



PLANNING COMMISSION

Planning & Development Services Department • 201 N. Stone Ave. • Tucson, AZ 85701

DATE: August 20, 2014

TO: Planning Commission

FROM: for Ernie Duarte
Executive Secretary

SUBJECT: C8-13-03 Unified Development Code Text Amendment: Urban Agriculture – Information Item

Issue

This item is an update to the Planning Commission on the proposed urban agriculture standards and is scheduled as an information item.

A growing local interest in sustainability, health, and urban agriculture has contributed to the inclusion of policies specific to urban agriculture in Plan Tucson, the City's General and Sustainability Plan ratified by voters in November 2013. These policies serve as a basis for the proposed changes to the UDC. More details on the Plan Tucson policies are provided below.

Concurrent to the development of Plan Tucson, the City of Tucson was awarded an *Energy Efficiency Conservation Block Grant* by the Department of Energy in 2008. The grant is being used for a variety of programs and projects in keeping with the Mayor and Council adopted Sustainability Framework, including the Sustainable Code Project (Project).

The UDC is silent, unclear, or overly restrictive on urban agriculture. The current standards are based on a time when "agriculture" was associated with "rural" areas. Accordingly, the agricultural standards in the UDC are designed for larger commercial-agricultural operations. Some urban agricultural uses have occurred through zoning determinations, which contributes to uncertainty about future issues.

The purpose of the Project is to facilitate and clarify/remove regulatory obstacles pertaining to: 1) urban agriculture; 2) solar development standards; and, 3) other miscellaneous "green" improvements to the Unified Development Code (UDC), including rainwater cistern standards. Each component of the Project is being developed and processed separately. The first component is standards pertaining to urban agriculture.

The proposed amendments to the UDC are in following areas:

Uses

- Community Gardens (principal or accessory use)
- Urban Farms (principal and home occupation)

- Farmers' Markets (accessory use only in residential and office zones, principal use in other zones)

Accessory Use Only

- Keeping of Small Farm Animals
- Gardens
- On-site sale of products grown on-site
- Composting
- Greenhouses

A summary of several key areas are provided below in the “Overview of the Draft Urban Agriculture Proposal” section. A detailed accounting of the current and proposed regulations is provided in Attachment B: Comparison of the Current and Proposed Urban Agriculture Regulations.

Recommendation – It is recommended that staff continue to refine the draft amendments to address the issues raised at the public meetings. The revised draft will be presented at another public meeting in September. Staff expects to return to the Planning Commission for a study session mid- to late-Fall.

Background

Plan Tucson

Plan Tucson, which provides long-term goals and policies to assist decision makers in taking action related to elements important to a livable community, includes the following policies related to urban agriculture:

- Improve access to healthy, affordable food particularly in underserved areas of the city.
- Reduce barriers to food production and to food distribution, including home and community gardens and facilitate access to new markets for small-scale farmers and gardeners.
- Adopt zoning and land use regulations that promote and facilitate the safe, equitable growth and distribution of locally produced food.
- Facilitate community food security by fostering an equitable, healthy local and regional food system that is environmentally and economically sustainable and accessible to all.
- Collaborate with key partners to facilitate new opportunities for urban-scale gardens, farms, gleaning, and distribution systems.

Plan Tucson, which had an active public participation process, was ratified by the voters in November 2013.

Development of the Draft UDC Amendments

Following acceptance of the Energy Efficiency Conservation Block Grant and initiation of the Sustainable Code Project by the Mayor and Council, Clarion Associates was contracted to prepare a sustainability analysis of the UDC and to draft amendments to code where obstacles were identified. As part of this process, Clarion interviewed local stakeholders from a variety of backgrounds and interests. Areas in which obstacles were identified included urban agriculture, solar development standards, and other miscellaneous items.

Clarion completed draft amendments of all three areas in 2012. Staff revised the initial draft amendments, and starting in early 2013, began gathering input and feedback from stakeholders.

Stakeholder Involvement

The following is a timeline and summary of the stakeholder involvement in the development of the draft urban agriculture amendments:

Neighborhood Meeting

September 17, 2013 Staff met with a group of neighborhood residents to discuss an early draft of the amendments and to receive comments, suggestions, and questions. Eleven people attended.

Sustainable Code Committee

March 2013 – August 2013 The Sustainable Code Committee is an ad-hoc committee of professionals working in sustainability-related fields, neighborhood representatives, and developers. The committee made a recommendation on the urban agriculture amendments after six months of discussion.

Urban Agriculture Task Force

October 2013 – December 2013 The Urban Agriculture Task Force was formed in response to objections raised to Sustainable Code Committee recommendations on urban agriculture. The task force was an ad-hoc advisory group comprised of Sustainable Code Committee members and neighborhood representatives. The task force met four times, but was unable to reach agreement on many points. The task force agreed to stop meeting in

favor of conducting wider community meetings.

Public Meetings

May 13, 2014

The focus of the meeting was to describe what led to the effort to revise the zoning regulations pertaining to urban agriculture and to receive stakeholder questions and comments. Approximately 130 people attended. See Attachment C for a detailed accounting of the participants' written comments and questions and staff responses.

June 10, 2014

The focus of the meeting was to review the proposed revisions and to listen and respond to participants' comments, suggestions, and questions. Approximately 150 people attended. See Attachment D for a detailed accounting of the participants' comments, suggestions, and questions (a written response from staff is being prepared).

