



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> 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@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov).

## Commenter Information

Name: Peter & Patricia Wooldridge/ Hidden Canyon Lodge (Upland Angler Lodge, LLC)

Complete Address: 2629 Old US Highway 91, Cascade MT 59421

## 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 REVISIONS - MU area close to Prewett Creek

## Comment

Please see attached email with comments. Thank you.

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### For Office Use Only

Date Received:	<u>2-8-14</u>	Date Reviewed:	<u>2-11-14</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Feb. 8, 2019

Cascade County Planning Department and Board  
Comment on Rezoning Proposal

To The Cascade County Planning Division & Board,

We own the Upland Angler Lodge LLC, DBA Hidden Canon Lodge at 2629 Old US Highway 91, Cascade, Montana 59404, which is currently operating under a special permit (Outfitter and Guide Facility).

Previously, the property was opened in 1990 and operated by Rick Pasquale (known as The Fly Fishers Inn). This property was also operated under a special permit (Outfitter and Guide Facility), and it offered guide and lodging services under that permit. It also operated as dining facility for area clients, outdoorsman and tourists alike, under a restricted headcount.

When we purchased the property, we met with various county planning division members (including Environmental Quality, Sanitation, Public Health, and multiple Planning staffers) and asked for guidance as to which permits were required to operate the facility in the same manner in which Mr. Pasquale operated the Fly Fishers Inn. Based on that guidance, we procured an Outfitter and Guide Facility Permit. We did our due diligence properly, and understood we were operating under the current county guidelines.

Unfortunately, as we approach our third season, county regulators now are questioning our operations, specifically as it pertains to allowing area residents and tourists to join us for dinners. The county does not appear to have a problem with us serving dinner to local outfitters and their guests. They understand that we have stayed within our head count guidelines as required by Environmental Quality and Sanitation. The county recognizes we work with multiple outfitters and their clients in the area, and the county understands we serve as a Booking Agent for outfitters as designated.

By rezoning the area from agricultural to mixed use, we believe it would allow us to work with the county regulators to find a solution to our current situation. The property has always operated under a specific headcount to ensure environmental safeguard. We are committed to continuing to operate in that manner as we value our environment and habitat of the Missouri River.

It is our philosophy and intent to operate in a manner that promotes growth in the area. We run a seasonal business, with a restricted headcount. We made an investment based on those factors. We also acted in reliance on our discussions with county regulators, that we would be able to pursue outside dinner operations within that headcount regulation. We maintain our core staff on an annual basis, not because we have to, but because employee continuity is healthy for our business, and more importantly, it is healthy for the local community the employees live in (our employees are not filing for unemployment in the off season, they have the ability to become permanent fixtures in their community, and in turn support the local economy year round).

To us, the importance of creating a mixed use area is that it allows us to be a supportive vehicle for growth in the area. By allowing us to expand more broadly into the dining arena, the county opens new avenues to support the local economy. Currently, the County interpretation of guidelines is to restrict our dining availability to existing outfitter relationships. The regulations state we are to operate "in conjunction with" outfitters, but somehow "in conjunction with" has been interpreted as "incidental to." We are not and do not wish to be "incidental to." We are and wish to continue working "in conjunction with," not only our local outfitter partners, but also with local area businesses.

By allowing us to operate in a mixed use fashion, we are able to advertise more broadly. We can partner more easily with our local communities and businesses (such as Malstrom AFB, United Way of Cascade County, Providence University, Benefis, Great Falls Rescue Mission, Humane Society, non-profit angling oriented groups, and community foundations, which all have already benefited from our partnerships and donations). Our intimate setting that lends itself to small groups (and fosters an environmentally sensitive stewardship), uniquely allows us to help promote area businesses as they find our facility a useful tool during their recruitment process (exposing potential employees to recreational benefits, culture, history and other hidden gems of the area). Local businesses have requested the use our facility for office parties and end of the season celebrations, as owners look to show employees gratitude for the year's hard work. We have business inquiries, looking for us to provide a unique entertaining experience in order to engage potential business partners or vendors. We want to offer something different to the area, while maintaining good stewardship of the nature and environment around us and promoting/introducing the unique experiences outside our doors to tourists and locals alike.

With that in mind, mixed use will also allow us to better serve the ever expanding outdoor recreation industry on which a great deal of Montana business relies (there is a great deal of research on this, but a recent article is referenced below). We currently work with and promote local tourist industry businesses (Central Montana Travel Planner, Lewis and Clark Interpretive Center, First Peoples Buffalo Jump State Park, GOSHAWK Ecotours, Adventure Caravans Inc., CM Russell Museum among others, not to mention all the local vendors we support). As we have been approached by area businesses such as these and others (which are outside the outfitting arena) to provide dining options for their various groups traveling in and around the area, Mixed Use designation would help us enhance their client experience, and in turn foster growth in those areas already identified as viable resources by the State/County (i.e Cascade County's Development & Growth Plan).

The outfitting and guide community is already extremely cut-throat, and restricting our advertizing/client base to a limited pool of existing outfitter relationships hampers area growth and opportunity. By supporting a facility like ours to operate in a mixed use fashion, we can openly engage not only locally but also outside the traditional demographic. We believe creating opportunities to engage the non-fishing community helps us introduce that community to all the great experiences the local area has to offer. This would allow us to source new relationships for our local outfitting community, and those new clients would likely visit the area fly shops, gas stations, grocery stores, various state parks, etc...

In short, mixed use fosters responsible growth in the area. The local residents want places they can go to without narrow restrictions. People from Helena and Great Falls call to dine with us, as they pass through from a day out on the lake, river, or trails. Tourists staying in local AirBNBs or camping stop by all the time looking to have dinner. Unfortunately, instead of welcoming them with Montana Hospitality, we have to turn them away. Those are important missed touch points for the community

at large. Missed opportunities to introduce both members of the angling community, and just as importantly, the non-angling community to all the area has to offer. We happily promote so many area businesses and public resources - scenic tours with GOSHAWK Ecotours, fishing with local outfitters

and fly shops, horseback riding, state parks like Tower Rock/First Peoples Buffalo Jump/Gates of the Mountain, and Lewis and Clark Interpretive Centers, and wildlife viewing to name a few.

We want to support this great area, great people and all it has to offer. The rezoning proposal will provide us the local government support we need to remain a part of this community.

Regards,

Peter and Patricia Wooldridge  
Owners, Hidden Canyon Lodge  
2629 Old US Highway 91, Cascade MT 59421  
[hiddencanyonlodge@gmail.com](mailto:hiddencanyonlodge@gmail.com)

Article referenced above:

[https://missoulian.com/news/local/outfitted-and-guided-experiences-drive-tourism-revenue-in-montana/article\\_92c6a516-2273-5da5-97bc-589007caaf62.html?utm\\_medium=social&utm\\_source=email&utm\\_campaign=user-share](https://missoulian.com/news/local/outfitted-and-guided-experiences-drive-tourism-revenue-in-montana/article_92c6a516-2273-5da5-97bc-589007caaf62.html?utm_medium=social&utm_source=email&utm_campaign=user-share)

Re: Public comment re zoning revisions from Peter and Patricia  
Wooldridge, Upland Angler Lodge LLC DBA Hidden Canyon  
Lodge

*This article is referenced in our comment - this is the web page  
and the content is copied for your convenience below.*

[https://missoulian.com/news/local/outfitted-and-guided-experiences-drive-tourism-revenue-in-montana/article\\_92c6a516-2273-5da5-97bc-589007caaf62.html?utm\\_medium=social&utm\\_source=email&utm\\_campaign=user-share](https://missoulian.com/news/local/outfitted-and-guided-experiences-drive-tourism-revenue-in-montana/article_92c6a516-2273-5da5-97bc-589007caaf62.html?utm_medium=social&utm_source=email&utm_campaign=user-share)

UM STUDY

## **Outfitted and guided experiences drive tourism revenue in Montana**

- KEILA SZPALLER keila.szpaller@missoulian.com
- Dec 2, 2018



Floaters enjoy a quiet reach of the Middle Fork of the Flathead River that passes through the heart of the Bob Marshall Wilderness Complex. The river was one of the inspirations for the federal Wild and Scenic Rivers Act.

Outfitting and guiding are bringing significant and growing dollars to Montana, according to a new report from the University of Montana's Institute for Tourism and Recreation Research.

Last year, spending on outfitters and guides hit \$374 million by nonresidents, or 11 percent of all visitor spending, according to the study. It reached the fourth-highest spending category by nonresidents, surpassed only by fuel, restaurants and lodging.

Jeremy Sage, economist and associate director of the institute, said one takeaway from the report is the growing importance of "experience-based tourism." The report is called "Montana's

Outfitting Industry: 2017 Economic Contribution and Industry-Client Analysis," and it is available online.

"We're not just selling stuff," said Sage, lead researcher of the study. "We're selling experiences, and Montana has lots of experiences. The more we can provide quality ones ... the more we can demonstrate the demand for Montana."

The findings come from a survey distributed to 1,090 email recipients, with a response rate of 35.6 percent, or 388. Of all respondents, 89 percent indicated "they provided some type of outfitting or guiding service in 2017."

The study noted a shift in outfitting and guiding. In the past, the industry was tied closely to hunting, fishing and rafting, but in recent years, it has grown to include other activities "of the Montana outdoor recreation experience." The report cited horseback riding and wildlife viewing as examples.

Mac Minard, executive director of the Montana Outfitters and Guides Association, agreed the experiences available in Montana are bringing tourists. He said even llama trekking, or classes in long-range shooting or Dutch oven cooking, can be draws for visitors.

"They're looking for an experience, not a destination," Minard said.

The report said outfitters and guides served more than 700,000 clients last year, and 63 percent of those were from outside Montana. The study counted the amount of money visitor groups who hired guides spent at \$791 million.

Although the total amount is large, Minard said in rural economies such as Glasgow and Sidney, outfitting has a disproportionate benefit. In fact, he said that in discussions with tourism advisory councils, he has come to believe future sustainable tourism in rural economies will be tied heavily to the outfitted experience.

"It may be the lifeline of those communities economically," Minard said.

Sage also discussed spreading the wealth across Montana. As the industry takes hold and grows in the state, he said it will be important to minimize the "concentration of impacts" and maximize the shared benefit.

"I think a key to it is understanding how we work to distribute these visitors and their activities across the state," Sage said.

The institute looked at the industry more than a decade ago, and Sage said one significant change is that people are spending more money on outfitted or guided experiences than on retail. The report described the change and impact:

"In recent years, nonresident visitor spending on outfitters and guides has surpassed that of spending on retail goods, making it the fourth-highest spending category behind only fuel, lodging, and dining out. This rise comes despite only 5 [percent] to 6 percent of the visiting population taking part in these activities.

"This observation reiterates findings from the 2007 Montana Outfitter and Guide study characterizing the outfitting industry as high value, low impact. The high value is generated via the high average daily spending (\$481) compared to the average visitor (\$128) as well as the extended length of time spent in the state (7.28 days) compared to the average visitor (4.73 days).

"The low impact is a statement to the low volume of visitors making up the high economic contribution."

The report also noted that 39 percent of all clients took part in water trips, such as rafting or kayaking adventures. "Fishing was the next highest client volume activity," said a news release about the report. "By revenue generated from the outfitters and guides, fishing and hunting outfitters stood above all others, with 33 and 24 percent of all outfitting revenues, respectively."

The report itself also cited factors that could "limit or deter" visitors from coming to Montana in the future, such as extended fire seasons. "If this trend of prolonged and damaging fire seasons continues, many of the businesses surveyed expressed concerns over their ability to adapt."

The study also noted "rivers in Montana have experienced their own battles with Mother Nature in recent years." It examined a specific temporary closure of a portion of the Yellowstone River and its tributaries due to an invasive parasite along with low water, high temperatures and recreational pressure.

"Should the need to increasingly curtail or restrict water-based recreation arise, significant economic impacts are likely to be felt across the region," the report said.

The study also cited a 2016 U.S. Department of Agriculture report on recreation trends projected through 2030. "Overall, 14 of 17 activities showed average declines in total days of participation when accounting for climate change. The percentage point decline was greatest for three activities: snowmobiling, undeveloped skiing (cross-country skiing, snowshoeing), and floating (canoeing, kayaking, rafting), accounting for average net decreases of 39, 36, and 9 percentage points, respectively."

Currently, the report about Montana notes fishing represents the largest "revenue generating trip types for the outfitters and guides themselves" at \$76 million, and it cites hunting at \$55.3 million. It also notes that 90 percent of fishing clients and 85 percent of hunting clients are from outside the state.

## Report highlights

Highlights from "Montana's Outfitting Industry: 2017 Economic Contribution and Industry-Client Analysis":

- More than 700,000 individuals took a guided or outfitted trip in 2017 in Montana.
- Visiting groups who took a guided trip spent on average \$3,501 per trip, while the average visiting group spends \$606.

- In 2017, 5.4 percent of all visitors participated in a guided trip and spent \$791 million while in Montana, accounting for nearly a quarter of all visitor (spending).
- Water based activities including rafting/floating/canoeing/kayaking (283,600 clients) and fishing (160,400 clients) represent the largest guided trip sectors when ranked by volume of clients.
- Fishing (\$76.7 million) and hunting (\$55.3 million) represent the largest revenue generating trip types for the outfitters and guides themselves. 90 percent and 85 percent of these clients, respectively, are from out-of-state.
- 61 percent of outfitted or guided trips that were land based took place on public lands.
- 28 percent of water based guided and outfitted trips accessed the waterways through a Montana Fish, Wildlife, and Parks Fishing Access site.

*Source: Institute for Tourism & Recreation Research at the University of Montana*



# Public Comment Form

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 121 4th St N, Suite 2H-21  
 Great Falls, MT 59401  
 Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: KAREN CARLSON  
 Complete Address: 346 Stockett Rd, Sand Coulee, MT 59472

## 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:  
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For Office Use Only			
Date Received:	<u>2-5-19</u>	Date Reviewed:	<u>2-5-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Karen Carlson  
346 Stockett Road  
Sand Coulee, MT 59472

Re: Zoning Text and/or Map Amendment

Comment:

After reading the policy draft, I do want to say that a lot of work was put into all the changes. I realize that everything has to reflect MCA and ARM. There are many improvements to the old policy.

My concern is that the new policy seems to ensure that we get the slaughterhouse and CAFOs. According to partial MCA 76-2-203, 1. Zoning regulations must be: (b) (ii) promote public health, public safety, and general welfare (iii) adequate provisions of transportation, water and sewage 2. In the adoption of zoning regulations, the county commissioners shall consider: (a) reasonable provision of light and air (b) effect on motorized & non motorized transportation systems, (d) the character of the district and the suitability for particular uses. I do not want Great Falls to be known as a cesspool!

Other parts of the country are suing the large industrial Ag companies that have compromised their water, air and land.

Great Falls has worked too hard to bring companies here to allow all the negatives that come with the slaughterhouse and CAFOs. Property values have gone down in the parts of the country that have slaughterhouses and CAFOs. I hope you take into consideration the people that will move if the slaughterhouse and CAFOs are allowed into Cascade County. Crime rates in slaughterhouse communities have increased due to the type of workers that are employed by slaughterhouses. The Sheriff's budget will have to be increased. I can't imagine driving up 10<sup>th</sup> Avenue South and it being lined with feces and urine. This alone will cause the City of Great Falls to increase their budget to keep our roads clean. Also, schools will have to provide teachers for students with English as a Second Language. These are just a few samples of extra costs to our County and schools. The extra costs will exceed the monies brought in by this type of industry. It makes you want to follow the money since we, the tax payers, will loose and have to pick up the tab. I hope you contact the people of Brooks Alberta before a decision is made.

Please remember the purpose of a planning board per partial MCA 76-1-102:

(1) It is the object of this chapter to encourage local units of government to improve the present health, safety, convenience, and welfare of their citizens and to plan for the future development of their communities to the end that highway systems be carefully planned; that the needs of agriculture, industry, and business be recognized in future growth; that residential areas provide healthy surroundings for family life; and that the growth of the community be commensurate with and promotive of the efficient and economical use of public lands.

I politely ask that the Public hearing of February 19 be kept open for public testimony due to the complexity of the zoning changes. The public needs time to understand how they will be effected. Please schedule future meetings until after 5:00pm to give the working people a chance to attend.

Thank you for your consideration!

*Karen Carlson*

**Payton, Ian**

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**From:** BONNIE WARREN <bonniewarren4@hotmail.com>  
**Sent:** Sunday, February 3, 2019 9:33 PM  
**To:** Planning Comments  
**Subject:** East-side Slaughter house.

