

-----Original Message-----

From: Colburn <colburndc@centurylink.net>

Sent: Wednesday, August 5, 2020 10:00 AM

To: HAVEL Chris * OPRD <Chris.Havel@oregon.gov>; HANSEN Ali <Ali.R.Hansen@state.or.us>

Cc: Lynnae Rutledge <lynae.rutledge@comcast.net>; David Yamamoto <dyamamoto@co.tillamook.or.us>; Mary Faith Bell <mfbell@co.tillamook.or.us>; REP Gomberg <Rep.DavidGomberg@oregonlegislature.gov>; bbaertle@co.tillamook.or.us

Subject: Edge Cable/Facebook Submarine Cable Project in Tierra Del Mar

Department of State Lands, Oregon Parks and Recreation Department:

I find the actions of Edge Cable and Facebook in Tierra Del Mar to be negligent in many ways. First, a densely populated neighborhood was not an appropriate site, second, it was through their own errors that the problems occurred and third, they should have immediately reported the abandoned equipment and thousands of gallons of drilling fluid left behind to the proper agencies and to the citizens of Tierra Del Mar.

I would like to know how, when and who conducted the initial assessment that supposedly “determined there to be no immediate environmental, health, or safety impacts “ due to the presence of the abandoned equipment and drilling fluid. I would also like to know exactly where the materials were left. How far offshore and at what depth were they abandoned? Is it possible to retrieve them and if not, why?

Facebook and Edge Cable have proven themselves to be unable to comply with the regulations for this project. They need to be held accountable for their actions. I ask that you, as stewards of our public beaches and coastline revoke their permits and easement, fine them and pursue all legal remedies against them for what looks to be a coverup of their actions. I ask that our state halts all submarine cable installation until this matter is fully investigated.

Please keep me apprised of any new information that is learned as well as your decision regarding revoking the permits and easement.

Sincerely,

Cathy Colburn

Sent from my iPad

From: Marie Cook <cookjmb@frontier.com>

Sent: Monday, August 3, 2020 3:21 PM

To: HELM Blake <blake.helm@state.or.us>; bill.ryan@dsl.state.or.us; HANSEN Ali <Ali.R.Hansen@state.or.us>; HAVEL Chris * OPRD <Chris.Havel@oregon.gov>; REP Gomberg <Rep.DavidGomberg@oregonlegislature.gov>; DEBLASI Michael <michael.deblasi@state.or.us>; Cameron La Follette <cameron@oregoncoastalliance.org>

Cc: Pat & Tom Rogers <patriciagroggers@mac.com>; Joanne and Don Olson <drojo1@comcast.net>; Lynnae Rutledge <lynnae.rutledge@comcast.net>; marge yost <myost3@cox.net>

Subject: Tierra del Mar

August 3, 2020

To whom it may concern regarding Project Jupiter, Tillamook County #851-19-000105-PLNG

I am a 1/3 owner of the property adjacent to and south of lot 3200 in Tierra del Mar.

I was extremely dismayed by the State agencies initial approval of the Jupiter Project. Recently, it has come to light that Edge Cable has not only been negligent in their construction practice and but have also violated County permits. I would expect and request DSL and ORPD to rescind their prior approval and disallow Facebook and Edge Cable to continue this project in Tierra del Mar.

It is an absolute travesty to see what has been done to the previously undeveloped, forested property, identified as Lot 3200. The property is now completely devoid of foliage, covered with gravel and enclosed by a cyclone fence! Approvals by Tillamook County, DSL, ORPD, Army Corps of Engineers, and Oregon Department of Fish and Wildlife have allowed Face book/Edge Cable Holdings, USA, to locate the Jupiter Project on a parcel of land UNSUITABLE for said construction (Tillamook County conditional use criteria #3) and dramatically and drastically ALTERING the character of the surrounding areas for permitted uses (Tillamook County conditional use permit #4).

Even after months of protests, letters, and meetings by the residents of the Tierra del Mar community in opposition, the Tillamook County Planning Commissioners voted to the approve the construction of a fiber optic cable landing site on Lot 3200.

The aftermath of the land excavation, influx of heavy construction equipment and drilling have impacted the neighboring residences unfavorably. Our property alone has incurred a broken water main, widening of concrete cracks in the garage and driveway, increase in rodent population and foundation shifting resulting in doors not closing properly. (Other issues may well ensue).

I recently learned that Edge Cable has not paid Aangel Traffic Control for services rendered in connection with the Jupiter project. It is yet another example of Facebook/ Edge Cable's irresponsible practices.

Sincerely,

Marie B. Cook

August 3, 2020

To whom it may concern regarding Project Jupiter, Tillamook County #851-19-000105-PLNG

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Sincerely,

Marie B. Cook

From: robin kostrikin <rkostrikin@hotmail.com>

Sent: Sunday, August 2, 2020 8:50 PM

To: HAVEL Chris * OPRD <Chris.Havel@oregon.gov>; HANSEN Ali <Ali.R.Hansen@state.or.us>

Subject: Edge Cable

What residents in Tierra Del Mar and those of us who are neighbors feared has happened and Edge Cable have created an environmental hazard to the area and been totally irresponsible? We want good stewards of the environment and they have demonstrated they are not. We need to protect our natural resources from outside corporations who don't care about the damage they do to our coastline. Revoke their permit now.

Sincerely yours,

Robin Kostrikin

Pacific City full-time resident

From: Tierra del Mar Association <tierradelmarcommunity@gmail.com>

Sent: Monday, August 3, 2020 6:52 AM

To: HELM Blake <blake.helm@state.or.us>; bill.ryan@dsl.state.or.us; HANSEN Ali <Ali.R.Hansen@state.or.us>; HAVEL Chris * OPRD <Chris.Havel@oregon.gov>; REP Gomberg <Rep.DavidGomberg@oregonlegislature.gov>; DEBLASI Michael <michael.deblasi@state.or.us>; Cameron La Follette <cameron@oregoncoastalliance.org>

Subject: Tierra Del Mar response to Edge Cable/Facebook abandoned equipment

Please see the attached response from the Tierra Del Mar Community Association regarding the recent developments concerning the abandoned equipment and drilling fluid by Edge Cable/Facebook.

