
Appendix D

Cultural Resources and Tribal Cultural Resources Technical Memorandum

MEMORANDUM

To: Kara Peterson, San Diego State University
From: Makayla Murillo, Archaeologist Dudek
Subject: SDSU Imperial Valley Off-Campus Center – Calexico Affordable Student Housing Project - Cultural Resources and Tribal Cultural Resources Technical Memorandum
Date: December 20, 2024
cc: Sarah Lozano, Mollie Brogdon, Matthew DeCarlo, Dudek
Attachments: A – Figures
B – Confidential SCIC Records Search Results
C – NAHC Sacred Lands Search Results
D – Assembly Bill 52 Outreach Letter Example

Dudek has conducted an inventory pursuant to the requirements of the California Environmental Quality Act (CEQA), California Public Resources Code 21000, et seq., and related CEQA Guidelines to determine the presence and potential impacts related to cultural resources and tribal cultural resources associated with the proposed San Diego State University (SDSU) Calexico Affordable Student Housing Project (Project or proposed Project), to be located at the SDSU Imperial Valley Off-Campus Center, located in Calexico, California. This technical memorandum provides the results of the analysis of the proposed Project's potential impacts relative to cultural and tribal resources.

1 Project Overview and Background

In September 2003, the California State University (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 Calexico and Brawley, both located in Imperial County (SDSU 2003). The 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)¹ students at the 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 of Calexico (City). Most of the Calexico location 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 complex that would provide affordable student housing at the Calexico location for 80 students and a resident manager. Additional details regarding the proposed housing is provided below.

¹ A full-time equivalent (FTE) student is one full-time student taking 15 course credits, or 3 part-time students each taking 5 course credits.

2 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 Map). 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, Sherman Street to the north, Blair Avenue to the east, and 7th Street to the south. Residential uses bound the Calexico complex to the north, east, south, and west. Other surrounding uses include Calexico High School, located northeast, and Calexico City Hall, located immediately south. The Off-Campus Center - Calexico currently consists of 17 buildings and an associated surface parking lot (see Figure 2, Vicinity Map, 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 campus, 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.

3 Project Description

3.1 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 (two 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.

3.1.1 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 82 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 Off-Campus Center - Calexico students. A 2-bedroom unit

would also provide living space for on-site management. 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.

3.1.2 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, as well as the surrounding neighborhood. 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.

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, as well as 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. 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.

3.1.3 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 2024). 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 solar photovoltaic (PV) system.

3.1.4 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.

3.1.5 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, CSU Seismic Policy, The CSU Office of the Chancellor Guidelines, and the CSU Sustainability Policy, 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

Table 2. Anticipated Construction Equipment

Dumpers/Tenders	Rubber-Tired Dozers
Excavators	Rubber-Tired Loaders
Forklifts	Scrapers
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.

4 Regulatory Framework

The California Register of Historic Resources (Public Resources Code section 5020 et seq.)

Under CEQA, the term “historical resource” includes but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code section 5020.1(j)). In 1992, the California legislature established the California Register of Historic Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California Public Resources Code section 5024.1(a)). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places (NRHP) criteria:

- Associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- Associated with the lives of persons important in our past.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Has yielded, or may be likely to yield, information important in prehistory or history.

(California Public Resources Code section 5024.1(c).) Resources less than 50 years old are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR, section 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing on the NRHP are automatically listed on the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The State Historic Preservation Officer maintains the CRHR.

Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC (Native American Heritage Commission) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological and historic resources:

1. California Public Resources Code section 21083.2(g): Defines “unique archaeological resource.”
2. California Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5(a): Define historical resources. In addition, CEQA Guidelines section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of a historical resource.
3. California Public Resources Code section 5097.98 and CEQA Guidelines section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
4. California Public Resources Code sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the

archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines section 15064.5(b)(1); California Public Resources Code section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

See Section 7.1, below for a discussion of the CEQA guidelines for determining significance and mitigating impacts to unique archaeological resources.

Assembly Bill 52

California AB 52, which took effect July 1, 2015, establishes a consultation process between California Native American Tribes and lead agencies, to be conducted as part of the CEQA process, to address tribal concerns regarding project impacts and mitigation to “tribal cultural resources” (TCR). Public Resources Code section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, and object with cultural value to a California Native American tribe that is either:

1. listed or eligible for listing in the CRHR or a local register of historical resources, or
2. determined by a lead agency to be a TCR.

Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

5 Analysis Methodology

The analysis considers the potential environmental impacts of the proposed Project on historic, cultural and tribal cultural resources relative to existing conditions. The Project site is an undeveloped site that does not contain any buildings or structures and has previously been graded. Establishment of the Project site's existing cultural resource conditions has been prepared using information contained in the previously certified 2003 SDSU Imperial Valley Campus Master Plan Project EIR (SDSU 2003), with the information updated, as applicable, with recent California Historical Resources Information System (CHRIS) records search results, NAHC sacred lands file (SLF) search results, pedestrian survey results, archival research, and information provided by culturally affiliated Tribal groups.

6 Cultural Resources Inventory

6.1 Methods and Results

6.1.1 Records Search

Dudek conducted a CHRIS records search for the Project area and a 1-mile radius buffer around the Project area at the South Coastal Information Center (SCIC) on June 26, 2024. The SCIC records search revealed that 32 previous cultural resources studies have been completed within 1-mile of the Project area; these 32 previous studies are listed in Table 3, Previous Cultural Studies Within 1-Mile of the Project Area, below. None of the previously recorded cultural studies intersect the Project area; however, one previously recorded cultural resource study (IM-0441) is located adjacent to the Project area. These studies include 23 archaeological evaluations, eight archaeological field studies, and one archaeological and historical evaluation. Based on the previous studies, the Project area has not been previously studied nor have any cultural resources been identified within the Project area

boundaries as part of the studies of the proximate areas. The results of the records search are included in Confidential Attachment B.

