

## Public Comment

Re: Conditional use permit for **Raising Cane's**

Richard Slimbach, Monrovia resident (302 Oakcliff Rd.)

Aug. 8, 2021

### Introduction

I want to express opposition to the proposed conditional use permit to construct a new Raising Cane's fast-food restaurant with drive-thru service in Monrovia's CRS zone. Chickens are the most eaten animals in America, and Raising Cane's is the country's fastest-growing restaurant chain. Like Chick-fil-A, the chain has gained a loyal following by focusing on chicken fingers, bread, and crinkle-cut fries. Raising Cane's is a convenient and efficient business, serving tasty, convenient and relatively inexpensive foods. It also provides cities like Monrovia a solid source of sales tax revenue, while generating jobs and skill training opportunities for teens and young adults (although turnover-proof automation is quickly changing this). My opposition to Raising Cane's is based on four "dark sides" of the fast-food industry: (1) its major contribution to greenhouse gas emissions, (2) its cookie-cutter commercial aesthetic, (3) its deleterious effects on public health, and (4) its mistreatment of animals. Taken together, the decision to bring Raising Cane's to Monrovia would strengthen the grip of a car-dependent, ecologically harmful, architecturally imitative, physically and mentally poisonous model of food and eating, with a corresponding loss of reverence for the natural world. What follows elaborates these concerns. Questions for City planners/commissioners and Raising Cane's reps appear at the end of the document.

### 1. Greenhouse gas emissions

Reports of the United Nations' Intergovernmental Panel on Climate Change (IPCC) represent the "state of the science" on the climate crisis: why it is happening, how it is impacting every region of the planet, how much worse things are set to get, and, most importantly, what must be done to avoid the worst consequences. The most recent assessment (released 08/09/21) projects an irreversible 1.5 degrees of warming within one or two decades, 2 degrees of warming possibly before 2050, and 3 degrees before the end of the century—if emissions continue to increase. At 2 degrees warming, the frequency of deadly heat waves increases to 14 times; the frequency and severity of droughts—such as the one currently plaguing the Western US—occurs between two and three times as often; and water unavailability due to declining snowpack reaches critical levels. The IPCC has provided a summary for policymakers:

[https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_SPM.pdf?utm\\_source=mj-newsletters&utm\\_medium=email&utm\\_campaign=daily-newsletter-08-09-2021](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf?utm_source=mj-newsletters&utm_medium=email&utm_campaign=daily-newsletter-08-09-2021)

An important objective under CEQA is to reduce the risks of climate change that are connected to humanity's gargantuan output of greenhouse gases—currently about 2.6 million pounds of CO<sub>2</sub> *per second*. While climate change is global, its effects are local

and will continue to be felt throughout SoCal, including Monrovia. The only way to slow down and eventually reverse the warming is to reduce greenhouse gas (GHG) emissions wherever possible. In California—the fifth-largest economy in the world—80 percent of GHG emissions come from fossil fuel-powered transportation (41 percent), industry (23 percent) and energy-generation (16 percent). The GHG contribution of California’s agricultural sector (e.g., fruits, vegetables, nuts, livestock) is roughly 8 percent of the state’s total.

The CEQA Guidelines section 15064.4 directs lead agencies to address the analysis of GHG emissions of proposed projects and the project’s effect on climate change. The Raising Cane’s project may have a significant environmental impact if it could contribute substantially to an existing or projected air quality violation, or result, cumulatively, in localized operational emissions that exceed the State and Federal air quality standards in the project vicinity.

### *Vehicle idling*

Drive-thru windows at fast-food restaurants, pharmacies, and other businesses represent the convenience that many Monrovia residents crave. But the ease of idling in a vehicle while waiting for an order pollutes the air and negatively impacts the health of local residents. Every gallon of gas burned produces more than 20 pounds of greenhouse gases. Moreover, carbon monoxide in exhaust gases is highest when a vehicle is idling. In fact, idling for more than 10 seconds uses more fuel and produces more emissions that contribute to climate change than stopping and restarting the engine does. Conventional cars and trucks, no matter how fast they’re served, add to the already poor air quality of the San Gabriel Valley, while thwarting the carbon-reduction goals of SB 97 and SB 375.

On Friday, August 6, 2021, I timed the vehicle wait-time from entering the drive-thru lane to the delivery of food at Raising Cane’s two-lane drive-thru in Azusa at a non-peak hour (3:30pm), and then again at the Starbucks’ one lane drive-thru in Monrovia (Magnolia and Huntington) at 4:30pm. The average idling time per vehicle was 10 minutes at Raising Cane’s and 6 minutes at Starbucks.

