

**Elvyra F. San Juan**  
**Assistant Vice Chancellor**  
**Capital Planning, Design & Construction**  
401 Golden Shore, 2nd Floor  
Long Beach, CA 90802-4210  
(562) 951-4090 FAX (562) 951-4924

February 14, 2014

Mr. Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

RE: Comment Letter-2014 CEQA Guidelines Update, including LOS Alternatives

Dear Mr. Calfee:

The California State University (CSU) appreciates the opportunity to provide comments relating to topics to be addressed in the 2014 CEQA Guidelines Update. Based upon information provided in the *Possible Topics to be Addressed in the 2014 CEQA Guidelines Update*, and *Preliminary Evaluation of Alternative Methods of Transportation Analysis*, both dated December 30, 2013 and authored by the Governor's Office of Planning and Research (OPR), the CSU has the following comments:

Many of the Possible Topics are described in very broad terms and, therefore, at this early juncture, it is difficult to meaningfully evaluate the full extent of the effect upon lead agencies. For that reason, following release of the proposed specific changes in the CEQA Guidelines, the CSU will provide additional feedback to OPR.

As to the LOS Alternatives topic, the possible change in criteria for determining the significance of transportation impacts both inside and outside of transit priority areas could potentially have a major impact upon the CEQA process. We, therefore, strongly recommend that OPR conduct workshops or meetings with lead agencies throughout the state prior to development of a July 1, 2014 draft, in addition to the public review process that will be undertaken following public release of a draft document.

If you have any questions, please contact Dr. Steven Lohr, Chief, Land Use Planning and Environmental Review, Chancellor's Office at (562) 951-4120 or at [slahr@calstate.edu](mailto:slahr@calstate.edu).

Sincerely,



Elvyra F. San Juan  
Assistant Vice Chancellor  
Capital Planning, Design & Construction

ESJ:SL:pf

c: Mr. Wess Larson, Senior Legislative Advocate, Advocacy and State Relations, Chancellor's Office  
Dr. Steven Lohr, Chief, Land Use Planning and Environmental Review, Chancellor's Office

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