



7373 West Saginaw Highway, Box 30960, Lansing, Michigan 48909-8460
Phone (517) 323-7000

January 22, 2014

Michigan Department of Agriculture & Rural Development
Environmental Stewardship Division
PO Box 30017
Lansing, MI 48909

To whom it may concern,

The following are comments of the Michigan Farm Bureau regarding the annual review of the Generally Accepted and Agricultural Management Practices (GAAMPs) as developed under the authority of the Michigan Right to Farm Act, 1981 PA 93 as amended. We believe Michigan's Right to Farm is the model for our country. The Act has allowed all sectors of Michigan agriculture to move forward utilizing GAAMPs on a voluntary basis while enhancing the environment.

Michigan Farm Bureau appreciates the opportunity to comment on the proposed changes as indicated below.

Manure Management

- MFB agrees with the proposed change to *Field Stockpiling* (under Stacked Solid Manure), to manage manure regarding shaping, rotation, and land application.
- MFB recommends that language under Application of Manure to Land, specifically the listing of recommendations to control odor, a) through e), be printed in regular, not bolded text, as they are recommended practices and not required by the Michigan Department of Agriculture and Rural Development.
- MFB agrees with the proposed change in language under Method of Manure Application describing recommendations to address tile line effluent and listing contacts for the Department of Environmental Quality and the Pollution Emergency Alerting System in case of a manure spill.

Site Selection

- The draft addresses new and expanding livestock farms of less than 50 animal units in areas zoned exclusively for residential use. Farms in these areas would need to comply with local zoning. MFB supports this change for the following reasons:
 - The practice of compliance of local zoning is not new to the Site Selection GAAMP. **Since the inception of the GAAMP, farms above 50 animal units have been required to comply with local zoning.** The proposed change would also require new and expanding livestock farms of less than 50 animal units in residentially exclusive areas to comply with local zoning.
 - When the Site Selection GAAMP was created in 2000, urban agriculture was not a trend; people were moving next to farms, not farms moving into residential areas. Because of that, the GAAMP has historically applied only to new and expanding livestock farms of 50 animal units or above. Today with the rise of urban agriculture, we're faced with the issue of farms moving into residential areas.

- MFB policy supports the development of a set of management practices unique to new and expanding urban agriculture, including provisions for local zoning requirements, livestock care standards, crops and cropping standards, and environmental protection standards.
- Only livestock in residential areas would be affected. This does not forbid livestock, it just allows for local decision-making regarding what kind, how many, and the control of livestock in these areas.

Pesticide Utilization/Pest Control

- MFB has no comment since the 2014 draft contains no significant changes.

Care of Farm Animals

- MFB has no comments since the 2014 draft contains no significant changes.

Farm Market

- MFB has no comments since the 2014 draft contains no changes.

Irrigation Water Use

- MFB has no comments since the 2014 draft contains no significant changes.

Nutrient Utilization

- MFB has no comments since the 2014 draft contains no significant changes.

Thank you for your consideration of these comments. Please call me with any questions.

Regards,

Matthew Kapp

Matthew D. Kapp
Government Relations Specialist
517-679-5338

Wilcox, Rhonda (MDA)

From: Rep. Jeff Irwin <district053@house.mi.gov>
Sent: Wednesday, January 22, 2014 4:50 PM
To: Wilcox, Rhonda (MDA)
Subject: Proposed GAAMPs
Attachments: MDARD_GAAMPs Changes_1-22-14.PDF

Please see attached.

Representative Jeff Irwin
53rd District
State of Michigan

517-373-2577
www.irwin.housedems.com
JeffIrwin@house.mi.gov

Sign up for my free e-newsletter by emailing me at:
JeffIrwin@house.mi.gov



53RD DISTRICT
STATE CAPITOL
P.O. BOX 30014
LANSING, MI 48909-7514
PHONE: (517) 373-2577
FAX: (517) 373-5808
E-MAIL: jeffirwin@house.mi.gov

MICHIGAN HOUSE OF REPRESENTATIVES

JEFF IRWIN
STATE REPRESENTATIVE

Michigan Department of Agriculture and Rural Development
Environmental Stewardship Division
P.O. Box 30017
Lansing, MI 48909

January 22, 2014

Re: Proposed changes to GAAMPs for Site Selection and Pesticide Utilization

I am writing today to share my concerns about proposed changes that may affect my community and many communities around our state. My main concern is regarding the addition of a Category 4 to the Site Selection GAAMPs, which would make it impossible for small scale and urban farmers to meet the requirements.

As you know, state law authorizes MDARD to develop and adopt GAAMPs based on sound science and environmental stewardship. The creation of Category 4, however, does not appear to be based on either scientific evidence or environmental protection, but rather an arbitrary local zoning designation of whether a property is agricultural or residential. In addition, excluding small-scale farmers from these management requirements could lead to a patchwork of local policies that may or may not adhere to best practices that are protective of the environment.

My understanding is that MDARD believes the Michigan Right to Farm Act was not intended to provide statewide protection for small scale and urban farming. While I disagree with such an assessment, I would recommend the Department address this concern through legislative action rather than through the GAAMPs process. Not only would this clarify the intent of the law for future generations, but it would avoid a potential legal battle over what appears to be a policy in direct conflict with state law.

I am also concerned about the removal of language from the pesticide utilization section titled "Protection of the Environment." Specifically, the change suggests removing:

"Applicators need to be aware of, and adhere to, any pesticide use directions or references on pesticide labels concerning state management plans. These plans are specifically developed for the protection of groundwater."

In general, I oppose lowering the threshold for pesticide safety. I am interested in learning more about this particular section, as well as the reasons for its recommended removal.

I appreciate you taking the time to read my concerns and look forward to working with the Department to further discuss these issues.

Sincerely,

Jeff Irwin
State Representative
53rd District



Wilcox, Rhonda (MDA)

From: Frank Mancuso <frank@mancusocameronlaw.com>
Sent: Wednesday, January 22, 2014 11:31 AM
To: Wilcox, Rhonda (MDA)
Cc: Kelly VanMarter; Mike Archinal; Gary McCririe
Subject: Public Comments on Site Selection and Odor Control GAAMPs

I represent Genoa Charter Township and have had a couple of cases involving the Michigan Right to Farm Act and specifically, the Site Selection and Odor Control for New and Expanding Livestock Production Facilities GAAMPs (the "Site Selection GAAMPs"). I have reviewed the proposed changes for the 2014 Site Selection GAAMPs with the Township's Assistant Manager and was pleased with the changes. Genoa Township is located in Livingston County between Brighton and Howell. Genoa Township has a population of approximately 20,000 with some dense residential areas, commercial and industrial areas and yet quite a bit of agricultural property. In the recent past there have been a couple of cases of persons operating what I will refer to as hobby farms in residential areas (in one case, the hobby farm was on a 1/3 acre lot in a platted subdivision). I believe that the proposed changes will address the problems that Genoa has experienced with the hobby farms in residential neighborhoods.

There was one additional concern expressed to me, however. That is what about New and Expanding Livestock Facilities (as it is defined in the proposed 2014 Site Selection GAAMPs) in commercial zoning districts? For example, if a property owner decided to place a new Livestock Facility on Grand River Avenue in a commercial zoning district (next to shopping centers, office buildings, restaurants, etc). Fortunately, we have not yet had to deal with this situation but, it is a possibility in Genoa Township (as I'm sure that this is possible in many other communities as well). The feedback that I received is that we would like to see restrictions on New and Expanding Livestock Facilities in commercial zoning districts similar to the restrictions (as proposed) in residential zoning districts.

Thank you,

Frank J. Mancuso, Jr.
Mancuso & Cameron, P.C.
722 E. Grand River Ave.
Brighton, MI 48116
Ph: (810) 225-3300
Fax: (810) 225-9110

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Wilcox, Rhonda (MDA)

From: Rep. Joel Johnson <district097@house.mi.gov>
Sent: Wednesday, January 22, 2014 3:47 PM
To: Wilcox, Rhonda (MDA)
Subject: Public Comment on Agricultural Management Practices

Hello Rhonda –

I wish to express my concern with changes which are being considered in relation to small farms. Our residents should be reassured that they will not be prevented from engaging in agricultural practices even in proximity to residential areas.

The example which has been cited about 4,999 chickens on a 50 by 75 plot by Division Director Johnson is hardly helpful given the improbability of such a scenario.

Perhaps a review of “livestock units” to better clarify the needs for small farms would be more appropriate. Surely there is a middle road here that would protect the ability of property owners to engage in agricultural activities without leaving their fate to be decided based entirely upon where they happen to live.

If you go back far enough in history in most communities (suburban communities in particular) you will likely find the name of a farmer on the deed. Let’s keep agriculture a central part of our land use and landscape.

I thank you for your consideration.

Joel Johnson
State Representative
97th District

Wilcox, Rhonda (MDA)

From: Erica Eklov <eklove@portagemi.gov>
Sent: Wednesday, January 22, 2014 12:17 PM
To: Wilcox, Rhonda (MDA)
Cc: Maurice Evans; Victoria Georgeau
Subject: 2014 GAAMPs Draft Revisions - City of Portage Comments
Attachments: 2014 01-22 MSE-Wilcox -- GAAMPs 2014 Draft Revisions Comments.pdf

Good Afternoon, Ms. Wilcox.

Attached to this message you will find the City of Portage response to the 2014 draft revisions to Generally Accepted Agricultural Management Practices (GAAMPs) for Site Selection and Odor Control for New and Expanding Livestock Production Facilities.

It would be greatly appreciated if you could please confirm receipt of this message.

Sincerely,

Erica Eklov

Erica L. Eklov

Administrative Assistant
Office of the City Manager
City of Portage
7900 South Westnedge Avenue
Portage MI 49002
269.329.4400

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Office of the City Manager

January 22, 2014

Rhonda Wilcox
Michigan Department of Agriculture
Environmental Stewardship Division
P.O. Box 30017
Lansing, MI 48909

RE: Generally Accepted Agricultural Management Practices for Site Selection and Odor Control for New and Expanding Livestock Production Facilities – 2014 draft revisions

Dear Ms. Wilcox,

I am writing in response to the 2014 draft revisions to Generally Accepted Agricultural Management Practices (GAAMPs) for Site Selection and Odor Control for New and Expanding Livestock Production Facilities. On Monday, January 20th, the City of Portage became aware of the draft revisions to the GAAMPs and it is understood that public comments regarding this matter are being accepted until 5:00 p.m. on January 22, 2014.

Please note that the City of Portage has an interest in the proposed revisions and the potential impact on local zoning regulations, and in particular, whether the proposed GAAMPs for a livestock facility will impact or necessitate a change to the city's zoning map and/or text. In particular, in 2011 the city adopted the attached ordinance that permits Keeping of Chickens on residential properties as an accessory use, provided there is compliance with the zoning regulations and a permit is obtained.

On behalf of the City of Portage, I am requesting that the Department of Agriculture accept this communication as preliminary input on this matter. It is understood that a public meeting will also be held on February 12th to further consider the proposed revisions, and the city intends to provide additional comments on this matter by the date of the next scheduled meeting.

Thank you for your consideration. Please feel free to contact me at 269-329-4400 should you have any questions or comments.

Sincerely,

Maurice S. Evans
City Manager

Attachment: City of Portage Zoning Code, Keeping of Chickens regulations

Sec. 42-121. - Accessory uses.**A. General requirements.**

1. Except as otherwise noted in this section, accessory structures, buildings and uses shall be subject to all of the regulations of this article applicable to main buildings, structures and uses.
2. No detached accessory building or structure shall be located closer than ten feet to a main building or other accessory building or structure on the same lot.
3. Except as noted in (4), below, accessory buildings, structures and uses shall be located in the same zone and on the same zoning lot as the main building and/or principal use.
4. Accessory buildings, structures and uses shall be located in the same zone and on the same zoning lot as the main building and/or principal use except on property zoned P-1, vehicular parking or if the use is in the nature of a private utility, such as a private water supply or water impoundment area (but not including parking or access drives). These exceptions shall be subject to the review and approval of the planning commission and shall be specifically subject to site plan review. In addition, the developer shall provide the commission with impacts statements and information that the commission deems necessary to review potential adverse impacts on surrounding properties. The commission may attach requirements to such accessory buildings, structures and uses which it deems necessary to avoid or mitigate adverse impacts on surrounding properties.

B. Accessory buildings—Residential zoning districts.

1. Non-lakefront lots: The following applies to accessory buildings and uses on non-lakefront lots in the R-1A one-family residential, R-1B one-family residential, R-1C one-family residential, R-1D one-family residential, R-1E estate residential, or R-1T attached residential districts. These requirements shall also apply to one family dwellings constructed in the RM-1 and RM-2 districts.
 - a. No detached accessory building shall exceed 14 feet in height.
 - b. Maximum floor areas:
 - (1) Except as noted in (2) through (4) below, each detached accessory building shall have a maximum floor area not greater than 20 percent of a required rear yard. Accessory buildings on these lots may be located within a required rear yard, but not closer than three feet to any side or rear lot line.
 - (2) On nonconforming residential lots, the maximum floor area of all detached accessory buildings shall not exceed 20 percent of the total rear yard area. Accessory buildings on these lots may be located within a required rear yard, but not closer than three feet to any side or rear lot line.
 - (3) The total floor area of all accessory buildings, including those attached to the main building, shall not exceed the ground floor area of the main building, provided that breezeways or enclosed porches are not counted in computing the floor area of an accessory or main building.
 - (4) The floor area of accessory buildings may exceed the ground floor area of the main building when the residential lot or parcel is unplatted with an area of two acres or more. However, when the floor area of the accessory building exceeds the ground floor area of the main building, the accessory building and use shall be subject to the approval of the planning commission. To ensure harmonious relationships and to minimize conflicts between adjacent uses, the commission shall consider the proposed characteristics and uses of the building in relation to existing land uses and to the future land uses as shown in the comprehensive plan. The commission may attach requirements to such accessory building and

use when it deems necessary to avoid or mitigate adverse impacts on surrounding properties. This section does not apply to agricultural uses.

2. Lakefront lots: The following applies to accessory buildings on lakefront lots in any residential district.
 - a. Not more than one detached accessory building is permitted in the rear (lake side) yard.
 - b. The permitted accessory building shall not exceed 80 square feet in area and eight feet in height, measured from the average grade at the accessory building location to the highest point of the accessory building.
 - c. The permitted accessory building shall be located not closer than ten feet to any side property line and three feet to the rear property line in the rear (lake side) yard.
 - d. Boathouses, docks and similar structures that are situated in the water are not regulated by this section.
 - e. All buildings and structures, including fences, that were in existence in the rear (lake side) yard prior to January 30, 1987, shall be allowed to continue and shall be considered to be nonconforming structures and buildings.
 3. RM-1 and RM-2 districts: A detached accessory building accessory to uses permitted in these districts may be located within a required rear yard not closer than three feet to any side or rear lot line, except that community recreation or meeting facilities shall meet the setback requirements applicable to main buildings for the district. One-family dwellings shall comply with the provisions of section 42-121.B.1.
- C. *Accessory uses.*
1. Accessory uses may include, but are not necessarily limited to, the following:
 - a. Residential accommodations for servants and caretakers within the principal dwelling and not as a separate household.
 - b. A swimming pool for the use of the occupants of a residence or their guests.
 - c. Storage of merchandise normally carried in stock or goods used in or produced by industrial uses in connection with a business or industrial use, unless such storage is excluded in the applicable district regulations.
 - d. Off-street parking, open or enclosed, and loading subject to the provisions of division 6, subdivision 1, Off-street parking and loading of this chapter.
 - e. Signs, subject to the provisions of division 6, subdivision 2, signs, of this chapter.
 - f. Home occupations, subject to the provisions of section 42-129, home occupations.
 - g. Accessory antennas, subject to the provisions of section 42-131, accessory antennas.
 - h. Private stables, if all of the following are satisfied:
 - (1) The private stable is being used for the enjoyment of the persons occupying the premises.
 - (2) The private stable is outside of the boundaries of platted land.
 - (3) Two acres of land are provided for the first horse and one additional acre of land is provided for each additional horse. The zoning board of appeals may reduce the area requirements when it is affirmatively shown that the reduction will not interfere with the rights of neighboring landowners to the enjoyment of their premises.
 - (4) Stables, feeding areas and other confinement areas are located at least 125 feet from neighboring residences.
 - (5) Manure from stables is located at least 125 feet from any property boundary line.