Thank you,

Tierra Del Mar Community Association



Tierra Del Mar Community Association

Ali Ryan Hansen
ali.r.hansen@state.or.us

Bill Ryan
bill.ryan@dsl.state.or.us

Chris Havel
chris.havel@oregon.gov

Representative David Gomberg
rep.davidgomberg@oregonlegislature.gov

Blake Helm
blake.helm@state.or.us

Michael De Blasi
michael.deblasi@state.or.us

Jason Miner
Jason.miner@oregon.gov

July 30, 2020

RE: Edge Cable/Facebook Abandoned Equipment and Drilling Fluid

Department of State Lands, Oregon Parks and Recreation Department:

Thank you for notifying our community of recent developments in the Edge Cable/Facebook drilling project in Tierra Del Mar. As you know, many in the Tierra Del Mar community were and still are, strongly opposed to this large-scale industrial/commercial drilling project taking place in the middle of our small densely populated residential neighborhood.

Your office has notified us of the equipment and the 6,500 gallons of drilling fluid that were abandoned by Edge Cable/Facebook under the ocean floor just off the coast of Tierra Del Mar. We find the lack of transparency and timely notification to state and federal officials displayed by Edge Cable/Facebook to be concerning. We expect that you find the delayed emergency notification of abandoned equipment and drilling fluid by Edge Cable/Facebook equally concerning and unacceptable.

In the interest of public safety in Tierra Del Mar and concern for our nearshore ocean, we request that when reviewing and evaluating the conduct of Edge Cable/Facebook and their representatives in this matter, you take corrective action concerning the viability of the continued industrial/commercial drilling at this worksite in our residential community. We also respectfully request you hold Edge Cable/Facebook accountable and withdraw their state permits and easement.

Sincerely,

TIERRA DEL MAR COMMUNITY ASSOCIATION

From: Mary Voboril <SailorDiver@yahoo.com>

Sent: Friday, July 31, 2020 12:09 PM

To: SENNEWALD Jay * OPRD <Jay.Sennewald@oregon.gov>; HAVEL Chris * OPRD <Chris.Havel@oregon.gov>; HANSEN Ali <Ali.R.Hansen@state.or.us>; kinsey.m.friesen@usace.army.mil; Representative David Gomberg <rep.davidgomberg@public.govdelivery.com>; bbaertle@co.tillamook.or.us; dyamamoto@co.tillamook.or.us; RYAN Bill <bill.ryan@state.or.us>; mfbell@co.tillamook.or.us

Subject: Facebook/Edge Cable malfeasance

So. Here we are again: The intrepid David, shall we say, of Tierra Del Mar v. the arrayed Goliaths of Facebook.

What statewide planning goal or county comprehensive plan, let alone moral universe, allows a stupendously rich high-tech firm to abandon, in perpetuity, tons of industrial machinery and 6,500 gallons of drilling fluid on public property? And not just public property but a popular beach in a vulnerable earthquake zone?

As an added affront, Facebook covered up the fact of this abandonment for 50 days. Don't you, as stewards of public lands and the public trust, find this added fact offensive and insulting?

(It's also curious that a marine survey, prior to drilling, didn't turn up the presence of "hard material" before said material destroyed the drill bit. Did Facebook, rich as it is, or its subsidiaries and subcontractors cut corners here, and are they still?

(Further, apparently there was no plan, even a rudimentary one, for a worst-case scenario of this type. Surely this doesn't meet your standards.)

And now, on this residential lot, Facebook intends to push forward with a second beach manhole and a second try at horizontal drilling through the mysterious "hard material."

Please don't let them. End this now, before additional damage is done. Facebook has acted in bad faith and, having done so, is not deserving of your trust. Please revoke their permits and end this ongoing fiasco, this affront to the common good.

Yes, Facebook is globally powerful, and as such it commands attention. But here at the local level its people are playing us, and playing by their own rules. Please don't be swayed by any smooth, smarmy assurances that all will be different the second time around.

Early on, interested parties warned that this project could have unintended consequences. And so it has, with worse, perhaps, to come. How big will a tectonic event have to be to cause catastrophic harm? How about shifts in ocean currents or a series of big Pacific storms, roiling the ocean floor?

This addresses the situation as it now stands. How much added harm would be caused by a second engineering failure at this site?

Facebook's Jon Hudson has acknowledged, under oath, that this residential lot is not the only, all-or-nothing site for its trans-Pacific cable work on the Oregon Coast. Facebook has identified other suitable sites. It can go to a non-residential locale, and it should.

This time, please listen to the "David" of Tierra Del Mar and preclude a second assault by this high-tech, high-handed giant. Again, please revoke the permits.

Sincerely,

Mary Voboril
5800 Irish Avenue
Tierra Del Mar, Oregon 97112

From: Dan Wilensky <thedanwilensky@gmail.com>
Sent: Thursday, July 30, 2020 1:53 PM
To: HAVEL Chris * OPRD <Chris.Havel@oregon.gov>
Subject: Edge Cable Holdings vs. Tierra Del Mar

Hello Chris,

I'm sure you've been hearing it from all sides, so I'll keep this short.

If ORPD and the other "gatekeepers" of the Oregon Coast don't realize their disastrous error in judgement in allowing Facebook and Co. to have their way with our beach, neighborhood, and ocean, it's clear who they represent. It's bad enough already. PLEASE end this idiotic experiment in ignoring unanimous public will. The long-term consequences are as clear as the water used to be.

Sincerely,

Dan and Deb Wilensky
Tierra Del Mar

SEEGER Billie * OPRD

From: Cameron La Follette <cameron@oregoncoastalliance.org>
Sent: Wednesday, July 29, 2020 5:17 PM
To: RYAN Bill; HAVEL Chris * OPRD; MINER Jason * GOV; Senator Arnie Roblan;
Representative David Gomberg
Cc: Charlie Plybon
Subject: Letter on Facebook/Edge Cable drill accident, Tillamook County
Attachments: ORCA & Surfrider to Agencies re Edge Cable Drill Accident July 2020.pdf

Dear officials,

Please see the attached letter outlining the grave concerns of Oregon Coast Alliance and Surfrider Foundation concerning the April 28, 2020 Edge Cable submarine cable drilling accident, which was subsequently exacerbated by failure to report for nearly two months the abandonment of equipment, leading to a likely inability to recover the items.

We propose legislative and administrative solutions to this fiasco, so a similar accident will not happen again and leave the state in the lurch.

