

From: Jackie Carroll [<mailto:jackie2ku@gmail.com>]
Sent: Monday, February 15, 2016 5:22 PM
To: AD - Schnoes, Helen
Subject: Re: Urban Ag Survey: Lawrence Listens

Hi Helen,

I thought today was the last day for the Lawrence Listens question, but it looks like it closed at midnight last night and I really wanted to submit a response! Hopefully you don't mind me sending you my comments directly.

I am supportive of all aspects of urban ag represented in the survey except for questions #2 & #4, Small Animal Agriculture, especially (but not limited to) on-site processing. I don't think it's progressive, healthy, responsible, etc to promote the slaughter of animals whether in a rural or urban setting.

Looking at the responses on the question, many/most residents include some version of "shield the children," ie, "I don't want to see/hear/smell it." I'm not sure how the city would be able to ensure these things and if they're hidden from our senses too well, how is the city supposed to uphold any of the regulations it sets?

I understand that many cite finances for raising meat animals, but no one can argue that there are ample plant-based sources of protein in town that come at a lower price (& fewer overall resources) than raising an animal for food. When it comes to sustainability, plant-based diets are significantly more responsible. I am quite passionate about this subject, so don't hesitate to let me know if you have any questions.

Thanks for your work!

Best,
Jackie Carroll



Memo to: Lawrence-Douglas County Planning Commission

From: Helen Schnoes, Douglas County Food Systems Coordinator
Eileen Horn, Lawrence and Douglas County Sustainability Coordinator

Subject: TA-15-00346 (Text Amendment for Urban Agriculture)

Date: February 22, 2015

On behalf of the Douglas County Food Policy Council, we once again thank you for supporting a thorough, thoughtful, and engaging process as you have considered the best way to integrate urban agricultural uses into the Land Development Code. We look forward to replicating our positive exchanges and iterative process later this year as we follow the Issue Action Report in creating a Food Plan to incorporate by reference into Horizon 2020.

We stand behind the proposed text amendment before you today. Community input has fueled this text amendment's development—including an online survey in August, a public forum in September, a Lawrence Listens campaign over the past month, repeated food policy council meetings, and the comments you heard at your October and December meetings. It remains clear that allowing home food production and urban agriculture can improve how a family accesses healthy food, how a grower generates supplemental income, and how a farmer launches an enterprise. Urban agriculture also aligns with the long-range planning goal of protecting high-quality agricultural soils.

We thank you for the guidance you provided in December, and the conscientious edits that the Planning Department and Mary Miller have made in the draft before you today. We believe this draft strikes the proper balance at the heart of all planning decisions—how to empower our citizens to live healthy and fulfilling lives, while not impinging on the lifestyle of their neighbors. It recognizes that how urban agriculture unfolds in Lawrence is unique to this community. **We thus commit to working with City of Lawrence Communications and Planning staff to create a number of educational materials around the new policies.**

We believe that the language of the draft text amendment **achieves the goal of limiting restrictions** initially to observe how the public adopts some of the newly permitted activities. In particular, we appreciate the changes in the definition of the Urban Farm and the “grandfathering” of current residents whose current activities qualify as an Urban Farm. As the Special Use Permit remains for an Urban Farm, **we offer our professional assistance in both supporting future applicants as they navigate the process, and reviewing applications with you and the Planning Department staff.**

We ask you to honor the process that has led us to this moment, and **vote to approve.** By spring, we shall perhaps see—to indulge in a metaphor—the fruits of our efforts over the past months come to bear, with residents embracing the expansion of allowed urban agricultural practices. As we said in December, this will show the creativity, ingenuity, and resourcefulness of our citizens to pursue new businesses, secure their family's access to healthy foods, and build a stronger local food system.

Thank you for your consideration and efforts to support urban agriculture in Lawrence.

