
Draft Initial Study/Proposed Mitigated Negative Declaration

San Diego State University
Imperial Valley Off-Campus Center - Calexico
Affordable Student
Housing Project
(SCH No. 2002051010)

DECEMBER 2024

Prepared for:

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- C Biological Resources Technical Memorandum
- D Cultural Resources and Tribal Cultural Resources Technical Memorandum
- E Geology and Soils Technical Memorandum
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- G Transportation Assessment
- H Hydrology and Water Quality Technical Memorandum
- I Noise Technical Memorandum

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADT	average daily trips
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AFY	acre-feet per year
BMP	best management practices
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Calexico UWMP	City of Calexico 2020 Urban Water Management Plan
CALGem	California Geologic Energy Management Division
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
the CSU	California State University
dBA	A-weighted decibel;
EIR	environmental impact report
FTE	full-time equivalent
GHG	greenhouse gas
HARP2	Hotspots Analysis and Reporting Program
HRA	health risk assessment
ICAPCD	Imperial County Air Pollution Control District
ips	inches per second
IS	Initial Study
IVCCD	Imperial Valley Community College District
kWh	kilowatt-hour
L _{eq}	energy equivalent continuous sound level
MM	Mitigation Measure
MS4	Municipal Separate Storm Sewer System
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO _x	oxides of nitrogen

Acronym/Abbreviation	Definition
Off-Campus Center - Calexico	San Diego State University Imperial Valley Off-Campus Center - Calexico
PM _{2.5}	fine particulate matter
PM ₁₀	coarse particulate matter
PPV	peak particle velocity
PRIMP	Paleontological Resource Impact Mitigation Program
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAG	Southern California Association of Governments
SDSU	San Diego State University
SR	State Route
SSAB	Salton Sea Air Basin
SVP	Society of Vertebrate Paleontology
TAC	toxic air contaminants
VMT	vehicle miles traveled

Mitigated Negative Declaration

Project Name: San Diego State University (SDSU) Imperial Valley Off-Campus Center - Calexico, Affordable Student Housing Project (Project or 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 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 a Master Plan for the Off-Campus Center - Calexico 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 Brawley Off-Campus Center affiliated with SDSU. The EIR, which was prepared pursuant to the requirements of the California Environmental Quality Act (CEQA), was certified and the Master Plan for the Off-Campus Center - Calexico was approved by the CSU Board of Trustees in 2003. The Off-Campus Center - Calexico Master Plan provides the framework for development of the facilities necessary to serve a projected future enrollment of 850 full-time equivalent (FTE) students. The Proposed Affordable Student Housing Project would not increase student enrollment at the Off-Campus Center - Calexico above the previously approved 850 FTE student projection.

Brief Project Description: The proposed Project would involve the construction of a single-story, four-building complex, approximately 12,840 square feet in size, that would provide affordable student housing. The complex would include three student housing buildings, including one smaller live-in unit building, and a community building. Two of the three proposed residential buildings would each be approximately 5,500 square feet in size and would include five four-bedroom, two-bathroom apartment units, totaling 40 student beds per building (2 student beds per bedroom, 80 student beds in total). The third proposed residential building would be a live-in manager unit that would consist of a single two-bedroom, one-bathroom apartment. The proposed live-in unit would also include approximately 100 square feet of office space intended to provide a space for tenant meetings, social services, or counseling. All apartment units would also be equipped with a living area and kitchen. The proposed community building would be approximately 840 square feet and include laundry, mail, restroom, electrical, and maintenance facilities.

Other on-site proposed amenities include a courtyard, bike racks, and a community waste enclosure. The courtyard would be approximately 1,600 square feet and would be centrally located in the proposed complex. Approximately 15 bike racks would be provided throughout the Project site.

The 80 student beds would be occupied by students attending both the SDSU Off-Campus Center - Calexico and the Imperial Valley College in Imperial. SDSU and the Imperial Valley Community College District (IVCCD) have executed a 30-year master lease agreement to support basic housing needs for students in the Imperial Valley. Under the agreement, 40 of the proposed student beds would be reserved for IVCCD students who attend the Imperial Valley College in Imperial, and 40 beds would be reserved for SDSU Off-Campus Center - Calexico students.

Project Location: The proposed Project would be located at SDSU's Imperial Valley Off-Campus Center - Calexico, which is located at 720 Heber Avenue in the downtown area of the City of Calexico, approximately 0.5 miles north of the United States–Mexico border in Imperial County (see Figure 1, Regional Map).

Initial Study: An Initial Study has been prepared in accordance with 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 Air Quality, Biological Resources, Geology and Soils, Noise, Transportation, and Tribal Cultural Resources. However, the Initial Study identifies mitigation measures, listed below, which, in combination with mitigation measures previously adopted as part of the SDSU Imperial Valley Campus Master Plan EIR, 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, Cultural Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, 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:

AQ-1: 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.

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 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.

BIO-1: 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.

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.

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 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.

GEO-1: 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 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.

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.

NOI-1: 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.

TRA-1: 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 plan shall be implemented during Project construction activities and shall be discontinued upon completion of Project construction.

TCR-1: 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.

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.

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.

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.

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.

1 Introduction

The purpose of this section is to describe the proposed San Diego State University (SDSU) Imperial Valley Off-Campus Center - Calexico, Affordable Student Housing Project (Project or proposed Project) for the public, reviewing agencies, and decision-makers. The proposed Project will provide housing for approximately 80 students attending both the Off-Campus Center - Calexico and the Imperial Valley Community College District (IVCCD).

The Off-Campus Center - Calexico is located at 720 Heber Avenue in downtown Calexico, approximately 0.5 miles north of the United States–Mexico border (See Figure 1, Regional Map) Regional access to the Off-Campus Center - Calexico is provided via State Route (SR)-111 and SR-98 to the north. The Off-Campus Center - Calexico is bordered by four streets: Heber Avenue to the west, East Sherman Street to the north, Blair Avenue to the east, and East 7th Street to the south. The proposed Project site is approximately 0.58 acres in size (25,320 square feet) and is located at the southeast corner of the Off-Campus Center - Calexico, at the northwest corner of East 7th Street and Blair Avenue. (See Figure 2, Vicinity Map.)

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. (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. Based on the results of the IS analysis, a Mitigated Negative Declaration is proposed for adoption by the California State University (the CSU) Board of Trustees.

In 2003, the Board of Trustees of the CSU certified the SDSU Imperial Valley Master Plan Environmental Impact Report (2003 Campus Master Plan EIR) (State Clearinghouse No. 2002051010), which established a framework for future development of the Off-Campus Center - Calexico. Section 15168(c) of the CEQA Guidelines provides that following preparation of a program EIR such as the 2003 Campus Master Plan EIR, later activities within the program (i.e., later activities within the previously approved Campus 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 would be required to determine if preparation of an EIR or negative declaration/mitigated negative declaration would be the appropriate CEQA document. 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 Affordable Student Housing Project, which is within the scope of the Imperial Valley Campus Master Plan covered by the 2003 Campus Master Plan EIR. The IS identifies potentially significant effects (air quality, biological, cultural/tribal, paleontological, noise, and transportation), although compliance with standard CSU and SDSU construction requirements and mitigation measures, in combination with applicable mitigation measures previously adopted as part of the 2003 Campus Master Plan EIR, would either avoid the potentially significant impacts or mitigate such impacts to a point where clearly no significant effects would occur. As such, preparation of a mitigated negative declaration, which tiers from the previously certified 2003 Campus Master Plan EIR and is based on the analysis presented in this IS, 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 provides an overview and background of the proposed Project and 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 and identifies report preparers.

Appendices A–I. Technical reports and other documents used during preparation of this IS are provided as appendices.

2 Project Description

2.1 Introduction

The purpose of this section is to describe the proposed Project for the public, reviewing agencies, and decision-makers.

Pursuant to CEQA, Public Resources Code Section 21000 et seq., 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).¹

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 section describes the proposed Project, including its location, objectives, and characteristics, and the intended uses of this environmental document. The Board of Trustees of the CSU, which is the State of California acting in its higher education capacity, on behalf of SDSU, is the lead agency 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, the CSU certified an environmental impact report for the SDSU Imperial Valley Master Plan Project (State Clearinghouse No. 2002051010) and approved a Campus Master Plan for the expansion and improvement of the SDSU Imperial Valley Off-Campus Center, which includes locations in the Cities of Calexico (City) and Brawley, both located in Imperial County (SDSU 2003). The Imperial Valley Off-Campus Center is an extension of SDSU's main campus in San Diego and furthers the University's regional educational mission to provide additional educational opportunities to the outlying communities of Imperial County. The previously certified and approved Campus Master Plan and EIR provided the authorization necessary for enrollment of 850 full-time equivalent (FTE)² students at the Imperial Valley Off-Campus Center, corresponding associated faculty and staff, and a framework for development of the facilities necessary to serve this projected enrollment and campus population.

The Off-Campus Center – Calexico is approximately 8.3 acres in size and is located in the City. Most of the Off-Campus Center - Calexico is built out, consisting of several educational and support facilities. The environmental impacts associated with development of the Off-Campus Center - Calexico were evaluated at a program level of review in the 2003 EIR. In the CSU's continuing effort to build out the Imperial Valley Off-Campus Center and provide additional educational opportunities, SDSU presently proposes construction and operation of a four-building

¹ Although it has not been determined that preparation of an EIR is 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, categorical exemption, or EIR ultimately is prepared.

² A full-time equivalent student is one full-time student taking 15 course credits, or 3 part-time students each taking 5 course credits.

complex that would provide affordable student housing at the Calexico location for 80 students and a resident manager. Additional details regarding the proposed housing are provided below.

2.3 Project Location and Existing Conditions

The Off-Campus Center - Calexico is located at 720 Heber Avenue in downtown Calexico, approximately 0.5 miles north of the United States–Mexico border (see Figure 1). Regional access to the Off-Campus Center is provided via SR-111 and SR-98 to the north. The Calexico location is bordered by four streets: Heber Avenue to the west, East Sherman Street to the north, Blair Avenue to the east, and East 7th Street to the south. Residential uses bound the Off-Campus Center - Calexico complex to the north, east, south, and west. Other surrounding uses include Calexico High School, located to the northeast, and Calexico City Hall, located immediately south. The Off-Campus Center currently consists of 17 buildings and an associated surface parking lot (see Figure 2, and Figure 3A, Existing Campus Master Plan).

As a state entity, the CSU/SDSU is not subject to local government plans, regulations, and guidelines, such as those contained in the City’s General Plan. The above notwithstanding, for information purposes, the Off-Campus Center Calexico is zoned as Open Space and is designated as Public Facilities in the City’s General Plan (City of Calexico 2015a).

The proposed Project site is approximately 0.58 acres in size (25,320 square feet) and is located at the southeast corner of the Off-Campus Center- Calexico, at the northwest corner of East 7th Street and Blair Avenue (see Figure 2). The entirety of the Project site has previously been graded and is relatively flat in nature, with an average elevation of 3.5 feet above mean sea level. The Project site encompasses the locations identified in the Campus Master Plan as future Building 21 (see Figure 3A and Figure 3B, Proposed Campus Master Plan). The Project site consists of vacant and undeveloped land with two trees located along the northern boundary of the site. A chain-link fence separates the Project site from the recently removed temporary Campus Buildings 201, which were located immediately west of the Project site.

2.4 Project Elements

2.4.1 Affordable Student Housing Complex

The proposed Project would involve the construction of a single-story, four-building complex approximately 12,840 square feet in size that would provide for affordable student housing. The complex would include three student housing buildings, including one smaller live-in unit building, and a community building. Two of the three proposed residential buildings would each be approximately 5,500 square feet in size and would include five four-bedroom, two-bathroom apartment units, totaling 40 student beds per building (2 student beds per bedroom, 80 student beds in total). The third proposed residential building would be a live-in manager unit that would consist of a single two-bedroom, one-bathroom apartment. The proposed live-in unit would also include approximately 100 square feet of office space that is intended to provide a space for tenant meetings, social services, or counseling. All apartment units would also be equipped with a living area and kitchen. The proposed community building program would be approximately 840 square feet and include laundry, mail, restroom, electrical, and maintenance facilities. The mail room would be located outside, under the shaded amenity patio of the community building (see Table 1).

Table 1. Affordable Student Housing Complex Area Calculations

	Quantity	Area (square feet)	Beds
Residential Buildings (3)			
4-Bedroom, 8-Bed Unit	5	5,150	40
4-Bedroom, 8-Bed Unit	5	5,150	40
Live-In Unit	1	1,000	2
Office (Included in Live-In Unit)	N/A	N/A	N/A
<i>Subtotal</i>	<i>11</i>	<i>11,300</i>	<i>82</i>
Community Building (1)			
Laundry Room	1	300	N/A
Service Rooms	4	450	N/A
Restroom	2	100	N/A
Mail/Package (Outside)	1	270	N/A
<i>Subtotal</i>	<i>N/A</i>	<i>1,150</i>	<i>N/A</i>
Other			
Trash/Recycling Enclosure	1	850	N/A
Open Space	N/A	2,300	N/A
Landscaping/hardscaping	N/A	12,500	N/A
<i>Subtotal</i>	<i>N/A</i>	<i>13,650</i>	<i>N/A</i>
Combined Total	N/A	26,100	82

Note: N/A = not applicable.

All square foot amounts presented in the table are approximate amounts only and may not add to the site plan area totals described in this document due to rounding.

Other on-site proposed amenities include a courtyard, bike racks, and a community waste enclosure. The courtyard would be approximately 1,600 square feet and would be centrally located in the proposed complex (see Figure 4, Site Plan). Approximately 15 bike racks would be provided throughout the Project site. A community waste enclosure at the northeast corner of the Project site would allow residents a convenient place to dispose of waste and recyclables.

2.4.2 Operation

The Off-Campus Center - Calexico, including the Project site, is owned and operated by the CSU/SDSU. The CSU Board of Trustees, on behalf of SDSU, is the lead agency responsible for certifying the adequacy and completeness of this document and approval of the proposed Project. SDSU and the IVCCD have received joint funding under the State of California Higher Education Student Housing Grant Program to construct the proposed Project.

To support basic housing needs for students in the Imperial Valley, SDSU and IVCCD have executed a 30-year master lease agreement that details operation of the Project. This agreement dictates that 40 of the 80 proposed student beds would be reserved for IVCCD students who attend the Imperial Valley College in Imperial. Likewise, 40 of the proposed 80 beds would be reserved for SDSU Off-Campus Center - Calexico students. A two-bedroom unit would also provide living space for on-site management, for a total of 82 beds. SDSU would be responsible for operating, managing, and maintaining the proposed Project once operational.

Student beds made available under the proposed Project would be leased/rented to eligible low-income students. Eligible low-income students are defined as having 30% of 50% of the Annual Median Income for Imperial County. In the event, after a good faith outreach effort, there is not sufficient demand from students meeting the eligibility requirements within 90 days of the start of the fall semester, unassigned beds may be leased at market rates to SDSU and IVCCD students not meeting the low-income eligibility requirements. In addition to meeting the low-income criteria, eligible students would be required to be enrolled students and take a minimum average of 12 degree-applicable units per semester term, or the quarterly equivalent (with exceptions permitted), to facilitate timely degree completion.

2.4.3 Other Project Elements

Building and Site Design

The proposed buildings have been designed to reflect the character and massing of the existing Off-Campus Center - Calexico and the surrounding neighborhood (see Figure 5, Project Renderings). Building design is centered around a courtyard-style housing complex and would consist of smooth stucco walls with downspouts and rafters, punctuated by composite terra cotta-colored roof tile accents and windows. Maximum building heights would range from 14 feet to 18 feet (see Figure 6, Building Elevations).

Landscaping, Other Site Improvements, and Lighting

The Project would include approximately 16,000 square feet of on-site landscaping and hardscape improvements (i.e., pedestrian walkways). All proposed landscaping would consist of drought-tolerant, indigenous plants. The landscape scheme would include shrubs, hedges, and a variety of trees. A total of 39 trees would be added to the Project site including five fan palms, eight mesquite trees, six evergreen elms, and 20 yucca trees.

All exterior on-site lighting would be hooded or shielded, directed downward, and would be compliant with applicable standards for lighting control and light pollution reduction (i.e., Title 24, American National Standards Institute/Illuminating Engineering Society).

The proposed complex would be secured via an iron security fence that would measure 6 feet in height and run approximately 64 linear feet, connecting to the proposed buildings. Access to the complex would only be available to residents and their guests via two pedestrian gates located at the northwestern corner and southern portion of the proposed complex. The gates would be equipped with security card access for residents.

Utilities and Public Services

New points of connection for domestic water, fire supply water, sewer, storm drainage and electrical connections from existing utility lines would be required to serve the proposed Project. Potable water service and sewer collection services at the Project site would be provided by the City. The Project would connect to an existing sanitary sewer maintenance access line located in Blair Avenue via new 6-inch mains (see Figure 7, Utilities Plan). Connections for water (including domestic, fire, and irrigation) would be from an existing water main located in Blair Avenue. Distribution water pipes would be extended underground to serve each proposed building. A new water meter would be located in the proposed maintenance room in the community building. Adequate water treatment capacity and supply and sewer treatment capacity exists within the City's water and sewer system to accommodate the Project; therefore, no capacity upgrades to infrastructure would be necessary.

Stormwater drainage includes two stormwater catch basins. One basin would be located on the eastern boundary of the Project site, and the second would be situated immediately east of the existing chain-link fence at the western boundary of the Project site. The proposed catch basins would function as both water quality and flood control features, by filtering out surface water contaminants and slowing stormwater runoff prior to stormwater discharge into the City's stormwater system via one new storm drain located in the southeast corner of the Project site.

Electrical services within the Project area are provided by Imperial Irrigation District, which provides electric power to over 158,000 customers in the Imperial Valley in addition to areas of Riverside and San Diego counties (IID 2024). New utility connections and infrastructure would be required to support electrical services on site. The Project would connect to on-site electrical power infrastructure via an existing 12kV, three phase, three wire, 60 Hertz overhead line routed along East 7th Street. No natural gas usage is proposed for the Project.

The Project would require a new point of connection for on-site telecommunications and would connect to the existing AT&T communications via the on-campus minimum point of entry.

Access, Circulation, and Parking

Regional access to the Project site is provided via SR-111 and SR-98 to the north. Local access is provided via Blair Avenue and East 7th Street. Parking to the Project site is available in the existing campus parking lot, immediately north of the Project site, which has sufficient capacity to serve the proposed Project. On-site circulation improvements would consist of additional paved pathway/pedestrian walkway features throughout the proposed complex and along the northern boundary of the Project site (see Figure 4). Emergency access would be provided directly adjacent to the Project site on East 7th Street and Blair Avenue.

2.4.4 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 adopting the first systemwide sustainability policy, which applies sustainable principles across all areas of university operations, including facility operations and utility management. In May 2024, the CSU Sustainability Policy was updated to expand on existing sustainability goals (CSU 2024a). The CSU Sustainability Policy seeks to integrate sustainability into all facets of the CSU, including academics, facility 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 (Title 24 of the California Code of Regulations).

As a result, all CSU new construction, remodeling, renovation, and repair projects, including the proposed Project, would be designed with consideration of optimum energy utilization, low life cycle operating costs, and compliance with all applicable state energy codes and regulations. Progress submittals during design are monitored for individual envelope, indoor lighting, and mechanical system performances. In compliance with these goals, the proposed Project would be equipped with solar ready design features that would facilitate and optimize the future installation of a photovoltaic solar system.

2.4.5 Off-Site Improvements

Off-site improvements would include the resurfacing of a portion of Blair Avenue adjacent to the eastern boundary of the Project site that would be disturbed as a result of trenching to make necessary connections to the existing water main and sanitary sewer maintenance access. Any area disturbed as a result of this connection within Blair

Avenue would be resurfaced to existing conditions. All off-site improvements would occur within the Blair Avenue right-of-way.

2.4.6 Construction

Construction would be performed by qualified contractors. Plans and specifications would incorporate stipulations regarding standard CSU/SDSU requirements and acceptable construction practices, such as those set forth in the SDSU Stormwater Management Plan (2022), CSU Seismic Policy (2024b), the CSU Office of the Chancellor Guidelines (2024c), and the CSU Sustainability Policy (2024a), regarding grading and demolition, safety measures, vehicle operation and maintenance, excavation stability, erosion control, drainage alteration, groundwater disposal, public safety, and dust control.

Construction Timeline

Construction of the proposed Project would take approximately 17 months to complete and is estimated to begin as early as January 2025 and be completed by May 2026, with occupancy planned for fall 2026. Construction activities would generally occur Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m., with the potential for weekend construction on Saturday between 9:00 a.m. and 5:00 p.m. No construction would occur on Sundays or holidays or at night.

Construction Activities

A construction mobilization or staging area would be located immediately northeast of the proposed Project site and would occupy approximately 8,000 square feet. The area would be located east of existing Campus Building 6, west of Blair Avenue, and south of the existing parking lot (see Figure 2 and Figure 3A). To accommodate use of this area, four trees would be removed.

