

MICHIGAN DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT

PUBLIC INPUT MEETING REPORT

GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES

Public Input Meeting Held on October 1, 2020

Pursuant to the Michigan Right to Farm Act, (Act 93 of 1981, MCL 286.471 *et seq.*), the Michigan Commission of Agriculture and Rural Development may define Generally Accepted Agricultural and Management Practices (GAAMPs) developed with assistance by the Michigan Department of Agriculture and Rural Development and with written recommendations from Michigan State University's College of Agriculture and Natural Resources, Extension Service, and AgBioResearch, as well as the United States Department of Agriculture's Natural Resources Conservation Service and Farm Service Agency; the Michigan Department of Natural Resources and other professional and industry organizations. In addition to public comment at Commission meetings, the Commission asked the Department to hold a public meeting to provide an opportunity for the public to comment on proposed changes to the GAAMPs. This meeting occurred on October 1, 2020. Due to COVID-19, the public input meeting was conducted virtually through Microsoft Teams to protect the health of the public and staff.

Present from the Michigan Department of Agriculture and Rural Development: Michael Wozniak, Olivia Turrubiates, Meredith Smith, Jay Korson, and Brad Deacon as hearings officer. Commissioner Dru Montri also attended.

Information about this meeting was released to the public and media on September 8, 2020. Media organizations as well as food, farm, environmental, conservation, legislative, and other organizations and individuals were notified. Copies of proposed changes to the GAAMPs were also posted on the Michigan Department of Agriculture and Rural Development website.

All GAAMPs are developed and reviewed by multi-agency Task Force Committees which are chaired by Michigan State University faculty. GAAMPs are then presented to the Michigan Commission of Agriculture and Rural Development for consideration and adoption under the authority of the Michigan Right to Farm Act. Since their initial adoption, each set of GAAMPs has undergone annual review by the respective Task Force committees, which include scientists and others with expertise, education, and knowledge in the field. The Chair of each Task Force gathers comments from committee members and interested stakeholders and then makes recommendations for revisions of the GAAMPs to the Michigan Commission of Agriculture and Rural Development. The Commission ultimately has the authority to approve, amend, or reject those recommendations.

This meeting was held to receive public comment on the 2021 proposed drafts of the Generally Accepted Agricultural and Management Practices for:

- Manure Management and Utilization
- Care of Farm Animals
- Site Selection and Odor Control for New and Expanding Livestock Facilities
- Farm Markets

The GAAMPs regarding the Nutrient Utilization, Cranberry Production, Irrigation Water Use, and Pesticide Utilization and Pest Control have no proposed changes for 2021. However, comments were welcome on any provisions of any of the GAAMPs.

The deadline to receive written comments was 5 p.m., October 7, 2020.

The following members of the public attended the public input meeting:

- Melanie Rossman

Ms. Rossman shared her frustration with manure application in her area. She requested that the GAAMPs require injection and immediate incorporation of liquid manure.

The public input meeting began at 9:02 a.m., and concluded at 9:41 a.m.

Bradley N. Deacon

Bradley N. Deacon
Hearings Officer
October 20, 2020

MICHIGAN DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT

**GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES (GAAMPs)
PUBLIC COMMENT FORM**

Date: September 14, 2020

Name: Mark & Melanie Rossman

Address, City, State, Zip: 1296 Litchfield Rd, Litchfield MI 49252

Email Address: mmrossmancenturytel@gmail.com

Phone Number: 517-474-2355

Set of GAAMPs being addressed (Please use a separate form to comment on other GAAMPs)

<input checked="" type="checkbox"/> Manure Management and Utilization	<input type="checkbox"/> Irrigation Water Use
<input type="checkbox"/> Site Selection and Odor Control for New and Expanding Facilities	<input type="checkbox"/> Pesticide Utilization and Pest Control
<input type="checkbox"/> Care of Farm Animals	<input type="checkbox"/> Cranberry Production
<input type="checkbox"/> Nutrient Utilization	<input type="checkbox"/> Farm Markets

Describe specific changes that should be made to the indicated GAAMPs:

Require immediate incorporation/injection of all liquid manure applied to fields, irregardless of whether it is being applied to wheat stubble, other crop residue or by a no-till farmer. The current GAAMPs for manure application on wheat stubble especially provide absolutely NO relief or resolution to neighboring properties from the repulsive stench and horrendous amount of flies created by spreading decomposing, rotten manure, especially in the hot, humid summer months by an inconsiderate farmer.

We have the right to fresh air and to comfortably enjoy our home and property but cannot do so because of one neighborhood farmer, who has literally turned our lives upside down since August 10th with his poor manure spreading practices, spreading on the most excessively hot, humid days, weekends included! Then after a complaint was filed with the Michigan Right To Farm office for the stench and excessive flies, he proceeded to come back every couple days and spread more manure in retaliation, just to drag it out longer. We rely on open windows for ventilation of a 125+ year old farmhouse as do other neighbors who do not have central air either. Because of the stench, we are forced to swelter in our homes and can't go outside either because of the flies and horrendous odor.