Helen Schnoes and Eileen Horn
Staff Liaisons, Douglas County Food Policy Council

From: "Almon, Michael" <paradigm@sunflower.com>
Date: 2/21/2016 6:49 PM (GMT-06:00)
To: Mary Miller <mmiller@lawrenceks.org>, "von Achen, Pennie" <squampva@aol.com>, "Britton, Clay" <clay.britton@yahoo.com>
Cc: "Schnoes, Helen" <hschnoes@douglas-county.com>, Brian Jimenez <bjimenez@lawrenceks.org>, Scott McCullough <smccullough@lawrenceks.org>
Subject: Re: February 22, 2015 Planning Commission Agenda Items

Thanks everybody for a good collaborative process to craft this text amendment. I just returned from the New Urbanism/Smart Growth conference in Portland OR, and just now read the present draft of the amendment. I skimmed it all, and looked more closely at the issues that Sustainability Action has previously expressed concerns about. It all seems quite good, and potentially well harmonized with Chapter 9, the Property Maintenance Code.

There are two things that I have a question about.

- 1) I don't see any definition of "agriculture crops", though there are references to "crop agriculture plants", and to "tree farms" being part of "crop agriculture". If this is the case, a lack of a definition of "crops" (the heart of this matter) strikes me as a serious oversight. The concern for me and other permaculture practitioners is that most of our crops are tree crops. The question was raised at a previous sub committee meeting (or maybe even at a previous Planning Commission meeting) that trees should be allowed to be grown in the right of way and in the sight distance triangle as long as branches are pruned up to allow visibility under the canopy.
- 2) The parking requirement for urban farms is one bicycle space for every five required auto spaces. Given the nature of typical urban growers who tend to ride bicycles more than the average citizen, I think that more bicycle spaces should be required.

Other than that, I think you have done a great job.

thank you,
Michael Almon
Sustainability Action

From: JoAnn F [<mailto:sepiaspirt@hotmail.com>]
Sent: Monday, March 28, 2016 10:28 AM
To: Tom Markus
Subject: Urban Ag Regulations

Hi Mr. Markus:

I recently became aware that the city commission is considering changing city regulations to allow backyard slaughter of animals. I think there are likely to be some unintended consequences of this that have not been considered.

First off, is the fact that the vast majority of infectious diseases that have plagued humanity, humans have initially acquired via our domestication and use of animals. TB, Measles, Smallpox, Influenza, Mad Cow Disease are the first that come to mind. In recent years, newly emergent diseases have all been a consequence of animal husbandry. Things like e coli, salmonella, campylobacter -- these too come from our exposure to animals. We only sometimes get these from plants as a result of their exposure to animal's bodies and excrement -- so the more we bring animals into closer contact with humans the more likely we are to encourage the spread of these to humans.

Influenza is one we should especially consider -- as the natural reservoir for it is water fowl, which normally spread it amongst themselves by the oral-fecal route and it does not make them sick, as it can be effectively spread without doing so -- it is only once it jumps from birds in a water born environment to land, that selective pressures encourage the organism to mutate to produce symptoms of sneezing/coughing to facilitate spread OUT of the water. From there it can then spread to mammals and humans. Because China has so many instances of small farms in close contact with other animals and people -- we see an ideal set up for this virus to make the species jump from birds to people -- and so far that has been where many of the most dangerous strains to humans have come from -- do we really want to help Lawrence Ks create similar conditions to China? All flu is originally BIRD FLU!

How will sanitation and hygiene be maintained in densely populated areas too? Will inspectors visit each of these urban animal farms and slaughtering operations to make sure that backyard famers aren't putting their neighbor's at risk, with sloppy handling of carcasses? Will small children playing in the summer rain run-off that travels under the neighbor's privacy fence into THEIR backyard be at greater risk of an e coli or salmonella infection?

Lastly, consider that if you allow slaughter of rabbits and chickens -- what will be LEGITIMATE grounds by which you can exclude the slaughter of cats and dogs for the same reason? You may think now that no one would consider the latter...but that is only because OUR culture considers one perfectly ok to kill and eat and not the other. However increasingly we have people from cultures that DO eat cats and dogs living here, and see absolutely nothing wrong with that. The only basis for allowing one type of killing and not the other is a racist perspective that approves one set of cultural traditions and not the other.

