

Illegal Marijuana Market Enforcement Grant Program Report

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Oregon Criminal Justice Commission

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The mission of the Oregon Criminal Justice Commission is to improve the legitimacy, efficiency, and effectiveness of state and local criminal justice systems.

Acknowledgements

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Executive Summary

The Criminal Justice Commission (CJC) has administered the Illegal Marijuana Market Enforcement Grant since 2018 and is required to issue an annual report concerning the status and effectiveness of the program and to provide future funding recommendations to the Oregon Legislature (legislature).

This report examines the status of the grant program and grantee expenditures from 2021 through September 30, 2024. In an effort to standardize annual reporting moving forward, grantee program data is presented primarily for the reporting period of October 1, 2023, to September 30, 2024.

The key findings described in detail in this report include:

- Two hundred and forty-one incidents were reported by law enforcement grantees from October 1, 2023, to September 30, 2024. Mapping incidents by zip code and first year an incident was reported in that zip code indicates that incidents are becoming more geographically distributed each year.
- Three zip codes have seen more than 30 incidents involving grant-funded law enforcement activities from 2022 to 2024. The three zip codes with the highest cumulative number of incidents are 97523 (the greater Cave Junction area, with 42 incidents), 97504 (the eastern side of Medford, with 38 incidents), and 97537 (Rouge River, with 34 incidents).
- Five hundred and sixty-three survivors sought assistance from CBO grantees during the reporting period, and 428 (76 percent) received services. The majority sought legal assistance for wage claims (87 percent) and employer criminal conduct/violence (30 percent). Financial assistance (23 percent) was the most frequently requested type of humanitarian aid.
- Of the 241 reported incidents, 34 percent involved a land, natural resource, or civil code violation.
- Law enforcement grantees seized approximately 433,285 illegal cannabis plants and 35,219 pounds of illegal processed cannabis, as well as other illegal narcotics and substances, firearms, and equipment used to operate illegal grows off-grid. Overall, reported seizures were significantly lower than in previous years.

Based on the best available information, the projected cost for existing grantees to maintain operations for two years at requested funding levels would require \$26,487,358. Expanding the grant program into new jurisdictions is estimated to cost an additional \$3.5 million, at minimum.

A copy of the full report is available online at <https://www.oregon.gov/cjc>, or by contacting the Criminal Justice Commission at (503) 378-4830.

TABLE OF CONTENTS

	Acknowledgements.....	1
1	Background.....	5
1.1	Legislation.....	5
2	Status of Funded Programs.....	5
2.1	2023 – 2025 Regular and Special Grant Cycle Grantees.....	5
2.2	Program Expenditures.....	7
2.2.1	Law Enforcement Program Expenditures.....	8
2.2.2	Community-Based Organization Program Expenditures.....	8
3	Program Effectiveness.....	9
3.1	Measuring Impact - Complexity of Quantifying Oregon’s Illegal Marijuana Market...	9
3.2	Program Data Tracking and Reporting Revisions.....	9
3.3	Data Discussion.....	10
3.3.1	Where Grant-Funded Interdictions Are Happening.....	10
3.3.2	Incident Identification and Response.....	12
3.3.3	Individuals Reported on Scene.....	13
3.3.4	Incidents Reported at Repeat Locations and/or Related to Larger Criminal Organizations.	13
3.3.5	Seizures Made During Law Enforcement Operations.....	14
3.3.6	Felony Cases Reported.....	15
3.3.7	Incident Case Examples.....	15
3.3.8	Occurrences of Human Trafficking Observed or Suspected.....	16
3.3.9	Services Provided by Community-Based Organization Programs.....	17
3.3.10	Grantee Collaboration with Other Agencies.....	19
4	Future Program Funding Projections.....	23
4.1	Projections for Funding Existing Programs.....	23
4.2	Projections for Funding Existing Grantees and Expanding the Grant Program to New Jurisdictions.....	24
4.3	Grantee Reporting on Unmet Resource Needs.....	24
	Appendix A: Expenditures by Grantee.....	26
	Appendix B: Illegal Cannabis Incidents by Zip Code.....	27
	Appendix C: Oregon Liquor and Cannabis Commission Harvest Data.....	30
	Appendix D: Oregon State Police Marijuana Team Statistics.....	32
	Appendix E: Oregon Liquor and Cannabis Commission Call Center Data.....	33
	Appendix F: Oregon Water Resource Department Law Enforcement Assists.....	35

LIST OF TABLES AND FIGURES

Table 2.1.1. Combined 2021 - 2025 Regular and Special Grant Cycle Awards.....	6
Figure 2.1.1. Map of Grant-Funded Program Areas.....	7
Figure 2.2.1. Combined 2021 - 2025 Grant Cycle Expenditures by Budget Category	7
Figure 3.3.1.1. Legal Marijuana Harvest by County	10
Figure 3.3.1.2. Map of Grantee Incident Density by Zip Code and Year of First Incident.....	11
Table 3.3.1.1. Zip Codes with the Highest Number of Incidents Reported, April 1, 2022 – September 30, 2024.....	12
Table 3.3.2.1. Incident Identification Source, January 1, 2024 – September 30, 2024.....	12
Table 3.3.2.2. Agency Staff Deployed per Incident.....	13
Table 3.3.2.3. Incidents with Multi-Agency Response, January 1, 2024 – September 30, 2024. 13	
Table 3.3.3.1. Individuals Reported On-scene, January 1, 2024 – September 30, 2024.....	13
Table 3.3.4.1. Incidents Reported at Repeat Locations and/or Related to Larger Criminal Organizations.....	14
Table 3.3.5.1. Seizures Reported During Law Enforcement Operations.....	14
Table 3.3.6.1. Grant-Related Felony Cases Reported	15
Table 3.3.8.1. Incidents with Observed or Suspected Human Trafficking.....	17
Table 3.3.9.1. CBO Sources of Human Trafficking Survivor Engagement.....	18
Table 3.3.9.2. Types of Services Needed.....	18
Table 3.3.9.3. Demographics of Human Trafficking Survivors.....	19
Figure 3.3.10.1.1. Map of Oregon State Police Marijuana Team Cases by County, January 1, 2023 – December 31, 2023	20
Table 3.3.10.1.1. Oregon State Police Marijuana Team Statistics, January 1, 2023 – December 31, 2023.....	20
Figure 3.3.10.2.1. Map of OLCC Call Center Inquiries Referred to Law Enforcement.....	21
Table 3.3.10.3.1. Incidents with Land, Natural Resource, and Civil Code Violations.....	22
Figure 3.3.10.3.1. Map of Oregon Water Resource Department Law Enforcement Assists	22
Table 4.1.1. Two-Year Funding Projection Based on Grantee-Requested Service Level.....	23
Table 4.1.2. Two-Year Funding Projection Based on Current Expenditure Levels.....	24
Table 4.2.1. Funding Projection to Include Program Expansion.....	24
Table A.1. Combined 2021 – 2025 Grant Cycle Expenditures as of September 30, 2024.....	26
Table B.1. All Zip Codes in which Law Enforcement Grantees Reported Cannabis Incidents... 27	
Table C.1. Legal Marijuana Harvest by County	30
Table C.2. Legal Marijuana Harvest by County and Producer Type.....	31
Table D.1. Oregon State Police Cases by County, January 1, 2023 – December 31, 2023.....	32
Table E.1. Oregon Liquor and Cannabis Commission Call Center Inquiries Referred to Law Enforcement.....	33
Table E.2. Oregon Liquor and Cannabis Commission Call Center Inquiries Referred to Law Enforcement by Type of Inquiry	33
Table E.3. Oregon Liquor and Cannabis Commission Call Center Inquiries Made by Law Enforcement.....	34
Table F.1. Oregon Water Resource Department Law Enforcement Assists.....	35

1 Background

1.1 Legislation

In 2014, Oregon voters approved Measure 91, a ballot measure that legalized the recreational use of marijuana under circumstances and in quantities regulated by the Oregon Liquor and Cannabis Commission (OLCC). Measure 91 began allowing legal possession of limited quantities of marijuana for adults 21 and older in 2015 and retail sales, via OLCC-licensed retailers, in 2016.