Construction would include site preparation, grading and excavation, utility installation/trenching, building foundation pouring, building construction, and landscaping. Excavation depths are anticipated to be 3 feet below grade. The majority of waste (i.e., excavated gravel/soil) generated during Project construction would be balanced/used within the site. Approximately 2,600 cubic yards of soil would be removed from the site and exported to Republic Services Allied Imperial Landfill, approximately 12 miles north. The entire Project site, including construction mobilization area (approximately 34,000 square feet in total) would be disturbed as a result of Project construction. Two trees would be removed from the Project site to accommodate the proposed Project.

Table 2 displays the construction equipment anticipated to be used during construction.

Table 2. Anticipated Construction Equipment

Aerial Lifts	Pressure Washers
Air Compressors	Pumps
Cement and Mortar Mixers	Rollers
Concrete/Industrial Saws	Rough Terrain Forklifts
Dumpers/Tenders	Rubber-Tired Dozers
Excavators	Rubber-Tired Loaders
Forklifts	Scrapers

Table 2. Anticipated Construction Equipment

Generator Sets	Signal Boards
Graders	Skid Steer Loaders
Off-Highway Tractors	Surfacing Equipment
Off-Highway Trucks	Sweepers/Scrubbers
Other Construction Equipment	Tractors/Loaders/Backhoes
Other General Industrial Equipment	Trenchers
Other Material Handling Equipment	Welders
Plate Compactors	

Source: Dorsey and Nielson Construction Inc., pers. comm., 2024.

Construction Waste

The Project would generate construction debris during on-site clearing activities. In accordance with Section 5.408 of the California Green Building Standards Code, the Project would implement a construction waste management plan for recycling and/or salvaging for reuse of at least 65% of nonhazardous construction/demolition debris. Additionally, the Project would be required to meet Leadership in Energy and Environmental Design v4 requirements for waste reduction during construction. Solid waste generated during construction would be hauled off site to the Republic Services Allied Imperial Landfill at 104 East Robinson Road in Imperial, California.

2.5 Intended Uses/Project Actions and Approvals

2.5.1 Intended Uses

This CEQA document analyzes the potential environmental impacts associated with construction and development of 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.

2.5.2 Requested Project Approvals

The following approvals by the CSU Board of Trustees, or their designee, are required prior to implementation of the proposed Project:

1. Certification of adequacy and completeness of the CEQA document
2. Approval of amendment to the 2003 Imperial Valley Campus Master Plan, as applicable

Development of the proposed Project may require ministerial 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. City of Calexico (Encroachment Permit for utility connection/installation)

2.5.3 Responsible Agencies

Under CEQA, responsible agencies are public agencies other than the lead agency that have discretionary, as compared to ministerial, approval authority over the proposed Project. No agencies have been identified to have discretionary approval authority over the 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, one special-status species, the western mastiff bat, potentially uses the site for roosting, and, therefore, could be affected by development of the proposed Project. Therefore, the California Department of Fish and Wildlife is considered a trustee agency for that purpose.

3 Initial Study Checklist

1. Project title:

San Diego State University (SDSU) Imperial Valley Off-Campus Center - Calexico,
Affordable Student Housing 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:

Kara Peterson
Director of Planning
San Diego State University
Planning, Design and Construction
619.594.6619

4. Project location:

The Imperial Valley Off-Campus Center - Calexico is located at 720 Heber Avenue, Calexico, California 92231, in downtown Calexico. The proposed Project site is located in the southeast corner of the Calexico site, at the northwest corner of East 7th Street and Blair Avenue.

5. Project sponsor's name and address:

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

6. General plan designation:

The Project site is designated as Public Facilities (City of Calexico 2015a).

7. Zoning:

The Project site is zoned as Open Space (City of Calexico 2021).

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 an approximately 12,000-square-foot, single-story, four-building complex that would provide affordable student housing at the SDSU Imperial Valley Off-Campus Center - Calexico. The complex would include three student housing buildings, including one smaller live-in unit building, and a community building. Combined, the Project would provide a total of 80 student beds: 10 four-bedroom apartments (80 student beds). A 2-bedroom unit would also provide living space for on-site management (for a total of 82 beds). Other features of the proposed Project would include approximately 16,000 square feet of on-site landscaping and hardscape improvements (i.e., sidewalks, pedestrian walkways). The proposed Project would provide student housing for students attending both the Off-Campus Center - Calexico and IVCCD.

SDSU and the IVCCD have received joint funding under the State of California Higher Education Student Housing Grant Program to construct the proposed Project. To support basic housing needs for students in the Imperial Valley, SDSU and IVCCD have executed a 30-year master lease agreement that details operation of the Project. This agreement dictates that 40 of the 80 proposed student beds would be reserved for IVCCD students who attend the Imperial Valley College in Imperial. Likewise, 40 of the proposed 82 beds, would be reserved for SDSU students. A two-bedroom unit would also provide living space for on-site management, for a total of 82 beds. SDSU would be responsible for operating, managing, and maintaining the proposed Project once operational. Please refer to Chapter 2, Project Description, for additional information about the proposed Project uses.

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

The Off-Campus Center - Calexico is located at 720 Heber Avenue in downtown Calexico, approximately 0.5 miles north of the United States–Mexico border (see Figure 1). Regional access to the campus is provided via SR-111 and SR-98 to the north. The campus is bordered by four City streets: Heber Avenue to the west; East Sherman Street to the north; Blair Avenue to the east; and East 7th Street to the south. Residential uses bound the Off-Campus Center - Calexico to the north, east, south, and west. Other surrounding uses include Calexico High School, located northeast, and Calexico City Hall, located immediately south.

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 (The CSU Board of Trustees)
- Approval of minor amendment to 2003 Imperial Valley Master Plan (The CSU Board of Trustees)
- Other approvals, if any, as necessary (The CSU Board of Trustees)
- Approval of Encroachment Permit (City of Calexico)

- 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.?**

SDSU mailed AB 52 notification letters to all NAHC recommended tribes on July 26, 2024. SDSU received responses from the Campo Band of Mission Indians and the Viejas Band of Kumeyaay Indians. The Viejas Band of Kumeyaay Indians responded via email on August 1, 2024 and stated that should a Kumeyaay tribe in closer proximity to the Project site request to provide Kumeyaay Cultural Monitoring Services, Viejas Band of Kumeyaay Indians would defer to them. Campo Band of Mission Indians responded to the AB 52 notification and requested consultation. Because Campo Band of Mission Indians are in closer proximity to the Project site, Viejas Band of Kumeyaay Indians deferred to Campo Band of Mission Indians.

A virtual meeting between representatives of the CSU/SDSU and the Campo Band of Mission Indians was held on August 26, 2024. During the AB 52 consultation meeting, Campo Band of Mission Indians did not identify any tribal cultural resources within the Project area. However, at the request of both tribes, the CSU/SDSU will provide for cultural resources monitoring by a representative of the Campo Band of Mission Indians during Project construction activities. (For additional information regarding tribal cultural resources and related consultations, please see Section 3.5, Cultural Resources, and Appendix D of this IS.)

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving impacts that are “Less than Significant with Mitigation Incorporated,” as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" 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 checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" 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

December 19, 2024

Date

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as otherwise 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 type="checkbox"/>	<input checked="" 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"/>

The IS prepared as part of the 2003 Campus Master Plan EIR determined that no impacts would occur from development of the Campus Master Plan with regard to potential adverse effects to scenic vistas and no impacts would occur with regard to substantial damage to scenic resources within a state scenic highway. The IS also determined that impacts regarding the creation of a new source of substantial light or glare which could adversely affect day or nighttime views in the area would be less than significant. The EIR and IS did not analyze potential impacts to the existing visual character or quality of public views of the Project site and its surroundings (SDSU 2003).

The analysis presented below is based on the Aesthetics and Visual Resources Technical Memorandum prepared by Dudek, included in its entirety as Appendix A to this IS and incorporated herein by this reference.

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

Although the City’s General Plan Conservation and Open Space Element does not identify scenic vistas, it does mention available vistas of “expansive, flat, contiguous, irrigated cropland set against distant mountains” from unspecified locations (City of Calexico 2015a). Although not considered scenic vistas, the City’s croplands are identified as scenic visual resources by the City. Croplands surround the entirety of the City; however, the nearest croplands are located approximately 1 mile west of the Project site. Further natural features that may be considered scenic resources include the New River, which flows north into the

City and is approximately 0.7 miles from the southwestern corner of the Project site. Public access to the New River is currently prohibited due to severe contamination.

As noted, the City's General Plan does not identify any scenic vistas (City of Calexico 2015a). In addition, there are no City-identified scenic resources within the immediate area of the Project site. Furthermore, views of cropland are not available from public vantage points near the Project site or nearby segments of surrounding roads. Therefore, construction and operation of the proposed Project would have **no impact** on a scenic vista.

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 Project site is located approximately 31 miles from the nearest state scenic highway (i.e., SR-8 from the Yuha Cutoff). As a result, construction activities and operation of the Project would not be visible from any state scenic highway. In addition, although the Project site, including the construction staging area currently includes four mature eucalyptus trees, there are no rock outcrops, historic buildings, or other potentially scenic resources, including scenic visual resources located on the Project site. Therefore, the proposed Project would have **no impact** on scenic resources.

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 and IS did not analyze potential impacts to the existing visual character or quality of public views of the Project site and its surroundings (SDSU 2003). As explained below, the proposed Project would be located in a "non-urbanized area" for purposes of this criterion and, therefore, 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.

In accordance with Section 21071 of the California Public Resources Code, "urbanized area" means either of the following:

- (1) [An incorporated City that] Has a population of at least 100,000 persons.
- (2) [An incorporated City that] Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

As of July 1, 2022, the estimated population of the City was 38,249 persons (U.S. Census Bureau 2022). The City is not contiguous with any other incorporated cities in the United States. Therefore, Calexico is considered to be a non-urbanized area for purposes of CEQA, and accordingly, impacts are assessed in accordance with the first portion of the criterion.

In the immediate area surrounding the Project site, the City's existing visual character reflects a primarily residential environment as evidenced by the presence of single-family and multifamily homes to the north, east, south, and west. Public views of the site are available from East 7th Street and Blair Avenue. However,

the existing Calexico site contributes to the local visual environment through the existing educational facility that provides verticality and mass to the viewshed. Representative views of the Project site from surrounding areas are provided in Appendix A. The Project would be developed on a currently vacant and undeveloped lot that includes two trees located along the northern boundary of the site. Renderings of the proposed Project are presented in Figure 5, and as shown on the figure, the Project entails the introduction of a single-story, four-building complex with landscaping and other amenities that would provide affordable student housing at the Off-Campus Center - Calexico.

As proposed, the single-story buildings would not be larger than the existing multistory campus buildings and would be of a similar scale as residential structures in the immediate surrounding area. Further, proposed landscaping would be consistent with existing campus development and would enable the Project to blend into the existing setting. 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** related to the existing visual character.

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

Construction of the proposed Project would occur over approximately 17 months. Lighting sources anticipated to be installed on the Project site to support the Project would be similar to the existing lighting at the Off-Campus Center - Calexico, updated consistent with current Title 24 requirements. For example, walkway lighting consisting of low post or standard pole lighting could be installed in addition to wall-mounted (“wall pack”) fixtures on the exterior of the Project buildings. Overhead or lower-level bollard lighting in common areas (i.e., pathways, near building entrance) could also be installed. Consistent with existing uses at the campus, new lighting sources would be of appropriate intensity for the intended use (e.g., safety, security, and/or general illumination for pedestrians) and would be hooded or shielded 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, of the California Green Building Standards Code, which includes 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 standards.

Because lighting installed on the Project site would be hooded, directed downward, and compliant with applicable standards for lighting control and light pollution reduction (i.e., Title 24, American National Standards Institute/Illuminating Engineering Society), the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Accordingly, impacts related to light and glare would be **less than significant**, and no 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
<p>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:</p>				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Impacts related to conversion of farmland for the Off-Campus Center - Calexico were evaluated in Section 3.10, Agricultural Lands, of the 2003 Campus Master Plan EIR. The 2003 Campus Master Plan EIR determined that buildout of the campus would not result in the loss or conversion of any important farmland because the Calexico campus is not located on or near any agricultural lands. As such, the 2003 Campus Master Plan EIR determined that there would be no impact to agricultural lands at the Off-Campus Center - Calexico. Therefore, with regard to potential conflicts with agricultural zoning or a Williamson Act contract, no impact would occur.

The 2003 Campus Master Plan EIR and IS did not specifically address zoning or rezoning of forest land, timberland, or Timberland Production zones or the loss or conversion of forest land to non-forest use. An analysis of the proposed Project's potential impacts to agriculture and forestry resources is provided below.

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?***

As noted, the 2003 Campus Master Plan EIR determined that the Off-Campus Center - Calexico, which include the proposed Project site, is not located on or near any agricultural lands and there would be no impact to agricultural lands with development of the Campus Master Plan. Furthermore, according to the Department of Conservation Farmland Mapping and Monitoring Program, the Project site is not located on or near land designated as Farmland of Statewide Importance (DOC 2024). Therefore, the Project would not convert any additional land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As a result, **no impact** would occur.

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

As discussed above under Section 3.2(a) and in the 2003 Campus Master Plan EIR, the Off-Campus Center - Calexico is not located on or near any agricultural lands. The Project site is located within an existing college campus, which is located in a developed, residential area in downtown Calexico and does not contain land zoned for agricultural use or under a Williamson Act contract. Because the Project would not conflict with existing zoning for agricultural uses and the Project site is not identified under a Williamson Act contract, there would be **no impact**.

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))?***

As previously noted, as a state agency, the CSU is not subject to local land use planning or regulations, such as zoning. For information purposes, the Project site is zoned by the City as Open Space (City of Calexico 2021). As prescribed in Chapter 17.09 of the Municipal Code, this zoning allows for a variety of uses, including single-family dwellings, caretaker quarters, temporary uses and home occupations, accessory structures such as detached garages, carports, cabanas, and more, as well as public and private recreational facilities and other uses. The Project site and construction staging area is vacant land and only contains four trees. Open Space zoning does not include any forest land or timberland uses, nor is there any existing vegetation within the Project site that would be considered viable forest land or timberland uses. 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, and there would be **no impact**.

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

The 2003 Campus Master Plan EIR and IS did not specifically address the loss or conversion of forest land to non-forest use. As discussed above under Section 3.2(c), the Project site does not include any forest land, 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 **no impact** would occur.

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?

As noted, the 2003 Campus Master Plan EIR determined that buildout of the Campus Master Plan at the Off-Campus Center - Calexico site would not result in the loss or conversion of any important farmland as the site is not located on or near any agricultural lands and, as such, there would be no impact to agricultural lands. Therefore, impacts relative to the conversion of Farmland to non-agricultural use were previously analyzed in the 2003 Campus Master Plan EIR and no further analysis is required. However, because conversion of forest land was not specifically addressed in the 2003 Campus Master Plan EIR or IS, the proposed Project’s potential to convert forest land to non-forest uses is addressed here.

The Project site is not designated for Farmland or forest land uses and no forestry activities occur within or near the Project site. As a result, development of the proposed Project would not convert existing Farmland or forest land uses to non-forest uses. As a result, **no impact** would occur.

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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis prepared for the 2003 Campus Master Plan EIR determined that there would be no significant air quality impacts as a result of development of the Off-Campus Center Master Plan - Calexico. 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 Campus Master Plan EIR. The analysis presented below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum prepared by Dudek, included in its entirety as Appendix B to this IS and incorporated herein by this reference. A summary of the prior analysis is provided below along with the current Project-specific analysis for each criterion, as applicable.

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 parts per billion 8-hour Ozone Standard.

The analysis prepared for the 2003 Campus Master Plan EIR found that the Master Plan 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 Off-Campus Center - Calexico Master Plan and certified EIR, that determination remains applicable. However, because ICAPCD has adopted additional air quality plans because certification of the 2003 Campus Master Plan EIR, a discussion of the proposed Project's potential to conflict with applicable plans that post-date the certified 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 plan for the proposed Project is the 2003 Campus Master Plan. (Note: Local and regional plans, including the City's 2007 General Plan and the Imperial County General Plan, are not applicable because as a state entity, the CSU/SDSU is not subject to local government plans, regulations, and guidelines.)

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 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016), which was considered in the preparation of the air quality attainment plans, would demonstrate that the Project would not conflict with or obstruct implementation of the air quality plans.

As discussed in Chapter 2, student enrollment and corresponding faculty and staff resulting from the proposed Project would remain within the approved maximum FTE student enrollment analyzed in the previously certified EIR and approved Campus Master Plan for development of the Off-Campus Center - Calexico; the Campus Master Plan is included in Imperial County's General Plan Land Use Element (County

of Imperial 2015), which was in turn used to create SCAG's growth forecast for the region.³ Therefore, implementation of the proposed Project would not result in development in excess of what was anticipated in the approved Campus Master Plan and Imperial County General Plan, and would not result in population growth beyond what was assumed in SCAG's RTP/SCS.

Because 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**.

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?*

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 considerable contribution resulting in an 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 Campus Master Plan EIR was based on "typical worst day construction activities associated with a school campus construction project similar to the proposed project" (SDSU 2003). The 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. The 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 EIR analysis was 10,000 cubic yards 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 EIR.

Although the proposed Project fits within the impact analysis envelope of the 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 Project construction is provided.

Additionally, the operational emissions estimate in the EIR included emissions from motor vehicles associated with the projected FTE student enrollment of 850 ultimately expected at the Off-Campus Center-Calexico. The analysis found that trip generation associated with this increase in FTE students 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 student enrollment, the proposed Project is

³ Note that, although the Connect SoCal 2016 RTP/SCS is not the most current RTP/SCS adopted by SCAG, it is referenced here for contextual consistency as the regional plan considered during the preparation of the relevant regional air quality treatment plans.

consistent with the 850 FTE students previously analyzed in the EIR. However, the proposed Project would also accommodate IVCCD students who use their personal vehicles to commute to the IVCCD campus from the Project site. The emissions associated with these trips were not previously analyzed and are therefore included in the analysis herein.

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

Construction

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 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 are approximately estimated.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of reactive organic gases, 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 Regulation VIII (Fugitive Dust Control Measures) to control dust emissions generated during any dust-generating activities. These standard construction measures required by the ICAPCD 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 Project construction. 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.

California Emissions Estimator Model (CalEEMod) Version 2022.1 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 EIR. Maximum daily activity would require approximately 48 equipment hours per day, which is well within the scope of the 68 hours analyzed for the “typical worst day” in the EIR.

According to preliminary Project details, the material movement estimated for construction of the proposed Project is 2,600 cubic yards of cut to be exported off site, which also is within the scope of the previously identified 10,000 cubic yards analyzed in the EIR. Additional detail on Project-specific construction parameters is included in Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files, of Appendix B.

Table 3 presents the estimated maximum daily construction emissions generated during Project construction. Details of the emission calculations are provided in Attachment B of Appendix B.

Table 3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds per day					
2024	1.82	17.12	17.27	0.03	28.14	4.54
2025	2.32	15.25	16.27	0.03	28.03	4.45
2026	0.81	7.07	10.99	0.02	12.74	1.47
Maximum	2.64	17.12	17.27	0.03	28.14	4.54
<i>ICAPCD Threshold</i>	75	100	550	N/A	150	N/A
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG = reactive organic gas; 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; N/A = not applicable.

Emission reductions from implementation of Mitigation Measure (MM) AQ-1, which requires Tier 4 engines for all construction equipment greater than 50 horsepower, would reduce NO_x and PM emissions. Emission reductions from MM-AQ-1 were not captured in this table.

See Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files, of Appendix B, Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum, for complete results.

As shown in Table 3, emissions during Project construction would not exceed ICAPCD’s daily thresholds. Therefore, construction impacts associated with criteria air pollutant emissions would be **less than significant**.

Operation

Criteria air pollutant emissions from daily operation of the proposed Project were estimated using a combination of CalEEMod default parameters and Project-specific information provided by SDSU. Operational year 2026 was analyzed as it is anticipated to be the first year of operation following completion of Project construction. Criteria air pollutant emissions sources and associated information are discussed in Section 4.3, Construction Health Risk Methodology, of Appendix B. Table 4 presents the estimated maximum daily emissions generated during operation of the proposed Project. Details of the emission calculations are provided in Attachment B of Appendix B.

Table 4. Estimated Maximum Daily Operations Criteria Air Pollutant Emissions

Source	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds per day					
Mobile	0.38	0.19	1.91	<0.01	137.03	13.67
Area	0.34	0.01	0.57	<0.01	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.72	0.20	2.48	<0.01	137.03	13.67
<i>ICAPCD Threshold</i>	137	137	550	150	150	550
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG = reactive organic gas; 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.

<0.01 indicates values smaller than 0.005.

See Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files, of Appendix B, Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum, for complete results.

As shown in Table 4, the proposed 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 if: (1) the project's contribution accounts for a significant proportion of the cumulative total emissions; and (2) the project is inconsistent 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 reactive organic gas and NO_x emissions (which are precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. As indicated in Tables 3 and 4, 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 development 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, older adults, 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 receptors include residences approximately 80 feet to the south of the Project site and approximately 100 feet to the east 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 near 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 proximate to the site.

