



Dear Friends,

WE AT FLAGSHIP EXPRESS CAR WASH FULLY UNDERSTAND ALL CAR WASHES AND THEIR EMPLOYEES ARE CONSIDERED NON-ESSENTIAL FOR THE PURPOSE OF THE CITY AND COUNTY OF HONOLULU'S STAY AT HOME ORDER. ACCORDINGLY, OUR FACILITY IS CLOSED.

The discussion paper below is simply an argument that Car Washes are in fact Essential on many levels and are recognized as such in most States and municipalities around the country.

September 2, 2020 Rev3

The Professional Car Wash Industry --- Essential for Safety

The COVID-19 pandemic of 2020 has spawned many discussions and debates as to what determines an "Essential Business." Most would like to think all businesses are essential, because on many levels they are, including the support and livelihood for their family, and the livelihood of the employees and their families. Additionally, the business is participating in the economy by generating revenue and supporting vendors, suppliers, landlords, insurance companies, utilities, and local, State and Federal Taxes among many other expenses. So, if only some businesses are considered essential what is the qualifier? This may have been left to interpretation because some industries have failed to clearly identify the actual benefit and services they provide to their communities. **The Car Wash Industry** is one such industry that needs to fully explain and educate exactly why they are **ESSENTIAL**, and not just because they provide a clean, shiny vehicle. I will attempt to make this critical distinction between essential and non-essential for the Car Wash Industry.

There are two Federal Agencies that provide guidelines, one being the North American Industry Classification System (NAICS) that is part of the US Census Bureau for the purpose of collecting, analyzing and publishing statistical data related to the U.S. Business Economy.

1034A Kilani Ave. # 102 Wahiawa, HI 96786 - Office: (808) 621-0899 – Fax: (808) 622-4448

www.carwash808.com



More recently, the U.S. Department of Homeland Security under the Director of Cybersecurity & Infrastructure Security Agency (CISA) publishes an “advisory list” to identify workers and industries who conduct a range of critical services during a specific crisis – now COVID-19.

Car Washes are considered Essential by the two (2) federal agency listed below:

- a. NAICS 8111 Automotive Repair and Maintenance with Car Wash specific code under this category being 811192. The Maintenance provided by Car Washes for the safe operation of the vehicle is paramount and will be discussed in detail later.
- b. Many jurisdictions recognize Car Washes under the DHS CISA guidelines as “HYGIENE PRODUCTS AND SERVICES.

NHTSA Statement: *“The National Highway Traffic Safety Administration (NHTSA) issues Federal Motor Vehicle Safety Standards (FMVSS) to implement laws from Congress. These regulations allow us to fulfill our mission to prevent and reduce vehicle crashes.”*

The laws, rules and regulations issued by the NHTSA governing Vehicle Safety are recognized and enforced by Hawaii and clearly stated in the State of Hawaii Administrative Rules and City & County of Honolulu Ordinance. Specifically,

- State of Hawaii Administrative Rules §19.133. 2 HDOT Periodic Inspections of Vehicles.
- Periodic Motor Vehicle Inspection Manual date December 2017.
- City and County of Honolulu Revised Ordinance ROH Chapter 15, Traffic Code.

These safety requirements are enforced in Hawaii by way of the annual Vehicle “Safety” Inspection and includes the areas of concern discussed below:

WINDOWS, WINDSHIELD, REAR GLASS:

Visibility in all directions for the driver is crucial and is their greatest defensive driving tool. Dirty windshields, side glasses, rear window and rear-view mirrors, become dirty easily and need to be cleaned often. Dirty windows tend to scatter light rays causing glare and blinding the driver’s view. Every driver reading this can easily relate to this dangerous dilemma. Additionally, dirty windows and windshields become bothersome and dangerous when the sun is rising or setting, and at night from headlights of approaching cars and streetlights.

The rear glass of SUV’s and Minivans are particularly vulnerable becoming extremely dirty quickly during rain showers due to turbulence caused by the rear tires spraying wet, muddy road film over the entire rear of the vehicle, often reducing visibility to near zero. The use of the rear wiper-blade in such conditions is of little use and may even make the situation worse. The window must be washed, and a wet rag and a bucket of water isn’t

1034A Kilani Ave. # 102 Wahiawa, HI 96786 - Office: (808) 621-0899 – Fax: (808) 622-4448

www.carwash808.com



the best option, even if it was readily available. This is a very dangerous situation that needs to be corrected as soon as possible, and a quick trip through the Automated Car Wash is the choice for many drivers.