Table 3. Previous Cultural Studies Within 1-Mile of the Project Area

Report Number	Year	Title	Author	Proximity
IM-00002	1974	ENVIRONMENTAL IMPACT REPORT - PROPOSED LAGO DEL SOL RECREATION LAKE, CITY OF CALEXICO, IMPERIAL COUNTY	VON WERLHOF, JAY	Outside
IM-00238	1981	ARCHAEOLOGICAL EXAMINATION OF THE BRAVO PROPERTIES DEVELOPMENT PROJECT	IMPERIAL VALLEY COLLEGE MUSEUM	Outside
IM-00266	1982	DRAFT ENVIRONMENTAL IMPACT REPORT AIRPORT LAND USE PLAN	IMPERIAL COUNTY PLANNING DEPARTMENT	Outside
IM-00268	1982	DRAFT ENVIRONMENTAL IMPACT REPORT - CALEXICO CENTRAL BUSINESS DISTRICT REDEVELOPMENT PROJECT	URBAN FUTURES, INC.	Outside
IM-00441	1990	ENVIRONMENTAL ASSESSMENT/INITIAL STUDY FOR THE PLACEMENT OF FIBER OPTIC FACILITIES BETWEEN SALTON MICROWAVE STATION AND CALEXICO CALIFORNIA	ENSR CONSULTING AND ENGINEERING	Outside
IM-00506	1994	CULTURAL RESOURCE OVERVIEW, ALL-AMERICAN CANAL LINING PROJECT, FINAL REPORT	BUREAU OF RECLAMATION	Outside
IM-00549	1997	ARCHAEOLOGICAL EXAMINATIONS OF APN #58-792-03 IN CALEXICO, CALIFORNIA	IMPERIAL VALLEY COUNTY DESERT MUSEUM	Outside
IM-00600	1997	CULTURAL RESOURCES ASSESSMENT OF A PROPOSED APARTMENT COMPLEX IN CALEXICO, IMPERIAL COUNTY, CALIFORNIA	PEAK & ASSOCIATES, INC.	Outside
IM-00604	1997	NEGATIVE ARCHAEOLOGICAL SURVEY REPORT - CULTURAL RESOURCES REPORT ON THE CALEXICO WATER TREATMENT PLANT SYSTEMS IMPROVEMENT, STAGES 1, 2, AND 3	IMPERIAL VALLEY COLLEGE DESERT MUSEUM	Outside
IM-00616	1984	ARCHAEOLOGICAL EXAMINATIONS FOR CBM RANCHO FRONTERA PROJECT, CALEXICO	IMPERIAL VALLEY COLLEGE	Outside
IM-00652	1999	ARCHAEOLOGICAL EXAMINATIONS OF CITY OF CALEXICO WATER TREATMENT DISTRIBUTION MAIN LINE	IMPERIAL VALLEY COLLEGE DESERT MUSEUM	Outside
IM-00662	1992	EXPANDED INITIAL STUDY EL DORADO SUBDIVISION	TEMPLETON PLANNING GROUP, INC	Outside

Table 3. Previous Cultural Studies Within 1-Mile of the Project Area

Report Number	Year	Title	Author	Proximity
IM-00829	2001	THE ALL-AMERICAN CANAL: AN HISTORIC PROPERTIES INVENTORY AND EVALUATION	ASM AFFILIATES	Outside
IM-00986	2005	ENVIRONMENTAL ASSESSMENT FOR GAMMA IMAGING INSPECTION SYSTEM, PORT OF ENTRY (WEST) CALEXICO, IMPERIAL COUNTY, CALIFORNIA	DEPARTMENT OF HOMELAND SECURITY	Outside
IM-01060	1990	60 UNIT SENIOR CITIZENS COMPLES ON 3.0 ACRES IN CALEXICO, CALIFORNIA	IMPERIAL VALLEY COLLEGE MUSEUM	Outside
IM-01435	2011	CONSULTATION FOR PROPOSED COLLOCATION CALEXICO, 352 FIRST ST, CALEXICO, CA	TETRA TECH	Outside
IM-01459	2011	CITY OF CALEXICO, REPLACE NEW RIVER SEWER CROSSING, FEMA-1911-DR-CA-PW#71	U.S. DEPARTMENT OF HOMELAND SECURITY	Outside
IM-01475	2011	FINAL ENVIRONMENTAL IMPACT STATEMENT FOR EXPANSION AND RECONFIGURATION OF THE LAND PORT OF ENTRY IN DOWNTOWN CALEXICO, CALIFORNIA	GSA	Outside
IM-01482	2011	SECTION 106 CONSULTATION FOR U.S. CUSTOMS AND BORDER PROTECTION IMPLEMENTATION OF TIER 3 OUTBOUND ELEMENTS AT LAND PORTS OF ENTRY ALONG THE U.S.-MEXICO BORDER	DEPARTMENT OF HOMELAND SECURITY	Outside
IM-01501	2012	SECTION 106 CONSULTATION FOR INSTALLATION OF NEW TECHNOLOGIES AND SECURITY ELEMENTS AT CALEXICO EAST, ANDRADE AND OTAY MESA LAND PORTS OF ENTRY, IMPERIAL AND SAN DIEGO COUNTIES	U.S. CUSTOMS AND BORDER PROTECTION	Outside
IM-01504	2012	JEFFERSON ELEMENTARY SCHOOL, CALEXICO, FEMA-DR-1911-CA	FEMA	Outside
IM-01507	2009	EVALUATION OF BUILDINGS AND STRUCTURES AT THE LAND PORTS OF ENTRY IN CALIFORNIA	MICHAEL BAKER JR., INC.	Outside
IM-01523	2011	CALEXICO GRAN PLAZA FINAL ENVIRONMENTAL IMPACT REPORT	ESA	Outside
IM-01581	2014	CULTURAL RESOURCES RECORDS SEARCH AND SITE VISIT RESULTS FOR T-MOBILE WEST, LLC CANDIDATE SD06348A (SD348 CALEXICO WATER TANK) 352 EAST 1ST STREET,	ENVIRONMENTAL ASSESSMENT SPECIALISTS, INC.	Outside