I oppose the re-zoning of this area to accommodate this project! It would negatively effect the City of Great Falls due to it's negative impact our air quality and the water table that flows into Giant Springs. As far as I can tell there would be no positive impact on our or the surrounding area and communities. Thank you for not changing nor allowing this business to come into our county.

Bonnie Warren

4428 4 th Ave N

Great Falls, MT. 59405.

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FOR OFFICE  
USE ONLY

Date Received: 2/4/19

Date Reviewed: 2/4/19

Complete:  Yes  No

**Hopkins, Sandor R.**

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**From:** Kim Wermling <riversedgeasstlv@gmail.com>  
**Sent:** Monday, January 28, 2019 5:10 PM  
**To:** Planning Comments  
**Subject:** A Community Residential Facility with 9 or more residents.

I am writing in support of the proposed rule change. I have been waiting on said rule change so that I can correct the error made when the initial application was processed.

Kim Kraus-Wermling  
Owner/ Administrator  
River's Edge Assisted Living  
4800 Lower River Road  
Great Falls, MT 59405  
406-952-0262

FOR OFFICE  
USE ONLY

Date Received: 1-28-19  
Date Reviewed: 1-28-19  
Complete:  Yes  No

**Payton, Ian**

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**From:** Sandee <sandeelou@charter.net>  
**Sent:** Sunday, February 10, 2019 1:51 PM  
**To:** Planning Comments  
**Subject:** zoning changes

I am concerned that the time of the day you hold meetings does not allow for most of cascade residents to attend. When there is a matter that is as big and important as zoning changes (that could allow for a slaughterhouse and factory farms) that meeting should be held when residents can attend. Please consider an evening meeting so interested people have an opportunity to be involved. I would also ask that you announce in the news what you are proposing and get public comment before any changes are made. Transparency is needed in this issue to have a well informed community that you represent and supports your decisions.

Thank you,  
Sandee Christensen  
1312 41<sup>st</sup> St S  
Gt Fall, MT 49405

Sent from [Mail](#) for Windows 10

FOR OFFICE  
USE ONLY

Date Received: 2-10-19  
Date Reviewed: 2-11-19  
Complete:  Yes  No



# Public Comment Form

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

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## Commenter Information

Name: Marilyn Kind  
Complete Address: 581 Goon Hill Rd 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): Friesen Food Park / Slaughterhouse

## Comment

I favor businesses that benefit & support the Great Falls community and surrounding areas rather than supporting one profit mongering business at the expense of the community and surrounding areas and Montana at large. I am not in favor of the slaughterhouse. I am in favor of living a healthy life in an environment that guarantees my right to clean air and clean water in my pursuit of happiness.

I appreciate your consideration of my comment in hopes that you are willing and able to do the right thing for the community of people you represent. Please keep the Feb 19<sup>th</sup> hearing open for public testimony and continued through March.

Sincerely,

Marilyn Kind

## For Office Use Only

Date Received:	<u>2-6-19</u>	Date Reviewed:	<u>2-6-19</u>	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

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**Name:** Duane Culver

**Complete Address:** 63 Hidden Valley Lane, Sand Coulee, MT

**Comment Subject (please check one)**

Special Use Permit Application

Subdivision

Zoning Text and/or Map Amendment

XO Growth Policy

**O Variance**

**Floodplain Regulation Amendment**

**County Road Abandonment/ Discontinuation of County  
Street**

**Subdivision Regulation Amendment Other (describe):**

**Comment:**

**I am extremely concerned about some of the proposed zoning changes for Cascade County and am very curious as to what has prompted these changes and who proposed them.**

**Also I am requesting that the meeting scheduled for Feb. 19 allow for public comment and be continued in March to allow adequate preparation for commenting on the proposed zoning changes. This meeting and all future open meeting should be scheduled for no earlier than 5 PM on weekdays to make it possible full public comment. When you suppress public attendance by scheduling morning meeting it makes people suspicious.**

**For Office U**

se Only Date Reviewed: 2-6-19

Date Received: 2-6-19

Complete:

Yes

No



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## Commenter Information

Name: Marie May

Complete Address: 74 Hidden Valley Ln Sand Coulee, MT 59472

## 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): Planning Board Hearing Feb. 19, 2019

## Comment

I request that the hearing on Feb. 19, 2019 allow for public testimony and be continued to March 2019 to allow for adequate preparation of public comment on the proposed zoning changes.

Additionally I request the March and any additional hearings be scheduled after 5:00 p.m on weekdays to allow for full public participation.

### For Office Use Only

Date Received:	<u>2-5-19</u>	Date Reviewed:	<u>2-5-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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**Payton, Ian**

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**From:** Skari & Sons Inc Skari <askari@itstriangle.com>  
**Sent:** Friday, February 1, 2019 3:54 PM  
**To:** Planning Comments

FOR OFFICE  
USE ONLY

Date Received: 2/4/19

Date Reviewed: 2/4/19

Complete:  Yes  No



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## Commenter Information

Name: Robbie L Regennitter  
Complete Address: 620 Stockitt Rd, Sand Center, MT 59472

## Comment Subject (please check one)

- Special Use Permit Application
- Subdivision
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- Growth Policy
- Variance
- Floodplain Regulation Amendment
- Subdivision Regulation Amendment
- County Road Abandonment/ Discontinuation of County Street
- Other (describe): \_\_\_\_\_

## Comment

I would like to request the hearing on Feb 19  
specifically allow for public comment and be continued to  
March 2019 to allow for proper preparation of my comments  
on proposed zoning changes. I would also like the hearing  
to be scheduled after 5:00pm so I could participate.

### For Office Use Only

Date Received:	<u>2-4-19</u>	Date Reviewed:	<u>2-6-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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planningcomments@  
cascadecountymt.gov

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: Deborah Jenkins

Complete Address: 298 Hastings Road, Sand Coulee, MT 59472

## 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): Planning board public hearings

## Comment

1) Please keep the public meeting scheduled for 2-19-2019 as an informational meeting and open for public testimony only, not to make any determination and close prematurely. Continue until at least May

2) I request that you change these public hearing meeting times to be held after 5:00 pm on a weekday to accommodate working residents that would like to participate in our local government decision such as this. Starting with the March meeting, please change all meeting times to evenings.

3) I am not sure if all supporting documents and materials have been posted on the county website and request that they are. Myself and other public citizens need time to review all changes and related materials to we can understand the implications and effects on our community. Adequate time and information is reasonable to ask for.

Thank you.

### For Office Use Only

Date Received:	<u>1-24-19</u>	Date Reviewed:	<u>1-24-19</u>	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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

## Instructions

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## Commenter Information

Name: Karen Slotness  
Complete Address: 13 Willow Run Lane 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

## Comment

I hereby request:

- 1) Planning board hearing presently scheduled for Feb 19, 2019 to be delayed to allow for additional time for the public to review the changes requested and prepare for the hearing.
- 2) The Hearing scheduled on Feb 19<sup>th</sup> 2019 specifically allow for public testimony and be continued to March 2019 for adequate preparation of public comment on the proposed zoning changes.
- 3) The March 2019 hearing and any future hearings be scheduled after 5pm on weekdays to allow for full public participation. Thank you for your consideration  
Karen Slotness

### For Office Use Only

Date Received:	<u>2-15-19</u>	Date Reviewed:	<u>2-15-19</u>	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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: Richard P. Slotness

Complete Address: 13 Willow Run Lane 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

## Comment

I hereby request:

1. Planning board hearing be delayed to allow additional time for the public to review the changes and prepare for the hearing.
2. The hearing scheduled on Feb 19<sup>th</sup> 2019 specifically allow for "public testimony" and be "continued" to March 2019 for adequate preparation of public comment on the proposed zoning changes.
3. The March and any further hearings be scheduled after 5:00 pm on weekdays to allow for full public participation

For Office Use Only			
Date Received:	<u>2-15-19</u>	Date Reviewed:	<u>2-15-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	



# Public Comment Form

Cascade County Public Works Department Planning Division

121 4<sup>th</sup> St N, Suite 2H-2I

Great Falls, MT 59401

Phone: 406-454-6905

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## Commenter Information

Name: Dana D. Rossmiller

Complete Address: 330 Hastings Road, Sand Coulee, MT. 59472

## 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): Agricultural zoning change to Mixed Use 20 + 40

## Comment

I think this is a significant change that will affect virtually every landowner in Cascade County. I don't feel that the public (landowners) has been informed about this major change that will have an impact on their property values. I think the public should be made aware of this proposed change through newspaper, TV and even mailed notices to all landowners. They should be informed and have the opportunity to have input on things that affect their property.

This proposed change should be delayed until the property owners have been informed and been given the opportunity to voice their opinions. Decisions like this should not be made in closed rooms by a few people, when it affects every property owner.

### For Office Use Only

Date Received: <u>2-14-19</u>	Date Reviewed: <u>2-14-19</u>	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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: TAMMY KANTOROWICZ

Complete Address: 746 HIGHWOOD RD 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): ZONING CHANGES FOR CASCADE COUNTY

## Comment

I AM REQUESTING THE PLANNING BOARD MEETING ON FEBRUARY 19, 2019 TO BE DELAYED SO MYSELF AND OTHER MEMBERS OF THE PUBLIC HAVE ADDITIONAL TIME TO REVIEW THE EXTENSIVE CHANGES AND PREPARE FOR THE HEARING. I AM REQUESTING THE HEARING CURRENTLY SCHEDULED FOR FEBRUARY 19, 2019 TO ALLOW FOR PUBLIC TESTIMONY AND BE CONTINUED TO MARCH 2019 FOR ADEQUATE PREPARATION OF PUBLIC COMMENT ON THE PROPOSED ZONING CHANGES. I AM REQUESTING THE MARCH HEARING AND ANY ADDITIONAL HEARINGS SCHEDULED AFTER 5:00 PM TO ALLOW FOR FULL PUBLIC PARTICIPATION

### For Office Use Only

Date Received: <u>2-14-19</u>	Date Reviewed: <u>2-14-19</u>	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 4<sup>th</sup> St N, Suite 2H-2I  
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## Commenter Information

Name: PLAINS GRAINS LIMITED PARTNESHIP

Complete Address: 149 BICKFORD RD, 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): FEBRUARY 19, 2019 ZONE CHANGE HEARING

## Comment

WE WOULD LIKE TO GO ON RECORD AS REQUESTING THE MEETING OF 2-19-19 BE CONTINUED TO MARCH 19, 2019 TO ALLOW FOR PUBLIC PARTICIPATION WITH ADEQUATE PARTICIPATION OF PUBLIC COMMENT ON PENDING ZONE CHANGE.

ALL HEARINGS OF THIS MAGNITUDE MUST ALSO BE SCHEDULED FOR AFTER 5:PM ON WEEKDAYS SO COUNTY RESIDENTS CAN COMMENT.

THANK YOU

### For Office Use Only

Date Received:	<u>2-13-19</u>	Date Reviewed:	<u>2-13-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
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## Commenter Information

Name: RONALD D. SCOTT  
Complete Address: 93 HASTINGS RD CASCADE COUNTY MT

## 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): PLANNING BOARD HEARING

## Comment

We are requesting the hearing on Feb 19<sup>th</sup> specifically allow for public testimony and be continued to March 2019 for adequate preparation of public comment on the proposed zoning changes. The public needs more time to digest all the new changes.

We request the March and any additional hearing be scheduled after 5:00 pm on weekdays to allow for full public participation. Most people will not be able attend a 9:00 AM weekday meeting.

For Office Use Only			
Date Received:	<u>2-13-19</u>	Date Reviewed:	<u>2-13-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	





# 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

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## Commenter Information

Name: ROBERT AND EARLYNE LASSILA  
Complete Address: 149 BICKFORD RD, 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

## Comment

WE UNDERSTAND THERE IS A SCHEDULED HEARING ON FEB 19, 2019.  
WE DO HEREBY REQUEST SAID MEETING BE CONTINUED TO  
MARCH 19, 2019, AT LEAST. SAID MEETING SCHEDULE SHOULD  
ALLOW FOR PUBLIC TESTIMONY WHICH SEEMS TO DICTATE THAT  
AFTER 5:00 PM ON WEEK DAYS IS BEST FOR FULL PUBLIC  
PARTICIPATION. IN THESE IMPORTANT MATTERS.  
THESE ZONING CHANGES AFFECT THE WHOLE COUNTY SO  
PUBLIC INPUT IS DEFFINATLY NEEDED.  
THANK YOU FOR YOUR CONSIDERATION.

### For Office Use Only

Date Received:	<u>2-12-19</u>	Date Reviewed:	<u>2-12-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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To the Cascade County Planning Board -

You may want to make these corrections in your new "Cascade County Zoning Regulations" booklet.

p.3 - Table of Contents  
Use # 7.11 instead of 7.1 for Industrial (I) District General Requirements.

This same error is repeated on p. 108, where the heading is numbered 7.1 instead of 7.11.

p.7 - section 1.1 Purpose of Regulation Adoption  
on line 9, standards is misspelled (standards).  
" to establish adequate standards for the provision of light, air, and open space."

Sincerely,  
Nancy Dutchak  
2-15-19

FOR OFFICE  
USE ONLY

Date Received: 2-15-2019

Date Reviewed: 2-18-2019

Complete:  Yes  No



**Public Comment Form**

Cascade County Public Works Department Planning Division  
Addressed to: Cascade County Planning Board

**Commentor Information**

Name: Nancy Dutchak  
Address: 3123 Park Garden Lane; Great Falls, MT 59404  
Date: February 15, 2019

**Commentor Subject**

Zoning Text and/or Map Amendment/ esp. regarding the proposed Madison Food Park

**Comment:**

I have some very grave concerns about the slaughterhouse that is proposed for a site east of Great Falls. I have been doing lots of research on slaughterhouse towns, and nothing that I have read is good. If you google "positive effects of slaughterhouses on communities" you come up with ZERO results, and only negative effects appear. As a matter of fact, most of what I have read is downright ALARMING!!

According to an extensive study done by the University of Iowa in 2005, the evidence suggests that host communities for slaughterhouses do experience some growth in employment, but the job growth tends to be concentrated in low-paying jobs. The negative wage effect of counties with meat-packing and processing swamps the positive employment effect. The result is that meatpacking employment grows at the expense of employment growth in other sectors of the economy. Is this what we want for Great Falls? No decent high-wage paying company will ever want to come to Great Falls once we become known as a slaughterhouse town. Therefore, this would not be an economic boon for Great Falls, but economic devastation.

The bad economic effects of this large slaughterhouse is bad enough, but even worse would be our decreased quality of life due to air, water, and land pollution, terrible odors, increased crime, increased low-income housing, increased truck traffic, over-burdened medical care and social services, and decreased property values. Already people on the east side of town are having problems trying to sell their houses, and I have heard of a number of people who will leave Great Falls if the Madison Food Park is built. Don't we want Great Falls to be someplace that is inviting to visit and pleasant to live in, rather than a place that is scorned and pitied because of the poor quality of life we will have if this project is allowed to go through?

The worst losers of all would be the poor people who work at the slaughterhouse. The people who work at large slaughterhouses have the highest rate of accidents and sickness than any other manufacturing job. That is probably why the turnover rate at these facilities approaches 90% every year. Why would we want to have a business in Great Falls that is so dangerous, unhealthy and unpleasant for the workers, and one that most of us would not want our children to work at? We can do so much better than this!!

I have included several articles with this comment form to back up my statements. One is from [www.foodandwaterwatch.org](http://www.foodandwaterwatch.org), another is from [www.sustainabletable.com](http://www.sustainabletable.com), and the third one is an article from the Natural Resources Defense Council.

I have also included portions of the proposed Cascade County Zoning Regulations, and I have highlighted those sections that show the purpose of the Cascade County Planning Board is to promote, improve and protect the public health, safety, comfort, convenience and the general welfare of the people and property owners of Cascade County. I do not believe that this proposed project meets those standards, and I urge you to just say NO to this large-scale slaughterhouse. It would change our community for the worse and we would never recover from all of the bad effects. All slaughterhouses allowed in the county should be limited to employing 100 people or less (TOTAL employees, not per shift, and including office workers, floor workers and administration). Please do your own diligent research on how large slaughterhouses negatively affect communities, and then do the right thing for the people of Great Falls. Remember, you represent all of us and are elected to do what is right for the majority of Cascade County, and not just do what is beneficial to a large company in Canada and perhaps a few local investors.

