



916 Anacapa Street

Santa Barbara, CA 93101

January 23, 2022

Santa Barbara County Board of Supervisors

105 E. Anapamu Street

Santa Barbara, CA 93101

**RE: BOS Hearing of 1/25/22; D-3: Ordinance Regulating Hemp**

Dear Chair Williams and Members of the Board:

Citizens Planning Association has, for decades, participated in the development of ordinances, processes and policies advocating for careful community planning and environmental protection throughout Santa Barbara County. In addition, we consistently urge the greatest transparency and community engagement in development of County or City ordinances, regulations or plans. Thus, we are surprised to see the proposed ordinance before you today regarding hemp. We believe careful planning, environmental protection, transparency and community engagement are all lacking in this draft ordinance and in the process that went into its development.

CPA agrees with many of the concerns cited in the Coalition for Responsible Cannabis letter. We urge your Board to direct staff, from the Ag Commissioner's office and Planning and Development, to initiate a process that truly engages the community and studies the impacts of industrial hemp before adopting an ordinance.

We strongly disagree with your staff's assertion that these regulations are exempt from CEQA because in no way can it be "*seen with certainty that there is no possibility that these actions will have a significant effect on the environment*". Nothing could be further from the truth; hence, the exemption from CEQA does not apply. Coastal Commission certification should also be sought as impacts in the Coastal zone must be addressed.

The past five years of unlimited cannabis cultivation in Santa Barbara County have irreversibly altered the landscape in all regions of the County and greatly altered visual resources and air quality amid a multitude of other impacts. We implore you to take a pause before exacerbating those impacts with the ordinance before you today, which would open the door to unlimited hemp cultivation. Like cannabis, our County would, once again, be alone in such absence of limits.

A quick look at neighboring counties reveals a sampling of land use ordinances limiting hemp in various ways:

- **San Luis Obispo County:** among other restrictions, bans outdoor cultivation in Rural residential zones; **requires cultivation sites to be 400 acres** or larger, and be **at least 2000’ from ALL adjacent property lines.**  
<https://www.slocounty.ca.gov/Departments/Agriculture-Weights-and-Measures/Industrial-Hemp.aspx>
- **Ventura County:** restricts hemp within 1200’ of “sensitive sites” and sensitive sites include areas within “urban-community” general plan areas; requires a site security plan; misc other restrictions; <https://cdn.ventura.org/wp-content/uploads/2021/07/Ventura-County-Hemp-Ordinance.pdf>
- **Monterey County:** establishes industrial hemp “districts” with multiple restrictions; all outside of coastal zone; must be **THREE MILES** from existing cannabis cultivation site. <https://www.co.monterey.ca.us/home/showpublisheddocument/82260/637043935304900000>

We offer those examples just to reinforce the necessity of directing staff to carefully study the land use and community impacts of hemp cultivation and to engage the community before adopting an ordinance.

Sincerely,

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Marell Brooks, President

Citizens Planning Association