

Update from the Klinger Lake Association Board of Directors regarding a planned Hog Farm operation on Shimmel Road. Here are some facts:

- In the summer of 2017, Sturgis Farms LLC developed a proposal for a Concentrated Animal Feeding Operation to 'grow to finish' 10,000 hogs in 4 completely enclosed barns on a site near 66730 Shimmel Road, Sturgis, MI 49091. The barns would be located on the west side of Shimmel Road. The original CAFO request was filed on September 12, 2017.
- Utilizing the accepted, legal practices of the Michigan Department of Environmental Quality, Sturgis Farms developed a Comprehensive Nutrient Management Program for the site as well as details showing where the manure will be injected, posted it for public review per the legal process, received no public questions or protests and received a Certificate of Coverage from MDEQ dated 11/14/17. After this approval was issued, there was a 60 day protest period, which expired on 1/13/18. Public Notices for the MDEQ are only required to be posted on the MDEQ's MIWaters website. We are currently attempting to determine how many people (or how few) subscribe to the site and reviewed the specific document.
- On 1/13/18, under the Michigan Right to Farm Act process, landowners within ½ mile of the proposed site were provided notice of the plan to develop the Hog Farm operation. Just by chance, one of the neighboring landowners contacted Edgar Reihl (KLA Board Member) and we began investigating. This Hog Farm site is undergoing review by the Michigan Department of Agriculture and Rural Development. Their review period lasts until about February 15, 2018. The MDARD process does not accommodate public hearings or feedback until after they complete their review process, but they do allow feedback after they issue their opinion on the matter. This appeal process lasts for 45 days, so in this situation the time for an appeal to MDARD will be approximately from 2/15/18 until 4/1/18. We will not be directly notified of the 'Site Suitability' rating granted by MDARD. They will inform the applicant, the consulting engineer, and the clerks of St Joseph County and Sherman Township. We have confirmed with Lindsay Oswald (St Joe County Clerk) that she will contact us when the MDARD ruling is finalized.
- The basis for any appeal would be non-compliance with any of the requirements of Generally Accepted Agricultural and Management Practices (GAAMPs). The document, which is available for review via the web, provides information on siting requirements and odor control for new and expanding livestock facilities.
http://www.michigan.gov/documents/mdard/SITE_SELECTION_GAAMPs_550741_7.pdf
- The Hog Farm operation is governed by MDEQ regulations under the National Pollution Discharge Elimination System as well as other regulations to prevent contamination of ground waters and well heads. The farm operator is subject to ongoing inspections of their operation and are subject to fines and even being shut down for non-compliance. This operation has been approved by the MDEQ.
- We have utilized the MIWaters web site to find all grow to finish Hog Farms, both operating and proposed, in St Joseph County. According to our calculations, across the county, there are in place operations housing 34,000 hogs and plans for operations housing an additional 15,000.

- The genesis for much of this new activity appears to be the opening of the Clemens Food Group Coldwater, MI pork processing facility. Information about this can be found at <http://www.cfgcoldwater.com/>. Per their website, they will process 10,000 hogs per day. Doing quick math, this means they need 2.5 million grown hogs each year if they run a 5 day per week operation and have a single 2 week shutdown each year. Assuming each group of hogs spends 6 months in the grow to finish operation, the existing and planned St Joseph County farms could provide 98,000 hogs each year. Based on this, Clemens needs a whole lot more of these grow to finish operations. (A reminder: not every hog needed by Clemens will be sourced in St Joseph County or even in Michigan. This will involve multiple nearby states.)
- A specific action that the KLA Board has taken is to form a subcommittee of the Board to monitor the MDEQ site(s) regularly to discover proposed new nearby CAFOs early in the process. This would enable open, public discussion of the impact of planned operations before they are approved. After the subcommittee has developed an easy-to-follow process, we will document the method, allowing anyone to use the MDEQ website(s) to learn about planned CAFOs. Further, the subcommittee will create the outline of an action plan – step by step – that would be used to communicate and educate our members should we learn of a proposed CAFO in the immediate Klinger Lake area.

Here is what the KLA Board is doing about the proposed hog farm:

- **We have met multiple times recently to discuss the situation and consider alternatives**
- **Using web resources, personal contacts and countless phone calls, we have educated ourselves on the CAFO approval process, both from the MDEQ and from MDARD.**
- **We have discussed this situation with multiple legal firms experienced in various aspects of environmental law, to better understand the likelihood of making changes through legal action. While many attempts have been made to stop other CAFOs, it appears that most such efforts have not been successful in stopping these farms. Possibly we should focus on vigorously monitoring water and air quality and be prepared to immediately engage the proper authorities should any operations violations occur.**
- **Early this spring, the Klinger Lake Association will work with neighboring landowners to establish a water sampling protocol to collect and monitor water samples from 1) Thompson Lake at/near the outlet to Sherman Mills Creek 2) from Goose Pond 3) from Tamarack Lake at/near the outlet to Sherman Mills Creek 4) and from Klinger Lake in our normal 'deep basin' sampling location. The results will be used as a baseline to confirm the status of our lake waters before the CAFO begins operation**
- **Water monitoring will continue on a regular basis and analysis will be focused on components traceable to runoff from hog farming operations. Should any such components be discovered in future, MDEQ and MDARD will be immediately notified to inspect the CAFO and take urgent remedial action as appropriate.**
- **Discussions are underway with the KLA legal counsel to assess alternatives and support contracts for retention of environmental technical expertise, should such be required.**

We have spent a lot of time researching the situation and exploring what can be done to assure that if the Sturgis Farms Hog Farm is built as proposed, it is done in such a way that will not threaten the beautiful environment we all enjoy at Klinger Lake. Having stated this, many of us – as individual land owners and concerned citizens - have contacted a broad variety of government officials and representatives questioning the process that was followed in this case and educating ourselves on CAFOs, GAAMPs, and all the associated regulations. We would encourage you to do the same.