

**DRAFT**

**Initial Study & Environmental Analysis  
for**

**Zone Change #24-03  
General Plan Amendment #24-02  
Specific Plan Amendment #26-01  
Tentative Tract Map #26-01  
Site Plan #26-04**

# **BRAWLEY GATEWAY MIXED USE MASTER PLAN DEVELOPMENT**



**City of Brawley**

383 Main Street  
Brawley, CA 92227  
(760) 344-2222

**JUNE 2026**



**City of Brawley  
Initial Study/Environmental Checklist**

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**JUNE 2026**

1. **Project Title** Zone Change (ZC) #24-03 / General Plan Amendment (GPA) #24-02 / Specific Plan Amendment (SPA) #26-01 / Tentative Tract Map (TTM) #26-01 / Site Plan (SP) #26-04 – Brawley Gateway Mixed Use Master Plan Development (a.k.a. “YK America”)
  
2. **Lead agency name and address:**

**City of Brawley**  
383 Main Street  
Brawley, CA 92227

Contact: Cristhian Barajas, Development Services Director  
(760) 344-8822  
[cristhian.barajas@brawley-ca.gov](mailto:cristhian.barajas@brawley-ca.gov)
  
3. **Property Owner:** Thomas R. & Lucy Church, Co-Trustees et al.
  
4. **Project Developer:** Pacific Anchor Holdings, LLC
  
5. **Project Representative:** David Wang, Senior Project Manager (YK America)
  
6. **Legal Description:** LOT 16 BRAWLEY GATEWAY-UNIT 1 CITY OF BRAWLEY  
66.29 AC  
  
**APN: 048-440-001**
  
7. **Project Location:** SE Corner of Highway 86 & Legion Road
  
8. **Project Description:** The Brawley Gateway Mixed Use Master Plan Development consists of a Zone Change (ZC #24-03), General Plan Amendment (GPA #24-02), Specific Plan Amendment (SPA #26-01), Tentative Major Subdivision (i.e., Tract) Map (TTM #26-01), and Site Plan (#26-04) within the Brawley Gateway Specific Plan Area. ZC #24-03, GPA #24-02, and SPA #26-01 propose to rezone a 66-acre lot along the southern edge of the City of Brawley currently zoned as C-P (Service & Professional), C-2 (Medium Commercial), and M-1 (Light Manufacturing). The project site is currently utilized for agricultural purposes and is located within the Gateway Specific Plan area. The proposed rezone would divide the lot between a C-2 zone on the west and an R-3 (Residential Medium Density) zone on the east. The C-P and M-1 zones would be eliminated, as well as the alternate zoning designations provided in the current Gateway Specific Plan. The rezone is consistent with existing land uses within the project vicinity and the proposed land uses in the Rancho Los Lagos (RLL) annexation directly south of the project site. The area of this lot designated Commercial (C) in the General Plan,

while the Business Park/Light Industrial (BP) area would be removed entirely. The Medium Density Residential (MR) General Plan Land Use designation would also be added to the eastern portion of the site. City Zoning Maps, General Plan Land Use Maps, and Specific Plan Exhibits/Figures will be edited in accordance with these changes. TTM #26-01 proposes subdividing the western (commercial) portion of the site into eleven (11) lots and the eastern (residential) portion of the site into three (3) lots. Pursuant to Section 23A.10 of the Municipal Code and Articles XVI, XVII, and XVIII of the City Zoning Ordinance, the Planning Commission must review the findings within the Brawley Mixed Use Master Plan Development project documents for consistency with adopted regulations and make recommendations to City Council for approval, conditional approval, or disapproval of ZC #24-03; GPA #24-02; SPA #26-01; TTM #26-01; SP #26-04; and the Mitigated Negative Declaration.

