

DRAFT INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION
SAN DIEGO STATE UNIVERSITY
IMPERIAL VALLEY OFF-CAMPUS CENTER - BRAWLEY
BRAWLEY SCIENCES BUILDING
SCH NO. 2002051010
(AUGUST 2023)

[PROPOSED] MITIGATED NEGATIVE DECLARATION

Project Name: San Diego State University (SDSU), Imperial Valley Off-Campus Center - Brawley (Brawley Center), Brawley Sciences Building Project (Proposed Project).

Lead Agency/Project Proponent: The Board of Trustees of the California State University (CSU Board of Trustees), 401 Golden Shore, Long Beach, California 90802 / SDSU Facilities Planning, Design and Construction, 5500 Campanile Drive, San Diego, California 92182.

Prior California Environmental Quality Act (CEQA) Documentation: The environmental impacts associated with development of the entire Brawley Center, including the site of the Proposed Project, were evaluated at a program level of review in the SDSU Imperial Valley Campus Master Plan Project Environmental Impact Report (EIR) (SCH 2002051010), which also analyzed improvements to the nearby Calexico Off-Campus Center affiliated with SDSU. The EIR was certified and the Master Plan for the Brawley Center was approved by the CSU Board of Trustees in 2003. The Brawley Center Master Plan provides the framework for development of academic, sports/athletic, student services, and administrative facilities to serve a projected future enrollment of 850 full-time equivalent (FTE) students. The Proposed Project would not increase student enrollment at the Brawley Center above the previously approved 850 FTE projection.

Brief Project Description: The Proposed Project would involve the construction and operation of a new approximately 36,900 gross square-foot (GSF) building that would be 35 feet in height and include approximately 22,500 assignable square feet (ASF) of lower and upper division teaching labs, research and research services space, experimental fabrication space for collaborative work with future public and private partners, faculty/administrative offices, conference rooms, and mechanical, electrical and telecommunication support spaces.

The Proposed Project also would include approximately 61,200 square feet (sf) of on-site landscaping, including construction of bio-retention areas to capture stormwater runoff. Other features include approximately 41,300 sf of hardscape improvements (i.e., sidewalks and pedestrian walkways). The Proposed Project would require water, fire water, and sewer connection points, as well as a new three-inch domestic water line. Sewer and wastewater collection services would be provided by the City of Brawley. Electrical services would be provided by the Imperial Irrigation District. New electrical connections would be required, and no natural gas usage is proposed.

Construction of the Proposed Project is anticipated to begin January 2024 and end in approximately August 2025. Once completed, the Proposed Project would serve and support the previously approved student enrollment; the Proposed Project does not include an increase, nor would it result in an increase, in student enrollment above prior approved levels. Four new faculty/staff members, in addition to existing campus faculty/staff, would support the new facility.

Project Location: The Proposed Project would be located on SDSU's Off-Campus Center - Brawley, which is located at 560 California State Route 78 in Imperial County, east of the city of Brawley (see Figure 1, Regional/Campus Location).

Initial Study: An Initial Study has been prepared in accordance with the CEQA (Cal. Public Resources Code, section 2100 et seq.), to ascertain whether the Proposed Project may have a significant effect on the environment. A copy of the Initial Study is attached to this Mitigated Negative Declaration and is incorporated herein by this reference.

The Initial Study determined that construction and operation of the Proposed Project would result in potentially significant impacts related to Biological Resources, Cultural Resources, Geology and Soils, and Tribal Cultural Resources. However, the Initial Study identifies mitigation measures, listed below, which, in combination with applicable previously adopted mitigation measures, would reduce all identified potentially significant impacts to a less than significant level. The Initial Study further determined the Proposed Project would result in less than significant impacts to the following environmental impact categories: Aesthetics, Agriculture and Forestry Resources, Air Quality, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire.

Mitigation Measures: In addition to those applicable mitigation measures previously adopted as part of the Program EIR, the following mitigation measures would be required in conjunction with Project implementation:

BIO-1: If ground disturbance and/or vegetation clearance activities are scheduled to occur during the avian nesting season (February 15th to August 30th), SDSU, or its designee, shall retain a biologist to conduct a pre-construction nesting bird survey within the area to be disturbed and a 500-foot-buffer. Surveys should be conducted within 3 days prior to initiation of activity between dawn and noon.

If construction begins outside the nesting bird season (i.e., between August 31st and February 14th), work may proceed without a nesting bird survey. If construction begins outside the nesting season, but crosses into the nesting season (i.e., starts in January but work continues until March), construction activities may proceed without a nesting bird survey. However, anytime construction must pause for more than 72-hours during the nesting season, an updated nesting bird survey should be conducted prior to the resumption of construction activities.

If an active nest is detected during the nesting bird survey, avoidance buffers shall be implemented as determined by a biologist retained by SDSU. The buffer should be of sufficient distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the biologist until nestlings have fledged and dispersed, or it is confirmed that the nest has been unsuccessful or abandoned.

BIO-2: Prior to the initiation of construction activities, SDSU, or its designee, shall retain a biologist to conduct a pre-construction survey for burrowing owl to determine the presence/absence of the species. SDSU shall submit at least one burrowing owl pre-construction survey report to CDFW to document compliance with this mitigation measure. For the purposes of this mitigation measure, “qualified biologist” is a biologist who meets the requirements set forth in the California Department of Fish & Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation (CDFW 2012).

The survey shall be conducted within 30 days of site disturbance in accordance with the most current and applicable CDFW protocol. If burrowing owls are not detected during the survey, no additional surveys or mitigation is required. Preconstruction surveys shall observe suitable burrowing owl habitat within the Project footprint and within 500 feet of the Project footprint (or within an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists).

Nesting Season Observation

If burrowing owl is located during the survey, occupied burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg laying and incubation, or that juveniles from the occupied burrows are foraging independently and capable of independent survival. If occupied burrows are present during the nesting season, construction activities may commence, or resume as applicable, after non-disturbance buffers are implemented by a biologist in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). If burrows are present, the biologist shall be contracted to perform monitoring during all construction activities approximately every other day. However, the definitive frequency and duration of monitoring shall be dependent on whether it is the breeding versus non-breeding season and the efficacy of the disturbance buffers, as determined by the biologist and in coordination with CDFW.

Non-Breeding/Non-Nesting Observation

If burrowing owl is detected during the non-breeding/non-nesting season (September 1 through January 31) or if confirmed to not be nesting, a non-disturbance buffer between the project activities and the occupied burrow shall be installed by a qualified biologist in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). However, under these circumstances, monitoring by the biologist is not required.

Avoidance Not Possible Through Non-Disturbance Buffers

If avoidance is not possible through the installation of non-disturbance buffers, SDSU, or its designee, shall prepare a Burrowing Owl Relocation and Mitigation Plan for submittal and approval by CDFW. Once approved, the Plan shall be implemented to relocate burrowing owls from the Project site.

BIO-3: SDSU, or its designee, shall implement the following measures during project construction activities to avoid indirect impacts to aquatic resources:

- Construction limits should be clearly flagged so that adjacent native vegetation is avoided.
- Construction work and operations and maintenance areas should be kept clean of debris, such as trash and construction materials. Fully covered trash receptacles that are animal-proof should be installed and used during construction to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Trash contained within the receptacles should be removed from the work area at least once a week.
- Staging and storage areas for spoils, equipment, materials, fuels, lubricants, and solvents should be located within the designated impact area or adjacent developed areas.
- Best management practices should be implemented to ensure water quality in existing drainages would not be affected during project activities.

CUL-1: If CSU/SDSU, or its designee, discovers, through the building contractor, any artifacts during excavation and/or construction of the Brawley Sciences building, CSU/SDSU shall direct the contractor to stop all affected work and call in a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards to assess the discovery and, if necessary, suggest further mitigation.

If CSU/SDSU, or its designee, discovers, through the Contractor, human remains during construction of the Brawley Sciences building, CSU/SDSU, or its designee, shall contact the county coroner and a qualified archaeologist. If the remains are determined to be Native American, CSU/SDSU shall contact the appropriate tribal representatives to oversee removal of the remains. If any buried cultural deposits are discovered during construction, development should be suspended or directed to another location and the discovery protected and evaluated for its potential eligibility for listing on the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR). Construction activities may continue in other areas but should be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA or eligible for listing on the NRHP or the CRHR and avoidance is not feasible, additional work such as data recovery may be warranted. Following evaluation by a qualified archaeologist and in consultation with CSU/SDSU, construction shall be permitted to resume.

CUL-2: Although the potential for discovery of tribal cultural resources on the project site is considered low, in response to requests made during AB 52 consultation meetings, CSU/SDSU shall authorize tribal monitoring of such resources during project construction grading activities and shall provide appropriate remuneration for such monitoring consistent with standard practices. SDSU retains the authority to select

the monitor, which shall be provided by either the Sycuan Band of the Kumeyaay Nation or the San Pasqual Band of Mission Indians. Such monitoring by a single tribal monitor shall be authorized on a daily basis during project construction grading activities; however, in the event a monitor is not available on any given day, project construction activities may continue uninterrupted. In the event tribal cultural resources are inadvertently encountered during project construction activities, work in the immediate area must stop and a qualified archaeologist meeting the Secretary of the Interior's Professional Standards shall assess the discovery in consultation with the Sycuan Band of the Kumeyaay Nation and the San Pasqual Band of Mission Indians to evaluate the resource and develop a plan for treatment and disposition of the resource. If avoidance is not feasible, additional work such as data recovery may be warranted. Following evaluation by a qualified archaeologist, in consultation with the Sycuan Band of the Kumeyaay Nation, the San Pasqual Band of Mission Indians, and CSU/SDSU, construction shall be permitted to resume.

GEO-1: Prior to commencement of any grading activity on site, SDSU or its designee shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) 2010 guidelines to prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP 2010 guidelines and outline requirements for: preconstruction meeting attendance and worker environmental awareness training; where paleontological monitoring is required within the project site based on construction plans and/or geotechnical reports; and, procedures for adequate paleontological monitoring and discoveries treatment, including paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. The PRIMP shall also include a statement that any fossil lab or curation costs (if necessary due to fossil recovery) are the responsibility of SDSU or its designee.

In addition, a qualified paleontological monitor shall be on site during initial rough grading and other significant ground-disturbing activities (including augering) in areas underlain by Lake Cahuilla sediments. No paleontological monitoring is necessary during ground disturbance within artificial fill, if determined to be present. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will allow grading to recommence in the area of the find.

Proposed Finding: On the basis of the whole record, there is no substantial evidence showing the Proposed Project will have a significant effect on the environment.

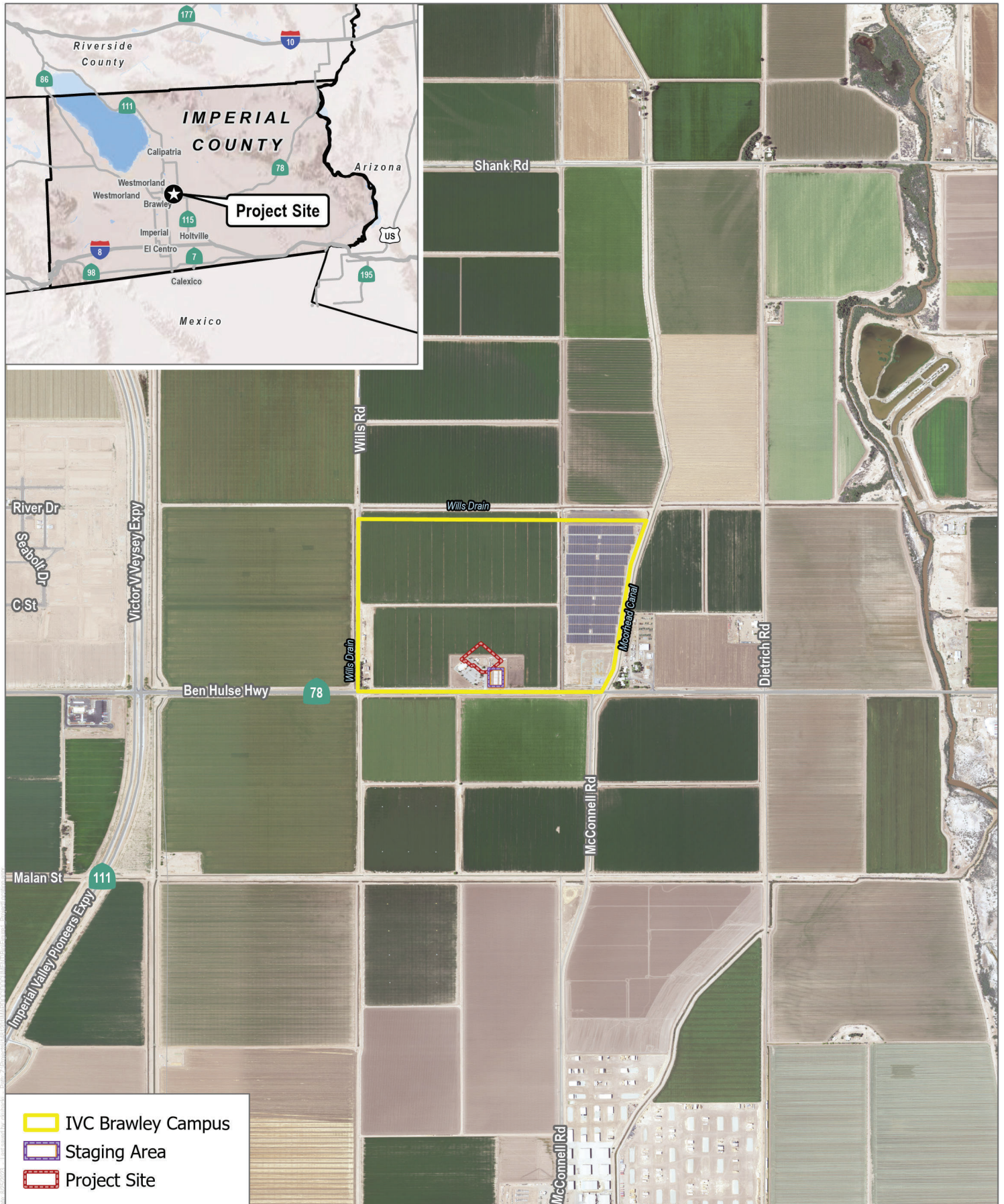


FIGURE 1

Regional/Campus Location

SDSU Brawley Sciences Building Project

Draft Initial Study

**California State University
San Diego State University
Imperial Valley Off-Campus Center - Brawley
Brawley Sciences Building
Project**

AUGUST 2023

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AFY	acre-feet per year
ALUCP	Airport Land Use Compatibility Plan
ASF	assignable square feet
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CGS	California Geological Survey
CO	carbon monoxide
CO ₂	carbon dioxide
CRHR	California Register of Historical Resources
CSU	California State University
CY	cubic yard
dB	decibel
dBA	A-weighted decibels
DPM	diesel particulate matter
DSA	Division of the State Architect
EIR	environmental impact report
ESA	Environmental Site Assessment
FTE	full-time equivalent
GSF	gross square feet
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
IS	Initial Study
IVC	Imperial Valley Campus
L _{eq}	energy equivalent level
MOU	Memorandum of Understanding
MS4	municipal separate storm sewer system
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System

Acronym/Abbreviation	Definition
NRHP	National Register of Historic Places
O ₃	ozone
PM _{2.5}	fine particulate matter
PM ₁₀	coarse particulate matter
PV	photovoltaic
ROG	reactive organic gas
SB	Senate Bill
SCAG	Southern California Association of Governments
SCIC	South Coastal Information Center
SDSU	San Diego State University
SF	square feet
SOI	sphere of influence
SR	State Route
SSAB	Salton Sea Air Basin
STEM	science, technology, engineering, and mathematics
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminant
UPD	University Police Department
VMT	vehicle miles traveled

1 Introduction

San Diego State University (SDSU) is proposing construction and operation of the SDSU Imperial Valley, Off-Campus Center – Brawley (Brawley Center), Brawley Sciences Building Project (project or proposed project). The proposed project includes construction and operation of a new 36,900 gross square foot (sf) building that would house lower and upper division teaching labs, research and research services space, experimental fabrication space for collaborative work with future public and private partners, faculty/administrative offices, conference rooms, and mechanical, electrical, and telecommunications support spaces. The proposed project also would include approximately 60,000 sf of landscaping and 40,000 sf of hardscape improvements.

In September 2003, the Board of Trustees of the California State University (CSU Board of Trustees) certified an environmental impact report (EIR; SCH No. 2002051010) and approved the Master Plan for the development of the Brawley Center, an expansion of SDSU's educational offerings in Imperial County, which also includes the Imperial Valley Off-Campus Center – Calexico, approximately 24 miles away. The approved Campus Master Plan and certified EIR provide sufficient environmental analysis and the authorization necessary for projected enrollment of 850 full-time equivalent (FTE) students and associated faculty and staff and a framework for development of academic, sports/athletic, student services, and administrative facilities necessary to serve the approved/projected Brawley Center enrollment.¹ The proposed project is consistent with the previously approved Master Plan; no changes in the previously approved land uses or previously authorized enrollment projection of 850 FTE students would occur.

1.1 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a “project” as defined by CEQA (California Public Resources Code, Section 21000 et seq.) and Title 14 of the California Code of Regulations, Section 15000 et seq. (hereafter, “CEQA Guidelines”). To facilitate compliance with CEQA's requirements, an initial study (IS) has been prepared to analyze the potential environmental effects associated with the proposed project.

Section 15168(c) of the CEQA Guidelines provides that following preparation of a program EIR such as the 2003 EIR in this case, later activities within the program (i.e., later activities within the previously approved Master Plan) are to be examined in light of the program EIR to determine whether additional environmental review is required. If the later activity would have effects not examined in the program EIR, a new IS is to be prepared leading to preparation of an EIR or negative declaration. The IS may tier from the program EIR as provided in CEQA Guidelines Section 15152.

The IS presented here analyzes the potential project-specific environmental effects associated with development and operation of the proposed project, which is within the scope of the Brawley Center Master Plan covered by the 2003 EIR. The IS identifies several potentially significant effects (biological, cultural/tribal, and paleontological),

¹ AN FTE student is one university student taking 15 course credits. Three part-time students each taking 5 credits would be considered one FTE student. Current/Fall 2022 enrollment at SDSU Brawley is approximately 45 FTE students (S.Hyman, SDSU, September 2022). SDSU forecasts that with development of the Brawley Sciences building, FTE-equivalent enrollment at the Brawley off-campus center will increase over current enrollment by approximately 95 FTE to approximately 140 FTE, well below the previously approved enrollment of 850 FTE students (AC Martin, SDSU, August 2023).

although proposals made by the applicant in the form of enforceable mitigation measures, in combination with applicable mitigation measures previously adopted as part of the program EIR, would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur. As such, preparation of this mitigated negative declaration, which tiers from the previously certified program EIR, is appropriate under the circumstances (CEQA Guidelines Section 15070[b]).

1.2 Document Organization

This document is organized as follows:

Chapter 1: Introduction. This chapter provides an introduction to the environmental review process. It describes the purpose and organization of this document and presents a summary of findings.

Chapter 2: Project Description. This chapter describes an overview and background of the proposed project as well as a detailed description of the project.

Chapter 3: Initial Study Checklist. This chapter presents an analysis of environmental issues identified in the CEQA Environmental Checklist and determines if proposed project actions would result in no impact, a less-than-significant impact, or a less-than-significant impact with incorporation of mitigation measures.

Chapter 4: References and Preparers. This chapter lists the references used in preparation of this IS/MND and identifies report preparers.

Appendices A–K. The analysis presented in Section 3.0, Initial Study Checklist, is based primarily on technical reports prepared by Dudek. These technical reports and other documents used during preparation of this IS/MND are provided as appendices to this Initial Study. The appendices are contained in a PDF file separate from this Initial Study. Slipsheet references to each appendix are provided at the end of this Initial Study.

2 Project Description

2.1 Introduction

The purpose of this chapter is to describe the proposed project for the public, reviewing agencies, and decision makers. Pursuant to CEQA, Public Resources Code Section 21000 et seq., and CEQA Guidelines Section 15124, an adequate project description is to contain the following information:

1. The precise location and boundaries of the proposed project, shown on a detailed map, along with a regional map of the project location;
2. A statement of the objectives of the proposed project, which should include the underlying purpose of the project;
3. A general description of the project's technical, economic, and environmental characteristics; and
4. A statement briefly describing the intended uses of the environmental impact report (EIR).²

An adequate project description should not supply extensive detail beyond the information necessary to evaluate and review the proposed project's environmental effects (CEQA Guidelines Section 15124). This chapter describes the proposed project, including its location, objectives, and characteristics, and the intended uses of this environmental document. As previously described, the Board of Trustees of the CSU, which is the State of California acting in its higher education capacity, is the lead agency on behalf of SDSU responsible for certifying the adequacy and completeness of this document and considering approval of the proposed project.

2.2 Project Overview and Background

In September 2003, CSU certified an EIR and approved a Master Plan for development of the SDSU Off-Campus Brawley Center, to expand SDSU's educational offerings in Imperial County, which also include the Imperial Valley Off-Campus Center – Calexico, approximately 24 miles away. The two Imperial Valley off-campus centers supplement SDSU's main campus in San Diego and further the university's regional educational mission to provide additional educational opportunities to outlying communities in Imperial County. The approved Brawley Center Master Plan and certified EIR provide sufficient environmental analysis and CSU authorization necessary for the projected enrollment of 850 FTE students and associated faculty and staff and a framework for development of the facilities necessary to serve this projected enrollment and campus population.

The Brawley Center is approximately 200 acres in size and is located east of the City of Brawley (City). Currently, the Brawley Center has been partially built out with educational and support facilities, although much of it remains undeveloped or used for active agriculture. As noted above, the environmental impacts associated with development of Brawley Center, including the projected student enrollment of up to 850 FTE, were evaluated at a program level of review in the previously certified 2003 SDSU Imperial Valley Campus Master Plan Project EIR (2003 EIR; SDSU 2003) (SCH 2002051010). Consistent with the previously approved Master Plan, SDSU now proposes construction and operation of a research and instruction facility that would be located at Brawley Center.

² While it has been determined that preparation of an EIR is not necessary in this case, the CEQA Guidelines relative to preparation of an EIR provide appropriate instruction as to the content of a CEQA document project description, whether a negative declaration, mitigated negative declaration, or EIR ultimately is prepared.

SDSU 2003 Imperial Valley Brawley Center Master Plan

As noted, the Brawley Center Master Plan establishes a development framework and associated goals in response to growing demands for educational facilities within the Imperial Valley. Specifically, the approved 2003 Master Plan provides for the projected enrollment of 850 FTE students/faculty/staff and development of 12 buildings, four parking lots, sports/athletic amenities, and internal circulation infrastructure (i.e., pedestrian pathways, roads) within the 200-acre campus. The 2003 Master Plan also identifies areas for future academic, research and development, housing, agriculture, and other campus uses (e.g., gardens, energy farm, community uses).

2.3 Project Location and Existing Conditions

Brawley Center is located at 560 California State Route (SR) 78 (also referred to as Ben Hulse Highway) in Imperial County, east of the City of Brawley (see Figure 1, Regional/Brawley Center Location). Regional access to the Brawley Center is provided by SR 111 and SR 86 to the west and northwest, respectively, and SR 115 to the east. The center is bound to the north and east by agricultural and undeveloped land, to the south by SR 78, and to the west by agricultural support uses. Wills Road bounds the western edge of the agricultural land that is immediately west of the center. The Moorhead Canal bounds the center to the east. The center currently consists of one academic building (Building 101) and a parking lot and is accessible by vehicle via SR 78.

The proposed sciences building would be constructed northeast of existing Building 101 and the associated parking lot, generally on the site of previously approved Brawley Center Master Plan Building 102 (see Figure 2, SDSU Brawley Center Project Site, Sciences Building and Staging Area Locations). The current Master Plan and related Legend are provided on Figure 3, and the proposed Master Plan illustrating the revised location of Building 102 is provided on Figure 4. Project construction staging areas would occupy the area of Brawley Center located southeast of the site and north of SR 78. Undeveloped land and a solar farm are located directly east of the proposed project site.

As an entity of the State of California, CSU is not subject to local government planning and land use plans, policies, or regulations. However, in the interest of transparency and coordination, CSU/SDSU may consider the local plans and policies of those areas which surround campus locations, as appropriate. Accordingly, for information purposes, Imperial County's current designation for the Brawley Center site, which is geographically located in the unincorporated county, is Government/Special Public land use and zoned as Government/Special Public Zone (G/S) (Imperial County 2023a, 2023b). The Brawley Center is also located on land designated as, and surrounded by, Farmland of Statewide Importance per the California Department of Conservation Farmland Mapping and Monitoring Program.

