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October 16, 2020

To Scott Adair, Economic Development Director
Humboldt County, Economic Development Team
520 E Street, Eureka, CA 95501

RE: *Comments on Humboldt County Cannabis Marketing Assessment*

Mr. Adair,

As an attorney living in Southern Humboldt who focuses my practice on business transactions for regulated farmers, cannabis agriculture, and cannabis appellations, I am honored to submit the following comments regarding the Cannabis Marketing Assessment.

At the outset, please note that the marketing assessment is a brilliant document that should serve as the foundation for our County's forward movement on geographical branding. However, my primary request is that the County employ a "farmer-first" policy at the outset, as they are the origin of the regional supply chain. A farmer-first policy includes a thoughtful strategy regarding our County's regional dynamics to ensure that all regions and all the actors in the supply chain are valued throughout this process. As a secondary issue, more information from the County or the Economic Development Team is needed regarding the next procedural steps. Finally, government ownership of appellations should not be on the table here, as farmers must own their own appellations, though it makes sense for the County to own the intellectual property that is the County of Origin program and any related certification marks.

With that said, this marketing assessment must serve as the baseline for which the County takes further input on the particulars, such as (1) regional dynamics, (2) process development, (3) government ownership of regional intellectual property, and so on.

Sincere thanks for your time.

/s/ Heather L. Burke
Heather L. Burke

Humboldt County Cannabis Survey re Cannabis Marketing Assessment

Question 1 - “Introduction”

I strongly agree with the approach taken in the Humboldt County Marketing Approach that compares and contrasts various regional based marketing strategies since, in many ways, Humboldt County is in a similar position to other rural producer regions with a valuable product on the precipice of a presumably emerging global market. Additionally, we offer the following comments to issues raised in the introduction section (pg. 7-8):

1. I appreciate the strategic, rather than legalistic, approach to a regional based marketing program. As an attorney, I often encounter legal quagmires created by cannabis-related Gis that could stymie progress if we addressed them in strict legalistic terms, so I firmly believe that creating strategies which are based on express (i.e. written) value statements is often the only option to move such a complex project forward. To be sure, the path ahead is complicated, but thoughtful strategies for the logistical issues are well within Humboldt County’s reach. These strategies can then serve as the springboard for the establishment of “a foundation for resilient institutions that can help support the long-term vitality of the Humboldt cannabis industry and Humboldt County as a whole” as additional legal quagmires are solved in the coming decades. (Pg. 8.)
2. As a recent transplant to Southern Humboldt County, I am not super familiar with every twist and turn of Humboldt’s long history with regulated cannabis, it was clear from the public calls regarding this marketing assessment that regional dynamics within the County are a big issue. The County’s marketing strategy must consider that the bulk of the cultivation licenses are located in Southern Humboldt, and the bulk of the manufacturing, distribution, and retail licenses are located in the Humboldt Bay. How is that going to be addressed?
3. Procedurally, I wish the County was clearer in what the next steps of this marketing assessment are. As I gathered from the two public calls held by the County’s Economic Development Team, this document is intended to be tendered to the Board in early November to be approved in some manner, but it is not clear exactly how or what the ramifications of such a decision would be. I have no problems with the marketing assessment itself and strongly support its recommendations (as discussed in greater detail below), but I respectfully do not understand what the next step is. For example, I have not been able to determine whether we--as a County--are locked in forever to the 30 recommendations or is there more time to flesh out the applicability of each recommendation?
 - a. If the next step is to approve the 30 recommendations as-is, meaning without a public process to amend or alter the recommendations where they could be amended or altered, then I request a continuance of a minimum of one month to develop a more cohesive and strategic response to each recommendation.
 - b. If the next step is to approve the basic premise of the marketing assessment (i.e County enactment of a marketing committee or panel) with the express understanding that the 30

recommendations may be altered or amended via a more targeted public process moving forward, then I'm in support, provided the next step is made express to the public.

- c. In either event, the community needs a better understanding from the Economic Development Team as to what the decision to be put to the Board would actually mean in the development of a countywide marketing effort. No matter how we proceed, the County has a strong duty to parse out or tease apart regional dynamics and ownership of our primary asset: our intellectual property.
- d. In sum though, the overall strategy proposed by HCGA in this marketing assessment is powerful and I suggest this thoughtful document be the baseline from which the recommendations are further considered before enacted as-is by the County.

