

Payton, Ian

From: Helen Coleman <hmoney5431@yahoo.com>
Sent: Friday, March 15, 2019 3:26 PM
To: Planning Comments; Robert Coleman & Helen

Sent from Mail for Windows 10

FOR OFFICE
USE ONLY

Date Received: 3-15-19

Date Reviewed: 3-18-19

Complete: Yes No

March 4, 2019

City of Great Falls

Dear Zoning/Planning Board:

I Am deeply concerned about the zoning changes that are being proposed. You say it has nothing to do with the proposed slaughter house which you hope to foist upon Great Falls residents against the majority of our wishes, but we are not convinced. It is truly stunning to me that you would wish to do this to our city. The best thing we have going for us is clear blue skies and clean air. You are proposing filthy grounds, filthy air to breathe, filthy ground water, disease, hospitals that will be overrun with very low income workers coming in, many of them will be illegals as Canada does accept them in their country, and total infrastructure overhaul. Our taxes will skyrocket and our schools will be overrun. And crime will skyrocket. And please don't tell me I'm wrong in these assertions because deep down you know I'm right.

I can not for the life of me understand why you would be so determined to bring into our city such an abomination. Especially since it is a foreign country that wants to garbage up our city and state, so they can continue to advertise their country as "pristine". I believe having a Canadian owned refinery here is enough. Plus allowing their pipeline to come thru Montana is more than generous. Let them put their filthy slaughterhouse in their own backyard.

As I mentioned, it baffles me why our zoning/planning board would even entertain foisting such an abomination on our city. Forgive me if the only logical explanation I can come up with is a truly awesome golden carrot dangled before their eyes. I see no other plausible reason to explain it.

Bertha Olson
3448 14th Ave. So.
Great Falls, MT 59405



FOR OFFICE
USE ONLY

Date Received: 3-13-19

Date Reviewed: 3-13-19

Complete: Yes No

Hopkins, Sandor R.

From: Carolyn Craven <lifeisgood4us@xmailpost.com>
Sent: Friday, March 15, 2019 1:56 PM
To: Planning Comments; Briggs, Joe; Weber, Jane; Larson, James
Subject: Cascade County Proposed Zonin Changes - Public Comments
Attachments: Public Comments 03.15.19.pdf

Attached please find additional comments.

Respectfully submitted,

Carolyn Craven



Date Received: 3-15-19

Date Reviewed: 3-18-19

Complete: Yes No

Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

March 15, 2019

PUBLIC COMMENTS ON CASCADE COUNTY PROPOSED ZONING CHANGES

DEFINITIONS

1. PROPOSED NEW ITEM

AGRICULTURAL COMMODITY

Any commodity produced from an agricultural use. This includes, but is not limited to, livestock, raw milk, grains, soybeans, hay, corn, timber, honey, fish, fruits, vegetables, crickets, or oil seeds.

RECOMMEND
AGRICULTURAL COMMODITY-ANIMAL PRODUCTION
AGRICULTURAL COMMODITY-CROP PRODUCTION

2. PROPOSED NEW ITEM

COMMODITY

An unprocessed material or other natural resource that is intended for sale or exchange. This includes, but is not limited to, crops, minerals, livestock, insects, or fish.

RECOMMEND
COMMODITY-ANIMALS
COMMODITY-CROPS

3. PROPOSED NEW ITEM

ANIMAL PRODUCTION

To raise animals as a process of producing a commodity or multiple commodities. This includes livestock ranching/farming on open range pasture, equine production, apiculture, aquaculture, entoculture.

4. PROPOSED NEW ITEM

CROP PRODUCTION: To grow crop plants as a process of producing a commodity or multiple commodities; mainly food and/or fiber products. This includes farms, orchards, groves, greenhouses, and nurseries primarily engaged in growing crops, plants, vines, or trees and their seeds.

THE PROPOSED NEW ITEMS OF "ANIMAL PRODUCTION" AND "CROP PRODUCTION" WOULD EASILY FACILITATE MY RECOMMENDATION ON ITEMS #1 AND #2 ABOVE.

5. PROPOSED NEW ITEM

BUTCHER SHOP

A retail store establishment where livestock is slaughtered, butchered, prepared, and packaged for sale or temporarily stored on-site. The scale of operation for a retail butcher shop shall not require stockyards or on-site stabling of animals to be slaughtered (see Slaughterhouse).

C.K. Craven 03.15.19
Homeowner, Great Falls

6. PROPOSED NEW ITEM

ANIMAL FEEDING OPERATION (AFO)

A lot or building where the following conditions are met: (1) small or large livestock animals (other than aquatic animals) have been, are, or will be stabled or confined and fed or maintained for a total of 30 days or more in any twelve (12) month period; (2) crops, vegetation, forage growth, or post-harvest residues are not sustained in the normal growing season over any portion of the lot or building.

7. PROPOSED NEW DEFINITION

COMMERCIAL FEEDLOT

Current Definition

Establishments engaged in the fattening, raising, or breeding of animals typically for the commercial production of food, where the animals are fed primarily in pens, lots, or buildings (partially or wholly enclosed). Uses include but are not limited to hog ranches, poultry /egg farms, and cattle feed lots. The term does not include 4-H, FFA and other youth experiential learning programs, staging of livestock for immediate transport, or slaughterhouses. Pastures shall not be considered animal feedlots.

Proposed New Definition

An animal feeding operation (AFO) engaged in the raising or fattening of livestock animals for commercial purposes where the animals are confined at a high density relative to open range pasture raising and feeding operations with rotational grazing and stocking rates designed to sustain grazing pastures. Commercial feedlots are distinct from transportation stockyards where livestock are temporarily stabled or boarded as part of a process of transportation. The term does not include 4-H, FFA and other youth experiential learning programs.

CONCERNS

The disadvantages of feedlots include: 1) Large inputs of grain, fish meal, water and fossil fuels, 2) Greenhouse gases – carbon dioxide (CO₂), methane (CH₄), and hydrogen sulfide (H₂S), 3) Concentration of animal wastes that can pollute water, 4) Use of antibiotics that can increase genetic resistance to microbes in humans – there have been serious E-coli episodes related to large feedlot operations.

PLEASE READ THE BRIEF ATTACHED RESEARCH ON FEEDLOT ISSUES. THANK YOU!

Feedlot Issues Attachment is at the end of this paper.

RECOMMEND STRINGENT REGULATON OF NUMBERS AND SIZES OF FEEDLOTS DUE TO LAND, AIR AND WATER POLLUTION FROM FEEDLOTS.

8. PROPOSED REVISION**CONCENTRATED ANIMAL FEEDING OPERATIONS (CAFO)**

~~Concentrated animal feeding operation means~~ (deleted from current definition; otherwise the same).
 An animal feeding operation (AFO) that is defined as a large concentrated animal feeding operation or as a medium concentrated animal feeding operation or that is designated as a concentrated animal feeding operation in accordance with 40 CFR §122. Two or more animal feeding operations under common ownership are considered to be a single animal feeding operation for the purposes of determining the number of animals at an operation if they adjoin each other or if they use a common area or system for the disposal of wastes. (See §75-5-801(2), MCA).

??? QUESTION FOR PLANNERS ???

- 1) What is the prescribed size (land area plus maximum number of animals at any point in time), to determine how much space is allocated to each animal for AFOs and CAFOs?
- 2) Can we require more stringent regulations to mandate fewer animals at a time that the current maximum number of animals currently allowed?
- 3) Are there limits anywhere in the proposed regulations for the number of CAFOs/AFOs/Feedlots that potentially could be approved? How much land is allocated for those uses?

RECOMMEND REGULATING HUMANELY APPROPRIATE SPACE FOR THE ANIMALS TO HAVE FREEDOM OF MOVEMENT RATHER THAN THE CURRENT STATUS QUO OF EXTREMELY HORRIFIC CONDITIONS.

9. PROPOSED REVISION**LIVESTOCK LARGE**Current Definition

Animals such as, but not limited to, horses, cows, emus, llamas, alpacas, ostriches, and the like.

Proposed New Definition

Animals with a per head animal unit (AU) value greater than four-tenths (0.4) and used primarily for the purpose of providing food, clothing, or work. Animal Per head AU values for common livestock animals are provided in Section 8.

10. PROPOSED REVISION**LIVESTOCK, SMALL**Current Definition

Animals such as, but not limited to, goats, pigs, sheep and the like.

Proposed Revision

Animals used primarily for the purpose of providing food, clothing, or work. Per head AU values for common livestock animals are provided in Section 8.

11. PROPOSED REVISION**INDUSTRIAL USES**Current Definition

Uses of land which are allowed by right or through the special permit process only in the I-1 or I-2 zoning classifications, as listed in these regulations.

Proposed New Definition

Land, structures, and/or buildings utilized for processes engaging in the mechanical, physical, or chemical transformation of materials, substances, or components into new products, where the new product is finished in the sense of being ready for consumption or utilization in an advanced manufacturing process. Additionally, such industrial uses may be accompanied by research and development and/or the preparing, sorting, packaging, temporary warehousing, and distribution of products. This definition applies to uses not otherwise defined in these regulations.