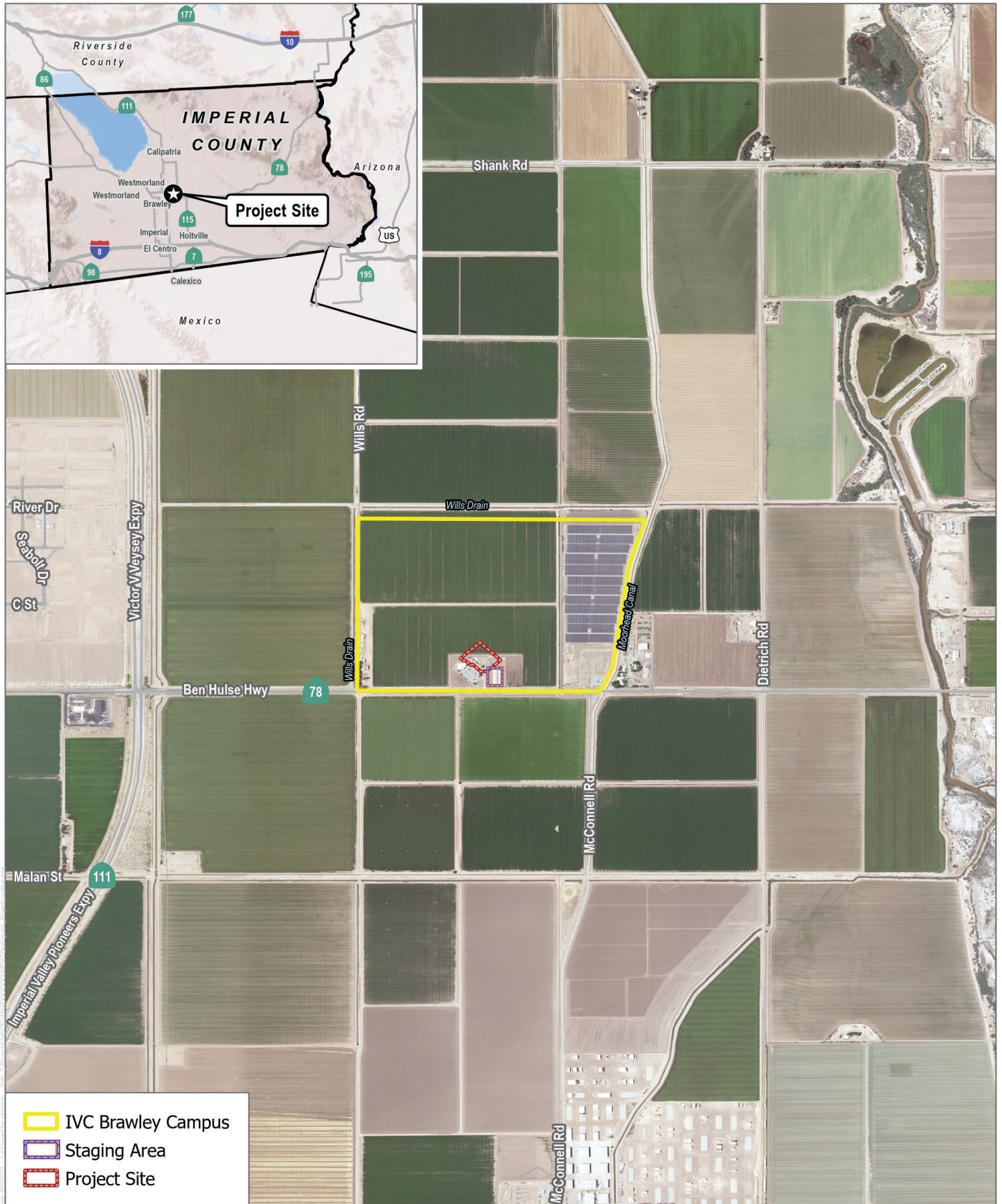
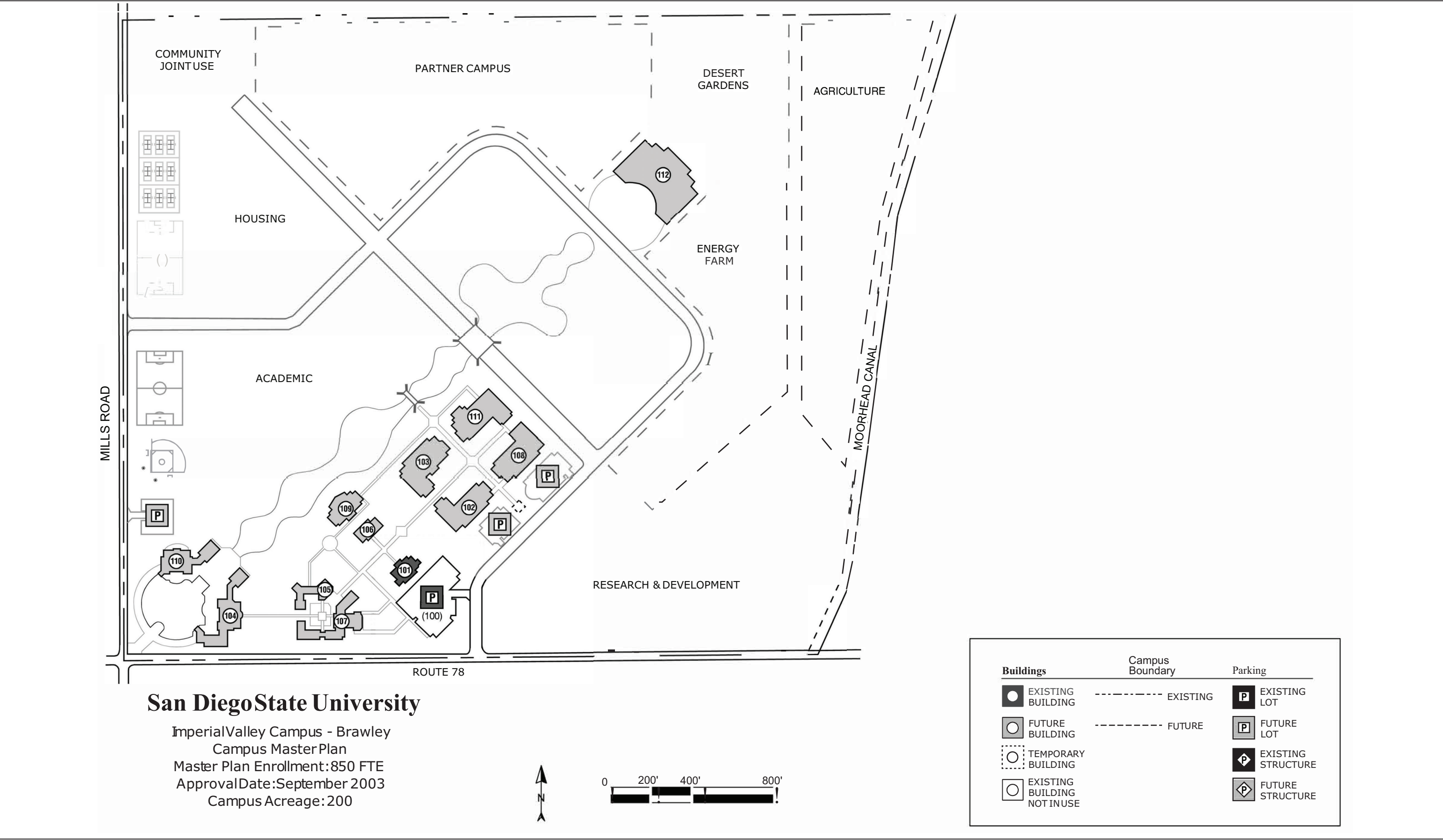


FIGURE 1

Regional/Campus Location

SDSU Brawley Sciences Building Project



SOURCE: SDSU 2023

FIGURE 3A
Existing Brawley Center Master Plan Map

Main Campus Master Plan Enrollment: 35,000 FTE

Main Campus Master Plan Approved by the Board of Trustees: May 1963

Main Campus Master Plan Revision approved by the Board of Trustees: June 1967, July 1971, November 1973, July 1975, May 1977, November 1977, September 1978, September 1981, May 1982, July 1983, May 1984, July 1985, January 1987, July 1988, July 1989, May 1990, September 1998, May 1999, March 2001, May 2011, May 2017, May 2018

1. Art - South	90. Arts and Letters	IMPERIAL VALLEY Off-Campus Center,
2. Hepner Hall	90a. Parking 14	Imperial Valley Campus - Brawley
3. Geology - Mathematics - Computer Science	91. Tenochca Hall (Coed. Residence)	Master Plan Enrollment: 850 FTE
3a. Geology - Mathematics - Computer Science	91b. Tenochca Community Space	Master Plan approved by the Board of Trustees:
4. Addition	91c. Tula Community Center	September 2003
6. Education	92. Art Gallery	101. Initial Building (Brandt Building)
8. Storm Hall	93. Chapultepec Hall (Coed. Residence)	102. Academic Building II
8a. Storm Hall West	94. Tepeyac (Coed. Residence)	103. Academic Building III
8b. Charles Hostler Hall	95. Tacuba (Coed. Residence)	104. Library
10. Life Science - South	96. Parking 3	105. Computer Building
11. Little Theatre	97. Rehabilitation Center	106. Auditorium
12. Communication	98. Logistical Services	107. Administration
13. Physics	99. Parking 4	108. Academic Building IV
14. Physics - Astronomy	100. Villa Alvarado Hall (Coed. Residence)	109. Student Center
15. University Police	101. Maintenance Garage	110. Energy Museum
16. Peterson Gymnasium	101a. Building A	111. Faculty Office
17. Physical Sciences	102. Cogeneration/Chill Plant	112. Agricultural Research
18. Nasatir Hall	103. Recreation Field	
18a. Aztec Shops Terrace	104. Academic Building A	IMPERIAL VALLEY Off-Campus Center,
19. Engineering	105. Academic Building B	Imperial Valley Campus - Calexico
20. Exercise and Nutritional Sciences Annex	106. Academic Building C - Education	Master Plan Enrollment: 850 FTE
21. Exercise and Nutritional Sciences	107. College of Business	Master Plan approved by the Board of Trustees:
23. Facilities Services Boiler Shop	109. University Children's Center	February 1980
24. Facilities Services	110. Growth Chamber	Master Plan Revision approved by the Board
25. Cogeneration Plant	111. Prebys Stage	of Trustees: September 2003
26. Hardy Memorial Tower	111a. Amenities Building	1. North Classroom Building
27. Professional Studies and Fine Arts	112. Resource Conservation	2. Administration Building
28. Atkinson Hall	113. Waste Facility	2a. Art Gallery
29. Student Services - West	114. Engineering and Interdisciplinary Sciences	3. Auditorium / Classrooms
30. Administration	115. Physical Plant/Corporation Yard	4. Classroom Building
31. Calpulli (Counseling, Disabled and	116. School of Communication Addition A	5. Library
Student Health Services)	117. School of Communication Addition B	5a. Library Addition
32. Charles B. Bell Jr. Pavilion	118. School of Communication Addition C	6. Physical Plant
33. Cuicacalli (Dining)	119. Life Science North Replacement	7. Computer Building
34. Ellen Ochoa Pavilion	135. Donald P. Shiley BioScience Center	9. Faculty Offices Building East
35. Life Science - North	140. Special Events Operations Center	10. Faculty Offices Building West
36. Dramatic Arts	161. Alvarado Park - Academic Building 1	20. Student Center
37. Lamden Hall	162. Alvarado Park - Academic Building 2	21. Classroom Building/Classroom Building East
38. North Education	163. Alvarado Park - Academic Building 3	22. Classroom Building South
38a. North Education 60	164. Alvarado Park - Academic Building 4	201. Classroom Buildings (3 temporaries)
39. Faculty/Staff Club	166. Villa Alvarado Expansion	
41. Scripps Cottage	167. Huaxyacac Residence Hall	MISSION VALLEY Site
42. Speech, Language and Hearing Sciences	170. Alvarado Park - Parking Structure	Master Plan Enrollment: 15,000 FTE
44. Facilities Services Chill Plant	171. Alvarado Park - Research Building 1	Master Plan approved by the Board of Trustees:
45. Aztec Shops Bookstore	172. Alvarado Park - Research Building 2	January 2020
46. Maya Hall	173. Alvarado Park - Research Building 3	500. Snapdragon Stadium
47. Olmeca Hall (Coed. Residence)	180. Adobe Falls Lower Village	501. Campus Office/Research and Innovation
51. Zura Hall (Coed. Residence)	181. Adobe Falls Upper Village	502. Campus Office/Research and Innovation
52. Conrad Prebys Aztec Student Union	182. South Campus Plaza Parking Building 3	503. Campus Office/Research and Innovation
53. Music	183. South Campus Plaza Building 1	504. Campus Office/Research and Innovation
54. Love Library	184. South Campus Plaza Building 2	505. Campus Office/Research and Innovation
55. Parking 1	185. South Campus Plaza Building 5	506. Campus Office/Research and Innovation
56. Art - North	186. South Campus Plaza Building 4	507. Campus Office/Research and Innovation
58. Adams Humanities	187. South Campus Plaza Building 6	508. Campus Office/Research and Innovation
59. Student Services - East	188. South Campus Plaza Building 7	509. Campus Office/Research and
60. Chemical Sciences Laboratory	240. Transit Center	Innovation/Retail
62. Student Housing, Phase I (600 beds)	306. Facilities Services Grounds Storage	510. Campus Office/Research and Innovation
63. Student Housing, Phase II (700 beds)	310. EHS Storage Shed	511. Campus Office/Research and Innovation
64. Student Housing, Phase II (700 beds)	311. Substation D	512. Campus Office/Research and
67. Fowler Athletics Center/Hall of Fame	312. Substation B	Innovation/Retail
69. Aztec Recreation Center	313. Substation A	513. Campus Office/Research and Innovation
69a. Arena Meeting Center	316. Stadium Annex (Facilities Services Storage #5)	514. Campus Office/Research and
70. Viejas Arena at Aztec Bowl	317. Landscape Services	Innovation/Retail
70a. Arena Ticket Office	318. Landscape Services Equipment	515. Campus Office/Research and
71. Open Air Theater	907. 6475 Alvarado Road	Innovation/Retail
71a. Open Air Theater Hospitality House	908. 6505 Alvarado Road	516. Campus Hospitality
71c. Open Air Theater Upper Restrooms	909. 6495 Alvarado Road	517. Campus Residential
71e. Open Air Theater Concessions	910. 6330 Alvarado Road	518. Campus Residential
71h. Open Air Theater Office	925. Granada Apartments	519. Campus Residential
72. The KPBS Conrad Prebys Media	932. University Towers	520. Campus Residential
Complex at Copley Center		521. Campus Residential
72a. Gateway Center		522. Campus Residential/Retail
72b. Extended Studies Center		523. Campus Residential
73. Racquetball Courts		524. Campus Residential
74. International Student Center		525. Campus Residential
74a. Global Education Office		526. Campus Residential
74b. Faculty International Engagement Office		527. Campus Residential/Retail
74t. SDSU Passport Office		528. Campus Residential
76. Love Library Addition/Manchester Hall		529. Campus Residential
77. Tony Gwynn Stadium		530. Campus Residential
79. Softball Stadium		531. Campus Residential/Retail
80. Parking 6		532. Campus Residential
80. Parking Structure 7/Sports Deck		533. Campus Residential
82. Parking 12		534. Campus Residential
86. Aztec Aquaplex		(Garage parking structures integral to
87. Aztec Tennis Center		Campus Residential buildings)
88. Parma Payne Goodall Alumni Center		
89. Jeff Jacobs JAM Center		

LEGEND: Existing Facility / Proposed Facility

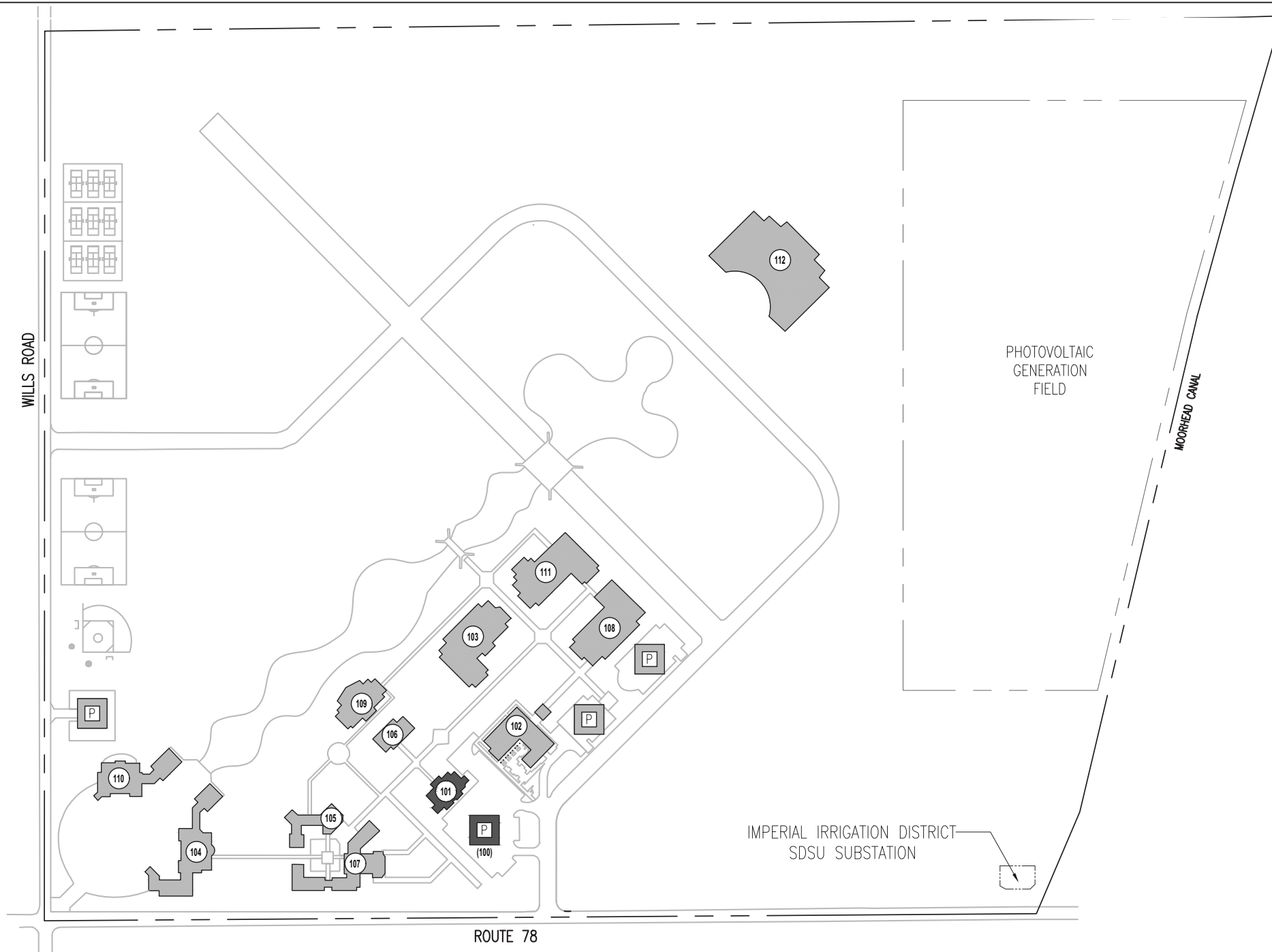
NOTE: Existing building numbers correspond with building numbers in the Space and Facilities Data Base (SFDB)

SOURCE: SDSU 2023

FIGURE 3B

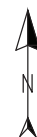
Brawley Center Master Plan Map Legend

SDSU Brawley Sciences Building Project



San Diego State University

Imperial Valley Campus - Brawley
 Campus Master Plan
 Master Plan Enrollment: 850 FTE
 Approval Date: September 2003
 Campus Acreage: 232



Buildings	Campus Boundary	Parking
EXISTING BUILDING	EXISTING	EXISTING LOT
FUTURE BUILDING	FUTURE	FUTURE LOT
TEMPORARY BUILDING		EXISTING STRUCTURE
EXISTING BUILDING NOT IN USE		FUTURE STRUCTURE

SOURCE: SDSU 2023

Main Campus Master Plan Enrollment: 35,000 FTE

Main Campus Master Plan Approved by the Board of Trustees: May 1963

Main Campus Master Plan Revision approved by the Board of Trustees: June 1967, July 1971, November 1973, July 1975, May 1977, November 1977, September 1978, September 1981, May 1982, July 1983, May 1984, July 1985, January 1987, July 1988, July 1989, May 1990, July 1990, September 1998, May 1999, March 2001, May 2011, May 2017, May 2018, February 2022, November 2022

1. Art - South	90. Arts and Letters	IMPERIAL VALLEY Off-Campus Center,
2. Hepner Hall	90a. Parking 14	Imperial Valley Campus - Brawley
3. Geology - Mathematics - Computer Science	91. Tenochca Hall (Coed. Residence)	Master Plan Enrollment: 850 FTE
3a. Geology - Mathematics - Computer Science	91b. Tenochca Community Space	Master Plan approved by the Board of Trustees:
6. Education	91c. Tula Community Center	September 2003
8. Storm Hall	92. Art Gallery	101. Initial Building (Brandt Building)
8a. Storm Hall West	93. Chapultepec Hall (Coed. Residence)	102. Brawley Sciences Building
8b. Charles Hostler Hall	94. Tepeyac (Coed. Residence)	103. Academic Building III
10. Life Science - South	95. Tacuba (Coed. Residence)	104. Library
11. Little Theatre	96. Parking 3	105. Computer Building
12. Communication	97. Rehabilitation Center	106. Auditorium
13. Physics	98. Logistical Services	107. Administration
14. Physics - Astronomy	99. Parking 4	108. Academic Building IV
15. University Police	100. Villa Alvarado Hall (Coed. Residence)	109. Student Center
16. Peterson Gymnasium	101. Maintenance Garage	110. Energy Museum
17. Physical Sciences	101a. Building A	111. Faculty Office
18. Nasatir Hall	102. Cogeneration/Chill Plant	112. Agricultural Research
18a. Aztec Shops Terrace	103. Recreation Field	
19. Engineering	104. Academic Building A	IMPERIAL VALLEY Off-Campus Center,
20. Exercise and Nutritional Sciences Annex	105. Academic Building B	Imperial Valley Campus - Calexico
21. Exercise and Nutritional Sciences	106. Academic Building C - Education	Master Plan Enrollment: 850 FTE
23. Facilities Services Boiler Shop	107. College of Business	Master Plan approved by the Board of Trustees:
24. Facilities Services	109. University Children's Center	February 1980
25. Cogeneration Plant	110. Growth Chamber	Master Plan Revision approved by the Board
26. Hardy Memorial Tower	111. Prebys Stage	of Trustees: September 2003
27. Professional Studies and Fine Arts	111a. Amenities Building	1. North Classroom Building
28. Atkinson Hall	112. Resource Conservation	2. Administration Building
29. Student Services - West	113. Waste Facility	2a. Art Gallery
30. Administration	114. Engineering and Interdisciplinary Sciences	3. Auditorium / Classrooms
31. Calpulli (Counseling, Disabled and	115. Physical Plant/Corporation Yard	4. Classroom Building
Student Health Services)	116. School of Communication Addition A	5. Library
32. Charles B. Bell Jr. Pavilion	117. School of Communication Addition B	5a. Library Addition
33. Cuicacalli (Dining)	118. School of Communication Addition C	6. Physical Plant
34. Ellen Ochoa Pavilion	119. Life Science North Replacement	7. Computer Building
35. Life Science - North	135. Donald P. Shiley BioScience Center	9. Faculty Offices Building East
36. Dramatic Arts	140. Special Events Operations Center	10. Faculty Offices Building West
37. Larden Hall	161. Alvarado Park - Academic Building 1	20. Student Center
38. North Education	162. Alvarado Park - Academic Building 2	21. Classroom Building/Classroom Building East
38a. North Education 60	163. Alvarado Park - Academic Building 3	22. Classroom Building South
39. Faculty/Staff Club	164. Alvarado Park - Academic Building 4	201. Classroom Buildings (3 temporaries)
41. Scripps Cottage	166. Villa Alvarado Expansion	
42. Speech, Language and Hearing Sciences	167. Huayyacac Residence Hall	MISSION VALLEY Site
44. Facilities Services Chill Plant	170. Alvarado Park - Parking Structure	Master Plan Enrollment: 15,000 FTE
45. Aztec Shops Bookstore	171. Alvarado Park - Research Building 1	Master Plan approved by the Board of Trustees:
46. Maya Hall	172. Alvarado Park - Research Building 2	January 2020
47. Olmeca Hall (Coed. Residence)	173. Alvarado Park - Research Building 3	500. Snapdragon Stadium
51. Zura Hall (Coed. Residence)	180. Adobe Falls Lower Village	501. Campus Office/Research and Innovation
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53. Music	182. South Campus Plaza Parking Building 3	503. Campus Office/Research and Innovation
54. Love Library	183. South Campus Plaza Building 1	504. Campus Office/Research and Innovation
55. Parking 1	184. South Campus Plaza Building 2	505. Campus Office/Research and Innovation
56. Art - North	185. South Campus Plaza Building 5	506. Campus Office/Research and Innovation
58. Adams Humanities	186. South Campus Plaza Building 4	507. Campus Office/Research and Innovation
59. Student Services - East	187. South Campus Plaza Building 6	508. Campus Office/Research and Innovation
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62. Student Housing, Phase I (600 beds)	240. Transit Center	Innovation/Retail
63. Student Housing, Phase II (700 beds)	306. Facilities Services Grounds Storage	510. Campus Office/Research and Innovation
64. Student Housing, Phase II (700 beds)	310. EHS Storage Shed	511. Campus Office/Research and Innovation
67. Fowler Athletics Center/Hall of Fame	311. Substation D	512. Campus Office/Research and
69. Aztec Recreation Center	312. Substation B	Innovation/Retail
69a. Arena Meeting Center	313. Substation A	513. Campus Office/Research and Innovation
70. Viejas Arena at Aztec Bowl	314. (New) Substation A	514. Campus Office/Research and
70a. Arena Ticket Office	316. Stadium Annex (Facilities Services Storage #5)	Innovation/Retail
71. Open Air Theater	317. Landscape Services	515. Campus Office/Research and
71a. Open Air Theater Hospitality House	318. Landscape Services Equipment	Innovation/Retail
71c. Open Air Theater Upper Restrooms	907. 6475 Alvarado Road	516. Campus Hospitality
71e. Open Air Theater Concessions	908. 6505 Alvarado Road	517. Campus Residential
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72. The KPBS Conrad Prebys Media	910. 6330 Alvarado Road	519. Campus Residential
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72b. Extended Studies Center		522. Campus Residential/Retail
73. Racquetball Courts		523. Campus Residential
74. International Student Center		524. Campus Residential
74a. Global Education Office		525. Campus Residential
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78. Softball Stadium		530. Campus Residential
79. Parking 6		531. Campus Residential/Retail
80. Parking Structure 7/Sports Deck		532. Campus Residential
82. Parking 12		533. Campus Residential
86. Aztec Aquaplex		534. Campus Residential
87. Aztec Tennis Center		(Garage parking structures integral to
88. Parma Payne Goodall Alumni Center		Campus Residential buildings)
89. Jeff Jacobs JAM Center		

LEGEND: Existing Facility / Proposed Facility

NOTE: Existing building numbers correspond with building numbers in the Space and Facilities Data Base (SFDB)

SOURCE: SDSU 2023

FIGURE 4B

Proposed Revision to Brawley Center Master Plan Map Legend

2.4 Project Elements

The proposed project would support continued buildout of the Brawley Center while providing new research, instruction, and administrative space for faculty and students.

2.4.1 Brawley Sciences Building

The proposed project involves the construction and operation of a new 36,900 gross sf educational building that would be 35 feet in height. The facility would include 22,500 assignable sf (ASF) that would house lower and upper division teaching labs, research and research services space, experimental fabrication space for collaborative work with future public and private partners. The proposed project would serve and support the previously approved student enrollment; the proposed project does not include an increase, nor would it result in an increase, in student enrollment above prior approved levels. As summarized further below, the proposed project also would include approximately 100,000 sf of related landscape and hardscape improvements.

The proposed project site is approximately 1.5 acres in size and the construction staging areas would occupy approximately 1-1/4 acre sf in the area of Brawley Center located southeast of the site and north of SR 78.

Landscaping, Stormwater, and Other Site Improvements

The proposed project would include approximately 61,200 sf of on-site landscaping, including bio-retention areas to capture stormwater runoff from stormwater drainage systems that would be located throughout the project site. Hardscape improvements would include approximately 41,300 sf of sidewalks and pedestrian walkways that would connect the project site to existing buildings and parking lot.

Utilities and Public Services

The proposed project would require new points of connection to domestic water, fire water, and sewer lines from existing utility lines to serve the new building, as well as a new domestic water line.

Water

Potable water is provided to the project site by the City of Brawley Department of Public Works through an agreement with the Brawley Center. The building would require a new 3-inch domestic water line. New water infrastructure would connect to existing infrastructure in coordination with the City. The proposed project's water demand would be approximately 74,400 gallons of water per day (83.3 acre-feet per year [AFY]).

Wastewater

Sewer and wastewater collection services at the project site would be provided by the City. Based on forecast water demand, the proposed project's wastewater generation is estimated to be approximately 0.07 million gallons per day of wastewater.