- (6) No electrical fencing exceeding 12 volts is used on the premises.
 - (7) The stables, feeding areas and other confinement and/or manure storage areas do not produce noise, odor, dust, fumes or comparable nuisances.
 - i. A residential dwelling unit subject to the provisions of section 42-137, work/live accommodations.
- D. *Keeping of chickens as an accessory use.*
 1. *Definitions.* All definitions, unless otherwise specifically stated shall, for the purposes of this section, have the meaning as follows:
 - a. *Animal, domestic.* Any animal normally and customarily kept for pleasure and companionship, that has adapted to human interaction, typically resides within a dwelling and is commonly considered to be domesticated. This category includes those animals typically kept as household pets exclusively by the person(s) occupying the premises. Examples include a dog, cat, rabbit, small domesticated rodent such as hamster, gerbil, ferret and chinchilla, guinea pig, caged bird, non-venomous reptile, amphibian and common aquarium fish, excluding however, exotic animals, farm animals (whether kept for commercial profit or for pleasure and companionship) and animal *ferae naturae*.
 - b. *Animal, farm or livestock.* Any animal that is commonly raised or kept in an agricultural setting, for commercial profit and primarily utilized for the production of food or fiber products. This category includes those animals typically referred to as livestock but not including a domestic animal. Examples include cattle, sheep, goats, pigs, donkeys, mules, poultry and other fowl.
 - c. *Animal, exotic.* Any animal that may be dangerous or vicious or that is not customarily kept, confined or cultivated by humans as a domestic animal, or farm animal, but may be used for display with appropriate permits. Examples include marsupials such as kangaroos and opossums, non-human primates such as a monkeys and gorillas, canines and felines (not including domestic dogs and cats), poisonous reptiles and amphibians, and the like.
 2. *Household pets.* Domestic animals that are normally and customarily kept for pleasure and companionship as household pets as defined in section 42-121(D)(1)(a) and do not conflict with or violate any other law or regulation of the state, county or city applicable to the keeping of such animal is permitted as accessory to a residential use.
 3. *Chickens (hens).* The purpose of this section is to provide standards and requirements for the keeping of chickens. Roosters are not permitted. It is intended to enable residents to keep up to six chickens on a non-commercial basis while limiting and mitigating any potential adverse impacts on surrounding properties and neighborhood. The keeping of up to six chickens that are utilized exclusively by the person(s) occupying a one-family dwelling as a locally grown food source for the consumption of eggs or meat, is permitted as accessory to the residential use if all of the following are satisfied:
 - a. Chickens shall be kept only in the rear yard secured within a coop and attached pen during non-daylight hours. During daylight hours, chickens may be allowed to roam outside of the coop and pen, if supervised, and only within an area completely enclosed by a fence with a minimum height of four feet.
 - b. The accessory use, coop and pen shall be designed to provide safe and healthy living conditions for chickens while minimizing adverse impacts on other residents and the neighborhood. The coop and pen shall meet the following additional requirements:
 - (1) The coop and pen shall be setback a minimum of ten feet from all property lines of adjacent property and be located a minimum of 30 feet from the nearest wall

- of any adjacent dwelling. Additionally, a coop and pen located on a lake front lot shall have a 40-foot rear yard setback. Public streets and public easements shall not be considered adjacent property lines for purposes of this section.
- (2) The coop and pen shall be a maximum of six feet in height and shall not exceed a total of 80 square feet.
 - (3) The use of corrugated metal/fiberglass, sheet metal, plastic tarps, scrap lumber or similar materials is prohibited. The coop and pen must be completely enclosed with a top and/or cover.
 - (4) The coop and pen may be movable only if the dimensional/setback restrictions contained in this section are satisfied.
- c. All feed and other items associated with the keeping of chickens that are likely to attract or to become infested with or infected by rats, mice or other rodents shall be protected so as to prevent rats, mice or other rodents from gaining access or coming into contact with them.
 - d. The outdoor slaughter of chickens is prohibited.
 - e. The accessory use shall comply with all provisions of the City of Portage Code of Ordinances pertaining to noise, odors, dust, fumes, sanitation and health or other comparable nuisances to ensure the public health, safety and welfare.
 - f. No person shall keep chickens without first securing a permit from the city on a form provided and without paying a permit fee as prescribed by the Portage City Council by resolution. The permit shall be issued by the director. Such permit may be revoked by the director if it is determined that any provision of this section is violated.
 - g. Establishment of an accessory use and/or accessory building under this section shall not confer a vested right in the provisions contained herein or a right to continue such use. Further, a permit granted under this section is personal to the applicant occupying the dwelling and is not transferable.
 - h. This section shall not regulate the keeping of chickens in those areas where a form of agriculture is a permitted principal use or special land use under other sections of this zoning code.
 - i. All licensing required by the State of Michigan and Kalamazoo County, as well as all other statutes, ordinances and codes, shall be satisfied.
 - j. No permit shall be issued by the director without the written authorization from an owner of the property (if different from the applicant) consenting to the application on a form provided. Once authorization is obtained it shall continue for as long as the applicant is in possession of the property.

(Ord. No 03-01 (Exh. A, § 42-301), 2-18-2003; Ord. No 01-06, 2-14-2006; Ord. No 11-07, 4-12-2011; Ord. No 11-13, 8-23-2011)

Wilcox, Rhonda (MDA)

From: Underwood <KathrynL@detroitmi.gov>
Sent: Wednesday, January 22, 2014 4:48 PM
To: Wilcox, Rhonda (MDA)
Cc: Marcell Todd; mrorybolger@gmail.com; Harlow, Rich (MDA); Johnson, James (MDA); Patrick, Bridget (MDA)
Subject: Comments on Site Selection GAAMP
Attachments: comments_to_MDARD_siteselectionGAAMP.doc

Attached please find our comments on the changes to the Site Selection and Odor Control for New and Expanding Livestock Production Facilities GAAMP.

Kathryn Lynch Underwood, City Planner
City Planning Commission/
City Council
Legislative Policy Division
Coleman A Young Municipal Center
2 Woodward Avenue, Suite 208
Detroit, MI 48226-3475
Phone: 313.224.6378
Fax: 313.224.4336
KathrynL@detroitmi.gov

Comments on the proposed changes to the Site Selection and Odor Control for New and Expanding Livestock Production Facilities GAAMP, submitted by Legislative Policy Division/City Planning Commission staff of the Detroit City Council.

1. We note that the proposed Site Selection GAAMP does not/will not apply to Detroit and other cities that meet the criteria of the administrative exemption. Currently, Detroit is in discussion with various community and other stakeholders and farm animal experts to devise the appropriate provisions and standards to allow for certain livestock. We urge that the final wording of this GAAMP will be determined in conjunction with stakeholders in those communities in which the GAAMP will apply.
2. We agree that livestock production facilities—meaning the presence of 50 slaughter and feeder cattle, 35 mature dairy cattle, 125 swine, 500 sheep and lambs, 25 horses, 2,750 turkeys, and/or 5,000 laying hens or broilers—should be prohibited in areas where local zoning prohibits all uses other than residential uses.
3. Detroit—and we suspect many other communities—has no zoning district classification that permits only residential uses and prohibits all other uses. Even in an R-1 (Single-family residential) district, non-residential uses such as schools, religious institutions, neighborhood centers, cemeteries, parks/playgrounds, certain public utility facilities, certain parking lots are permitted as conditional uses; family day care homes and urban gardens are permitted as by-right uses. As drafted, the provision would seem to fail to reach many or most typical urban communities.
4. A large grey area remains, that being the appropriateness of Livestock Facilities, and the applicability/non-applicability of the proposed livestock siting GAAMP, in areas that are predominantly residential but where agriculture uses (including certain livestock) are permitted by local zoning ordinance.
5. We recommend the Michigan Commission of Agriculture consider the following alternate language for Page 12:

Category 4 Sites: Sites not acceptable for New and Expanding Livestock Facilities and Livestock Production Facilities; sites generally not acceptable for New and Expanding Livestock Facilities.

Category 4 Sites are sites that are exclusively zoned for residential use and are not acceptable locations for livestock production facilities regardless of number. Confining livestock with a capacity of 50 animal units or greater in these locations does not conform to the Siting GAAMP.

Category 4 Sites are also sites that are predominantly zoned for residential use and are generally not acceptable locations for livestock

facilities except where the local zoning ordinance permits the confinement of livestock in such predominantly residential areas.

Feel free to contact us should you have any questions or concerns.

Kathryn Lynch Underwood, City Planner
Legislative Policy Division/City Planning Commission
Detroit City Council
KathrynL@detroitmi.gov
313-224-6378

Wilcox, Rhonda (MDA)

From: Randy Zeiliner <rzeilinger@wideopenwest.com>
Sent: Wednesday, January 22, 2014 4:45 PM
To: Wilcox, Rhonda (MDA)
Cc: rzeilinger@wideopenwest.com
Subject: Public Comment (2014 GAAMPs)

January 22, 2014

To: MDARD Director Jamie Clover Adams

RE: PUBLIC COMMENT FOR PROPOSED GAAMP CHANGES (22-Jan-14)

There was a very good turnout of Michigan citizen farmers who took time to address the issues presented by the proposed changes to the 2014 GAAMPs. Many people delivered heart-felt and reasoned presentations as to why these proposed changes are flawed policy and should be rejected. There were also several people in the audience who had specific questions but were unable to ask them because there were no committee task force members to engage in dialog with.

Even more distressing was the fact that not a single Agriculture Commissioner was present at this public meeting. But after attending the commissioner's meeting on 14-January-2014, it is my understanding that the appointed commissioners are simply too busy with their own agendas to attend meetings. I can almost forgive their noticeable absence.

A public meeting of this importance should have had highly positioned MDARD representation, say the Director or Assistant Director. Certainly the chairs of the affected GAAMP committee task forces. The noticeable absence of policy people was picked up by the media who were present and the citizens at large. It is apparent that MDARD has little regard for small scale agriculture operations and is actively working towards the elimination of any farm operation.

The disdain, disrespect and open bias of MDARD and its employees has become obvious as MDARD openly favours large-scale, corporate farming and is actively working to marginalize all other farm activities.

Perhaps it is time to reword the MDARD mission statement:

*"Assure the food safety, agricultural, environmental, and economic interests of the **people of the State of Michigan** are met through service, partnership, and collaboration."* (Emphasis mine)

It is obvious that legal farming is a business reserved for the select few and that MDARD supports denying rights to a majority of farming citizens who actually care about our animals, crops and our environment. How sad for our citizens and our children.

Respectfully,


Randy Zeilinger

Owner Genius Loci Farms, LLC (MAEAP Verified)

Wilcox, Rhonda (MDA)

From: Wanda Bloomquist <bloomquistw@williamstowntownship.com>
Sent: Wednesday, January 22, 2014 3:12 PM
To: Wilcox, Rhonda (MDA)
Subject: 2014 drafts of the state's Generally Accepted Agricultural and Management Practices (GAAMPs).
Attachments: GAAMPS PC letter 012214.pdf

I have attached comments on behalf of the Williamstown Township Planning Commission regarding the draft GAAMPs.
Thank You.

*Wanda Bloomquist
Planning Assistant
Williamstown Twp.
517-655-3193 x307
517-655-3971 fax*



WILLIAMSTOWN TOWNSHIP

4990 ZIMMER ROAD

WILLIAMSTON MI 48895

PHONE: 517-655-3193 FAX: 517-655-3971

January 22, 2014

Michigan Department of Agriculture and Rural Development
Environmental Stewardship Division
P. O. Box 30017
Lansing, MI 48909

Subject: Amendments to the GAAMPs

Dear Division Members:

The Williamstown Township Planning Commission supports the amendments adding Category 4 to the GAAMPs for Site Selection and Odor Control for New and Expanding Livestock Facilities.

The addition of this category will give residents in our residentially-zoned districts protection from undesirable impacts from small farm-like operations. Our intention is not to exclude these operations from the community. However, our residents have expressed the desire to permit development in the Township with all of the rights and protections provided by the zoning ordinance and master plan, regardless of the use.

Williamstown Township is proud of its longstanding support of agriculture, most notably through farmland preservation provisions in the zoning ordinance, and also through participation in the Ingham County Farmland and Open Space Preservation program. In fact, most of the land in the Township remains zoned for agriculture use. The proposed amendments to the GAAMPs would allow us to continue our support of agriculture while maintaining the integrity of our residential areas.

Thank you for considering our voice as a representation of the community.

Sincerely,

Dali Giese
Planning Commission Chair
Williamstown Township

Wilcox, Rhonda (MDA)

From: Michelle Halley <michelle.halley@sbcglobal.net>
Sent: Tuesday, January 21, 2014 4:52 PM
To: MDA-Ag-Commission; Wilcox, Rhonda (MDA)
Subject: 2014 GAAMP changes-comments
Attachments: 2014 GAAMP commx.docx

Please find my comments on proposed changes to the Site Selection GAAMPs attached.
Thank you, Michelle Halley

F. Michelle Halley
Attorney
375 N. McClellan Avenue
Marquette, MI 49855
michelle.halley@sbcglobal.net
906-361-0520

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F. Michelle Halley
Attorney
375 N. McClellan Avenue
Marquette, MI 49855
906-361-0520
michelle.halley@sbcglobal.net

January 21, 2014

Michigan Commission
of Agriculture & Rural Development
P.O. Box 30017
Lansing, MI 48909

And via electronic mail: mda-ag-commission@michigan.gov and WilcoxR2@michigan.gov

Dear Members of the Michigan Commission of Agriculture & Rural Development:

I am writing on behalf of Michigan farmers who are acutely concerned about two proposed changes in the 2014 Draft Site Selection & Manure Management Generally Accepted Agricultural Management Practices (“Site Selection GAAMP”). These two changes would undermine the Michigan Right to Farm Act’s protection for farmers.

As a small farmer myself and an attorney who represents small farmers, including those who can continue to farm thanks only to the Right To Farm Act, I assure you that small farms are critical to the financial and physical vitality of communities across Michigan. Small farmers form a vibrant portion of the overall community giving hands-on farming classes, providing goods to consumers and fueling lively farmers’ markets. Small farms are bastions of teaching the next generation how to farm. The Right to Farm Act is lauded nationally as an act to emulate for the encouragement and success of farming. Farmers need you to protect its integrity.

First, we oppose the adoption of language extending the reach of the Site Selection GAAMP to farms with even less than one animal unit:

Livestock Facility – Any facility where farm animals as defined in the Right to Farm Act are confined regardless of the number of animals. Sites such as loafing areas, confinement areas, or feedlots which have any number of livestock that preclude a predominance of desirable forage species are considered a part of a livestock facility.

2014 Draft Site Selection GAAMP, definitions. The addition of this definition would make the Site Selection GAAMP requirements applicable to the smallest of farms. Even a home with one chicken would be required to meet the setbacks of this GAAMP. This change would likely abolish any keeping of livestock, even flocks of less than a dozen chickens or one bee hive, in most urban settings because the setbacks would be difficult or impossible to meet there. We believe that this is unnecessary over-regulation that could be avoided by leaving the definition of “livestock production facility” just as it is, or at a minimum, making it applicable at a reasonable number of animal units.

Second, we oppose the changes throughout the Site Selection GAAMP that ban all keeping of animals in residential areas:

Category 4 Sites: Sites not acceptable for New and Expanding Livestock Facilities and Livestock Production Facilities.

Category 4 Sites are sites that are exclusively zoned for residential use and are not acceptable locations for livestock facilities regardless of number. Confining livestock in these locations does not conform to the Siting GAAMP.

2014 Draft Site Section GAAMP, p. 12. This change would subject every newly regulated “Livestock Facility” (again, just one animal would qualify) to local zoning restrictions. This change would preclude kids across the state from having even one animal for the county fair. Surely this is not your intent, but it would just as surely be a result.

This change gives the power to control where farming can and cannot occur to each city, township or village. This change is in direct conflict with the plain language of the Right to Farm Act:

Beginning June 1, 2000, except as otherwise provided in this section, it is the express legislative intent that this act preempt any local ordinance, regulation, or resolution that purports to extend or revise in any manner the provisions of this act or generally accepted agricultural and management practices developed under this act. Except as otherwise provided in this section, a local unit of government shall not enact, maintain or enforce an ordinance, regulation or resolution that conflicts in any manner with this act or generally accepted agricultural and management practices developed under this act.

MCL 286.474(6)(emphasis provided). The legislative intent of this amendment to the Right to Farm Act is obvious: the legislature intended that local zoning schemes *not* be able to dictate where or how farming could occur. In 1999, the Senate Agricultural Task Force recommended strengthening the Right to Farm Act in order to alleviate the impacts to farmers trying to comply with different zoning requirements all over the state. The report states regarding the state of affairs then, which is exactly what this proposed change would again create, that:

...The current situation of local control creates havoc. Under the current policy regime, 1,800 units of government determine land use policies and regulations. This is a prescription for confusion and frustration on the part of farmers, particularly those who have farmland in more than one unit of government. In order for agriculture to be successful, regulations concerning farming practices have to be consistent on a statewide basis.

1999 Report by the Senate Agricultural Preservation Task Force, p. 32. Returning to this state of affairs would be an immense step backward for agriculture of all sorts everywhere in Michigan. And, it is in direct conflict with the legislative intent and plain language of Michigan's Right to Farm Act.

In its first look at the RTFA, the Michigan Court of Appeals addressed the basis of the law:

The primary rule of statutory interpretation is to ascertain and give effect to the legislative intent. *Farrell v Auto Club of Michigan*, 148 Mich App 165, 169; 383 NW2d 623 (1986). The language of the statute is the best source for ascertaining this intent. *Great Lakes Steel Division of National Steel Corp v Public Service Comm*, 143 Mich App 761; 373 NW2d 212 (1985), lv den 424 Mich 854 (1985). From the language chosen by the act's drafters, we ascertain that the Legislature was concerned with the regulation of land use and its impact upon farming operations. This concern was directed towards regulations imposed upon farms by local government sources as well as private sources. MCL 286.474; MSA 12.122(4). The Legislature undoubtedly realized that, as residential and commercial development expands outward from our state's urban centers and into our agricultural communities, farming operations are often threatened by local zoning ordinances and irate neighbors. It, therefore, enacted the Right to Farm Act to protect farmers from the threat of extinction caused by nuisance suits arising out of alleged violations of local zoning ordinances and other local land use regulations as well as from the threat of private nuisance suits.

Northville v. Coyne, 429 NW. 2d 185,187; 170 Mich. App. 446, 448 (1988) (emphasis provided).

The Court's interpretation leaves little room for doubt regarding the legislative intent of the RTFA and its proper interpretation. Even so, this interpretation was rendered prior to the 1999 amendment that mandated that the RTFA not be over-ridden by local ordinances.

To the extent that the Site Selection and Odor Control of New and Expanding Livestock Facilities GAAMPs changes purport to require compliance with local zoning, that portion of the GAAMP would be in direct conflict with the RTFA's specific and deliberate language to the contrary, MCL 286.474(6), and would be invalid.

Please contact me at (906) 361-0520 with any questions you may have about these comments.

Sincerely,

F. Michelle Halley (P62637)

c: Farm to Consumer Legal Defense Fund
Michigan Small Farmer Council

Wilcox, Rhonda (MDA)

From: DAM <deborahmulcahey@sbcglobal.net>
Sent: Wednesday, January 22, 2014 4:49 PM
To: Wilcox, Rhonda (MDA)
Subject: Generally Accepted Agricultural and Management Practices (GAAMPs).