Table 3. Previous Cultural Studies Within 1-Mile of the Project Area

Report Number	Year	Title	Author	Proximity
		CALEXICO, IMPERIAL COUNTY, CALIFORNIA		
IM-01584	2015	FIRST SUPPLEMENTAL HISTORIC PROPERTY SURVEY REPORT FOR THE STATE ROUTE 98 WIDENING, PHASE 1-B, CITY OF CALEXICO, IMPERIAL COUNTY	CALTRANS	Outside
IM-01682	2017	SECOND SUPPLEMENTAL HISTORIC PROPERTY SURVEY REPORT FOR THE STATE ROUTE 98 WIDENING PROJECT PHASE 1-C IN CALEXICO, IMPERIAL COUNTY	CALTRANS	Outside
IM-01712	2018	CULTURAL RESOURCES STUDY FOR THE NEW RIVER IMPROVEMENT PROJECT STRATEGIC PLAN, CITY OF CALEXICO, IMPERIAL COUNTY, CALIFORNIA	MICHAEL BAKER INTERNATIONAL	Outside
IM-01724	2019	CLASS III CULTURAL RESOURCES INVENTORIES IN SUPPORT OF THE FY18 FENCE REPLACEMENT PROJECTS IN THE SAN DIEGO, EL CENTRO, AND YUMA SECTORS, U.S. CUSTOMS AND BORDER PROTECTION, SAN DIEGO AND IMPERIAL COUNTIES, CALIFORNIA	ENVIROSYSTEMS MANAGEMENT, INC.	Outside
IM-01730	2017	PROPOSED GEOTECHNICAL SURVEY ALONG 2.2 MILES OF PRIMARY PEDESTRIAN BORDER FENCE IN CALEXICO, IMPERIAL COUNTY, CALIFORNIA	U.S. CUSTOMS AND BORDER PROTECTION	Outside
IM-01751	2018	CULTURAL RESOURCES RECORDS SEARCH AND SITE VISIT RESULTS FOR T-MOBILE WEST, LLC CANDIDATE SD07255A (CALEXICO HIGH SCHOOL), 1030 ENCINAS AVENUE, CALEXICO, IMPERIAL COUNTY, CALIFORNIA	ENVIRONMENTAL ASSESSMENT SPECIALISTS, INC.	Outside
IM-01752	2018	CULTURAL RESOURCE RECORDS SEARCH AND SITE VISIT RESULTS FOR VERIZON WIRELESS CANDIDATE 'ANDRADE', 843 EAST BELCHER STREET, CALEXICO, IMPERIAL COUNTY, CALIFORNIA	HELIX ENVIRONMENTAL PLANNING	Outside
SD-17890	2019	CLASS III CULTURAL RESOURCES INVENTORIES IN SUPPORT OF THE FY18 FENCE REPLACEMENT PROJECTS IN THE SAN DIEGO, EL CENTRO, AND YUMA SECTORS, U.S. CUSTOMS AND	ENVIROSYSTEMS MANAGEMENT, INC.	Outside

Table 3. Previous Cultural Studies Within 1-Mile of the Project Area

Report Number	Year	Title	Author	Proximity
		BORDER PROTECTION, SAN DIEGO AND IMPERIAL COUNTIES, CALIFORNIA		

Previously Recorded Resources

The SCIC records search revealed that no cultural resources have been recorded within the proposed Project area. However, the SCIC records search results identify 13 cultural resources within 1-mile of the Project area (Table 4, Previously Recorded Cultural Resources Within 1-Mile of the Project Area). All of the resources identified in the 1-mile search radius are historic. The results of the records search and all Department of Parks and Recreation (DPR) forms are included in Confidential Attachment B.

Table 4. Previously Recorded Cultural Resources Within 1-Mile of the Project Area

Primary Number	Trinomial	Age	Description	Proximity
P-13-003499	CA-IMP-003499	Historic	Cross U.S. military telegraph	Outside
P-13-007130	CA-IMP-007130	Historic	Canal/aqueduct	Outside
P-13-008015		Historic	California Historical Landmark for Camp Salvation	Outside
P-13-008016		Historic	Calexico Public Library	Outside
P-13-008017		Historic	Calexico Union High School Auditorium/Music Room/Library	Outside
P-13-008018		Historic	Calexico Union High School Arts and Science Building	Outside
P-13-008019		Historic	U.S. Border Station	Outside
P-13-008020		Historic	Chinese American Community	Outside
P-13-008682	CA-IMP-008166	Historic	Southern Pacific Railroad	Outside
P-13-011425		Historic	Commercial building	Outside
P-13-012367		Historic	Multiple family property	Outside
P-13-014744		Historic	Government building	Outside
P-13-014745	CA-IMP-003499	Historic	Bridge	Outside

6.1.2 Archival Research

Dudek consulted historic maps and aerial photographs to understand the development history of the Project site. Historic aerial photographs of the Project site were available from 1953 to 2020 (see NETR 2024). The 1953 historic photograph shows the Project site as vacant land that had been graded. By 1953, it appears 7th Street had been developed to the south and Blair Avenue had been developed east of the Project. Additionally, the 1953 aerial imagery reveals residential properties and institutional buildings (currently SDSU Imperial Valley Off- Campus Center, Calexico) were developed within the surrounding area. While there are no substantial changes to the Project

site in the 1959 aerial photograph, there was development of one building west of the site. The 1985 photograph shows that an additional building was developed to the northwest and a parking lot was developed immediately north of the Project site. The 1996 aerial imagery reveals an additional building was developed to the northwest and the parking lot was expanded. By 2002, the aerial imagery reveals three structures were developed immediately west of the Project site. The 2005 aerial imagery conditions look similar to present day conditions. Review of the historic aerial images demonstrates that areas surrounding the Project site have undergone substantial earth movement from the construction of the current SDSU Off-Campus Center – Calexico and residential development and the site has not been developed. There are no historic-age structures present on the Project site.

Historic topographic maps were also reviewed (earliest available is 1957). The topographic map from 1957 reveals an institutional development (former educational building) is located adjacent to the Project site (see USGS 1957).

6.1.3 Review of Geomorphological Context

According to the U.S. Department of Agriculture Natural Resources Conservation Services (USDA 2024), one soil type is mapped in the Project area, including Imperial-Glenbar silty clay loams. The Imperial-Glenbar soil series generally occur in settings with basin floors at elevations ranging from -230 to 200 feet and are composed of clayey alluvium derived from mixed and/or clayey lacustrine deposits (USDA 2024). Reoccurring alluvial action and flooding serve to support the development and presence of cultural deposits in the area. Since there are alluvial soils present throughout the Project area, there would be low to moderate potential for subsurface cultural resources, however, historic aerial photographs illustrate that the Project area has been highly disturbed.

6.1.4 NAHC and Tribal Correspondence

Native American Heritage Commission Sacred Lands File Search

Dudek requested a NAHC search of the SLF on June 10, 2024, for the Project area. The SLF consists of a database of known Native American resources. These resources may not be included in the SCIC database. The NAHC responded via email on June 28, 2024, with results indicating the potential presence of relevant resources within the geographic area. The NAHC provided a list of Native American Tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area. Dudek sent outreach letters to all Native American group representatives included on the NAHC contact list on July 19, 2024. These letters requested 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. The NAHC correspondence is included in Attachment C.

