

MacMhaol-onfhaidh ('Macaloney) Brewers & Distillers Ltd

response to

Market Sounding 14-059 – Crystal Garden Leasing Opportunity

22nd October, 2014

Introduction

This document is in response to the City of Victoria Market Sounding 14-059 – Crystal Garden Leasing Opportunity, and represents MacMhaol-onfhaidh ('Macaloney') Brewers & Distillers Ltd (Macaloney Distillers) expression of interest to locate its Victoria Caledonian distillery there.

Recently, Macaloney Distillers was awarded a \$2.37 million funding from the Federal Government, which together with other funding sources represents an inward investment opportunity of over \$xxx million for the City and will create 80 – 90 jobs in downtown Victoria, and generate \$xxx million per annum exports within xxx years eventually growing to over \$xxx million per annum exports, should the Crystal Garden be the final location.

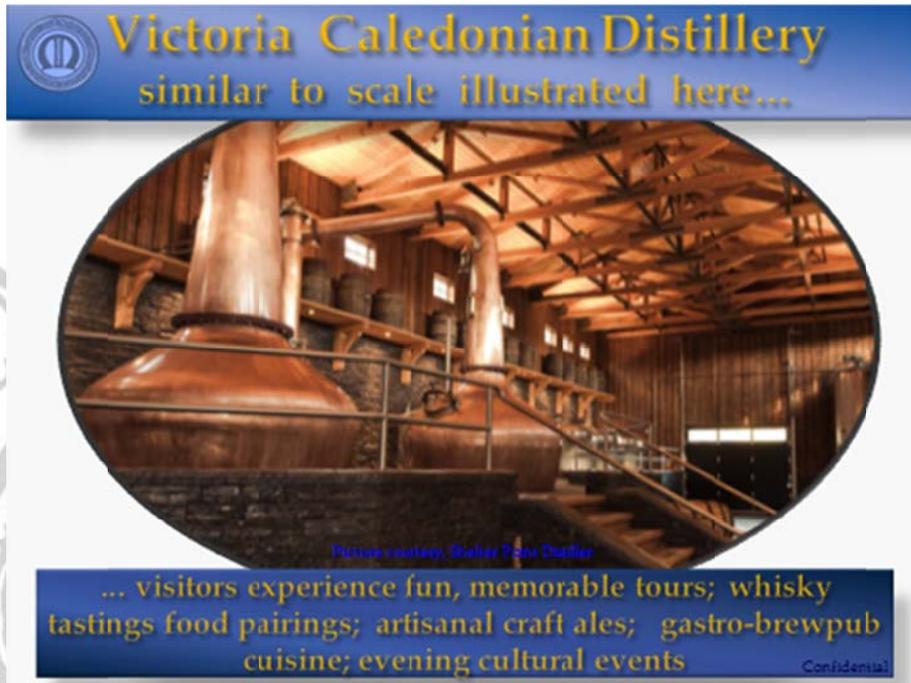
Macaloney Brewers & Distillers Background & Vision

Business Overview: Macaloney Distillers is set to become an international whisky business, encompassing a 'boutique-scale' single malt whisky distillery and destination tourism location, craft brewery, bistro-restaurant (with French-West coast-fusion cuisine), and high quality gift shop. It will be a destination with programmable event space that will support the Victoria Conference Centre (VCC) across the road. It will be known as the *Victoria Caledonian Distillery in the Crystal Garden*, and conduct tours for whisky tourists and convention attendees. Experiential tours will combine local history, heritage building history, and whisky history, with insights into artisanal brewing and distilling methods, led by experienced, knowledgeable and entertaining tour guides, followed by tutored product tastings and an introduction to our gift store and its range of high quality artisanal products. Located in the iconic heritage building, Crystal Garden, the experiential tours with their sense of history and culture will compliment Victoria's British-Canadian branding alongside other Scottish cultural destinations including the Hudson's Bay Company's Fort Victoria, Canadian Pacific's Empress Hotel and Steamship Terminal, the Butchart Gardens, Craigdarroch and Hatley Castles, the Victoria Whisky Festival (top 3 world ranking) and the 152 year old Victoria Highland Games & Celtic Festival. The distillery is named after Sir James Douglas' proposed name for his newly created province: 'New Caledonia', which the British government rejected in favour of 'British Columbia'.

