

From: sheldon goldberg <sheldon.goldberg1972@gmail.com>
Sent: Monday, December 14, 2020 11:40 PM
To: Markee, Kimberly <kmarkee@waterfordmi.gov>
Subject: Medical Marijuana Question

Greetings,

Section 10-306(e)(1) requires “[r]ecordings from security cameras shall be maintained for a minimum of sixty (60) days in a secure offsite location in the Township or through a service over a network..... referred to as a “cloud.”

May we back-up the recordings weekly for off-site storage, for an overall total period of 60 days?

If not allowed to do that, then, either: (1) we must back-up daily and store off site, which is not practical; or (2) use the cloud. Most provisioning centers will have 25 or more cameras recording all motion throughout the day. An expert provided a rough estimate that 60 days storage for 25 cameras would require approximately 9 to 12 Terabytes (TB) of cloud storage. A single TB = 1,000 gigabytes (GB). Therefore, the off-site storage will require the use of over 10,000 GB of cloud storage. Cloud storage is exceptionally expensive, as shown below. Having to store 60 days of video surveillance for 25+ cameras in the cloud could exceed \$10,000 per month.

Would it be allowed to back-up all videoweekly and store it off site for 60 days in order to avoid the substantial expense of cloud storage?

Also, the MMFLA requires storage for only 30 days, and doesn't require off site storage. Does the Township have any thoughts as to whether it is lawful for the Township to demand operational requirements in excess of those stated in the MMFLA? Section 333.27205(1) of the MMFLA states, in part, “A municipality may adopt other ordinances relating to marihuana facilities within its jurisdiction, including zoning regulations, but shall not impose regulations regarding the purity or pricing of marihuana or interfering or conflicting with this act or rules for licensing marihuana facilities.”

How is requiring twice the number of days of storage, and a means of storage far more expensive than provided in the MMFLA, not directly “conflicting with” the MMFLA?

Power

- One server and up to 25 computers
- Includes 500 GB cloud backup

Limited time offer! Originally \$66.67/month.

\$50.00

per month
billed annually

Ultimate

- Unlimited servers and up to 25 computers
- Includes 500 GB cloud backup

Limited time offer! Originally \$108.34/month.

\$83.34

per month
billed annually

Subscription length:

1 year **2 years** **3 years**

(Save 5%) (Save 10%)

Additional cloud backup: (\$99/100 GB per year)

- **10000 GB** +

Thank you,
Sheldon

TOWNSHIP RESPONSE

Section 10-306(e)(1) of the Ordinance is one of the standards, terms, and conditions that is incorporated by reference in and shall be a requirement of every facility license to be complied with at all times, "Unless modified by the Township Board in its decision to approve a license . . ." (quoting from the lead sentence of Section 10-306.)

Ordinance Section 10-301(b)(25) allows an Application for a facility license to include, "Any other information the Named Applicant wants the Township Board or Township Personnel involved in reviewing and providing reports on the application to consider."

Use of that option would be the proper manner for presentation of concerns and proposals such as presented regarding the requirements of Section 10-306(e)(1), or any other standard, term, or condition in Section 10-306.

The claim that Section 10-306(e)(1) requires storage for longer and at a location not specified in the MMFLA, is presumably referring to a R 420.409 promulgated under the MMFLA. With that Rule being reflecting minimum requirements, the Township does not agree its Ordinance requirements interfere or conflict with the Rule. The extent to which State minimum requirements are exceeded is one of the criteria the Township Board may base a license decision on under Ordinance Section 10-304(a)(13).