Assembly Bill (AB) 52 Consultation

The Project is subject to compliance with AB 52 (California Public Resources Code [PRC], Section 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed Project. Although no tribes previously requested such notice, The CSU Board of Trustees, as lead agency, sent letters to all tribes included on the previously referenced NAHC list on July 26, 2024. The letters contained the following information: a project description and location

description; a request for input relative to tribal cultural resources in the area; an outline of timing relative to the AB 52 process; an opportunity for consultation; and contact information for the appropriate tribal representative. A copy of the AB 52 letter provided to the tribes is included in Attachment D.

SDSU received responses from the Campo Band of Mission Indians and the Viejas Band of Kumeyaay Indians. Viejas Band of Kumeyaay Indians responded, stating 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. However, Campo Band of Mission Indians requested that tribal monitoring be required to mitigate any potential significant impacts related to tribal cultural resources. Below, 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.

Consultation between SDSU and Campo Band of Mission Indians and Viejas Band of Kumeyaay Indians pursuant to AB 52 was considered closed on December 17, 2024, and December 18, 2024, respectively.

6.1.5 Intensive Pedestrian Survey

Dudek archaeologist Javier Hernandez conducted an intensive-level pedestrian survey of the Project area on June 27, 2024. Red Tail Environmental Inc., Native American monitor Keadon Graham participated in the pedestrian survey. All survey work was conducted employing standard archaeological procedures and techniques consistent with the Secretary of the Interior Standards. The ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials.

The Project area is flat and has been previously graded and disturbed from the development of the adjacent campus structures, parking lot, and roadways. Ground visibility was poor (10%) throughout the entire Project area due to landscaped grass and trees (Exhibit 1). Evidence of disturbance can be observed throughout the entire Project area evidenced by planted trees and buried irrigation pipes (Exhibit 2). No artifacts or features were identified during the survey.

6.1.6 2003 Campus Master Plan EIR

The previously certified 2003 Campus Master Plan EIR evaluated possible impacts to archaeological and historical resources pursuant to §15064.5 of the CEQA Guidelines in Section 3.5, Cultural Resources, of the 2003 Campus Master Plan EIR. The EIR stated that “based on the records and literature research and site survey,” there would

be no significant impacts to cultural resources as a result of development of the proposed SDSU Off-Campus Center Master Plan - Calexico. The EIR included a mitigation measure that outlines response protocol and requirements in the event that potential resources are discovered during excavation and/or construction associated with buildout of the Off-Campus Center - Calexico (See MMP page 11-2 through 11-3 of the 2003 Campus Master Plan EIR reprinted below). With implementation of the mitigation measure, impacts were determined to be less than significant.

The following mitigation measure from the 2003 Campus Master Plan EIR would still apply to this Project.

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 archaeologist designated by the California Archaeological 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 archaeologist. 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.

MEMORANDUM

SUBJECT: SDSU IMPERIAL VALLEY OFF-CAMPUS CENTER – CALEXICO, AFFORDABLE STUDENT HOUSING PROJECT -
CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES TECHNICAL MEMORANDUM

Exhibit 1: Overview of landscaped grass and trees, facing north.



Exhibit 2: Overview of disturbances within the Project area, facing southeast.

6.1.7 Summary of Research

The cultural resources inventory of the Project site presented in this report was completed consistent with the requirements of CEQA. The inventory indicates that there is low probability of identifying intact subsurface cultural resource deposits during Project construction. The SCIC records search did not identify any cultural resources within the Project area. Additionally, an intensive pedestrian survey did not identify any cultural resources within the Project area. The review of aerial photographs reveals that the Project area has been previously graded due to construction of nearby campus structures, parking lot, and the adjacent roadways. As such, there is a low probability that the Project would encounter intact subsurface archaeological deposits since any that may have been present would have been disturbed by previous grading and would no longer remain intact. These findings are similar to the finding of the 2003 Campus Master Plan EIR which determined that there would be no significant impacts to cultural resources as a result of development of the proposed SDSU Off-Campus Center Master Plan - Calexico.

In compliance with AB 52, the Board of Trustees is responsible for conducting government to government consultation with pertinent tribal entities relative to tribal cultural resources under AB 52. Consultation may reveal the presence of tribal cultural resources within the Project area and mitigation may be required. This report may be updated to include the results of Native American consultation, if required.

7 Impact Analysis and Conclusions for Cultural Resources

7.1 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to cultural resources pursuant to CEQA are based on Appendix G of the CEQA Guidelines (Cal. Code Regs., Title 14, Chptr. 3, sections 15000-15387). Based on Appendix G, a significant impact under CEQA would occur if the Project would:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- c) Disturb any human remains, including those interred outside of dedicated cemeteries?

7.2 Impact Analysis

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

Impacts to historical resources pursuant to §15064.5 were evaluated in the Initial Study (IS) prepared for the 2003 Campus Master Plan EIR, which concluded that no significant impacts to historical resources would occur.

Dudek's current cultural resources inventory of the Project site did not identify any historical resources within the Project area. A SCIC records search 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. There are no historic-era (greater than 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 §15064.5 and potential impacts to historic resources as a result of Project implementation would have **no impact**.

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

Impacts to archaeological resources pursuant to §15064.5 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 SDSU Off-Campus Center Master Plan - Calexico. The EIR included a mitigation measure that outlines response protocol and requirements in the event that potential resources are discovered during excavation and/or construction associated with buildout of the SDSU Off-Campus Center - Calexico (See MMP page 11-2 through 11-3 of the 2003 Campus Master Plan EIR reprinted above). With implementation of the mitigation measure, impacts were determined to be less than significant. All applicable mitigation measures from the 2003 Campus Master Plan EIR will be included in the Mitigation Monitoring and Reporting Program (MMRP) for this Project.

Dudek's current cultural resources inventory of the Project site indicates 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 §15064.5 within the Project area. The 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. Any intact archaeological subsurface deposits that were present would have been disturbed by previous grading and would no longer remain intact. These findings are similar to the finding of the 2003 Campus Master Plan EIR which determined that there would be no significant impacts to cultural resources as a result of development of the proposed SDSU Off-Campus Center Master Plan - Calexico.

However, because the Project includes ground disturbance associated with construction of the new building, the low potential to encounter and/or destroy previously undiscovered archaeological materials or features during earth-moving activities does exist. Any substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 would be a potentially significant impact. Continued/ongoing implementation of the Cultural Resources mitigation measure included in the 2003 EIR MMP and previously adopted by the Board of Trustees, would reduce potentially significant impacts to a **less-than-significant** level by requiring construction to halt in the event of an archaeological discovery during construction activities, and evaluation of the find by a qualified archaeologist.