Economic Impact and Viable Scale Necessary for Tourism / Conferences: As a major exporter of single malt whisky (\$xxx million per annum within xxx years, growing to over \$xxx million per annum) to over 30 countries globally, Macaloney Distillers economic impact will immediately lead to an inward investment of over \$xxx million including \$2.37 from the Federal Government, it will remove over \$260,000 per annum losses for the Crystal Gardens operations, lead to 80 – 90 downtown jobs, generate exports which the Greater Victoria Development Agency reports carry a value 3 times greater than other economic earnings, enhance City conferences and increase hotel occupancy rates, whilst increasing Victoria tourist numbers. It will also enhance the livability of Victoria for knowledge-based workers in the technology sector (see



Tectoria advert, adjacent).



World Class Team & Planning: Macaloney Distillers has been structured with world-class experienced management such as Dr. Macaloney, Mr. Nicholson, Dr. Swan, includes a group of independent board of directors comprising Canadian statesmen with relevant domain and excellent governance experience, such as Messrs. Art Froehlich (Calgary), Allan Scott (Edmonton), and Patrick Michaud (Oakville).

In addition to experiential destination tourism and whisky exports, the Victoria Caledonian distillery will integrate these with complimentary business units including regional craft brewery sales, a bistro-restaurant offering French-West-coast-fusion cuisine, and conferences (conferences, meetings, weddings and trade shows).

Dr. Macaloney having growing up in his elder brother John's haute cuisine restaurant in Scotland (Glenskirlie House and Castle) and having recruited John as an advisor, has assured Macaloney Distillers of direct experience in high quality restaurateurship and venue conferencing. Initially, an haute-French cuisine with Scottish fish and game restaurant, John, then build a programmable event space, and subsequently the first Scottish castle to be built in the 21st Century as a second destination venue (see images below).



Market Sounding Questions

- **Are the objectives provided by the City realistic?**

Yes, provided the City responds in a rapid manner, including implementation of its excellent intentions to expedite re-zoning, heritage and permitting approvals, for Macaloney Distillers to operate the Crystal Garden, and for other respondents to locate alternative locations for their intended operations.

- **Is this opportunity attractive to you or your company? Can you make a reasonable return from it?**

Yes, following two years of extensive location research within the City of Victoria and in the Saanich Peninsula, Macaloney Distillers identified the Crystal Gardens as its preferred location. Assuming fair market lease rates inclusive of utilities, Macaloney Distillers will be able to pursue its plans for exports exceeding \$xxx million per annum, establish 80-90 new Victoria-based jobs, and grow to become a Victoria Head-Quartered Canadian corporation.

- **What barriers to participating in this process do you perceive may exist?**

Timing, scale and location are critical issues. We have secured over \$xxx million in financing from over 200 private investors across Canada from coast-to-coast, and with the assistance of the Provincial and Federal Governments. Our investors and board are awaiting a resolution to the Crystal Garden.

Regarding scale, Macaloney Distillers has developed detailed floor plans for the Crystal Garden, from which it is clear we require an existing building with 25,000 – 30,000 sq ft floor space encompassing experiential tours, production area, programmable events space, restaurant and retail gift shop. Location is an equally important requirement.

- **What challenges would you expect to encounter if you were to participate in this process through to the end?**

Assuming that Macaloney Distillers becomes the chosen lessor for the Crystal Garden we would have to work very closely with City staff to quickly complete engineering assessments, negotiate a lease agreement, and commence the re-zoning / permitting process including neighborhood residents engagement and heritage approval.

- **What do you identify as significant risks in regard to this process? How would you proceed to mitigate those risks?**

The timing and approval of leasing, re-zoning and permitting are the biggest concerns. However, Macaloney Distillers have been very impressed by the commitment of the Mayor and Council, as well as new and existing City staff to streamline existing processes – not just in the context of this project but also in a general sense. A key to success in expediting this process would be the appointment of a senior City official as liaison with Dr. Macaloney. Someone with authority to engage and delegate to the various city officers involved, such as Joselyn Jenkins.