22 Jan 2014

I am not in a position to comment on all the GAAMP's. I just learned of this opportunity to provide public comment on this issue a few minutes ago. My husband & I have repeatedly testified during 2013, before the Chocolay Township, MI planning commission & board of trustees, about our objection to farming within our residential community.

My husband grew up on a family farm 15 miles from our home. As he has repeatedly testified, if he wanted to live on a farm we'd live on the family farm that is for sale. But no, we chose to live in a residential area. The majority of the homes in our residential area are dependant on well water. We also happen to live along the shores of Lake Superior. Our drinking water & Lake Superior are resources that we would like to protect & the housing of farm animals in our residential area has an ability to negatively impact our water quality. The environmental reasons to keep farm animals out of a residential area are numerous. In some situations the concept of living adjacent to farm animals might not cause a concern; however, the reality is that living in a residential area, whether a lot 60 x 150 or a lot 100 x 600, is not harmonious with living adjacent to farm animals.

Historically I had some involvement as a State of Michigan employee when the Right to farm act was created. It has been appropriately stated, that the act was to protect the farming community from the urban desires of those who moved into a or adjacent to a farming community. The reverse was not intended. I had never heard any discussions when the Act was being created that the intent was to allow the farming community to take their rights to farm into the non farming areas. Please close what the Dept of Ag considers a loop hole to prevent farming in residential communities.

I also do not think that it is prudent for the proposed language changes to allow local units of government to make the decisions as to whether farm animals should be allowed in non agriculture lands. From a zoning & planning perspective, as well as property value implications I support the Dept of Ag proposed restriction of only allowing farming within areas that zoned agricultural. I would prefer to see the Act changed so that this restriction is on a state wide basis, & not left up to the local units of government to decide this issue.

Deborah Mulcahey

Wilcox, Rhonda (MDA)

From: Mickey Martin <martinm@williamstowntownship.com>
Sent: Tuesday, January 21, 2014 3:47 PM
To: Wilcox, Rhonda (MDA)
Subject: GAAMPS
Attachments: site selection ltr 1-22-14.docx

Please find my letter attached regarding the proposed changes in the GAAMPS regulations.

--

Mickey S. Martin, Supervisor
Williamstown Township
4990 N Zimmer Rd
Williamston, MI 48895
Ph: 517 655 3193
Fax: 517 655 3971



WILLIAMSTOWN TOWNSHIP

4990 ZIMMER ROAD
WILLIAMSTON MI 48895
PHONE: 517-655-3193

1/21/2014

MDARD
Environmental Stewardship Division
PO Box 30017
Lansing, MI 48909

Dear Members:

I am writing in support of the proposed changes in the GAAMP's for Site Selection and Odor Control for New and Expanding Livestock Facilities.

Williamstown Township is a zoned community. More specifically, the Township has sixteen zones in total to accommodate many land uses. Zoning is valued for the quality of life and protection of living choices it affords residents by defining uses. For example, zones can define land as strictly residential, commercial agriculture, industrial or mobile home park zones allowing residents to choose how near or far they want to live from an industrial site, convenience store, gas station, farm animal, etc.. Zoning protects property values by keeping incompatible or unsuitable uses away from your property. Our township uses zoning to guide growth and development in harmony with current and future land use and to protect health, safety and home values.

Williamstown Township promotes and supports agriculture in areas zoned for agriculture. We also promote and support areas devoted to residential uses. Many of our residents do not support having farm animals located in the areas zoned strictly residential. For this reason we support the proposed changes in the site selection to allow areas to be zoned and not allow any farm animals in that zone.

Thank you for your time in working through the proposed changes and reviewing all of the input you will be receiving.

Sincerely,

Mickey S. Martin, Supervisor
Williamstown Township

Wilcox, Rhonda (MDA)

From: Richard Smith <rsmith@cuppad.org>
Sent: Wednesday, January 22, 2014 1:55 PM
To: Wilcox, Rhonda (MDA)
Cc: Catherine Kaufman
Subject: GAAMPs for Site Selection and Odor Control
Attachments: GAAMPs Comment RE Sm Livestock Facilities_ROS.pdf

Dear Ms. Wilcox,

Attached you will find my comments for consideration. I am available to discuss these further, should there be any reason to do so (906) 786-9234. Thank you.

Sincerely,

Richard O. Smith, Community Planner
CUPPAD

--
Richard O. Smith



Central Upper Peninsula Planning And Development Regional Commission

2415 14th Avenue South • Escanaba, MI 49829
906.786.9234 • Fax: 906.786.4442 • 800.562.9828 • cuppad@cuppad.org

January 22, 2014

Richard O. Smith
Community Planner
CUPPAD
2415 14th Ave. South
Escanaba, MI 49829

Rhonda Wilcox
Michigan Department of Agriculture
and Rural Development (MDARD)
WilcoxR2@michigan.gov

Subject: GAAMPs for Site Selection and Odor Control

Dear Ms. Wilcox,

I am writing as a professional community planner and as an advocate for agriculture. CUPPAD (Central Upper Peninsula Planning and Development Regional Commission) has not addressed the issue and has no official policy.

I support the idea of "Category 4 sites" that are zoned exclusively for residential use and that do not permit Livestock Facilities.

Under Michigan law, local jurisdictions that exercise zoning authority are obligated to provide for all lawful land uses for which there is a reasonable demand. So local communities are generally obligated to provide for livestock facilities somewhere within their jurisdiction.

As things currently stand, it appears that any individual with a piece of land anywhere in the state can start a small scale livestock facility, regardless of a jurisdiction's master plan or zoning. Communities with their planning and zoning have to take many community values, facts, and considerations into account in their attempts to promote the overall health, safety, and general welfare of the entire community. I assert that it is unreasonable for an individual to claim the right-to-farm anywhere, and throw all other community considerations out the window. In the long run, if small livestock facilities are imposed in strictly residential areas, ill will toward and a backlash against agriculture can be expected.

The process through MDARD to check, review, and rule on sites with a complaint, only takes "agricultural standards" into account, with no consideration for the community as a whole. Furthermore, this whole approach is after the fact, after a perceived problem has arisen, and a complaint has been filed. Planning and zoning, in contrast, is intended to prevent problems in the first place. Finally, the complaint process places an unreasonable and impractical burden on MDARD given the potential hundreds (even thousands) of small site complaints.

To provide for small livestock facilities, first the local community (jurisdiction) exercising zoning authority should have the right to choose what zoning district or districts, an "agricultural land use" is permitted in. Remember, they are obligated to provide for it somewhere.

Second, I would suggest perhaps a state standard for small livestock facilities (amend the zoning enabling act). The focus should be to generally prevent community problems, rather than maximize the number of animals site by site. To accomplish this a "Hobby Farm" permitted land use is suggested. The permitted land use approach should provide the hobby farmer a greater degree of confidence of operation, in the district where it is allowed. The State of Michigan then could also be assured of a greater uniformity of regulation and reasonableness of regulation at the local levels across the state. This would be in contrast to a "conditional land use" approach. The following would hopefully be fairly simple and straightforward to administer.

MDARD may want to adjust the minimum acreages by category, or increase the number of categories. MDARD may also want to adjust numbers of animals by type. Above ten (10) acres (or other higher MDARD chosen threshold), the livestock facility would fall under MDARD's normal process for complaint review, inspection, and ruling.

Hobby farmers almost by definition are going to be amateurs, not necessarily experts at keeping clean, tidy livestock facilities. The standard needs to be set to account for the average, to somewhat poor operator, thus providing a healthy margin for errors. Keep it as simple as possible.

Hobby Farm (a proposed permitted land use in the State of Michigan)

An Accessory Residential Animal Hobby (hobby farm) on non-farm lots or parcels outside of an existing residential plat, subdivision, and condominium development, unless such development is originally designed to provide for said accessory residential animal hobbies as provided herein.

Raising of hobby animals (but not including feedlots) on parcels of land less than ten (10) acres in area shall be limited to one (1) animal unit¹ for the first five (5) acres (See rationale below), plus one additional animal unit for each two (2) additional acres. Such use shall be accessory to an existing residential dwelling located on the same lot or parcel. Animals kept for a bona fide youth club or class project are included under this permitted use. All hobby animals shall be kept within a fenced enclosure or other appropriate barrier sufficient to contain hobby animals on the premises. No hobby animals or animal buildings or pens shall be located closer than fifty (50') feet from any abutting property line, except that hobby animal

¹ All other animal types not in the table above are to be calculated as one thousand pounds live weight equals one animal unit.

paddocks (see definition below) may extend to a fence at the established property line. All hobby animals or animal buildings and enclosures shall be kept in a well-maintained condition, and waste materials shall not create a health hazard or an animal nuisance. Storage or piling of waste materials shall be confined to areas where hobby animal buildings and quarters are permitted (accessory building) and away from wells, water bodies, and drainage ways. Notwithstanding the below table, offspring of said hobby animals may be kept on the premises for the time period which is customary for the species involved. A plot plan only (not a full site plan) is required for this use (See Section 100.03).

On five-(5) to 6.99, seven-(7) to 8.99, or nine-(9) to 9.99 acre parcels the following numbers of hobby animals shall be allowed.

Type of Hobby Animal	Number of Hobby Animals Allowed On		
	5-6.99 Acres	7-8.99 Acres	9-9.99 Acres
Cattle (slaughter & feeder)	1	2	3
<i>EQUIVALENTS²</i>			
Horse	-	1	2
Mature Dairy cattle (milked or dry)	-	1	2
Swine ³	2	5	7
Sheep, lambs, goats	10	20	30
Turkeys	30	60	90
Laying hens	30	60	90
Ducks	5	10	15
Ostrich, emu, llama, & alpaca	2	4	6

Rationale for the five (5) acre minimum is based on the following premise;

1. One-quarter (¼) acre needed for the dwelling site and well.
2. Two and one-half (2.5) acres needed for septic tank and first drain field.
3. Two and one-half (2.5) acres needed for a replacement (2nd) drain field.

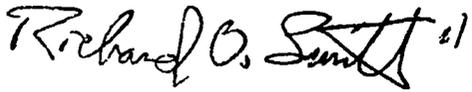
Paddock Defined: A fenced in or otherwise contained area for hobby animals to roam, exercise, browse, and/or otherwise behave normally in accordance with the species characteristics. The paddock will have at least 80% vegetative cover (grass, clover, etc.), unless the specific species contained therein dictates a different, more appropriate natural environment.

² The animal equivalents shown here are based on U.S. Code of Federal Regulations: 40 CFR 122, Appendix B (§122.23)

³ Each weighing over 25 kilograms, approx. 55 lbs.

Thank you for your consideration. I hope these thoughts prove to be coherent and of some value.

Sincerely,

A handwritten signature in black ink that reads "Richard O. Smith" with a stylized flourish at the end.

Richard O. Smith, Community Planner
CUPPAD

Wilcox, Rhonda (MDA)

From: JStraub <JStraub@lawssa.com>
Sent: Wednesday, January 22, 2014 4:50 PM
To: Wilcox, Rhonda (MDA)
Cc: druzick@antwerptownship.com; David Jirousek <jirousek@lsiplanning.com> (jirousek@lsiplanning.com); Heather Mitchell (hmittchell@antwerptownship.com); THEyn
Subject: Site Selection GAAMP Proposed Changes 500.39431

Dear Mr. Wilcox,

I represent the interests of Antwerp Township, Van Buren Township, Michigan.

I have had an opportunity to review the changes suggested for the Site Selection GAAMP with the Township supervisor, Daniel Ruzick and the Township Planner, Dave Jirousek from LSL Planning. The following are our thoughts with regard to the proposed changes.

- Definition of Livestock Facility on Page 3 repeats the definition of farm animals “as defined in the Right to Farm Act” but the RTFA does not define farm animals.
- Definition of Category 4 Sites on Page 12 is unclear. First, sites zoned exclusively residential are not acceptable locations for livestock facilities regardless of number of what—number of livestock or number of facilities. Likely intent appears to be number of livestock but would suggest clarification by adding the words: of livestock.
- Definition of Category 4 Sites on Page 12 is unclear. Second, how does this Category 4 definition apply to existing farm operations in residentially zoned districts? Would a preexisting farm operation located in a residentially zoned area be able to obtain GAAMP Site Selection compliance? Would a preexisting farm operation located in a residentially zoned area be able to obtain GAAMP compliance in other GAAMP categories? What category classification would be appropriate for a zoning district that allows both farms and residential use?
- Definition of Category 4 Sites on Page 12 is unclear. Third, if there is an existing farm operation in a residentially zoned district, and the farm is attempting to obtain compliance with applicable GAAMPs, will the adoption of the Category 4 Site definition preclude that farm’s ability to become GAAMP compliant other categories?
- In absence of applicable GAAMPs (for whatever reason, e.g. location in Category 4 area, or lacking requirements to qualify as a farm operation) what does MDARD suggest as appropriate standards for local municipalities to adopt regarding regulation of animal density, manure management, odor management, set back and other similar concerns in order to foster good land stewardship and protect neighboring land owners?

In general, it appears that MDARD is attempting to distance itself from the enforcement of the RTFA in smaller farming operations which are located in or near existing residentially zoned districts. This distancing by MDARD, without accompanying direction to local municipalities about what might be appropriate regulatory schemes for such small farm operations seems contradictory to the goals of MDARD.

Your response would be appreciated.

Jim Straub
Straub, Seaman and Allen, P.C.
1014 Main Street

St. Joseph, MI 49085
DD 269.982.7717 Cell 269.921.3642

Straub, Seaman & Allen, P.C.

FOR BUSINESS. FOR PROPERTY. FOR LIFE

ATTORNEYS AT LAW

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Wilcox, Rhonda (MDA)

From: Shady Grove Farm U.P., LLC (Randy & Libby Buchler) <rlht@charter.net>
Sent: Sunday, January 19, 2014 2:07 PM
To: Wilcox, Rhonda (MDA)
Subject: Proposed GAAMP amendments

Hello. I am writing in regard to the proposed amendments to the GAAMPs. I am most concerned with the Site Selection revisions. With the current language of the GAAMPs, any farm that is GAAMP compliant and meets the criteria of a "farm" having a "farm product" and being "commercial in nature", are offered Right to Farm protection.

Our story here at Shady Grove Farm U.P. is a perfect example of how the Right to Farm Act can be applied and used as a defense for an Environmentally Verified Farm, producing quality food for the community. Through the MAEAP process, none of the technicians or verifiers had any issue with what we were zoned. That didn't matter to them. What mattered were our farming practices and compliance with the applicable GAAMPs. As a matter of fact, they couldn't believe that anyone would even have a problem with our operation. They thought our farm was very diverse and our practices were exemplary compared to other farms. In fact, on MDARD's own web site, it says this:

"The Michigan Right to Farm Act provides nuisance protection for farms and farm operations which are in conformance with GAAMPs. These GAAMPs are reviewed annually by scientific committees of various experts, revised and updated as necessary." The proposed changes are NOT based on science and are NOT necessary.

In that section, it mentions nothing about zoning. Because, the fact is, zoning has nothing to do with a farm's practices or GAAMP compliance.

When Joe Kelpinski, Erin Satchell and Holly Wendrick got done finalizing the paperwork and had me sign it, in our kitchen, Joe stood up and said, "you now have right to farm protection". At that point, I have no idea if he knew that our township was filing a suit against us or not. But, the point is, he did his job the way it is supposed to be done, he applied the rules as they are supposed to be applied and he told us we have protection via a state law because we were found to meet ALL necessary criteria per the Michigan Department of Ag and Rural Development's own standards. THAT is how the Right to Farm Act is supposed to work.

With the newly proposed language and definitions, in particular the "Livestock Facility" definition, these protections will be wiped out for many Michigan farms due to outdated zoning and local municipalities over reaching their authority. Adding the definition "Livestock Facility" is simply a move to eradicate farms in an urban or rural setting, if not zoned for Agriculture. This would allow local governments to simply change zoning to boost tax revenues and prohibit us, the tax payers, from utilizing our right to farm and our right to choose how we live and what we eat. Changing the number of animals from 5,000 (Livestock Production Facility) to ANY number of animals (Livestock Facility) is ridiculous and completely unnecessary. There is no science based evidence to support these changes, which is what these changes are intended to be based on. If a farm, regardless of zoning, can meet the requirements to be GAAMP compliant per your OWN rules, then why should it matter what zoned district it is in? They are YOUR rules, regulations and standards, after all. In addition, those of us with small operations are much more likely to be environmentally sound.

With the local food movement gaining momentum, with Farmers Markets popping up throughout the state, with tax payers waking up and realizing the importance of healthy food, we NEED small farms. We need MANY small farms to create sustainable, local food systems. There is room in this market for ALL farms. Putting profits aside for a minute, because I know that's what this is really all about (MONEY), let's look at a person's rights. We have the constitutional right to choose what we eat. We have the

constitutional right to grow food. And, we have the constitutional Right to Farm. If someone can't be compliant with the applicable GAAMPs, then they are not provided that protection. And, as far as Townships and Cities, they already have a way to introduce zoning that is in direct conflict with the MRTFA. They have to send it to you folks for approval. Yet, no municipalities do that. They just take people to court, trying to use bullying tactics and the fact that most people can't afford a lawsuit to their favor. That's exactly what happened in our case. "The Buchler's can't afford a lawsuit, so let's take them to court." This type of action is criminal, to say the least. There is another case where a local official trespassed with a gun! The constitution and laws are there for a reason. We can't just go changing all of the rules simply because we don't like them. WE must look at the big picture, our future! The importance of having many small farms scattered throughout the great State of Michigan can't be stressed enough. For the future of food security, we NEED as many farms as we can get.

