

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / June 10, 2014
City of Tucson

The following written comments and questions were received from participants at the June 10, 2014, Public Meeting on the City's effort underway to revise zoning regulations on community gardens, farmers markets, small urban animals, and urban farms. Participants were asked to specify which category each of their comments pertained to, or to specify "other." Please note when a category was not specified, or there were multiple comments on one comment card, staff made a judgment about how to categorize comments.

Transcribed by Office of Integrated Planning staff.

SMALL FARM ANIMALS

- The existing setback distance of 50 feet for structures used for farm animals is too great. The proposed 20-foot regulation is much more reasonable.
- Pygmy goat is a breed of meat goat. Does this exclude dwarf and mini-dairy goats?
- Advocates of no-regulation ignore the needs of the animals for adequate living space. Cooped-up chickens and rabbits can easily be over crowded. Backyard small animals are rarely kept in structures which give them sufficient space. Often they are close to factory conditions. Same for goats. If no-regulation meat consumers are concerned about the quality of meat, they should consider that overcrowding raises stress hormones and affects the meat.
- Why was "eight" picked for number of chickens allowed? It seems arbitrary. I currently have seven chickens. Lately I have been short on eggs because of a broody hen and due to the heat. Eight hens would not provide enough eggs for many families and communities. My seven hens are hardly providing enough eggs for just my husband and I.
- I think that difficulties should be handled case by case. The masses should not be regulated to prevent a few issues that may arise.
- Small animals should look at total weight of the animals to compensate for type of animals. Chickens and rabbits are not equal to goats or sheep.
- As a rabbit enthusiast your policy will prohibit me from raising the meat that rabbit keeping provides. Two females and a male are all you allow. There is no allowance for offspring even if they are present for only a few months. The proposed policy just shut me out of a very low impact food source! To promote the production of more food we need fewer regulations not more.

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / June 10, 2014
City of Tucson

- Maybe since the set back is being reduced to about half, we could have half as many chickens? So 12 instead of 25 hens and 50 ft. set back.
- Allow 16-24 chickens. Otherwise use animal unit guidelines.
- Numbers are too restrictive, especially with regard to rabbits and chickens.
- Re: concerns about regulating problems that don't yet exist as some people choose to interpret this position of the code – I don't see the code as a process of dictating how people should be living, but more as providing a framework for neighborly standards of conduct to avoid potential conflicts. There are differences between the clarification of limitations and the facilitation of articulating responsibility – I support the City in taking a positive, provocative approach in these matters, rather than focusing on the negative aspect inherent in being a member of society. As has been stated if it's not causing a problem, there shouldn't be a concern as there won't be a complaint – but the homeowner will be able to have standing under the ordinances to say "I'm conducting a legal, clearly valid activity – so since I'm in compliance, find a different problem to take issue with."
- I would propose that the raising of small farm animals be allowed in R1 & R2 with an influence on the animals being raised in a humane way.
- Limiting the number and size of animals is too restrictive. Limiting the number of fowl to 8 and the number of small farm animals to 3 doesn't allow for homesteaders to raise the livestock that they desire. Restricting goats to only miniature goats is burdensome and unnecessary. What difference does it make to the City if miniature or not?
- When does a chick become a member of a flock and when do my rabbits "count"? If my rabbit has 5 babies, I'm over limit. By what age do I need to process or sell them?
- Why weren't animal units used rather than the current proposal. It would allow for larger properties to have more animals. It appears to be the most equitable solution.
- We have an "urban farm" that has been in production since 1950. The city has grown up around us. Do "grandfathered" rights protect us from new zoning regulations?
- Why were only dwarf Nigerian goats included under small farm animals but not any of the other recognized miniature breeds or those of sheep and cattle?
- In regards to the size of my coop – creating a fixed size of the coop I feel should be circumstantial. I am over 6 feet tall and like to keep my coop clean and be comfortable doing it. Also my neighbor's wall is 10 ft. tall and the coop cannot be seen unless you come in my back yard. I like having a long coop/run that my chickens can get some exercise while I'm at work until I can get home and take care of them.
- Change definitions so small farm animals exclude fowl and have standard for fowl separately.