Despite legal avenues for purchases and sales of marijuana within Oregon, an illegal marijuana market continues to cause public safety concerns, including diversion of marijuana to other states, illegal cultivation of marijuana on private, state, and federal property, enrichment of organized criminal operations, severe environmental degradation, and the emergence of widespread coercive labor conditions, including labor trafficking, at illegal grow sites across Oregon.

Illegal market operations and associated labor trafficking remain challenging to investigate and prosecute, given difficulties in drawing empirical distinctions between legal and illegal cultivation and distribution, the industry's cash-heavy operations, workers coerced by threats of imminent personal or familial harm in dangerous, isolated conditions, and the long under-resourced public safety systems in some of the areas most impacted by illegal operations.

The Oregon Legislature created the Illegal Marijuana Market Enforcement Grant Program (IMMEGP) in 2018 to assist local law enforcement with addressing the illegal marijuana market in Oregon. Since that time, the Legislature has expanded the program to also fund disruption of illegal cannabis-related labor trafficking and worker abuse and supports and services for workers encountered. Units of local government, such as law enforcement agencies, and community-based organizations (CBOs) may receive funds through this program.

The Legislature funds this grant program with \$6 million on a biennial basis. In 2023, the Legislature supplemented the \$6 million in base funding by an additional \$5 million, for a total of \$11 million in biennial funds that were available in 2024.

2 Status of Funded Programs

2.1 2023 – 2025 Regular and Special Grant Cycle Grantees

During the 2023 - 2025 regular grant cycle, existing grantees had the opportunity to request funds to maintain and/or expand their IMMEGP programs to ensure they were operational until the end of the existing contract period, December 31, 2025. Nine grantees chose to request additional funds. Yamhill County, who had been operating as a subgrantee of Polk County, was awarded a direct contract, bringing the number of law enforcement grantees to eleven.

Funds were also made available to new applicants through an open solicitation. One CBO, Safety Compass, applied and was awarded. Approximately \$1,567,909 in funds remained unallocated after the solicitation was completed. In response to concerns from grantees and the IMMEGP Grant Review Committee about a potential decrease in 2025 – 2027 appropriations for this

program compared to recent biennia, the CJC Commission determined the unallocated funds will be made available as part of the next grant cycle through a competitive solicitation that will occur in 2025.

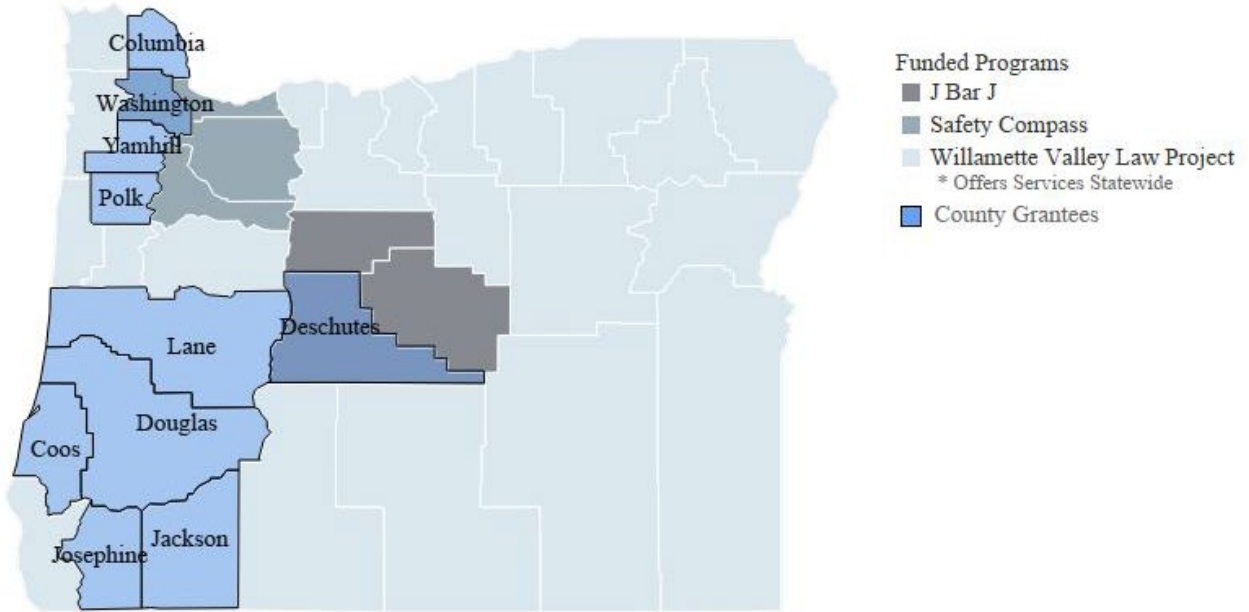
The 2023 - 2025 grant cycle awards were combined with funds awarded from 2021 – 2023 regular and special grant cycles under a single contract for each grantee reflecting the total funding amounts shown in Table 2.1.1. In total, the CJC has awarded \$41,082,091 in illegal cannabis interdiction funds. Grantees may spend funds through the end of 2025.

Table 2.1.1. Combined 2021 - 2025 Regular and Special Grant Cycle Awards

Organization	Grant Funds Awarded 2021-2023	2023 – 2025 Regular Cycle Grant Award	All Grant Funds Awarded
Columbia County	\$ 936,516.37	\$175,137.00	\$1,111,653.37
Coos County	\$ 223,214.30	\$582,906.00	\$806,120.30
Deschutes County	\$ 1,698,750.00	\$1,268,652.0	\$2,967,402.00
Douglas County	\$ 581,440.04	0	\$2,260,870.04
Jackson County	\$ 10,062,895.81	\$1,679,430.0	\$12,422,530.81
Josephine County	\$ 5,747,829.72	0	\$6,390,576.72
Klamath County	\$ 2,678,704.60	\$2,359,635.0	\$2,678,704.60
Lane County	\$ 1,927,601.08	0	\$2,903,483.08
Polk County	\$ 1,703,010.55	\$642,747.00	\$1,919,247.55
Washington County	\$ 90,037.52	---	\$358,258.52
Yamhill County	---	\$975,882.00	\$965,460.00
J Bar J Youth Services	\$ 390,000.00	\$216,237.00	\$390,000.00
Safety Compass	---	\$268,221.00	\$169,858.00
Willamette Valley Law Project	\$ 5,610,000.00	\$965,460.00 \$127,926.00	\$5,737,926.00
Total	\$ 31,650,000.00	\$ 9,432,091.00 \$169,858.00	\$ 41,082,091.00

Figure 2.1.1. provides a map of grant-funded program areas across Oregon. IMMEGP currently funds eleven law enforcement grantees, representing twelve counties and two cities, and three CBO grantees that collectively provide services to victims of human trafficking associated with illegal marijuana grows statewide.

Figure 2.1.1. Map of Grant-Funded Program Areas



2.2 Program Expenditures

Overall, 54 percent of the \$41,082,091 awarded has been expended as of September 30, 2024. Most grantees are maintaining ongoing costs at a relatively consistent rate each quarter. Columbia County has expended the highest percentage of their award to date (70 percent). Grantees who have the lowest expenditure rates include Yamhill County (25 percent) and Safety Compass (0 percent). Both grantees were awarded new contracts in mid-2024 and expenditure information is not yet available.

Figure 2.2.1. Combined 2021 - 2025 Grant Cycle Expenditures by Budget Category

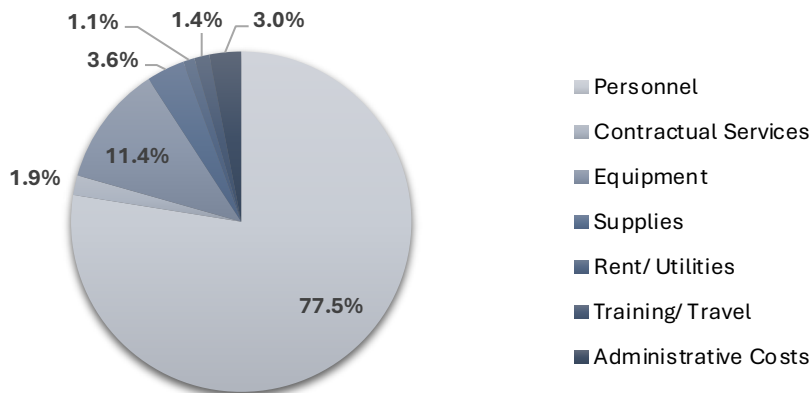


Figure 2.2.1. presents the breakdown of expenditures by budget category for all grantees. Most funds were expended on personnel (78 percent), and equipment (11 percent) during the reporting period.

