

2021 Cropland Policy Updates Public Comments

Most recent comments are shown first. There were 163 comments submitted before Oct. 15.

Keith Bateman

Comment #163

Lafayette

Oct 14, 2021

As a open space tenant, 5th generation farmer in Boulder County I would like to say thank you for the chance to comment on this subject. I have used many practices and methods over the years from organic to the latest technology. I also have the 6th and hopefully the 7th generation of farmers in Boulder County working alongside me. Farming is a very hard occupation and doing it in an area where urban sprawl is happening makes it even harder. I urge that all bans be lifted on all inputs and go to an out come based plan. I feel any production method should be allowed while using a soil health, carbon reduction, out come.

Vanessa McCracken

Comment #162

Longmont

Oct 14, 2021

Boulder County Board of County Commissioners,

On behalf of the Boulder Valley and Longmont Conservation Districts, thank you for the opportunity to comment on the Cropland Policy. The Districts appreciate the Boulder County Commissioners, and Boulder County Parks and Open Space staff in providing leadership and vision on the sustainability of agriculture and community values around food production and quality.

This Policy is critically important to an agriculture industry that is routinely challenged from outside influences (commodity prices, labor shortages, increasing regulations, climate change, and urban encroachment).

As I spent five years with the Agricultural Resources Division for BCPOS, and now serve as the District Manager for the Conservation Districts, I have a unique perspective on the proposed Policy. I firmly believe the agricultural properties owned and managed by Boulder County are truly a spectacular treasure. In my tenure with Boulder County, I had the privilege of stepping foot on nearly every one of the 25,000 acres, passionately defended the diverse operations of nearly 60 lessees on open space farms and worked tirelessly to encourage and foster sustainable and regenerative agriculture.

Sustainable agriculture which also incorporates community values around food quality and production is a very complex issue with far reaching ramifications. Its complexity is demonstrated by the fact that Boulder County has crafted and modified the Policy over the course of more than a decade.

This complexity requires solutions that blend science, community values, environmental goals, market realities, water availability, and practical on the ground opportunities and limitations. In

market realities, water availability, and practical on the ground opportunities and limitations. In short, there is no simple, one size fits all solution for local producers. The Conservation Districts believe it is these complexities that make Boulder County agriculture the envy of other agrarian communities. In other words, the Conservation Districts celebrate alongside Boulder County the region's diversity.

The Conservation Districts are therefore providing the comments below believing that with collaboration the Districts could assist BCPOS as it continues the Policy's deliberation and implementation.

- 1) Producers need the ability to make choices for their operations based on the location, soil type, irrigation water, crop rotations, scale, markets, equipment, funding, management, labor availability, weather patterns, quality of life, and personal philosophy.
- 2) Boulder County should not support policies which restrict specific crop inputs. The Conservation Districts support policies which champion partnerships with local farmers, working to improve natural resource concerns with holistic management systems and improved soil health, built from ground up collaboration.
- 3) Boulder County should hold all their agricultural lessees to a high standard. After all, they are stewards of public land. We encourage these high standards to be met with incentives (carrots) rather than with policies that ban flexibility (sticks).

It is clear Boulder County Commissioners desire to see Boulder County as national leader in sustainable agriculture. Together, with the Conservation Districts and local producers, that can be achieved. BCPOS and the Conservation Districts have similar objectives and serve many of the same people. This demonstrates the region's agriculture community, industry, and economy are critically important to its constituents, residents, and taxpayers.

Wendell Berry said, "You can't save the land without saving the people, to save either you have to save both". This Policy is not just about the land, its wholly about the people. It is the people that voted for and created BCPOS, and those same people cherish the region's agriculture. Boulder County's agricultural lands are the fabric which weaves our beloved community together. Working together, BCPOS and the Conservation Districts can harness the spirit of our community, and the experience and willingness of our local producers for today and for all future generations.

TOGETHER, we can obtain the vision to be a national leader in sustainable agriculture.

Vanessa McCracken
District Manager
Boulder Valley & Longmont Conservation Districts

Oct 14, 2021

I failed understand with all the past public comments and input from citizens and farmers of our community as to why we are considering to allow GM crops of corn and sugar beets.

There is tremendous amounts of data, that indicates the harm to our soil, critical pollinators and overall environment from these farming practices.

As a commercial beekeeper, citizen of our county and a concerned pollinator advocate, it is disheartening.

Why are we not supporting the sugar beet and corn farmers with technology and funding for them to change their farming practices for more sustainable production, that are in alignment with the overall mission and of our county. Boulder county cannot be a forerunner in sustainability by continuing to support and turn a silent eye to these practices.

Deb Gardner

Comment #160

Longmont

Oct 14, 2021

Please find attached comments from Deb Gardner & Elise Jones

[Download Attachment](#)

Doug Bay

Comment #159

La Junta

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Tony Nelson

Comment #158

Lafayette

Oct 14, 2021

There is a lack of scientific proof that GMOs are damaging in any way. In addition, non-GMO seeds aren't available for many crops, which will actually require more potentially damaging

treatment to the soil and environment.

Richard Andrews

Comment #157

Boulder

Oct 14, 2021

My personal testimony is filed as an electronic document in MS Word format, docx . It contains several parts: (a), Introductory comments; (b) point by point discussion and recommendations regarding the four major policy change recommendations of the Mike Foster memo dated 1 October 2021; and related discussion of elements of the above noted memo; (c) Appendix A a detailed scientific literature review regarding the human health and environmental hazards of the herbicide glyphosate; and (d) Appendix B, supplemental comments on other elements of the Oct 1, 2021 memo of BCPOS Ag Mgr.

Thank you for the opportunity to provide public testimony on this very important matter.

Please feel free to call on me for detailed discussions about the science and public policy aspects of this subject, particularly the bans of pesticides on open space lands and other county areas, and the missing policy elements that should be established regarding food and agricultural practices in Boulder County..

Richard D. Andrews

[Download Attachment](#)

Connie Nelson

Comment #156

Lafayette

Oct 14, 2021

This ridiculous 'non-GMO' will put farmers out of business in Boulder County. I am adamantly opposed.

Connor Meining

Comment #155

Denver

Oct 14, 2021

Agriculture is an essential part of the Colorado economy. Producers throughout the state provide security to the local food supply; helping to keep prices within reach for middle class families and continuing to provide for a growing number of Coloradan consumers, while faced with shrinking resources and limited public support. This ongoing challenge is all too common to the agricultural producers of Boulder County.

The attack on agriculture must stop. It is perplexing to see so many cries for a more reliable and affordable food supply from the same hypocritical proponents of bans on agricultural technologies and advancements. The science being applied to agriculture is astounding, yet blatantly overlooked. The state of Colorado, and specifically the Front Range region, is in the

stability overlooked. The state of Colorado, and specifically the Front Range region, is in the midst of an explosive population growth, requiring fewer resources to be shared by more consumers. How then can proponents justify restrictions on the groundbreaking technologies allowing farmers to reduce water consumption, increase yields, and run their operations more efficiently than at any other time in history?

Sustainable agriculture is the top priority of all environmental stewards; none more so than our Colorado farmers. However, without the ability to economically utilize the seed and pesticide technologies available to them, Boulder County farmers are being restricted in their contribution by the very authorities who should be supporting the agricultural enterprise more than ever before. On behalf of all Coloradans, I ask that you strongly consider reversing the GMO and neonics bans. Allow our farmers to farm, and let the original stewards of Boulder County demonstrate their ability to do more with less, as they continue to adapt their operations to meet the everchanging demands of our dynamic society.

Kevin Abbott

Comment #154

Fort Collins

Oct 14, 2021

Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable.

Nan Auhl

Comment #153

Castle Rock

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Katie Ruiz

Comment #152

Longmont

Oct 14, 2021

Oct 14, 2021

I support the raising of GE crops and request the commissioners to listen to science.

Scott Schlagel

Comment #151

Longmont

Oct 14, 2021

As a 5th generation farmer, I have been around farming my whole life. After college, I went to work in the private sector for 2 years. In 2011, I returned to work on the family farm, and I am in the process of taking over the farm. Since I have lived on a farm my whole life, I have witnessed a lot of changes to farming with the introduction of GMO crops. They have helped to improve crop yields as well as to decrease the amount of pesticides that we use.

As a farmer, we are always willing to try different things and one of the things that we are trying to improve is our soil health. The past 3 years we have been applying compost to our fields to try and improve the soil.

The original Cropland Policy (which allows GMOs and neonics) was working very well and the Commissioners should reverse all the bans and allow the farmers to use the most advanced seed and pesticide technologies. I hope that you vote to do away with this policy and revert to old policy.

Jack S

Comment #150

Boulder

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Sarah Nassif

Comment #149

Loveland

Oct 14, 2021

Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable.

and economically sustainable.

Ruby Bowman

Comment #148

Longmont

Oct 14, 2021

Phase out neonicotinoid pesticides and do not allow GMOs to be grown on Boulder County open space. I am hoping one day neonicotinoid pesticides and GMOs are not allowed on public owned land in Boulder County, including agricultural land owned by Longmont in Weld.

Ellen Burnes

Comment #147

Longmont

Oct 14, 2021

Please find comments attached.

OPPOSE proposed changes.

[Download Attachment](#)

Sue Schlagel

Comment #146

Longmont

Oct 14, 2021

As a Boulder County homeowner and property tax payer, I strongly encourage Boulder County commissioners to remove all bans on GMO crops.

Kim severeid

Comment #145

Lafayette

Oct 14, 2021

I support the use of gmo use on open space.

Garrett Mauch

Comment #144

Lamar

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that

and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Christopher Colflesh

Comment #143

Silt

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

J Koehn

Comment #142

Canon City

Oct 14, 2021

No other way to say it but keep your nose in your own business. You don't own the land or pay the taxes on the land. If you owned the land and rent it to a farmer you may have a say so. No political correctness here. Thanks

Chelsea McGuire

Comment #141

Gilbert

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not

been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

David Cox

Comment #140

Palisade

Oct 14, 2021

I fully support the banning of genetically engineered plants. God given ability to hybridize - naturally - to achieve higher yields, pest resistance, and environmental adaptation has been a mainstay of crop improvement for all time. It works and remains outside the realm of "frankenstein" creations in a lab that have proven to be highly harmful to those who ingest them. Genetically engineered seed also has encroached on organic farmers ability to propogate seed without being sued for patent infringement by one of the giant seed conglomerates who hold the patents on the gmo cross pollinators.

christopher kederich

Comment #139

canon city

Oct 14, 2021

Leave agriculture ALONE!

Dennis & Jackie Gould

Comment #138

Longmont

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

We support the above. Thank you

Odelia Funke

Comment #137

Boulder

Oct 14, 2021

I endorse the first two recommendations, on Neonicotinoid Phaseout (of pesticides) and on increasing Soil Health.

I am strongly opposed to the third recommendation, that is, allowing GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land.

-It is particularly troubling if such varieties are provided by Bayer/Monsanto. Monsanto has been a particularly damaging actor. Some of their GE products have been shown to infect other farms, with bad consequences. Organic farmers have been victims to this huge and powerful company, when Monsanto pesticides and/or GMO seeds have blown into their farmlands.

-Chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems. It also contributes to climate change.

-A fairly recent lawsuit in Missouri (filed by a peach farmer) showed the crass disregard and manipulative practices of Bayer/Monsanto, specifically regarding their calculated plans for encouraging INCREASED USE of pesticides (theirs, of course) on their GE crops, to the detriment of any farmer who does not adopt their expensive "system". Regardless of what the company claims, their approach is to persuade or force farmers to use their products, including higher levels of pesticides (which are poisons by definition) or face destruction of their crops, because their poisons do drift to neighboring (non-Monsanto) farms and fields. -Companies like this are an engine for increasing pesticide loadings in our stressed ecosystems. (Against strong odds and an army of lawyers, the Missouri farmer won the case.) Another concern is that these pesticides are increasing the development of 'superweeds' and need for stronger pesticides; the entire logic/cycle is destructive and self-defeating.

-Engineering plants/seeds to be pesticide resistant encourages greater pesticide use. These poisonous chemicals not only go into the soil, but they are washed away into streams and rivers, poisoning waterways far away from where they are used. Poisons can seep into aquifers.

- There is a worldwide insect crisis, with potentially dire consequences for our crops; the US has been experiencing severe problems with regard to bee deaths for a number of years. Roundup, including the inert ingredients, has been shown to harm bees of all kinds by harming their gut biome and their reproductive systems.

-Roundup creates unhealthy soil, which has limited ability to grow crops without manufactured fertilizers/chemicals. Unhealthy soils cannot adequately sequester carbon, which means this process also adds to the climate crisis.

-WHO (World Health Organization) has labeled the chemical in Roundup a 'probable carcinogen'. Numerous lawsuits have been filed, and significant suits have been won, regarding the serious adverse health effects from Roundup exposures. Even when/if this product is removed from shelves, the evidence of callous disregard of human and ecosystem health, and the perverse logic of selling seeds engineered to withstand greater levels of pesticides, is at the heart of this farming process, and the industry's marketing strategy. It is not a good or safe process. Our farms and farmers, as well as consumers, should be protected from it.

Odelia Funke

Megan Johnson

Lafayette

01/11/2024

Comment #136

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Clara Houghteling

Comment #135

Loveland

Oct 14, 2021

Though I cannot currently afford to live in Boulder County, I spend much of my time there as a graduate student at CU Boulder and a volunteer at local wilderness areas (including some farms). I grew up in the surrounding area, and I plan to continue living and working in/near Boulder after graduation. I love the place dearly.

From the position of someone very much interested in the future health of Boulder County, I am extremely disappointed by the possibility of allowing Roundup ready beets and corn to be planted on public land. The question, of course, must be WHY such a provision would be included, and it doesn't take an expert to recognize that the reason would be to use a heavy pesticide load on crops in the future.

As much as this would be great for big corporate farms and pesticide manufacturers/distributors, it would hurt the health of farmers, pickers, local wildlife, regional pollinators, and surrounding plant life. Glyphosate (Roundup) is a biodiversity killer. It leaches into the ecosystem, poisoning soil and water, and has deleterious effects on pollinator populations. There is compelling evidence that it increases the risk of certain serious cancers. (A study from McGill University in Canada: <https://www.mcgill.ca/newsroom/channels/news/widely-used-weed-killer-harming-biodiversity-320906>); (a summary of recent studies: <https://www.sierraclub.org/sierra/new-study-shows-roundup-kills-bees>); (a summary of findings from the University of Washington School of Public Health: <https://deohs.washington.edu/edge/blog/can-roundup-cause-cancer>).