**9. General Plan Land Use Designation:**

**Existing City General Plan:** Special Study Area (Gateway SP)

**Areas 3-5:** Commercial (C)

**Areas 6-9:** Business Park/Light Industrial (BP)

**Proposed City General Plan:** Special Study Area (Gateway SP)

**West Portion:** Commercial (C)

**East Portion:** Medium Density Residential (MR)

**10. Specific Plan Land Use Designation:**

**EXISTING GATEWAY SPECIFIC PLAN**

**Area 3:** Retail Commercial

**Areas 4-5:** Office Commercial

**Areas 6-9:** Industrial

**PROPOSED GATEWAY SPECIFIC PLAN**

**West Portion:** Retail Commercial

**East Portion:** Multi-family Residential

**11. City Zoning:**

**Proposed Annexed Territory:** N/A

**Existing City Zoning:** C-P (Service & Professional)  
C-2 (Medium Commercial)  
M-1 (Light Manufacturing)

**Proposed City Zoning:** C-2 (Medium Commercial)  
R-3 (Residential Medium Density)

**12. Specific Plan Zoning:**

**EXISTING GATEWAY SPECIFIC PLAN**

**Area 3:** C-2 (Medium Commercial)  
*Alternative:* M-1 (Light Manufacturing)

**Area 4:** C-P (Service & Professional)  
*Alternative:* M-1 (Light Manufacturing)

**Area 5:** C-P (Service & Professional)  
*Alternative:* M-1 (Light Manufacturing)

**Area 6:** M-1 (Light Manufacturing)

**Area 7:** M-1 (Light Manufacturing)  
*Alternative:* C-2 (Medium Commercial)  
*Alternative:* C-3 (Heavy Commercial)

**Area 8:** M-1 (Light Manufacturing)

**Area 9:** M-1 (Light Manufacturing)

**PROPOSED GATEWAY SPECIFIC PLAN**

**West Portion:** C-2 (Medium Commercial)  
*no alternatives*

**East Portion:** R-3 (Residential Medium Density)  
*no alternatives*

**13. Surrounding Land:**

<b>North</b>	C-2 (Medium Commercial);	Gas Station / Vacant
	R-3 (Residential Medium Density);	Vacant
	P-F (Public Facilities);	Retention Basin
<b>South</b>	A-1 (Light Agriculture);	Agriculture / Future RLL
	P-F (Public Facilities);	IID Canal Infrastructure
<b>East</b>	R-1 (Residential Single Family);	Vehicle Storage / Agriculture / Vacant
<b>West</b>	C-P (Service & Professional);	Church/Vacant/Medical
	C-3 (Heavy Commercial);	Mini-Storage
	Transportation:	Highway 86 expressway

**14. Other Agencies whose approval is required: (e.g., permits, financing approval, or participation agreement)**

- a) Building
- b) Fire
- c) Public Works
- d) Imperial Irrigation District

**15. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1?**

AB 52 and SB 18 consultation letters to tribal contacts were mailed out to tribal contacts provided by the NAHC. Native American tribes traditionally and/or culturally affiliated with the project area either stated that they did not wish to comment or did not respond to letters requesting comments. The project developer will be required to have Native American monitoring during project construction. Tribal consultation shall be conducted in the case of the discovery of a tribal resource during ground-disturbing activities.

# EXHIBIT A Vicinity Map/Project Location

APN: 048-440-001



**INTRODUCTION:**

This Initial Study (IS) has been prepared by the City of Brawley, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The purpose of this Initial Study is to determine whether the Brawley Mixed Use Master Plan Development may have a significant effect on the environment and to identify mitigation measures that would reduce any potentially significant impacts to a less-than-significant level. This Initial Study is based on technical analyses prepared for the project, including air quality, biological resources, noise, transportation and vehicle miles traveled (VMT), and cultural resources studies.

**PROJECT DESCRIPTION:**

This Brawley Gateway Mixed Use Master Plan Development project proposes a Zone Change (ZC #24-03), amendments to the City of Brawley General Plan (GPA #24-02) and Brawley Gateway Specific Plan (SPA #26-01), a Tentative Major Subdivision/Tract Map (TTM #26-01), and a Site Plan (SP #26-04) to allow development of a mixed-use project on an approximately 66-acre site located within the City of Brawley. The project site is currently utilized for agricultural purposes and is identified as Lot 16 of Brawley Gateway Unit 1. The Assessor's Parcel Number (APN) for this site is 048-440-001.

According to the Brawley Zoning Map, the zoning designations for the project site are C-P (Service & Professional), C-2 (Medium Commercial), and M-1 (Light Manufacturing). The Brawley Gateway Specific Plan also includes M-1, C-2, and C-3 (Heavy Commercial) as alternative zoning designations for some portions of the site. The proposed rezone would divide the site into an eastern portion zoned R-3 (Residential Medium Density) and C-2 (Medium Commercial), with any C-P, C-3, and M-1 designations being eliminated. Figures within the Brawley Gateway Specific Plan will be amended to reflect these modifications and eliminations of corresponding land uses. The Brawley General Plan will also be amended to reflect the elimination of the Business Park/Light Industrial (BP) land use designation within the project area, as well as the addition of the Medium Density Residential (MR) designation and the expansion of the Commercial (C) designation. The rezone is consistent with existing land uses within the project vicinity as well as the proposed land uses in the Rancho Los Lagos (RLL) Specific Plan, intended for future annexation directly south of the project site.