RECOMMEND CHANGING THE LAST SENTENCE TO “THIS DEFINITION APPLIES TO “USES ALLOWED THROUGH THE SPECIAL USE PERMIT PROCESS”.

12. PROPOSED REVISION**INDUSTRIAL, LIGHT**Current Definition

Place and/or building, or portion thereof, that is used or is intended for the manufacture, (predominantly from previously prepared materials), of finished products or parts, including processing, fabrication, assembly, treatment, packaging, incidental storage, sales and distribution of such products, but excluding basic industrial processing. The term includes furniture production, metal fabrication, apparel manufacturing, printing, and publishing, and the like.

Proposed Revision

Place and/or building, or portion thereof, that is used or is intended for the manufacture, (predominantly from previously prepared materials), of finished products or parts, including processing, fabrication, assembly, treatment, packaging, incidental storage, sales and distribution of such products, The term includes furniture production, metal fabrication, apparel manufacturing, printing and publishing

THE PROPOSED CHANGES FOR LIGHT INDUSTRIAL DISTRICT (I-1) SPECIFY 32 PERMITTED PRINCIPAL USES PLUS A PRIVATE POWER PLANT AS AN ACCESSORY PERMITTED USE LOCATED ON THE SAME LOT WITH THE PRINCIPAL USE. ADDITIONALLY, THERE ARE 6 USES PERMITTED UPON ISSUANCE OF A SPECIAL USE PERMIT, INCLUDING AGRICULTURAL USE OF LAND. NONE OF THE PERMITTED USES INCLUDE AFO/CAFO/FEEDLOTS.

SECTION 8.20 OF THE PROPOSED ZONING SPECIFIES “LIGHT INDUSTRIAL (I-1) ZONING DISTRICT STANDARDS”. THERE ARE 9 STANDARDS LISTED IN THE PROPOSED ZONING

RECOMMEND, AS PER PREVIOUS SUBMITTED COMMENTS, CHANGING AGRICULTURAL USE TO AGRICULTURAL-CROP PRODUCTION & AGRICULTURE-ANIMAL PRODUCTION AS THERE IS A WORLD OF DIFFERENCE IN EFFECTS OF THOSE TWO CATEGORIES.

13. INDUSTRIAL, HEAVY

Current Definition

Place and/or building, or portion thereof, that is used or is intended for the following or similar uses: processing or manufacture of materials or products predominantly from extracted or raw materials; storage of or manufacturing processes using flammable or explosive materials; or storage or manufacturing processes that potentially involve hazardous or commonly recognized offensive conditions; the term includes motor vehicle assembly, oil refineries, textile production, sawmills, post and pole plants, log yards, asphalt and concrete operations, primary metal processing, and the like.

RECOMMEND DELETING "...AND THE LIKE" AS THAT IS TOO VAGUE.

THIS DEFINITION AND THE DESCRIPTION FOR HEAVY INDUSTRIAL DISTRICT (I-2) REMAIN UNCHANGED FROM CURRENT VERSION. THE PERMITTED USES ARE : 1) ALL NON-RESIDENTIAL USES NOT OTHERWISE PERMITTED BY LAW, 2) MEDICAL MARIJUANA REGISTERED PREMISES, 3) MEDICAL MARIJUANA TESTING FACILITIES. ADDITIONAL PERMITTED USES LOCATED ON THE SAME LOT WITH THE PERMITTED PRINCIPAL USE ARE: 1) ONE SINGLE FAMILY DWELLING REQUIRED BY AND INCIDENTAL TO THE OPERATION OF THE INDUSTRIAL ENTERPRISE, 2) AGRICULTURAL USE OF LAND; AGRICULTURAL BUILDINGS. 3) PRIVATE POWER PLANT.

AGAIN, AS PER PREVIOUS SUBMITTED COMMENTS, THE IMPORTANCE OF SEPARATING AGRICULTURAL USE INTO TWO CATEGORIES OF AGRICULTURAL USE-CROP PRODUCTION AND AGRICULTURAL USE-ANIMAL PRODUCTION CANNOT BE EMPHASIZED ENOUGH AS THE EFFECTS ARE VASTLY DIFFERENT.

THERE ARE NO "HEAVY INDUSTRIAL (I-2) ZONING DISTRICT STANDARDS" LISTED! RECOMMEND HAVING SPECIFIC ZONING STANDARDS (i.e. PERFORMANCE STANDARDS) LISTED FOR EACH ZONING DISTRICT.

THERE ARE NO MECHANISMS FOR PUBLIC COMMENT IN THESE USES. RECOMMEND HAVING A MECHANISM FOR "OTHER USES" THROUGH THE SPECIAL USE PERMIT PROCESS THAT WILL ALLOW PUBLIC INPUT.

14. POWER PLANT

Current Definition

A facility that converts one or more energy sources, including but not limited to water power, fossil fuels, nuclear power, or solar power, into electrical energy or steam. A power generation plant may also perform either or both of the following: (a) operation of a transmission system that conveys the energy or steam from the generation facility to a power distribution system; (b) operation of a distribution system that conveys energy or steam from the generation facility or the transmission system to final consumers. For wind energy see Wind Energy Conversion System Definition. For solar energy see Power Plant, Solar.

RECOMMEND EXCLUDING COAL AS AN APPROVED ENERGY SOURCE, SO DELETE "BUT NOT LIMITED TO" AND ADD "...STEAM, AND EXCLUDING ALL SOURCES OF COAL."

THERE IS NO REASON WE CANNOT HAVE REGULATIONS THAT ARE MORE IN ALIGNMENT WITH GREENER ENVIRONMENTAL GOALS.

15. POWER PLANT, PRIVATE

Current Definition

An electrical power generation facility that, regardless of fuel or energy source, is operated by a private property owner or lessee, and whose primary function is the provision of electricity to the permitted use(s) on the site the facility is located

RECOMMEND EXCLUDING COAL AS AN APPROVED ENERGY SOURCE.

16. RENDERING PLANT

Current Definition

Building used for storage and conversion of animal wastes and livestock carcasses into industrial fats and oils, various other products (fertilizer), or to be used for heating and energy production.

CONCERNS

- 1) Rendering plants generate significant volumes of wastewater. The wastewater contains contaminants that cannot be released directly to the rivers, streams, or lakes without proper treatment.
- 2) The rendering industry also has the potential for producing negative impacts on environmental quality. the handling and processing of organic raw materials produce significant amounts of undesirable biodegradable by-products that can have significant impacts on water and air quality.
- 3) The regulation of greenhouse gases and ammonia air emissions and total nitrogen, phosphorus, and dissolved solids wastewater discharges will be challenges in the near future.
- 4) Wastewater from rendering facilities contains the liquid that drains from uncooked raw material, including potentially pathogenic microorganisms.
- 5) There are four basic categories of environmental concerns regarding wastewater generated and discharged by rendering plants: protection of aquatic life, protection of human and animal health, protection of receiving stream aesthetics, and protection of water supply quality. Protection of aquatic life requires the most significant attention and expense in wastewater treatment.

[Source: Sindt, Gregory P.E., Environmental Issues in the Rendering Industry. Bolton & Menk.]

17.SLAUGHTERHOUSE

Current Definition

A building, structure, or facility where livestock and/or fowl is slaughtered and prepared for distribution to butcher shops or retail sales establishments such as grocery stores. A slaughterhouse is designed to accommodate the confinement and slaughtering of live animals to include packing, treating, storage or sale of the product on the premises.

Proposed Revision

A place, building, or structure where small or large livestock are temporarily stabled prior to slaughter and slaughtered. Additional processing may include butchering, preparing, or packing for off-site distribution or temporary storage for on-site sales.

RECOMMEND DEFINING LIVESTOCK AND FOWL SPECIES (i.e. ...WHERE COWS AND/OR CHICKEN, TURKEYS...). STRONGLY RECOMMEND EXCLUDING SWINE.

18.STREAMSIDE SETBACK

Current Definition

A fifty (50) foot setback from any perennial-flowing stream or river to the outer wall of any structure. The established 50-foot setback distance is measured from the ordinary high water mark of the stream or river to the structure.

RECOMMEND A SETBACK GREATER THAN 50 FEET PER GROWTH POLICY ON WATER QUALITY. RECOMMEND SETBACK OF 100 FEET.

GOAL #8: PROTECT SURFACE AND GROUNDWATER QUALITY FROM POLLUTION

OBJECTIVE H. PROMOTE POLICIES THAT ENSURE GREATER SETBACKS FOR COMMERCIAL, INDUSTRIAL AND MULTI-FAMILY DEVELOPMENT TO REDUCE THE RISK OF NEGATIVE IMPACTS.

19.PROPOSED NEW ITEM

VALUE-ADDED AGRICULTURAL COMMODITY PROCESSING FACILITY

Any facility in which one or more agricultural commodities are physically processed in such a way that results in a value-added agricultural product and is not otherwise defined in these regulations.