- **Are there any other issues or concerns you would address, that we may have missed?**

- **Overheating of Crystal Garden in summer**

The Crystal Garden is, in effect, a large greenhouse and it overheats in summer despite the air conditioning units previously installed. According to the recent Victoria Conference Centre Optimization Review, this limits the Crystal Gardens utilization for conferences. Furthermore, the electrical utility is at its maximum and cannot sustain any significant additional load including additional air conditioners. Thus, any tourism or other operation that expects to have people working and visiting during the summer will likely have difficulty in dealing with this issue.

- **Crystal Garden electrical utility at its limit and unable to bear significant additional loading**

As described above, according to the City engineer, the electrical utility is at its maximum loading and cannot bear any significant additional load. This is likely to be a serious constraint for other applications but Macaloney Distillers will provide a solution to this as part of its boutique-scale distilling operations.

- **Depressed retail in and around Crystal Garden**

Downtown street-front retail and office / commercial vacancies have been increasing in recent years and are close to a 10-year high, according to data from the Downtown Victoria Business Association. The area at the West end of Belleville, and on Douglas between Belleville and Humbolt has suffered in this regard with significant retail vacancies in the VCC and Crystal Garden. Furthermore, some of the Crystal Garden existing street-front leases represent lower quality and/or short term lease offerings that do not appeal to tourists or many residents. According the recent report on the VCC optimization by Criterion Communications¹, lower than expected retail revenues have failed to materialize as a key factor in supporting VCC finances.

- **Loss of hotel stays via reduced conferences?**

The Greater Victoria Hotel Association has expressed some concerns regarding the loss of the Crystal Garden as an overflow conference venue for the VCC, with the perceived threat of reduced hotel stays. Some facts on numbers of delegates versus hotel room nights generated should be borne in mind in order to provide some perspective on the modest contribution of the Crystal Garden to hotel occupancy:

According to data from the VCC for 2012², for 94,529 non-resident delegate days at the VCC and Crystal Garden, some 24,654 hotel room nights were generated. Thus, for each non-resident delegate stay the hotels see 0.26 hotel room nights. According to the Times Colonist, the all-time record high for delegate stays was 136,908 days in 2007 just before the global economic meltdown. Last year, according to Chemistry Consulting the VCC plus Crystal Garden achieved 103,813 delegate stays. However, in recent years increased competition from the Vancouver Convention Centre which made a large increase to its capacity and the recent opening of the Vancouver Island Conference Centre in Nanaimo as well as a major expansion of facilities at the Penticton Trade and Convention Centre, the opening of a major new centre in Ottawa, an expansion of capacity in Quebec city and large new facilities under development in Halifax and Winnipeg will negatively impact future bookings, which combined with the loss of US events and 'event repatriation' by US organizers, means that the VCC plus Crystal Gardens will have far greater challenges in reaching the record levels of 2007. It should also be noted that **the Crystal Garden only contributes 15% of total delegate days to the VCC**³, which is consistent with VCC data for Crystal Garden conferences for the 12 month period to August 2014 where 12 of the 15 events were for Victoria

¹ http://www.victoria.ca/assets/Document~Library/Victoria%20Conference_Centre_Optimization_Review_Redacted.pdf

² A Year in the Life of the Victoria Conference Centre

³ Times Colonist. February 25, 2014

organizations, 1 was for Duncan and 2 events were from Kelowna and Ottawa⁴. Thus, in 2013 the 103,813 total delegate stays would represent 15,572 (15%) Crystal Garden delegate stays, which in turn would represent just 4,049 hotel stays (at 0.26 hotel stays per delegate).

Similarly, if the VCC were able gain back the 33,095 delegate shortfall since 2007 in the coming years, despite its major new and expanded local and national competition, this would represent just 8,605 hotel stays for the VCC and Crystal Garden combined.

