

**SDSU Imperial Valley Off-Campus Center – Calexico Affordable Student Housing  
Project**

**Mitigation Monitoring and Reporting Program**

(Pursuant to Public Resources Code Section 21081.6,  
And State CEQA Guidelines Section 15097)

Initial Study / Mitigated Negative Declaration (January 2025)  
(State Clearinghouse Number 2002051010)

Project Files May be Reviewed Online at:

<https://bfa.sdsu.edu/campus/facilities/planning/eir>

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## **I. INTRODUCTION**

This Mitigation Monitoring and Reporting Program (“MMRP”) has been prepared in conformance with the California Environmental Quality Act (“CEQA;” Pub. Resources Code, Section 21000 et seq.), and specifically Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines (Cal. Code Regs., tit. 14 Section 15000 et seq.). The MMRP establishes the framework that The Board of Trustees of the California State University/San Diego State University (the “CSU/SDSU”) and others will use to implement the mitigation measures adopted in connection with approval of the SDSU Imperial Valley Off-Campus Center Calexico Affordable Student Housing Project, and the monitoring/reporting of such implementation. “Monitoring” is generally an ongoing or periodic process of project oversight. “Reporting” generally consists of a written compliance review that is presented to the decision-making body or authorized staff person.

It is the intent of this MMRP to: (1) provide a framework to document implementation of the required mitigation; (2) identify monitoring/reporting responsibility; (3) establish the frequency and duration of monitoring/reporting; (4) provide a record of the monitoring/reporting; and (5) ensure compliance with those mitigation measures that are within the responsibility of the CSU/SDSU to implement. The CSU Board of Trustees (Board) has adopted feasible mitigation measures within its responsibility to implement as binding conditions of approval, and implementation of the measures is fully enforceable by the Board.

The following table lists each of the mitigation measures adopted by the Board in connection with approval of the SDSU Imperial Valley Off-Campus Center – Calexico Affordable Student Housing Project, the project phase and timing during which the measure is to be implemented, the person/agency responsible for implementing and monitoring implementation of the measure, the frequency of monitoring and reporting, and the status of compliance with the mitigation measure (MM).

The three mitigation measures specific to the Calexico Off Campus Center previously adopted and included in the *SDSU Imperial Valley Campus Master Plan Project Mitigation Monitoring Plan (2003)* are included in the table below. However, one of the previously adopted mitigation measures, MM-3.5-1, is superseded and replaced by mitigation measure, MM-TCR-1, currently adopted as part of the approval of the SDSU Imperial Valley Off-Campus Center Calexico Affordable Student Housing Project.

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Mitigation Measure No.	Mitigation Measures	Implementation Timing	Monitoring Frequency	Implementation Responsibility	Compliance
<b>Previously Adopted Measures from the SDSU Imperial Valley Campus Master Plan Project Mitigation Monitoring Plan (2003)</b>					
<b>Cultural Resources Mitigation Measure 3.5-1</b>	<p><b>MM-3.5-1:</b> It is recommended that if an initial finding within the project area where no known resources have been recorded is made, appropriate contact with the local Native American group per the Native American Heritage Commission will ensue, in accordance with the SDSU construction contract conditions, which state that: "If the Contractor discovers any artifacts during excavation and /or construction, the Contractor shall stop all affected work and notify the Trustees, who will call in a qualified archeologist designated by the California Archeological Inventory to assess the discovery and suggest further mitigation, as necessary. If the Contractor discovers human remains, the Contractor shall notify the Trustees, who will be responsible for contacting the county coroner and a qualified archeologist. If the remains are determined to be Native American, the Trustees shall contact the appropriate tribal representatives to oversee removal of the remains."</p> <p>If any buried cultural deposits are discovered during construction, development should be suspended, and the discovery protected and evaluated for its potential eligibility for listing on the National Register of Historic Places or the California Register of Historical Resources.</p> <p>(<b>Note:</b> Mitigation Measure TCR-1 listed below supersedes and replaces Cultural Resources Mitigation Measure 3.5-1, as identified in the previously adopted SDSU Imperial Valley Campus Master Plan Project Mitigation Monitoring Plan.)</p>	N/A (See <b>MM-TCR-1</b> )	N/A (See <b>MM-TCR-1</b> )	N/A (See <b>MM-TCR-1</b> )	
<b>Geology and Soils Mitigation Measure 3.2-1</b>	<p><b>MM-3.2-1:</b> Adverse discontinuities in strength between major structural elements shall be avoided.</p> <p>(<b>Note:</b> Since the 2003 SDSU Imperial Valley Campus Master Plan EIR was certified and the corresponding MMRP adopted, the CEQA Guidelines have been revised relative to geology and soils (per Appendix G of the 2022 CEQA Statute and Guidelines). As revised, seismic impacts on any given project are no longer considered potentially significant. For these</p>	Prior to detailed site planning a subsurface geotechnical and soils study shall be conducted.	Prior to detailed site planning.	The CSU/SDSU, or its designee.	