**RECOMMEND DIVIDING INTO TWO SEPARATE CATEGORIES:
VALUE-ADDED AGRICULTURAL-CROP COMMODITY AND
VALUE-ADDED AGRICULTURAL-ANIMAL COMMODITY**

**RECOMMEND SPECIFYING "LOCALLY-RAISED COMMODITIES" VS
"IMPORTED COMMODITIES". RECOMMEND FOCUSING ON
LOCAL CROP PRODUCTION AND ANIMAL PRODUCTION.**

**RECOMMEND REQUIRING A SPECIAL PERMIT PROCESS FOR
VALUE-ADDED ANIMAL COMMODITY TO ALLOW PUBLIC INPUT.**

20. PROPOSED NEW ITEM**VALUE-ADDED AGRICULTURAL PRODUCT**

An agricultural commodity that has undergone any one or more of the following processes: (1) a change in the physical state or form of the commodity (such as milling wheat into flour, curdling milk in the production of cheese, melting honeycombs to make beeswax); (2) a production process of a manner that enhances its value, as demonstrated through a business plan (such as organically produced products); (3) the physical segregation of an agricultural product in a manner that results in the enhancement of the value of that commodity or product (such as an identity preserved marketing system utilized, for example, in non-GMO products).

21. PROPOSED NEW ITEM**WORKFORCE HOUSING, PERMANENT (LABOR CAMP)**

A place, area, or piece of land where housing is provided for two (2) or more employees or prospective employees of another by any individual, firm, partnership, association, or corporation, that, for a fee, employs persons to render personal services for, or under the direction of, a third person, or that recruits, solicits, supplies, or hires persons on behalf of an employer, and that, for a fee, provides in connection therewith one or more of the following services: (a) furnishes board, lodging, or transportation for such employees or prospective employees; (b) supervises, times, checks, counts, weighs, or otherwise directs or measures the work of such employees; (c) disburses wage payments to such employees

22. PROPOSED NEW ITEM**WORKFORCE HOUSING, TEMPORARY (LABOR CAMP)**

A facility as described under Permanent Workforce Housing except that it provides temporary or seasonal housing for two (2) more employees.

RECOMMEND ELIMINATING TEMPORARY HOUSING DUE TO CONCERNS ABOUT ENCOURAGING AN ITINERANT POPULATION. ALSO, THERE IS NO DEFINITION OF "TEMPORARY".

23. SPECIAL USE PERMIT

Current Definition

A use that would not be appropriate generally or without restriction throughout the zoning classification district but which, if further controlled as to number, area, location, or relation to the neighborhood, would promote the public health, safety, welfare, order, comfort, convenience, appearance, prosperity, or general welfare. Special use permits may be permitted in a zoning classification district if a specific provision for such special use is explicitly listed in the Zoning District Regulations as a special use and a special use permit is issued by the Cascade County Planning Division upon approval of a Special Use Permit by the Cascade County Zoning Board of Adjustment.

SECTION 10.6 LISTS "STANDARDS APPLIED TO ALL SPECIAL USES":

- 1) Conditions may be required that the ZBOA determines if implemented will mitigate potential conflicts in order to reach these conclusions.
- 2) The proposed development will not materially endanger the public health or safety.
- 3) The proposed development will not substantially injure the value of adjoining property or is a public necessity.
- 4) The proposed development will be in harmony with the area in which it is located.
- 5) The proposed development will be consistent with the Cascade County Growth Policy.

RECOMMEND CHANGING #3 TO:" ...WILL NOT SUBSTANTIALLY INJURE THE VALUE OF ADJOINING PROPERTY AND THE ADJACENT COMMUNITY...OR IS A PUBLIC NECESSITY".

USES ALLOWED UPON ISSUANCE OF A SPECIAL PERMIT

1) LIGHT INDUSTRY

- Includes "...agricultural use of land, agricultural buildings..."

2) HEAVY INDUSTRY

- No "Special Use Permit" process
- Includes "All Non-Residential uses no otherwise prohibited by law"

3) MIXED USE-20

- Includes, among other uses, "...airport, agricultural sales, value-added commodity processing facility, permanent workforce housing, temporary workforce housing, agricultural commodity storage facility, wild game processing facility..."

4) MIXED USE-40

- Includes, among other uses, "...commercial feedlot, concentrated animal feeding operation (CAFO), slaughterhouse, rendering plant, value-added commodity processing, airport, bus transit terminal, freight terminal, railroad yards, junk yard, oil & gas exploration, power plant, permanent workforce housing, temporary workforce housing..."

RECOMMEND AS PER PREVIOUS COMMENTS, CHANGING "AGRICULTURAL USES" TO "AGRICULTURAL-CROPS & "AGRICULTURAL-ANIMALS"

24. UNCLASSIFIED USE PERMIT

Current Definition

The Unclassified Use Permit is a permit issued to an applicant by the Cascade County Planning Division after approval from the Zoning Board of Adjustment allowing a particular use, structure or activity not allowed as a matter of right regardless of the underlying zoning district.

SECTION 18. UNCLASSIFIED USE PERMITS

“Unclassified uses shall be subject to all applicable property development standards of the district in which they are to be located an the provisions within this section”.

SECTION 18.1 Uses include, among others, slaughterhouses, concentrated animal feeding operations CAFO), power plant, airport...”

SECTION 18.5 STANDARDS APPLICABLE TO ALL SPECIAL USES

- 1) The proposed development will not materially endanger the public health or safety
- 2) The proposed development is a public necessity or will not substantially impact the value of adjoining property
- 3) The proposed development will be in harmony with the area in which it is located
- 4) The proposed development will ne consistent with the Cascade County Growth Policy

IT APPEARS THAT THE STANDARD “The proposed development will not materially endanger the public health or safety” WAS INADVERTENTLY OMITTED AS IT WAS IN THE SUP STANDARDS.

RECOMMEND ADDING “... WILL NOT IMPACT THE VALUE OF ADJOINING PROPERTY AND ADJACENT COMMUNITIES...”.

THE UNCLASSIFIED USE PERMIT PROCESS IS NOT THE BEST PLACE FOR HIGH IMPACT USES. RECOMMEND MODIFYING THE PLANNED UNIT DEVELOPMENT FOR THESE TYPES OF USES.

RECOMMEND DIRECT APPROVAL/DENIAL AUTHORITY BY OUR ELECTED OFFICIALS FOR UNCLASSIFIED USE PERMITS AND SPECIAL USE PERMITS, RATHER THAN THE APPOINTED ZBOA AUTHORITY CURRENTLY IN PLACE (i.e. “...AFTER APPROVAL FROM THE CASCADE COUNTY COMMISSIONERS...”).

THE ZBOA IS NOT DIRECTLY ACCOUNTABLE TO THE RESIDENTS IN CASCADE COUNTY.

FEEDLOT ISSUES ADDENDUM

CONCERNS ABOUT FEEDLOT AND CAFO/AFO WASTES

Celender, K. *The Impact of Feedlot Waste on Water Pollution Under the National Pollutant Discharge Elimination System (NPDES)*. William & Mary Environmental Law & Policy Review. Volume 33 Issue 3 Article 7, 2009.

[Note: Pages 947-970, 162 scientific research citations. For easier reading I removed the citations]

EXCERPTS FROM THE ABOVE CITATION

Improperly managed CAFO waste "is among the many contributors to remaining water quality problems... [and] has caused serious acute and chronic water quality problems throughout the United States." The EPA only requires NPDES permits for those CAFOs that qualify as point sources of pollution, and does not regulate Animal Feeding Operations ("AFOs") too small to qualify as CAFOs, despite their potential for a collectively significant impact on water pollution. Furthermore, many of the requirements within the NPDES permitting system only apply to large CAFOs, such as effluent limitations," leaving regulation of small CAFOs to state discretion," and making national uniformity in regulation difficult.

The current methods feedlots employ in handling animal waste, such as sprayfields and lagoons, create substantial water pollution problems. Runoff from the sprayfields and lagoons may introduce heavy metals, pathogens, antibiotics, pesticides, and ammonia into ground and surface-water. In addition to numerous adverse effects on human health, contaminated runoff and spills have resulted in multiple fish kills.

Regulation only Applies to Certain CAFOs

The NPDES regulations only require those CAFOs which qualify as medium or large facilities, and in some cases small AFOs with certain characteristics, to meet the federal guidelines for managing animal waste. According to the EPA, the specific condition that triggers the classification of the AFO as a small or medium CAFO will be unique to each site. For this reason, the individualized NPDES permit issued based on the permit authority's best professional judgment seems to control discharge from the facility better. The EPA also mandates that only large CAFOs are subject to ELGs, while the permitting body uses its best professional judgment to set discretionary requirements for small and medium CAFOs. The EPA cites concerns about creating a lesser financial burden on the industry and the economic achievability of the regulations as the reasons for limiting federal regulation to large CAFOs. The recently expanded permitting requirements now apply to a greater number of large CAFOs, and have already added approximately \$335 million to the feedlots' annual operating costs.