*Sincerely, Nancy Dutchak*

**From the Cascade County Zoning Regulations**  
**SECTION 1. PURPOSE 1.1 Purpose of Regulation Adoption**

These regulations are adopted for the purpose of promoting, improving and protecting the public health, safety, comfort, convenience and the general welfare of the people and property owners within Cascade County exclusive of incorporated cities and towns. The fulfillment of this purpose is to be accomplished by seeking the following objectives:

To provide for compatible urban growth in the vicinity of cities and towns that at a minimum must include the areas around municipalities:

To ensure proper living and working conditions and to prevent the development of blight and slums;

To establish adequate standards for the provision of light, air, and open spaces;

To facilitate the provision of adequate transportation, and of other requirements and services such as water, sewerage, schools, open space, and parks;

To zone all properties with a view to conserving the value of buildings and encouraging the most appropriate use of land throughout Cascade County;

To protect residential, business, commercial, and industrial areas alike from harmful encroachment by incompatible uses and to ensure that land allocated to a class of uses shall not be usurped by inappropriate uses;

To avoid the inappropriate development of lands and provide for reduction of flood damage;

To fix reasonable zoning standards to which buildings and structures shall conform;

To prevent such additions to, and alterations or remodeling of, existing buildings or structures as would not comply with the restrictions and limitations imposed herein;

To foster a more rational pattern of relationship between residential, business, and industrial uses for the mutual benefit of all;

To isolate or control the location of unavoidable nuisance producing uses;

To define the powers and duties of the administrative and enforcement officers and bodies; and

To prescribe penalties for any violation of the provisions of this ordinance, or of any amendment thereto.

**1.2 Interpretation, Conflict with Other Laws**

In their interpretation and application, the provisions of these regulations shall be held to be minimum requirements, adopted for the promotion of public health, safety and the general welfare. Whenever the requirements of these regulations are at variance with itself or the requirements of other lawfully adopted rules, regulations, or resolutions, the most restrictive, or that imposing the higher standards shall govern.

**PLANNING BOARD**

The Cascade County Planning Board, authorized under §76-1-101, MCA, and tasked with an advisory role for ensuring the promotion of public health, safety, morals, convenience, or order for the sake of efficiency and economy in the process of community development.

**SPECIAL USE PERMIT**

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.

**8.18 LANDSCAPING REQUIREMENTS**

The Cascade County Commission, in order to provide for a healthy community and environment, a more pleasant living environment, increased property values, and to provide for a lasting social, economic,

environmental, and aesthetic benefit to the county, has enacted the following landscaping requirements for all C, I-1, I-2, MU, and MH and as otherwise required in these regulations. The general purpose of these requirements is to make the county more attractive and aesthetically pleasing, promote and improve public health and safety through the abatement of noise, glare of lights, dust, and air pollution, ensure that land uses of different intensity have sufficient buffering between them to minimize negative effects, promote economic development by providing a high quality of life, enhance ambient environmental conditions by providing shade, air purification, oxygen regeneration, groundwater recharge, storm water runoff retardation, and heat abatement.

## 8.20 LIGHT INDUSTRIAL (I-1) ZONING DISTRICT STANDARDS

All operations shall:

(1) store all raw material, finished products, machinery, and equipment, including company owned or operated trucks and motor vehicles, within an entirely closed building or sight-obscuring fence, berm, or other such improvement no less than six (6) feet in height unless waived or modified by the Zoning Administrator. This shall not preclude display areas for sales;

(2) emit no excessive obnoxious odors;

(3) exhaust no excessive waste into the air or create excessive dust by the industrial operation;

(4) discharge no untreated sewage or industrial waste into any streams or on open grounds without approval of said system by the appropriate authority

## 10.6 STANDARDS APPLICABLE TO ALL SPECIAL USES

Before the Board of Adjustment can approve any Special Use Permit, it must first reach each of the following conclusions:

(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. Considerations are the following: a. Traffic conditions in the vicinity, including the effect of additional traffic on streets and street intersections, and sight lines at street intersections and approaches. b. Provision of services and utilities, including sewer, water, electrical, telecommunications, garbage collections, and fire protection. c. Soil erosion, sedimentation, and storm water runoff. D. Protection of public, community, or private water supplies, including possible adverse effects on surface waters or groundwater

(3) The proposed development will not substantially injure the value of adjoining property or is a public necessity. Considerations are the following: a. The relationship of the proposed use and the character of development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved. b. Whether the proposed development is so necessary to the public health, safety, and general welfare of the community or County as a whole as to justify it regardless of its impact on the value of adjoining property. (4) The proposed development will be in harmony with the area in which it is located.

Considerations are the following: a. The relationship of the proposed use and the character of development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.

<https://www.foodandwaterwatch.org/problems/factory-farming-food-safety>

Factory farms pollute the environment and our drinking water, ravage rural communities, and harm the welfare of animals—while increasing corporate control over our food.

## **Factory Farming & Food Safety**

Factory farming is an unsustainable method of raising food animals that concentrates large numbers of animals into confined spaces. Factory farms are not compatible with a safe and wholesome food supply. It's time to ban factory farms.

### **How did we get here?**

Over the past three decades there has been an economic and geographic shift in how and where food animals are raised in the United States. Large scale factory farms have replaced small or medium scale farms that raised dairy and beef cattle, hogs, chickens and turkeys. The rise of factory farming has been driven by three factors: unchecked corporate power, misguided farm policy, and weak environmental and public health regulations.

### **Factory Farming Increases Corporate Control of our Food**

As the number of companies that farmers sell livestock, eggs or milk to has decreased due to mergers and increasing consolidation of the food industry, the number of dairy, hog and beef cattle producers in the United States has also declined sharply over the last 20 years. The meatpacking, milk and egg processing industries have become more controlled by just a handful of big players and the remaining farms raising food animals have grown bigger. In the chicken industry, contract farming is now the norm-- meaning farmers sign up with a corporate integrator that provides the animals and the feed and micromanages the day-to-day operations on the farm-- often through the use of unfair one-sided contracts. The real price farmers receive for livestock has trended steadily downward for the last two decades. Most farmers barely break even. [Learn more about corporate control in our food system.](#)

### **Bad Public Policy Facilitates Factory Farming**

Misguided farm policy has artificially reduced the cost of feed. Since the passage of the 1996 farm bill, farm policy has encouraged overproduction of crops such as corn and soybeans. This overproduction harms family farms by reducing the value of these crops and forcing farmers to plant additional acreage in order to make a living. While this overproduction is bad for family farmers, it's a boon to the corporate agribusinesses that purchase these crops for use in animal feed and creates an indirect subsidy to the meat industry.

### **Waste From Factory Farms: An Environmental and Public Health Crisis**

For several decades, the U.S. Environmental Protection Agency and state governments have failed to regulate the environmental impacts of factory farms. When factory farms operate virtually unregulated the environment and nearby rural communities pay the price. The vast quantities of manure from factory farms can — and do — make their way into the local environment where they pollute air and water. Several municipal water systems in the midwest where many factory farms are located must regularly implement costly clean up techniques to remove factory farm pollution from the water supply in order to avoid public health disasters. Likewise, pollution from factory farms runs off into streams that feed into our major waterways like the Chesapeake Bay, Great Lakes and [Gulf of Mexico](#)—contributing to algal blooms and dead zones that impact water supplies and destroy aquatic ecosystems, recreation and livelihoods.

Small, diversified farms that raise animals alongside other crops have always used manure as fertilizer without polluting water. The difference with factory farms is scale. They produce so much waste in one place that it must be applied to land in quantities that exceed the soil's ability to absorb it as fertilizer.

### **Factory Farms Threaten Public Health**

[Factory farms contribute to the rise of antibiotic-resistant bacteria.](#) Every single day, factory farms feed animals routine, low doses of antibiotics to prevent disease in filthy, crowded living conditions. In fact, 80% of the antibiotics used in the U.S. are by agriculture. Overuse of antibiotics creates conditions for bacteria to develop resistance to them, and when these antibiotic-resistant bacteria spread to humans either in our food supply, via animal to human transfer on farms, or through contaminated waste they can cause serious or even deadly antibiotic-resistant infections in people. Over two million Americans suffer from an antibiotic-resistant infection every year, and 23,000 people die. The FDA has known about the misuse of antibiotics since the 1970s, but has not required factory farms to stop this dangerous practice.

## **Factory Farms Create Food Safety Risks**

The stressful, crowded conditions of factory farms make it easy for disease to spread, which can also lead to food safety risks. When thousands of beef cattle are packed into feedlots full of manure, bacteria can get on their hides and then into slaughterhouses where bacteria on even one animal can contaminate thousands of pounds of meat. In 2010, the crowded, unsanitary conditions at two Iowa egg companies caused a recall of more than half a billion potentially Salmonella-tainted eggs.

What's worse is that our government, at the urging of the biggest companies, is trying to essentially deregulate the inspection system for meat and poultry by allowing company inspectors to replace government inspectors, and allowing companies to increase line speeds making it nearly impossible to ensure that all birds and carcasses are closely inspected before heading to processing.

## Community and Economy ([www.sustainabletable.com](http://www.sustainabletable.com), Grace Communications Foundation)

Agribusiness' large-scale and [factory farms](#) not only produce foods that can be harmful to our [health](#) and [local environments](#), they also negatively affect a community's [economy](#). With claims that its presence will create new jobs, invest in local business, and increase property value, many communities open their arms to these farms. Recent experience, however, has shown that when large-scale farms enter communities, replacing small farms, they can actually create an economic downturn.

### Job Access

As recently as 2008, the US agricultural industry consistently experienced record profits, <sup>E</sup> but this agricultural boom did not create more opportunities for the average farmer or rural worker. The percentage of the rural workforce employed on farms dropped by about half throughout the 1980s and 1990s <sup>E</sup>and continues to fall in 2008 to under 2% of the US labor force. <sup>E</sup>Some of these job losses might be offset by increased opportunities in [processing](#) plants or related industries, but those new jobs are often located far away, so [workers](#) located near farms do not have access to them.

Many factory farms claim that by entering a community there will be an influx of jobs. In fact, most factory farm jobs pay such low wages that the work is a severe pay cut for local residents. Because of this, most must hire, or bring in, immigrant labor from Mexico and South America. <sup>E</sup>Labor conditions are often so horrible that on-the-job amputations are prevalent and health care is slim to non-existent. This atmosphere persists because immigrants unfamiliar with language, law and labor in the United States, are afraid to speak up or unionize. <sup>E</sup>

### Local Business

While many workers have lost jobs as a result of industrial farming, farmers are losing control over the way they farm and the prices they can ask for their products because of contract growing. Today, few poultry growers actually own the chickens they raise, and hog-growers are increasingly raising their herds for outside owners as well. <sup>E</sup>These farmers have no say over what breeds of animals they raise, and are often required to buy feed and other products from the same companies that own their animals. As corporate farms grow bigger and more centrally-controlled, small farms are unable to compete and eventually disappear.

Large, industrial farms moving in, and contract growing on smaller farms, also affect non-farm local businesses. A Michigan study demonstrated that small hog farms proportionately spend almost 50% more at local businesses than large farms do, primarily because larger farms buy [feed](#) in bulk from sources outside of the community. <sup>E</sup>Since factory farms are vertically-integrated, farm materials are bought within the corporation, rather than at the local feed or hardware store. In addition, industrial farms are often too large to be locally supplied, so they must buy feed and other materials in bulk from distant suppliers. For example, Wisconsin dairy farmers – who traditionally grew their own feed on the same land where they kept their cows – have increased herd sizes beyond sustainability and subsequently turned to importing feed because there isn't enough local acreage for both cows and crops. <sup>E</sup>

### Property Value & Tax Revenue

Despite the fact that industrial farms invest less in local economies than small farms, there is the claim that they increase property values and tax revenue. Class action lawsuits against factory farms in a number of states debunk this claim <sup>E</sup>and numerous studies have shown that property values are often negatively affected by large-scale livestock production, mostly due to undesirable and highly unpleasant odors coming from their facilities. An Iowa study showed that property values dropped approximately ten percent when large confined animal feeding operations were opened upwind of those properties. <sup>E</sup>One study of communities in Missouri demonstrated that houses located within one tenth of a mile of an industrial farm lost as much as 88 percent of their value. <sup>E</sup>

Evidence suggests that the effect of industrial agriculture on tax revenue is negative - many industrial farms receive large tax breaks, <sup>E</sup>abatements <sup>E</sup>and exemptions, <sup>E</sup>contributing little to local revenue. Though one Iowa study of hog farms suggested that local and state revenues increase when herd sizes grow toward 300 sows, they then decline as the herd size approaches 3,400. <sup>E</sup>Another report estimated that cattle feedlots have a large impact on local roads because of the constant transport of cattle in and out of the facility, and the funding required to maintain those roads offset any increased tax revenues that did come from the farm. <sup>E</sup>

### Community Health

Factory farms directly affect community health by introducing potentially hazardous substances into the air and water. [Air pollutants](#) such as hydrogen sulfide, ammonia, and particulate matter are released in significant quantities by large confined animal feeding operations, and all have the potential to negatively affect surrounding communities. <sup>E</sup>People living near hog farms, for example, often have increased respiratory problems, most likely due to the large quantities of ammonia emitted by these types of facilities. <sup>E</sup>One recent study indicates that children attending schools located near industrial farms may be at a higher risk for asthma. <sup>E</sup>

Large farms also often pollute local [water](#) sources, mainly through the release of nitrates and nitrites from chemical fertilizers. <sup>E</sup>A study of almost 2,000 wells across the country showed that 9 percent of domestic wells and 2 percent of public-supply wells had nitrate concentrations in excess of the EPA's maximum contaminant level. <sup>E</sup>Nitrate poisoning can cause dangerously low blood-oxygen levels in babies (or blue-baby syndrome), spontaneous abortions, and possibly cancer. <sup>E</sup>This is an especially serious problem in rural communities, because rural Americans are heavily reliant on groundwater and domestic wells. <sup>E</sup>

While many physical problems have been linked to factory farm runoff and air pollution, there is evidence that psychological and social problems can also result from living close to such facilities. <sup>E</sup>Studies suggest that symptoms such as fatigue, depression, and mood disturbances occur in higher proportions near confined animal feeding operations. <sup>E</sup>Several studies also suggest that the presence of industrial farms can cause an increase in disputes between neighbors and the loss of social status, mutual trust, social cohesiveness, and other measures of "social capital." <sup>E</sup> A study of one Oklahoma county from 1990 to 1997—a period in which large-scale hog farming was being introduced—indicated dramatic increases in violent crime, theft, and civil court cases. Counties which did not experience such changes in agricultural practices had decreases in all of those problems during the same period. <sup>E</sup>

### **"Industrial Farming and Your Health"**

The New York Times ran a front-page story in May 2003 about the health problems associated with industrial livestock farms. The following excerpt provides a few examples of the many health problems that industrial agriculture can cause:

"Paul Isbell of Houston, Miss., started experiencing seizures after a hog farm moved in down the road. Jeremiah Burns of Hubbardston, Mich., now carries a six-pound oxygen tank with him. Kevin Pearson of Meservey, Iowa, carried a towel in his car because he vomited five or six times a week on his way to work. Julie Jansen's six children suffered flu-like symptoms and diarrhea when farms moved into their neighborhood in Renville, Minn. One of Ms. Jansen's daughters was found... to have neurological damage. She has problems with balance and has lost some feeling in her fingers." <sup>E</sup>

### **Local Environment**

Industrial farms also take a toll on the environment in ways that affect the local community even when they don't pose an immediate threat to human health. For example, the particulate matter emitted from such farms contributes greatly to haze. <sup>E</sup>Foul odors—which are always a nuisance, but which may or may not be hazardous—are almost always emitted by large livestock operations. Ammonia emitted from farms can contribute to haze, loss in forest production, and a loss in biodiversity. <sup>E</sup>The nitric oxides produced in large quantities by farms, especially in manure application, <sup>E</sup>are among the leading sources of acid rain. <sup>E</sup>

Phosphorous and nitrogen pollution from fertilizers can cause fish kills, toxic algae blooms, and other significant changes in water systems. <sup>E</sup>Metals such as copper, zinc, lead, chromium, arsenic and cadmium are often added to animal feed, and when they are excreted through manure they often end up on fields as part of fertilizers. <sup>E</sup>They are all toxic to humans. Some of these metals, like copper <sup>E</sup>and cadmium, <sup>E</sup>can be directly absorbed by crops, and most of them can pollute drinking water as they either seep into groundwater or exit the fields along with other harmful pollutants via water runoff.