In an era when we know that carbon sequestration and environmental resiliency depend upon maintaining biodiversity, soil health, and robust pollinator populations, why would you, as the stewards of Boulder County's public health, take this step backward? We cannot continue to poison our way out of the agricultural crisis. We are ruining our arable land, hurting our ag workers, and eliminating the possibility of replenishing the biodiversity that makes soil healthy and farming possible in the first place. Please think beyond this election cycle. Our future really is in the balance.

Peter Newton

Comment #134

Boulder

Oct 14, 2021

The scientific literature indicates (1) that there is not strong evidence of environmental or human health risk from GE crops (e.g., <https://www.nationalacademies.org/news/2016/05/genetically-engineered-crops-experiences-and-prospects-new-report>); (2) that there is strong evidence of sustainability benefits from GE crops (e.g., https://www.nature.com/articles/s41598-018-21284-2?source=post_page; <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0111629&r=0>); and (3) that public perceptions and beliefs about GE crops often do not align with scientific knowledge and understanding (e.g., https://www.nature.com/articles/s41562-018-0520-3?fbclid=IwAR30WYbCtWb7UBJzqomzSITrVGZ_cHUaRN4CeU4vsCWJVpyGfF9n-Phmbjk). My opinion, based on that evidence, is that there is little credible scientific basis for banning GE crops in Boulder County.

Chad Musick

Comment #133

Mead

Oct 14, 2021

As a current Boulder County Open Space tenant, 3rd generation farmer, and state board member of the Colorado Farm Bureau, I would like to submit comment in favor of utilizing the original Cropland Policy, and reversing all bans that have been put in place. The original Cropland Policy (which allows GMOs & neonics) was working very well. I urge the Commissioners to reverse all of the bans, and allow us to utilize the most advanced seed and pesticide technologies that are available. These technologies enable us to remain environmentally and economically sustainable. There is a significant amount of misinformation in the County about how food is grown, and the average person is two generations removed from agriculture. This does not mean that we should be subject to anti-science policies that limit our ability to run a successful operation, due to public misperception. All of Boulder County's longtime farmers are committed to sustainable agriculture. The attempted "transition plan" has not been successful for us, because it was based on a flawed idea and simply does not make sense for our operations. Please do not place additional restrictions on us, as farming in an urban area already comes with many challenges. Allow us to farm and utilize technology as we best see fit, with our multi-generation knowledge and agriculture education backgrounds. Allow us to partner with the County on farming innovations that are truly sustainable, based on measurable outcomes, and allow us to continue feeding the world.

Vicki Schlagel

Comment #132

Longmont

Oct 14, 2021

I am a proud wife and mother of Boulder County farmers. Farming is a very difficult occupation.

It's easy to make policy judgments from downtown Boulder. You need to spend time on the productive farms in Boulder County to understand how agriculture today is based on science and technology. I would challenge anyone to do a better job than these farmers that are taking care of Boulder County Open Space. Give them the support and the tools they need to continue caring for these properties for years to come.

Reverse the ban on GE crops!

Richard Miller

Comment #131

Lafayette

Oct 14, 2021

As a resident of Boulder County since 1987 and a farmer in Boulder County owning and leasing farm ground from private individuals and BCPOS please hear me out. I ask that you reverse the decision made by the prior County Commissioners Jones and Gardner imposing the phaseout of any crops developed using GMO technology and the use of neonic seed treatments and insecticides. Unfortunately I believe their actions were based on political motivations and ideologies verses sound science and facts. This decision has adversely affected and harmed their partners and your partners and tenants who are the farmers that watch over and take care of your land. These crop production and protection tools have been thoroughly researched, vetted, and approved by the USDA and EPA. They are an integral mainstream part of modern crop production. Over 90% of all corn, sugar beets, canola, soybeans and cotton varieties planted in the USA are developed and improved with GMO technology traits that enhance crop production while minimizing pesticide use. Productive farms and open space go hand in hand in increasing the landscape of Boulder County. Good farms don't happen without good farmers. Give your farmers the the tools to do their jobs correctly and they will. Don't micromanage their production techniques but evaluate their results. Trust them to manage your land correctly and they will. Please respect them and give the freedom to farm correctly by allowing the farmers the ability to farm within the framework of the USDA and EPA guidelines.

Blake Cooper

Comment #130

Fort Collins

Oct 14, 2021

Please find my written comments in the attached file.

Based on my extensive experience working on sustainable agriculture with Boulder County's tenant farmers, I believe that the County should shift its focus to measurable outcomes (such as soil health metrics) instead of an outdated focus on inputs. I ask that the Commissioners fully repeal the bans on GMO seeds and neonics. I ask that the Commissioners strike Appendix 13 and the Revised Transition Plan, and return to the parameters in the original Cropland Policy.

[Download Attachment](#)

Deborah Fildes

Comment #129

Rebecca Laiuna

Comment #129

Aurora

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Jennifer Musick

Comment #128

Mead

Oct 14, 2021

As a current Boulder County Open Space tenant, a 4th generation farmer, and a proud woman in agriculture, I would like to submit comment in favor of utilizing the original Cropland Policy, and reversing all bans that have been put in place. The original Cropland Policy (which allows GMOs & neonics) was working very well. I urge the Commissioners to reverse all of the bans, and allow us to utilize the most advanced seed and pesticide technologies that are available. These technologies enable us to remain environmentally and economically sustainable.

There is a significant amount of misinformation in the County about how food is grown, and the average person is two generations removed from agriculture. This does not mean that we should be subject to anti-science policies that limit our ability to run a successful operation, due to public misperception.

All of Boulder County's longtime farmers are committed to sustainable agriculture. The attempted "transition plan" has not been successful for us, because it was based on a flawed idea and simply does not make sense for our operations. Please do not place additional restrictions on us, as farming in an urban area already comes with many challenges. Allow us to farm and utilize technology as we best see fit, with our multi-generational knowledge and educational backgrounds in agriculture. Allow us to partner with the County on farming innovations that are truly sustainable, based on measurable outcomes, and allow us to continue feeding the world.

Esther Hobson

Comment #127

PUEBLO WEST

Oct 14, 2021

Listen to the farmers. Do you want your food to go way up in price, or not have any?

Gus Gill

Comment #126

Centennial

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

tom Honn

Comment #125

AULT

Oct 14, 2021

I support the use of scientifically proven seeds and farming techniques that increase productivity and agricultural success. If one makes their living in an industry and uses time tested and best practices, should they be penalized because some folks, not in the industry and not therefor understanding of the benefits of the technological changes put a stop on the practice?

If one doesn't find a technique or industry standard appropriate, don't use it. There are other items or products to be used. .

Frank Drotar

Comment #124

Pueblo

Oct 14, 2021

CO

Keep up the fight!!!

Victoria Livingston

Comment #123

Centennial

Oct 14, 2021

Please allow the farmers of Boulder County to use whatever seeds/treatments that they deem appropriate, and please do not saddle them with more regulations. They know what they are doing.

Chrissy Wright

Comment #122

Ignacio

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Mark Keller

Comment #121

Castle Rock

Oct 14, 2021

In regards to the proposal to ban the planting of GMO seeds and the use of neonics: Those making this decision need to have a fully developed and un biased understanding of what kind of an impact a decision like this can make, and why they are choosing to make it.

Too many times we see a response to phrases and buzz words like GMO, with little understanding of anything other than the fact that it is Genetically Modified.

Since the beginning of agriculture amongst the indigenous peoples, humans have assisted nature by cross breeding and essentially "Genetically Modifying" produce and grains. The purpose of this has been to create more stable drought resistant, pest resistant, and more abundantly producing crops. With modern technologies we have the ability to assist this natural evolution of our crops to continue this process.

People who are crying out for the ban in use of GMO seeds, are not looking at the repercussions of what will happen if the farmers are not allowed to use such a product. What will essentially happen by banning the use of GMO seeds is: less weather resistance, less draught resistance, less pest resistance, and ultimately lower yields in harvests.

By banning GMO seeds you will be lowering yields in harvests, which can lead to the inability for farmers to be able to survive and continue farming. This loss in farms partnered with the

farmers to be able to survive and continue farming. This loss in farms partnered with the reduced harvest yields will have a dramatic impact, not only in driving up the cost of the agricultural products that are able to be produced, but in continuing to limit the success of the economy of the area.

Banning GMO seeds and the use of neonics, is BANNING THE SUCESS OF BOULDER!

Jules Regnier

Comment #120

Longmont

Oct 14, 2021

For too long persons who have no skin in the game have been telling the commissioners how farmers should be farming. Without the new technologies farmers cannot compete using 1950's methods. Modern methods, seed innovations, and chemicals make it possible for the move to a more positive outcome for production of food, fiber, and care of the land.

One observable consequence is the gain in invasive plants on county open space lands.

Susan Innezs

Comment #119

Loveland

Oct 14, 2021

I am a Agriculturist for Western Sugar Cooperative and have worked with the growers in Boulder County for 30 years. They are good stewards of the land that they farm for the county. These are good growers who have changed practices as science and technology has advanced.

Two things that have made the growers more productive is the Roundup Ready technology for sugar beets and the use of neonic insecticide as a seed treatment. The growers deserve to be able to use the approved technology that is approved and on the market. These growers are smart enough to use technology safely and use it to increase yields and make more money in order to stay in business and make a living. The growers have been able to use less herbicides and insecticides because of this technology.

The ban on GMO and neonics should be lifted to allow the growers on Boulder County Ground an even playing field with the growers who are outside of Boulder County ground.

Thank you,

Susan Inness

Bruce Talbott

Comment #118

Palisade

Oct 14, 2021

Boulder County's farmers are an important part of the community and are committed to sustainable agriculture. Crop production in the US is highly competitive and if these farmers do not have access to the tools that allow them to farm competitively, they will eventually cease to exist.

The original Cropland Policy (which allows GMO's and neonics) was working very well, and the

Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful , and that is because it was based on a flawed ideal.

Allow Boulder County famers an opportunity to survive and allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Mike Litzenberger

Comment #117

Mead

Oct 14, 2021

As a current Boulder County Open Space tenant, and 3rd generation farmer, I would like to submit comment in favor of utilizing the original Cropland Policy, and reversing all bans that have been put in place. The original Cropland Policy (which allows GMOs & neonics) was working very well. I urge the Commissioners to reverse all of the bans, and allow us to utilize the most advanced seed and pesticide technologies that are available. These technologies enable us to remain environmentally and economically sustainable. There is a significant amount of misinformation in the County about how food is grown, and the average person is two generations removed from agriculture. This does not mean that we should be subject to anti-science policies that limit our ability to run a successful operation, due to public misperception. All of Boulder County's longtime farmers are committed to sustainable agriculture. The attempted "transition plan" has not been successful for us, because it was based on a flawed idea and simply does not make sense for our operations. Please do not place additional restrictions on us, as farming in an urban area already comes with many challenges. Allow us to farm and utilize technology as we best see fit, with our multi-generational knowledge and educational backgrounds in agriculture. Allow us to partner with the County on farming innovations that are truly sustainable, based on measurable outcomes, and allow us to continue feeding the world.

Jason Evenson

Comment #116

Bloomington

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

K Carter

Comment #115

Pagosa springs

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Connie Hass

Comment #114

Trinidad

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Leah Braton

Comment #113

CALHAN

Oct 14, 2021

As a Colorado Native, I am so saddened at how our government is making farming more work than they already put in.

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Tony Hass

Comment #112

Trinidad

Oct 14, 2021

Private property owners have the right to Farm and use gmo seeds and neonics as both have been proven safe and effective in farming practices.

Rachel Marks

Comment #111

Lamar

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Erin Michalski

Comment #110

Breckenridge

Oct 14, 2021

Oct 14, 2021

All of Boulder County's longtime farmers - and ALL FARMERS ALIKE - are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. In the end, this is the overall goal right - to be more environmentally sustainable! The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Heath Laber

Comment #109

Longmont

Oct 14, 2021

Just a little history about my self to start off, My Name is Heath Laber I grew up on two farms in Boulder County one off 287 and Niwot Road where we raised Hogs, Sheep, and Irrigated crops. Then our home farm that Alex Laber purchased off of 95th and Oglala. Our farm was one of the first to be pushed to change our farm practice and knowing that we would not be able to manage that many acres any longer my father Mike Laber made the choice to let go of ground that we had farmed for 3 generations when my Grandpa Henry Laber retired. My Brother and I made the choice to not farm well before that since we would not have the acres to support two more families which I would have been a 4th generation farmer on Boulder county ground. Yes I'm still active in our small livestock operation but not to what it use to be. I made the choice almost 18 years ago to work for American Pride Coop which is now Agfinity and become a Applicator and now I currently do Chemical, Fertilizer, and Seed sales along with consulting . Even though i do not get to farm our family ground I work with the growers that do and others in the area as a consultant. I have been trained in GE crops, crop rotations, fertilizer, and many hours of chemical training every year to bring the best advice to all growers. I personally feel that with GE crops , Chemicals , and Fertilizers we need to utilize every "tool" we have in the toolbox. not all are a perfect fit and that's why I enjoy consulting and working with the growers of Boulder County I want to give them every chance to be profitable and that goes for BCPOS since they are the ones that own the ground we have to manage the soil we have and have all the tools available to do it. We currently still farm the 20 acre field by the house and I get the option to pick "Heaths" best corn to plant and I do small plots in the field and use a limited irrigation and limited fertilizer senecio and still see 250+ Bu corn in plot areas that my grandpa told me that he never got over 190bu corn. I know the technology works and is safe I want to see the farms that My Great Grandpa worked be profitable and sustainable for the growers that farm them now with every tool they can. I'm in favor of the use of GE crops and the use of the required pesticides for use under the labels that are provided to us as Growers and Consultants.

