

## **PLANNING AND DEVELOPMENT SERVICES STAFF REPORT**

**For Planning Commission Meeting of February 21, 2018**

**SUBJECT: 2730 Jackson Special Exception Use and Site Plan (2730 Jackson)  
File No. SEU17-006**

### **PROPOSED CITY PLANNING COMMISSION MOTION**

The Ann Arbor City Planning Commission, after hearing all interested persons and reviewing all relevant information, including an accompanying site plan finds the petition substantially meet the standards in Chapter 55 (Zoning Ordinance), Section 5:104 (Special Exceptions) and Section 5:50.1 (Regulations Concerning Medical Use of Marijuana), and therefore approves the 2730 Jackson Special Exception Use for a medical marijuana Provisioning Center. This approval is based on the following findings:

1. The proposed use will be consistent with the C2B Business Service District, which provides for commercial activities including retail establishments, offices, and personal services.
2. The proposed use will not adversely impact traffic, circulation, or streets and road intersections based on the location. Jackson Avenue provides access to the site, and the proposed use is consistent with other surrounding uses' traffic impact.
3. Through documentation submitted by the petitioner regarding waste disposal, inventory tracking, security, and other methods of operation of the facility, the provisioning center will be operated in a manner that will not have adverse impact to the neighboring properties, area, and will not have a detrimental impact on natural features.

This Special Exception Use approval is based on the following conditions:

1. The petitioner must obtaining both a State of Michigan Medical Marijuana License and a City of Ann Arbor Medical Marijuana Permit, and provide documentation to Planning Services within three years of the City Planning Commission approval date of this petition.
2. The petitioner operating a medical marijuana business at this address, within three years of the City Planning Commission approval date of this petition.

And that the Ann Arbor Planning Commission approves the attached Site Plan which demonstrates compliance with the applicable Special Exception Use standards as no physical development of the property is proposed.

### STAFF RECOMMENDATION

Staff recommends that the special exception use be **approved with conditions** subject to Planning Commission consideration because the proposed special exception use is of such location, size and character as to be compatible with the zoning district in which the site is situated; and the location and size of the proposed use, its nature and intensity, the site layout and access, and effect of the proposed use on public services would not be hazardous or inconvenient to the neighborhood nor unduly conflict with the normal traffic of the neighborhood.

### LOCATION

The site is located on the north side of Jackson Avenue between the I-94 overpass on and I-94 eastbound on-ramp.

### DESCRIPTION OF PETITION

The petitioner seeks special exception use approval to operate a medical marijuana provisioning center called Treecity in an existing building zoned C2B. Per the Zoning Ordinance, Chapter 55, C2B zoning allows medical marijuana provisioning centers with special exception use approval.

The 1.6 acre site contains two, single-story retail buildings at 5,600 and 8,100 square foot each. The petitioner indicates there are 71 parking spaces on the site, three of which are barrier free. The driveway and parking area are previously improved, with a single curb cut to Jackson.. There are no changes proposed to the site or exterior of the building. The two suites at the easternmost end of the larger, 8,100 square foot building, are proposed for use as the provisioning center.

### SURROUNDING LAND USES AND ZONING

	LAND USE	ZONING
NORTH	I-94	n/a
EAST	I-94	n/a
SOUTH	Cemetery	AG
WEST	Vacant (former Michigan Inn site)	R5

### HISTORY

This multi-tenant property was constructed approximately 40 years ago. The site has been in continuous operation with multiple tenants over the time since construction. Treecity has been operating at the location for three years.

### PLANNING BACKGROUND

The C2B Business Service District encourages a variety of uses. Medical Marijuana Provisioning Centers are a Special Exception Use in the District.

### **SPECIAL EXCEPTION USE STANDARDS**

The Planning Commission, in arriving at its decision relative to any application for a special exception, shall apply the standards shown on the attached petition.

In addition, the following information is required to be submitted for provisioning centers per 5:50.1(8) Special exception use regulations for medical marijuana facilities:

- 1) an operations statement that describes the life cycle of marijuana on site, and general business operations;
- 2) a safety and security plan that addresses marijuana, customers, employees, and the neighborhood;
- 3) a description of methods to be used to contain all odors within the building;
- 4) a waste disposal plan for marijuana; and
- 5) hours of operation.

This required information is attached, and additional information may be found in the complete project application package in Trakit at [www.a2gov.org/permits](http://www.a2gov.org/permits).

### **PLANNING STAFF COMMENTS**

Medical marijuana provisioning is a land use akin to general retail. Goods are located on site, and consumers, in this case state medical marijuana card-holders, purchase those goods and leave the store with them. This business has been operating on the site for three years.

The special exception use requirements as they are applied to this petition are broken down into general categories below.

West Area Plan: The master plan recommends commercial uses for this location, of which the proposed use is consistent.

Compatibility with the general vicinity: The use is not unlike the retail businesses surrounding it.

Consistent with the neighborhood and not detrimental: The business has proven over the last three years that the intensity and character of its activities are compatible with this commercial development. No complaints have been received by Planning and Building about this business.

Parking: 71 Parking Space are provided on the site, including 3 barrier free spaces, which exceeds the minimum required by code. Nine class C bicycle parking space are being proposed for installation at the southeast end of the larger building.

Pedestrian Safety: Pedestrian access to the site is limited. While sidewalks are maintained on the site, there is little pedestrian connectivity based on the site location.

Vehicular movement and traffic: The vehicle trips generated by a provisioning center are consistent with general retail uses found in C2B district, and surrounding land uses.

*Additional required Medical Marijuana SEU information:*

Operations Plan: The attached operations plan is comprehensive and does a good job describing operations and procedures.

