



Michigan Commission of Agriculture and Rural Development  
RE: Proposed Changes to the 2014 Site Selection GAAMPs

February 12, 2014

Dear Commissioners,

As you know, the Michigan Department of Agriculture and Rural Development announced a Public Comment Period on proposed changes to the 2014 GAAMPs on January 6<sup>th</sup>, and provided Michigan residents until January 22<sup>nd</sup> to submit their comments. Despite the unusually short timeframe and poor weather, the public response was extraordinary; my own review indicates that there were a total of 713 responses, not counting the duplicates that occurred when individuals responded more than once, or in more than one format (public comment period, email, letter, change.org petition). This is in contrast to the 10 responses received in 2011 to proposed changes in the GAAMPs, and the 17 responses received in 2012; in 2013 no public comment period was held.

The response was extraordinary not only in terms of volume, but especially in the dedication and commitment that so many Michigan citizens expressed with respect to their own engagement in agriculture. I counted 684 responses from folks who have small farms, or who purchase from small farms, or who know small farmers in rural, suburban, and urban Michigan, and who want those small farm operations to continue unhindered. In contrast, only 21 individuals wrote in support of the proposed changes. Looking at specific groups, 4 elected officials responded, and all are opposed to the proposed changes. Perhaps most surprisingly, of the zoning and planning officials who responded, more were opposed to these changes in the Site Selection GAAMPs (8) than were in support of them (6).

Furthermore, if you open those 927 pages you will see immediately that these are not canned responses; instead you will see that there are hundreds of personal stories from people trying to communicate with you about why small farming is important to them. The public comment period on January 22<sup>nd</sup> was similar. It was a rare event, and a privilege to hear so many heartfelt stories about why agriculture mattered to the people who attended. Recurrent themes from the 684 respondents focused on the importance of personal self-sufficiency, and of retaining agricultural practices that are sustainable. I heard a deep distrust of the food that is produced in our modern agricultural system, with concerns raised over environmental impacts, food quality, and animal welfare. Many responses came from people who feel that participating in agriculture is an essential act of parenting, because so many good values and good practices are a natural outcome of raising animals. In addition, there were many responses that attempt to inform you that entire rural townships have already been zoned residential, and that policies are already in place there that prohibit agriculture. Others inform you that they are in poverty, and growing food is the means by which they feed their families, and others that they or their children have health issues that require that they eat non-processed foods, which aggravate their medical conditions.

In the pages that follow you'll find both a breakdown of the responses to the public comment period, as well as a smattering of quotes from these pages. I hope that the effort that these Michigan residents have undertaken to communicate with you will not be wasted, and that you will refrain from approving the proposed changes to the Site Selection GAAMPs.

**Total number in SUPPORT of proposed changes to Site Selection GAAMPs:** **21 (2.9%)**

Public Meeting	0
Email	21
Letter	0 (2 duplicates from email not counted)

**Total number OPPOSED to proposed changes to Site Selection GAAMPs:** **684 (95.9%)**

Public Meeting	18
Email	509 (20 duplicates not counted)
Letter	9 ( 3 duplicates not counted)
Change.org	148 (12 duplicates not counted)

**Total number OTHER:** (1 duplicate not counted) **8 (1.1%)**

**Total number of respondents (without duplicates):** **713**

**ELECTED OFFICIALS:**

2 state representatives, 1 mayor and 1 township elected official responded.  
4 elected officials OPPOSE these changes to the Site Selection GAAMPs.

**ZONING AND PLANNING OFFICIALS:**

SUPPORT proposed changes to Site Selection:	6 (35.3%)
OPPOSED to proposed changes to Site Selection:	8 (47.1%)
OTHER comments to changes to Site Selection:	3 (17.6%)

**NON-PROFIT ORGANIZATIONS:**

4 non-profit organizations representing food and farm interests in Michigan responded. 3 non-profits OPPOSE these changes to the Site Selection GAAMPs, and one advocates for more conversation. No non-profit organization spoke in support of the proposed changes.