CO Hot Spots

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 VMT 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 generate trips associated with construction worker vehicles and construction vendor trucks accessing the site. Title 40 of the California Code of Regulations, Section 93.123(c)(5), 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 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.” Accordingly, although Project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities would be temporary 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**.

Valley Fever Exposure

Valley fever is a fungus that lives in the top 2 to 12 inches of soil; therefore, during soil disturbance, the fungal spores can be released into the air. The spores are too small to be seen by the naked eye, and there is no reliable way to test the soils for spores (CDPH 2021). The disease is caused by inhalation of dust containing *Coccidioides immitis*, the fungal spore. Most people who are exposed have no or very mild systems; however, in a small percentage of the population, it can generate more serious symptoms of meningitis, pneumonia, or chronic fatigue.

The Project site is located in Imperial County, which is a county where valley fever is considered endemic. With 20 reported incidences of valley fever in 2022 (CDPH 2022), the rate of valley fever in Imperial County is 11.2 per 100,000 people, which is lower than the California average of 19.1 per 100,000 people. Furthermore, incidence of valley fever decreased 6.8% from 2021 and 16.6% from 2019.

Construction workers have increased risk of valley fever exposure where their tasks include the disturbance of soils where fungal spores are found. Valley fever infection rates are highest in California from June to

November. Therefore, a risk of valley fever infection exists for construction personnel working on the Project in the peak summer and fall months.

Importantly, the risk of exposure to valley fever from construction-related dust during Project build-out would be minimized by Project compliance with the ICAPCD’s Regulation VIII, Fugitive Dust Control Measures. Rule VIII sets forth best available control measures and standards of practice for minimizing and preventing the generation of dust; examples of such measures include the regular watering of disturbed soil and the application of chemical stabilizers to minimize dust. Due to the Project’s required compliance with these applicable regulatory standards, which suppress the release of dust that may contain fungal spores, impacts to construction workers and nearby sensitive receptors 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 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 emissions from heavy equipment use.

An health risk assessment (HRA) was performed to evaluate potential health risk associated with construction of the Project. Concentrations of TACs would be highest during construction due to the intensity and concurrence of off-road equipment usage. Conversely, operation of the Project, which is residential in nature and would not include any on-site stationary sources (e.g., emergency generator), would not generate considerable quantities of TACs; therefore, an operational HRA is not required for the Project.

The following discussion summarizes the dispersion modeling and HRA methodology. Supporting construction HRA documentation, including detailed assumptions, is presented in Attachment C, Construction Health Risk Modeling Files, of Appendix B.

As discussed in Section 4.3 of Appendix B, a construction HRA was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for residential receptors as a result of Project construction. Results of the construction HRA are presented in Table 5.

Table 5. Construction Health Risk Assessment Results - Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per million	58.26	10	Potentially Significant
Chronic Hazard Index – Residential	Index value	0.04	1.0	Less than Significant

Source: Attachment C, Construction Health Risk Modeling Files, of Appendix B, Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum.

Note: CEQA = California Environmental Quality Act.

As shown in Table 5, Project construction activities would result in a Residential Maximum Individual Cancer Risk of 58.26 in 1 million, which exceeds the significance threshold of 10 in 1 million. Project construction would result in a Residential Chronic Hazard Index of 0.04, which is below the 1.0 significance threshold.

To mitigate the potential impacts associated with emissions of TACs, Mitigation Measure (MM) AQ-1, which requires the use of Tier 4 Final engines on construction equipment, is proposed to reduce diesel particulate matter emissions during Project construction to a level below the applicable threshold. Table 6 summarizes the results of the HRA for Project construction after mitigation.

Table 6. Construction Health Risk Assessment Results - Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per million	8.28	10.0	Less than significant with mitigation
Chronic Hazard Index – Residential	Index value	0.01	1.0	Less than significant

Source: Attachment C, Construction Health Risk Modeling Files, of Appendix B, Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum.

Note: CEQA = California Environmental Quality Act.

As shown in Table 6, the results of the construction HRA for the Project demonstrate that following implementation of MM-AQ-1, construction emissions resulting in a potential incremental increase in cancer risk and chronic risk concentrations would each be below the respective thresholds. As such, the Project would result in a **less-than-significant impact with mitigation incorporated** in regard to potential health risk resulting from mitigated TAC emissions generated during construction.

Mitigation Measure

The following mitigation measure would reduce the potential for direct and indirect air quality impacts due to construction-related air pollutants to by ensuring that construction equipment use Tier 4 engines during construction activities to the extent possible. Implementation of the following mitigation measure would reduce potential impacts to a **less-than-significant level**.

MM-AQ-1: **Construction Equipment Emissions Reductions.** Prior to the commencement of construction activities, 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 (CARB) and that all such equipment shall be used during Project construction.

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 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 CSU/SDSU to confirm that necessary Project-generated emissions and health risk reductions are achieved.

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 (reactive organic gas or NO_x) that would exceed the ICAPCD thresholds, the Project would not substantially contribute to regional O₃ concentrations and associated health impacts. Similar to construction, Project 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 (because nitrogen dioxide is a constituent of NO_x). Exposure to nitrogen dioxide can cause lung irritation, bronchitis, and pneumonia and can lower resistance to respiratory infections. As depicted in Tables 3 and 4, 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 nitrogen dioxide 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. 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 is also 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 2023). 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 would not 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 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 EIR, the proposed Project remains consistent with 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, there would be **no impact** from construction odors that would affect a substantial number of people.

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).

The proposed Project would include student housing buildings, which are not expected to produce any nuisance odors; therefore, there would be **no impact** related to odors caused by the proposed Project during operations.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

Potential impacts of the Campus Master Plan related to Biological Resources including species listed as candidate, sensitive, or special-status were evaluated in Section 3.4, Biological Resources of the 2003 Campus Master Plan EIR. The EIR found that buildout of the Calexico site would not result in significant impacts to biological resources. A summary of the prior analysis is provided below along with the current Project-specific analysis for each criterion, as applicable. The analysis presented below is based on the Biological Resources Technical Memorandum prepared by Dudek, included in its entirety as Appendix C to this IS and incorporated herein by this reference.

- 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?***

A present-day Project-specific analysis for the proposed affordable student housing Project was conducted to determine whether the Project would have a substantial adverse effect on a listed species. Ornamental trees on the Project site have limited potential to support nesting and foraging for western mastiff bat, a California Department of Fish and Wildlife Species of Special Concern. In general, due to the developed and disturbed conditions of the site and surrounding areas (i.e., no natural habitat areas or preserves), the potential for western mastiff bat to roost on the Project site is extremely low. However, the bat may still use the limited amount of ornamental trees or buildings in the study area and, as a result, may be impacted by construction and development of the Project. Accordingly, potential direct impacts to the bat, a special-status species, are considered significant absent mitigation. The western mastiff bat reproduces in California from April through September, which coincides with the avian nesting season. It forages at night throughout the year. Implementation of MM-BIO-1 would ensure western mastiff bat would not be impacted by Project construction activities as any potential bat roosts in trees or buildings would be surveyed for potential avian nests during the pre-construction survey. Therefore, potential impacts to listed species would be **less than significant with mitigation incorporated**.

In addition to the potential presence of the western mastiff bat on the Project site, the study area contains ornamental trees, shrubs, and maintained grass that potentially would be used by migratory birds for breeding and nesting. The Project site contains two ornamental trees adjacent to the northern boundary, and adjacent to the site there are trees along the northern and western boundaries that could support nesting birds.

Project construction could result in direct and indirect impacts to migratory nesting birds. Indirect impacts to nesting birds from short-term, construction-related noise could result in decreased reproductive success or abandonment of an area used for nesting habitat if construction were conducted during the breeding/nesting season (i.e., February through September). In general, due to the developed and disturbed conditions of the site and surrounding areas (i.e., no natural habitat areas or preserves), the potential for impacts to biological resources to occur is low. However, direct and indirect impacts to nesting birds would be potentially significant absent mitigation. In addition to mitigating potential impacts to the western mastiff bat, implementation of MM-BIO-1 also would ensure that any impacts to nesting birds due to Project construction activities during nesting season would be reduced to **less than significant with mitigation**.

Mitigation Measure

The following mitigation measure would reduce the potential for direct and indirect impacts to special-status species and migratory birds by ensuring that such species would be avoided during construction activities to the extent possible. Implementation of the following mitigation measure would reduce potential impacts to a **less-than-significant level**.

MM-BIO-1: Pre-Construction Nesting Bird and Special-Status Bat Survey. 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 CSU/SDSU, or its designee, shall retain a biologist to conduct a 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.

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.

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 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) ***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 IS prepared for the 2003 Campus Master Plan EIR determined that no impact related to adverse effects on riparian habitat or other sensitive natural communities would occur. The study area for the Project presently proposed does not contain riparian vegetation communities or any native vegetation communities including those identified as sensitive according to the California Department of Fish and Wildlife. As a result, **no impacts** to sensitive communities would 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 2003 Campus Master Plan 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. As such, **no impacts** to protected wetlands are expected to occur.

- 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 2003 Campus Master Plan EIR determined that no impacts related to wildlife movement or migration would occur. The Project presently proposed is not located within an area that functions as a wildlife movement or migration corridor and is within an urban setting that lacks native habitat. As such, the proposed Project would not constrain natural wildlife movement in its vicinity and **no impacts** 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 2003 Campus Master Plan EIR determined that no impacts related to conflicts with local biological resources policies or ordinances would occur. Preliminarily, as a state entity, the CSU/SDSU is not subject to local government plans, policies, regulations, and guidelines, such as those contained in the City of Calexico General Plan. In addition, as described in the Project Description, the Project site and construction staging area contain only four non-native trees that would require removal. Neither the City nor the CSU/SDSU has any General Plan policies or ordinances that would require these trees be protected. As such, the Project would not conflict with any policies or ordinances protecting biological resources. Therefore, **no impacts** would occur.

- 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 2003 Campus Master Plan EIR determined that no impact related to conflicts with local habitat conservation plans would occur. There are no habitat conservation plans or natural community conservation plans that have been adopted within the City or within the Project area. The Imperial Irrigation District developed a planning agreement in 2006 for a regional habitat conservation plan, but that plan is still in development and has not yet been adopted (CDFG 2006). As such, the Project would not conflict with any applicable plans and **no impacts** 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

Impacts to historical resources pursuant to Section 15064.5 were evaluated in the IS prepared for the 2003 Campus Master Plan EIR, which concluded that no significant impacts to historical resources would occur. Impacts to archaeological resources pursuant to Section 15064.5 and human remains were evaluated in Section 3.5, Cultural Resources, of the 2003 Campus Master Plan EIR. The EIR concluded that there would be no significant impacts to cultural resources as a result of development of the proposed Campus Master Plan. However, the 2003 Campus Master Plan EIR recommended including a mitigation measure that outlines response protocol and requirements in the event that potential resources were discovered during excavation and/or construction associated with buildout of the Off-Campus Center - Calexico.^{4,5} The analysis presented below is based on the Cultural Resources and Tribal Cultural Resources Technical Memorandum prepared by Dudek, included in its entirety as Appendix D to this IS and incorporated herein by this reference.

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

Dudek’s current cultural resources inventory of the Project site did not identify any historical resources within the Project area. A records search conducted by the Southern California Information Center did not identify any historical resources present within the Project area. Additionally, an intensive pedestrian survey did not identify any historical resources within the Project area. Additionally, there are no historic-era (greater than

⁴ Section 3.5 Mitigation Measure 1: 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.” 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.

⁵ All applicable mitigation measures from the 2003 Campus Master Plan EIR will be included in the Mitigation Monitoring and Reporting Program for this Project.

45 years old) buildings or structures present within the Project area. Therefore, the Project would not result in an adverse change in the significance of a historical resource pursuant to Section 15064.5 and Project implementation would have **no impact** on the significance of a historical resource.

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

The Project-specific analysis conducted for the proposed Project included a review by Dudek of the current cultural resources inventory for the Project site. The review concluded that there is low sensitivity, or low likelihood, for identifying intact subsurface archaeological resource deposits during Project construction. The records search did not identify any archaeological resources within the Project area. Additionally, an intensive pedestrian survey did not identify any archaeological resources pursuant to Section 15064.5 within the Project area. A review of aerial photographs reveals that a majority of the Project area had been previously graded during construction of the adjacent campus structures, parking lot, and roadways. Accordingly, any intact archaeological subsurface deposits that were present likely would have been disturbed by previous grading and would no longer remain intact.

However, because Project development includes ground-disturbing activities associated with construction of the new buildings, the potential to encounter and/or destroy previously undiscovered archaeological materials or features during earth-moving activities, while low, does exist. Any substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 would be a potentially significant impact. Therefore, continued/ongoing implementation of the Cultural Resources mitigation measure included in the 2003 EIR and previously adopted by the Board of Trustees, which requires a temporary suspension of construction activities in the event of an archaeological discovery and evaluation of the find by a qualified archaeologist, is still recommended to ensure impacts would be **less than significant**.

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

The current Project-specific analysis notes that the Project area is not used as a cemetery and is not otherwise known to contain human remains. A pedestrian field survey conducted of the site did not identify any human remains or find any indications that human remains would be expected to be found within the Project area. However, although unlikely, there is the possibility of human remains being discovered during Project-related ground-disturbing activities. Therefore, the provisions of the previously adopted mitigation measure continue in effect through Project construction: if remains are discovered during Project construction activities, the CSU/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 California 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, in combination with the previously adopted mitigation measure, would ensure appropriate treatment of any human remains if discovered during construction. Impacts would be **less than significant**.

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 Campus Master Plan EIR was certified, an evaluation of energy was not required under CEQA. In furtherance of the Project presently proposed, and pursuant to CEQA Guidelines Section 15168(c)(1), a Project-specific analysis of the proposed Project’s energy impacts relating to construction and operation has been prepared as described below. The analysis presented is based on the Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum prepared by Dudek, included in its entirety as Appendix B to this Initial Study (IS) and incorporated herein by this reference.

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 and petroleum-based fuels for off-road equipment. 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 the Off-Campus Center - Calexico would increase due to 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 (CSU 2024a). Further, although 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. Separate analyses for construction and operational use follow below.

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 and nominal and would cease upon the completion of construction. Imperial Irrigation District is the electricity provider to the Project site and provided approximately 3,584 gigawatt-hours of electricity to its entire service area in 2022 (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 Imperial Irrigation District 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, and 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, whereas worker vehicles are analyzed based upon gasoline fuel use. Construction is estimated to last approximately 17 months beginning in November 2024. The conversion factor for gasoline is 8.78 kilograms per metric tons (MT) CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per MT CO₂ per gallon (The Climate Registry 2023). The estimated diesel fuel usage from construction of the proposed Project is shown in Table 7.

Table 7. Estimated Construction Fuel Use

Construction Year	Off-Road Equipment (diesel)	On-Road Vendor Trucks (diesel)	On-Road Haul Trucks (diesel)	On-Road Workers (gasoline)
	Fuel Use (gallons)			
2024	2,794	N/A	276	252
2025	2,905	92	56	267
2026	2,948	118	N/A	248
Total	8,646	210	332	767

Source: See Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files, of Appendix B, Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum, for complete results.

Totals may not sum precisely due to rounding.

Notes: N/A = not applicable.

As shown in Table 7, construction of the proposed Project is anticipated to require 767 gallons of gasoline and 9,188 gallons of diesel over the 17-month construction period. This amount of petroleum equates to 13,545 therms of energy consumed. The most recent data for the County shows that countywide gas consumption totaled approximately 41 million therms in 2022 (CEC 2023b). Thus, the Project's construction fuel consumption would represent a temporary increase of approximately 0.033% in gas consumption over the current countywide usage. Furthermore, 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, which requires the vehicle fleet to reduce emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emissions Control Strategies. Construction activities would not consume fuel in a wasteful or inefficient manner or contribute to the unnecessary consumption of fuel required over the short-term construction period to power construction equipment. 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 Attachment B of Appendix B.

CalEEMod default values for energy consumption for the proposed Project were applied for the Project analysis. The energy use from nonresidential 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 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 45,858 kilowatt-hours (kWh) per year. Because natural gas is not incorporated in Project operations, the default natural gas consumption assumed by CalEEMod for space heating, water heating, etc. was converted to kWh and added to the demand, totaling 95,571 kWh per year. For context, in 2022, California used approximately 290 billion kWh of electricity (CEC 2023c). Locally, in 2022, nonresidential electricity demand in Imperial County was approximately 891 million kWh (CEC 2023c).

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 (CSU 2024a). 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 the CSU's goal 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 be generated by vehicle fuel consumption, consisting of the trips generated by those student residents commuting to the IVCCD campus from the Project site.

Annual petroleum use from operation from vehicle fuel consumption would be approximately 5,248 gallons per year. By comparison, California as a whole consumed approximately 26 billion gallons of petroleum in 2022 (EIA 2024), and in 2022 Imperial County consumed an estimated 66 million gallons of gasoline and an estimated 30 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.

Conclusion

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 or inefficient and would not result in unnecessary energy resource consumption. Relatedly, because 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. Therefore, impacts would be **less than significant**.

Of note, and consistent with the greenhouse gas (GHG) emissions impact analysis presented in Section 3.8, Greenhouse Gas Emissions, of this IS, 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 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 (CBC) (24 CCR Part 6). Additionally, as discussed in Section 3.8 of this IS, the proposed Project would not conflict with the CSU 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 the CSU’s goal 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 3.8 of this IS, 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 checked="" type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

Impacts related to rupture of a known earthquake fault were evaluated in Section 3.2, Geology/Soils, of the 2003 Campus Master Plan EIR, which concluded that the Off-Campus Center - Calexico is not within the limits of the Alquist-Priolo Special Studies Zones of the Imperial and Brawley Faults (SDSU 2003). Therefore, the EIR did not provide an impact conclusion regarding potential rupture of a known earthquake fault. However, because the Master Plan is not located on the Alquist-Priolo Earthquake Fault Zoning Map, as discussed below, no impact would have been identified. A summary of the prior analysis is provided below along with the current Project-specific analysis for each criterion.

The analysis presented below is based on the Geology and Soils Technical Memorandum and Paleontological Resources Assessment Technical Memorandum prepared by Dudek, included in their entirety as Appendices E and F to this IS and incorporated herein by this reference. The Project-specific geotechnical report (Attachment B of Appendix E) includes recommendations to address strong seismic ground shaking, liquefaction, differential settlement, and seismic densification; these recommendations are required by law to be implemented (Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings [CGS 2022]). Additionally, the Project would be designed in accordance with the CSU Seismic Requirements document (CSU 2024b), which includes 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.

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 Campus Master Plan EIR, which concluded that the Calexico Off-Campus Center - Calexico is not within the limits of the Alquist-Priolo Special Studies Zones of the Imperial and Brawley Faults (SDSU 2003). Therefore, the 2003 Campus Master Plan EIR did not provide an impact conclusion regarding potential rupture of a known earthquake fault. However, because the Master Plan is not located on the Alquist-Priolo Earthquake Fault Zoning Map, as discussed below, it can be assumed no impact was identified.

As to the Project-specific analysis for the presently proposed Project, the Holocene-active Imperial Fault is the closest fault to the Off-Campus Center - Calexico, located approximately 7 miles to the northeast. The campus is not located in an Alquist-Priolo Earthquake Fault Zone, and no known active faults are present in the immediate site vicinity. No new information or substantial changes in circumstances have occurred since certification of the EIR requiring new or additional analysis regarding rupture of a known earthquake fault at the Project site. As a result, surface fault rupture is not anticipated, and the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault and **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, Geology/Soils, of the 2003 Campus Master Plan EIR, which concluded that although no geotechnical conditions were identified to preclude development of the Calexico Master Plan, impacts due to hazards from seismic activity could occur if proper construction techniques are not observed at the detailed design and construction stages (SDSU 2003). Mitigation measures were adopted that require SDSU to: (1) avoid adverse discontinuities in strength between major structural elements, (2) conduct a subsurface geotechnical and soil study to ensure structural integrity prior to detailed site planning, and (3) adhere to recommendations of the geotechnical and soil study in developing grading and construction plans (SDSU 2003, pp. 3.2-4, 3.2-5, and 11-1).⁶ With implementation of the mitigation measures, impacts were determined to be less than significant.

Specific to the Project presently proposed, updated information since completion of the EIR related to seismicity, including liquefaction and fluid injection, is summarized here. 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. There are two other major northwest-trending Holocene-active fault zones bounding the Salton Trough including the San Jacinto Fault to the northwest and the Elsinore Fault to the southwest (see Figure 5 in Appendix E). In addition, the Holocene-active Imperial Fault is located 7 miles northeast of the Off-Campus Center- Calexico, and the Brawley Seismic Zone is located approximately 17 miles to the north. Fluid injection and geothermal energy extraction in the North Brawley Geothermal Field, located within the Brawley Seismic Zone, have been linked to seismic hazards.