Electrical and Natural Gas Service

Electrical services within the project area are provided by Imperial Irrigation District (IID). IID provides electric power to over 158,000 customers in the Imperial Valley in addition to areas of Riverside and San Diego counties (IID 2023). New utility connections and infrastructure would be required to support electrical services within the new building, which would be served by IID. Implementation of the project would include a diesel operated back-up generator as well as 54 kilowatts (kW) of on-site solar. Natural gas would be used for proposed laboratory functions.

Access, Circulation, and Parking

Access to the project site would be provided via SR 78 and parking would be available in the existing Brawley Center parking lot located north of SR 78. As part of project construction, new pedestrian access/walkways would be incorporated to connect the project site to existing uses, including the existing building (Building 101 in Figure 2) as well as the parking lot.

On-site circulation improvements would consist of additional paved pathway/pedestrian walkway features. As previously described, the project would include approximately 41,300 sf of new hardscaped area.

2.4.2 Design Standards and Energy Efficiency

In May 2014, the CSU Board of Trustees broadened the application of sustainable practices to all areas of the university by updating the systemwide Sustainability Policy, which applies sustainable principles across all areas of university operations, expanding beyond facilities operations and utility management. This expansion was both a reaction to and a catalyst for a changing sustainability landscape within the CSU and higher education in general. The 2014 Sustainability Policy seeks to integrate sustainability into all facets of the CSU, including academics, facilities operations, the built environment, and student life (CSU 2018). Relatedly, the state has also strengthened energy efficiency requirements in the California Green Building Standards Code (CALGreen; Title 24 of the California Code of Regulations).

In response, all CSU new construction, remodeling, renovation, and repair projects, including the proposed project, will be designed with consideration of optimum energy utilization, low lifecycle operating costs, and compliance with all applicable energy codes and regulations. Progress submittals during design are monitored for individual envelope, indoor lighting, and mechanical system performances. The CSU Mechanical Review Board, established in February 2004, considers proposed building designs for conformance with code and energy efficiency practices (CSU 2018/2019).

2.4.3 Construction Activities and Phasing

The proposed project is anticipated to be developed over approximately 19 months, with construction estimated to begin in January 2024 and end in August 2025. As a result, the project would be operational by 2025. Construction and equipment staging would require 1-1/4 acre sf of space within the Brawley Center, directly east of the existing building (Building 101) and parking lot.

The project would involve site preparation, grading, and excavation associated with project construction. Excavation depths are anticipated to be 2 to 5 feet. Waste (i.e., excavated gravel/soil) generated during project construction would be balanced within the site.

2.5 Intended Uses/Project Actions and Approvals

2.5.1 Intended Uses

This CEQA document analyzes the proposed project at a detailed, project level of review. The document examines all phases of development and operation of the proposed project. It will be used by the CSU Board of Trustees to evaluate the potential environmental impacts associated with implementation of the proposed project. Additionally, this document could be relied upon by responsible agencies, if any, with permitting or approval authority over any project-specific action to be implemented in connection with the project.

SDSU is an entity of the CSU System, which is an authorized institution of the State of California. As a state entity, the CSU System is not subject to local government planning and land use plans, policies, or regulations. In the interest of transparency and coordination, SDSU may consider local plans and policies for areas which surround campus locations, as appropriate.

2.5.2 Requested Project Approvals

The following approvals by the CSU Board of Trustees are required prior to implementation of the proposed project:

1. Certification of adequacy and completeness of the CEQA document;
2. Approval of minor amendment to 2003 Brawley Center Master Plan; and
3. Other approvals, if any, as necessary.

Development of the proposed project may require permits and/or approvals issued by public agencies other than the CSU Board of Trustees. The following is a non-exclusive list of other project permits or approvals that may be required by other agencies:

1. Division of the State Architect (accessibility compliance)
2. State Fire Marshal (approval of facility fire and life safety review)

2.5.3 Responsible Agencies

Under CEQA, responsible agencies are public agencies other than the lead agency that have discretionary approval authority over the proposed project. The agencies listed in Section 2.5.2, Requested Project Approvals, may determine they have discretionary approval authority over one or more aspects of the proposed project; therefore, those agencies are identified at this time as potential responsible agencies. Any such agencies with approval authority would rely on the CEQA document prepared and certified by the lead agency (here, CSU) when considering issuing a project permit or other approval for the proposed project.

Trustee agencies are state agencies having jurisdiction by law over natural resources affected by the proposed project that are held in trust for the people of the State of California. Based on on-site survey results, literature review, and database searches, several special status species have been documented within the region of the proposed project. In the event that such species would be affected by development of the proposed project, the California Department of Fish and Wildlife (CDFW) would be considered a trustee agency.

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3 Initial Study Checklist

1. Project title:

San Diego State University (SDSU) Imperial Valley Off-Campus Center – Brawley,
Brawley Sciences Building Project

2. Lead agency name and address:

The Board of Trustees of The California State University
401 Golden Shore
Long Beach, California 92009

3. Contact person and phone number:

Amanda Scheidlinger
Director of Construction, San Diego State University
619.594.3740

4. Project location:

The SDSU Brawley Center is located at 560 California State Route 78, Brawley, California 92227, east of the City of Brawley. The proposed project site is located northeast of existing Brawley Center Building 101 and the associated parking lot.

5. Project sponsor's name and address:

SDSU Facilities Management
Planning, Design and Construction
San Diego State University, Administration Building Room 130 (AD-130), 5500 Campanile Drive
San Diego, California 92182

6. General plan designation:

The project site is designated as Government/Special Public land use (Imperial County 2023a).

7. Zoning:

The project site is zoned as Government/Special Public Zone (G/S) (Imperial County 2023b).

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The proposed project involves the construction and operation of a research and instruction facility located at the existing Brawley Center. Construction and operation of the proposed approximately 36,900-gross-square-foot facility would provide new research, instruction, and administrative space for faculty and

students. The facility would include approximately 22,500 ASF of lower and upper division teaching labs, research and research services space, space for future public and private partners, faculty/administrative offices, conference rooms, and mechanical, electrical and telecommunications support spaces.

The proposed facility would not increase projected student enrollment above the previously approved 850 FTE students. In addition to the existing Brawley Center faculty/staff, four new faculty/staff members would support the new facility. Other features of the proposed project include on-site landscaping and hardscape improvements such as sidewalks and pedestrian walkways. Please refer to Chapter 2, Project Description, for additional information about the proposed project.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

Surrounding uses include agricultural land to the north, south, and west. Undeveloped land and a solar farm are located directly east of the project site. The Brawley Center is bounded by SR 78 to the south, Moorhead Canal to the east, and Wills Road bounds the western edge of the agricultural land located immediately west of the center. Regional access to the Brawley Center is provided by SR 111 and SR 86 to the west and northwest, respectively, and SR 115 to the east.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- Certification of adequacy and completeness of the CEQA document (CSU Board of Trustees)
- Approval of minor amendment to 2003 Brawley Center Master Plan (CSU Board of Trustees)
- Other approvals, if any, as necessary (CSU Board of Trustees)
- Accessibility compliance (Division of the State Architect)
- Approval of facility fire and life safety review (State Fire Marshal)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In response to CSU/SDSU correspondence provided pursuant to Public Resources Code section 21080.3.1, the Sycuan Band of the Kumeyaay Nation, and the San Pascual Band of Mission Indians, each responded to SDSU's notice of the proposed project and requested consultation with the university. In response, the university provided each entity with technical reports prepared by the environmental consultant Dudek analyzing the proposed project's potential impacts on tribal cultural resources. Consultation meetings were scheduled and subsequently re-scheduled at the request of each tribe, beginning the week of July 31, 2023.

On July 31, 2023, a meeting was held between representatives of the San Pasqual Band of Mission Indians and CSU/SDSU. During the meeting, SDSU representatives provided an overview of the proposed project and explained the findings of the cultural resources technical memo prepared by Dudek; relevant excerpts of the technical memo also were provided to the San Pasqual Band in advance of the meeting. The San Pasqual Band requested an opportunity to monitor construction activities during project-related ground-

disturbing activities associated with the current project and SDSU explained that the request could be accommodated based on a rotating schedule with other tribes that also requested to monitor the project.

On August 4, 2023, a meeting between representatives of the Sycuan Band of the Kumeyaay Indians and CSU/SDSU was held. As with the San Pasqual meeting, SDSU representatives provided an overview of the proposed project and explained the findings of the cultural resources technical memo prepared by Dudek; relevant excerpts of the technical memo also were provided to the Sycuan Band in advance of the meeting. The Sycuan Band requested a site visit, along with an opportunity to conduct tribal monitoring during project-related ground-disturbing activities. SDSU responded that the site visit would be arranged and tribal monitoring could be accommodated based on a rotating schedule with other tribes that also requested to monitor project construction. (For additional information regarding tribal cultural resources and related consultations, please see Section 3.5 and Appendix D of this Initial Study.)

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project have a substantial adverse effect on a scenic vista?*

The IS prepared as part of the 2003 Master Plan EIR determined that no impact would occur from development of the Master Plan with regard to potential adverse effects to scenic vistas.

The Imperial County General Plan does not identify “scenic vistas”; however, two overlooks – the Osborne Overlook and Juan de Bautista Anza Overlook – are identified in the General Plan and described as offering scenic views of the surrounding landscape (Imperial County 1993a, 1993b). The Osborne Overlook is located approximately 20 miles to the east of the project site in the Imperial Sand Dunes Recreation Area and due to the distance, the project site is not visible from Osborne Overlook Park. The Juan de Bautista Anza Overlook is in the southwestern corner of Imperial County and is approximately 30 miles from the project site. Similar to the Osborne Overlook, due to the distance, the Anza Overlook does not provide views to the project site. Views to distant mountain terrain in the northern and northeastern portions of Imperial County are visible as SR 78 motorists approach and pass the Brawley Center. However, available views are occasionally interrupted by landscaping (trees on private property including Brawley Center) and development (including the approximately 20-foot-high William and Susan Brandt Building at Brawley Center). While the construction and operation of the approximate 35-foot-high, approximately 37,000-square-foot sciences building (and proposed site landscape trees) would similarly interrupt available views to distant mountains, such views are available to SR 78 motorists throughout the County. In addition, the

sciences building would be set back approximately 400 feet from SR 78. This distance would reduce the apparent scale of the proposed building as viewed from SR 78 and would be viewed within the context of the existing building and parking lot landscaping. Because the view corridor across the project site has been altered by existing development and landscaping on the Brawley Center, interruption of views from SR 78 to distant mountains would be brief in the visual experience of motorists, and because similar distant views are available to state route motorists throughout Imperial County, the construction and operation of the project would not have a substantial adverse effect on a scenic vista. Therefore, impacts would be **less than significant**.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The IS prepared for the 2003 EIR determined that no impact would occur with regard to substantial damage to scenic resources within a state scenic highway.

The project site is located approximately 24 miles from the nearest State Scenic Highway (i.e., SR 78 from the San Diego/Imperial County border to SR 86). As a result, construction activities and operation of the project would not be visible from the nearest State Scenic Highway. In addition, the project site does not support trees, rock outcrops, historic buildings, or other potentially scenic resources, including scenic visual resources identified in the County General Plan Conservation and Open Space Element (i.e., deserts, sand dunes, mountains, and the Salton Sea). Therefore, **no impacts** to scenic resources within a state scenic highway would occur.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The 2003 EIR did not analyze potential impacts to the existing visual character or quality of public views of the site and its surroundings. A discussion regarding the proposed project's potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings is provided below.

As of July 1, 2021, the estimated population of the City of Brawley was 26,539 persons (U.S. Census Bureau 2023). The City of Brawley is not contiguous with any of the other incorporated cities in Imperial County and therefore, pursuant to Public Resource Code Section 21071, the City and project site are within a non-urbanized area.

Views of the project site and Brawley Center are primarily available to the public from nearby SR 78. Representative views to the project site from eastbound and westbound SR 78 are provided in Appendix A on Figure 6, Representative Public Views to Project Site. As shown in this figure, existing visual character reflects a primarily agricultural environment as evidenced by the presence of relatively flat, altered, and irrigated terrain. However, the existing Brawley Center (specifically, parking lot, site landscaping, and the approximately 20-foot-high, 11,000-square-foot William and Susan Brandt Building) also contribute to the local visual environment and add a developed element with verticality and mass to the existing landscape. As proposed, the sciences building would be situated near the existing parking lot and would encompass an area supporting covered picnic tables, an unimproved access road, adjacent earthen drain, and agricultural fields. The building

would also be situated approximately 90 feet to the northeast of the existing building. Public views toward the proposed building from SR 78 would be filtered (and partially screened) by intervening landscaping, a research agricultural project on the site of the proposed staging area, and the existing building. While the proposed sciences building bulk and scale would be larger than the existing building, apparent bulk and scale as perceived from SR 78 would be reduced due to the presence of intervening development, landscape, and the sciences building's 400-foot setback from SR 78. Further, the introduction of the sciences building would be softened by proposed landscaping and would include perimeter and common area landscaping consisting of shrubs, trees, decorative rock, and potentially, decomposed granite. Proposed landscaping would be consistent with existing development and blend the project into the existing setting. Lastly, the quality of transient public views of the site and surrounding area would not be substantially degraded by project implementation because development would progress in an orderly phased fashion and the sciences building would be viewed within the context of existing development and landscaping at the Brawley Center. Therefore, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Impacts would be **less than significant**.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The IS prepared for the Brawley Center Master Plan 2003 EIR determined that with implementation of lighting standards in compliance with relevant goals and policies of the Imperial County General Plan, the incorporation of artificial lighting mitigation measures, and the siting of recreational fields (and associated field lighting) away from planned residential housing areas, potential lighting and glare impacts would be less than significant. The referenced mitigation measure is found in Section 3.1, Land Use and Planning, of the 2003 EIR and it requires compliance with Title 24 of the California Code of Regulations (CALGreen), which includes requirements for indoor and outdoor lighting systems associated with new development (see SDSU 2003, Mitigation Monitoring and Reporting Program [MMRP], p. 11-1).

Construction of the project would occur over an approximately 19-month time frame. While a detailed lighting plan or schedule has not been prepared, lighting sources anticipated to be installed on the project site to support the sciences building would be similar to those installed at the existing Brawley Center. For example, sidewalk and walkway lighting consisting of low post or standard pole lighting is anticipated to be installed, as is wall-mounted ("wall pack") fixtures on the exterior of the future sciences building. Overhead lighting in common areas (i.e., pathways, near building entrance) may also be installed. Consistent with existing uses at the Brawley Center, new lighting sources would be of appropriate intensity for the intended use (e.g., safety, security, and/or general illumination for pedestrians), and would generally be hooded and directed downward to minimize potential for skyglow, glare, and/or light trespass to off-campus areas. In addition, all exterior lighting sources installed on the project site would be compliant with California Energy Code allowances for lighting power and lighting control requirements and with Title 24, Part 6, the CALGreen requirements related to light pollution reduction. For example, Title 24, Part 6, Section 130 outlines mandatory requirements for lighting systems and equipment for nonresidential occupancies. These include but are not limited to wattage requirements, lighting controls, and light shielding/glare requirements in accordance with American National Standards Institute/Illuminating Engineering Society (ANSI/IES) standards. Because lighting installed on the project site would be of a similar distribution and intensity of existing sources at the Brawley Center, and because lighting sources would be hooded, directed downward, and compliant with applicable standards (i.e., Title 24, ANSI/IES) for lighting control and light pollution reduction, the project would not create a new source of substantial light or glare which would adversely

affect day or nighttime views in the area. Impacts would be **less than significant**, and no additional mitigation is required.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

Impacts related to conversion of farmland were evaluated in Section 3.10, Agricultural Lands, of the 2003 EIR. The 2003 EIR determined that buildout of the Brawley Center Master Plan would result in the loss and

conversion of 226 acres of statewide “important farmland” through rezoning of the site to non-agricultural uses. In response, the CSU Board of Trustees adopted a mitigation measure acknowledging that SDSU had prepared a conceptual land use plan that incorporates components to minimize agricultural impacts and promotes buffers from the surrounding agricultural lands in the form of landscaped and recreational areas (see SDSU 2003, MMRP, p. 11-4). With implementation of the mitigation measure, impacts were determined to be less than significant.

The proposed project involves construction and operation of a sciences building generally within the footprint of previously approved Building 102, as identified in the approved Brawley Center Master Plan and previously analyzed in the 2003 EIR. According to the Department of Conservation Farmland Mapping and Monitoring Program, the project site, and the majority of the Brawley Center site, is located on land designated as Farmland of Statewide Importance. However, impacts to Farmland of Statewide Importance were accounted for in the 2003 EIR, and mitigation was provided to buffer the Brawley Center from surrounding agricultural operations. Impacts were determined to be less than significant.

Therefore, the project would not convert any additional land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that was not already accounted for in the 2003 EIR. As a result, impacts would be **less than significant** and no additional mitigation is required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The IS prepared for the 2003 EIR determined that no impact would occur with regard to potential conflicts with agricultural zoning or a Williamson Act contract.

Preliminarily, CSU, as a state agency, is not subject to local land use planning or regulations, such as zoning. For information purposes, the project site is located within Brawley Center, which is zoned as G/S (Imperial County 2023b). While agricultural products (growing, harvesting, and processing) is an allowable use under this zoning designation, the previously approved 2003 Brawley Center Master Plan provides the framework for university-related development, including the proposed building. Further, effective January 2011, Imperial County filed non-renewal of all Williamson Act contracts and is not a reporting jurisdiction for Williamson Act contracts (DOC 2022, 2023). Implementation of the project, which includes construction and operation of a new sciences building to support teaching/research labs, meeting spaces, and offices, would be consistent with allowable and permitted uses under the G/S zoning designation and, more pertinently, the approved Brawley Center Master Plan. Because the project would not conflict with existing zoning for agricultural uses and the project site is not identified under a Williamson Act contract, impacts would be **less than significant**.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

The 2003 EIR and IS did not specifically address zoning or rezoning of forest land, timberland, or Timberland Production zones. Therefore, a discussion regarding the proposed project’s potential to conflict with forest land and timberland zoning is provided below.

As previously noted, as a state agency, CSU is not subject to local land use planning or regulations, such as zoning. For information purposes, and as described above, the Brawley Center, including the project site, is zoned by Imperial County as G/S. This zone allows for all types of government owned and/or operated facilities, including maintenance facilities, offices, schools, as well as research and development (Imperial County 2020). The G/S zone does not include any forest land or timberland uses, nor is there any existing vegetation within the Brawley Center and project site that would be considered viable forest land or timberland uses. Moreover, the project site is not considered forest land within the meaning of California Public Resources Code Section 12220(g), nor timberland within the meaning of California Public Resources Code Section 4526, nor zoned Timberland Production within the meaning of Government Code Section 51104(g). As a result, the project would not conflict with existing forest land, timberland, or timberland production zones. This impact would be **less than significant**.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The 2003 EIR and IS did not specifically address the loss or conversion of forest land to non-forest use. Therefore, a discussion regarding the proposed project's potential to result in the loss or conversion of forest land is provided below.

As discussed in Section 3.2(c), the project site does not include any forest land, as defined, nor is there any existing vegetation within the site or surrounding area that would be considered forest land. Therefore, the proposed project would not result in the loss or conversion of forest land to non-forest uses and impacts would be **less than significant**.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Impacts related to conversion of farmland were evaluated in Section 3.10, Agricultural Lands, of the 2003 EIR, which determined that buildout of the Brawley Center Master Plan would result in the loss and conversion of 226 acres of statewide important farmland through rezoning of the site to non-agricultural uses. A mitigation measure was adopted that acknowledged SDSU preparation of a conceptual land use plan to minimize agricultural impacts by encouraging buffers around surrounding agricultural uses (see SDSU 2003, MMRP, p. 11-4). With implementation of the mitigation measure, impacts were determined to be less than significant. Therefore, impacts relative to the conversion of Farmland to non-agricultural use were previously analyzed in the 2003 EIR and no further analysis is required. Because conversion of forest land was not specifically addressed in the 2003 EIR or IS, a discussion regarding the proposed project's potential to convert forest land to non-forest uses is provide below.

Since adoption of the 2003 EIR, the Brawley Center has been rezoned and is currently designated and zoned for Government/Special Uses, which allows for all types of government owned and/or operated facilities, as discussed in Section 3.2(c). The project site is not designated for Farmland or forest land uses and no forestry activities occur within the project site or Brawley Center. As a result, the project, which includes construction and operation of new academic building, would not convert existing Farmland or forest land uses to non-forest uses. As a result, this impact would be **less than significant**, and no additional mitigation is required.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis prepared for the 2003 EIR determined that there would be no significant air quality impacts as a result of development of the Brawley Center Master Plan. The air quality assessment concluded that there would be no construction related impacts or project-related exceedances for any criteria air pollutants during operation. As such, no air quality related mitigation measures were required or identified in the 2003 EIR. A summary of the prior analysis is provided below along with the current project-specific analysis for each Appendix G significance criterion, as applicable.

Consistent with the 2003 EIR, the impact assessment herein includes analysis of construction-related air quality emissions related to off-road equipment use and material movement specific to construction of the proposed sciences building. As discussed previously, the project would not generate additional students beyond the projected 850 FTE contemplated in the 2003 EIR. Because the proposed project FTE enrollment would be consistent with the FTE parameter used in the 2003 EIR analysis, no further analysis of operational emissions impacts related to mobile sources is required.

a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

The proposed project site is located within the Salton Sea Air Basin (SSAB), which includes all of Imperial County and the central portion of Riverside County (Coachella Valley). Imperial County, where the project site is located, is within the jurisdictional boundaries of the Imperial County Air Pollution Control District (ICAPCD). The ICAPCD is responsible for developing and implementing the clean air plans for attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) in the SSAB, including the 2018 PM₁₀ State Implementation Plan and the 2017 State Implementation Plan for the 75 ppb 8-hour Ozone Standard.

The previous analysis prepared for the 2003 EIR found that the project would have less-than-significant impacts related to conflicting with implementation of the applicable air quality plan. Given that the proposed project is within the scope of the approved Brawley Center Master Plan and certified 2003 EIR, that determination remains applicable. However, because the ICAPCD has adopted additional air quality plans since certification of the 2003 EIR, a discussion of the proposed project's potential to conflict with applicable plans that post-date the certified 2003 EIR is provided below.

The most efficient approach to determining project consistency with applicable air quality plans is assessing whether the proposed development is consistent with the growth anticipated by the land use plans that were used for preparation of the air quality plans. The relevant land use plans for the proposed project include the 2003 Brawley Center Master Plan and the Imperial County General Plan.

Relatedly, ICAPCD's air quality attainment plans are based, in part, on regional population and employment (and thus vehicle miles traveled [VMT]) growth projections from the Southern California Association of Governments (SCAG), which is the designated Metropolitan Planning Organization for Imperial County. Thus, a project's conformance with SCAG's Metropolitan Transportation Plan/Sustainable Communities Strategy that was considered in the preparation of the air quality attainment plans would demonstrate that the project would not conflict with or obstruct implementation of plans.

Further, the Imperial County General Plan is the governing land use document for physical development within the county. Projects that propose development consistent with growth anticipated by the current General Plan are considered consistent with the air quality attainment plans. If a project proposes development that is less dense than anticipated within the current General Plan, the project would likewise be consistent with the attainment plans because emissions would be less than estimated within the current General Plan. If a project proposes development that is greater than that anticipated in the General Plan and SCAG's growth projections, the project could be in conflict with the attainment plans and might have a potentially significant impact on air quality because emissions could exceed those estimated for the existing land use plan (i.e., General Plan).

As discussed in Chapter 2, Project Description, student enrollment and corresponding faculty and staff resulting from the proposed project would remain within the approved maximum FTE enrollment analyzed in the previously certified EIR and approved 2003 Brawley Center Master Plan for development of the Brawley Center, which itself is included in the County's General Plan Land Use Element.³

Implementation of the proposed project would not result in development in excess of that anticipated in the approved Master Plan or population growth beyond that anticipated by SCAG. Therefore, given that the proposed project is consistent with the growth projections used to prepare the air quality management plans for the SSAB (2018 PM₁₀ and 2017 Ozone State Implementation Plans), the project would be consistent with these plans. Impacts related to the potential to conflict with or obstruct implementation of the applicable air quality plans would be **less than significant**.

³ Page 27 of the Land Use Element of the Imperial County General Plan summarizes schools within the County and includes reference to the San Diego State University–Imperial Valley Campus in Brawley (Imperial County 2015). The campus boundary (which encompasses the project site) is also included on the Imperial County Land Use Plan Map as a Community Facility (College) (Imperial County 2007).

b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Air pollution contributes to cumulative impacts. The nonattainment status of regional pollutants is a result of past and present development, and ICAPCD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

The air quality analysis prepared for the 2003 EIR found that there would be no significant construction-related air quality impacts and no project-related exceedances or excessive concentrations of any criteria air pollutants per either state or federal standards.

The construction emissions estimate in the 2003 EIR was based on "typical worst day construction activities associated with a school campus construction project similar to the proposed project." The certified 2003 EIR's "typical worst day" equipment-related emissions estimation parameters included use of forklifts, off-highway trucks, tracked loaders, tracked tractor/dozers, scrapers, and rollers. Total equipment hours (i.e., total pieces of equipment × total hours of daily operation per piece) for the "typical worst day" were approximately 68 equipment hours per day. Additionally, the total earthwork quantity used in the 2003 EIR analysis was 10,000 cubic yards (CY) of material over 30 days, or 866 tons per day. As discussed in the project-specific analysis below, the construction equipment and activity anticipated for implementation of the proposed project is within the impact analysis envelope of the certified 2003 EIR.

While the proposed project fits within the impact analysis envelope of the certified 2003 EIR for equipment use and grading, the prior EIR assessment did not estimate emissions associated with off-site worker or vendor trips. Given that emissions from these sources have the potential to result in air quality impacts with construction of the proposed project, an updated project-specific estimate of air quality emissions from proposed project construction is provided.

The operational emissions estimate in the 2003 EIR included emissions from motor vehicles associated with the projected FTE enrollment of 850 ultimately expected at the Brawley Center. The analysis found that trip generation associated with this increase in FTE would result in no exceedances of ICAPCD threshold levels for all criteria air pollutants. Given that the proposed project would not increase the previously approved maximum FTE enrollment, the proposed project is consistent with the 850 previously analyzed in the certified 2003 EIR, and the proposed project's impacts related to operational mobile emissions would remain consistent with the less than significant finding of the previous analysis. As such, the proposed project analysis presented herein will focus on operational emissions related to the building envelope and site footprint (e.g., energy, area sources).

The project-specific analysis for air quality impacts is discussed separately for construction and operation below.

Construction Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and reactive organic gas (ROG) off-gassing) and off-site sources (i.e., on-road vendor trucks, and worker vehicle trips). Construction

emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for particulate matter, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of ROGs, oxides of nitrogen (NO_x), carbon monoxide (CO), coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). Additionally, PM₁₀ and PM_{2.5} emissions would be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. The proposed project would be required to comply with ICAPCD Rule VIII to control dust emissions generated during any dust-generating activities. Standard construction measures that would be employed to reduce fugitive dust emissions include limiting visible emissions to no greater than 20% opacity through use of chemical stabilizers, dust suppressants, and/or watering. Based on the developed nature of the project site and surrounding areas, and given that on-site and off-site roads would be paved, the default percentage of paved road was adjusted to more accurately represent on-road travel during construction of the proposed project. To account for potential unpaved vehicle movement within the project site vicinity, it was conservatively estimated that 95% of all travel (i.e., worker and vendor trips) would be on paved roads, with 5% on unpaved roads.

