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Via Email

Leon Garcia, Mayor
Mark Joseph, Vice Mayor
Mariam Aboudamous
David Oro
Pierre Washington
American Canyon City Council
council@cityofamericancanyon.org

William He, AICP, Associate Planner
City of American Canyon Community
Development Department
4381 Broadway, Suite 201
American Canyon, CA 94503
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Re: SDG Commerce 217 Distribution Center (PL20-0008) – Recirculated Mitigated Negative Declaration and Conditional Use Permit

Dear Mayor Garcia, Vice-Mayor Joseph, Council Members Aboudamous, Oro, and Washington and Mr. He:

I am writing on behalf of Laborers International Union of North America, Local 324 (“LIUNA”) and its members living and working in and around the City of American Canyon regarding the Recirculated Draft Initial Study and Mitigated Negative Declaration (“MND”) prepared for the proposed SDG Commerce 217 Distribution Center Project (the “Project”). This comment letter supplements and incorporates by reference our previous written comments dated January 19, 2021, February 25, 2021 and May 3, 2021.

In our May 3, 2021 comments, we criticized the use of an alternative figure claiming to represent the average length of bicycle commutes in the vicinity of the Project. Previously, the consultant GHD estimated the average bike trip length at 34.6 miles, then 5.2 miles. GHD now also mentions a third alternative figure of 3.8 mile for the average bicycle commute to be expected from cyclists using the proposed 800-foot bike lane. (GHD Memorandum, pp. 9, 24 (March 21, 2021).) Traffic Engineer Tom Brohard, PE, has now had an opportunity to review the January 2015 AASHTO publication “Brief 14. Bicycling and Walk Commuting in America 2013,” referenced by GHD as the source of its 3.8 mile bike commute trip length. As Mr. Brohard explains, the footnote to the trip length number in the AASHTO report “indicates the bike commute distance is based on the Table 27 of the 2009 NHTS (National Household Travel Survey). Enclosed Table 27 does not break out trips or commute distances for bikes. The updated 2017 NHTS does not give bike commute distances either.” (Comments of Tom Brohard, PE, dated June 1, 2021 [attached as Exhibit A].) Nor is there any explanation why this nation-wide figure would apply to the area in the vicinity of the Project. As pointed out in LIUNA’s earlier comment, the furthest a commuting biker can travel north of the Project is 0.75 miles before they

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(cont.)

would have to head east and ride on SR 29 which the MND claims does not happen due to safety concerns. (Recirculated MND, p. 22.) It is entirely arbitrary for the Project to imagine bike commutes extending 3.75 miles north through undeveloped fields. In addition, the 2013 report using 2009 data does not likely reflect 2020 or 2021 bicycle use in the vicinity of the Project. As a result, and for the many reasons identified in LIUNA's previous comments, the MND's estimate of VMT reductions that would result from the Project's proposed 800-foot bike lane are highly exaggerated. There is substantial evidence of a fair argument that the Project may have significant transportation impacts. This potentially significant impact requires the preparation of an environmental impact report.

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For all of these reasons and those discussed in our prior comments, the MND is inadequate and an EIR is required to analyze and mitigate the Project's potentially significant environmental impacts. Thank you again for your attention to LIUNA's appeal and these comments.

Sincerely,



Michael Lozeau
Lozeau | Drury LLP