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	reasons, the mitigation measure adopted as part of the 2003 SDSU Imperial Valley Campus Master Plan EIR relative to potentially significant seismic impacts (Mitigation Measure 3.2-1) is not applicable to the proposed Project. Nonetheless, SDSU shall implement MM 3.2-1 to the extent applicable, including the preparation and adherence to recommendations of a geotechnical report.)				
<b>Geology and Soils Mitigation Measure 3.2-2</b>	<b>MM-3.2-2:</b> Prior to detailed site planning, a subsurface geotechnical and soils study shall be conducted to determine the shrink-swell potential and to develop design specific measures to ensure structural integrity. Grading and construction plans shall conform to recommendations of the study.	Prior to detailed site planning a subsurface geotechnical and soils study shall be conducted.	Prior to detailed site planning.	The CSU/SDSU, or its designee.	
<b>New SDSU Imperial Valley Off-Campus Center – Calexico Affordable Student Housing Project Mitigation Measures</b>					
<b>3.2 Air Quality</b>					
<b>MM-AQ-1</b>	<p><b>Construction Equipment Emissions Reductions.</b> Prior to the commencement of construction activities, the California State University/San Diego State University (the CSU/SDSU), or its designee, shall direct the construction contractor to demonstrate that all 75-horsepower or greater diesel-powered equipment is powered with Tier 4 Final engines certified by the California Air Resources Board and that all such equipment shall be used during Project construction.</p> <p>An exemption from this requirement may be granted if (1) the CSU/SDSU, or its designee, documents equipment with Tier 4 Final engines is not reasonably available and (2) the required corresponding reductions in criteria air pollutant emissions can be achieved for the Project from other combinations of construction equipment. Before an exemption may be granted, the CSU/SDSU, or its designee, shall (1) demonstrate that at least two construction fleet owners/operators in Imperial County were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within Imperial County during the desired construction schedule and (2) the proposed replacement equipment has been evaluated using the California</p>	Confirm construction contractor compliance or substantiate basis for exemption, if applicable, prior to commencement of construction activities.	Prior to the start of construction and ongoing during construction as new equipment is introduced.	The CSU/SDSU, or its designee.	

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	Emissions Estimator Model (CalEEMod), the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) and the Hotspots Analysis and Reporting Program (HARP2) or other industry standard emission estimation method and health risk assessment tools and documentation is provided to the CSU/SDSU to confirm that necessary Project-generated emissions and health risk reductions are achieved.				
<b>3.3 Biological Resources</b>					
<b>MM-BIO-1</b>	<p><b>Pre-Construction Nesting Bird and Bat Survey.</b> If ground disturbance and/or vegetation clearance activities are scheduled to occur during the avian nesting season (February 1-September-30) and bat reproduction season (April-September), the California State University/San Diego State University (the CSU/SDSU), or its designee, shall retain a biologist to conduct pre-construction nesting bird and bat surveys within the area to be disturbed and a 500-foot buffer. Surveys shall be conducted within 3 days prior to initiation of ground-disturbing activity between dawn and noon.</p> <p>If construction begins outside the nesting bird season (i.e., between October 1 and January 31), work may proceed without a nesting bird survey. If construction begins outside the nesting season, but crosses into the nesting season (e.g., starts in January and work continues into March), construction activities may proceed without a nesting bird survey. However, anytime construction activities pause for more than 72 hours during the nesting season, an updated nesting bird survey by a biologist shall be conducted prior to the resumption of construction activities.</p> <p>If an active nest or western mastiff bat roost is detected during the pre-construction survey, avoidance buffers shall be implemented as determined by a biologist retained by the CSU/SDSU. The buffer shall be of sufficient distance to ensure avoidance of adverse effects to the nesting bird or bat by</p>	Pre-construction nesting bird and bat surveys shall be conducted three days prior to initiation of ground-disturbing activity and within a 500-foot buffer of the impact area if construction is to occur during the nesting season (February 1 through September 30 and April through September). Or when construction activities pause for more than 72 hours during nesting season.	One time prior to construction if occurring during the nesting season, and if construction activities pause for more than 72 hours during nesting season.	The CSU/SDSU, or its designee.	

