

August 26, 2019

Sarah Absher, Director

Tillamook County Dept. of Community Development 1510 –B Third Street  
Tillamook, OR, 97141

Re: File No. 851-19-000105-PLNG

September 5, 2019, Public Hearing Comments

Dear Ms. Absher,

When Governor Kate Brown wrote her letters in 2016 and 2018, to the delegates of the Pacific Telecommunications Conference, she said,

We invite and encourage you to consider the State of Oregon as your future site to come ashore on the west coast of North America, and as an excellent location for the placement of related on-shore operations. Oregon has a long record of successful submarine cable industry projects, a highly developed telecommunications infrastructure, a workforce of skilled professionals for marine and terrestrial telecommunications cable installation, and unparalleled cooperation between its undersea cable operators, fishing industry, and state government.

As chair of the State Land Board, which approves easements for cable landings on the Oregon coast, I can assure you that we will welcome and give full and timely consideration to all landing requests. Please know that the Department of State Lands and the Oregon Business Development Department along with other involved state agencies will work in partnership with you, as an undersea cable operator, and Oregon's fishing fleet to ensure the success of your project once approved.

These comments are pretty wide open in terms of specifics about this cutting edge industry. At face value they look like a positive reinforcement for Oregon's economy - placing the state in a top position to attract a booming industry. But surely, Governor Brown did not mean to offer a carte blanche invitation to make the entire Oregon Coast available to any company engaging in submarine cable business. As Governor of Oregon, she of all people knows how precious the coast of Oregon is to all Oregonians. In a state that prides itself on preserving and caring for our pristine coast and environment, she could not possibly have meant to open our shores to unrestricted or unregulated development by internet providers, could she?

I believe that we are at this hearing because in our rush to be a leader in this commercial endeavor, we have put the cart before the horse. We all have had experiences where technology has come before prudence. Smoking was cool before the health concerns were known. Things get invented and used before knowledge and laws can catch up.

Our issue with Edge Cable LLC/Facebook is an example of this. Oregon does have the reputation of getting submarine cables landed and up and running more quickly than other coastal states. But in every other case - Bandon, Pacific City, Nedonna Beach, the cables make landfall under public property. We think this is as it should be.

Submarine fiber optic cables are private enterprises not public utilities. They are built by companies to enhance their business and profit. As such, they are subject to a myriad of laws and restrictions. It is our argument that these laws and restrictions should also apply to the locations allowed for such enterprise.

Tierra Del Mar is zoned RR-2. It is an unincorporated cluster of homes along a beautiful quiet beach - truly one of many gems along the Oregon Coast. Facebook wants to change that. By manipulating the zoning conditional use allowance, Facebook wants to turn an ocean front home site into a commercial cable landing.

Their argument is that we, the neighbors, will never know they were there upon completion of this project. That doesn't wash. Besides the horrific nature of the duration of the drilling and all of the health and welfare concerns inherent in that, they will install a buried 12'X14'X14' cement bunker to house the necessary equipment. If you are installing something that you never need to come back to why is the bunker large enough for one or two men to work in when necessary?

The very nature of the technology refutes the premise. We all know that internet technology changes so quickly that we are hard pressed to keep up. Today's cutting edge is tomorrow's obsolete. Facebook would have us believe that for 20+ years there will be no changes and no need to maintain, improve, or change this cable? If so I have a bridge I'd like to sell you. And there are other empty home sites in Tierra Del Mar. If this project goes through would it not make sense for Facebook or others to buy those lots and add those locations to their business because they will be near an already established location? If there is no restriction

now to deny the access through Lot 3200, there will be no restriction on other Tierra Del Mar locations or anywhere else on the coast. The dam will be broken.

So my husband and I, co-owners of the home just south of Lot 3200 for almost 30 years, urge you to deny this permit. Submarine fiber optic cable landing sites should be regulated and permitted only through public land - as they already are. To do otherwise is to open Pandora's Box. And though I cannot speak for Governor Brown, I can't help but think that she would agree.

Sincerely,

Thomas and Patricia Rogers