

From: Nathan Howard [<mailto:nathan@eastforkcultivars.com>]
Sent: Thursday, July 30, 2020 9:07 PM
To: SOS Irrlistnotifier * SOS <Irrlistnotifier.SOS@oregon.gov>
Subject: IP 34 Public Comment On Fiscal Estimate

Greetings,

I write to comment on the draft Fiscal Estimate for IP 34

As someone that has participated in the complicated regulatory scheme created by Measure 91 as a licensed cannabis producer, I am intimate with the demands and needs of running that industry.

And, as someone that has closely watched the discussion around regulated psilocybin therapy and understand its limited scope (and, to be honest, the limited ability for producers like me to participate), I was surprised to see the Fiscal Estimate Committee develop such a high fiscal estimate for IP 34's two year development period.

IP 34 is a modest proposal, that will have hundreds — not thousands — of licenses for facilitators and maybe only dozens of licenses for producers. It will not have a multitude of products, or “strains”, or gummies, or baked goods or any of the other products that were a part of implementing marijuana legalization. Because psilocybin remains illegal under IP 34, fewer people will access it and the therapeutic community that will grow around the measure, once passed, will be small.

I think the current estimate for IP 34's fiscal impact is overstated, and it should be revised downward to more accurately reflect the creation of this program. It's likely too high by a factor of three or four — and request the committee reduce it accordingly.

Sincerely,
Nathan Howard

OLCC Producer
Vice Chair of the Board of Directors, Oregon Cannabis Association
Founding Board Member, Craft Cannabis Alliance