Feedlot companies may also have too much flexibility to create their own waste management plans and are not required to use modern technology, such as monitoring groundwater for contamination, to better combat pollution. Additionally, none of the regulations hold the corporations that contract with feedlots liable for any problems arising from waste disposal.

Environmental Risks of Waste Lagoons and Sprayfields

CAFOs routinely spray the liquified animal waste contaminated with pathogens, antibiotics, pesticides, and ammonia onto agricultural land as "fertilizer," which ends up running off "into surface water, killing fish, spreading disease and contaminating supplies of drinking water." Runoff and animal waste (even if applied at appropriate rates) may also contain heavy metals, as well as undigested antibiotics and resistant bacteria, which may seep into groundwater or runoff into nearby surface water.

Higher Nitrate Levels

Water pollution around CAFOs has raised nitrate levels in nearby waters.⁸⁹ Nitrate levels in excess of certain amounts increases the risk in infants of methemoglobinemia ("blue baby syndrome"), a condition capable of causing developmental deficiencies or even death.⁹⁰ High amounts of nitrates in drinking water also correlates with spontaneous abortions in some cases. In addition to causing adverse effects in humans, excess nitrogen levels in water creates surplus algae growth, which chokes out nutrients and sunlight needed by fish and grasses. Thus, high nitrate levels not only extinguish animal and plant life but opportunities for human recreation, such as fishing. In Texas, farm runoff partly made up of animal waste has led to increased nutrient levels in the Gulf of Mexico, creating a "seven thousand square mile 'dead zone' of hypoxia (low oxygen) that cannot support most aquatic life." Hundreds of miles of rivers and streams and approximately 23,700 acres of lakes in Texas have also suffered serious pollution damage, primarily around where feedlots dominate.

Biological Hazards

Biological hazards may also result from improperly managed feedlot waste when bacteria and viruses common in animal fecal matter mix into nearby waters and contaminate swimming and drinking resources. The federal government has failed to provide restrictions on the concentration of microbial content in animal wastes that may permissibly be applied to land, though these restrictions exist for similar application of human wastes. The movement of microorganisms through the soil has also been observed, indicating that other contaminants such as antibiotics and chemicals may be capable of tainting groundwater.

Excessive Application of Wastes

Animal waste is frequently applied to sprayfields in excess of agronomic rates.⁹¹ This excess application contaminates soil, pollutes ground and surface water, harms crops, and wastes nutrients. For example, in September of 1997, runoff from chicken waste applied to a cornfield resulted in the death of over 50,000 fish in the Chesapeake Bay when it caused levels of *Pfiesteria piscida*, a toxic microbe, to rise to dangerous levels.⁹² While small, diversified farms may be capable of using all of the animal waste they produce as fertilizer for their crops, large CAFOs, "whose only 'crops' are animals," cannot possibly ensure appropriate application of waste to the land using agronomic volume standards.

Inherent Risks of Lagoons

While lagoons share many of the same problems as sprayfields, the structure of the lagoon itself poses a set of unique issues. CAFOs oftentimes construct lagoons, which are giant pits that store liquified animal waste, with dirt walls that are prone to rupture. Since the lagoons hold untreated waste, spillage into local water bodies poses a serious threat to water quality and public safety and may release millions of gallons of pollution.⁹³ For instance, in June of 1995, an eight-acre lagoon containing hog waste collapsed and spilt 20 million gallons into New River in North Carolina. Waste lagoons can also lead to the proliferation of insects around CAFOs, such as flies that "breed in manure" and mosquitos that multiply

wherever water collects and remains uncleaned. 106 These pests may not only pose a nuisance, but may threaten the health of livestock and nearby citizens by promoting the spread of disease.'

Negative Impact on Local Residents

CAFOs may decrease property value of nearby residences, forcing long-time citizens to move from the area and can lead to the shutdown of family farms, making the claim that CAFOs enhance local economy questionable. For the most part, CAFOs have a tendency to hire migratory workers at low wages making competition difficult. Additionally, residents neighboring CAFOs have suffered from a higher incidence of certain mental health problems, such as tension, depression, anger, confusion, and fatigue.'

(Note: There are no requirements for small CAFOs/AFOc to have an NPDES Permit)

Proposed Solutions (p.961)

Alternative Approaches to Waste Lagoons and Sprayfields

A few alternative approaches include (1) Treating CAFO/AFO/Feedlot wastewater, 2) Collecting CAFO waste to produce biogas energy, 3) Composting CAFO waste (for dairy) are being researched and have potential. However, the proposed alternatives do not negate the problems associated with ruptured lagoons and over-application of waste on sprayfields. In reality, in order for water pollution problems associated with feedlot waste runoff to be effectively managed and prevented, CAFOs must begin to implement proven alternative methods to manage the mass quantities of animal waste produced.

[Note: These alternative approaches are costly to implement and unless required by regulatory agencies most CAFOs will not attempt to implement).

**THANK YOU FOR READING THIS ABBREVIATED
VIEW OF A 25-PAGE DETAILED ANALYSIS.**

Respectfully submitted,



Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

C.K. Craven 03.15.19
Homeowner, Great Falls



Public Comment Form

Cascade County Public Works Department Planning Division
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Great Falls, MT 59401
Phone: 406-454-6905 Fax: 406-454-6919

Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at planningcomments@cascadecountymt.gov.

Commenter Information

Name: TAMMIE LYNNE SMITH

Complete Address: 397 HIGHWOOD ROAD, GREAT FALLS, MT 59405

Comment Subject (please check one)

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): 2019 Draft Zoning Regulations & Zoning Regulation History

Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

I have reviewed the Draft Zoning Regulations and the history of zoning regulations as presented in the 2017 and 2018 Annual Reports prepared for the Planning Board. The annual reports are well prepared and very informative. I appreciate the time and resources necessary to produce these annual reports and for making them available to the public.

I am opposed to the substantive changes in the 2019 Draft Zoning Regulations due to the lack of cooperative public participation in it's development.

In 2009 the planning division undertook rewriting and updating the zoning regulations. The rewrite process included and encouraged public work sessions and surveys from landowners who would be affected by the proposed changes. This spirit of cooperation and collaboration between the community and county staff set a strong precedent for future zoning, development, and land use issues that were sure to arise as the county land use needs changed. Public participation remained high for the 2012 changes concerning the Flood Road and Military Overlay District changes. However, in recent years the planning division has failed to include or solicit participation from the public during the important developmental stage of zoning regulation updates. In 2016, 2017, and 2018 significant zoning changes were developed and the public was given just 30 days to respond to the changes prior to the Planning Board Hearing. No collaboration between staff and landowners, no surveys for public opinion, and minimal public comment periods for important changes to Unclassified User Permits, Agriculture Uses, and Medical Marijuana all written and passed under the guise of corrections to formatting and compliance with MCA and ARM regulations. I believe the Planning Division and related departments should follow the established legal requirements and historical precedent allowing the public greater participation and opportunity to assist in land use and zoning policies PRIOR to their presentation to the Planning Board.

For Office Use Only

Date Received: <u>3-16-19</u>	Date Reviewed: <u>3-18-19</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Payton, Ian

From: Ron Vihinen <montanaron007@gmail.com>
Sent: Saturday, March 16, 2019 10:31 AM
To: Planning Comments
Subject: Zoning changes

I am a third generation land owner living on the family farm just East of Great Falls. My grandparents, my parents and I have lived there since the early 30's. My parents and grandparents lived and made a living off of this land. We all made improvements to the land including family homes knowing that this land was zoned for agriculture. We made these improvements knowing that the land was zoned for agricultural use and free from massive, intensive, high impact operations such as slaughter houses, feedlots, CAFO, etc.

With the proposed zoning changes, this opens up the door for massive commercial agricultural related operations with no protection for families and the rural communities. Just look what happened to the rural Midwest when the big agricultural related corporations built plants without regard for citizens in the community. They built with one thought in mind (Profit) and with no regard as to what it does to the community, the land and the environment.

I am not opposed to development if the public is informed of the positives and negatives of each project. We should be allowed to vote on it and not allowing a small group of people to make a decision that affects the entire county. It is too easy for a small group of people to be easily influenced or have a conflict of interest.

I love Montana and the rural life it has to offer. I am strongly opposed to the zoning changes with no controls ie. special use permitting. We need controls in our zoning to ensure that large projects are required to provide an impact statement with solutions of how their project will affect traffic, pollution (water and air), schools, housing, and our public welfare costs.

Respectively,

Ronald Vihinen
Resident and Cascade County Land Owner

**FOR OFFICE
USE ONLY**

Date Received: 3-16-19

Date Reviewed: 3-18-19

Complete: Yes No

FOR OFFICE
USE ONLY

Date Received: 3-14-19

Date Reviewed: 3-14-19

Complete: Yes No

March 13, 2019

Cascade County Planning Division
Attn: Alex Dachs
121 4th Street North #2H-21
Great Falls, MT 59401

Re: Proposed Madison Food Park Slaughter Plant

I am writing to vehemently protest and strenuously object to the planned slaughter plant known as Madison Food Park by Friesen Foods, LLC. It is no secret that this industry comprises 8 of the top 20 polluter's in the US and its low wage job offerings force them to recruit and hire among the vulnerable population.