2.2.1 Law Enforcement Program Expenditures

The grant program currently provides \$34.8 million in funding for law enforcement grantees. An analysis of personnel funds illustrates the varied expertise needed to successfully conduct illegal marijuana interdiction efforts. Law enforcement grantees employ a variety of sworn and non-sworn law enforcement personnel, county prosecutors, code enforcement officials, waste department and county counsel employees, evidence technicians, and administrative assistants. Detectives (47 percent), sergeants (12 percent) and code enforcement officials (five percent) are the positions supported most frequently by the grant program.

In addition to personnel needs, dismantling illegal marijuana grows creates many unexpected costs that law enforcement budgets often do not have capacity to maintain. Grant funds support the purchase of essential specialized equipment such as trucks and trailers for hauling and agricultural equipment used to destroy the large volume of plants and processed marijuana often encountered on-site. Expanded storage facilities are also frequently needed to store bulky items such as grow lights that are used as evidence in criminal cases. Compared to previous years, grantees expended a higher amount of funds on tools and technology purchases to support investigations, such as cameras, vehicle trackers, and a software program to aid with tracing crypto currency transactions on the dark web.

2.2.2 Community-Based Organization Program Expenditures

The grant program funds three CBO grantees, which supports eight CBOs across the state in their efforts to address the humanitarian issues tied to illegal marijuana cultivation and distribution. The first CBO grantee, the Willamette Valley Law Project (WVLP), is a consortium of six non-profits, including Raíces de Bienestar, Oregon Law Center, NW Workers' Justice Project, Únete, Centro de Servicios Para Campesinos, and Legal Aid Services of Oregon. Together, these nonprofits are providing comprehensive services to cannabis workers, as well as community prevention outreach and education. WVLP was awarded \$5.7 million to fund services personnel and direct aid supports, such as housing, food, transportation, emergency stipends, legal representation, and culturally specific mental health counseling for workers affected statewide by the humanitarian crisis associated with unlawful marijuana cultivation and distribution operations.

The second CBO grantee, JBarJ Youth Services (JBarJ), operates an anti-trafficking program serving Deschutes, Jefferson, and Crook counties. JBarJ was awarded \$390,000 to provide community education, crisis support, trained interpreters, long-term care management, support services, and temporary shelter and necessities to human trafficking survivors identified during investigations or through outreach.

The third CBO grantee, Safety Compass, was awarded \$169,858 to provide coordination and training to government and community partners that may encounter victims of labor trafficking, as well as direct services to victims including on-scene crisis response, safety planning, and referrals to additional resources. Safety Compass was awarded funds in mid-2024 and did not have sufficient time to start reporting expenditures as of the date of this report.

Overall, CBO grantees expended most personnel funds to support attorneys (24 percent), outreach positions (24 percent), paralegals (14 percent), and mental health clinicians (11 percent). During the reporting period, CBOs expended 31 percent of funds on non-personnel costs such as rent/utilities, and other operational costs. Notably, more than 31 percent of non-personnel funds were spent on humanitarian aid, which includes items such as clothing, food, housing, and hygiene supplies that survivors often do not have access to when escaping coercive labor trafficking conditions.

3 Program Effectiveness

3.1 Measuring Impact - Complexity of Quantifying Oregon’s Illegal Marijuana Market

The CJC is required to report on the effectiveness of the grant program in combating the illegal marijuana market in Oregon. Due to the clandestine nature of illegal markets, the distribution and scope of the illegal marijuana market in Oregon is not known, making it difficult to determine whether grant-funded activities result in a reduction of the black market and associated illegal activities. Much like legal markets, illegal markets evolve over time in response to changing conditions and consumer demand. A myriad of factors such as the emergence of new drug trafficking organizations, fluctuations in the volume and availability of legal marijuana, national drug policies, and even changing weather conditions may impact the behavior of illegal markets. Limited data on these associated factors and how much volatility is “normal” in Oregon’s illegal marijuana market further complicate efforts to measure the impact of grant activities.

The following sections present data on grantee activities that occurred during the reporting period. Data from partner agencies such as the OLCC, the Oregon Water Resources Department (OWRD), and the Oregon State Police (OSP) provide additional context for Oregon’s illegal marijuana market and information about co-occurring issues identified by grantees. The CJC reviewed the best data available, but more data is needed to conduct a causal analysis. It is not possible to draw conclusions about whether the grant has reduced Oregon’s illegal marijuana market at this time. However, the data does show that the program has supported a significant number of interdiction efforts across the state, resulted in the removal of millions of plants and hundreds of thousands of pounds of processed marijuana from the illegal market, and connected hundreds of victims of human trafficking associated with illegal grows with needed support services.

3.2 Program Data Tracking and Reporting Revisions

This report focuses on the reporting from existing and new law enforcement grantees for the period beginning October 1, 2023, through September 30, 2024. Data from partner agencies such as OLCC is for the same reporting period as for law enforcement grantees unless otherwise noted.

Several improvements were made during the first quarter of 2024 to the reporting form grantees use to submit incident data. The changes allow grantees to include more information such as the

source that identified the possible illegal grow for investigation, the total number of individuals encountered on scene during an incident, immediate actions taken by law enforcement against individuals determined to be criminally involved in the illegal grow, and other details. The reporting period for new data is January 1, 2024, to September 30, 2024, and is noted on the corresponding tables.

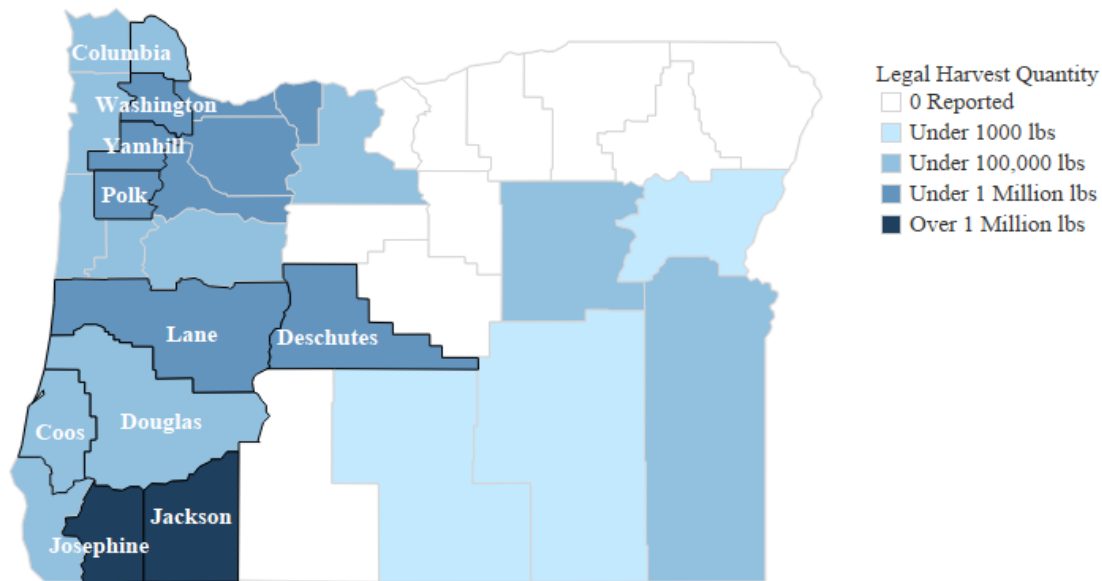
Grantees also submitted case narratives in quarterly and annual reports, published news releases about incidents, and provided select presentations to CJC staff on grant-funded activities. Informal interviews with grant-funded staff were conducted with all grantees during the fall of 2024. These qualitative data are also presented where relevant.