In fact, more and more, as I meet young adults who have been helping out on small local farms and are involved in the killing of animals for food, increasingly they are telling me that they now WOULD just as easily kill and eat dogs and cats for meat IF they were in THAT culture. I believe if you approve the killing of ANY animals inside of the limits of the city, you will just be encouraging MORE desensitization of young people to killing animals in general, and it will just be a matter of time, before someone challenges the arbitrary restrictions that allow killing chickens and not cats. Is that where you would like to see us go?

The Lawrence Listens survey presented an incredibly skewed and biased perspective on this issue. Those in favor urban animal farming are a very small, highly politically active minority, who are already very invested in using animals. The vast majority of residents would not benefit from urban animal farming and have absolutely no idea of the things that I have outlined in this letter -- but I bet if they did, they would strongly oppose slaughtering animals in urban areas.

I urge you to eliminate all aspects of urban animal farming because that would be in the best interest of everyone.

Sincerely,
JoAnn Farb

From: [Julie Jacob](#)
To: [Mary Miller](#); pkelly@usd497.org; julia.v.butler@gmail.com; bcculver@gmail.com; Robert.c.sands@gmail.com; jecarpenter15@gmail.com; squampva@aol.com; clay.britton@yahoo.com; bruce@kansascitysailing.com; eric.c.struckhoff@gmail.com; hschnoes@douglas-county.com
Subject: Urban Agriculture
Date: Monday, March 21, 2016 3:52:42 PM

Dear Planning Commission,

As a dog breeder and exhibitor, when proposals to city code regarding animal husbandry come up I always read them to ensure that I am staying in compliance with the rules in case additional terms are included without publicity. Thankfully, I see that I won't be affected by the upcoming amendments to city code.

I do have a curious question though. Article 5, 20-547.1.ii indicates that small goats and sheep may be slaughtered for personal use. Yet Article 5,20-547.5.iii requires that goats over the age of 4 weeks must be neutered. First of all, this section refers only to the neutering of goats, not sheep, and that seems to be a disproportionate measure. Did the writers of the proposed codes get information from goat and sheep breeders on the proper age to wether a buck? From a few quick searches it seems to me that this is quite young and can harm the proper growth of a goat's urethra, thereby causing lifelong problems. I'm going to presume that the requirement to wether bucks is due to the odor issue that comes along with an intact male. And then assert the opinion of allowing slaughter but restricting breeding via the wether requirement seems counterproductive from a sustainability standpoint. Ie. You can grow and harvest them, but you can't make more.

I also have concerns about zoonotic diseases brought in by urban agriculture that can impact not only my own breeding canines, but altered canines and felines that are owned for pet purposes only. The 3 major diseases that are of utmost concern are brucellosis, coccidia, and giardia. While brucellosis must be transmitted by direct contact or contact with contaminated water, coccidia and giardia contaminate the soil and can remain infectious for years. Anyone operating with small animals should be required to inform neighbors and disclose it upon sale or and transfer of the property utilized.

Thank you for your time and work on this proposal.

Julie Jacob

Whirlwind Keeshonden

Lawrence, KS 66046

From: David Reynolds <engineer.dr98@gmail.com>

Date: March 22, 2016 at 8:19:18 PM CDT

To: sboley@lawrenceks.org

Subject: Proposed Urban Farming Ordinance

Stuart;

The ordinance under consideration allowing “Urban Farming” raises many questions related to residential businesses, neighborhood impacts, potential diseases, city inspections, permitting such usages & inspections for city compliance & county & federal health compliance.

I realize there is a major push with some to promote the greening of America & to live a healthier lifestyle. While pursuing such goals we should not ignore the impacts on neighborhoods, families and existing desirable lifestyles.

Thus a number of legitimate questions need to be answered.

First “The Neighborhoods”:

Who will manage and take timely action with unkept yards and recalcitrant urban farmers?
What would be the schedule for rectifying neighborhood sanitation issues?