Charlie Talbott

Comment #108

Palisade

Oct 14, 2021

Farmers have historically demonstrated a commitment to sustainability even before it was in vogue as their livelihood is immediately on the line. This is just as true in Boulder County as in any other. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. Embracing newly developed genetic tools in food production is just as valid and important as it is in the medical field where we embrace new life-saving innovations.

I understand that the original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Kim Oneill

Comment #107

Silt

Oct 14, 2021

best).

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes

Norm Johnson

Comment #106

Bennett

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Jayde Van Cleave

Comment #105

Rush

Oct 14, 2021

In order to continue sustainable agriculture in today's society, Boulder County farmers should be encouraged and allowed to utilize the most advanced technologies and practices that benefit everyone. Bans based on flawed and inaccurate data create undue burdens on producers and limit choice for consumers. In the end everyone loses. Let's give Boulder County farmers the support they need to make all of our lives sustainable.

Reece Melton

Comment #104

Toponas

Oct 14, 2021

I grew up in Boulder County and remember many times having this same conversation at public hearings. To this day, scientific data fails to defend why GMO crops in legal/approved use, pose any detrimental or high risk to human health or the environment. In fact the evidence suggests the exact opposite. That GMO crops are just as healthy or nutritious than organic or traditional crossbred species. Not only that, producers are able to apply LESS pesticides, LESS herbicides and use LESS fossil fuels to produce a crop.

In today's world of COVID-19, we hear the phrase "follow the science" or "experts say" or "according to a reliable source". And we listen, and you have listened. Regardless of political motivation or bias...or at least I hope you have. The same, sound minded, rooted in scientific data/study decision making should be taken into consideration regarding GMO crops in Boulder

County.

I grew up and still actively work from the perspective of the cowboy and the hippy. Raising my own cattle, my own corn crop and receiving a masters degree in natural resources and management, I came to quickly admire ecological concerns related to our environment, as well as, agricultural production. And the data doesn't lie. The science shows that your upcoming decision should result in the freedom to plant GMO products. The fact is, a decision to ban such practice would influence greater implications to the environment and you would be working against the very platform I am sure you ran to support. That being sustainability and lowering our consumptive inputs in any industry.

Please consider the science and make a decision that is not only right for producers in your county, but also right for the health and sustainability of our State.

Brenda Haun

Comment #103

Grover

Oct 14, 2021

Farmers need to have the freedom to do their jobs based on their knowledge and experience. Do. Not regulate what they can plant. That is dangerous business. If you want to make an impact, encourage transparency and labeling of agricultural products. Then consumers can choose what they support.

Jackie Elliott

Comment #102

Beulah

Oct 14, 2021

I beg of you Commissioners, to repeal all of the bans passed in 2016 (to reinstate the farmers' ability to use the seeds and chemistries they feel are best).

Jake Lebsack

Comment #101

Denver

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that

is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Dee Burns

Comment #100

Paonia

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Bernadette Fuoco

Comment #99

LOMA

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly

sustainable and based on measurable outcomes.

Karl Burns

Comment #98

Paonia

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Jane Lundwall

Comment #97

Centennial

Oct 14, 2021

Please Commissioners, Repeal all of the bans from 2016!

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Kacie Sallee

Comment #96

Fowler

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Rachel Gabel

Comment #95

Wiggins

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively.

The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea.

Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

hilary tulloch

Comment #94

boulder

Oct 14, 2021

GE Crops: The GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land.

I am deeply disturbed by the recommendation stated above. Please reconsider and ban the use of all GE seeds grown on BCPOS land. There are countless reasons to ban GE seeds and crops. Here are a few reasons:

Chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems and it is also a contributing factor to climate change. The chemicals in Roundup, including the inert ingredients, have been shown to harm bees of all kinds by harming their gut biome as well as reproductive systems.

Roundup kills all plants that are not Roundup Ready thus depriving pollinators of possible habitat in and adjacent to farmed fields.

GE seeds are automatically coated with neonicotinoids unless specifically ordered well in advance and uncoated seeds cost more to the farmers.

Roundup creates a very unhealthy soil which has limited ability to grow crops without more chemicals. Unhealthy soils cannot adequately sequester carbon. Healthy soil is needed in the struggle to mitigate climate change.

Ongoing and persistent use of herbicides has been shown to create superweeds that are resistant to chemicals.

Chemical runoff is not just active ingredients in pesticides, but all the adjuvants/inert ingredients that can contaminate our water and can drift to surrounding areas - like passive smoke harming those that are not smoking themselves.

Roundup is harmful to humans. The World Health Organization has labeled it as a probable carcinogen. Links have been made to non-Hodgkin's lymphoma and Parkinson's. Multiple lawsuits have been won when juries hear about the harm Roundup use has caused to human health. In fact, Bayer will be phasing out Roundup on retail shelves by the end of 2023.

Austin Vincent

Comment #93

Centennial

Oct 14, 2021

Commissioners,

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Thank you

Zach Riley

Comment #92

Centennial

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was

working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Edward Croissant

Comment #91

EATON

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Jane Uitti

Comment #90

Louisville

Oct 14, 2021

I strongly support the continuation of the county policy to permit tenant farmers leasing open space to grow GE crops in accordance with county policies and agricultural best practices.

As the Commissioners' former Policy Analyst in 2003 who staffed the GMO Technical Advisory Committee, I later was appointed by the commissioners several years later to review existing agricultural practices policies, including those affecting GE crops. I was the first Executive Director of the Farmers Alliance for Integrated Resources (FAIR) in 2013 and 2014.

Given that background in the science, public policy, and political ramifications of developing and implementing current successful county agricultural policy, I am well-qualified to voice my support.

The opposition comments are the same range of comments received by the county over the past 18 years, and every single point of opposition has been addressed over and over scientifically by numerous respected educational and medical associations, including the thousands of studies on safety, nutrition, and environmental benefits, by the US FDA, the US Department of Agriculture, the American Association for the Advancement of Science, the American Medical Association, the World Health Organization, and the National Academy of

Sciences. To date, every argument against GE crops regarding safety and environmental protection has been thoroughly debunked by scientific, agricultural, and medical experts; I, or any member of FAIR, and provide you reliable and credible responses to any and all of those arguments.

As Paul Schlagel said at one hearing, a few years ago: "Activists should not determine agricultural policies. Those policies should be determined by farmers."

Farmers following agricultural best practices who lease county open space need to have the ability to farm as they know best. Your own 2016 Boulder County POS paper comparing cropping systems (conventional, GE, and organic) showed the significant environmental advantages of GE crops over other systems, particularly relative to water use, soil tillage, and yield per acre.

I support the continuation of the use of all approved GE technology on Boulder County Open Space leased to farmers.

Shawn Bruton

Comment #89

Grand Lake

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are scientifically sound, truly sustainable and based on measurable outcomes.

Glenn De Groot

Comment #88

Centennial

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place

additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are scientifically sound, truly sustainable and based on measurable outcomes.

Steven Stewart

Comment #87

Platteville

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Aubrey Suber

Comment #86

Boulder CO

Oct 14, 2021

I feel very strongly AGAINST the current proposal to abandon the transition from chemical-dependent agriculture. I would like Boulder Country to focus more on what getting pesticides and herbicides off Boulder Open Space really looks like. Boulder County is behind the curve on this and it's time to not only catch up but also to lead, there's too much at stake in our environment to keep putting it off, as we are at an environmental tipping point

Thomas bornhoft

Comment #85

Fleming

Oct 14, 2021

Its either pesticides or GMOs , Ivote GMOs

Anna Murphy

Comment #84

Denver

Oct 14, 2021

October 14, 2021

Re: Cropland Policy Updates

To: Boulder County Board of County Commissioners

The Best Community Development Foundation (BCDF) is active in local community research and education

The Beet Sugar Development Foundation (BSDF) is active in beet sugar research and education. The members of the BSDF consist of nine beet sugar processing companies in North America and four sugar beet seed-related companies.

The BSDF supports a full repeal of a ban on GMOs and neonicotinoids in Boulder County. The adoption of biotechnological advances (such as GMOs) in agriculture are an important part of the climate change/sustainability discussion. GMO sugar beets were introduced in 2007, widely adopted in the industry in 2008, and have since offered many environmental benefits including decreased inputs, improved tillage practices, decreased cultivation, decreased GHG emissions (less fuel used), and increased yields (do more with less land). In 2015, our industry submitted a statement to the National Academy of Sciences National Research Council Committee on Genetically Engineered Crops which identified 25 environmental benefits of GMO sugarbeet seeds, and more have been identified since.

The use of neonicotinoid insecticides is also vital to our industry. In sugar beets, for every one seed that is planted, one beet is harvested. It is therefore crucial to protect every sugar beet plant. The use of neonicotinoid treated seed protects beets from damage caused by diseases such as Beet Curly Top Virus (BCTV), a virus spread by leaf hopper insects. Fields planted with untreated seed are subject to BCTV infestations, which can severely damage the plant and significantly reduce yields. In addition, without the availability of neonicotinoid treated seed, multiple applications of alternative insecticides would be required to achieve some level of pest control which is not good for the environment.

The sugar extracted from sugarbeets is an essential ingredient in the U.S. food supply, and it is important to allow use of the most advanced seed and pesticide technologies. The original Cropland Policy (which allows GMOs and neonicotinoids) was working very well, and the BSDF supports utilization of the best available scientific information. The BSDF thanks you for your consideration.

Sincerely,
Beet Sugar Development Foundation

Britta De Groot

Comment #83

Boulder

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are scientifically sound, truly

sustainable and based on measurable outcomes.

cory bateman

Comment #82

longmont

Oct 14, 2021

As a Sixth Generation farmer in Boulder County, I feel that every operation should be able to use whatever has been approved by the EPA and USDA to fit any type of operation while taking care of the land. As for the younger generation of farmers, we need to be able to keep the door open for all opportunities for all kinds of farming for the generations to come. Having the ability to use GMO technology, helps land management and the shortage of labor and the cost of equipment, while helping us be more sustainable to produce food for our area, in addition to reducing pesticides and reduce our carbon footprint.

Kjerstin Bedford

Comment #81

Lafayette

Oct 14, 2021

I support the use of GMO seeds on the use of Boulder County Parks and Open Space land. We need to support our local farmers.

Brad Schlagel

Comment #80

Aurora

Oct 14, 2021

There is no scientific evidence that any of these measures will have any positive effect on public health, but they are guaranteed to hurt the hard working small business owners and residents of Boulder County. The Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable.

Jason Wagner

Comment #79

Denver

Oct 14, 2021

GMO agriculture is often said to be essential to feed people, this is a lie. GMO corn and soy are mostly used to feed cows in confinement lots, which should not exist, they are cruel and require enormous amounts of antibiotics because the animals are living in their own waste. Humans do not need GMO corn and soy to survive. Another huge percentage of what is grown goes towards ethanol, such a waste. Ranchers, right now are raising cattle via holistically managed grazing, that revitalizes the soil and creates rich fertile land, without the need for reliance on GMO corn and soy.

GMO agriculture is 100% reliant on outside synthetic inputs. If they don't spray their crops with

roundup and synthetic fertilizers, they can't grow anything because this practice has destroyed the soil. Healthy, life giving soil is full of bacteria, fungi and insects. Go to any GMO field and all you find is dead dirt. GMO farmers are dealing with super weeds that have evolved to resist

roundup and the only way the agrochemical companies can deal with this is more and stronger herbicides, it's a downward spiral.

The only thing GMO agriculture provides are massive profits for agrochemical companies. It puts farmers into a cycle of debt and dependency as these agrochemicals destroy the ability of soil to sustain life.

Farmers all through the US and in Boulder have shown you can grow plenty of food for people without relying on GMO technology that is literally destroying the soils we rely on.

We don't need confinement lot meat, we don't need GMO sugar beets to create highly processed junk food. We don't need GMO seeds and the associated chemicals to grow food to feed everyone.

Do the right thing and do not allow GMOs to be grown on public lands.

Mark and Kena Guttridge-Corderro

Comment #78

Longmont

Oct 14, 2021

As a local farming family and an Open Space tenant managing 160 acres of public agricultural lands, we would like to express our concern over the current suggested revisions to Boulder County's Cropland policy, specifically item #3 to abandon the current transition plan and allow "Round-Up Ready" GMOs to continue to be grown indefinitely on our public agricultural lands. We strongly disagree with this decision not only because spraying glyphosate (Round-Up) is detrimental to the ecosystems on our public lands but also because it silences 9 years of public discourse and commissioner decisions on this topic. The memo provided says that taxpayers have funded 1 million dollars of this transition, and now it should be abandoned? Even if most citizens support the transitions away from this chemical-dependent agriculture? Is it really that hard to get pesticides and herbicides off our public lands? Cities, counties and even countries have done this around the world and yet Boulder County can't figure it out?

At our farm we have a vision of utilizing public agricultural lands for the benefit of the citizens that own them. To us that has means providing a variety of nutrient-dense foods to the community, providing education and outreach programs to connect youth to the land, and to realize the importance of maintaining a healthy farm ecosystem in order to promote pollinator and wildlife activity. This has resulted in an approach to our Open Space parcels that is free of all pesticides and herbicides and focuses on a diversity of species being grown simultaneously. Resiliency is founded on diversity, ecosystem-building is founded on diversity, carbon sequestration occurs most efficiently when there is a diversity of living species. When glyphosate is used to destroy every living thing in the field except for the genetically-modified crop being grown, that is the opposite of diversity and the opposite of resiliency. Why would the County

want to continue to grow these chemical-dependent monocultures on our public lands? How could the current staff recommendation diverge so much from public opinion on this topic?

We can tell you from experience that transitioning degraded Open Space lands in a regenerative way is not easy, it is labor and resource intensive. Both of our Open Space leases started with two years of cover cropping and incorporating all that nutrition back to the soil before the fields were healthy enough to start growing food for our community. For this reason, our farm has been advocating during this whole process to invest directly in the farmers, to invest in the land before alternative crops are grown. Unfortunately, the strategy of Open Space has always been to invest in "experts" from universities or non-profits rather than investing in the farmers themselves. Nine years and 1 million dollars later we are left with zero results and a proposal to give up on the whole transition? If we would have invested that 1 million dollars of taxpayer funds directly into the six farmers still growing GMOs on Open Space in 2016, we could have bought up those beet shares and relied on their wisdom to pivot to other ventures, instead here we are back at square one, rewinding the clock back to 2012 policies?