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / June 10, 2014
City of Tucson

- 8 chickens (or fowl) is a very reasonable number of birds in R01. Don't reduce that number! 12 is a more reasonable number.
- Reducing the number of fowl permitted by 2/3rds from 24 to 8 is extreme, arbitrary and unfair, and makes no distinction between standard-sized hens and small bantam chickens. Bantams should be allowed in greater numbers at a 2 to 1 ratio to standards hens.
- The total of 8 allowed is too small to provide a family with a consistent supply of eggs year-round. The current limit of 24 hens has been reasonable, but if you feel the number must be reduced, consider a 1/3 reduction to 16.
- Reducing the distance a coop must be from another residence from 50 to 20 feet makes sense – but it should be the distance from a primary residence, not a guest house, or back-lot rental.
- I think that the size of the goats should be re-evaluated, full size goats are needed in order to get milk from them for food. Full size goats are still much smaller than each of my 200 lb. dogs and would not cause average increased problem for neighbors but would allow me to provide milk, yogurt and cheese for my family.
- Instead of reducing the number of chickens by 2/3 it should if needed be only reduced by 1/3.
- (1) Last time we were here, Adam said that if we were currently within code then we would continue to be in compliance. Is it possible to include a 50 ft./24 chicken provision in order to keep the old standard in addition to the new 20 ft. chicken limit?
- If the animal unit approach would allow more chickens on average per lot than the flat (8) number, can the flat number just be raised to a number like 12 to avoid the nuanced formula? Basically, I hope the choice isn't between the #8 and the unit approach.
- Change the regulations to animal units, based on the space available to the animals. The preferred regulatory approach should be nuisance regulation, not arbitrary numbers.

URBAN FARMS

- Primary use should be allowed for animal or crop production. Specifically a property that is abandoned or the residence destroyed and a neighbor buys that lot for those purposes.
- The State of Arizona has specifically denied cities and counties the ability to regulate agriculture and gardens and the sale of agriculture products. The State Agriculture Protection Act allows home gardening and small agriculture without regulation.

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / June 10, 2014
City of Tucson

- Greenhouses – Is 12 ft. height from base to peak? For larger lots, > 3 acres, this should be higher, especially if one is to create a principal use urban farm for mid-scale production. Need taller greenhouse (20-25 ft.) for commercial style production.
- Why would there be regulations regarding the square footage of accessory structures? i.e., the 25% rule for home occupations. Thank you for the meetings!
- No difference between Urban Farm and Crop production as defined. Change Urban Farm to include increased # of small animals in addition to crop production.
- Just because we haven't turned our neighbor's illegal chickens into the enforcement cops, doesn't mean that there are no problems. Recently they left for 10 days during 110 degrees heat – the smell over Memorial Day weekend was so bad we could not use our yard. The poor chickens.
- I live out by Ryan Airfield and have a large garden (not quite a farm). I also have 3 milking goats. If I have been keeping these practices for the last 15 years will I be grandfathered in?
- Re: concerns about enforcement / public process – makes sense to be as permissive as possible, and I do believe the City's efforts are towards that end – the focus should be on establishing clear standards with reference to the appropriate nuisance ordinances and public safety requirements within which these activities are being conducted.

FARMERS' MARKETS

- 5 PM crossing time unreasonable: Growers & buyers have daytime jobs. 7 – 8 PM makes more sense.
- Regulation regarding hours of operation should consider Tucson climate and daily schedule of working class. Extend hours later than 5 PM.
- The restrictions – stop at 5 PM – are not logical. Later hours may be better for growers, who hold daytime jobs, and shoppers the same.
- In regards to the restricted hours for residential farmers' markets. 1) Markets will only be viable if they can be held at times when customers can shop (i.e. not during work hours) 2) Climate in Tucson, esp. in summer, requires outdoor markets to be early / later in the day. 3) There is a finite number of producers currently selling at markets. They can't all sell only at weekend markets. Weekday evening markets are critical to the diversity and viability of farmers' markets in Tucson.
- If liquor stores can sell after 5 PM then so should veggies! We want healthy barrios now!! Accessibility to healthy food for working families after 5 PM.

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / June 10, 2014
City of Tucson

- Time limits on site sales. 7 – 5 PM limit unreasonable. Tucson esp. in summer activities in early morning / evening hours. Weekends should not be restricted to early cutoff in evening. What about access to people who are working during 7 – 5 PM business day? Why not 7 – 7 during weekdays?
- Does the 300 ft. apply to the edge of the parking lot to the residential neighborhood or from the farmers' market itself to the neighborhood?
- Local farmers' markets are the natural outlet for local foods. Let's not inhibit them.
- Is there a grid-type breakdown of not just the above categories, but each within the subcategories of principal/accessory use as well as the different zones (residential/commercial, etc.) It may help people visualize those distinctions and possibly alleviate some concerns.