3.3 Data Discussion

3.3.1 Where Grant-Funded Interdictions Are Happening

Legal cannabis harvest data may help to identify which regions in Oregon are more conducive to growing cannabis and, therefore, more likely to be targeted for illegal grow operations. Figure 3.3.1.1 presents the quantity of legal harvest reported by county, with grantee counties identified. Based on OLCC harvest data, 82 percent of the legal marijuana harvest in Oregon was grown in grantee counties during the reporting period, indicating that funds were successfully distributed to areas where illegal grows are more likely to proliferate. Table C.1. in Appendix C provides OLCC legal marijuana harvest data by county.

Figure 3.3.1.1. Legal Marijuana Harvest by County¹



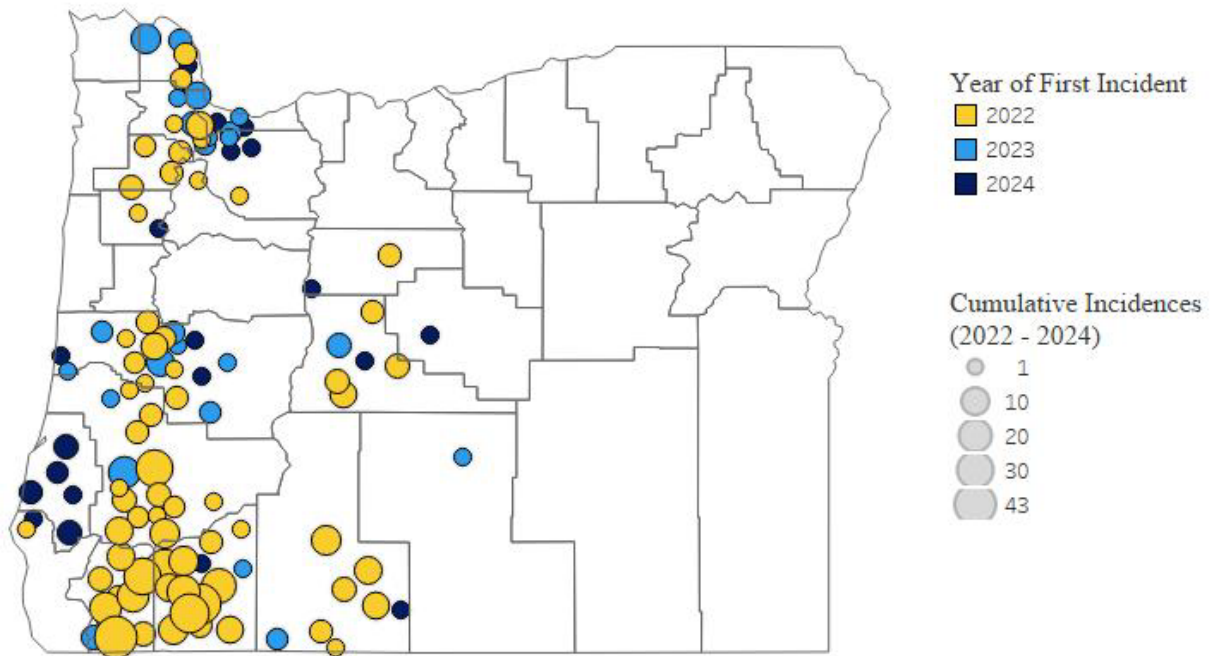
Grant-funded law enforcement operations include various connected activities that range from individual law enforcement officers intercepting parcels that are suspected of containing illegal

¹ Labeled counties receive grant funding.

marijuana to multi-agency teams eradicating large-scale illegal marijuana grow sites. For reporting purposes, all grant-funded actions are considered “incidents” and included in the totals presented in Figure 3.3.1.2 and Table 3.3.1.1.

Figure 3.3.1.2 compares law enforcement incidents reported from April 1, 2022, to September 30, 2024, by zip code and year of first incident. The number of reported incidents reported from October 1, 2023, to September 30, 2024, was 241, bringing the total number of incidents reported since 2022 to 665. Looking at the year of first incident for each zip code indicates incidents are becoming more geographically distributed every year.

Figure 3.3.1.2. Map of Grantee Incident Density by Zip Code and Year of First Incident



The incidents displayed in Figure 3.3.1.2 occurred in 129 unique zip codes and on one parcel of federal Bureau of Land Management land, where a precise zip code was unknown to investigators.

Table 3.3.1.1. provides a comparison of ten zip codes with the highest number of reported incidents from 2022 to 2024. More than 30 incidents were reported in three zip codes, including one zip code in Josephine County (97523, with 42 incidents), and two zip codes in Jackson County (97504, with 38 incidents and 97537 with 34 incidents). For a table displaying all reported incidents by zip code, see Table B.1. in Appendix B.

Table 3.3.1.1. Zip Codes with the Highest Number of Incidents Reported, April 1, 2022 – September 30, 2024

ZIP Code	Reported Incident Count	Counties Affected ²
97523	42	Josephine
97504	38	Jackson
97537	34	Jackson
97501	29	Jackson
97470	29	Douglas
97524	22	Jackson
97526	21	Josephine
97471	20	Douglas
97502	18	Jackson
97538	16	Douglas

3.3.2 Incident Identification and Response

Table 3.3.2.1 lists the identification source of incidents that occurred from January 1, 2024, to September 30, 2024. The majority (62 percent) of investigations into illegal grows were initiated based on identification by the IMMEGP-funded team. However, almost 30 percent of investigations begin due to a tip, highlighting the importance of law enforcement maintaining positive community relations and easily accessible ways for the public to contact law enforcement with concerns.

Table 3.3.2.1. Incident Identification Source, January 1, 2024 – September 30, 2024

Identification Source	Number	Percent
Incidents with Identification Source Provided	170	--
Identification/Investigation by IMMEGP Team	106	62%
Tip	48	28%
Identification/investigation not related to IMMEGP program	8	5%
Other	8	5%

The number of staff deployed to each incident varies widely depending on the assessed threat level and the resources a specific grantee has access to. Table 3.3.2.2. presents the average number of agency staff deployed per incident. Overall, a team of seven staff is needed on-site during an incident. Approximately half are supported with grant funds.

² Zip code may include land area in more than one county. The county affected listed here refers to the primary county that reported the incident.

Table 3.3.2.2. Agency Staff Deployed per Incident

Incident	Number
Incidents	241
Average Number of Staff Deployed per Incident	7.2
Average Number of Deployed Staff Supported by IMMEGP Grant	3.6

IMMEGP grantees frequently rely on partner agencies to aid in responding to an incident. Table 3.3.2.3. summarizes information on incidents involving a multi-agency response. In 55 percent of 170 incidents data is available for, grantees utilized multi-agency response teams. Other local law enforcement agencies were the most common type of agencies to participate when a multi-agency response team was required.

Table 3.3.2.3. Incidents with Multi-Agency Response, January 1, 2024 – September 30, 2024

Multi-Agency Response	Number	Percent
Incidents with Information Available	170	--
Incident Included Multi-Agency Response	94	55%
Type of Agency Involved in Response		
Federal	31	33%
State	36	38%
Local	71	76%

3.3.3 Individuals Reported on Scene

Table 3.3.3.1. presents the number of individuals law enforcement encountered on-scene during an incident. Criminal action was taken against 204 of the 351 individuals encountered (58 percent), with the majority of encounters resulting in arrest (25 percent).

Table 3.3.3.1. Individuals Reported On-scene, January 1, 2024 – September 30, 2024³

Incident	Number	Percent
Individuals Reported on Scene	351	100%
Arrested	87	25%
Referred to DA	83	24%
Cited/Ticket to appear	27	8%
Other Criminal Action Taken	7	2%

3.3.4 Incidents Reported at Repeat Locations and/or Related to Larger Criminal Organizations

Grantees also report on (1) how many grant-funded law enforcement actions were taken at a location that had been previously visited by law enforcement for illegal cannabis activities, and

³ Total may include number of individuals suspected/observed as being victims of human trafficking

(2) whether law enforcement investigators knew if the activities encountered during a given incident were related to larger criminal organizations. In 2023, law enforcement grantees reported that 36 incidents (16 percent) took place at a location they had previously investigated. In 2024, the number remained relatively consistent, with 30 incidents (12 percent) occurring at a location where an incident had previously been investigated.

Approximately 25 percent of incidents were believed to be related to larger criminal organizations during initial investigation. Upon further investigation, the percentage of incidents law enforcement connected to larger criminal organizations declined to 15 percent.