All windows must be kept clean and the Automated Car Wash is the best and quickest option used by thousands of drivers. **Reduced visibility due to dirty windows is a very serious impairment for the driver and can result in accidents. With the closure of automated Car Washes this dangerous situation is amplified.**

AUTOMOTIVE LIGHTS, SIGNALS AND ILLUMINATION DEVICES

These devices are critical for the safety of the occupants of the vehicle. Pedestrians also become very vulnerable IF they can't be seen by the driver of the vehicle due to dirty headlights!! Dirty cars not being washed results in diminished performance of headlights, turn signals, brake lights, reflectors, side marker lamps, and emergency flashers. It also diminishes the distance at which they can be seen as set by Federal, State, and County laws. Specific requirements for illumination and distance for every external light on the vehicle have been established. These requirements assume a CLEAN device.

HEADLIGHTS: The directive listed above clearly states that *headlights must be able to produce enough light to render clearly discernible persons or vehicles on the highway at a distance of 200 feet ahead.* When the plastic/acrylic cover protecting headlights becomes dirty from grit, grime, bird dropping, and road film, the light emitting from the headlight is greatly reduce. This build up happens quickly during rain showers as the vehicles in front are spewing water, dirt, and mud rearward directly into the front of the following vehicle's headlights. This is very dangerous, and many drivers do not even realize the degradation is happening. Luckily most drivers wash their cars often, so the issue is corrected. However, if Cars Washes are closed this situation will become perilous, and pedestrians must be especially beware because drivers simply will not be able to see them until it's TOO LATE!

BRAKE LIGHTS: The best protection from being "rear ended" by an aggressive driver or sudden stops due to an emergency ahead are the rear mounted brake lights. Brake lights are only illuminated when the brake is applied and in accordance with the directives listed above *"shall be plainly visible and understandable from a distance of 100 feet to the rear, both during normal sunlight and at nighttime."* Brakes light lenses covered with dirt, road film and other substances significantly decreases the visibility of the lights, and the crucial message they are communicating to the vehicle in the rear. This a disaster waiting to happen that destroys lives and families.

TURN SIGNAL LIGHTS alert oncoming traffic and vehicles behind of an approaching turn and the directives clearly states, *"a signal lamp or lamps indicating an intention to turn shall be visible and understandable during daytime and nighttime from a distance of 100 feet from both the front and rear."* Again, dirty turn signal lights that cannot be seen in time by following or oncoming traffic can be disastrous.

1034A Kilani Ave. # 102 Wahiawa, HI 96786 - Office: (808) 621-0899 – Fax: (808) 622-4448

www.carwash808.com



SIDE MARKER LIGHTS: Sometime called the T-Bone, as it alerts a driver that a vehicle has pulled across their path ahead. ROH Chapter Sec 15-19.9 states, ***“side marker lamps shall be capable of being seen and distinguished under normal atmospheric conditions, at the times lights are required at a distance of 200 feet from the side of the vehicle on which mounted.”*** Side Marker lights were mandated in the United States on January 1, 1968 and have undoubtedly saved thousands of lives from the horrific T-Bone crash. Two hundred feet is a sizable distance but at highway speed it rolls up quickly, so quick action must be taken to avoid the collision. However, side marker lights’ visibility degraded by a small percentage with dirt, grime and road film could be the difference between life and death. Couple this with the approaching vehicle having dirty headlights decrease the braking distance even more. T-Bone accidents often result in multiple fatalities in both vehicles. Our government saw fit half a century ago to address the carnage caused by such a collision, it should not be negated by a dirty car because Car Washes are not open and readily available.

HAZARD WARNING LIGHTS: Mandated January 31, 1967 for the purpose of warning approaching drivers of the presence of a vehicular traffic hazard requiring the exercise of unusual care in approaching, overtaking and passing. Two lights each mounted on the front and rear of the vehicle shall simultaneously flash amber or red lights. ***“The warning lights shall be visible for a distance of 1,500 feet under normal atmospheric condition at night.”*** The Hazard Warning light, by far is required to have the longest distance for visibility due to the seriousness of the situation that may exist ahead. But just like other lights, dirt, grime and road film present on a dirty car will diminish the effectiveness of this emergency warning system.

SENSORS AND CAMERAS: Advanced safety and driver-assist functions are standard or optional equipment on most vehicles now being manufactured. This enhanced safety feature depends on outside sensors (radar) and cameras to ensure the vehicle is maintained within lane boundaries, and predetermined car length distance maintained between vehicles traveling in the same direction in the same lane. When the sensors become dirty with grit, grime and road film, they fail to operate often without adequate notification to the driver. Manufacturers are well aware of the issue and are diligently seeking methods to relocate sensors to less vulnerable locations and even installing washer fluid devices. However, as reported in August 2018 Consumer Reports this approach is not necessarily effective due to the wide-ranging effects of Mother Nature. **Frequent visits to the Car Wash are the best defense against inoperative sensors due to a dirty vehicle, and to prevent serious accidents as a result.**

BACK UP CAMERAS SAVE CHILDREN’S LIVES. OBSTRUCTED AND DIRTY ONES DO NOT! Summary of ABC Article by Benjamin Siu May 2, 2018: *{In 2008 Congress passed the Cameron Gulbransen Kids Transportation Safety Act signed into law by President George W. Bush and ordered the NHTSA to issue by 2011 a standard for improving drivers’ ability to detect pedestrians behind a vehicle. The bill was named for Cameron the 2-year old son of Dr. Greg Gulbransen who in 2002 accidentally backed*

