

Attachment 1

From: [Michael Garabedian](#)
To: [Morales, Sean](#)
Subject: Fwd: Hearing request for NIPA PCL 28 McDonald's 2nd Drive-Thru lane (for forward)
Date: Thursday, March 26, 2020 5:14:16 PM

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Some typos are corrected here.

Begin forwarded message:

From: Michael Garabedian <michaelgarabedian@earthlink.net>
Subject: Hearing request for NIPA PCL 28 McDonald's 2nd Drive-Thru lane
Date: March 26, 2020 at 4:50:43 PM PDT
To: "Morales, Sean" <smorales@roseville.ca.us>

Re: Placer County Tomorrow request for hearing

To:
Sean Morales
Assistant Planner
Development Services Department

In response to the Notice of Intent to approve the modification to the McDonald's Blue Oaks Boulevard Design Review Permit, Placer County Tomorrow requests a hearing.

It is essential for this hearing request that we see the original McDonald's application(s), file(s) and approval documents as we requested March 20. I understand that these do not exist for the modification request except for the plot plan you provided.

Issue delineation

The U.S. Department of Energy states that eliminating the idling of car engines would be the same as taking 5 million vehicles off the roads.

A decision on this modification requires attention and review by city staff to review and assess project approval resulting in increased:

- Air pollution
- Greenhouse gas emissions
- McDonald's Window worker exposure to exhaust
- Driver exposure to exhaust
- Heat
- Between lane car accidents.
- Small crowded fast food places that do not have enough tables for their

Attachment 1

usual walk-in crowds are a problem that should be addressed and not encouraged in this manner.

Also at issue are McDonald Roseville and State of California policies:

- The expansion is not in conformity with the approved permit
- There is no explanation about the history of this drive through and for what reason it is being sought to justify it
- McDonald's has changed its standards for double lanes, apparently enabling changes including adding lanes
- Restrictions on adding drive through lanes to existing facilities of all kinds are controversial and prohibited in some jurisdictions
- Drive throughs in new facilities are being prohibited in some jurisdictions
- Roseville and PCT want to encourage people to walk and bike.

Because of these environmental and city policy issues, we believe that a hearing is needed and that the permit modification should not be approved.

Categorical exemption

A CEQA Section 15301 Categorical Exemption is not allowable for this permit because it is not "negligible or no expansion of use."

"Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use."

Section 15301 also specifically prohibits a categorical exemption for a project that adds lanes:

"(c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety, and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes)."

No applicable exemption for the modification can be found in the Roseville CEQA Implementing Procedures Section 305

It doesn't appear that any alternations to existing buildings are exempted from CEQA under Section 305, and this involves a commercial building.

Attachment 1

The modification is not a building alteration as such, but is a change in the routing, passage and idling of automobiles.

There can be no doubt that this is an expansion of use. If it is believed to be negligible, to obtain a categorical exemption there at least needs to be an explanation of how this expansion is negligible.

The expansion could be expected to as much as double the automobile emissions by encouraging more cars to use the Drive Thru than do now. For example lines would appear shorter.

This permit has environmental impacts that need to be identified and addressed with mitigation.

Roseville CEQA Implementing Procedures

This is not a minor alteration to existing buildings

An initial step for this project is to complete an environmental assessment for it.

We asked for the application for this and its file. You have sent the plans and we understand that there is no application or file for it.

Automobile idling issues and impacts

Vehicle emissions contain gasses including carbon dioxide, which contributes climate change, as well as harmful pollutants nitrogen dioxide, carbon monoxide and hydrocarbons.

PCT consulted with an expert on vehicle idling, and this is his response:

I can assure you that when an engine is idling, even an up-to-date, state-of-the-art modern engine, its exhaust - before it reaches the catalytic converter(s) - is at its dirtiest, because no engine designed to produce a combination of power, torque and good mileage runs as well at idle as it does once you're rolling down the freeway, i.e. aside from cold engine start-up, the engine's dirtiest exhaust - HC, CO, NOx, PM10, etc. etc. - is while it's warming up. Once it's warmed up, and you're on your way, out on the road or freeway, driving at the speed limit, the emissions go down significantly, unless you have to slow down in stop-and-go traffic and/or stop completely for a stop sign or a red light.

Put this all together, and you have get heavier tailpipe emissions at idle at a stop sign or traffic light or waiting for someone in front of you to accelerate or turn, from a stop. But these are relatively momentary low-speed phases of a typical driving cycle. When you're driving through the incessant stop-and-go of a traffic jam, heavy traffic, a drive-through, etc. etc. the tailpipe emissions for that trip increase dramatically, because the catalytic converter(s) operate at its/their best when the hot exhaust is flowing steadily through the cat(s). Catalyst efficiency is affected by other modalities (unburned hydrocarbons in the exhaust when a cold engine is still warming up, stop-and-go driving in heavy traffic, etc. etc.). The

Attachment 1

catalyst(s) - some vehicles with a V6 or V8 might have two exhaust pipes, and therefore TWO catalyts, one in each exhaust pipe - performs optimally when the engine is fully warmed up, and you're running down the road at a steady speed.

With respect to low-speed tailpipe emissions at, say, a drive-in food joint or a drive-through bank teller window, the driver usually isn't aware of the problem until he/she takes the car in to be smogged. Once an engine is warmed up, all apparatus in the tailpipe(s) - catalytic converter(s), etc. - are also warmed up and fully functional. So, if the vehicle has been smogged, in theory they're probably doing their job, unless something is starting to wear out and malfunction, a catalyst, for example, and cats do wear out. They're subjected to extraordinary exhaust heat, so if you keep a vehicle long enough you will have to replace the cat(s) at some point. And that's one probable cause of the symptom you mention below, i.e. gradually increasing tailpipe emissions caused by a failing catalyst and/or a failing oxygen sensor (another device that is subjected to high temperatures and eventually fails), or any other device in the exhaust stream, which is a pretty hot and harsh environment. In my own experience, catalysts are fairly robust, but oxygen sensors do eventually malfunction on older, high-mileage vehicles. When that happens, it "sets a code," as we call it, turning on the Check Engine light. It also affects the fuel system's ability to deliver the correct air/fuel ratio, so it has to be fixed sooner rather than later.

Conclusion

Approving this modification could generate similar applications for other existing and new drive through of all kinds.

Stop and go waiting needs to be curtailed. If conditions on the permit that eliminate impacts are possible, such as waiting areas with controlled stop and go lights and mandated engine shut off until an order window is available, they might be considered.

Design requirements for new businesses or alteration of existing ones might facilitate drive up or drive through pick up after ordering a certain time period in advance so there is only one stop and go event.

But what about walking and enough tables for customers to be seated at tables while waiting?

We would like to review the files of the permit that is proposed to be modified and the DRPMOD.

We'd like an opportunity to discuss these issues with you.

Michael Garabedian
Placer County Tomorrow Co-Founder
916-719-7296