### **What You Can Do**

- The best way to keep factory farms out of communities is by purchasing foods directly from small farmers. You can use [Eat Well Guide](#) to locate sources of sustainable meat and dairy in your area, and visit farmers markets, farm stands, or join a CSA <sup>G</sup> group to keep small farms afloat and factory farms out.
- Another way to build community around food and sustainable farming is by hosting a sustainable community event. Once you've found your local farmer, get your friends and neighbors together to celebrate and support local farms!

### **Did You Know?**

- Odor alone – even if the individual chemicals that cause it are not hazardous – can cause adverse health effects in certain situations. <sup>E</sup>
- Fly infestations and light pollution are two of the many negative effects that industrial livestock facilities have on rural communities. These nuisances are not only damaging to quality of life of neighbors, but can also harm human health.

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## These Montanans Don't Want an Industrial Slaughterhouse in Their Backyard

In the small city of Great Falls, residents push back against a Big Ag plant that would consume 3.5 million gallons of water—and produce 102,995 pounds of waste—per day.

February 01, 2019 [Lora Shinn](#)

*Rion Sanders/Great Falls Tribune/USA Today Network*



*Stacy Hermiller was worried about her family's health and her property value when she found out a meat-slaughtering facility was being planned near her home east of Great Falls.*

Stacy Hermiller has deep roots in Big Sky Country. A fifth-generation Montana resident whose family has lived there since 1901, she fits the state's outdoorsy profile, actively enjoying fly-fishing, hiking, backpacking, and all manner of wilderness pursuits.

In 2008, when Hermiller bought a 20-acre piece of property about eight miles southeast of Great Falls, she had a picture-perfect idea of the rustic life she'd build there. That was before she received the certified letter in the mail.

The letter described a proposed slaughterhouse in the works for the property next door. Hermiller's neighbor across the highway didn't receive such a letter; the county only notified those whose property shared a fence line with the project.

Curious, Hermiller looked up the plant's plans, detailed on the county's website. There, she discovered that the Canadian company Friesen Foods wanted to construct Madison Food Park—which would become the largest meat-processing plant in Montana—in her community, known mostly for its small-scale agricultural businesses and Air Force

base and as a gateway to several state and national parks. Friesen would transform 3,000 acres (a tract about six times the size of Disneyland) into a “multi-species food-processing plant for cattle, pigs, and chickens and the further processing facilities for beef, pork, and poultry.”

Not only would the sheer size of the facility overwhelm Great Falls, a city of almost 60,000 residents, but it would also contribute a vast amount of pollution. For starters, it would produce more than [300 acres of treated industrial waste](#), to be disposed of in domestic waste lagoons. Across 260 days a year, its operators would process thousands of animals 24 hours a day in three eight-hour shifts, according to the [project’s application](#). Every day, dozens of trucks would transport animals to the facility and carry meat away, along the two-lane U.S. Highway 89. The parking lot would accommodate 1,900 vehicles.

“I was horrified. It was literally in my backyard,” Hermiller says. The region was zoned for agriculture and didn’t offer an adequate parcel of industrially zoned land. So the county planning board had voted to change allowable uses for the land under a special-use permit law. Hermiller notes that Cascade County advised its commissioners to vote the changes through—and that they ended up approving them unanimously. “The meeting was public, but it was not well advertised, so no members of the public were present to debate or offer comment,” she says. As a result, when they first saw the plans, Hermiller and her neighbor were “dumbfounded and helpless. We just couldn’t believe what we were looking at.”

A physician’s assistant at an orthopedic surgeon’s office, Hermiller hadn’t been active in local politics. But spurred by concerns about how an industrial slaughterhouse could impact the local environment and quality of life in Great Falls, she banded together with neighbors to learn more about the proposed food company and get organized, forming [Great Falls Area Concerned Citizens](#).

“Citizens are right to be wary,” says NRDC’s [Valerie Baron](#), an attorney focusing on sustainable agriculture and antibiotics as well as health and food. Though Friesen touted the promise of new local jobs, she notes, “Many slaughterhouse jobs are among the most dangerous. The risk of workplace injury is high, but there is also a significant risk from pathogens.” Studies show that workers in slaughterhouses and factory farms are [at risk from potentially deadly antibiotic-resistant bacteria](#), and Baron points out that workers can bring these bacteria home. Moreover, slaughterhouses can invite other environmental hazards, including an influx of heavy truck traffic, and can encourage other dangerous mega food-production facilities to move in.

Community meetings started with 60 or so residents in the fall of 2017. By the following spring, the Great Falls Area Concerned Citizens’ presentations, with guest speakers from the Socially Responsible Agriculture Project and elsewhere, were attracting up to 450 attendees, according to Hermiller.

## **Waters at Risk**

Residents are drawn to Great Falls for the area’s natural beauty. What’s more, homes are cheap and the air quality is good. The city even made a [Forbes “25 Best Places to Retire” list, in 2015](#).

Water in this part of north-central Montana is a defining feature. Residents can hike a trail that winds for 58 miles along the state’s longest river, the Missouri, which flows past Great Falls. Nearby are five waterfalls and one of the largest freshwater springs in the United States. [Giant Springs](#) (first recorded by Lewis and Clark in 1805) produces 156 million gallons of water per day, originating in an opening in the Madison aquifer in the nearby Little Belt Mountains. A wetland-rich wildlife refuge sits just north of Great Falls, and the Roe River, often called the “shortest river in the world,” flows between Giant Springs and the Missouri.

“The Missouri River is the heart of the Great Falls community and the surrounding area,” says [Zack Strong](#), an NRDC attorney and wildlife advocate who grew up there. “We used to fish, swim, wade, paddle, and splash around with the dogs in the river throughout the year. Building the proposed slaughterhouse would put the Missouri at risk and jeopardize the local economy, wildlife, recreation, and residents’ quality of life. Allowing the river to become polluted would be devastating.”

Madison Food Park—so named for the aquifer it would pull from—would also rely heavily on the region’s water, consuming a total of 3.5 million gallons of water per day via three or four deep-water wells. Great Falls residents know

this alone would spark conflict: Throughout Montana, agriculture interests and residents engage in “water wars” as they battle over access, notes Guy Alsentzer, executive director of the nonprofit Upper Missouri Waterkeeper. “There’s a saying in Montana: ‘Whiskey’s for drinking, and water’s for fighting,’ ” he says. Agriculture is also the single-largest source of nutrient and sediment pollution entering the waters of southwest and west-central Montana, [according to the group](#).

In the original proposal, Friesen Foods estimated that 102,995 pounds of animal waste would be generated by the operation per day. It also anticipated that “99.6% of the solid and liquid waste produced” would be either recycled using anaerobic digestion technology; repurposed into agricultural commodities; or rendered into pet food, fertilizer, or other protein meal. The company, coincidentally, had previously focused on producing animal feed.

Alsentzer notes that despite the promises, the proposal was disturbingly lacking in specifics about how any of that recycling, repurposing, or rendering would be accomplished. “The entire facility’s waste management is going to be a big threat to groundwater,” he says. The proposed site is at the headwaters of Antelope Creek, and the nearby Sand Coulee Creek flows into the Missouri River.

In Montana, surface waters (including runoff or spills) are connected to the groundwater through a porous soil, and as anywhere, the groundwater interacts closely with local waterways. “You put any pollution into local groundwater and it probably affects nearby streams and rivers,” says Alsentzer.

Most large-scale agricultural facilities take lagoon waste—a “nasty soup of strained blood and guts,” as Alsentzer describes it—and spray it onto the property’s soil and grass as fertilizer (and simply as a way to get rid of it). “It can have minimal impact for small-scale slaughterhouses,” Alsentzer says, but not at the industrial level. “Whether the waste is stored as solids or liquids in open lagoons, the scope of likely water pollution is boggling.”

The waste can contain some pretty bad stuff: for starters, nitrogen and phosphorus, which, should they leach into waterways, disrupt the food chain by creating oxygen-sucking algae blooms that kill off aquatic populations. There’s also *E. coli*, antibiotics, and antivirals. “There’s an overall cumulative threat,” Alsentzer says, especially given that the Missouri River is less than 10 miles, as the crow flies, from the proposed slaughterhouse. “If there’s a percolation into the groundwater from the lagoons, how will they even monitor for it, over dozens and dozens of acres?”

The record speaks for itself. Three-quarters of large U.S. meat-processing plants that discharge wastewater directly into streams and rivers violated their pollution-control permits in the past two years by discharging bacteria, pathogens, nutrients, and other materials, according to [a report from the Environmental Integrity Project](#) (EIP), based on U.S. Environmental Protection Agency records.

## **Wait and Watch**

[In May 2018, without any official statement regarding its reasoning, Madison Food Park announced it would amend its application](#) and requested more time to make the changes. “The widespread, vocal, consistent public opposition certainly played some role,” Alsentzer says.

There’s no deadline, so a new application could be submitted at any time. And Hermiller, who sold her property not long ago, suspects that Friesen will regroup and come back “bigger, stronger, and more effective.” But she doesn’t expect the community to back down from its fight against the Big Ag plant. “We don’t want to be complacent.”

“We have more cows than people in Montana,” Hermiller observes wryly. “I’m not against the slaughterhouse industry; I want responsible beef slaughterhouses. This is not responsible ranching, and it’s not what Montana was built on. We’re the ‘last best place on earth,’ ” she adds, stating Montana’s unofficial motto. “Let’s keep it that way.”

FOR OFFICE  
USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-20-20  
Complete:  Yes  No



## Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> 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@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov).

### Commenter Information

Name: Glenda S. Gauthier  
Complete Address: 14 11th St. North

### 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 disagree with making this area smaller.



# Public Comment Form

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## Commenter Information

Name: Tamara Lynne Smith

Complete Address: 397 Highwood Rd, 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

Please see attached letter

Tamara Lynne Smith

### For Office Use Only

Date Received: <u>2-19-19</u>	Date Reviewed: <u>2-20-20</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Cascade County Planning Board  
Public Hearing February 19, 2019, 9:00 am  
325 2<sup>nd</sup> Ave N  
Great Falls MT

My name is Tammie Lynne Smith. I am a Cascade County resident. We own property and reside at 397 Highwood Road.

I appreciate the opportunity to participate in this public hearing regarding the Draft Cascade County Zoning Regulations. I was hard pressed to complete a comprehensive review of the planning department information and extensive file of supporting documents related to the draft regulations. The documents were released just one week prior to this hearing and included over 3,000 pages of narrative, legal code, and analysis.

I oppose the current Draft Zoning Regulations and request the Planning Board and planning staff provide further information, clarification, and analysis to the following specific concerns.

I will provide a written copy of my comments.

#### **I. Zoning Maps do not include Legal Descriptions for the Boundaries of the Proposed New District.**

Section 14.1.1(3) requires a legal description for the boundaries of the proposed district.

##### **A. Have these been prepared for the new MU-20 or MU-40?**

The zoning maps that are included as Section 4 of the zoning ordinance are actually vicinity maps as described in section 14.1.1(2) of the zoning application process.

These maps are not the same as legal descriptions as required by the zoning ordinance and the MCA.

##### **B. When will such legal descriptions be available for public review?**

#### **II. Opposed to the Elimination of the Agricultural District**

The Cascade County Growth Policy clearly states the importance of agricultural farmland. Eliminating the Agricultural District is in direct conflict with the existing Growth Policy. By eliminating this district, there is no longer any mechanism in the zoning regulations that will protect the most productive soil types and preserve family farm units. I oppose eliminating the agricultural district.

Eliminating the Agricultural district contradicts many of the goals and policies from the Cascade County Growth Policy. (detailed below) Under the proposed regulations the definition of the MU-40 District would allow"

*"The MU-40 District is intended to provide for mixed land uses that may be more intensive in character and larger in scale while allowing residential sites characteristic of traditional farming and ranching uses."*

Large-scale uses are clearly not compatible with goals adopted to protect productive soil types and maintain farming units. A review of zoning ordinances around the state of Montana indicate that establishing Agriculture Zoning districts and prohibiting industrial/manufacturing uses from locating in the AG district is the standard planning practice to protect encroachment on agricultural land. I request all existing land that is zoned as "A-Agriculture District" remains in this district.

**A. There should be further analysis to determine where prime agriculture lands are located and how the proposed Mixed-Use districts will affect these lands.**

**B. I further propose that the zoning ordinance be amended to specifically protect prime agricultural soils in accordance with Section 8.6 of the Growth Policy.**

Contradictions to Cascade County Growth Policy:

Chapter 2: Goals and Policies

Goal 2: Protect and maintain Cascade County's rural character and the community's historic relationship with natural resource development.

Objectives:

- 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.

### Goal 3: Maintain Agricultural Economy

#### Objectives:

- A. Protect the most productive soil types.
- B. Continue to protect soils against erosion.

### Chapter 5: – Economic Conditions: Policies

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.
10. Aggressively develop, protect, and enhance the agricultural economy of Cascade County.
11. Encourage future development to locate on non-productive or marginally productive agricultural Land.

### Chapter 8: Policy and Goal Implementation

#### 8.2 Resource Protection Areas – Designation and Establishment

The following resource protection areas are hereby established as part of the Cascade County Growth Policy:

- Prime Agricultural Soils
- Forest Cover

#### 8.3 Prime Agricultural Soil Area

The prime agriculture soils resource preservation areas are intended to contain those soil areas where it is necessary and desirable, (because of their high quality, availability of water, and/or highly productive agricultural and grazing capability), to preserve, promote, maintain and enhance the use of such areas for agricultural purposes and to protect such land from encroachment by non-agricultural uses, structures or activities. Therefore, the prime agricultural soil preservation areas of Cascade County are those areas where the soils have been classified by the Natural Resources Conservation Service (NRCS), according to the NRCS definition of prime farmland or farmland of statewide importance.

#### 8.6 Subdivision Development Requirements

If a parcel larger than forty (40) acres is proposed to be subdivided and that parcel is determined to have twenty-five percent (25%) or more area coverage of either of the Resource Protection Areas (Prime Agricultural Soils or Forest Cover Areas), then subdivision approval shall only be granted by the Board of Cascade County Commissioners when it makes findings that the subdivision will not significantly reduce the defined Resource Protection Area's functions, or if all of the following criterion are complied with:

- The applicant can realize a reasonable return on the fair market value of his land only by devoting the resource protection areas to uses that will significantly reduce their defined area functions.
- The applicant has no other land reasonably suited for the subdivision.
- The subdivision has been designed to minimize the reduction of the Resource Protection Area's functions.
- The subdivision must not significantly interfere with or jeopardize the continuation of agriculture or forestry on adjoining lands or significantly reduce their functions.

### **III. Clarification of Section 18 Unclassified Use Permits**

Section 18 states the following:

*"Unclassified uses are hereby said to possess characteristics of such unique and special forms that each use shall be considered as an individual case regardless of their underlying zone district."*

The list of uses that are included in this section can be allowed in any zoning district if they go through the process outlined in the section. All of these uses are already listed as either permitted uses or special uses in other zoning districts in the regulations.

#### **A. What is the rationale for allowing such uses in any district, even districts that are not suitable for such uses?**

For example, according to this section a slaughterhouse, feedlot, and coal plant would all be able to apply for a permit in any residential district. It is my opinion that this section is unnecessary and should be deleted.

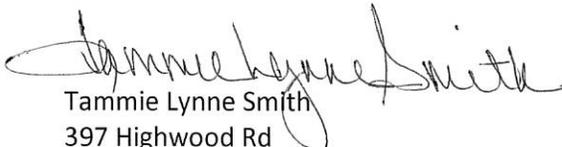
#### **IV. Revise Definitions of the Zoning Districts to Reflect the Cascade County Growth Policy**

It is not clear how the various definitions of the zoning districts relate to the Growth Policy. Zoning district definitions should demonstrate that such regulations are made in "accordance with the growth policy". When there is a conflict between the zoning district definition and the Growth Policy, this results in inconsistent land use decisions and places local governments zoning actions at risk of being overturned if challenged in court.

There is no analysis in the staff report indicating how the definitions were derived or how the definitions for mixed-use districts, MU-20 and MU-40, are linked to the growth policy. The only reference in the Growth Policy to mix-use development is in reference to developing safe, sanitary and affordable housing. (Goal 12, Objective H)

**A. I propose that the zoning district definitions reference specific goals, objectives and policies from the Cascade County Growth Policy that are the basis of these definitions.**

Thank you for your time and consideration of my concerns. I look forward to additional time to complete further research and detailed evaluation for the March hearing.