The eastern portion of the site, approximately 29 acres, would allow development of up to 408 multi-family residential units with amenities, open space, and parking. The submitted Tentative Tract Map proposes subdividing this portion of the site into three (3) lots. The western portion of the site, approximately 37 acres, would be subdivided into 11 commercial lots intended to accommodate a variety of commercial uses, including retail development and a hotel with approximately 100 rooms.

Primary access to the project site would be provided from Legion Road along the northern boundary. Additional circulation includes a future roadway connection along the southern boundary of the site, which would require construction adjacent to the Rockwood Canal, subject to coordination and approval by the Imperial Irrigation District and other applicable agencies.

**ENVIRONMENTAL SETTING:**

The project site is located within City limits and is designated for urban development under the City of Brawley General Plan and Gateway Specific Plan. Surrounding land uses include existing and planned commercial development to the west and north, agricultural land to the east and south, and State Route 86 along the western boundary. The vacant land north of the eastern portion of the site is proposed for multifamily residential development. Vacant and agricultural land to the east of the site has been zoned for single-family residential development. The site is generally flat and actively farmed, with irrigation provided by the Rockwood Canal along the site's southern boundary. Canals along the north and west have been undergrounded.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

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

	Aesthetics	X	Agriculture/Forestry Resources		Air Quality
X	Biological Resources		Cultural Resources		Geology/Soils
	Greenhouse Gas Emissions		Hazards and Hazardous Materials	X	Hydrology/Water Quality
	Land Use Planning		Mineral Resources		Noise
X	Population/Housing		Public Services		Recreation
	Transportation		Utilities/Service Systems		Mandatory Findings of Significance
	Energy		Tribal Cultural Resources		Wildfire



- 3) Once the lead agency has determined that a particular physical impact may occur then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact’ is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 17, “Earlier Analysis,” may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

**Authority:** *Public Resources Code Sections 21083 and 21087. Reference: Public Resources Code Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151; Sundstrom v. County of Mendocino, 202 Cal. App. 3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal. App. 3d 1337 (1990).*
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

<b>I. AESTHETICS</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Have a substantial adverse effect on a scenic vista?			<b>X</b>	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			<b>X</b>	
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings?			<b>X</b>	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			<b>X</b>	

### I. AESTHETICS IMPACT DISCUSSION

The project would convert agricultural land to urban development, introducing new buildings, roadways, and landscaping. Development standards contained in the Gateway Specific Plan and the Brawley Zoning Ordinance regulate design, landscaping, and site layout. Visual impacts would be consistent with planned urban development in the Gateway District, as previously identified in the District's environmental review documents. Impacts would be less than significant.

<b>II. AGRICULTURE AND FORESTRY RESOURCES</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?			<b>X</b>	
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				<b>X</b>

<b>II. AGRICULTURE AND FORESTRY RESOURCES</b> <b>(continued)</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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))?				<b>X</b>
d) Result in the loss of forest land or conversion of forest land to non-forest use?				<b>X</b>
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?		<b>X</b>		

**II. AGRICULTURE AND FORESTRY RESOURCES DISCUSSION**

The project would result in the conversion of agricultural land to urban uses. The project site is designated for urban development under the General Plan and Gateway Specific Plan. While the conversion of agricultural land represents a change in land use, it would not result in an additional significant impact to agricultural resources when evaluated in the context of adopted planning documents. Although the project will be developed in the conversion of farmland to non-agricultural use, the adopted Gateway Specific Plan environmental analysis originally accounted for the transformation of agricultural land into urban development. However, mitigation will require the project to carry out construction so that no damage or loss of essential agricultural irrigation or water infrastructure occurs, thereby affecting nearby agricultural uses. Furthermore, the project site's land is not under a Williamson Act Contract, nor is it surrounded by any such land. With the aforementioned mitigation, impacts would be less than significant.