July 23, 2014 (Spanish only)

A Spanish only meeting was held to describe what led to the effort to develop urban agriculture standards, to review the proposed revisions, and to receive questions and comments. Approximately 30 people attended the meeting. See Attachment E for a detailed accounting of the participants' comments, suggestions, and questions (a written response from staff is being prepared).

September 2014
(exact date to be determined)

Staff will present a revised proposal based on staff's review of public input received at the previous public meetings and through emails and other means.

*Education and Outreach
(post adoption)*

Staff will: 1) prepare a brochure summarizing the approved regulations and indicating places where people can learn more about how to do urban agriculture; and, 2) coordinate with the Community Food Bank and other organizations to conduct "how-to" classes.

Overview and Evaluation of the Current Regulations Related to Urban Agriculture

In general, the current standards are based on a time when "agriculture" was associated with "rural" areas. Accordingly, the agricultural standards in the UDC are designed for larger commercial-agricultural operations. For example, the General Farming use, which allows any

combination of Animal and Crop Production limited to personal use, is not permitted in the Urban Residential and Nonresidential zones.

Some urban agricultural uses have occurred through zoning determinations, which contributes to uncertainty about future issues. For example, the UDC does not specifically mention, nor include guidelines or regulations pertaining to community gardens. Consequently, many of the approximately 30 community gardens in the City have been allowed through a zoning determination.

The keeping of small farm animals in the current standards is limited to fowl only and do not address the other types of animals being raised in urban settings, such as miniature goats, rabbits, ratites, and rodents. Additionally, the setback requirements for animal shelters, of at least 50 feet, from every property line precludes many mid-town residents from keeping small farm animals legally.

A detailed accounting of the current and proposed regulations is provided in Attachment B: Comparison of the Current and Proposed Urban Agriculture Regulations.

Overview and Evaluation of the Draft Urban Agriculture Proposal

Note: the information provided in this section is draft and subject to change. Presently, staff is evaluating the input and feedback received at the public meetings, much of which is that the draft proposal is too restrictive and does not adequately facilitate urban agriculture. Staff will be revising the draft proposal to address the issues raised.

The draft proposal attempts to facilitate and clarify/remove regulatory obstacles to accommodate agricultural activities in the urban residential and nonresidential zones at a smaller, less intensive scale than larger commercial-agricultural operations permitted today in the rural and suburban zones. An example of this is the introduction of the Urban Farm use that would allow the growing of crops and the keeping of small farm animals as an accessory use in the Urban Residential and nonresidential zones. The proposed use-specific standards include mitigation standards to better ensure that the Urban Farm use does not create a nuisance for nearby residents and business owners.

The draft proposal eliminates the need for zoning determinations when establishing urban agricultural uses as is the case currently, for example, for community gardens.

The proposed keeping of small farm animals standards:

1. Acknowledges the other types of animals being raised in urban settings;
2. Reduces the animal shelter setback requirement to 20 feet from an adjacent residence to accommodate many mid-town properties; and,

3. Creates a much more nuanced approach to determining the maximum number of small farm animals permitted that takes into consideration lot size and the type of animals.

The draft proposal also expands the number of zones farmers' markets may operate.

A detailed accounting of the current and proposed regulations is provided in Attachment B: Comparison of the Current and Proposed Urban Agriculture Regulations.

Attachments

- A – Summary of the Proposed Changes to the April 2014 Draft
- B – Comparison of the Current and Proposed Urban Agriculture Regulations
- C – May 13, 2014 Urban Agriculture Public Meeting No.1 Participants Written Comments Questions and Staff Responses
- D – June 10 2014 Urban Agriculture Public Meeting No 2 Participants Written Comments and Questions
- E – July 23 2014 Urban Agriculture Public Meeting No.3 (Spanish only) Participants' Written Comments and Questions

Proposed Changes to the Urban Agriculture Proposal

Note: The issues cited below were expressed at the urban agriculture public meetings and in written and verbal communications to staff.

Keeping the Small Farm Animals – Maximum Number Permitted

1. **Issue:** The fixed number approach (i.e. 8 fowl, plus 3 of another type of small farm animal) is too inflexible and does not make adjustments for lots of different sizes.

Proposed Change to Address Issue: Revert the method of calculating the maximum number of animals permitted to the Animal Unit system. Note: the Animal Unit system allows 2 Animal Units per 1,000 square feet of lot area. Each type of animal is assigned a numerical value based on its size and waste production. For example, a chicken has an Animal Unit of 1, while a miniature goat is 5. Residents on a 7,000 square foot lot could keep: 1) 14 chickens; 2) 2 goats; 3) 2 chickens and 2 goats; or, 4) some other combination of animals provided 14 animal units is not exceeded. Caps would be in place to limit the number of animals on larger lots.

Rationale: A) The Animal Unit approach is a more nuanced approach to determining the maximum number of animals permitted, which takes into account the type of animal(s) being kept and the lot size; B) Numerous stakeholders have communicated to staff that they prefer the Animal Unit approach.

Section(s) Affected by the Proposed Change: proposed Sec. 6.6.5.F.5

2. **Issue:** The previously proposed Animal Unit approach assigned values to each permitted animal using decimal fractions (e.g. 0.1 points for chickens and 0.5 points for goats), which were confusing and more difficult to use when calculating the maximum number of small farm animals permitted.

Proposed Change to Address Issue: Change the Animal Unit approach to whole numbers (e.g. 1 point for chickens and 5 points for goats).

Rationale: The whole number approach is more straight-forward and easily understood by more people.

Section(s) Affected by the Proposed Change: proposed Sec. 6.6.5.F.5

3. **Issue:** Conformance with the maximum permitted number of rabbits and rodents (i.e. 3) is unfeasible given the high rate these animals reproduce.

