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Sent: Tuesday, May 16, 2017 9:47 AM
To: adam crawford <adam.crawford@state.or.us>
Subject: HB 2198-20 amendments testimony, please forward to committee

Memo: Supporting HB 2198 -20 amendments
To: The Joint Committee on Marijuana Regulation
From: John Sajo, Director of the Umpqua Cannabis Association

Thank you for the opportunity to discuss the regulation of marijuana once again. I strongly urge you to pass the -20 amendments to 2198. On May 8, 2017 the OMMP issued Medical Marijuana Information bulletin 2017-04. This included language that will deny medical marijuana to hundreds of patients, many of whom have been registered with the program for years, solely because they live in a remote rural area.

The bulletin states:

“Patients who designate a grower must provide the address of the grow site. The address being provided must include a street number and name. The OMMP will no longer accept other property identifiers such as P.O. Boxes, tax lot numbers, map numbers, longitude and latitude, townships or GPS coordinates as a grow site address.”

The problem is that many residences in remote rural areas do not have street numbers and names. Some of the patients that reside in such areas may be able to obtain street numbers and names but only after a complicated expensive time consuming process. Most patients who are affected by this bulletin will never be able to obtain a street name and number for a variety of reasons. These patients will be denied the ability to produce medicine for themselves simply because they live in a remote area. This is completely unfair and unjust and should be reversed.

Why are rural residents being singled out by this new rule?

I personally asked Andre Ourso, manager of the OMMP, if I could register a grow site on a rural parcel I own using the legal description of the parcel. I did so because I have been repeatedly asked by patients if I would allow them to have a garden on my property after they lost their grower due to the many rule changes that have adversely affected the OMMP system. I was told that the legal description was a valid address. I recently received the grow site placard from OMMP for one such patient indicating that it expires April 12, 2018. I invested a significant amount of money to develop a garden site at that location and now I am informed that this is no longer a valid address.

Why is the legal description not adequate? Why are GPS coordinates not acceptable? In remote areas and on a parcel with significant acreage, the GPS coordinates are the most precise way of identifying the location of the garden. They identify the location to within a few feet on a parcel that might be ¼ mile or more long.

Given that HB 1057 now requires OMMP gardens to be tracked by the OLCC seed to sale tracking system and be subject to inspections, what is wrong with registering an address with a precise legal description of other identifier?

The policy articulated in this bulletin makes no sense. The remote rural parcels singled out for exclusion are exactly where marijuana gardens can be located without offending neighbors. Why adopt a policy that prohibits gardens on locations with few neighbors, when that will force gardens into more densely populated areas where some neighbors may be bothered. The recent testimony from Deschutes county residents concerned about neighboring cannabis farms should highlight this problem.

Many patients live in remote areas. Many are low income and strive for self reliance and will be unable to afford to purchase their medicine at dispensaries which are a considerable distance away. Depriving these patients of the ability to produce their own medicine by arbitrary rules is unjustified and cruel.

Forcing more gardens into more densely populated areas will just create more problems. Please pass the 2198-20 amendments to fix this.

Thank you
John Sajo, director Umpqua Cannabis Association
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