Thank you,

Cameron La Follette
Oregon Coast Alliance

and

Charlie Plybon
Surfrider Foundation



Oregon Parks and Recreation Department
Oregon Department of State Lands
Representative David Gomberg
Senator Arnie Roblan
Jason Miner, Governor's Office

July 27, 2020

Dear Officials,

On Friday afternoon July 24, 2020, Oregon Coast Alliance, Surfrider Foundation and other interested members of the public, received an email from the Parks and Recreation Department, which enclosed an email from the Oregon Department of State Lands. The email notified recipients that Edge Cable, a subcontractor for Facebook, laying a submarine cable in the Territorial Sea with a landing at a residential lot in Tierra del Mar, had failed to notify the agencies for nearly *two months* that the April 28, 2020 drilling accident was more complex than originally understood.

Edge stated that the accident resulted in leaving large amounts of drilling-related trash in the ocean, including: 1,100 feet of drill pipe, a drill tip, a gyro module, a steering tool, and 6,500 gallons of bore gel in the drill prism. Worse yet, the late notification has, according to Edge and DSL, precluded retrieval of the trash. Thus, the bore gel, though currently encapsulated, is in danger of eventually spilling from ocean corrosion or subfloor erosion.

The accident represents negligence on behalf of the operator, as the equipment was pushed beyond its limits, putting lives and Oregon's natural resources at risk. Failure to notify the agency, and abandonment of equipment now apparently unrecoverable on and below the ocean floor, is not only a violation of Edge Cable's permit(s), but represents a continuing and permanent trespass of public lands.

Incredibly, Facebook/Edge Cable has indicated it desires to continue the project in January 2021, and inquired of the state agencies how best to move forward. OPRD sent Edge Cable a letter on July 17, 2020 stating that their OPRD permit was still valid, as long as other necessary permits were also valid. The agency has asked for more information, including an independent hazard analysis. DSL is still evaluating its options.

This is all unacceptable. Whatever other information may be needed, especially concerning the possibilities and methods of abandoned equipment retrieval, Facebook/Edge failed to report the extent of the accident for nearly two months. That alone identifies them as unreliable and untrustworthy. They have violated permit conditions, as well as created a permanent state of trespass by the failure to report in a timely manner. There can be no question of renewing or extending the DSL and OPRD permits and the DSL easement. Oregon Coast Alliance and Surfrider call upon the agencies to do the following things immediately:

1. The Department of State Lands and the Parks and Recreation Department must **withdraw** their permits and easement to Edge Cable for this submarine cable project wholly, without possibility of reapplication.
2. The State of Oregon must assess a large fine against Edge Cable and its relevant subcontractors, of sufficient magnitude to provide the state with funds to study how best to remove the drilling trash Edge Cable left under the nearshore ocean, undertake the removal if possible, and ensure the company pays for all the state's costs in dealing with this fiasco.

Oregon Coast Alliance and Surfrider call upon the Legislature to undertake the following at its next opportunity:

1. Update Part IV of Oregon's Territorial Sea Plan and pass legislation creating strict siting standards for submarine cables that require a showing of "need," prohibit landing them in residential areas, provide extensive fines for failure to report, failure to remove trash from accidents, and/or failure to adequately reclaim land or waters following an accident.
2. Set up a statewide bonding program administered by a state agency, such as the Department of State Lands, that will provide the state with the full amount of funding from the company to undertake recovery of trash dumped in or under the ocean in the event of an accident like this one, and to cover associated restoration costs.

Submarine cable projects must be held accountable, and be managed with strong policy tools that protect our natural resources and ocean habitats. When the State of Oregon was faced with a similar dilemma in planning wave energy for our Territorial Sea, fishermen and other ocean users were adamant about developing strong policy requirements around abandonment and derelict equipment. In addition to an entire new chapter in our Territorial Sea Plan (Part V), legislators were quick to pass bonding requirements, which served the State well when Finnavera lost a buoy off Newport that sank to the ocean floor just prior to crab season. Doesn't boring through the ocean floor, under the ocean shore and into

neighborhoods deserve the same level of protection and accountability as ocean renewable energy? Given the Oregon Fisherman Cable Commission recently recommended a change in inspection requirements in Part IV of Oregon's Territorial Sea Plan (TSP), which guides uses of the seafloor for telecommunications, we feel this is an opportune time to strengthen the policies within that portion of the TSP.

Oregon Coast Alliance and Surfrider do not think the state agencies tasked with protection of our beaches and nearshore ocean can or should allow Facebook and its subcontractor Edge Cable to initiate the project a second time. The company has made it clear that they are unreliable, careless, environmentally thoughtless and incompetent. They additionally flouted reporting requirements without a qualm.

Please withdraw the company's state permits and easement, and protect the beaches and territorial sea. Let us then begin putting legislative safeguards in place, so this does not happen again with another submarine cable project in the future. Our coast is far too important to Oregonians, and ecologically fragile, for such projects to be allowed ever again without safeguards.

Sincerely,

Cameron La Follette
Executive Director
Oregon Coast Alliance

and

Charlie Plybon
Surfrider Foundation

SEEGER Billie * OPRD

From: Jan & Larry Farmen <ljfarm1@gmail.com>
Sent: Wednesday, July 29, 2020 4:23 PM
To: HANSEN Ali; HAVEL Chris * OPRD
Cc: Lynnae Ruttledge; Cary Morris
Subject: Edge Holdings Inc. Fiber- optic cable Project

Good afternoon ,

As property owners in Tierra Del Mar I am very concerned about the re-permitting of this Facebook fiasco . I respectfully request that those involved in this process " Do the right thing" : Revoke the permits for this destruction in our neighborhood ! This catastrophic mess is an egregious wound to our once tranquil community.

Permits for this industrial installation should never have been issued . Lack of compliance and oversight have sadly led to our current situation. You now have the opportunity and responsibility to end this fiasco and it's associated chaotic mess.

Please do not allow this project to continue . This has been a disturbing example of corporate strong-arming to internalize profits while externalizing environmental and community damage .

The trashing of and chaos in our community must be stopped !!

Larry J. Farmen & Janice K. Farmen

SEEGER Billie * OPRD

From: Steven Chambers <steverc@comcast.net>
Sent: Wednesday, July 29, 2020 3:28 PM
To: HAVEL Chris * OPRD
Subject: Facebook/Edge project in Tierra del Mar

Dear Mr. Havel:

My wife and I have had a beach cabin in Tierra del Mar for over 45 years. We have enjoyed the quiet, neighborly community and the pristine beach. We are owners, not renters. Our son and daughter value our peaceful community for the same reasons.

We have been opposed to the Facebook/Edge project from the start of our awareness that the companies were trying to fast track their efforts without any communication with the residents and property owners of Tierra del Mar. I testified before the State Land Board last year in opposition and would like to go on record at this time to have the permits for Facebook/Edge revoked forthwith.