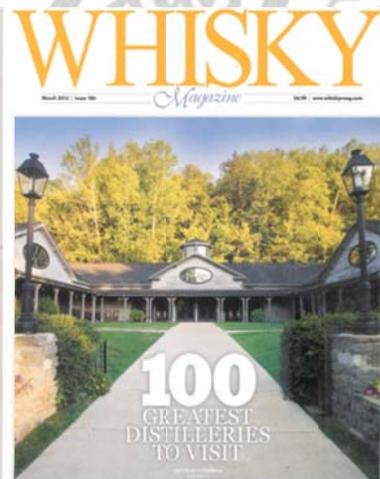
The Crystal Garden, ignoring previous lease expenses to the Province, is now losing approximately \$260,000 per annum due to its underutilization and high operating costs. A lease to Macaloney Distillers would not only remove this loss over the next few years but would actually generate revenues both from Macaloney Distillers and also from re-vitalized retail leases in both the VCC and Crystal Garden. This VCC / City fiscal challenge may not be in the purview of the hotels, but it does represent a serious fiscal issue for the City and ultimately represents a missed opportunity for the City to fund other priority issues important to its citizens, such as homelessness.

Putting aside the conference business for a moment, the outlook for hotels from the tourism sector⁵ looks very promising. August for example just saw an impressive 92.4% occupancy rate. This is the first time in 15 years, according to the Chemistry Consulting Tourism Report, that it has exceeded 90% and represents a 13.5% increase in Revenue per Available Room (RevPAR).

On a year to date basis, the RevPAR increased from \$87.95 in 2013 to \$95.62. Year to date tourism visitor numbers underpinning this performance included BC Ferries passengers up by 21,395, Airport passengers up by 64,140, and conference delegate days up by 1,504. Given the 0.26 conversion from delegate days to hotel stays, this is a mere 391 stays. Thus, conference derived hotel stay increases on a year to date basis were just 391 compared to 85,535 other tourists. Clearly non-conference tourist numbers are making a far more substantial contribution to RevPAR. The relatively minor impact of conference delegate days is further confirmed by historic conference delegate data versus hotel occupancy rate for the 4 year period between 2009 and 2012, as reported by the GVDA⁶. The hotel occupancy rate was remarkably constant at 62-63% despite gross fluctuations in conference delegate days between 130,078 and 74,922. Clearly the small 0.26 conversion rate of delegate days to hotel stays is being swamped by non-conference tourism derived hotel stays. Another contributing factor, may be that reported in the recent Victoria Conference Centre Optimization Review⁷, which observed that 'the attachment of the VCC to the Fairmont creates an understandable preferential advantage for a single hotel property...'.⁸

If tourism is more important to hotel occupancy than conference delegate days, what influence will a new tourism-distillery have?

Whisky distillery tourism has proven itself to be a major generator of tourism. The Scottish Whisky Association report on tourism⁸ shows that 1.3 million tourists visited 52 distilleries. Thus, on average, each distillery generated 25,000 tourists, and supported 130 in-direct jobs despite many of these not being designed for tourism and built in remote locations. By comparison the Scotch Whisky Experience in downtown Edinburgh receives 280,000 tourists per annum to its single establishment. Whisky tourism is



⁴ VCC data.

⁵ Chemistry Consulting – Victoria Tourism Bulletin August 2014

⁶ Greater Victoria Development Agency: <http://www.gvda.ca/about-greater-victoria/statistics/tourism/>

⁷ http://www.victoria.ca/assets/Document~Library/Victoria%20Conference_Centre_Optimization_Review_Redacted.pdf

⁸ Scotch Whisky and Tourism 2011. Report for the Scotch Whisky Association by 4 Consulting.

not just a Scottish phenomenon. Kentucky distilleries are seeing an average of 57,000 tourists. Thus, experiential whisky tourism will drive increased Victoria bound tourist numbers with their associated hotel stays.