Question 2 - "Why Humboldt County Cannabis"

I strongly agree with the concept that Humboldt County cannabis marketing effort must be approached as "a project of consensus-building and regional organization that exceeds any individual producers or business interest." A few additional comments:

1. Notably, this quote in the marketing assessment comes from a wine representative, which is an industry premised on rugged individualism and conventional supply chain tropes: i.e. (1) rich white guys own a disproportionate quantity of the market share, and (2) wine production at scale is not often environmentally sustainable or regenerative. Cannabis can and must do better to ensure the strategically disadvantaged have a seat at the table, and that our environment is protected, either through requiring environmentally sustainable or regenerative production models or through offering additional support to environmentally sustainable or regenerative producers through additional grants or some other incentive model.

The Humboldt County Economic Development Team has a responsibility to ensure that legacy producers, people of color, women, the elderly, and those with cannabis related criminal histories are heard, and that cannabis is not treated as another degenerative extraction-based industry that can be taxed to death. The goal, as is clear from the marketing strategy, is long term viability for the entire county.

Thankfully, these concepts are baked into the marketing assessment's Lessons and Findings and Recommendations, but the County must make them a fierce priority at the outset.

2. I strongly agree with the marketing assessments "internal conviction" that Humboldt cannabis producers "are unmatched in North America - and perhaps the world - in terms of a deep knowledge about the cannabis plant, a collective library of unique cannabis genetics, a range of specific microclimates well-suited to cannabis cultivation, and the use of production practices perfected over many decades." (Pg. 11.) I note that the most of these practices originate with the farmer but are also dependent upon the farmers' positive working relationships with the related supply chain operators. The County's policy must consider the farmers' voices as its highest priority, and then

secondarily ensure that other folks in the supply chain are supported in ensuring the production ecosystem is healthy and happy. Everyone in our county will benefit with a “farmer-first” marketing policy.

3. I strongly agree that the Humboldt County marketing program must engage in policy development to meet its regional goals. This fact is a given, in my mind. Working in conjunction with local and government to develop a meaningful program is one of the most existing facets of this program. Cannabis farmers and the cannabis industry as a whole, particularly in Humboldt County, have repeatedly shown exceptional policy savvy and there is no reason why a marketing program would be any different. We are literally changing the world here.

Question 3 - “The State of Humboldt County Cannabis”

1. I agree that Humboldt County cannabis is in a “unique position” in the marketplace. Truer words have perhaps never been spoken. This is a unique time in history and our County is at the forefront of the global shift. This is the time to be exceptional in our messaging. It is true that Humboldt County is a major volume producer, that it is a specialty producer in craft cannabis, and is comprised of geographically disparate production regions. I also agree that a marketing program should ensure legitimacy, a unified message, and long-term effectiveness. As noted above, the geographic distinctions require the County to develop a strategy that considers the various regional dynamics in some public manner.
2. I also agree that, considering the current marketing program is funded entirely by the farmers, that the County risks enacting a free-rider program. (Pg. 14.) However, it is also correct to state that cannabis consumers must be educated about the benefits of sungrown cannabis. As such, a successful marketing program must (1) immediately address regional and supply chain dynamics to negate the appearance of a free-rider program, and also (2) include consumer education strategies which promote sungrown cannabis. Balancing these two concerns in an express (i.e. written) strategy will strengthen a county-wide program.
3. I agree with the marketing assessment’s characterization of the most widely recognized regional intellectual property strategies, which are (1) county of origin, (2) appellations of origin. I am less concerned about how certification marks play into the use of geographic indications such as county of origin or appellations of origin, since certification marks used for the purpose of certifying the standards, practices, and cultivars utilized by a hopeful appellation are already to some degree baked into the use of the appellation name. As for County of Origin program, the County is authorized to enact standards by ordinance (and subjected to contractual principles) for enforcing County of Origin-related standards, at least until certification marks are available.

To compare, the Napa Valley Vintners Association (the trade association tasked with enforcing the Napa Valley name) sought a certification mark merely to certify that wines containing the Napa Valley name or mark are comprised of grapes produced with the Napa Valley region, something presumably already required under American Viticultural Area rules. However, imposing that

requirement via a certification mark gives the mark's owner greater enforcement rights, so certification marks should be a part of the strategy once available.