As a supposed "public utility," Facebook/Edge has a responsibility to provide services to our community, which they are not doing, nor have they ever had any intent to do. Essentially, it is a case of the big guy running roughshod over the little guy. With the equipment failures and chemicals being left, the feasibility of the project is questionable, even suspect.

As literally thousands of satellites are currently being put into space by Jeff Bezos, Elon Musk, and others designed to provide internet coverage which will cover the globe, Facebook's project may be obsolete before it can even be completed.

Please revoke Facebook/Edge's permits NOW.

Steve Chambers

1790 19th St. NE, Salem OR 97301

steverc@comcast.net

503-364-5767 or 503-580-0570

Cabin at 5815 Pier Ave, Tierra del Mar

From: lyndasteiner@aol.com <lyndasteiner@aol.com>

Sent: Wednesday, July 29, 2020 12:54 PM

To: HAVEL Chris * OPRD <Chris.Havel@oregon.gov>

Subject: Facebook Project

Hi Chris....long time since we have communicated with one another but I read about your statements often in The Oregonian pertaining to Park issues(at this time, BEACH problems with being over enjoyed!) Can't believe our beach here in Tierra Del Mar during COVID19----toooooo many people without masks....anyway, so glad to see your name in print and hope all is well.

I am writing to you about my on-going concerns and objection regarding Facebook's fiber-optic cable being developed in TDM..Please read my letter attached, opposing this project early on....as you see, one of my main concerns related to expertise in constructing this cable and now we know, a significant error has occurred with drilling---what next? I am very disheartened that this project got permits and even without permits, work has been carried on as if all is approved. Last week and this week, construction with cable burying continues on Sandlake road....as you may know, we have an appeal filed with DSL and hope they will overturn any previous decisions regarding this project but I remain very skeptical as it looks like ALL SYSTEMS GO regardless of how our community is affected.....just wanted you to know I am still fighting for what I think is best for this beautiful coast....please take into consideration my concerns and pass them on to those who have a voice and a decision to make on this subject.....thanks for all you do, Chris, and again, best of luck to you and yours....stay safe my friend.....Lynda

-----Original Message-----

From: HAVEL Chris * OPRD <Chris.Havel@oregon.gov>

To: HAVEL Chris * OPRD <Chris.Havel@oregon.gov>

Sent: Fri, Jul 24, 2020 4:48 pm

Subject: FW: Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Please see the message below for an update from the Oregon Department of State Lands on the Edge Holdings project to install a underground cable near Tierra del Mar in Tillamook County. The Oregon Parks and Recreation Department is likewise reviewing its options under the conditions of the ocean shore permit it issued to install this cable under the ocean shore.

--

Chris Havel, Oregon Parks and Recreation Dept., (d) 503-986-0722, (c) 503-931-2590, chris.havel@oregon.gov

From: HANSEN Ali <Ali.R.Hansen@state.or.us>

Sent: Friday, July 24, 2020 4:23 PM

Subject: Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Edge Cable Holdings, Inc. has notified the Oregon Department of State Lands (DSL) that drilling equipment was left behind during an undersea fiber-optic cable project near Tierra Del Mar.

Project representatives informed DSL that on April 28, 2020, the drill pipe snapped. The pipe was being placed at a depth that ranged from 40 to 69 feet. Subsequently, approximately 1,100 feet of drill pipe; a drill tip; two tools for drill steering and tracking; and approximately 6,500 gallons of drilling fluid were abandoned. *See below for equipment information.*

Edge Cable did not notify DSL of the abandoned equipment until June 17, 2020. The delay in notification eliminated any potential options for recovery of the equipment.

DSL is evaluating options for corrective action as well as the viability of continued work at the site. Initial assessment determined there to be no immediate environmental, health, or safety impacts due to the presence of the equipment. DSL is continuing to assess potential impacts.

Equipment Information

- ~1,100 feet of 5-7/8-inch (outer dimension) drill pipe
- 10-5/8-inch diameter carbide drill tip
- ParaTrack Gyro Module
- ParaTrack Steering Tool
- 6,500 gallons of drilling fluid containing Bore-Gel, Quick-Bore and Pac-LE

Ali Ryan Hansen | Communications Manager

Oregon Department of State Lands

775 Summer St. NE | Salem, OR 97301-1279

503-986-5298 (desk) | 503-510-6860 (cell)

ali.r.hansen@state.or.us

www.oregon.gov/dsl

February 11, 2019

Oregon Parks and Recreation

Attn: Jay Sennewald – OPRD Ocean Shores Coordinator
12735 NW Pacific Coast Highway
Seal Rock, Oregon 97376

Subject: OPRD Permit #: 2900-18 & 2906-19
Applicant: Edge Cable Holdings USA, LLC

Good Day:

Using OPRD's permit criteria in OAR 736-20, please find my comments, concerns, questions and objections to Edge Cable Holdings USA, LLC Ocean Shore Permit Application.

736-020-0005 – Factors Evaluated

1a – This project is not in keeping with the conservation of Tierra Del Mar's water supply, a natural resource that must be used wisely and protected. As stated in the Permittee application, the preparation of drilling mud requires the use of a large volume of water. The project's water source will be provided by a fire-hydrant located nearby the work site, if the application is approved. However, Tierra Del Mar does not have fire-hydrants. Our sole water source comes from an underground spring located east and along Beltz Creek. Tierra Del Mar Water Company supplies each developed property with this water source. During summer months, our water supply reaches very low levels. In past dry months, it was necessary to stop supplying water to each property in order to conserve this natural resource. Assuming the Permittee is using Tierra Del Mar's water system, it would adversely impact Tierra Del Mar's supply of water at a time it is most needed. Also impacting our water supply would be the need for fresh water in addressing an inadvertent drilling fluid release on the project site. Putting at risk Tierra Del Mar's water supply for a commercial project is not in the best interest of preserving this natural resource needed for the community.

1c - This project will not be suitable or compatible with the uniqueness and quietness of Tierra Del Mar's beach and community. Tierra Del Mar has remained commercially undeveloped throughout our history and residents wish it will remain so. Development of this project will adversely impact our community due to construction noise, dust, and vibrations from industrial drilling machines. Traffic flow and delays will most likely take place due to the transport of heavy equipment to the job site. Difficulty for recreational users in vehicles, wanting access to Tierra Del Mar's designated beach entrance, will experience delays or the inability to access the beach. Beach walkers, who use Sandlake Road for parking, could experience loaded parking areas, thus denying them access to the beach.