Today, this same farmer started going to another neighborhood farm not owned by them and hauling liquid manure from that farm to a field adjacent to our home, spreading on corn stubble where they just chopped silage last week. He has hundreds of acres of corn stubble he could spread manure on but he chooses to spread as close to us as possible, knowing full well of the impact it has on our lives and wellbeing. We literally were able to start sleeping in our upstairs bedrooms just last week for the first time since August 10th as the stench south of us finally subsided enough that we could open the windows again! Now it is directly east of us and we are forced to shut the windows and swelter again to avoid the stench for who knows how long?

One person should not have the power and means to disrupt an entire neighborhood's lifestyle for weeks on end like this. There is no give/take with this farmer because of the way the current GAAMPs are written and his claim to be a no-till farmer. How this farmer can be considered environmentally friendly and supposedly verified as such is beyond us. There is nothing friendly or neighborly about his farming practices. He could do many things differently to eliminate the obnoxious odors and flies problem but refuses.

Send comments with any supporting attachments to MDA-Right-To-Farm@michigan.gov

Ferry Farms started spreading manure across the road in middle of field on 8/10/20 or 8/11/20.

Tuesday 8/11/20:

High Temperature: 84

Text sent to Scott Ferry requesting incorporation advising we don't have central air and smell comes in house at night.

Wednesday 8/12/20:

High Temperature: 85

Spreading continues. Greenheaded flies begin congregating in yard trying to get into house/garage. Started swatting flies in the house. Smell getting worse. Unable to sleep in upstairs bedrooms due to excessive heat buildup from closed windows.

Thursday 8/13/20:

High Temperature: 87

Still spreading at 4:30-5:00 p.m. in hot afternoon sun when Melanie arrived home from work. Getting closer to front of field and our house/yard. Swatted big greenheaded flies in house all evening. Stench is constant & obnoxious outside. Unable to sleep in upstairs bedrooms due to excessive heat buildup from closed windows.

Friday 8/14/20:

High Temperature: 91

Still spreading at 4:30-5:00 p.m. in hot afternoon sun when Melanie arrived home from work. Now spreading directly across road from house/yard. More flies than ever inside and outside house. Stench is unbearable outside in yard for Senior Photo shoot. Photographer struggled entire session. Stench penetrating closed windows and doors of house. Unable to sleep in upstairs bedrooms due to excessive heat buildup with windows closed. Text sent to Scott Ferry inquiring what his plan is and advising he's not being neighborly or considerate spreading it right under our noses, knowing how much it aggravates Melanie's asthma & breathing.

Saturday 8/15/20:

High Temperature: 87

Received call in a.m. from Scott Ferry advising his family has spread manure across the road there for years and he had no intentions of incorporating it but we could do so with our equipment at our expense. Said he was done spreading by the road & would be spreading in far back of field. Yet, more manure was spread in the afternoon directly across from house and as close to road and our house as possible. Stench is unbearable inside the house and going outside is out of the question. Had to cancel landscaping project planned for Saturday morning. Swatted flies all day and evening. Text sent late in day to Scott advising his family (father) never planted wheat across the road, only corn. Therefore when his family hauled shit there in years past, it was NOT in hot humid July and August when people are outside and windows are open. Told him he had other shit-covered fields chiseled, he could do same with this one, especially knowing the effect his actions or lack thereof have on others. Received text response back apologizing for our frustrations and wanting to know what else he could do to help us understand his farming practices. Our response was "Nope they suck, we don't need to know anything more." Unable to sleep in upstairs bedrooms due to excessive heat buildup with windows closed and penetrating smell throughout house. Gathering of 7 ladies at the lake on back side of our farm north of manure site were subjected to what they thought was a sewer backup until told differently.

Sunday 8/16/20:

High Temperature: 84

Wind direction changed so we could be outside during the day but as soon as the wind speed died & sun went down, the stench is unbearable again. No spreading occurred. Flies are ridiculous. Unable to sleep in upstairs bedrooms due to excessive heat and smell.

Monday 8/17/20:

High Temperature: 84

Stench still unbearable. No spreading occurred. Flies are ridiculous. Unable to sleep in upstairs bedrooms due to excessive heat and smell.

Tuesday 8/18/20:

High Temperature: 84

Came home from work to see more manure spread in front of field, again directly across from house and adjacent to drainage ditch that goes into creek that goes to Quaker Lake. Crazy amount of flies. Daughter's friend came to lake to kayak with daughter in evening. On the lake, tells daughter our farm stinks. Daughter explained the problem to her, that it's not our farm. Unable to sleep in upstairs bedrooms due to closed windows and smell.