Now, aside from the fact that no changes are needed in the language of the Right to Farm Act, or the Site Selection GAAMP, there is this: Your agency can't simply rewrite the law. You only have the authority to carry it out as the legislature intended. If you are going beyond that, you are violating the separation of powers. We must look at the direction that the lobbying from corporate ag is taking our government. You folks work FOR the people. You are required to do what is BEST for the PEOPLE. Stripping tax payers of our constitutional right to be protected by a State Law is not the answer. Providing the protection of the Right to Farm Act for ALL compliant farms IS the answer, which is what the current language of the Right to Farm Act and GAAMPs (Site Selection...) does! These proposed changes will make the country's strongest Right to Farm Act the weakest. The proposed language to the Site Selection GAAMP is a blatant attempt at eliminating small farms in areas that are zoned something other than "agriculture", even if we are compliant with the current GAAMPs. The changes would deem the Right to Farm Act as unconstitutional as it takes away the rights of farmers in non-ag areas.

It is my hope that you as the Commissioners of Agriculture and Rural Development for the State of Michigan will see that these proposed amendments should not be adopted. For the greater good of our people, we must retain the Right to Farm for ALL farms. For the future of farming in Michigan, we must retain the Right to Farm for ALL farms. For the future of food security, we must retain the Right to Farm for ALL farms. Remember, many small farms is a sustainable idea...a few corporate farms is not!

Thank you for considering doing the right thing,

Randy Buchler
Farmacist ~ Let they food be thy medicine.

Randy & Libby Buchler
Shady Grove Farm U.P., LLC
Grateful Eggs - Laid by Hippy "Chicks"
Certified Naturally Grown (CNG)
MAEAP Verified (All 3 systems)

Wilcox, Rhonda (MDA)

From: Gary Stock <nexcerpt@gmail.com> on behalf of Gary Stock <gstock@nexcerpt.com>
Sent: Tuesday, January 21, 2014 3:00 PM
To: Wilcox, Rhonda (MDA)
Subject: Comment on proposed Right to Farm changes

RW:

I'm writing to support the return of Michigan's Right to Farm Act (PA 93 of 1981) to its original legislative intent - especially to prevent its use in petty disputes among neighbors on small residential lots.

I have long been involved with land use policy, including previously as founder and President of Southwest Michigan Land Conservancy; member and chair of Van Buren County Planning Commission; and currently as member and chair of Antwerp Township Zoning Board of Appeals. I do not represent those bodies here, but speak as a private citizen, from broad experience with landowners and bona fide farmers across the region.

The proposed changes appear to reduce the reach or application of RFA in areas zoned residential. I support such changes. As you know, RFA may be exploited by "hobby farms" to defend activities not anticipated by the legislature in drafting or implementing the Act, while GAAMPS may be invoked by others who seek to prevent these same activities!

It seems unnecessary to delve here into the Act's original intent, which you, in proposing such changes, clearly understand.

Over the past year, I have observed firsthand the confusion, conflict, and anxiety inflicted by people on both sides of this issue -- upon themselves, their neighbors, this community, and far beyond.

A residential homeowner on several acres invoked RFA to try to defend husbandry effects that some neighbors saw as a nuisance. The neighbors then invoked GAAMPS under RFA to minimize or prevent those activities.

Both parties were at times disrespectful; neither revealed much genuine desire for an amicable outcome. Looking back at decades of local disputes, this one ranks among the most foolish and needless.

The party "farming" generated baseless hysteria across many counties and states by aggressively courting social and conventional media, and misrepresenting the Township's authority, position, and action. (I repeatedly and personally advised them against doing so, to no avail.)

The parties "complaining" offered similarly troubling accusations -- in some cases making practically no sense - - while demanding repeated intrusive site visits from local and state officials. (I contradicted some of their claims personally, as well as in public meetings.)

Over months, the Township endured a series of absurdly angry hearings, at which throngs of strangers -- recruited to join a cause over which they had been misled -- accused local officials of every manner of dishonesty and subterfuge, where none existed. Similarly ignorant insults continued arriving for months by phone, email, and post.

That story could go on for many pages. What is important is that even IF that hobby farm were granted "protection" under RFA, and even IF that hobby farm were to comply with all applicable GAAMPS, THE CONFLICT ITSELF WILL PERSIST, AND LIKELY WORSEN.

This is not about "farming." This is about a few people -- some on both sides of the issue -- choosing to be disrespectful.

The net effect of the entire affair seems to be 1) to undermine Township authority to enforce its nuisance ordinance in a residential area, and
2) to consume large amounts of MDA and MDARD (and who knows how many other agencies') time in a fruitless effort to convince a few residential neighbors to behave in a more civil way.

I support whatever must be done to prevent such needless waste of public resources -- not only in this case, but in any case.

I support whatever change may be made to RFA to preserve its viability as a defense for bona fide agricultural operations -- not as a toy.

I support whatever enforcement of GAAMPS permits the scope and scale of agriculture anticipated by RFA -- not absurdly more; not absurdly less.

I support whatever opinions MDA may issue that respect locally adopted nuisance standards -- not to push them aside with too broad a brush.

I must mention that I find permits for CAFOs under RFA similarly disturbing. No 1981 legislator anticipated such massive, destructive, and locally disrespectful activities ever to be considered "farming."

Bona fide agriculture deserves protection under RFA. Dangerously polluting industrial operations such as CAFOs do not -- and neither do small scale gardening and animal husbandry in a residential setting.

Thank you,

Gary Stock
66311 26th St.
Lawton MI 49065

269.624.1140

Gary Stock gstock@nexcerpt.com
Nexcerpt <http://www.nexcerpt.com/> 269.624.1140 direct

Wilcox, Rhonda (MDA)

From: Robert DePalma <supervisor@grovelandtownship.net>
Sent: Tuesday, January 21, 2014 2:59 PM
To: Wilcox, Rhonda (MDA)
Subject: Public hearing comments for GAMP changes

To MDARD's Environmental Stewardship Division,

Dear stewardship board I would like to comment on changes I believe should be considered for GAMPs implementation. I am a strong supporter of farmers rights , and have used GAMPs to protect their right to farm. I do believe that in Oakland county many people who are at best weekend hobbyist are using this program as a tool to aggravate neighbors. Unless someone is really farming , I do not believe that this program should be a loophole for abuse. I am sorry I could not attend the public hearing on 1-22-14, but I just learned of it on 1-21-14 at 2pm. We are living in communities that are quickly transitioning to residential uses. We find people who buy property that has not been in farm use for years, only to have a neighbor decide to buy roosters or other animals for the purpose of creating a problem for their neighbor. I would hope that a change or a carve out for a county like Oakland could be provided. I do strongly want to protect the farmers right to farm without a hassle, but the current law is not balanced. The problems are always on parcels under 10 acres. Help on this issue would be greatly appreciated.

Sincerely Robert DePalma
Groveland Township ph248 634-4152

Wilcox, Rhonda (MDA)

From: S Miles <canc4miles@sbcglobal.net>
Sent: Tuesday, January 21, 2014 2:43 PM
To: Wilcox, Rhonda (MDA)
Subject: Re: Proposed 2014 Site Selection GAAMP's

January 21, 2014

Via Email to: WilcoxR2@michigan.gov
and First Class Mail

Michigan Department of Agriculture & Rural Development
Environmental Stewardship Division
P.O. Box 30017
Lansing, MI 48909

Re: Proposed amendment to Site Selection GAAMP'S

Dear Chairpersons:

I am writing in regards to proposed changes to the 2014 Site Selection GAAMP. I welcome the proposed Category 4 Site Selection; however, the Category 3 Site Selection does permit farming in a residential zoned district and, therefore, needs further revisions.

Specifically, in regards to Category 3, I propose additional language in bold underlined format as follows:

Category 3 Sites: Sites generally not acceptable for new and expanding livestock production facilities.

*The following categories require minimum setback distances in order to be considered acceptable for construction of new livestock production facilities. In addition, review and approval **and authority** of expansion in these areas is required by the appropriate agency, as indicated.*

1. Drinking Water Sources

*An expanding livestock production facility may be constructed with review and approval **and authority** by the local unit of government administering the Wellhead Protection Program.*

2. High public use areas

*The review process will include input from the local unit of government and from people who utilize those high public use areas within the 1,500 foot setback. **The local unit of government shall maintain authority.***

3. Proximity to Residential zones

*Existing livestock production facilities may be expanded within 1,500 feet of areas zoned for residential use with approval **and authority** from the local unit of government.*

It is my opinion that the local unit of government maintains **authority** in a residential zoned district because GAAMP's is voluntary and there is no way for the MDA to enforce them. Lack of enforceability leaves the local unit of government and its residents to deal with consequences of a farmer who is not maintaining or in compliance with GAAMP's. Without the specific language allowing the local unit of government to maintain "authority" in its residential zoned district, it has been well established that the Right to Farm Act has created mass confusion throughout the State of Michigan as to who shall control a so called "black eyed farmer" who does not or will not comply with GAAMP's.

A farmer with knowledge and wisdom will purchase land in an agriculturally zoned district. The lack of MDA enforcement and/or the local unit of government's authority to control farming activities in a residential zoned district, which is generally accommodating hobby farmers, has cost our local units of government and innocent residential citizens thousands of dollars, created environmental and health hazards, and has left the judiciary system in an unwarranted uproar. A few simple added words of clarification can easily resolve these issues.

Thank you for your consideration.

Regards,

Sandra Miles
2580 Gulliford Dr.
Lowell, MI 49331

Wilcox, Rhonda (MDA)

From: Whitman, Wayne (MDA)
Sent: Tuesday, January 21, 2014 12:57 PM
To: Wilcox, Rhonda (MDA)
Cc: Mahoney, Stephen (MDA)
Subject: FW: Proposed changes to 2014 Site Selection GAAMP for New and Expanding Livestock Facilities
Attachments: 2014 GAAMP response.pdf

Rhonda:

Please add this email to the comments on the GAAMPs.

Thanks.

Wayne

From: Walnut Hill Farm [<mailto:farmer@walnuthillfarmmi.com>]
Sent: Saturday, January 18, 2014 3:22 PM
To: wpowers@msu.edu
Cc: james@environmentalcouncil.org; Crook, Michelle (MDA); Culham, Brian (DEQ); steve.davis@mi.usda.gov; hines@mipork.org; lcjones@allegancounty.org; Mahoney, Stephen (MDA); mayg@msu.edu; Miller, Scott (DEQ); kennobis@mintcity.com; spiggot@michfb.com; chanrenn@avci.net; Whitman, Wayne (MDA)
Subject: Proposed changes to 2014 Site Selection GAAMP for New and Expanding Livestock Facilities

Greetings. Please find attached my comments to the proposed changes to the Site Selection GAAMP.

Thank you,

Vikki Papesh

**WALNUT HILL FARM
54180 DEQUINDRE ROAD
SHELBY TOWNSHIP, MI 48316**

January 18, 2014

To: 2014 Draft Site Selection GAAMP Review Committee

Dr. Wendy Powers
James Clift
Michelle Crook
Brian Culham
Steve Davis, P.E.
Sam Hines
Larry Jones
Steve Mahoney
Gerald May
Scott Miller
Ken Nobis
Scott Piggot, M.S.
William Renn
Wayne Whitman

Greetings to all members of the 2014 GAAMPs Review Committee.

I am writing to voice my objection to the language in the proposed 2014 Site Selection GAAMP pertaining to Category 4 sites. Categories 1, 2, and 3 are related both to density of nonfarm residences near the farm as well as number of animal units. The same should be true of Category 4, if defined. Without Category 4, the restrictions of Category 3 are a sufficient restriction as revised.

If altered, this definition would make our rural (no neighbors within 3/4 mile as the crow flies, approximately 200 residents in the entire 36 square mile township and 2/3 of the land is owned by the state) RESIDENTIAL 40 acres ineligible as a suitable place to keep a chicken, turkey, horse, steer. There is NO sound scientific basis in tying zoning to siting. A "residential" zoning does not mean that an area is suitable for constructing a residence, nor that it is inappropriate for other uses. It is merely an indication of potential land use. There are many more factors involved in siting than a tag on an assessor's map.

More time should be spent in considering what the objections are to the keeping of livestock in primarily residential areas. The keeping of animals, whether cat, dog, rabbit, horse, fowl, goat, sheep, cow or any other, should take into account several things: The ability of the site to support the health and welfare of the animal with protection from the elements, proper housing for the type of animal, provision of wholesome feed and water, protection from predators, prevention of vermin, and proper disposal of dead animals and animal waste without offense to immediate neighbors. The Animal Care and Manure Management GAAMPs address these concerns. Conformance with existing and well established scientific principles of livestock management is desirable. In fact, most small farmers provide far more than the published minimum guidelines supported by the state as good management guidelines, especially where floor space, lighting, and ventilation are concerned.

**WALNUT HILL FARM
54180 DEQUINDRE ROAD
SHELBY TOWNSHIP, MI 48316**

No one is promoting a 1000 bird broiler facility in a subdivision back yard. But the ability to keep half a dozen or a dozen hens for the purpose of selling eggs or breeding rare varieties, or raising a clutch of turkeys for market, or keeping a backyard goat for milk and cheese, should be within the ability of anyone who can properly provide the necessary living conditions and can properly care for the animals and maintain the facility so that it is not objectively harmful to those around it. We don't do this to shun society. We don't do this to buck laws. We certainly don't do this to get rich. We do this because we do not believe that the commercial alternatives are necessarily our best choice, and we believe that we can do better. And, based on public opinion (repeat sales), we do.

Those of us who are small producers don't consider that we are going to make much of an impact in the marketplace. All in all our products make up only a small percentage of the market. And I don't think any of us have the goal to price our products lower than the grocery store on these commodity items. What we offer is a unique product, direct from the source. The success of small farms in the local marketplace shows that some of the people of our state DO care about quality, sustainability, and other aspects that custom producers provide. All we ask is that our voice be heard even though we have no representation on the review committee.

The Michigan Right to Farm Act addresses commercial farm operations and it should apply equally to all commercial farms regardless of size or location. I am proud to be among those who have gone through our state court system to prove that the Michigan Right to Farm Act is a viable and valuable law for commercial farming operations. Michigan has a strong farming tradition and this tradition should be upheld, not only for major commercial producers, but also for promoters of genetic biodiversity, drug-free living for our food products, and participation in our food production chain as small family farmers have done for centuries.

Yours truly,

Vikki Papesh

Wilcox, Rhonda (MDA)

From: Daedre Craig <daedrecraig@yahoo.com>
Sent: Tuesday, January 21, 2014 12:25 PM
To: Wilcox, Rhonda (MDA)
Subject: GAAMPS Concerns

Hello,

I am writing to express my concerns regarding the potential changes to the GAAMPS regulations. While I do not own a farm, but I am a proponent of urban chickens. I have heard and seen nothing but positive things resulting from the increase in urban chickens in Ingham County after the Animal Control Advisory Board amended their regulations on urban poultry in 2009.

Urban chickens are a great way for low-income and eco-conscious residents to obtain a secure source of inexpensive sustainably and humanely produced eggs. I understand the purpose of the GAAMPS is more focused on regulating farms, so I would be very disappointed if the changes to GAAMPS also effects urban dwellers who just own a handful of backyard chickens.

Thank you,

Daedre S. Craig
989-400-8212

Wilcox, Rhonda (MDA)

From: christine <moserc@hotmail.com>
Sent: Tuesday, January 21, 2014 1:01 PM
To: Wilcox, Rhonda (MDA)
Subject: Changes to GAAMPS

To:
Michigan Department of Agriculture and Rural Development's Environmental Stewardship Division

I am writing in opposition to the proposed changes to GAAMPS regarding the effect on homesteaders in residentially zoned areas. This is a violation of individual freedom and brings a new level government intrusion into our lives and livelihoods in Michigan. It furthermore threatens small businesses trying to grow and innovate in agriculture.

The original rules were working and I am not sure the state of Michigan wants to impose this on its small farmers and homesteaders.

Christine Moser
Associate Professor
Department of Economics
Western Michigan University

Wilcox, Rhonda (MDA)

From: Holton, Jennifer (MDA)
Sent: Wednesday, January 22, 2014 1:41 PM
To: Johnson, James (MDA)
Cc: Wilcox, Rhonda (MDA); Eyde, Jennifer (MDA)
Subject: FW: MDARD & 4,999 chickens on a 50 x 75 plot

Is there someone who can explain?

Jen

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

From: Philip Lombard [<mailto:plombard@sbcglobal.net>]
Sent: Wednesday, January 22, 2014 12:50 PM
To: Holton, Jennifer (MDA)
Subject: MDARD & 4,999 chickens on a 50 x 75 plot

Dear Ms. Holton,

I read that Jim Johnson - an MDARD division director said that it's MDARD's opinion that 4,999 chickens on a 50 x 75 plot is not fair to neighbors. Would you please tell how many occurrences such as he described exist in Michigan? If possible could you tell me which counties they are located in? How many property owners are attempting to raise 4,999 chickens on a similar size plot?

Would you please let me know instances that are close to the one described? Not exactly 4,999 chickens but between 4,500 and 4,999 and perhaps not only 50 x 75 plots , but also plus or minus 10% of 3750 square feet? (50 x 75 = 3750, 10% being 375 square feet.) Thanks for any help you can provide to fully illuminate the concern MDARD has, as described by Mr. Johnson.

Also, since I live in Ferndale, which allows three hens, how will the proposal affect the owners of those birds?
Sincerely,

Phil Lombard
Ferndale MI

Wilcox, Rhonda (MDA)

From: Dennis Stachewicz <dstachewicz@hotmail.com>
Sent: Wednesday, January 22, 2014 4:51 PM
To: Wilcox, Rhonda (MDA)
Subject: Public Comment - RTFA Draft 2014 GAAMPS

Greetings:

I am writing to you to indicate support for the GAAMP for Site Selection and Odor Control for New and Expanding Livestock Facilities revision which creates a new category number four. I believe the original intent of the RTFA was a protection for existing operations, and not act as a sword for new operations in residentially zoned areas. The new category four will address this situation and support the intent of the RTFA.

The committee should be commended for recognizing the challenges that have been caused in communities and attempting to address them via this important addition to the above mentioned GAAMP.

