feet (Appendix C, p. 16), consistent with the requirements identified by Federal agencies. It is especially concerning that—based on the Applicant’s own statements—the proposed burial depths are inadequate for vessel traffic in Hempstead Harbor and Long Island Sound, which are active waterways with a wide range of recreational and industrial vessels, yet the Applicant continues to seek shallow burial depths and ignores previous anchor strikes with existing transmission lines that were buried years ago at substantially deeper depths than those proposed by the Applicant for this project.

Rather than curing inadequate burial depth deficiencies, the Applicant attempts to account for them by relying on 1,640-foot buffers (Appendix C, p. 15) and concrete mattresses to address anchor strikes. However, the filing does not include an analysis of the environmental impacts of the proposed concrete mattresses or impacts to current harbor usage as a result of the buffer zones. In addition, the Applicant defers discussion of a portion of these findings to future phases, including EM&CP Phase 5 open-water cable burial depths. To preserve all rights, the undersigned reiterate that this issue has not been resolved in Phase 2 and preserves the right to comment during future phases.

Updated ATON Table:

CG Aid to Navigation	LLNR	Assigned Lat (N)	Assigned Lon (W)	Recommended Minimum Safe Distance*	Cable to ATON Distance	Cable w/in MSD	Notes	Action Items
Bar Beach Light 11	27110	40-49-54.453	073-39-11.974	75	10	Yes	Between two cables. 30' closer than previous cable route. Inland of HDD exit point. ATON cannot be relocated.	USCG to provide as-built drawings for ATON. WSP to assess relocating HDD exit point outside MSD radius.
Hempstead Harbor Buoy 9	27095	40-50-24.593	073-39-29.878	244	30	Yes	100' closer than previous cable route. ATON can be temporarily relocated. ATON MSD overlaps all 4 cables	Given ATON's location and potential to move, USCG recommends cable be buried at 8.2m while the proposed burial depth by Propel is 6ft. WSP to assess and recommend concrete mattresses or other cable protection system.
Hempstead Harbor Anchorage Buoy A	27080	40-51-03.492	073-39-32.577	244	0	Yes	110' closer than previous cable route. ATON can be temporarily relocated. ATON MSD overlaps 1 cable.	Given ATON's location and potential to move, USCG recommends cable be buried at 8.2m while the proposed burial depth by Propel is 6ft. WSP to assess and recommend concrete mattresses or other cable protection system.
Hempstead Harbor Anchorage Buoy B	27075	40-51-09.492	073-39-33.077	244	50	Yes	150' closer than previous cable route. ATON can be temporarily relocated. ATON positioned directly above 1 cable.	Given ATON's location and potential to move, USCG recommends cable be buried at 8.2m while the proposed burial depth by Propel is 6ft. WSP to assess and recommend concrete

							ATON MSD overlaps 2 cables.	mattresses or other cable protection system.
Bailey Rock Lighted Buoy 3BR	25780	40-54-13.571	073-45-42.159	259	40	Yes	140' closer than previous cable route. All 4 HDD exit points overlap with ATON's MSD.	WSP to revise HDD exit points to prevent overlap with MSD radius. WSP to assess if concrete mattress or other cable protection systems are necessary after relocating exit points outside MSD radius.

The “plan-as-you-go” approach is deeply troubling. The Applicant specifies target burial depths but does not commit to any minimum burial depth. For example, correspondence with agencies states the following, including the absence of burial depth commitments:

“In Hempstead Harbor, if, after two attempts, a 9-foot target burial is not technically achievable in any portion of the Harbor due to seafloor conditions, the Applicant may use either of the following two alternatives for cable burial protection if necessary to prevent any habitat conversion within Hempstead Harbor:

- o Pre-lay secondary protection: Uraduct or similar cable protection system if it is known prior to installation that the target burial depth is not attainable.
- o Post-lay secondary protection: Concrete mattress with excavation and burial below the natural grade of the seabed underneath either a layer of native materials, installed via hand jetting, and/or imported and approved sand, installed by

placing sandbags on top of mattresses and opened by divers or by remotely operated vehicles (ROVs) so that the sand spreads to cover the mattresses.” (Appendix C, p. 36)

Given the foregoing significant unresolved issues that would affect HDD exits, cable alignments, and burial depths, EM&CP Phase 2 is deficient in that it does not address the matters it purports to address. Without resolution of the identified issues and the required agreements from Federal agencies, the Applicant has not met its obligations to address navigational safety, environmental impacts or planned configurations or alignments. EM&CP Phase 2 should not move forward until these identified issues are resolved.