<b>III. AIR QUALITY</b> – <i>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.</i>  <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with or obstruct implementation of the applicable air quality plan?			<b>X</b>	

<b>III. AIR QUALITY</b> <b>(continued)</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				<b>X</b>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			<b>X</b>	
d) Expose sensitive receptors to substantial pollutant concentrations?			<b>X</b>	
e) Create objectionable odors affecting a substantial number of people?			<b>X</b>	

### III. AIR QUALITY DISCUSSION

An Air Quality Assessment was prepared for the project to evaluate construction and operational emissions. Construction activities would generate temporary emissions of criteria air pollutants and fugitive dust. Maximum daily construction emissions would not exceed Imperial County Air Pollution Control District (ICAPCD) thresholds with implementation of mitigation measures.

Operational emissions associated with vehicle trips and energy use would not exceed applicable thresholds and would not obstruct implementation of the Air Quality Attainment Plan for Imperial County.

#### *Mitigation Measures:*

##### **MM-AQ-1**

Fugitive Dust Control:

Implement ICAPCD-required dust control measures during construction.

##### **MM-AQ-2**

Construction Equipment Emissions:

Limit idling, maintain equipment, and utilize best available control technologies where feasible.

With implementation of these measures, air quality impacts would be reduced to less than significant.

<b>IV. BIOLOGICAL RESOURCES</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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 Game or U.S. Fish and Wildlife Service?		X		
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 Game or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

#### IV. BIOLOGICAL RESOURCES DISCUSSION

A Biological Resources Assessment determined that the project site consists primarily of active agricultural land with limited habitat value. No sensitive natural communities or special-status species were observed during site surveys. The project area is within potential habitat for the western burrowing owl.

*Mitigation Measures:*

- MM-BIO-1**  
Jurisdictional Resources: Complete a formal aquatic resources delineation prior to grading and obtain any required permits if impacts to jurisdictional waters cannot be avoided.
- MM-BIO-2**  
Burrowing Owl Protection: Conduct pre-construction surveys and implement avoidance and buffer measures consistent with CDFW guidance.
- MM-BIO-3**  
Bat Roosting Habitat: Conduct bat roost assessments prior to removal of palm trees, if applicable.

With implementation of these measures, impacts to biological resources would be reduced to less than significant.

<b>V. CULTURAL RESOURCES</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?			<b>X</b>	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			<b>X</b>	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			<b>X</b>	
d) Disturb any human remains, including those interred outside of formal cemeteries?			<b>X</b>	

**V. CULTURAL RESOURCES DISCUSSION**

A Cultural Resources Assessment and records search were conducted for the project site. No historical or archaeological resources were identified. The project would not result in a significant impact to cultural resources.

*Mitigation Measures:*

**MM-CUL-1**

Inadvertent Discovery:

If cultural resources are discovered during construction, work shall cease and a qualified archaeologist shall evaluate the find in accordance with CEQA and State requirements.

**VI. ENERGY**

The project would comply with Title 24 and CALGreen requirements. Project energy features would therefore have a less than significant impact.

<b>VII. GEOLOGY AND SOILS</b>  <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			<b>X</b>	
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?			<b>X</b>	
ii. Strong Seismic ground shaking?			<b>X</b>	
iii. Seismic-related ground failure, including liquefaction?			<b>X</b>	
iv. Landslides?				<b>X</b>
b) Result in substantial soil erosion or the loss of topsoil?			<b>X</b>	
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 landslides, lateral spreading, subsidence, liquefaction or collapse?			<b>X</b>	

<b>VII. GEOLOGY AND SOILS</b> <i>(continued)</i> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			<b>X</b>	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			<b>X</b>	

**VII. GEOLOGY AND SOILS DISCUSSION**

A geotechnical report will provide the appropriate design methods to ensure health and safety and reduce the risk of structure failure. No unusual geological hazards are identified. Compliance with CBC required.

<b>VIII. GREENHOUSE GAS EMISSIONS</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			<b>X</b>	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			<b>X</b>	

**VIII. GREENHOUSE GAS EMISSIONS DISCUSSION**

The project would generate greenhouse gas emissions from construction activities and vehicle trips associated with future development. The project is consistent with regional growth assumptions and would not conflict with any applicable greenhouse gas reduction plans.

*Mitigation Measures:*

**MM-GHG-1**

Energy Efficiency and Transportation Measures:

Implement applicable ICAPCD, Title 24, and CALGreen requirements.