**Locations of respondents, when given:**

Ada, Alger, Allegan, Alto, Ann Arbor, Antwerp, Auburn Hills, Battle Creek, Bay City, Belleville, Benonia, Big Rapids, Bloomfield Hills, Boyne City, Brighton, Burton, Canton, Cassopolis, Cedar, Centreville, Chassell, Cheboygan, Chelsea, Clarkston, Clayton, Clio, Cohoctah, Comstock, Dansville, Davison, Decatur, Detroit, Dexter, East Lansing, Eastpointe, Edwardsburg, Farmington, Farmington Hills, Ferndale, Flushing, Frankfort, Garden City, Gaylord, Grand Blanc, Grand Haven, Grand Rapids, Grass Lake, Gwinn, Hastings, Herrin, Highland, Hillsdale, Holland, Holly, Honor, Horton, Howell, Interlochen, Jackson, Kalamazoo, Lake Orion, Lansing, Lincoln Park, Lowell, Marquette, Mattawan, Metamora, Middleville, Mikado, Milford, Mio, Monroe, Mount Pleasant, Munith, Muskegon, Nashville, Negaunee, New Baltimore, Northville, Nunica, Oak Park, Okemos, Onekama, Ortonville, Oshtemo, Osseo, Ottawa Lake, Owosso, Parma, Pelkie, Pickford, Pittsford, Plymouth, Portage, Quincy, Redford, Richland, Rochester, Rochester Hills, Rockford, Roseville, Royal Oak, Saginaw, South Lyon, Southfield, Sterling Heights, Sutton's Bay, Tecumseh, Three Rivers, Traverse City, Trenary, Troy, Warren, West Bloomfield, Williamsburg, Ypsilanti, Zeeland, Antwerp Twp, Augusta Twp, Bangor Twp, Brandon Twp, Chesterfield Twp, Chocolay Twp, Forsyth Twp, Genoa Charter Twp, Grand Haven Charter Twp, Groveland Twp, Hanover Twp, Inland Twp, Kenockee Twp, Kimball Twp, Lake Twp, Lincoln Twp, Monroe Twp, Ray Twp, Sharon Twp, Shelby Twp, Springfield Twp, Van Buren Twp, Waterford Twp, Wilcox Twp, Williamston Twp, Ypsilanti Twp, Allegan County, Benzie County, Emmet County, Hillsdale County, Ingham County, Ionia County, Kalamazoo County, Kent County, Livingston County, Midland County, Ottawa County, St. Clair County, Van Buren County.

**Quotes from Public Comments to the Proposed Site Selection GAAMPs, from citizens across Michigan:**

*All regions in Lincoln Township are zoned residential, business or industrial and 2. No farm animal can be kept on a plot less than 5 acres. If the Site Selection GAAMPs are changed, then the situation in this rural township will be that you cannot have any number of animals, chickens or otherwise, on a plot of land under 5-acres. Edenville Township, Midland County (also a very rural township) the zoning ordinance states a property owner must own 10 acres in order to own any farm animal.*

*I strongly disagree with someone telling me that I can't have a few harmless chickens in my own backyard! In my 60 years on this earth I have never seen a bad backyard chicken. In these hard times I see nothing wrong with trying to be self sufficient.*

*Please do not throw the citizens of Michigan to the mercy of every township board in the state. We do not need any chaos added to the mix.*

*I do not believe the proposed revisions to the act are neither legal nor in the best interests of the citizens of Michigan.*

*Please consider the benefits of raising children around animals before making a regulation changes that will make that unattainable for most families and most children.*

*... the freedom to keep animals is a far more important freedom than the freedom not to see them.*

*The growing trend toward self-sufficiency - whether at the individual or the community level - is good for families, good for communities, and good for Michigan.*

*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.*

*who would it possibly benefit to have everyone completely dependent upon the industrial food system and to squash these local efforts to be able to some degree provide for oneself and neighbors in this way ~ very much what was once quite typical in our grandparents time ~.*

*please make sure it is not the governments fault its people don't get fed.*

*The values that the children learn thru raising animals stick with them a lifetime.*

*...we are near bankruptcy. Our farming endeavors are becoming more important all the time.*

*With Monsanto, GMO's, pesticides, herbicides, antibiotics, and hormones being put in our food by big companies and multimillionaires we are being put between a rock and a hard place here.*

*I have seen over the many years my area (Kimball Township) change from 80% agriculture to almost 20% agriculture. I have seen new ordnances come about that are now inhibiting my farming practices, practices that my family has used since 1974 when we purchased the land.*

*New practices are not developed to address concerns of the neighbors, but rather are designed to protect commercial agriculture operations or concentrated animal feeding operations (CAFOs).*

*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.*

*Surely, we don't want people to see Michigan - such an agricultural haven - as a backward controlling state where new and modern activities are seen as negative threats.*

*And if the state law is altered, we will lose a lot of very positive and social activity, which is otherwise often few and far between, in our cities.*

*I am rather surprised to see an attempt to halt all small backyard farming under the pretense that some are living next to thousands of chickens. That would be a CAFO. If people are understandably bothered by living next to thousands of chickens, please, by all means, deal with that. However, outlawing all the tiny farming operations popping up here and there is overkill.*

*Essentially, these changes are permitting a local government to decide who is afforded State-given Rights.*