Wednesday 8/19/20

High Temperature: 79

Someone from Ferry Farms (probably Scott Ferry himself) entered manure field in the morning with utility loader tractor and proceeded to scrape and pull manure back away from the roadside ditch but not the drainage ditch. Horrible stench remains with crazy amount of flies. Unable to sleep in upstairs bedrooms due to closed windows and smell. No spreading occurred to our knowledge.

Thursday 8/20/20:

High Temperature: 84

Spread manure again this morning directly across road from house. Stench remains horrific. Flies all over the place. Still unable to sleep in upstairs bedrooms due to closed windows and smell.

Friday 8/21/20:

High Temperature: 87

No field activity directly across road from house. Stench remains horrific in the evenings. Flies are still trying to get in the house and garage. House is sweltering during the day without ventilation. Still unable to sleep in upstairs bedrooms due to heat buildup from closed windows and smell getting increasingly worse in the evenings when the wind dies down.

Saturday 8/22/20:

High Temperature: 89

No field activity today. Stench remains horrific in the evenings. Flies are still trying to get in the house and garage. House is unbearably hot today. No ventilation again. Still unable to sleep in upstairs bedrooms due to heat buildup from closed windows and smell gets increasingly worse in the evenings when the wind dies down.

Sunday 8/23/20:

High Temperature: 88

No field activity again today. Stench is horrific, especially in the evening. Flies are still out of control. House is terribly hot again today. Not able to open windows due to smell. Still unable to sleep in upstairs bedrooms due to heat buildup from closed windows. Horrific smell picked up again in the evening when the wind died down.

Monday 8/24/20:

High Temperature: 91

No field activity again today. Stench is still ridiculously bad. Flies everywhere. Opened windows for a couple hours in afternoon but had to shut as smell came rolling in early evening. Still unable to sleep in the upstairs bedrooms due to heat buildup from closed windows. Smell remains unacceptable in the evenings when the breeze quits blowing.

Tuesday 8/25/20:

High Temperature: 83

Received phone call from Jay Korson of MDARD-RTF advising nothing wrong with what Ferry is doing according to GAAMPS because it is a field of wheat stubble! Unbelievable that he has that much right to disrupt our lives for 2 full weeks now. Korson found nothing amiss because Ferry had come down and raked all the manure back from the roadside before he arrived. Stench is still there. Still have to shut windows at dusk as smell rolls into house. Flies are ridiculous. All we do is swat and spray all evening long.

Wednesday 8/26/20

High Temperature: 92

Smell remains atrocious and flies in house/garage are filling strips faster than we can change them. Still unable to sleep in upstairs bedrooms due to heat buildup from closed windows. House is terribly hot with no ventilation.

Thursday 8/27/20:

High Temperature: 94

Another ridiculously hot day in a sweltering, stinky environment full of flies. Still unable to sleep in upstairs bedrooms due to heat buildup. Stench has not subsided at all. Flies flies & more flies (nasty big greenheaded ones) are everywhere, inside house & garage.



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

October 1, 2020

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 (MFB) regarding the annual review of the Generally Accepted Agricultural and Management Practices (GAAMPs) as developed under the authority of the Michigan Right to Farm Act (MRTFA), 1981 PA 93 as amended. We believe Michigan's Right to Farm Act is the model for our country. The Act has allowed all sectors of 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, on behalf of our more than 41,000 farmer members.

This year we only have comments on the Site Selection and Manure Management GAAMPs:

Site Selection

- We strongly oppose language on page 12 requiring 250-foot setbacks for manure storage changes and installations from neighboring non-farm residences regardless of the distance from the storage structure to the farm's property line. While farmers have control over where and how close to a property line they install or change manure storage structures, they have no control over where a neighbor may choose to build a non-farm residence. While there is an exemption from this standard for established setback distances by previous manure storage or facility components, the setback language itself is still inappropriate. Under this non-farm residence setback standard, farmers may purchase property with the careful consideration of property line setbacks for future manure storage installations or changes, only to have those plans interrupted by a non-farm residence being built near the property line before the farm's storage installation begins. Property line setbacks for new and expanding farms and installations or changes to manure storage structures, as proposed on page 13, already take into account the need to minimize offsite odor nuisances. This is made clear by the tables describing increasing property line setback distances for farm and manure storage structures based on the increasing number of animal units, on pages 7-10 and 13. An additional setback standard for non-farm residences is therefore unnecessary and likely to put farms out of compliance with the GAAMP standard due to events out of their control. We therefore recommend **striking** the following from the 2021 GAAMP: ~~“All manure storage structure changes and installations at existing livestock facilities must be at least 250 feet from non-farm residences or no closer than the established setback distance.”~~

- We recommend amending the language on page 13 requiring conformance with the Manure Management and Utilization GAAMP for manure storage structure changes and installations. GAAMPs may refer to other GAAMPs for more information, but it is inappropriate for the standard under one GAAMP to require conformance with another. We recommend this language be amended to be consistent with other GAAMPs' references for more information, such as the language found in the Manure Management and Utilization GAAMP on pages 7 and 8, so the Siting language reads: "For additional guidance on Manure storage structure changes or installations, refer to must-be-in conformance with the Manure Management and Utilization GAAMPs; Construction Design and Management for Manure Storage and Treatment Facilities section."

