

MEMORANDUM

April 22, 2025

Cynthia Mancha
City of Brawley
Development Services, Planning Division
383 Main Street
Brawley, CA 92227

Subject: Brawley Mixed Use Master Plan Project, Brawley, California – Cultural Resources Evaluation (Revised Conceptual Site Plan)

PURPOSE

This memorandum serves to evaluate changes made to the Conceptual Site Plan for the proposed Brawley Mixed Use Master Plan Project (proposed Project) located in the City of Brawley (City), California. The Site Plan was recently revised, subsequent to preparation of the *Cultural Resource Identification Memorandum for the Mixed Use Master Plan Project, City of Brawley, Imperial County, California*, dated October 31, 2024. The minor changes to the Conceptual Site Plan are the basis for this memorandum which is intended to evaluate potential short- and long-term impacts on cultural resources that would result from construction and operation of the proposed Project, pursuant to California Environmental Quality Act requirements. The evaluation is aimed at determining whether the significance findings identified in the original technical cultural resources memorandum remain valid, or if new or substantially increased impacts would result.

REVISED PROJECT DESCRIPTION

The proposed Project would require City approval of an amendment to the Brawley Gateway Specific Plan to subdivide the subject property and allow for future commercial and multi-family residential uses; refer to Figure 1, Conceptual Site Plan. As currently proposed, the western portion of the property (approximately 37 acres) would still be subdivided for future commercial development, including strip retail plaza and larger retail shopping center uses. As compared to the original Site Plan, the revised Site Plan would reduce the square footage of the proposed retail shopping plaza uses from approximately 85,000 square feet (SF) to 65,500 SF (Pads 1 to 8); the square footage of the retail shopping center uses would be increased from approximately 240,000 SF (originally Pads 10 thru 12) to 243,000 SF (now Pads 10 and 11). The revised Site Plan would also increase the number of rooms proposed for the commercial hotel from approximately 100 rooms to 150 rooms (Pad 9). Proposed access to the commercial use area would still be from (future) Legion Road to the north, with secondary access occurring from the south along a future/unnamed road.

Under the revised Site Plan, the eastern portion of the property (approximately 29 acres) would still be subdivided to allow for future development of 408 multi-family residential units and associated community amenities, with an estimated 836 parking spaces. Total square footage of the residential uses would be reduced from approximately 411,744 SF to 273,288 SF with the revised Site Plan. Proposed primary and secondary access to the residential area would remain from (future) Legion Road to the north (to be improved to centerline of roadway); secondary access would still be via a future road along the eastern boundary.

EVALUATION

No change to the development footprint (limits of disturbance) as originally proposed would result with the revised Conceptual Site Plan. Although minor changes to design of the internal building pads and mixture and/or intensity of the proposed land uses would occur, the development footprint (total of approximately 66 acres) as evaluated in the October 2024 *Cultural Resource Identification Memorandum* would remain the same. As a result, no updates to the previously completed South Coastal Information Center records search, literature and historical map review, Native American Heritage Commission Sacred Lands File search, archaeological field survey, or buried archaeological site sensitivity analysis prepared as part of the *Cultural Resource Identification Memorandum* are required to evaluate new land areas or potential cultural resources not already considered.

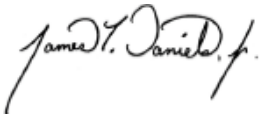
As the extent of the land area affected by the proposed Project has not changed, potential impacts resulting with future development of the site and associated mitigation measures to reduce such impacts to less than significant, as identified in the October 2024 *Cultural Resource Identification Memorandum*, remain applicable to the Project as currently proposed.

CONCLUSION

No new or substantially increased significant impacts relative to cultural resources would result with the revised Conceptual Site Plan. The significance findings and associated mitigation measures identified in the original *Cultural Resource Identification Memorandum* (October 2024) remain appropriate and applicable to the proposed Project.

Please feel free to contact me at (760) 208-0583 or at james.daniels@mbakerintl.com with any questions you may have regarding the results and/or conclusions of this report.