Safety & Security: A thorough safety and security plan is attached. It should be noted that the state licensing process requires an extremely detailed and comprehensive security system. Staff does not ask for the particulars of provisioning centers' security plan since our documents are all public, unlike the state license permit application which is not.

Odor Control: Lack of odor control is the most frequent complaint heard by staff about provisioning centers. This petition includes a statement in the application attachment (page 8) about the filters and fans that will be used to control odor. Per the medical marijuana zoning ordinance, no facility may create noise, dust, vibration, glare, fumes, odors or electrical interference detectable to the normal senses beyond the property boundary.

Hours of Operations: As stated on the Cover Sheet attachment, hours will be Monday-Saturday, 11am-8pm, and Sundays from 12:00pm-7:00pm. Closed Independence Day, Thanksgiving, Christmas and New Years Day.

**DEPARTMENT COMMENTS**

No department made comments on the petition.

Prepared by Brett Lenart

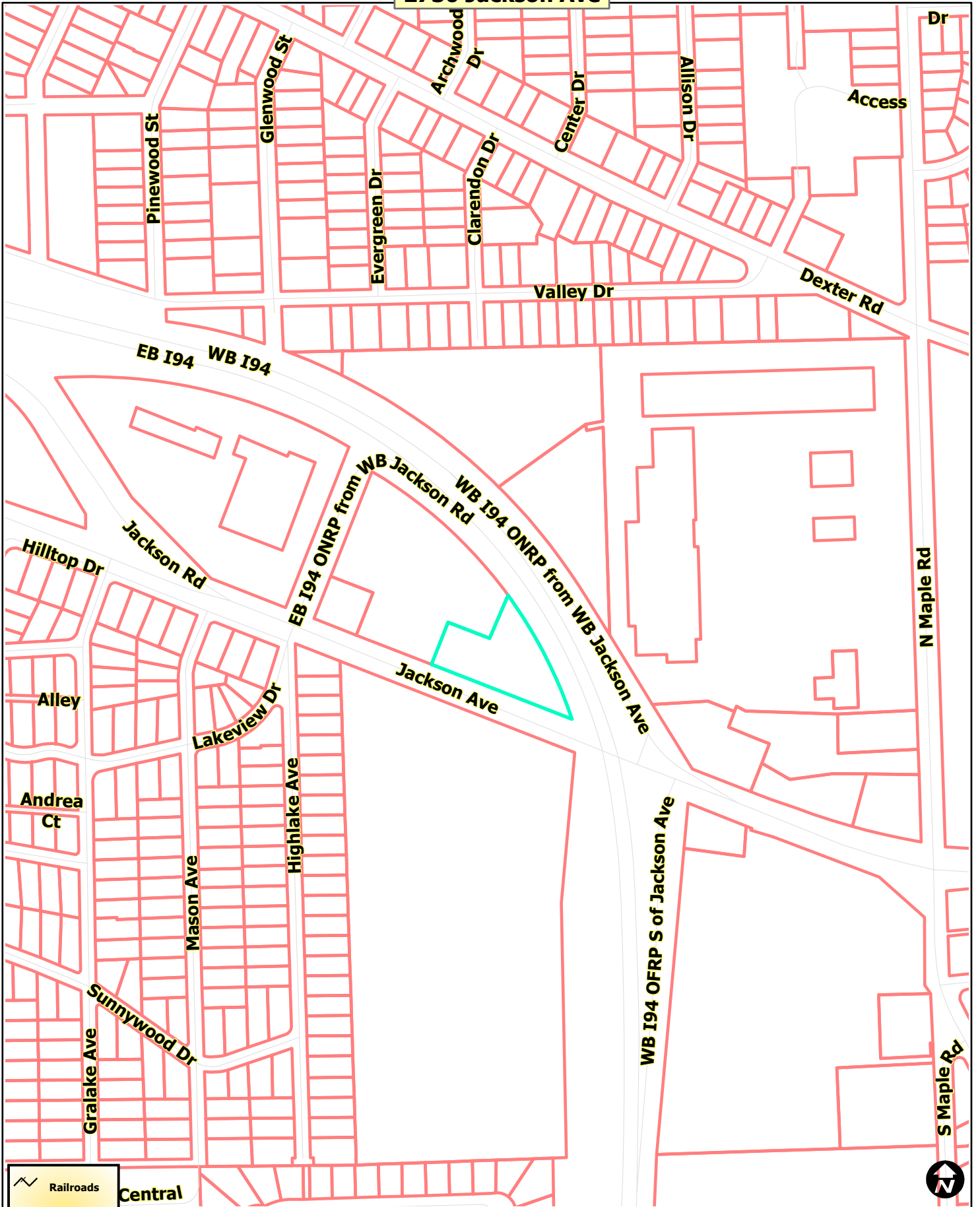
Attachments:   Zoning/Parcel Maps  
                  Aerial Photo  
                  [SEU Petition Application](#)  
                  [SEU Application Attachments](#)  
                  [Safety Plan](#)  
                  [Site Plan](#)  
                  [Floor Plan](#)

c:    Petitioner: Arbor West  
                  1555 S. Main Street  
                  Chelsea, MI 48118

          Petitioner's Agent: Alec Riffle  
                                  TreeCity  
                                  2075 W. Stadium Blvd., #297  
                                  Ann Arbor, MI 48103

          City Attorney's Office  
          Systems Planning  
          File No. SEU17-006