Manure Management

- We recommend amending language on page 9 referring to farmstead and field manure stockpiling. While farmers have control over where and how close to a property line they install or change structures to support farmstead stockpiling such as concrete or asphalt pads recommended in this standard, they have no control over where a neighbor may choose to build a non-farm residence. Under this non-farm residence setback standard, farmers may purchase property or plan to install stockpiling structures with the careful consideration of property line setbacks, only to have those plans interrupted by a non-farm residence being built near the property line before the farm's stockpiling structure begins. We therefore recommend amending this statement to read: "Unless a tarp, fleece blanket, or straw cover is maintained, manure stockpiles need to be kept at least 50 feet away from property lines or 150 feet away from non-farm homes." Similarly, on page 9, we recommend amending the language in the field stockpiling standard to refer to property line setback instead of non-farm residence setbacks, to read: "Proximity to surface water, field drainage, predominate wind direction, field slope and applicable conservation practices should be factored into infield manure stacking locations. Manure stockpiles need to be kept at least 150 feet from non-farm homes. Manure stockpiles also need to be kept at least 150 feet from surface waters or areas subject to flooding unless conservation practices are used to protect against runoff and erosion losses to surface waters."

We support the proposed changes for the rest of the GAAMPs. Thank you for your consideration of these comments. Please call us with any questions.

Regards,



Matthew D. Kapp
Government Relations Specialist



Laura Campbell
Manager, Agricultural Ecology Department

MDARD-rtf

From: James DeYoung <james@cjdfarmconsulting.com>
Sent: Wednesday, October 7, 2020 11:35 AM
To: MDARD-rtf
Subject: Site Selection GAAMPs Comments

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I am a farm consultant and my firm has been developing siting applications for over 15 years. We have clients all across the state, and we serve farms of all sizes. I serve on the Manure Management GAAMPs task force, and I served on a sub-committee to study the setback distances required for new and expanding manure storages as they are handled in the Manure Management GAAMPs.

While I agree with the intent of these GAAMPs for Site Selection, I believe that unless something changes, they are not going to be utilized in the future. It is my opinion that the site selection process for expanding farms is becoming too restrictive. As counties and townships allow residential encroachment into land zoned for agricultural use, it is becoming increasingly difficult to find good locations that meet all of the criteria for the siting GAAMPs and other regulations that affect farms. However, that task is simple compared to trying to find a location for a new farm. In order to build a new farm, the setbacks from property lines require someone to own an entire section of land to allow enough space for the rest of the buildings, storages, and ancillary farm structures.

My company typically develops several siting applications each year, but we are rarely taking them to completion because it is becoming impossible to meet all of the requirements for existing farms who want to expand. In particular we have been struggling with the number of houses that have been allowed to encroach on the farm. This causes problems for the farm when they want to replace an aspect of their farm to benefit the farm's efficiency, environmental stewardship, or some other factor. However since there are so many houses allowed to be constructed in rural areas, the farms can no longer comply with the Siting GAAMPs because there are too many houses within the odor plume or within the half-mile or quarter mile distance as specified in the siting application.

We understand that there are options for the farm to get a signed variance for houses in the odor plume, or to request reductions in setbacks, but we have been finding home owners more reluctant to sign anything lately. The neighbors may not have a problem with the farm's current size or odors, but they are not willing to give up their rights as a property owner for something a farm may do in the future. This also impacts the future value of their house and property and they are not willing to take that hit. They have no idea if the changes to the farm will impact their home or not.

We also know that there are new technologies available for odor control. We encourage their installation when appropriate. Air scrubbers for swine barns, floating manure storage covers, digesters, and biofilters have all been proven to be effective, but they add significant cost to the project and require a significant investment in maintenance and upkeep. While farms may be willing to utilize these technologies for new construction, they don't always fit an expanding farm's needs because it is difficult to fit the round pegs into the existing square holes. That limits a farm's ability to expand while still being a good neighbor. These technologies may make sense, and a farm would like to implement them, but it becomes impossible when there are many smaller barns (as on existing/expanding farms) that are part of the farm's legacy.