Farm animals attract predators: Stray dogs, fox, & coyotes (all seen in the western subdivisions as we move into their habitat). Rodents are also attracted to poultry pens & feed areas due to the feed is in the open & on the ground.

How will allowing neighborhood retail sales of urban farming products be compatible with &/or change existing ordinances regarding businesses in neighborhoods?

Why allow retail sales in a quiet neighborhood? Why not restrict these sales to “Dailey Farmers Markets at churches, commercial parking lots, schools, designated city parks or city owned sites throughout the city versus residential neighborhoods?

What kind of sales displays will be allowed on Residential lots? A “road side shack” type display, or garage sale tables like a farmers market, or something restricted to inside the garage, or maybe just garage sale clutter displays? What condition/standard level must the displays be maintained? Something that at a minimum, doesn’t diminish the value of the neighborhood?

Will these new businesses be required to be licensed, especially due to health concerns? These are different from existing farmers that already know how to handle such issues.

How will allowing retail sales produce & meats from residences be managed & inspected? The best situation may be to not allow the sale of meats & fish of any type.

What about signage, in yards, along streets, subdivision entrances, etc?

How will increased traffic be addressed, especially as it relates to children playing within the neighborhoods?

How & where will the animals be kept? Who manages their well being? What are the allowable esthetics of the chicken coops & goat barns? Will the coops & housing facilities for the animals be required to be hidden from neighbors view? What kind of condition will they be required to be maintained?

What row crops will be allowed? How tall can they grow? How or will the size of crop plots be limited versus yard size?

Second “Health Concerns”:

The insurance industry has a category called “Attractive Nuisances”. These items increase the risk of injury or disease. I believe we all understand how a child is attracted to a small animal.

Chickens particularly are disease carriers as follows:

Chicken droppings like pigeon droppings are considered a health hazard.

Salmonella and Campylobacter are common public health hazards potentially associated with chicken contact. These bacteria are carried by healthy chickens and are communicable to people through direct contact, exposure to manure, or consumption of undercooked chicken and eggs.

Histoplasmosis can cause a respiratory disease with cough and shortness of breath. The fungal organism causing this disease is present throughout the Midwest but can be concentrated in areas with quantities of bird droppings. Persons acquire the disease by inhalation of the organism from the environment.

What about sanitation? Animal droppings can be full of diseases. Will the city require frequent cleaning of the chicken coops & goat barns to control manure runoff? Who inspects to ensure this is happening? These types of animals destroy turf. What is to keep the chicken & goat dung from running onto neighbors lots or into drains & waterways? In dry weather droppings & manure break down and can become airborne, this also makes them more susceptible to run off.

Many subdivisions have waterways or retention ponds on them and they can be contaminated by run off from adjacent sites. These ponds can become contaminated with phosphorus, and algae blooms. The pond in Oregon Trail is a city park which collects the surface run off from the subdivision.

How will the waste products of the slaughter of the livestock be disposed? Will there be special locations for disposal? Or do we just allow the blood, bones, feathers, fur/skin & entrails to be

thrown in the trash or go down the sink disposal? How long can these be maintained on site before bacteria, odors, etc become concerns? This is a concern even if the meat is only for family consumption.

We are allowing neighborhood “Micro Grocery Stores”. Who oversees the sanitation and federal meat quality standards with these retail stores? As that is what they are. There is a reason health & quality standards exist. Is the city going to accept responsibility for health issues related or will there be unregulated sales of meat products?

There are many reasons & much history why urban areas have existing rules against these farming activities within the city limits. I hope the city is not blinded by its exuberance for being “Green”, and considers all the issues surrounding these Urban Farms/Homesteads before allowing such activities.

Thank you for your attention to these matters.