For the commissioners or POSAC to accept the current staff recommendations would be a blow to the democratic process and a sign that Boulder County answers to special interests rather than the will of the citizens in regard to our public lands. At the same time, there has been no real support in providing transitions for our current large-acreage farmers and we see nothing new in the current proposal that would suggest that support is on the way. There has been more done in the past two years to advance regenerative agriculture in Boulder County by the Boulder County Sustainability Office investing directly in farmers through grant funding than we have seen from Open Space in 9 years of talking about soil health, and at a fraction of the budget. Why not follow the model that has worked and invest in the farmers directly? Why isn't that included in the current proposal? Why would we continue paying non-profits and universities when we haven't seen any results?

The public is getting tired of being asked for comments and then ignored. The current proposal talks about cost sharing on cover crops and soil-building techniques while citizens have been asking for this in 2012, 2016, 2018, and 2019 public comment sessions. Why isn't this already a common practice? Let's support transitioning farmers in a real way, let's establish stewardship principles and healthy lands that future generations can be proud of, let's stop wasting taxpayer money on "expert" support and invest directly in the real experts- the ones stewarding our precious Open Space land.

Most importantly, let's say NO to the current proposal to abandon the transition away from chemical-dependent monocultures and have a serious discussion of what getting pesticides and herbicides off Open Space really looks like. Boulder County is behind the curve on this and it's time to not only catch up but also to lead, there's too much at stake in our environment to keep kicking the can down the road. We can tell you from first-hand experience that the next generations, from elementary students to college engineers, are willing to do the work to be responsible land stewards, to grow nutrient dense food at the same time as growing healthy ecosystems, but we must help provide the tools and resources needed. It's time for real policy and real leadership for our lands and our planet, not these same business-as-usual proposals, please go back to the drawing board on how to move Boulder County agriculture forward because the current proposal isn't resonating with the reality in the fields or the values of the

citizen base who owns the land. Our farm is here to help in any way we can during this process.

-Mark and Kena Guttridge-Cordero

Ollin Farms
Longmont, CO

Luther Markwart

Comment #77

Washington

Oct 14, 2021

Thank you for reviewing the attached comments.

Sincerely,

Luther Markwart
Executive Vice President
American Sugarbeet Growers Association
[Download Attachment](#)

Steve Skaalure

Comment #76

Billings

Oct 14, 2021

I am a strong believer in the use of the latest technologies available for Farmers to utilize to their best abilities. The use of GMO's and neonics are both environmentally friendly (a great advantage to sustainability) and economically feasible for growers to continue to raise a competitive crop. In this day and age of hunger amongst 30% of the population in United States it is very important that we keep a consistent supply of healthy foods available to the public at a reasonable price. Both the use of GMO crop genetics/seeds and neonics as an insecticide, are important factors in achieving these goals.

Peter Kukowski

Comment #75

Powell

Oct 14, 2021

We serve as the sugarbeet grower association presidents for all regions represented within Western Sugar Cooperative. The core to our success is reliable production and delivery by all of our grower-members. The arbitrary and outdated rules introduced into Boulder County Cropland Policy in 2016 will drive several of our grower-owners out of the sugarbeet business. They will not be able to access conventional sugarbeet seed or non-neonicotinoid-treated seed. We operate as a closed market, meaning every hybrid planted on the farm has been thoroughly vetted by a team of scientists within Western Sugar that ensure it has the necessary yield, sugar content and disease and pest tolerance to flourish under local growing conditions. The hybrids we use are unique to this production region, therefore conventional hybrids that may exist in

Europe are not adapted for our conditions. Furthermore, we have instated rules across the Cooperative banning the importation of seed from Europe since they have weed beets currently absent in the US and we will not allow introduction of a new weed species. Neonics are necessary in Boulder County because of the real and present threat from Beet Curly Top Virus. Seed companies, because of capacity issues, are unable to custom treat small batches. Even if they could, they would be discouraged to do so since the product is needed to compliment the native tolerance to Beet curly top virus that is not active until later in the season and only provides partial control. Loss of neonics would reduce land use efficiency and increase food waste across the county since this virus would be unchecked on many more acres and also infects tomatoes, peppers, eggplants and hemp. In closing, please strongly consider removing the ban on GE crop and neonicotinoids in Boulder County.

Sincerely,

Kim Nile, President, Southern Montana Sugarbeet Growers Association

Paul Stieber, President, Big Horn County Sugar Beet Growers Association

Alvin Whitman, President, Colorado Sugarbeet Growers Association

Kendall Busch, President, Nebraska Sugarbeet Growers Association

Peter Kukowski, President, Big Horn Basin Beet Growers Association

Butch Lind, President, Wheatland Beet Growers Association

Steve McClung, President, NebCo Beet Growers Association

Kim Nile

Forsyth, MT

Oct 14, 2021

We serve as the sugarbeet grower association presidents for all regions represented within Western Sugar Cooperative. The core to our success is reliable production and delivery by all of our grower-members. The arbitrary and outdated rules introduced into Boulder County Cropland Policy in 2016 will drive several of our grower-owners out of the sugarbeet business. They will not be able to access conventional sugarbeet seed or non-neonicotinoid-treated seed. We operate as a closed market, meaning every hybrid planted on the farm has been thoroughly vetted by a team of scientists within Western Sugar that ensure it has the necessary yield, sugar content and disease and pest tolerance to flourish under local growing conditions. The hybrids we use are unique to this production region, therefore conventional hybrids that may exist in Europe are not adapted for our conditions. Furthermore, we have instated rules across the

Comment #74

Cooperative banning the importation of seed from Europe since they have weed beets currently absent in the US and we will not allow introduction of a new weed species. Neonics are necessary in Boulder County because of the real and present threat from Beet Curly Top Virus. Seed companies, because of capacity issues, are unable to custom treat small batches. Even if they could, they would be discouraged to do so since the product is needed to compliment the native tolerance to Beet curly top virus that is not active until later in the season and only provides partial control. Loss of neonics would reduce land use efficiency and increase food waste across the county since this virus would be unchecked on many more acres and also infects tomatoes, peppers, eggplants and hemp. In closing, please strongly consider removing the ban on GE crop and neonicotinoids in Boulder County.

Sincerely,

Kim Nile, President, Southern Montana Sugarbeet Growers Association
Paul Stieber, President, Big Horn County Sugar Beet Growers Association
Alvin Whitman, President, Colorado Sugarbeet Growers Association
Kendall Busch, President, Nebraska Sugarbeet Growers Association
Peter Kukowski, President, Big Horn Basin Beet Growers Association
Butch Lind, President, Wheatland Beet Growers Association
Steve McClung, President, NebCo Beet Growers Association

Mark Spaur
Milliken

Comment #73

Oct 14, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

David Rogers
Boulder

Comment #72

Oct 13, 2021

I am opposed to allowing any GMO or GE crops on County open space land. GMO or GE crops require the use of Roundup, which is harmful to bees and humans, creates unhealthy soil, and creates harmful runoff. Instead, we should be striving for sustainable, organic, regenerative agricultural practices. Please do not reverse the ban on GMO crops on County land.

Rod Brueske

Comment #71

Longmont

Oct 13, 2021

I would like to start with a quote of Abraham Lincoln you can fool all the people some of the time and some of the people all of the time but you cannot fool all the people all the time. As a Boulder County stakeholder and being surrounded by Boulder County agricultural land I have witnessed firsthand the 10 years of failed policies of incremental changes. We have been repeatedly chemically trespassed with industrial agricultural chemicals, we have been flooded by their runoff from poorly maintained soil's and pummeled by dust storms as well. Every day I personally experience the destruction of EIA (extractive industrial agriculture). Has on our tax payer funded agricultural lands.the millions of taxpayer dollars that have been squandered on these incremental changes have netted us zero! After reviewing the new cropland proposal it appears that either the staff that drafted it has historic amnesia, or hopes the stakeholders of our open space lands do. It is basically a re-branded version of a failed policy drafted nine years ago with a few incremental tweaks. Monitoring soil health while still engaging in EIA (extractive industrial agriculture) practices is a waste of our precious time and tax dollars! Instead use the funds to pay the handful of EIA farmers to cover crop and jump in wholeheartedly into regenerative practices. I have attended several of Boulder counties soil health seminars and I have never witnessed any of these leasees of our open space land in attendance! BOCPOS ag department should have as a requirement if you choose to lease our open space land to attend these educational programs. I do realize that this handful of EIA farmers are just a cog in a broken system of extractive industrial agriculture that exploit and abuses our taxpayer funded land. How I would like to see my tax dollars spent are the following.

- 1.find a study in the cost of inaction & the ineffectiveness of incremental changes.
2. Fund soil health education for these EIA farmers and require them to attend these educational programs.
3. Contract with successful large scale farmers such as Gabe Brown, David Oien and learn from their experience.

it is time to look at history and learn from past mistakes! Boulder county needs to step out of the echo chamber of the indoctrinated views of EIA and realize the talking points of sustainability is a farce! The only thing sustainable in their talking points is the corporate profits they want to protect! Abuse exploit and pollute are not words that show up in the definition of conservation! We are in a climate crisis and there's no time for incremental change and it's time for bold decisive action! Anything less will be just another failure to our future generations!

Thanks again Rod Brueske

Shari Hindman

Comment #70

Boulder

Oct 13, 2021

I am writing to ask that all GMO crop production stop in Boulder County. GMO corn (as well as other GMO vegetables) is dangerous to our health, dangerous for the environment, contaminates non GMO corn and is not a safe investment in our future. It is believed that consumption of these genetically engineered foods cause disease and obesity. The science is clear.

These health risks include infertility, immune problems, accelerated aging, problematic insulin regulation, stomach problems, reduction in digestive enzymes, liver toxicity, allergic reactions, antibiotic resistance, cancer and more.

We are basically the guinea pigs for this industry and it will not be long before the truth is known how these compounds degrade our health, degrade our soil and poison our communities. We must secure the health of our community over any other motives. Nothing can replace our health - it is the foundation of survival, growth and expansion of our conscious capacity to make the world a better place for our children.

Tiffany McKay-Williams

Comment #69

Kimberly

Oct 13, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Amy Bakker

Comment #68

Longmont

Oct 13, 2021

Boulder County Commissioners should make the correct and bold decision to reverse all of the bans and allow the farmers to use the most advanced and safe crop production available. Like all aspects of our life, technology both enhances our standard of living while meeting the needs of a growing population. These technologies have drastically reduced the amount and toxicity of the chemicals being used in crop production while at the same time significantly reducing the use of fossil fuels and soil erosion from wind and water. We should trust the science and the farmers that have been feeding those in this county and across the country for generations.

Famuer Rasmussen Jr.

Comment #67

Longmont

Oct 13, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is

a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Ray Edmiston

Comment #66

Longmont

Oct 13, 2021

Please let your farmers raise the crops they choose.

Farming is a tough business. Let your farmers use the seeds and practices they know work best.

Thank you

Ray Edmiston

Rebecca Dickson

Comment #65

Boulder

Oct 13, 2021

Some GMOs can be useful and we might need to turn to them as climate change continues to unfold. But please do not allow GM corn and sugar beets on Boulder County public agricultural lands. They undermine human health, could make the county liable to lawsuits, and they do real damage to the environment.

Here are my concerns:

1) GM corn and sugar beets are modified to make them glyphosate-ready. Glyphosate is the key ingredient in the herbicides Roundup, Rodeo, and other biocides. The World Health Organization has labeled glyphosate "a probable human carcinogen" that has been associated with users developing non-Hodgkins lymphoma. As such, it is dangerous for anyone to apply glyphosate or be exposed to it.

2) Boulder County could be legally liable if farmers or field workers develop non-Hodgkins lymphoma, the cancer that has been linked to glyphosate. Monsanto, the manufacturer of Roundup, has been sued for billions of dollars by Roundup users who have developed lymphoma. A number of juries have been convinced that glyphosate is carcinogenic and awarded millions of dollars in damages to plaintiffs. Monsanto has pledged to spend \$10 billion to settle the thousands of lawsuits brought against them because of Roundup. All of this suggests that glyphosate is a toxic product that the county should shun, if for no other reason than that we make ourselves vulnerable to lawsuits when we allow a product with such a dangerous history to be used on our public lands.

3) Serious equity issues exist if farmers working public lands are hiring others to apply a toxin that has been labeled "a probable human carcinogen."

4) When farmers spread glyphosate on their fields, they kill all the plants but the GM plants, including milkweed, penstemons, dandelions, and other important food crops for pollinators and birds, thus eliminating food for pollinators and birds. This undermines our ecosystem's balance.

5) Constant use of chemicals such as herbicides, pesticides, and artificial fertilizers weakens soil health—and the soil these farmers would be using is county land. How long and how much money will be required to rehabilitate these public lands after these farmers stop growing their GM crops?

6) Continuous glyphosate use can and has led to superweeds that no longer react to glyphosate applications. If this happens, farmers will have to find another way to deal with weeds.

I realize that the farmers who wish to use this product feel it is in their own best interests to plant glyphosate-ready crops. In the long run, though, glyphosate-ready crops serve no one well. Please ban glyphosate-ready crops from Boulder County public lands.

[Download Attachment](#)

David Norris

Comment #64

Bopulder

Oct 13, 2021

file attached

[Download Attachment](#)

Paul Stieber

Comment #63

Hardin, MT 59034

Oct 13, 2021

To whom it may concern,

We serve as the sugarbeet grower association presidents for all regions represented within Western Sugar Cooperative. The core to our success is reliable production and delivery by all of our grower-members. The arbitrary and outdated rules introduced into Boulder County Cropland Policy in 2016 will drive several of our grower-owners out of the sugarbeet business. They will not be able to access conventional sugarbeet seed or non-neonicotinoid-treated seed. We operate as a closed market, meaning every hybrid planted on the farm has been thoroughly vetted by a team of scientists within Western Sugar that ensure it has the necessary yield, sugar content and disease and pest tolerance to flourish under local growing conditions. The hybrids we use are unique to this production region. therefore conventional hvbrids that mav exist in

...the use are unique to the production region, therefore conventional hybrids that may exist in Europe are not adapted for our conditions. Furthermore, we have instated rules across the Cooperative banning the importation of seed from Europe since they have weed beets currently absent in the US and we will not allow introduction of a new weed species. Neonics are necessary in Boulder County because of the real and present threat from Beet Curly Top Virus. Seed companies, because of capacity issues, are unable to custom treat small batches. Even if they could, they would be discouraged to do so since the product is needed to compliment the native tolerance to Beet curly top virus that is not active until later in the season and only provides partial control. Loss of neonics would reduce land use efficiency and increase food waste across the county since this virus would be unchecked on many more acres and also infects tomatoes, peppers, eggplants and hemp. In closing, please strongly consider removing the ban on GE crop and neonicotinoids in Boulder County.