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

The IS prepared for the 2003 EIR determined that no impacts to human remains would occur within the campus boundaries. However, the mitigation measure included in the 2003 EIR notes that SDSU construction contracts address the discovery of human remains and require notification of the County Coroner and a qualified archaeologist in the event of such discovery, and if the remains are determined to be Native American, require contact of the appropriate tribal representatives to oversee removal of the remains (see Section 6.1.6 for the 2003 EIR mitigation measure or MMRP pages 11-2 through 11-3 of the 2003 Campus Master Plan EIR).

The Project area is not used as a cemetery and is not otherwise known to contain human remains. The pedestrian field survey 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. If remains are discovered during Project construction activities, SDSU and its construction contractor, consistent with the previously adopted mitigation measure, would comply with procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5).

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the 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 (MLD) from the

deceased Native American. The MLD 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**.

7.3 Impact Summary

Dudek's assessment found no evidence of cultural resources within the Project area and determined that no historical resources, as defined under CEQA, would be impacted by the Project. This includes no direct, indirect, or cumulative impacts. In consideration of the negative results of the intensive-level survey and archival research, Dudek recommends no further archaeological efforts including cultural construction monitoring, to be necessary in support of implementation of the Project. The Project would implement the cultural resources mitigation measure from the 2003 Campus Master Plan EIR, provided above under Section 6.16, to ensure in the event of an archaeological discovery during construction activities, construction would be stopped and the find evaluated by a qualified archaeologist. This would ensure any potential impact would be reduced to a less-than-significant level.

8 Impact Analysis and Conclusions for Tribal Cultural Resources

8.1 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to tribal cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact to tribal cultural resources under CEQA would occur if the Project would:

1. 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 the local register of historical resources as defined in Public Resources Code section 5020.1(k); or
 - 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.

8.2 Impact Analysis

- a) *Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC Section 21074, as either a site, feature, place, or 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 resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC, Section 5020.1(k)?*

and

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074, as either a site, feature, place, or 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 resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC, Section 5024.1(c)? In applying the criteria set forth in PRC, Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

The IS prepared for the 2003 EIR did not analyze impacts to tribal cultural resources as AB 52 was not effective at the time and did not go into effect until July 1, 2015.

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

A search of the NAHC SLF was conducted and the NAHC responded with results indicating the potential presence of relevant resources within the geographic area. The NAHC additionally provided a list of Native American Tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area. Dudek sent outreach letters to all Native American group representatives included on the NAHC contact list on July 19, 2024. These letters are requesting 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 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. 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 Measure

Mitigation measure TCR-1, presented below, would reduce potentially significant impacts to tribal cultural resources if identified as being present on the Project site to a **less-than-significant level** by requiring cultural resources monitoring during 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 (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 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, the 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

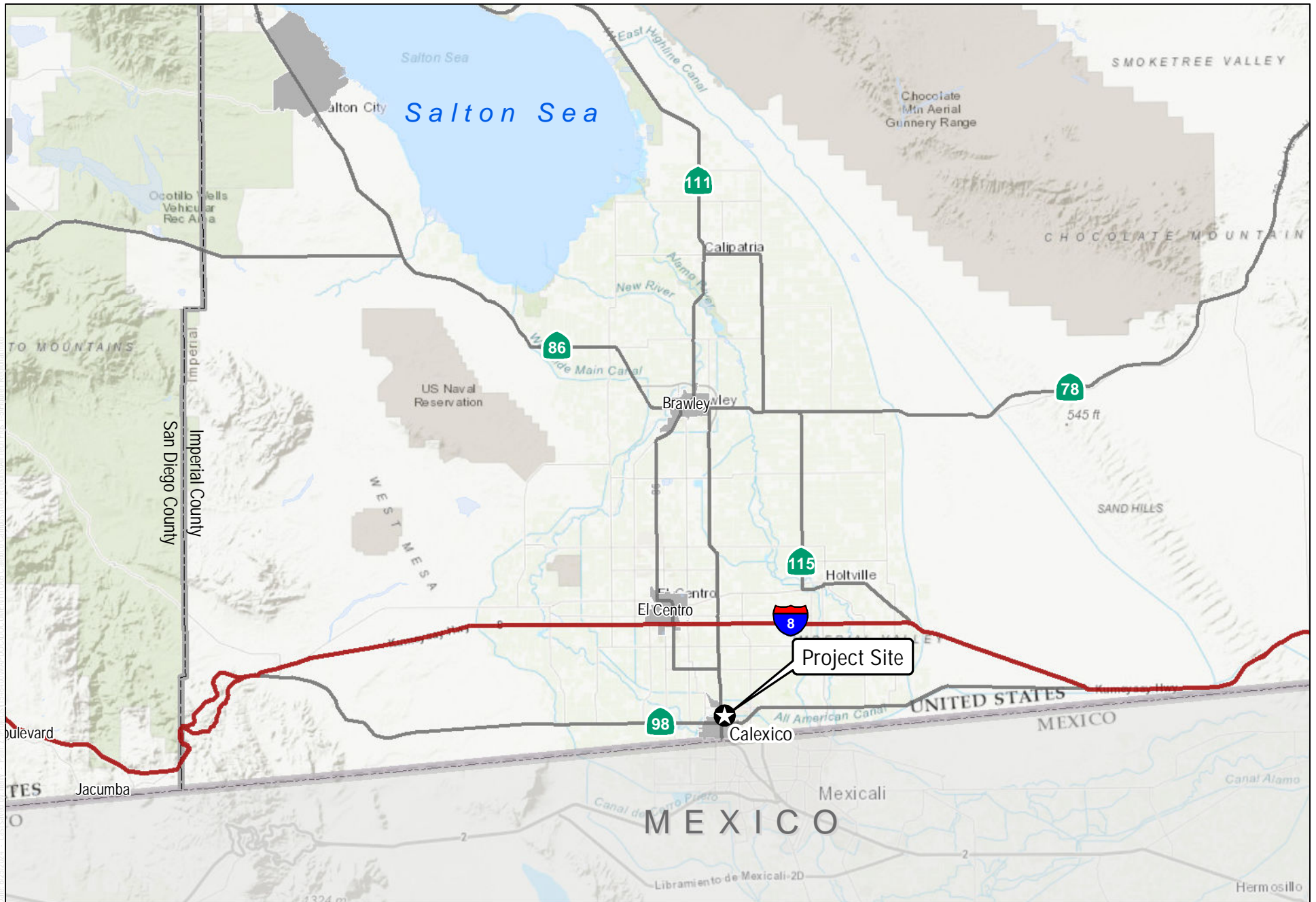
representative of the Campo Band of Mission Indians, as determined through the appropriate process, for respectful and dignified treatment and disposition, including reburial at a protected location on-site. All cultural materials that are associated with burial and/or funerary goods shall be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission, per California Public Resources Code Section 5097.98.