Our consulting firm has had 10-15 farms in the past two years that have put off expansion plans or plans to modify their existing facilities due to these concerns. A good example is one of our dairy clients that has been preparing over the last

3-4 years to become a CAFO by upgrading all of their manure storages to meet the current standards, eliminating contaminated runoff areas, replacing old barns, and developing an efficient and well planned out farm. But the proximity of the residential development that has been allowed to occur around them will result in immediate non-compliance with the Site Selection GAAMPs, even though they have been operating as a dairy in this same spot for over 40 years. The farm can't afford to purchase all of the land around them (it may not even be for sale if they could raise the funds). The town has just been allowed to grow up around them and they would have over 40 houses within a half mile and at least 13 in the odor plume. The majority of those houses have built into the odor plume in the past 10 years. Even though the farm is doing a much better job with their manure, facilities, and environmental footprint, they will be found to not be in compliance and that will possibly open them up for a lawsuit from someone who moved into the neighborhood and doesn't like the smell.

Something that was supposed to occur by following the GAAMPs is that farmers were supposed to be given protection under the Right to Farm Act. However they do not feel like they are being protected, instead they feel like they are doing all the work, but then get told that they don't comply due to some technicality, or when someone new moves into the neighborhood. To my knowledge, this hasn't resulted in any legal action but it does put all of the effort and cost on the farm's when it is entirely legal for their neighbors to encroach closer to their farm which in effect boxes them in. The farms have no ability to expand due to the actions of others. It doesn't seem right that they are giving up their rights in order to comply with the GAAMPs while others are not held to the same standards.

I believe we are going to see fewer and fewer applications for site selection approval. In fact, I believe if we were to look at the history of this program, we are already seeing a significant drop in applications for siting. I believe that the Site Selection GAAMPs have become too restrictive for farmers to be able to use them. At least they are restrictive enough that the farms are doing the math to see that it doesn't make financial sense to go through with the application. This is especially true when the process shows the farm that there is no way that their current farm would comply and therefore an expansion would not comply either due to no fault of their own, but due to the actions of their property neighbors and their local government.

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MDARD-rtf

From: Berschback, Dana <berschbackd@washingtontwpmi.org>
Sent: Monday, September 14, 2020 12:26 PM
To: MDARD-rtf
Subject: Pest Management

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Good afternoon,

I just read through some of the proposed changes and I was wondering if I could offer a suggestion for an item that has come up locally in Washington Township.

I completely support all of our local farmers and agricultural tourism businesses and know how everyone has had to evolve not only because of COVID but in general over the past several years.

We are fortunate to have so many operating orchards in our community and just like in any developing community some of them now have subdivisions surrounding what once was open land.

We have (I am sure many communities also share the same issue) a lot of deer and I know what havoc they can place on farmers crops and land and I know and support the efforts needed to secure the area and manage the deer from gaining access.

A few months ago, we had a local orchard install a fence to manage this issue and obviously there is always more to the story (the neighboring subdivision was trespassing onto the orchard and even in some cases dumping items on their land) but it created a number of upset residents wanting to know why the Twp could not regulate the height and type of fencing. I searched online to try and find a section I could reference because I knew it was out of our jurisdiction based on the intent for the fencing, and I only could find suggestions for the height to keep the deer out and what was commonly used. I was unable to locate an actual standard (if there is one that I missed please let me know) and I wondered if there was anything you could assist with that would or could possibly set a standard or even a review process with you that sends a notification to the local jurisdiction so we are aware of what is going on since we end up getting the calls once something starts.

Again just some suggestions as well as looking for guidance on this topic.

Any information would be greatly appreciated and thank you in advance for your time.

Dana Rose Berschback

Planning & Zoning Administrator
Charter Township of Washington
57900 Van Dyke
Washington Township, MI 48094
office: 586-677-4222 cell: 586-703-0304

MDARD-rtf

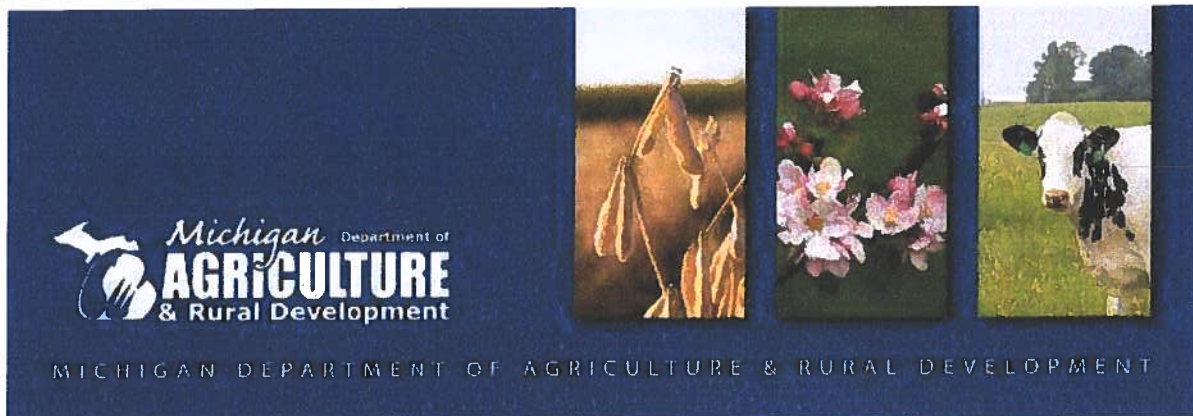
From: Nia M Becker <nmbecker@mtu.edu>
Sent: Tuesday, September 8, 2020 3:19 PM
To: MDARD-rtf
Subject: Re: Agriculture Commission and MI Dept. of Agriculture and Rural Development Seeking Public Input on Agricultural Management Practices