4. I agree Humboldt County must be prepared for national and international markets to open in the coming decade or so. Any marketing strategies that fail to account for the cross-border market potential may lose significant market share once those markets do open. The time is now.
5. I agree that cannabis' current THC-centric valuation is not a sustainable value metric and that the County should not be basing any marketing efforts off of this perhaps outdated metric.
6. I agree that the relationships between farmers and distributors is complicated, and their complex relationship arises from state law, but is exacerbated by County policy. The County should seek further input from farmers on pragmatic solutions which the County may implement to mitigate or negate supply chain quagmires. Broader farmer access to full-scale distribution licenses on rural parcels is likely a good start (i.e. true "self-distribution"). At the risk of redundancy, the County must approach farmer-distributor relations from a "farmer-first" perspective, as the product's source must be valued appropriately at the outset for a regionally interdependent supply chain support system to be effective.

Question 4 - "Geographical Indications and Regional Brand Identity"

1. I agree with the marketing assessment's premise that "geographic indications are not exclusively commercial or legal instruments" (pg. 22.) because geographical indications may be utilized to perform multiple functions in the broader context of rural economic development. For instance, geographic indications can indicate sustainable environmental practices and/or regenerative business practices in-and-of-themselves and, at the effects of climate change are ever increasing, we can afford to be creative in utilizing the many deliverables of geographic indications.
2. Success on a large scale will be measured in decades. That is the damn truth. To ensure that long game success remains tethered to pragmatic program deliverables, the County should set 5, 10, and 20-year deliverables for whatever regional marketing program it sets in motion. Clear benchmarks help everyone succeed.
3. The marketing assessment notes that the development of successful geographic indicators brings three common benefits: (1) supporting rural producers, (2) supporting rural economies, and (3) internalizing environmental and social considerations. In order to bring about each of these three benefits, the County must recognize that "rural producers" must refer in this context primarily to our County's licensed cannabis farmers, as the bulk of the other supply chain producers (primarily manufacturers and distributors) are located within more urban or industrialized areas of the County. I request the County keep its focus on the farmers and the regions in which the farmers are located. If the farmers are happy with the program, everything else will fall into place, but the onus is on the County to ensure a program with rural deliverables is designed to promote those rural areas as an express first priority.

Question 5 - Colombian Coffee

I like that Colombian coffee is a strong public-private partnership, which I think is particularly interesting in cannabis because of our nation's prohibitionist history and the current Schedule 1 designation. Cannabis farmers and the industry grew up outside the law and we have often had an outsider view to the fall of degenerative consumerist business models. Thus, a quasi-governmental agency approach, where the government provides centralized processing and distribution service while also perhaps owning the intellectual property (aka the GI or the appellation), may not be an acceptable model to most cannabis farmers, who must be the driver of these policy decisions. Rather, appellations must be collectively owned and managed by the private members of the appellation (aka the farmers), rather than by the government agency. However, governmental ownership of County of Origin and related IP does make sense.

The County may also want to consider requiring any committee or ad hoc working group answer these questions and enact a thoughtful policy from there.

A working group, particularly one that has a broad representation of cannabis farmers from throughout the County, could be tasked with answering (1) what level of government-private partnership is appropriate for Humboldt County GIs, i.e. determining the best organizational structure based on the industry's desired roles and responsibilities, (2) identifying a regional strategy to protect our geographic indications (i.e. who owns and who enforces the intellectual property that is the Humboldt County name and the local appellation name, including any related certification marks), (3) identifying a thoughtful strategy for identifying and implementing quality standards, and so on.

Question 6 - Case Study - Kona Coffee

Kona farmers, with a total number of just 630, are more on par with Humboldt County cannabis farmers, in number and in desire for a quality (rather than quantity) marketing goal. Kona coffee farmers can serve as a prescient lesson for Humboldt cannabis farmers in the intersection of quality standards with geographic indications and quality standards. Humboldt County farmers, primarily through Humboldt County Growers Association and the International Cannabis Farmers Association, were crystal clear in [their request to the state's Department of Food and Agriculture for the most stringent standards](#) available for appellations of origin. To me, that is a sign that Humboldt County cannabis farmers and the related supply chain industry is fully aware of the tradeoffs in the quality over quantity analysis in global supply chains, and they have made their call.

Notably, Kona coffee suffered heightened issues with fraudulent product, likely due to their lax 10% Kona coffee rule, which in turn led to a fall in consumers trusting the Kona product. In California, a strong stance against interlopers has been taken, as the state has already mandated that (1) all cannabis labeled as from that appellation be comprised entirely (100%) of cannabis produced within the appellation's boundaries (Cal. B & P. § 26063 (b)(3)), and (2) that all cannabis produced within an appellation be planted in the ground and flowered under the natural sun (i.e. no artificial lights or tarps) (B & P. § 26063 (c)).