Tammie Lynne Smith  
397 Highwood Rd  
Great Falls MT 59405



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Date Received: 2-19-19

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Complete:  Yes  No



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Phone: 406-454-6905 Fax: 406-454-6919

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### Commenter Information

Name: MARKO FANGSRUD

Complete Address: 2923 3<sup>RD</sup> AVE. N. GREAT FALLS

### 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

PLEASE CHANGE ZONING TO MAKE IT EASIER FOR THE PROVIDER & PATIENT TO GET THE HELP WE NEED.

Date Received: 2-19-19

Date Reviewed: 2-20-19

Complete:  Yes  No



## Public Comment Form

Cascade County Public Works Department Planning Division

121 4<sup>th</sup> St N, Suite 2H-21

Great Falls, MT 59401

Phone: 406-454-6905

Fax: 406-454-6919

### Instructions

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### Commenter Information

Name: JOSH TRAMER

Complete Address: BLACK RACON

### 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

WE NEED TO OPEN ZONING <sup>BOUNDARIES</sup> FOR POTENTIAL DISPENSARIES  
OR CANNABIS GROWS TO CROSS THE GRAD FOR  
FOLKS THAT ARE IN NEED OF A NATURAL  
(NON-ARM) SOLUTION TO PAIN, PTSD, ETC. RELIEF.



FOR OFFICE USE ONLY

Date Received: 2-19-19

Date Reviewed: 2-20-19

Complete:  Yes  No



# 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

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## Commenter Information

Name: Dann T. Dooley

Complete Address: 1301 1st Ave N

## 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 think it should be allowed in  
small industrial! why are we  
restricting access? Keep Great Falls money  
in Great Falls! Buy local  
Please  
Dann



# Public Comment Form

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

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## Committer Information

Name: Logan & Kallie Tinsen

Complete Address: 19 Stone Mill Lane 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): review of public information

## Comment

please see attached

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For Office Use Only			
Date Received: <u>2-17-19</u>	Date Reviewed: <u>2-20-19</u>	Complete:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Dear Planning Board Members;

First, thank you for serving as planning board members on a volunteer basis. It is hard work and we appreciate it.

It is with tremendous trepidation I write this comment to you today. My concerns lie with the substantial zoning changes being proposed for Cascade County, with over 2000 sq. miles being proposed for changes. I as a landowner, along with many others, have been trying to work with county planning staff since November 2018 to help correct zoning inconsistencies. This has been met with great resistance. Many landowners have tried to request public information as to how these substantial zoning changes have come about. This again has been met with great resistance being referred to the county attorney before being allowed to review these public documents. It was not until after many citizens requested these documents that the county published them for all to see. Over 3,700 pages were posted on 2/12/19, how can a citizen or anyone for that matter, review this many documents to make an informed public comment to the board?

I, myself, have spent over 40 hours reviewing the proposed changes to make informed comments to you today. The **deletion** of the agricultural (A) district and reclassification to Mixed Use-20 and Mixed Use-40 is the most significant change. Reclassification of permitted uses and permitted uses by special use permits are the second most concerning change.

If you look at **appendix A** (in your packets):

**Section 2 Definitions:**

There are **40 changes** in this section. Twenty-five added or revised Ag definitions. Ag use definition previously excluded feedlots, it no longer does. The slaughterhouse definition now allows “temporary stabling” of animals. How long is temporary?

**Section 3:**

Agricultural (A) district removed in its entirety. Mixed use (MU) is revised to add mixed use-20 (MU20) and mixed use-40 (MU40). MU-20 is to “serve as a buffer” between MU-40 districts? If so, there is no MU-20 zoned land on highway 87 east to Belt or North to Havre. Why are these highways no considered “major transportation corridors”? Also of note, expansion of MU-20 designated parcels well beyond the “transportation route” to Sun River, Fort Shaw, Vaughn, Cascade areas.

MU-40 allows commercial feedlots (CAFO) and slaughterhouse with special use permit. It provides **ONLY** a one-mile restriction to “adjacent” residents at time of application. What is “adjacent”? Would “nearest” be better defined? MU-40 would also allow “temporary” and “permanent workforce housing” at what density and no definition of “temporary” is provided.

If Cascade County adopts these new zoning districts, the change to land use designation will affect millions of acres and thousands of land owners.

#### Section 4:

Maps are changed to reflect the deletion of agricultural (A) district and addition of MU-20 and MU-40.

**Appendix B** in your packets;

- “With the Agricultural district divided between the MU-20 and MU-40 geographies **there is less of a need for the use of the SUP process** since there are fewer potentially impacted residences and those around are likely to be involved in a productive land use.” “Additionally, this protects productive land use areas from types of development driven by demand for amenity destinations which have infringed upon ranching and farming areas throughout the county and the state.” If I understand these statements correctly, there is no need for a special use permit (SUP) in MU-40 districts due to MU-20 “buffer”. If this is true, why is there not MU-20 zoned land on highway 87 East to Belt? Is this land not developing similar to land on I-15 South to Cascade?
- Growth Policy
  - o By satisfying Goal 1, Objective A there is the possibility to violate Goal 9 of the growth policy. By allowing new business’s to come in that are improperly zoned we put our farmland of statewide importance in grave danger.

#### Section 7:

There are **significant** changes in permitted and permitted through special use permit uses in mixed use and industrial districts.

- Many of the newly defined agricultural related uses have been allowed across multiple districts. There are no guidelines concerning size and scope that cross multiple zoning districts. This has the potential to alleviate a developers’ need to seek re-zoning and can call into question the intended purpose of distinctly separate zoning districts.
- Two of the redefined definitions have been allowed in the “**Unclassified Use Permit**”
  - o CAFO
  - o Slaughterhouse

#### Section 18 Unclassified Use Permit:

Unclassified uses are hereby said to possess characteristics of such unique and special forms that each use shall be considered as an individual case **regardless of their underlying zone district.**

- If I understand correctly, a developed could avoid applying for a zone change by applying for this permit.
- This would keep the applicant for appearing before the county commission. The unclassified permit would be for ZBOA only. I feel these are too big of decisions to be made by appointed volunteers. Maybe only elected officials should have the power to approve such things.

In summary, this has been a limited review by one citizen that took 40+ hours to become as informed as possible before submitting public comment. I implore you to allow substantially more time for the citizens of Cascade County to review 3,700+ pages of material to become more informed. Having only one week to review makes it an impossible feat to be fully informed and prepared. The public hearing needs to be changed so more involved citizens can attend. Having a public hearing at 0900 on a weekday does not allow for sufficient public comment as a majority of citizens are working. I would ask future meetings are held in the evening to allow for maximum public participation.

Thank you for your time and consideration to my concerns of the county I was born, raised and continue to love and support.

Best Wishes,



Pharm.D.

Logan Tinsen, Pharm.D.

FOR OFFICE USE ONLY

Date Received: 2-19-19

Date Reviewed: 2-20-19

Complete:  Yes  No



# 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

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## Commenter Information

Name: Cynthia Outten

Complete Address: 600 17Ave.S.#28 Gt.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): Zoning Ordinances Against Medical Marijuana Industry.

## Comment

I am a Medical Marijuana User with a Valid Medical Marijuana Card. I disagree completely with the New Zoning ordinance against medical marijuana. The new Zoning Ordinance will create a tremendous hardship for me to be able to get my prescribed medication. I do not drive, due to my medical condition and must find a ride every time I need a refill or have my medication delivered to my home. All of my other medications are either picked up within the city limits or delivered to my home. My pharmacy is licensed & follows all laws and is NOT being forced to relocate OR not being allowed to deliver to me. My dispensary for my LEGAL medical marijuana is licensed and also following all laws! IF made to move and not deliver, I will NOT be able to get my prescribed medication. This puts a limit on my access and freedom of choice for my healthcare provider. I try VERY hard to buy EVERYTHING LOCAL. I am on a VERY limited income and this will also raise the costs of my medication.

I will be forced to buy out of  
my area which will also hurt the  
Local Economy. I truly thought  
Cascade County had the Best  
Interests of the people And LOCAL  
Business at heart. Please  
Reconsider your Zoning and Keep  
our jobs local AND our Access  
to healthcare Local.

Thank-you

I truly feel we are being  
singled out because of the  
Type of medication we use.  
This is Discrimination and  
Not Right.

Date received: 2/19/2019  
Date reviewed: 2/19/2019

Complete: Yes



## Public Comment Form

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Phone: 406-454-6905

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### Commenter Information

Name:

James Vennes

James Vennes  
2-18-19

Complete Address:

1820 15<sup>th</sup> St. 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): \_\_\_\_\_

### Comment

I have lived and paid taxes in Cascade County for 29 years. I use medical marijuana as allowed by state law. The proposal by Cascade County Commissions to limit medical marijuana providers to heavy industrial sites 1000 ft away from residences where youth might gather amounts to prohibition. There are few available, affordable sites. Without a provider, I have no source. Secondly, this proposal is anti-business as my provider pays taxes and complies with the law. Please reconsider this plan. James Vennes

Date received: 2/19/2019  
Date reviewed: 2/19/2019

Complete: yes



## Public Comment Form

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Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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### Commenter Information

Name: Patricia A. Vennes

Complete Address: 1820 15<sup>th</sup> Street S., 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

My husband is a medical marijuana user. Over the years, he has often been unable to procure the cannabis that eases his pain. Previous to using cannabis, his doctors prescribed numerous drugs that caused him additional problems medically, even to the point of his considering suicide.

Now, using only medical marijuana, he is able to manage his pain and have a more positive outlook on living.

The zoning proposal now under consideration that requires any county grow operation to be limited to heavy industrial sites causes a hardship to providers who legally grow cannabis for their patients. There are a limited number of available, affordable sites that can be used for grow operations. Therefore, this proposed zoning requirement will have the effect of limiting availability of medical marijuana for the people who do have green cards but are unable to find a provider.

Patricia A. Vennes



# Public Comment Form

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Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: Robbie Regennitter

Complete Address: 620 Stockett RD, Sand Coulle, MT 59472

## 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 have concerns regarding anything related to Medical Marijuana and it being isolated to Heavy Industrial Zoned areas. Cascade County is a large county and you are limiting it to one small area of the entire county. I didn't see any Heavy Industrial areas in Simms, Fort Shaw, Belt, Monarch, Neihart, Stockett, Cascade or anyother outlying areas of the county. I also seen that you issued a special use permit for a hemp processing facility to extract CBD from the plant. This is the exact same process used to extract THC from cannabis. Will special use permits be issued for Medical Marijuana providers, or will they be discriminated against? I don't see any provisions for exceptions to be made. Can this be corrected?

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For Office Use Only			
Date Received:	<u>2-17-19</u>	Date Reviewed:	<u>2-20-19</u>
Complete:		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No



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## Commenter Information

Name: Robbie Regennitter

Complete Address: 620 Stockett RD, Sand Coulle, MT 59472

## 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 have a couple of concerns regarding 7.7 Mixed Used 40 zoning regulations. The first is 7.7.11 USES PERMITTED UPON ISSUANCE OF A SPECIAL USE PERMIT (4) Commercial Feedlot or Concentrated Animal Feeding Operation CAFOs are a high polluting, fowl smelling operation, that does not belong in MU-40 zoned areas. They belong in Heavy Industrial zoned areas. The second item is 7.7.11 USES PERMITTED UPON ISSUANCE OF A SPECIAL USE PERMIT (27) Slaughterhouse. The same reasoning works for these operations. They also belong in Heavy Industrial zoned areas. To understand why, all anyone has to do is to visit a couple of CAFOs or visit a Slaughterhouse town and see the distruction they cause. Smell travels more than 1 mile. Pulluted aquifiers are damaged beyond repair. If tne members writing the regulations would visit these areas, they probably would outlaw them from our entire county. I don't want to be the one who has to tell my grandchildren that my generation didn't care about their health and quality of life. We do not need to sale our legacy to a foreign company.

\_\_\_\_\_

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\_\_\_\_\_

For Office Use Only			
Date Received:	<u>2-17-19</u>	Date Reviewed:	<u>2-20-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

**Hopkins, Sandor R.**

---

**From:** Cindy <unkball@gmail.com>  
**Sent:** Sunday, February 17, 2019 3:23 PM  
**To:** Planning Comments

Dear Planning Committee,

I am writing to let you know that I am against the proposed zone permit change from agricultural to Mixed Use. I am unable to attend this meeting as it is on a work day and I am an elementary school teacher. We haven't had enough subs to cover with all of the illnesses going around right now. I would definitely attend an evening or weekend meeting and would like more information about why this change is being proposed. I am completely against the large scale industrial farming and slaughterhouse industry. My husband and I both come from local cattle ranching families and we are all opposed to this. We are obviously not opposed to animal husbandry and humane slaughtering practices, but we are 100% against against large scale industrial parks. We support Montana industries and local business, but this is in no way beneficial to our community or good for our environment. I hope you take the time to listen to the people that actually live here. I also can't imagine the changes this would bring to our school population and community resources, which are already underfunded.

My husband's family ranch address is 1513 Stockett rd (owned by Tom and Pam Kohut), my family's ranch is at 1059 e Eden Rd (owned by Carol Konesky Schroer), and my husband and I live at 915 33rd Ave S. Great Falls, MT 59405 where we own a home on .71 acres. All of us and many more friends and relatives (people from the local ranching community) are opposed to this change. I also am shocked by the total lack of information that is being put out about this "project." I continue to meet people who have never even heard of the MFP and I find this shocking. It sure would be nice if adequate information were put out for the community and community members were allowed to vote on this! Thank you for your time and consideration.

Sincerely,  
Cindy Schroer Kohut and family (Brad, Noah, and Sam)

FOR OFFICE  
USE ONLY

Date Received: 2-17-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No



# Public Comment Form

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

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## Commenter Information

Name: Michael Enk

Complete Address: Mailing: PO Box 1408, Great Falls, MT 59403 Residence: 6432 43rd St SW

## 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

## Comment

I am strongly opposed to changing Agricultural zoned land to Mixed Uses, thereby allowing many more kinds of uses and development which would threaten the open space and rural characteristics of these lands with industrial-type activities. I am especially opposed to allowing commercial feedlots, concentrated animal feeding operations, and slaughterhouses on land currently zoned as Agricultural. Zoning changes should be made on a case-by-case basis after full public review and environmental analysis of proposed development. Allowing such a broad array of non-compatible uses on land currently zoned as Agricultural undermines the purpose of thoughtful planning and guided development that best serves the surrounding community. Additionally, the relaxation to allow Unclassified Uses such as Slaughterhouses and Concentrated Animal Feeding Operations regardless of the underlying zone district is unacceptable.

This proposal by the Planning Board is a grave disservice to the citizens of Cascade County who wish to protect their clean water, clean air, viewsheds, and agricultural landscapes. It would render previous zoning efforts meaningless and eliminate the sideboards for compatible growth across the county.

The proposed zoning changes are complex and comprehensive. A February 19th public hearing does not allow sufficient time for the public to review the changes in order to prepare questions for the hearing. I request this hearing be postponed until adequate disclosures have been made and time allowed for proper development of questions and alternatives by the public. Likewise, a March hearing for public comment would also be premature and an impediment to meaningful public participation. Furthermore, all public meetings should be scheduled after 5:00 pm to allow working citizens (whose taxes pay the salaries of county officials) to attend.

### For Office Use Only

Date Received:	<u>2-18-19</u>	Date Reviewed:	<u>2-20-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: Renae Munson

Complete Address: 3000 8th Ave North / Great Falls, MT 59401

## 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 Regulation "Revisions"

## Comment

I OPPOSE the revisions to zoning regulations. Great Falls has been home to my family for six (6) generations for over 120 years. I have never considered living anywhere else. There are others in my family that have moved away that are wanting to move back to Great Falls because of our beautiful friendly town, clean water and air, and somewhat reasonable traffic. The revisions to the zoning regulations makes it easier for the MASSIVE slaughterhouse to be built...one of the LARGEST in the country. This WILL DESTROY our town. It will overburden our healthcare, our schools, our roadways, our prisons/jails and police.

200 feces spewing semis a week transporting 57K swine, 10K cattle on our roadways. You can't get from one end of town to the other without driving THROUGH town. That feces will be spread everywhere after getting on tires, drying blowing in the wind. It will diminish our river's edge trail (the truck route); it will drain our beautiful giant springs.