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Foresters and Loggers typically leave at least 100ft buffer between logging and bodies of water. Farms need to be doing the same thing, including leaving buffers around drains. Our surface water is important, and naturally vegetated buffers will reduce nutrient runoff and soil erosion.

What if a farm had to be MAEAP verified before receiving a tax exemption?

On Tue, Sep 8, 2020 at 1:02 PM Michigan Dept of Agriculture & Rural Development <MDARD@govsubscriptions.michigan.gov> wrote:



For immediate release: September 8, 2020

Program contact: [Michael Wozniak](mailto:Michael.Wozniak@mdard.michigan.gov), 517-285-1752
Media contact: [Jessy Sielski](mailto:Jessy.Sielski@mdard.michigan.gov), 517-331-1151

Agriculture Commission and MI Dept. of Agriculture and Rural Development Seeking Public Input on Agricultural Management Practices

Deadline to provide comment is October 7, 2020

LANSING, Mich. – Today, the Michigan Commission of Agriculture and Rural Development and the Michigan Department of Agriculture and Rural Development (MDARD) announced the annual review period for the proposed drafts of the 2021 Generally Accepted Agricultural and Management Practices (GAAMPs). Comments will be accepted via email, mail and a virtual public meeting that is scheduled for October 1, 2020.

The GAAMPs are reviewed each year by committees comprised of various experts and revised or updated, as necessary. All proposed GAAMPs changes are reviewed and approved by the Michigan Commission of Agriculture and Rural Development.

Public comment will be taken on proposed changes to the following GAAMPs: Manure Management and Utilization; Care of Farm Animals; Site Selection and Odor Control for New and Expanding Livestock Facilities; and Farm Markets. The GAAMPs regarding Pesticide Utilization and Pest Control; Nutrient Utilization; Cranberry Production; and Irrigation Water Use have no proposed changes for 2021.

MDARD will forward all comments received by the due date to the respective GAAMPs Task Force Committee Chairpersons for consideration prior to final review and presentation to the Michigan Commission of Agriculture and Rural Development at the November 5, 2020 meeting.

The proposed draft GAAMPs will be available for public review and comment until 5:00 p.m. on **Wednesday, October 7, 2020**, at www.Michigan.gov/RighttoFarm. Comments are accepted by:

- **Email** to MDARD-RTF@Michigan.gov
- **Mail** to MDARD's Environmental Stewardship Division, P.O. Box 30017, Lansing, MI 48909 and postmarked no later than October 7, 2020.
- **Call** into the public input meeting on October 1, 2020, at 9:00 a.m. [Join Microsoft Teams Meeting](#) or call 248-509-0316 and enter Conference ID: 599 584 55#

For a copy of any of these GAAMPs including the proposed revisions, please visit www.Michigan.gov/RighttoFarm, or contact the MDARD's Environmental Stewardship Division at 517-284-5619, or toll free at 877-632-1783.

###



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This email was sent to nmbecker@mtu.edu using GovDelivery Communications Cloud on behalf of: Michigan Dept of Agriculture & Rural Development · P.O. Box 30017 · Lansing, MI 48909 · 1-800-292-3939

--
Nia Becker
Forestry Class of 2016
Michigan Technological University
(517) 599-5913

**GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES (GAAMPs)
PUBLIC COMMENT FORM**

Date:

Name:

Address, City, State, Zip:

Email Address:

Phone Number:

Set of GAAMPs being addressed (Please use a separate form to comment on other GAAMPs)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Manure Management and Utilization | <input type="checkbox"/> Irrigation Water Use |
| <input type="checkbox"/> Site Selection and Odor Control for New and Expanding Facilities | <input type="checkbox"/> Pesticide Utilization and Pest Control |
| <input type="checkbox"/> Care of Farm Animals | <input type="checkbox"/> Cranberry Production |
| <input type="checkbox"/> Nutrient Utilization | <input type="checkbox"/> Farm Markets |

Describe specific changes that should be made to the indicated GAAMPs:

Till in the manure after spreading. It is such a horrible smell & if it gets tilled into the ground it wouldn't be as potent!