Table 3.3.4.1. Incidents Reported at Repeat Locations and/or Related to Larger Criminal Organizations

Incident	Number	Percent
Number of Incidents	241	100%
Repeat Incident at Location	30	12%
Average number of Repeat Incidents at Location	1.7	--
Incident Identified as Related to Larger Organization at Initial Investigation	61	25%
Incident Identified as Related to Larger Organization Upon Further Investigation	26	15%

3.3.5 Seizures Made During Law Enforcement Operations

As shown in Table 3.3.5.1, law enforcement grantees reported that 433,285 illegal marijuana plants and 35,219 pounds of processed illegal cannabis were seized during the reporting period. In addition to illegal cannabis plants and processed materials, grant-funded law enforcement operations also encountered other unlawful substances such as fentanyl and methamphetamine, firearms, and vehicles and equipment used in furtherance of unlawful grow operations, such as generators, water pumps, and construction equipment.

Overall, reported seizures were significantly lower in 2024 than 2023. This data aligns with grantee reports in 2024 that illegal grows were more geographically disbursed, better hidden, and had smaller harvests than in previous years.

Table 3.3.5.1. Seizures Reported During Law Enforcement Operations

Item Seized	Amount
Unlicensed Cannabis and Derivatives	
Plants	433,285
Processed (pounds)	35,219.4
Edibles (pounds)	272.2
Butane Hash Oil (pounds)	624.7
Other Illegal Drugs	
Cocaine (pounds)	9.1
Fentanyl (pills + pounds)	2,205 pills + 2.4 pounds
Psilocybin (pounds)	298.5
Methamphetamine (pounds)	11.9
Heroin (grams)	26.5

Item Seized	Amount
Other Items Seized	
Firearms	296
Money	\$1,173,244
Vehicles	39
Properties	8
Generators	6
Water Pumps	5

3.3.6 Felony Cases Reported

The CJC also tracks felony cases filed because of grant-funded operations. For each enforcement incident, grantees provide court case information for any felony cases forwarded to the county district attorney’s office. In 2023, 34 percent of incidents were forwarded to county district attorneys, while in 2024, 42 percent of cases were forwarded. Grantees noted that investigations were ongoing for many incidents, so cases were not always forwarded within the quarterly reporting timeline. It should also be noted that felony case counts reflect how the case was reported by grantees; the district attorney’s office may choose to file the case as a felony or a misdemeanor after the case is forwarded by law enforcement.

Table 3.3.6.1. presents the number of cases filed as a result of grant-funded law enforcement operations. In 2024, the 241 incidents prompted the filing of 48 felony cases, which resulted in eight felony convictions to-date. Thirty-three cases from 2024 are still open and pending resolution.

Table 3.3.6.1. Grant-Related Felony Cases Reported

Felony Cases Filed	October 1, 2022 – September 30, 2023	October 1, 2023 – September 30, 2024
Cases Dismissed	12	6
Cases Open	17	32
Felony Convictions	23	8
Misdemeanor Convictions	11	2
Total Felony Cases	63	48

3.3.7 Incident Case Examples

Incident data, such as incident date, zip code, number of staff deployed, equipment used, and property seizures typically reflect a specific point in time during an investigation when the grantee serves a search warrant to an illegal grow site. However, the investigative process involves many related activities that may extend months or even years before and after the incident date that is reported to CJC. Additionally, investigations may uncover illegal activities or environmental impacts associated with the incident that are not captured in the case charges but are safety and health concerns for the community. Grantees shared case examples that highlight the complexity of incidents they have encountered.

- While on-site serving a multi-agency search warrant, a grantee discovered 11 victims of labor tracking. The victims had been brought to the location from another country.

The victims received services from a local community-based organization. The property was connected to a drug trafficking organization (DTO) who laundered profits from the illegal grow through an out of state roofing company. The grantee seized 6,281 marijuana plants and 1,000 pounds of processed marijuana. Due to the environmental, water and electric violations found on-site, the grantee contacted the Oregon Water Resources Department (OWRD) and local code enforcement.

- A grantee investigated a DTO who purchased property in Oregon with the intent to grow illegal marijuana. The DTO hired workers to maintain the grows. Through the course of the investigation, the grantee discovered that the DTO was laundering money through casinos and through a life insurance policy. The grantee served a search warrant on the property and seized 3,614 marijuana plants. The grantee contacted OWRD and local code enforcement about environmental, water, and electric violations found at the grow. The grantee also discovered two individuals on-site who fled into the woods. Despite search efforts, the individuals were not located.
- Investigators received a request for assistance from an outside agency. The agency was tracking an individual who was suspected of mailing illegal marijuana and asked for the grantee's aid in continuing their surveillance. The grantee observed the individual traveling to a local FedEx location where the individual shipped four packages. The grantee interdicted the packages and found the individual had mailed a total of 30 pounds of processed marijuana to three different states. The individual was arrested.
- A grantee served a search warrant on an illegal marijuana grow where they seized 3,039 marijuana plants, 50 pounds of processed marijuana and one firearm. Additionally, the grantee discovered several water, electric and building violations on-site. The violations were referred to the OWRD, local code enforcement, and the building department. Two victims of labor trafficking were found on-site who stated they were brought to the location by a "friend" who was holding their passports. The victims reported that they had not been paid.

3.3.8 Occurrences of Human Trafficking Observed or Suspected

As shown in Table 3.3.8.1 below, the number of incidents where law enforcement observed or suspected human trafficking or other worker abuse in 2024 remained low, consistent with data reported in 2023. A total of 31 potentially trafficked individuals (survivors) were encountered at illegal grow sites in 2023, and 25 were encountered in 2024.

In 2023, grantees posited that the decrease in observed or suspected instances of human trafficking might be related to an increase in indoor illegal grow sites. Indoor grows tend to have more discrete controlled environments, and, therefore, have fewer grow tenders and/or workers on-site. However, OLCC data showed a decline in the number of indoor legal grows in 2024, and grantees did not report any noticeable shift towards illegal indoor grow sites compared to last year. Table B.2. in Appendix B provides a summary of the legal marijuana harvest by county and producer type for the reporting period.

Several grantees did report that illegal grows were more likely to be hidden off main roads, and up longer driveways compared to previous years. Consequently, individuals at the illegal grow sites become aware law enforcement is approaching earlier and may be able to disburse and hide before authorities arrive. However, this trend was not consistent across all grantees and may not account for the overall low number incidents with observed or suspected trafficking.

Table 3.3.8.1. Incidents with Observed or Suspected Human Trafficking

Incident	Number	Percent
Incidents	241	100%
Incidents in which Trafficking Observed or Suspected	5	2%
Total Survivors Observed	25	--
Individuals Provided with Resources	19	76%
Individuals Referred to Victim Services	11	44%

3.3.9 Services Provided by Community-Based Organization Programs

The grant program funds three CBO grantees that provide services to trafficked and abused workers coerced into labor at illegal marijuana grow sites. The first CBO, JBarJ, operates an anti-trafficking program designed to provide crisis support, trained interpreters, temporary shelter, and humanitarian aid to survivors encountered at grow sites. Program staff accompany law enforcement during investigations to initiate services on-site. Survivors can also be referred to the program by law enforcement or local community organizations or be engaged through outreach.

The second CBO, Willamette Valley Law Project (WVLP), provides legal representation, humanitarian aid such as housing, food, and clothing, culturally specific mental health services, community education, and other emergency supports to survivors of human trafficking. Survivors are referred to the program by law enforcement and partner agencies in the community or are engaged through outreach.

The third CBO, Safety Compass, became operational mid-2024 and has not had time to submit data on services or clients at the time of this report. Safety Compass plans to accompany law enforcement during incidents and provide crisis services and advocacy to survivors encountered on scene.

Tables 3.3.9.1. through 3.3.9.3. display data submitted by WVLP and JBarJ on the 563 survivors that sought assistance during the reporting period. Seventy-six percent chose to receive services after initial contact with the CBO. In addition to providing direct services to survivors, CBOs conducted 42 community education sessions with partner agencies and 88 outreach events. Both grantees highlighted how critical it is to provide community education on how to identify and work with survivors of human trafficking, as the issue is still largely unrecognized, especially in smaller communities.