Proposed Change to Address the Issue: Do not restrict the number of rabbits and rodents permitted. Apply the maximum number limit to fowl, goats, and similar other hooved animals only.

Rationale: A) The proposal focuses the attention on those animals that are generally perceived as requiring more nuisance mitigation; B) A rabbit breeder informed staff that the number of rabbits fluctuates considerably due to the reproduction/mortality rate; and, C) Rodents are generally kept inside and don't create a nuisance to surrounding property owners.

Section(s) Affected by the Proposed Change: proposed Sec. 6.6.5.F.5

4. **Issue:** The proposed limits on the number of chickens is more restrictive than what is currently allowed (i.e. 24 chickens; the shelter must be at least 50' from every property line).

Proposed Change to Address the Issue: Apply the Animal Unit approach to shelters within 50' of any property line adjacent to a residential use or zone. Allow the number of animals currently allowed to apply when the animal shelter is at least 50' from any property line adjacent to a residential use or zone.

Rationale: The current proposal is more restrictive than current code, which is contrary to one of the project's goal to facilitate and encourage urban agriculture.

Section(s) Affected by the Proposed Change: proposed Sec. 6.6.5.F.5 & .6

5. **Issue:** The proposal is not clear whether a "run" associated with the keeping of small farm animals must meet the proposed setback requirements.

Proposed Change to Address the Issue: Clarify that: 1) the small farm animals may run freely in the backyard provided the yard is enclosed by a fence or wall and there is a shelter; and, 2) if the conditions of #1 are met, then a "run" is not required to meet the same setback requirements as the shelter. If the conditions of #1 are not met, then the run must be enclosed, but it does not have to meet the same setback requirements as the shelter.

Rationale: The proposed change resolves a misunderstanding expressed by several people raised at the community meetings.

Section(s) Affected by the Proposed Change: 11.4.2 (Definitions – A)

6. **Issue:** Goats are social animals and need the companionship of at least one other goat for their well-being. The proposal does not recommend or require that there be at least two goats when goats are being kept.

Proposed Change to Address the Issue: Recommend that a minimum of two goats be kept.

Rationale: The proposed guideline better ensures a goat's well-being.

Section(s) Affected by the Proposed Change: proposed Sec. 6.6.5.F.5

7. **Issue:** The Design Development Option (DDO) is the inappropriate procedure to consider requests to increase the permitted number of small farm animals.

Proposed Change to Address the Issue: Revise the proposal to not allow modifications to the number of permitted small farm animals via the DDO. Under the proposed change, modifications would be processed as a variance requiring consideration by the Board of Adjustment.

Rationale: The DDO has historically been used for minor setback and wall height modifications. Allowing the modifications to the number of animals permitted via the DDO is inconsistent with how DDO's have historically been used.

Section(s) Affected by the Proposed Change: No change to current regulations is required. The draft proposal will be revised to remove modifications to the number of small farm animals from the DDO's applicability.

Community Garden

1. **Issue:** A) The current proposal does not take into account community gardens for multi-family and co-housing developments; B) The number of small farm animals permitted at community gardens and associated with multifamily and co-housing projects is too restrictive.

Proposed Change to Address the Issue: A) Revise definition of the Community Garden use to include gardens at in the common space of a subdivision or multifamily development that is used by homeowners and/or renters or similar other development types, such as co-housing; and, B) The Animal Unit approach is used to determine the maximum number of animals permitted and is based on the square footage of the garden itself. Multifamily and co-housing projects may seek modifications to the number of permitted animals in accordance with the PDSD Special Exception Procedure.

Rationale: The proposed change makes reasonable accommodations for multifamily and co-housing projects.

Section(s) Affected by the Proposed Change: proposed Sec. 6.6.5.A & 6.6.5.F.5

Urban Agriculture in the Rural and Suburban Zones

1. **Issue:** Introducing the proposed Urban Farm use in the Rural and Suburban zones creates confusion and the potential for conflicting regulations with the Animal Production and General Farming uses currently permitted in these zones.

Proposed Change to Address the Issue: Remove the proposed Urban Farm use from the RH, SR, SH, and RX-1 zones.

Rationale: The proposed change removes any potential conflict between these uses in the Rural and Suburban zones.

Section(s) Affected by the Proposed Change: No change to current regulations is required. The draft proposal will be revised to remove the proposed Urban Farm use from the RH, SR, SH, and RX-1 zones.

Farmers' Markets

1. **Issue:** The proposed Farmers' Market standards are more restrictive in the commercial and industrial zones than a similar use – Food and Beverage Sales – currently permitted.

Proposed Change to Address the Issue: Reclassify the proposed Farmers' Market use as a subtype of the Food and Beverage Sales use rather than the Swap Meet and Auction use and update the proposal to reflect this change without making any fundamental changes, i.e. allow farmer's

markets as an accessory use to Agricultural, Civic, and Recreation uses only in the residential and office zones, allow in the commercial and industrial zones as an accessory and/or principal use, and maintain the use-specific standards.

Rationale: Farmers' markets are more similar to the Food and Beverage Sales since the sale of produce and other food-related items is the primary purpose.

Section(s) Affected by the Proposed Change: Sec. 4.8 (Use Tables), 11.3 (Definitions of Land Use Groups, Classes, and Types), and proposed Sec. 6.6.5.C.

2. **Issue:** The proposed limit on a farmers' market's hours of operation from 7 a.m. to 5 p.m. in residential zones does not accommodate people shopping after work, nor, does it consider the optimal time to operate the market due to seasonal temperature changes.