MICHIGAN DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT

**GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES (GAAMPs)
PUBLIC COMMENT FORM**

Date:

Name:

Address, City, State, Zip:

Email Address:

Phone Number:

Set of GAAMPs being addressed (Please use a separate form to comment on other GAAMPs)

<input checked="" type="checkbox"/> Manure Management and Utilization	<input type="checkbox"/> Irrigation Water Use
<input type="checkbox"/> Site Selection and Odor Control for New and Expanding Facilities	<input type="checkbox"/> Pesticide Utilization and Pest Control
<input type="checkbox"/> Care of Farm Animals	<input type="checkbox"/> Cranberry Production
<input type="checkbox"/> Nutrient Utilization	<input type="checkbox"/> Farm Markets

Describe specific changes that should be made to the indicated GAAMPs:

Dictate that the application of liquid manure to fields be better managed to mitigate smell and flies, regardless of whether it is applied to wheat stubble, harvested fields or by farmers practicing no-till agriculture. The current GAAMPs for application on wheat stubble can be particularly onerous in the summer to neighboring residences and steps need to be taken to address this.

I have a vacation trailer on a farm at 1296 Litchfield Road, outside of Litchfield. My cousin and his wife own the farm and complained vehemently this summer about the spreading of liquid manure on a wheat stubble field directly across from their house and farm. They say a local farmer spread manure on that field on excessively hot and humid days in August and that the stench and flies from this action were intolerable. The family farm house is over 100 years old and is not air conditioned and they were forced to keep the windows closed on the hottest of days due to the smell and flies. My trailer is approximately three-quarters of a mile northwest of the house, and I was present several times that month when the applications were several days old. I can attest that even at that distance and several days post application, the smell was still strong and pungent.

I am not a farmer and don't have a ready solution for this. However, there has to be some kind of accommodation that can be dictated by the MDA that will mitigate this situation. Maybe restrictions on when and where this manure can be applied can be tightened. My cousins' suggestion of injection or some form of incorporation, even on no-till land, seems reasonable. It does not seem fair nor in the spirit of community farming that one farmer can so negatively impact others with out some kind or recourse or resolution of difference.

Send comments with any supporting attachments to MDA-Right-To-Farm@michigan.gov

**GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES (GAAMPs)
PUBLIC COMMENT FORM**

Date:

Name:

Address, City, State, Zip:

Email Address:

Phone Number:

Set of GAAMPs being addressed (Please use a separate form to comment on other GAAMPs)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Manure Management and Utilization | <input type="checkbox"/> Irrigation Water Use |
| <input type="checkbox"/> Site Selection and Odor Control for New and Expanding Facilities | <input type="checkbox"/> Pesticide Utilization and Pest Control |
| <input type="checkbox"/> Care of Farm Animals | <input type="checkbox"/> Cranberry Production |
| <input type="checkbox"/> Nutrient Utilization | <input type="checkbox"/> Farm Markets |

Describe specific changes that should be made to the indicated GAAMPs:

Till the manure so there is less smell!

Send comments with any supporting attachments to MDA-Right-To-Farm@michigan.gov

MICHIGAN DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT

GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES (GAAMPs)
PUBLIC COMMENT FORM

Date: 10.6.2020

Name: Alissa Ferry

Address, City, State, Zip: 9411 Litchfield Rd. Litchfield, MI 49252

Email Address: ferryfarmsllc@gmail.com

Phone Number: 517.252.0016

Set of GAAMPs being addressed (Please use a separate form to comment on other GAAMPs)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Manure Management and Utilization | <input type="checkbox"/> Irrigation Water Use |
| <input type="checkbox"/> Site Selection and Odor Control for New and Expanding Facilities | <input type="checkbox"/> Pesticide Utilization and Pest Control |
| <input type="checkbox"/> Care of Farm Animals | <input type="checkbox"/> Cranberry Production |
| <input type="checkbox"/> Nutrient Utilization | <input type="checkbox"/> Farm Markets |

Describe specific changes that should be made to the indicated GAAMPs:

None!

It is imperative to our environment that farmers retain exemptions to immediate 100% incorporation for no-till practices and wheat stubble application.

No-till practices allow farmers to minimize soil disturbance, therefore minimizing soil erosion and capturing important nutrients to help with growing future crops.