	Principal	Accessory
Zone		
Topic		
Etc.		

COMMUNITY GARDENS

- Sales should be allowed for produce sold on-site AND in the yards of garden members.
- Community gardens are the only places where apartment dwellers and super-small-lot home owners can garden. Thankfully we have a vibrant community garden-wise. These gardens are a necessity to urban-raised food.
- Wonderful to see the relative access granted to this category – will be interesting to see how the other topics integrate and evolve with regards to this central idea of urban agriculture with community gardens as a sort of stable hub for all these activities,

OTHER

- Why is there no distinction either geographically or parcel size for residential zones? These problems would affect properties in the center of town the same as larger properties on the outskirts of town (which were annexed after agricultural activities had been going on.)
- Please increase the number of allowed advertised sales of vegetables and eggs to something much higher than 4 or eliminate this regulation entirely.
- How does ordinance address fish farming in residential zones?

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / June 10, 2014
City of Tucson

- It is not necessary to limit the number of chickens on your home property. Whether or not maintaining chickens should be allowed should be based on nuisance rules already in place for the City. Do not reduce the number of allowed chickens!
- Adopt zoning and land use regulations that promote and facilitate locally produced food... and safe, equitable growth and distribution of locally produced food. Not just regulate and negatively impact the economy.
- How does urban agriculture affect property values in residential areas?
- Since the majority of fans and heaters used with greenhouses are 60 DB or lower at the source, which is under the 70 DB residential level set in 16.31 why is it necessary to regulate setbacks, screening and sound baffles along with those required with hydroponic and aquaponic systems?
- When email is viewed on a mobile device it looks like spam or other mail might not want to open.
- Add Accessory and Principal to definition list.
- I wish the government would get out of my private life.
- Greenhouses – RH & SR – Revisit setbacks – too prohibitive
- I have read your comparison of existing vs. proposed policy. In a few cases the new policy promotes and facilitates your goal. But every time you put up additional barriers you reduce participation. It looks to me like we are headed toward a net reduction in food production and that sustainability is equally threatened.
- It doesn't have to be neighborhood associations vs. urban agriculturalists. The president of our association is all of 30 years old and he and his wife raise chickens. They also raise their own vegetables.
- I like the "how-to" class idea. I'd like to see these classes in as many parts of town as possible.
- An urban model to consider: The City of Tomorrow in England. Also call "Incredible Edible Tomorrow." The City has widespread urban agriculture in place.
- For those who have concerns about what may / may not happen, I'd like to suggest an Urban Agriculture Corps. These volunteers could engage with friends, neighbors, coworkers, colleagues, etc. to dispel the myths around what we do. (We might even recruit a new urban agriculture practitioner or two?)
- I see this as an attempt to regulate "sustainability." Not increase "sustainability."
- The only thing that needs definition is sustainability. One would only have to show that they meet that definition to allow them to continue doing any of these things.

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / June 10, 2014
City of Tucson

- If the sustainable code project does not pass will the current zoning codes remain in place or will a new code be drafted?
- On-site sale of produce: I think the onsite sale of produce should be permitted more frequently than yard sales – at least once a week – because produce is perishable. To equate them to a yard sale is silly because you can't just throw a tarp over a crate of carrots and sell it the next day so I have to bring everything in anyway. I already sell weekly. Also I sell in the evening when people come home from work so I think the hours should go later.
- There is cognitive dissonance going on: living in the city may not be compatible with back-to-the-land ideas. The average city backyard may not be the place for raising meat-producing animals. Pigs have been raised in bathtubs – but how do the pigs like it? Sacrificing animals' well-being so we can feel good about our food is a contradiction. If we want to eat meat, we must do the raising in the most humane manner.
- Air quality – what about the Border Patrol and liquor, _____, driving through our barrios, power plants, etc. polluting our air. Deal with the real problem not the solution.
- Saw no mention of bee-keeping regulations or standards.
- How well do the proposed regulations fit with existing urban agriculture use? Has a survey been done? If so are results posted? Ex: If most keepers of backyard fowl keep 10 – 12 chickens with no complaints why suddenly limit them to only eight?
- Also good to see a nuisance-driven approach with these issues. May be helpful to try to offer the other categories framed in such a manner as well – to ensure that the emphasis is properly understood by those who more easily glean the information from a visual, than textual form. (A “concept map” that shows an example in the actual context of the city.)