Sincerely,

Kim Nile, President, Southern Montana Sugarbeet Growers Association
Paul Stieber, President, Big Horn County Sugar Beet Growers Association
Alvin Whitman, President, Colorado Sugarbeet Growers Association
Kendall Busch, President, Nebraska Sugarbeet Growers Association
Peter Kukowski, President, Big Horn Basin Beet Growers Association
Butch Lind, President, Wheatland Beet Growers Association
Steve McClung, President, NebCo Beet Growers Association

Rodney Perry

Comment #62

Denver

Oct 13, 2021

I strongly believe that Boulder County should reverse the ban on GE crops that were put in place with the 2016 Cropland Policy changes. GE crops are much more sustainable and better for all living creatures. Science and technology are what will help our planet survive, including the use of GE crops. GE crops use less water, produce more per acre, and require less field work by the farmers, saving fuel and reducing pollution.

The farmers in Boulder County farming on County land are very good stewards of the land and I have faith they will use new technology to further reduce farming's impact to the planet. Once again, please reverse the ban on GE crops.

Thank you.

Ilene Flax

Comment #61

Boulder

Oct 13, 2021

Please reconsider the recommendation that genetically engineered (GE) sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land.

I wholeheartedly support the economic vitality of our county's farmers, and understand that these crops provide economic viability for the agriculture community.

However, they do not support the long-term health of our community overall:

These crops are shipped away from the area: they do not feed and sustain our residents.

These crops are engineered to allow ongoing input of pesticides to be applied to our lands.

These chemicals impact not just the growing plants, but the entire soil ecosystem. They support short-term extraction of resources rather than building life in our soils.

GE crops are not the problem-- round-up ready GEs that call for ongoing pesticide inputs are the problem.

Please find a path forward that supports our agriculturalists while phasing out these harmful chemicals.

Jane Thomas

Comment #60

Boulder

Oct 13, 2021

Please, do not reverse the policy on GE crops growing on public lands. I am opposed to allowing GE crops like sugar beets to be grown on public lands. We should be striving for sustainable, regenerative agricultural practices.

Greg Ludlow

Comment #59

Longmont

Oct 13, 2021

I am speaking as one of the owners for a former family farm that was sold to BCOS early in its life. Carolyn Holmberg was in charge then. I believe Jules Van Thuyne still farms it and that it is still referred to as the Ludlow Farm. We sold with the understanding that this would help preserve production Agriculture in Boulder County. I believe that promise was largely kept by Boulder County until this GMO issue arose. What you are proposing is to put established multi-generation family farms out of business. I only wish there was a way for us to take back our 400 acre farm.

As a retired Ag lender, you are making it much more difficult to finance your existing farmers by limiting their crops and reducing their yields. Lack of income diversification increases risk to both the borrower and the lender. Boulder County has lost most of its better farmers over the past 40 years. The handful that remain are mostly your tenants. Is it your intent to now force them to move or retire?

Kendall Busch

Comment #58

NE, 69361

Oct 13, 2021

To whom it may concern,

We serve as the sugarbeet grower association presidents for all regions represented within Western Sugar Cooperative. The core to our success is reliable production and delivery by all of our grower-members. The arbitrary and outdated rules introduced into Boulder County Cropland Policy in 2016 will drive several of our grower-owners out of the sugarbeet business. They will not be able to access conventional sugarbeet seed or non-neonicotinoid-treated seed. We operate as a closed market, meaning every hybrid planted on the farm has been thoroughly vetted by a team of scientists within Western Sugar that ensure it has the necessary yield, sugar content and disease and pest tolerance to flourish under local growing conditions. The hybrids we use are unique to this production region, therefore conventional hybrids that may exist in Europe are not adapted for our conditions. Furthermore, we have instated rules across the Cooperative banning the importation of seed from Europe since they have weed beets currently absent in the US and we will not allow introduction of a new weed species. Neonics are necessary in Boulder County because of the real and present threat from Beet Curly Top Virus. Seed companies, because of capacity issues, are unable to custom treat small batches. Even if they could, they would be discouraged to do so since the product is needed to compliment the native tolerance to Beet curly top virus that is not active until later in the season and only provides partial control. Loss of neonics would reduce land use efficiency and increase food waste across the county since this virus would be unchecked on many more acres and also infects tomatoes, peppers, eggplants and hemp. In closing, please strongly consider removing the ban on GE crop and neonicotinoids in Boulder County.

Sincerely,

Kim Nile, President, Southern Montana Sugarbeet Growers Association
Paul Stieber, President, Big Horn County Sugar Beet Growers Association
Alvin Whitman, President, Colorado Sugarbeet Growers Association
Kendall Busch, President, Nebraska Sugarbeet Growers Association
Peter Kukowski, President, Big Horn Basin Beet Growers Association
Butch Lind, President, Wheatland Beet Growers Association
Steve McClung, President, NebCo Beet Growers Association

Douglas Munson

Comment #57

Longmont

Oct 13, 2021

At this time I have to stand opposed to allowing "RoudUp ready" crops on public lands. Given the well documented decline in pollinator populations across the country, usage of all chemicals that negatively impact these populations should be strongly discouraged. Perhaps enhanced regulatory restrictions should be considered.

Comment #56

Michael Gerhardt

Longmont

Oct 13, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Michael L. Gerhardt

Comment #55

Richard Seaworth

wellington

Oct 13, 2021

G E crops have been proven safe for several years, science says they are safe.

The government has determined that a G E Shot for corvid 19 that goes into our bodies are safe.

Let farmers plant G E crops to get as much production per acre as possible so we can have extra acres for wild life and public open space.

Comment #54

ted bendelow

longmont

Oct 13, 2021

As you look back over the last three years, you can see what a failure the Non Go program has been. How many thousands of dollars has the county spent to help how many farmers who farm very small, non sustainable "farmetts". The cost/benefits analysis shows a program that hasn't worked, is not supported by the farming community and has been a complete failure.

Comment #53

Karl Dickensheets

Nederland

Oct 13, 2021

I am expressing my opposition to the allowing of any GMO or GE crops on County open space land. The other recommendations for crop land are commendable, however continued use of GE crops and associated pesticides and herbicides is contrary to well established and soil/health/biodiversity sustaining practices.

Kindly

Karl Dickensheets

Comment #52

Ryan Reuter

Scottsbluff

Oct 13, 2021

I would like to voice my support to reverse the ban on GMO's and neonicotinoids that was instituted within the 2016 Cropland Policy Changes. The economic and environmental benefits were never and will never be realized. GE Sugarbeets have increased production of sugar per acre by 2500 lbs. Also the utilization of fuel and emissions has been reduced by 50%. The use of minimum till and no till practices not only reduces fuel use and emissions but soil health is increased, organic matter in soil is increased, erosion is reduced and water runoff/quality is improved. The use of neonicotinoids have reduced the use of insecticides. The safety for the farmer is greatly increased when this is encapsulated on the seed at the rate of 24 grams per acre, versus using a product called counter, a dry flowable applied to the top of the ground, at the rate of 9.8 lbs per acre. The amounts are a huge difference not to mention the safety to the farmer and the general public. I encourage the Boulder County to reverse its ban on neonicotinoids and accept that the science is solid, sustainable and the safest way to produce a great sugarbeet crop.

Comment #51

John Dillman

Scottsbluff

Oct 13, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Comment #50

Rebecca Larson

Longmont

Oct 13, 2021

Boulder County needs to reverse all bans instated with the 2016 Cropland Policy changes. The big promises of economically and environmentally superior alternatives have never been delivered and therefore the "transition plan" has not been successful. All farmers in Boulder County are excellent stewards of the land, making informed decisions about their farming operations. There is no need for the county to become gatekeepers of technology already fully vetted and approved. Therefore the bans on genetically engineered crops and neonicotinoids should be fully reversed.

Sugar beets have a long and proud history in this county and the producers of this crop are leaders in the sugar industry in terms of environmental sustainability. Genetic engineering (GE) has allowed farmers to transition to conservation tillage, improving soil health by retaining organic matter and promoting better soil microbial health. These changes allow for better land use efficiency, water retention, nutrient cycling and carbon sequestration, all key factors for regenerative agriculture. Years after the promise of "no-till organic", this practice is still absent from Boulder County. Losing technologies like GE seed will force farmers to control weeds mechanically with intensive tillage, promoting soil erosion by wind and water and exposing key beneficial soil microbes to damaging UV rays, killing them and reducing their activity and diversity.

In terms of GE crops, it is important to keep in mind that a majority of Boulder County residents are not opposed to this technology. It is a vocal minority sounding the alarm. When GE labeling laws were voted on by Boulder County residents, a majority of Boulder County residents voted AGAINST the measure. This technology has revolutionized sugar beet production, allowing producers to improve land use efficiency (11K lbs of sugar per acre compared to 8.5K lbs per acre with conventional beets), cut water usage by 33%, reduce fuel consumption by 50% and reduce greenhouse gas emissions by 50%.

Sugar beets are not available without neonicotinoid seed treatment. Unlike other crops, all seed treatments are applied pre-market entry and small batch treatment is not possible. This product is not used prophylactically in Boulder County. Even though sugar beets contain native tolerance to Beet curly top virus (BCTV, controlled by neonics by preventing transmission from the beet leafhopper), it is age-dependent and incomplete. Therefore additional lines of control are needed as part of the Integrated Pest Management strategy employed by the farmers. BCTV is a prolific virus with the ability to infect more than 300 species in 44 families., including hemp which has exploded in production across Colorado in recent years. Removing all neonicotinoids in Boulder County will open up the floodgates for this pathogen and likely have devastating effects for small produce farmers as well since tomato, peppers and eggplant are also highly susceptible to BCTV.

If sugar beet producers lose access to neonicotinoids, and the pathogen explodes, the only other product labeled for control of the leafhopper is Counter. Instead of applying 24 grams per acre, farmers will need to apply up to 9.8 lbs/acre of this product. Although both products are safe when used according to the label, handling larger quantities creates greater accidental exposure risk for the handler (a.k.a. the farmer). As mentioned, 100% of neonic application is done at commercial facilities using state of the art PPE, ventilation and dust collection, mitigating risk to the handler. Growers across the county employ best management practices to reduce dust off at planting to eliminate non-target exposure, as sugar beet does not flower therefore is not used by pollinators for foraging.

Lastly, I have had the pleasure of working alongside farmers for 21 years. The technology and farming practices are constantly evolving because their farms are not just providing their livelihoods today, but are their legacy. They have inherited their operations from the generations before them and work tirelessly to ensure future generations will be able to carry forth that

...ere them and their ability to ensure future generations will be able to carry their own legacy. The commitment to the land goes beyond do no harm, farmers across Boulder County, including those using GE crops, are engaged in regenerative practices ensuring the land is handed off in better condition than when they received it. These farmers can quantifiably demonstrate these improvements. The 2016 modifications to the Cropland Policy are outdated dogma. Its time to move away from practice-based rule making and focus on outcome-based measurement. These farmers in Boulder County are some of the brightest minds I get to engage with, they thoroughly vet their options and can deliver the best tailor made solutions, but need every tool in the toolbox to do so. Boulder County needs to abandon the 2016 changes and implement a transition plan that works, transition away from labels and fear, to outcome based measurement.

Amanda Callender

Comment #49

Longmont

Oct 13, 2021

I support GE crops. Follow science.

Keith Schlagel

Comment #48

Longmont

Oct 13, 2021

As a member of a long time Longmont farm family, I have had the privilege of watching agriculture technology grow to meet the increasing demands for cost-effective food production to feed both this county and the world. Nothing has enhanced crop production more than the use of advanced seed and pesticide technologies. These technologies have drastically reduced the amount and toxicity of the chemicals being used in crop production while at the same time significantly reducing the use of fossil fuels and soil erosion from wind and water.

Boulder County's "transition plan" has not been successful due to it being based on numerous false premises. Its failure is obvious if one simply drives around the county and observes some of the failed experiments using the proposed new ideas. In many cases these test plots have produced nothing but weeds.

Boulder County Commissioners should make the correct and bold decision to reverse all of the bans and allow the farmers to use the most advanced and safe crop production available. Like all

aspects of our life technology both enhances our standard of living while meeting the needs of a growing population.

Edward Youngs

Comment #47

BOULDER

Oct 12, 2021

We oppose the following proposal:

GE Crops: The GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land.

How does it makes sense in light of the myriad lawsuits against Monsanto's Roundup alleged harms, as well as Monsanto's stated intention to phase out retail use of the product, to sanction its use in Boulder County (or anywhere else for that matter). Are we not inviting potential future costly litigation by Boulder County against Monsanto, and potential lawsuits AGAINST the county and state for environmental and user harms akin to those in the above-mentioned?

Reversal of the current ban on Roundup and GE crops is an irresponsible step backward, as well as a bad example to set for other authorities in Colorado and elsewhere who view our state and county as progressive and resistant to environmentally harmful behemoths like Monsanto.

Edward Youngs & Brenda Winters

Deirdre Sturm

Comment #46

Longmont

Oct 12, 2021

Do not reverse the ban on Roundup ready crops on our county land. We are in the middle of a mass extinction event, these chemicals kill our pollinators.

Do the right thing!

Deirdre Sturm

Phil Hansen

Comment #45

Longmont

Oct 12, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes.

Paul Schlagel

Comment #44

Longmont

Oct 12, 2021

As a Boulder County farmer I suggest that we just follow the real science. We need all farming practices in Boulder County. We all need to use the seeds and chemistries that are best.