Send comments with any supporting attachments to MDA-Right-To-Farm@michigan.gov

**GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES (GAAMPs)
PUBLIC COMMENT FORM**

Date:

Name:

Address, City, State, Zip:

Email Address:

Phone Number:

Set of GAAMPs being addressed (Please use a separate form to comment on other GAAMPs)

<input checked="" type="checkbox"/> Manure Management and Utilization	<input type="checkbox"/> Irrigation Water Use
<input type="checkbox"/> Site Selection and Odor Control for New and Expanding Facilities	<input type="checkbox"/> Pesticide Utilization and Pest Control
<input type="checkbox"/> Care of Farm Animals	<input type="checkbox"/> Cranberry Production
<input type="checkbox"/> Nutrient Utilization	<input type="checkbox"/> Farm Markets

Describe specific changes that should be made to the indicated GAAMPs:

Farmers need to be more respectful and aware of the neighbors and surrounding towns and not spread ~~manure~~ manure so often. Liquid manure needs to be incorporated into the soil upon impact. The ammonia fumes are not at the recommended levels for nearby homes. Animals and humans can get very sick from the ammonia levels. The area farmers should be better community members and take into consideration the impact of their actions if they want the community to support them.

Send comments with any supporting attachments to MDA-Right-To-Farm@michigan.gov

**GENERALLY ACCEPTED AGRICULTURAL AND MANAGEMENT PRACTICES (GAAMPs)
PUBLIC COMMENT FORM**

Date: 10-5-2020

Name: Michael & Anita Khapp

Address, City, State, Zip: 10444 W Litchfield Rd
Litchfield MI 49252

Email Address: needakhapp@live.com

Phone Number: 517-542-2160

Set of GAAMPs being addressed (Please use a separate form to comment on other GAAMPs)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Manure Management and Utilization | <input type="checkbox"/> Irrigation Water Use |
| <input type="checkbox"/> Site Selection and Odor Control for
New and Expanding Facilities | <input type="checkbox"/> Pesticide Utilization and Pest Control |
| <input type="checkbox"/> Care of Farm Animals | <input type="checkbox"/> Cranberry Production |
| <input type="checkbox"/> Nutrient Utilization | <input type="checkbox"/> Farm Markets |

Describe specific changes that should be made to the indicated GAAMPs:

It does get pretty stinky around here in the spring, summer and fall.

Send comments with any supporting attachments to MDA-Right-To-Farm@michigan.gov



Michigan League of Conservation Voters: 2021 GAAMPs Public Comment

The need for responsible agricultural practices that allow farms to operate in harmony with adjacent communities is becoming increasingly clear. As residential suburbs and exurbs continue to encroach on farmlands at an escalating rate, conflicts between local residents and farmers based on nuisance complaints will increase. Staff tasked with managing and mitigating these nuisance complaints must be armed with an agreed upon set of guidelines to avoid an array of interpretations. In order for both farmers and communities to be confident that the agricultural practices outlined in the GAAMPs are environmentally responsible, the language used within the GAAMPs must be clear and give unambiguous guidance to farmers. We believe farmers want what is best for their neighbors and the environment, and they deserve clear best management practices to follow to avoid any nuisance lawsuits.

Currently, the language in the GAAMPs does not clearly state what is required from farmers to receive legal protection. Although we understand that the GAAMPs language was initially designed to add flexibility for farmers, words like "should" and "recommends" imply that farmers are able to ignore the outlined practices and still receive legal protection from the Right to Farm Act. As a result, there can be confusion among farmers and community stakeholders as to what practices are actually required by the GAAMPs for compliance. This confusion could lead to poor management practices, false security for farmers, and heightened conflict.

Although MDARD staff already interpret the current language in the GAAMPs as if the language was strengthened, greater clarity in the GAAMPs themselves would provide enhanced guidance to farmers and would decrease misinformation in local communities concerned about farm operations. Furthermore, if farmers better understand what is required of them to be in compliance with the GAAMPs, the number of verified nuisance complaints could decrease as farmers and communities have better guidance as to what practices are environmentally responsible, saving state resources that would otherwise be spent on conflict resolution.

Michigan LCV believes that farmers and local communities want local agricultural practices to be successful and environmentally responsible. To foster a space of cooperation and to increase confidence in farming practices as residential communities continue to grow, we believe MDARD must clarify the language in the GAAMPs to ensure that communities and farmers know what agricultural practices are acceptable in Michigan. Clear language that gives direct guidance to farmers will not only make compliance with the GAAMPs easier for farmers to achieve, but it will also ensure that they have air-tight evidence if their compliance status is challenged in court.

MDARD-rtf

From: Scott & Alissa Ferry <ferryfarmsllc@gmail.com>
Sent: Wednesday, October 7, 2020 4:20 PM
To: MDARD-rtf
Subject: Public comment

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Set of GAAMPs being addressed: **ALL**

We urge MDARD to notify all complainants of the law which allows MDARD to levy a penalty for unverified complaints. We strongly urge MDARD to recoup the costs of investigating unverified complaints, as provided for in the Right to Farm Act. We do not support anonymous Right to Farm complaints.

Sincerely,

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Ferry Farms, LLC
Scott & Alissa Ferry
Cell: 517-214-3298
Fax: 517-542-4000
Web: www.ferry-farms.com