*Please support the right for all of us—no matter where we live—to have control of our food production. We need more local farming, not less!*

*I am a teacher in Grand Haven and operate a small family farm on 7 acres of property zoned rural residential. We are currently protected by the Michigan Right To Farm Act, although not supported by current zoning laws. We have met with our township officials and I have been shocked to realize what little research they have done on small scale farming and what conclusions they have formulated based on their limited experience and research.*

*Michigan is in a special economic development at this time. We, our government, have reduced the amount of food stamps allowed per family. Michigan, our government, has reduced the amount of assistance to those living at or below poverty level. Michigan, our government, has reduced the amount of unemployment benefits to those people who are either underemployed or totally without employment. And then we want to take away their ability to feed their families by growing food themselves?*

*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.*

*Damn right, it's ludicrous!*

*Little evidence has been described publicly to explain the need for a change to the definition of livestock production facility or inclusion of a new Category 4 for GAAMP site selection.*

*The public has not had enough time to read and understand the proposed changes. We require more time. Frankly, I feel this was pushed under the wire.*

*For thousands of years a relative of ours was given the choice to support their family. I am speaking of the really old rice paddies that were passed down from generation to generation in China, these families would only pass the test of time, with a harvest of rice. Our situation is similar in Michigan, let this young Country be uplifting to its people and allow small farms to be of choice.*

*How much damage really can a small backyard flock of livestock do compared to these huge CAFO's with manure lagoons and the like.*

*My husband and I own one of Michigan's largest alternative beekeeping businesses and we simply would not exist if it weren't for the RTFA.*

*We need our citizens to be MORE self-sustaining, not less in these changing and challenging times.*

*If my family is not protected by the right to farm act with our livestock, then who is it protecting?*

*Urban agriculture is one of the most exciting and vibrant and positive movements happening in our state today. Please respect the small-scale right to farm.*

*If they want this rule they should outlaw outside cats and dogs also.*

*We don't want GMO tainted crap.*

*They are basically forcing the people to be dependent on being consumers rather than self-producers. This is hurting more than just the state, this is killing humanity.*

*It will only allow large commercial farms (who have money to throw at lobbies/politicians) to thrive and grow and force us to eat their food - at high risk and major health costs to our bodies and our earth.*

*Without legislative action, the intent of the RTFA will remain the same, despite MDARD changing or amending voluntary guidance practices such as GAAMPs.*

*Many areas are, in fact rural, yet now zoned as residential. Being forced to get rid of family livestock is just ridiculous. Will YOU be the one to tell my 12 year old boy that he must get rid of his pet goat?*

*Manure lagoons, and hazardous levels of ammonia in chicken confinement houses represent practices in industrial agriculture that are damaging to the environment. Small flocks of chickens like mine, do not stink up the neighborhood.*

*There are small businesses in Michigan that we support in their efforts to provide local food. Your committee's recommendation will put them out of business.*

*From a planning perspective, I see a return to chaotic/conflicting zoning requirements emerging at the local level all over the state... directly in opposition to the original intent of RTFA, and an immense step backward for food security efforts in Michigan.*

*Please save the GAAMP. We are not bad people and we are making less money than back in the 1970's. We have to find a way to feed ourselves.*

*Many of us working poor residents of this state rely on these "farms" to feed our families and help us make ends meet. Stripping us of this protection would harm us in very real, physical ways. It would literally take food from our children's mouths. In these hard economic times, it is unconscionable to even consider forcing us into even greater poverty than we already suffer.*

*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.*

*We believe these changes would hobble the growing local food movement particularly concerning backyard chicken & egg raising at the very time when more encouragement from the state is needed.*

*I don't want the State of Michigan messing with our right to keep two chickens.*

*Overall the small scale animal farming community is in decline due to the retirement of aging farmers, rising cost of farmland and pressure of large-scale commercial farming. Adding these new rules to this will hurt us in developing the next generation of small scale farmers (some of whom start as children raising a few chickens in residential areas) and reduce the ability of responsible Michiganders to be more self-sufficient.*

*please! reconsider making it difficult for families to be self sufficient by restricting small farmers rights, it is our God given right to work the soil and raise livestock so that we may teach our children how to LIVE...*

*The revisions in GAAMPs Right to Farm act would take away so many citizen's rights to be as self sufficient as we can! We do NOT support these changes!*

*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.*

*If you make it harder for us to create things with our own hands, you take away the strength that built this nation and the skills we could teach our children.*

*In all fairness, small-scale farming nuisances, residential or otherwise, can be tolerated just as much as lifestyles that convert land use into McMansions and chemical-dependent evergreen lawns.*