Proposed Change to Address the Issue: Revise the proposal to state: "A Farmers' Market in a residential zone shall not be operated more than six hours per day between sunrise and sunset."

Rationale: The proposed change offers the flexibility necessary to address the issues.

Section(s) Affected by the Proposed Change: Proposed Sec. 6.6.5.C.

Other

1. **Issue:** Allowing urban agriculture activities in the Open Space (OS) zone is counter to the purpose of the zone, which is to designate both public and private open space resources in order to, among other reasons, preserve significant natural resources and open spaces.

Proposed Change to Address the Issue: Keep the uses currently uses permitted in OS zone as is, i.e. don't allow the proposed urban agricultural uses in the OS zones.

Rationale: The proposed change is consistent with the OS purpose.

Section(s) Affected by the Proposed Change: No change to current regulations is required. The draft proposal will be revised to remove the proposed urban agricultural uses from the OS zone.

2. **Issue:** The proposed standards adversely affect the ability of non-profit urban agricultural-related organizations, such as the 4-H Club and the Future Farmers of America (FFA), to operate.

Proposed Change to Address the Issue: Exempt non-profit urban agricultural-related organizations from the permitted number of small farm animals provided the setback and other nuisance mitigation standards are met.

Rationale: The 4-H and FFA are agricultural education programs typically located in rural or suburban areas. Maintaining the nuisance mitigation standards will ensure that these uses do not negatively affect nearby residences.

Section(s) Affected by the Proposed Change: proposed Sec. 6.6.5.F.5

3. **Issue:** The urban agriculture policies in PlanTucson encourage gleaning; however, the proposed standards do not include any mention of gleaning. Note: gleaning is the act of gathering grain or the like after the reapers or regular gatherers.

Proposed Change to Address the Issue: Add "gleaning" as a permitted activity in the urban agriculture definition. Provide a definition of gleaning.

Rationale: Gleaning allows one way to ensure that produce is not wasted.

Section(s) Affected by the Proposed Change: Sec. 11.4.8 (Definition – G) & .22 (Definition – U)

Urban Agriculture Comparison Table: Current vs. Proposed Regulations

	<u>Current Regulations</u>	<u>Proposed Regulations</u>
	Use	
Community Gardens	The UDC does not mention community gardens specifically. The closest comparable use is Crop Production, which is permitted in the rural, suburban, and urban residential zones. The community gardens in the City today have been result of a determination by the City’s Zoning Administrator.	Permits in all zones as a principal or accessory use
Farmers’ Market	<p>Subtype of the Swap Meet and Auctions use</p> <p><u>Residential zones:</u> permitted as an accessory use only</p> <p><u>Office zones:</u> permitted as an accessory use only</p> <p><u>C-2, C-3, and I-2 zones:</u> permitted as a principal or accessory use</p> <p><u>OCR-1 & -2, P-I, and I-1:</u> principal use allowed as a special exception. Permitted as an accessory use.</p>	<p>Subtype of the Food and Beverage Sales</p> <p><u>Residential zones:</u> allows as an accessory use to an Agricultural (e.g. urban farm), Civic (e.g. church or school), or Recreational (e.g. park) use only through a special exception procedure. Can operate no more than 2 days/week and no more than 6 hours between sunrise and sunset.</p> <p><u>Office zones:</u> permits as an accessory use only</p> <p><u>Commercial, Mixed Use, and Industrial zones:</u> Permits as a principal or accessory use</p>
Urban Farms	<p>The UDC does not mention urban farms specifically. The closest comparable use are the Crop Production and General Farming uses.</p> <p><u>Rural and Suburban Residential zones:</u> Crop Production is permitted in both land use groups. General Farming is permitted in certain rural and suburban zones.</p> <p><u>Urban Residential zones:</u> Crop Production is permitted.</p>	<p>Establishes the Urban Farm use</p> <p><u>Rural and Suburban zones:</u> Crop Production and General Farming remain as is. Urban Farm not applicable in these zones.</p> <p><u>Urban Residential zones:</u> allows as a special exception in urban residential and certain special use zones subject to</p>

Current Regulations

Proposed Regulations

Office, commercial, industrial, and certain special use zones: Not permitted

Office, commercial, industrial, and certain special use zones: permits subject to same mitigation standards provided above.

Home Occupation: General Farming is permitted as a home occupation in C-3 zone

Home Occupation: Permits in all zones which permit family dwellings or mobile home dwellings.

Accessory Uses

Composting	Not mentioned specifically in the UDC. Permitted subject to the accessory use standards in Section 6.6.	Permits subject to mitigation standards pertaining to rat and other vector control, surface water, and setbacks.
Gardens	Not mentioned specifically in the UDC. Permitted subject to the accessory use standards in Section 6.6.	Permits
	Not clear whether gardens are permitted in front yards	Clarifies that gardens in front yards are permitted
	Not clear whether vertical gardens on walls and fences are permitted	Allows vertical gardens mounted on a perimeter wall or fence.
Greenhouses	Permitted subject to the accessory use standards in Section 6.6, except as follows.	Permitted subject to the accessory use standards in Section 6.6.
	Unclear whether they would be permitted as part of community gardens and urban farms since there are accessory use prohibitions against “substantially altering the exterior appearance of the principal use or building” and locating an accessory use in the front yard.	Clarifies that greenhouses would be permitted at community gardens and urban farm.
Keeping of Small Farm Animals (does not include dogs, cats, pigs, and large farm animals)	Animal cruelty and neglect prohibited <u>Type of animals permitted:</u> UDC is silent. Tucson Code only permits fowl specifically. <u>Type prohibited:</u> Male fowl	Animal cruelty and neglect prohibited <u>Type of animals permitted:</u> Miniature goats, rabbits, rodents, fowl, and other similar animals <u>Type prohibited:</u> Male fowl and uncastrated miniature goats over 5 months

Current Regulations

Type of use permitted: Not specified.