As shown in Table 3.3.9.1., most survivors were engaged in services through outreach (96 percent). Notably, the 11 survivors CBOs reported as being referred by law enforcement are consistent with law enforcement grantees reporting they referred 11 survivors to CBOs for aid,

indicating the referral pathway between law enforcement and CBO grantees is effective when survivors are encountered at incidents.

Table 3.3.9.1. Community-Based Organization Sources of Human Trafficking Survivor Engagement

Engagement Source	Number	Percent
Total Survivors Engaged	563	--
Engaged through Outreach	539	96%
Referred by Law Enforcement	11	2%
Referred by Community Partners	13	2%
Total Survivors Served	428	76%

As shown in Table 3.3.9.2, most survivors seeking assistance needed legal services. Wage claims (87 percent) and employer criminal conduct/violence (30 percent) were the most frequently reported issues resulting in requests for assistance. Survivors also needed financial assistance (23 percent) and housing (13 percent) more frequently than other types of humanitarian aid. CBOs noted that many survivors seek services months after their work at an illegal grow site has ended, often when survivors are experiencing financial hardship and housing instability after not receiving the pay promised for their labor.

Table 3.3.9.2. Types of Services Needed

Types of Service*	Number	Percent
Legal	--	--
Wage Claims	487	87%
Employer Criminal Conduct/Violence	169	30%
Employment Related Housing/Living Issues	118	21%
Job Discrimination/Retaliation	89	16%
Immigration	68	12%
Job Injury/Health and Safety	54	10%
Criminal	2	0%
Humanitarian Aid	--	--
Financial	130	23%
Housing	72	13%
Food	37	7%
Travel	33	6%
Clothes	22	4%
Medical	8	1%
Mental Health	33	2%

* Table depicts the number/percent of clients engaged that identified needing a service at first contact with program. One client may need multiple types of service.

Table 3.3.9.3 provides a breakdown of the demographics of survivors served by CBOs during the reporting period. Survivors are primarily Hispanic, male, and ages 18-35. The percentage of survivors who chose not to share demographic information remained high in 2024, ranging from 80 percent who chose not to share their gender identity, to 90 percent who chose not to share their age.

Table 3.3.9.3. Demographics of Human Trafficking Survivors

	Number	Percent
Gender Identity		
Male	57	13%
Female	32	7%
Other	0	0%
Unknown	339	80%
Race or Ethnicity		
Hispanic	54	13%
Native American/Indigenous	19	4%
Other	9	2%
White (Non-Hispanic)	1	0%
Black (Non-Hispanic)	0	0%
Unknown	345	81%
Age		
Under 18	0	0%
18-35	35	8%
36-59	8	2%
60 and Older	0	0%
Unknown	385	90%

3.3.10 Grantee Collaboration with Other Agencies

The impacts of the illegal marijuana market in Oregon extend beyond the agencies and counties funded by this grant. Grantees frequently work in collaboration with other agencies such as Oregon State Police (OSP), Oregon Liquor and Cannabis Commission (OLCC), and Oregon Water Resource Department (OWRD) to conduct investigations and identify activities that are illegal or harmful to the environment and people of Oregon. Additionally, partner agencies conduct their own enforcement and monitoring activities related to illegal marijuana cultivation. The following section presents data from partner agencies and grantee incident data that highlights how these activities intersect with grantee efforts.

3.3.10.1. Oregon State Police Enforcement Activities

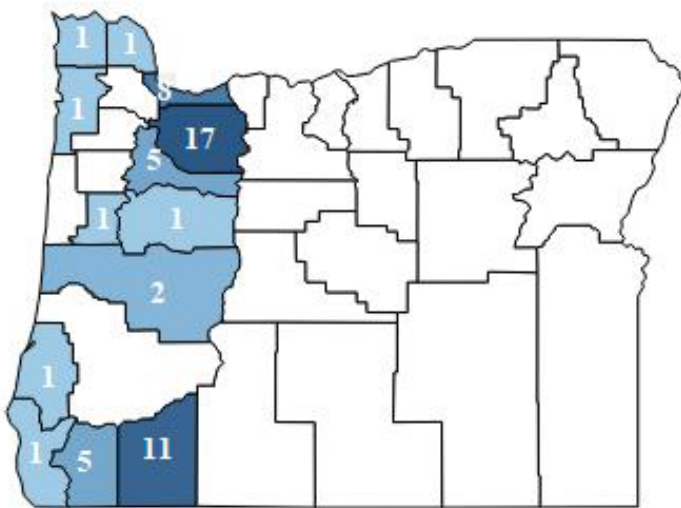
The Oregon State Police maintains an enforcement team that responds to tips, investigates cases referred by Domestic Highway Enforcement or Highway Interdiction Team detectives, assists local law enforcement, and conducts training and other activities aimed at eradicating illegal marijuana trafficking in Oregon. The team also commonly assists other agencies with data sharing, search warrant preparation and execution, evidence collection, enforcement, and surveillance.

In October of 2023, OSP realigned their Drug Enforcement detectives to better address Fentanyl issues. The realignment returned the footprint of OSP marijuana enforcement to the same level OSP maintained before the illegal marijuana boom in 2021 and 2022. The Oregon State Police currently has two OSP marijuana enforcement detectives assigned to the Jackson County marijuana team funded by this grant program. Additionally, one Northwest Region sergeant and

3.3.10.2. Oregon Liquor and Cannabis Commission Call Center

OLCC operates a call center that answers inquiries from the public and law enforcement about legal cannabis licensing and program compliance. The public also reports potential criminal activity and illegal grow sites through the call center. Grantees report they frequently contact the call center at the beginning of an investigation to determine if a site they are surveilling is legally licensed to grow cannabis. Table E.2. in Appendix E provides a count of inquiries made by law enforcement by month. From October 1, 2023, to September 30, 2024, the call center answered 2,974 inquiries from law enforcement. The call center also responds to inquiries from citizens and forwards any inquiries that concern potential criminal activity to law enforcement. Tips received by the call center vary widely, including but not limited to complaints about growing marijuana without a license (70 percent), reports of labor or sex trafficking (14 percent), and concern about the presence of firearms (two percent) or children (two percent). Table E.2. in Appendix E provides a breakdown of all inquiries by type of inquiry made.

Figure 3.3.10.2.1. Map of OLCC Call Center Inquiries Referred to Law Enforcement



Data collected about the inquiry also includes the address or location of the property where the possible illegal conduct is occurring. Figure 3.3.10.2.1 shows a summary of the call center inquiries referred to law enforcement by county. Most referrals were about properties in Clackamas County (31 percent), Jackson County (20 percent), and Multnomah County (15 percent).

3.3.10.3. Civil Enforcement Impacts

To better calculate the impact that illegal cannabis operations have on

communities and their resources, the CJC has also begun collecting information about civil enforcement actions associated with illegal grows sites. Of the 241 incidents reported by law enforcement grantees during the reporting period, approximately 82 (34 percent) involved a land, natural resource, or civil code violation such as water theft, illegal use of well systems, unpermitted cannabis cultivation, illegal camping, and/or illegal solid waste disposal. In these instances, local and state civil enforcement resources were contacted about the violation. Of those 82 incidents, code enforcement was contacted 71 percent of the time, OWRD was contacted 61 percent of the time, and the building department was contacted 17 percent of the time.

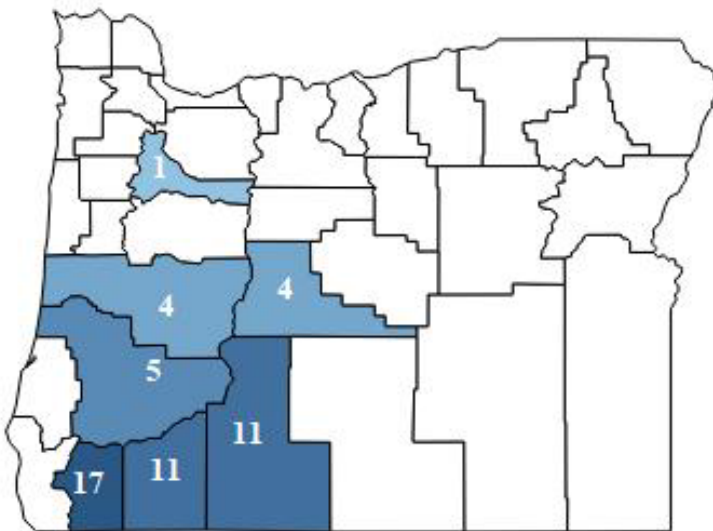
Overall, grantees reported fewer incidents involving land, natural resource, and civil code violations compared to 2023. This may be in part due to grantees investigating more cases where

illegal marijuana is being distributed through the mail, or “parcel cases,” in 2024. At least 41 of the 241 incidents (17 percent) were identified as parcel cases during the reporting period. However, this information is not consistently tracked, so accurate year-to-year comparisons cannot be made at this time.