<b>IX. HAZARDS AND HAZARDOUS MATERIALS</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			<b>X</b>	
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			<b>X</b>	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			<b>X</b>	
d) Be located on a site, which 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?				<b>X</b>
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 for people residing or working in the project area?			<b>X</b>	
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			<b>X</b>	
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			<b>X</b>	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			<b>X</b>	

## IX. HAZARDS AND HAZARDOUS MATERIALS DISCUSSION

The project site is not currently listed as a site containing hazardous materials. Standard construction practices and stop work protocols apply to mitigate any significant impacts.

<b>X. HYDROLOGY AND WATER QUALITY</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Violate any water quality standards or waste discharge requirements			<b>X</b>	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				<b>X</b>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			<b>X</b>	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				<b>X</b>
e) 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?		<b>X</b>		
f) Otherwise substantially degrade water quality?			<b>X</b>	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				<b>X</b>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				<b>X</b>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				<b>X</b>
j) Inundation by seiche, tsunami, or mudflow?				<b>X</b>

**X. HYDROLOGY AND WATER QUALITY DISCUSSION**

Development of the project site would increase impervious surface area, potentially affecting runoff and water quality. The project would comply with all applicable City of Brawley, Regional Water Quality Control Board, and State requirements. A preliminary analysis indicates that the existing infrastructure may be able to accommodate the project's water discharge needs. However, the project is required to provide confirmation that the nearby regional detention basin has adequate capacity to support project needs.

*Mitigation Measures:*

- MM-HYD-1**  
Stormwater Management: Prepare and implement a SWPPP and Best Management Practices for water quality.
- MM-HYD-2**  
Construction Controls: Implement erosion and sediment control measures during grading.

With mitigation, impacts would be less than significant.

<b>XI. LAND USE/PLANNING</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Physically divide an established community?				<b>X</b>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				<b>X</b>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				<b>X</b>

**XI. LAND USE/PLANNING DISCUSSION**

The project is consistent with the Brawley Gateway Specific Plan and General Plan overall goals. It will require a Zone Change, General Plan Amendment, and Specific Plan Amendment to ensure zoning consistency.

<b>XII. MINERAL RESOURCES</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?				<b>X</b>
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?				<b>X</b>

## XII. MINERAL RESOURCES DISCUSSION

There are no known mineral resources in the project area.

<b>XIII. NOISE</b>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Would the project involve exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			<b>X</b>	
b) Would the project involve exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?			<b>X</b>	
c) Would the project involve a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			<b>X</b>	
d) Would the project involve a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			<b>X</b>	

<b>XIII. NOISE (continued)</b>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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 expose people residing or working in the project area to excessive noise levels?				<b>X</b>
f) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				<b>X</b>

**XIII. NOISE DISCUSSION**

A Noise Assessment evaluated potential construction and operational noise impacts. Construction noise would be temporary and regulated by City standards. Operational noise from traffic and commercial uses would be compatible with surrounding land uses.

*Mitigation Measures:*

**MM-NOI-1**

Construction Noise Control:

Limit construction to permitted hours and use properly maintained equipment.

**MM-NOI-2**

Operational Noise Standards:

Design residential buildings, ancillary structures, and equipment to meet applicable interior and exterior noise standards.

With mitigation, impacts would be less than significant.

<b>XIV. POPULATION AND HOUSING</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?		<b>X</b>		
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				<b>X</b>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				<b>X</b>

**XIV. POPULATION AND HOUSING DISCUSSION**

Impacts on population are generally in line with local growth expectations, but the project still has the potential to directly induce substantial population growth in the area due to proposals for new businesses and residences. Indirect population growth is also possible due to infrastructure improvements along Mead Road, Legion Road, and Western Avenue. No housing exists on the lot at present. The project would provide new housing consistent with planning documents, as City staff anticipates the northern portion of the Gateway Specific Plan currently designated as residential use will undergo future zoning changes that will relocate the proposed housing within the Specific Plan to this site.

*Mitigation Measures:*

**MM-POP-1**

Project Phasing:

Developer will phase project to induce gradual growth and will implement necessary improvements to nearby infrastructure, such as roads and sidewalks.

With mitigation, impacts would be less than significant.