2730 Jackson Ave

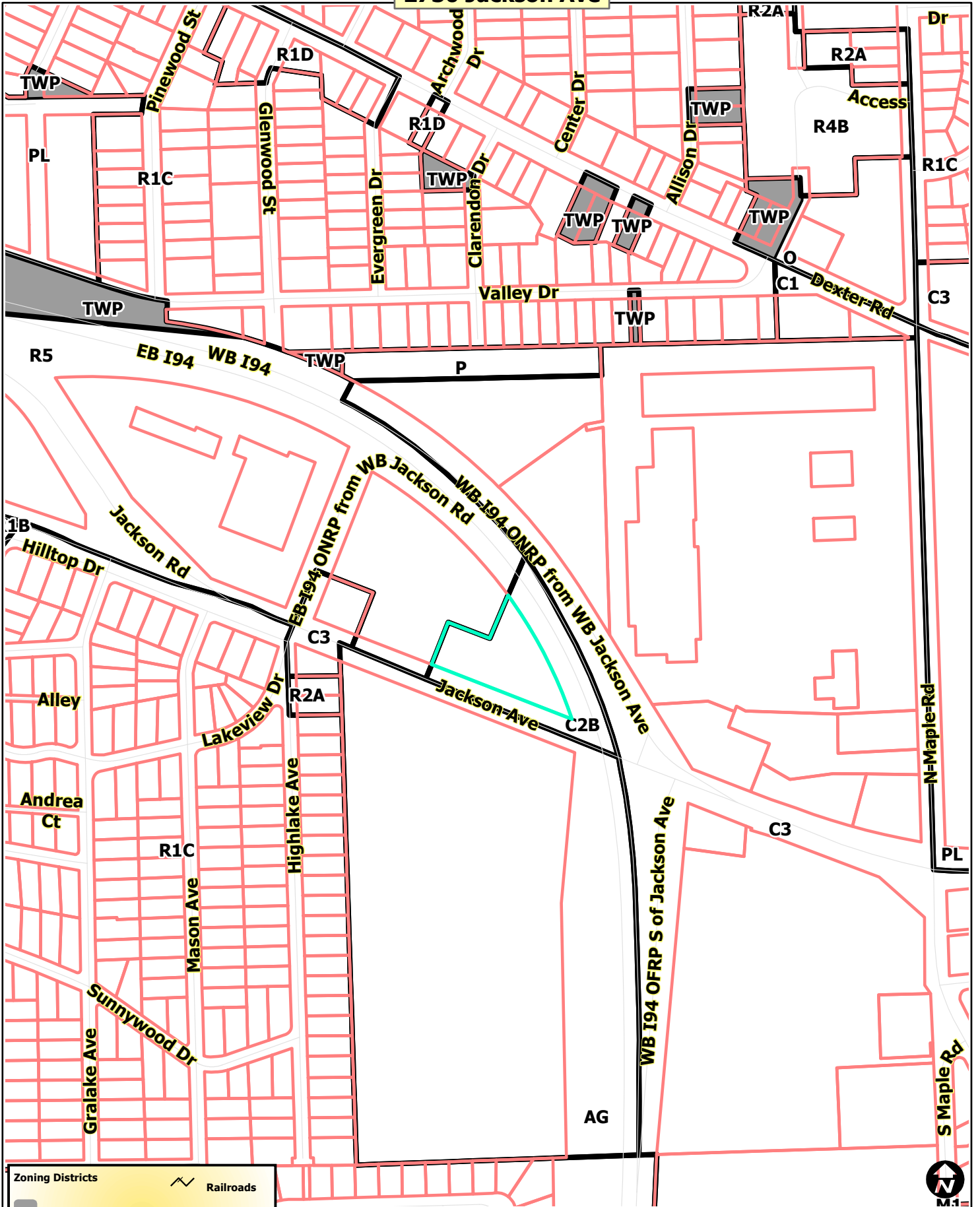


-  Railroads
-  Huron River
-  Tax Parcels



Map date 12/28/2017  
 Any aerial imagery is circa 2015  
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2730 Jackson Ave



<b>Zoning Districts</b>	Railroads
Township Islands	Huron River
City Zoning Districts	Tax Parcels



Map date 12/28/2017  
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2730 Jackson Ave



- Railroads
- Huron River
- Tax Parcels



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**2730 Jackson Ave**



-  Railroads
-  Huron River
-  Tax Parcels



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# City of Ann Arbor

## PLANNING & DEVELOPMENT SERVICES — PLANNING SERVICES

100 North Fifth Avenue | P.O. Box 8647 | Ann Arbor, Michigan 48107-8647  
p. 734.794.6265 | f. 734.994.8312 | [planning@a2gov.org](mailto:planning@a2gov.org)

### APPLICATION FOR SPECIAL EXCEPTION USE

See [www.a2gov.org/planning/petitions](http://www.a2gov.org/planning/petitions) for submittal requirements.

TO: Ann Arbor City Planning Commission

We, the undersigned, respectfully petition the City Planning Commission to approve this special exception use request as it relates to the property hereinafter described.

#### A. Legal Description

*(Give or attach legal description and include address of property)*

Legal Description: Exhibit A  
Address: 2730, 2732, 2734 Jackson Ave, Ann Arbor, MI 48103  
Zoned: C2B

#### B. Petitioner Information

The petitioner(s) requesting the special exception use are: *(List petitioners' name; address; telephone number; and interest in the land; i.e., owner, land contract, option to purchase, etc.)*

Alec Riffle (Member) on behalf of Ann Arbor Provisioning Center, LLC (A2PC d/b/a Treecity)  
2730 Jackson Ave, Ann Arbor, MI 48103  
(216) 543-0990, [alec@treecityannarbor.com](mailto:alec@treecityannarbor.com)  
Executed Lease, Exhibit B

Also interested in the petition are: *(List others with legal or equitable interest)*

No others with legal or equitable interest

#### C. Use Request

The applicant requests special exception use approval to permit the following use(s): *(state intended use)*

Michigan Medical Marijuana Provisioning Center special exception use subject to section 5:104

**D. Specific Standards**

The proposed use is allowed in accordance with the Schedule of Use Regulations, Chapter 55 (Zoning Ordinance), Section 5, Paragraph 10.21. Specify how the project meets all standards cited. Add attachment if necessary.