2 - As stated in OPRD's criteria, public opinion in response to public notice or hearings on an application, shall be considered in evaluating a proposed ocean shore project. Please note, our community and other interested parties overwhelmingly object to this project. Our hope is that OPRD's denial or approval of this permit will be seriously evaluated.

736-020-0010 General Standards

1 – Project Need – Although there may be a need for this project, there is not adequate justification for altering the integrity of Tierra Del Mar's community or its ocean shore area.

3 - Public Laws – The Permittee has not complied with the permitting process. During the last week of January, 2019, the Permittee brought heavy equipment to the Tierra Del Mar area and began doing right-of-way work as a "public utility". They do not have approved permits from the US Army Corps of Engineers, the Department of State Lands, OPRD, or Tillamook County. All work was stopped and all equipment being used was withdrawn after Tillamook County was informed about this violation. The integrity of the Permittee must be questioned, considering this violation. Future construction, if granted, must be cautiously observed.

4 – Alterations/Project Modifications – There is an existing landing (BMH) in Pacific City that the Permittee could easily and effectively connect to. By landing their cable and conduit on Tierra Del Mar lot #3200, Permittee states that public user conflicts will be potentially avoided. This is not the case as it relates to Tierra Del Mar. One route to and from Tierra Del Mar, as well as beach access, will be negatively impacted during the estimated project date from June, 2019, to November, 2019. Pacific City, with its existing shore based facility on Pacific Avenue, will not experience traffic disruption or delays because Pacific Avenue is not a through street. The previously approved landing site in Pacific City, being used for this project, would eliminate terrestrial and possible marine habitat impacts that could occur with construction activities beginning on Tierra Del Mar lot #3200, crossing the beach and entering the ocean.

736-020-0015 – Scenic Standards

2 – Shoreline Vegetation – Although Permittee must replant the construction site on lot #3200, if the permit is approved, it will never look the same! Lot #3200 now has shore pines and native plants that enhance the aesthetics of this area. The foredune, created by prevailing winds and wave action, has protected the native plants on this lot. Due to the majority of Tierra Del Mar's oceanfront lots being developed, lot #3200 is unique, thus valuable because it hasn't been degraded by human activity.

4 – Compatibility with Surroundings – As mentioned earlier, this project is not compatible or suitable for Tierra Del Mar's quiet residential community. Once commercial development begins, what will future development of lots be approved for? Development of lot #3200 may become a precedence for other negatively impactful projects, which our community has and will continue to oppose.

736-020-0020 – Recreational Use Standards

1 – Recreation Use – Project activities during the proposed construction dates from June, 2019, to November, 2019, could result in disruption to beach users and recreational events. Tierra Del Mar is the site for the 11th annual Blowsion Surf Slam, which will take place this year on September 6-8. Over 100 pro, amateur, and first time rookie jet skiers from around the world, will compete for cash prizes and points toward the international IFWA World Title as well as the Blowsion Surf Slam championship. The spotlight on wave surfing and aerial maneuvers bring many attendees as well as vendors and sponsors. A specific area is allocated for these participants as well as a food and beverage location. Tierra Del Mar was chosen years ago for this annual event because of the beauty and the unpopulated, easy access beach area. This project will be a detriment to this event.

2 – Recreation Access – Blocking off or obstruction to the only public access to the Tierra Del Mar beach during the summer or during the Blowsion Surf Slam, is unacceptable. Construction and other personnel working on the project will need additional parking space, thus limiting parking along Sandlake Road for beach users and event attendees. Traffic congestion and noise from the construction site will adversely impact the event and beach users.

736-020-0025 – Safety Standards

According to an article written by Netwas Group Oil on September 19, 2018, potential risks are a part of all HDD projects. As stated, due to the rapid increase in HDD construction, the skill and experience of many HDD contractors are questionable, being they are new to the field. One risk mentioned-soft or loose soils(sand) present a high risk of collapse during HDD operations. Bore hole collapse severely impacts the chances of success on any HDD project. The worst risk-inadvertent release of drilling fluids into the soil and or water, is a major environmental concern. As noted on Permittee's application, the fluids used, Bore-Gel, Quik-Bore, PacTM-LE, are considered by the EPA Hazard Class as all being labeled "Acute Health Hazard" and "Chronic Health Hazard". As listed, each chemical is listed as; a human carcinogen; having acute fish toxicity; acute crustacean, algae, and microorganisms having undetermined or no ecological information available. Also of concern are inadvertent releases of oil, gas, or other hazardous material from construction related vehicles and equipment. Although this application addresses an Inadvertent Release Contingency Plan, it would be to the advantage of all parties involved, if Permittee would identify a WORSE-CASE-SPILL scenario and demonstrate that adequate spill response equipment is available on site. What preventative measures will the Permittee implement to avoid spills BEFORE THEY OCCUR? Fracture detection, corrective actions for an inadvertent release, containment of drilling fluid release and clean-up releases have been addressed pertaining to the detection of a hazardous event AFTER TAKING PLACE.

2 – Obstructional Hazards – Permittee acknowledges construction related activities will increase traffic. As mentioned previously, access to Tierra Del Mar and our beach will be negatively impacted. Safety could become an issue as during the summer months, emergency vehicles are

often responding to the Sand Lake Recreational Area due to ATV accidents, needing immediate services. Pacific City provides all the areas emergency needs thus having to travel to Sand Lake Recreational Area, or any other emergency, could delay their time responding to an incident, due to traffic issues in Tierra Del Mar. A few minutes delay could become a life or death situation.

3 – Neighboring Properties – Ocean erosion and safety problems on the construction site could negatively impact neighboring properties. Terrestrial construction activities including excavation, trenching and grading could potentially aggravate erosion by exposing additional volumes of sediment to weather and tides. Tierra Del Mar has a history of extreme erosion. OPRD has granted emergency permits to protect the dune area from being eroded to the point that the dune became a safety hazard to beachfront property owners. Each year, high tides and strong winds, bring logs and debris onto Sandlake Road, near and beyond the public beach access. Tillamook County road crews often must remove large debris from this road so traffic can enter and exit Tierra Del Mar. Permittee has not addressed erosion issues for beachfront properties or for the possibility of cable exposure from erosion or tidal flows. Also, a sea level rise analysis should be required. Scientists have stated that sea level rise is a prevalent event that is now and will continue to take place. As sea levels rise, wind and wave action, under normal or extreme conditions, will reach further inland, leaving open the potential for increased erosion and deposition of beach sand. Under future ocean and weather conditions, there is the possibility that buried components(cable) under the beach will become unburied. Neighboring properties will also be exposed to construction noise, dust, substantial vibrations from drilling and hazardous materials flowing to their properties due to an inadvertent fluid release. Septic systems are old in Tierra Del Mar, thus there is the possibility that constant vibrations during this project will put at risk adjoining systems. Water lines to adjacent properties are old and will be susceptible to breakage. Home foundations may crack due to HDD vibrations. Is there a contingency or mitigation plan protecting neighboring property owners from any of these risks? A quiet residential community is not the place for this project.