This 3018 acre slaughter plant for pig, chicken and cattle will produce, at full production, 102,995 pounds of solid animal waste daily. It would be stored on site in so called massive anaerobic lagoons the size of 70 football fields directly adjacent to creeks flowing into the Missouri river! This plant plans on waste water spray fields 1,500 acres in size!

What guarantee that this toxic sewage will not contaminate or poison nearby creeks, Missouri river, private water wells and the Madison Aquifer? Where will this waste water go during our cold winters, such as this last February 2019 when temperatures did not go above freezing for 32 straight days? Slaughter plants around the US are constantly being sued for this very reason.

In addition, this plant would use 4.5 million gallons of water daily from the Madison Aquifer. This is the amount of water used by the city of Butte every day! With water being a precious commodity, is this a wise use of our water resources?

All of this just 8 miles east of Great Falls city limits. It is a know fact that slaughter plants produce a foul stench traveling many miles damaging property values and severely damage our quality of life.

The impact to the city of Great Falls will be phenomenal. How will Great Falls citizens handle the over crowding of schools, burdened

medical/fire/police/traffic services? Where will this increase population live given the limited housing and rental market we have now? How are we as citizens going to deal with increased crime?

Who will pay the cost of all the infrastructure needed to accommodate the increase in population? It will be us, the taxpayers! All legitimate questions that are not being addressed.

The Cascade County Commissioners on March 26 want to change the zoning to accommodate this toxic polluting plant. Isn't this change considered spot zoning? I ask as a concerned citizen to stop this change and protect our city and quality of life.

Do not allow the Cascade County Commissioners to change the proposed zoning laws!

A handwritten signature in black ink, appearing to read "Carl Jurenka". The signature is fluid and cursive, with the first name "Carl" being more prominent than the last name "Jurenka".

Carl Jurenka
4119 Central Avenue
Great Falls, MT 59405



Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-2I
Great Falls, MT 59401
Phone: 406-454-6905 Fax: 406-454-6919

Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at planningcomments@casadecountymt.gov.

Commenter Information

* Name: John Dutchat
* Complete Address: 3123 Park Garden Lane, Great Falls, Mont. 59404

Comment Subject (please check one)

- Special Use Permit Application
- Subdivision
- Zoning Text and/or Map Amendment
- Growth Policy
- Variance
- Floodplain Regulation Amendment
- Subdivision Regulation Amendment
- County Road Abandonment/ Discontinuation of County Street
- Other (describe): _____

Comment

See attached sheet.

For Office Use Only

Date Received: <u>3-14-19</u>	Date Reviewed: <u>3-14-19</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TO: Cascade County Planning Division
FROM: **John Dutchak**, 3123 Park Garden Lane, Great Falls, MT 59404
RE: Proposed Zoning Changes

I am writing to you to express my opposition to the proposed zoning changes in Cascade County. The main change I am opposed to is changing all "Agriculture District" zoning to "Mixed Use-20 and Mixed Use-40" zoning. This zoning proposal conflicts with several goals of the Cascade County Growth Policy, such as:

*to protect and maintain Cascade County's rural character and the community's historic relationship with natural resource development.

*to preserve and enhance our rural, friendly and independent lifestyle.

*to assure clean air, clean water, a healthful environment and good community appearance.

*to protect and maintain farming units, because the family farm is important in the economy of Cascade County.

These proposed changes will sacrifice our beautiful open spaces to industrialized and intensive uses with no further public input. Once these changes are made, we will never be able to reverse the damage that is done to our lifestyle and to our environment. I believe that the current proposed zoning changes, and any future proposed changes, should reference the goals, policies and objectives from the Cascade County Growth Policy. I also believe that any "intensive uses" like the proposed Madison Food Park that would have such a huge impact on the community should be put to a vote of the people in the county and not just be left to the Planning Board or the County Commission to decide. It doesn't take a lot of research to find out that there MANY areas of our country that have regretted allowing these large industrial processors into their area. (Please see the enclosed article "Factory Farms Destroy Communities".)

In any zoning changes, a distinction should be made between animal-based and plant-based "Value-Added Processing Facilities" because the impact on the community of an animal-based facility is potentially far greater than that of a plant-based facility. All animal-based facilities should be required to go through a special permit process so that the permits are conditional and public input is considered for each case.

All Cascade County permitting requirements should be based on potential impact on the community. "Permitted" uses allowed by right should only be for low-impact operations in order to simplify the process for small businesses and family farms so that they may develop and grow in the appropriate zones. "Larger in scale" and "intensive" uses (such as CAFOs and slaughterhouses and power plants) should be required to meet higher standards and therefore should be expected to go through a more intensive permitting process with public input.

It does appear to me that the proposed zoning regulations with the "Unclassified Use Permit" are designed to make the process and permit approvals easier for unpopular high impact and intensive operations (such as CAFOs and slaughterhouses), yet more difficult for small businesses (like tourist-based businesses). This is not in the best interest of the people of our community and is totally UNACCEPTABLE!! We expect you to represent the best interests of the people of our community rather than catering to the interests of any large corporation.

There are very good alternatives to large industrialized agriculture (see the enclosed article on "CAFO Alternatives and Solutions"). I believe that all of our zoning should encourage entities such as family farms, organic farms, SPO's (Smart Pasture Operations), and Farm Cooperatives. These would be MUCH better for our economy, our community and the environment than a large-scale slaughterhouse and CAFOs.

It is the standard practice in most counties in Montana to have Agricultural Zoning districts, and to prohibit industrial or manufacturing uses in those AG districts in order to protect encroachment on agricultural land. To ensure the preservation of Cascade County's family farm and ranch community and to maintain our wonderful quality of life here, I strongly urge that the current "A-Agricultural District" be left as it is now and that all properties currently zoned "A-Agricultural" remain in that Zoning District.

Sincerely,



Factory Farms Destroy Communities

By SRAP (Socially Responsible Agricultural Project), 2019

Factory farms, officially called Concentrated Animal Feeding Operations (CAFOs), make the worst possible neighbors. People forced to live close to CAFOs often report becoming [sick from toxic gases](#) produced by decomposing animal waste. They can't even enjoy their own backyards or open their windows on summer nights because the stench from CAFOs miles away is overwhelming. Residents near CAFOs also report an increase in pest infestations, including rodents and swarms of flies. Family and friends often refuse to visit because the smell is so unbearable.

But it's much more than the intolerable smell that impacts rural communities. Manure runoff from CAFOs contaminates streams, rivers, and lakes that were once recreation centers and tourist destinations. Over-application of manure on fields near residences can also cause wells to become contaminated, threatening the health of anyone coming into contact with the water.

CAFOs take a tremendous economic toll on communities, too. Property values plummet whenever a CAFO moves in. Some owners living near CAFOs have filed property tax appeals and won in court, demonstrating that their homes and properties lost significant value due to these industrial-scale facilities. All CAFOs entice communities with the promise of increased tax revenue, but the falling values of the properties surrounding CAFOs negate any promised increase.

Not only do communities lose income when CAFOs move in, they are also forced to increase expenditures on the development and maintenance of infrastructure, especially roads and bridges damaged by heavy CAFO truck traffic. Once a CAFO shuts down, communities are then left with depressed economies, low property values, and costly, often irreparable environmental damage.

Unlike traditional family farms, which purchase feed, supplies, and building materials from local businesses, CAFOs typically purchase everything from outside of the region while paying their workers a very low wage. Consequently, CAFOs provide little to no stimulus for local economies, while imposing prohibitive costs. Wherever CAFOs come in, family farms are driven out of business—and when family farms and the good jobs they provide disappear, rural main streets become ghost towns.

CAFOs are a resource extraction industry, draining the wealth from communities and leaving behind polluted water, foul air, broken roads, and sick residents. The only ones who benefit from CAFOs are their CEOs and corporate shareholders, who profit from polluting the environment, paying workers low wages, treating animals inhumanely, and devastating rural economies.

CAFO Alternatives and Solutions---Phil Anderson Thursday Mar. 3rd, 2016 (From the Duluth, MN READER)

Huge factory farm operations called Concentrated Animal Feeding Operations (CAFOs) are growing in number. The advocates for CAFOs claim they are a necessary, more efficient way to produce cheap food. But is this true? Are there economical alternatives to industrial agriculture?

Opponents to CAFOs, backed up by a growing body of research, say there are better ways to economically raise meat. CAFOs are not the inevitable result of market forces. **Alternative production methods can be economically efficient and technologically sophisticated, and can deliver abundant animal products while avoiding most of the problems caused by CAFOs**

Are Factory Farms more Efficient?

Large CAFOs are not the only farming method that can be efficient or profitable. Recent studies by the U.S. Department of Agriculture (USDA) show that almost 40 percent of medium sized animal feeding operations are about as cost effective as the average large hog CAFO, and many other studies have provided similar results.