ORD-17-21

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**E. General Standards**

The proposed use or uses shall be of such location, size and character as to be compatible with the appropriate and orderly development of the zoning district and adjacent zoning districts in which the site is situated. Please explain how and to what extent the following standards are met by the proposal:

- 1. Will be consistent with the general objectives of the City Master Plan.

TreeCity's intended use will have no negative impact on Ann Arbor's Master Plan. Our desired location is appropriate for the intended use as allowed in the Medical Marijuana Zoning Ordinance and is determined to have no negative affect on the future physical development of the city and is committed to preserving the city's unique character.

- 2. Will be designed, constructed, operated and maintained in a manner that is compatible with the existing and planned character of the general vicinity.

TreeCity will design, construct and operate its facility in accordance with all applicable city, county and state codes/rules. The facility will maintain all exterior appearance as existing businesses in the area with no fixture or signage outside of identification that is not wholly consistent with the surrounding area.

- 3. Will be consistent with the general character of the neighborhood considering population density, design, scale and bulk; and the intensity and character of activity.

TreeCity is committed to maintaining the current design, scale and bulk of the facility as is currently in existence. It shall maintain consistency to all other businesses in the area and is well suited for the area, as has been apparent upon initial construction of the building (40 years) and operation of the business (3 years), without issue.

- 4. Will not be detrimental to the use, peaceful enjoyment, economic value or development of neighboring property, or the neighborhood area in general.

No communication or implication of nuisance has been reported from any business neighbors or their customers to date. TreeCity has driven an increase in business both for themselves and neighboring business. Value of the property has increased during TreeCiy's operation at this location.

- 5. Will not have a detrimental effect on the natural environment.

TreeCity will not have any negative impact on the natural environment. No function of the facility creates any waste outside of standard grey water creation through regular utility usage. To the contrary, our air purification systems have been noted to filter and eliminate particulate and air contaminates. It is also our mission to utilize Green technologies where ever possible (energy and waste reduction, reusable resources, recycling, etc.)

The location and size of the proposed use or uses, the nature and intensity of the principal use and all accessory uses, the site layout and its relation to streets giving access to it, shall be such that traffic to and from the use or uses, the assembly of persons in connection therewith, and the effect of the proposed use on public services and facilities, will not be hazardous or inconvenient to the neighborhood nor unduly conflict with the normal traffic of the neighborhood. Please explain how and to what extent the following standards are met by the proposal:

6. The location of and access to off-street parking and the safe provision for pedestrian traffic.

The facility is supplied with a large parking lot of 60+ parking spaces as was intended upon initial design and approval of the parcel. This area has minimal pedestrian traffic, however, appropriate and well maintained sidewalk and walkways are present and available.

7. The relationship of the proposed use to main traffic thoroughfares and to streets and road intersections.

No expectation of any special use of main traffic thoroughfares or streets are present. Jackson avenue has recently been widened and meets the needs of the active traffic. TreeCity's operation will have no effect on these uses.

8. Vehicular turning movements in relationship to traffic flow routes.

As a parcel containing multiple business suites, parking lots, driveways and turning movements are appropriate for their use. No impact is expected or has been observed.

9. The intensity and character of traffic and parking conditions on the site and in the general area.

Traffic on Jackson avenue is steady due to proximity of highway on and off ramps and to many large businesses such as car dealerships, hotels and entertainment facilities. TreeCity will and has no impact on this traffic. Parking is appropriate to other retail locations and far better than many (as commented on consistently by patrons)

10. The requirements for additional public services and facilities which will be created by the proposed use will not be detrimental to the social and economic welfare of the community.

No additional public services or facilities are required and thus will have no effect on social or economic welfare of the community.

#### **F. Variance Information**

In addition to the granting of the special exception use, the following variances from City regulations will be requested:

No other variances are required or will be requested.

Attached is a site plan of the property proposed for special exception use approval, showing the

boundaries of the property, the buildings, vehicular use areas, and all requirements set forth in Chapter 57 (Subdivision and Land Use Controls).

The undersigned states he/she is interested in the property as aforesaid and that the foregoing statements are true and correct to the best of his/her knowledge and belief.

Dated: 12-22-2017

Signature: *Alec S. Riffle*  
Alec S. Riffle

Ann Arbor Provsioning Center, LLC (d/b/a TreeCity)  
2730 Jackson Ave. Ann Arbor, MI 48103  
(Print name and address of petitioner)

STATE OF MICHIGAN

COUNTY OF WASHTENAW

On this 22<sup>nd</sup> day of DECEMBER, 2017, before me personally appeared the above named petitioner(s), who being duly sworn, say that they have read the foregoing petition and by them signed, and know the contents thereof, and that the same is true of their knowledge, except as to the matter therein stated to be upon their information and belief, and as to those matters they believe it to be true.



Signature: *Nick David Mirsky*

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\_\_\_\_\_  
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My Commission Expires: 06/23/2023



<b>Section</b>	<b>Requirements</b>	<b>Deliverables</b>
1	Operations Statement	1. Life-cycle of product through the facility 2. Storage 3. Deliveries 4. Cash Handling
2	Floor Plan	Drawing of Facility Layout
3	Safety & Security Plan	Addresses Customers / Employees / Neighbors / Offices / Businesses
4	Odor Control Plan	Air Filtration Methods & Equipment
5	Marijuana Waste Disposal Plan	Handling & Disposal of Product Waste
6	Days and Hours of Operations	Description of Proposed Days and Hours of Operation

## **Section 1 Inventory and Operational Flow**

### **Inventory Control**

All inventory control processes and procedures will be performed in a manner intended to accomplish 2 goals.