Regards,

Dennis S.

Dennis M. Stachewicz, Jr.

A grown man walking in the rain with a sodden bird dog at his heel who can smile at you and say with the kind of conviction that brings the warmth out in the open "I'd rather be here, doing this, right now, than anything else in the world," is the man who has discovered that the wealth of the world is not something that is merely bought and sold.

Gene Hill

Wilcox, Rhonda (MDA)

From: PAUL J. SNIADOCKI <psniadecki@yahoo.com>
Sent: Wednesday, January 22, 2014 4:51 PM
To: Wilcox, Rhonda (MDA)
Subject: Proposed GAAMP Change

I support the proposed change to the GAAMP for animal siting.

Residential areas should remain just that: RESIDENTIAL !

Paul J. Sniadecki
23949 N Shore Dr
Edwardsburg MI 49112

Wilcox, Rhonda (MDA)

From: Janis_Hagyard@kayautomotive.net
Sent: Wednesday, January 22, 2014 2:57 PM
To: Wilcox, Rhonda (MDA)
Subject: Michigan's Right to Farm Act

To Whom it May Concern:

Please don't allow the removal of the Michigan Right to Farm Act. It has a valuable role in protecting our agricultural heritage for suburban and hobby farms in Michigan. It will be detrimental to thousands of youth that participate in 4H livestock projects. Many of these youth come from suburban settings and they raise livestock for their county 4H Fair. These projects are great learning opportunities and often lead to career opportunities for these youth. We need the protection so our townships can not arbitrarily remove our rights to farm and raise or grow our own food.

Janis Hagyard
Lake Orion, MI

Member of the Oakland County 4H Poultry Club & the Blue Ribbon Rabbit & Cavy 4H Club This message (including any attachment) is intended only for a specific individual. If you are not the intended recipient, or the agent or employee responsible to deliver it to the intended recipient, you are hereby notified that any reliance upon or use, dissemination, distribution or copying of this communication is strictly prohibited.

If you have received this email in error, please notify the sender immediately and destroy all copies that you may have of this communication.

Wilcox, Rhonda (MDA)

From: M Almay <solacere@research.hotmail.com>
Sent: Wednesday, January 22, 2014 4:37 PM
To: Wilcox, Rhonda (MDA)
Subject: GAAMP task force comments

I would like to submit comments to those concerned with the changes to the Right to Farm Act.

I live in a fairly rural area, near farms, but most of the houses along the main roadway are close together, about 1 acre or less parcels, in Osseo Michigan.

Last year, a couple moved in to the house next door and commenced to developing a small farm. They have no idea what they're doing, just bought a ton of animals, and on their acre of land, began to "become farmers".

It has ruined this area. They don't clean after the animals at all, and the smell is just disgusting, most especially in the summer. They bought several roosters, which call out all day long, and into the evening. Their rabbits are commonly loose, so you find their carcasses half eaten by predators, and they and their children are always running in to my yard trying to catch an animal that "escaped" them, including their dogs, which they have several of, and can't even handle them in a proper legal manner. They've left their dog outside for hours with an electric shock collar on, and after numerous calls to the police in animal cruelty complaints they stopped, but that's not a sign of people who take care of animals properly.

The county can't do much, although they did come out and checked, and found that the numerous rabbits were inhumanely kept too many to a cage and they were cited and given a warning about it. In the days afterward, the husband was hauling the manure to the back of their property, where he dumps it in piles, along with the carcasses of the animals that die there. The neighbors that used to live on the other side of them moved, they couldn't take the stench, which is truly grotesque. After that visit they erected tarps so that the animals conditions in the cages could not be seen.

Worse was this winter, when we have had horrible sub zero temperatures, and the only shelter provided from the chilling wind and cold were the tarps thrown over cages. I can't imagine how many of their animals suffered and are currently suffering without any shelter at all, but did see some rabbits being removed from the cages and thrown into a cart after a prior cold snap, it was really sad and disgusting

They have, at what I can see, several goats, about a dozen chickens, 6 or so turkeys, several roosters and dozens and dozens of rabbits, more cages go up all the time. They also have several dogs, many cats and they scream and swear at their children constantly for them not doing the work around there.

However, if you take these regulations away, our area has no zoning laws or ordinances. You will stop the area from being able to keep these people in check at all.

Maybe formulating something that covers small farms would be better. Something that sets higher standards because they're conducting their "farm" in a residential area. Their cages are next to their back door, like RIGHT next to the back door, and by the dozens. The runoff to our water supply and the noise, it's just

unreal. Our county doesn't have a noise ordinance, so they can't prosecute complaints, but the roosters they have never stop crowing, sometimes even in the middle of the night for hours on end.

They may not care about the unsanitary conditions of their makeshift farm, but it's altered my life to have their "farm" brought right outside my back door.

I encourage you to try to find another solution, something that would cover these tiny residential farms so as to not drop regulations and end up making it worse for those in the area that would then have no recourse at all, if that would be the case. Forming a "gap" that would make them not be policed at all in areas where they're technically not managed at all would be a huge mistake! My township supervisor told me outright, that without my neighbors being regulated as a FARM, they could not be regulated at all.

That can't be the committee's intent! If you drop them from the act, some of these horrible residential makeshift farms will be unstoppable and the conditions will worsen horribly.

These people are part of networks that help exploit the laws of farms for their purposes, and they will get the word out. What you'll then have is unchecked inhumane conditions for these animals, and these neighbors of mine sell those animals at the Hillsdale County fairgrounds. What if they're diseased from the poor conditions because no one can do anything about it once you remove any and all regulating by not covering them with this act, or another you may wish to write?

I never had any problems about them setting up a place for farm animals didn't mind it at all, until they were so unclean that rain covered my backyard with rabbit feces runoff, and their roosters were outside my window daily almost 24 hours a day crowing in competition with one another, and they were cruel to the animals they buy.

Wilcox, Rhonda (MDA)

From: M Almay <solacere@research.hotmail.com>
Sent: Wednesday, January 22, 2014 4:40 PM
To: Wilcox, Rhonda (MDA)
Subject: GAAMP task force comments
Attachments: farm 7 .JPG; farm 6.JPG; farm 2.JPG; farm 8.JPG

I would like to submit comments to those concerned with the changes to the Right to Farm Act.

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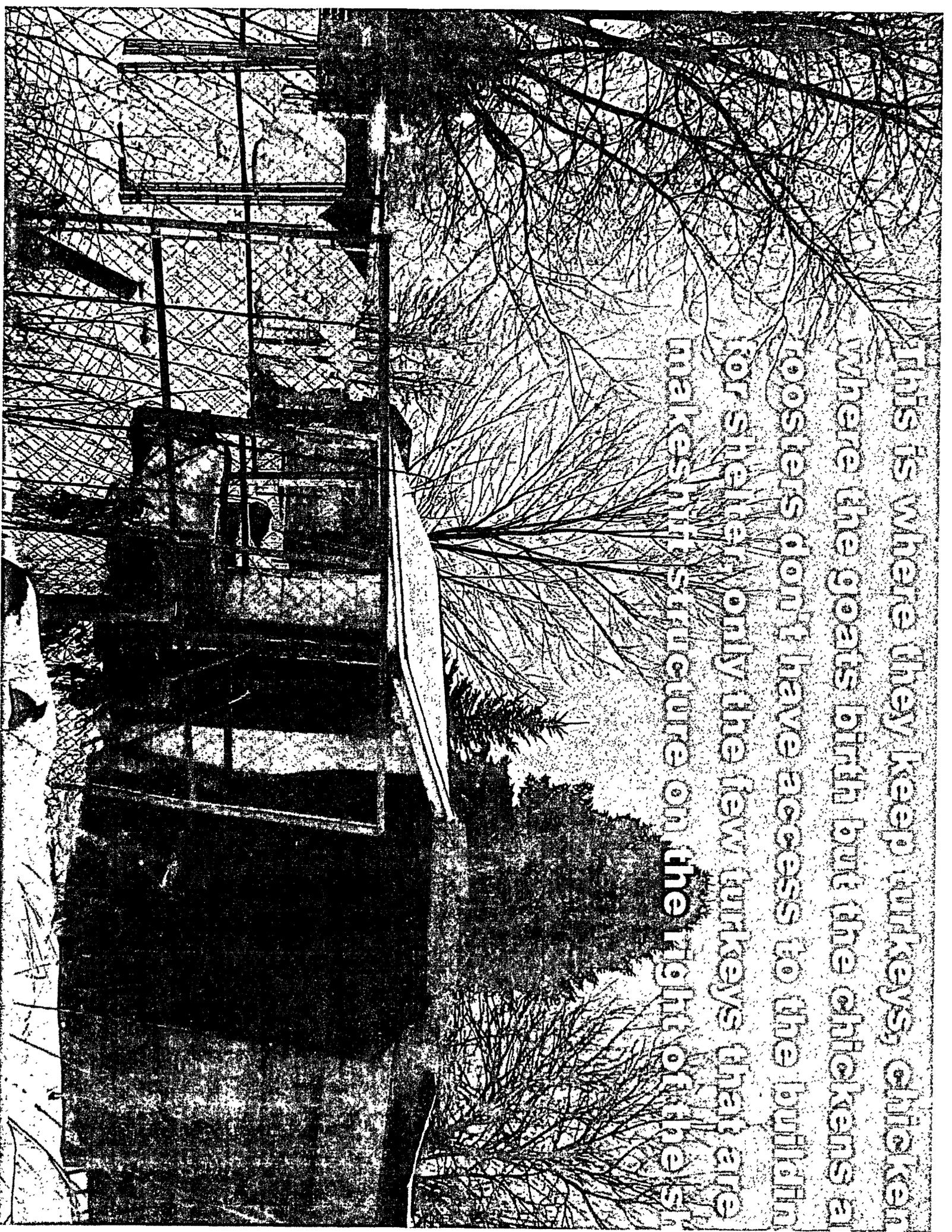
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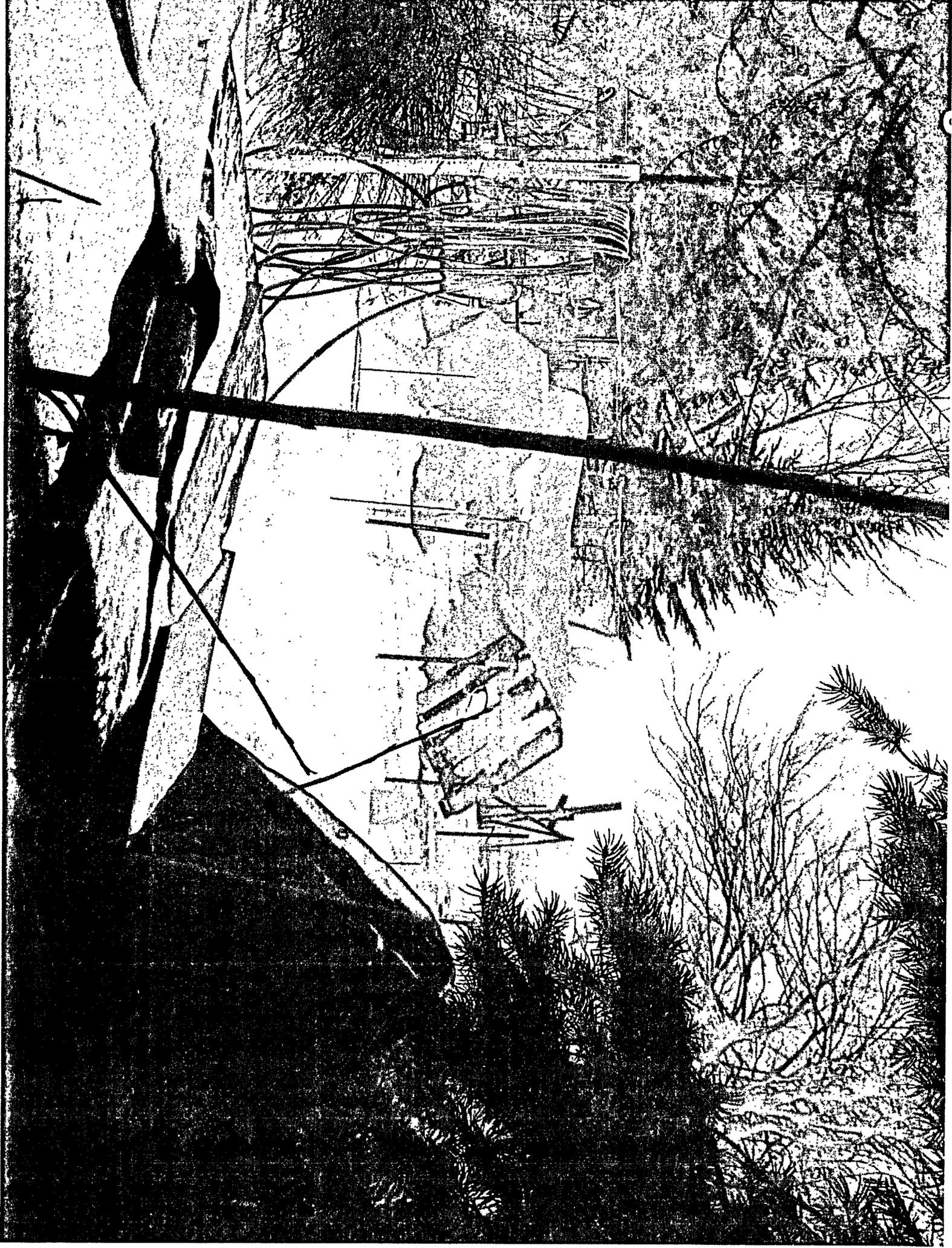
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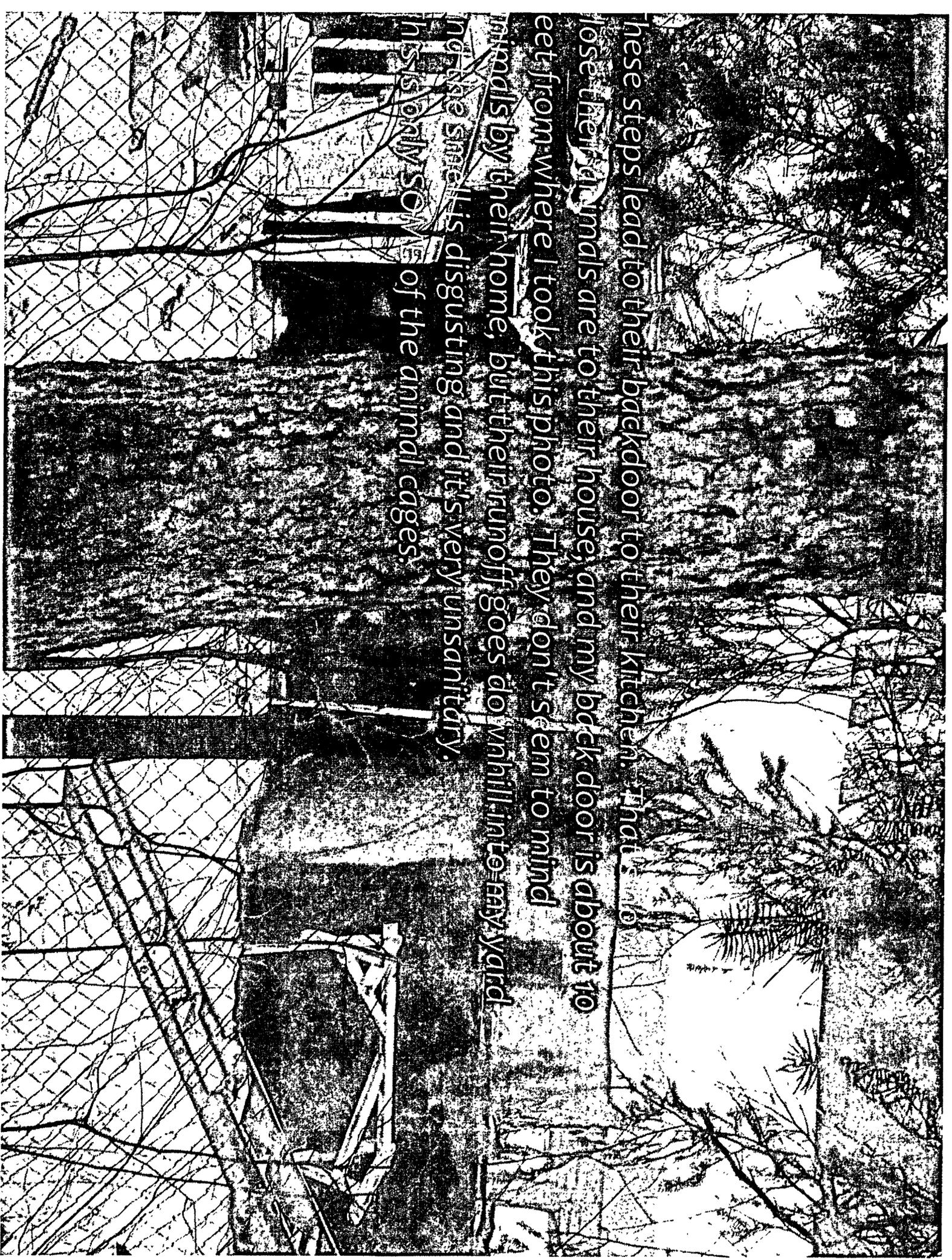
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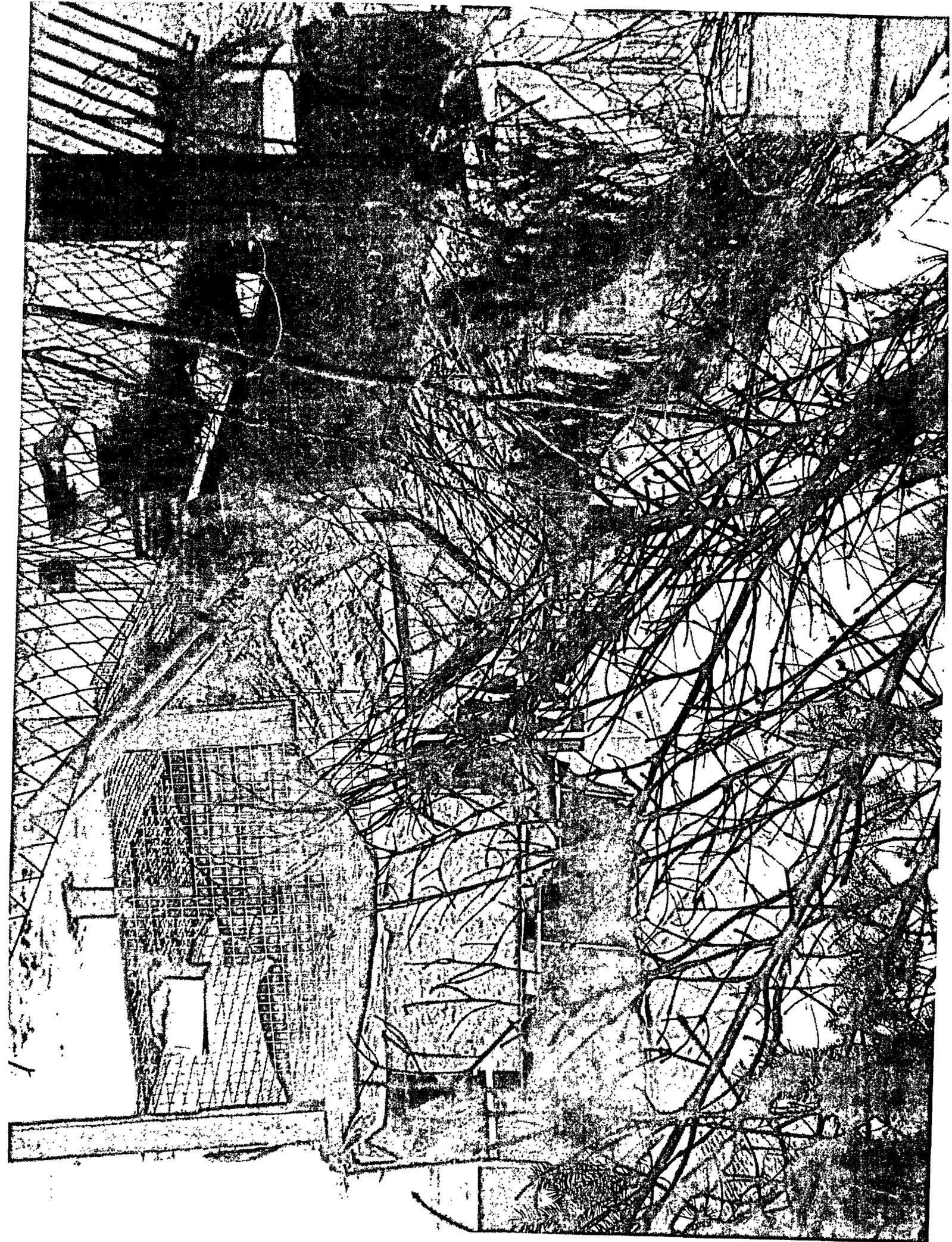
This is where they keep turkeys, chicken
where the goats birth but the chickens a
roosters don't have access to the buildin
for shelter, only the few turkeys that are
makes it structure on the right of the st