B Sitkin

Comment #43

Boulder

Oct 12, 2021

I urge you to reconsider the use of Roundup or any other chemicals that kill all beneficial microorganisms in our soils for the following reasons:

Chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems and it is also a contributing factor to climate change. The chemicals in Roundup, including the inert ingredients, have been shown to harm bees of all kinds by harming their gut biome as well as reproductive systems.

Roundup kills all plants that are not Roundup Ready thus depriving pollinators of possible habitat in and adjacent to farmed fields.

GE seeds are automatically coated with neonicotinoids unless specifically ordered well in advance and uncoated seeds cost more to the farmers.

Roundup creates a very unhealthy soil which has limited ability to grow crops without more chemicals. Unhealthy soils cannot adequately sequester carbon. Healthy soil is needed in the struggle to mitigate climate change.

Ongoing and persistent use of herbicides has been shown to create superweeds that are resistant to chemicals.

Chemical runoff is not just active ingredients in pesticides, but all the adjuvants/inert ingredients that can contaminate our water and can drift to surrounding areas - like passive smoke harming those that are not smoking themselves.

Roundup is harmful to humans. The World Health Organization has labeled it as a probable carcinogen. Links have been made to non-Hodgkin's lymphoma and Parkinson's. Multiple lawsuits have been won when juries hear about the harm Roundup use has caused to human health. In fact, Bayer will be phasing out Roundup on retail shelves by the end of 2023.

Sincerely

B Sitkin

Mike lefever

Comment #42

Longmont

Oct 12, 2021

All of Boulder County's longtime farmers are committed to sustainable agriculture. While there is a significant amount of misinformation in the County about how food is grown, that doesn't mean that our farmers should be subject to anti-science policies that limit their ability to run their operations effectively. The original Cropland Policy (which allows GMOs and neonics) was working very well, and the Commissioners should reverse all of the bans and allow the farmers to use the most advanced seed and pesticide technologies. This will allow our family farmers to

to see the most successful and possible technology that will allow our family farmers to remain environmentally and economically sustainable. The attempted "transition plan" has not been successful, and that is because it was based on a flawed idea. Please do not place additional burdens on our farmers -- we should not be making their jobs more difficult. Allow them to partner with the County on farming innovations that are truly sustainable and based on measurable outcomes

Mary Jo Zeimet

Comment #41

Longmont

Oct 12, 2021

Greetings:

I am a taxpayer and voter in Boulder County. I supported the previous Commission decision to transition to no-GMO agriculture on County Open Space. I am dismayed that you are revisiting this policy after the exhaustive study the previous Commission engaged in.

I'm confident that many more qualified people will submit scientific information to oppose the reintroduction of GMO crops, so I will keep this brief.

I am not opposed to all GM crops per se, but I cannot support GM crops that function with the application of herbicides and insecticides. Killing everything — plants and insects — is not consistent with good land stewardship. This is part of how we got where we are, the collapse of many species and possibly biodiversity.

I would like to see County public lands foster life, not death. We should promote diverse native plants, insects, animals, not death. We should promote healthy microbial soil life, not death.

What a wonderful thing if Boulder County could promote agricultural policies that created significant carbon sequestration in our public lands. What a wonderful thing if Boulder County could be a leader in developing successful regenerative farming practices in the Front Range. Embracing GMO corn, soy beans, and other pesticide-dependent crops is the past, not a positive future.

Thank you for your time.

rose Pierro

Comment #40

Longmont

Oct 12, 2021

I do not agree that we should create an exception for beet farmers using neonicotinoids on their crops. I believe there should be no pesticides being used in our county. Pesticides are harmful to our health and our environment and there is no positive results from their use. We should help these farmers understand the soil they are trying to farm on and how to improve it by growing the most beneficial monetary crops with no use of pesticides or chemical fertilizers. This education will save us all money in the long term by protecting our environment and

education will save us all money in the long term by protecting our environment and health. Cropland policy should NOT be changed to support GE Crops for a specific group.

Lyn Lowry

Comment #39

Longmont

Oct 12, 2021

I am extremely distressed at the staff proposal to allow GE crops to be planted on our lands. These are Round-up ready engineered seeds. They should have not place in any effort to improve our agricultural lands and make them more sustainable. I won't go into the multiple problems that Round-up poses for our health and welfare as you should be familiar with these. And I am shocked that County Staff would recommend planting such crops when every effort should be being made to ensure that our lands become healthier and sustainable and herbicide-resistant crops be phased entirely out as was decided in 2016. What's going on that now these GE crops are proposed in 2021?

Elizabeth Nitz

Comment #38

Longmont

Oct 12, 2021

I am very against using GMOs/Roundup-ready crops on open space because that means Roundup/Glyphosate will also be used. I do wish it were banned in this country, as it's been proven to cause all manner of issues, not just to humans but to wildlife and whole ecosystems. We should be using regenerative agriculture techniques, silvopasture, permaculture, etc. and be much more focused on localizing our food supply instead of shipping it off and importing processed foods. The will is there, we just need to scale it up. Otherwise droughts and the cost of fossil fuel will severely impact the front range. It's coming.

Anne Wilson

Comment #37

Boulder

Oct 12, 2021

Dear Commissioners,

Life depends on healthy soils and on our pollinators. When reviewing the Cropland Policy, please:

- 1) phaseout neonicotinoids
- 2) work with tenants to improve soil health, include carbon sequestration
- 3) Do NOT allow GE sugar beets and corn on BCPOS land. These are Roundup ready crops. The use of the Roundup herbicide is antithetical to preserving our beautiful ecosystem.

Thank you for your care and concern for our beautiful lands!

Sincerely,

Jahnvi Stenflo

Longmont

Oct 12, 2021

GE crops are largely Roundup ready crops, meaning that they allow the Bayer/Monsanto product Roundup (AKA AGENT ORANGE!) to be sprayed as an herbicide on the field while the crop is growing. I deeply and strongly oppose any recommendation to allow GE crops on PUBLIC LANDS for the following reasons:

1. Chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems and it is also a contributing factor to climate change. Chemically based agriculture is responsible for so much horrific destruction of the Earth and Boulder County should NOT allow it on Public Lands, Open Space or even Private Lands. It has wrought so much havoc in the world and given rise to so much disease and extinction.
2. The chemicals in Roundup, including the inert ingredients, have been shown to harm bees of all kinds by harming their gut biome as well as reproductive systems. Harming the Bee population is a death knell for bio-diversity and for humanity.
3. Roundup kills all plants that are not Roundup Ready thus depriving pollinators of possible habitat in and adjacent to farmed fields. This is just plain irresponsible to ALL LIFE FORMS. Boulder County should reject Roundup Ready (AGENT ORANGE!) crops forever if Boulder County cares about the future of our beautiful lands and open space.
4. GE seeds are automatically coated with neonicotinoids unless specifically ordered well in advance and uncoated seeds cost more to the farmers. This is just not progress for humanity at all. This is bowing to the profit of a few rotten companies (Bayer, Monsanto) and the "convenience" of a few very conservative farmers who should realize the harm they are causing to ALL LIFE on this planet. Boulder County MUST BAN GE CROPS forever.
5. Roundup creates a very unhealthy soil which has limited ability to grow crops without more chemicals. Unhealthy soils cannot adequately sequester carbon. Healthy soil is needed in the struggle to mitigate climate change. Healthy soil is the BEST way to sequester carbon. WE NEED HEALTHY SOIL in Boulder county, not GE crops.
6. Ongoing and persistent use of herbicides has been shown to create superweeds that are resistant to chemicals. The assertion and mentality that GE crops are good for anyone is just plain bad thinking, absent of any critical thought. The only "benefit" goes to the rotten companies (Bayer, Monsanto) who produce GE crops and Roundup. These companies and the farmers who use them are RESPONSIBLE for massively contributing to topsoil erosion, dwindling bee populations, water contamination, increased health issues for humans and for climate change. Boulder County should PROTECT our public lands and our wildlife, bees, waterways and humans from the dastardly, short-sighted, profit-mongering of GE crops.

7. Chemical runoff is not just active ingredients in pesticides, but all the adjuvants/inert ingredients that can contaminate our water and can drift to surrounding areas, just like passive smoke harms those that are not smoking themselves. Let's DO THE INTELLIGENT THING and protect our Boulder County's Public Lands and Open Spaces from ne'er-do-well thinking and BAN GE CROPS forever.

8. Roundup is harmful to humans. The World Health Organization has labeled it as a probable carcinogen. Links have been made to non-Hodgkin's lymphoma and Parkinson's. Multiple lawsuits have been won when juries hear about the harm Roundup use has caused to human health. In fact, Bayer will be phasing out Roundup on retail shelves by the end of 2023, and that is NOT SOON ENOUGH. This is just an abhorrent display of the wrong set of values in Boulder County – that we would even CONSIDER allowing GE Crops after the tremendous piles of evidence that they are incredibly harmful to ALL LIFE, and for EONS.

ORGANIC is the way. Do you really want to consider creating a situation that destroys our fragile ecosystem and open the door wide for cancer and horrific diseases to reign supreme across all forms of life as a result of short-sighted thinking? Please pay attention because this is very important: Boulder County should PERMANENTLY BAN ALL GE CROPS, FOREVER. No if's, no and's, no but's. Do the correct and conscientious thing: Continue the last version of the policy, which was adopted in 2017 which phased out and ultimately banned the use of GE corn and sugar beets on county owned agricultural land. The current staff recommendation to reverse that ban and allow farmers to continue to grow GE corn and sugar beets is a TERRIBLE idea. It should not happen. It's ill-advised and makes me wonder if the current staff has accepted handouts/payola from the GE Corporations.

Keep the BAN!

patricia butler

Comment #35

BOULDER

Oct 12, 2021

To the Boulder County Commissioners:

Thank you for considering updating the cropland policy to allow Genetically Engineered sugar beets and corn to be grown on agricultural county land. As I commented about the former, restrictive, policy proposal on this issue, the county staff and the farmers leasing county land explained in detail the value of allowing these types of crops to be grown on county property in terms of practical farming operations and overall soil health. With appropriate monitoring of adjacent and near by fields, GE crops can be grown on county ag land without endangering the larger environment. I urge you go adopt the revisions to the county cropland agricultural policy proposed by staff..

sonja moskalik

Comment #34

Boulder

Oct 12, 2021

We are stating our opposition to the GE sugar beet and corn varieties being grown on BCPOS agricultural land. Please do not go forward with this part of the proposal.

Sonja Moskalik
James Roper
3650 Pinedale Street
Boulder, CO
80301

Joel Stevens

Comment #33

Boulder

Oct 12, 2021

I am writing AGAINST reversing the ban of GE crops on county land. (#3 in the cropland policy recommendations)

I own a water filtration company, and am well aware of the deterioration in water quality due to chemicals such as round-up being dumped on our soil, as they are with GE crops. Not only that, but the health of our bees is absolutely vital to our entire planet. We need to protect our bees, and protect all the residents of Boulder by saying NO to GE crops.

Lisa Stevens

Comment #32

Boulder

Oct 12, 2021

Hello, I wanted to write as a Boulder resident that while I am in favor of points one and two, the Neonicotinoid Phaseout, and the soil health change, I am strongly against #3, regarding GE crops. It has been shown time and time again that GE crops have a negative impact on our health. Not only that, but they spread and contaminate local organic farmland. Boulder needs to take a stand to protect the health of our pollinators as well our people.

Here is a list of reasons NOT to allow GE crops to grow on Boulder land:

1. Chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems and it is also a contributing factor to climate change.
2. The chemicals in Roundup, including the inert ingredients, have been shown to harm bees of all kinds by harming their gut biome as well as reproductive systems.
3. Roundup kills all plants that are not Roundup Ready thus depriving pollinators of possible habitat in and adjacent to farmed fields.
4. GE seeds are automatically coated with neonicotinoids unless specifically ordered well in advance and uncoated seeds cost more to the farmers.
5. Roundup creates a very unhealthy soil which has limited ability to grow crops without more chemicals. Unhealthy soils cannot adequately sequester carbon. Healthy soil is needed in the struggle to mitigate climate change.
6. Ongoing and persistent use of herbicides has been shown to create superweeds that are resistant to chemicals.

7. Chemical runoff is not just active ingredients in pesticides, but all the adjuvants/inert ingredients that can contaminate our water and can drift to surrounding areas - like passive smoke harming those that are not smoking themselves.

8. Roundup is harmful to humans. The World Health Organization has labeled it as a probable carcinogen. Links have been made to non-Hodgkin's lymphoma and Parkinson's. Multiple lawsuits have been won when juries hear about the harm Roundup use has caused to human health. In fact, Bayer will be phasing out Roundup on retail shelves by the end of 2023.

Ellen Laverdure

Comment #31

Lafayette

Oct 12, 2021

I am submitting comments on the following staff recommendation: "GE Crops: The GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land."

We know that chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems. This model of agriculture is not earth friendly, and is a contributing factor to climate change.

Roundup ingredients harm bees of all kinds; I see that consequences my own garden, with the near absence of bees this year.

Roundup kills all plants that are not Roundup Ready! This deprives pollinators of possible habitat in and adjacent to farmed fields. This also affects birds of the region, as well as important insects.

GE seeds are automatically coated with neonicotinoids (which Boulder County is phasing out!).

Roundup creates a very unhealthy soil which has limited ability to grow crops without more chemicals. Unhealthy soils cannot adequately sequester carbon. Healthy soil is needed in the struggle to mitigate climate change. My area in Lafayette struggles with soil quality due to abandoned mining dumps and mines. It is essentially nearly dead soil that needs much amending to planting. I do not want to see this in other areas due to shortsighted policies.

Chemical runoff contaminates our water and can drift to surrounding areas - like passive smoke harming those that are not smoking themselves.

Roundup has been as a probable carcinogen by the World Health Organization. Links have been made to non-Hodgkin's lymphoma and Parkinson's. Multiple lawsuits have been won when juries hear about the harm Roundup use has caused to human health. In fact, Bayer will be phasing out Roundup on retail shelves by the end of 2023.

Please choose wisely on this matter, and vote for the health of our land. There must be a creative way to assist farmers while protecting the land we live on.