1. Conform to all regulations put forth in the MMFLA, the interim Emergency Rules and local or municipal ordinances for the city of Ann Arbor.
2. Demonstrate ability to meet standards of excellence utilizing best practices in the fields of Inventory Control and Supply Chain Management.

To address the first, we are committed to utilizing the Metrc statewide monitoring system for integrated marihuana tracking, inventory, and verification pursuant to the MMFLA and Emergency Rules. In conjunction we will be employing an additional Point of Sale system that has been listed as an approved product for integration with Metrc. This system will have functionality and ability to provide data analytics for inventory control to a standard that meets or exceeds the requirements of the State.

To address the second goal, it is the intent of the Applicant to utilize best practices of ISO 9001 2015, Lean/Six Sigma and Supply Chain Management methodologies in order to maintain a functional inventory system that is designed to first, prevent errors and second to immediately identify and correct errors should they occur.

### **Purchasing**

Inventory will be purchased by the Store Manager of the licensed facility . Purchases will only be made from a maintained list of approved vendors which will be composed only of state licensed Cultivators or Processors. Purchase Orders will be made to the vendor detailing quantity and sku of ordered items or product, it is



expected that an order confirmation will be sent by the vendor to the Store Manager containing communication of receipt of the Purchase Order and expected delivery date and time.

### **Deliveries**

Deliveries will be received in a secure location, separate from any public accessible areas and under 24 hour Video Surveillance and Manager oversight. Communication of any changes to delivery date or time must take place before hand and is the responsibility of the Vendor.

### **Inventory Receiving Process**

Upon delivery all items inspected for damage or defect. "Damaged" or "Defective" will include any items that do not have proper records of testing, non-compliant labeling, product past or too near expiration date, damaged in transport or otherwise, and any other criteria that fails to meet regulations set by the Board. All items recognized as "damaged" or "defective" will be refused delivery and recorded for reference and reconciliation of order. These refused items will be communicated to the Vendor.

All items will be counted and confirmed against Vendor issued packing or delivery slip, discrepancies will be communicated to the Vendor immediately for redelivery or reimbursement. All items received and approved will be entered into the Statewide seed to sale tracking system (Metrc) and the POS system.

### **Inventory Transferred to Vault**

All received and approved items will be transported to the vault from the receiving area by a Store Manager or other Key Employee. Both locations are under 24 hour video surveillance and are restricted access areas controlled by key card access that also logs all entries and employee badge numbers.

The Vault meets all local, state and federal requirements for vault construction (methods, materials, surveillance equipment).

All items received into the vault will be verified against receiving information and documentation.

### **Inventory stocked on the Consulting floor**

Inventory from the vault will be called on the Consultation Employees initiated via electronic inventory request. These requests will be recorded and logged through the communication system used to make the request. These inventory requests will be dictated by set trigger numbers for individual items to both limit the amount of product on the consultation floor at any given time and to help track inventory movements. These trigger numbers will consist of Kanban cards placed physically with inventory items, determined by data analysis of sales numbers and product usage.

### **Inventory Sold**

See "Patient Process" outline below

### **Cash drops**

Cash drops from the Consultation Floor take place every two hours. These are accomplished by preparation of secondary cash drawers containing starting amount of cash by the Store Manager within the vault, these are carried out to cash registers on the Consultation Floor and exchanged by the manager for existing cash drawers. The traded out cash drawers are returned to the Vault by the manager where money is counted and



verified against sales information and point of sale records for the individual cash drawer. The drawer is then balanced to contain starting cash drawer amount in preparation for the next cash drop and placed within the safe contained within the Vault.

### **Beginning of Day & End of Day Processes**

At the beginning of each day of day and the end of each day of operation cash and inventory counts are conducted by the Store Manager and verified against Metrc and the POS system. Discrepancies, if any, are investigated internally to isolate the errors. If any true discrepancies exist these are immediately reported to the State, in the case that theft or loss has been determined, local law enforcement is notified.

At end of day all floor stock will be returned to vault for overnight, secure storage (manager, 24 hour video surveillance, restricted access) and at the beginning of the following business day, the floor is restocked on the Consultation Floor.

### **Recalls and returns**

Any unused product can be returned to the facility for disposal at no cost to the patient.

Any product deemed damaged, defective, expired or otherwise unusable or unsafe may be recalled and will be properly disposed of according to the waste disposal process discussed below.

### **Operational Patient Flow Process**

#### **1. Prior to facility access**

- 1.1 Video surveillance on exterior of building to identify patient before entry to the facility
- 1.2 Patient may be denied entry through primary entrance door via wireless electronic locking mechanism
  - 1.2.1 A patient may be denied entry if they have:
    - 1.2.1.1 Breached company policies previously and has been banned
    - 1.2.1.2 Poses a physical threat to staff or patients
    - 1.2.1.3 Is exhibiting signs of intoxication or impairment that is not of a medical condition

#### **2. Patient enters Facility**

- 2.1 Internal 24 hour video surveillance captures all entries

#### **3. Reception Check in**

- 3.1 If new patient
  - 3.1.1 3 forms of Identification are presented to receptionist (MMMP card, Driver's License or other State/federal issued photo ID & third form of ID to verify previous two documents)
  - 3.1.2 Patient MMMP card is verified as active and valid
  - 3.1.3 Patient is given facility Membership agreement to read, initial and return to receptionist
    - 3.1.3.1 Membership agreement outlines applicable legal qualifications/requirements and company policies (anti harassment, anti threat)
  - 3.1.4 Patient information is entered into digital recordkeeping system by receptionist
  - 3.1.5 Consultant is notified electronically of patient present
  - 3.1.6 Patient waits in lobby for next available consultant
    - 3.1.6.1 A patient is not allowed into the consulting area unsupervised and escorted by a registered, qualified consultant.
- 3.2 If returning Patient