Number permitted: Only specifies a maximum of 24 fowl

Shelter setback requirement: UDC requires at least 50' from all property lines, except corrals which must be at least 10' from all property lines. Tucson Code requires at least 20 feet from adjacent residences. The UDC requirement prevails since it is the more restrictive.

Exception to setback requirement: Setbacks do not apply to buildings of 5' or less in height and 10 square feet or less in area, such as doghouses. However, it is not specified whether this applies to animal shelters other than for dogs. Code enforcement has been citing residents for chicken coops that are within 50 feet of their property lines.

On-site sale of products grown on-site

Residential zones: Permitted to no more than four times in a calendar year.

Nonresidential zones: Permitted subject to a seasonal permit (typically used for pumpkin and Christmas tree sales) or a temporary diversion of parking permit.

Proposed Regulations

Type of use permitted: Permits as an accessory use to residential uses, community gardens, and urban farms.

Number permitted: Bases number of fowl and miniature goats on the Animal Unit system, which factors the type of animal and the lot size into consideration. For example, a 7,000 sf lot can have 14 chickens, 2 miniature goats, or a combination of animals provided the maximum Animal Unit is not exceeded.

Shelter setback requirement: Must be set back from the property line per the underlying zone and at least 20 ft from the adjacent residence.

Exception to setback requirement: Shelters that are 6 ft. or less in height, 16 sq. ft. or less in area, screened, and at least 20 ft from adjacent residence do not have to setback from the property line.

Residential zones: Permits to no more than 4 advertised events per year. Each event cannot be more than 3 consecutive days. Limits to 7 am to 5 pm.

Nonresidential zones: Permits. A seasonal permit or temporary diversion of parking is not required

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / May 13, 2014
City of Tucson

The following written comments were received from participants at the May 13, 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.

COMMUNITY GARDENS

- Community Gardens have been shown to increase property values.
- Vacant lots are associated with more crime and converting them to community gardens enhances community socialization and decreasing crime.
- Community Gardens will improve food security and diets of families and more importantly children. This will improve the health of Tucsonans and decrease our obesity epidemic and health care costs.
- Community gardens are an important way to increase fresh food in areas with limited ability to have gardens in their yard, especially low income areas.
- Community gardens are an important way to increase fresh food in areas with limited ability to have gardens in their yard, especially low income areas.
- I also have a neighbor that has a front yard garden. There have not been any problems.
- Regarding non-commercial community gardens that must pay their own water bills: even if Tucson Water controls pricing, which is a bundled fee/rate, (no matter that community gardens don't use sewage.) Can they City either through these amendments or some other way, lessen the financial burden of water bills?
- Will there be any size parameters for community gardens?
- Will there be an accommodation for water costs for community gardens?
- Will a community garden be eligible for commercial water rates? Residential rates are too punitive.
- What are the regulations / restrictions on community garden produce sales to the public – neighbors?
- How will gardens/farms intended for teaching purposes be affected? It seems like these spaces would fall between "residential" and "commercial" applications as they require a larger scale operation than home gardens but do not sell for profit? A 4xyear

PARTICIPANTS' WRITTEN COMMENTS
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FARMERS' MARKETS

- Satisfying everyone is impossible but making things easier would go a long way toward food security. We are a country of life, liberty and the pursuit of happiness; let's keep it that way!
- Sales: My concerns about the current recommendations:
 - the 7 am - 5 pm hours of operation for farmers' markets or neighborhood sales seems restrictive given that most people work during those hours.
 - *[Note: Moved second concern under "Small Farm Animals"]*
- The expansion of farmers' markets supports local growers, the local economy and increases the availability of locally grown fresh food. You can't have too many!
- Farmers' markets are valuable for many reasons - especially social. [They] allow for gatherings that include activities for all ages to enhance sense of community.
- I am worried that the proposed market regulations will negatively impact markets without a strong community justification. For instance, one market in particular requires vendors to be food-related or sell items made from organic ingredients, so this includes soap and lotion. I think this and other markets would be hard-pressed to actually host 8 out of 10 produce booths. Customers have come to expect a variety of items and they ask for all of these vendors. The soap and produce vendors, for example, complement each other in a market setting, especially in Tucson where the farmers' market culture has developed organically. Allowing a market like the one I mentioned here to have 30-50% non-produce vendors at a farmers' market, especially when it would be difficult to replace them with available and regularly appearing gardeners and farmers, makes it possible for directors to run their markets realistically and does not harm the community.
- I believe the revisions posit regulating hours of operation for farmers' markets from 7 am - 5 pm. This is more restrictive than current hours, and people who work jobs during that time should be able to visit a farmers' market later during the day. If the code is addressing concerns over equitable access to fresh, locally grown food, why restrict farmer's market hours thusly?

SMALL FARM ANIMALS

- I live off of Speedway and Craycroft and I have chickens as neighbors. They have been no problem at all. They are not loud, they do not smell, and they have not attracted predators. I support my neighbor's right to feed their families healthy food. I do not have the right to tell my neighbors what kind of animals they can have, and I think it's over controlling for anyone to do so. Let's support those who want to live a healthy lifestyle, and stop preventing them from doing so. PS. I do not keep chickens.

