

PEER REVIEW

To:	Cynthia Mancha ( <a href="mailto:planning@brawley-ca.gov">planning@brawley-ca.gov</a> )	YK Master Plan Brawley Mixed Use Development Brawley Avenue and Legion Road Brawley, CA
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Date:	August 20, 2025	

KEY FINDINGS	
	<ul style="list-style-type: none"> <li>Development expected to have minor impact on surrounding transportation network; Less than significant VMT impact.</li> </ul>
	<ul style="list-style-type: none"> <li>Traffic signals recommended at S. Brawley Avenue &amp; Future Road and Future Legion Road &amp; Project Driveway #1.</li> </ul>

This memorandum was prepared to document our review of the transportation impact study (TIS) related to the YK America Master Plan which will include the proposed Brawley Mixed Use Development located in Brawley, California. The report prepared on April 22, 2025, by Michael Baker International, Inc., amends the January 2025 report.

**Traffic Impact Study Review and Requirements**

The updated TIS includes modified trip generation estimates and evaluates the potential delay, operations, and vehicle miles traveled (VMT) impacts associated with the mixed-use development. The analyses were conducted in accordance with the Local Mobility Assessment and California Environmental Quality Act (CEQA) guidelines.

Trip Generation

The updated TIS memorandum includes total estimated trips for the proposed mixed-use development. Modifications include a 50-room increase in lodging and 16,500 square foot reduction in commercial space. These changes result in lower daily and peak hour trips compared to the previous TIS submittal. The table below summarizes the trip generation based on the Institute of Transportation Engineers Trip Generation Manual, 11<sup>th</sup> Edition methodology for various land uses.

Land Use	Size	Daily	Weekday AM Peak			Weekday PM Peak		
			In	Out	Total	In	Out	Total
Hotel	150 Rooms	1,199	39	30	69	45	44	89
Multi-Family Residential	408 Units	2,750	39	124	163	131	77	208
Shopping Plaza	65,500 SF	4,423	70	43	113	167	173	340
Shopping Center	243,000 SF	8,993	127	77	204	397	429	826
<i>Pass-By Trips Reduction (34%)</i>		-3,058	-43	-26	-69	-135	-146	-281
<b>TOTAL TRIP GENERATION</b>		<b>14,307</b>	<b>232</b>	<b>248</b>	<b>480</b>	<b>605</b>	<b>577</b>	<b>1,182</b>

**Traffic Operations and Mitigation**

The updated TIS memorandum includes a Level of Service (LOS) analysis for the surrounding transportation network operations during the morning and evening peak hours. The analysis found that all study area intersections currently operate at acceptable levels of service and are projected to continue to operate acceptably in the future based on the proposed development mitigation. It should be noted that a section of S. Brawley Avenue from Malan Street to Wildcat Drive is expected to operate at LOS F under 2028 Plus Project conditions. This section has been built to its ultimate cross section; therefore, additional widening is not recommended. The table below summarizes the traffic operations by scenario.

Scenario Year	Operation	Traffic Issue/Mitigation
2024 Existing Conditions	Good	None/Not Recommended
2028 Opening Year Without Project Conditions	Good	None/Not Recommended
2028 Opening Year Plus Project Conditions	Good	None/Mitigation Includes: <ul style="list-style-type: none"> <li>New Traffic Signal at S. Brawley Avenue &amp; Future Road</li> <li>New Traffic Signal at Future Legion Road &amp; Project Driveway #1 (D1)</li> </ul>

### Vehicle Miles Traveled Analysis and Mitigation

Based on the analysis results, the residential portion of the development will generate a VMT that exceeds Imperial County's and an 11% reduction in VMT per capita is needed to mitigate the impact. The current site plan proposes 408 dwelling units on 29 acres which meets the higher density threshold. When applied, the mitigation measure reduces the VMT by 12%. This reduction places the development VMT more than 15% below the County's level (10.67) and results in the development having a less-than significant VMT impact. The retail component of the development will generate a VMT less than the value for Imperial County, so no mitigation is required.

### Site Access and Circulation

An evaluation of the site driveways indicates that all the proposed driveways will operate well based on the available capacity of the adjacent roadway.

### Conclusions and Recommendations

Based on our review of the updated TIS memorandum, we offer the following comments:

- The methodology, analyses, and results reported are consistent with the local/CEQA guidance.
- We concur with the recommendation to install a traffic signal at the following intersections as mitigation for poor operations under stop control conditions.
  - S. Brawley Avenue & Future Road (Study Intersection #9)
  - Project Driveway #1 & Future Legion Road (Study Intersection #6)
- The VMT Analysis indicates that an 11% reduction in VMT/capita is needed to mitigate the residential component of the development's impact. The recommended mitigation measure for the project found in the California Air Pollution Control Officers Association (CAPCOA) Report is T-1 (Increase Residential Density). The current site plan proposes 408 dwelling units on 29 acres which meets the higher density threshold. When applied, the mitigation measure reduces VMT by 12%.
- Based on the analyses and mitigation outlined in the updated TIS memorandum, the development is expected to have a minor impact on the surrounding transportation network. In addition, the development is presumed to have a less than significant CEQA related transportation impact.