The California Emissions Estimator Model (CalEEMod) Version 2022.1.1.18 was used to estimate emissions from construction of the proposed project. CalEEMod default construction parameters were used when detailed project-specific information was not available, including specific off-road equipment for each phase. The construction equipment needed to build out the proposed project is similar to that analyzed in the 2003 EIR analysis, and would include forklifts, tractors/loaders/backhoes, graders, and bulldozers. Maximum daily activity would require approximately 50 equipment hours per day, which is well within the scope of the 68 hours analyzed for the “typical worst day” in the 2003 EIR.

According to preliminary project detail, the material movement estimated for construction of the proposed project is 7,500 CY of cut to be balanced on site, which also is within the scope of the previously identified 10,000 CY analyzed in the 2003 EIR. Additional detail on project-specific construction parameters is included in Appendix B, Attachment B.

Table 1 presents the estimated maximum daily construction emissions generated during construction of the proposed project. Details of the emission calculations are provided in Appendix B, Attachment B.

Table 1. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds per day					
2024	1.71	16.21	16.25	0.02	26.22	3.43
2025	24.59	9.29	11.95	0.02	26.18	2.92
Maximum	24.59	16.21	16.25	0.02	26.22	3.43
<i>ICAPCD Threshold</i>	75	100	550	—	150	—
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; ICAPCD = Imperial County Air Pollution Control District.
See Appendix B, Attachment B for complete results.

As shown in Table 1, proposed project construction would not exceed ICAPCD's daily thresholds. Therefore, construction impacts associated with criteria air pollutant emissions would be **less than significant**.

Operational Emissions

Criteria air pollutant emissions from daily operation of the proposed project were estimated using CalEEMod Version 2022.1.1.18 using a combination of CalEEMod default parameters and project-specific information provided by the applicant, where available. Operational year 2026 was analyzed as it is anticipated to be the first full year of operation following completion of project construction. Criteria air pollutant emissions sources and associated information are discussed below. As discussed previously, mobile sources associated with the Brawley Center Master Plan's projected FTE enrollment level were previously analyzed in the certified 2003 EIR. Because the proposed project would not increase FTE enrollment beyond the approved Brawley Center Master Plan level, emissions from the proposed project's mobile trips would be consistent with the less than significant impact determination of the 2003 EIR and are not included in the operational analyses.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2022). Consumer product ROG emissions are estimated in CalEEMod based on the floor area of nonresidential buildings and on the default factor of pounds of ROG per building square foot per day.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. The emissions associated with landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of nonresidential building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days (CAPCOA 2022).

Energy

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site. Per the applicant and consistent with CSU's aim to minimize use of natural gas and transition to electric alternatives, no natural gas would be used on site. All space and water heating will be electrified.

The proposed project would include the installation of a propane tank for the dedicated purpose of supporting lab spaces and other instructional uses. Emissions from daily propane use were calculated in a spreadsheet model using emission factors from the EPA's Compilation of Air Pollutant Emission Factors

(AP-42), Section 1.5, Liquefied Petroleum Gas Combustion, and project-specific usage data points. Per the applicant, approximately 36 gallons of propane would be used per day.

Stationary

Per preliminary project details, operation of the project would include use of an emergency backup generator. Specifications (i.e., horsepower) for a 150-kW capacity emergency standby generator set were used, with maximum annual usage not to exceed 80 hours. Worst case daily operation of the generator was conservatively calculated to be 24 hours.

Table 2 presents the estimated maximum daily emissions generated during operation of the proposed project. Details of the emission calculations are provided in Attachment B.

Table 2. Estimated Maximum Daily Operations Criteria Air Pollutant Emissions

Source	ROGs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds per day					
Area	0.93	—	—	—	—	—
Energy	0.04	0.47	0.27	<0.01	0.02	0.01
Stationary	6.54	18.27	23.72	0.03	0.96	0.96
Total	7.50	18.74	23.99	0.03	0.98	0.97
<i>ICAPCD Threshold</i>	<i>137</i>	<i>137</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>550</i>
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; ICAPCD = Imperial County Air Pollution Control District. See Appendix B, Attachment B for complete results.

As shown in Table 2, the project would not exceed ICAPCD's significance thresholds during operations. Therefore, operational impacts associated with criteria air pollutant emissions would be less than significant.

In considering cumulative impacts from the proposed project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SSAB is designated as nonattainment for the CAAQS and NAAQS. If a project's emissions would exceed ICAPCD's significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SSAB. If a project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality. The basis for analyzing the proposed project's cumulatively considerable contribution is if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact) and consistency with ICAPCD air quality plans, which address cumulative emissions in the SSAB.

The SSAB has been designated as a federal and state nonattainment area for ozone (O₃) and PM₁₀. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SSAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction of the proposed project would generate ROG and NO_x emissions (which are precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. As indicated in Tables 1 and 2, project-generated

construction and operational emissions would not exceed ICAPCD's emission-based significance thresholds for any criteria air pollutant.

Cumulative localized impacts would potentially result if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the proposed project site are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would be speculative. However, future projects would be subject to CEQA and would require an air quality analysis and, where necessary, mitigation if the project would exceed ICAPCD's significance thresholds. Criteria air pollutant emissions associated with construction activity of future proposed projects also would be reduced through implementation of control measures required by ICAPCD. Cumulative PM₁₀ and PM_{2.5} emissions would be reduced because all future projects would be subject to ICAPCD Regulation VIII (Fugitive Dust Control Measures), which sets forth general and specific requirements for all construction sites in the ICAPCD.

Based on the previous considerations, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and cumulative impacts would be **less than significant**.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the California Air Resources Board (CARB), sensitive receptor locations may include hospitals, schools, and daycare centers (CARB 2023). The closest sensitive receptor (i.e., residential dwelling) is approximately 1,400 feet to the west of the project site.

The air quality analysis prepared for the 2003 EIR found that there would be "no significant impact" related to exposure of sensitive receptors to substantial pollutant concentrations. The analysis focused on the use of chemical toxics (i.e., pesticides) associated with adjacent/past agricultural activity and its impact on receptors at the project site. The analysis found that there would be no significant impacts related to pesticide drift, and no mitigation measures were required. The project-specific analysis provided below expands this discussion to include the impact of pollutants generated during construction and operation on sensitive receptors within proximity to the site.

Carbon Monoxide Hotspots

Exposure to high concentrations of CO can result in dizziness, fatigue, chest pain, headaches, and impairment of central nervous system functions. Mobile source impacts, including those related to CO, occur essentially on two scales of motion. Regionally, project-related construction travel would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SSAB. Locally, construction traffic would be added to the roadway system in the vicinity of the project site. Although the SSAB is currently an attainment area for CO, there is a potential for the formation of microscale CO "hotspots" to occur immediately around points of congested traffic. Hotspots can form if such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and/or is operating on roadways crowded with non-project traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SSAB is steadily decreasing.

The proposed project would have trip generation associated with construction worker vehicles and construction vendor trucks. Title 40 of the California Code of Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM₁₀, and PM_{2.5} Concentrations (hot-spot analysis), states that “CO, PM₁₀, and PM_{2.5} hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established ‘Guideline’ methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site” (40 CFR 93.123). Accordingly, while proposed project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities would last approximately 19 months and would not require a project-level construction hotspot analysis. As such, potential project-generated impacts associated with CO hotspots would be **less than significant**.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. Health effects from carcinogenic air toxics are usually described in terms of cancer risk, with a recommended an incremental threshold of 10 in 1 million. “Incremental cancer risk” is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects, which are evaluated using a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects (OEHHA 2015). The greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment use.

DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts; however, no short-term, acute relative exposure level has been established for DPM. Total project construction would last approximately 19 months, after which construction-related TAC emissions would cease. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual receptor; however, such assessments should also be limited to the period/duration of activities associated with the project. A 19-month construction schedule represents a short duration of exposure (5% of a 30-year exposure period), while cancer and chronic risk from DPM are typically associated with long-term exposure.

Exhaust PM₁₀ is typically used as a surrogate for DPM, and as shown in Table 1, which presents total PM₁₀ from fugitive dust and exhaust, project-generated construction PM₁₀ emissions are anticipated to be minimal, and well below the ICAPCD threshold. In addition, sensitive receptors are located approximately 1,400 feet from the active project construction areas, which would reduce exposure to TACs as TAC emission dispersion increases with distance. Due to the relatively short period of construction activity and minimal DPM emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks. In addition, the proposed project would be required to comply with the following measures, which are required by state law to reduce diesel particulate emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-Use Off-Road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, Section 2449), the

purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.

- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to 5 minutes; electric auxiliary power units should be used whenever possible.

During operation, the project would include minimal sources of TAC emissions, including use of a diesel-powered emergency generator. Given the minor increase in emissions and distance to the closest receptor (i.e., approximately 1,400 feet), operational activities are not expected to be a significant source of DPM or associated potential health impacts.

Given the relatively brief construction period and the nature of proposed project operations, implementation of the proposed project is not anticipated to expose sensitive receptors to substantial DPM concentrations and impacts would be **less than significant**.

Health Impacts of Criteria Air Pollutants

The SSAB is designated as nonattainment for O₃ for the NAAQS and CAAQS. Thus, existing O₃ levels in the SSAB are at unhealthy levels during certain periods. The health effects associated with O₃ generally relate to reduced lung function. Because the proposed project would not involve construction activities that would result in O₃ precursor emissions (ROG or NO_x) that would exceed the ICAPCD thresholds, the project is not anticipated to substantially contribute to regional O₃ concentrations and associated health impacts. Similar to construction, operation would not lead to exceedance of any ICAPCD threshold.

In addition to O₃, NO_x emissions contribute to potential exceedances of the NAAQS and CAAQS for nitrogen dioxide (NO₂) (since NO₂ is a constituent of NO_x). Exposure to NO₂ can cause lung irritation, bronchitis, and pneumonia, and lower resistance to respiratory infections. As depicted in Tables 1 and 2, proposed project construction and operation would not exceed the ICAPCD localized thresholds for NO_x. Thus, construction and operation of the proposed project are not expected to exceed the NO₂ standards or contribute to associated health effects.

CO tends to be a localized impact associated with congested intersections. CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. CO hotspots were discussed previously as a less than significant impact. Thus, the proposed project's CO emissions would not contribute to the health effects associated with this pollutant.

The SSAB also is designated as nonattainment for PM₁₀ under the NAAQS and CAAQS. Particulate matter contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing (EPA 2022). As with O₃ and NO_x, the proposed project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed ICAPCD thresholds. Accordingly, the proposed

project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related regional health effects for these pollutants.

In summary, the proposed project would not result in any potentially significant contribution to local or regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Impacts would be **less than significant**.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

The IS prepared for the 2003 EIR found that there would be “no impact” related to objectionable odors affecting a substantial number of people. Given that the proposed project's construction and operational activities are within the scope of the certified 2003 EIR, the proposed project remains consistent with and encompassed by that determination. A discussion of odors specific to the proposed project is provided below for additional context.

Construction

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the proposed project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors would be temporary, disperse rapidly from the proposed project site, and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be **less than significant**.

Operation

Land uses and industrial operations that are potential sources of odor include wastewater treatment plants, sanitary landfills, composting stations, feedlots, asphalt plants, painting/coating operations, and rendering plants (ICAPCD 2017). In addition to the odor source, the distance between the sensitive receptor(s) and the odor source, as well as the local meteorological conditions, are considerations in the potential for a project to frequently expose the public to objectionable odors. Although localized air quality impacts are focused on potential impacts to sensitive receptors, such as residences and schools, other land uses where people may congregate (e.g., workplaces) or uses with the intent to attract people (e.g., restaurants and visitor-serving accommodations) should also be considered in the evaluation of potential odor nuisance impacts. The proposed project would include education facilities development consistent with the land uses analyzed in the certified 2003 EIR, which are not expected to produce any nuisance odors; therefore, impacts related to odors caused by the proposed project during operations would be **less than significant**.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Potential impacts of the Brawley Center Master Plan related to species listed as candidate, sensitive, or special status were evaluated in Section 3.4, Biological Resources, of the certified 2003 EIR. The MMRP adopted in conjunction with the EIR includes a mitigation measure that requires implementation of mitigation

protocols for the burrowing owl (*Athene cunicularia*), a migratory bird protected under the MBTA (SDSU 2003, MMRP, p. 11-2). The mitigation includes prescriptions for relocation prior to construction and subsequent monitoring activities. The EIR concluded impacts would be less than significant with mitigation.

Based on the current analysis, the study area contains trees, shrubs, and bare ground that would potentially be used by migratory birds for breeding. Direct impacts to migratory nesting birds must be avoided to comply with the MBTA and California Fish and Game Code. Indirect impacts to nesting birds from short-term, construction-related noise could result in decreased reproductive success or abandonment of an area as nesting habitat if construction were conducted during the breeding/nesting season (i.e., January through August). Therefore, direct and indirect impacts to nesting birds would be significant absent mitigation. Implementation of recommended mitigation measure **BIO-1** (see below) would ensure that nesting birds would not be impacted by project construction activities during nesting season. As such, impacts to nesting birds would be **less than significant with mitigation incorporated**.

In addition, burrowing owl is a Species of Special Concern and has a moderate potential to occur in the study area. As such, project implementation could result in direct impacts on burrowing owl in the form of habitat destruction and potential death, injury, or harassment of nesting birds, their eggs, and their young. Injury or mortality occurs most frequently during the vegetation clearing stage of construction and affects eggs, nestlings, and recently fledged young that cannot safely avoid equipment. Indirect impacts to burrowing owl include vibration, excess noise, chemical pollution, fugitive dust, and increased human presence. Direct and indirect impacts to burrowing owl specific to construction of the proposed project therefore would be potentially significant, absent additional mitigation beyond the general mitigation previously adopted as part of the 2003 EIR. However, these impacts would be avoided and minimized through implementation of recommended mitigation measure **BIO-2** (see below). This mitigation measure requires pre-construction surveys, establishment of exclusion buffers around occupied burrows or burrow complexes (buffer width is dependent upon breeding versus non-breeding season), and burrowing-owl-specific monitoring throughout construction to ensure full avoidance of owls. Should it be determined that full avoidance of occupied burrowing owl burrows or burrow complexes is not possible, mitigation measure **BIO-2** requires preparation of a Burrowing Owl Relocation and Mitigation Plan that would include methods for passive relocation; description of surrounding suitable habitat conditions; monitoring and management requirements for replacement burrow sites in coordination with CDFW (in accordance with CDFG 2012); reporting requirements; and compensatory mitigation, if required by CDFW. With implementation of mitigation measure **BIO-2**, impacts to burrowing owl would be **less than significant with mitigation incorporated**.

BIO-1: Pre-Construction Nesting Bird Survey. If ground disturbance and/or vegetation clearance activities are scheduled to occur during the avian nesting season (February 15 to August 30), SDSU, or its designee, shall retain a biologist to conduct a pre-construction nesting bird survey within the area to be disturbed and a 500-foot buffer. Surveys should be conducted within 3 days prior to initiation of activity between dawn and noon.

If construction begins outside the nesting bird season (i.e., between August 31 and February 14), work may proceed without a nesting bird survey. If construction begins outside the nesting season, but crosses into the nesting season (i.e., start in January but work until March), construction activities may proceed without a nesting bird survey. However, anytime construction must pause for more than 72 hours during the nesting

season, an updated nesting bird survey should be conducted prior to the resumption of construction activities.

If an active nest is detected during the nesting bird survey, avoidance buffers shall be implemented as determined by a biologist retained by SDSU. The buffer should be of sufficient distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the biologist until nestlings have fledged and dispersed, or it is confirmed that the nest has been unsuccessful or abandoned.

BIO-2: Burrowing Owl Avoidance and Relocation. Prior to the initiation of construction activities, SDSU, or its designee, shall retain a biologist to conduct a pre-construction survey for burrowing owl to determine the presence/absence of the species. SDSU shall submit at least one burrowing owl pre-construction survey report to the satisfaction of CDFW to document compliance with this mitigation measure. For the purposes of this mitigation measure, “qualified biologist” is a biologist who meets the requirements set forth in the 2012 California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation (CDFW 2012).

The survey shall be conducted within 30 days of site disturbance in accordance with the most current and applicable CDFW protocol. If burrowing owls are not detected during the survey, no additional surveys or mitigation is required. Preconstruction surveys shall observe suitable burrowing owl habitat within the Project footprint and within 500 feet of the Project footprint (or within an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists).

Nesting Season Observation

If burrowing owl is located during the survey, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg laying and incubation, or that juveniles from the occupied burrows are foraging independently and capable of independent survival. If occupied burrows are present during the nesting season, construction activities may commence, or resume as applicable, after non-disturbance buffers are implemented by a biologist in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). If burrows are present, the biologist shall be contracted to perform monitoring during all construction activities approximately every other day. However, the definitive frequency and duration of monitoring shall be dependent on whether it is the breeding versus non-breeding season and the efficacy of the disturbance buffers, as determined by the biologist and in coordination with CDFW.

Non-Breeding/Non-Nesting Observation

If burrowing owl is detected during the non-breeding/non-nesting season (September 1 through January 31) or if confirmed to not be nesting, a non-disturbance buffer between

the project activities and the occupied burrow shall be installed by a qualified biologist in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). However, under these circumstances, monitoring by the biologist is not required.

Avoidance Not Possible through Non-Disturbance Buffers

If avoidance is not possible through the installation of non-disturbance buffers, SDSU, or its designee, shall prepare a Burrowing Owl Relocation and Mitigation Plan for submittal and approval by CDFW. Once approved, the Plan shall be implemented to relocate burrowing owls from the project site.

- b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The 2003 IS prepared for the Brawley Center Master Plan EIR determined that no impact related to adverse effects on riparian habitat or other sensitive natural communities would occur.

The study area does not contain riparian vegetation communities or any vegetation communities identified as sensitive according to CDFW. As a result, **no impacts** to sensitive communities are expected to occur.

- c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The IS prepared for the Brawley Center Master Plan 2003 EIR determined that no impact related to adverse effects on wetlands would occur.

The project site does not contain wetland waters of the United States or state. The study area contains potential non-wetland waters of the United States and non-wetland waters of the state; however, all features are located outside the project footprint, near the perimeter of the Brawley Center site, and direct impacts would be avoided. Indirect short-term impacts to jurisdictional waters include changes to hydrology, erosion, chemical pollution, and fugitive dust, and substantial long-term impacts include hydrology alterations and chemical pollution. Indirect impacts to jurisdictional waters would be significant without mitigation. Mitigation measure **BIO-3** requires that the work limits be appropriately flagged and that equipment and spoil sites be placed in uplands within the proposed development area. Implementation of mitigation measure **BIO-3** would reduce potential indirect impacts to jurisdictional waters outside of the project footprint to a **less than significant level with mitigation incorporated**.

BIO-3: General Avoidance and Minimization Measures. SDSU, or its designee, shall implement the following measures during project construction activities to avoid indirect impacts to aquatic resources:

- Construction limits should be clearly flagged so that adjacent native vegetation is avoided.

- Construction work and operations and maintenance areas should be kept clean of debris, such as trash and construction materials. Fully covered trash receptacles that are animal-proof should be installed and used during construction to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Trash contained within the receptacles should be removed from the work area at least once a week.
- Staging and storage areas for spoils, equipment, materials, fuels, lubricants, and solvents should be located within the designated impact area or adjacent developed areas.
- Best management practices (BMPs) should be implemented to ensure water quality in existing drainages would not be affected during project activities.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The IS prepared for the Brawley Center Master Plan 2003 EIR determined that no impact related to wildlife movement or migration would occur.

The project site is largely surrounded by agricultural fields under cultivation and is not located within an area that functions as a wildlife movement or migration corridor. As such, the proposed project would not constrain natural wildlife movement in its vicinity and **no impact** would occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The IS prepared for the Brawley Center Master Plan 2003 EIR determined that no impact related to conflicts with local biological resources policies or ordinances would occur.

As proposed, the project would not conflict with any local policies or ordinances protecting biological resources. Therefore, **no impact** would occur to any biological resources protected by a local ordinance.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The IS prepared for the Brawley Center Master Plan 2003 EIR determined that no impact related to conflicts with local biological resources policies or ordinances would occur.

There are no habitat conservation or natural community plans that have been implemented for the project area. IID developed a planning agreement in 2006 for a regional HCP; however, that plan is still in development and has not been implemented (CDFG 2006). As such, the project would not conflict with any applicable plans and **no impact** would occur.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

Impacts to historical resources pursuant to Section 15064.5 were evaluated in the IS prepared for the 2003 Brawley Center Master Plan EIR, which concluded that no significant impacts to historical resources would occur.

Dudek's cultural resources inventory of the project indicates that there is low sensitivity for identifying intact subsurface historical resource deposits during project implementation. A records search from the South Coastal Information Center (SCIC) did not identify any historical resources within the project area. Additionally, an intensive pedestrian survey did not identify any historical resources within the project area. The project area has been previously disturbed as a result of the development including, adjacent parking lot and existing Brawley Center buildings, graded access roads, irrigation ditches, and active agricultural field. No historical resources pursuant to Section 15064.5 were identified within the project area. Aerial photographs show that the project area has been the site of active agricultural fields since 1953, and SDSU's first buildings at Brawley Center appeared within the project area in 2009. There are no historic-era (greater than 45 years old) structures within the project area. Therefore, the project would not result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 and potential impacts to historic resources as a result of project implementation would be **less than significant**.

b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

Impacts to archaeological resources pursuant to Section 15064.5 were evaluated in Section 3.5, Cultural Resources, of the 2003 EIR. A mitigation measure was adopted that outlines response protocol and requirements in the event that potential resources are discovered during excavation and/or construction associated with buildout of the campus (see SDSU 2003, MMRP, pp. 11-2 through 11-3). With implementation of the mitigation measure, impacts were determined to be less than significant.

Dudek's cultural resources inventory of the project indicates that there is low sensitivity for identifying intact subsurface archaeological resource deposits during project implementation. A records search from the SCIC did not identify any archaeological resources within the project area. Additionally, an intensive pedestrian survey did not identify any archaeological resources within the project area. The project area has been disturbed from the shaded seating area, adjacent parking lot and existing campus structures, graded access roads, irrigation ditches, and active agricultural field. No archaeological resources pursuant to Section 15064.5 were identified within the project area. The review of aerial photographs reveals that a majority of the project area has been heavily disturbed by construction of the existing campus structures and agricultural activities. Any intact archaeological subsurface deposits that were present would have been disturbed by years of continuous agricultural activities and would no longer remain intact.

However, because the project includes ground disturbance associated with construction of the new building, the potential to encounter and/or destroy previously undiscovered archaeological materials or features during earth-moving activities exists. Any substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 would be a potentially significant impact. The Cultural Resources mitigation measure included in the 2003 EIR MMRP and previously adopted by the CSU, in addition to mitigation measure **CUL-1**, presented below, would reduce potentially significant impacts to a **less-than-significant level with mitigation incorporated** by requiring construction to halt in the event of an archaeological discovery during construction activities, and evaluation of the find by a qualified archaeologist.

CUL-1: If CSU/SDSU, or its designee, discovers, through the building contractor, any artifacts during excavation and/or construction of the Brawley Sciences building, CSU/SDSU shall direct the contractor to stop all affected work and call in a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards to assess the discovery and, if necessary, suggest further mitigation.

If CSU/SDSU, or its designee, discovers, through the Contractor, human remains during construction of the Brawley Sciences building, CSU/SDSU, or its designee, shall contact the county coroner and a qualified archaeologist. If the remains are determined to be Native American, CSU/SDSU shall contact the appropriate tribal representatives to oversee removal of the remains. If any buried cultural deposits are discovered during construction, development should be suspended or directed to another location and the discovery protected and evaluated for its potential eligibility for listing on the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR). Construction activities may continue in other areas, but should be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA or eligible for listing on the NRHP or the CRHR and avoidance is not feasible, additional work such as data recovery may be warranted. Following evaluation by a qualified archaeologist and in consultation with CSU/SDSU, construction shall be permitted to resume.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

The IS prepared for the 2003 EIR determined that no impacts to human remains would occur within the boundaries of Brawley Center. However, as previously noted, 3.5 Cultural Resources Mitigation Measure was adopted, which notes that SDSU construction contracts address the discovery of human remains and

require notification of the County Coroner and a qualified archaeologist in the event of such discovery, and if the remains are determined to be Native American, require contact of the appropriate tribal representatives to oversee removal of the remains.

The project area is not used as a cemetery and is not otherwise known to contain human remains. The pedestrian field survey conducted for the project did not identify any human remains or find any indications that they would be expected to be found at the project area. However, although unlikely, there is the possibility of human remains being discovered during construction-related ground-disturbing activities. If remains are discovered during project construction activities, SDSU and its construction contractor, consistent with the previously adopted mitigation measure, would comply with procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5).

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete inspection within 48 hours of being granted access to the site and make recommendations for the treatment and disposition, in consultation with the property owner, of the human remains.

Compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097, together with implementation of the previously adopted mitigation measure, would ensure avoidance or minimized disturbance of potentially encountered human remains as well as appropriate treatment of any remains that are discovered. Impacts would be **less than significant with mitigation incorporated**.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

At the time the 2003 EIR was certified, an evaluation of energy was not required under CEQA. Pursuant to CEQA Guidelines Section 15168(c)(1), an analysis of the proposed project's energy impacts relating to construction and operation of the proposed sciences building has been prepared as described below.

a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Implementation of the proposed project would result in energy use for construction and operation, including use of electricity, propane, and other petroleum-based fuels. The electricity and fuel used for construction of the proposed project would be temporary, would be substantially less than that required for project operation, and would have a negligible contribution to the project's overall energy consumption. Additionally, although electricity usage at Brawley Center would increase due to the implementation of the project, the project's energy efficiency would exceed the current Building Energy Efficiency Standards (Title 24) in accordance with the CSU Sustainability Policy. Further, while the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time.

The proposed project's impact related to energy resources is discussed separately below for construction and operation. Energy consumption (electricity and petroleum consumption) was estimated using CalEEMod data from the air quality and GHG assessment. For further detail on the modeling parameters and results of the energy analysis, please refer to Appendix B, Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

Construction Energy Use

Electricity

Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities would require electricity, including the conveyance of water that would be used for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. IID is the electricity provider to the project site and provided approximately 3,520 gigawatt-hours of electricity in 2021 (CEC 2023a). Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available IID electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Petroleum-Based Fuels

Petroleum-based fuel usage represents most energy consumed during construction. Petroleum fuels would be used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, as well as construction material delivery truck trips.