Notwithstanding the modest impact of the conferences in the Crystal Garden upon hotel stays, relative to the significant impact of the tourists and investors generated by our distillery, the **Victoria Caledonian does see conferences as being an important part of our business plan for the Crystal Garden**. In speaking with the Conference Centre Manager, Jocelyn Jenkins, we have said that we will co-promote with the VCC to use the adjacent Victoria Caledonian distillery programmable events space, and it's tasting and tours as a unique differentiation for the VCC versus its growing number of BC and national competitors. We will design our operations in such a way that it maximizes the numbers of tour groups that can be accommodated as well as the numbers of convention attendees. Thus, **it is part of our business plan to maximize conferences which means that hoteliers will see enhanced hotel stays from both increased tourism and increased conferences.**

- **Heritage Building**

The Crystal Garden is an iconic heritage building and therefore the ideal use for it would be to re-purpose it as a flexible, programmable events space, which will be **more accessible to locals as a community gathering space, continue to be available for conferences, and become a show-piece that we can share with and use to attract tourists**. This must be accomplished whilst maintaining the fabric and appearance of the building, and profiling its great history.

- **Parking?**

The Crystal Garden has limited parking spaces on its own property. This may represent an issue for businesses with existing staff or a heavy component of office staff who have to relocate. However, for Macaloney Distillers all of our staff will be new recruits and work predominantly in production, tours or in the restaurant rather than in an office and will be recruited on the understanding that they need to use public transport or the adjacent under-ground parking at the VCC.

As for tourists, they will be predominantly walk-by tourists who have already come downtown to the Empress-Harbour-Museum area next to the Crystal Garden, or tour buses. In the latter case, there is an existing General Loading Zone immediately in front of the Crystal Garden that is time-limited with sufficient time to un-load, depart, return later and re-load the tour bus without excessive idling. Thus, the tour buses will be required to drop off and then remove to an acceptable parking area not in the downtown core, similar to existing practice of other tour buses coming downtown. Since Macaloney Distillers will have full time staff dedicated to developing tours and their logistics, as part of our arrangement with tour operators we will help coordinate the pick-up of the tourists once they are finished at the distillery.



- **Neighbourhood noise issues?**

Distilleries do not generate noise any greater than local traffic noise levels. In fact distillery noise has been measured at other distilleries of a similar scale and found to be in the 48-52 dB range.

Noise from our restaurant and conferencing activities will fall within the existing constraints and curfew of the Crystal Garden. The Distillery will never seek to operate as a night club. However, in order to protect

and preserve the safety of the Crystal Garden, our distillery assets, and of our departing patrons, Macaloney Distillers will arrange for a responsible security person, as well as enhanced security for special events such as weddings. This will include one or more individuals charged with a responsibility to prevent patrons, or non-patron loiterers, from loitering on the Aria side of the Crystal Garden and encourage them to move away from the area of toward the bus stands.

Macaloney Distillers will also engage a 'noise consultant' as part of its permitting process in order to ensure that we comply with all City requirements and also seek to mitigate, where feasible, other noise issues expressed by the local residents both current and anticipated. For example, the Aria residents expressed frustration with existing fan or AC noise issues that are within acceptable dB limits but represent a nuisance. Therefore, we would evaluate in partnership with the City and our consultant simple solutions to directing this nuisance noise away from the Aria.

- **Neighbourhood odour issues?**

These often represent an opportunity for concern and misunderstanding for local residents. However, there is considerable precedent with existing and recent distilleries of a similar scale and much larger scale to our proposed Victoria Caledonian distillery.

The Long Table distillery (Vancouver), Shelter Point distillery (Campbell River), and Victoria Spirits (Saanich Peninsula) have not experienced neighbourhood odour issues. In short, there is no reason for local residents to be concerned. However, in his meeting with residents, Dr. Macaloney had expressed his intention to investigate possible solutions that would be applied if odour were to become an issue after commissioning of operations. Since then he has re-considered this position, both in the context of ensuring that restaurant patrons and tourists are not put off whilst at the distillery, and also in the context of mitigating any possibility of odours that might offend the local residents whom, Macaloney Distillers hopes will become regular patrons (as occurred with Oak Bay residents who became Penny Farthing patrons after much concern and opposition). Thus, Macaloney Distillers is now committing to install a condenser system, to avoid the possibility of odours causing offence to local residents.