PARTICIPANTS' WRITTEN COMMENTS
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Small Farm Animals *continued*

- Although I would prefer to see more than 8 [chickens] allowed, I appreciate the compromise and would prefer to trade the lower # for more protection from vindictive neighbors. Thank you for the hard work and effort.
- Keep the number of chickens to 24!
- More than 8 chickens please
- 8 chickens are not enough! A few will die readily. Increase the limit to 12, or go ahead and publish a formula.
- Does the limit of 8 chickens per house prevent the owner from also having a turkey or quail?
- The limit of 8 chickens is too few: 12 – 15 seems reasonable.
- Limitation of 8 chickens seems small to me. 12 would be a better number.
- Number of animals - e.g., 8 chickens – should be per number of sq. ft.
- The reduction in fowl numbers allowed also seems restrictive. It seems that more consultation should take place on this with community members involved in animal husbandry.
- 8 domestic fowls are going to hamper a family's ability to have enough food. The average chicken produces 240 - 260 eggs per year. Now the family butchers 3 of these chickens. It will take 20 - 22 weeks for a replacement pullet to replace the egg laying ability of the hen butchered. Apache Junction this past week that is more reasonable and says 2 chickens for every so many feet, I believe it's 2000 or 5000 sq. ft.
- Limiting a home flock to 8 is unnecessarily restrictive - at many times of the year 8 chickens wouldn't be laying enough eggs to even supply a small family. 24 hens limit has been very reasonable and should be continued.
- Re: The poultry distance limit from another house - Should be referring to the main house, not studios, guest homes, back lot rentals, etc. The intent should be to make it easier to keep backyard poultry, not make it more difficult.
- Even 8 chickens can be kept inhumanely in a coop, and I would prefer to see more chickens allowed with minimum space requirements.
- Cual es la & espuerta a la limitacion a-tener solamente 8 gallianas por casa y que hacer para aumentar el limite a 12. *English translation: What is the answer to the limitation of having only 8 chickens/dwelling and what can be done to increase the limitation?*
- Generous allowances should be made for small farm animals and chickens. Many reasons support this – environmental, economics, health, and social.

PARTICIPANTS' WRITTEN COMMENTS
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Small Farm Animals *continued*

- *Required Setbacks:* Currently the setback for an animal shelter, coop in particular, is 20 ft. from the property line and 50 ft. from the neighboring house. I believe that setbacks of this amount are a barrier to growing one's own food. If the property line has an existing cement block wall, there should be the ability to use the wall as one side of the structure and no property setbacks. If there is no permanent fence structure I would be supportive of an increased setbacks of the proposed 6 ft. with the addition of a "screen" if completely open access. I don't believe the 50 ft. setback is realistic at all in small city properties
- Is the 50 ft. from property line for chicken coops going to be changed? I have a regular size lot and an established garden on part of my yard and only have room along my property line.
- How are you addressing corner lots?
- Re: The poultry distance limit from another house, should be referring to the main house, not studios, guest houses, back lot rentals, etc. The intent should be to make it easier to keep backyard poultry, not make it more difficult.
- Will someone's particular zoning dictate the number of animals as it does now?
- Generous allowances should be made for small farm animals and chickens. Many reasons support this - environmental, economics, health and social.
- Will current people's chickens be grandfathered in, or will they be made to reduce their numbers?
- Dropping the nuanced version of how many animals are allowed seems to be a mistake. Lot sizes make a difference. If the goal of this process is to more accurately address issues of zoning, ignoring lot size loses that accuracy.
- I think the placing of a coop should be reconsidered so it is not 50 ft. from the line.
- Can the chicken run go to the property line if the coop is away from the line?
- Require full enclosure of domestic fowl for their protection. No permits should be required for coops.
- Is the coop the place where chickens primarily reside or does it include the adjacent pen where we let them roam when we're home?
- In an effort to have very happy and healthy 3 chickens, I let them free range the entire yard, and they sleep most safely from neighborhood dogs in a very tall tree. All adjacent neighbors have chickens as well! Would this be allowed?
- A dog barks at 100 dBA and hen squawks at only 65 dBA

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / May 13, 2014
City of Tucson

Small Farm Animals *continued*

- You can't use commercial studies or studies from Asia to measure any negative effects of chickens in backyards in Tucson home.
- Having chickens is not different than having other pets.
- Could you tag chickens the same way we tag dogs? The comment tonight that dogs and cats are regulated (implying they are successfully regulated and not a nuisance) begs the question. And anyone who lives here knows cats are a nuisance.
- Small animals provide psychological benefits to owners, food security, economic security, environmental benefits with less food waste going to sewer and landfills, and less pests as chickens eat them.
- What resources were used to create the standards and regulations and evidence that more animals are of a public health or social problem?
- There is a concern about chickens raised with insufficient room (minimum area per animal?), and what to do when they become old and unproductive - slaughter standards.
- If you sell eggs does it have to go through the health department?
- My question or concern is about roosters if the chicken coops are allowed and the people/citizens start raising their own for eggs etc. Knowing some will be born roosters. How long of a time will they have to get rid of them (roosters)? I do NOT wish for the rooster laws to change!! They crow all day and the people don't care. I have had to call the police half a dozen times in the past years to get rid of them. Will their upkeep be monitored at all?
- Are roosters allowed outside of city limits?
- Rooster concern. Do not want them in City limits.
- Will roosters ever be allowed within city limits? - meat production would be difficult without them.
- What are the regulations regarding dwarf dairy goats?
- If someone has a very large urban lot, why shouldn't they be allowed to have a full size goat?
- Some sheep are smaller breeds and there should be inclusion just as there is for "dwarf/miniature" goats.
- I think if I want to support my family and this form of support creates happiness. Then why regulate my constitutional right in my pursuit of happiness?
- If my residentially-zoned single lot is multi-acre, is there a process to seek allowance for greater numbers of small farm animals?

