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

Comment Letter-Update to CEQA Guidelines Implementing SB 743

Dear Mr. Calfee,

The California State University (CSU) appreciates the opportunity to provide comments on the draft update to CEQA Guidelines. While the CSU recognizes the intent of developing new methods in CEQA Guidelines for measuring transportation impacts, there is substantial additional work on the draft Guidelines necessary to enable such a significant change to be successfully implemented. Recommendations are provided below which identify several areas which should be addressed prior to the finalization of an update to the CEQA Guidelines.

**Criteria for Transportation Impacts**

The proposed Guidelines indicate that a development project which result in vehicle miles traveled (VMT) greater than the regional average for the land use type may indicate a significant transportation impact (Section 15064.3 b1). In addition, the proposed Guidelines convey that the evaluation of VMT should reflect professional judgment based upon substantial evidence (Section 15064.3 b4).

The proposed language of the proposed Guidelines, as currently written, has significant elements which merit further consideration. First, it is not clear which agencies will be responsible for establishing the regional averages for land uses to be used in evaluating transportation impacts, as well as the process for lead agencies to review and comment on proposed regional averages prior to application to transportation analyses. In addition, it is essential that the proposed Guidelines clearly recognize and address projects with mixed land uses on one site which typically have lesser transportation impacts. Furthermore, the ambiguity of the proposed Guidelines in these and other instances will affect the ability of lead agencies to demonstrate that it has used substantial evidence in the CEQA process.

**Mitigation Measures**

The proposed Guidelines restate that mitigation measures must be considered when a lead agency identifies a significant impact associated with a project (Section 15064.3 c). However, it is not known at

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Channel Islands  
Chico  
Dominguez Hills  
East Bay

Fresno  
Fullerton  
Humboldt  
Long Beach  
Los Angeles  
Maritime Academy

Monterey Bay  
Northridge  
Pomona  
Sacramento  
San Bernardino  
San Diego

San Francisco  
San José  
San Luis Obispo  
San Marcos  
Sonoma  
Stanislaus

this time which type of metrics could be used in a VMT impact analysis to determine if mitigation measures reduce impacts to a less than significant level. Without this information, it is difficult to fully understand the implications of adopting VMT as the basis of transportation impact analysis. Furthermore, it could also lead to difficulty in demonstrating that the public agency has used substantial evidence in the CEQA process.

### **Recommendations**

It is recommended that the State Office of Planning and Research revise the draft Guidelines to address the above concerns and recirculate the subsequent draft for public review. In addition, it would be appreciated if the California State University is provided the opportunity to participate in further detailed discussions on the potential use of regional averages for land use types in transportation analyses, given the unique nature of university campuses (e.g., multiple land uses on one site).

Thank you for consideration of our recommendations, and we look forward to participating in the CEQA Guidelines review process.

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

Sincerely,



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ESJ:SL

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- Dr. Steven Lohr, Chief, Land Use Planning and Environmental Review, CSU Chancellor's Office