Fuel consumption from construction equipment and vehicles was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to

gallons of gasoline or diesel. All off-road equipment and vendor trucks are anticipated to use diesel fuel, while worker vehicles are analyzed based upon gasoline fuel use. Construction is estimated to last approximately 19 months beginning in January 2024. The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon (The Climate Registry 2021). The estimated diesel fuel usage from construction of the proposed project is shown in Table 3.

Table 3. Estimated Construction Fuel Use

Construction Year	Off-Road Equipment	On-Road Trucks	On-Road Workers
	Fuel Use (gallons)		
2024	21,325	2,245	2,944
2025	13,055	1,436	1,914
Total	34,379	3,681	4,858

Notes:
See Appendix B, Attachment B for complete results.
Totals may not sum precisely due to rounding.

As shown in Table 3, construction of the proposed project is anticipated to require 4,858 gallons of gasoline and 38,060 gallons of diesel over the 19-month construction period. The proposed project would be required to comply with CARB’s Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to 5 minutes. The proposed project would also be subject to CARB’s In-Use Off-Road Diesel Vehicle Regulation that requires the vehicle fleet to reduce emissions by retiring, replacing, repowering older engines, or installing Verified Diesel Emissions Control Strategies. Furthermore, earthwork at the project site would be balanced, which supports efficiency during construction given that overall truck trips would be minimized. Therefore, impacts associated with construction energy use would be **less than significant**.

Operations Energy Use

Electricity

The proposed project would require electricity for multiple purposes at buildout, including cooling, lighting, appliances, etc. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the CalEEMod outputs presented in Appendix B, Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

CalEEMod default values for energy consumption for the proposed project were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings is divided by the program into end-use categories subject to Title 24 requirements (end-uses associated with the building envelope, such as the heating, ventilating, and air-conditioning [HVAC] system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous “plug-in” uses).

Total annual electricity demand associated with proposed project operation would be approximately 1,106,361 kilowatt-hours (kWh) per year. The 54 kW on-site photovoltaic (PV) solar system is expected to

accommodate approximately 8.6% of the proposed project's total annual electrical demand, for a net electrical demand of 1,009,742 kWh/year required from the grid. For context, in 2021, California used approximately 280 billion kWh of electricity (CEC 2023b). Locally, in 2021, non-residential electricity demand in Imperial County was approximately 0.84 billion kWh (CEC 2023b).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2022 standards, became effective on January 1, 2023. The proposed project would exceed the Title 24 Building Energy Efficiency Standards by at least 10% in compliance with the CSU Sustainability Policy. Exceedance of the applicable Title 24 standards would reduce overall energy consumption of the proposed project and would ensure that the energy demands would not be inefficient, wasteful, or otherwise unnecessary, and the project's effect on electrical demands during operation would be **less than significant**.

Natural Gas

Consistent with CSU's aim to minimize use of natural gas and transition to electric alternatives, operation of the proposed project would be fully electric and would not require natural gas. As such, there would be no impact to natural gas related supply and infrastructure capacity and the project's effect on natural gas demands during operation would be **less than significant**.

Petroleum

During operation, fuel consumption resulting from the project would involve the use of landscaping equipment and use of the emergency generator. Additionally, a propane tank would be provided on site for the dedicated purpose of supporting lab spaces and other instructional uses. As discussed previously, the proposed project would not increase the Brawley Center Master Plan's approved 850 FTE student enrollment. Given that the allowable FTE growth was analyzed in the certified 2003 EIR and approved as a component of the Brawley Center Master Plan, the scope of this analysis does not include impacts from the related mobile trips, including their petroleum use.

Annual petroleum use from operation of landscaping equipment and the emergency generator would be approximately 495 gallons per year. Petroleum consumption from propane use during operation would be approximately 7,600 gallons per year. By comparison, California as a whole consumed approximately 22 billion gallons of petroleum in 2020 (EIA 2023) and in 2021 the County consumed approximately 74 million gallons of gasoline, and 27 million gallons of diesel (CEC 2022). As such, petroleum demand required for implementation of the proposed project is relatively insignificant and would not be inefficient, wasteful, or otherwise unnecessary. The project's effect on petroleum supply during operation would be **less than significant**.

In summary, implementation of the project would increase the demand for electricity and petroleum in the region during construction and operation. However, because the project would implement all current, applicable regulations and policies, the project would not be wasteful, inefficient, and would not result in unnecessary energy resource consumption. Relatedly, since the proposed project would comply with and exceed the Title 24 energy conservation standards pursuant to the CSU Sustainability Policy, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy. Moreover, on-site PV solar is expected to accommodate approximately 8.6% of the proposed project's electrical demand during operations. Therefore, impacts would be **less than significant**.

Of note, and consistent with the discussion of GHG emissions impact above (see Appendix B, Section 5.1.2, Greenhouse Gas Emissions Assessment Impact Analysis), it is likely that energy use estimated here is well below what would have been estimated had energy been analyzed in the 2003 EIR. Since 2003, the State of California has enacted a comprehensive suite of laws to increase efficiencies and thereby reduce energy use associated with water use, solid waste disposal, and building energy use, among others. Accordingly, construction and operation of the proposed project benefits from the current legal landscape, which serves to reduce energy demand as compared to what was in place in 2003.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. At a minimum, the proposed project would be subject to and would comply with the 2022 California Building Code Title 24 (24 CCR, Part 6). Additionally, as discussed in Section 5.1.2, the proposed project would not conflict with CSU's Sustainability Policy or the SDSU CAP, which was adopted in 2017 to achieve carbon neutrality, in part, through goals and strategies that support increased energy efficiency and transition to renewable energy alternatives campuswide. Specifically, no natural gas would be used on site, and all space and water heating would be electrified, which is consistent with CSU's aim to minimize use of natural gas and transition to electric alternatives.

The proposed project would also not conflict with CARB's Climate Change Scoping Plan, which identifies several strategies to reduce GHG emissions through energy efficiency. As discussed in further detail in Section 5.1.2, the proposed project would be subject to these strategies as many are state actions requiring no additional involvement at the project level. As such, implementation of the proposed project would not conflict with applicable plans for energy efficiency, and the impacts during construction and operation would be **less than significant**.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Impacts related to rupture of a known earthquake fault were evaluated in Section 3.2, Geology/Soils, of the 2003 EIR, which concluded that the Brawley Center is not within the limits of the Alquist-Priolo Special Studies Zones of the Imperial and Brawley faults. Accordingly, the 2003 EIR did not provide an impact conclusion regarding potential rupture of a known earthquake fault.

The proposed project involves construction and operation of a new sciences building within the footprint of Building 107, as identified in the approved Brawley Center Master Plan and analyzed in the previously certified 2003 EIR. As discussed above, the Holocene-active Imperial and Brawley faults are the closest faults to the Brawley Center. As illustrated in Appendix E on Figure 3, Regional Faulting, the northern terminus of the Brawley Fault is approximately 2 miles south of the Brawley Center and the northern terminus of the Imperial Fault is approximately 3.5 miles southwest of the center. The Brawley Center is not located in an Alquist-Priolo Earthquake Fault Zone associated with either of these faults. No new

information or substantial changes in circumstances have occurred requiring new or additional analysis with regard to rupture of a known earthquake fault at the project site. As a result, surface fault rupture is not anticipated at the project site and the project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. **No impact** would occur.

ii) Strong seismic ground shaking, or

iii) Seismic-related ground failure, including liquefaction?

Impacts related to seismic ground shaking, seismic related ground failure, and liquefaction were evaluated in Section 3.2 of the 2003 EIR, which concluded that although no geotechnical conditions have been identified to preclude development of the IVC Brawley projects as planned, geology/soils impacts would be significant because of the hazards from seismic activity if proper construction techniques are not observed at the detailed design and construction stages. Mitigation measures were provided that require SDSU to (1) avoid adverse discontinuities in strength between major structural elements; (2) prior to detailed site planning, conduct a subsurface geotechnical and soils study to ensure structural integrity; and (3) adhere to recommendations of the geotechnical and soils study in developing grading and construction plans (SDSU 2003, MMRP, p. 11-1). With implementation of these mitigation measures, impacts were determined to be less than significant.

Updated information since completion of the 2003 EIR related to seismicity, including liquefaction and fluid injection, are summarized below. The Imperial Valley area is subjected to frequent seismic events, with related concerns of ground shaking and liquefaction. The most noteworthy of the numerous faults traversing the Salton Trough is the Holocene-active Coachella section of the San Andreas Fault. Two other major northwest-trending Holocene-active fault zones bounding the Salton Trough include the San Jacinto Fault on the northwest and the Elsinore Fault on the southwest (Appendix E, Figure 3). In addition, the Holocene-active Imperial and Brawley faults are located south of the Brawley Center and the Brawley Seismic Zone is located approximately 3 miles west of the Brawley Center. Fluid injection and geothermal energy extraction in the North Brawley Geothermal Field, located within the Brawley Seismic Zone, have been linked to seismic hazards.

The unconsolidated sediments of the Salton Trough, especially in saturated areas such as irrigated lands, are subject to failure during earthquakes as a result of liquefaction. As a result, the proposed project would potentially be subject to liquefaction in the event of a large earthquake. Seismically induced ground shaking can also result in differential settlement and seismic densification because of variations in soil composition, thickness, and initial density.

Since certification of the 2003 EIR, the CEQA significance criteria have been revised (per Appendix G of the 2022 CEQA Statute and Guidelines). Seismic impacts on any given project are no longer considered potentially significant. Rather, impacts would only be considered significant in the event the project directly or indirectly caused seismic impacts to occur. Because construction and operation of the proposed building would not induce seismicity, **no impacts** would occur.

Regardless, the following is an updated discussion of protocol that would be followed with respect to seismic engineering of the proposed building. As required by the 2022 California Building Code (CBC), the proposed Brawley Center building and associated infrastructure improvements would be constructed in accordance with

the recommendations of the project-specific geotechnical report (Appendix E, Attachment B), which includes recommendations for remedial grading and foundation design to address strong seismic ground shaking, liquefaction, differential settlement, and seismic densification. Accordingly, while referred to as “recommendations” in the referenced report, each recommendation is, in fact, required by law to be implemented. More specifically, the geotechnical report recommendations require the use of thickened and heavily reinforced conventional building foundations or post-tensioned slabs to reduce the potential for distress to the proposed building associated with post-liquefaction settlement. The geotechnical recommendations are consistent with CGS [California Geological Survey] Note 48, Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings (CGS 2022). Design and construction to these standards would provide an acceptable level of earthquake safety for students, employees, and the public who occupy the building, to the extent feasible.

In addition, the project would be designed in accordance with the CSU Seismic Requirements (CSU 2020), which include specific requirements for the construction of new buildings, to ensure that all CSU buildings provide an acceptable level of earthquake safety for students, employees, and the public, per the CBC. The CSU Seismic Requirements apply to all structures within the bounds of a CSU campus master plan. These seismic requirements set forth procedures to follow to manage current construction programs and limit future seismic risk to acceptable levels. CSU has established campus-specific seismic ground motion parameters that supersede CBC values and implement a conservative evaluation on CBC Structural Risk Category assignments.

The CSU Seismic Requirements require that all major capital building projects, such as the proposed project, be peer reviewed by the Division of the State Architect (DSA), prior to and during construction. The DSA provides design and construction oversight for K–12 schools, community colleges, and various other state-owned and leased facilities. The DSA also develops accessibility, structural safety, fire and life safety, and historical building codes and standards utilized in various public and private buildings throughout California. This review process starts at project inception and continues until construction completion. Peer review concurrence letters are typically issued at completion of the Schematic and Construction Documents Phases and during the course of construction on deferred submittals that have a seismic component. Resolution of outstanding Seismic Review Board peer review comments is required before start of construction, and resolution of Seismic Review Board construction phase submittals is required prior to occupancy. In addition, the project would be submitted to the CSU Architecture and Engineering, Building Code Plan Check Review process. All approved plans for construction would include a stamp that verifies the design would be completed in compliance with appropriate CSU Seismic Requirements. The stamp would also indicate that the project has been reviewed consistent with Chapter 16 of the CBC and the State Earthquake Protection Law.

Furthermore, the CGS serves as an advisor under contract with the DSA to review engineering geology and seismology reports for compliance with state geologic hazard regulations. For all facility construction, SDSU will be required to send all engineering, geotechnical, and soils reports normally required to comply with the CBC to the CGS to ensure such reports also comply with applicable geologic hazard regulations (i.e., the Field Act and the Seismic Hazards Mapping Act). The CGS has outlined the required scope of geology, seismology, and geologic hazards evaluations under California Code of Regulations, Title 24. Among other things, the reports must be prepared by appropriately licensed professionals and must include adequate site characterization, estimates of earthquake ground motions, assessment of liquefaction/settlement potential, slope stability analysis, identification of adverse soil conditions (e.g., expansive or corrosive soils),

and mitigation recommendations for all identified issues. Final DSA approval of the proposed building will not occur unless DSA receives the final acceptance letter from CGS.

The proposed building and infrastructure improvements would be constructed under the supervision of a California Geotechnical Engineer and/or California Certified Engineering Geologist. In addition, construction and operation of proposed project facilities would not increase the potential for earthquakes or seismically induced ground failure to occur. As a result, the project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking or seismic-related ground failure, including liquefaction. **No impacts** would occur.

iv) Landslides?

The IS prepared for the 2003 EIR determined that no impact would occur with regard to landslides. The topography of the Brawley Center and surrounding area is relatively flat to gently sloping. With implementation of the required recommendations provided in the project-specific geotechnical report, slope instability would not adversely impact the proposed development (Appendix A, Attachment B). In addition, because the topography of the site is relatively flat, grading and construction would not cause slope instability to occur. As a result, the project would not directly or indirectly cause potential substantial adverse effects involving landslides. **No impacts** would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

The 2003 EIR and IS prepared for the 2003 EIR did not specifically address soil erosion and loss of topsoil. Therefore, a discussion regarding the proposed project's potential to result in substantial soil erosion or the loss of topsoil is provided below.

The proposed project site is approximately 1.5 acres in size and the construction staging areas would occupy approximately 1-1/4 acre sf in the area of Brawley Center located southeast of the site and north of SR 78. The project would involve site preparation, grading, and excavation associated with project construction. Excavation depths are anticipated to be 2 to 5 feet, followed by soil backfill and compaction. Project grading and construction would temporarily expose on-site soils to wind and water erosion, which in turn could result in sedimentation of downstream drainages. However, because project construction would involve ground disturbance in excess of 1 acre, grading and construction would be completed in accordance with the requirements outlined in the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (2009-0009-DWQ), effective July 1, 2010 (NPDES Construction General Permit), which includes the development of a stormwater pollution prevention plan (SWPPP). The SWPPP would identify potential water quality pollutants (including erosion-induced sedimentation), identify minimum BMPs to prevent off-site sedimentation, and develop a construction site monitoring plan for the project. After construction, the project site would be developed with impermeable surfaces and approximate 61,200 sf of on-site landscaping, thus eliminating the potential for soil erosion. As a result, the Project would not result in substantial soil erosion or the loss of topsoil and impacts would be **less than significant**.

- c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

The IS prepared for the 2003 EIR concluded that no impacts would occur with respect to potentially unstable geologic units, including landslides, lateral spreading, subsidence, liquefaction, and collapse. Since certification of the 2003 EIR, the CEQA significance criteria have been revised (per Appendix G of the CEQA Guidelines). Geologic hazard impacts on any given project are no longer considered potentially significant. Rather, impacts would only be considered significant in the event the project directly or indirectly caused geologic hazard impacts to occur. Therefore, the following is an updated discussion of potential impacts related to geologic hazards, as well as an updated discussion of protocol that would be followed with respect to geotechnical engineering of the proposed building. In addition, updated information since completion of the 2003 EIR related to liquefaction and subsidence are summarized below. New information pertaining to liquefaction and subsidence is also presented in Appendix E, Section 4.1, Existing Conditions.

As described in Section 3.7(a)ii and 3.7(a)iii, although the project would be susceptible to strong seismically induced ground shaking and liquefaction, project design and construction would be completed in compliance with the 2022 CBC and CGS Note 48, pertaining to seismic design for California public schools. In compliance with the CBC, project design and construction would be completed in accordance with the recommendations of the project-specific geotechnical report (Appendix E, Attachment B). The proposed building would also be subject to review and plan approval by the DSA and the CSU Architecture and Engineering, Building Code Plan Check Review process, prior to and during construction. Compliance with the CBC, DSA review and approval, and CSU Architecture and Engineering review would help to offset potential risks to structures and people associated with liquefaction and collapsible soils. In addition, constructing the proposed building within a liquefaction-prone area would not, in and of itself, increase liquefaction risks to surrounding uses. Although the project site is potentially susceptible to liquefaction, no slopes are present on the site, thus eliminating the potential for lateral spreading to occur (Appendix E, Attachment B). As described in Section 3.7(a)iv, the project would not be susceptible to landslides.

Natural subsidence has been occurring within the Salton Trough, averaging nearly 2 inches per year at the center of the Salton Sea, and decreasing to 0 near the Mexican border. This natural subsidence is relatively uniform over large areas. In addition, subsidence in geothermal fields can result in damage to buildings and related infrastructure. Two geothermal facilities are located approximately 3 miles and 4 miles northwest of the Brawley Center, respectively. As described in Appendix E, Section 4.1, satellite radar interferometry (InSAR) was applied to detect surface deformation associated with geothermal development and concluded that distinct areas of subsidence are present in three geothermal fields in the Imperial Valley: the Salton Sea, Heber, and East Mesa geothermal fields. In addition, ground uplift was observed at the Heber geothermal field. These geothermal fields are located approximately 15 miles northwest, 19 miles south, and 18 miles southeast of the Brawley Center, respectively. Therefore, subsidence as a result of geothermal activity does not appear to be occurring at the project site. Well field programs covering production and injection plans in Imperial County are required by the Bureau of Land Management and the California Geologic Energy Management Division (CalGEM) for each major geothermal project and are subject to review by CalGEM and the County, thus minimizing the potential for subsidence to occur. In addition, construction and operation of the proposed Brawley Center building would not result in substantial adverse impacts such that collapse would occur. As a result, the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result

in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be **less than significant**.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impacts related to expansive soils were evaluated in Section 3.2 of the 2003 EIR, which concluded that although no geotechnical conditions have been identified to preclude development of the IVC Brawley projects as planned, geology/soils impacts are significant because of the hazards from expansive soils if proper construction techniques are not observed at the detailed design and construction stages. Mitigation measures were provided that would require SDSU to (1) prior to detailed site planning, conduct a subsurface geotechnical and soils study to determine the shrink-swell potential, and (2) adhere to recommendations of the geotechnical and soils study in developing grading and construction plans (SDSU 2003, MMRP, p. 11-1). With implementation of these mitigation measures, impacts were determined to be less than significant.

Borings drilled on site indicated the project site is underlain by 1 to 2 feet of fill material, consisting of fat clay. Laboratory testing of these surficial clays indicate these soils have a high to very high expansion potential. Swelling and shrinking soils can result in differential movement of structures including floor slabs and foundations, and project site work including hardscape, utilities, and sidewalks. Project design and construction would occur in compliance with recommendations of the project-specific geotechnical report (Appendix E, Attachment B) and the provisions of the 2022 CBC, which require that grading, structural design, and construction be completed such that potentially expansive soils would not adversely affect foundations, piping, and related infrastructure. More specifically, based on the geotechnical report required recommendations, thickened foundations and slabs, underlain by at least 5 feet of imported granular non-expansive, compacted fill, would be utilized to reduce the potential for future distress to the building associated with soil expansion. Alternatively, a post-tensioned slab-on-grade would be used to support the proposed building. Project design would also be completed in accordance with the DSA and CSU Architecture and Engineering review process. As a result, construction of the project on potentially expansive soils would not create substantial direct or indirect risks to life or property. Impacts would be **less than significant**, and no additional mitigation is required.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The IS completed for the 2003 EIR concluded that no impacts would occur with respect to the use of septic tanks or alternative wastewater disposal systems. No new information is available regarding this environmental criterion. The proposed building would be connected to existing sewer infrastructure operated by the City of Brawley. As a result, septic tanks or alternative wastewater disposal systems would not be used in association with the project. **No impacts** would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The IS prepared for the 2003 EIR determined that no impacts to unique paleontological resources or sites or unique geologic features would occur.

No paleontological resources were identified within the project site or within a 1-mile radius buffer as a result of the institutional records search, paleontological survey, or desktop geological and paleontological review. Lake Cahuilla sediments underlying the project site at an undetermined depth have high paleontological sensitivity and disturbed surficial sediments have low paleontological sensitivity. Based on the records search results and map and literature review, the project site has a high potential to produce paleontological resources during planned construction activities in areas underlain by Lake Cahuilla sediments. In the event that intact paleontological resources are discovered on the project site, ground-disturbing activities associated with construction of the project, such as grading and large-diameter drilling during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. The potential for project activities to damage paleontological resources during construction would result in a potentially significant impact. Mitigation measure **GEO-1**, presented below, would reduce potentially significant impacts to a **less than significant level with mitigation incorporated** by requiring preparation of a Paleontological Resources Impact Mitigation Program (in accordance with SVP 2010) that would involve pre-construction worker awareness training as well as paleontological monitoring and discovery protocol, treatment, reporting, and collection management.

GEO 1: Paleontological Resources Impact Mitigation Program and Paleontological Monitoring. Prior to commencement of any grading activity on site, SDSU or its designee shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) 2010 guidelines to prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP 2010 guidelines and outline requirements for pre-construction meeting attendance and worker environmental awareness training; where paleontological monitoring is required within the project site based on construction plans and/or geotechnical reports; and procedures for adequate paleontological monitoring and discoveries treatment, including paleontological methods (including sediment sampling for micro-invertebrate and micro-vertebrate fossils), reporting, and collections management. The PRIMP shall also include a statement that any fossil lab or curation costs (if necessary due to fossil recovery) are the responsibility of SDSU or its designee.

In addition, a qualified paleontological monitor shall be on site during initial rough grading and other significant ground-disturbing activities (including augering) in areas underlain by Lake Cahuilla sediments. No paleontological monitoring is necessary during ground disturbance within artificial fill, if determined to be present. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed, the monitor will allow grading to recommence in the area of the find.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

At the time the 2003 EIR was certified, an evaluation of GHG emissions was not required under CEQA. Therefore, the impacts of project-related construction and operational GHG emissions was not previously considered. Pursuant to CEQA Guidelines Section 15168(c)(1), an analysis of the proposed project's GHG emissions has been prepared as described below.

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Construction Emissions

CalEEMod was used to calculate the construction GHG emissions based on the construction scenario described in Appendix B, Section 4, Air Quality Assessment. Construction of the project is anticipated to commence in January 2024 and would last approximately 19 months, ending in September 2025. On-site sources of GHG emissions include off-road equipment and off-site sources include vendor trucks and worker vehicles. Additional details are provided in Appendix B, Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

Table 4 presents construction emissions for the project from on-site and off-site emission sources.

Table 4. Estimated Annual Construction Greenhouse Gas Emissions

	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
Year	Metric Tons per Year				
2024	266	0.01	0.01	0.07	269
2025	165	0.01	<0.01	0.05	166
Total	722.78	0.03	0.01	0.12	434.63
<i>Amortized (30-year project life)</i>					14

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R= refrigerants; CO₂e = carbon dioxide equivalent. See Appendix B, Attachment B for complete results. Totals may not add due to rounding.

Operational Emissions

Once operational, the proposed project would result in GHG emissions from energy use, solid waste, water use, wastewater generation, refrigerants, and stationary sources (i.e., the emergency generator). As with construction, GHG emissions from proposed project operations were estimated using CalEEMod based on a combination of project-specific detail provided by the applicant and default parameters, where necessary. All details for operational criteria air pollutants discussed in Section 4, Air Quality Assessment, are also applicable for the estimation of operations-related GHG emissions. As such, see Section 4, Air Quality Assessment, for a discussion of the operational emissions calculation methodology. Additional information for GHG-specific emissions sources is discussed in the following sections.

As noted above, the previously approved FTE student enrollment would not increase with the proposed project above what was already analyzed in the certified 2003 EIR for the approved Brawley Center Master Plan. As such, given that the allowable FTE growth was approved as part of the Brawley Center Master Plan and analyzed in the certified 2003 EIR, the scope of this analysis does not include impacts from the related mobile trips. Therefore, only GHG emissions related to the proposed project's building envelope and site footprint (e.g., energy, solid waste, water) were included in the operational emissions analysis. For additional details see Appendix B, Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

Energy

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the proposed project land use (i.e., University/College). For nonresidential buildings, CalEEMod energy intensity value (electricity or natural gas usage per square foot per year) parameters are based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kWh for electricity or 1,000 British thermal units for natural gas) for CO₂ and other GHGs.

Consistent with CSU's aim to minimize use of natural gas and transition to electric alternatives, no natural gas would be used on site, and all space and water heating will be electrified. Electrifying uses at the site would reduce GHG emissions associated with project operations by converting a portion of the project's forecasted natural gas consumption to electricity. To estimate emissions associated with the elimination of natural gas, use of natural gas during operation of the project was set at 0 kBtu/year (thousand British thermal units per year) in CalEEMod. Electricity consumption (i.e., kWh/year) was adjusted based on the relative efficiency per source of energy use (e.g., efficiency of powering water heaters with electricity versus natural gas). Energy use efficiency data were obtained from the U.S. Energy Information Administration and U.S. Department of Energy, as appropriate. For further details, see Appendix B, Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

Annual electricity emissions were estimated in CalEEMod using the emissions factors for IID, which would be the electricity provider for the project. CalEEMod default energy intensity factors (CO₂, methane [CH₄], and nitrous oxide [N₂O] mass emissions per kWh) for IID are based on the forecasted factors for the operational year. Per the project applicant, the solar PV systems installed at the site would provide approximately 54 kW of renewable power.

As discussed previously, a propane tank would be provided on site for the dedicated purpose of supporting lab spaces and other instructional uses. Emissions from annual propane use were calculated in a spreadsheet model using emission factors from the EPA's Compilation of Air Pollutant Emission Factors (AP-42), Section 1.5, Liquefied Petroleum Gas Combustion, and project-specific usage data points. Approximately 7,600 gallons of propane would be used per year at the site, based on information provided by SDSU.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the proposed project requires the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the proposed project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment (i.e., biological processes). Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values.

Refrigerants

Refrigerants are substances used in equipment for air conditioning and refrigeration. Most of the refrigerants used today are HFCs or blends thereof, which can have high global warming potential values. All equipment that uses refrigerants has a charge size (i.e., quantity of refrigerant the equipment contains), an operational refrigerant leak rate, and a global warming potential specific to the type of refrigerant. GHG emissions related to refrigerant leaks from operation of the proposed project were estimated using CalEEMod default parameters. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime, and derives average annual emissions from the lifetime estimate.

Solid Waste

The proposed project would generate solid waste, resulting in carbon dioxide equivalent (CO₂e) emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation for the proposed land use were used to estimate GHG emissions associated with solid waste.

Table 5 presents the estimated annual GHG emissions generated during operation of the proposed project. The emissions results presented reflect operational year 2026, as it is anticipated to be the first full year of operation following completion of project construction. Details of the emission calculations are provided in Appendix B, Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files.