Geotechnical borings drilled on the Project site encountered several loose to medium dense, 2- to 4-foot-thick beds of silty sand and nonplastic silt, which are potentially liquefiable under a high seismic demand. Liquefaction-induced settlement and seismic compaction are considered likely to occur given the site surface and subsurface conditions. The estimated liquefaction-induced differential

⁶ Section 3.2, Geology/Soils, Mitigation Measures 1 and 2: (1) Adverse discontinuities in strength between major structural elements shall be avoided. (2) 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 (SDSU 2003, pp. 3.2-4, 3.2-5, and 11-1).

settlement is approximately 0.5 inches or less over a horizontal distance of 30 feet. Because the site is essentially level, the potential for significant liquefaction-induced lateral displacement is low.

Since the 2003 EIR was certified, the CEQA Guidelines 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 buildings would not induce seismicity, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and, consequently, **no impacts** would occur. For these reasons, the mitigation measure adopted as part of the 2003 Campus Master Plan EIR is not applicable to the proposed Project. Nonetheless, SDSU shall implement the measure to the extent applicable, including the preparation and adherence to recommendations of a geotechnical report.

Regardless, the following is an updated discussion of standard construction and design protocol that would be followed with respect to seismic engineering of the proposed buildings. As required by the 2022 CBC, the proposed Project and associated infrastructure improvements would be constructed in accordance with the recommendations of the Project-specific geotechnical report (Attachment B of Appendix E), which includes recommendations for remedial grading and foundation design to address strong seismic ground shaking, liquefaction, differential settlement, and seismic densification. Accordingly, although referred to as “recommendations” in geotechnical reports, each recommendation is, in fact, required by law to be implemented. More specifically, the geotechnical report recommends the use of thickened and heavily reinforced conventional building foundations or post-tensioned slabs to reduce the potential for distress to the proposed buildings associated with post-liquefaction settlement (Attachment B of Appendix E). Design and construction in accordance with these recommendations would provide, to the extent feasible, an acceptable level of earthquake safety for students, employees, and the public who occupy the buildings.

In addition, the Project would be designed in accordance with the CSU Seismic Requirements document (CSU 2024b), which includes 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. The CSU Seismic Policy applies 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. The CSU has established campus-specific seismic ground motion parameters that supersede CBC requirements and implement a conservative evaluation on CBC Structural Risk Category assignments.

The proposed buildings 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, including the risk of loss, injury, or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction. For these reasons, **no impacts** would occur.

iv) Landslides?

The IS prepared for the 2003 Campus Master Plan EIR determined that no impacts would occur with regard to landslides (SDSU 2003). The topography of the Off-Campus Center - Calexico and surrounding area is relatively flat to gently sloping, and no evidence of ancient landslides or slope instabilities is present. The entirety of the Project site has previously been graded and is relatively flat in nature, with an average elevation of 3.5 feet above mean sea level. With implementation of the required recommendations provided in the Project-specific geotechnical report (see Attachment B of Appendix E), the CBC, grading and construction would not cause slope instability to occur. For example, temporary excavations and any vertical excavations be shored and stabilized during construction. As a result, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, impacts would be **less than significant**.

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

The 2003 Campus Master Plan EIR and IS 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 Project site is approximately 0.58 acres in size (approximately 25,320 square feet), and the construction staging area would occupy approximately 8,000 square feet, immediately northeast of the Project site, east of existing Campus Building 6, west of Blair Avenue, and south of the existing parking lot (see Figure 2 and Figure 3A). The entirety of the Project site has previously been graded and is relatively flat. 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. Approximately 2,600 cubic yards of soil would be removed from the site.

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, compliance with SDSU's stormwater best management practices (BMPs) during grading and construction to minimize the potential for soil erosion. BMPs would be consistent with construction site runoff controls detailed in the SDSU Stormwater Management Plan (SDSU 2022), including erosion controls, sediment controls, and run-on/runoff controls. Typical construction BMPs would include use of straw wattles, sediment basins, sediment fences, covering stockpiled soil, vehicle track-out controls at entrance/exit points, and limitations on work periods during storm events. Based on the SDSU Stormwater Management Plan, construction sites less than 1 acre (such as the Project site) would be inspected weekly by the SDSU Environmental Health and Safety staff for proper BMP implementation. If the Environmental Health and Safety staff deems work is not in compliance with minimum BMPs set forth in the construction contract language, they would provide the contractor with a list of actions required to bring the site into compliance. Staff would re-inspect the site within 72 hours after notifying the contractor of the deficiencies. After construction, the Project site would be developed with impermeable surfaces and approximately 16,000 square feet 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 completed for the 2003 Campus Master Plan EIR concluded that no impacts would occur with respect to potentially unstable geologic units, including landslides, lateral spreading, subsidence, liquefaction, and collapse (SDSU 2003). Since the EIR was certified, the CEQA Guidelines have been revised (per Appendix G of the 2022 CEQA Statute and Guidelines). Geological 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 and an updated discussion of protocol that would be followed with respect to geotechnical engineering of the proposed buildings. In addition, updated information since completion of the EIR related to liquefaction and subsidence are summarized below. New information pertaining to liquefaction and subsidence is also presented in Appendix E to this IS.

As described above under (a)-ii and (a)-iii, although the Project would be susceptible to potentially strong seismically induced ground shaking and liquefaction, Project design and construction would be completed in compliance with the 2022 CBC, the recommendations of the Project-specific geotechnical report (see Attachment B of Appendix E), and the CSU Seismic Requirements document (CSU 2024b). CSU Architecture and Engineering review would further assist to offset potential risks to structures and people associated with liquefaction and collapsible soils. In addition, buildings proposed 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, thus eliminating the potential for lateral spreading to occur. As described above under (a)-iv, the Project site would not be susceptible to landslides.

On-site clay rich soils are compressible and should experience some time-dependent consolidation settlement (i.e., long-term settlement). Silty sand and silt beds should also settle with initial fill and structural loading (i.e., short-term settlement). Assuming minimal fill placement is needed at the site to achieve the proposed finish grades and foundation loading is limited to the bearing pressures provided in the recommendations of the geotechnical report (Attachment B of Appendix E), most of the long-term settlement should occur in a relatively short time following initial loading. Zones of thick clay could experience some time-dependent consolidation settlement if significant loading from fill or foundation loads are proposed for the Project. However, Project design and construction would be completed in accordance with the recommendations of the Project-specific geotechnical report, which include estimating the settlement magnitude and duration associated with the proposed fill placements and foundation loads. As a result, potential impacts related to compressible soils would be minimized.

Clayey surficial soils present a severe risk of sulfate attack and are also corrosive to very corrosive to buried metals. The geotechnical report (included as Attachment B of Appendix E) recommends placement of 2 to 5 feet of imported sand beneath sidewalks and building slabs-on-grade to reduce the potential for sulfate attack and corrosion. Sulfate-resistant Type V cement is also recommended for use on site. As a result, potential impacts related to sulfate attack and corrosive soils would be minimized.

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 zero near the Mexican border and the Project site. 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 3.5 miles northwest of the Calexico site. Satellite radar interferometry was applied to detect surface deformation associated with geothermal development, which determined that distinct areas of subsidence are present in three geothermal fields in the Imperial Valley, including 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 34 miles northwest, 3 miles northwest, and 15 miles northeast of the Off-Campus Center - Calexico, 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 California Geologic Energy Management Division (CalGEM) for each major geothermal project and are subject to review by CalGEM and Imperial County, thus minimizing the potential for subsidence to occur. In addition, construction and operation of the proposed Project 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, Geology/Soils, of the 2003 Campus Master Plan EIR, which concluded that although no geotechnical conditions had been identified to preclude development of the Imperial Valley Campus Calexico Project as planned, geology and soil impacts are significant because of the hazards from expansive soils if proper construction techniques are not observed at the detailed design and construction stages (SDSU 2003). Mitigation measures were provided that would require SDSU to: (1) conduct a subsurface geotechnical and soil study to determine the shrink-swell potential prior to detailed site planning, and (2) adhere to recommendations of the geotechnical and soil study in developing grading and construction plans (SDSU 2003, pp. 3.2-4, 3.2-5, and 11-1). With implementation of the mitigation measures, impacts were determined to be less than significant.

Soil sampling completed on the Project site indicated that moderately expansive soils are present in near surface soils, to a depth of 5 feet. Project design and construction would occur in compliance with recommendations of the Project-specific geotechnical report (included as Attachment B of Appendix E) and the provisions of the 2022 CBC, which requires that grading, structural design, and construction be completed such that potentially expansive soils would not adversely affect foundations, piping, and related infrastructure. The geotechnical report recommends that the clay-rich, expansive soil excavated as part of the Project not be re-used as compacted fill. Fill should be imported to replace expansive soil materials underlying the proposed structures, flatwork, and pavements, to depths of 2 to 5 feet. Additional measures include thickened foundations and slabs or post-tensioned slab-on-grade to support the proposed buildings.

Project design would also be completed in accordance with the 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 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 (SDSU 2003). The proposed buildings would be connected to existing sewer infrastructure operated by the City. 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.

As to the Project-specific analysis conducted for the presently proposed Project, no paleontological resources were identified within the Project site based on a records search and desktop geological and paleontological literature review. The nearest locality is located 7 miles west of the Project site and produced shells of freshwater gastropods and mussels (Appendix F). The Project site is underlain by late Pleistocene to Holocene lake deposits, which have high paleontological sensitivity. If intact paleontological resources are located on site, ground-disturbing activities associated with construction of the proposed Project, such as grading during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. As such, the Project site is considered to be potentially sensitive for paleontological resources, and without mitigation, the potential damage to paleontological resources during construction is considered a potentially significant impact. Given the proximity of past fossil discoveries in the surrounding area within similar Pleistocene deposits, the Project site is highly sensitive for supporting paleontological resources below the depth of fill and weathered lake deposits. However, upon implementation of mitigation measure MM-GEO-1, impacts would be reduced to **less than significant with mitigation incorporated**.

Mitigation Measure

The following mitigation measure would reduce the potential for direct and indirect impacts to any unknown paleontological resources that may be uncovered during Project construction by requiring preparation of an impact mitigation program and establishing the protocol to follow in the event any resources are unearthed. Implementation of the following mitigation measure would reduce impacts to a **less-than-significant level**.

MM-GEO-1: Prior to commencement of any grading activity on site, 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 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.

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.

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 Campus Master Plan EIR was certified, an evaluation of GHG emissions was not required under CEQA. Therefore, the impact of Project-related construction and operational GHG emissions was not previously considered. The CEQA Guidelines were updated in 2018 and pursuant to Section 15168(c)(1) an analysis of a project’s GHG emissions is required. Therefore, an analysis of the proposed Project’s GHG emissions has been prepared as described below. The analysis presented below is based on the Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum prepared by Dudek, included in its entirety as Appendix B to this IS and incorporated herein by this reference.

- 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. Construction of the Project is anticipated to commence in late November 2024 and would last approximately 17 months, ending in March 2026. On-site sources of GHG emissions include off-road equipment, and off-site sources include vendor trucks and worker vehicles. Table 8 presents forecast construction emissions for the Project from on-site and off-site emission sources.

Table 8. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	R	CO ₂ e
	Metric Tons per Year				
2024	33.52	<0.01	<0.01	0.01	33.78
2025	217.65	0.01	<0.01	0.04	218.94
2026	45.14	<0.01	<0.01	0.01	45.39
Total	296.31	0.01	<0.01	0.05	298.11
<i>Amortized (30-year Project Life)</i>					9.94

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R = refrigerants; CO₂e = carbon dioxide equivalent. See Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files, of Appendix B, Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum, for complete results. Totals may not add due to rounding.

As shown in Table 8, the estimated total GHG emissions during Project construction would be approximately 298 MT CO₂e (carbon dioxide equivalent) over the construction period. Estimated Project-generated construction emissions amortized over 30 years would be approximately 10 MT CO₂e per year. GHG emissions generated during construction of the Project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Therefore, construction impacts associated with directly or indirectly generating a significant quantity of GHG emissions would be **less than significant**.

Operational Emissions

Once operational, the proposed Project would result in GHG emissions from energy use, vehicle travel/mobile sources, solid waste, water use, wastewater generation, and refrigerants. As with construction, GHG emissions from Project operations were estimated using CalEEMod based on a combination of Project-specific details provided by SDSU and default parameters, where necessary. All details for operational criteria air pollutants discussed in Appendix B are also applicable for the estimation of operations-related GHG emissions. As such, see Section 5 of Appendix B for a discussion of the operational emissions calculation methodology.

Mobile

As discussed previously, the proposed Project would not increase SDSU Imperial Valley FTE student enrollment beyond the level previously approved within the 2003 EIR; therefore, the operational mobile source GHG emissions associated with the Off-Campus Center - Calexico need not be included in this assessment. However, the 2003 EIR did not assess the trips generated by those student residents commuting to the IVCCD campus from the Project site. These trips were analyzed within the Transportation Technical Memorandum for the proposed Project. Following the guidance of this document, a conservative estimate of 79 daily trips was used to model these GHG emissions within CalEEMod (Dudek 2024).

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., residential). For residential buildings, CalEEMod energy intensity value (electricity or natural gas usage per dwelling unit per year) parameters are based on the Residential Appliance Saturation Survey. 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 the CSU's goal 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 would 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 converted to kWh/year and added to the Project electrical consumption 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 Attachment B of Appendix B.

Annual electricity emissions were estimated in CalEEMod using the emissions factors for Imperial Irrigation District, which would be the electricity provider for the Project. CalEEMod default energy intensity factors (CO₂, methane, and N₂O mass emissions per kWh) for Imperial Irrigation District are based on the forecasted factors for the operational year.

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 hydrofluorocarbons 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 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 9 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 year of operation following completion of Project construction. Details of the emission calculations are provided in Attachment B of Appendix B.

Table 9. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	R	CO _{2e}
	Metric Tons per Year				
Energy	19.79	<0.01	<0.01	N/A	19.88
Mobile	46.27	<0.01	<0.01	0.07	47.19
Water Use	2.85	0.06	<0.01	N/A	4.91
Solid Waste	0.67	0.07	<0.01	N/A	2.33
Area	0.19	<0.01	<0.01	N/A	0.19
Refrigerants	N/A	N/A	N/A	0.01	0.01
Total Annual Operational Emissions	69.76	0.13	<0.01	0.08	74.51
<i>Amortized 30-year Construction Emissions</i>					9.94
Total Annual Project Emissions					84.45
<i>SCAQMD Threshold</i>					3,000
Threshold Exceeded?					No

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; R = refrigerants; CO_{2e} = carbon dioxide equivalent; N/A = not applicable; SCAQMD = South Coast Air Quality Management District.

<0.01 indicates values smaller than 0.005.

See Attachment B, Air Quality and Greenhouse Gas Emissions CalEEMod Output Files, of Appendix B, Air Quality, Greenhouse Gas Emissions, and Energy Technical Memorandum, for complete results.

Totals may not add due to rounding.

As shown in Table 9, the estimated total GHG emissions during operation of the proposed Project would be approximately 84 MT CO_{2e} per year, including amortized construction emissions. The proposed Project would not exceed the South Coast Air Quality Management District threshold of 3,000 MT CO_{2e} 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**.

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

Plans adopted to reduce GHG emissions applicable to the proposed Project include the CSU Sustainability Policy, as most recently revised in May 2024; the 2017 Climate Action Plan (CAP) for San Diego State University; CARB’s Scoping Plan; and SCAG’s Connect SoCal 2024. 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 2024. The Sustainability Policy was developed to integrate sustainability into all facets of the CSU system, including academics, facility 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 2024a). It seeks 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; CAP; Energy Resilience and

Procurement; Energy Conservation, Carbon Reduction, and Utility Management; Water Conservation; Sustainable Procurement; Waste Management; Sustainable Food Service; Sustainable Building and 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 meet or exceed the minimum requirements equivalent to Leadership in Energy and Environmental Design 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 the CSU's goal 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. Although 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 a focus on the SDSU main campus location in San Diego. 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 San Diego. 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 EIR for the approved Off-Campus Center - Calexico Master Plan. The Project features housing that would accommodate both SDSU Imperial Valley and IVCCD students. Those SDSU students living at the Project site would no longer have to commute to school, whereas the IVCCD students would travel to the IVCCD campus from the site. The Transportation Technical Memorandum prepared for this proposed Project determined that the SDSU Imperial Valley students would generate a nominal number of net vehicle trips, whereas the IVCCD students would generate an average 79 daily trips (Dudek 2024; Appendix G, Transportation Assessment). As a whole, the Project was determined to be screened out from conducting a VMT analysis and would result in a less-than-significant VMT impact. The Project is, therefore, unlikely to conflict with the CAP.

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 goal of the CAP is 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 water systems.

Consistent with this vision, the Project would not use natural gas, and all space and water heating would be electrified. The proposed Project would also exceed the Title 24 Building Energy Efficiency Standards by

at least 10% and would meet or exceed the minimum requirements equivalent to Leadership in Energy and Environmental Design Silver consistent with the CSU Sustainability Policy, reducing overall energy demand and consumption.

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 elimination of natural gas supports SDSU's goal to achieve carbon neutrality through increased energy efficiency for campus operations.

Potential to Conflict with CARB's Scoping Plan

The California state legislature passed the Global Warming Solutions Act of 2006 (Assembly Bill [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 (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. Although 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 toward 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, which includes 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 toward 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 the potential for on-site solar power generation, Project implementation would support the 2022 Scoping Plan's goals above.

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. Although 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 Imperial County's contribution to GHG emission reduction targets in California.

Potential to Conflict with SCAG's 2024 RTP/SCS "Connect SoCal"

SCAG has jurisdiction over Imperial County and is responsible for the RTP/SCS. As required by federal and state regulations, the RTP/SCS is updated every 4 years. In April 2024, SCAG adopted the 2024-2050 RTP/SCS. Connect SoCal 2024-2050 builds upon prior planning cycles to update the vision of the region's future (SCAG 2024). SCAG's Connect SoCal 2024-2050 RTP/SCS is a long-range visioning plan that balances

future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS is a regional growth management strategy, which targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain the GHG emission reduction targets set forth by CARB, the 2024–2050 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2024–2050 RTP/SCS would result in more complete communities with various transportation and housing choices while reducing automobile use.

The 2024–2050 RTP/SCS identifies the following strategy areas to support its environmental goals: Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, and Climate Resilience. An analysis of the Project's compliance with the applicable strategies is presented below.

- **Sustainable Development.** The 2024–2050 RTP/SCS identifies sustainable development, including water and energy-efficient building practices and green infrastructure, as a strategy to reduce GHG emissions. The proposed Project would include green building design and construction practices pursuant to Leadership in Energy and Environmental Design Silver certification. Furthermore, the Project would utilize electricity for water and space heating systems (as opposed to natural gas). The modified Project would continue to promote sustainability at the Off-Campus Center - Calexico.
- **Air Quality.** The 2024–2050 RTP/SCS identifies air quality and meeting federal and state ambient air quality standards as a co-benefit of reducing GHG emissions. The Project would not exceed the ICAPCD's threshold of significance for any criteria air pollutant and would not result in any significant impacts related to air quality following mitigation.
- **Clean Transportation.** The 2024–2050 RTP/SCS identifies EV charging infrastructure, adoption of zero-emission vehicles, and clean transit as ways to reduce GHG emissions from mobile sources. As discussed previously in Chapter 2, the proposed Project would promote clean transportation through its proximity to campus. SDSU Calexico student occupants of the proposed development would reside adjacent to campus, thereby reducing the need to commute to school in personal vehicles. Additionally, the Project would promote clean transportation by providing bicycle storage on site.
- **Natural and Agricultural Lands Preservation.** The 2024–2050 RTP/SCS promotes the conservation and restoration of natural and agricultural lands through several policies, such as quantifying the carbon sequestration potential of natural and agricultural lands and prioritization of sensitive habitat and wildlife corridors for permanent protection. The proposed Project would not result in the removal of natural or agricultural lands.
- **Climate Resilience:** The 2024–2050 RTP/SCS promotes regional coordination and solutions for effective emergency response for climate-related hazards. Additionally, in the category of climate resilience, SCAG has established the following policies: prioritize the most vulnerable populations and communities subject to climate hazards; support local and regional climate and hazard planning; support nature-based solutions to increase regional resilience; promote sustainable water use planning; and support an integrated planning approach to help jurisdictions meet housing needs in a drier environment. Although the proposed Project does not directly pertain to these climate resilience efforts, the Project would not interfere with these policies. The proposed

Project would repurpose existing vacant space on an already developed site, which is generally considered more efficient and sustainable than new construction.

Based on the analysis provided above, 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**.

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 checked="" type="checkbox"/>	<input 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"/>

Impacts related to hazards and hazardous materials were evaluated in the IS and Section 3.3, Hazardous Materials/Public Safety of the 2003 Campus Master Plan EIR. The 2003 Campus Master Plan EIR determined that the expansion of the Off-Campus Center - Calexico would not result in environmental impacts related to hazardous materials. A summary of the prior analysis is provided below along with the current Project-specific analysis for each criterion is provided below.

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

The presently proposed Project involves construction and operation of an affordable student housing complex to be located within the existing school boundaries. 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. However, these materials are regulated under federal, state, and local laws, rules, and regulations such that their 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**.