D. Traffic

Appendix X provides insufficient detail regarding the Maintenance and Protection of Traffic Plan. The Applicant offers little in the way of concrete measures to protect residents, surrounding residential streets, and users of this heavily trafficked roadway, including motorists, pedestrians, bicyclists, and the North Shore School Bus Depot. Rather than providing construction-ready plans, the Applicant presents only “illustrative plans.” In light of the anticipated laydown yard, oversized deliveries, worker-parking areas, and multiple construction locations operating over several years, the proposed measures—such as temporary warning signage—are plainly inadequate.

Once again, the Applicant has failed to provide a plan containing a clear schedule and enforceable protective measures designed to minimize impacts on the safe and efficient flow of community traffic during essential commuting hours and to protect public safety. Traffic and safety impacts are well-documented concerns associated with projects of this nature. For example, concerns regarding insufficient traffic protections for residents during the CHPE project were addressed at a press conference held by County Executive Ed Day and Congressman Mike Lawler in October 2025.

The proposed plan does not establish specific procedures for major construction activities. It fails to identify the timing and routes for large-scale material deliveries, which are necessary to ensure that residential streets are not adversely affected. It also does not address worker arrival times, designated worker travel routes, or traffic controls necessary to prevent an already congested community from becoming further burdened by construction-related traffic on an access limited ingress and egress peninsula. Further, the plan does not explain how or when materials will be moved among multiple construction sites along the roadway. As such, there is a lack of comprehensive traffic-mitigation measures and routing protocols.

Given the proposed 24-hour, seven-day-per-week construction schedule, road closures during peak commuting periods could have severe consequences for residents, school district operations, and other roadway users, particularly because there are limited alternative routes in the area. Delays affecting District bus service could significantly disrupt educational programming, as the school bus depot is located within the center of the anticipated construction activity.

The plan also fails to address impacts on emergency services; the potential overflow of construction-related vehicles and traffic onto neighboring residential community roadways; or the environmental effects of heavy trucks and construction materials on local roads, including roadway deterioration, idling-related emissions, and pollution associated with the overall construction and its associated equipment.

A comprehensive Maintenance and Protection of Traffic Plan must prioritize the safety and well-being of the community, its residents, and all roadway users. These protections must be incorporated into every phase of the project rather than treated as an afterthought. Accordingly, the traffic plan submitted as part of EM&CP Phase 2 is materially deficient and should not be approved.

Conclusion

We are unable to comprehensively review the EM&CP Phase 1 or Phase 2 in this case due to the fact that the proposed Joint Proposal is still subject to change and can materially impact the provisional documentation provided to date by the Applicant. Further, the Applicant’s filings are incomplete, but yet Applicant (not the Commission) mandated extremely short periods of review time for parties and stakeholders when other matters requiring simultaneous responses associated with the proposed Joint Proposal were required. Nonetheless, we have identified serious concerns regarding the robustness of the plans outlined (based upon limited scope reviews due to timing constraints) as the impact on residents appears to be an afterthought. Phase 2 fails to give fair and reasonable consideration to all parties and stakeholders of the communities being impacted by the project and only provides illustrative plans as opposed to certified for construction plans, best efforts and a ‘figure it out as you go’ approach. It provides substantive protective measures for the Applicant

but fails to provide adequate protective measures for residents, businesses, schools and emergency responders in each impacted community.

Nothing in these comments should be construed as consent to or approval of the Project, prior, current or future EM&CP Phase/Phases, or any related construction activity. We reserve the full right to supplement these initial comments at a later date pending the response to the clarification and relief filing submitted on July 21, 2026, especially in light of the fact that the impact of what is being planned is irreversible and recent filings with FERC regarding Complaint of Long Island Power Authority vs. Neptune Regional Transmission System LLC under EL26-94 have the affidavit testimony of LIPA Executive Lucyna Khazanovich indicating Propel will not materially improve access to generation, it will only provide limited reliability benefits and not provide Long Island with its generation needs.

Sincerely

Doug Augenthaler and Christine Panzeca