During the fall, the seasonal transportation of livestock through town is VERY noticable. The smell is dreadful and the additional traffic is horrible too, but that's only a couple weeks of the year. Having that every day would impact ALL of our quality of life for the worse. Then add the expected 12K "New Residents" every 3-4 years and the impact that will have on traffic. 10th Ave South is already one of the busiest streets in the state. There is NO benefit to Great Falls to allow one of the biggest massive slaughterhouses in the country to be buildt here. This is a critical junction that will forever destroy Great Falls. A town that neighbors help each out, where folks are friendly at the store, the people here...love Great Falls as it is....so much that lots of miliary from MAFB usually retire here. All the reasons that people have to make Great Falls home will be destroyed to the revisions to regulations that are shielding us from a MASSIVE industrialized slaughterhouse. No one wants it.

### For Office Use Only

Date Received: <u>2-18-19</u>	Date Reviewed: <u>2-20-19</u>	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 4<sup>th</sup> 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](mailto:planningcomments@casadecountymt.gov).

## Commenter Information

Name: Jennifer Hicks

Complete Address: 2923 3rd Ave No, Great Falls, MT

## 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 would like to address the zoning changes occurring in Cascade county that will provide for and allow a massive slaughter house on land immedietly East to Great Falls. I feel our county commissioners have been extremely guilable and have not sufficiently researched the impact of such facility on our watershed, air quality, or infrastructure. Healthy economic growth cannot be based on promises by foriegn corporate promises that historically mean nothing. This facility will do nothing to support regional family farming and stands to follow industrial practices that have caused significant health problems for those that live around them. The evidence speaks for itself, as I am sure others will present. I am a lifelong asthmatic, been a productive citizen of this city, and looked forward to retiring here. I will be one of the people who will be forced to relocate if this comes to fruition and ruins our air quality. Who is going to pay for that relocation? Will I need to take legal action at the county or the state level? Who will take these low paying jobs that are increasingly becoming automated and will disappear? If our commissioners want to support the rich agricultural heritage of our Golden Triangle, the right move would be to focus on the needs of our family farms and ranches and not on the desires of multi-national organizations or groups that exploit us and our treasured resources. I ask that you remove the proposes zoning changes and remove the possibilty of a massively polluting factory and the harm it will bring.

### For Office Use Only

Date Received: <u>2-20-19</u>	Date Reviewed: <u>2-20-19</u>	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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
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## Commenter Information

Name: LaLonnie Ward

Complete Address: 70 McKinior 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): Proposed changes to Cascade County Zoning Regulations

## Comment

Thank you for reviewing written comment from those of us who are unable to attend the public hearing on February 19, 2019 regarding the proposed changes to the Cascade County Zoning Regulations.

As I have attempted to fully review the proposed changes, I am first overwhelmed by the sheer magnitude at the number of changes, and second, at the vastness of those changes. It is a considerable amount of information to digest in the short amount of time given to review the proposals. In that light, I will limit my input to the proposed change, that potentially will most directly, affect my family and me.

As 3rd generation farm owners, who reside east of Great Falls, we are greatly concerned with the proposed elimination of the "A" - Agricultural District, and reclassification of affected agricultural lands into MU-40. The majority of counties in Montana, including Cascade County as evidenced in it's growth plan, recognize the importance of agriculture, and the necessity to protect rural farms and ranches, from urban and industrial intrusion. Placing agricultural lands in MU-40 would effectively remove that protection.

Therefore, to ensure the preservation of the character of Cascade County's family farm and ranch community, we kindly request that the current "A" - Agricultural District be maintained and all properties currently zoned "A" remain in said District.

Your consideration of this matter is greatly appreciated.

### For Office Use Only

Date Received: <u>2-16-19</u>	Date Reviewed: <u>2-20-19</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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## Hopkins, Sandor R.

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**From:** KRIS OLEYAR <que86@msn.com>  
**Sent:** Tuesday, February 19, 2019 5:20 PM  
**To:** Planning Comments  
**Subject:** zoning change

I feel rezoning for CAFO/slaughterhouse will be a bad mistake for the area. This will destroy Great Falls, threatening our water, increasing crime, driving away people from our community. I don't feel letting MFP using our area as their toilet/dumping ground will benefit our community.



Date Received: 2-19-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No

FOR OFFICE USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-20-20  
Complete:  Yes  No



# Public Comment Form

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

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## Commenter Information

Name: Melissa M. Price  
Complete Address: 1625 6th Ave. NW Grt. Falls, MT 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

I need to have access to my medicine this is too restricting. Please give them less restrictions and allow there to be providers.

FOR OFFICE  
USE ONLY

Date Received: 2-19-19

Date Reviewed: 2-20-19

Complete:  Yes  No



## Public Comment Form

Cascade County Public Works Department Planning Division

121 4<sup>th</sup> St N, Suite 2H-2I

Great Falls, MT 59401

Phone: 406-454-6905

Fax: 406-454-6919

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### Commenter Information

Name: Tiffany Kuglin

Complete Address: 103 42nd St S. Great Falls, MT 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

I believe that the city ordinances should be lifted for medical marijuana. It not only brings jobs but has a huge potential to help our opioid epidemic. The fact that you are willing to keep it out but allow a pain clinic is just crazy. Its like our city is saying they are ok with slowly killing people. You should be more willing to end that with something that is not so addictive and doesnt shut down your system. in the long run. Its not all about smoking I would like to suggest our city officials do alot more research.





FOR OFFICE  
USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No



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### Commenter Information

Name: Daniel Brian  
Complete Address: 1535 3rd Ave SW

### 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

equality throughout the state for every patient.  
Sick people in need. Been try to come to market  
for over 5 years.

FOR OFFICE  
USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-10-19  
Complete:  Yes  No



## Public Comment Form

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

### Instructions

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### Commenter Information

Name: Solomon Wise  
Complete Address: 1600 9<sup>th</sup> Ave S 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

Id like to see better access to medical marijuana  
within city limits and the county

FOR OFFICE USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No



# Public Comment Form

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

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## Commenter Information

Name: Tatjana Müller  
Complete Address: 2101 1st Ave N.

## 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 feel like medical marijuana dispensaries should NOT be limited to out of town. Each patient should have access to their medication. Out of town dispensaries do nothing for the patient it also makes the most disabled and impoverished patients unable to access medication. ~~It~~ effectively "classing" medical marijuana to those w/ accessible transportation.

FOR OFFICE  
USE ONLY

Date Received: 2-19-14

Date Reviewed: 2-10-14

Complete:  Yes  No



## Public Comment Form

Cascade County Public Works Department Planning Division

121 4<sup>th</sup> St N, Suite 2H-2I

Great Falls, MT 59401

Phone: 406-454-6905

Fax: 406-454-6919

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### Commenter Information

Name: Jennifer Hicks

Complete Address: 2923 3<sup>rd</sup> Ave No

### 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

Clean agriculture!  
Not polluting our air or  
water.  
Freedom of access as per  
majority of voters in  
the state.

FOR OFFICE USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-20-20  
Complete:  Yes  No



# Public Comment Form

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121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: Tara L. Hollaway  
Complete Address: 914 20<sup>th</sup> Ave S. Great falls 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 need access to medicine.  
With the opioid crisis this is my only option.  
I have no transportation and need city bus service  
to get it.  
If my provider needs to move his grow then  
he will be out business and I will be in so much pain  
I will be suicidal.

Date Received: 2-19-19Date Reviewed: 2-20-19Complete:  Yes  No

## Public Comment Form

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### Commenter Information

Name: Tosia Knight HolmesComplete Address: 816 6<sup>th</sup> Ave NW Great Falls MT 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

I Strongly disagree with the Cascade County, the proposed zoning ordinances against the medical marijuana industry. These new ordinances will create an undo hardship on patients & providers. It will make it harder to get medicine to the patient, possibly eliminate patients from getting the medicine. It will also, take the freedom of choice away from the patients as they may have to settle for a provider we will also be pushing the small providers out, no more local providers. In other words we will be sending away that money. Great Falls local business will not see that money. Other Montana towns & cities will. There will also be no local job growth in Great Falls from the MMP.

FOR OFFICE  
USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-20-20  
Complete:  Yes  No



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### Commenter Information

Name: Dana Mitchell  
Complete Address: 432 26<sup>th</sup> AVE NE GF MT 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

Under the proposed zoning regulations it will cause undue hardships on patients. They should have a right to receive their medication without having to travel, especially since some of them have limited physical abilities. Also, they do not have the option to have someone else travel for them or pick up their medication within the limitations of the current medical marijuana laws.

FOR OFFICE  
USE ONLY

Date Received: 2-19-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No



## Public Comment Form

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

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### Commenter Information

Name: Rose Wethern  
Complete Address: 5323 66<sup>th</sup> Ave SW GF MT 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

I strongly disagree with the cascade county new zoning ordinances against the medical marijuana industry - with these new ordinances it will make it harder to access medicine for patients - will eliminate local providers & freedom of choice - and increase cost. This will create undue stress & hardship for patients, if a person has to travel out of the county to obtain their medicine - not to mention now forcing people to travel with marijuana. Our city commission should be finding ways to capitalize on this booming new industry instead of trying to quash it. There are many other states that have amazing income from medical & legal marijuana. -



# Public Comment Form

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Great Falls, MT 59401  
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## Commenter Information

Name: Mary Beth Ewen  
Complete Address: PO Box 2672 Great Falls, MT 59403

## 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

As a landowner (farm & Ranch) in Cascade County I (we)  
are concerned about the lack of information about zoning  
changes that affect agricultural land in Cascade County.  
Many rumors make it difficult to know what is going on!  
It would seem to me that all landowners in the County  
should be made aware of changes and reasons for the change.

Since this is a busy time for farmers & ranchers, a March  
meeting in the late afternoon or evening would be beneficial.  
This would give the County residents both rural & urban the time  
review the changes

I also think more public notification needs to be  
made so there is knowledge of when & where the  
meeting will be held.

For Office Use Only			
Date Received:	<u>2-19-19</u>	Date Reviewed:	<u>2-20-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	



# Public Comment Form

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## Commenter Information

Name: M. BURTON  
Complete Address: 3805 - 7<sup>th</sup> St. N.E. G.F.

## 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

Most of the people that use med. don't have cars to pick it up. So, if you take it out of town, they can't get it.  
M. Burton  
2/1/19

### For Office Use Only

Date Received: <u>2-19-19</u>	Date Reviewed: <u>2-20-19</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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## Hopkins, Sandor R.

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**From:** Claire Baiz <clairebaiz@gmail.com>  
**Sent:** Saturday, February 16, 2019 1:17 PM  
**To:** Planning Comments  
**Subject:** ZONING PLAN COMMENT & FORM  
**Attachments:** Public Comment Cascade County Zoning Form Baiz 2 19.jpg; CASCADE COUNTY ZONING CHANGE COMMENT 2 19.pages

16 February 2019

Cascade County Public Works Planning Division  
121 Fourth Street North, Suite 2H-2I  
Great Falls, Montana 59401

Dear ZBOA:

Awhile back, weeks after pivotal zoning changes were quietly implemented in Cascade County, a Special Use Permit (SUP) was filed — under the newly approved (and controversial) provision.

Now, neighbors, citizens, farmers, and other interested parties are faced with over 200 pages of proposed “tracked changes” for Cascade County’s 181 pages of zoning regulations. What are the motivations behind this sweeping rewrite? Why now, when many of us are preoccupied with the Montana legislature? Why now, when rumblings of a re-filing of a divisive SUP are smoldering on social media?

Transparency, patience, fairness, and an abundance of caution are vital.

Proposed changes in zoning language conflict with [Cascade County’s 81-page Growth Plan](http://www.cascadecountymt.gov/df/361/Adopted2014_GrowthPolicy.pdf) ([http://www.cascadecountymt.gov/df/361/Adopted2014\\_GrowthPolicy.pdf](http://www.cascadecountymt.gov/df/361/Adopted2014_GrowthPolicy.pdf)): if these regulations go into effect, agriculture would become another “Mixed Use” of rural land.

Cascade County’s Growth Policy emphasizes that we “[must encourage the growth of the agricultural economy.](#)” How does eliminating genuine “agriculture” as a distinct zoning category further that goal?

Changing “Agricultural” zoning to “Mixed Use” does not “[protect and maintain Cascade County’s rural character and the community’s historic relationship with natural resource development.](#)”

This change in wording does not “[foster the continuance of agriculture and forestry in recognition of their economic contribution and the intrinsic natural beauty of grazing areas, farmlands and forests](#)”?

How can Cascade County’s Growth Policy “[assure clean air, clean water, a healthful environment and good community appearance,](#)” when the preservation of our agricultural heritage is not a priority in zoning definitions and regulations?

Changes in the current zoning structure would not “[maintain the agricultural economy.](#)” Nor would they “[preserve and enhance the rural, friendly and independent lifestyle currently enjoyed by Cascade County’s citizens.](#)”

Words matter —as does their source. Please publish, on Cascade County’s website, all supporting documents, input from developers, etc., drafts from other counties, etc., that might have informed or influenced these proposed changes in zoning policy.

These changes are unexplained, opaque, and ill-timed.



Date Received: \_\_\_\_\_

Date Reviewed: \_\_\_\_\_

Complete:  Yes  No

Replacing "Agricultural" zones with "Mixed Use" chips away at the foundation of our economy, heritage and identity. The passage of these zoning changes would undercut Cascade County's potential leadership role in sustainable agriculture.

Respectfully,

Claire Reichert Baiz

Claire Reichert Baiz

GFHS Class of 1975, UGF Class of 1979 & Proud Great Falls Gal in Midwestern Exile

117 W Grove Street, Apt. 204

Mishawaka IN 46545

**Hopkins, Sandor R.**

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**From:** Patricia Rosenleaf <prosenleaf1@gmail.com>  
**Sent:** Sunday, February 17, 2019 4:47 PM  
**To:** Planning Comments  
**Subject:** proposed changes

Dear Members of the Committee:

It seems to me that what you are trying to do is to carve out some land for this proposed slaughterhouse, which in no way represents anything but industrialized farming, a terrible and catastrophic misuse of not only our water but everyone dependent upon the Madison aquifer, an attempt to drum up some kind of employment though it be of the lowest, most demeaning, soul-stealing sort coupled with an inability on these members' parts to foresee the damage that said "food park" would do to this community. Who will pay for the schools, the housing, the unemployment (with the huge turnover in this history of these kind of enterprise), the disease, the fouled air, the infant mortality, etc? At the very least, we citizens should have a vote in this most ill-advised venture. How can you even consider, much less plot, to have this company move into our town when you know the overwhelming sentiment is against the idea? Do you not represent us? Do you really feel that you have the right to foist this on us without our input? Please reconsider this idea. When our neighbor to the north has laws against such "industrial parks," but you consider that their fears have no merit in this country, I can only shake my head in wonderment at such leadership. Please take into consideration the enormous damage that will be done by this plan and re-think what your proposal is doing.

FOR OFFICE  
USE ONLY

Date Received: 2-17-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> 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: RICHARD D. & KAREN S. PEPOS  
Complete Address: 7 Hidden Valley Rd, Sand Coulee, MT. 59472

## 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

My husband and I reside on a 20 acre parcel of land located at 7 Hidden Valley Rd, Sand Coulee, Montana. We purchased the land in 1992 and finished our home in 1993. We live approximately one mile south of US Hwy 89 on Hastings Road.

We are writing to you in opposition of the proposed processing plant called the "Madison Food Park, LLC. The proposed location of the plant is approximately 8.3 miles southeast of Great Falls and 1 mile east of our residence and acreage.

My husband and I saved a long time to purchase our property and finally be able to move our 3 sons out of Great Falls and in to the country. We wanted room for them to run, away from traffic, noise and close neighbors. We wanted them to experience viewing wildlife, breathe clean air, attend a Class C school and get away from City buses going up and down our street all day and any proposed industrial projects.

Now you intend to rezone nearby agricultural land which is technically "in our back yard" and build a processing that will drain our wells, pollute our fresh air, create noise and increase the traffic in our residential area!

The amount of water they intend to use is over 3 million gallons per day. Where is all this water and other waste going to go? All the waste water will flow to Box Elder Creek and the Missouri River causing massive pollution and our wells will probably go dry!

### For Office Use Only

Date Received:	<u>2-19-19</u>	Date Reviewed:	<u>2-20-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401

Phone: 406-454-6905

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## Commenter Information

Name: \_\_\_\_\_

Complete Address: \_\_\_\_\_

## Comment Subject (please check one)

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

## Comment (Continued)

We already have to tolerate the occasional smell from the Hutterite hog farms south of us. Just how are they going to control the smell from 100,000 pounds of waste per day that's anticipated with this project?