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	accounting for topography, ambient conditions, species, nest/roost 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. Any trees observed supporting roosting bats during the pre-construction survey shall not be removed during the bat reproduction period of April-September. Avoidance buffers shall be implemented as determined by a biologist retained by the CSU/SDSU.				
<b>3.18 Cultural and Tribal Cultural Resources</b>					
<b>MM-TCR-1</b>	<p><b>Tribal Monitoring.</b> 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, the California State University/San Diego State University (the CSU/SDSU) shall authorize tribal monitoring during Project construction grading activities and shall provide appropriate remuneration for such monitoring consistent with standard practices. The CSU/SDSU retains the authority to select the monitor, which shall be provided by the Campo 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.</p> <p>In the event tribal cultural resources are inadvertently encountered during construction activities, work in the immediate area shall stop and a qualified archaeologist meeting the Secretary of the Interior's Professional Standards shall assess the discovery in consultation with the Campo 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 Campo Band of Mission Indians and the CSU/SDSU, construction shall be permitted to resume.</p>	Tribal monitors shall be present during site disturbing construction activities.	As necessary during site disturbing project construction to ensure compliance.	The CSU/SDSU, or its designee.	

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	<p>If the CSU/SDSU, or its designee, discovers, human remains during construction of the Project, the CSU/SDSU, or its designee, shall contact the County Coroner and a qualified archaeologist in compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097. If the remains are determined to be Native American, CSU/SDSU shall contact the appropriate tribal representatives to oversee removal of the remains.</p> <p>The CSU/SDSU shall relinquish ownership of all tribal cultural resources unearthed during the tribal monitoring conducted during ground disturbing activities to the appropriate representative of the Campo Band of Mission Indians, as determined through the appropriate process, for respectful and dignified treatment and disposition, including reburial at a protected location on-site. All cultural materials that are associated with burial and/or funerary goods shall be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission, per California Public Resources Code Section 5097.98.</p> <p>(Note: Mitigation Measure TCR-1 supersedes and replaces Cultural Resources Mitigation Measure 3.5-1, as identified in the previously adopted 2003 SDSU Imperial Valley Campus Master Plan Project Mitigation Monitoring Plan.)</p>				
<b>3.7 Geology and Soils</b>					
<b>MM-GEO-1</b>	<p><b>Paleontological Resources.</b> Prior to commencement of any grading activity on site, the California State University/San Diego State University (the CSU/SDSU), or its designee, shall retain a qualified paleontologist consistent with the Society of Vertebrate Paleontology (SVP) (2010) guidelines, to prepare a Paleontological Resource Impact Mitigation Program (PRIMP) for the Project. The PRIMP shall be consistent with the SVP (2010) guidelines and outline the following requirements: worker attendance and environmental awareness training at pre-construction meeting/s; monitoring within the Project site as</p>	Prior to commencement of grading activities, and during preliminary ground disturbing and grading activities.	As necessary to ensure compliance.	The CSU/SDSU, or its designee.	



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	<p>necessary based on construction plans and/or geotechnical reports; procedures for discoveries and treatment; and methods (including sediment sampling for microvertebrate fossils), for reporting and collections management.</p> <p>A paleontologist shall attend a pre-construction meeting and shall be on site during the preliminary phase of construction during rough grading and other significant ground-disturbing activities (including augering) to monitor the discovery, if any, of previously undisturbed, fine-grained lake deposits. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the monitor shall temporarily halt and/or divert grading activity to allow recovery of any discovered paleontological resources. Once documentation and collection of the find is completed, the monitor shall allow grading to recommence in the area of the find. Any costs associated with laboratory processing of sediments and fossils, and curation fees are the responsibility of the CSU/SDSU.</p>				
<b>3.13 Noise</b>					
<b>MM-NOI-1</b>	<p><b>Temporary Construction Noise Barrier.</b> Prior to the commencement of construction activities, the California State University/San Diego State University, or its designee, shall direct the construction contractor to install a 6-foot-tall temporary construction noise barrier (either solid plywood or chain link fencing with sound blankets) along the southern and eastern Project boundaries to remain in place throughout the entire construction process.</p>	<p>Prior to the commencement of construction activities temporary noise barriers shall be constructed onsite.</p>	<p>Prior to and during construction.</p>	<p>The CSU/SDSU, or its designee.</p>	
<b>3.17 Transportation</b>					
<b>MM-TRA-1</b>	<p><b>Traffic Control Plan.</b> Prior to the commencement of construction activities, the California State University/San Diego State University, or its designee, shall prepare a traffic control plan, consistent with guidance available through the California Department of Transportation, to ensure the safe passage of pedestrians, motorists, and emergency vehicles in the immediate vicinity of construction activities. The traffic control</p>	<p>Prior to the commencement of construction activities, a traffic control plan shall be prepared.</p>	<p>Ongoing during construction.</p>	<p>The CSU/SDSU, or its designee.</p>	

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	plan shall be implemented during Project construction activities and shall be discontinued upon completion of Project construction.				