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Sent: Wednesday, January 22, 2014 4:48 PM
To: Wilcox, Rhonda (MDA)
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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.

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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.

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