4 – Property Protection – Permittee has stated that lot #3200, after completion of the project, will be developed into a single- family residence. The site area will be cleaned and cleared of rubbish but there is no mention of a test for hazardous materials released into the soil on lot #3200. If this project is approved, future property owners must be assured the land they build on is hazardous free. Will there be an environmental survey on this lot once the project is completed?

736-020-0030 – Natural and Cultural Resource Standards

1a – Fish and wildlife resources – Permittee did not address fish and wildlife resources in their application. A qualified biologist should conduct a pre-construction survey for the presence of threatened, endangered and species of interest. The federally protected western snowy plover's designated critical habitat area lies north of Tierra Del Mar beach. The area is part of OPRD's Sitka Sedge Natural Area. Snowy plovers have inhabited this area successfully for the past 3 years. Precautions should be taken to protect them from any adverse conditions this

project may bring. Their nesting, breeding, foraging, and fledgling season begins in March and ends in September. I suggest Vanessa Blackstone, OPRD's wildlife biologist, in charge of the snowy plover project, be contacted for her concerns and comments regarding this application. Being a volunteer for OPRD and Audubon with surveying the snowy plover for the past 3 years, I have found these birds frequenting all areas of the Tierra Del Mar beach. I have observed them outside of their critical time (March to September) foraging along the beach north and south of the project area. There should also be concern for benthic species that use the sandy beach areas and the soft bottom areas of Tierra Del Mar's beach. These under the sand and shallow water species will be negatively impacted during cable burial. These organisms have limited mobility thus they cannot easily escape during cable burial. They will either be displaced, smothered, or crushed during this process. They do not repopulate easily once their habitat is disturbed. Being they are a food source for other marine and shoreline species, their presence is a valuable resource that could be affected.

Hazardous fluids which may reach the shore or shallow waters due to a construction incident, could negatively impact fish. In cases of inadvertent fluid releases to open water, Permittee states that it may be impractical to contain the release. If this occurs, there is no guarantee that fish and other species will be safe from this project.

1c – Historic, cultural, archeological sites – Project related activities have the potential to disturb or damage Native American artifacts and shipwrecks of cultural resource value. Permittee has not addressed this subject on their application. There should be a cultural record search or consultation with the State Historic Preservation office, the Confederated Tribes of the Siletz and Grande Ronde. An Inadvertent Discovery Plan should be in place if any cultural artifacts are discovered during the project construction.

1e – Air and water quality – Air quality issues for the adjacent properties may experience dust and release of powder chemicals during HDD activities. Ocean shore and ocean water, as mentioned earlier, may be adversely impacted due to an inadvertent drilling fluid release. Permittee has explained their contingency plan in case of an inadvertent hazardous release but as stated earlier, what measures will be taken to prevent spills BEFORE THEY HAPPEN?

736-020-0032 – Permit Conditions

1 - The Permittee has not complied with the rules of other federal, state, and local agencies during the permit process. No permits have been given thus Permittee violated the permit process when they began work in Tierra Del Mar during the last week in January, 2019. Equipment and construction vehicles were withdrawn from the road site as they were in violation. What fines or warnings did each agency present to the Permittee? The integrity of Permittee brings to question what violations will take place during the project if they do not respect the permit process?

Conclusion: Although OPRD is a neutral party in this permit process, you do have the ability to approve or deny the application presented by Edge Cable Holdings USA, LLC. I trust OPRD will take into serious consideration all objections to installation of a conduit under the beach and

the undersea fiber optic cable. After considering my testimony, I hope you find reason to deny the Ocean Shore Permit Application. Our community, Tierra Del Mar, deserves to remain as unique and unspoiled as it appears today.

Sincerely, Lynda K. Steiner

Beach address: 5625 Jasmine Avenue, Tierra Del Mar

Tigard address: 9165 S.W. Elrose Court, Tigard

Phone – beach – 503-965-6987

Tigard – 503-639-0951

-----Original Message-----

From: PATRICIA G ROGERS <patriciagrogers@mac.com>

Sent: Wednesday, July 29, 2020 10:46 AM

To: HANSEN Ali <Ali.R.Hansen@state.or.us>; HAVEL Chris * OPRD <Chris.Havel@oregon.gov>

Subject: Facebook at Tierra Del Mar

Good Morning,

My husband and I, along with two other couples own the property adjacent to and just south of the Facebook project in Tierra Del Mar. We were led to believe that the project would be completed this year. It was quite a surprise to find out that FB plans to come back January 2021, essentially leaving the lot vacant and cleared for the remainder of the year. Not only did we think the project would be complete by now but also that the promised "landscaping to our wishes" would be in place.

This has always been the wrong project at the wrong place. The residents of Tierra Del Mar have been totally against it from day one. We presented hours and pages of testimony to that effect only to be told that this project is no big deal.

Well, it is a big deal to those of us who are most impacted. We have already sustained damage to concrete at our home brought on by the drilling. To put the equipment in place for this project was a big deal, then they took it all away - tho they left a substantial list of equipment behind. Now they are coming back next year to start all over?

Their time is up. Or it should be. This was an ill fated idea from the get go. It should never have opened the way for pristine beaches in Tillamook County to be used industrially - particularly through a small quiet community. Now to give Facebook an apparently unlimited amount of time to do this project flies in the face of all the boundaries that the county set for them.

We urge the Department of State Lands and the Oregon Parks and Recreation Department to revoke the permits submitted by Edge Cable. Edge Cable has not complied with the permits that were given and continually violate the agreements that were made. And there is no reason to think that they will do otherwise in the future.

End this, please.