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?*

As discussed above under criterion (a), although 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), 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 safety 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**.

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?*

The nearest schools to the Project site are the Calexico High School 9th Grade Campus and Dool Elementary School, which are located approximately 630 feet north, and approximately 1,050 feet northwest, respectively. However, as discussed above under criterion (a), although 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), 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, including schools. Also, the proposed Project is a residential development that would not use or store acutely hazardous materials. Household cleaners and possibly fertilizers for landscaping may be stored on site but these substances are not considered acutely hazardous materials. As such, impacts would be **less than significant**.

- 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?***

According to the California Environmental Protection Agency's regulatory database, the Project site is not identified on a hazardous materials site, nor were any sites identified near that contain hazardous materials that could potentially impact the environmental condition of the proposed Project (Cal EPA 2024). As such, **no impact** would occur.

- 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?***

The Calexico International Airport is located approximately 1.15 miles southwest of the Project site. As supported by the analysis in the IS and EIR, the proposed Project would not be located within the Calexico International Airport Compatibility Land Use Plan or within any other current airport land use plan 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?***

As discussed in Section 3.7, Public Services/Utilities, of the 2003 Campus Master Plan EIR, the proposed Calexico site expansion was not anticipated to significantly increase demand for emergency services and the City has adequate personnel to serve the existing campus.

The nearest primary fire agency serving the Off-Center Campus is the City of Calexico Fire Department Station 1, located approximately 725 feet southwest of the Project site. As discussed in Section 3.15, Public Services, of this IS, the City's Fire Department contracts with Imperial County and surrounding cities for the provision of fire services, when needed, to areas within the City, including the Calexico site (SDSU 2003). The Imperial County Fire Department and other surrounding City fire departments have mutual aid agreements and would continue to aid the City, as discussed in the 2003 Campus Master Plan EIR. Designated evacuation routes within the City include SR-111 and SR-98, and Interstate 8 (City of Calexico 2015b). The proposed Project would not impact these evacuation routes as the Project site is not located near these existing highways. As such, **no impact** would occur.

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

According to the California Department of Forestry and Fire Protection (CAL FIRE) Draft Fire Hazard Severity Zones in Local Responsibility Area Map (the Project site is located within a Local Responsibility Area), the nearest mapped High or Very High Fire Hazard Severity Zones are located approximately 30 miles southwest and 55 miles northwest of the Project site (CAL FIRE 2022). Moreover, the City's General Plan does not designate any High or Very High Fire Hazard Severity Zones within the City (CAL FIRE 2024; City of Calexico 2015a). Therefore, **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"/>
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 off site;	<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"/>

Impacts related to hydrology and water quality were evaluated in IS and Section 3.8, Hydrology/Flood Control, and Section 3.11, Water Quality, of the 2003 Campus Master Plan EIR. The 2003 Campus Master Plan EIR determined that the expansion of the Off-Campus Center - Calexico would not result in significant environmental impacts related to hydrology and water quality. A summary of the prior analysis is provided below along with the current Project-specific analysis for each criterion. The analysis presented is based on the Hydrology and Water Quality Technical

Memorandum prepared by Dudek, included in its entirety as Appendix H to this IS and incorporated herein by this reference.

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 Campus Master Plan EIR, which concluded that the potential surface water and groundwater quality impacts during construction would be less than significant with implementation of a construction stormwater pollution prevention plan, as required by the Clean Water Act (SDSU 2003). Because the Project site is under 1 acre in size, preparation of a stormwater pollution prevention plan is not required.

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.

Installation of stormwater BMPs would be required during grading and construction to minimize the potential for soil erosion and potential off-site migration of construction related pollutants, per the SDSU Stormwater Management Plan (SDSU 2022). BMPs would be consistent with construction site runoff controls detailed in the SDSU Stormwater Management Plan (SDSU 2022), including good site management housekeeping, non-stormwater management, erosion controls, sediment controls, and run-on/runoff controls. Typical construction BMPs would include straw wattles, sediment basins, sediment fences, covering stockpiled soil, vehicle track-out controls at entrance/exit points, limitations on work periods during storm events, temporary secondary containment around portable toilets and equipment fueling areas, and on-site storage of absorbent pads for potential small spills. After construction, the Project site would be developed with impermeable surfaces and approximately 16,000 square feet of on-site landscaping, thus eliminating the potential for soil erosion. Based on the SDSU Stormwater Management Plan, construction sites less than 1 acre (such as the Project site) would be inspected weekly by the SDSU Environmental Health and Safety staff for proper BMP implementation. If the Environmental Health and Safety staff deems a project is not in compliance with minimum BMPs set forth in the construction contract language, they would provide the contractor with a list of actions required to bring the site into compliance. Staff would re-inspect the site within 72 hours after notifying the contractor of the deficiencies. 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. 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 applicable basin plan, the Regional Water Quality Control Board's Colorado River Basin Plan.

Based on implementation of the above practices, 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 Campus Master Plan EIR, concluded that no significant impacts to water quality were expected because the City has an established storm drain system. In addition, the 2003 Campus Master Plan EIR concluded that the existing Calexico Off-Campus Center - Calexico is a developed and urban use; therefore, no increase in impervious surfaces are anticipated (SDSU 2003). The 2003 Campus Master Plan EIR did not include mitigation measures related to water quality.

As to the present proposed Project, the Project site is predominantly unpaved and includes turf and two trees, which allows stormwater to infiltrate into the subsurface, thus reducing stormwater runoff, erosion, and downstream sedimentation. Following construction, the Project site would be developed with impermeable surfaces and approximately 16,000 square feet of on-site landscaping, thus eliminating the potential for soil erosion and off-site siltation. Runoff from building rooftops 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 and time since the last rainfall. Without design features to capture and treat stormwater runoff, the increase in the developed area could have adverse water quality impacts on downstream drainages.

As noted above, SDSU is enrolled under the State Water Resources Control Board Phase II Small Municipal Separate Storm Sewer System (MS4) General Permit 2013-0001 DWQ, which provides permit coverage for non-traditional MS4s, such as public campuses (SWRCB 2024). Stormwater infrastructure would be located throughout the Project site and would direct all stormwater to two stormwater catch basins. One basin would be located on the eastern boundary of the Project site, and the second would be situated near the western boundary of the Project site. In compliance with the Small MS4 General Permit and the SDSU Stormwater Management Plan (SDSU 2022), the catch basins would include bio-retention features. Section 10 of the SDSU Stormwater Management Plan includes post-construction stormwater management protocol, including development, implementation, and enforcement of a program to address discharges of post-construction stormwater runoff from impervious areas for new development and redevelopment projects. The program includes site design measures, low impact development design standards, source control measures, stormwater treatment and baseline hydromodification, alternative designs for bioretention, an alternative post-construction stormwater management program, and operation and maintenance of post-construction stormwater management measures. As a result, the proposed catch basins would 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 water or groundwater quality. Impacts would be **less than significant**, and no 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 Campus Master Plan EIR determined that no impact would occur regarding decreased groundwater supplies or groundwater recharge (SDSU 2003) based on the following set of facts: (1) the City's Department of Public Works provides potable water services to users within the incorporated city limits, which includes the Off-Campus Center - Calexico; (2) the Imperial Irrigation District distributes raw water from the Colorado River to the City, including the Calexico site and (3) groundwater is not used as a potable or nonpotable water source on the Calexico site. As a result, no impacts would occur with respect to groundwater supplies.

As to the present proposed Project, following Project construction, changes in land cover (e.g., increases in impervious surfaces) could affect the amount of stormwater that percolates into the ground versus the amount that runs off into the downstream storm drains. However, construction of the proposed buildings and associated pedestrian walkways would have a nominal effect on groundwater recharge due to the small scale of the proposed impervious surfaces, in comparison to existing conditions. In addition, the Project would include bio-retention basins that would be located throughout the Project site, and approximately 16,000 square feet of on-site landscaping and hardscaping. These pervious areas would slow runoff and enhance groundwater recharge.

As such, direct impacts of the proposed Project on 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 off site?***
- 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 Campus Master Plan EIR, which concluded that

the majority of the Off-Campus Center - Calexico consists of impervious surfaces and is surrounded by urban development (SDSU 2003). No increase in impervious surfaces would occur because of the Project, and as a result, the Project would not have an adverse impact on the hydrology of the site or surrounding area and impacts were less than significant.

The presently proposed Project would involve the construction of additional improvements that would increase the impervious surface area; these include the proposed buildings, pedestrian walkways, and landscaping. As discussed above under criterion (a), the Project site is predominantly unpaved and includes turf and trees, which allows stormwater to infiltrate into the subsurface, thus reducing stormwater runoff, erosion, and downstream flooding. Similarly, following construction, the Project site would be developed with impermeable surfaces and approximately 16,000 square feet of on-site landscaping, thus eliminating the potential for soil erosion and siltation of downstream of the site.

In compliance with the Phase II Small MS4 General Permit, stormwater infrastructure would be located throughout the Project site and would direct all stormwater to two bio-retention basins. One basin would be located on the eastern boundary of the Project site, and the second would be situated near the western boundary of the Project site. These basins would 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 stormwater runoff velocities and minimize the potential for off-site flooding of City streets and storm drains. With construction of proposed bio-retention basins and landscaping, stormwater runoff impacts would be minimized such that the Project would not result in siltation of downstream waterways, flooding of adjacent streets and storm drains, and polluted runoff. Impacts relative to existing drainage patterns would be **less than significant**, and no mitigation is required.

iv) *Impede or redirect flood flows?*

The IS prepared for the 2003 Campus Master Plan EIR determined that no impact would occur regarding 100-year flood hazard areas (SDSU 2003). The Off-Campus Center - Calexico, including the Project site, is not located within a Special Flood Hazard Area. Therefore, neither construction nor operation of the proposed Project would impede or redirect flood flows, and **no impacts** would occur relative to flood flows.

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 Campus Master Plan EIR determined that no impact would occur regarding flooding, including flooding as a result of failure of a levee or dam or inundation by seiche, tsunami, or mudflow (SDSU 2003).

Specific to the proposed Project, As discussed above under criterion (c)-iv, the Off-Campus Center - Calexico is not located within a Special Flood Hazard Area. The Project site is not located in proximity to the Pacific Ocean and would therefore not be susceptible to tsunamis. A seiche is oscillations in an enclosed body of water, such as a lake or reservoir, typically because of seismically induced ground shaking. No such bodies of water are located adjacent to the Project site; therefore, the proposed Project would not be susceptible to seiches. Since certification of the 2003 Campus Master Plan EIR, the CEQA Guidelines have been revised (per Appendix G of the 2023 CEQA Statute and 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.

For the reasons provided, neither construction nor operation of the proposed Project would risk the release of pollutants due to Project inundation. As such, **no impacts** related to pollutant release within flood hazard areas would occur.

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

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

Construction

As previously discussed, stormwater BMPs would be installed during grading and construction to minimize the potential for soil erosion and potential off-site migration of construction related pollutants. BMPs would be consistent with construction site runoff controls detailed in the SDSU Stormwater Management Plan (SDSU 2022), including good site management housekeeping, non-stormwater management, erosion controls, sediment controls, and run-on/runoff controls. After construction, the Project site would be developed with impermeable surfaces and approximately 16,000 square feet of on-site landscaping, thus eliminating the potential for soil erosion. These 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 water quality objectives contained in the Regional Water Quality Control Board's Colorado River Basin Plan and impacts from construction would be **less than significant**.

Operations

The proposed Project would be subject to the requirements of the Regional Water Quality Control Board's Colorado River Basin Plan, which outlines water quality objectives for all surface water resources within the Basin, including the nearby New River. Compliance with the Colorado River Basin Plan is implemented through waste discharge requirements for all surface water discharges, including stormwater. SDSU is enrolled under the State Water Resources Control Board Phase II Small MS4 General Permit 2013-0001 DWQ, which provides permit coverage for non-traditional MS4s, such as public campuses and is required to implement stormwater BMPs that comply with water quality objectives, including capturing and treating stormwater runoff, as discussed above (SWRCB 2024). The Project would include construction of numerous biofiltration features and landscaping, which would ensure that the Project is consistent with the Colorado River Basin Plan's water quality objectives.

Further, groundwater would not be used as a water source for the Project. Therefore, the Project would not conflict with or obstruct implementation of the Colorado River Basin Plan or a Groundwater Sustainability Plan (under the Sustainable Groundwater Management Act). As a result, **no impacts** would occur.

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"/>

The 2003 Campus Master Plan EIR and IS determined that no impact related to physical division of an established community would occur as a result of buildout of the Imperial Valley Campus Master Plan at the Calexico site. The EIR further determined that development at the Off-Campus Center - Calexico would be limited to the existing urban campus, which is integrated with the surrounding community, and the Master Plan expansion would be compatible with adjacent existing development in the City and land use plans. Therefore, no impacts would occur.

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

The proposed Project includes a four-building complex that would provide affordable student housing on the existing Off-Campus Center - Calexico. The proposed Project would further implement buildout of the Calexico Master Plan as analyzed in the 2003 Campus Master Plan EIR and would be consistent with the existing educational uses. The Project is located within the existing CSU Off-Campus Center Calexico and does not include construction of a new roadway or rail lines that could divide an existing community. For these reasons, 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?*

As previously noted in Chapter 2, as a state agency, the CSU/SDSU is not subject to local land use plans, policies, or regulations. For information purposes, the Project site is zoned by the City as Open Space (City of Calexico 2021).

Although not subject to local government planning and regulations, in the interest of transparency and for information purposes, the CSU/SDSU may consider a project’s consistency with local plans and policies of those jurisdictions that surround campus locations, as appropriate. The Project site is designated Public Facilities in the City’s General Plan and zoned Open Space (City of Calexico 2015a, 2021). Implementation of the proposed Project would be consistent with the land use designation and zoning of the site. The proposed affordable student housing complex would be sited generally within the footprint of Building 21,

as identified on the Imperial Valley Campus Master Plan and previously analyzed in the 2003 Campus Master Plan EIR (see Figure 3A). To the extent any adjustments may be necessary to the Master Plan to accommodate the proposed Project, a Minor Modification would be processed by the CSU as part of the proposed Project approvals. Implementation of the proposed Project would be consistent with both the local government’s existing land use designation and zoning of the site. Further, as determined through 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. 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 and 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"/>

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

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 Imperial County General Plan’s Conservation and Open Space Element does not identify the Project site as containing existing mineral resources (County of Imperial 2016). The City of Calexico General Plan does not identify locations where mineral resources may be present (City of Calexico 2015a). Because 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?

As stated above under criterion (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 checked="" type="checkbox"/>	<input 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 Campus Master Plan 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 also 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 EIR focused on an assessment of potentially significant temporary or permanent increases to outdoor ambient noise levels. The analysis presented below is based on the Noise Technical Memorandum prepared by Dudek, included in its entirety as Appendix I to this IS and incorporated herein by this reference. A summary of the prior analysis, including significance determinations and mitigation, if applicable, is provided below, along with analysis specific to the present proposed Project.

- 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?*

On-Site Construction Noise (Temporary)

The 2003 Campus Master Plan EIR does not provide predicted construction noise levels for the proposed Project site but does establish that construction activities would be of a “lesser degree” than the construction of the Brawley Campus site (SDSU 2003). Table 3.9-1 of the 2003 Campus Master Plan EIR identifies predicted construction noise levels at the Brawley Campus site, where construction equipment would operate at a nearest distance of 300 feet from noise-sensitive receptors. No impacts associated with the construction of the proposed Brawley Campus site were expected.

Using a Roadway Construction Noise Model-emulating Excel workbook, the predicted noise level exposures from the proposed construction activities at the nearest studied residential noise-sensitive receptor are summarized in Table 10. The nearest residential noise-sensitive receptor is represented by the outdoor ambient noise measurement location ST4 (as shown in Table 5) and is the closest distance to each construction phase area on the Project site. Although the prediction results in Table 10 are presented as 8-hour energy equivalent continuous sound level (L_{eq}) values, they are essentially equivalent to hourly L_{eq} values because construction equipment would operate 8 hours during a typical work shift within the City’s established construction period (see Table 10 of Appendix I).

Table 10. On-Site Construction Noise Model Results Summary without Mitigation (Noise-Sensitive Receptor at ST4 - Residence)

Construction Phase (from Table 9 of Appendix I)	Construction Noise (dBA 8-hour L_{eq}) at ST4* - Nearest Residential Noise-Sensitive Receptor			
	Construction Noise Levels	Exceed City’s 75 dBA 8-hour L_{eq} Threshold? (Yes/No)	Existing Noise Levels at ST4*	Temporary Noise Level Increase
Site Preparation	75.6	Yes	59.5	16.1
Grading	75.6	Yes		16.1
Building Construction	76.9	Yes		17.4
Paving/Architectural Coating	75.0	Yes		15.5

Source: See Attachment C of Appendix I for complete results.

Notes: dBA = A-weighted decibel; L_{eq} = energy equivalent continuous sound level.

* Measured outdoor ambient noise levels at measurement location ST4 can be found in Table 5 in Appendix I, Noise Technical Memorandum.

Project construction noise at the nearest noise-sensitive receptor would be higher than the measured ambient levels of the Project site (see Appendix I, Table 5, Measured Baseline Outdoor Ambient Noise Levels), so nearby sensitive receptors may experience temporary noise level increases of up to 24.6 A-weighted decibels (dBA). The predicted construction noise levels at the noise-sensitive receptor appearing in Table 10 would exceed the City’s 75 dBA 8-hour L_{eq} threshold if mitigation is not incorporated. Table 11 shows the predicted noise level exposures from the proposed construction activities at the nearest studied noise-sensitive receptor with a 6-foot-tall temporary construction noise barrier incorporated.

Table 11. On-Site Construction Noise Model Results Summary with Mitigation (Noise-Sensitive Receptor - Residence)

Construction Phase (from Table 9 of Appendix I)	Construction Noise (dBA 8-hour L_{eq}) at ST4* - Nearest Residential Noise-Sensitive Receptor			
	Construction Noise Levels	Exceed City's 75 dBA 8-hour L_{eq} Threshold? (Yes/No)	Existing Noise Levels at ST4*	Temporary Noise Level Increase
Site Preparation	73.4	No	59.5	13.9
Grading	73.4	No		13.9
Building Construction	74.6	No		15.1
Paving/Architectural Coating	72.8	No		13.3

Source: See Attachment C of Appendix I for complete results.

Notes: dBA = A-weighted decibel; L_{eq} = energy equivalent continuous sound level.

* Measured outdoor ambient noise levels at measurement location ST4 can be found in Table 5 in Appendix I, Noise Technical Memorandum.

Implementation of MM-NOI-1 would require SDSU, prior to the commencement of construction activities, to direct the contractor to install a 6-foot-tall temporary construction noise barrier along the southern and eastern Project boundaries to remain in place throughout the entire construction process. As a result, all predicted construction noise levels at the noise-sensitive receptor identified in Table 11 would be below the City's 75 dBA 8-hour L_{eq} threshold. On this basis, and with a 6-foot-tall temporary construction noise barrier incorporated during Project construction, construction noise levels would be **less than significant with mitigation incorporated**.

Mitigation Measure

The following mitigation measure would reduce the potential for direct and indirect impacts noise impacts during construction by requiring installation of a temporary construction noise barrier. Implementation of the following mitigation measure would reduce potential impacts to a **less-than-significant level**.

MM-NOI-1: Prior to the commencement of construction activities, the CSU/SDSU, 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.

Operation Noise

Roadway Traffic Noise

The 2003 Campus Master Plan EIR states that buildout of the Master Plan for Calexico would produce an additional 830 average daily trips (ADT) to an estimated existing 5,000 ADT based on field observations performed by ISE (SDSU 2003). The Project-related 830 ADT trip generation would increase traffic noise levels within a range of 0.5 to 1 dBA CNEL (Community Noise Equivalent Level), which would not constitute a significant impact, and aggregate levels would fall below the 65 dBA CNEL that is compatible for the proposed campus expansion (SDSU 2003).

The proposed Project would not increase student enrollment above what was evaluated in the 2003 Campus Master Plan EIR; therefore, substantial changes to localized traffic patterns beyond what was analyzed in the EIR are not anticipated (see Appendix I). Any traffic related to the proposed Project would be traffic generated by those IVCCD students commuting to school, or incidental work or personal trips by SDSU Calexico students.

Table 12 summarizes the predicted increases in traffic noise attributable to the Project along adjacent roadways (Blair Avenue and East 7th Street). As shown in Table 12, roadway traffic noise attributable to the proposed Project would not increase existing traffic noise levels by more than 3 dBA CNEL (which is not discernable to the human ear); therefore, impacts would be **less than significant**.

Table 12. Traffic Noise Levels with and without Project

Street Name	From	To	Noise Level without Project (dBA CNEL)	Noise Level with Project (dBA CNEL)	Project Increase (dBA CNEL)
Blair Avenue	East Sherman Street	East 7th Street	56.4	56.5	0.1
East 7th Street	Blair Avenue	Giles Avenue	54.9	55.2	0.3
East 7th Street	Heber Avenue	Blair Avenue	55.2	55.5	0.3

Source: Appendix I, Noise Technical Memorandum.

Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level.

Additionally, the CNEL values appearing in Table 12 suggest that corresponding hourly L_{eq} values associated with roadway traffic noise after the Project is operational would not exceed the City’s daytime (7:00 a.m. to 10:00 p.m.) or nighttime (10:00 p.m. to 7:00 a.m.) interior noise thresholds of 45 dBA and 35 dBA L_{eq} , respectively. For example, the occupant of a housing unit facing Blair Avenue with a partially open window would experience a 15-decibel reduction from exterior to interior traffic noise intrusion, or a 25-decibel reduction with a closed window. Thus, an exterior traffic noise level of 56.5 dBA hourly L_{eq} (existing plus Project noise) along Blair Avenue would be reduced to an interior noise level of 41.5 dBA hourly L_{eq} when a window is partially open, or 31.5 dBA hourly L_{eq} when a window is closed.

After applying these same exterior-to-interior decibel reductions attributed to building sound insulation, both predicted scenario noise levels appearing in Table 12 would be below the City’s 45 dBA CNEL interior noise limit during daytime hours, and during nighttime hours, interior noise levels would likely be even lower because the California Department of Transportation (Caltrans) assumes that 15% of average daily traffic would occur at night (Caltrans 2013). Therefore, a potential exterior-to-interior traffic noise intrusion impact would be **less than significant**.

Stationary Sources

Predicted noise exposure levels attributed to concurrent operation of the proposed Project on-site stationary sources (i.e., heating, ventilation, and air conditioning systems) as modeled appear in Table 13. As shown on Table 13, the predicted noise levels at the studied noise-sensitive receptor locations would not exceed the City’s exterior noise level threshold for single-family residential land uses (at the property line) of 50 dBA hourly L_{eq} during daytime hours (7:00 a.m. to 10:00 p.m.) or 40 dBA hourly L_{eq} during

nighttime hours (10:00 p.m. to 7:00 a.m.); therefore, potential noise impacts associated with Project operation would be **less than significant**.

Table 13. Project Operation Noise Prediction Model Results Summary

Modeled Receptor	Modeled Property Line Receptor Distance from Project Boundary	Predicted Operation Noise (dBA hourly L_{eq}) at Indicated Modeled Property Line Receptor
R1	85 feet northeast	19.6
R2	85 feet east	21.4
R3	85 feet east	23.6
R4	90 feet south	32.8
R5	100 feet south	29.3

Source: Appendix I, Noise Technical Memorandum.

Note: R = Receptor; dBA = A-weighted decibel; L_{eq} = energy equivalent continuous sound level.

For additional information and details, see Appendix I, Figure 6, Predicted Stationary Source Operation Noise from Proposed Project.

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

On-Site Construction Activities

Construction, groundborne vibration velocity levels attributed to anticipated on-site usage of a dozer, loader, and vibratory roller were calculated at the nearest off-site noise-sensitive receptor to the construction of the Project.

For example, the Project’s paving phase would occur as close as 95 feet to the western façade of the nearest off-site receptor along Blair Avenue. At this distance, and using a reference groundborne peak particle velocity (PPV) of 0.21 inches per second (ips) for the roller at a distance of 25 feet, the estimated PPV at the receiving building façade and likely closest interior occupied space can be estimated as follows:

$$PPV_{rcvr} = 0.21 * (25/95)^{1.5} = 0.028 \text{ ips}$$

As shown in Table 14, predicted groundborne vibration velocity levels are below the Caltrans guidance-based 0.3 ips PPV threshold for avoiding building damage to older residential structures and the 0.2 ips PPV threshold for occupant annoyance.

Subsequent on-site construction activities would involve greater quantities of equipment but would be less vibratory than a roller and/or their distances to the studied sensitive receptors would be much greater. Hence, groundborne vibration generated from these more distant or lower magnitude sources of on-site vibration would be substantially less than the estimates in Table 14 and the Caltrans guidance-based vibration exposure thresholds. Therefore, on the basis of compliance with these standards, impacts associated with construction vibration would be **less than significant**.

Table 14. Predicted On-Site Construction Vibration at Nearest Noise-Sensitive Receptor

Studied Receptor (Description)	Anticipated Vibration Source Closest Distance (feet)	Predicted PPV (ips) and VdB (rms) for Indicated Equipment Type					
		Dozer		Loader		Roller	
		PPV	VdB	PPV	VdB	PPV	VdB
Residence 95 feet East along Blair Avenue	95	0.012	70	0.012	70	0.028	77

Source: Appendix I, Noise Technical Memorandum.

Note: PPV (ips) = peak particle velocity (inches per second); VdB (rms) = vibration decibels (root mean square).

- 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 Calexico International Airport is approximately 6,000 feet, or 1.15 miles from the Project site. The Compatibility Map for Calexico International Airport shown in the Imperial County General Plan Noise Element does not provide noise contours (County of Imperial 2015). However, the Calexico International Airport is not a major airport, and due to the distance of approximately 1.15 miles from the Project site, construction workers and post-construction Project operational or maintenance staff on site are not likely be exposed to excessive noise levels. Thus, there would be a **less-than-significant** impact associated with aviation noise levels.

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"/>

The 2003 Campus Master Plan EIR evaluated buildout of the Off-Campus Center - Calexico with a total FTE of 850 students at the Calexico site. The IS prepared for the EIR determined that the increase of 250 students over existing

enrollment levels would be within the established goals of the Campus Master Plan. As a result, the EIR determined that impacts related to substantial unplanned population growth would be less than significant. Similarly, the IS prepared as part of the 2003 Campus Master Plan EIR determined that there would be no displacement of people or housing and, therefore, no impacts would occur.

- 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 proposed Project would involve the construction and operation of a four-building complex that would provide affordable student housing on the Calexico site. As discussed in Chapter 2, the proposed Project would result in the addition of 80 student beds and would serve the existing Calexico student population and IVCCD Imperial Valley College students and would not increase enrollment above previously approved levels. The live-in manager unit would be occupied by an on-site manager, which would result in the employment of one new SDSU staff member in addition to the previously analyzed and approved existing faculty/staff. The new staff member would likely come from the existing surrounding communities and, in any event, would not constitute “substantial unplanned population growth” in the area.

The students and new staff member that would live and work at the proposed Project are reasonably assumed to currently reside in the surrounding communities, including in the City. The Project would not result in the construction of any new homes, businesses, or infrastructure that would otherwise induce population growth. Because the proposed Project would not increase and/or exceed enrollment beyond the previously analyzed and approved 850 FTE students, implementation of the proposed Project would be consistent with the findings of the 2003 Campus Master Plan 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 proposed Project would involve the construction and operation of a four-building complex that would provide affordable student housing at the Off-Campus Center - Calexico. The Project site consists of vacant and undeveloped land with two trees located along the northern boundary of the site and a chain-link fence that separates the Project site from the recently removed temporary Campus Buildings 201, which were located immediately west of the Project site. Other existing uses surrounding the Project site include an administrative building and surface parking lot to the north, Blair Avenue to the east, and East 7th Street to the south. There is no existing housing within the Calexico site. The proposed construction staging area for the Project would be sited within undeveloped portions of the school site, generally within the location of future Building 21, as identified on the Campus Master Plan. Because there is no existing housing at the Off-Campus Center - Calexico 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
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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"/>

Impacts related to public services were evaluated in the IS and Section 3.7 of the 2003 Campus Master Plan EIR. The IS and EIR determined that the expansion of the Off-Campus Center - Calexico would not result in significant environmental impacts related to public services. A summary of the prior analysis included in the IS and 2003 Campus Master Plan EIR is provided below along with the current Project-specific analysis for each criterion.

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 Campus Master Plan EIR determined that buildout of the Master Plan at the Off-Campus Center – Calexico would not substantially increase demand for City fire protection services and no impact would occur.

As to the presently proposed Project, the 2003 EIR noted that fire protection services at the Project site are provided by the City of Calexico Fire Department, which has two fire stations, one at 415 East 4th Street (Station 1) and another at 900 Grant Street (Station 2) (City of Calexico 2020a). Station 1 is located approximately 725 feet southwest of the Project site. If needed, the City of Calexico Fire Department maintains a significant emergency response resource directory and has mutual aid agreements with other governmental agencies in order to gain access to specialized equipment and resources (City of Calexico 2020a).

The Project site is located within an area mapped as a Local Responsibility Area by CAL FIRE (2022). The “Local Responsibility Area” designation means that fire response services for the Project site are within the responsibility of a local, rather than state agency—in this case, the City of Calexico Fire Department—although the Off-Campus Center - Calexico is located on state property. As to the hazard severity designation, the entire campus is located within a non-wildland/non-urban area and not identified by CAL FIRE as within a mapped Fire Hazard Severity Zone. The nearest mapped High or Very High Fire Hazard Severity Zones are located

approximately 30 miles southwest and 55 miles northwest of the Project site (CAL FIRE 2022). Please see Section 3.20 of this IS for additional information regarding fire protection services.

The proposed Project would involve construction and operation of a four-building complex that would provide affordable student housing. As described in Section 3.14, Population and Housing, of this IS, the proposed Project would result in the addition of 80 student beds on campus and would not increase student enrollment beyond previously approved levels. Although students would spend more time on campus, which could result in a slight increase in calls for service than under existing conditions, this potential increase in calls for service would not be substantial. Therefore, the proposed Project would not substantially increase the demand for fire protection services requiring the provision of, or need for, new or physically altered fire protection facilities. Therefore, impacts would be **less than significant**.

Police protection?

The 2003 Campus Master Plan EIR determined that buildout of the SDSU Imperial Valley Campus Master Plan at Calexico would not substantially increase demand for police protection services, and no impact would occur.

Police protection services at the Project site are provided by the City of Calexico Police Department located at 420 East 5th Street within the City, approximately 770 feet southwest of the Calexico site. The City of Calexico Police Department is the primary reporting and investigating agency for crimes occurring on the SDSU Calexico property. The campus does not have its own police department.

As described in Section 3.14 of this IS, the proposed Project would provide housing for previously approved enrollment; as such, the Project would not increase student enrollment above prior approved levels. Although operation of the Project would result in students spending more time on campus, which could result in a slight increase in calls for service than under existing conditions, this potential increase in calls for service would not be substantial. As such, the proposed Project would not substantially increase the demand for police services beyond that considered in the 2003 Campus Master Plan 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 2003 Campus Master Plan EIR determined that buildout of the SDSU Imperial Valley Campus Master Plan at Calexico would increase the City's higher education opportunities but would not result in an increased demand for schools because it would not involve an increase in permanent new residents or generate an increase in school student enrollment. As a result, no impact would occur.

As to the present proposed Project, the Off-Campus Center - Calexico is located within the Calexico Unified School District, which serves K-12 students (CUSD 2024). The proposed Project would provide housing for previously approved enrollment and would result in one new staff member (on-site management) that would serve and support the students. Even assuming the one new additional staff member has a family 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 2003 Campus Master Plan EIR determined that buildout of the Off-Campus Center - Calexico would not remove any existing recreational areas and no impacts related to the provision of or need for new or physically altered park facilities would occur.

The City owns and maintains 22 parks totaling 60 acres, or approximately 1.7 acres per 1,000 residents. In addition, the City operates 122 acres of open space (City of Calexico 2020b). The closest City-owned park to the Project site is Rockwood Plaza, which is located adjacent to the Project site across East 7th Street, approximately 200 feet southwest. The proposed Project would provide student housing for 80 students, although not increase SDSU Calexico and IVCCD enrollment above previously approved levels; however, students would spend more time on campus, which could result in the increased use of recreational facilities in the Project area than under existing conditions. This potential increase in use of recreational facilities would not be substantial and would not substantially increase the demand on parks within the Project area resulting in a need for new or physically altered park facilities; therefore, impacts would be **less than significant**.

Other public facilities?

The 2003 Campus Master Plan EIR determined that buildout of the SDSU Imperial Valley Campus Master Plan at Calexico would not result in an increased demand for library facilities (or other public facilities) as the Off-Campus Center - Calexico provides library and reference resources for students and, therefore, no impact would occur.

As to the present proposed Project, which would provide student housing and not increase enrollment above previously approved levels, although, students would spend more time on campus than under existing conditions, which could result in increased demand of library services. Students enrolled at SDSU Calexico would likely use campus-provided library services, whereas IVCCD students likely would use IVCCD library services. Accordingly, any potential increase in demand for public library services would not be substantial and would not require 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"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

The IS prepared for the 2003 Campus Master Plan EIR determined that buildout of the Imperial Valley Campus Master Plan and the Calexico site expansion would not remove any existing recreational facilities and would not increase demand on campus for existing recreational facilities. As such, no impact would occur.

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?*

As to the proposed Project, the City owns and operates 22 parks totaling 60 acres, or approximately 1.7 acres per 1,000 residents. In addition, the City operates 122 acres of open space (City of Calexico 2020b). The closest City-owned park to the Project site is Rockwood Plaza, which is located adjacent to the Project site across East 7th Street, approximately 200 feet southwest. Imperial County operates eight parks and recreational facilities within the County (County of Imperial 2024). The nearest County-owned park is the Heber Community Center, located at 1132 Heber Avenue, Heber, California 92249, approximately 4.75 miles northwest of the Project site (County of Imperial 2024).

The proposed Project would provide student housing on the Off-Campus Center - Calexico. As discussed in Section 3.14, in addition to one new staff member, the Project would result in a less-than-significant impact related to population increase because the Project would serve and support the previously approved student enrollment; as such, the Project would not increase student enrollment above prior approved levels. Although operation of the Project would result in students spending more time on campus, which could result in an increase in demand on recreational facilities, this potential increase in demand would not substantially increase demand on parks within the City or Imperial County such that substantial physical deterioration of existing facilities would occur or be accelerated. Therefore, impacts 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?*

As described above, the proposed Project would result in the addition of one new staff member that would serve and support the previously approved students; as such, the Project would not increase student enrollment above prior approved levels. Although the Project would result in students spending more time on campus, which could result in a slight increase in demand on recreational facilities, this potential increase in demand would not be substantial.

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"/>
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 checked="" type="checkbox"/>	<input 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 Transportation Impact Analysis prepared for the 2003 Campus Master Plan EIR analyzed the potential traffic impacts associated with 850 FTE students commuting to and from the Off-Campus Center - Calexico. The Transportation Impact Analysis and EIR determined that there would be no significant transportation impacts as a result of development of the Calexico Campus Master Plan. The Transportation Impact Analysis concluded that there would be no construction-related impacts or Project-related impacts during operation and no mitigation measures were required or identified in the 2003 Campus Master Plan EIR or IS. The analysis presented below is based on the Transportation Assessment prepared by Dudek, included in its entirety as Appendix G to this IS and incorporated herein by this reference.

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 consistent with the previously approved Campus Master Plan, which is the governing document regulating development on the Off-Campus Center - Calexico. The Project would be built generally on the site of Future Building 21, as shown on the approved Campus Master Plan (see Figure 3A). The proposed Project does not include any modifications to the City’s circulation system, including transit, roadway, bicycle, or pedestrian facilities, outside the campus boundaries.

Although the Project falls under the purview of the CSU and would not directly affect the City’s Circulation Element, the Project would not preclude implementation of any City-related goals and policies. Additionally, it would provide Calexico students easy access to the Off-Campus Center - Calexico and reduce the need for vehicular trips, as well as facilitate use of alternative modes such as walking and biking.

The proposed Project would not conflict with the existing transit system. Near the proposed Project, Imperial Valley Transit Route 1 N runs north-south and serves the Imperial Avenue Corridor from the City to El Centro and has a stop at Encinitas and East 7th Street. Route 1 N operates weekdays and weekends. Imperial Valley Transit Route 21 also runs north-south on the Imperial Avenue Corridor between the City and Imperial Valley College. Route 21 operates during the academic calendar of Imperial Valley College. The nearest bus stops (for Routes 1N and 21) are located at Encinitas Avenue and East 7th Street, approximately 0.2 miles from the Project site. Construction of the proposed Project would not affect existing and planned transit operations.

As to pedestrian and bicycle facilities, there are existing sidewalks along both sides of Blair Avenue and East 7th Street adjacent to the Project site. There are no Class II marked bike facilities along roadways near the proposed Project. The Project would use existing driveways along East Sherman Street to access the complex and would not impede the function of any existing campus or City pedestrian or bicycle facilities and, in fact, would facilitate bicycle travel by providing 15 bike racks as part of the Project.

Any transportation-related improvements constructed as part of the proposed Project would be constructed on site and would be consistent with the Campus Master Plan and any applicable CSU policies. Moreover, the Project would not preclude implementation of any City plans or policies regarding existing or proposed roadways or bicycle or pedestrian facilities in the area. As such, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts 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) focuses on VMT for determining the significance of transportation impacts. The Guidelines define VMT as “the amount and distance of automobile travel attributable to a project.” “Automobile” refers to on-road passenger vehicles, specifically cars and light trucks. The Governor’s Office of Planning and Research has clarified in its Technical Advisory (OPR 2018) that heavy-duty truck VMT is not required to be included in the estimation of a project’s VMT.

The Project proposes a total of 82 beds, including 40 affordable housing student beds for students of the Off-Campus Center - Calexico, 40 student beds for students of the Imperial Valley College, and a two-bedroom live-in manager unit. VMT-related impacts attributable to the SDSU Calexico students and the Imperial Valley College students are each addressed separately below.

Calexico Off-Campus Center Students

With respect to the 40 student beds that would be occupied by students of the Off-Campus Center - Calexico, as previously noted, vehicle trips associated with these students were previously analyzed in the 2003 EIR, and, therefore, no further analysis of traffic impacts associated with these students is required under CEQA. Moreover, we note that per the CSU Transportation Impact Study Manual, on-campus housing serving students, faculty, and staff is included in the list of projects screened from required project-level VMT assessment such that no analysis of VMT-related impacts is necessary. This is because those students attending the Off-Campus Center - Calexico would not generate daily vehicular trips commuting back and forth to school because they would be residing on-campus. Further, rather than adding VMT to the roadway network, a certain number of vehicle trips would be removed from the network as a result of the Project as

those students who previously commuted to school would no longer need to do so, thereby reducing rather than increasing VMT.

Although some new trips for the purposes of shopping or recreation would occur, based on typical student practice and finances, it is reasonable to assume that students would carpool, bike, or use transit, thereby further reducing VMT. Finally, it also is noted that the proposed Project would be restricted as affordable housing, and, therefore, offered only to students of families of very-low- or low-income. As such, and consistent with relevant data, it is anticipated that there would be a low rate of car ownership among these students, further resulting in reduced trips and related VMT.

In conclusion, any vehicle trips that would be generated by the 40 students attending SDSU Calexico were previously accounted for and analyzed in the 2003 EIR and no further analysis is necessary. Further, even assuming VMT analysis was required, although there would be nominal new student trips and related VMT generated by the 40 SDSU students and one SDSU staff occupying the proposed Project beds, the proposed Project would result in reducing VMT as students would no longer need to commute to school. Lastly, because the Project housing would serve students included in the FTE students analyzed in the 2003 EIR, the Project would be consistent with the RTP. Therefore, impacts related to VMT generated by SDSU Calexico students would be less than significant.

Imperial Valley College Students

As to the 40 student beds that would be occupied by Imperial Valley College students, these students would commute to the Imperial Valley College site from the proposed Project site and would generate new vehicle trips at the Project site. The Imperial Valley College is approximately 11.5 miles from the site of the proposed Project. However, when considering both vehicle trips and VMT, it is noted that these Imperial Valley College students are already generating existing trips and VMT by commuting from their homes in nearby Imperial and El Centro, as well as other parts of Imperial County, to attend the community college. Therefore, these students would not be generating new trips but, instead, would generate the same number of trips but with a different origin. Also to be considered is the increased likelihood that students would carpool back and forth to the community college because they would now be living in the same residence. Therefore, at the county or regional level, in Dudek's professional judgment the net change in trip length would not be substantial.

Additionally, the number of vehicle trips generated by the Imperial Valley College students would meet a different project screening criteria provided for in the CSU Transportation Impact Study Manual by generating less than 110 vehicle trips per day.⁷ To calculate the number of vehicle trips that would be generated by the 40 Imperial Valley College students, the trip rate for off-campus student housing provided in the Institute of Transportation Engineers Trip Generation Handbook, 11th Edition (ITE 2021), was applied to the 40 students. Note that this rate is considered conservative under the circumstances in that it is not for affordable student housing, which statistically would generate fewer vehicle trips than standard student housing.

As shown below in Table 15, the proposed student housing for the Imperial Valley College students is estimated to generate 79 ADT, with three AM peak-hour trips and six PM peak-hour trips.

⁷ Projects generating less than 110 vehicle trips per day are presumed to result in a less-than-significant impact. See the California State University Transportation Impact Study Manual (2019), pp. 11-12.

Table 15. Imperial Valley College Student Trip Generation

Land Use	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Generation Rates¹								
Off-Campus Student Apartment (low-rise) 0.5 miles from Campus	Bedrooms	3.97	0.04	0.12	0.16	0.16	0.15	0.31
Trip Generation								
Housing for Imperial Valley College Students	20 Bedrooms ²	79	1	2	3	3	3	6

Source: Appendix G, Transportation Assessment.