These steps lead to their backdoor to their kitchen. That's how
close their animals are to their house, and my back door is about 10
feet from where I took this photo. They don't seem to mind
animals by their home, but their runoff goes downhill into my yard.
It's disgusting and it's very unsanitary.
This is only some of the animal cages.





---_com.android.email_8619210712498420--

Wilcox, Rhonda (MDA)

From: Rachael Hilliker <raerocks@gmail.com>
Sent: Wednesday, January 22, 2014 9:22 AM
To: Wilcox, Rhonda (MDA)
Subject: Michigan Right to Farm Act-Comments

I am extremely disappointed to hear about the Michigan Department of Agriculture and Rural Development (MDARD) unscientific involvement with the Right to Farm Act. Especially when research has shown that farms or farming related operations in residential areas (especially urban) are good for the local economy, citizen health AND property values.

"More than 500 U.S. cities, including Sioux Falls, now allow backyard chickens, and citizens such as Craven and Steen reflect a growing national trend by people who want more control over their food supplies for health, nutrition and/or environmental reasons.

Rapid City Hens disputes the notion that property values are lowered by chicken-keeping neighbors. **Research shows that nine out of the 10 U.S. cities with the most-stable property values are also places that allow backyard chickens within city limits.**" (Full article below)

In addition to examples like this, I am wondering if anyone considering this issue has ever heard of the proverb "Give a man a fish, and you feed him for a day; show him how to catch fish, and you feed him for a lifetime." Has anyone considered the work being done in Michigan to help teach Michiganders (especially low income folks) how to grow their own food (vegetables, fruits, chickens, etc.)? We allow SNAP recipients to buy plants at the farmers markets and we even "double up" their benefits-- and people complain that welfare recipients are lazy-don't want to work, etc. If we continue to road block opportunities for them to be self-sufficient how will this ever change? We should be doing just the opposite of this-allow them to purchase chicks (no roosters) with their SNAP benefits and teach them how to grow their own food!

My biggest issue with the proposed change is the language: "sites that are exclusively zoned for residential use . . . are not acceptable locations for livestock facilities regardless of [the] number [of livestock]. Confining livestock in these locations does not conform to the siting GAAMP." This would mean even a home in a residentially zoned area with ONE COW for the purpose of producing a healthier milk option for their family would be shut down! As someone with a digestive disease (ulcerative colitis) I am very upset about this. I often purchase milk and dairy goods from small residential farmers because I know that the cow was not given chemical laden corn feed, hormones, antibiotics, etc. When I consume dairy products that are free from these chemicals, my digestive system is healthier. AND when I buy them locally I not only know where my food came from but I am helping our local economy.

I can understand not wanting a CAFO (confined animal feeding operation) with many livestock in a residential area, but saying a single cow or a few chickens is a threat to public health or the environment is both false and irresponsible. I would be happy to provide you with actual research showing why this change your propose will damage our economies, negatively impact the health of our citizens as well as lower property values in large urban areas. Please-don't make these changes.

Rapid City Hens flock together to rally support for backyard chickens



June 10, 2013 6:30 am • [Mary Garrigan Journal staff](#)

Brita Craven and her family moved to Rapid City from Santa Rosa, Calif., last year and were disappointed to learn that they couldn't raise chickens in their backyard here.

Craven had kept six chickens for egg production in a backyard coop in her urban, northern California neighborhood and had assumed she'd be able to do the same in Rapid City.

But in 2011, the Rapid City City Council decided she couldn't.

Craven, who didn't live in Rapid City during those "chicken fights," hopes the council will revisit its decision.

"When we planned to move, we were utterly heartbroken to learn that Rapid City did not allow backyard hens," Craven said. "If we would have had an option of cities to choose from, we would have selected the one that allowed backyard hens."

Current city codes allow chickens and other fowl within city limits, but only on properties larger than 3 acres and only if the birds are kept at least 150 feet away from homes.

The 2011 campaign to permit up to six hens in single-family backyards within city limits was rejected by the council on a 5-5 vote. The issue ran into strong negative reaction and plenty of feedback from local residents who were primarily concerned about noise, smell and declining property values if their neighbors began raising chickens.

Craven and Savanna Steen are two members of Rapid City Hens, a new local-foods advocacy group that formed in April. They said they hoped a well-informed public and a better-educated city council will come to embrace a national trend toward urban chickens.

"We want to address citizens concerns first, before we propose an ordinance," Steen said. "There are so many misconceptions about chickens — that they're dirty and noisy. Actually, backyard chickens create far less noise and poop than the average dog."

A small, well-maintained flock that doesn't contain roosters will produce eggs without noise or smell, she said. The group's name explains what it is seeking: the right to raise hens, not roosters, within the city limits of Rapid City. Steen, who grew up eating farm-fresh eggs on a Wyoming ranch, said she wanted to be able to keep four or five chickens in her Rapid City backyard so that she can feed them to her own two children.

"We want to be able to have hens to provide food for our families. We really want to show the public the great things that can come from backyard chicken-keeping," Steen said said.

Craven said she was surprised by the benefits the fowl brought to her family and her community in California.

"The benefits of having backyard hens enriched our lives in more ways than we could have ever imagined," she said, far beyond the half-dozen fresh, organic eggs they harvested daily that help control their 12-year-old

daughter's Crohn's disease. Neighbors and passersby often stopped to watch the birds and to admire the attractive, handmade coop. "It built community," Craven said, because people appreciated seeing the virtue of self-sufficiency lived out in their neighborhood.

"It's a myth that most people want to see lawns, not gardens; beige, not color; conformity, not individuality. Living in the city should not mean we forfeit our ability to be self-reliant," she said

She added that she was pleasantly surprised that her own fears about smell, predators, noise and the neighbors' disdain did not materialize. Craven said she finds most of the people who oppose urban chickens were raised on farms where large flocks created a lot of stinky animal waste.

"However, small flocks with clean coops don't have the same issues and cannot be compared," she said.

More than 500 U.S. cities, including Sioux Falls, now allow backyard chickens, and citizens such as Craven and Steen reflect a growing national trend by people who want more control over their food supplies for health, nutrition and/or environmental reasons.

Rapid City Hens disputes the notion that property values are lowered by chicken-keeping neighbors. Research shows that nine out of the 10 U.S. cities with the most-stable property values are also places that allow backyard chickens within city limits.

"This time, we're really focusing on educating the public and the council members," Steen said.

Backyard chickens are even good for the local economy, Craven argued. "One aspect of city hens that is often overlooked is job-creation," she said. Local pet shops and feed stores benefit from sales of equipment and supplies; carpenters sell handmade coops (some of which sold for \$1,500 or more in California), and many cities sponsor Tour des Coops, promotional events where people view innovative, interesting coop designs.

"The community stands to benefit in many ways by allowing small backyard flocks," Steen said.

Rachael Hilliker
Owosso, Michigan
Cell: 517-410-6708
Twitter: @rachaelhilliker
Website: www.rachaelhilliker.com
Skype: RachaelHilliker

Wilcox, Rhonda (MDA)

From: Brooke Comer <brooke.michele@gmail.com>
Sent: Wednesday, January 22, 2014 1:06 PM
To: Wilcox, Rhonda (MDA)
Subject: Wrong Changes in GAAMPs

Dear GAAMPs committee,

I am writing to express my disapproval of the proposed changes to the GAAMP's which focus on restrictions to small farms and livestock in residential areas. We should be moving in a direction that promotes more small and local agriculture and not in one that makes it harder. Small farms near residential areas and livestock on residential land have the ability to not only be safe and non-intrusive, but can promote food security and build sustainable communities while having a positive effect on the environment. Please think of revising your current recommendations to reflect what is truly needed in our communities and agricultural system.

Thank you for taking my comments under consideration.

Brooke Comer

Graduate Research Assistant
Department of Horticulture
Michigan State University

brooke.michele@gmail.com
540-398-8168

Dear MDA,

I am writing to express my concern over the proposed change in GAAMPs you are considering. I am a researcher at Michigan State University for sustainable agriculture and very involved in the local food movement. I am also involved in community and neighborhood development projects and member of a very diverse social and economic neighborhood.

Our current agricultural system, based on large farms and high use of fossil fuels is a dangerous and unsustainable system. In recent years some progress has been made through research and movements that have shown the benefits of small scale local food systems. They not only produce healthier food with less of an environmental footprint, but they build community and increase food security as well. I am reading all the time about new developments across the country where farms are being reintegrated back into our communities and the benefits that come about from these actions.

The changes in the GAAMP's make a statement that Michigan is not on board with this progress. In stead of suggesting that residential lands are not acceptable for livestock facilities, we should be protecting those that want to be responsible enough to raise their own food. Putting in contingencies similar to Lansing's current code: maximum of five hens, no roosters, 10 feet from the property line, 40 feet from adjacent buildings without

written permission; would allow people to produce their own food while not infringing on the rights of their neighbors.

We should also be making movements to integrate small farms into our communities. The changes that further restrict new small farms near residential areas are a step backwards in achieving this goal.

There are many people in my department, and in my neighborhood that strongly agree with what I am writing. I hope you take this into consideration and rethink your changes to the GAAMPs.

Thank you,

Don Comer

Research Assistant
Plant, Soil, and Microbial Sciences
Michigan State University

Founder and Executive Director
The GROW Initiative
www.growinitiative.org
[517.648.8222](tel:517.648.8222)

Wilcox, Rhonda (MDA)

From: Suzanne Scoville <suzannescoville@yahoo.com>
Sent: Wednesday, January 22, 2014 1:40 PM
To: Wilcox, Rhonda (MDA)
Subject: Proposed changes in Michigan Right to Farm Act

Thank you for hearing us out, Ms. Wilcox, in what I assume is a very heated subject.

I live in Detroit where I operate an urban farm. The main product of the farm is duck eggs, and I currently keep 20 free range ducks in 4 city lots, and supply two restaurants with eggs, as well as a few private customers.

The farm has been a viable business in otherwise bleak times for the city, and it is one of the few good things that has come out the neighborhood's mass exodus. Not only does help the local economy, but we also hold fundraisers to fight blight, have an annual Easter party for the kids, and show many visitors some of the creative enterprises happening in the city. With 139 square miles of land in Detroit, there are plenty of opportunities to blend urban life with farm life. In fact, I get visitors from all over the country as well as Canada who come to the urban farms, as Detroit is considered the forefront of urban farming around the world. I am excited to see all the grassroots innovation from the citizens, as well as Michigan State University's recent involvement in Detroit's urban agriculture.

Officially, owning livestock has been illegal in Detroit. Unofficially, there is a moratorium on prosecuting urban farmers until the city comes up with their own guidelines for urban agriculture. But from what I hear, with a few exceptions, most people running the city have no idea what goes on in urban farms or small hobby farms. They wonder what happens with "all the duck sewage" that comes out of my property (currently they have 400 square feet per duck, so there isn't any duck sewage). They have a myriad of other concerns, such as pesticide use, etc., that shows their total ignorance of the purpose of small farms. Jim Johnson, who is behind these new GAAMPs, also shows total ignorance when arguing these new proposals. For instance, 4999 chickens in someone's backyard is something that simply doesn't happen, and I don't think Johnson can come up with one example in real life that even comes close to that.

Detroit may be founded on its factories, but factory farming has not taken root here.

Most urban farms and hobby farms are revolutionizing the way farming has been done over recent decades, and they are returning to organic practices, as well as more humane ways of raising livestock, which usually means fewer animals over a larger space. There is a market for this local food as more people choose to eat organically grown products and animal products from humane sources.

These proposed changes in the GAAMPs would not only limit consumers' choices at the checkout, but they would discourage small farms, and therefore small businesses, which are becoming a burgeoning industry in the state, as well as limiting our individual freedoms and restricting our property rights. I find it ironic that we are allowed to "stand our ground" when it comes to fighting crime, but the trend is to not allow us to "stand our ground" when it comes to the freedom to produce food in a safe and humane manner on our very own property. This, in my opinion, should be an inalienable right.

To tell people to move further into the country is not necessarily the answer either. Most farms, regardless of size, usually rely on another source of income, and these jobs usually require people to be near urban areas. Also, the customers that keep these farms viable live in the urban and suburban parts of the state. Requiring people to reside further on the outskirts would, for all intents and purposes, kill small farms. I know it is up to the individual municipalities to create their own laws regarding agriculture, but knowing that the laws could change, or that one's agricultural property could be zoned residential without warning would discourage people from investing in urban or suburban areas in the first place.

I rely on the Right To Farm Act to protect my business and my way of life in Detroit. It is the one foothold in an otherwise slippery slope of ignorance and corporate control of agriculture, and one of the many reasons I am proud to live in Michigan, and extremely honored to be part of the reinvention of Detroit. I propose that no changes be made to the GAAMPs until local governments are up to speed on some of the great things that are happening in urban agriculture and small farms in Michigan. Thanks for hearing me out, and please visit your local farm!

Sincerely,

Suzanne Scoville

Wilcox, Rhonda (MDA)

From: Becca <sond.hey@gmail.com>
Sent: Wednesday, January 22, 2014 7:47 AM
To: Wilcox, Rhonda (MDA)
Subject: New Changes to RTFA/GAAMP Highly Problematic,

Hi,

I'm writing to comment on proposed changes to the 2014 GAAMPS. I do not approve of almost any of the proposed changes, and as a Michigan voter, I'm confused and concerned. The state claims that they are putting more control in the hands of local governments.

I understand what MDARD is trying to do, but Michigan's zoning laws are very problematic and overreaching, and individuals/families have almost no rights with regards to zoning. Seriously. Even in my small township where everyone is amicable and we all know each other, we have almost no right or power to have our properties rezoned. It's dubious, possibly unconstitutional, and far from democratic, but it is how it is. That's why we need our strong, protective, state-wide Right to Farm Act: since our 30-acre farm is zoned "residential" despite the fact it's been a working commercial farm for 50 years, the RTFA is the only thing that protects us.

I strongly feel this is out of the authority of MDARD as it does effectively create new legal precedents, while contradicting the RTFA as it is written. Additionally, the state's claims don't square properly with the proposed changes, several of which create new laws and restrictions despite lacking scientific evidence or studies.

On an emotional note, I'd like to comment that so many of us Michiganders are POOR AND STRUGGLING in this AWFUL ECONOMIC CLIMATE. Any attempts to make it harder to raise food is making it harder for us. I barely sleep because I'm so worried about rent and bills and money and how I can afford anything, and the state wants to take away protection that allows me to be self-sufficient?

Some of us raise livestock to save money, and some of us want to eat meat or eggs that aren't riddled with hormones or GMOs, and some of us want to raise animals because it's what we've always done. The affordable way to do that is to raise them ourselves. I don't personally have livestock, but I'm made ill by the attempts to take away the rights of those who have animals. My neighbor's dog makes 100x more noise than her chickens.