9 References

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Attachment A

Figures



SOURCE: ESRI

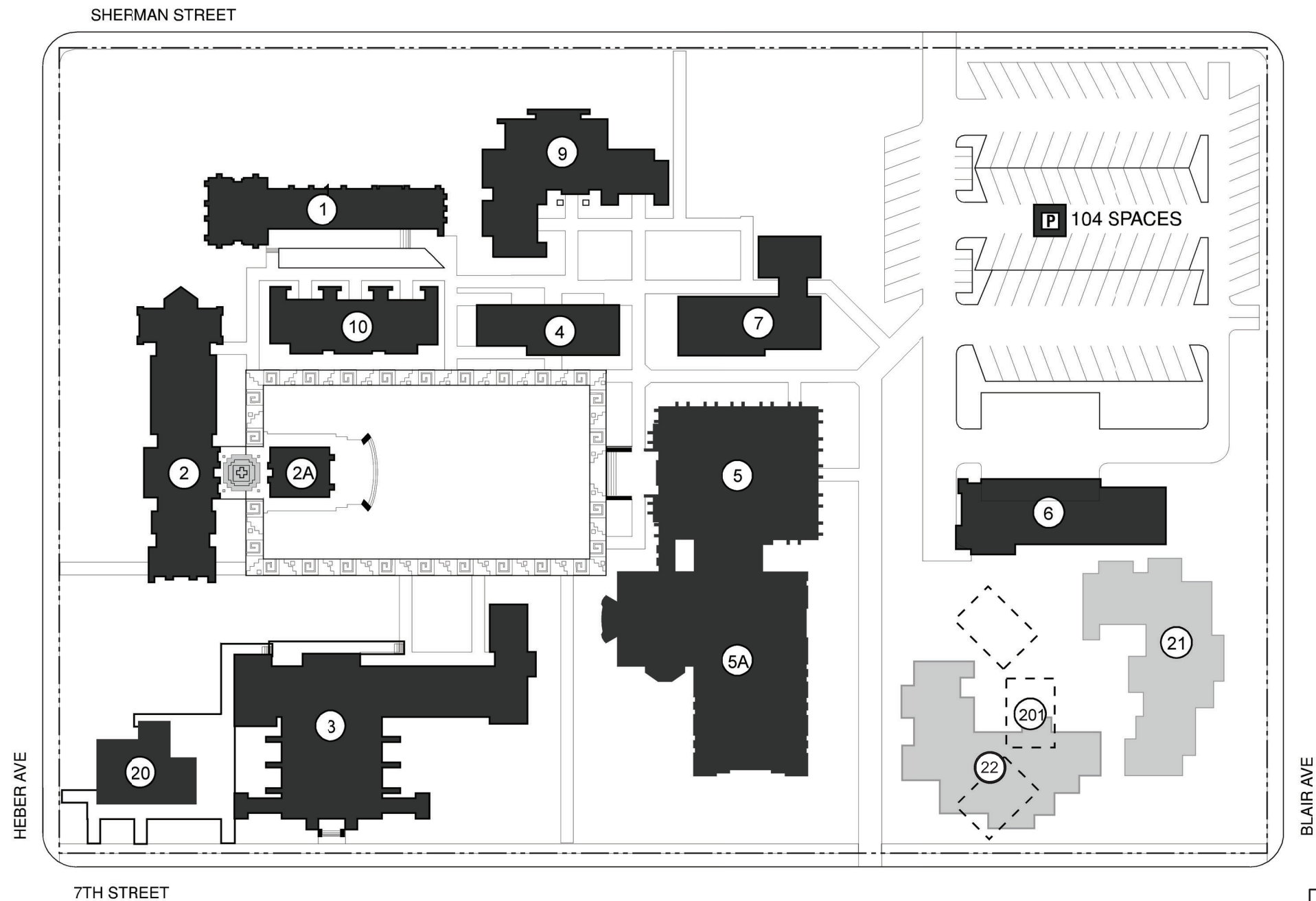
FIGURE 1
Regional Map



SOURCE: AERIAL-ESRI MAPPING SERVICE 2023; DEVELOPMENT-SDSU 2024

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

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

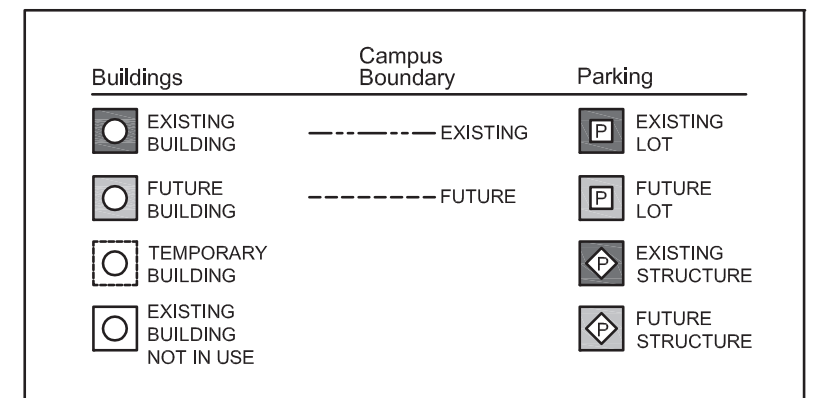


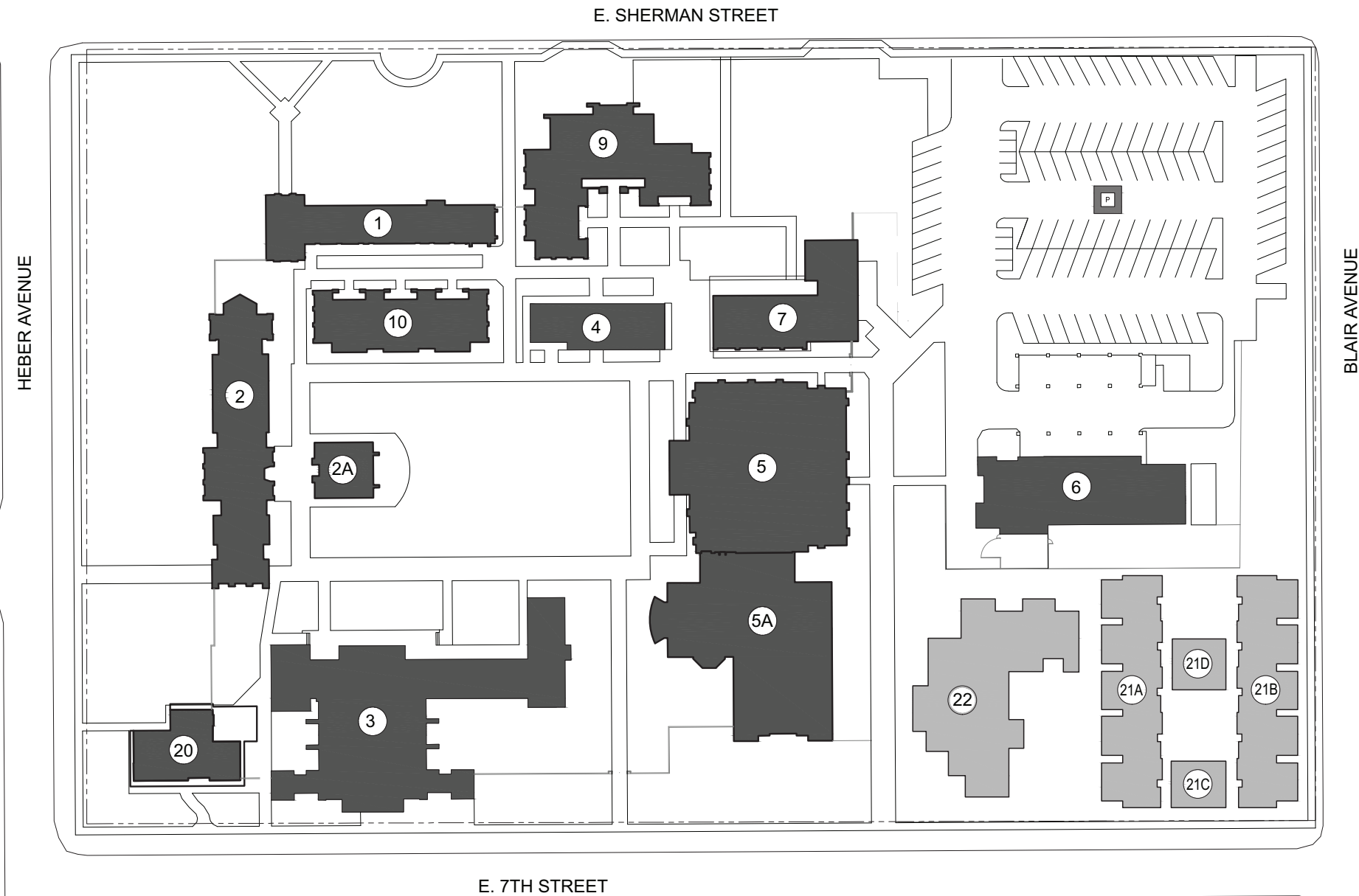
FIGURE 3A
Existing Campus Master Plan

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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-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

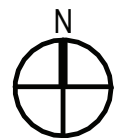
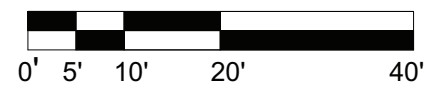
Buildings		Campus Boundary	Parking	
	EXISTING BUILDING	----- EXISTING		EXISTING LOT
	FUTURE BUILDING	----- FUTURE		FUTURE LOT
	TEMPORARY BUILDING			EXISTING STRUCTURE
	EXISTING BUILDING NOT IN USE			FUTURE STRUCTURE

FIGURE 3B
Proposed Campus Master Plan

Z:\Projects\1546401\MAPDOC\DOCUMENT\TTO05 Calexico Campus\Tech Reports\All Tech Figs 1-4