To prevent what happened in with Kona coffee copycats, Humboldt County should heed the already-spoken word of our local cannabis farmers and continue to support them in whatever positions reduce fraud to the

greatest degree reasonably achievable. Protection from fraud oftentimes takes the shape of heightened standards or governmental controls which--while seemingly contrary to cannabis farmers' former identity as outliers to the legal system--are increasingly identified as necessary for protection from interlopers and for the development of a solid regional identity.

Question 7 - Case Study - Bordeaux wine, France

Many exciting facets of the Bordeaux's *appellation d'origine controlee* ("AOC") model are present in California's cannabis appellations, most notably (in my opinion anyway) the quality classifications which can for some equate to hitting marketing gold, such the "Grand Cru" classification. Perhaps more excitingly, given my profession as a transactional attorney, the *La Place de Bordeaux* is a quality-focused distribution network created within the AOC system that can guarantee advance sales for the product. Its a farmer's dream.

We have much to learn from the public-private partnership in the Bordeaux model, and I encourage the County to look to this model as exemplary. Notably, Bordeaux grape growers and vintners are predominantly white males, so Humboldt's innovation on Bordeaux's style of place-based economic development must include women, people of color, and others who have historically been disadvantaged. Bordeaux's approach has so much to teach us, but we can (and we must) do better.

Question 8 - Case Study - Napa Valley wine

I appreciate the Napa Valley example but it should be distinguished from Humboldt County cannabis in many ways. First, Napa Valley wines fall victim to familiar tropes, in that market share belongs almost entirely to white landed males. Humboldt County must ensure women, people of color, and the historically disadvantaged can meaningfully participate in our supply chain from the outset. Additionally, Napa Valley production models have not prioritized environmental sustainability, as stories abound of pristine meadows razed for mono-cropped grapes without permission, while a 10,000 sq ft sungrown cannabis farmer nearby pays quadruple in costs to the Department of Fish and Wildlife.

Additionally, Napa Valley farmers considered and rejected governmental controls over their growing practices in a nod to their rugged individualism under their largely westward expansionist outlook. Cannabis farmers are far more deferential to the good of their community as a whole because, for many years when farmers lived outside the legal system, community was everything. Humboldt County should reject marketing efforts based on rugged individualism, as that theory as a means of economic development is beginning to implode before our eyes. We understand that we live in community and, to be successful, this program must provide more than just trickle-down value to the region.

However, like Napa, the farmers should be the owners of their farm-specific and appellation-specific intellectual property. In the Napa Valley example, the farmers either licensed or transferred their IP rights to their trade association, the Napa Valley Vintners Association ("NVV") who aggressively enforces against interlopers. Their aggressive strategy should be mimicked by Humboldt County to a similar degree where reasonably appropriate based on our different values. A greater reliance on heightened governmental controls in cannabis may allow the state to take on a greater role in enforcement against interlopers, such

as in the case of Bordeaux, although our policy channels will take a far more complex path due to cannabis' Schedule 1 status and state-specific policies internationally.

Question 10 - Recommendation for a Humboldt County Cannabis Marketing Program, Part 1 of 3?
Recommendations 1-10:

1. Humboldt's cannabis marketing program should be built on a strong institutional foundation that prioritizes long-term strategic vision over short-term sales.

I strongly agree.

2. Collaboration between industry and government should be the foundation of Humboldt's cannabis marketing program.

I agree. The level of collaboration between public and private, however, needs further community input.

3. A marketing program will benefit from strong ties to the community organizations beyond industry and government.

I strongly agree. All stakeholders should have a seat at this farmer-first table.

4. The organizational and decision-making structure that determines marketing efforts should be representative of, and accountable to, the Humboldt cannabis industry.

I strongly agree. This must include women, people of color, and the historically disadvantaged, in addition to appellations, cooperatives, independent brands, and distributors. Equitable participation includes everyone.

5. The organization that receives Humboldt County marketing funds should be held accountable to public oversight. Specifically, we recommend establishing a single County committee tasked with review for all tax-funded countywide promotional efforts.

I strongly agree. Any organization or organizations who receives Humboldt County marketing funds should be held to strong public oversight. I agree the County should empanel a committee tasked with review of the county's tax-funded promotional efforts. Is the County going to empanel the committee before or after taking further input on this process though? That is not clear.

6. Humboldt manufacturers, distributors, and retailers should contribute proportionally to collective marketing efforts.

I strongly agree. This program cannot be paid for on the backs of our farmers alone. They are already overburdened. This is a collective, county-wide effort and everyone should pay their proportionate share. How that proportionality is determined should be one of the committee's first priorities.