Sincerely,
Patricia Rogers

From: EDMUND RUTTLEDGE <ed.ruttledge@comcast.net>

Sent: Monday, July 27, 2020 12:08 PM

To: HANSEN Ali <Ali.R.Hansen@state.or.us>; HAVEL Chris * OPRD <Chris.Havel@oregon.gov>

Cc: REP Gomberg <Rep.DavidGomberg@oregonlegislature.gov>; Sean Malone <seanmalone8@hotmail.com>

Subject: Re: Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Good afternoon:

As I indicated in my message to you last Friday (July 24, 2020), I care to convey some additional thoughts on the latest information regarding the Facebook undersea drilling project at Tierra Del Mar. As you are aware, the tiny residential community of Tierra Del Mar has universally and consistently opposed the permitting of this project by various State agencies and County authorities. Our concerns included what we have asserted to be an inappropriate use of a single residential lot for an industrial level enterprise, potential degradation of the shoreline and potential hazard to the sea bed off our shore as well as the marine environment above the sea bed. We repeatedly apprised the authorities of the project's potential hazards and Facebook's opaque

responses to questions that needed answers. Our concerns and questions were ultimately rejected by our State and County officials and Facebook told us they would be “good neighbors.”

Facebook’s execution of this project has been fraught with broken promises, slipshod construction, compromised health and worker safety practices, and threats designed to control the freedom of movement on the public beach. By example and not by limitation, this has included the following:

- Facebook promised it would haul in its heavy machinery to the drilling site using the north access route provided on Sandlake Road. However, it actually used the south access route exclusively.
- A “sound curtain” structure, a simple two-dimensional construction that had been erected at the south perimeter of the drilling site, blew over. That was, perhaps, an early clue Facebook did not have the requisite expertise to competently/safely complete this project.
- Facebook’s construction crew failed to follow the Governor’s Executive Order for COVID mitigation protocols for construction sites - placing themselves and the community at risk.
- On April 15, 2020, in an attempt to restrict foot traffic west of Facebook’s drilling site, Facebook’s counsel asserted, “... it is a violation of Governor Brown’s order to not use the public beaches for recreational purposes.” Of course, the Governor’s Executive Order said no such thing. This was an arrogant overreach in an attempt to control the freedom of movement of citizens on the public beach.
- On April 28, 2020 Facebook’s project was halted in failure when the drill pipe snapped. As we have since learned, Facebook then constructively abandoned the drill site leaving its industrial trash behind. This included:
 - 1,100 feet of drill pipe
 - a carbide drill tip
 - a “Para Track Gyro Module”
 - a “Para Track Steering Tool”
 - 6,500 gallons of “Bore Gel” drilling fluid

Presumably, this trash has been abandoned in the subsurface of the sea bed off of Tierra Del Mar and we do not yet know if any of it is retrievable, poses potential harm to marine life or the residents of Tierra Del Mar or what Facebook’s plan is for mitigating any potential damage and/or harm.

Facebook has not been a “good neighbor” and, sadly, our State and County officials have been underperformers when it comes to responsibly providing review and oversight of Facebook’s activities. It is noted it took 50 days for Facebook to notify State authorities of the circumstances when the ORPD permit required such notification no less than twelve hours of the potential drilling fluid release. It then took another 37 days for said State authorities to apprise those who have been engaged as interested parties. Facebook’s delay is a violation of the permitting conditions. The additional delay by DSL and ORPD is a violation of trust by these State entities, especially to the people of Tierra Del Mar.

According to *Environmental Justice: Best Practices for Oregon’s Natural Resource Agencies* (2016), “... it is crucial [for State entities] to understand the distribution of health risks associated with ... pollution. Agencies should spatially map the likely pollution migration, along with risk levels, to establish the likely impact area of the permitted activity.” Further you have been directed to “... spatially map the distribution of monitoring activities and enforcement actions, along with consideration of ... relative size of enforcement awards...” Respectfully, your conduct with regard to Facebook’s drilling project at Tierra Del Mar has not even approached, much less met, this

standard. If anything, there is a tincture of inattentiveness and/or even the appearance of cover up which DSL and ORPD need to dispel through an immediate, coordinated and comprehensive pursuit of information and plans from Facebook. It is past time for DSL and ORPD to conduct a thorough investigation, diligently consider of actual facts (as opposed to simply collecting self-serving statements proffered by Facebook) and take effective enforcement action.

When DSL and ORPD permitted this project, it took on the responsibility to safeguard the public lands and its resources, including marine life and fisheries, the value of said resources, sustain the public trust and serve the citizens of Oregon. Do your job.

Ed Rutledge
Tierra Del Mar, Oregon USA

On 07/24/2020 4:22 PM HANSEN Ali <ali.r.hansen@state.or.us> wrote:

Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Edge Cable Holdings, Inc. has notified the Oregon Department of State Lands (DSL) that drilling equipment was left behind during an undersea fiber-optic cable project near Tierra Del Mar.

Project representatives informed DSL that on April 28, 2020, the drill pipe snapped. The pipe was being placed at a depth that ranged from 40 to 69 feet. Subsequently, approximately 1,100 feet of drill pipe; a drill tip; two tools for drill steering and tracking; and approximately 6,500 gallons of drilling fluid were abandoned. *See below for equipment information.*

Edge Cable did not notify DSL of the abandoned equipment until June 17, 2020. The delay in notification eliminated any potential options for recovery of the equipment.

DSL is evaluating options for corrective action as well as the viability of continued work at the site. Initial assessment determined there to be no immediate environmental, health, or safety impacts due to the presence of the equipment. DSL is continuing to assess potential impacts.

Equipment Information

- ~1,100 feet of 5-7/8-inch (outer dimension) drill pipe
- 10-5/8-inch diameter carbide drill tip
- ParaTrack Gyro Module
- ParaTrack Steering Tool
- 6,500 gallons of drilling fluid containing Bore-Gel, Quick-Bore and Pac-LE

Ali Ryan Hansen | Communications Manager

Oregon Department of State Lands

775 Summer St. NE | Salem, OR 97301-1279

503-986-5298 (desk) | 503-510-6860 (cell)

ali.r.hansen@state.or.us

www.oregon.gov/dsl

-----Original Message-----

From: Helen Fisher <fisherenviro@gmail.com>

Sent: Friday, July 24, 2020 10:19 PM

To: HANSEN Ali <Ali.R.Hansen@state.or.us>; HAVEL Chris * OPRD <Chris.Havel@oregon.gov>; Helen Fisher <fisherenviro@gmail.com>

Subject: Edge Cable Holdings, Inc. Fiber-optic Cable Project

Ali, Chris

I am reaching out to you both to voice several concerns that I have relating to the above project off the Oregon coastline.