- 3.2.1 3 forms of ID are presented to receptionist.
- 3.2.2 Receptionist verifies that Patient MMMP card is valid and current
- 3.2.3 Receptionist notifies Consultant of patient present
- 3.2.4 Patient waits in the lobby for next available Consultant

#### **4. Consultation**

- 4.1 Consultant enters lobby and collects Patient ID
- 4.2 Consultant escorts patient into the physically separated consulting room
- 4.3 Consultant checks and confirms patient identification before returning identification to patient
- 4.4 Doctor recommendation is verified as valid and current
- 4.5 Consultation takes place
  - 4.5.1 Discussion of doctor recommendations / symptoms / desired relief
  - 4.5.2 Patient education of product / usage / dosage / medication tracking
  - 4.5.3 Order of product placed
  - 4.5.4 Verification of daily limit by consultant

#### **5. Sale**

- 5.1 Sale is entered into POS and Metric system
- 5.2 Money and Medication is exchanged
- 5.3 Medication is placed in an opaque, lockable and state approved transportation bag

#### **6. Conclusion**

- 6.1 Consultant escorts patient out of the consultation room to reception/lobby area
- 6.2 Video Surveillance records patient leaving facility (as required by the State)

#### **7. Refusal** A patient may be refused service if:

- 7.1 The patient's daily limit is exceeded
- 7.2 It is reasonably apparent that signs of drug abuse or addiction are present and the sale of medication may be detrimental to patient health
- 7.3 MMMP card is not valid or expired
- 7.4 Patient has violated company policies or state regulation

#### **8. All restricted areas are secured through electronic key card access and admittance can not be gained by any but approved and assigned personnel.**

### **Section 2 Floor/Site Plan**

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See Attachments - Floor Plan & Site Plan

### **Section 3 Safety & Security Plan**

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#### **Background**

Several key factors have been taken into consideration in the development of this security plan. Foremost





the team assembled to develop physical security plans, policy and procedure has over 50 years of federal law enforcement experience, policy development and implementation of high level security strategies. Physical security, protection against theft, loss or diversion and the deterring of unauthorized entry into the facility are the core responsibilities of our physical security and threat mitigation team. It is spearheaded by our retired United States Secret Service Counter Assault Team Leader and director of threat mitigation. The advanced technology being deployed and implemented throughout the grounds and facility, has been judiciously thought out utilizing skills and techniques acquiring from the interagency law enforcement backgrounds assembled.

## Approach

The approach used in generating this plan revolves around risk mitigation to which is the application of strategies and countermeasures to reduce the threat of, vulnerability to, and/or consequences from an undesirable event. Given the local, state or federal requirements specific asset or mission, there are five strategies available to mitigate risk:

- Avoidance
- Reduction
- Spreading
- Transfer
- Acceptance

Risk mitigation is accomplished by decreasing the risk level by eliminating or intercepting the adversary before they attack, blocking opportunities through enhanced security or reducing the consequences if an attack should occur (i.e., detect, deter, defend, defeat). Real world examples tell us that, the best strategy for mitigating security risk is a combination of three elements:

- Decreasing Threats
- Blocking Opportunities
- Reducing Consequences.

Prescribed solutions for the identified risks enhance three facets of this security plan:

- Policies and Procedures
- Physical and Advance Electronic Security Systems
- Security Personnel.

The layered approach to security provides outer, middle and inner protection. The outer layer of security relies heavily on traditional barriers such as LED lighting, electronic exterior door locking mechanisms, glass break sensors, perimeter analytic video surveillance and intrusion alarms. The middle layer of security consists 24 hour video surveillance, key card access restricted areas and externally monitored panic/robbery alarm buttons. The inner protection layer is made up of further restricted access areas requiring key card access granted only to managers, vault construction, auto emergency dialers, fire and carbon-monoxide sensor alarms and panic/emergency alert buttons.

## Emergency Response Procedures

Response and notification to emergency matters is crucial in complying and adhering to the directives given by the State of Michigan. When emergency events occur within the operation, response and documentation of these events aide in learning from the occurrence. Most incidents can be deescalated and are not life threatening however; due to the sensitivity and compliance related to the production and sale of this product, it



has been deemed necessary to develop proactive measures and responses to anticipated events. Plans include:

- Property Breach
- Bomb Threat
- Severe Weather
- Medical Emergency
- Theft by Employee
- Theft by Visitor

### **Additional Security Considerations**

#### **Cash & Payment Security**

- Cash payments will be kept to a minimum however; in the event of cash transfer, each transport team member will be required to conduct the cash transaction in plain view of surveillance cameras and under direct visual oversight of a manager. The cash will be placed inside of a tamper proof, unmarked, lockable tote for transport. All available cash will be kept in a safe meeting or exceeding the state required size, weight and fire rating. The safe will be housed in the vault, which meets or exceeds construction and size requirements by the State. The vault is a restricted access area, requiring key card for entry. 24 hour surveillance and key card access records will log all movements and personnel in and out of the vault.

#### **Security and Emergency Training for Employees**

- Basic security training will be provided for all onsite based employees. This training will focus on awareness, applying the see-something-say-something model. Each employee will be required to go through security and safety training, of which is high level and independent of each other.