7. Marketing efforts should build close relationships with appellations and cooperatives as they develop.

I strongly agree. Appellations and cooperatives will be leaders in these conversations so close relationships with these industry leaders, as well as with any other entity or quasi-governmental groups which may arise, such as cannabis-related agricultural commissions which may or may not be employed by the industry in the future.

8. Messaging should be developed with substantial community input and reflect community values.

I strongly agree. The County or its marketing committee must institute procedures for taking input to ensure messaging (and policies) reflect Humboldt County's values.

9. Consider adopting a countywide stamp program, including a certification mark, once this resource becomes available.

I strongly agree. One of the greatest lacks in the state's cannabis appellation regulations is the lack of a stamp or seal program, but the County is empowered to do so for its County of Origin program, and it should. Stamps and/or seals designating County of Origin or a particular appellation located within the Humboldt County boundaries should be a high priority for the County or its marketing committee at the outset.

Although certification marks are not currently available at the state level (and are not available to cannabis on the federal level due to cannabis's Schedule 1 status), this is a prime area for the County or its marketing committee (or any private party hired by the County to assist in these marketing efforts) to focus its policy shaping resources.

While the lack of certification marks does present logistical issues for cannabis appellations and cooperatives, the example of Napa Valley may be helpful. Napa Valley is a different type of appellation which was granted by the government in 1980. Napa Valley sought a certification mark for wine produced within the Napa Valley region in 2011, over two decades later. My understanding is that the certification mark was not granted until 2015. The implication is that, while certification marks are important, cannabis appellations and cooperatives will be able to build the regional brand using the appellation name or certifying standards to the consumer via a contractual (rather than licensing the certification mark) relationship between the farmers and their cooperative. It's a bit complex, but development of appellations or even regional standards should not be substantially stymied by the current lack of complimentary certification marks.

Thankfully, numerous appellation policy groups are working to include cannabis-certification marks in further statutory or regulatory cleanup packages and this County should have this policy change on its radar at the outset. In any event, we should see certification marks applied to cannabis far sooner than they were applied to wine.

10. IP for the Humboldt County cannabis marketing program should be held by the local government.

I disagree with respect to appellations-specific IP, but agree with respect to the County of Origin, any related certification marks, and the broader marketing campaign IP. Appellations have been presented to farmers as an IP asset that is collectively owned by the farmers in those regions themselves, and we should not stray from that wise course. On the other hand, of course the County should own its “County of Origin” IP and any certification marks related to the use of the County of Origin IP which the County may employ once such marks are available.

An open question regarding ownership of IP created in the public-private partnership remains though and government-ownership of such IP may not make sense in some instances while it may in others. For example, the marketing activities of Southern Humboldt Business and Visitors Bureau (SHBVB) likely resulted in the development or creation of certain regionally based intellectual property assets. It is not immediately clear from the County’s contract with SHBVB who owns those IP assets: is it SHBVB or the County? While I significantly appreciate and support SHBVB’s wonderful efforts, which were wildly successful in my view, it is likely appropriate for the County to own any IP generated by its contractors using County tax funds.

Notably, however, the comments on Economic Development Team’s two one-hour public calls regarding this marketing assessment noted some uncomfortability in countywide tax monies being used for a marketing campaign that applied primarily (but not solely) to Southern Humboldt. While I do not have any easy answers for how to handle regional dynamics, the County must facilitate some public process to ensure those regional dynamics are addressed at the outset. We cannot be fighting one another if we’re to be successful: the time is short and the task ahead of us is historic in size and scope.

In any event, I do believe that County ownership of the countywide marketing efforts makes sense, except that government ownership does not work for appellations.

Question 11 - Recommendations 11-20

11. A Humboldt cannabis marketing organization should have capacity to develop and enforce an IP strategy, including registration of marks, enforcement against fraudulent uses, and integration with IP-related public policy issues.

I strongly agree. Integrity in the use of the regional IP results in heightened consumer trust and thus the higher price on the craft or commodities market, depending on the IP asset in play. Without the authority to protect (i.e. register) and enforce the IP, the program will have no teeth. However, the County should not take on the enforcement activities of the appellations, at least not at this juncture.

12. Marketing efforts should prioritize building relationships with distributors and retailers in major urban markets.

I strongly agree, provided such relationships are prioritized under the County's "farmer-first" policy. Such relationships should never be prioritized over our local farmers and local supply chain operators.