- **Skateboarders & drunks**

During the past few weeks we have had opportunity to pass by the Crystal Garden about six times during the day. It is our observation that the large concrete expanse between the Crystal Garden and Aria represents an anonymous concrete area. During these six occasions, we saw a skate boarder despite, and contrary to, the signage erected by the Aria (see adjacent), and on another occasion we were shocked to see, during day-light hours, as man leave the bus stand on Douglas in front of the Crystal Garden walk to the north end of the Crystal Garden and urinate against the building.



Macaloney Distillers plan to re-vitalize this concrete area by establishing an outdoor patio within the property line, planting a number of trees to break-up the concrete jungle appearance and make it more appealing, and between our outdoor patio activities (with appropriate curfew) and our staff / security people patrolling these back areas, we will turn this anonymous area in to a local asset with appeal for Aria residents and other downtown visitors alike.

- **Distillery warehouse mould?**

Distillery mould is a rare occurrence in modern distilleries. Such mould is a rare occurrence restricted to damp wine caves or old damp whisky warehouses. IT is suggested if anyone has concerns they should take

a trip to Shelter Point distillery near Campbell River and confirm for themselves the absence of mould. In fact mould is only occasionally associated with whisky warehouses and not at all with the area where mashing, fermenting and distilling occurs. The Crystal Garden would only be used by Macaloney Distillers for the latter production activities and not for whisky warehousing which will be done in a modern, damp-free warehouse not in the downtown core. Three other BC distillers, The Long Table distillery, Vancouver, Shelter Point distillery, Campbell River, and Victoria Spirits on the Saanich Peninsula have never experienced distillery warehouse mould.

- **Truck access**

The Crystal Garden presently has truck access via the back of the building away from the busy Belleville and Douglas street sides and between it and the Aria. This access has certain weight/size and time curfew constraints presently in force for conferences as well as the Spaghetti Factory Restaurant operations. The road bricks that make up the driveway also appear to have sustained some damage. Macaloney Distillers will work within and comply with current accepted constraints, and work with all parties concerned to address the damaged bricks concern.

- **Crystal Gardens reduces performance of VCC, creates a financial drain on the City, and stymies other citizen priorities**

Recently, an independent, third party report was commissioned by the City to report on optimization of the VCC, entitled Victoria Conference Centre Optimization Review⁹. Before the VCC took over operations of the Crystal Garden, the VCC was amongst the approximately 50% of Canadian conference centre peers who did not generate losses. Since its addition to the VCC, the Crystal Garden has generated losses up to \$645,976¹⁰ when being leased from the Province and now has losses of approximately \$260,000 per annum. This is an invaluable source of lost revenue that could be used for other citizen's priorities, including homelessness.

In the recent optimization review, an outlook of stagnant or reduced conferences due to a slow N. American economy and US organizers repatriating conferences, combined with greater than ever local competition (Vancouver expanded, new Nanaimo conference centre, expanded Penticton centre), and increased national competition (major new centre in Ottawa and expansion in Quebec City plus large new ones in Halifax and Winnipeg), give little encouragement for increases to previous delegate highs in 2007. Compounding this, the move from VCC profitability to loss has also contributed to them being underfunded such that their marketing budget is significantly lower than their Canadian competitors. This report concluded that:

"The primary recommendation in this area is therefore to take measures to re-stabilize VCC finances in the meantime...there needs to be a reset of the VCC financial equation to compensate for added costs and restore expectations for breakeven financial performance by giving consideration to changes that will enable the VCC to restore that break-even position...the most promising options for achieving this appear to be revisiting the terms of the Crystal Garden lease agreement and/or utilization given the experience of the last few years in order to improve its cost/revenue position..."

The City is to be applauded for addressing the Crystal Garden lease since this was contributing to the \$645,976 annual losses for the Crystal Garden. However, the lease cost was \$385,000 per year¹¹ which means there is still an approximate \$260,000 loss annually.

⁹ http://www.victoria.ca/assets/Document~Library/Victoria%20Conference_Centre_Optimization_Review_Redacted.pdf

¹⁰ Times Colonist. May 10, 2013, quoting conference centre data.