In addition CAFOs do not necessarily result in lower prices for meat, milk, and eggs for consumers. The U.S. Department of Agriculture statistics show that retail prices for meat, milk, and eggs have continued to rise, in some cases dramatically, during those periods when animal production was moving off of independent family farms and into contract CAFOs.

CAFOs only appear to be more efficient because they do not account for all the costs of production. Cheap subsidized feed grains are a major hidden advantage. Large factory farms have a tremendous cost to the environment and public health and well being. CAFOs are not more efficient when the environmental costs are taken into account. In addition CAFOs have benefited from taxpayer supported pollution cleanup programs. Public policies that allow overuse of antibiotics at the expense of public health allow CAFOs to exist. In Kewaunee County taxpayers have contributed over \$14.4 million dollars in federal and state subsidies and grants to the CAFOs.

What are the alternatives?

Opponents of CAFOs say smaller operations using a mixture of traditional and new methods can work without the downsides of huge factory farms. There is evidence that operations smaller than CAFOs can be cost-effective. Hog hoop barns, which are healthier for the animals and much smaller than CAFOs, can produce comparable or even higher profits per unit at close to the same price. Research in Iowa has also found that raising hogs on pasture may produce animals at a lower cost than CAFOs. Other studies have shown intensive rotational grazing can produce milk at a cost similar to confined dairy operations, but with added environmental benefits. Pasture operations have lower start up costs. Rotational grazing is resource efficient and does not require energy and capital-intensive inputs such as heating, ventilation, and cooling systems, housing construction, imported industrial feeds, and mechanized manure management systems.

Even traditional family farms could compete with a level playing field. Thousands of family farmers are managing appropriately-scaled, grass-fed meat, dairy and egg farms. One Iowa study said, "It is important to realize that Iowa can raise hogs profitably, sustainably, and humanely without incurring the costs that now burden county governments. Iowa has over 1,000 hoop structures that raise hogs on deep bedded straw without resorting to inhumane confinement, industrial manure disposal, and tax breaks. Iowa independent hog producers also raise hogs for natural livestock producers such as Niman Ranch, Organic Valley, Patchwork Farms, Eden Pork, and a number of other "alternative" and "niche market" hog brands. **With the consumer trend toward natural and organic foods, farmers can see a profit while employing sustainable practices that have minimal negative environmental impact**

Better Solutions

Farm cooperatives have traditionally been a way for small farmers to better compete. **Strengthening this proven organizational solution could be better for communities, small farmers, and the environment. Many smaller farmers provide more economic boost to a local area than large operations. There is a growing desire by consumers for locally grown food. Few large CAFOs sell products locally without going through distant middlemen.**

Nostalgia for the good old days of small family farms is not necessarily the answer. Many small farms operations are not good at handling manure run off. They are just smaller and less noticeable. But the huge size of many CAFOs is inherently a problem. We must find solutions that meet the needs of local communities, consumers, and the environment. If we don't we may find that "cheap" food can be very expensive.



Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-2I Great Falls, MT 59401
Phone: 406-454-6905 | Fax: 406-454-6919
Email: planningcomments@cascadecountymt.gov

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Commenter Information

Name: Carolyn K. Craven

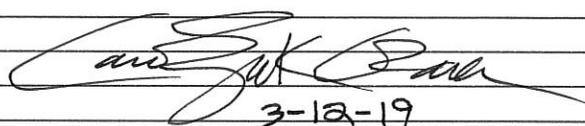
Complete Address: 101 14th Avenue South, Great Falls MT 59405

Comment Subject (please check one):

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): Proposed Zoning Changes Cascade County

Comment

Please see attached written comments. Thank you!


3-12-19

For Office Use Only			
Date Received:	<u>3-12-19</u>	Date Reviewed:	<u>3-12-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

March 12, 2019

PUBLIC COMMENTS ON CASCADE COUNTY PROPOSED CHANGES

Excerpts From **CASCADE COUNTY GROWTH PLAN**

GOAL #1 Sustain & strengthen the economic being of Cascade County Citizens.

B. Stabilize and diversify the county's tax base by encouraging the sustainable use of its natural resources.

C. Identify and pursue primary business development that complements existing business, which is compatible with communities and utilizes valuable assets. Identify and pursue targeted business development opportunities to include, but not limited to, manufacturing/heavy industry, telecommunications and youth/social services.

D. Promote the development of cultural resources and tourism to broaden Cascade County's economic base.

One of the above goals is "primary business development that complements existing business, which is compatible with communities...". Before proposing any zoning changes, did anyone ask the "public" – the citizens of our communities and rural areas in the county what our visions would be?

The tourism we have would likely decline with these proposed zoning regulations. The types of industries being promoted in these mixed use zoning districts are not in alignment with the sustainable use of natural resources, development of cultural resources, and tourism.

GOAL #2 Protect & maintain Cascade County's rural character and the historic relationship with natural resource development

A. Foster the continuance of agriculture & forestry in recognition of their economic contribution and the intrinsic natural beauty of grazing areas, farmlands and forests

B. Preserve Cascade County's scenic beauty and conserve its forests, rangelands and streams, with their abundant wildlife and good fisheries.

C. Preserve Cascade County's open space setting by encouraging new development to locate near existing towns and rural settlements and by discouraging poorly designed land subdivisions and commercial development.

D. Assure clean air, clean water, a healthful environment and good community appearance.

Many of the proposed zoning changes have revolved around animal production including feedlots, slaughterhouses, rendering plants, butcher shops, etc. These and some other heavy industries, including refineries, do not “preserve the intrinsic natural beauty of grazing areas, farmlands and forests”, and they do not “preserve the scenic beauty and conserve rangelands and streams with their abundant wildlife and good fisheries”. They also do not “assure clean air, clean water, a healthful environment and good community appearance.

The United Nations’ four-hundred page report, “Livestock’s Long Shadow” and other research studies confirm that livestock production is in the “top three environmental contributors, leading to environmental problems, including increased greenhouse gas emissions, land degradation, water pollution, and increased health problems”.

GOAL #3 Maintain agriculture economy.

- A. Protect the most productive soil types.
- B. Continue to protect soils against erosion.
- C. Protect the floodplain from non-agricultural development

These proposed changes allow heavy industries to use our most productive soils, with possible outcomes of overuse and

GOAL #5 Preserve and enhance the rural, friendly and independent lifestyle currently enjoyed by Cascade County Citizens

These increased industries throughout the county in mixed use areas are not preserving “the rural, friendly and independent lifestyle enjoyed by Cascade County Citizens”, which includes clean water, clean air, open spaces and communities that are culturally rich, friendly and welcoming.

GOAL #8 WATER QUALITY: Protect surface & groundwater quality from pollution.

These proposed zoning changes do not thoughtfully provide any protection for our pure water, prime farming land, clean air and incredible water resources. Reviews of large animal production industries reveal dead zones, polluted water, irreparable land damage, and toxic air. Increasing heavy industrial uses seems like a 19th century approach to future growth and environmental stewardship.

GOAL #9 WORKING LANDSCAPES: Foster the heritage of the area in agriculture and forestry in recognition of their economic contribution and the intrinsic natural beauty of grazing areas, farmlands and forests.

“The heritage of the area in agriculture....and the intrinsic natural beauty of grazing areas and farmlands...” speak about maintaining environmentally friendly, smaller sustainable farms, thereby preserving the intrinsic beauty of natural grazing areas and farmlands. Smaller sustainable farms typically are in harmony with the environment. Interestingly, the 2014 Growth Policy also states “every effort should be made to protect and maintain farming units, because the family farm is important in the economy of Cascade County”.

Concentrated animal feeding, slaughter operations, and ancillary industries historically pollute land, water and air and irreparably alter and destroy the intrinsic natural beauty of grazing areas and farmlands. (per numerous peer-reviewed published research articles).

The goals in the 2014 Growth Policy were originally adopted in 1982 and most recently affirmed in 2006 and 2014. As stated by our county leadership, “These goals continue to provide the best overall direction for county planning.”

GROWTH POLICY-CHAPTER 5- ECONOMIC CONDITIONS

FINDINGS

- ❖ The “family farm” is Cascade County’s predominate form of agricultural operation.
- ❖ The trend toward farm consolidation is slowing. Recent studies suggest the return after taxes of a 1,200 acre and a 1,500 acre wheat farm to be about the same per acre.
- ❖ There appears to be sufficient capital for present farming units to increase their size of operation.

ECONOMIC ACTIVITY AND CONSTRAINTS

1. Commercial and manufacturing uses should be encouraged, if such uses do not adversely affect agriculture and are located around and in existing rural communities.
2. Every effort should be made to protect and maintain farming units, because the family farm is important in the economy of Cascade County.
4. Efforts should be made to discourage commercial strip development along major thoroughfares.