13. Marketing efforts should prioritize building relationships with equity businesses.

I strongly agree. As I've said above, this must be a priority at the outset. Nothing less is acceptable.

14. Marketing efforts should work to influence market dynamics, not only to maximize sales within existing market dynamics.

I strongly agree. We cannot be passive victims to market dynamics in a market that Humboldt County dominates. We must work to influence those markets to our collective advantage at the outset.

15. Programmatic marketing efforts should carefully consider prioritization of resources.

I agree. The deployment of resources according to a defined (written) strategy is always a good idea.

16. Marketing efforts should promote Humboldt and its subregions through a lens of terroir.

I wholeheartedly agree! It is all about terroir, which is the essence of a region's biophysical and cultural factors, as expressed in an agricultural product.

17. Incorporate public relations and media coverage into countywide marketing efforts.

I strongly agree. I can't imagine a marketing effort that does not include public/media relations as a necessary component of the marketing effort. These go hand-in-hand.

18. Marketing efforts should promote emergent cannabis tourism and coordinate with existing tourism promotion programs on joint content marketing efforts.

I strongly agree. Tourism is a deliverable of this project and, as such, tourism should be included in the County's express (i.e. written) 5, 10, and 20 year program goals.

19. Track the development of cannabis grading standards over time, and consider promotional efforts related to the development and implementation of standards.

I strongly agree.

20. Consider conducting agricultural and consumer research on cannabis quality and grading standards.

I strongly agree.

Question 12 - Recommendations 21-30

21. Over a long-term horizon, consider the adoption of minimum quality standards or quality-based classification for cannabis labeled with the Humboldt name. Any potential minimum standards should be based around a thorough stakeholder driven process and a high degree of substantiated industry consensus.

I strongly agree. The lack of quality standards is one of the most pressing issues in our County's path to success and is lacking throughout the industry at wide. The County can and should consider adopting some minimum quality standards for County of Origin products and, at the same time, facilitate the stakeholder driven process for greater consensus from farmers and related supply chain operators, and related policy development.

22. Collaborate with appellations on the marketing of appellation quality control standards, and other appellation-related programs.

I strongly agree with the caveat that the County should support not subvert the will of the appellations where conflict exists. The appellations should be collectively owned by farmers themselves and thus, in its "farmer-first" policy development, the County must collaborate in a supportive manner.

23. As appropriate, consider using Measure S funds - such as microgrant funds -- to support cooperatively owned processing and distribution.

I agree. I'm new to Humboldt County, so I have a limited understanding of the history of Measure S. But we need microgrants to support cooperative (or collectively) owned processing and distribution, for damn sure.

24. A Humboldt cannabis marketing program should integrate public policy expertise on issues including: how policy dynamics will affect the California market, how policy dynamics will affect the availability and nature of interstate markets, development of IP protection strategy, and policy and compliance considerations related to legal restrictions on cannabis marketing.

I strongly agree.

25. Marketing efforts should consider the potential impact of programmatic marketing activities on a state, local, and international policy developments.

I strongly agree.

26. Consider conducting research on consumer trends, quality control, agricultural practices, etc and making this research available to all Humboldt cannabis businesses.

I strongly agree. Consumer research is critical to any successful marketing strategy.

27. A Humboldt cannabis marketing organization should make revelation education materials available to all Humboldt cannabis businesses.

I strongly agree.

28. Marketing efforts should promote existing baselines for environmental sustainability in Humboldt, including sungrown production methods, stringent environmental regulation through multiple state and local agencies, and the prohibition on the use of pesticides.

I strongly agree. In light of the growing and disastrous effects of climate change, sustainable and regenerative policies must be at the forefront of our marketing efforts.

29. Marketing efforts should collaborate with appellation regions to promote sungrown with higher voluntary environmental standards, including regenerative and permaculture methods.

I agree, though I would not limit this to appellations. For instance, the efficacy of this approach is already being shown with the permaculture requirement on the 2000 sq ft garden ordinance recently approved by the County.

30. Marketing efforts should consider promoting additional environmental certification only in such certification standards are sound, can be adequately promoted to consumers, and will be widely adopted by producers.

I strongly agree. Environmental sustainability (i.e. where no harm is done) and environmental regeneration (i.e. where past harms are reduced) is a key commitment made by our local cannabis farmers in their support for SB 67 (the terroir baseline for cannabis appellations). In a time of increasing climate change-related devastation, our County's marketing program must ensure sustainability (or regeneration) is beyond paramount: it is our legacy.

End of document.