



Burns & Levinson

Peter F. Durning  
[pdurning@burnslev.com](mailto:pdurning@burnslev.com)  
617.345.3269

January 25, 2024

**VIA ELECTRONIC MAIL**

Mark Montanari, Chair  
c/o Maren Toohill, Town Planner  
Littleton Planning Board  
37 Shattuck Street  
Littleton, MA 01460  
[MToohill@littletonma.org](mailto:MToohill@littletonma.org)

Re: Sanctuary Medicinals, Inc., 234 Taylor Street, Littleton, MA

Dear Chair Montanari:

This firm represents Sanctuary Medicinals, Inc. (“Sanctuary”) regarding the application of Sanctuary for the Adult Use Marijuana Establishment Special Permit Renewal/Site Plan Review/Water Protection District Special Permit” (the “Applications”) for Sanctuary’s facility at 234 Taylor Street, Littleton, Massachusetts (the “Facility”). This letter is to follow up on the Planning Board’s continued hearing on the Applications held on October 26, 2023 and in anticipation of the continuance of that hearing to February 1, 2024.

Through this letter we hope to address any remaining outstanding issues to assist the Planning Board to close the public hearing and move to vote to approve the Applications.

**Submittals to the Planning Board**

In addition to the materials Susan Carter transmitted to the Planning Board on January 22, 2024, along with this letter we are submitting the following information:

- a) 234 Taylor Street, Littleton, MA, SMA Littleton Expansion plans, prepared by Caveney Architectural Collaborative, dated January 19, 2024;
- b) 234 Taylor Street, Littleton, MA, SMA Littleton Expansion Schematic Plans SKM-1, 2, & 3, prepared by Caveney Architectural Collaborative, dated January 19, 2024:
  1. SKM-1: Proposed HVAC Layout;
  2. SKM-2: Proposed Make-Up Air Layout; and,

3. SKM-3: Proposed Exhaust Layout;
- c) Memorandum, Tech Environmental, Inc., dated January 19, 2024;
- d) Odor Management Plan, Tech Environmental, Inc., dated January 25, 2024; and
- e) Screenshots of the draft mock-up version of the odor complaint website:  
[www.taylorstreetlog.com](http://www.taylorstreetlog.com).

Sanctuary shared the draft website with the BOH and received some constructive comments. Sanctuary is evaluating those comments and may make some enhancements going forward.

### **Issues Raised by Anna Hueston's Question for the Applicant**

In an email dated August 8, 2023, and during the public meeting on October 26, 2023, Board Member Anna Hueston posed certain questions to the Applicant. We believe we have responded to the majority of these issues, but to be certain they have been addressed we are providing written responses here.

1. In response to the question regarding the duration of the shifts, we reviewed this inquiry with the Company. Based on our review of the changing operating dynamics at the facility, on behalf of the Company we are requesting that the Planning Board modify the hours of operation in the Special Permit to 6 AM to 10 PM. As before, the Special Permit should recognize that there may be additional work after these main hours of operation. This allowance for additional work should recognize that “workers may be present outside of these hours of operation for janitorial, maintenance, security and harvesting activity.”

Under these main hours of operation, the Company anticipates that the two general shifts will run from 6 AM to 2 PM and from 2 PM to 10 PM. While these blocks represent significant worker shifts, Sanctuary provides some flexibility to its staff to accommodate second jobs as well as childcare and other domestic obligations. Thus, some workers are not on the strict shift schedule.

2. Sanctuary is 100% owned by Premier Healthcare Group, LLC. The owners of Premier Healthcare Group, LLC are:
  - a. Jason Sidman - 3 Maronos Drive, Salem, NH 03079;
  - b. Joshua Weaver- 7 Wingate Court, Stratham, NH 03885; and
  - c. James Alex- 1 Surf Village, Unit C, Manchester, MA 01944

3. In response to an issue regarding the quantity of materials processed, we can confirm that the entry is accurate. While the facility grows and packages 16,000 lbs/year of marijuana flower, and of that total 8,000 lbs/year are processed or manufactured into products.
4. Nick Satmary addressed the question regarding the status of the Host Community Agreement at the hearing on October 26, 2023. He explained the HCA is still being negotiated and those negotiations are tentative while there are potential changes to the Cannabis Control Regulations.
5. No Community Outreach Hearing is required at this time. Section 173-200M of the Littleton Bylaws references the requirements in 935 CMR 500.101(1)(a)(9) and 935 CMR 500.101(2)(b)(8).

Neither of these regulations are applicable to a Special Permit Renewal process. 935 CMR 500.101(1)(a)(9) set out requirements for “New Applicants,” so that would not apply for this Special Permit Renewal, and 935 CMR 500.101(2)(b)(8) is a requirement for the License Pre-certification Application Process for Economic Empowerment Priority Applicants and Social Equity Program Participants.

6. Susan Carter addressed the issue regarding any stormwater analysis at the October 26, 2023 meeting. She confirmed that no stormwater permit is required.

## Conclusion

Sanctuary has made significant improvements to its odor control system, including replacing the worn seals on its HVAC unit doors, installing and operating three new internal carbon odor filtration systems and a new ozone odor control system. We were very pleased with the positive assessment of these improvements by the Board of Health during its January 24, 2024 public meeting.

As set forward in its Memorandum, Tech Environmental confirms that the Facility complies with the OMP and will have substantial odor mitigation and redundancy under the approval of the Applications. Since all of these improvements and other odor mitigation aspects such as best management practices, odor surveys, the 24-hour odor hotline, odor response protocols, and required operation and maintenance of the odor control system are built into the OMP, compliance with which Sanctuary has agreed can be a condition to its Special Permit, Sanctuary expects the Board will approve the Special Permit as proposed. Please let me know if you have any questions or concerns regarding the foregoing.

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Best regards,



Peter F. Durning

cc:     Sanctuary Medicinals, Inc.  
Littleton Board of Health ([health@littletonma.org](mailto:health@littletonma.org))  
Littleton Selectmen ([mnordhaus@littletonma.org](mailto:mnordhaus@littletonma.org))  
Matthew Pinard, Littleton Police Chief ([MPinard@LittletonPd.com](mailto:MPinard@LittletonPd.com))  
Susan Carter, P.E., Place Associates, Inc.  
Michael T. Lannan, P.E. Tech Environmental