

From: [Lorianne Carey](#)
To: [Exhibits HAGLU](#)
Subject: HB4051/HB4072/HB4158-Submitted Testimony
Date: Wednesday, February 5, 2020 12:21:58 PM
Attachments: [Williams Valley Audit.docx](#)

Dear Chair Clem, Vice Chairs McLain and Post and Members of the House Committee on Agriculture and Land Use~

I thank you in advance for your time and consideration. I am writing to you as you will be taking into account HB's 4051/4072 and 4158 all having to do with hemp in Oregon. I am a 30-year resident of Josephine County where over 30% of the permitted acreage of hemp was grown in 2019.

First of all, I would like to make absolutely clear that hemp is NOT LIKE "every other crop" in Oregon, as it is being used to foil the METRC "seed-to-sale" tracking system the OLCC and OMMP programs must use. No other legal crop can turn into a Schedule One drug IN THE FIELD and no other crop looks like (and is indistinguishable from) HIGH-GRADE THC. Law enforcement cannot tell the difference and the ODA has NO MANDATORY SAMPLING AND TESTING. It is only IF a grower calls for laboratory sampling that this takes place. Growers planted hundreds, if not thousands, of acres of high-grade THC under an easily obtained ODA hemp permit and never called for sampling. Then they sold their THC on the unregulated ("black") market, rendering METRC tracking completely useless. In no uncertain terms, the ODA's hemp program makes a mockery of the State's and OLCC's efforts to squelch the unregulated THC Cannabis market. This is cause for serious concern and MUST be changed with MANDATORY sampling and testing of ALL hemp sites and acreage.

The ODA's hemp program is weak at best and the Agency put the cart WAY ahead of the "horse" by issuing permits to grow over 60,000 acres of a crop they have very little information on. Water theft was of epic proportion (over 80% of permitted acres were irrigating illegally-see attached "Williams Water Audit), yet we are encouraged with ODA funding a full-time Regional Water Master under OWRD so that this season there will (hopefully) be a better grasp on the illegal irrigation. A small step in the right direction.

Currently, the biggest issue the ODA is woefully unprepared to address is CROSS-POLLINATION of hemp with the OLCC's and OMMP's LEGAL THC crops. This airborne pollen renders THC Cannabis virtually useless with seeds. I am sure you are well-aware of Oregon's Recreational Marijuana program and the millions of tax-dollars it generates for the State. When I listen to testimonies from the ODA and OSU, it seems as though they think they exist in a bubble, with no care or concern for the State's Recreational and Medical programs. To be absolutely clear, the ODA has NO pollen-mitigation requirements, and basically has NO pollen-drift information to base any solid policy on. It is widely accepted that hemp pollen can travel WELL OVER 3 miles and perhaps as far-as 20+ miles!!! This is substantially more than a "neighbor-to-neighbor" issue!!! A friend of mine who has a Licensed OLCC farm had OSU Extension "pin" her farm on a GIS map. She had over 140 (!!!) hemp grows within 5 miles this season!! How can the State welcome investors and an industry to Oregon to the tune of BILLIONS of dollars of investments to have the reckless ODA permitting unlimited acreage of a crop that will RUIN the OLCC's products??? Much-less undermine the METRC tracking and security requirements these farms have in-place????

I have major concerns when I listen to the ODA's Lauren Henderson say that the ODA will be deferring to OSU and their "Global Hemp Innovation Center" for cross-pollination information. This is a HUGE CONFLICT-OF-INTEREST as OSU's Professor Noeller has made absolutely clear in his testimonies that this "Center" is intent on courting foreign investors, most notably from China. OSU 's positions on Industrial hemp and open-pollination in Oregon are reckless and again, as though there isn't a viable, legal, TAX GENERATING and TRACKED THC program in Oregon!!! Please do NOT allow ODA to defer to OSU on the huge issue of cross-pollination!!! This is a dangerous and slippery slope!!!

I would be asking some very hard questions of the ODA, most notably: What % of 2019's 60,000+ permitted acres were actually TESTED and what % of those acres tested were ACTUALLY HEMP below .3% THC? I would hazard a guess that this crop was actually an abysmal failure and waste of Oregon's precious natural resources-soil and water chiefly. Is Oregon's goal to produce an export crop to China-where all the "value added" in processing takes place, leaving Oregon farmers at a LOSS?? I challenge you to take a broader look at the GOALS of growing hemp in Oregon. Farmers are NOT "getting rich" with this "new" crop and I would be asking the ODA for HARD DATA (which I doubt they even have) on the "success" of this crop.

There are other major concerns regarding hemp in Oregon, notably the lack of BMP'S for agronomic practices as most of those 60,000+ acres were COVERED IN PLASTIC to be disposed of after one season!!!! The ODA has very little data on PESTS that were rampant last season, causing untold losses to the OLCC industry and the need for toxic pesticides on thousands of acres. Again, their lack of knowledge is dangerous and harmful to ALL residents of Oregon.

There are a LOT of reasons there is NO HEMP in most all of California's Counties!!! I encourage you to look into the myriad reasons that State's Counties have OPTED-OUT of hemp!!!! Listen to their concerns because this is all relevant to Oregon!!

I have major concerns with the USDA's "Interim Rules" for hemp. As Oregon attempts to have it's program in-line with the USDA's parameters, the bottom line is "ADEQUATE RESOURCES TO ADMINISTER". The State must PROVE this and Oregon does NOT have the resources to administer this program!! Under the USDA, the sampling and testing of hemp is to be undertaken by LOCAL LAW ENFORCEMENT!?! There is NO WAY (for instance) the Josephine County Sheriff has any intention or resources to do this important part of the program! We don't even have 24-hour PATROL.....there is NO WAY local law enforcement can take-on this required task. What now???

I urge you to take a hard and honest look at the ODA's hemp program and what will need to be included in this session's Bills to address some of these serious issues!!! This program is by NO MEANS (yet) a "success" and needs to be reeled-in!!! With hemp being used as a foil for growing THC unregulated, I think that is a good place to start. Cross-pollination cannot go unabated and unaddressed. And the list goes on.....

Thank you sincerely for your time!! Wishing you much insight as you take these issues into serious consideration!

Very Sincerely~

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Williams Valley Audit: Industrial Hemp Permits

886.43 TOTAL ACRES PERMITTED

Of 40 permitted sites:

8 have NO IRRIGATION RIGHTS=20%

2 have “no address in the County GIS”=5%

2 “need transfer to be legal”=5%

TOTAL OF 30% WITH NO IRRIGATION RIGHTS

Only 8 of 40 sites **ARE WITHIN THEIR LEGAL IRRIGATION RIGHTS=20%**

**OVER-ALLOCATION OF PERMITTED ACREAGE
VS.IRRIGATION RIGHTS:**

356.57 ACRES=40%

ZONING BREAKDOWN:

RR5-15 SITES=37.5%

EFU-12 SITES-30%

WR-7 SITES=17%

FR-4 SITES=10%

RI-2 SITES=5%