¹¹ Times Colonist, February 25, 2014

From the discussion above regarding the perception of lost hotel stays via reduced conferences, it is clear that the loss of Crystal Garden as a surplus conferencing venue for the VCC would not be a significant driver of hotel occupancy. The Times Colonist recently reported that only 15% of conference delegate days were attributable to the Crystal Garden. **However, the Victoria Caledonian distillery will continue to host conferences and will generate many tourists. Moreover, the Victoria Caledonian will lease 2,900 sq ft of Douglas Street retail in the Crystal Garden and through its major destination status help revitalize the remaining retail vacancies in the VCC and Crystal Garden.**

Conclusions

Macaloney Distillers would like to enter in to a long term lease agreement with the City of Victoria for the Crystal Garden. This comes as a result of a two year extensive location search including the criteria of:

- i) high traffic tourist location,
- ii) an existing building where we can quickly commence operations, and
- iii) a 25,000 to 30,000 sq ft area capable of co-locating our distilling, brewing, experiential cultural tours, gift shop with our spirits, craft beers, books and high quality branded clothing and glassware, restaurant with summer patio, and programmable event space for conferences, weddings and meeting.

Crystal Garden is the solution. Macaloney Distillers brings the opportunity for an Inward investment of \$xxx million including \$2.37 million from the Federal Government, and including provincial fiscal support, plus 80-90 new jobs either in Victoria or outside, and an export-based firm that will generate \$xxx million revenues within xxx years and ultimately up to \$xxx million per annum.

Macaloney Distillers will revitalize tourism in Victoria after the long term decline and loss of several destinations (Botanical Garden, Madame Tussauds, Subsea World, etc.) with new-age 'experiential whisky distillery tourism that in Scotland, Kentucky and Taiwan has been proven to attract 'whisky tourists'.

Our lease would address a key recommendation of the Victoria Conference Centre Optimization Review¹², by helping save the City approx. \$260,000 in losses, thereby freeing up money that can be repurposed for social or other programs that are a priority for citizens and Council. The perception of lost hotel stays from a repurposing of the Crystal Garden is unfounded. VCC data show that generally for the VCC each delegate day only translates to 0.26 hotel stays. Furthermore, the Crystal Garden only receives 15% of total delegates. Thus for the 12 month period to August 2014, of the 15 events booked for the Crystal Garden, 12 were from Victoria, 1 from Duncan, 1 from Kelowna and 1 from Ottawa. Thus, with so many local events, the Crystal Garden directly contributes very few hotel stays. However, an integral part of Macaloney Distillers plan will be to maximize conference opportunities in coordination with the VCC, because this business is complementary to our summer-focused destination tourism structure.

The Victoria Conference Centre Optimization Review unfortunately paints difficult times ahead for the VCC due to the fact that the N. American economy is slow, U.S., organizers are re-patriating conferences to the U.S., and the local BC and national Canadian conference centre competition has recently seen major strengthening. Vancouver Convention Centre made a large increase to capacity, Nanaimo recently opened its Vancouver Island Conference Centre, the Penticton Trade and Convention Centre did a major expansion, Ottawa opened a major new centre, Quebec city expanded, and large new facilities are under development in Halifax and Winnipeg.

¹² http://www.victoria.ca/assets/Document~/Library/Victoria%20Conference_Centre_Optimization_Review_Redacted.pdf

We will repurpose the iconic Crystal Garden heritage building, whilst carefully maintaining its appearance and fabric, making it more accessible to locals as a community gathering space, maintaining it as a programmable event space for conferences, and now using it as a focal point for a major destination tourism business whose Scottish cultural roots ideally compliment Victoria's Scottish heritage including the Hudson's Bay Fort Victoria, CPR buildings, Craigdarroch & Hatley Castles, Craigflower Manor and the Butchart Gardens.

Time is of the essence. Macaloney Distillers has secured over \$xxx million in financing from over 200 private investors from coast-to-coast across Canada, and with the assistance of the B.C. Provincial and Federal Governments. Our investors and board are awaiting a resolution to the Crystal Garden.