Table 3.3.10.3.1. Incidents with Land, Natural Resource, and Civil Code Violations⁴

Incident	Number	Percent
Incidents	241	--
Incident Involved Land, Natural Resource, or Civil Code Violation	82	34%
Agencies Contacted to Address Violations		
Code Enforcement	58	71%
Oregon Water Resource Department/Local Watermasters	50	61%
Building Department	14	17%
Electrical Inspector	2	2%
Other Agency	1	1%

Figure 3.3.10.3.1. Map of Oregon Water Resource Department Law Enforcement Assists



Additionally, the CJC has teamed up with the OWRD to better assess where water resource violations associated with illegal cannabis operations occur and the types of violations that are occurring. OWRD also supports Law Enforcement partners by providing water use information for their utilization of the authority granted under 2023 SB 326. As shown in Figure 3.3.10.3.1., OWRD staff assisted law enforcement in 53 illegal cannabis raids in 2024. Of those,

17 occurred in Jackson County (32 percent), 11 occurred in Josephine County (21 percent), and 11 occurred in Klamath County (21 percent). Almost all raids occurred in grantee counties (98 percent). OWRD issued 45 notices of water use violation at sites where illegal use of water was confirmed (85 percent). See Appendix F for a summary of OWRD raids conducted in each county.

⁴ Percentages sum to greater than 100 percent. One incident may include in more than one type of violation and therefore require multiple agency contacts.

4 Future Program Funding Projections

The Illegal Marijuana Market Enforcement Grant Program is supported by a regular appropriation of \$6 million available every biennium. In 2023, the regular appropriation was supplemented by an additional \$5 million in one-time funding via House Bill 5506 (2023), for a total of \$11 million in program funds appropriated for the 2023-2025 biennium.

At the time of this report, approximately \$1.7 million of the 2023 -2025 appropriated funds remain unallocated and will be awarded through a competitive solicitation along with 2025 – 2027 biennium funds. Unless additional funds are appropriated to support the program in future legislative sessions, both law enforcement and CBO grantees will compete for the \$7.7 million, which represents a substantial decrease in funding compared to recent biennia.

Per House Bill 4074 (2022 Regular Session), the CJC is required to submit funding recommendations for this grant program to the legislature’s judiciary committees each year. The CJC must consider the best available information and projections regarding unlawful marijuana cultivation and distribution operations in Oregon as well as any human trafficking related to those operations. Funding projections were developed to examine the resource needs of existing grantees, and what it may cost to expand the program to new jurisdictions in future biennia.

4.1 Projections for Funding Existing Programs

The CJC assessed the resource needs of existing grantees in two ways. First, the agency looked at funding requests submitted in 2024 by grantees and adjusted amounts to reflect a standard biennial funding period. Fully funding existing grantees at requested service levels would require \$26.5 million, which represents \$20.5 million more than the biannual appropriation of \$6 million.

Table 4.1.1. Two-Year Funding Projection Based on Grantee-Requested Service Levels

Two Years at Requested Levels of Service		
Law Enforcement Grantees	\$ 19,924,411	<ul style="list-style-type: none"> • Projection for existing grantees to maintain operations at requested funding levels for two years • Does not include funds for new grantees or enhancements for existing grantees
CBO Grantees	\$ 6,562,947	
Total	\$ 26,487,358	

Second, the CJC used current expenditure levels to project how much it would cost for grantees to maintain existing services for a full biennium. Projections were estimated based on grantees’ average quarterly expenditures. For grantees that experienced large fluctuations in personnel costs, the highest average personnel cost was used in the estimate to reflect a fully staffed IMMEGP team. Additionally, the grantee-requested estimate was used for Yamhill County and Safety Compass as they have not yet reported expenditures. Funding existing grantees at current expenditure levels would require \$12.5 million more than the regular appropriation of \$6 million.

Table 4.1.2. Two-Year Funding Projection Based on Current Expenditure Levels

Two Years at Current Expenditure Levels		
Law Enforcement Grantees	\$ 15,698,552	<ul style="list-style-type: none"> • Projection for existing grantees to maintain operations at current average quarterly expenditure levels for two years, adjusted for fluctuations in staffing • Does not include funds for new grantees or enhancements for existing grantees
CBO Grantees	\$ 2,775,244	
Total	\$18,473,796	

4.2 Projections for Funding Existing Grantees and Expanding the Grant Program to New Jurisdictions

The CJC also estimated what resources may be required to fund new grantees if the program is extended to new jurisdictions. The funding projection based on current expenditure levels presented in Table 4.1.2. was used as the basis for these estimates. The funding calculation for two new law enforcement grantees includes the average two-year expenditures for existing grantees awarded \$5 million or less. The two grantees awarded over \$5 million, Jackson County and Josephine County, were excluded from the projection as there are likely no new jurisdictions with comparably high resource needs. An additional \$16 million more than the regular appropriation of \$6 million would need to be appropriated to fund existing grantees at current expenditure levels and expand the program to new grantees.

Table 4.2.1. Funding Projection to Include Program Expansion

Average Current Expenditures and Expansion Funds	
Average expenditure levels for existing law enforcement grantees	\$ 15,698,552
Funding for 2 new law enforcement grantees	\$ 1,603,163
Average expenditure levels for 2 existing CBO grantees	\$ 2,775,244
Funding for 2 new CBO grantees	\$ 1,850,163
Total	\$ 21,927,122

4.3 Grantee Reporting on Unmet Resource Needs

As part of their annual reporting, Grantees provide feedback on additional resources needed to address local illegal cannabis grows. The most common additional resources identified was more staff, specifically financial analysts or forensic accountants. Several grantees noted in interviews that offering these resources statewide would be beneficial, especially since so many agencies are experiencing ongoing staffing shortages.

Grantees also mentioned skid steers, rooks, heavy duty trucks, portable incinerators, a woodchipper, and other specialized equipment as resources that some grantees currently don't have access to.

CBO grantees shared that more resources are needed to bolster culturally and linguistically specific services that IMMEGP grantees refer survivors to, especially in smaller communities in

Oregon. For example, JBarJ noted that they have been able to hire staff that speak Spanish, however, other agencies do not have the same capacity making it difficult to connect Spanish-speaking survivors to other needed services that JBarJ does not provide in-house.

All grantees commented on the importance of IMMGP and expressed that their programs would not exist without continued support from this program.

Appendix A: Expenditures by Grantee

Table A.1. Combined 2021 - 2025 Grant Cycle Expenditures as of September 30, 2024

Organization	All Grant Funds Awarded 2021-2025	Funds Expended	Percent Expended
Columbia County	\$1,111,653.37	\$778,399.11	70%
Coos County	\$806,120.30	\$327,333.87	41%
Deschutes County	\$2,967,402.00	\$1,313,588.40	44%
Douglas County	\$2,260,870.04	\$829,944.88	37%
Jackson County	\$12,422,530.81	\$7,944,460.17	64%
Josephine County	\$6,390,576.72	\$3,763,531.92	59%
Klamath County	\$2,678,704.60	\$1,323,628.11	49%
Lane County	\$2,903,483.08	\$1,540,495.13	53%
Polk County	\$1,919,247.55	\$1,260,921.57	66%
Washington County	\$358,258.52	\$214,516.90	60%
Yamhill County	\$965,460.00	\$242,541.03	25%
J Bar J Youth Services	\$390,000.00	\$208,270.04	53%
Safety Compass	\$169,858.00	\$-	0%
Willamette Valley Law Project	\$5,737,926.00	\$2,490,031.67	43%
Total	\$ 41,082,091.00	\$22,237,663.00	54%

Appendix B: Illegal Cannabis Incidents by Zip Code

Table B.1. displays all zip codes in which law enforcement grantees reported illegal cannabis incidents occurring between April 1, 2022, and September 30, 2024, and their corresponding county locations, ranked from the zip code with the highest number of incidents to lowest number of incidents in each county.