They are planning to dispose of the industrial water waste by spaying irrigation on the fields nearby. Just how much irrigation can the fields handle and where will the excess sewage go?

The increased traffic and noise is also a concern. US Hwy 89 will be congested with large cattle trucks (200 per week) in addition to the proposed employee traffic (3000 employees) 24 hours per day on a single lane highway. The highway deaths on this road will most surely increase! The state would also have to add more lanes to the existing highway at taxpayers expense.

My husband and I moved out to the country to enjoy the peacefulness, fresh air and no close neighbors. With this proposed project our property values will definitely decrease. Would the board want buy a home in close proximity to an animal slaughtering plant? I think not!!

Our home and the current "paradise" that we enjoy would be replaced by stench, noise, excessive highway traffic, traffic accidents, dried up wells and potential health issues!

In closing, we are strongly opposed to this project and are requesting that you deny their permit.

Respectfully,  
Rick + Lauren Pepos

DATE REVIEWED	Completed	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Great Falls, MT 59401

Phone: 406-454-6905

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## Commenter Information

Name: Nate A. Kluz

Complete Address: 597 Armington Road Belt MT 59412 (Physical)  
PO BOX 57 Belt, MT 59412 (mailing)

## 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

The planning department has not completed a zoning change application. Section 14.1.1 provides specific application requirements for a petition to change the Cascade County zoning regulations. Planning staff (Payton, Stone, Hopkins) represented to me on 2/15/19 that the Appendix A+B listed on the county website agenda for the Planning Board meeting on 2/19/19 would suffice. These documents clearly do not meet the threshold of 14.1.1. The appendix give incomplete justification for the "substantial" (County Press Release) changes being made. As such, consideration of the planning department's proposed zoning changes should not be made until a thorough analysis has been done considering all the requirements of 14.1.1. Also, I know of no memo or county rules exempting the planning department from the requirements of 14.1.1. Planning staff on 2/19/19 was also unable to cite a legal exemption from these requirements.

I also find it offensive that public meetings about "substantial" changes are made during work hours. This puts an undue burden and chilling effect on citizen participation in government.  
thank you, Nate

### For Office Use Only

Date Received: <u>2/19/2019</u>	Date Reviewed: <u>2/19/2019</u>	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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401

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## Commenter Information

Name: Stacy Hermler  
Complete Address: 2340 Northern Lights Dr Great Falls 59401

## 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 am writing to request future planning board hearings regarding the significant proposed zoning changes for Cascade county be moved to evening times so those of us working during weekdays can attend. This is a very critical matter affecting our community members and I believe special effort should be made by the county to include public participation and input by all who are interested. I have comments and questions I would like addressed moving forward, and believe it would be beneficial to do so in a public forum. I was unable like many, to attend today because of work. I would also like to request that the planning board allow more time for public review of these massive changes and to voting and making a recommendation to the Cascade County Commissioners. Please consider more meetings than what is currently proposed and at different times. Thank you!

*Stacy Hermler* 2/19/19

For Office Use Only			
Date Received:	<u>2-19-19</u>	Date Reviewed:	<u>2-20-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	



# Public Comment Form

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121 4<sup>th</sup> St N, Suite 2H-2I  
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## Commenter Information

Name: Sherry Lynn Dow

Complete Address: 1433 Eden 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): \_\_\_\_\_

## Comment

I am specifically writing to express concerns with the proposed changes to the county zoning regulations. Nothing should come as a surprise to us ordinary citizens when it comes to lack of government clarity and accountability at any level, and our local county government has certainly not disappointed in these areas over the past year or two. From the less than transparent beginning, the blatant push by county officials to support and assist Ed Friesen with development of the Madison Food Park, at the expense of local citizens, has been shocking and discouraging. Unless my understanding of the proposed changes is completely inaccurate, it seems county government is taking even further steps to ensure that industrial agriculture becomes the most prevalent industry within the confines of Cascade County. I was born and raised in a ranching family. The community I live in is all agriculture. Agriculture...not industrial agriculture. Those are not interchangeable terms. It doesn't take much Internet research to learn of the ills industrial ag has visited on the less fortunate communities in our country. And yet, those in a position to protect our community and agricultural way of life in Cascade County have instead chosen to embrace the beast and do all in their power to protect it, support it, and, in my opinion, ultimately profit from it's existence. Making countywide zoning changes specifically to support one player stinks of bad politics.....worse than the offending odor of the slaughterhouse and it's supporting CAFOs that these changes are trying to shove down our throats. It is time for the planning board and county commissioners to stop answering to one individual and start answering to the masses....those who have elected you to represent our best interests in this county. This starts with changes that are based in solid reasoning and need, not single-sided political gain or promises. It starts with being transparent in word and actions, and striving to give all citizens a voice by holding these discussions on a day and time when the majority of citizens are able to participate.

### For Office Use Only

Date Received: <u>2-17-14</u>	Date Reviewed: <u>2-20-14</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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**Hopkins, Sandor R.**

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**From:** Laura Ravenscroft <ravensngf@yahoo.com>  
**Sent:** Monday, February 18, 2019 11:20 AM  
**To:** Planning Comments  
**Subject:** zoning changes

Please do not make any changes to zoning in Cascade County that would allow companies like Freisen foods to build large meat processing plants. The disadvantages far outweigh the advantages. The pollution to our air and water would be devastating. Great Falls can't handle the huge increase in needs for schools and housing. Jan Cahill was at a meeting last year when he mentioned that this could cause an increase of up to 7000 new students if the full facility came in. He said we couldn't handle that many.

Slaughterhouses bring the need for feedlots. Our beautiful county would turn into a smelly feedlot area. It doesn't take a lot of research to see that there are MANY areas of our country that have regretted allowing these large industrial processors into their area. Lawsuits have been filed to get them to clean up the mess they made.

I have been a resident of Great Falls for 50+ years. If Freisen comes in, I will be moving. Asthma and air pollution don't mix. Studies show an increase in asthma and cancer in areas where these businesses are.

Sincerely,  
Laura Ravenscroft

FOR OFFICE  
USE ONLY

Date Received: 2-18-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No

**Hopkins, Sandor R.**

---

**From:** Laura Hodges <laura\_serena@yahoo.com>  
**Sent:** Monday, February 18, 2019 1:34 PM  
**To:** Planning Comments  
**Subject:** zoning for the Madison Food Park

I will be at the meeting on Tuesday for a short time, but I can't stay. The fact that your meetings are during the hours that many people are at work is not specifically indicative of manipulation. However, it makes it difficult for people to participate in the process of rezoning.

The notion of the MFP is unacceptable for a variety of reasons. The Montana constitution states the right of Montana citizen to a healthy environment. Studies have shown that large-scale animal feeding operations and packing plants contribute to the deterioration of that environment. Animal processing is less destructive on a much smaller scale. In Cascade County we lack the infrastructure, including roads and railroads to allow such an operation to exist without real disruption for the citizens of Cascade County.

Agricultural processing is essential, but processing of crops can be done in a large scale without the deleterious effects of large scale animal processing. Again, animal processing needs to happen, but a large-scale project like the MFP with the attendant feeding operations is not acceptable.

As to the subject to employment, again the MFP makes no sense. We have very little unemployment. According to the presentations, the MFP would bring in 3,000 jobs. We don't have the population to provide workers. To bring in that many workers, plus their families (maybe 9,000 total or about 15% increase in our population) would put unsupportable strains on the city of Great Falls. We already do not have enough midprice housing available. Also, the potentially abrupt bump in the load on our educational system would be detrimental to the students who already live here. Also, our medical resources are barely adequate now, and a 15% increase in our populations would put lives of our citizens at risk.

Ultimately, what benefit could the MFP bring to our community, and what harm could it do? I heard that Mr. Friesen's project was not accepted in his Alberta home. Why would we accept what another place would not accept from one of their citizens?

Please do not do anything that would inflict this terrible idea on Cascade County. This has been my home, my parents' home, my grandparents' home and my childrens' home.

Laura Hodges, 2204 3rd Ave. No., Great Falls, MT 59401 406-231-8488

FOR OFFICE  
USE ONLY

Date Received: 2-18-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No



# Public Comment Form

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

## Instructions

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## Commenter Information

Name: LaLonnie Ward

Complete Address: 70 McKinior 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 Zoning Regulations Revision

## Comment

As I am unable to attend the Cascade County Planning Board hearing scheduled for February 19, 2019, and continue to struggle with comprehending all of the changes and the purposes of the changes proposed to the Cascade County Zoning Regulations, I hereby request an additional hearing be scheduled on a date to be determined by the Planning Board, but at a time more conducive to receiving public comment, such as in the evening.

Your consideration in this matter is greatly appreciated.

\_\_\_\_\_  
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For Office Use Only			
Date Received:	<u>2-18-19</u>	Date Reviewed:	<u>2-20-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

**Hopkins, Sandor R.**

---

**From:** Christine <mesh1000@msn.com>  
**Sent:** Monday, February 18, 2019 6:42 PM  
**To:** Planning Comments  
**Subject:** Zoning Changes

Hi

I am very concerned with the zoning changes you are considering . Especially the one that would allow the development of a slaughter house.

It was not long ago that Montana was in a drought and it could happen again. Clean water is a valuable resource and to allow a slaughter house access to this vital resources is reprehensible.

Question- What do you do when you have a leaky faucet? Why?

Friesen will have access to free water. They will not have to pay a bill. They tell you and us the amount of water the facility will use. Really, they are a corporation and once they have the approval they will do what ever they want to achieve the maximum payout at the cost to the Great Falls community.

Have you thought about the Malmstrom community? The US Air Force already downsized the missile program. The existing missiles could be manned remotely from the other Missile bases which has been discussed. Are you ready to gamble ? Would it be worth it ?

My last question.

Why is it that we have to vote if we want to allow chickens with in city limits but the citizens do not get to vote on the zoning change ? A change that would impact this city which is already struggling. We plan to retire here but if you allow Friesen to get his way . We are out of here.

Think of the legacy you want to be remembered by .

Christine



Date Received: 2-18-19

Date Reviewed: 2-20-19

Complete:  Yes  No

**Hopkins, Sandor R.**

---

**From:** josh wagoner <wagonerjt@gmail.com>  
**Sent:** Tuesday, February 19, 2019 8:51 AM  
**To:** Planning Comments  
**Subject:** Re: Proposed Zoning Changes

I am requesting that Cascade County postpones the decision on the proposed zoning changes until at least mid-March and for this meeting and others like it be held in the evening when working people can attend. Cascade County needs to do better for the citizens that it is supposed to be serving. Improvements like this need to be made to improve trust and transparency and to stop discouraging public participation in our local government.

Josh Wagoner

710 5th Ave N, Great Falls, MT 59401

Sent from my iPhone



Date Received: 2-19-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No

**Hopkins, Sandor R.**

---

**From:** Sandee <sandeelou@charter.net>  
**Sent:** Tuesday, February 19, 2019 1:36 PM  
**To:** Planning Comments  
**Subject:** Meeting 2/19/2019

Your announcement of today's meeting stated "to allow for the presentation of oral comments regarding the proposed changes". You were not really receptive of oral comments. It is also obvious that you do not want public involvement by the resistance to changing meeting times and size of venue. When you will not address the many requests for this, it speaks volumes to the public.

Sent from Mail for Windows 10



Date Received: 2-19-19  
Date Reviewed: 2-19-19  
Complete:  Yes  No

## Hopkins, Sandor R.

---

**From:** Stacy Hermiller <stacyhermiller@yahoo.com>  
**Sent:** Tuesday, February 19, 2019 1:22 PM  
**To:** Planning Comments  
**Subject:** Planning board Meeting Minutes

When will the meeting minutes and/or audio feed of the planning board meeting from today be available for review. Will you be posting them to the cascade county website? I was unable to attend today because of work. I have also submitted a formal comment requesting changes be made to meeting times and more opportunities for meetings with the public be provided, so those of us trying to understand and intelligently comment or question components of the zoning changes have an opportunity to participate and have our questions answered. Zoning is so important to protect property owners. My family has sold our home east of town and moved into the city because we felt vulnerable with the looming threat of the Madison Food Park proposal and were not well protected by current zoning regulations. I still am very concerned that weaknesses in our zoning law and current proposal do not adequately protect property and homeowners in our region. Thank you!

Stacy Hermiller  
2340 Northern Lights Dr.  
Great Falls, MT 59401

4067819809



Date Received: 2-19-19  
Date Reviewed: 2-20-19  
Complete:  Yes  No

**Payton, Ian**

---

**From:** Burke Tyree <burke@tyreeinvestmentgroup.com>  
**Sent:** Wednesday, February 27, 2019 10:07 AM  
**To:** Planning Comments  
**Subject:** Proposed Zoning Comments

Dear Planning Board,

My name is Burke Tyree at I live at 2819 8<sup>th</sup> Ave S., Great Falls, MT 59405.

I am a Real Estate agent and Fly-Fishing Outfitter on the Missouri River. I am 100% for the new proposal and think if we as a community want to see our town and people gain more income and keep a quality of life we need to allow more opportunities for business to blossom.

I am confident with proposal of mixed commercial use and the boards ability to stamp of approval will keep an equal balance of business and quality of outdoor life in these regions. If nothing changes Great Falls and the surrounding communities will continue to struggle with retaining the population and a good quality of living.

Thank you for making this change.

Sincerely,  
Burke Tyree

Dustin Young & Company Real Estate



FOR OFFICE  
USE ONLY

Date Received: 2-27-19  
Date Reviewed: 2-28-19  
Complete:  Yes  No

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FOR OFFICE USE ONLY

Date Received: 3-1-19

Date Reviewed: 3-1-19

Complete:  Yes  No



# 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

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## Commenter Information

Name: Victoria Wells

Complete Address: 116 9th St SW Great Falls, MT 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

I disagree with the Cascade Counties new zoning ordinances against the medical marijuana industry. These new zoning laws make it harder for people to get their medicine. It is legal, it works & so unnecessary to put these providers so far away. The roads are bad & unkept! I am an older person who struggles with daily pain. Someone who has a right to have fair & reasonable access to medicine. The way I understand the ~~app~~ pain pill abuse is rampant Cascade County. I should be doing everything it can to help get these providers setup! Please do the right thing. Thank you Victoria Wells



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
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## Commenter Information

Name: Randy Sandefur  
Complete Address: 1700 6<sup>th</sup> Ave No. Great Falls MT 59401

## 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): mms dispensary

## Comment

I dont agree with zoning changes  
limits my access to my medicine, the  
moving could limit supply due to plants  
not making the move

### For Office Use Only

Date Received: <u>3-1-19</u>	Date Reviewed: <u>3-1-19</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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FOR OFFICE USE ONLY

Date Received: 3-1-19  
Date Reviewed: 3-1-19  
Complete:  Yes  No



# 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@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov).

## Commenter Information

Name: MICHAEL ONSTAD  
Complete Address: 1615 SMELTER AVE, BLACK EAGLE, MT 59414

## 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

THESE NEW ZONING REGULATIONS ARE MAKING IT DIFFICULT FOR PROVIDERS TO FOCUS ON PROVIDING LEGITIMATE PATIENTS LEGAL AND NECESSARY MEDICINE. IN FACT IT IS RUNNING MANY OUT OF BUSINESS WHILE ALLOWING ONLY A FEW VERY LARGE OPERATIONS TO SURVIVE.

I HAVE HAD 3 LOWER BACK SURGERIES, I WAS PARALYZED ON THE SECOND ONE. AT MY PEAK OF BEING ON PRESCRIBED OPIATES I WAS TAKING 5 80mg OXYCODIN WITH PERCOFET FOR BREAKTHROUGH PAIN. I SHOULD BE DEAD. I DIDN'T HAVE TO GO TO 1-2 HEAVY INDUSTRIAL TO GET THE MEDICINE THAT WAS KILLING ME, I WENT TO DSCD IN THE GROCERY STORE.

THIS MEDICINE HAS NO LETHAL DOSE, IT IS VERY EFFECTIVE FOR PAIN RELIEF, EPILEPSY, PARKINSONS AND OTHER AILMENTS. IT WOULD SEEM THAT LONDRANCE IS DRIVING THESE ZONING REGULATIONS. I WOULD ASK YOU LOOK AT THE ADVANCED RESEARCH COMING OUT OF ISRAEL. GOD MADE THAT PLANT. HE DIDN'T MAKE OXYCODIN.