Table 5. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
	Metric Tons per Year				
Energy	174.78	0.02	0.01	<0.01	176.73
Water Use	2.67	0.06	<0.01	<0.01	4.58
Solid Waste	13.84	1.38	<0.01	<0.01	48.43
Refrigerants	<0.01	<0.01	<0.01	0.02	0.02

Stationary Sources	5.06	<0.01	<0.01	<0.01	5.07
Total Annual Operational Emissions	196.35	1.46	0.01	0.02	234.84
<i>Amortized 30-year Construction Emissions</i>					<i>14</i>
Total Annual Project Emissions					249
<i>SCAQMD Threshold</i>					<i>3,000</i>
Threshold Exceeded?					No

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R= refrigerants; CO₂e = carbon dioxide equivalent.
See Appendix B, Attachment B for complete results.
The values shown are the annual emissions reflect CalEEMod “mitigated” output.
Totals may not add due to rounding.

As shown in Table 5, the estimated total GHG emissions during operation of the proposed project would be approximately 249 MT CO₂e per year, including amortized construction emissions. The proposed project would not exceed the SCAQMD threshold of 3,000 MT CO₂e per year. Projects below this significance criterion have a minimal contribution to global emissions and are considered to have less than significant impacts. Therefore, operational impacts associated with directly or indirectly generating a significant quantity of GHG emissions would be **less than significant**.

Of note, it is likely that emissions estimated here are well below what would have been estimated had GHG emissions been analyzed in the 2003 EIR. Since 2003, the State of California has enacted a comprehensive suite of laws to increase efficiencies and thereby reduce GHG emissions associated with water use, solid waste disposal, and building energy use. Accordingly, construction and operation of the proposed project benefits from the current landscape, which serves to reduce GHG emissions as compared to what was in place in 2003.

b) *Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be **less than significant**. Applicable plans for the proposed project site include the California State University Sustainability Policy, as most recently revised in May 2022; the 2017 Climate Action Plan for San Diego State University (CAP); and CARB’s Scoping Plan. Each of these plans is described below along with an analysis of the proposed project’s potential to conflict with the related GHG emission reduction goals.

Potential to Conflict with the California State University Sustainability Policy

The CSU Board of Trustees adopted its first systemwide Sustainability Policy in May 2014, and most recently revised the Sustainability Policy in May 2022. The Sustainability Policy was developed to integrate sustainability into all facets of the CSU, including academics, facilities operations, built environment, and student life. The Sustainability Policy focuses mainly on energy and GHG emissions, and largely aligns with the State of California’s energy and GHG emissions reduction goals (CSU 2022). It aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum through 11 broad policies, including: University Sustainability; Climate Action Plan; Energy Resilience and Procurement; Energy Conservation, Carbon Reduction, and Utility Management; Water Conservation; Sustainable Procurement; Waste Management; Sustainable Food Service; Sustainable Building & Lands Practices; Physical Plant Management; and Transportation.

The proposed project would comply with all relevant requirements of the CSU Sustainability Policy. For example, the project shall incorporate on-site solar PV; meet or exceed the minimum requirements equivalent to LEED Silver; and, exceed the applicable energy codes and regulations (i.e., California Code of Regulations, Title 24, Part 6 [Building Energy Efficiency Standards]) by 10%. Additionally, no natural gas would be used on-site, and all space and water heating would be electrified, which is consistent with CSU's aim to minimize use of natural gas and transition to electric alternatives.

Potential to Conflict with the 2017 Climate Action Plan for San Diego State University

The SDSU CAP was adopted in May 2017 to provide goals and strategies to achieve carbon neutrality and improve sustainability efforts campuswide. The CAP includes results of a baseline emissions inventory that summarizes GHG emissions from campus operations in 2015 and projected emissions to future years to inform development of appropriate reduction strategies. While the SDSU CAP does include goals and strategies that would result in a reduction of GHG emissions at the proposed project site, the SDSU CAP is not considered qualified per CEQA Guidelines Section 15183.5. Additionally, the CAP was prepared with focus on the SDSU main campus location in La Mesa. Therefore, inclusion of this plan is for informational purposes only.

Emissions sources in the CAP's baseline inventory and emissions projections include energy use, solid waste, water use, and student and faculty/staff commute (i.e., mobile source emissions) associated with activity at SDSU's main campus in La Mesa. Overall, emissions from energy use and mobile sources accounted for the majority of GHG emissions in the baseline inventory, and therefore present the greatest opportunity for future GHG emissions reductions. As previously discussed, the previously approved FTE student enrollment would not increase with the proposed project above what was already analyzed in the certified 2003 EIR for the approved Brawley Center Master Plan. As such, given that the allowable FTE growth was approved as part of the Brawley Center Master Plan and analyzed in the certified 2003 EIR, the scope of this analysis does not include impacts from the related mobile trips. Therefore, only strategies related to the proposed project's building envelope and site footprint (e.g., energy, solid waste, water) would be applicable to this analysis.

The CAP vision for energy highlights a shift from natural gas-based co-generation toward grid energy and on-site renewables. For solid waste, the CAP aims to encourage recycling and move toward zero-waste in the future. The CAP's vision for water use is to encourage efficient landscaping (e.g., drought-resistant and native species, limited turf, and efficient irrigation systems), and ensure ultra-low flow and high-performance fixtures are used for potable systems.

Consistent with this vision, the project will contain no natural gas, and all space and water heating will be electrified. The proposed project would also exceed the Title 24 Building Energy Efficiency Standards by at least 10% and will meet or exceed the minimum requirements equivalent to LEED Silver consistent with the CSU Sustainability Policy, reducing overall energy demand and consumption. Additionally, the proposed project includes on-site solar capable of generating approximately 54 kW of renewable power, which equates to accommodating approximately 8.6% of the proposed project's total annual electricity demand.

As such, the proposed project would support the vision of and not conflict with the overall goal of the SDSU CAP. Specifically, the proposed project's incorporation of on-site solar and elimination of natural gas

supports SDSU's goal to achieve carbon neutrality through increased energy efficiency and reliance on renewable energy alternatives for campus operations.

Potential to Conflict with CARB's Scoping Plan

The California State Legislature passed the Global Warming Solutions Act of 2006 (AB 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the proposed project, the relevant GHG emissions reduction targets include those established by Senate Bill 32 (SB 32) and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 calls upon the state to achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

As defined by AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, with subsequent updates adopted in 2014, 2017, and (most recently) 2022. While the Scoping Plan is not directly applicable to specific projects, it does provide the official framework for the measures and regulations that will be pursued by the state's executive branch of government to reduce California's GHG emissions in alignment with the legislatively adopted targets. Therefore, a project would be found to not conflict with the statutes establishing statewide GHG reduction targets if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

CARB's 2017 Scoping Plan was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017). The most recent Scoping Plan outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279, and assesses the state's progress towards meeting the 2030 SB 32 target (CARB 2022). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plans that outline the strategy to achieve those targets are the most applicable to the proposed project.

To achieve the 2030 goal of 40% below 1990 GHG emission levels, the 2017 Scoping Plan included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), measures to increase the stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and measures to increase the stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, the 2017 Scoping Plan also recommended continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%. Many of these measures and programs would result in the reduction of project-related GHG emissions with no action required at the project-level. These programs would benefit GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (Low Carbon Fuel Standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Implementation of these statewide programs would result in a reduction of operational GHG emissions over the project lifetime.

CARB approved the 2022 Scoping Plan in December 2022 to outline the state's plan to reduce anthropogenic emissions to 85% below 1990 levels by 2045 and achieve carbon neutrality by 2045 or earlier. The 2022 Scoping Plan also assesses the progress the state is making towards reducing GHG emissions to at least 40% below 1990 levels by 2030, as is required by SB 32 and laid out in the 2017 Scoping Plan. The carbon reduction programs included in the 2022 Scoping Plan build on and accelerate those currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022). Implementation of the measures and programs included in the 2022 Scoping Plan largely are the responsibility of policymakers and would result in the reduction of project-related GHG emissions with no action required at the project-level. Given that the proposed project would be fully electric (i.e., no natural gas consumption) and includes on-site solar capable of accommodating approximately 8.6% of the proposed project's total annual electrical demand, implementation would support the 2022 Scoping Plan's goals of displacing fossil-fuel fired electrical generation through use of renewable alternatives.

The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 Scoping Plan to include those that capture and store carbon in addition to those that reduce only anthropogenic sources of GHG emissions. The proposed project would support the state's carbon neutrality goals, as implementation would increase renewable, carbon-free electricity sources within the state, decreasing reliance on fossil fuels. While transitioning to renewable alternatives will support the state's overall climate goals, the 2022 Scoping Plan also indicates that achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Overall, the proposed project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. As mentioned above, several Scoping Plan measures would result in reductions of project-related GHG emissions with no action required at the project-level, including those related to energy efficiency, reduced fossil fuel use, and renewable energy production. As demonstrated above, the proposed project would not conflict with CARB's 2017 or 2022 Scoping Plan updates and with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals. Further, the proposed project's consistency with the applicable measures and programs would assist in meeting the County's contribution to GHG emission reduction targets in California.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Section 3.3 of the Brawley Center Master Plan EIR determined that previous uses of the Brawley site did not result in hazardous material impacts. While hazardous materials, such as petroleum products, were stored on the Brawley site, and pesticides were historically applied, a Phase I Environmental Site Assessment

(ESA) and Phase II ESA were prepared for the 2003 EIR that confirmed no contamination was present in collected samples. Mitigation adopted as part of the EIR recommended hazardous materials be removed from the Brawley site and that additional sampling be conducted following removal of hazardous materials (see SDSU 2003, MMRP, p. 11-2). With implementation of the mitigation, impacts were determined to be less than significant.

The proposed project involves construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the Brawley Center Master Plan and previously analyzed in the 2003 EIR. The new building would be located within the existing Brawley Center boundaries. The northern portion of the proposed project area is presently used for agricultural purposes, similar to the land use observed during the 2003 EIR, and the southern portion of the proposed project site and the proposed staging area have been graded as part of the existing Brawley Center development. As such, as part of the analysis presented here, additional soil samples were collected in the existing agricultural land to verify the presence or absence of hazardous materials, such as organochlorine compounds and arsenic. Three samples collected in the remaining agricultural areas did not contain concentrations of organochlorine compounds above environmental screening levels for unrestricted land use (SFRWQCB 2019), nor did they contain arsenic levels above regional background concentrations (DTSC 2020). As such, there is no evidence of hazardous materials due to former agricultural land use that would affect the proposed project. While construction and operation of the proposed project would require routine use, transport, and disposal of hazardous materials, such as paints, greases, cleaning supplies, and small amounts of diesel and oil (for heavy equipment), as well as any chemicals that may be used as part of the educational function of the proposed project, these materials are regulated under federal, state, and local laws, rules, and regulations such that the use, transport, and disposal must be documented and, if quantities exceed reportable thresholds (55 gallons of liquid, 200 cubic feet of gas, or 500 pounds of a solid), additional reporting and safety measures are required to ensure there are no significant hazards to the public or environment. As such this impact would be **less than significant**, and no additional mitigation is required.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Section 3.3 of the Brawley Center Master Plan EIR determined that previous uses of the Brawley site did not result in hazardous material impacts. As discussed in Significance Standard A, mitigation provided in the 2003 EIR recommended hazardous materials be removed from the Brawley site and recommended additional sampling be conducted following removal of hazardous materials (see SDSU 2003, MMRP, p. 11-2, Footnote 1). With implementation of the mitigation, impacts were determined to be less than significant.

As discussed in Section 3.9(a), soil samples were collected in the agricultural land that would underlie the proposed sciences building to verify the presence or absence of hazardous materials, and no evidence of hazardous materials related to former agricultural land use that may impact the proposed project was found. Also discussed in Section 3.9(a), while construction and operation of the proposed project would require the use of hazardous materials, such as paints, greases, cleaning supplies, and small amounts of diesel and oil (for heavy equipment), as well as any chemicals that may be used as part of the educational function of the proposed project, these materials are regulated under federal, state, and local laws, rules, and regulations such that quantities in excess of reportable thresholds (55 gallons of liquid, 200 cubic feet of gas, or 500 pounds of a solid) require additional reporting and safety measures to ensure there are no

significant hazards to the public or environment. These measures may include, but are not limited to, emergency response plans, spill prevention plans, and reporting of both stored materials and response measures to the local response agency, either the Certified Unified Program Agency and/or the local fire department. As such this impact would be **less than significant** and no additional mitigation is required.

- c) ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

Section 3.3 of the Brawley Center Master Plan EIR determined that previous uses of the Brawley site did not result in hazardous material impacts. As discussed in Section 3.9(a), the mitigation in the 2003 EIR recommended hazardous materials be removed from the Brawley site and recommended additional sampling following removal of any hazardous materials (see SDSU 2003, MMRP, p. 11-2). With implementation of the mitigation, impacts were determined to be less than significant.

As stated in Appendix G, Section 4.1.5, Schools, there are no current or proposed K–12 schools within 0.25 miles of the proposed project site. As such, **no impact** would occur, and no additional mitigation is required.

- d) ***Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

Impacts related to whether the project would be located on a site that is included on a hazardous materials site were evaluated in Section 3.3, Hazardous Materials/Public Safety, of the Brawley Center Master Plan 2003 EIR. A search for hazardous materials sites was conducted as part of the EIR; the Brawley site was not identified on any regulatory databases and impacts were determined to be less than significant. As such, mitigation was not required.

An updated search was prepared, as discussed in Appendix G, Section 4.1.2, Online Regulatory Databases, as part of the current analysis. The Brawley site was not identified on a hazardous materials site regulatory database, nor were any sites identified near the Brawley site with hazardous materials that potentially could impact the environmental condition of the proposed project. As such, **no impact** would occur, and no mitigation is required.

- e) ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

Impacts related to the project's location relative to an airport land use plan or within 2 miles of a public use airport were evaluated in Section 3.1, Land Use and Planning, of the Brawley Center Master Plan EIR. The EIR identified the northwesternmost extremity of the Brawley Center as located within Zone D of the Airport Land Use Compatibility Plan (ALUCP). The EIR determined construction and operation of the university campus would not be considered hazardous to aircraft; therefore, the Brawley Center would not conflict with the ALUCP. Accordingly, impacts were determined to be less than significant and mitigation was not required.

A review of nearby airports was completed as part of the current analysis, as discussed in Appendix G, Section 4.1.6, Airports. The proposed project would not be located within any current ALUCP boundaries,

nor would construction of the proposed project require notification to the Federal Aviation Administration under Title 14 of the Code of Federal Regulations, Part 77.9. As such, **no impact** would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The IS prepared as part of the Brawley Center Master Plan EIR determined that no impact would occur. Additionally, as discussed in Chapter 3.7, Public Services/Utilities, of the EIR, the proposed Brawley Center was not anticipated to significantly increase demand for emergency services as the center was expected to provide security and emergency services. SDSU would enter into a mutual aid agreement with the City of Brawley for fire and police services to ensure adequate response and services. Mitigation was not required.

At the time of the 2003 EIR, the nearest primary fire agency providing assistance to the Brawley Center area was the City of Calipatria Station, 10 miles (15 response minutes) north of the Brawley Center. Currently, the nearest fire station to Brawley Center is the Brawley Fire Department Station 2, located 2.5 miles and 7 response minutes away. This response time is better than that evaluated in the 2003 EIR, and as such, emergency response has improved. As described in Appendix G, Section 4.1.7, Fire Hazards, Imperial County contracts with the City of Brawley through a mutual aid agreement for the provision of fire services to areas within the City's sphere of influence (SOI), including the Brawley Center. As such, the Imperial County Fire Department would continue to provide assistance to the City of Brawley, as discussed in the 2003 EIR. The proposed project would not impact evacuation routes, as there is no proposed construction or shutdown of SR 78. As such, **no impact** would occur, and no additional mitigation is required.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The IS prepared as part of the Brawley Center Master Plan EIR determined that no impact would occur. As discussed in Appendix G, Section 4.1.7, the proposed project is located within a non-wildland/non-urban area, for which there is no identified wildfire hazard. As such, **no impact** would occur. For additional discussion related to potential wildfire impacts, please refer to Section 3.20, Wildfire, of this IS.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Impacts relative to this significance criterion and threshold question are separately addressed in the contexts of project construction and operation.

Construction

Construction impacts related to water quality were evaluated in Section 3.11, Water Quality, of the 2003 EIR, which concluded that the potential surface water and groundwater quality impacts during construction would be less than significant with implementation of a construction SWPPP, as required by the Clean Water Act.

The proposed project involves construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the approved Brawley Center Master Plan and previously analyzed

in the 2003 EIR. Project construction activities, such as grading, excavation, and trenching, would result in disturbance of soils on the project site. Construction site runoff can contain soil particles and sediments from these activities. Dust from construction sites, in addition to spills or leaks from heavy equipment and machinery, staging areas, or building sites can also enter runoff and water bodies. Typical pollutants could include petroleum products and heavy metals from equipment, as well as products such as paints, solvents, and cleaning agents, which could contain hazardous constituents. Sediment from erosion of graded or excavated surface materials, leaks or spills from equipment, or inadvertent releases of construction materials could result in water quality degradation if runoff containing the sediment entered receiving waters in sufficient quantities to exceed water quality objectives. However, contributions of sediment from construction and construction-related pollutants would be minor and not measurable in the context of the watershed as a whole.

The prevailing standard is nevertheless to reduce pollutant contributions to the maximum extent practicable regardless of how minor the sediment contribution might be. Regulations (Phase II Rule) that became final on December 8, 1999, expanded the existing NPDES Program to address stormwater discharges from construction sites that disturb land equal to or greater than 1 acre. The regulations also require that stormwater discharges from small municipal separate storm sewer systems (MS4s) be regulated by an NPDES General Permit for Storm Water Discharges Associated with Construction Activity (Order No. 2009-0009-DWQ, NPDES No. CAS000002), also known as the Construction General Permit.

The Construction General Permit requires the development and implementation of a SWPPP, which describes BMPs the discharger would use to protect stormwater runoff. The SWPPP would incorporate effective BMPs, including silt fences installed along limits of work and the project construction site, stockpile containment (e.g., Visqueen, fiber rolls, gravel bags), exposed soil stabilization structures (e.g., fiber matrix on slopes and construction access stabilization mechanisms), construction of temporary sedimentation basins, limitations on work periods during storm events, and street sweeping. The SWPPP must contain a visual monitoring program, a chemical monitoring program for non-visible pollutants to be implemented if there is a failure of BMPs, and a sediment-monitoring plan, as the site discharges directly to a water body listed on the 303(d) list for sediment. Routine inspection of all BMPs is required under the provisions of the Construction General Permit. Surface water pollution prevention would prevent seepage of contaminants into the underlying groundwater. A copy of the applicable SWPPP would be kept at the construction site.

Non-stormwater discharges during construction would include periodic application of water for dust control purposes. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil but not so excessively as to produce runoff from the construction site. Water applied for dust control would either quickly evaporate or locally infiltrate into shallow surface soils. These stipulations are routine in SWPPPs and other construction contract documents, which typically state that water would only be applied in a manner that does not generate runoff. Therefore, water applied for dust control would not result in appreciable effects on groundwater or surface water features and thus would not cause or contribute to exceedances of water quality objectives contained in the Regional Water Quality Control Board Basin Plan.

No new information or substantial changes in circumstances have occurred requiring new or additional analysis with regard to construction-related impacts to water quality at the project site. As such, potential

project impacts relating to violation of surface water and groundwater quality standards or waste discharge requirements during construction would be **less than significant**, and no mitigation is required.

Operation

The analysis presented in Section 3.11, Water Quality, of the 2003 EIR, concluded that increases in surface runoff would not have a substantial effect on groundwater or surface water quality. Surface flows of freshwater from the site would be lower in salt (i.e., total dissolved solids) concentrations than the Salton Sea; therefore, dilution of Salton Sea water with freshwater would not be a significant impact. In addition, conversion of the project site from agricultural uses to urban uses would reduce the amount of fertilizer and pesticide residues, salts, and selenium infiltrating into soils and groundwater, or discharging to the drainage system. While conversion from agricultural to urban uses would increase surface discharges of total petroleum hydrocarbons and other urban pollutants to local drains and the Alamo River, overall changes in water quality to the Alamo River and the Salton Sea would be insignificant because of the relatively small amounts of runoff from the site relative to the volume of agricultural water draining to these water bodies.

While the 2003 EIR did not identify significant impacts, mitigation measures were adopted recommending that (1) SDSU coordinate separate storm drain and sanitary sewers for project facilities so that stormwater runoff will not increase the frequency or volume of wastewater treatment overflows and (2) a stormwater detention basin be constructed at a capacity equal to the flow level now generated, plus the increase generated by impervious surfaces created during development (see SDSU 2003, MMRP, p. 11-4). With implementation of these mitigation measures, impacts were determined to be less than significant.

The proposed project building would have an area of 36,900 gsf and hardscape improvements would include approximately 41,300 sf of sidewalks and pedestrian walkways, which would connect the project site to the existing building and parking lot. The project would also include approximately 61,200 sf of on-site landscaping. Increased impervious areas and non-point source pollutants associated with the proposed project could alter the types and levels of pollutants that may be present in project site runoff. Runoff from building rooftops, driveways, and landscaped areas can contain nonpoint source pollutants such as sediment, trash, oil, grease, heavy metals, pesticides, herbicides, and/or fertilizers. Concentrations of pollutants carried in urban runoff are extremely variable, depending on factors such as the volume of runoff reaching the storm drains, time since the last rainfall, and degree to which street cleaning occurs. Without design features to capture and treat stormwater runoff, the increase in the developed area could have adverse water quality impacts on downstream drainages and the Alamo River.

Imperial County is enrolled under the State Water Resources Control Board's Phase II Small MS4 General Permit 2013-0001 DWQ, which provides permit coverage for non-traditional MS4s, such as public campuses (SWRCB 2023a). In compliance with this permit, the project would include the construction of bio-retention areas to capture stormwater runoff from stormwater drainages systems that will be located throughout the project site. Bio-retention features function as both water quality and flood control features, by filtering out surface water contaminants and slowing stormwater runoff prior to off-site stormwater discharge. In addition, proposed landscaping would further reduce potential adverse water quality impacts by reducing impervious surfaces, which increase runoff, collect pollutants, and contribute to adverse water quality impacts. With construction of proposed bio-retention features and landscaping, water quality impacts would be minimized such that the project would not violate any water quality standards or waste

discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be **less than significant**, and no additional mitigation is required.

b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The IS prepared for the 2003 EIR determined that no impact would occur with regard to decreased groundwater supplies or groundwater recharge. Following project construction, changes in land cover (e.g., increases in impervious surfaces) ultimately could affect the amount of stormwater that percolates into the ground versus the amount that runs off into downstream drainages and the Alamo River. However, the Brawley Center is surrounded by pervious agricultural areas that facilitate percolation and, as such, construction of the proposed building and associated sidewalks and pedestrian walkways would have a nominal effect on groundwater recharge. In addition, the project would include bio-retention basins that would be located throughout the project site, as well as approximately 61,200 sf of on-site landscaping. These pervious areas would slow runoff and enhance groundwater recharge.

As to any potential impacts related to the direct drawing of groundwater supplies, potable water is provided to the Brawley Center via a Memorandum of Understanding (MOU) with the City of Brawley. Colorado River water, imported via the All American Canal, is the predominant water supply for the project area and is used for irrigation, industrial, and domestic purposes. Thus, the project would not substantially decrease groundwater supplies such that the project would impede sustainable groundwater management of a groundwater basin.

As such, direct impacts of the proposed project on aquifer volumes and the local groundwater table would be negligible. The project would not substantially interfere with groundwater recharge such that the project may impede sustainable groundwater management of the underlying groundwater basin. Impacts would be **less than significant**.

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

- i) *Result in substantial erosion or siltation on- or off-site?***
- ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?***
- iii) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

Impacts related to changes in drainage patterns and potential increased runoff were evaluated in Section 3.8, Hydrology/Flood Control, of the 2003 EIR, which concluded that undergrounding portions of the drainage system could result in upstream backups or increased flooding due to more restrictive conditions. However, undergrounding portions of the drainage system could incrementally improve water quality in the drains by limiting exposure to surface contaminants. In order to provide stormwater runoff protection for downstream properties, drainage improvements were required in order to retain projected 100-year event

storm runoff and release it at existing rates, as allowed by IID. Mitigation measures were adopted recommending that (1) the drainage patterns be coordinated with the City to ensure that new drainage patterns do not adversely affect the City drainage system, (2) a site-specific drainage study and detention basin design be conducted, (3) SDSU coordinate with IID to ensure that relocation and undergrounding plans for canals and drains are designed to maintain existing flow rates and structure capacity, and (4) any temporary relocation of private or IID canals and drainage ditches be coordinated with the affected agencies (see SDSU 2003, MMRP, p. 11-4). With implementation of these mitigation measures, impacts were determined to be less than significant.

The proposed project would involve the construction of additional improvements that would increase the impervious surface area; these include the proposed building, sidewalks and pedestrian walkways, and landscaping. Although the footprint of pervious and impervious areas would change in comparison to existing conditions, drainage from the site would occur at the same outfall locations as those that currently exist. The topography of the site is relatively flat to gently sloping and would not change appreciably as a result of project construction or operation. As a result, impacts relating to alteration of the existing drainage pattern of the site would not be significant.

As discussed in Section 3.10(b), although the amount of impervious surface would increase following project construction, the project would include bio-retention basins that would be located throughout the project site, as well as approximately 61,200 sf of on-site landscaping. These pervious areas would slow runoff such that the project would not substantially increase the rate or amount of surface runoff and result in flooding on or off site, or result in substantial erosion or siltation on or off site. Similarly, inclusion of the bio-retention features and landscaping would reduce runoff such that the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff. For these reasons, impacts would be **less than significant**, and no additional mitigation is required.

iv) Impede or redirect flood flows?

The IS prepared for the 2003 EIR determined that no impact would occur with regard to 100-year flood hazard areas.

As discussed in Appendix H, Section 4.1, Existing Conditions, the Brawley Center is not located within a Special Flood Hazard Area. Therefore, construction of the proposed sciences building would not impede or redirect flood flows. **No impacts** would occur.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The IS prepared for the 2003 EIR determined that no impact would occur with regard to flooding, including flooding as a result of failure of a levee or dam, or inundation by seiche, tsunami, or mudflow.

As discussed in Section 3.10(c)iv, the Brawley Center is not located within a Special Flood Hazard Area. The project site is not located near the Pacific Ocean and would therefore not be susceptible to tsunamis. A seiche consists of oscillations in an enclosed body of water, such as a lake or reservoir, typically as a result of seismically induced ground shaking. No such bodies of water are located adjacent to the Brawley Center; therefore, the proposed building would not be susceptible to inundation by seiche. Since adoption of the 2003 EIR, the CEQA

significance criteria have been revised (per Appendix G of the CEQA Guidelines) and impacts related to failure of a levee or dam, or inundation by mudflow, are no longer evaluated under CEQA. Therefore, flooding related to levees, dams, and mudflows have not been evaluated in this memo. As a result, the project would not risk release of pollutants due to project inundation. **No impacts** would occur.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The 2003 EIR and IS prepared for the 2003 EIR did not specifically address conflict with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan. Therefore, a discussion regarding this issue is provided below. Impacts related to construction and operation of the proposed project are addressed separately.

