

Merrill, Hannah

From: Robert Crittenden
Sent: Friday, March 23, 2012 4:05 PM
To: zSMP
Subject: Comments on draft smp update

Dr. Robert N. Crittenden

[REDACTED] Carlsborg WA 98324
[REDACTED]

Regarding: SMP draft update.

Thank you for allowing the opportunity to submit comments on the draft SMP update. I am submitting a few general ones below:

- Its definition of "agriculture" doesn't appear to include wildcrafting. That is how I use most of one of my properties and intend to continue doing so.
- Likewise, the definition of "agriculture" appears to have a narrow focus limited to such old-fashioned agricultural practices as plowed fields. It doesn't appear to appreciate nor allow some organic or wildcrafting growing practices, many of which have little or no adverse impact on the environment.
- I will reiterate something that I first tried to get established in Jefferson County. That is to narrowly define a loophole in the regulations that would allow the citizens to avoid excessive buffers for farming or gardening activities that involve a strict organic use of the land. I do not mean merely USDA or State Organic standards, as those allow too many egregious practices, but uses that involve the application of no chemicals nor materials, except those that originated within the parcel in question. (*You will probably wish to define that more carefully.*) The intention is to allow the use of compost and green manures that originated within the parcel itself but to prohibit all commercial fertilizers, pesticides, and so on.... including those that are certified "organic."

The concept has two important aspects. First, it encourages and allows a type of organic land-use that can be expected to have little or no adverse impact on ecological functions and values; and Second, by allowing the public an opportunity to avoid regulation, it would not only save the County the expenditure of money, effort and good will but holds the possibility of gaining broad public support for an ethic and life-style that is organic and sustainable. That would be a great step forward.

Enforcement would be by the public complaining about egregious infractions, which, I expect, is how enforcement is often done in many cases, already.

Creating an opportunity to avoid excessive buffers involves a shift in viewpoint: Generally, all regulation expends good will. So, instead of writing ever-more comprehensive regulations, it is better to promote positive and life-affirming activities by exempting them from regulation. --- There is a philosophical tradition behind this. That can be seen in Simone Weihl's statement that, "Evil is someone else making decisions for you." (*Incidentally, that was not originally her idea but was a restatement of one from Friedrich Nietzsche.*) --- Thus, all regulation is evil by its nature and it is repressive. The best regulations are those that are the least that is necessary to accomplish their intended legitimate purpose. And "legitimate" is not to be broadly construed.

- Another general comment is that the required buffers are far in excess of what is necessary to protect the ecological functions and values. Furthermore, not all ecological functions and values are worthy of protection nor have the objectives been adequately defined to allow one to discern whether they are being harmed or not.
- A third general comment is that a lot of this draft ordinance appears to be an illegal tax, because, it places a burden upon one segment of society (shoreline land owners) for things that benefit society in general.