

# Denise Toombs

## EDUCATION

MS, Resource Systems and Policy Design, Thayer School of Engineering, Dartmouth College

BA, Environmental Studies, Pomona College

## AREAS OF EXPERTISE

Infrastructure siting constraints and feasibility analyses

Environmental permitting, strategy

Regulatory and resource agency liaison, negotiations

Submerged lands assessments and lease development

Project development team coordination and facilitation

Marine/coastal issues and development planning

Impact assessment

## SELECTED CONFERENCE PRESENTATIONS

"Workshop on Biodiversity Beyond National Jurisdiction: State Jurisdiction and Control" Panelist, International Cable Protection Committee, 2023

"A Show of Resilience in Puerto Rico Post-Maria," SubOptic, New Orleans, LA, 2019

"High- and Low-Energy Marine Surveys: Making Sense of California's New Geophysical Survey Permit Requirements," Prevention First, Long Beach, CA, 2014

"Underwater Noise, Marine Species Protections, and Implications for Marine Operations," SubOptic, Paris, France, 2013

"New Frontiers and New Challenges: Managing Site Safety and Security," SubOptic, Paris, France, 2013

"Environmental Regulation of Energy Development: Offshore Energy,"

## EXPERTISE AND ACHIEVEMENTS

### Globally recognized expert in environmental permitting, marine and fiber capital projects

Global experience working with engineering, legal and construction teams to obtain approvals needed from multiple agencies to get the job done. Subsea cable systems, energy and oil and gas marine facilities, and associated terrestrial infrastructure.

### Thought leadership for subsea cable policy and project implementation

Member of working groups addressing policy developments affecting subsea cable installation and operation: ICPC working group on Biodiversity Beyond National Jurisdiction (BBNJ) and ongoing participation in a SubOptic working group on emerging issues. Multiple paper, poster and master class presentations for SubOptic, ICPC and other subsea events.

### Management of environmental, project and reputational risk over entire capital project life cycle

Strategic partner with clients managing risk over the full life cycle of infrastructure and assets, including long-term environmental compliance costs and relationships with regulators and stakeholders. Successfully handled all environmental permitting matters before federal and state agencies for multiple telecommunications submarine cables in California, including the California Central Coast. Permitting and environmental lead for subsea cables in a US National Marine Sanctuary.

## SELECTED EXPERIENCE – SUBSEA CABLE PROJECTS

**Multiple clients and locations: advisory, strategic planning support, cable landing feasibility studies.** Confidential project and advisory support includes agency negotiation and document review related to activity in National Marine Sanctuaries; commercial fishing issues and coordination for cable installation and inspections; strategy development for emerging regulatory issues. Multiple permit feasibility studies in the US and globally during the development stages of cable systems.

**JUNO Subsea Cable Project, Grover Beach, California. Technical, permitting lead.** Permits required included: Submerged Lands lease, California Environmental Quality Act (CEQA) compliance for California State Lands Commission (CSLC), Coastal Development Permit and federal consistency certification from California Coastal Commission (CCC), U.S. Army Corps of Engineers (USACE) permit and supporting Biological and Essential Fish Habitat assessments for resource agency consultations of marine species and habitat, marine archaeological resource assessment. Led agency

Continuing Legal Education Energy  
Conference, Denver, CO, 2012

"Lessons Learned from LNG and the  
Deepwater Port Act," American Wind  
Energy Association Offshore Wind  
Conference, Baltimore, MD, 2011

discussion including permit condition review and revision. JUNO was installed  
in early 2024.

**2Africa Cable System, Africa, Program Director.** Program Director for  
permit feasibility studies and full-scope permitting, including Environmental  
and Social Impact Assessments, for multiple countries in Africa. Provided  
regulatory and technical guidance, Customer liaison, from the feasibility  
stage through construction monitoring. The landing countries included in this  
scope of work: Mozambique, Tanzania, Madagascar, Kenya, Ghana, Cote  
d'Ivoire, Democratic Republic of Congo and Republic of Congo. Project  
challenges included multiple languages/translation of deliverables, a complex  
owner/developer structure, security for in-country site visits, stakeholder  
engagement and COVID restrictions.

**EQUIANO Cable System, West Africa, Program Director.** Program Director  
for permit feasibility studies and full-scope permitting for multiple countries  
in West Africa. Provided regulatory and technical guidance, Customer liaison,  
from the feasibility stage through construction monitoring. Permit feasibility  
studies included St. Helena, Ghana, Cote d'Ivoire, Democratic Republic of  
Congo and Republic of Congo. Full permitting was completed for St. Helena  
and Ghana.

**Los Angeles Cable Hub Permitting and Environmental Impact Report  
(EIR).** Partner-in-Charge for siting, permitting, and installation monitoring of a  
new telecommunications "hub" in the City of Los Angeles; the landing has  
capacity for four trans-Pacific fiber optic cable systems. The project also  
included the environmental permitting, entitlements, and stakeholder  
engagement on behalf of the system owner. The team prepared the EIR for  
the City of Los Angeles. The EIR addressed terrestrial impacts of fiber optic  
infrastructure to be installed in the public right-of-way, as well as the installed  
landing site at Dockweiler State Beach and the cable routes offshore. The first  
cable system, Pacific Light Cable Network (PLCN) was installed in 2018,  
followed by Curie in 2019.

**Cable Burial Inspection Survey Support:** SEA-US (Hermosa Beach,  
California), PC-1 (OCNMS Washington), PC-1 (Grover Beach, California), Pan  
American Crossing (Grover Beach, California).

**Subsea Cable Projects, Project Manager/Technical Director, Permitting  
Support:**

Confidential (South Africa)  
NUVEM (Multiple landings)  
PC-1 (California, Washington)  
JUNO (California)  
Oman-Australia System (Indian Ocean)  
Confidential (Massachusetts)  
2Africa (Multiple landings, East and West Africa)  
Equiano (Multiple landings, West Africa)  
EllaLink (Multiple landings)  
Grace Hopper (New York, Spain)  
Curie (Los Angeles, California)

PLCN/Los Angeles Telecommunications Hub (Los Angeles, California)  
Havfrue (Denmark, Norway, Scotland)  
X2/Zayo (California, Multiple landings)  
BRUSA (Puerto Rico)  
PAC (Grover Beach, California; Costa Rica)  
PCCS (Florida and Puerto Rico)  
AMX Cable System (Florida, Puerto Rico, Guatemala)  
West Africa Cable System (Multiple countries West Africa)  
ARCOS (Multiple countries, Caribbean)  
South American Crossing (Multiple countries, South America)  
Multiple permitting constraints and feasibility studies in U.S. and global locations. (Confidential)

### **Additional Telecom Projects**

**California Programmatic Mitigated Negative Declaration (MND) for Google Fiber Metro Fiber Buildout.** Partner-in-Charge for preparation of a Programmatic MND compliant with CEQA, assisting the client in negotiating conditions and routing considerations with municipal governments with permit authority. Intensive collaboration with the business and construction teams to site and route the assets to avoid additional permitting requirements and delays.

**Telecommunication Cable Extension Permitting Support in San Francisco Bay.** Partner-in-Charge for permitting a fiber optic cable re-route and horizontal directional drill (HDD) permits for a global telecommunications company. Permitting agencies included federal, state and local agencies. The scope included preparing the permit applications and supporting studies, including an eelgrass assessment. The team gained permission to use existing data and incorporate HDD control measures to avoid more extensive eelgrass surveys, saving the client time and money.