Notes:

- ¹ Trip rates from Institute of Transportation Engineers Trip Generation Manual, 11th Edition, 2021.
- ² The Project consists of three residential buildings, including two student housing buildings with 40 student beds each. Each student housing building includes five four-bedroom for a total of 80 student beds. The trip generation is estimated only for 40 student beds that would be allocated to the Imperial Valley College. The Institute of Transportation Engineers trip rate is per bedroom, and the trip rate has been established per bedroom unit, which could include two to five beds. Therefore, conservatively assuming each bedroom would have two beds, the trip generation has been estimated for 20 bedrooms (40 beds ÷ 2 beds per bedroom).

Therefore, the student housing proposed for the Imperial Valley Community College students and the on-site manager would meet the Project screening criteria by generating less than 110 vehicle trips per day, and impacts related to VMT would be less than significant. The proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be **less than significant**

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 involve construction of three residential buildings and one community building and use existing roadways and driveways for access and circulation. The rectangular grass lawn on the northwest corner of East 7th Street and Blair Avenue would be used as a construction staging area. The Project would maintain vehicular access to the site via an existing entrance on East Sherman Street via an existing parking lot. This parking lot is shown on Figure 4, north of the Physical Plant Building.

During construction, it is anticipated that temporary sidewalk and lane closures would be required on the westside of Blair Avenue and the northside of East 7th Street. To ensure access to all road users during construction and to reduce potential hazard impacts associated with construction activities, MM-TRA-1 is proposed, which would require preparation and implementation of a traffic control plan during construction activities. Implementation of the traffic control plan would reduce any potential impacts related to hazards to less than significant.

The Project would not introduce incompatible uses or other hazards associated with Project operations. Therefore, with implementation of MM-TRA-1, potential impacts associated with a hazardous geometric design feature, or incompatible uses would be **less than significant with mitigation incorporated**.

The following mitigation measure would reduce the potential for direct and indirect impacts during Project construction activities to pedestrians, bicyclists, motorists, and emergency vehicles by requiring preparation

of a traffic control plan consistent with Caltrans guidelines to ensure the safety of these interests. Implementation of the mitigation measure would reduce potential impacts to **less-than-significant**.

MM-TRA-1: Prior to the commencement of construction activities, the CSU/SDSU, or its designee, shall prepare a traffic control plan, consistent with guidelines available through the California Department of Transportation, to ensure the safe passage of pedestrians, bicyclists, motorists, and emergency vehicles in the immediate vicinity of construction activities. The traffic control plan shall be implemented during Project construction activities and shall be discontinued upon completion of Project construction.

d) Would the project result in inadequate emergency access?

Construction of the proposed Project may require temporary road closures in public rights-of-way on Blair Avenue and East 7th Street. As mentioned above, a traffic control plan would be implemented to provide access to all road users during construction, and to prevent interference with emergency response vehicles. The Project would be designed and constructed to state standards and would ensure emergency access would be maintained during construction, per the requirements of the City’s fire department. Upon completion, the Project site would continue to be accessible via the existing driveway on East Sherman Street. Therefore, construction and operation of the proposed Project would not result in inadequate emergency access and impacts 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"/>

Impacts related to tribal cultural resources and the requirements for consultation between lead agencies and California Native American Tribes were introduced as part of the CEQA Guidelines in 2015, with the implementation of AB 52. As such, the tribal cultural resources questions included in Appendix G of the CEQA Guidelines were not previously evaluated in the 2003 Campus Master Plan EIR or IS. The analysis presented below is based on the Cultural Resources and Tribal Cultural Resources Technical Memorandum prepared by Dudek, included in its entirety as Appendix D to this IS and incorporated herein by this reference.

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.***

Dudek's cultural resources inventory of the site of the proposed Project included a records search, archival research, a search of the NAHC Sacred Lands File, and a pedestrian survey. The South Coast Information Center records search and pedestrian survey did not identify any cultural resources within the Project area.

A search of the NAHC Sacred Lands File was conducted and the NAHC responded with results indicating the potential presence of relevant resources within the geographic area. The NAHC also provided a list of Native American Tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area. A copy of the NAHC contact list is included in Appendix D. Dudek sent outreach letters to all Native American group representatives included on the NAHC contact list on July 19, 2024. These letters request additional information relating to tribal cultural resources or other Native American resources that may be impacted by construction or operation of the Project. To date, no responses have been received.

In compliance with AB 52, the 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 NAHC recommended tribes on July 26, 2024. SDSU received responses from the Campo Band of Mission Indians and the Viejas Band of Kumeyaay Indians. The Viejas Band of Kumeyaay Indians responded via email on August 1, 2024 and stated that should a Kumeyaay tribe in closer proximity to the Project site request to provide Kumeyaay Cultural Monitoring Services, Viejas Band of Kumeyaay Indians would defer to them. Campo Band of Mission Indians responded to the AB 52 notification and requested consultation. Because Campo Band of Mission Indians are in closer proximity to the Project site, Viejas Band of Kumeyaay Indians deferred to Campo Band of Mission Indians.

A virtual meeting between representatives of CSU/SDSU and the Campo Band of Mission Indians was held on August 26, 2024. During the AB 52 consultation meeting, Campo Band of Mission Indians did not identify any tribal cultural resources within the Project area. Although consultations with the Campo Band of Mission Indians did not uncover the presence of tribal cultural resources in the Project area, the potential exists that such resources may be uncovered during Project construction.

To mitigate any potential significant impacts related to tribal cultural resources, the following mitigation measure TCR-1 is recommended to reduce potential impacts to tribal cultural resources to **less than significant**. Campo Band of Mission Indians and Viejas Band of Kumeyaay Indians reviewed and approved of mitigation measure TCR-1.

Mitigation Measures

The following mitigation measure would reduce potential impacts relating to unanticipated discoveries to a less-than-significant level. See section 3.5, Cultural Resources, of this IS for a discussion of cultural resources.

MM-TCR-1:

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.

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.

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.

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.

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 type="checkbox"/>	<input checked="" 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"/>

Impacts related to utilities and service systems were evaluated in Section 3.7, Public Services/Utilities; Section 3.8, Hydrology; and Section 3.11, Water Quality, of the 2003 Campus Master Plan EIR. The 2003 Campus Master Plan EIR determined that the expansion of the Off-Campus Center - Calexico would not result in environmental impacts related to utilities and service systems. A summary of the prior analysis is provided below along with the current Project-specific analysis for each criterion.

- 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 Campus Master Plan EIR. Impacts related to new stormwater drainage facilities were evaluated in Section 3.8, Hydrology, and Section 3.11, Water Quality, of the EIR. The EIR determined that the expansion of the Off-Campus Center - Calexico would not result in environmental impacts regarding new or expanded wastewater, storm drain, and electric power facilities because the existing uses on site would not change and impacts were determined to be less than significant.

As discussed in further detail below, the present proposed Project would require new points of connection for water, wastewater, electric power, and telecommunications from existing utility lines/facilities to serve the new affordable student housing complex. 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. Analysis of the potential impacts associated with the related infrastructure improvements is provided below.

Water

The proposed Project would be located within the City, and potable water is currently provided to the Project site by the City. The proposed Project would require new on-site water infrastructure, such as water mains and laterals, which would connect to an existing water main in East 7th Street. The required connections to off-site municipal infrastructure would be completed in coordination with the City's Department of Public Works. Installation of the 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, BMPs for protecting stormwater runoff from sediment and erosion would be implemented. 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. Although the Project would require the installation of distribution water piping and connection to an existing off-site water main, the Project 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 or sewer collection, treatment, and disposal services. The Project would require connections to existing City infrastructure located within Blair Avenue in coordination with the City/Department of Public Works. The 2003 Campus Master Plan EIR determined that buildout of the Off-

Campus Center - Calexico would not generate a substantial increase in demand that would exceed the capacity of existing conveyance and treatment infrastructure that could result in a significant impact.

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 Small MS4 General Permit, BMPs for protecting stormwater runoff from sediment and erosion would be implemented. 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. Therefore, there is adequate, existing wastewater infrastructure to serve the Project, and Project implementation would not result or require construction of new or expanded wastewater treatment facilities off site. The Project would have a **less-than-significant impact** related to the relocation or construction of new or expanded wastewater facilities.

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 City's existing storm drain infrastructure. 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 stormwater that would exceed the capacity of existing or planned stormwater systems. 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 Small MS4 General Permit and the SDSU Stormwater Management Plan. Stormwater BMPs would be installed during grading and construction to minimize the potential for soil erosion and potential off-site migration of construction related pollutants. BMPs would be consistent with construction site runoff controls detailed in the SDSU Stormwater Management Plan (SDSU 2022). 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 stormwater 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.

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 solar-ready design features that would facilitate and optimize the future installation of a photovoltaic solar system. As stated in the 2003 Campus Master Plan EIR, the

increase in electrical demand would not be substantial and it would not have a significant impact on the IID's ability to provide electricity to the area and impacts were determined to be less than significant.

The Project would connect to on-site electrical power infrastructure via an existing 12kV, three phase, three wire, 60 Hertz overhead line routed along East 7th Street. Underground service throughout the proposed complex would be provided from a utility pad-mounted transformer. Construction to connect to the 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. Stormwater BMPs would be installed during grading and construction to minimize the potential for soil erosion and potential off-site migration of construction related pollutants. BMPs would be consistent with construction site runoff controls detailed in the SDSU Stormwater Management Plan (SDSU 2022). 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.

Telecommunication

As discussed in the 2003 Campus Master Plan EIR, a telephone company is a publicly regulated utility and is obligated to serve the community and improve telecommunications facilities as needed. For internet services, the Project site is served by AT&T. The proposed Project would require a new point of connection for on-site telecommunications and would connect to the existing AT&T communications via the on-campus minimum point of entry. 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 telecommunications infrastructure would be completed in accordance with the Construction General Permit. Typical construction BMPs would include straw wattles, sediment basins, sediment fences, covering stockpiled soil, vehicle track-out controls at entrance/exit points, limitations on work periods during storm events, temporary secondary containment around portable toilets and equipment fueling areas, and on-site storage of absorbent pads for potential small spills. 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 telecommunications 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 Campus Master Plan EIR. The EIR found that the increase of an additional 250 FTE students (to an enrollment of 850 FTE students) would not present a substantial increase in water demand. 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.

The City of Calexico Public Works Department provides water service to the Project site. The City purchases raw imported water from the IID, which then delivers the water to the City via IID-owned and operated canals. The proposed Project's water demand would be approximately 6,111 gallons of water per day (7.42 acre-feet per year (AFY) or 2.4 million gallons per year. The City of Calexico 2020 Urban Water Management Plan (Calexico UWMP) provides demand projections over the next 20 years during normal, dry, and multiple dry years (City of Calexico 2022). The total demand through 2045 was projected using per-capita consumption rates that were based on the City's averages for the prior 4 years. The Calexico UWMP notes that the City will be able to provide 2,887 million gallons (or 8,860 AFY) of water under normal weather conditions in 2045, with an available leftover supply capacity of 33 million gallons. Therefore, the proposed Project's water demand of 7.42 AFY would represent a nominal fraction (approximately 0.08%) of the City's total available water supply. The Calexico UWMP further forecasts no water supply shortage in the future during normal, dry, and multiple dry years (City of Calexico 2022).

Additionally, 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 California Green Building Standards (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 Campus Master Plan EIR determined that there would be adequate wastewater treatment capacity to accommodate demand associated with buildout of the Off-Campus Center - Calexico (in addition to the existing commitments). Impacts were determined to be less than significant.

The City operates its own wastewater treatment system and would provide wastewater treatment services for the Project. According to the City's 2018 Draft Service Area Plan, the wastewater treatment plant has an average daily flow capacity of 2 million gallons per day and a peak daily flow capacity of 3.1 million gallons per day (City of Calexico 2018). Based on forecasted water demand, the proposed Project's wastewater generation is estimated to be approximately 0.003 million gallons per day of wastewater, which is 0.25% of remaining treatment capacity during peak flow days. 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**.

- 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 Off-Campus Center - Calexico were evaluated in Section 3.7, Public Services/Utilities, of the 2003 Campus Master Plan EIR. According to the EIR, the Calexico site is not anticipated to generate a substantial increase in solid waste under normal operation. Buildout of the Master Plan would cause a short-term increase in solid waste; however, this was not considered significant due to the capacity of the landfill and the short-term nature of the increase. Impacts were determined to be less than significant.

As to the present proposed Project, the nearest active solid waste facility to the Project site is the Imperial Landfill, located approximately 12 miles north. 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 12,027,900 tons, and a maximum permitted capacity of 19,514,700 tons through 2051 (CalRecycle 2019). The proposed Project would generate approximately 7.48 tons of solid waste per year (Dudek 2024; Appendix B). Therefore, annual waste generated by the Project after buildout would represent 0.0006% of the Imperial Landfill's remaining capacity and 0.0004% of Imperial Landfill's maximum permitted capacity. As a result, the Imperial Landfill has 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 Campus Master Plan EIR determined that expansion of the Off-Campus Center - Calexico 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.

As to the present proposed Project, landfill facilities that would serve 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 (County of Imperial 2023). 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 residential construction projects, 65% of the debris generated (by weight) must be recycled. Because the 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 checked="" type="checkbox"/>	<input 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 criterion included in Appendix G were not previously evaluated in the 2003 Campus Master Plan EIR or IS.

As to the present proposed Project, as described in Section 3.15 of this IS, 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 2022). The nearest mapped High or Very High Fire Hazard Severity Zones are located approximately 30 miles southwest and 55 miles northwest of the Project site. Additionally, the City has entered into mutual aid agreements with surrounding communities, including Imperial County and Mexicali, to ensure that adequate fire protection and services are provided to the City, including the Project site (SDSU 2003). The City provides fire protection services to the campus.

Because the Project site is not located in or near an State Responsibility Area 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 in Section 3.9, Hazards and Hazardous Materials, of this IS, designated evacuation routes within the City include SR-111 and SR-98, and Interstate 8 (City of Calexico 2015b). Additionally, the Project does not propose any road closures nor any modifications to existing emergency access 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, the approximately 0.58-acre Project site is flat and does not contain any slopes and 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 proposed Project would tie into existing City and IID infrastructure but would not create conditions that could exacerbate fire risk. The proposed Project does not involve the installation or maintenance of any infrastructure, other than electrical lines described herein, that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be **less than significant**.

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 site is situated 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 Master Plan EIR determined that development areas associated with buildout of the Off-Campus Center - Calexico do not contain rare or endangered plant or animal habitat and thus, implementation of the Imperial Valley Campus 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 Master Plan. Impacts were determined to be less than significant.

As discussed in Section 3.4, Biological Resources, of this IS, no mitigation measures were identified in the 2003 Campus Master Plan EIR. The proposed Project would include mitigation measure MM-BIO-1 to

reduce or avoid potentially significant impacts to protected Western Mastiff Bats and nesting birds (see MM-BIO-1 in Section 3.4 of this IS). The proposed Project would also require implementation of a new mitigation measure MM-GEO-1 discussed in Section 3.7 of this IS. Mitigation measure MM-GEO-1 would address the potential for unknown paleontological resources. Additionally, MM-AQ-1, MM-NOI-1, MM-TRA-1, and MM-TCR-1 would reduce or avoid potential impacts to sensitive receptors exposure to pollutant concentrations, ambient noise levels during construction, and hazardous construction-related road conditions, and tribal cultural resources, respectively. With implementation of these mitigation measures (i.e., MM-AQ-1, MM-NOI-1, MM-BIO-1, MM-GEO-1, and MM-TCR-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 Campus Master Plan EIR determined that buildout of the Off-Campus Center - Calexico would have no cumulatively considerable impacts.

The proposed Project would involve the construction and operation of a new affordable student housing complex to be located generally within the footprint of Building 21, as identified in the previously approved Calexico Campus Master Plan. 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.⁸ The proposed Project would implement all applicable mitigation measures identified in the 2003 Campus Master Plan EIR, as well as additional, Project-specific mitigation measures identified in this IS, to reduce or avoid potential impacts to sensitive receptors' exposure to pollutant concentrations (see MM-AQ-1 in Section 3.3), nesting birds and bats (see MM-BIO-1 in Section 3.4), cultural resources (see Section 3.5), tribal cultural resources (see MM-TCR-1 in Section 3.18), paleontological resources (see MM-GEO-1 in Section 3.7), ambient noise levels during construction (see MM-NOI-1 in Section 3.13). Finally, all development projects in the City 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 to cause cumulatively considerable significant impacts. For these reasons, impacts would be **less than significant with mitigation incorporated**.

⁸ The 2003 EIR identified mitigation measures applicable to cultural resources and geology/soils (see SDSU 2003 pages 3.2-4 through 3.2-5).

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 Campus Master Plan EIR determined that buildout of the Off-Campus Center – Calexico would not result in environmental effects that would cause substantial adverse effects on human beings and no impact would occur.

As evaluated throughout this IS, with the incorporation of mitigation measures identified in the 2003 Campus Master Plan EIR and of additional, Project-specific mitigation measures identified in this IS to address potentially significant impacts to air quality, biological resources, cultural/tribal resources, noise, paleontological resources, and transportation, 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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4 References and Preparers

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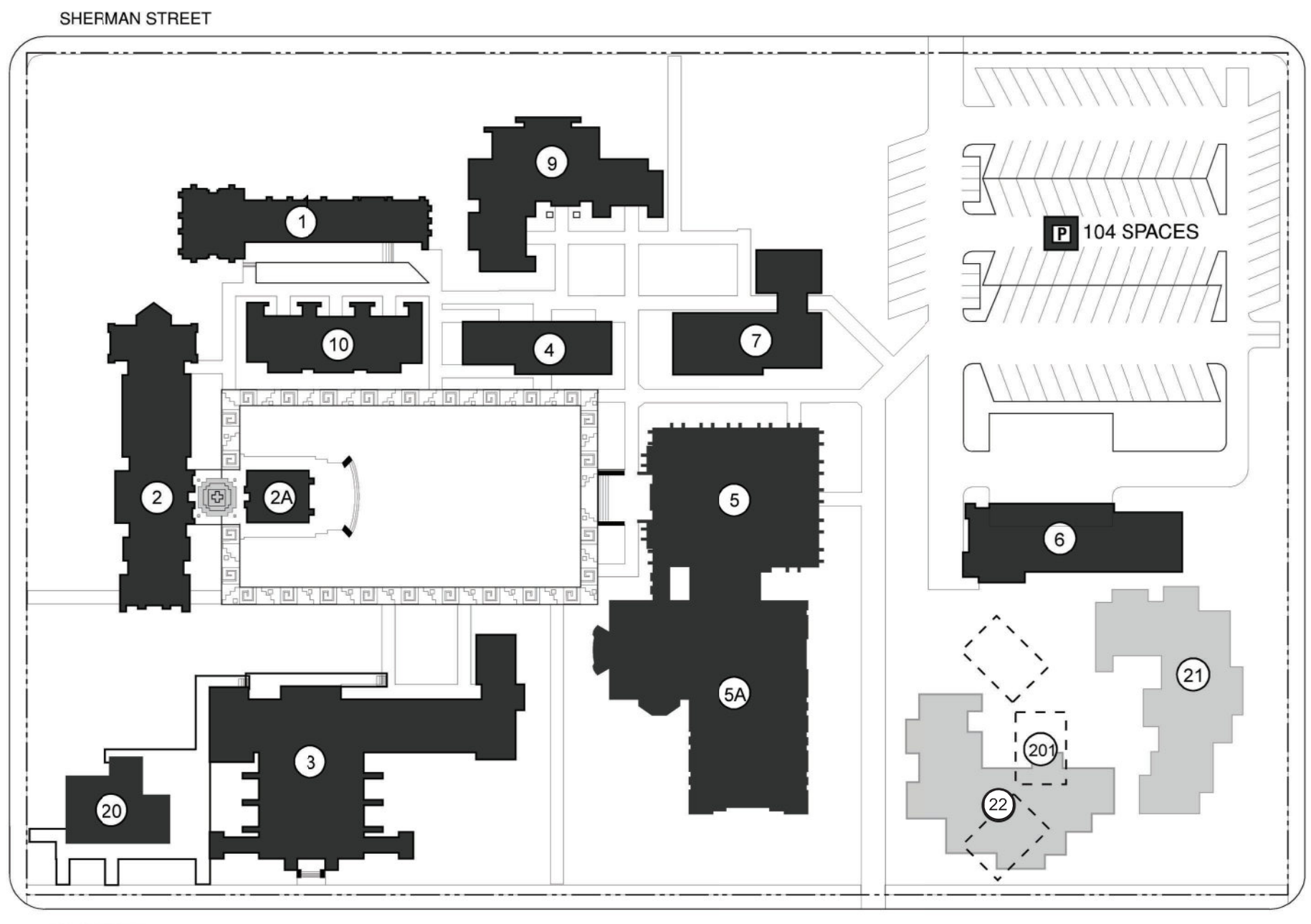