5. Efforts should be made to stabilize and develop employment and economic activity.
6. Environmental as well as economic perspectives should be considered in any future development.
7. Efforts should be made to attract non-transportation sensitive industry to Cascade County.
8. Utilization of locally produced agricultural products and raw materials should be encouraged.
11. Encourage future development to locate on non-productive or marginally productive agricultural land.
12. Minimize, to the greatest degree possible, the adverse social and environmental impacts of development and encourage beneficial effects of orderly growth.
13. Encourage economic activities to locate in those areas most economically, socially and environmentally appropriate, as determined by the County Planning Board and other public agencies.

- 1) Recommend the Planning Board & Planners revisit these well stated goals directly above.**
- 2) Recommend the Planning Board & Planners access information about the deleterious effects of these large animal production industries on the environment and on the social fabric of communities.**
- 3) Recommend the public be invited to participate in the process of the Growth Policy and then new Proposed Zoning Changes.**

The following excerpts are from extensive peer-reviewed research I have read on the topic of large scale animal processing.

A 2008 Pew Commission report concluded: “Economically speaking, studies over the past 50 years demonstrate that the encroachments of industrialized agriculture operations upon rural communities result in lower relative incomes for certain segments of the community and greater income inequality and poverty, a less active “Main Street,” decreased retail trade, and fewer stores in the community.”

A 2006 study commissioned by the State of North Dakota Attorney General’s Office reviewed 56 socioeconomic studies documenting the economic impacts of industrial agriculture in general on rural communities. The studies consistently “found detrimental effects of industrialized farming on many indicators of community quality of life, particularly those involving the social fabric of communities.” [28] The only kinds of economic development attracted to “industrial agricultural communities” are other environmentally polluting and socially degrading industries. **This is not sustainable economic development; it is industrial economic exploitation.**”

Respectfully submitted,



Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405



Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-2I Great Falls, MT 59401
Phone: 406-454-6905 | Fax: 406-454-6919
Email: planningcomments@cascadecountymt.gov

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Commenter Information

Name: Carolyn K. Craven

Complete Address: 101 14th Avenue South, Great Falls MT 59405

Comment Subject (please check one):

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): Proposed Zoning Changes Cascade County

Comment

Please see attached written comments. Thank you!

Carolyn K. Craven
3-8-19

Multiple horizontal lines for handwritten comments.

For Office Use Only			
Date Received:	<u>3-12-19</u>	Date Reviewed:	<u>3-12-19</u> Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Carolyn K. Craven
101 14th Avenue South
Great Falls, MT 59405

March 8, 2019

PUBLIC COMMENTS ON CASCADE COUNTY PROPOSED ZONING CHANGES

- 1) **Process:** I have concerns about the process used to develop these proposed zoning changes. The MCA requires review of the county growth policy at least every five years and the most recent growth policy review was in 2014. It appears that zoning changes should be in alignment with the growth policy, so the 2019 revision of the growth policy should be completed with public input before any zoning changes are proposed. The 2017 MT Code Annotated requires both city and county zoning changes be “made in accordance with the growth policy”. [Title 76, Chapter 2, Part 2 County Zoning, Part 3 Municipal Zoning).
- 2) **Legal Descriptions:** The Zoning Ordinance (Section 14.1.1(3)) requires a legal description for the boundaries of each property affected by the proposed changes and I do not see that.
- 3) **Public Comments:** Additional time is needed for analysis of these extensive zoning changes and for adequate public comment. This is not a process that can be expedited and there is an historical precedent to allow the public an appropriate opportunity to provide informed input. The additional legal descriptions must be included and the public should have access to all records of the planning department, including the previous versions of these proposed zoning changes, the individuals involved in making these changes, the review and revision procedures and the rationale behind the changes.

RECOMMEND: At least one more evening meeting in three-four weeks for public comments and questions. This issue has significant far-reaching impacts and most of our population is not even aware of these changes.

- The Montana Constitution states: “Section 8: Right of Participation. The public has the right to expect governmental agencies to afford such reasonable opportunity for citizen participation in the operation of the agencies prior to the final decision as may be provided by law”. Article II, Section 8.
- 4) **Agricultural Use:** The proposed changes have eliminated Agricultural Use zoning and replaced it with Mixed Use 20 and Mixed Use 40, which allows light and heavy industry. I am strongly opposed to these current proposals as many industries, power plants, slaughterhouses, etc. have a much greater possibility of having adverse environmental and social impacts than family farms, natural cattle grazing pastures, plant-based agriculture or commercial zoning. Having MU20, MU 40 available in previously zoned agriculture land is not acceptable. Recommend keeping the current Agriculture zoning we have as the proposed changes will allow open spaces to be developed by industrialized and intensive uses, often with significant environmental and health effects, and without public input.

5) **Agricultural Use:**

Current Definition: The use of land for periodic livestock sales and the like, tree farming or growing or producing field crops, livestock, and livestock products for the production of income, excluding feedlots. Field crops include, among others, barley, soy beans, corn, hay, oats, potatoes, rye, sorghum, and sunflowers. Livestock includes, among others, dairy and beef cattle, goats, horses, sheep, hogs, poultry, game birds and other animals including deer, rabbits, and mink. Livestock products include, among others, milk, butter, cheese, eggs, meat, fur, and honey.

Proposed Definiton: The use of land for crop production, animal production, aquaculture, apiculture, entoculture, or forestry.

Recommend having two separate definitions: Agricultural Use-Crop Production and Agricultural Use-Animal Production.

Agricultural Use-Crop Production

The use of land for tree farming or growing or producing field crops for the production of income. Field crops include, among others, barley, soy beans, corn, hay, oats, potatoes, rye, sorghum, and sunflowers.

Agricultural Use-Animal Production

The use of land for animal production, including livestock and livestock products, aquaculture, apiculture, and entoculture for the production of income, excluding feedlots. Livestock includes, among others, dairy and beef cattle, goats, horses, sheep, hogs, poultry, game birds and other animals including deer, rabbits, and mink. Animal products include, among others, milk, butter, cheese, eggs, meat, fur, and honey.

NOTE: Feedlots would be a separate, definition, category, and management.

This is the current definition of "Agriculture" in the Cascade County Subdivision Regulations. Of note is that there is no mention of feedlots I this document. Also of note is that there is not even a definition of "Agriculture" in the current zoning or the proposed zoning changes.

AGRICULTURE --- Cascade County Subdivision Regulations July 11, 2018

All aspects of farming or ranching, including the cultivation or tilling of soil; dairying; the production, cultivation, growing, harvesting of agricultural or horticultural commodities; raising of livestock, bees, fur-bearing animals or poultry; and any practices including forestry or lumbering operations, including preparation for market or delivery to storage, to market, or to carriers for transportation to market.

Thank you for your consideration of these comments and recommendations.

Respectfully submitted,





Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-2I
Great Falls, MT 59401
Phone: 406-454-6905 Fax: 406-454-6919

Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form.

Commenter Information

Name: THOMAS A. BAIZ, JR

Complete Address: 117 W. GROVE ST. #204 MISHAWAKA IN 46545

Comment Subject (please check one)

- Special Use Permit Application
- Subdivision
- Zoning Text and/or Map Amendment
- Growth Policy
- Variance
- Floodplain Regulation Amendment
- Subdivision Regulation Amendment
- County Road Abandonment/ Discontinuation of County Street
- Other (describe): _____

Comment

SEE ATTACHED LETTER

For Office Use Only

Date Received:	<u>3-12-19</u>	Date Reviewed:	<u>3-12-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Cascade County Planning Dept.
121 4th St. North, Suite H/I
Great Falls MT 59401

8 March 2018

Dear Planning Board,

I am deeply connected to Cascade County. It's where my wife was born, and where we raised our children. We have family in Great Falls. Though I'm not living here now, I come back often. In many ways, it's home.

As a retired Great Falls attorney, I appreciate the effort that went into this substantial revision to Cascade County's Zoning Regulations.

These proposed regulations, however, are ill-timed, opaque, and too comprehensive.

Why now? A cursory Google search of "Mixed Use Zoning" yields no results for rural planning — online references are relevant only to urban examples. Where did this idea come from? Please provide your sources of information and inspiration, along with a list of existing rural areas that replaced "Agricultural Zoning" with "Mixed Use." How has that worked out for other rural areas?

The protocol for this huge change is open to criticism and perhaps legal action. Why should it be easier for Cascade County officials to change the entire 181-page Zoning law than it is for one individual to attempt a change within a single parcel? Why is Cascade County exempt from the processes it mandates others to follow? Zoning Ordinance Section 14.1.1 details the process for citizens who want or need a zoning change. This ordinance requires a detailed analysis submitted by staff *prior to the hearing*. Why has this important step been omitted?

While I appreciate the hard work it took to write over 200 pages of zoning revisions, it's important to openly establish guiding principles, determine the need for change, and be optimistic that updated policies will help Cascade County thrive in challenging times.

According to Montana Code Annotated (MCA) 76-1-601, Cascade County's Growth Policy requires a review every five years. Please solidify a broader policy before enacting substantial zoning changes.