*If we are to have a connection with our food system, localized for sustainability, and liberty from reliance on Big Ag, which also requires greater energy/transportation resources; we must have the ability to locally raise and grow our food.*

*Please do NOT change the Michigan Right to Farm Act that protects not only my family's right to farm our property, but also protects the animals from horrible factory farming conditions!*

*As our government has proven to be insufficient in providing subsidies to working families allow and protect these people to live off the land to sustain their homes.*

*Restricting the rights of any individual willing to care for animals and their family goes against all aspects of raising responsible citizens. When food prices get too high, when conventional food becomes too toxic or scarce, what mechanisms will those who pay your salary have to continue surviving?*

*Please allow the small farms to continue to prosper without interference. They are doing no harm to anyone and should be left to produce foods which are vitally important in growing communities. They should be applauded as the work is hard and laborious. They deserve to be respected in the fullest by being allowed to farm as they wish.*

*As a long time Michigan resident who values the benefits of quality food from small local farms, this concerns me. All Michigan residents have a right to participate in the production of their own food regardless of where they live. Where is the data showing that these revisions are warranted and what benefits will it provide to Michigan residents?*

*We have chickens and the neighborhood children help us harvest the eggs. The people in this poverty stricken inner city location love what we are doing and we have never heard a complaint, but they often say, "more people should be doing this". The City of Kalamazoo and the Kalamazoo County Land Bank support and encourage our efforts to provide beautiful, productive green space where blighted abandoned homes once stood. Please protect our right to produce our own healthy food.*

*This move would hinder peoples in grocery deserts, those trying to stretch their limited income by growing their own food, and those who do not wish to partake in the sometimes harmful practices of some large agricultural companies.*

*Good grief.*

*Please do not throw the citizens of Michigan to the mercy of every township board in the state. We do not need any chaos added to the mix.*

*The freedom to farm/homestead is not based on zoning or regulation, it is a right and freedom. Everyone has the right to grow their own food be it vegetation or livestock.*

*I think that this is a age when food and water is about quality not quantity.*

*The reasoning that it will help keep squabbles between neighbors down seems minor compared with my right to be self sufficient and to be able to eat meat without a guilty conscience. Perhaps we should take away peoples cars so that they do not act out in road rage?*

*Many neighbors and people in this area depend on food stamps, cash assistance and unemployment that will be ending soon. There may not be jobs, there may not be much money, but we can always have a garden and a few small animals to provide some solid nutrition.*

*Please protect my rights to farm. Small beekeeping operations are essential to health and wellness.*

*Self sustenance is for everyone, not just those deemed by lawmakers as worthy. Let us continue to exercise our rights to feed our families.*

*There is a place for agricultural zoning and residential home ownership.*

*The whole thing stinks ....like a factory farm*

*The right to grow food and keep small animals in our backyards should be inherent.*

*This law seems to only protect the powers that be who do not wish to see self-sufficiency.*

*If we want true food security — defined as the ability of a country, region, state or community to be as self-sufficient in food production as possible — then we need a legal system that supports local, small-scale food production.*

*Your job is to protect me - my right to anything you have a right to and more.*

*Small farms are not (should not) be offensive because they adhere to sustainable farm practices. It's the large scale farms that overload the natural balance of the environment.*

*It is important to me that all citizens in Michigan have a right to participate in the production of their own food, wherever they live.*

*No one can say that we, as Americans, are free if the government takes Americans right to farm their own land away.*

*The foundation of a sustainable and just local food system rests largely on the expression of well-intentioned individuals to exercise their right to produce nutritious animal based foods within communities, so long as proper management is followed.*

*We deserve to have our rights protected and for the current state law to protect us from our over infringing local governments. The fact that we need government to protect us from government is a joke in itself.*

*Honestly, if this is an attempt to attack the backyard chicken farmer, this is an inappropriate place to do so, as it does not take into consideration any practical qualifications as to whether the land or facilities are actually appropriate for the animals.*

*As an urban farmer and beekeeper, I strongly protest the proposed changes to the RTFA. MOST people live in cities. If we are to have the right and freedom to produce our own food, we need to do some of that in cities.*

*Times are changing and self-sufficiency and a resilient local food system are increasingly more important in our community.*

*Please chose wisely and do not make the proposed changes. We citizens have the right to farm in Michigan. Please don't do anything to violate that right.*

This is only a brief summary of the comments you will find in the 927 pages of public response posted by MDARD on their website. But I hope it is enough to convince you that the proposed changes to the 2014 Site Selection GAAMPs are broadly opposed by citizens in Michigan, for reasons that you can understand and agree with.

Sincerely,



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