David Reynolds

Lawrence, Kansas

From: [Marilyn Teeter](#)
To: [Mike Amyx](#); [Leslie Soden](#); [Stuart Boley](#); [Matthew Herbert](#); [Lisa Larsen](#); [Mary Miller](#); [Eileen Horn](#); [hschnoes@dougals-county.com](#); [director@lawrencehumane.org](#)
Cc: [nwentling@jworld.com](#)
Subject: Lawrence "Urban Agriculture" Initiative
Date: Saturday, March 26, 2016 12:05:01 PM

To: Lawrence City Commission
Lawrence Planning & Development
Douglas County Food Policy Council
Lawrence Humane Society
cc: Lawrence Journal-World

**Re: Lawrence "Urban Agriculture" Initiative
Potential Communicable Diseases and Parasites
Humane Treatment of "Farm Animals"**

Like many of my neighbors, I only recently became aware that the City of Lawrence is considering expanding its "urban agriculture" options to include other "farm" animals in addition to chickens via the Journal-World's article on March 21.

In addition to addressing the obvious issues of sanitation, excrement accumulation, odors, noise, and the extremely offensive idea of allowing people to kill animals at will in a residential setting, I strongly hope that the City is also addressing:

- (a) the issue of the numerous potential communicable diseases and parasites (viral, bacterial, intestinal, and dermatological) that could infect neighboring humans and domestic animals as well as wildlife, and
- (b) the care and treatment of "farm animals," which are currently not covered by the City code's prohibition against cruelty to "domestic animals" (defined as animals "bred for and adapted to living dependently in an urban household setting"), and are specifically exempted from animal cruelty statutes by the State of Kansas (K.S.A. 21-6412 through 21-6417).

In Kansas, the only legal limitation concerning treatment of "farm animals" is that it be in line with "normal or accepted practices of animal husbandry ... including animal care practices common in the industry or region."

As I'm sure you know but may not have thought upon recently, "normal or accepted practices of animal husbandry common in the industry or region" do not require anesthesia, a veterinarian's oversight, or any previous training to perform any procedure, and include:

- castration using a knife or a tight band around the base of the testicles to cause gangrene (the USA is the only industrialized nation that does not prohibit castration without anesthesia);
- electrical shock applied to the genitals of males to induce ejaculation;
- burning the flesh with a hot iron to create markings;
- cutting off of the horns;
- piercing the nasal septum and inserting a ring for inflicting future pain to induce tractability;
- cutting or piercing of the ears;
- cutting off the beaks of chickens and turkeys;
- cutting off the toes of chickens to declaw them;

- nailing the feet of geese in order to force-feed them to fatten their livers for paté;
- tight confinement such that animals cannot stand or turn around;
- exposure to extreme temperatures with no provision of shelter.

Concerning the killing and butchering of “urban farm animals,” the Journal-World reported that “more rules were added” to the original proposal, but did not indicate what those might be, beyond “outside of public view.”

The killing of large four-legged species of “farm animals” within USDA-approved slaughterhouses is covered by Federal law (U.S.C. 7-48.1902), which requires that they be “rendered insensible to pain by a single blow or gunshot or ... other means that is rapid and effective” before killing, unless the killing is done in the Jewish tradition of allowing the conscious animal to bleed to death from severing of the carotid arteries. I find nothing that addresses any other situation, particularly individuals in their own homes. Neither Federal nor Kansas law prohibits any manner whatsoever of killing small four-legged “farm” animals or birds.

I know that everyone dreaming the “urban agriculture” dream has good intentions, that they themselves may not wish to do cruel things whether “acceptable” or not, and that we all like to envision ourselves living in a caring, humane, green community. The fact is that this is a diverse community, we don’t all see things the same way or share the same sensibilities, and there have been heated disagreements here in the past even over what conduct should be allowed towards Man’s Best Friend, the dog.

So, before the City embarks on this road, please make every effort to ensure that all possible aspects and outcomes of “urban farming” have been considered, not just the pretty ones, and that at a minimum, effective tools are put in place to deal with the inevitable future problems that will arise.

Thank you for your time and attention,
Sincerely,

Marilyn M. Teeter
785-832-8637
3700 Overland Drive, Lawrence