<b>XV. PUBLIC SERVICES</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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:			<b>X</b>	
1. Fire Protection?			<b>X</b>	
2. Police Protection?			<b>X</b>	
3. Schools?			<b>X</b>	
4. Parks?			<b>X</b>	
5. Other Public Facilities?			<b>X</b>	

**XV. PUBLIC SERVICES DISCUSSION**

The proposed project will require Fire and Police services but will not have a significant impact. Adequate services are available with development conditions. Additionally, the development has identified dedicated areas on the site for future Public Facilities use.

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

**XVI. RECREATION DISCUSSION**

On-site amenities are provided, including centrally located parks in the multifamily residential portion, and a multi-purpose trail adjacent to Caltrans right-of-way on the western edge of the development, connecting to other nearby development.

<b>XVII. TRANSPORTATION AND TRAFFIC</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			<b>X</b>	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			<b>X</b>	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			<b>X</b>	
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			<b>X</b>	
e) Result in inadequate emergency access?			<b>X</b>	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			<b>X</b>	

## XVII. TRANSPORTATION AND TRAFFIC DISCUSSION

A Transportation Impact Analysis and Vehicle Miles Traveled study were prepared for the project. The project is forecast to generate approximately 15,150 daily vehicle trips. The analysis determined that the project would not result in significant transportation impacts under SB 743. Local circulation improvements would be implemented as conditions of approval.

### *Mitigation Measures:*

#### **MM-TRAF-1**

Roadway Improvements:

Implement required roadway, signal, and access improvements.

Transportation impacts would be less than significant.

## XVIII. TRIBAL CULTURAL RESOURCES

In accordance with AB 52 and SB 18, mail and electronic communications were initiated with tribes culturally affiliated with the project site. Letters were mailed out to culturally affiliated tribes on August 15, 2025. Only the Ft. Yuma Quechan Tribe responded to the City during the AB 52 and SB 18 consultation periods, with the tribe stating that they did not wish to comment on this project.

The Cultural Resource study prepared for this project acknowledged the potential for unknown tribal cultural resources to be unearthed during project construction. In addition to the mitigation measures established for general cultural resources, mitigation measures have also been proposed to reduce potential impacts on unknown tribal cultural resources to less than significant.

### *Mitigation Measures:*

#### **MM-TCR-1**

Tribal Cultural Resources:

If tribal cultural resources are identified, the City shall coordinate with affiliated tribes regarding appropriate treatment.

#### **MM-TCR-2**

Tribal Cultural Monitor:

A Tribal Cultural Monitor shall be on site for ground disturbing activities, and culturally affiliated tribes shall be consulted in the event of new developments, such as the inadvertent discovery of cultural artifacts, cremation sites, or human remains.

<b>XIX. UTILITIES AND SERVICE SYSTEMS</b> <i>Would the project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			<b>X</b>	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			<b>X</b>	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			<b>X</b>	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			<b>X</b>	
e) Result in a determination by the wastewater 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?			<b>X</b>	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			<b>X</b>	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			<b>X</b>	

### **XIX. UTILITIES AND SERVICE SYSTEMS DISCUSSION**

The project would be served by existing City water, wastewater, and solid waste facilities. Any infrastructure improvements required to serve the project would be implemented as part of development.

### **XX. WILDFIRE**

The project is located in an urban area and is not located in any known Fire Hazard Severity Zone.

## MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Does the project have the potential to 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, 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?			<b>X</b>	
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)?			<b>X</b>	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			<b>X</b>	

Although the project is situated within the context of regional and local growth, such as the proposed Lithium Valley Specific Plan, the Rancho Los Lagos annexation, Wal-Mart expansion, nearby commercial and residential growth within the Brawley Gateway District and the Latigo Ranch areas, nothing unique about the proposed rezone for this project deviates from the intent to develop the site per the Brawley Gateway Specific Plan and relevant environmental studies, that would result in additional mandatory findings of significance.

## **CONCLUSION**

Based on the analysis contained in this Initial Study, the City of Brawley finds that the project could have a significant effect on the environment; however, with incorporation of the mitigation measures identified herein, all potentially significant impacts would be reduced to a less-than-significant level. Therefore, a Mitigated Negative Declaration has been prepared for the project.

## **PERSONS AND ORGANIZATIONS CONSULTED**

Brawley Public Works Department  
Brawley Fire Department  
Imperial Irrigation District

## **REFERENCES**

2025 California Fire Code  
2008 General Plan EIR  
2004 Addendum to the Mitigated Negative Declaration for the Brawley Gateway Specific Plan