And of course I agree with those three talking points that keep getting passed around:

1. According to the law, changes to the GAAMPs should be based on scientific evidence; no evidence has been provided that supports the current changes to the Site Selection GAAMPs.
2. According to the law, changes to the GAAMPs should be for purposes of improved public health or the environment; no evidence has been provided that small farms in residentially zoned areas are a threat to public health or the environment.
3. The proposed changes create language in the GAAMPs that contradicts the language of the law (that is, the GAAMPs require zoning to regulate Livestock Facilities while the Law prohibits zoning from regulating them). While the Agriculture Commission has the authority to change the language of the GAAMPs, they do NOT have the authority to change the meaning of the law, and that is what this change attempts to do.

Best,

Becca Sondag
Three Rivers, Michigan

Wilcox, Rhonda (MDA)

From: Dru Montri <dru@mifma.org>
Sent: Wednesday, January 22, 2014 3:54 PM
To: Wilcox, Rhonda (MDA)
Cc: donna_mcclurkan@sbcglobal.net; Christine Miller; Julia Darnton; rebecca@titusfarms.com
Subject: 2014 Draft for GAAMPs for Site Selection and Odor Control for New and Expanding Livestock Facilities
Attachments: MIFMA GAAMP Comments 1-22-14.pdf

January 22, 2014

Michigan Department of Agriculture and Rural Development (MDARD)
Environmental Stewardship Division
P.O. Box 30017
Lansing, Michigan 48909

RE: 2014 Draft for Generally Accepted Agricultural and Management Practices (GAAMPs) for Site Selection and Odor Control for New and Expanding Livestock Facilities

Thank you for accepting comments on the 2014 draft GAAMPs. The Michigan Farmers Market Association (MIFMA) is a statewide, member-based association located in East Lansing, Michigan. Our mission is to advance farmers markets to create a thriving marketplace for local food and farm products. We have been in existence since 2006 and work to support and represent Michigan farmers and farmers markets.

We are writing today because of the concerns some of our farmers market vendor members who raise livestock have with the proposed changes to the GAAMP for Site Selection and Odor Control for New and Expanding Livestock Facilities. Our association's leadership is concerned about the impact these changes may have on our members and, more broadly, on Michigan farmers and farmers markets. Please ensure that the voices of small-scale farmers are heard, considered, and represented in this process as these farmers and livestock producers also critical to the growth of healthy, regional food systems.

MIFMA is willing to work with MDARD, the Review Committee for the GAAMPs for Site Selection and Odor Control for New and Expanding Livestock Production Facilities, and the Michigan Commission of Agriculture and Rural Development to facilitate a conversation with small-scale livestock producers that could be impacted by these changes. Organizationally we believe it is essential for regulations to proceed only when all stakeholders are fairly represented in the dialogue.

On behalf of the Michigan Farmers Market Association, thank you for your careful consideration of our comments.

Sincerely,

Dru Montri, Ph.D.
Director
dru@mifma.org

Donna McClurkan
Policy Committee Chair
donna_mcclurkan@sbcglobal.net



January 22, 2014

Michigan Department of Agriculture and Rural Development (MDARD)
Environmental Stewardship Division
P.O. Box 30017
Lansing, Michigan 48909

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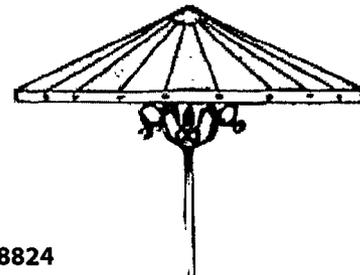
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On behalf of the Michigan Farmers Market Association, thank you for your careful consideration of our comments.

Sincerely,

Dru Montri, Ph.D.
Director
dru@mifma.org

Donna McClurkan
Policy Committee Chair
donna_mcclurkan@sbcglobal.net



480 Wilson Road, Room 172, East Lansing, MI 48824
Ph: (517) 432-3381 Fx: (517) 353-7961
www.mifma.org

Wilcox, Rhonda (MDA)

From: Egypt Mapes <egypt.mapes@gmail.com>
Sent: Wednesday, January 22, 2014 10:14 AM
To: Wilcox, Rhonda (MDA)
Subject: Proposed changes to GAAMPS

Hello,

I am writing to voice my concerns regarding the proposed changes to the GAAMPS regarding farm animal care, livestock site selection, and manure management.

While I understand the necessity of government oversight to ensure public and environmental health standards, and am in favor of stronger oversights for confined animal feeding operations, I am wary of any legislation making it harder for small farms to operate. As both a small farmer and an eater, I recognize the difficulty in producing and procuring healthy, ethically produced food, especially animal products. I am currently able to source my dairy, eggs, and meat from local sources which include my own small, urban meat rabbit herd, but the proposed legislation would force many of these sources to shut down. This would greatly impinge upon my and other's personal rights to healthy, ethical food.

Any legislation which would infringe upon the rights of small farmers and individuals to raise livestock is a threat to our regional food security and to individual food sovereignty. We have the right as farmers to build strong, healthy farm ecologies utilizing diverse animal and plant production systems, and as eaters we absolutely have the right to produce small amounts of animal food for our personal use. While animal production is certainly more challenging in residential areas, I know that it is possible to safely manage small livestock such as poultry, rabbits, and even small sheep and goats in urban and suburban areas. If it is possible to safely raise companion animals such as dogs and cats, how do we not also have the right to a small flock of chickens or a few meat rabbits?

Please, carefully consider the impacts to personal food choices and liberties as well as the economic impact to small farmers when reviewing the proposed changes to the GAAMPS and show support for small integrated farms and homesteaders.

Sincerely,
Egypt Mapes

Wilcox, Rhonda (MDA)

From: kusan.diana@gmail.com on behalf of Diana Gonzalez
<diana@tigerqiakupuncture.com>
Sent: Tuesday, January 21, 2014 11:21 PM
To: Wilcox, Rhonda (MDA)
Subject: changes to the generally accepted agricultural and management practices (GAAMP) and Right to Farm Act (RTFA)

Dear Sirs or Madams,

It is vitally important to me and my neighbors that we retain the right to grow our own food, wherever we live. It is one of the reasons we chose to move to and raise children here in Ypsilanti, MI, having moved from Portland, OR. There is no scientific reason to limit the ownership of some farm animals, such as chickens. They pose no more health or public nuisance than any other pet, such as a cat or dog, and no one is banning those.

These new proposed restrictions are a manipulative illegal authority by the Agriculture Commission to disempower the people of Michigan, in favor of Big Corporate farms that are truly responsible for contaminating our food supply with their profit-driven and disease-ridden practices that do not care about human life. Michigan should not regress into these practices, and should continue to move forward with more environmentally, economically, and socially responsible practices which include backyard food production, gardens, chickens, and bees.

I will vote, canvas, and organize if needed, to ensure that my neighbors and myself are truly represented in our government. And that those at the MDARD do not over-step their legal scope of practice, and over-ride local ordinances and legislation.

Sincerely,
Diana Gonzalez
Ypsilanti, MI

Wilcox, Rhonda (MDA)

From: brentgeurink@gmail.com on behalf of Brent Geurink <geurink@usc.edu>
Sent: Wednesday, January 22, 2014 1:22 PM
To: Wilcox, Rhonda (MDA)
Subject: PUBLIC COMMENT: Generally Accepted Agricultural and Management Practices (GAAMPs)

I protest the draft changes to the GAAMP, specifically the creation of a new Category 4 designation specifically targeting all residential areas as not acceptable sites, regardless of the number of animals.

As a student of urban planning, I am schooled in the importance of zoning as a legal tool to protect the value of property. Separation of uses through zoning is a fundamental component of our society and urban areas. At its best the separation of uses through zoning protects health and wellbeing of residents from truly nuisance activities, such as heavily polluting industries. At its worst, it has been used as a weapon of discrimination. A more common but insidious consequence is the deterioration of diversity and vitality through extraneous restrictions.

Hijacking residential use designations to specifically limit and restrict the right to farm is not acceptable. Small scale gardening is widely accepted as a locally sustainable alternative to industrial agriculture and cross-country or worldwide transportation of food. Likewise, a small flock of laying hens (5 or below, including JUST ONE) offers a local, sustainable, and organic alternative source for food.

As the country becomes more urbanized, with an ever increasing proportion of the population living in cities, it is important that society remains connected to its food supply and the natural world. Small urban farmers continue the tradition in this country of the self-reliant, can do spirit. Such activities provide an opportunity to teach our children that our food comes from the earth, not a grocery store freezer. Small farmers maintain a connection to our society's agricultural past, but more importantly they are establishing an essential path toward a sustainable future.

DO NOT REMOVE THEIR RIGHT TO FARM!

--

Brent Geurink

Master of Planning Candidate, 2014
Dean's Merit Scholar
Sol Price School of Public Policy
University of Southern California

c: 616-446-3339
e: geurink@usc.edu

Wilcox, Rhonda (MDA)

From: hether.jf@gmail.com on behalf of hether jonna frayer <hether@freshfoodfairy.org>
Sent: Wednesday, January 22, 2014 4:49 PM
To: Wilcox, Rhonda (MDA)

I am writing in opposition to proposed changes in the GAAMPs that will outlaw farm animals in residential neighborhoods.

As an urban farmer I take pride in the great services that I can provide to my family and friends in the form of healthy local food. I can take pride that the food that I produce is produced in a sustainable, healthful, and respectful manner.

As a chicken owner I can verify that my small flock is quiet, clean and productive. We live in harmony with our neighbors and share our knowledge freely with all.

The right to produce healthful and sustainable food should be a part of all communities. Legislation should be designed to expand, not limit urban agriculture.

The local food movement is a huge part of our state's food security which will only make Michigan stronger and a more desirable place to live.

Thank you,
Hether Frayer

fresh food fairy
encouraging good nutrition by making fresh food fun!
www.freshfoodfairy.org
269.598.6857

Wilcox, Rhonda (MDA)

From: Katrina Ezbenko <katrinaezbenko@comcast.net>
Sent: Wednesday, January 22, 2014 4:14 PM
To: Wilcox, Rhonda (MDA)
Subject: Small urban farms

Homeowners and land owners have the right to raise animals or grow gardens on their property wherever that might be. My neighbor's dog poop smells but I don't want to ban her from having a dog. My neighbor can legally burn leaves that make me absolutely sick so why shouldn't I be able to raise a chicken or two? Leave small farmers alone. People have the right to grow food.

Sent from my iPhone

Wilcox, Rhonda (MDA)

From: Elle Eche <extralynz@yahoo.com>
Sent: Wednesday, January 22, 2014 4:14 PM
To: Wilcox, Rhonda (MDA)
Subject: We want to preserve Michigan's rights to farm

I am writing to protest any changes in the Michigan's Generally Acceptable Agricultural Practices (GAAMPs) that prevents urban, suburban and small scale farmers from keeping livestock. As long as it is permitted by the city/ordinance in which they live and doesn't disturb the peace of their neighbors, everyone should be permitted to keep their own livestock in order to be sustainable, affordably provide food for themselves and their family and preserve a way of life that is becoming obsolete.

Best Regards,
Lindsey Harnis

Wilcox, Rhonda (MDA)

From: LANE Michelle <michelle.lane@roeper.org>
Sent: Wednesday, January 22, 2014 4:13 PM
To: Wilcox, Rhonda (MDA)
Subject: backyard chickens

Dear Ms. Wilcox,

I am writing so that my voice is heard as a suburban, Michigan citizen who supports the right of individuals with suitable backyard spaces in suburban and urban areas to keep small flocks of backyard chickens. Reasonable limits about the size of the flock are understandable, but I do not support legislation that would bar citizens from raising chickens for their eggs for home consumption. They should be subject to standards that would be in place for any pet owner--noise, cleanliness, etc.--but not prohibited from keeping them.

Thank you,
P. Michelle Lane
Rochester Hills, MI 48309

Wilcox, Rhonda (MDA)

From: Anna Schankowski <schanka@dearbornschools.org>
Sent: Wednesday, January 22, 2014 4:12 PM
To: Wilcox, Rhonda (MDA)
Subject: Michigan Right to Farm Act

To whom it may concern.

I am writing in response to the proposed changes to Michigan's Right To Farm Act. Thank you for taking time to read this letter.

It is agreed that there are needs for some regulations in regards to small farms, such as manure management, animal care and the number of farm animals that one is allowed to have on their property. Those regulations should take in to consideration the amount of land and needs of the animals kept on the farm. **Regulating that number to as few as one farm animal will not only mean the end of urban farming but it could be the end of programs such as the 4-H Youth Development Program.** Urban farming is a huge part of the 4-H organization. The kids will not be able to raise many of the animals that are shown and auctioned off at county fairs all over the state of Michigan.

The Michigan Right to Farm Act does need adjustments but it needs to be done in a manner that will still protect our rights as small, rural and urban farmers. Our 4-H youth have learned so many values about animals, how to take care of them, properly feed and clean them as well as keep them busy with outdoor activities instead of video games. The values that these children learn thru raising animals stick with them throughout a lifetime. Please don't be rush to take that away from my own two children, or away from any of the kids who may be touched by these programs and experiences.

Respectfully,

Anna M. Schankowski
9817 Wheeler Street
Belleville, MI 48111

Wilcox, Rhonda (MDA)

From: Joan Overcash <joanovercash@cox.net>
Sent: Wednesday, January 22, 2014 4:12 PM
To: Wilcox, Rhonda (MDA)
Subject: Support small farmers - not big ag

To:
Michigan Department of Agriculture and Rural Development's Environmental Stewardship Division
protect and extend the rights of urban, suburban, and rural small-scale farming operations throughout
the state

Sincerely,
Joan Overcash

Wilcox, Rhonda (MDA)

From: Patricia Akley <pattiakley@yahoo.com>
Sent: Wednesday, January 22, 2014 4:08 PM
To: Wilcox, Rhonda (MDA)
Subject: SUPPORT small farms in urban cities of Michigan

To whom it may concern,

My name is Patricia L. Akley and I am a life-long resident of Lansing, currently residing at 1916 Beal Avenue, Lansing, MI 48910. I have owned my home for more than a decade and reside with my 7-yr-old daughter, Isabella, who has spastic quad cerebral palsy.

We are writing to inform you, our elected officials, that we SUPPORT small farms, agriculture, and livestock WITHIN the city limits. This is the model of sustainability, as this is where most of the population resides!

We thank you for your time and consideration in this matter. Please continue to allow us access to fresh food, from our own urban homesteads! As a mother of a fully-dependant child, this has made my life easier, and healthier!

Sincerely,
Patricia L. Akley
January 22, 2014 Wednesday 4:08pm

Wilcox, Rhonda (MDA)

From: Lynda Stewart <ljsstewart@gmail.com>
Sent: Wednesday, January 22, 2014 4:09 PM
To: Wilcox, Rhonda (MDA)
Subject: GAAMPs

January 22, 2014 14:09

Please Don't pass a new bill to prevent responsible people like me to raise chickens in the city. I am a responsible neighbor and pet owner. It is not fair to allow a bill to pass that affects everyone in the state of Michigan. Leave it up to local cities and townships. If this law passes, Michigan residents won't be able to afford to buy more land, just to own a few chickens or other small pets. Thank you for your consideration.

Lynda J. Stewart
329 East VanHoesen Blvd
Portage MI 49002-1447
269-349-3178

Wilcox, Rhonda (MDA)

From: JoAnn Schwartz <jams3k@yahoo.com>
Sent: Wednesday, January 22, 2014 4:05 PM
To: Wilcox, Rhonda (MDA)
Subject: Right To Farm Laws

Hello,

I am writing in support of the current interpretation of the Right to Farm law.

I believe everyone should have a right to farm, including urban and suburban residents. A recent mlive.com article quoted Jim Johnson as saying, "it is our opinion that 4,999 chickens on a 50 x 75 plot is not fair to the neighbors." However, most urban farms are not hosting flocks of 4,999 chickens. A small flock of 3-5 birds need not be a nuisance and may provide eggs for more than one family during the summer season. Surely there is room for smaller farms as well as giant agribusiness concerns within the state of Michigan.

Thank you for your attention.

Kind regards,
JoAnn Schwartz
Eastpointe, MI

Wilcox, Rhonda (MDA)

From: Julie Arkison <arkison@joimail.com>
Sent: Wednesday, January 22, 2014 4:02 PM
To: Wilcox, Rhonda (MDA)
Subject: Proposed change to legislation regarding GAAMPS

To Whom It May Concern,

About four years ago I did considerable research on the issue now being voted on. I went to my township and presented what I had learned. My township decided to pass some local ordinances that were actually against the RTFA. I felt that if needed, someone could always go back to the RTFA and over ride what the local ordinances had done. As far as I understand the change that is proposed , I will no longer have this option.

After studying many township laws, each of them are different. Some of them are legal and some are not according to the RTFA. I am concerned that this recent law would allow local township boards more power than necessary especially given that some people on the boards of townships and the ordinance writers especially do not understand the requirements of housing animals and farming. In my community, at least we have people on the board who are sympathetic to that and understand the realities of farming and owning livestock.

I did extensive research to understand the GAAMPS and argued that some of the proposed changes to the ordinances would make it difficult for small 10 to 15 acre horse farms such as mine to work in the future. There for the township was limiting itself from being part of a billion dollar industry. Thus the economic impact of the making ordinances that kept out small horse farms was not good business for the community. Fence restrictions alone (having to be a certain distance from the property line) would limit the amount of pasture for the horses and seriously impact the operation of a small scale farm.

Furthermore, since the GAAMPS are created for large confined animal operations, the regulations do not work for small operations. The 50 animal rule is in favor of confined animal operations and creates a bias for small farms that is unfair. I would not be able to run a horse farm if I needed to buy 40 acres of land in order to have a certain number of animals on the property.

