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CV: property 003-765-300

Mr Jan Thingsted
Columbia Shuswap Regional District
555 Harbourfront Drive NE
PO Box 978
Salmon Arm, BC V1E 4P1

January 17, 2017

RE: Cannabis cultivation facility in Falkland, BC

Dear Mr Thingsted

Please note that Cloud Holdings Inc. has applied for cannabis cultivation, processing and medical marijuana sales licenses and will be operating on land located at:

4319 Colebank Road, Falkland, BC, V0E 1W1

Sincerely

Greg McCaffrey
Cloud Holdings Inc.
201 – 1233 West Cordova St.
Vancouver, BC. V6C 3R1
604-343-4933

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Greg McCaffrey
Better Bud Botanicals Ltd.
4319 Falkland, BC
Ph. 604-353-4933
gregormcca@gmail.com

April 30, 2019

Columbia Shuswap Regional District
555 Harbourfront Drive NE
Salmon Arm, BC V1E 4P1

Re: CSRD policy regarding cannabis facilities on ALR land

Hello

I am requesting an amendment to a CSRD policy regarding growing cannabis on ALR land. Following is a description of the plan for cultivating and processing cannabis at 4319 Colebank Road, Falkland, BC.

Better Bud Botanicals Ltd has taken over the cannabis tracking and licensing system (CTLS) application from Cloud Holdings Inc. and is the sole applicant being considered for licensing by Health Canada. The application is for cultivation, processing and sale of medical marijuana. Our application has been in progress for about a year and was submitted on the CTLS April 2, 2019; but estimates for the time needed to go through the process vary from 6 months to something less than a year. Health Canada is backlogged with applications so they will not give estimates of the time it will take to process them.

The Falkland area property at 4319 Colebank Rd. is within the Agricultural Land Reserve so agricultural uses are permitted on the property in normal circumstances. However the Columbia Shuswap Regional District has a policy to prohibit cannabis production from ALR land but doesn't specify whether properties acceptable to the ALC would be exempted. The Agricultural Land Commission has excluded growing cannabis on ALR land if it is a non-agricultural use of the land. That designation of 'non-agricultural use' is directed at the method of growing rather than the cannabis crop itself. Their stated opinion is that, should the indoor growing facilities become obsolete for growing cannabis, they will likely be turned into an industrial or commercial use rather than to another agricultural use. That concern is primarily due to the buildings having concrete floors that permanently remove the land from cultivation and the buildings themselves being too high tech for conversion to barns. Due to the cannabis industry currently turning hundreds of thousands of square feet of land into concrete floored production facilities that concern is justified for the protection of land that could be potentially taken out of agricultural use. The ALC does permit the production of cannabis on ALR land providing it meets the 'agricultural use' regulations.

The Better Bud Botanical Ltd. land use will be agricultural according to the ALC regulations. After consultation with the ALC representative we were able to design a facility that conforms to the ALR regulations and still provides the degree of security required by Health Canada. There will be 3 temporary greenhouses and a permanent processing building built on 4 ground levels in the south west corner of the 80 acre property. We have already dug out 100' by 300' shelves in the hillside and will pack and level them while we wait for Health Canada's license approval.

The entire area is from the north driveway to the south property line and approximately 132 meters off the west property line. The greenhouses and processing building will be at least 33 meters from the west property line. The area will be security fenced and the main gate will be on the easement where the new road will leave the existing road. The south side property is unoccupied forest and the west property is unoccupied hay field. The property on the north is a chicken farm and their barns and residence are about a half mile from the cannabis facility, as is the eastern neighbor. The facility will all have high quality air filters so no

vented air will have odor.

The greenhouse design that conforms to the regulations is a metal frame roof with 12' steel stud walls sheathed with aluminum siding and stainless steel interiors resting on screw pilings. The entire building including the screw pilings can be dismantled and removed if desired. There will be no concrete floor or concrete footings and the plants will be grown in the dirt floor. The initial greenhouse design currently has 100% artificial light for security reasons but future greenhouses may have glass rooves if permitted by Health Canada. In that case precautions and measures will be taken regarding night time light diffusion.

A related processing building on ALR land is permitted to be 20% maximum the size of the area under cultivation. The area that we will have under cultivation for the 3 greenhouses will be 54,000 sq ft (3 x 60' x 300') and the processing building will be 10,500 sq ft (70' x 150'). The processing building will have a security office and sanitary change room at the entrance. All employees will need to enter through this building as no outside access to the greenhouses are available. (Each greenhouse has 4 waste storage rooms that are locked when not in active use cleaning the greenhouse of after-harvest waste). All movement within the processing building will be monitored via employee key cards and security cameras through a central computer. Additional cameras monitor the fence line and area inside the compound area. Motion detectors rather than constant lighting will be used at night.

The weekly traffic will be minimal outside the employees. Once all 3 greenhouses are operating we expect to require 80 employees including 35 full time employees. These jobs are well paying entry level agricultural worker employment as well as management and some contractual service positions. Most construction contracting will also be done with local companies.

We expect to make a single weekly delivery for all recreational sales and possibly a single daily delivery to medical marijuana patients. No sales transactions will occur on the property. Better Bud Botanicals is also working with our Quality Assurance Person, who is a local pharmacist, on a pilot project for smaller local pharmacies to supply their customers. That is a service that is currently lacking according to the QAP because many patients are not able to attend the larger pharmacies currently supplying the products.

So whether the CSRD intended the policy to restrict agricultural use of ALR land to grow cannabis or only non-agricultural use as with the ALC, Better Bud Botanicals Ltd. is requesting that the board amend the policy that does restrict it, or give Better Bud Botanicals an exemption so we can complete the project and be in compliance with all local bylaws and policies. We will be a significant employer in the Falkland area which will also draw employees from both CSRD and NORD. We are also intending to fill the void created with the change of law for local medical marijuana patients, who previously purchased cannabis from the now closed and illegal dispensaries, so we are helping make medical marijuana available to the clients' through their normal sources of medication. (Medical marijuana is used for pain and treatment of nausea for many cancer, arthritis, and lupus sufferers as well as in the treatment of seizures in some epilepsy patients). The development site is very private and no risk to the public is created and the facility is not near any public area where children could be. No land will be taken out of agricultural use and the processing building will conform to the ALC regulation regarding size. The plan will conform in its entirety to the ALC regulations. Please make the appropriate change to the policy to permit our facility.

Thank you

Greg McCaffrey

Better Bud Botanicals Ltd.
4319 Colebank, Falkland, BC.