1034A Kilani Ave. # 102 Wahiawa, HI 96786 - Office: (808) 621-0899 – Fax: (808) 622-4448

www.carwash808.com



over and killed his son. NHTSA's proposed standard was stalled for several years. It wasn't until March 2014, when a coalition of advocacy groups filed a lawsuit against the U.S. Department of Transportation (of which NHTSA is a part), that a rule was issued, with a May 1, 2018, deadline for full implementation.}

This law mandated back up cameras on all 2019 model years and later. However, manufactures began to install backup cameras on many models before model year 2019. Backup cameras are now mainstream and depended on by millions of drivers each day. **Before the mandate more than 200 people in the U.S. were killed each year by a reversing vehicle, and more than 15,000 injured. Thirty-one percent (31%) were children under the age of 5.** My family suffered one of these horrendous loses in 2010 when my 2-year old grand-nephew was killed by a reversing pickup truck. Catastrophic for any family, and it should NEVER happen again. **Backup Cameras Are A Crucial Life Saving Device** and must be fully operational at all times. These cameras are typically mounted on the centerline of the vehicle at the rear most point. This can be the tailgate of a pickup, lift gate of a minivan or SUV and trunk lid of sedans, or any other place the manufacturer can strategically place the camera to ensure the driver has a clear view to the rear of the vehicle. As noted earlier the rear of the vehicle is very vulnerable to the buildup of dirt, grime, and road film and often impairs the backup camera to virtually zero visibility to the rear of the vehicle. Sadly, some drivers are unaware that it just needs to be cleaned, or for that matter they have no idea where the camera is located or what it looks like. Regular Car Washes will ensure this critical lifesaving device is always clean and ready to perform its purpose. **Another child should never die because of an inoperable rearview camera caused by dirt or other failures.**

Environmental Concerns: Some reading this may think or imply, well the owner of the vehicle should be responsible and wash it themselves. This doesn't happen for a number of reasons:

- Many residents are not physically capable of washing a vehicle. Others do not have the locations, material, or know how to wash their vehicle.
- Some do not have the time.
- Most Apartment, Condominium and Homeowner Associations have banned residents from washing cars for more than two decades. The ones that have not, will, as it's a violation of the Clean Water Act to allow runoff of such an activity into the Storm Drains that discharge into our streams, rivers and ocean.
- Professionalism of a modern high-tech Automated Car Wash with the latest in chemical and cleaning technology provides a superior environmentally friendly Car Wash.

1034A Kilani Ave. # 102 Wahiawa, HI 96786 - Office: (808) 621-0899 – Fax: (808) 622-4448

www.carwash808.com



- A vehicle washed at home with hose and bucket uses approximately 135 gallons of fresh water. A professional Automated Car Wash uses approximately 38 gallons of combination fresh, reclaim and RO reject water for each car washed.
- All water used in the Automated Car Wash is processed through an array of “separator and clarifier” tanks before it’s reclaimed or discharged into the sanitary sewer.
- All cleaners and chemicals used in a professional Automated Car Wash are environmentally friendly and safe for our employees, customers and the vehicles washed.

Summary: The development of this discussion paper is an effort to provide information that will help us all understand the incredible service provided by the Car Wash industry throughout Hawaii and the nation. The United States have more than 16,000 Car Washes serving its citizens, and consist of Full Service, Express Service, Flex Service (choice of full or express service), Self Service, In- Bay Automatics, Roll Overs, Chain and Belt Conveyors from 40 to 200 feet and an array of other specialty Car Washes.

The Car Wash is a staple in most communities that its residents depend on and appreciate. The family vehicle is typically one of the family’s largest assets and investment. Keeping the vehicle maintained with regular preventative maintenance and regular Car Washes is critical for the life and service of the vehicle. The Car Wash industry is proud to be part of their maintenance program.

As detailed above the Professional Car Wash is more than just providing a pretty clean car. It is also, and foremost about providing a safe vehicle for our customer and their family. Dirty glass, dirty lights, dirty signals, dirty sensors and dirty cameras equal accidents, injuries and fatalities. Therefore, a clean car is **ESSENTIAL** for the safety of millions of families that take to the road very day with the confidence that all safety devices are working flawlessly to protect their family. **Professional Car Washes are ESSENTIAL because they SAVE LIVES!**

Mahalo Nui Loa

Ricky E. Price, Chairman



1034A Kilani Ave. Suite 102
 Wahiawa, HI 96786
 808 226-1840
rprice@carwash808.com

1034A Kilani Ave. # 102 Wahiawa, HI 96786 - Office: (808) 621-0899 – Fax: (808) 622-4448

www.carwash808.com

