

2 December 2011

To: Director Keith Creagh, Michigan Dept of Agriculture & Rural Development
Michigan Commission of Agriculture & Rural Development
Re: 30 Year Reassessment of Generally Accepted Agriculture Management Practices

Dear Director Creagh and Commissioners,

It is 30 years since the Right to Farm Act was signed into law and GAAMPs were set in place in Michigan. Since then, farms and farm practices have changed drastically, particularly in livestock production with the introduction of liquid manure systems and the application of the liquid manure onto fields with subsurface tiles, as well as the escalation of farm expansion and the concentration of large facilities.

Because of these significant changes in livestock production in Michigan, and on behalf of the groups signing this letter, we are requesting a comprehensive reassessment of the Siting and Manure Management practices related to liquid manure and facility concentration.

We request that this reassessment give the “due consideration” that is required by the Right to Farm Act to current agricultural research and information on the outcomes and effectiveness¹ of practices, not just for particular farm operations but also for agricultural communities and for the environment.

Michigan State University, Sustainable Agriculture and Food Systems, the Michigan Departments of Environmental Quality and Natural Resources, US EPA, numerous universities, and other water quality and air quality researchers and their findings, should all be given due consideration.

MICHIGAN RIGHT TO FARM ACT

Act 93 of 1981

From 286.472 Definitions section:

(d) “Generally accepted agricultural and management practices” means those practices as defined by the Michigan commission of agriculture. The commission shall give due consideration to available Michigan department of agriculture information and written recommendations from the Michigan state university college of agriculture and natural resources extension and the agricultural experiment station in cooperation with the United States department of agriculture natural resources conservation service and the consolidated farm service agency, the Michigan department of natural resources, and other professional and industry organizations.

As is well known now, agricultural watersheds are the major contributors to the nutrient load causing a dead zone in Lake Erie and the toxic algae blooms of recent years. At the Great Lakes Week, held in Detroit from October 11-14, researchers shared studies and reports about toxic algal blooms in Lake Erie, primarily *microcystis aeruginosa*, a type of algae that is toxic to mammals.

USGS research identified the Maumee River (with its Michigan headwaters) as the leading Phosphorus source to western Lake Erie and estimated that 82.6% of that Phosphorus loading comes from farms.² Agricultural streams have been added to Michigan’s 303(d) list of impaired waters for manure discharges, bacteria and nutrient overloads. Yet no changes in manure management practices are required for these impaired watersheds.

We request in particular a re-assessment of those livestock practices most greatly changed in the last 30 years, which have had serious impact beyond the individual farm, on our watersheds and agricultural communities, such as:

Manure Management Practices, including but not limited to:

- Liquid manure application without incorporation into the soil
- Application of liquid manure to frozen and snow-covered ground
- Use of fresh clean groundwater to liquefy manure, immediately polluting it
- Application of liquid manure in impaired watersheds
- Application of liquid manure on tiled fields, designed to drain liquids

Site Selection and Odor Control Practices, including but not limited to:

- Siting additional new large livestock operations, or approving expansion of small operations in impaired watersheds, or in small watersheds without regard to the capacity of the watershed to take up the additional nutrients
- Siting many large operations, and multiple manure application areas, with overlapping downwind effects on nearby residents

As technologies advance and as practices have changed over time, due consideration has not been given to the cumulative effects of practices or to the systemic risks to agricultural communities and resources.

30 years is an appropriate time to stop and re-think what practices are effective and sustainable in agricultural communities, and look ahead to agricultural practices we can all live with, and live well.

Signed,

Janet Kauffman
Vice-President
Environmentally Concerned Citizens of South Central Michigan

on behalf of:

Adrian Dominican Sisters, Program for Justice, Peace, and Corporate Responsibility
Christopher Matthias, Coordinator

Alliance for the Great Lakes
Lyman C. Welch, Water Quality Manager

Clean Water Action
Cyndi Roper, Michigan Director

Clinton River Watershed Council

Environmentally Concerned Citizens of South Central Michigan
John Klein, President

Food & Water Watch
Lynna Kauchek, Senior Organizer

Greater Grand Rapids Food Systems Council
Cynthia Price, Chair

Izaak Walton League of America, Dwight Lydell Chapter
Georgia Donovan, President

Lone Tree Council
Terry Miller, Chair

Michigan Environmental Council
James Clift, Policy Director

Michigan Farmers Union
Sandy Nordmark, President

Michigan Trout Unlimited
David Smith, Chairman

National Wildlife Federation, Great Lakes Office
Andy Buchsbaum, Director

Program of Environmental Studies/Geology, Alma College
Murray Borrello, Director and Chair

Sierra Club, Michigan Chapter
Anne Woiwode, Director

Society for Protecting Environmental Assets
Pat Hjertos, Secretary

1 A.M. Lemke et al., "Evaluating Agricultural Best Management Practices in Tile-Drained Subwatersheds of the Mackinaw River, Illinois," *Journal of Environmental Quality* (2010).

Study concludes: "Conservation planning in tile-drained agricultural watersheds will require a combination of surface-water BMPs and conservation practices that intercept and retain subsurface agricultural runoff. Our study emphasizes the need to measure conservation outcomes and not just implementation rates of conservation practices."

2 Dale M. Robertson and David A. Saad, USGS, "Nutrient Inputs to the Laurentian Great Lakes by Source and Watershed Estimated Using SPARROW Watershed Models," *Journal of the American Water Resources Association*, 8 August 2011.