Heather Atwood

Comment #30

Longmont

Oct 12, 2021

I am not a liberal wing-nut environmentalist and I say this so that those who are considering the opinions stated here understand that there are moderates who are also concerned about the environment and especially the decline in pollinator populations. I also have an aunt who had a small farm and she died of Parkinson's Disease as a direct result of Roundup use. She had a very slow, painful death that we all had to suffer with her. I have no idea why or how something as caustic as Roundup is still sitting on store shelves or used in commercial farming. This is an absolute tragedy and as I become more informed, I realize how big this problem is. I urge the county to change/adopt policies that are PRO POLLINATORS. They have a direct role in the survival of this planet. Thank you.

William Rivers

Comment #29

Longmont

Oct 12, 2021

My opinion is that by supporting the use of GMO crops (beets in this case) the Boulder County Commissioners are supporting the use of insecticides and pesticides that are damaging the environment (soil and pollinators) and there will be long term consequences that will be hard to overcome.

Ruth Ellis

Comment #28

Longmont

Oct 11, 2021

To the Boulder County Commissioners,

As you consider the recommendations to revise the current Cropland Policy, I ask that you support #1, the Neonicotinoid Phaseout (?except for GE sugar beets which must be phased out by the end of 2025?) and #2, Soil Health.

The #3 recommendation regarding GE crops cannot be supported if #2 is. I urge you to stay with the June 3, 2019 Amended Transition Plan that was approved to phase-out GE crops on county open space agricultural land, which is GE corn by the end of this year and GE sugar beets by the end of 2025. The Commissioners also requested that staff work to develop incentives for GE tenant farmers to phase out GE crops and pesticides sooner than the phase-out timelines. In no way does growing GE crops increase soil and ecosystem health. The use of Roundup makes sure that nothing else can thrive, except those pesky "weeds" that figure out how to mutate and require more and more Roundup and other pesticides.

Agriculture on our open space agricultural land needs to actively restore the qualities that make it rich with the nutrients reduced through years of pesticide driven agricultural and restore the ecological life for pollinators of all sorts. insects. fish and birds. animals and us humans.

Thank you for your support of recommendations #1 and #2, and total rejection of #3. I've no opinion of #4.

Thank you—Ruth Ellis

Crystal Gray

Comment #27

Boulder

Oct 11, 2021

Dear Commissioners:

Please do not reverse the ban on GMO crops on County land. That was a wise decision in 2017 and is probably more important in 2021 to maintain this ban.

Not only are we in a climate emergency but our earth systems are in a delicate balance.

Pollinators are certainly more important to crops, fruiting trees, nut trees, grains and vegetables than are round up ready crops. Herbicides that are used used on GMO crops can kill pollinators which sustain our food crops..

Please think this through from a stand point of being responsible stewards of Boulder County and future generations trying to exist on this planet.

Best,

Crystal Gray

Chair of the Boulder Open Space Board when GMO's were banned on City OS

Crystal Gray

Comment #26

Boulder

Oct 11, 2021

Dear Commissioners:

Please do not reverse the ban on GMO crops on County land. That was a wise decision in 2017 and is probably more important in 2021 to maintain this ban.

Not only are we in a climate emergency but our earth systems are in a delicate balance.

Pollinators are certainly more important to crops, fruiting trees, nut trees, grains and vegetables than are round up ready crops. Herbicides that are used used on GMO crops can kill pollinators which sustain our food crops..

Please think this through from a stand point of being responsible stewards of Boulder County and future generations trying to exist on this planet.

Best,
Crystal Gray
Chair of the Boulder Open Space Board when GMO's were banned on City OS

lynn segal

Comment #25

boulder

Oct 11, 2021

No neonics and GE "nutrients" on any land over which you have jurisdiction. Bees are life. Water is life too. And water and the atmosphere redistributes these toxins, inhibiting the health and welfare of the humans depending on their use in the web of life.

Stop all use of them yesterday.

Lynn Segal 303-447-3216 24/7

Evan Ravitz

Comment #24

Boulder

Oct 11, 2021

Allowing GE "Roundup Ready" corn and sugar beets also means allowing Roundup (Glyphosate) pesticide on our public lands, which will injure Soil Health, the health of farm workers and the health of people eating the crops. It's also irresponsibly puts the County at risk of lawsuits for these damages, for Roundup blowing onto surrounding farms, endangering their valuable organic certification, etc.

It's unbelievable that you have the understanding to phase out neonic pesticides but allow glyphosate. Aren't you aware that Bayer is paying \$11 billion to settle cancer claims??

<https://www.reuters.com/article/us-bayer-litigation-settlement/bayer-to-pay-up-to-10-9-billion-to-settle-bulk-of-roundup-weedkiller-cancer-lawsuits-idUSKBN23V2NP>

Don't make Boulder party to spreading cancer and paying settlements!

Andy Burgess

Comment #23

Boulder

Oct 11, 2021

Hello,

The following is the first sentence of the Cropland Policy page on the Boulder County website. "Boulder County Parks & Open Space's vision is to be a national leader in sustainable agriculture."

That sounds excellent and very much in alignment with what I believe the vast majority of our population believes to be the way forward and an appropriate use of our public lands.

Surprisingly, the GE Crop Ban reversal in staff recommendation #3 is on the same web page and flies directly in the face of the vision clearly stated above.

I strongly disagree with any policy that allows the use of genetically engineered crops on Boulder County land, and additionally disagree with allowing the abbreviation GE to be used when the true meaning may not be recognized by many who read it. It seems like a subtle trick to try to lessen the public's understanding of what is being put forth by County staff and thereby increase the chances of it being allowed.

Respectfully,
Andy Burgess

James Harper

Comment #22

Broomfield

Oct 11, 2021

As leaders / change makers of Colorado, the USA and the world, Boulder needs to lead by example and ban any Round-up ready agriculture. The persistence of this chemical in the environment coupled with its strong effects on flora and fauna make it something to avoid, especially in a community like Boulder that strives to embrace nature and preserve it for the future. The cold desires of capitalism should not lead this community towards a future without its ideals intact. Please continue to stand against Round-up ready agriculture in Boulder.

Floyd Mills

Comment #21

Boulder

Oct 11, 2021

To BOCC

As a citizen of Boulder County and City I am vehemently opposed the thoe use of "Roundup" glyphosate in agriculture. I am not patently opposed to genetically engineering but genetically engineered crops that are specifically designed to be immune to harm from glyphosate products are of no value if it is prohibited to spray glyphosate products on them.

The GE crop / glyphosate farming system is dangerous to the health of all of us directly and indirectly and I strongly oppose its use in Boulder County and beyond.

The European Union has banned glyphosate. see <https://www.dw.com/en/whats-driving-europes-stance-on-glyphosate/a-53924882>

I stand by the intelligence of the body of scientists in the EU that have shown glyphosate to be harmful both directly and indirectly to humans.

Roundup is produced by Bayer a German owned company. They cannot sell their own product in Germany. How can we, in America, be so naive as to allow its use here?

Maggie Stockin

Comment #20

Louisville

Oct 11, 2021

Greetings.

I strongly oppose the following measure.

GE Crops: The GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land.

Dear Living Beings making decisions and advocating for actions for the benefit of all Living Beings in and around Boulder County.

We must pay attention to the extremely harmful effects of Round-Up and GE crops which are a detriment to human health and biodiversity as well as climate change.

We as individuals making decisions and supporting certain actions must take into account the well being of AELL Living Beings by acting in good conscience regarding crops and soils. The deleterious effects of these types of crops and chemicals is evident and provable.

Do not allow GE sugar beet and corn to be grown on BCPOS agricultural land.

anne anderson

Comment #19

Longmont

Oct 11, 2021

My concern addresses the planting of GE sugarbeet on Boulder land. Although it is not clear I believe this beet will be engineered for glyphosate resistance, meaning that the crop during its growth likely will be sprayed with this herbicide.

I am concerned about the nontarget effects of glyphosate due to the compound itself and other chemicals in its formulation. The chemical will inhibit metabolism of sensitive microbes as well as plants. Microbes are essential for plant and soil health, as well as digestive and protective systems in life forms eg insects, animals and humans. Additionally there is research indicating that Mn utilization in crops is disturbed- Mn is an essential element for all life forms. Decline in citrus groves due to heavy glyphosate use is one example.

Well documented too is the spread of the gene engineered into the plant for glyphosate resistance into nontarget plants from the region where the GE plant is grown. Monsanto counters this by now engineering plants with a mix of other herbicide resistance genes so that the problem swells but the genes for resistance would be out there to spread more widely

the problem is that the genes for resistance would be able to spread more easily without control.

Could Boulder Co set a prime example where its agricultural land develops sustainable and regenerative practises for crop raising? The initiative on soil health is a wonderful positive example especially as we enter years of continued plant stress with climate unpredictability. So why then counteract this positive move with other lands being impacted with a synthetic herbicide that is known to have detriments.

Please consider the cropping of GE plants carefully and decide to help Boulder Co flourish with land that is building for a better future: the next generation depends on it

sincerely Anne Anderson

Suzanne Bhatt

Comment #18

Boulder

Oct 11, 2021

I fully support the recommendations to phase out all use of neonicotinoids by the end of the year and to work with farmers to improve soil health and utilize carbon sequestration techniques, and I thank you for those policy suggestions. However, I strongly oppose recommendations to allow farmers to continue planting Roundup ready GE corn and sugar beets on county land. Roundup is known to harm bees through both direct physical damage to the gut and reproductive systems as well as reducing pollinator habitat by killing beneficial plants adjacent to treated fields. It is widely recognized that bees, critical to the pollination of both agricultural crops and our native wildflowers, are suffering serious declines, in part due to the use of pesticides like Roundup. Roundup has also been targeted by the World Health Organization as a probable human carcinogen. Additionally, the neonicotinoid coating on GE seeds runs directly counter to the policy of phasing out these chemicals. The discussion of eliminating GE crops on county ag land has been ongoing for a number of years, giving farmers ample warning to move to other, more sustainable practices. It is time to make this change and insist that farmers on county ag land utilize best practices for sustainability, soil health, and pollinator safety.

Ann Cooper

Comment #17

Boulder

Oct 11, 2021

Dear County Commissioners:

I applaud two of the staff recommendations regarding Boulder County Cropland Policy. It is encouraging to see a prompt phase out of Neonicotinoids that are so damaging to insect life. And a focus on improving soil health should be a given.

However, I do not believe that growing GE crops on county agricultural lands makes sense biologically.

Plants that are engineered to withstand roundup as part of their growing regime are harmful to insect life--pollinators especially. From the prevalence of neonics as seed coatings on Roundup ready starts, to the destruction of plants other than the Roundup ready crops, thus depriving insects of other food sources, to the drift of pesticides that fog surrounding areas, the use of these methods ends up harming insects, whether they are beneficial or otherwise.

I have been conducting insect surveys on county properties for more than ten years, mostly concentrating on documenting dragonfly and damselfly populations. There is no doubt in my mind that insect populations in that time frame are drastically reduced.

The conventional story tells that bugs on one's windshield were a feature of driving through rural landscapes in spring and summer. That is no longer true. Insect life is getting sparser. as is biodiversity in general.

We cannot afford to allow this trend to continue. I urge you to do the right thing, at least on county lands, to ensure that pollinators thrive.

Yours sincerely,

Ann Cooper
40 year naturalist and volunteer with Boulder County Open Space.

Hannah Brotherton

Comment #16

Longmont

Oct 11, 2021

I am writing to oppose the addition of GE Crops: Sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land. This updated allowance of these crops will have multiple negative effects on our county land and the environment as a whole. We know that these types of crops need to be sprayed by Roundup in order for them to successfully grown and we know that this is VERY harmful to pollinators and individuals surrounding the areas.

This also negatively impacts the overall health and diversity of our agriculture, which is contributing to climate change. As a mother of a young child, privileged enough to live in Boulder County, I strongly urge you to remove this portion of the policy. We cannot allow our policies to move back in time on issues a critical as this! Please protect the future generation and act boldly to move Boulder County into the future creating sustainable agriculture that will last generations!

THANK YOU!

Sue Anderson

Comment #15

Longmont

Oct 11, 2021

I would like to express my concerns about recommendations by staff to change the current County cropland policy. As someone with a small farm surrounded on three sides by Boulder County agricultural land, this recommendation could potentially have a direct impact on our farm, where we grow chemical free products including managed honeybees. We also plant a large amount of pollinator habitat to provide sustenance to native pollinators. I also represent People and Pollinators Action Network, an organization focused on finding solutions to pollinator health challenges.

Specifically, I am concerned about the apparent recommended reversal of the previous commissioners' recommendation to phase out the use of corn and sugar beet GMO crops on county agricultural land. The GMO's that we are discussing are so-called Roundup ready crops, meaning that they allow the Bayer/Monsanto product Roundup or similar formulations to be sprayed as an herbicide on the field while the crop is growing. While the issue for some is the presence of genetic engineering of any kind, the concern for me is the persistent use of Roundup/glyphosate or similar products when farmers plant Roundup ready crops. I also recognize that the GMO's of the future may allow for different chemical applications that are as yet unknown. While Roundup does not persist in the environment as long as previous generations of herbicidal chemicals, it can persist for as much as six months or more. It is also less toxic than chemicals that it replaced such as paraquat. But that does not mean it is entirely safe.

For the record, I am not opposed to genetically engineered crops across the board. For example, if companies can develop a drought resistant seed variety, that could make sense if there are not unintended consequences. Genetically engineering crops so that more chemicals can be applied to our food and to our livestock's food is problematic and does not make sense if pursuit of sustainable agricultural systems is a goal. Chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems and it is also a contributing factor to climate change.

RELATIONSHIP TO NEONICOTINOIDS

The vast majority of GMO seeds are automatically coated with neonicotinoids which you are thankfully continuing to phase out. While seed coatings are not considered a pesticide by the EPA, they certainly introduce systemic neonic insecticides into our soil, our water supply as they are water soluble and our ecosystem. As we know, neonics are systemic neurotoxins targeting insects. Many studies have shown that they cause widespread harm to non target invertebrates as well as increasing evidence is that they also harm vertebrates (including humans) through repeated long-term exposure. Those two recommendations (eliminating neonics and allowing GMO corn and sugar beets) seem somewhat at odds with each other. It is my understanding that seeds can be special ordered in advance to not have neonic coating, they are more expensive and that there is no guarantee that they are available. Perhaps this is old information but in conversations with seed purveyors, I have been told this. Phasing out neonics is the right thing to do, but so is phasing out these GMO's and it's very hard to separate the two.