# Public Comment Form

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## Commenter Information

Name: STEPHEN L KIND  
Complete Address: 581 GARDEN HILL RD. 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

AS A LAND OWNER IN CASCADE COUNTY I AM REQUESTING  
HEARINGS ON ZONING CHANGES BE HELD AT OR AFTER  
5:00 PM TO ALLOW CONCERNED CITIZENS A CHANCE  
TO ATTEND.  
I FIND IT VERY DISAPPOINTING THAT THESE MEETINGS  
ARE SCHEDULED, SEEMINGLY, TO DISCOURAGE PUBLIC  
COMMENT & ATTENDANCE.  
I BELIEVE ALL ZONING CHANGES SHOULD  
BE ON A CASE BY CASE BASIS AND NOT A 'ONE SIZE' FITS ALL.  
BY DOING THIS IT WOULD ELIMINATE THE SUSPICION  
OF SOMEONE BEING 'WINNED & DINED'.

### For Office Use Only

Date Received: <u>2-26-19</u>	Date Reviewed: <u>2-26-19</u>	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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## 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 & March 26, 2019 Planning Board Hearing

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY  
Thank you for your timely response to the publics request to schedule further Planning Board Hearings at a time, and in a venue, that encourages and allows for greater public participation. The meeting scheduled for Tuesday, March 26, 2019, at 4:30 pm in the Family Living Center is appreciated as is the five (5) minute public comment period.

The Public Notice states "the purpose (for the hearing) of considering adoption of staff initiated revisions to the Cascade County Zoning Regulations which impact all property which lies within the boundaries of Cascade County,"

1. Is the March 26, 2019 meeting intended to be the final Planning Board Hearing related to the proposed zoning changes?
2. Will planning staff or the Planning Board Members respond to the public's questions presented in writing up to the start of the hearing or previously presented orally at the February 19, 2019 Hearing?
3. When will planning staff prepare the Planning Board packets for the March 26, 2019 Hearing?
4. Will the Planning Board packet for the March 26, 2019 Hearing be made available to the public via the website or do I need to submit a Request for Information?

For Office Use Only			
Date Received:	<u>2-22-19</u>	Date Reviewed:	<u>2-22-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

## Hopkins, Sandor R.

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**From:** Weber, Jane  
**Sent:** Thursday, February 21, 2019 8:01 AM  
**To:** Koehler, Martin  
**Cc:** Clifton, Brian; Payton, Ian; Hopkins, Sandor R.; Stone, Michael; Briggs, Joe; Larson, James  
**Subject:** Re: [cascadecountymt.gov] Contact Form Submission

All - please add this to the Zoning Regulations public comment file.

Thank you,  
Jane

---

**From:** Koehler, Martin  
**Sent:** Thursday, February 21, 2019 7:19 AM  
**To:** \_commission  
**Cc:** \_informationservices  
**Subject:** FW: [cascadecountymt.gov] Contact Form Submission

Forwarding this to you the Commision.

**Martin H Koehler**  
**Endpoint Specialist**  
[Cascade County](#)  
325 2nd Ave North  
Great Falls, MT 59401  
Phone: +1 (406) 454-6793

**From:** webfeedback@cascadecountymt.gov <webfeedback@cascadecountymt.gov>  
**Sent:** Wednesday, February 20, 2019 4:27 PM  
**To:** \_informationservices <informationservices@cascadecountymt.gov>  
**Subject:** [cascadecountymt.gov] Contact Form Submission

Dear Commissioners:

I am writing today to comment on why the original change was made in designating what can be built on the property in question. Why are you carving out a slaughterhouse use on non-industrial zoned land when none existed until one was proposed? You should know that your dealings are seen as extremely nefarious. You KNOW how most of the people of the city and county feel about this heinous proposal, and yet you persist in working toward that end. You are supposed to be representatives of the citizens of this county; not supreme deciders of what will happen despite the prevailing sentiment. At the very least, the future of this "Food Park" should be put to a public vote. I would be very surprised if even 10% of the voting public agreed with what you are doing. In that the doings have been "closed door" and sneaked in, your position is even more suspicious.

Patricia Rosenleaf

--  
Patricia Rosenleaf  
[prosenleaf1@gmail.com](mailto:prosenleaf1@gmail.com)  
406-452-3941



Date Received: 2-21-19  
Date Reviewed: 2-21-19  
Complete:  Yes  No



# Public Comment Form

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

## Instructions

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## Commenter Information

Name: Mike + Deborah Jenkins  
Complete Address: 298 Hastings Road, Sand Coulee, MT 59472

## 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

### For Office Use Only

Date Received:	<u>3-2-19</u>	Date Reviewed:	<u>3-4-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Date: 3/2/2019

To: Cascade County Planning Board; [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

From: Michael and Deborah Jenkins; 298 Hastings Road, Sand Coulee, MT 59472

Re: Public Comment: Part I of II.

We wish to submit our following comments for consideration while reviewing the proposed Cascade County zoning changes:

1. We both are life-long residents of Cascade County, own a small property east of Great Falls in which we reside and farm, work here and pay local taxes, and have a strong interest in seeing our community maintain and improve our healthy, safe, and prosperous environment.
2. We would like to note our appreciation for having a planning board involved in the process and that you are ensuring that public input is solicited, heard, and considered. We are glad to know that the process includes checks and balances like this for best results.
3. We thank you for listening to the public and scheduling the next meeting in the evening and in a larger venue.
4. We applaud the Cascade County Planning Department staff for their efforts to initiate this review and we do believe changes are necessary.
5. We would like to give you a little background on our involvement with zoning change efforts.
  - a. We became more involved with reviewing Cascade County zoning issues in 2017 when a bordering property owner made requests for a special use permit.
  - b. We are a part of a large group of our neighbors and friends that have come together to review Cascade County zoning and processes. Our group has adopted the name Montanan's for Responsible Land Use (MFRLU).
  - c. We have retained an experienced land use expert and together we have been researching our county zoning regulations, the growth policy, and best practices. We have been in continual contact with the planning department staff, county attorney, and commissioners. Through our research, we developed a zoning solution and have been attempting to collaborate with the planning department staff for their expert input and guidance, unfortunately to no avail. Our group met with staff in November and shared our preliminary drafted application to request these changes. We mistakenly thought they would be able to review our suggestions and offer input, however that was not the case, so we finalized and submitted our application on January 17<sup>th</sup> and requested a pre-application meeting. On February 7<sup>th</sup>, we met with the planning staff for the pre-application meeting and again we misunderstood that this would be a meeting where they could tell us if our application had covered all the bases and included everything that they would need to support the application content. We found out at that meeting that they do not review anything until the fee is received, at which point that would start the review process. We did not submit the fee payment yet for a few reasons. First, we wanted to be able to correct and add any additional information that the staff needed and didn't think we

could make any changes once the fee was paid. Second, it is unclear if we need to pay the fee when it is our understanding that a bordering land owner did not have to pay a fee upon their requested changes. Third, the staff made public their own proposal on January 18<sup>th</sup>, without submitting an application nor paying the fee. These factors are confusing the process logic of why we would then need to pay the fee.

- d. Because the staff made it clear that they would not be able to get to our application for an unforeseen amount of time due to their time commitment required to spend towards their proposal as well as the length and complexity of our application content, we have not submitted the fee payment to proceed with our application and instead decided to publicly commenting on their application.
- e. In order to determine what we think is the best solution for the county, we are comparing their proposal to our proposal and will submit a detailed summary in a Part II. We plan to get that to you within a few weeks.

Thank you for allowing for public input and considering it.



# Public Comment Form

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

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## 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 Versions 1.0 through 3.99

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

I have reviewed the Draft Zoning Regulations and the Staff Report in support of the changes prepared for the Planning Board.

I discovered that the 2019 Draft Zoning Regulations, published on the Planning Division website, are dated October 2018 and labeled V4.1. Typically V4.1 indicates Version 4.1.

1. What is the history of the Draft Zoning Regulations?
2. Are copies of Versions 1.0 through 3.99 available?
3. Are there specific public document files for Versions 1.0 through 3.99 of the Draft Zoning Regulations?

In a meeting with Ian Payton and Michael Stone on February 07, 2019 regarding a separate public initiated Zoning Amendment Application, and in the Staff Report prepared for the Planning Board Hearing, the planning division indicates that the proposed zoning regulation changes are "staff initiated." Section 14 of the current zoning regulations confirm that zoning amendments may be initiated by the Planning Division but does not exclude the Planning Division from following the necessary steps including the preparation of the formal Application for Amendment and it's extensive analysis. The Application for Amendment is designed to support and clarify the need for a specific zoning amendment. Requirements include legal descriptions for boundaries of proposed districts, descriptions of existing land use of neighboring areas, anticipated impact on neighboring properties, and specific details to support the criteria, goals, and objectives of the Cascade County Growth Policy. The staff report prepared by the planning division does not provide the analysis of each proposed zoning change. I believe the planning division should prepare more detailed analysis.

### For Office Use Only

Date Received: <u>3-6-19</u>	Date Reviewed: <u>3-7-19</u>	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 4<sup>th</sup> St N, Suite 2H-21  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

## Instructions

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## 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 & Cascade County Growth Plan

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

I have reviewed the Draft Zoning Regulations, the Staff Report, and the 2014 Adopted Cascade County Growth Plan. I am opposed to the 2019 Draft Zoning Regulations because the Cascade County Growth Plan has not been revised or updated in accordance with the requirements of MCA 76-1-601 (3)(f) prior to the substantive proposed changes. Cascade County's Growth Policy, adopted on May 27 2014 and in accordance with MCA 76-1-601, "serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments." The Growth Policy is implemented through regulatory tools including the Cascade County Zoning Regulations. MCA 76-1-601 sets forth the criteria for Growth Policies that include community goals and objectives, inventories of the characteristics of the jurisdictional area, projected trends, strategies for development, and more. Of particular interest is MCA 76-1-601 (3)(f)(iii) which requires a timetable for reviewing the Growth Policy at least once every 5 years and revising the policy if, and when, necessary. Page 10-1 of the Cascade County Growth Policy states the same. It is March 2019, nearly 5 years since the adoption of the current Growth Policy. When asked if the Growth Policy has been reviewed in accordance with the Timetable and Process on page 10-1, County Planners said "no." MCA 76-2-203 sets forth criteria and guidelines for Zoning Regulations. 76-2-203 (1)(a) states "Zoning regulations must be made in accordance with the Growth Policy." Zoning Regulations exist to implement the Growth Policy. The Staff Report Appendix B justifies the elimination of Agricultural zones and the implementation of MU-20 and MU-40 zones citing a few objectives of Growth Policy Goals 1, 5, 9, and 11. What of Goal 2 protecting rural character and relationship with natural resources? Or Goal 3 maintaining our agricultural economy? I believe the Growth Policy is overdue for review. The review of the Growth Policy should occur, and changes adopted, prior to consideration of extensive zoning changes.

### For Office Use Only

Date Received:	<u>3-8-19</u>	Date Reviewed:	<u>3-8-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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## Payton, Ian

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**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



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 14<sup>th</sup> Ave. So.  
Great Falls, MT 59405

*Bertha Olson*

FOR OFFICE  
USE ONLY

Date Received: 3-13-19

Date Reviewed: 3-13-19

Complete:  Yes  No

**Hopkins, Sandor R.**

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**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

FOR OFFICE  
USE ONLY

Date Received: 3-15-19

Date Reviewed: 3-18-19

Complete:  Yes  No

Carolyn K. Craven  
101 14<sup>th</sup> 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 (CO<sub>2</sub>), methane (CH<sub>4</sub>), and hydrogen sulfide (H<sub>2</sub>S), 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.<sup>89</sup> 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.<sup>90</sup> 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.<sup>91</sup> 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.<sup>92</sup> 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.<sup>93</sup> 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 14<sup>th</sup> 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  
121 4<sup>th</sup> 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@cascadecountymt.gov](mailto: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**

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**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

March 13, 2019

Cascade County Planning Division

Attn: Alex Dachs

121 4<sup>th</sup> 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 4<sup>th</sup> 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](mailto: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 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
Phone: 406-454-6905 | Fax: 406-454-6919  
Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

## 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](mailto:planningcomments@cascadecountymt.gov).

## Commenter Information

Name: Carolyn K. Craven

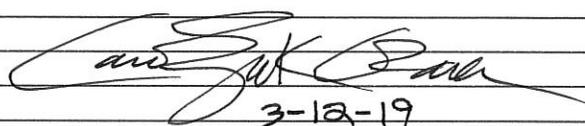
Complete Address: 101 14th Avenue South, Great Falls MT 59405

## 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 14<sup>th</sup> 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 19<sup>th</sup> 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 14<sup>th</sup> Avenue South  
Great Falls, MT 59405



# Public Comment Form

Cascade County Public Works Department Planning Division

121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401

Phone: 406-454-6905 | Fax: 406-454-6919

Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

## 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](mailto:planningcomments@cascadecountymt.gov).

## Commenter Information

Name: Carolyn K. Craven

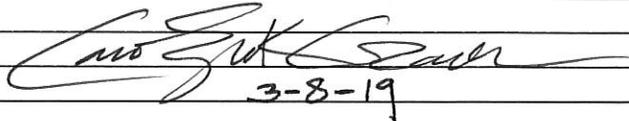
Complete Address: 101 14th Avenue South, Great Falls MT 59405

## 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!

  
3-8-19

### 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
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Carolyn K. Craven  
101 14<sup>th</sup> 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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

## Instructions

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## 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.

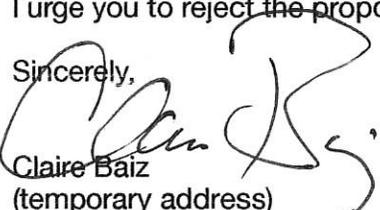
I'm seeing for myself: Big Ag is a bad neighbor.

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

## Payton, Ian

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**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



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 14<sup>th</sup> 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.**

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**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

**FOR OFFICE  
USE ONLY**

Date Received: 3-15-19

Date Reviewed: 3-18-19

Complete:  Yes  No

Carolyn K. Craven  
101 14<sup>th</sup> 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 (CO<sub>2</sub>), methane (CH<sub>4</sub>), and hydrogen sulfide (H<sub>2</sub>S), 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.<sup>89</sup> 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.<sup>90</sup> 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.<sup>91</sup> 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.<sup>92</sup> 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.<sup>93</sup> 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 14<sup>th</sup> 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  
121 4<sup>th</sup> 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@cascadecountymt.gov](mailto: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**

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**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 4<sup>th</sup> 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', written in a cursive style.

Carl Jurenka  
4119 Central Avenue  
Great Falls, MT 59405



# Public Comment Form

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

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## 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 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
Phone: 406-454-6905 | Fax: 406-454-6919  
Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

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## Commenter Information

Name: Carolyn K. Craven

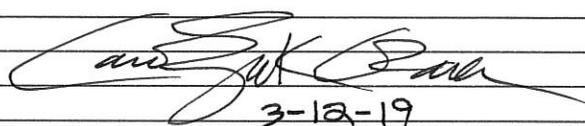
Complete Address: 101 14th Avenue South, Great Falls MT 59405

## 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 14<sup>th</sup> 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 19<sup>th</sup> 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 14<sup>th</sup> Avenue South  
Great Falls, MT 59405



# Public Comment Form

Cascade County Public Works Department Planning Division

121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401

Phone: 406-454-6905 | Fax: 406-454-6919

Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

## Instructions

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## Commenter Information

Name: Carolyn K. Craven

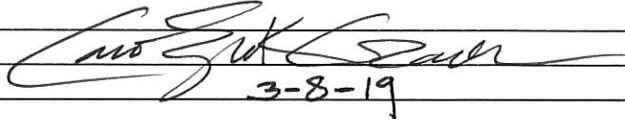
Complete Address: 101 14th Avenue South, Great Falls MT 59405

## 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!

  
3-8-19

### 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
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Carolyn K. Craven  
101 14<sup>th</sup> 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 4<sup>th</sup> 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.

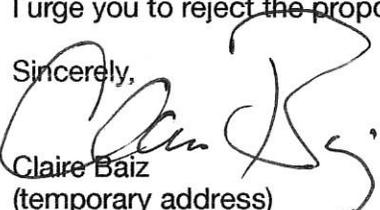
I'm seeing for myself: Big Ag is a bad neighbor.

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 4<sup>th</sup> 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](mailto: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 Departement'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 participae 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 4<sup>th</sup> St N, Suite 2H-21  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

## Instructions

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## 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 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: Alyce Reichert  
Complete Address: 1409 4<sup>th</sup> 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

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	

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