Construction

As previously noted, the proposed project would be required to comply with the Construction General Permit requiring preparation and implementation of a SWPPP to control runoff from construction work sites. The SWPPP must include BMPs to address transport of sediment and protect properties from erosion, flooding, or the deposition of mud, debris, or construction-related pollutants. Implementation of BMPs, including physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures, would substantially reduce the potential for impacts to surface water quality occurring during construction. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts from construction would be **less than significant**.

Operation

The proposed project would be subject to the requirements of the Water Quality Control Plan for the Colorado River Basin (i.e., Basin Plan; CRBRWQCB 2019), which outlines water quality objectives for all surface water resources within the basin, including the nearby Alamo River. Compliance with the Basin Plan is ensured through waste discharge requirements for all surface water discharges, including stormwater. Imperial County, as a Permittee under the State Water Resources Control Board's Phase II Small MS4 General Permit (2013-0001 DWQ), is required to implement stormwater BMPs that comply with water quality objectives, including capturing and treating stormwater runoff. The project would include construction of numerous biofiltration features and landscaping, which would ensure that the project is consistent with the Basin Plan's water quality objectives.

Further, groundwater would not be used as a water source for the project. Water would be supplied from the Colorado River via the All American Canal. Therefore, the project would not conflict with or obstruct implementation of the Basin Plan or a Groundwater Sustainability Plan (under the Sustainable Groundwater Management Act). As a result, impacts would be **less than significant**.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project physically divide an established community?*

The IS and 2003 EIR determined that no impact related to physical division of an established community would occur as a result of buildout of the approved Brawley Center Master Plan.

The proposed project is the construction and operation of a sciences building to be located within the boundaries of a Brawley Center Master Plan previously approved for such uses. The proposed project would further implement establishment of the community that is the CSU Brawley Center. As such, the proposed project would not physically divide an established community and **no impact** would occur.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The 2003 EIR analyzed consistency with land use plans and policies identified for the City of Brawley and Imperial County in Section 3.1, Land Use and Planning. As previously noted in Chapter 2, Project Description, of this IS, as a state agency, CSU/SDSU is not subject to local land use plans, policies, or regulations. For information purposes, the 2003 EIR noted that because the Brawley Center site was locally designated and zoned for agricultural uses at the time the EIR was prepared, the project would be inconsistent with the City of Brawley's and Imperial County's zoning and general plan designations. The 2003 EIR provided mitigation measures (see SDSU 2003, MMRP, p. 11-1) that would ensure that buildout of Brawley Center would be consistent with the existing land use plans, policies, and regulations that, in fact, did apply to the state-owned Brawley Center.

Although not subject to local government planning and regulations, in the interest of transparency and coordination and for information purposes, CSU/SDSU may consider the local plans and policies of those areas which surround campus locations, as appropriate.

Imperial County's current designation for the campus site, which is geographically located in the unincorporated county, is Government/Special Public land use and zoned as Government/Special Public Zone (G/S) (Imperial County 2023a, 2023b). Implementation of the proposed project would be consistent

with the land use designation and zoning of the site. The proposed sciences building would be sited generally within the footprint of Building 102, as identified in the approved Brawley Center Master Plan and previously analyzed in the certified 2003 EIR. To the extent any adjustments may be necessary to the approved Master Plan to accommodate the proposed project, a Minor Modification would be processed by the CSU as part of the proposed project approvals. Accordingly, implementation of the proposed project would be consistent with both the local government's existing land use designation and zoning of the site and, with the approved Brawley Center Master Plan. Further, as discussed throughout this IS, any impacts associated with construction and operation of the proposed project would be either less than significant, or less than significant with the incorporation of mitigation. Therefore, the project would be consistent with local plans and policies established to protect environmental resources (i.e., General Plan policies). For these reasons, implementation of the proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be **less than significant**.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

The IS prepared for the 2003 EIR determined that no impact would occur with regard to loss of availability of a known mineral resource.

The Imperial County General Plan's Conservation and Open Space Element does not identify the project site as containing existing mineral resources (Imperial County 2016). The proposed project involves construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan analyzed in the EIR. As the project site does not contain existing mineral resources, construction and operation of the proposed project would not result in the loss of availability of a known mineral resource of value to the region or state. **No impact** would occur.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The IS prepared for the 2003 EIR determined that no impact would occur with regard to loss of availability of a locally important mineral resource.

As stated in Section 3.12(a), the Imperial County General Plan does not identify the project site as containing existing mineral resources, including a locally important mineral resource recovery site. As such, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local land use plan. Therefore, **no impact** would occur.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The IS prepared for the 2003 EIR determined that there would be no impact with respect to generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies. The IS similarly concluded no impact due to generation of excessive groundborne vibration or groundborne noise levels and no significant impact regarding exposure of people working or residing in the area to excessive aviation noise levels from sufficiently proximate public or private airports or airfields. For these reasons, the 2003 EIR focused on an assessment of potentially significant temporary or permanent increases to outdoor ambient noise levels. A summary of the prior analysis, including significance determinations and mitigation, if applicable, is provided below.

Consistent with the 2003 EIR, the impact assessment herein includes predictive analyses of construction noise (i.e., temporary noise sources) and permanent noise sources, such as HVAC equipment, etc., that would be installed as part of the proposed project. Durable but localized acoustical additions to the outdoor sound environment on

site due to intermittent and continuous sources, such as steady-state operating HVAC systems, are discussed qualitatively and consistent with the IS finding of no impact to persons on site.

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Short-Term Construction Noise

Chapter 3.9, Noise, of the 2003 EIR included an evaluation of potential impacts related to construction noise based on the technical analysis undertaken and presented in EIR Appendix F. Based on the necessarily programmatic analysis, the 2003 EIR determined that no impact would occur with regard to construction noise.

Construction noise is considered a short-term (i.e., temporary) impact. As CSU is not subject to County standards or thresholds, this discussion notes for information purposes only that construction-related noise would be considered significant if construction activities exceed the allowable hours of operation as permitted by the County threshold of 75 A-weighted decibels (dBA) energy equivalent level (L_{eq}) over an 8-hour period at the nearest sensitive receptor. Such noise-sensitive land uses in the vicinity of the proposed project include a single-family residence to the west (approximately 1,390 feet from the construction boundary). Although additional residences and other noise-sensitive receptors are farther away, the construction noise assessment conducted for the present analysis focused on project-attributed noise exposure levels predicted to occur at these nearest existing residences. Construction noise levels at more distant receptors would be substantially lower, consistent with established acoustical principles of attenuation with geometric divergence and other factors.

Project-generated construction noise will vary depending on the construction process, the type of equipment involved, the location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week), and the duration of the construction work. Using construction equipment information provided by SDSU, project-level construction noise was calculated using a spreadsheet-based model emulating the Federal Highway Administration Roadway Construction Noise Model (FHWA 2008). Table 6, Construction Scenario Assumptions, presents the equipment list used for the construction noise analysis.

Table 6. Construction Scenario Assumptions (Default 5 Days per Week)

Phase	Equipment Type	Quantity	Usage Hours
Site Preparation	Graders	1	8
	Rubber-tired dozers	1	7
	Tractors/loaders/backhoes	1	8
Grading	Graders	1	8
	Rubber-tired dozers	1	8
	Tractors/loaders/backhoes	2	7
Building Construction	Cranes	1	6
	Forklifts	1	6
	Generator sets	1	8

Table 6. Construction Scenario Assumptions (Default 5 Days per Week)

Phase	Equipment Type	Quantity	Usage Hours
	Tractors/loaders/backhoes	1	6
	Welders	3	8
Architectural Coating	Air compressors	1	6

Using the information presented above, construction noise for the proposed project was predicted at a distance of 300 feet (i.e., the same distance used for the prediction of construction noise in the 2003 EIR), as well as 1,390 feet (for the nearest noise-sensitive receptor). Appendix I, Attachment B displays the construction noise model worksheet for the analysis.

As shown in Appendix I, Attachment B, Construction Noise Prediction Model Worksheets, and as a consequence of using construction equipment reference noise data that were available after the 2003 EIR was certified, the predicted aggregate construction noise level at a distance of 300 feet from the project site is expected to be 70 dBA L_{eq} over an 8-hour period for the noisiest phase (Grading) and is 1 decibel (dB) higher than the 68.8 dBA 8-hour L_{eq} estimated in the 2003 EIR. Although the 2003 EIR did not identify a particular quantified dBA limit against which to assess construction noise impact, this predicted exposure level during daytime hours is below Imperial County's criterion of 75 dBA 8-hour L_{eq} or the FTA guidance-based 8-hour L_{eq} threshold of 80 dBA. At the exterior of the nearest apparent noise-sensitive receptor (1,390 feet from the project site), the predicted construction noise level is 57 dBA L_{eq} during the Grading phase, which would not only be much quieter than these standards, but very likely comparable to or less than existing outdoor ambient noise levels, as may be estimated by the matrix in Table 2, Estimated Outdoor Ambient Sound Level (dBA, CNEL) per FTA Guidance (see Appendix I, p. 5). For these reasons, and consistent with the 2003 EIR conclusions, potential impacts associated with project-generated construction noise would be **less than significant**.

Long-Term Operational Noise

Chapter 3.9 of the 2003 EIR and the noise study prepared for the EIR determined that buildout of the Brawley Center Master Plan, including the vehicle trips that would be generated by the approved 850 FTE students, would not result in potentially significant impacts related to traffic roadway noise. The analysis determined that vehicle trips generated by the Brawley Center Master Plan would result in a roadway noise increase over existing conditions of approximately 2 dB, which is below the accepted level of human detectability, and the resulting noise levels would not exceed the applicable significance criteria.

Project-Generated Off-Site Traffic Noise

As noted, the 2003 EIR determined that buildout of the entire Brawley Center Master Plan, including the vehicle trips that would be generated by 850 enrolled FTE students, would not result in significant impacts related to roadway traffic noise. Because roadway noise generated by student enrollment vehicle trips is the primary source of roadway noise, and because the proposed project does not seek to increase, nor would it increase, enrollment beyond the previously approved 850 FTE, no further analysis of potential impacts related to vehicle roadway noise is necessary under CEQA. Moreover, because the proposed project would implement only a portion of the development planned under the approved Brawley Center Master

Plan, the project is expected to generate a number less than 2,000 daily trips to the roadway system, which is the average daily traffic volume expected for the entire 850 FTE students. Therefore, based on the lower anticipated level of traffic that would be generated by the proposed project as compared to that of the entire Brawley Center Master Plan, impacts would also be expected to be **less than significant**.

Project-Generated Operations Noise

The proposed project is consistent with the development of new classroom and administrative buildings described in the 2003 EIR for the future Brawley Center. As a new building, with added available on-site parking that incorporates modern construction techniques and materials, including anticipated HVAC equipment, the project would be sized and constructed in a manner comparable with similar CSU structures and compatible with other buildings in the Brawley area with respect to climate conditions. Electromechanical equipment such as HVAC systems tends to operate continuously and from fixed locations that are typically shielded from direct view by building rooftop parapets or similar solid screens or enclosures for both visual and security reasons. Therefore, and due to the location of the proposed project on the Brawley Center, noise emissions from these stationary sources of steady-state noise would attenuate with distance, intervening structures, acoustical air absorption, and acoustical ground absorption until reaching the nearest noise-sensitive receptor, at which the exposure level would be far below Imperial County property line standards or the existing outdoor ambient level. Thus, impacts would be **less than significant**.

The proposed project would also emit modest levels of noise due to on-site low-speed (or idling) passenger vehicle traffic associated with full- and part-time students, CSU staff and service contractors, and visitors (e.g., deliveries). At such low speeds, engine exhaust noise levels are far less than those emitted by roadway traffic and would thus contribute only low levels of added noise to the outdoor ambient sound environment. For this reason, such on-site traffic noise would be considered a **less-than-significant** noise impact.

Conclusion

As described above, the proposed project would be consistent with buildout of the Brawley Center Master Plan that was contemplated in 2003 EIR. As a result, impacts related to generation of a substantial temporary or permanent increase in ambient noise levels during project construction and operation would be **less than significant**.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The IS prepared for the 2003 EIR determined that there would be no impact with respect to generation of groundborne vibration or groundborne noise levels. Consistent with this finding, due to source-to-receiver distances expected between construction activities undertaken in connection with the proposed project and the nearest potential off-site vibration-sensitive receptors, which are of sufficient distance to attenuate groundborne vibration to less than perceptible levels, impacts would be considered **less than significant**.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The IS prepared for the 2003 EIR determined that there would be no impact with respect to people at the Brawley Center exposed to excessive aviation noise from nearby public and private airports and airfields. According to Figure 4-C (Noise Impact Area) in the local ALUCP pertaining to Brawley Municipal Airport (Imperial County 1996), the Brawley Center is located east of the 65 dBA community noise equivalent level (CNEL) aviation noise contour; therefore, impacts would be considered **less than significant**.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The EIR prepared for the Brawley Center Master Plan evaluated buildout of the Brawley Center with projected 850 FTE students as well as faculty and staff at the project site. The IS prepared for that EIR determined that the increase of students and faculty at the project site would be within the established goals of the Brawley Center Master Plan. As a result, the 2003 EIR determined that there would be no impacts related to population growth.

The proposed project would involve the construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan and previously analyzed in the certified EIR. As described in Chapter 2 of this IS, the proposed project would serve and support the previously approved 850 FTE students projected and, as such, would not increase student enrollment above prior approved levels. While implementation of the proposed project would result in the addition of four new faculty/staff members to support the new facility, in addition to the previously analyzed and approved existing faculty/staff, these employees likely would come from the existing

surrounding communities and, in any event, would not constitute “substantial unplanned population growth” in the area.

The students and faculty/staff that would attend and work at the proposed project are anticipated to commute from surrounding areas, including the City of Brawley. The project would not result in the construction of any new homes, businesses, or infrastructure that would otherwise induce population growth. Because additional students resulting from the proposed project would not increase and/or exceed enrollment beyond the previously analyzed and approved 850 FTE students, implementation of the project would be consistent with the findings of the 2003 EIR and impacts would be **less than significant**.

b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The IS prepared for the 2003 EIR determined that there would be no displacement of people or housing and therefore no impacts would occur.

The proposed project would involve the construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan and previously analyzed in the certified 2003 EIR. Existing uses surrounding the project site include an administrative building and parking lot, solar panels, a substation, agricultural uses, and undeveloped land. No housing currently exists within the Brawley Center, generally, nor on the site of the proposed project, specifically. The proposed building and staging sites would be sited within undeveloped portions of the Brawley Center. Because there is no existing housing at the Brawley Center and the project does not include demolition or modification of any structures that serve as housing, **no impact** related to the displacement of people or housing would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

The 2003 EIR determined that buildout of the approved Brawley Center Master Plan would not substantially increase demand on fire protection services and no impact would occur.

The project site and Brawley Center are located within an area mapped as a Local Responsibility Area by the California Department of Forestry and Fire Protection (CAL FIRE) (2007). The “Local Responsibility Area” designation means that fire response services for the project site and Brawley Center are within the responsibility of a local, rather than state agency—in this case, the Imperial County Fire Department—although the Brawley Center is located on state property. As to the hazard severity designation, the project site and the entire Brawley Center are located within a non-wildland/non-urban area and are not identified by CAL FIRE as within a mapped Fire Hazard Severity Zone. The nearest identified Fire Hazard Severity Zone areas are more than 30 miles to the southwest (a Moderate Fire Hazard Severity Zone near Ocotillo) and more than 45 miles to the northwest (a Very High Fire Hazard Severity Zone near the community of Oasis) (CAL FIRE 2007).

Specific to the provision of fire services at the Brawley Center, Imperial County contracts with the City of Brawley for the provision of fire services to areas within the City’s SOI, which includes the Brawley Center. Further, mutual aid agreements have been established with all cities in the county to address incidents requiring equipment and/or personnel beyond the City Fire Department’s capacity to respond (City of Brawley and Imperial County LAFCo 2012). Please see Section 3.20, Wildfire, of this IS for additional information regarding fire protection services. The Brawley Fire Department has two fire stations, including one main station (Station 1) and one substation (Station 2) (City of Brawley and Imperial County LAFCo 2012). Station 2 is located approximately 1.9 miles northwest of the project site.

The proposed project would involve the construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan and previously analyzed in the certified EIR. As described in Section 3.14, Population and Housing, of this IS, the proposed project would result in the addition of four new faculty/staff members and would serve and support the previously approved 850 FTE students; as such, the project would not increase student enrollment above prior approved levels. Therefore, the proposed project would not substantially increase the demand for fire protection services beyond that previously considered requiring the provision of, or need for, new or physically altered fire protection facilities; therefore, impacts would be **less than significant**.

Police protection?

The previously certified EIR determined that the approved Brawley Center Master Plan would not substantially increase demand on police protection services and no impact would occur. The EIR states that SDSU shall enter into a mutual aid agreement with the City of Brawley Police Department to ensure that adequate services are provided.

The SDSU University Police Department (UPD) provides general law enforcement services on all SDSU campuses, including the Brawley Center. To address jurisdiction for those police matters occurring on campus property, SDSU and the Imperial County Sheriff's Department have entered into an MOU to identify the procedures for SDSU's UPD and the Imperial County Sheriff's Department to provide appropriate responses to incidences occurring on the Brawley Center property. (Because the Brawley Center is located outside the Brawley City limits, the Imperial County Sheriff's Department is the applicable law enforcement agency.) Under the MOU, SDSU UPD is the primary reporting and investigating agency for crimes occurring on campus property, whether or not the victims or suspects are affiliated with SDSU; excepted from these duties are homicides and officer-involved shootings, in which case the Sheriff's Department takes the lead. Under the MOU, both agencies provide mutual aid assistance when requested (see Appendix J).

The proposed project consists of the construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan and previously analyzed in the certified EIR. As described in Section 3.14 of this IS, the proposed project would serve and support the previously approved 850 FTE students, as well as four new faculty members; as such, the project would not increase student enrollment above prior approved levels. The proposed project would not substantially increase the demand for police services beyond that considered in the prior EIR such that the project would require the provision of or need for new or physically altered police protection facilities; therefore, impacts would be **less than significant**.

Schools?

The IS prepared for the previously certified EIR determined that buildout of the Brawley Center would provide educational facilities and would not result in an increased demand for schools within the City. As a result, no impact would occur.

The Brawley Center, including the site of the proposed project, is located within the Brawley Elementary School District and Brawley Middle School District (BESD 2023). The proposed project would involve the construction and operation of a new sciences building within the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan and previously analyzed in the certified EIR. The proposed project would result in the addition of four new faculty/staff members and would serve and support the previously approved 850 FTE students and, as such, would not increase student enrollment above prior approved levels. Even assuming the four new additional staff members had families with children that would attend the local schools, the limited number of additional students would not result in a substantial increase in school attendance resulting in the need for new or physically altered school/educational facilities; therefore, impacts would be **less than significant**.

Parks?

The IS prepared for the previously certified EIR determined that buildout of the Brawley Center would provide additional parkland and no impacts related to the provision of or need for new or physically altered park facilities would occur.

The City of Brawley has 20 parks and recreational facilities (City of Brawley 2022). The closest park to the project site is Alyce Geraux Park, which is located approximately 1.8 miles northwest of the project site. The proposed project would involve the construction and operation of a new sciences building generally within

the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan and previously analyzed in the certified EIR. The proposed project would result in four additional faculty/staff members and would serve and support the previously approved 850 FTE students and, as such, would not increase student enrollment above prior approved levels. The small number of new faculty/staff would not substantially increase the demand on parks within the City resulting in a need for new or physically altered park facilities; therefore, impacts would be **less than significant**.

Other public facilities?

The IS prepared for the previously certified EIR determined that students introduced to the area would not result in an increased demand for library facilities and no impact would occur.

The Brawley Public Library serves the City and the surrounding area and is located approximately 2.75 miles west of the project site. The proposed project would involve the construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the previously approved Brawley Center Master Plan and previously analyzed in the certified EIR. The proposed project would result in the addition of four new faculty/staff members and would serve and support the previously approved 850 FTE students; as such, it would not increase student enrollment above prior approved levels. The small number of new faculty/staff would not substantially increase the demand on public library services within the City requiring the provision of new or physically altered library facilities; therefore, impacts would be **less than significant**.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

The IS prepared for the 2003 EIR determined that students introduced to the area as a result of buildout of the approved Brawley Center Master Plan would not increase demand on existing recreational facilities and no impact would occur.

As described in Section 3.15, Public Services, of this IS, the City of Brawley has 20 parks and recreational facilities (City of Brawley 2022). The nearest park to the project site is Alyce Geraux Park, located approximately 1.8 miles northeast of the project site. Imperial County has 8 County parks and recreational facilities (Imperial County CED 2023). The nearest County park is Wiest Lake Park, located at 5351 Dietrich Road in Brawley, and is approximately 4.5 miles north of the project site. The proposed project would involve the construction and operation of a new sciences building generally within the footprint of Building 102, as identified in the approved Brawley Center Master Plan and previously analyzed in the certified EIR. As discussed in Section 3.14 of this IS, in addition to four new faculty/staff members, the project would result in a less-than-significant impact related to population increase because the project would serve and support the previously approved 850 FTE students; as such, the project would not increase student enrollment above prior approved levels. In light of the limited number of new faculty/staff members that would serve the new building, the proposed project would not substantially increase demand on parks within the City or County such that substantial physical deterioration of existing facilities would occur or be accelerated. As such, this impact would be **less than significant**.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

The IS prepared for the previously certified EIR determined that buildout of the Brawley Center would include recreational facilities to accommodate users in addition to users in the surrounding area. Because there would be no additional increase in recreational demand such that construction or expansion of recreational facilities would be required, the EIR determined that no impact would occur.

As described above, the proposed project would involve the construction and operation of a single new sciences building generally located within the footprint of Building 102, as identified in the approved Brawley Center Master Plan and previously analyzed in the certified EIR; thus, the project does not propose buildout of the previously approved Brawley Center Master Plan in its entirety. The proposed project includes the addition of four new faculty staff members and would serve and support the previously approved 850 FTE students; as such, it would not increase student enrollment above prior approved levels. The proposed project does not include the construction or expansion of recreational facilities, nor would it require the construction or expansion of recreational facilities as a result of increased recreational users such that a physical effect on the environment would occur. As such, impacts would be **less than significant**.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis presented below addresses the potential project-specific transportation related impacts associated with construction and development of the proposed sciences building. The previously certified EIR analyzed the potential traffic impacts associated with development of the current approved Brawley Center Master Plan at a program level of review. As previously noted, that analysis considered the potential impacts associated with a student enrollment of 850 FTE students. Because the proposed project would not increase student enrollment beyond the number analyzed in the 2003 EIR and related technical report, no further analyses of vehicle trips that would be generated by the student body or faculty/staff is necessary or required.

a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The proposed project would be constructed and developed substantially consistent with the previously approved 2003 Brawley Center Master Plan, which is the governing document regulating development at Brawley Center. The project would be built generally on the site of Building 102, as designated on the approved Brawley Center Master Plan. The proposed project does not include any improvements to the circulation system, including transit, roadway, bicycle, or pedestrian facilities, outside the Brawley Center boundaries. Any transportation-related improvements constructed as part of the proposed project would be constructed on site and would be consistent with the Brawley Center Master Plan and any applicable CSU policies. Accordingly, impacts related to this criterion would be **less than significant**.

b) *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3(b) provides the criteria for analyzing transportation impacts based on a VMT metric. Generally, the section provides that VMT exceeding an applicable threshold of significance may indicate a significant impact requiring mitigation. Projects that decrease VMT in the project area compared to existing conditions are presumed to have a less than significant transportation impact. Additionally, if existing models or methods are not available to estimate the VMT for a particular project, a lead agency may analyze the project's VMT qualitatively, taking into account such factors as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT.

Construction Traffic

In terms of construction traffic, construction of the proposed project would entail 7,500 CY of fill that would be cut at the Brawley Center and then reused on the project site. Because the cut and fill process would be balanced on site, there would be no import or export related vehicle trips and no VMT generated in connection with this process. As to vehicle trips generated by material deliveries, worker trips, etc., based on the relatively small building to be constructed (approximately 37,000 sf), it was determined that construction-related trips would generate a nominal amount of vehicle trips and associated VMT. Moreover, VMT associated with heavy-duty truck trips (as opposed to light-duty and passenger vehicle trips) is not to be considered as part of the CEQA VMT analysis as the CEQA Guidelines specifically exempted these type trips and related miles traveled from analysis. For these reasons, impacts related to construction-related vehicle trips would be **less than significant**.

Operational Traffic

As to those vehicle trips that would be generated in connection with operation of the sciences building, as previously explained, vehicle trips associated with a student enrollment of 850 FTE were previously analyzed as part of the 2003 certified EIR, with appropriate mitigation recommended and implemented. As the proposed project would not increase, or result in an increase above, the previously approved enrollment, there would be no additional vehicle trips associated with the operation of the Project; therefore, no further analysis under CEQA is required.

VMT calculations consider trip length as well as trip generation. The presence of the SDSU center in Brawley allows college students who live in Brawley or elsewhere in Imperial County to drive a shorter distance to school than if they attended another university. For instance, a student living in downtown Brawley would need to drive 6 miles one-way to the Brawley Center. However, in the absence of the Brawley Center and related higher education opportunities, if that same student were to attend, for example, SDSU or UC Riverside, the student would need to travel a much greater distance, thereby generating substantially more VMT.

For comparative purposes, the distances to other comparable campuses are provided below:

▪ Brawley to SDSU	120 miles
▪ Brawley to UC Riverside	160 miles
▪ Brawley to CSU San Bernardino	150 miles

Due to the far greater distances to travel to other universities, it is reasonable to conclude that the proposed project would result in reduced trip lengths and therefore reduced VMT, compared to students traveling to other campuses.

Thus, the availability of the sciences facility is analogous to opening a neighborhood Starbucks or other local serving retail establishment. Such establishments are presumed under VMT analyses to shorten trips and reduce areawide VMT because their patrons no longer need to travel to more distant locations (OPR 2018, p. 16). For the same reasons, the proposed project would have an overall positive effect (i.e., reduction) on VMT.

- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The proposed project would not increase transportation/geometric hazards, because all project traffic would use the existing access driveway, which is built to California Department of Transportation (Caltrans) standards. Any internal roads that would be built as part of the project would be designed to applicable standards and as such would not include sharp curves or dangerous intersections. Additionally, the project does not include incompatible uses that would require the use of corresponding equipment incompatible with existing vehicular traffic, such as farm equipment. For these reasons, impacts related to hazards would be **less than significant**.