### *Animal agriculture*

The raising of chickens, beef, turkeys, and hogs on factory farms has become an urgent problem for the environment. Even as CEQA pushes to reduce emissions and slow climate change, meat consumption, aided and abetted by fast food establishments, has risen dramatically. The raising and slaughtering of animals for food contributes as much as a third of the atmospheric methane that is hastening global climate change. Methane (CH<sub>4</sub>) is a potent greenhouse gas that is 25-28 times stronger than carbon dioxide (CO<sub>2</sub>), the primary GHG driving climate change in California. Enteric methane is produced when cud-chewing animals like cows break down organic matter. Beside emissions from livestock production, animal agribusiness is also the leading cause of habitat destruction and species extinction. The story is simple but disheartening:

- Water and land are used to grow corn and soy crops to feed animals.
- Those crops and water are used to bulk up animals for slaughter.

- The animals emit noxious levels of CO<sub>2</sub>, methane gas, and excrement that pollute our air and waterways.
- Animals are transported in semi-trucks and processed in large factory-style slaughterhouses, and their body parts are packaged and shipped across the country.

While beef production has the direst environmental impacts, creating about four to eight times the emissions of pork, chicken or egg production per gram of protein, chicken production still has a significant GHG impact. “Swapping beef with chicken,” writes Leah Garcés, the president of Mercy for Animals, “is akin to swapping a Hummer with a Ford F-150, not a Prius.” Gidon Eshel, a geophysicist at Bard College who studies how human diets affect the environment, recently stated: “We can say, only slightly fancifully: You eat a steak, you kill a lemur in Madagascar. You eat a chicken, you kill an Amazonian parrot.”

The cumulative impact of expanding rates of vehicle idling within fast-food eateries serving up factory farmed meat concerns me and my wife as parents and grandparents. The growing density of drive-thru fast-food facilities in Monrovia heightens the risks of climate change that our children and their descendants will face if they choose to raise their families in SoCal. Building compact Monrovia neighborhoods where people have the option to “live lighter on the land” is contradicted by a fast-food culture dependent on fossil fuel-based mobility and animal agriculture.

It might be argued that a single project (Chick-fil-A, Raising Cane’s) has only an incremental contribution to climate change and biodiversity loss. But CEQA Guidelines, § 15064.4, subd. (b) addresses impacts that are *cumulatively considerable*, even if it appears relatively small compared to statewide, national, or global emissions. If the Monrovia Planning Department, as lead agency, chooses to address GHG effects in a CEQA document, it should be discussed in the context of the cumulative impact of the CO<sub>2</sub> and methane emissions produced through vehicle idling and the supply chains of previously-approved or proposed drive-thru fast-food restaurants. At present, these include Starbucks, Taco Bell, Burger King, Popeye’s, Jack in the Box, McDonalds, Tommy’s, Wendy’s, Chick-fil-A, and now Raising Cane’s. (I’m aware that a complicating factor is that there are currently no published CEQA thresholds or approved methods for determining whether a project’s potential contribution to a cumulative GCC impact is considerable.)

## **2. Commercial aesthetic**

Over the last couple of decades, I’ve watched the City of Monrovia invest in high-density, walkable residential development, Lyft subsidies, and bicycle striping leading to public transit (Foothill Transit, Gold Line). While the Friday Farmers Market represents a significant effort to foster access to regionally grown, organic produce, the Huntington Drive corridor is slowly becoming Fast Food Row. Quick-service restaurants continue to rethink their spaces inside and out, but for many Monrovia residents the predominance of fast-food eateries cheapens the commercial landscape. Double drive-thru lanes transform an iconic boulevard, as well as dining, into a production-line experience in which the point is to get it done and done quickly. The city is robbed of individuality by copy-and-paste

ultramodern design: a slated or paneled building with large windows surrounded by predictable landscape of non-native trees and shrubs. Increasingly, the only way to tell the difference between fast food chains is by the LED sign plastered across the building.

### **3. Public health**

Raising Cane's is a restaurant that serves chicken tenders, bread, fries, soda, and lemonade. Like Chick-fil-A, In 'n Out and Popeye's, it sells food that is high in sodium, fat and bad cholesterol, and low in nutritional value. (A single "combo" meal at Raising Cane's averages between 1,000 and 1900 calories—most of them from fats and carbohydrates.) Fast food has become almost synonymous with obesity, which has now reached epidemic proportions and is showing no signs of abating. Nearly 34% of adult men and women over the age of 20 are obese. Even more disturbing is that childhood obesity has *tripled* in the past 30 years. Poor diet and excess weight strongly correlate with insulin resistance, chronic inflammation, and other abnormalities. Fast food also impacts mental health, as it raises the levels of sugar, fat and other additives that cause the brain to inflame, while reducing the ability of the hippocampus to create new neurons. Children aren't born craving chicken fingers, wrinkle-cut fries, and Coke. Those are learned preferences. By approving a slew of fast food eateries over the last two decades, the City has unwittingly helped teach children that they should prefer food that's going to hurt them in the long run.

