

From: mike.head@byers-scientific.com
Sent: Monday, April 22, 2024 4:08 PM
To: sbcob
Cc: 'Marc Byers'
Subject: Board of Supervisors April 23, 2024 Meeting/Hearing | Public Comment | Byers Scientific
Attachments: Byers Scientific to SBC Board of Supervisors (04.22.24).pdf

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Dear Clerk of the Board of Supervisors:

Attached please find our company’s public comment letter to be presented in-person by our CEO/President Marc Byers (copied) at tomorrow’s meeting/hearing. This relates, specifically, to Item #4 of the Departmental Agenda – Planning Items and Public Hearings: Planning and Development Department – the hearing to “[c]onsider recommendations regarding a [b]riefing on cannabis odor abatement plan compliance monitoring in Santa Barbara County.

Please let us know if you have any issues opening the attachment or any other questions or concerns regarding the above or the attached.

Thank you very much.



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April 22, 2024

County of Santa Barbara, California
Board of Supervisors
105 E Anapamu St.
Santa Barbara, CA 93101

Re: April 22, 2024 Meeting

Dear Board of Supervisors:

As you may be aware, my company, Byers Scientific, provides odor control and indoor air purification technology for commercial cannabis facilities across North America, Europe and the Middle East as well as here in Santa Barbara and other California counties.

In Santa Barbara County the vast majority of cannabis customers have installed our company's patented Vapor-Phase odor control systems and Farmlane/CVW has installed both our Vapor-Phase system as well as our molecular filtration units (aka carbon scrubbers).

We have reviewed the April 17, 2024 Santa Barbara County staff report and its exhibits, including a list of cannabis operators and their odor control technologies. I would like to take an opportunity to address some inaccuracies, clarify potential confusion and pose relevant questions for the Board's consideration.

First, I want to commend our local customers who have taken their responsibility as corporate neighbors seriously. Companies like Glasshouse Farms, Headwaters, Autumn Brands, HQM, and Pacific Grown Organics have consistently operated and maintained their, true to its description, Vapor-Phase odor mitigation equipment and adhered to County regulations with respect to operational hours and system performance reporting.

In particular, I would point out Farmlane aka CVW Organics whose combination of Byers Vapor-Phase and Byers molecular filtration has been referred to as the "gold standard" in odor control by the Planning Commission and whose experience/results (zero odor complaints since installation of Byers molecular filtration systems) bears that out.

I have reviewed the Board's agenda letter dated April 23, 2024, including the Summary of Cannabis Odor Abatement Requirements and Components of Approved OAPs. In particular, I have examined Table 2. - *Approved Coastal Zone Cannabis Operations Required to Implement OAPs* and am struggling to reconcile the number of operators purporting to use "Vapor-Phase" odor control with our active customers list and the County's strict requirements for using this particular type of technology. My reading of this implies only one

of two conclusions: either those non-Byers customer cultivators identified as utilizing “Vapor-Phase” and being currently active are misusing their original Byers Scientific Vapor-Phase equipment by virtue of employing incompatible odor neutralizer products or they have installed completely new systems that comply with County requirements, including monitoring and reporting. If the latter, this begs the question of whether true “Vapor-Phase” equipment is being utilized given our patented technology and proven SCADA platform.

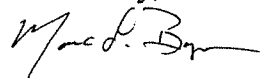
In the event operators are using any odor neutralizer in their Byers systems other than products deemed compatible by our company, they will not only have voided any warranty on the equipment but potentially caused irreparable damage. Our systems are designed specifically to work with particular products and the use of any non-Byers Scientific approved odor neutralizer would be akin to putting diesel fuel through a gasoline engine. The misuse of Byers “Vapor-Phase” systems therefore necessarily calls into the question not only efficacy but also reporting compliance as those systems are no longer active on our monitoring and reporting platform.

With respect to the use of molecular filtration and concerns expressed about electrical requirements, clearly there is a power supply deficit in Carpinteria and surrounding areas of Santa Barbara County. That said, our experience does not necessarily indicate that this has to be an obstacle to installing molecular filtration units. I would respectfully point out that apart from my company’s products, the other “scrubbers” identified in the staff report as being utilized in Santa Barbara County do appear to have a significant power draw. However, our experience would indicate that power requirement concerns may be unwarranted in many instances and it truly does depend on the type of product being deployed. Case in point, Farmlane utilizes sixteen (16) 6,000 CFM and four (4) 4,000 CFM carbon scrubbers across cultivation, processing and other applications and have experienced no power challenges while utilizing step-up transformers. This can be attributed to the fact that our molecular filtration units use less power than the other units represented in the report and our design and engineering allows for the use of fewer units to treat the same volume of air.

Finally, price does not necessarily have to be a barrier to improved odor control. Our research indicates that our products are less expensive than many of our competitors without sacrificing efficacy (our scrubbers were subjected to rigorous testing by SCS engineers with a documented 94% odor detection reduction), and additionally we have partnered with an industry-leading equipment financing company to offer very affordable financing.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Marc L. Byers
CEO | President
610-213-3831