#### **Alarm System**

- The system shall provide coverage of all facility entrances and exits, rooms with exterior windows, rooms with exterior walls, roof hatches, skylights and storage rooms that contain safes.
- Duress alarm, which means a silent security alarm system signal generated by the entry of a designated code into an arming station in order to signal that the alarm user is being forced to turn off the system.
- Panic alarm, which means an audible security alarm system signal generated by the manual activation of a device intended to signal a life threatening or emergency situation requiring law enforcement response.
- Holdup alarm, which means a silent alarm signal generated by the manual activation of a device intended to signal a robbery in progress.
- Automatic voice dialer, which means any electrical, electronic, mechanical or other device capable of being programmed to send a pre-recorded voice message requesting dispatch, when activated over a telephone line, radio or other communication system to a law enforcement, public safety or emergency services agency.
- A failure notification system that provides an audible, text or visual notification of any failure in the surveillance system. The failure notification system shall provide an alert to the provisioning center within five (5) minutes after the failure by telephone, email, or text message.
- The ability to remain operational during a power outage and ensure all access doors are not solely controlled by an electronic access panel to ensure that locks are not released during power outage. The system shall be maintained and inspected annually by a qualified security vendor.
- We will employ a third party alarm monitoring service to ensure that all records and monitoring equipment can not be accessed or tampered with from within the facility by any staff member, visitor or



intruder.

- The alarm system and monitoring service also includes panic buttons placed at in the Reception area, Consultation room, Manager's office and a mobile unit worn by the Management employee on staff.

#### Video Surveillance System and Processes

- TreeCity will operate and maintain in good working order a 24 hour, seven days a week, closed-circuit television (CCTV) surveillance system on the premises. The design of the digital video recording system will encompass roughly 100TB of storage allowing for 90 days of onsite storage and 90 days of cloud based storage.
- The location of 14 total cameras interior and exterior are spelled out on the security drawing. The storage capacity for the camera system onsite will be approximately 100TB and the cloud based storage is unlimited. The system can also store key events for an infinite number of days onsite or in the cloud. The connection for ISP to remotely access and view video will be through a virtual private network (VPN).
- The facility will have a combination of fixed cameras, 1 pan tilt zoom camera with tracking capabilities. The security control center, located in the manager's office, will have one 32-inch LCD monitor that display the cameras throughout the facility.

#### Identification cards

- Identification cards serve multiple purposes on the grounds and inside the facility. Any person that is an employee of the facility must always have his /her photo ID clearly visible on his/her lanyard. All visitors to the facility must always wear his/her visitor ID badge in plain view and at all times be escorted throughout the facility. When gaining access to the grounds as an employee, the ID card grants permission to the grounds. It will also be used to access employee locker rooms. No employee shall start work until they have received their ID card.

#### Visitors & Visitor identification

- All visitors, technicians, maintenance personnel and any other persons not in possession of an employee identification card issued for the facility who require access must be recorded in the Visitor Log.
- Any person not in possession of an Employee Identification Card must receive authorisation and a visitors badge in order to access the licensed facility.
- To obtain a visitor identification badge, the visitor must provide a valid, government issued identification with a photograph.
- Once a Visitor's Badge has been issued the visitor will be escorted at all times while in the facility. The visitor will be required to have their badge visible at all times while in or on facility premises and will return the badge to the facility security personnel before leaving.

#### Background Checks - upon hire and every 6 months

- Before an employee can receive an Employee Identification Card, background checks by both the Michigan bureau of criminal identification and investigation and the Federal Bureau of Investigation must be conducted and submitted to the board for review. These background checks will include fingerprints via a "Web Check" provider agency and are to be sent directly to both bureaus as required by the state. The results of the criminal records check performed will be sent directly to the Board
- In addition to the initial background checks required for employment at the licensed facility it will be the policy of "the Company" to run background checks for all tier 2 and tier 3 employees on a repeating 6 month cycle to ensure that no disqualifying events have occurred in the previous 6 month period that the employer may not have been made aware of.



## Recordkeeping / Digital information security

- Internet Security - No department or PC (or MAC or workstation) is immune to compromise. A confidential high-level mitigation strategy has been developed to prevent the leaking of sensitive information through the web. It is an overall approach to reduce the risk impact severity and/or probability of occurrence.
- All records will be kept in a manner that is pursuant to regulations pertaining to the administrative rules. All hard copy documents and records required by the board to be kept on premises will be located in a restricted access area, accessible only to Tier 1 or Key employees. Back ups of these records will be kept digitally on an offsite liquid cloud storage facility, one of the most protected digital storage systems currently available.

## General Compliance

- To maintain 100% compliance to the State of Michigan guidelines, all policies and procedures are treated as living documents. The realistic fact that some security and safety scenarios cannot be foreseen allows for the documents to be modified as needed to adjust to certain situations.
- End of day operations at the facility will include setting of the alarm system and locking of all points of entry or exit including all doors and windows. Both the setting of the alarm and lockdown procedures will be conducted by a manager and will be confirmed through a double check system and sign off by a secondary member of staff. This activity will be guided by a step-by-step checklist procedure that will act as a record of the activity and retained in accordance with the recordkeeping and control plan put forth in this application.

## Section 4 Odor Control Plan

All air flow will be controlled in a closed loop system in order to eliminate odors or air contaminants (dust, particulates and pathogens) via passing through a series of HEPA and carbon filters both at external points of intake and internally to the facility.

External air intake will pass through carbon and HEPA filters to clean and purify air before moving into temperature and humidity control performed by commercial HVAC system. Incoming purified air will be circulated throughout the facility via approved ductwork and captured using a four stage industrial air filtration system consisting of a pre-filter, carbon filter, HEPA filter and a series of particulate and carbon filters before being reintroduced to the facility.