- d) *Would the project result in inadequate emergency access?*

Under the proposed project, emergency access would be provided, as it currently is, via the Brawley Center access point to SR 78. Because this access is built to Caltrans standards and the proposed project would not alter the existing access, adequate emergency access would be maintained. As such, impacts related to emergency access would be **less than significant**.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?***

and

- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

On July 1, 2015, AB 52 went into effect, requiring a lead agency to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project. The EIR was certified in 2003, prior to AB 52 going into effect, therefore, the SDSU Imperial Valley Campus Master Plan Project was not subject to the requirements of AB 52. However, a cultural resources identification study was completed for the project in compliance with CEQA, and no historic or prehistoric cultural resources were identified within the project APE based on the records and literature research and site survey, and the NAHC Sacred Lands File did not indicate the presence of Native American cultural resources in the immediate project area.

Dudek's cultural resources inventory of the project site included a records search from the SCIC, archival research, NAHC outreach, and a pedestrian survey. The SCIC records search did not identify any cultural resources within the project area and the pedestrian survey did not identify any cultural resources within the project area.

A search of the NAHC SLF was conducted and the NAHC replied on December 27, 2022, with results indicating the potential presence of relevant resources within the geographic area. The NAHC additionally provided a list of Native American Tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area. Outreach letters were mailed on February 21, 2023, to all Native American group representatives included on the NAHC contact list. These letters sought to solicit additional information relating to Native American resources that may be impacted by construction and development of the project. Three responses have been received to date and no TCRs have been identified within the project area.

In compliance with AB 52, CSU/SDSU, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities. In accordance with the law's requirements, SDSU mailed AB 52 notification letters to all tribes NAHC recommended tribes on March 14, 2023. In response, one letter was received from the Sycuan Band of the Kumeyaay Nation. The Sycuan Band requested: to consult on the project; the records for sacred land sites within a one-mile buffer; any known archaeological site records within a one-mile buffer; and, the cultural and environmental studies/report prepared for the project area. The Sycuan Band also recommended SDSU contact other Kumeyaay Tribes such as Viejas,

Barona, Campo, Manzanita, La Posta, and Jamul; each of these Tribes was included in the AB 52 notification mailing.

In addition to the AB 52 letters, SDSU also sent out an initial mailing to all NAHC recommended tribes describing the proposed project and seeking any input relative to tribal cultural resources. In response to that mailing, the San Pasqual Band of Mission Indians requested consultation on the project.

In response to the two consultation requests, a meeting between representatives of CSU/SDSU and the San Pasqual Band of Mission Indians was held on July 31, 2023 and a meeting with the Sycuan Band of the Kumeyaay Indians was held on August 4, 2023. During the AB 52 consultation meetings with both tribes, no tribal cultural resources were identified by either tribe within the project area. However, at the request of both tribes, SDSU will provide for rotating cultural resources monitoring by a representative of the two tribes during project construction activities.

Mitigation measure CUL-2, presented below, would reduce potentially significant impacts to a **less-than-significant** level by requiring cultural resources monitoring during construction.

CUL-2: Although the potential for discovery of tribal cultural resources on the project site is considered low, in response to requests made during AB 52 consultation meetings, CSU/SDSU shall authorize tribal monitoring of such resources during project construction grading activities and shall provide appropriate remuneration for such monitoring consistent with standard practices. SDSU retains the authority to select the monitor, which shall be provided by either the Sycuan Band of the Kumeyaay Nation or the San Pasqual Band of Mission Indians. Such monitoring by a single tribal monitor shall be authorized on a daily basis during project construction grading activities; however, in the event a monitor is not available on any given day, project construction activities may continue uninterrupted. In the event tribal cultural resources are inadvertently encountered during project construction activities, work in the immediate area must stop and a qualified archaeologist meeting the Secretary of the Interior's Professional Standards shall assess the discovery in consultation with the Sycuan Band of the Kumeyaay Nation and the San Pasqual Band of Mission Indians to evaluate the resource and develop a plan for treatment and disposition of the resource. If avoidance is not feasible, additional work such as data recovery may be warranted. Following evaluation by a qualified archaeologist, in consultation with the Sycuan Band of the Kumeyaay Nation, the San Pasqual Band of Mission Indians, and CSU/SDSU, construction shall be permitted to resume.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Impacts related to the relocation or construction of new or expanded water, wastewater treatment, electric power, natural gas, and telecommunications facilities were evaluated in Section 3.7, Public Services/Utilities, of the 2003 EIR. Impacts related to new stormwater drainage facilities were evaluated in Section 3.8, Hydrology, and Section 3.11, Water Quality, of the 2003 EIR. The 2003 EIR determined that new or expanded wastewater, storm drain, and electric power facilities required for buildout of the Brawley Center Master Plan could result in potentially significant environmental effects. The CSU Board of Trustees adopted mitigation measures to ensure coordination between SDSU, the City of Brawley, IID, and other affected agencies (as appropriate) on issues such as anticipated drainage changes and electric power demand, as well as necessary relocations, upgrades, extensions, and/or undergrounding of required utility

infrastructure (see SDSU 2003, pp. 11-3 and 11-4). With incorporation of identified mitigation measures, impacts related to new or expanded wastewater, storm drain, and electric power facilities were determined to be less than significant. The 2003 EIR determined that buildout of the approved Brawley Center Master Plan would have a less-than-significant impact related to new or expanded water facilities, and no impact related to natural gas or telecommunication facilities. Thus, no new or expanded off-site water facilities would be required to serve the project.

As discussed in further detail below, the proposed project would require new points of connection for water, wastewater, electric power, and telecommunications from existing or planned utility lines/facilities to serve the new building. The project would also require new stormwater infrastructure, including on-site bio-retention/filtration features, which would connect to existing or planned off-site systems. No natural gas usage is proposed at the project site. Analysis of the potential impacts associated with the related infrastructure improvements is provided below.

Water

The site of the proposed project is located within the City's SOI, and potable water is currently provided to the project site by the City of Brawley's Department of Public Works.. Consistent with the analysis provided in the 2003 EIR, the proposed project would require new on-site water infrastructure, such as water mains and laterals, which would connect to existing or planned off-site municipal infrastructure in coordination with the City's Department of Public Works. Installation of new water mains and laterals would consist of either trenching to the depth of pipe placement or the use of different trenchless technologies, which cause substantially less ground disturbance. Trenching results in a temporary stockpiling of soil along the length of the trench, pending backfilling, which could result in potential short-term soil erosion. In accordance with the Construction General Permit, a SWPPP would be implemented for the project. The SWPPP would outline BMPs for protecting stormwater runoff from sediment and erosion. Additionally, the project would be required to comply with Regulation VIII, Fugitive Dust Control Measures, of Imperial County Air Pollution Control District's (ICAPCD's) Rules and Regulations, requiring use of water, tarps, or other suitable material (such as vegetative ground cover) during construction, which would reduce fugitive dust and potential soil erosion associated with construction activities.

In 2018, the City and the Imperial County Local Agency Formation Commission prepared a Service Area Plan, which demonstrates the City's intent and ability to provide adequate services within the SOI boundaries (City of Brawley and Imperial County LAFCo 2018). According to the Service Area Plan, the City will continue to assure adequate funding for the implementation of new water projects and the maintenance of existing water conveyance and treatment facilities, as well as require that system improvements conducted by the City or private developers be designed to conform to relevant federal, state, and local regulations.

Thus, while the City of Brawley's planned water facility extensions or upgrades may be used to service the project, the project itself would not involve construction of new or expanded off-site water facilities.

For the reasons discussed above, the project would have a **less-than-significant** impact related to the relocation or construction of new or expanded water facilities.

Wastewater

The City provides wastewater collection, treatment, and disposal services for the City and areas within the City SOI, while the Department of Public Works plans, constructs, and maintains the sewage system, which includes a collection network of pipes and a wastewater treatment plant (City of Brawley and Imperial County LAFCo 2012). The project would require new wastewater infrastructure, which would connect to existing infrastructure in coordination with the City/Department of Public Works. New wastewater connections associated with project implementation would be consistent with the analysis provided in the 2003 EIR, which states that implementation of the Brawley Center Master Plan would require the extension of wastewater facilities. According to the 2003 EIR, the City has agreed to provide the extension of sewer services, including sewer lines and treatment capacity, for the Brawley Center.

Similar to installation of new or extended water lines (discussed above), installation of new or extended sewer lines would consist of either trenching to the depth of pipe placement or the use of different trenchless technologies, which cause substantially less ground disturbance. As described in Section 3.7, Geology and Soils, of this IS, in accordance with the Construction General Permit, a SWPPP would be implemented outlining BMPs for sediment and erosion related to water runoff. Additionally, the project would be required to comply with Regulation VIII of ICAPCD's Rules and Regulations, which would reduce fugitive dust and potential soil erosion associated with construction activities.

Regarding treatment capacity, based on forecasted water demand, described above, the proposed project's wastewater generation is estimated to be approximately 0.07 million gallons per day of wastewater, which is well within the anticipated wastewater generation for buildout of the Brawley Center Master Plan (0.6 million gallons per day), as identified in the 2003 EIR.

According to the City's 2020 Urban Water Management Plan, the City's wastewater treatment plant serving the project area treats an average daily flow of 2.84 million gallons per day and a peak daily flow of 6.33 million gallons per day. The treatment capacity of the plant is 16 million gallons per day, which allows for a remaining treatment capacity of 9.67 million gallons per day during peak flow (City of Brawley 2021). Based on anticipated water demand, the proposed project's wastewater generation is estimated to be approximately 0.07 million gallons per day of wastewater, or 0.72% of remaining peak flow capacity. Therefore, there is adequate, existing wastewater treatment infrastructure to serve the project, and project implementation would not result or require construction of new or expanded wastewater treatment facilities off site. Further, the project would also implement mitigation measures previously identified in the 2003 EIR (see SDSU 2003, p. 11-4) requiring separate storm drains and sanitary sewers for project facilities to ensure that storm runoff from the project will not increase the frequency or volume of wastewater treatment plant overflows.

Therefore, the project would have a **less-than-significant** impact related to the relocation or construction of new or expanded wastewater facilities, and no additional mitigation is required.

Stormwater Drainage

Following project construction, the impervious areas of the site would increase, resulting in a potential for stormwater runoff volumes and/or stormwater runoff rates to increase. As discussed in Section 3.10, Hydrology and Water Quality, of this IS, the project would require new stormwater infrastructure (including

on-site bio-retention/filtration features), which would connect to the existing or planned City and/or IID systems. The inclusion of proposed bio-retention features and landscaping would reduce on-site runoff such that the project would not create or contribute excess runoff water that would exceed the capacity of existing or planned stormwater drainage systems. The project would also implement mitigation measures identified in the 2003 EIR requiring separate storm drains and sanitary sewers for project facilities, as well as coordination with IID and other affected agencies (see SDSU 2003, p. 11-4). Therefore, existing or planned off-site systems would be adequate to serve the project, and no additional off-site construction associated with new or expanded stormwater drainage facilities would be required.

Regarding stormwater drainage improvements on the project site, similar to the discussion above for construction of water and wastewater infrastructure, construction of the on-site stormwater infrastructure would be completed in accordance with the Construction General Permit. A SWPPP, which includes BMPs for stormwater runoff, sediment, and erosion control, would be implemented as part of the Construction General Permit. Additionally, the project would be required to comply with Regulation VIII of ICAPCD's Rules and Regulations, which would reduce fugitive dust and potential soil erosion associated with construction of storm water drainage improvements.

For the reasons discussed above, the project would have a **less-than-significant** impact related to the relocation or construction of new or expanded stormwater facilities, and no additional mitigation is required.

Electric Power

Electrical services within the project area are provided by IID in coordination with the City. New utility connections and infrastructure would be required to support electrical services for the proposed project. Additionally, the project would include a diesel-operated backup generator and would introduce 54 kW of on-site solar. As stated in the 2003 EIR, IID anticipates the need for additional production facilities to meet the demand associated with buildout of the Brawley Center Master Plan. Specifically, IID planners have identified a need for at least one substation to be located on the Brawley Center. The substation would be considered a separate planned project, which would be implemented in accordance with mitigation measures identified in the 2003 EIR (SDSU 2003, pp. 11-3 and 11-4, 3.7 Public Services/Utilities Mitigation Measure; see above, which states that "SDSU shall dedicate an easement for development of an electrical substation on an on-site location identified by SDSU and satisfactory to the IID"). Per the City of Brawley 2030 General Plan (e.g., Infrastructure Element Goal 14) and the 2012 Service Area Plan, the City will ensure that adequate power and transmission infrastructure is provided to serve existing and planned development in the SOI, including the proposed project (City of Brawley 2008; City of Brawley and Imperial County LAFCo 2012). As such, the proposed project would be consistent with the analysis provided in the 2003 EIR. Furthermore, the project would implement electric power facility mitigation identified in the 2003 EIR (SDSU 2003, pp. 11-3 and 11-4, 3.7 Public Services/Utilities Mitigation Measure), which requires coordination with IID on infrastructure, including load increase, relocations, upgrades, undergrounding, line extensions, conduits, vaults, pads, switches, and regulation charges.

Connections to on-site electrical power infrastructure would require soils excavation and recompaction. However, similar to the discussion above for construction of water, wastewater, and stormwater infrastructure, construction work and related soil disturbances associated with establishing the connections to on-site electrical infrastructure would be temporary and would be completed in accordance with the Construction General Permit. A SWPPP, which includes BMPs for stormwater runoff, sediment, and

erosion control, would be implemented as part of the Construction General Permit. Additionally, the project would be required to comply with Regulation VIII of ICAPCD's Rules and Regulations, which would reduce associated fugitive dust and potential soil erosion during construction. No other new or expanded infrastructure would be required. Therefore, the proposed project would have a **less-than-significant** impact related to the relocation or construction of new or expanded electric power facilities, and no additional mitigation is required.

Telecommunication

As discussed in the 2003 EIR, a telephone company is a publicly regulated utility and is obligated to serve the community and improve telecommunication facilities as needed. For internet services, the project site is within the service area of Spectrum, AT&T and T-Mobile. Any facility upgrades or line extensions that may be necessary to facilitate the proposed project would be undertaken on site or within the public right-of-way. Similar to that described above for construction of water, wastewater, stormwater, and electrical infrastructure, installation of telecommunication infrastructure would be completed in accordance with the Construction General Permit. SWPPP BMPs include measures for stormwater runoff, sediment, and erosion control protection during construction activities. Additionally, the project would be required to comply with Regulation VIII of ICAPCD's Rules and Regulations, which would reduce associated fugitive dust and potential soil erosion during construction. No other new or expanded infrastructure would be required. As such, potential impacts associated with the construction or relocation of necessary telecommunication infrastructure to serve the proposed project would be **less than significant**.

b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Impacts related to water supply were addressed in Section 3.7, Public Services/Utilities, of the 2003 EIR. The City purchases raw imported water from the IID, which then delivers the water to the City via IID-owned and operated canals. As stated in the 2003 EIR, projected water capacity requirements would not exceed planned maximum treatment plant capacity, and the City agreed to provide the extension of water services, as needed, to meet demand associated with buildout of the Brawley Center Master Plan. Therefore, impacts were determined to be less than significant. A project-specific analysis of water supply availability during normal, dry, and multiple dry years is provided below.

Potable water is currently provided to the project site by the City of Brawley as the Brawley Center is located within the City's SOI. The proposed project's water demand would be approximately 74,400 gallons of water per day (83.3 AFY), which is well within the anticipated demand for buildout of the Brawley Center Master Plan (700,000 gallons per day), as identified in the 2003 EIR. The City of Brawley 2020 Urban Water Management Plan projected an average water use over the next 20 years during normal, dry and multiple dry years (City of Brawley 2021). The total demand through 2045 was calculated using the urban water targets and population growth estimates for the City, including the City SOI, which includes the Brawley Center. The City is able to provide 16,800 AFY of water; therefore, the proposed project water demand of 83.3 AFY would represent a nominal fraction (approximately 0.5%) of the annual water supply. The Urban Water Management Plan forecasts no water supply shortage in the future during normal, dry, and multiple dry years (City of Brawley 2021).

As discussed in the 2003 EIR, due to changes in the state and federal Safe Drinking Water Acts, constraints were initially placed upon IID's non-agricultural water uses. However, in response to projected increases in water demand, the IID board adopted the Interim Water Supply Policy for Non-Agricultural Projects on September 29, 2009, to ensure that sufficient water will be available for new non-agricultural development within the IID service area (IID 2022). The policy designates up to 25,000 acre-feet of IID's annual Colorado River water supply for new projects, provides a mechanism and process to develop a water supply contract/agreement for any appropriately permitted project, and establishes the framework to meet water supply demands without any adverse impacts to current users while establishing fees to ensure funding for water conservation or augmentation projects (IID 2022). The project's anticipated demand of 83.3 AFY represents a minimal amount (approximately 0.33%) of the IID's annual supply designated for new projects in the service area (which includes the project site). Finally, the project would comply with minimum mandatory standards pertaining to the planning and design of sustainable site development and water conservation set forth in the most recent CALGreen.

For these reasons, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. This impact would be **less than significant**.

- c) *Would the project result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The IS prepared for the 2003 EIR determined that there would be adequate wastewater treatment capacity to accommodate demand associated with buildout of the Brawley Center Master Plan (in addition to the existing commitments). Impacts were determined to be less than significant.

As discussed in Section 3.19(a), the City of Brawley would provide wastewater treatment services for the project. The maximum daily volume of the treatment plant is 5.9 million gallons per day, which allows for a remaining treatment capacity of 3.14 million gallons per day during peak flow (City of Brawley and Imperial County LAFCo 2012). Based on forecasted water demand, the proposed project's wastewater generation is estimated to be approximately 0.07 million gallons per day of wastewater, or 2.2% of remaining treatment capacity during peak flow days. The project would also comply with mitigation measures identified in the 2003 EIR (discussed above) which require separate storm drain and sanitary sewer facilities to ensure that the project would not increase the frequency or volume of flows processed by the wastewater treatment plant (see SDSU 2003, p. 11-4). Therefore, the City (i.e., the wastewater treatment provider for the proposed project) would have adequate capacity to serve the project's projected wastewater treatment demand, in addition to the provider's existing commitments. Impacts would be **less than significant**, and no additional mitigation is required.

- d) *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Impacts related to solid waste collection and disposal associated with buildout of the Brawley Center Master Plan were evaluated in Section 3.7, Public Services/Utilities, of the 2003 EIR. According to the 2003 EIR, the Brawley landfill site would adequately provide disposal service for the projected volume of solid waste

generated at the Brawley Center, while construction waste would be diverted to either the Imperial landfill site or the Niland landfill site. Impacts were determined to be less than significant.

The nearest active solid waste facility to the project site is the Imperial Landfill and Imperial Landfill CDI (construction/demolition and inert debris) Facility, located approximately 9 miles southwest of the Brawley Center. The Imperial Landfill CDI Facility accepts inert and construction/demolition waste and has a permitted capacity of 100 tons per day (15,600 tons per year) (CalRecycle 2019a).

The Imperial Landfill accepts a variety of waste, including municipal waste, and has a permitted capacity of 1,700 tons per day, a remaining capacity of 12,384,000 tons, and a maximum permitted capacity of 19,514,700 tons through 2040 (CalRecycle 2019b). The proposed project would generate approximately 155 tons of solid waste per year (Dudek 2023; Appendix B). Therefore, the daily waste generated once the project is operational would represent approximately 0.4% of the Imperial Landfill CDI Facility's daily capacity and 0.02% of Imperial Landfill's daily capacity. Annual waste generated by the project after buildout would represent 0.001% of the Imperial Landfill's remaining capacity and 0.0007% of Imperial Landfill's maximum permitted capacity. As a result, the Imperial Landfill CDI Facility and Imperial Landfill have adequate capacity to serve solid waste generated by both construction and operation of the proposed project. Further, in accordance with CALGreen Section 5.408, a Construction Waste Management Plan for recycling and/or salvaging would be implemented for reuse of a minimum of 65% of nonhazardous construction and demolition debris generated during project construction. Because implementation of the project would be adequately served by existing solid waste facilities and would not otherwise impair attainment of solid waste reduction goals, impacts would be **less than significant**.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The IS prepared for the 2003 EIR determined that buildout of the Brawley Center Master Plan would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. As such, impacts were determined to be less than significant.

Landfill facilities serving the project are regulated under federal, state, and local laws. For example, the California Department of Resources Recycling and Recovery, the Regional Water Quality Control Board, the local Air Pollution Control District, and the Local Enforcement Agencies all perform inspections of waste management facilities to ensure that they are being operated in compliance with applicable federal, state, and local regulations (Imperial County 2023c). Additionally, waste management operators, agencies, and property owners are required to comply with applicable solid waste reduction and diversion requirements set forth in AB 75, AB 939, AB 341, AB 1327, AB 1374, and AB 1826. Solid waste disposal following project buildout would also be completed in compliance with CALGreen, as described above, which sets forth recycling requirements for construction and demolition projects. For non-residential construction projects, 65% of the debris generated (by weight) must be recycled. Because CSU/SDSU is required to comply with federal, state, and local management and reduction statutes and regulations related to the disposal of solid waste once the proposed project is operational, this impact would be **less than significant**.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impacts related to wildfire were introduced as part of the CEQA Guidelines Appendix G in 2019. As such, the wildfire thresholds described in Appendix G were not previously evaluated in the 2003 EIR or IS.

As described in Section 4.1.7, Fire Hazards, applicable mapping of the project site shows that the site is not located within a state responsibility area or a very high fire hazard severity zone (CAL FIRE 2007; the 2007 mapping is the current mapping). The nearest mapped fire hazard severity zones are located approximately 30 miles southwest and 45 miles northwest of the project site. Additionally, because the project site is located within the City of Brawley's SOI, mutual aid agreements between the City and Imperial County have been entered into to ensure that adequate fire protection and services are provided to the project site by the City Fire Department.

Because the project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, it is not necessary to address the other inquiries presented in Appendix G. However, for information purposes, the following additional information is provided.

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

As described above, the project does not propose any closures of SR-78 nor any modifications to existing emergency access or evacuation routes and, therefore, would not substantially impair an adopted emergency response plan or emergency evacuation plan. **No impact** would occur.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Because the site is not located in or near an area presenting wildfire hazard conditions, the project is not anticipated to exacerbate wildfire risk and therefore result in exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Furthermore, construction and operation of the project would comply with all required building, fire, and safety code standards (e.g., Titles 19 and 24 of the California Code of Regulations and the California Health and Safety Code). As such, the project is not expected to exacerbate any wildfire risks, which may expose on-site occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. **No impact** would occur.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project would not involve installation or maintenance of infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. **No impact** would occur.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project and larger Brawley Center is located on a relatively flat site with no known previous fire events. As a result, the potential to expose people or structure to significant risk associated with post-fire conditions such as downslope or downstream flooding or landslides is not anticipated. **No impact** would occur.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***

The IS prepared for the 2003 EIR determined that development areas associated with buildout of the Brawley Center Master Plan did not contain rare or endangered plant or animal habitat and thus, implementation of the Brawley Center Master Plan would not significantly reduce populations of those species. Similarly, the IS determined that there were no known cultural resources within the project area and, therefore, such resources would not be directly impacted through implementation of the Brawley Center Master Plan. Impacts were determined to be less than significant.

As discussed in Section 3.4, Biological Resources, of this IS, in addition to biological resource mitigation measures identified in the 2003 EIR (SDSU 2003, p. 11-2), the proposed project would include additional

mitigation measures to reduce or avoid potentially significant impacts to nesting migratory birds, burrowing owls, and aquatic resources (see **BIO-1**, **BIO-2**, and **BIO-3**, respectively, in Section 3.4 of this IS). Further, in addition to Cultural Resources mitigation measures identified in the 2003 EIR (SDSU 2003, pp. 11-2 through 11-3), the proposed project would require the implementation of mitigation measure **CUL-1**, which would reduce or avoid potentially significant construction impacts associated with the inadvertent discovery of important cultural artifacts and/or human remains (see **CUL-1** in Section 3.5, Cultural Resources, of this IS). The proposed project would also require implementation of mitigation measure **CUL-2** in order to reduce or avoid potentially significant construction impacts associated with the discovery of tribal cultural resources. Lastly, the potential for unknown paleontological resources would be addressed through implementation of mitigation measure **GEO-1**, discussed in Section 3.7, Geology and Soils, of this IS/MND. With implementation of these additional mitigation measures (i.e., **BIO-1**, **BIO-2**, **BIO-3**, **CUL-1**, **CUL-2** and **GEO-1**), the proposed project's potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory, would be **less than significant with mitigation incorporated**.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

The IS prepared for the 2003 EIR determined that buildout of the Brawley Center Master Plan would have no cumulatively considerable impacts.

The proposed project would involve the construction and operation of a new sciences building to be located generally within the footprint of Building 102, as identified in the approved Brawley Center Master Plan and previously analyzed in the certified 2003 EIR. As described in Section 3.14 of this IS, implementation of the project would not increase FTE student enrollment above prior approved levels. Furthermore, as presented throughout this IS, the proposed project would result in less-than-significant impacts or impacts that would be mitigated to less-than-significant levels.⁴ The proposed project would implement all applicable mitigation measures identified in the 2003 EIR, as well as additional, project-specific mitigation to reduce or avoid potential impacts to nesting birds, burrowing owls, aquatic resources (see **BIO-1**, **BIO-2**, and **BIO-3**, respectively, in Section 3.4), cultural resources (see **CUL-1** in Section 3.5), tribal cultural resources (see **CUL-2** in Section 3.18), and paleontological resources (see **GEO-1** in Section 3.7). Finally, all development projects in the City and SOI are guided by the policies identified in the City's General Plan and by the regulations established in the City's Municipal Code. Compliance with applicable land use and environmental regulations would help ensure that environmental effects associated with the proposed project do not combine with effects from reasonably foreseeable future development in the City or the City's SOI to cause cumulatively considerable significant impacts. For these reasons, impacts would be **less than significant with mitigation incorporated**.

⁴ The 2003 EIR identified mitigation measures applicable to land use and planning, geology/soils, hazardous materials/public safety, biological resources, cultural resources, traffic, public services/utilities, hydrology, agricultural lands, and water quality (see pages 11-1 through 11-4 of the 2003 EIR).

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

The IS prepared for the 2003 EIR determined that because buildout of the Brawley Center Master Plan would not result in environmental effects that would cause substantial adverse effects on human beings, no impact would occur.

As evaluated throughout this IS/MND, with the incorporation of mitigation measures identified in the 2003 EIR, as well as additional, project-specific mitigation measures to address potentially significant impacts to biological resources, cultural resources, and paleontological resources, environmental impacts associated with the proposed project would be reduced to a less-than-significant level. Therefore, with mitigation measures incorporated, the proposed project would not directly or indirectly cause substantial adverse effects on human beings, and impacts would be **less than significant with mitigation incorporated**.

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Appendix A

Aesthetics Technical Memorandum

Appendix B

AQ/GHG/Energy Technical Memorandum

Appendix C

Biological Resources Technical Memorandum

Appendix D

Cultural Resources Technical Memorandum

Appendix E

Geology and Soils Technical Memorandum

Appendix F

Paleontological Resources Technical Memorandum

Appendix G

Hazards and Hazardous Materials Technical Memorandum

Appendix H

Hydrology and Water Quality Technical Memorandum

Appendix I

Noise Technical Memorandum

Appendix J

SDSU City of Brawley MOU

Appendix K

Transportation Analysis