

Hannah Elliott



From: Robin Hayakawa <robin@colw.org>
Sent: Tuesday, November 25, 2025 10:52 AM
To: Katie McDonald
Cc: Hannah Elliott; Plan
Subject: COLW Rebuttal Comments - Settle Appeal
Attachments: 11.25.25_COLW Settle NFD Rebuttal Comments.pdf

Hi Crook County,

Please add the attached rebuttal comments to the record for the Settle NFD Appeal.

I hope you all have a good holiday week. Happy Thanksgiving.

--

Robin Hayakawa
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November 25, 2025

Filed by email: Katie.McDonald@crookcountyor.gov

Crook County Planning Commission
% Katie McDonald, Assistant Planner
320 NE Court Street
Prineville, OR 97754

Re: Application File No. 217-25-000233-PLNG-01; Settle NFD

Dear Crook County Planning Commission:

Central Oregon LandWatch provides the following rebuttal comments in advance of the Planning Commission's November 26 comment deadline. LandWatch thanks the Planning Commission and the Crook County Community Development Department for their work and consideration in hearing our appeal of the Staff Approval (217-25-000233-PLNG-01) of the nonfarm dwelling in the County's EFU-1 zone.

LandWatch continues to have concerns about the size and methodology used by the Applicant in demonstrating compliance with CCC 18.16.040(7) and Wildlife Policy 2. In particular, we believe that the practice of incorporating "effected acreage" or "effected property" is likely contrary to the purpose of Wildlife Policy 2, which limits residential dwelling density in order to protect Crook County's big game habitat, and provides for a 2,000 acre or "one-mile" study area.

Nevertheless, in the interest of compromise, LandWatch would consider the issues raised in our appeal satisfied if the Planning Commission issued an approval based solely on Exhibit F2 - PDDE Study (1-Mile Study Area). See Exhibit 6 at p. 30. Doing so would demonstrate that approval of the NFD would not violate the residential density limitations imposed by Wildlife Policy 2 of the Crook County Plan, while including all development on resource land (including EFU-JA) within a one-mile radius of the subject property.

As a final note, **Exhibit F2** shows that there are 52 address points within the 4,533 total "effected" acres. This equates to a dwelling density of approximately 1 dwelling per 87





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acres. In other words, under any methodology, the area East of the Juniper Acres where the subject property is located has essentially reached the maximum allowable dwelling density (one dwelling per 80 acres) under Wildlife Policy 2. In the interest of protecting valuable big game habitat that is already heavily impacted by development, we recommend that Crook County refrain from authorizing further development in the area.

We look forward to participating in discussions about the protection of Crook County's wildlife in the future. Thank you.

Sincerely,

/s/ Robin Hayakawa

Associate Staff Attorney

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We defend and plan for Central Oregon's livable future