I urge the Planning Board and County Commission to reject this zoning change, and to try to articulate a common vision through a mandated Growth Policy Review.

Sincerely,



Thomas A. Baiz, Jr.

tombaizjr@gmail.com

Attorney at Law, Retired

117 W Grove Street, Apt. 204

Mishawaka IN 46545

Payton, Ian

From: janstony@3rivers.net
Sent: Monday, March 11, 2019 11:25 AM
To: Planning Comments
Subject: Revisions to zoning regulations

Good morning,

I am concerned about possible zoning revisions perhaps opening the way for an industrial sized slaughterhouse to emerge east of Great Falls. I think landowners and their neighbors should definitely have input as to whether their land remains classified "agricultural" or is re-designated as "mixed use." And I feel very strongly that there is an environmental difference between a low-impact and a high-impact operation, a difference between a plant based operation and an animal based operation. A high-impact large animal facility should have to meet different standards than a small-plant based operation. The two entities should be treated separately in terms of zoning considerations. I trust the planning board has reviewed its Growth Policy and recalls what our goals and vision for this community have been and are. I have nightmare visions of what could happen to our valuable resource of plentiful and clean water if we endanger and corrupt it with inevitable leakage and the smell of football field-sized lagoons.

The ramifications of any huge change to a community require deep thought about future ramifications.

Sincerely,

Janet Carter
2005 3rd Ave N
Great Falls, MT 594



Date Received: 3-11-19

Date Reviewed: 3-11-19

Complete: Yes No

Cascade County Planning Dept.
121 4th St. North, Suite H/I
Great Falls MT 59401

4 March 2019

Dear Planning Department:

Though I spent nearly all my life in Montana, at the moment I'm in the Midwest, helping my husband care for his elderly parents.

I am learning more than I wanted to know about senior care, which is not surprising. I'm more surprised by what I'm learning about how poor planning is tearing the heart of the heartland.

According to the February 27, 2019 issue of *The American Conservative*, "The decline of rural communities and consolidation of the American food system was the result of deliberate policy choices ...made by politicians from both parties who favor multinational corporations at the expense of rural communities. Rural America can thrive once again, but only if we're willing to challenge ... the current system."

We need better planning, from the ground up.

There's no way our grandparents would call what I am seeing in the Midwest "agriculture" — thousands of confined protein units under one metal roof, consuming and excreting, flank-to-hoof. This isn't Yankee ingenuity; it's corporate servitude: farmers have to sign up or go under. China's Smithfield and Brazil's JBS rule the roost — and wallow in the profits — from Iowa to South Carolina.

Though it may be too late to stop this in the Midwest and Southeast, we can make better planning decisions here in Cascade County.

Big changes often begin with benign words — a few tweaks to definitions ... in the case of new zoning regulations, by displacing the word "Agriculture" with "Mixed Use."

This zoning proposal's allowance for "intensive" and "larger scale" development may wind up being a de-facto zone change.

Cascade County needs to discover, protect and promote what we have.

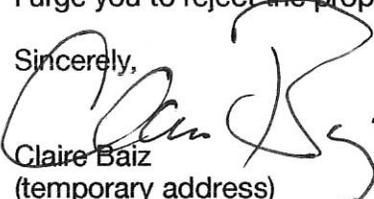
I'm seeing for myself: Big Ag is a bad neighbor.

This wholesale re-write of Cascade County's zoning regulations would be a potent disincentive for sustainable development — at the worst possible time. While Conrad just got a large oilseed plant and a commitment to hemp processing, while organic ag is growing by double-digits in Montana, does Cascade County want to open its arms to an industry that, by its very nature, precludes sustainable agriculture?

A broad alliance of landowners, neighbors, family farms, Conservatives, Progressives, environmental groups, water conservation organizations and more will stand our fertile ground against what amounts to a zone change for every parcel currently designated "Agricultural" to "Mixed Use."

I urge you to reject the proposed changes to Cascade County's Zoning Regulations.

Sincerely,


Claire Baiz

(temporary address)
117 W Grove St. #204
Mishawaka IN 46545



Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-2I
Great Falls, MT 59401
Phone: 406-454-6905 Fax: 406-454-6919

Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at planningcomments@casadecountymt.gov.

Commenter Information

Name: Shannon E. Guilfoyle

Complete Address: 13 Homestake Ln, Great Falls, MT 59405

Comment Subject (please check one)

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): _____

Comment

I oppose the adoption of the Cascade County Planning Department's staff-initiated zoning changes for the following reasons:

1) As a landowner in Cascade County, I want the land surrounding my rural home to maintain its agricultural zoning status. I do not agree with the "mixed-use" designation; specifically, MU-20 and MU-40, as my surrounding neighbors own over 40 acres and I have every right to expect that my neighbors would be required to participate in a permitting process when considering a "Value-Added Agricultural Commodity Processing Facility" on their land.

2) "Unclassified Use Permits" should be reviewed by BOTH elected officials and the Zoning Board of Adjustments. A direct approval/denial of permits by the officials directly accountable to the residents of Cascade County is highly advised.

The Planning Board needs to recommend denial of the proposed zoning changes and complete the review of the Cascade County Growth Policy as required by (MCA) 76-1-601 (3)(f) PRIOR to reviewing proposed changes to zoning within Cascade County.

For Office Use Only

Date Received:	3-15-19	Date Reviewed:	3-19-19	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-21
Great Falls, MT 59401
Phone: 406-454-6905 Fax: 406-454-6919

Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form.

Commenter Information

Name: KATHRYN A MILLER

Complete Address: 10 HOMESTAKE LANE GT FALLS MT 59405

Comment Subject (please check one) (mailing: PO Box 7486 59406)
only

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): RE: Proposed Revisions to Cascade County
Zoning Regulations

Comment

Of great concern to me is the appearance of not following the zoning ordinance protocols for amendments/changes per current legal process.

The current growth Policy was adopted in 2014 and the proposed changes are premature of the 5 year review outlined in the Cascade Co. Growth Policy.

The Cascade Co Zoning Ordinance requires detailed analysis of any changes and so far the process is using a "Broad Brush" to propose future changes for a large amount of acres affecting many Cascade County residents.

The proposals also offer very vague terminology to describe the proposed areas. These changes will effect many residents of Cascade Co, our ground water, air quality + property values.

Please to NOT Rush this process - TAKE CARE with

For Office Use Only			
Date Received:	<u>3-19-19</u>	Date Reviewed:	<u>3-19-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

the proposals!



Public Comment Form

Cascade County Public Works Department Planning Division
121 4th St N, Suite 2H-2I
Great Falls, MT 59401
Phone: 406-454-6905 Fax: 406-454-6919

Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at planningcomments@casadecountymt.gov.

Commenter Information

Name: Alyce Reichert
Complete Address: 1409 4th Avenue South, Great Falls, MT 59405-2415

Comment Subject (please check one)

- Special Use Permit Application Subdivision Zoning Text and/or Map Amendment
- Growth Policy Variance Floodplain Regulation Amendment
- Subdivision Regulation Amendment County Road Abandonment/ Discontinuation of County Street
- Other (describe): ZONING CHANGES

Comment

please see attached letter

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Date Received:	<u>3-19-19</u>	Date Reviewed:	<u>3-19-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Cascade County Planning Dept.
121 4th St. North, Suite H/I
Great Falls MT 59401

March 9, 2019

Dear Planning Department:

It was a daunting task for me and 99 fellow Montanans: we had a legislative mandate, hard-fought elections, extensive preparations, and 60-days of public debate to write Montana's 1972 Constitution.

Then we had to convince Montanans that our new Constitution was worth their vote.

Our 27-page Constitution replaced a 57-page document that had been written to favor big interests — primarily big copper — back in 1889. The mandate for change was obvious.

Who is pressing for extensive changes in Cascade County's zoning regulations in 2019? Eliminating Agricultural Zoning devalues our heritage, our economic base, and our future.

While I commend the County — and especially the volunteer members of the Zoning Board — for their effort, the public needs more time to understand and respond.

Why do we need these changes — and why now?

With only two hearings and the distraction of the legislative session in Helena, there has not been enough time to understand the motivations and consequences of over 200 pages of tracked changes to Cascade County's 181-page Zoning Regulations.

We need more time, more community education, greater solicitation for public input, more convenient hearing times and a more rigorous protocol for passage of sweeping changes.

With the withdrawal and impending re-application for a massive, controversial Special Use Permit (SUP), I worry that the hasty passage of zoning changes might add unnecessary fuel to what is sure to be a rough fight regarding industrial agriculture.

I learned as a delegate to the Montana Constitutional Convention that positive change requires a clear mandate, open meetings, succinct explanations, and plenty of opportunity for public input.

I respectfully request that the need for, and rationale behind, these changes in zoning regulations be publicly demonstrated.

Sincerely,



Arlyne Reichert
Delegate, Montana Constitutional Convention
Former Montana State Legislator
1409 Fourth Avenue South
Great Falls, MT 59405

cc: Cascade County Commissioners Larson, Weber & Briggs