**SDSU Imperial Valley Off-Campus Center -
Calexico Affordable Student Housing Project**



**Figure 2
Vicinity Map**

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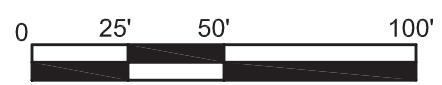
- SDSU-IVC BUILDING LEGEND**
- 1. North Classroom
 - 2. Administration
 - 2A. Art Gallery
 - 3. Auditorium
 - 4. Classrooms
 - 5. Library
 - 5A. Library Addition
 - 6. Physical Plant
 - 7. Computer Building/Campus Store
 - 8. Student Affairs
 - 9. Faculty Offices East
 - 10. Faculty Offices West
 - 20. Student Center
 - 21. Classroom Building/Classroom Building East
 - 22. Classroom Building South
 - 201. Temporary Buildings

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

San Diego State University

Imperial Valley Campus - Calexico
 Campus Master Plan
 Master Plan Enrollment: 850 FTE
 Approval Date: February 1980
 Revised Date: September 2003
 Main Campus Acreage: 8.4

SOURCE: SDSU 2003

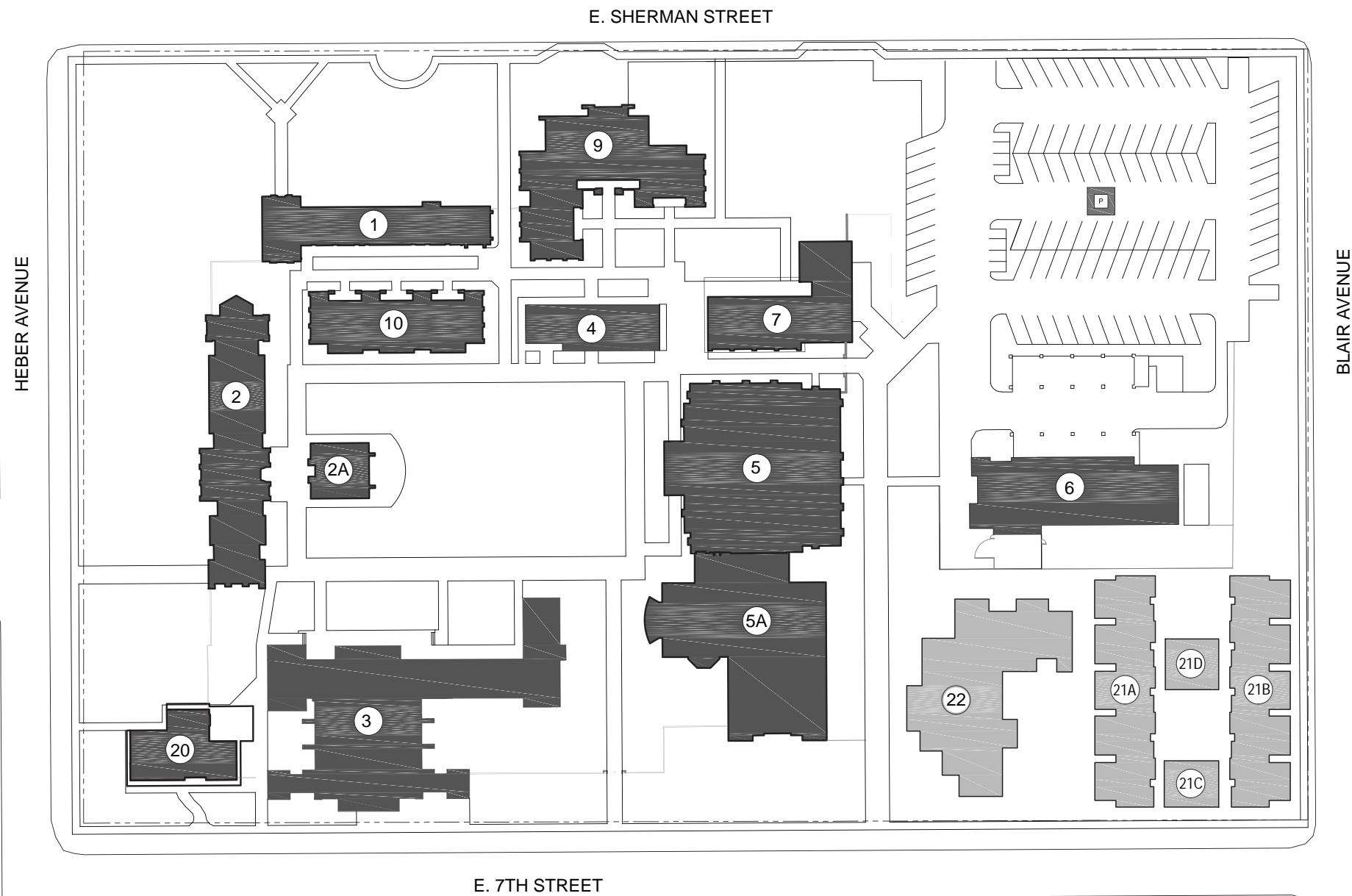


**SDSU Imperial Valley Off-Campus Center -
 Calexico Affordable Student Housing Project**



**Figure 3A
 Existing Campus Master Plan**

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SDSU-IVC BUILDING LEGEND

- 1. North Classroom
- 2. Administration
- 2A. Art Gallery
- 3. Auditorium
- 4. Classrooms
- 5. Library
- 5A. Library Addition
- 6. Physical Plant
- 7. Computer Building/Campus Store
- 8. Student Affairs
- 9. Faculty Offices East
- 10. Faculty Offices West
- 20. Student Center
- 21A. Student Housing West
- 21B. Student Housing East
- 21C. Student Housing Office
- 21D. Student Housing Community Center
- 22. Classroom Building South

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

PROPOSED
San Diego State University
 Imperial Valley Campus - Calexico
 Campus Master Plan
 Master Plan Enrollment: 850 FTE
 Approval Date: 1980
 Revised Date: September 2003
 Main Campus Acreage: 8.4

SOURCE: SDSU 2024

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

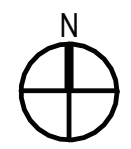
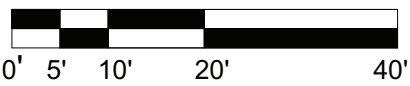
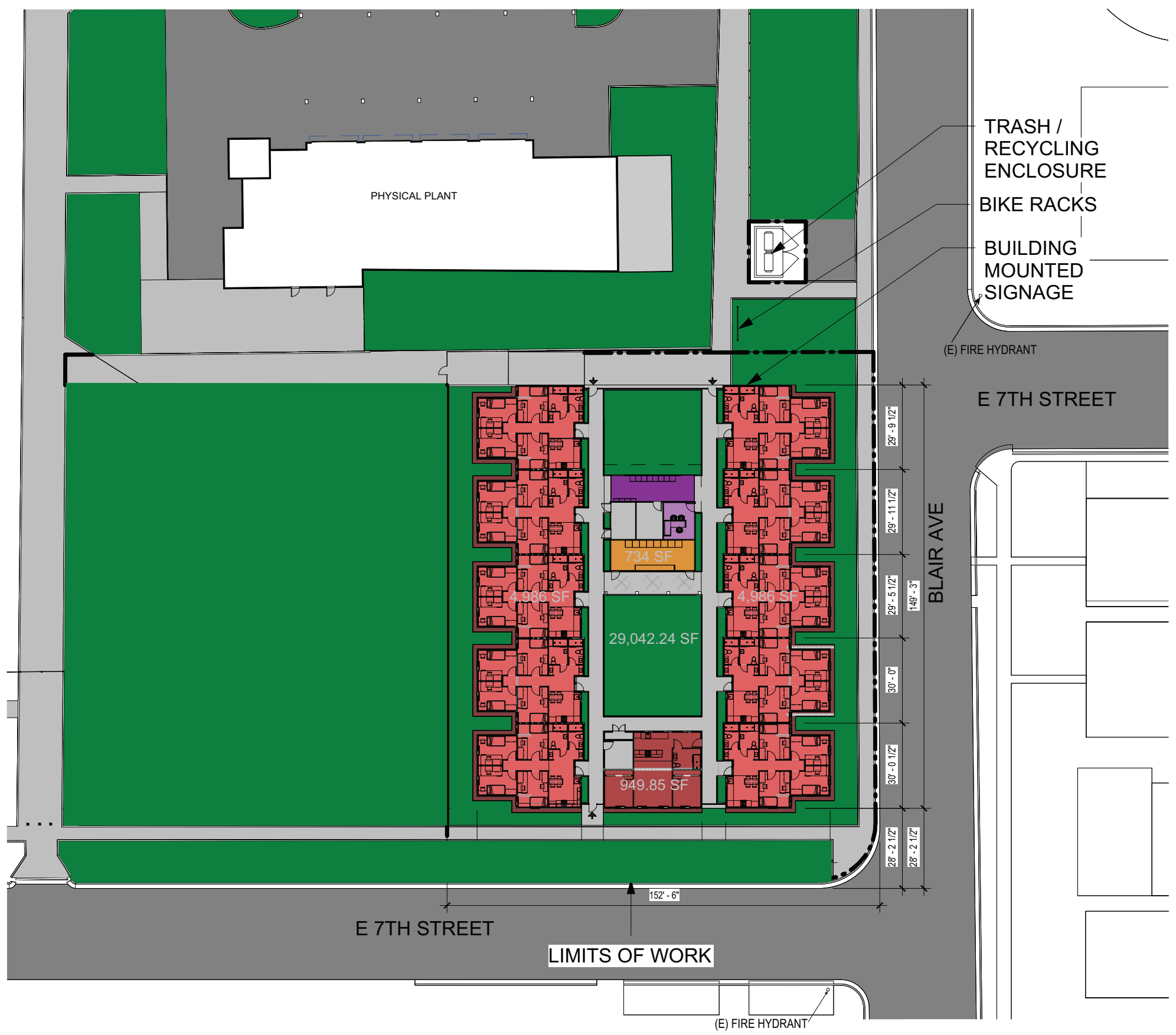


Figure 3B
Proposed Campus Master Plan

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LEGEND

- BEDROOM
- LAUNDRY
- LIVE-IN APARTMENT
- LOBBY
- MAIL/UPS
- SERVICE



SOURCE: SDSU 2024

FIGURE 4
Site Plan

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AERIAL VIEW @ SE CORNER



EYE LEVEL VIEW SE CORNER



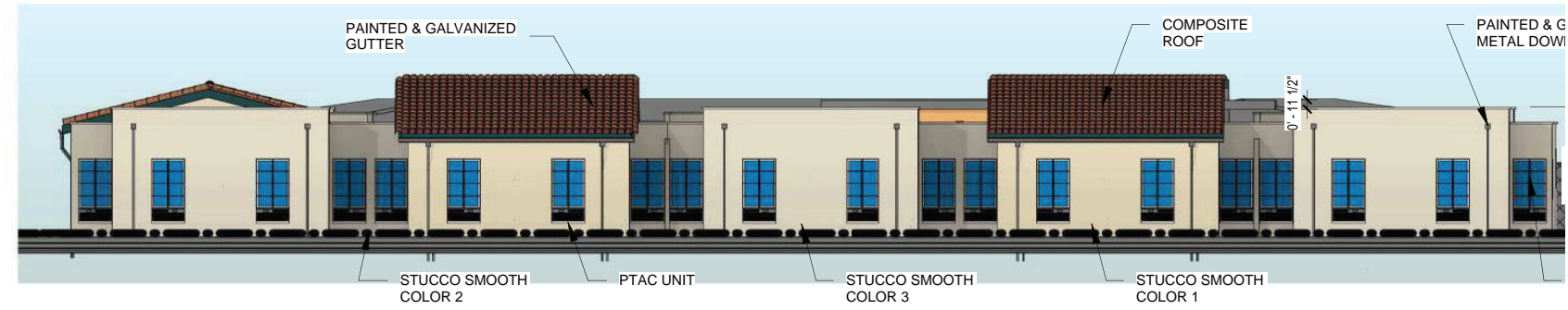
LOW AERIAL VIEW @ SE CORNER



EYE LEVEL VIEW SW COURTYARD

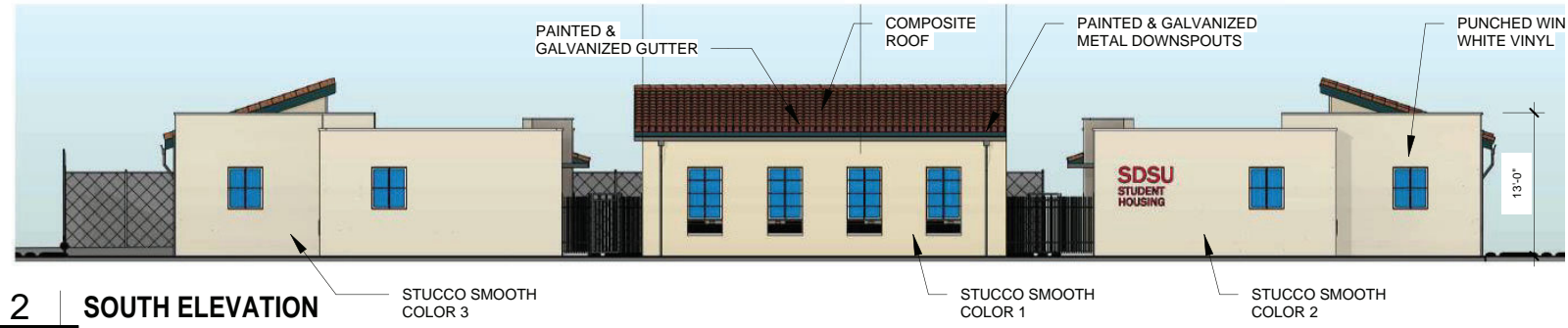
SOURCE: SDSU 2024

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1 EAST ELEVATION

SCALE: 1/16" = 1'-0"



2 SOUTH ELEVATION

SCALE: 1/16" = 1'-0"



3 NORTH ELEVATION

SCALE: 1/16" = 1'-0"



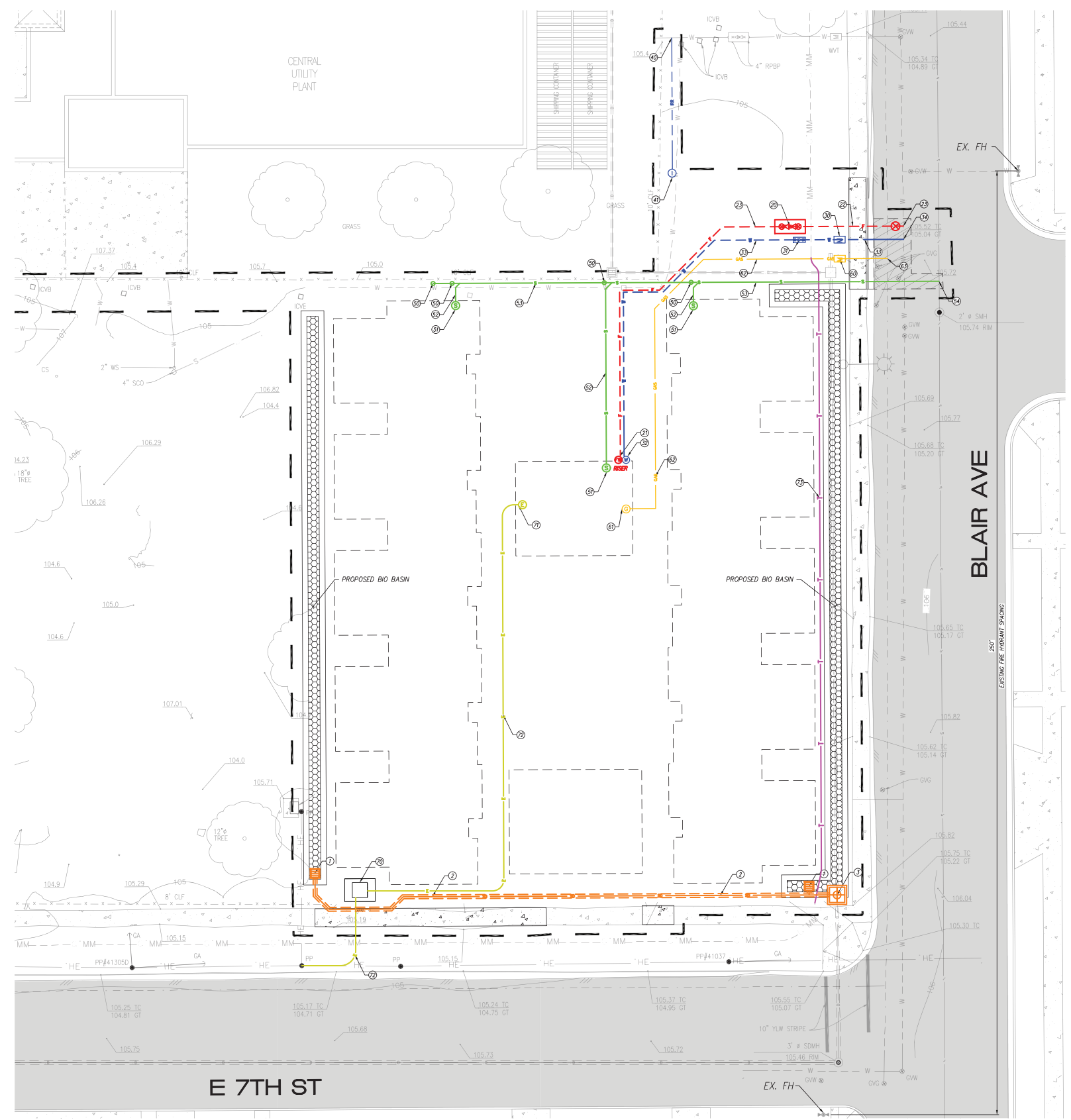
4 WEST ELEVATION

SCALE: 1/16" = 1'-0"

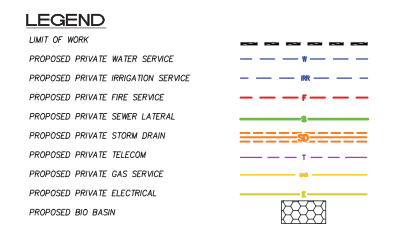


SOURCE: SDSU 2024

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- UTILITY CONSTRUCTION NOTES**
- STORM DRAIN NOTES**
- INSTALL 24"x24" CATCH BASIN.
 - INSTALL 8" HDPE STORM DRAIN.
 - INSTALL STORM DRAIN MANHOLE AND CONNECT TO EXISTING STORM DRAIN.
- FIRE NOTES**
- INSTALL DOUBLE DETECTOR CHECK VALVE ASSEMBLY WITH FDC.
 - POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING PLAN FOR CONTINUATION.
 - INSTALL 4" FIRE SERVICE.
 - CONNECT 4" FIRE LATERAL TO EXISTING WATER MAIN (TO BE DONE BY CITY FORCES).
- WATER NOTES**
- INSTALL 1.5" DOMESTIC WATER METER.
 - INSTALL 1.5" DOMESTIC WATER BACKFLOW PREVENTER.
 - POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING PLAN FOR CONTINUATION.
 - INSTALL 2" WATER SERVICE.
 - CONNECT 2" WATER LATERAL TO EXISTING WATER MAIN (TO BE DONE BY CITY FORCES).
- IRRIGATION NOTES**
- TAP EXISTING IRRIGATION WATER LINE.
 - INSTALL IRRIGATION SERVICE. SEE LANDSCAPE PLAN FOR CONTINUATION.
- SEWER NOTES**
- INSTALL SEWER CLEANOUT.
 - POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING PLAN FOR CONTINUATION.
 - INSTALL 4" SEWER.
 - INSTALL 6" SEWER.
 - CONNECT TO EXISTING 6" SEWER.
- GAS NOTES**
- INSTALL GAS METER. FOR REFERENCE ONLY, SEE PLUMBING PLAN FOR MORE DETAIL.
 - POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING PLAN FOR CONTINUATION.
 - INSTALL 0.75" GAS SERVICE. FOR REFERENCE ONLY, SEE PLUMBING PLAN FOR MORE DETAIL.
 - CONNECT 0.75" GAS LATERAL TO EXISTING GAS MAIN.
- ELECTRIC/TELECOM NOTES**
- PAD MOUNTED TRANSFORMER. FOR REFERENCE ONLY, SEE ELECTRICAL PLAN FOR MORE DETAIL.
 - POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE ELECTRICAL PLAN FOR CONTINUATION.
 - ELECTRIC CONDUIT. FOR REFERENCE ONLY, SEE ELECTRICAL PLAN FOR MORE DETAIL.
 - TELECOM CONDUIT. FOR REFERENCE ONLY, SEE TELECOM PLAN FOR MORE DETAIL.



33

0 5 10 20 30
1 inch = 30 ft.

latitude 33
PLANNING & ENGINEERING
10731 Truitt Street, San Diego, CA 92131
Tel 858.751.0622

SOURCE: SDSU 2024

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



**Figure 7
Utilities Plan**

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