I am an ex superintendent/mud engineer of the installation sub contractor (Maritech) who conducted the failed works.

Before works commenced, I contacted a number of people connected to the project to highlight that I was no longer involved or employed by Maritech. I was led to believe that Maritech's method statement indicated that I would be present during the drilling operations on this project in the capacity of "Mud Engineer".

I am now informed, that the drill stem broke off before the installation took place. A standard method statement for works of this nature would usually call for API inspection (X-ray or dye pen) of the drill stem and the formal records supplied to the client. Have you or anybody else requested such supporting documentation? I am led to believe that this stem was inspected some time ago but in the interim had been used on another drilling project prior to the Oregon installation. The project was an aggressive rock crossing in the state of Pennsylvania, which would have potentially weakened the drill pipe. I don't have all the data to hand and I maybe incorrect in my assumption. However, I would strongly suggest you request that API testing data.

I would normally offer my services as an expert witness in such cases of failure but I am currently involved in a long term contract in NY. I am more than willing however, to offer you guidance and advice from distance at no charge or cost. I would say it would be highly likely that the method statement has not been followed in this case. Even the machine that was specified by Maritech wasn't the machine that was used. The project was "sub" sub contracted at the 11th hour to Carson Corporation of New Jersey when Maritech could not muster a rig or a certified crew.

In short, if I can help you guys out please feel free to reach out and I will help you as much as I can.

Regards

Mike Fisher

SEEGER Billie * OPRD

From: HAVEL Chris * OPRD
Sent: Friday, July 24, 2020 4:49 PM
To: HAVEL Chris * OPRD
Subject: FW: Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Please see the message below for an update from the Oregon Department of State Lands on the Edge Holdings project to install a underground cable near Tierra del Mar in Tillamook County. The Oregon Parks and Recreation Department is likewise reviewing its options under the conditions of the ocean shore permit it issued to install this cable under the ocean shore.

--

Chris Havel, Oregon Parks and Recreation Dept., (d) 503-986-0722, (c) 503-931-2590, chris.havel@oregon.gov

From: HANSEN Ali <Ali.R.Hansen@state.or.us>
Sent: Friday, July 24, 2020 4:23 PM
Subject: Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Update on Edge Cable Holdings, Inc. Fiber-optic Cable Project

Edge Cable Holdings, Inc. has notified the Oregon Department of State Lands (DSL) that drilling equipment was left behind during an undersea fiber-optic cable project near Tierra Del Mar.

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- ParaTrack Steering Tool
- 6,500 gallons of drilling fluid containing Bore-Gel, Quick-Bore and Pac-LE

Ali Ryan Hansen | [Communications Manager](#)
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Oregon Parks and Recreation Department Oregon Department of State Lands Representative
David Gomberg
Senator Arnie Roblan
Jason Miner, Governor's Office
Mary Faith Bell, Tillamook County Commissioner
Bill Baertlein, Tillamook County Commissioner
David Yamamoto, Tillamook County Commissioner

July 31, 2020

Dear Officials,

We have debated for two days about writing this letter. For almost two years, David and I have written letters, spoke at every level of meeting from the State to County levels and attended almost every hearing discussing the Facebook/Edge industrial drilling project on a residential lot in Tierra Del Mar.

No one appeared to be seriously listening to our concerns or those of our neighbors. And now — especially given that we live in a high-hazard earthquake zone — we try again.

Now, at long last, is the time to listen. The Oregon Coast is a remarkably beautiful area that needs to be protected. The environment needs to be protected; the ocean habitat needs to be protected. And we, the human residents, need to be protected.

Simply put, leaving drilling detritus in the ocean — 1,100 feet of drill pipe, a drill tip, a gyro module, a steering tool and 6,500 gallons of bore gel in the drill prism — is not acceptable. And then, in a classic case of adding insult to injury, no one at the federal, state or county level was notified for nearly two months.

It begs the question: What else haven't they revealed?

Given their behavior, and their engineering bungling, how is it possible that Facebook/Edge be allowed a second "try" near the same drill site? They told us that they would be back January, 2021, to begin again. If they fail yet again, will they get a third try? A fourth?

Please listen, this time, and deny Facebook/Edge Cable further drilling rights. Protect us, our beaches, and ocean marine life.

Sincerely,
David and Candace Churchley
5955 Harris Avenue
(Tierra Del Mar)
Cloverdale, OR 97112
[503-965-5102](tel:503-965-5102)
Cscapecreations@gmail.com

From: Lynnae Ruttledge <lynnae.ruttledge@comcast.net>

Date: July 29, 2020 at 1:08:31 PM PDT

To: HAVEL Chris * OPRD <Chris.Havel@oregon.gov>, bill.ryan@dsl.state.or.us, ali.r.hansen@state.or.us, SENNEWALD OPRD <Jay.Sennewald@oregon.gov>

Subject: **We are better than this ...**

Hello OPRD and DSL: while it's appreciated that you have now informed the Tierra Del Mar community of the egregious behavior by Facebook/Edge Cable, you need to hear loud and clear that simply 'reviewing your options' is not acceptable. Echoing what you are hearing from other TDM neighbors, I call upon you to honor your organizations' missions and demonstrate that you can be better stewards of the public trust: revoke the permits and do it now.

The Tierra Del Mar community and its supporters have been on record for more than a year and half, expressing our concerns and stating our opposition to this project. We have stated over and over again that the industrial nature of the Facebook project was inappropriate for our oceanfront community. We have been forced to endure months of industrial drilling and its concomitant impacts. We learned in early May that the project had failed and that they would be coming back to try again in January. Facebook has been anything but a good neighbor. A do-over is not going to improve their performance.

It was bad enough to learn in early May that a catastrophic failure had occurred and that Facebook planned to return in 2021 and try again. Now we learn from you that "approximately 1,100 feet of drill pipe, a drill tip, two tools for drill steering and tracking and approximately 6,500 gallons of drilling fluid were abandoned." And even more damning - "Edge Cable did not notify DSL of the abandoned equipment until June 17, 2020. The delay in notification eliminates any potential options for recovery of the equipment."

We are better than this. We have a responsibility to protect our natural resources from deleterious actions. We must be better stewards of the public trust. Abandoning and not being able to retrieve significant amounts of drilling equipment under the seabed is egregious beyond comprehension. This shouldn't be acceptable to any anyone, and especially not acceptable to our state agencies.

I call upon you to do the right thing. Revoke the permits and do it now.

Lynnae Ruttledge
5885 Austin Ave.
Tierra Del Mar
(360) 915-2008