I understand the manure management plays heavily in the picture of managing a certain number of animals on a certain number of acres. I didn't research other animals but the old formula in the GAAMPS about manure output from horses is outdated and incorrect since it is based on draft horses who are twice as large as the average pleasure horse and therefore put out half the amount of manure. Ponies put out even less.

I have owned and operated a horse farm in a on 15 acres of land for 25 years. I am in an agricultural zoned area. There are houses going in around me. I don't know if there are any subdivisions planned . However, under the proposed legislation I would have no way to deal with an unreasonable complaint from an uneducated neighbor.

The rezoning of land for subdivision purposes put small horse farms such as mine at risk . The passing of this kind of law would be an added risk.

There fore, I do not believe that this law should be passed without further discussion and review.

Thank you for your time and consideration.
Julie Arkison
734 429 7286

Wilcox, Rhonda (MDA)

From: Katie <madaboutanimals@gmail.com>
Sent: Wednesday, January 22, 2014 3:59 PM
To: Wilcox, Rhonda (MDA)
Subject: Rtfi

I worry that our small farm currently zoned ag could be changed to residential. That would mean giving up our right to our pursuit of happiness.

Wilcox, Rhonda (MDA)

From: Wendy & Mojo <dancingbug@birchleafdesigns.net>
Sent: Wednesday, January 22, 2014 3:59 PM
To: Wilcox, Rhonda (MDA)
Subject: Oppose GAAMPS Site Selection changes

I am writing to oppose the planned changes in the GAAMPS Site Selection and the resulting outlawing of livestock in residential areas.

Small scale food production can be logical, economical, environmentally friendly, and can feed a lot of people in dire situations.

As the GAAMPS are currently written, they assure that the people operate in a way that does not interfere with neighbors and operations do not threaten health or the environment.

There is no logical reason to change the current wording. It seems as though big Ag has too much money and is greedy for more. It is really not okay to bully around the small farmers who are just trying to feed their families and make a living for themselves.

Thank you,
Wendy Johnson

Wilcox, Rhonda (MDA)

From: Tina Berryer <tberryer@yahoo.com>
Sent: Wednesday, January 22, 2014 3:59 PM
To: Wilcox, Rhonda (MDA)
Subject: GAAMP Committee

On behalf of the Oakland County 4H Poultry Club we would like to express our concerns with possible changes to Michigan's GAAMP. The changes that are being considered will severely restrict the rights of Michigan farmers, particularly small scale farmers. As a supporter of Michigan 4H and farmers in general, we would like to bring to your attention that often times it is the simple "backyard" experience and connection with animals that creates the wonderful lifelong understanding and responsibility of animal ownership. Please do not make any changes and jeopardize the wonderful experience that so many 4H children receive from being able to raise a few chickens, goats or rabbits in their own backyard. Thank you.

Tina Berryer
548 James Lane
Lake Orion, MI 48362

Wilcox, Rhonda (MDA)

From: MerriKay Oleen-Burkey <moburkey30@gmail.com>
Sent: Wednesday, January 22, 2014 3:58 PM
To: Wilcox, Rhonda (MDA)
Subject: Proposed GAAMP draft categories

Dear Sir or Madam:

In reference to GAAMP Site Selection and Odor Control for New or Expanding Livestock Facilities, I oppose the inclusion of Category 4 sites. Factors such as lot size and number of livestock are taken into account by city zoning ordinances.

That level of detail in the regulations should be addressed at the local level, not at the state level. There are residential areas where small numbers of livestock can and are being properly kept for the production of healthy food for local families. Decisions about the appropriateness of such land use should be made at the local governmental level.

Thank you for the opportunity to comment on this proposed change to a GAAMP.

Sincerely,

MerriKay Oleen-Burkey

664 Wynding Oaks

Kalamazoo, MI 49006

moburkey30@gmail.com

Phone: 913-302-1211

Wilcox, Rhonda (MDA)

From: Holton, Jennifer (MDA)
Sent: Wednesday, January 22, 2014 3:58 PM
To: Wilcox, Rhonda (MDA)
Subject: FW: Farm bill loophole

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

From: Dean Simionescu [<mailto:dean.t.simionescu@gmail.com>]
Sent: Wednesday, January 22, 2014 3:53 PM
To: Holton, Jennifer (MDA)
Subject: Farm bill loophole

I urge you to not eliminate the loophole as described in the mlive article for small urban farmers. I want to know that when I eat animal products such as eggs that the chickens were not injected with hormones and not mistreated. Being a college student with no car I must live in an urban setting and my 3 chickens provide me with the protein I need to have a balanced diet to maintain my active lifestyle and the comfort in knowing exactly what I am consuming. My chickens are also heritage breeds and most farmers who sell eggs do not have farms with biodiversity of chicken breeds. Small backyard farmers like me ensure sustaining populations of these rare, dying out animal breeds.

Thank you,

Dean

Sent from my iPhone

Wilcox, Rhonda (MDA)

From: Patrick Barry <patrickjamesbarry@yahoo.com>
Sent: Wednesday, January 22, 2014 3:57 PM
To: Wilcox, Rhonda (MDA)
Subject: Right to Farm Act

Dear Sir or Madam

I oppose any restriction or re-definition of Michigan's Right to Farm Act. These proposed changes are being put forward without any scientific data to back them up and there is no evidence has been provided that supports the current changes to the Site Selection GAAMPs.

There is no evidence that small farms in residential areas have any negative effect on health in that area, or that there is a negative environmental impact to small farms in residential areas.

The proposed changes create language in the GAAMPs that is contradictory to the language of the law.

Please support the right and freedom of small farms in Michigan.

Thank You for your time

Patrick Barry

"At least once every human should have to run for his life, to teach him that milk does not come from supermarkets, that safety does not come from policemen, that 'news' is not something that happens to other people. He might learn how his ancestors lived and that he himself is no different--in the crunch his life depends on his agility, alertness, and personal resourcefulness."

Robert A. Heinlein

Wilcox, Rhonda (MDA)

From: City Girls Soap <info@citygirlssoap.com>
Sent: Wednesday, January 22, 2014 3:54 PM
To: Wilcox, Rhonda (MDA)
Subject: Michigan right to farm act.

Good Afternoon Sir or Madam,

I am writing in regards to the proposed change to the Michigan Right to Farm Act.

America was built on the agricultural industry, Americans have sustained themselves in good times and hard times since the Great War of 1918.

We, as citizens are not threAt to large farms. If we choose to go out and collect eggs from our own birds it doesn't mean we dont support our local grocery, our local farmers. It means we choose to teach our kids about where their food comes from. The chickens eat bad bugs, fertilize our land and make no noise.

Please do not take away a very simple right that truly doesn't cause any harm.

Remember our voice is our vote! We remember every single act you make that can be interpreted as "stomping on the little guy". We are tired of losing our rights to big business! We may not be able to speak with our pockets but we sure can with our voice and vote!!

Do not let them remove the right to farm act!

Amy McIntire
City Girls Soap
[Www.CityGirlsSoap.com](http://www.CityGirlsSoap.com)

Wilcox, Rhonda (MDA)

From: LANE Michelle <michelle.lane@roeper.org>
Sent: Wednesday, January 22, 2014 3:51 PM
To: Wilcox, Rhonda (MDA)
Subject: backyard chickens

Dear Ms. Wilcox,

I am writing so that my voice is heard as a suburban, Michigan citizen who supports the right of individuals with suitable backyard spaces in suburban and urban areas to keep small flocks of backyard chickens. Reasonable limits about the size of the flock are understandable, but I do not support legislation that would bar citizens from raising chickens for their eggs for home consumption. They should be subject to standards that would be in place for any pet owner--noise, cleanliness, etc.--but not prohibited from keeping them.

Thank you,
P. Michelle Lane
Rochester Hills, MI 48309

Wilcox, Rhonda (MDA)

From: Mulberry Farm <mulberryfarm@wildblue.net>
Sent: Wednesday, January 22, 2014 3:50 PM
To: Wilcox, Rhonda (MDA)
Subject: Michigan RTFA - Proposed Site Selection Changes

To Whom It May Concern:

I would like to state my opposition to the proposed changes to the Michigan RTFA, specifically the proposed Site Selection changes in the GAAMPS.

We have a small farm (7 acres) in SW Michigan where we have a small herd of dairy goats, a Berkshire sow that has a couple of litters per year where we sell feeder pigs as well as raise out a couple of pigs for meat. We raise a couple of Angus for beef where we sell half and quarter sides, and we have a handful of laying hens. We comply with GAAMPS as they are now written. Most of the goat milk goes to a soap and lotion business I have where I sell at a year-round farmer's market in South Bend, IN. I sell herd shares on a limited basis and the balance is used to raise out the hogs. It is a small business that not only subsidizes my husband's income, but allows people a choice in what they are putting in and on their bodies.

We live in an area that is zoned Rural Residential. If the proposed changes on Site Selection go through, we would no longer be able to farm, would make our property useless as well as take away income that is sorely needed in these hard economic times. Additionally, by putting zoning requirements back in the hands of a township, town, or city, that assumes that the township has zoned areas in a responsible and appropriate manner. I do not believe this is always the case. All around us, zoning is Agricultural. The 1/2 mile strip of road where we live is zoned Rural Residential only because there are 8 houses on this side of the road. Most of these homes have acreage of 10+ acres behind them. To the south, north, east, and west of this zone, is all agriculturally zoned.

We are responsible citizens who want to continue to farm on a small-scale basis. Please do not make the proposed changes to Site Selection. Thank you.

Sincerely,

Cindy Plantz
Mulberry Farm
Cassopolis, MI

Wilcox, Rhonda (MDA)

From: Constance A. Colandrea <ccolandrea@fv-operations.com>
Sent: Wednesday, January 22, 2014 3:49 PM
To: Wilcox, Rhonda (MDA)
Subject: urban farming in Detroit

Sir

I have seen what marvelous redevelopment of vacant lots and abandoned homes have occurred when entrepreneurs are allowed to develop urban farms. There is definitely not only room and the need for agricultural development, but small animal development as well. Before any changes are made to exclude these endeavors, a study should be undertaken to fully grasp the value of these urban farms not just for the farmer but the communities they are located in as well. Previously these were properties no one wanted and now they sustainably produce food and good will in the city of Detroit and I am sure other areas of the state. Do not make assumptions. Visit and observe. Poll the communities surrounding these farms. Lack of action is better than reaction. Think this through and help create a win win situation.

Constance Colandrea

Wilcox, Rhonda (MDA)

From: Amy Cox <aacox67@hotmail.com>
Sent: Monday, January 20, 2014 12:13 PM
To: Wilcox, Rhonda (MDA)
Subject: Do Not Dismantle RTFA

To whom it may concern:

The Michigan's Right to Farm Act should be preserved. I am a resident of a small sub-urban community in Michigan and I grow produce in my yard. I would like to eventually have a bee hive and about 2-3 chickens. I don't necessarily want to have a bee hive to produce my own honey, but I would like to provide a space for bees to inhabit without the threat of pesticides, herbicides, fungicides, or other chemicals that pose a threat to them. Without honeybees, human survival is threatened as about 90% of our plant based food needs to be pollinated. I also would like to raise a couple of chickens to provide myself and my family with amazingly delicious organic eggs. (If you have never tasted the difference between grocery store eggs and farm fresh eggs, then I encourage you to do so. There is a huge difference.) I have done much research into this and also grew up on a chicken farm. I have a beautiful perennial garden and want to use the chicken droppings as compost in my own garden, plus I want be able to eat eggs that come from chickens that are well treated and eat only organic materials. I want to teach my own children about being a good citizen, show them where food comes from and how to be a bit more self-sufficient.

Farming practices should be shared and encouraged for every day citizens who live in cities, big and small. When people grow food, there is always extra, which encourages sharing among neighbors and serves to strengthen community bonds. There are so many beneficial intangibles related to this. For example, I know so many people who, after beginning small farming practices, become more healthy, lose weight, start eating better. This does much for productivity of a population, as well as reducing health care costs that are passed on to taxpayers. In addition, many people who start doing a bit of small scale farming also develop some small entrepreneurial enterprise, which is good for economical growth, as well as guiding citizens toward becoming more ingenious and creative.

I fully believe if we helped Michiganders become more in-touch with our roots with the land, that we could create a booming cottage foods industry, create tourism around this industry, etc. The Amish in Lancaster County, PA have something going for themselves. We could do the same here in Michigan and local farming and greater awareness of local farming could quite possibly create a culture that allows our state to do just that.

Please do not dismantle or weaken the Michigan's Right to Farm Act

Thank you
Amy A Cox
Citizen of Flushing, MI 48433
Teacher at Mott Middle High School
736 Cloverland Drive
Flushing, MI 48433

Wilcox, Rhonda (MDA)

From: steve bellew <bellewsart@yahoo.com>
Sent: Wednesday, January 22, 2014 3:44 PM
To: Wilcox, Rhonda (MDA)
Subject: Michigan Right to Farm act

To those few who have the power to change the lives of Many, Please protect the Michigan Right to Farm act! Let our neighbors decide what is offensive to their eyes, ears and nose. Taking the rights of and individual to feed their families while abiding by local ordinances should be a plus for state government. Please don't let big agra businesses form laws for you and me. It is not the governments responsibility to feed its people, please make sure it is not the governments fault its people don't get fed. Pleading sincerely , Steven Bellew

Wilcox, Rhonda (MDA)

From: tinyblackdress@aim.com
Sent: Wednesday, January 22, 2014 3:46 PM
To: Wilcox, Rhonda (MDA)
Subject: regarding the unacceptable proposed revisions to the Generally Acceptable Agricultural Practices

To whom it may concern regarding the proposed revisions to the Generally Acceptable Agricultural Practices,

Remember how our government encouraged us to grow Victory Gardens and keep chickens in every backyard during World War II? By keeping chickens in our backyards, we are cutting factory farmers bottom-line (thank God!)

The proposed changes are NOT ACCEPTABLE.

What they are trying to do is to take away Right to Farm protection from people trying to be self sufficient.

WE DO NOT ACCEPT THESE PROPOSED CHANGES.

Thank you,

Julia Steinberg

Wilcox, Rhonda (MDA)

From: Dane Guzzetta <seekerprod@gmail.com>
Sent: Wednesday, January 22, 2014 3:46 PM
To: Wilcox, Rhonda (MDA)
Subject: Re: Site Selection GAAMPs revision

I am writing to strongly urge that the MCARD not change the Site Selection GAAMPs.

3 Years ago I purchased a home on a 14 acre parcel of land with a small barn. I purchased this property with the intention of planting a vegetable garden and raising some animals for meat for personal use. My property is zoned rural residential.

I don't anticipate any problems of objections from my neighbors. But if there are, I fully expect that I can rectify any objections amicably at that time. However, if I am not able to, I would be offended if my freedom to use my property in a responsible manner would be compromised by a weakening of the Right To Farm law.

I am 67 years old and am very concerned about this. Please do not compromise my right to grow some healthy vegetables and meat.

Thank you for your consideration.

Respectfully,

Dane Guzzetta
2530 N. Lake Pleasant .Rd.
Hillsdale, MI 49242

Wilcox, Rhonda (MDA)

From: Gary Bright <odor1@wowway.com>
Sent: Monday, January 20, 2014 2:37 PM
To: Wilcox, Rhonda (MDA)
Subject: Comment: MDARD

To the Chairpersons of the GAAMP's. My comments are made as personal opinion. Looking back in time before the WWII our soils in the U. S. were abundant with minerals and nutrients that promote good healthy crops. Then came the War. Immediately after a series of chemicals grew from that war and we started to spray our farmlands with it and never stopped. Little by little the experts are crying out that some of those chemicals are contaminating our food chain. Not just because of the chemicals alone, but including other practices such as untreated manures, sewage sludge (as a fertilizer) ..

This message is really concerned with sewage sludge being spread on farmland for fertilizing. In 1971 a person in Scotland tested for 15 years (1986) with land application of sewage sludge (biosolids). At the end of His testing He determined without reservation that; The heavy metals that are present, lead, copper, nickel, zinc and cadmium had been taken up by the plants and He then concluded, **"Contamination of soils with a wide range of potentially toxic metals following Application of sewage sludge is therefore virtually irreversible"**.

In other words, the heavy metals don't wash out of the soil, they enter the food chain, and may contaminate not only crops, but also grazing animals.

Of the top ten states responsible for **toxic discharges** to public sewers in 1991, Michigan took first prize with nearly 80 million pounds, followed by New Jersey, Illinois, California, Texas, Virginia, Ohio, Tennessee, Wisconsin and Pennsylvania.

BIOSOLIDS MAY CAUSE CANCER! After WWII cancers have increased progressively until today 1 in 8 women will contract breast cancer. 1 in 8. When it comes to kids contracting autism, its 1 in 80. Can you imagine. 1 in 8 women with breast cancer. What a business there must be in treating cancer. Hospitals, pharmacies, Doctors, Nurses, treatment centers, pharmaceutical manufacturers and the list goes on.

My comment is simply this: **Who cares!** We had access to a 15 year study done In 1986 that proved the food chain was being contaminated with dangerous compounds and yet who the hell every heard of this study? And why not? Do we have to function from the all mighty dollar when it comes to disease prevention? Apparently.

Michigan's Farm Policy Makers could (think out of the box) determine if Biosolids are land applied, at least require it to be **COMPOSTED** first under rules that best reduces and in some cases eliminates harmful compounds.

Waste Water Treatment Plants will try to sell the notion that when they add "Lime" it reduces pathogens (disease) to acceptable levels. That's a bunch of hog-wash. Not as good as composting for at least 5 days with consistent temperatures not less than 135 degrees.

EPA has about 28 compounds they regulate when it comes to biosolids. What about the other 72+ compounds they don't regulate. As I said earlier, all this is my opinion derived from reading on the subject for years. The more I learn the more I wonder WHO OWNS EPA ?

Michigan regulating Agencies-----The best of luck in your duties.

Gary Bright (586-201-9495) Odor1@wowway.com



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