PARTICIPANTS' WRITTEN COMMENTS
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Small Farm Animals *continued*

- What animals are considered "fowl" in the proposed ordinance? Chickens, ducks, turkeys, quail
- What health concerns were taken into account when considering small animals? (ie) waste, flies, mosquitoes, SARS, Bird Flu, West Nile Virus, smell
- How will you enforce the new standard since the current code is violated - i.e. dog owners don't clean up after their animals, people have chickens now in violation of code.

URBAN FARMS

- I want to build a large ferret cage, what are the setback requirements?
- I want to breed rabbits; how far away from my property line must I locate the structure?
- Urban farms should be allowed/encouraged.
- Rainwater harvesting to support the agriculture needs to be subsidized.
- Many dwellers in the county - notable in wildcat development - state restrictions on agriculture as a reason for leaving the city. I would recommend doing outreach w/the county and county dwellers (notably Summit Neighborhood) as part of this work. Additionally, "urban agriculture" is not a new concept, please network with the area's native communities for advice on how to live off the land sustainably & make sure regulations aren't arbitrary.
- Problem - Homeowner wants to have more animals on lot than allowed and/or wants to have farm sales on weekends in excess of 4/year. Solution- A variance is suggested under a DDO process. Problem- Urban Ag has a small profit margin plus DDO cost hundreds of dollars = People choosing to break these rules to create a viable livelihood.
- Are these regulations only for permanent structures? If the greenhouse is designed to be used for season extension only & will be taken down (during peak season when food is in ground) does it fall within these restrictions?
- I am so grateful to the small farmers within our city limits who are trying to earn a living growing fresh produce for our community. They deserve our praise, support and less restrictions on their livelihoods. We need many more of them
- **Please ensure a viable path from amateur →professional. There should be no obstacles between a high school student (ie) growing a large garden who then graduates and moves towards a consistent commercial basis of selling to neighbors, farmers markets, etc. **Yes! enable the home occupation of urban farmer! As many of us are losing our jobs in this economy, we need something human to fall back on!

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / May 13, 2014
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Urban Farms *continued*

- One of the true gems of our central city is the University of Arizona's Campus Agricultural Center on North Campbell Avenue at Allen Rd. This farm is well-established and a terrific oasis - it is an ideal example of the benefits of an urban farm in an urban area.
- Referring to farming in the front garden, are there restrictions on structures such as screens, wire & shades?
- Our large property/garden is adjacent to a city well that is operable but not actively being used to serve the public. It is maintained and flushed 2 times per year. Can we gain access to this well to use for the garden?
- Will the city expand access to recycled/effluent water? -- i.e., build more distribution.
- How is a greenhouse defined? Does an open caged raised bed with summer white shade cloth fit this definition? 11' tall at highest point

OTHER

- *Zoning Concerns:* There are large parcels west of the freeway along Cottonwood, Silver Lake, La Cholla that consist of 2.5 acres or greater that have horses, sheep and goats zoned R1 not RH or SR. The city should look at rezoning those areas.\
- *Food Distribution:* Loading zones are restricted to "commercial or government plates." Small farms often use passenger vehicles for restaurant deliveries & deserve space. 7 day "Hubs" would facilitate distribution. Please keep regulations minimal.
- *Growing Own Produce:* I really value being able to grow my own veggies and eggs and purchase other garden products from my neighbors. This is a major source of food for my family.
- *Eating Fresh:* Front yard gardens, back yard gardens, why can't the city promote the eating of fresh foods you grow? Discussion about low income, urban folks living in a food desert can be offensive because you don't have to be poor to understand fresh food tastes good. Why can't the city favor more gardens?
- *Pursuit of Happiness:* I think if I want to support my family and this form of support creates happiness. Then why regulate my constitutional right in my pursuit of happiness?
- *Composting:* If managed properly, compost should have no smell and have no consequence to adjacent neighbors. Compost piles should have no setback requirements.
- *Compost:* How will compost & materials used for gardens be controlled - i.e. left in alley? If well cared for, not a problem.

PARTICIPANTS' WRITTEN COMMENTS
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Other continued