Filters will be monitored and replaced on regularly scheduled intervals based on manufacturer recommended information.

Our odor remediation system will exchange all air in the facility in 5 minutes or less. The facility will maintain a state of negative pressure so as to eliminate airflow that may introduce undesirable or nuisance causing odors external to the facility.

## Section 5 Marijuana Waste Disposal Plan

The State of Michigan is defining medical marijuana waste as anything that is not "Usable marijuana" such as the seeds, stalks and roots of the plant. We would also include any returned, expired or otherwise determined non-usable product also in this definition of "waste."



At the time of writing this application the state of Michigan has not published an approved disposal method for medical marijuana waste so we, the applicant, have reviewed the best practices found in other states to determine an appropriate and responsible disposal method.

The prevailing methods for disposal all start with the act of rendering the waste material as unusable. This is accomplished by first grinding up the waste material to a fine particulate then mixing to a minimum of a 50-50 mixture of ground material and other organic or inorganic materials.

If the mixing material is organic then it is recommended that composting through either continuous methods or batch methods be the disposal method either on-site or at an approved disposal facility.  
If the mixing material is inorganic or inert then it can be disposed of in a landfill, incinerator or other approved facility.

Until the state of Michigan approves local disposal facilities we have determined that composting on-site would be the best way to dispose of medical marijuana waste. It's the most ecologically sound method and it takes the burden off local resources for the transportation and management of the waste.

Our proposed medical marijuana waste disposal method shall be performed as follows:

1. All materials intended for destruction and/or rendered unusable shall be weighed and recorded.
2. Material awaiting destruction and/or rendered unusable shall be stored in a locked, restricted access area under constant video surveillance.
3. At time of destruction, grinding and mixing to no less than a 50% ratio of non-medical compostable material shall be performed under direct supervision and surveillance.
4. Immediately after destruction, the compostable mixture shall be transported to the composting or digesting location and incorporated into the system.

This shall be the proposed waste disposal method until such a time that either the State of Michigan or the City of Ann Arbor communicates an alternate, preferred method, at which time that method shall be adopted as the applicant's waste disposal process and adhered to.

## **Section 6 Days & Hours of Operation**

The proposed days and hours of operation for the provisioning center facility is as follows:

Monday through Saturday - 11:00 am to 8:00 pm  
Sundays 12:00 pm to 7:00 pm

Employees are expected to be present at the facility one hour prior to opening and one hour after closing of the facility daily for preparation, maintenance, closing and reporting functions.

Exceptions for the following holidays on which the facility will be closed :

Independence Day  
Thanksgiving Day  
Christmas Day  
New Year's Day

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12/19/2017

## **TreeCity Health & Wellness Security Plan**

### **Video Surveillance System**

TreeCity will operate and maintain in good working order a 24 hour, seven days a week, closed-circuit television (CCTV) surveillance system on the premises.

The design of the digital video recording system will encompass roughly 100TB of storage allowing for 90 days of onsite storage and 90 days of cloud based storage. The location of 14 total cameras interior and exterior are spelled out on the security drawing.

The storage capacity for the camera system onsite will be approximately 100TB and the cloud based storage is unlimited. The system can also store key events for an infinite number of days onsite or in the cloud.

The connection for ISP to remotely access and view video will be through a virtual private network (VPN). The facility will have a combination of fixed cameras, 1 pan tilt zoom camera with tracking capabilities. The security control center, located in the manager's office, will have one 32-inch LCD monitor that display the cameras throughout the facility.

### **Physical Security**

Using a layered security approach, outer, middle and inner perimeter, or 360-degree coverage, is the methodology by which access to the facility is granted along with tracking of products and controlling access to restricted areas. All building entrances and exits, parking lot areas, interior of the entire facility and the perimeter grounds of the facility are monitored 24/7 via digital surveillance technology, with 90 days on site storage and 90 days cloud based storage.

Electronic card access prevents breach of restricted areas where products will be stored. This eliminates the need for keys, provides digital record keeping that is tamper-proof and cannot be circumvented.

Once inside the facility customers must be escorted by facility associates until their transaction is completed and they depart the location. Access is restricted by electronic card readers, and doors will also incorporate door sounders in the event the door is propped opened that relay back to the security control room/manager's office.

Point of sale area, package pickup and reception desk will be under video/audio recording. Signage will be displayed alerting customers, visitors and associates of video/audio recordings in those areas. The reception desk will be equipped with a panic alarm, when activated, sounds in the security control center.

## **Alarm System**

The system shall provide coverage of all facility entrances and exits, rooms with exterior windows, rooms with exterior walls, roof hatches, skylights and storage rooms that contain safes. Duress alarm, which means a silent security alarm system signal generated by the entry of a designated code into an arming station in order to signal that the alarm user is being forced to turn off the system. Panic alarm, which means an audible security alarm system signal generated by the manual activation of a device intended to signal a life threatening or emergency situation requiring law enforcement response. Holdup alarm, which means a silent alarm signal generated by the manual activation of a device intended to signal a robbery in progress. Automatic voice dialer, which means any electrical, electronic, mechanical or other device capable of being programmed to send a pre-recorded voice message requesting dispatch, when activated over a telephone line, radio or other communication system to a law enforcement, public safety or emergency services agency. A failure notification system that provides an audible, text or visual notification of any failure in the surveillance system. The failure notification system shall provide an alert to the provisioning center within five (5) minutes after the failure by telephone, email, or text message. The ability to remain operational during a power outage and ensure all access doors are not solely controlled by an electronic access panel to ensure that locks are not released during power outage. The system shall be maintained and inspected annually by a qualified security vendor.

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