HARM TO POLLINATORS AND MICROORGANISMS

A University of Texas study, among others, has shown that ingredients in Roundup harm the bee gut biome ultimately causing death. This has been shown to be true not only in European honeybees, but also in native bee species including several types of bumblebees. Other studies show that it affects the ability of insects to learn and to orient themselves. Additionally, there are ingredients in the product (adjuvants) that attract bees to it to make it even more toxic since it is an attractant. Finally, Roundup kills all plants that aren't Roundup ready, thus killing any habitat in agricultural fields that might be useful to bees, other pollinators or microbial activity.

Pollinators are needed for more than 75% of plant species and for agricultural and ecosystem health. Because inert ingredients are not disclosed in agricultural chemicals, it is not entirely clear whether the toxicity is from the active ingredient glyphosate, specifically from one of the inert ingredients or a synergistic effect of several ingredients. This is also the case in various tank mixes when Roundup is combined with foliar insecticides and fungicides – we simply do not have enough data about synergistic effects, but some studies on these mixes show that they are more toxic together than each individual product alone. Regardless, studies have shown that the chemical formulation is harmful to pollinators.

HARM TO ECOSYSTEMS, AIR AND WATER

We know that soil isn't just clay, sand and silt. It is a living habitat of microorganisms above and below ground. Healthy soil is needed to grow healthy crops and as part of a strategy to sequester carbon, key to climate change mitigation. There is ample evidence that the repeated use of Roundup can cause superweeds, i.e. weeds that are resistant to it at current recommended usage levels so more and more needs to be used to be effective. The damage to microbial activity and above and below ground invertebrate populations can render the soil lifeless and unable to support plant growth without additional chemicals. Chemical runoff is not just herbicides, fungicides, insecticides in seed coatings or foliar sprays, but all the adjuvants/inert ingredients that can contaminate our water and can drift to surrounding areas - like passive smoke harming those that are not smoking themselves.

HARM TO HUMANS

Harm to humans of glyphosate exposure is coming into clearer focus. The WHO has labeled it a probable carcinogen. Links have been made to non-hodgkin lymphoma and Parkinson's and some studies in lab animals have shown that the chemical may have reproductive effects at levels considered acceptable by the U.S. Environmental Protection Agency.

There are serious greenhouse gas and social justice footprint issues with chemical agriculture overall. Fertilizer is made with natural gas and uses a significant portion of the world's natural gas supply. Pesticides are petrochemicals with the same issues and footprints as any fuel

(extraction, transport, refining, transport) with environmental harm, leaks affecting both water and air quality, GHG emissions and harm to frontline and often marginalized communities and workers at every step along the way. These are significant environmental justice issues caused by the chemical agricultural system as well as major environmental issues BEFORE the products are even applied in the field where farmworkers and farmers receive the most exposure.

Since the phase-out was initially imposed, more has happened relative to this specific product:

1. Several high dollar lawsuits have been ruled in favor of the plaintiffs. As juries hear the data about the harm of glyphosate already known to scientists AND to the company, plaintiffs win.
2. Roundup has been banned or restricted in many countries and over 150 US cities.

3. Bayer/Monsanto is taking current versions of the product, containing glyphosate, off retail shelves for residential use as of 2023. There's a reason for that.

BOULDER COUNTY CAN SET AN EXAMPLE!

Here in Boulder County, we should be on the cutting edge of promoting true regenerative agriculture, not going backwards. Agriculture that is truly regenerative to our ecosystems and sustainable is a system that moves away from chemically based farming, among other practices. The carbon footprint of chemical farming has to include the footprint of chemical manufacturing which is quite high, as well as the detrimental effect on soils which are needed to sequester carbon. It is not just a question of whether a farmer does or does not till the soil.

I understand that it is economically challenging for the farmers involved. Often farmers are locked into contracts with chemical agriculture companies that make it hard to make a change. We should be helping them make that transition if they are willing. If they are not willing, then why are they still farming on our public open space? I realize that county staff as well as Mad Ag have worked with farmers to find solutions and this takes time. I appreciate these efforts, yet this conversation has been going on for a decade now with different policy changes along the way. The phaseout needs to continue.

Why do an annual soil conference where you bring in speakers to talk about soil health? I have attended nearly all of these conferences over the years and have appreciated the information I've gained there. Many times, speakers have talked about the negative effects of chemical agriculture on soil and biodiversity and outlined alternative strategies. Yet we still allow farmers leasing our public lands to do the opposite of what the speakers recommend. That doesn't make sense. If one of the ag open space goals is to promote soil health, then let's really do that and make that investment not just in words, but in action and more serious investment. The county's sustainability tax is being used often for this purpose, but there have to be other ways to do this and make it economically viable for the farmers.

While it may seem like it isn't possible to make this transition, there are examples across the country that it is indeed possible, especially on the small and medium scale of farms such as we have in Boulder County. If your hired consultant hasn't been successful and your staff cannot or will not implement the policy, it does not mean that it is not possible. I believe it is. Set an example as we are doing in other areas related to environmental policy such as climate change. Keep phasing out Roundup ready GMO's and neonicotinoids. Keep promoting soil health and really promote and invest in a full array of regenerative agricultural practices. Thank you.

Margaret Donharl

Boulder

Oct 11, 2021

Regarding # 3.GE Crops: The GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land.

The last version of the policy, which was adopted in 2017 phased out and ultimately banned the use of GE corn and sugar beets on county owned agricultural land.

Comment #14

Please do not reverse that ban. Chemically based agriculture negatively impacts biodiversity at both micro and macro level. Roundup creates a very unhealthy soil, contributes to climate change, has been shown to harm bees and humans, and to create unhealthy runoff. If Boulder County Parks & Open Space's vision is to be a national leader in sustainable agriculture, it makes no sense to include Roundup in that vision.

No Roundup on Boulder's cropland.

Thank you.

Virginia Winter

Comment #13

Boulder

Oct 11, 2021

I have a huge concern about the following updated staff recommendation: "GE Crops: The GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land." Since GE crops are largely Roundup ready crops, I oppose this recommendation. Two reasons why I oppose this recommendation:

Chemically based agriculture negatively impacts biodiversity at both micro and macro levels needed for healthy farms and ecosystems and it is also a contributing factor to climate change. I feel if we allow this we'll be working against multiple other County sustainability principles.

The chemicals in Roundup, including the inert ingredients, have been shown to harm bees of all kinds by harming their gut biome as well as reproductive systems. Pollinator health is one of my personal top concerns. Please do not allow GE crops on BCPOS ag land.

Gabriele Paul

Comment #12

Lafayette

Oct 11, 2021

I am strongly opposed to the planting of GMO crops on Boulder County Land and the associated spraying of Roundup. The chemicals in Roundup are known to be harmful to humans and wildlife. I support transitioning all cropland in Boulder County to organic practices.

Jennifer Stewart

Comment #11

Nederland

Oct 10, 2021

I am opposed to the use of GMO's and neonicotinoid pesticides on any public land in Boulder County, or in the State of Colorado.

Annal Markovich

Comment #10

Anyii Markevich*Nederland*

Oct 09, 2021

Over the last decade Boulder County constituents have on many occasions expressed their wish to ban GMO seeds and their associated toxic chemicals on public land.

GMO plants are designed to be used in combination with herbicides, pesticides and fertilizers that decrease biodiversity, pollute our waterways, and acidify and deplete the soil. This approach to agriculture is not sustainable, does not sequester carbon, and it is an insult to our community.

The Boulder County Agriculture Department currently does not work for the health of our planet and our community and does not seriously address our climate crisis. Please, Boulder County Commissioners, educate and hire employees who are dedicated to regenerative agriculture principles and ban GMO seeds and their associated toxic chemicals on public land.

COMMENT #9

Alex Markevich*Nederland*

Oct 09, 2021

Several years ago Boulder County commissioners promised the residents of Boulder County that agriculture on Boulder County Open Space would be transitioned to organic practices. Why has this transition not been completed? Why are GE crops still allowed?

Boulder County commissioners need to insure that the various departments entrusted with management of Open Space are staffed by leaders and teams that actually know how to manage a rapid transition to regenerative, organic practices. This applies both to agriculture and to weed control.

COMMENT #8

Christel Markevich*Nederland*

Oct 09, 2021

Over the last decade Boulder County constituents expressed on many occasions their wish to ban GMO seeds and their associated toxic chemicals on public land.

The negative impacts of GMO seeds on the seed bank is a worldwide concern. GMO plants require the use of herbicides, pesticides and fertilizers that decrease the biodiversity, pollute our waterways, and acidify and deplete the soil. This approach is not sustainable, does not sequester carbon, and it is an insult to our community.

The Boulder County Agriculture Department currently does not work for the health of our planet and our community and does not seriously address our climate crisis. Please, Boulder County Commissioners. educate and hire employees who are dedicated to regenerative agriculture

...commissioners, educate and hire employees who are dedicated to regenerative agriculture principles and ban GMO seeds and their associated toxic chemicals on public land.

Christel Markevich

Josie Gilmore

Comment #7

Englewood

Oct 07, 2021

The allowance of GE crops is upsetting to see, as roundup-ready plants are extremely harmful to both people and the environment. I strongly hope Boulder makes the right decision to support the future of Regenerative Agriculture.

Tom Andrews

Comment #6

Pagosa Springs

Oct 06, 2021

Thanks for the opportunity to comment.

Until recently my wife and I had been residents of Boulder County for over 30 years, and are currently planning to return soon to live out the rest of our lives in Boulder County. Both of us have spent a number of years working as small scale organic farmers in Boulder County, selling at the Boulder Farmers Market and to local grocery stores.

I highly recommend that Boulder County seriously consider a requirement that all of its agricultural lands be converted to organic farming practices as soon as possible. By converting to organic farming Boulder County would protect the health and safety of its citizens from harmful pesticide and herbicide exposure, protect the long term health of soils, achieve county goals of sustainable agriculture, and help set a national standard for the farming of public lands.

For a significant portion of Boulder County agricultural lands, a conversion to organic farming would require a change in farming practices and equipment, a change in the crops being grown, and potentially a change in the farmers leasing these lands. Any displaced conventional farmers who can't shift to organic crops, should be compensated for their financial losses. First, however, willing conventional farmers should be provided with training and expertise to make a transition to organic practices, as well as significant financial assistance to find local markets for their organic crops, acquire needed equipment, hire needed labor, etc. Collaboration with all local grocery stores and food chains would also be necessary, as well as some assistance to keep food prices stable. The short term costs of this transition would be more than compensated for by the long term benefits.

One of the important benefits of a conversion to organic farming would be the greatly increased availability of organic food to local residents and an increase in regional food sustainability. The current inability of the national trucking industry to supply adequate food and other goods to meet national demands (thus price hikes) should serve as a cautionary tale in these considerations. In these times of economic and political uncertainty, regional sustainability takes

on new meaning.

Sincerely,

Tom Andrews

Janice Brown

Comment #5

Englewood

Oct 05, 2021

No GMOs. Most of them have been treated with Round-up and contain glyphosate!

Jane Wulff

Comment #4

Longmont

Oct 03, 2021

Please do NOT allow gmo crops to be crown on open space land.

Do your research on how they affect the body and the environment.

Thank you.

Shirley Goff

Comment #3

Longmont

Oct 02, 2021

Please continue the policy of trying to reduce the amount of GMO Roundup ready crops grown. There are several examples of successful area farms that do not use the GMO seeds. Thank you.

Mary Rogers

Comment #2

Boulder

Oct 01, 2021

I am concerned about Item 3 in the Summary of Recommendations: "GE Crops: The GE sugar beet and corn varieties authorized in Section 6 of the 2012 Cropland Policy can be grown on BCPOS agricultural land."

This seems to contradict the June 3, 2019 – Amended Transition Plan Approved where the Commissioners "adopted a revised transition plan for phasing out genetically-engineered (GE) crops on county open space agricultural lands. The newly adopted plan changes the 2016-approved GE phase-out timeline by providing a two-year extension on the ban of GE corn (through 2021), a four-year extension on the ban of GE sugar beets (through 2025) . . ." and requested "that staff work to develop incentives for GE tenant farmers to phase out their GE crops and use of pesticides sooner."

Can you please clarify what's going on with GE crops. Taxpayers who have paid for County Open

can you please clarify what is going on with the crop company and how they have paid for County Open Space did not expect that these lands would become testing grounds for GE crops and we have long protested this use and have been promised that it would end. I hope staff is not trying to avoid this obligation.

Mike Chiropolos

Comment #1

Boulder

Sep 30, 2021

In 2020 I wrote BCPOS and the County Commission advising the need update to Cropland Policy reflect Appendix 10, Wildlife BMPs. I don't believe this has been done, and have not seen a proposal in my initial review of the draft recommended changes.

Appendix 10 should be reviewed and incorporated into the updated Cropland Policy. To allow public comment, an initial proposal should be circulated and posted prior to the public hearing. If more time is needed to finalize Wildlife BMPs, BCPOS should commit to developing BMPs by a date certain, such as March 31 or July 31, 2022.

Either a staff task force or staff/county/public stakeholder working group might be tasked with developing initial recommendations.

Here's the referenced Appendix:

2) Appendix 10 at page 55 of Cropland Policy:
Appendix 10: Wildlife Best Management Practices

Wildlife Best Management Practices for Cropland

This document is meant to serve as general outline for inclusion into the Draft Cropland Policy. This document will be further refined to include specific recommendations and mitigations pending full acceptance and approval of the Cropland Policy by the Board of County Commissioners.

Overview

The following Best Management Practices (BMP) are general guidelines for the protection of wildlife found on agriculture-focused Open Space properties. These BMPs have been developed for a broad geographic area, therefore each described BMP will not always be the most applicable. However, BMPs provide a foundation for developing customized leases, operating plans, and/or management plans that benefit designated priority species at the Federal, State or County level.

BMP Development Process

These wildlife BMPs for cropland will be further developed using literature review, State, Federal, and nonprofit published guidelines. and technical reports. All BMPs will be developed in

and non-profit partners, gardeners, and technical expertise will be developed in collaboration between Resource Management and Agricultural Resource staff. This is a living document which reflects the most current knowledge and information available and will be continuously updated.