

Hannah Elliott

From: Robin Hayakawa <robin@colw.org>
Sent: Tuesday, July 15, 2025 9:45 AM
To: Plan
Subject: Application File No. 217-25-000233-PLNG - Inadequate Wildlife Density Study

Hi Crook County,

Central Oregon LandWatch is concerned that the above-referenced application fails to meet the approval criteria for a nonfarm dwelling in Crook County's General Deer Winter Range. Specifically, the application appears to conflict with Crook County Comprehensive Plan Wildlife Policy 2, which limits residential density within this range to no more than one dwelling per 80 acres.

We note that the Applicant's Wildlife Density Study improperly excludes dozens of properties zoned Exclusive Farm Use - Juniper Acres (EFU-JA). This exclusion is not justified. Wildlife Policy 2 applies to dwellings within the EFU-1 and EFU-JA zones. See CCC 18.112.051 Wildlife Policy Applicability, which states:

"All new nonfarm dwellings on existing parcels within the deer and elk winter ranges must meet the residential density limitations found in Wildlife Policy 2 of the Crook County Comprehensive Plan."

This is significant because numerous EFU-JA parcels within the Applicant's study area are already developed with dwellings. Below are examples of EFU-JA zoned properties containing dwellings that should have been accounted for in the density study.

1. Map/Taxlot 1816040004000
2. Map/Taxlot 1816040004800
3. Map/Taxlot 1816090000600
4. Map/Taxlot 1816040003300
5. Map/Taxlot 1816040004300

This list is far from exhaustive. Overall, the density of dwellings in proximity to the subject property appears to already exceed the limits set by Wildlife Policy 2. Without an accurate and complete density study that includes all EFU-JA properties within one mile of the subject property, this application should be deemed incomplete or denied.

Thank you for considering these comments. Please notify us of any further decisions, hearings, or opportunities to comment on this application. Our address is:

Central Oregon LandWatch
2843 NW Lolo Dr., Suite 200
Bend, OR 97703

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Robin Hayakawa

Associate Staff Attorney

[Central Oregon LandWatch](#)

2843 NW Lolo Dr. Ste. 200, Bend, OR 97703

541-647-2930 x807 | robin@colw.org

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