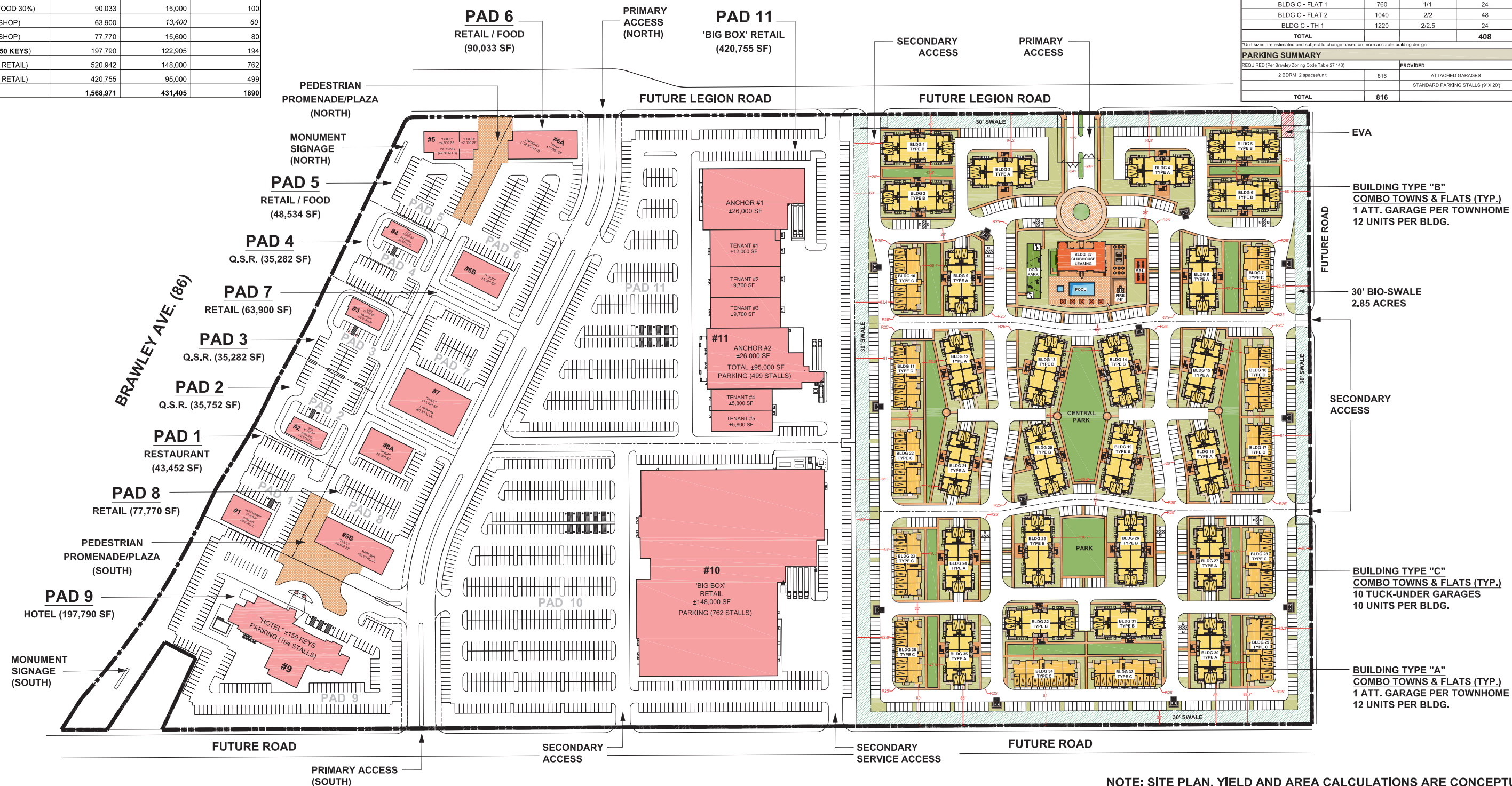
Sincerely,



James Daniels, MA, RPA
Senior Archaeologist

COMMERCIAL PAD SUMMARY TABLE				
SITE AREA		36 ACRES		
PAD SUMMARY				
PAD NUMBER	LOT SIZE (SF)	TOTAL BUILDING AREA (SF)	NO. OF PARKING PROVIDED	
#1 (RESTAURANT)	43,452	5,400	56	
#2 (Q.S.R.)	35,753	3,200	32	
#3 (Q.S.R.)	34,760	3,200	32	
#4 (Q.S.R.)	35,282	3,200	33	
#5 (RETAIL / FOOD 30%)	48,534	6,500	42	
#6 (RETAIL / FOOD 30%)	90,033	15,000	100	
#7 (RETAIL / SHOP)	63,900	13,400	60	
#8 (RETAIL / SHOP)	77,770	15,600	80	
#9 (HOTEL, 150 KEYS)	197,790	122,905	194	
#4 ('BIG BOX' RETAIL)	520,942	148,000	762	
#4 ('BIG BOX' RETAIL)	420,755	95,000	499	
TOTAL	1,568,971	431,405	1890	

APARTMENT SUMMARY TABLE				
SITE AREA		28.77 ACRES		
TOTAL UNITS		408 UNITS		
DENSITY		14.2 DU/AC		
APARTMENT UNIT SUMMARY				
UNIT PLAN	SQ. FT.	ROBA	# UNITS	TOTAL SF.
BLDG A - UNIT 1	760	1/1	48	36,480
BLDG A - UNIT 2A	1053	2/2	48	50,544
BLDG A - UNIT 2B (TH)	1200	2/2.5	48	57,600
BLDG B - UNIT 2A	1053	2/2	96	101,088
BLDG B - UNIT 2B (TH)	1200	2/2.5	48	57,600
BLDG C - CARRIAGE 1	715	1/1	24	17,160
BLDG C - FLAT 1	760	1/1	24	18,240
BLDG C - FLAT 2	1040	2/2	48	49,920
BLDG C - TH 1	1220	2/2.5	24	29,280
TOTAL			408	273,288
*Unit sizes are estimated and subject to change based on more accurate building design.				
PARKING SUMMARY				
REQUIRED (Per Brawley Zoning Code Table 27.143)		PROVIDED		
2 BDRM: 2 spaces/unit		816	ATTACHED GARAGES	216
			STANDARD PARKING STALLS (8' X 20')	620
TOTAL		816		836



NOTE: SITE PLAN, YIELD AND AREA CALCULATIONS ARE CONCEPTUAL AND SUBJECT TO CHANGE BASED ON MORE ACCURATE BOUNDARY DATA.