



December 14, 2020

Ventura County Board of Supervisors
800 S. Victoria Avenue
Ventura, CA 93009-1740

RE: **Agenda Item #57:** Proposed Hemp Cultivation Ordinance

Dear Chair Long and Honorable Members of the Board:

Thank you for the opportunity to comment on the proposed ordinance to regulate hemp cultivation in Ventura County.

A significant component of the Ventura County 2040 General Plan is the Save Open Space and Agricultural Resources (SOAR) initiative. SOAR recognizes that "for agriculture to be sustainable in Ventura County, it must remain economically viable" and mandates that the County "promote the economic viability of agricultural lands by assisting agricultural producers and establishing zoning policies that support long term investment in agriculture" as a method of reducing the conversion of agricultural lands to non-agricultural uses.

In recent years, the County has failed its mandate. According to the Ventura County Annual Crop Report, agricultural gross receipts in the County fell by 9% between 2015 and 2019. And gross receipts do not consider the cost of farming operations. These costs include the cost of irrigation water, labor, taxes, local permit fees and expenses, supplies, and equipment – and have been increasing each year substantially.

No industry – not even agriculture - can survive on just the "good wishes" of government. Survival requires commercial and economic viability. Farmers must be allowed to seek out and cultivate legal crops that will support their increasing operational costs, including industrial hemp.

In January 2020, the County enacted an interim urgency ordinance that created a temporary ½-mile buffer from city-zoned residential areas, residential areas in the unincorporated area, and schools for the outdoor planting of industrial hemp. The interim ordinance banned industrial hemp cultivation from nearly 40% of the total available irrigated land in Ventura County. The "total available irrigated acreage" includes areas of existing orchards and more valuable row crops (such as berries), as well as areas where the

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topography does not allow for commercial hemp cultivation. The actual impact of the ½-mile buffer restrictions was far more significant than the raw numbers initially suggested.

The restrictions established by the interim urgency ordinance knocked local industrial hemp cultivation flat. In the 2019 Crop Report issued by the Agricultural Commissioner, industrial hemp was listed as the 10th highest revenue-generating crop in Ventura County, with gross revenues of \$34,460,000. In the 2020 Crop Report (to be issued in Summer 2021), industrial hemp will not appear on the list of top revenue-generating crops.

At public hearings in 2019 and 2020, some commenters questioned why hemp cultivation was necessary and wise in Ventura County. Hemp has unique growing requirements that lend itself to being a valuable "rotational" crop for our local agricultural industry. Hemp uses less than half the water of other row crops (some estimates suggest about 0.8 acre-feet of water/acre/growing season). With the looming challenges under the Sustainable Groundwater Management Act that will reduce irrigation allocation in the Oxnard and Pleasant Valley Basins by 40% over the next 20 years, hemp cultivation may be the alternative to fallowing land during times of increased water restrictions.

The Agricultural Commissioner's December 15, 2020 staff report presents the Board with two alternative versions to consider for recommended buffers as part of the permanent hemp cultivation ordinance. Alternative 1 would maintain the ½-mile buffer established under the January 2020 interim urgency ordinance. As discussed above, the restrictions in Alternative 1 have resulted in a near-complete ban on industrial hemp cultivation in Ventura County and will prevent this valuable crop from being cultivated on a commercial scale in the future.

Alternative 2 recommends a ¼-mile buffer from actual sensitive receptors (houses, schools, universities, and licensed daycare centers), combined with a restriction prohibiting hemp cultivation in the Tierra Rejada Valley. The staff report states that Alternative 2 "will be sufficient to avoid the unreasonable odor impacts." Alternative No. 2 mitigates the 2019 odor complaints and concerns expressed by residents – while still allowing future industrial hemp cultivation in Ventura County. It is a reasonable alternative and compromise that also is more aligned with the County's mandates in SOAR.

We urge the Board to support Alternative 2 (1/4-mile buffer with the Tierra Rejada Valley cultivation prohibition) and allow for the possibility of future industrial hemp cultivation in Ventura County.

Sincerely,



Louise Lampara
Executive Director