



November 9, 2020

City of Ann Arbor Planning and Development Services Unit
100 N. Fifth Avenue
Ann Arbor, Michigan 48107
Attn: Chris Cheng

Re: 2060 W. Stadium Rezoning (Z20-050), SEU (SEU20-001), and Site Plan (SP20-019)
Midwestern File No.: 20034A

Dear Mr. Cheng:

Midwestern Consulting, and the petitioner's development team, would like to provide additional information supporting the drive-thru special exception use based on safety considerations during the Covid-19 pandemic. While it is recognized that the Covid-19 pandemic is, hopefully, a relatively short term challenge, it is important that financial institutions have the infrastructure in order to be able to accommodate flexibility in service options for both the current pandemic as well as potential future situations that require alternatives to in-person services within the building.

Center for Disease Control (CDC)

The CDC outlines a Hierarchy of Controls that can be taken to limit exposure and risk to COVID-19. Engineering controls are defined as *isolating the person from the hazard through physical or mechanical means*. Drive-thrus are identified as one of these engineering controls. <https://ehs.cornell.edu/campus-health-safety/occupational-health/covid-19/covid-19-hierarchy-controls>

Additionally, the CDC outlines specific guidelines for bank employees. A recommended administrative control is to "*Encourage customers to use drive-thru banking services, automated teller machines (ATMs), online banking, or the mobile banking app for routine transactions that do not require personal assistance.*" <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/bank-employers.html>

Michigan Occupational Health and Safety Administration (MiOSHA)

MiOSHA has provided workplace requirements in the "COVID-19 Workplace Requirements for Retail, Libraries, and Museums" document specific to financial institutions. The document requires that companies develop COVID-19 Preparedness and Response plans that include engineering controls that should be in place to prevent employee exposure. An example of engineering controls includes installing a drive-thru window. The drive-thru window was identified in the Covid-19 guidance to retail workers. Additionally the document states that "*stores should also explore alternatives to lines*" that include allowing customers to wait in their cars... The document can be found at the following website: https://www.michigan.gov/documents/leo/COVID-19_Workplace_Guidelines_for_Retail_691406_7.pdf

Federal Deposit Insurance Corporation (FDIC)

The FDIC is an independent agency created by the U.S. Congress to maintain stability and public confidence in the nation's financial system. The FDIC issued "Frequently Asked Questions for Financial Institutions Affected by the Coronavirus Disease 2019 (Referred to as COVID-19)", which can be accessed here: <https://www.fdic.gov/coronavirus/faq-fi.pdf>. The document supports facilities to offer various ways to access banking services including ATMS and drive-thru lanes.

“Financial institutions can consider alternative service options to provide access to financial services. Financial institutions may want to remind customers of the various ways they can access banking services without physically coming to a facility, such as managing their accounts online, performing transactions at an automated teller machine (ATM), using telephone banking, or accessing a mobile banking application. Financial institutions could also provide information about how to use electronic payments, bill pay, and mobile remote deposit capture services.”

“The FDIC does not require an application to temporarily close a facility due to staffing challenges or to take precautionary measures. For example, some institutions may wish to limit foot traffic within a branch and provide services only through the drive-through lanes. The FDIC supports flexible approaches and encourages financial institutions to maintain a safe environment for their employees, reduce disruptions to their customers, provide alternative service options when practical, and reopen affected facilities when it is safe to do so.”

Additionally, news articles have been posted in recent months reporting that financial institutions have been working to re-open drive through facilities in order for customers to *“complete their transactions in the safety and comfort of their cars when the banks closed branch lobbies.”*

Newsmax Article: <https://www.newsmax.com/health/health-news/bank-drive-thru-online-banking-social-distancing/2020/07/07/id/976086/>

Wall Street Journal article: <https://www.wsj.com/articles/bank-drive-through-covid-pandemic-teller-drive-thru-window-reopen-11594049450>

Should you have any further concerns or have further questions, please feel free to contact Ted Hirsch by phone at 734-332-5303 or email at tph@midwesternconsulting.com.

Sincerely,
MIDWESTERN CONSULTING, LLC



Ted Hirsch, P.E.
Senior Project Engineer