LEGEND

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



SOURCE: SDSU 2024

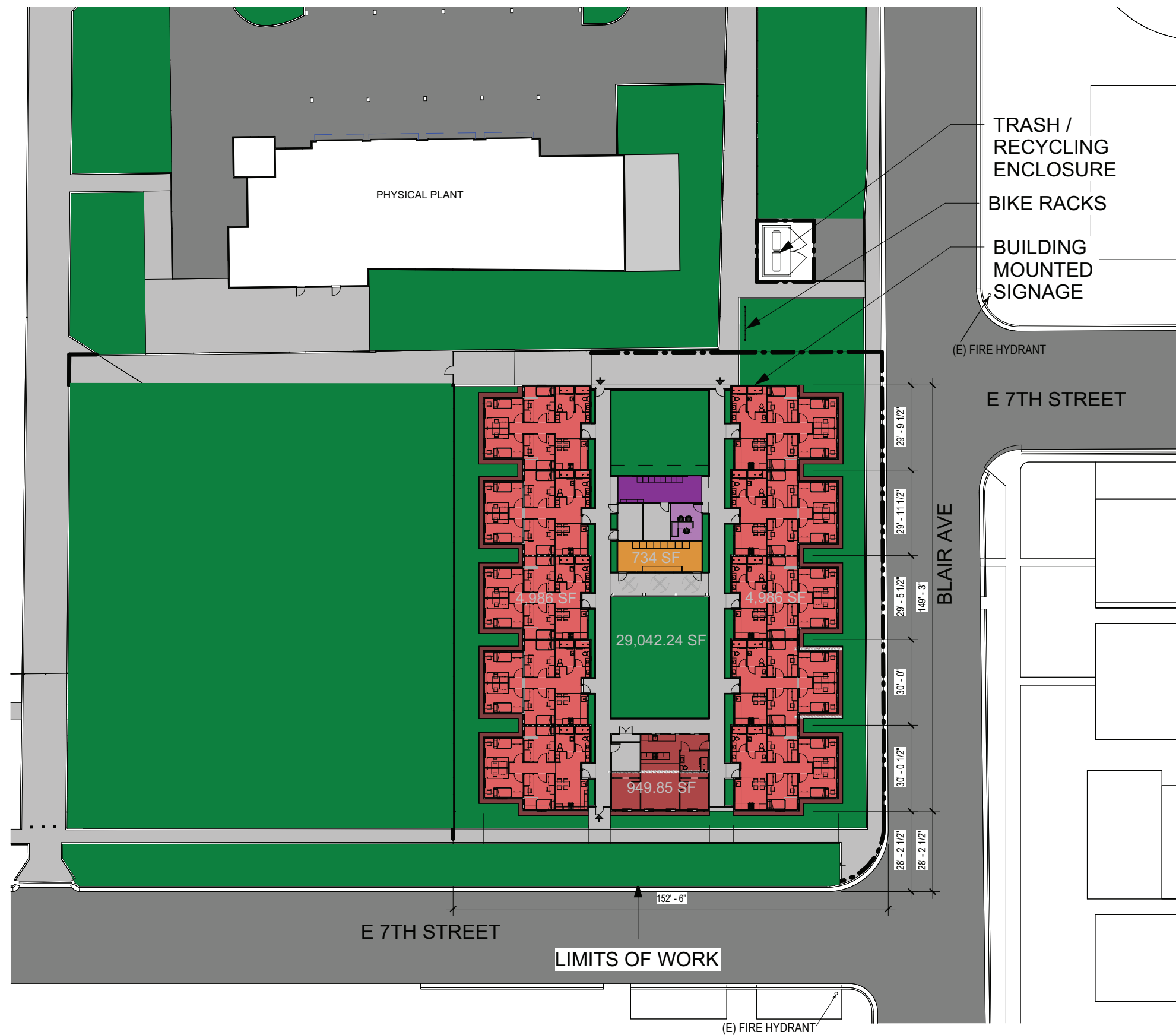


FIGURE 4
Site Plan

Confidential Attachment B

SCIC Records Search Results

Attachment C

NAHC Sacred Lands Search Results

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission

1550 Harbor Blvd, Suite 100

West Sacramento, CA 95691

916-373-3710

916-373-5471 – Fax

nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: San Diego State University Calexico Student Housing Project (PN # 15464)

County: Imperial County

USGS Quadrangle Name: 7.5-Minute Series Calexico and Heber Quadrangle

Township: 17S **Range:** 14E **Section(s):** 13

Company/Firm/Agency: Dudek

Street Address: 605 Third Street

City: Encinitas **Zip:** 92024

Phone: 760.479.4827

Fax: 760.632.0164

Email: mmurillo@dudek.com & apham@dudek.com

Project Description:

The Project includes the expansion and improvement of the San Diego State University (SDSU) Imperial Valley Campus (IVC), which includes the Off-Campus Center at Calexico and the Brawley Off-Campus Center. SDSU proposes construction and operation of a four-building complex that would support affordable student housing on the Calexico Campus. The proposed complex would be approximately 12,000 gross square feet.



NATIVE AMERICAN HERITAGE COMMISSION

June 28, 2024

Makayla Murillo
DudekVia Email to: mmurillo@dudek.comCHAIRPERSON
Reginald Pagaling
ChumashVICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
NomlakiSECRETARY
Sara Dutschke
MiwokPARLIAMENTARIAN
Wayne Nelson
LuiseñoCOMMISSIONER
Isaac Bojorquez
Ohlone-CostanoanCOMMISSIONER
Stanley Rodriguez
KumeyaayCOMMISSIONER
Laurena Bolden
SerranoCOMMISSIONER
Reid Milanovich
CahuillaCOMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño IndiansEXECUTIVE SECRETARY
**Raymond C.
Hitchcock**
Miwok, NisenanNAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov**Re: San Diego State University Calexico Student Housing (PN # 15464) Project, Imperial County**

To Whom It May Concern:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Torres-Martinez Desert Cahuilla Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Murphy.Donahue@NAHC.ca.gov

Sincerely,

*Murphy Donahue*Murphy Donahue
Cultural Resources Analyst

Attachment

Attachment D

Assembly Bill 52 Outreach Letter Example



SAN DIEGO STATE
UNIVERSITY

Planning, Design and Construction
Business and Financial Affairs
5500 Campanile Drive
San Diego CA 92182 · 1624
Tel: 619 · 594 · 5224
Fax: 619 · 594 · 4500

July «XX», 2024

«COMPANYORGANIZATION»

«ADDRESS»

«CITY» «STATE» «ZIP»

Re: Notification of the Proposed SDSU Calexico Off-Campus Center Affordable Student Housing Project Pursuant to California Assembly Bill 52.

Dear «COMPANYORGANIZATION»

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU Calexico Off-Campus Center Affordable Student Housing Project (proposed project), located in the City of Calexico (city), Imperial County, California. SDSU is reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

Project Location

The proposed project is located within the SDSU Imperial Valley Off-Campus Center – Calexico at 720 Herber Avenue in downtown Calexico, approximately 0.5 miles north of United States-Mexico border (Figure 1, Records Search Map). The Off-Campus Center is bordered by four City of Calexico Streets: Heber Avenue to the west; Sherman Street to the north; Blair Avenue to the east; and Seventh Street to the south. Residential uses bound the Off-Campus Center to the north, east, south, and west. Other surrounding uses include Calexico High School, located northeast of the Off-Campus Center, and Calexico City Hall, located immediately south of the Off-Campus Center. The proposed project falls within Section 13 of Township 17 South, Range 14 East of the Calexico and Herber, California 7.5-minute Quadrangles, as mapped by the U.S. Geological Survey. The project is located at the southeast corner of the Off-Campus Center and consists of vacant land that has been previously graded and is relatively flat.

Project Description

The proposed project is the construction and operation of a four-building housing complex that would provide affordable housing for approximately 80 students attending the SDSU Calexico Off-Campus Center and the nearby Imperial Valley College. The building complex would include three student housing buildings, including one smaller live-in unit building, and a community building.

If you have any comments or concerns regarding tribal cultural resources (as defined in California Public Resources Code section 21074) in relation to the proposed project, please provide a written request for consultation to Kara Peterson, Director of Planning, SDSU Planning, Design & Construction via email at kara.peterson@sdsu.edu or via hard copy mail to Ms. Peterson at San Diego State University, 5500 Campanile Drive, San Diego, California 92182-1624. The California Native American tribe has **30 days** of receipt of this notice to request consultation pursuant to California Public Resources Code section 21080.3.1. Please include the name of a designated lead contact person. If you have any questions, please don't hesitate to contact Ms. Peterson.



SAN DIEGO STATE
UNIVERSITY

Planning, Design and Construction

Business and Financial Affairs

5500 Campanile Drive

San Diego CA 92182 · 1624

Tel: 619 · 594 · 5224

Fax: 619 · 594 · 4500

Sincerely,

Kara Peterson
Director of Planning
Planning, Design & Construction

Att: Figure 1. Records Search Map