- Would they be willing to allow a neighborhood compost (maybe isolated....)?
- *Composting Toilets:* How will composting toilets be regulated? Do they fall under the sustainable goals? It seems they should, especially given drought, and it should be made easier to install them, not more difficult.
- *Home-composting System:* If a backyard cannot maintain a home-composting system due to codes on distance from property lines, smell, or neighbors' discontent, what can the City do for these people who generate so much kitchen/yard waste?\
- *HOA's & CCR's:* Since HOA's & CCR's supersede the proposed plan, can we start an HOA or CCR to allow large farm animals or more small farm animals than proposed?
- *Wildlife in Urban Areas:* Coyotes have been dining on cats in my neighborhood for years. I think they would prefer a poor unfortunate cat over cucumbers & tomatoes being grown in the front yard...Just sayin' ... Could you send your coyotes to my _____?
- *Large Animals:* Some people have been concerned that they will lose their large animals if these changes pass. I want to make sure folks that keep large animals will be grandfathered in.
- *Venomous Animals:* Could further clarify be provided regarding raising/using venomous animals (i.e., honey bees) for production or crop pollination?
- *Public Health:* Have you considered whether people may pursue capturing storm run-off to water their plants? With freedom to grow and sell produce comes responsibility to make sure produce is free of heavy metal contaminates. Are you considering how mosquitos & other arthropods may promulgate disease because of standing water and irrigation? is this something that should be, could be, already is addressed?
- *Water Harvesting:* Can the water harvesting tank be situated within 6 feet of the property line?
- *Green House, Chicken Coop:* For large lots (2 acres+) w/neighbors >200' away, can more generous/expensive facilities, more chickens, etc. be allowed?
- *Gleaning:* Re: Urban Agriculture definition is gleaning of edible trees included in the definition?
- Gleaning?
- *Urban Ag Definition:* Please consider adding gleaning to this definition of urban ag as it exists in Plan Tucson
- *Definitions:* What are the working definitions?

PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / May 13, 2014
City of Tucson

Other continued

- *Community Meat Processing Facility:* With the restrictions on processing animals for meat, are there any provisions to support a community based meat processing facility to help small scale procedures meet the requirement?
- *Funding Sources:* What are the funding sources for Plan of Tucson? You mentioned that some of your funding comes from Department of Energy. Does any of your funding come from the UN or ICCLI?
- *Presentation:* Great job Adam. You spoke very elegantly. I appreciate your hard work.
- *Effort:* Thanks! I applaud your efforts!
- *Mentoring:* How can those of us who have urban ag help those who are now into it or those who are thinking of giving it a try? I suggest an ambassadors program.
- *Involvement in Conversation:* I am president of Northwest Neighborhood and we support urban agriculture and have many examples of urban ag practitioners in our neighborhood. How can we be involved in the more detail oriented planning conversations?
- *Community Outreach:* What type of outreach are you doing to be inclusive of the underserved community? I noticed that the translator left, meaning a large majority of the folks who already practice food production and small animal husbandry aren't receiving this information. (Spanish speaking / South Tucson)
- *Clarification/Publicity:* I think much of the community is unaware of current zoning, sustainability and urban agriculture policies (let alone any proposed changes). However, this issue is likely to influence many Tucsonans outside of those of us actively involved in the food movement. What is being done to make sure those affected are informed of community forums and educational sessions?
- *Regulation Approval Process:* Can you share more about the process to approve the new zoning regulations. Examples: Input process, when will it go up for vote? How many meetings are expect, timeline.

ATTACHMENT D
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.

ATTACHMENT D
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 goals 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.

ATTACHMENT D
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- Change definitions so small farm animals exclude fowl and have standard for fowl separately.
- 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.

ATTACHMENT D
PARTICIPANTS' WRITTEN COMMENTS
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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.
- 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.

ATTACHMENT D
PARTICIPANTS' WRITTEN COMMENTS
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- 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.
- 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,

ATTACHMENT D
PARTICIPANTS' WRITTEN COMMENTS
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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?
- 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.

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- 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.
- 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.)

ATTACHMENT E
PARTICIPANTS' WRITTEN COMMENTS
Urban Agriculture Public Meeting / July 23, 2014
City of Tucson

The following written comments and questions were received from participants at the July 23, 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

- Si varios vecinos tienen animales en mi vecindario y huertas y nadie se queja podríamos recolectar firmas de todos. Los vecinos para poder tener como prueba para la ciudad que todos estamos de acuerdo en tener animales. Espero me puedan responder en la próxima Junta.

[Staff English translation: If several neighbors have animals in my neighborhood and gardens and nobody complains, can we gather signatures from the neighbors to give to the City that they have no problems with the animals and that the noise isn't a bother. Waiting for a response at the next meeting.]

- Animals on private property that are properly maintained must be left AS IS!

URBAN FARMS

- Why the City of Tucson wants to control our own sources of food by limiting us with the production of our own food? Who is going to be benefitted with all this regulations or restriction? Thanks.
- What can the city do to encourage households to grow their own food in backyard gardens? I suggest allowing urban farmers to register their gardens in return for a concrete benefit such as "free water" in June because July is traditionally the highest revenue month of the year. The free water in June would be negligible in considering the cost of growing your own food.

FARMERS' MARKETS

- Cut off at 5 pm for market is not appropriate, that's when the sun begins to cool.
- El tianguis is different than a farmers market. Our people have engaged in transactions for over one thousands in the Americas

COMMUNITY GARDENS

[None of the comments received appeared to be specifically about "community gardens."]

ATTACHMENT E
PARTICIPANTS' WRITTEN COMMENTS
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OTHER

- Free-market capitalism means free-market, anytime and anyplace. Stop regulating the market. It's unpatriotic.
- Tucson's lifeline was and is still agriculture. There are ranches in Tucson where people still proudly celebrate their heritage and cultural and traditional ties with Mother Earth and each other. These people are multicultural and insist in continuing to exercise their lifestyle and innate rights to live freely and enjoy a fulfilling quality of life. In particular, the South West side of Tucson where our barrios are.
- Consider creating a manure/compost market (rather than legislating animals by output) -> it's a resource that results.
- Focus on public health; food deserts and ability to create sustainable communities -> consider large families/ community networks, affordability, etc.
- Try to avoid language that replicates the right-wing immigration discourse of coyotes and disease.
- When considering lot size, consider land devoted to structures / house and not only lot itself – average home size varies greatly by neighborhood when lot size is similar.