### **4. Animal welfare**

Raising Cane's is not transparent about where it sources its poultry products. Their main supplier appears to be Industrias Bachoco, or Bachoco, headquartered in Mexico. Bachoco expanded into the US by acquiring OK Foods, Raising Cane's primary poultry supplier, in 2011. The 2020 Business Benchmark on Farm Animal Welfare (BBFAW) reports that Chick-fil-A and Starbucks both rank in tier 5, indicating that they provide little or no information on their approach to farm animal welfare. Raising Cane's is not mentioned in the report, but as recently as April 7, 2021, OK Foods allegedly left thousands of chickens, on at least two trucks, without food and water for approximately 37 hours. The U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) documented this incident, along with the throwing of four live chickens, with a side-arm motion, into a cage at its slaughterhouse located at Heavener, Oklahoma slaughterhouse (see <https://www.peta.org/media/news-releases/feds-saw-birds-thrown-denied-food-and-water-peta-seeks-criminal-probe/>). This type of suffering and cruelty is normative at factory farms and is detailed in documentary films like *Glass Walls* by Paul McCartney (<https://www.peta.org/videos/glass-walls-2/>), *Dirty Birds* (2015) and *Indigestible* (2014), and in books like *Prisoned Chickens*, *Poisoned Eggs* by Karen Davis, PhD., director of United Poultry Concerns, and *The Ethics of What We Eat* by Princeton moral philosopher Peter Singer.

These materials explain the normative cruelty within intensive chicken production. Without intervention, raised naturally, chickens reach maturity at around five months of age and deliver the highest-quality meat around the age of two or three months. However, to reach maturity in a matter of just weeks, industrial farmers cram baby birds by the tens of thousands into giant, windowless sheds, and feed them with high-nutrient foods. Antibiotics are administered to avoid any health problems caused by the sudden

growth and harsh overcrowding. To make the bird appear bigger and heavier to the consumer, some poultry companies “plump” the birds by injecting raw chicken meat with salt water, chicken stock, seaweed extract or some combination. During “processing,” as the films reveal, birds are grabbed by their fragile legs, wings, and necks and violently slamming them into transport crates. After being shackled upside down, the bird’s throats are sliced open, then scalded, while still fully conscious and able to feel pain.

These practices are the norm, not the exception. True, the chickens sourced for Chick-fil-A, Raining Cane’s, and Starbucks suffer no more than those sold through Costco, Walmart or Vons. The question is whether the health and welfare of animals has any standing in the City’s vision of sustainable community. A growing and increasingly influential movement of philosophers, ethicists, law professors and activists are convinced that one of the great moral struggles of our time is the rights of animals.

Monrovia officials might know that drive-thru restaurants have been banned in 27 Canadian cities. Researchers who studied these cases (citation below) noted “health promotion” and “chronic disease prevention” as primary reasons for implementing the fast-food drive-through service bylaws. In recent years, numerous municipalities across North America have also adopted zoning bylaws that ban new approvals of fast-food drive-through services. Commonly proposed reasons for such policies include health promotion; maintaining visual appeal of the community; addressing noise, safety and traffic concerns; protecting the local economy; environmental considerations; and enhancing community walkability.

[Nykiforuk, C., et al. \(2018\). Adoption and diffusion of zoning bylaws banning fast food drive-through services across Canadian municipalities. \*BMC public health\*, 18\(1\), 137. \[https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5769538/pdf/12889\\\_2018\\\_Article\\\_5061.pdf\]\(https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5769538/pdf/12889\_2018\_Article\_5061.pdf\)](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5769538/pdf/12889_2018_Article_5061.pdf)

Banning the approval of new fast-food drive-through services is one policy option that the City may consider as part of a comprehensive, long-term, multi-pronged strategy to promote healthier food environments and improve population health. Doing so would communicate to Monrovia residents that the fundamental purpose of food is to *provide nourishment* that is fair, that is affordable, that is pleasurable, and that is as minimally damaging to the earth and other species.

### Questions for City Planners & Commissioners

1. Does the City intend to make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO<sub>2</sub>, methane, and other GHG emissions produced through vehicle idling and animal agriculture in relation to approved or proposed drive-thru fast-food restaurants, including Starbucks, Taco Bell, Burger King, Popeye’s, Jack in the Box, McDonalds, Tommy’s, Wendy’s, Chick-fil-A, and Raising Cane’s?

2. If so, what modeling tools or method(s) does the City consider most appropriate to assess potentially “cumulatively considerable” effects on GHG emissions of its already-approved or proposed drive-thru restaurants? (My understanding is that compliance with CEQA requires that the City: (1) identify and quantify the GHG emissions; (2) assess the significance of the impact on climate change; and if the impact is found to be significant, (3) identify alternatives and/or mitigation measures that will reduce the impact below significance. This is the case, even in the absence of clearly defined thresholds for GHG emissions.)

3. Has the City proposed a timeframe for the determination of significance (see CEQA Guidelines, § 15064.4, subd. (b).)?

### Questions for Raising Cane’s representative

1. What companies supply Raising Cane’s with its chicken products?

2. How does Raising Cane’s ensure that high standards of animal welfare are guaranteed throughout its supply chain? For example, are all chickens reared with natural daylight and enrichment, including perches and bales of straw? Are there any battery cages in the supply chain?

Thank you for considering these concerns and questions.