Table B.1. All Zip Codes in which Law Enforcement Grantees Reported Illegal Cannabis Incidents*

County Affected**	Number of Zip Codes Affected	Zip Codes Included	Incident Count per Zip Code
Columbia	1	97016	11
	3	97048, 97054, 97056	3
	6	97015, 97022, 97051, 97080, 97086, 97214	1
Coos	2	97420, 97466	8
	1	97411	6
	1	97423	4
	2	97450, 97458	8
Deschutes	1	97739	9
	3	97701, 97703, 97707	4
	2	97741, 97756	3
	4	97702, 97703, 97754, 97759	1
Douglas	1	97470	29
	1	97471	20
	1	97410	14
	1	97442	11
	1	97457	5
	1	97496	5
	1	97499	2
	4	97462, 97429, 97469, 97432	2
	13	94479, 94710, 97757, 97424, 97463, 97481, 97484, 97476, 97435, 97417, 97436, 97416, 97422	1

County Affected**	Number of Zip Codes Affected	Zip Codes Included	Incident Count per Zip Code
Jackson	1	97504	38
	1	97537	34
	1	97501	29
	1	97524	22
	1	97502	18
	1	97503	10
	1	97525	9
	1	97530	7
	1	97520	7
	1	97535	5
	1	97540	4
	4	97541, 97503, 97525, 97526	3
	1	97530	2
4	97523, 97522, 97536, 97539	1	
Josephine	1	97523	42
	1	97538	16
	1	97527	15
	1	97526	21
	1	97497	9
	3	97532, 97544, 97534	4
	4	97501, 97530, 97537, 97543	2
	3	97502, 97527, 97531	1
Klamath	1	97624	11
	1	97621	9
	1	97623	6
	1	97639	4
	1	97603	3
	1	97627	2
	3	97622, 97633, 97641	1
Lane	1	97402	6
	1	97405	7
	--	Multiple Zip codes	5
	1	97404	3
	3	97430, 97434, 97448	2
	11	97424, 97426, 97431, 97438, 97439, 97451, 97438, 97448, 97478, 97487, 97493	1

County Affected**	Number of Zip Codes Affected	Zip Codes Included	Incident Count per Zip Code
Polk	2	97378, 97132	4
	2	97114, 97338	3
	2	97113, 97351	1
Washington	1	97005	9
	1	97231	7
	1	97003	5
	1	97223	3
	1	97062	2
	6	97035, 97133, 97024, 97038, 97071, 97224	1
Yamhill	1	97132	1

*Only includes incidents where a zip code was provided.

**Zip code may include land area in more than one county. The county affected listed here refers to the primary county that reported the incident.

Appendix C: Oregon Liquor and Cannabis Commission Harvest Data

Table C.1. and Table C.2. include data for 26 counties that reported legal marijuana harvests from October 1, 2023, to September 30, 2024. Counties that did not report harvest data include Crook, Gilliam, Jefferson, Klamath, Marrow, Sherman, Union, Umatilla, Wallowa, and Wheeler.

Table C.1. Legal Marijuana Harvest by County

County	Total Wet Weight (Pounds)	% of Statewide Harvest
Baker	195	0.0%
Benton	77,777	0.7%
Clackamas	913,564	8.1%
Clatsop	9,652	0.1%
Columbia	31,876	0.3%
Coos	47,979	0.4%
Curry	17,287	0.2%
Deschutes	210,435	1.9%
Douglas	15,483	0.1%
Grant	5,546	0.0%
Harney	614	0.0%
Hood River	139,167	1.2%
Jackson	4,172,463	37.2%
Josephine	3,323,674	29.6%
Lake	803	0.0%
Lane	659,861	5.9%
Lincoln	16,942	0.2%
Linn	52,018	0.5%
Malheur	15,010	0.1%
Marion	122,519	1.1%
Multnomah	575,285	5.1%
Polk	121,939	1.1%
Tillamook	12,928	0.1%
Wasco	42,911	0.4%
Washington	456,527	4.1%
Yamhill	169,842	1.5%
Total	11,212,300	100.0%
IMMEGP Counties	9,210,080	82.1%

Table C.2. Legal Marijuana Harvest by County and Producer Type

County	October 1, 2023 – September 30, 2024		
	% Indoor	% Outdoor	% Mixed
Baker	100%	0%	0%
Benton	21%	70%	9%
Clackamas	77%	7%	15%
Clatsop	100%	0%	0%
Columbia	71%	7%	22%
Coos	21%	78%	2%
Curry	65%	25%	9%
Deschutes	86%	2%	12%
Douglas	100%	0%	0%
Grant	5%	95%	0%
Harney	0%	0%	100%
Hood River	52%	22%	25%
Jackson	6%	78%	15%
Josephine	3%	81%	16%
Lake	100%	0%	0%
Lane	55%	21%	25%
Lincoln	92%	0%	8%
Linn	82%	0%	18%
Malheur	0%	67%	33%
Marion	98%	2%	1%
Multnomah	95%	5%	0%
Polk	41%	22%	37%
Tillamook	69%	31%	0%
Wasco	3%	0%	97%
Washington	63%	23%	14%
Yamhill	43%	27%	30%
Total	26%	58%	16%
IMMEGP Counties	15%	69%	17%

Appendix D: Oregon State Police Marijuana Team Statistics

Table D.1. Oregon State Police Cases by County, January 1, 2023 – December 31, 2023

County	Number	Percent
Clackamas	5	3%
Columbia	1	1%
Coos	1	1%
Jackson	39	27%
Josephine	49	33%
Klamath	2	1%
Lake	1	1%
Lincoln	1	1%
Linn	9	6%
Marion	23	16%
Multnomah	9	6%
Polk	1	1%
Yamhill	1	1%
Unknown/Other	5	3%
Total	147	100%

Appendix E: Oregon Liquor and Cannabis Commission Call Center Data

Table E.1. Oregon Liquor and Cannabis Commission Call Center Inquiries Referred to Law Enforcement

County	Number	Percent
Benton	1	2%
Clackamas	17	31%
Clatsop	1	2%
Columbia	1	2%
Coos	1	2%
Curry	1	2%
Jackson	11	20%
Josephine	5	9%
Lane	2	4%
Linn	1	2%
Marion	5	9%
Multnomah	8	15%
Tillamook	1	2%
Total	55	100%

Table E.2. Oregon Liquor and Cannabis Commission Call Center Inquiries Referred to Law Enforcement by Type of Inquiry

Type of Inquiry*	Number	Percent
Cartel Activity	1	1%
Distribution	1	1%
Firearms Present	2	3%
Labor/Sex Trafficking	10	14%
Minors Present	2	3%
Other Drugs Present	1	1%
Poor Living Conditions	1	1%
Unlicensed Grow	50	70%
Unknown	3	4%
Total	71	100%

*Total number of inquiry types is higher than the number of inquiry calls received. One call may have multiple types of inquiry.

Table E.3. Oregon Liquor and Cannabis Commission Call Center Inquiries Made by Law Enforcement

Month	Number	Percent
October	126	4%
November	142	5%
December	224	8%
January	261	9%
February	197	7%
March	255	9%
April	203	7%
May	360	12%
June	365	12%
July	201	7%
August	305	10%
September	335	11%
Total	2,974	100%

Appendix F: Oregon Water Resource Department Law Enforcement Assists

Table F.1. Oregon Water Resource Department Law Enforcement Assists

County	Law Enforcement Assists	Sites where an enforcement action was taken by OWRD	Percent of Assists where OWRD Action was taken
Deschutes	4	3	75%
Douglas	5	5	100%
Jackson	11	11	100%
Josephine	17	12	71%
Klamath	11	10	91%
Lane	4	3	75%
Marion	1	1	100%
Total	53	45	85%

Definitions:

Water Use Violations: When during the law enforcement assisted site visit a violation of Oregon water law is found to be occurring.

Enforcement Action: a legal notice is sent to the responsible party to address the illegal use of water. This is most frequently the landowner.