

DRAFT

Initial Study & Environmental Analysis

for

Annexation No. 1-24 – Rio Vista Apartments

Zone Change/General Plan Amendment #26-03

Adjustment Plat #26-01 and Site Plan #26-02



City of Brawley

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

July 2026



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

July 2026

- 1. Project Title:** Annexation No. 1-24 – Rio Vista Apartments
Zone Change #26-03
General Plan Amendment #26-03
Lot Merger #26-01
Site Plan #26-02
- 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
- 4. Property Owner:** Greenview Renewables, LLC (ZGlobal, Inc.)
- 5. Project Representative:** Joe DeHoyos
- 6. Legal Description:** Parcel 2 of Parcel Map No. M-952 being a Portion of Tract 69 T.13 S. R. 14 E. S.B.B. & M. County of Imperial, State of California.
APNs: 046-050-016 (to be annexed), -028 & -030

Parcel A of BPM 78-2 in Book 4, Page 92 of Parcel Maps, being a Portion of Tract 69 T.13 S. R. 14 E. S.B.B. & M. County of Imperial, State of California.
APNs: 046-050-038 & -039
- 7. Project Location:** NW corner of Rio Vista & River Drive, also identified as “4603 Rio Vista Road”; with four portions within the City of Brawley and the County portion to be annexed being within the Brawley Sphere of Influence.
- 8. Project Description:** The Rio Vista Apartments project proposes the redevelopment of a former equestrian facility and vacant parcels of land into a 133-unit multi-family residential complex through the annexation of a 4.26-acre triangular parcel lying within unincorporated Imperial County into the City of Brawley (Annexation No. 1-24), the rezoning of this parcel and adjacent parcels of land from R-E (Residential Estates) and R (Recreational) to R-3 (Residential Medium Density) (ZC26-03), and the amending of the General Plan to redesignate the site from Rural Residential (RR) and Open Space (OS) to Medium Density Residential (MR) (GPA26-03). All five parcels making up the approximately 7.87-

acre site are planned to be consolidated into a single parcel through an Adjustment Plat (i.e., Lot Merger) (AP26-01). The project will also include a sewer lift station.

Per Article XVI of the City Zoning Ordinance, the Planning Commission must review the findings of the petition for zone change for consistency with the adopted regulations and make recommendations to the City Council for approval, conditional approval, or disapproval of Annexation No. 1-24; Zone Change #26-03; General Plan Amendment #26-03; and the Mitigated Negative Declaration.

9. General Plan Land Use Designation:

Existing City General Plan: Rural Residential (RR); Open Space (OS)

Proposed City General Plan: Medium Density Residential (MR)

10. City Zoning:

Proposed Annexed Territory: R-E (Residential Estates)

Existing City Zoning: R-E (Residential Estates)
R (Recreational)

Proposed City Zoning: R-3 (Residential Medium Density)

11. Surrounding Land:

North

R (Recreation);

New River open space

South

R-1 (Residential Single Family);

Single-Family Home /
Vacant

R-E (Residential Estates);

Vacant / Equestrian

Transportation;

River Drive

East	R-1 (Residential Single Family);	Single-Family Homes
	R-E (Residential Estates);	Estate Home
	Transportation;	Rio Vista Avenue
West	R (Recreation);	Pat Williams Park

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?

Native American tribes traditionally and/or culturally affiliated with the project area were given a window between February 20, 2026 and March 25, 2026 to request consultation. The Historic Preservation Office of the Ft. Yuma Quechan Tribe informed the City on March 11, 2026 that it did not wish to comment on the project. Based on the project site's cultural significance or ties to the Viejas Band of Kumeyaay Indians, Viejas requested on March 18, 2026 that a Kumeyaay Cultural Monitor be on site for ground disturbing activities in the event that inadvertent discovery of cultural artifacts, cremation sites, or human remains occurs. Since no other tribe contacted via mail and electronic communication requested consultation or cultural monitoring, Viejas' request will not be deferred to another tribe.

Vicinity Map/Project Location

APNs: 046-050-016, -028, -030, -038 & -039



EXHIBIT A PROJECT VICINITY MAP

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 Rio Vista Apartments project 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, which consisted of air quality, biological resources, cultural resources, greenhouse gases, noise, and transportation studies.

PROJECT DESCRIPTION:

The Rio Vista Apartments project proposes the redevelopment of a former equestrian facility and vacant pieces of land into a 133-unit multi-family residential complex through the annexation of a 4.26-acre triangular parcel lying within unincorporated Imperial County into the City of Brawley (Annexation No. 1-24). This parcel of land lies within the Brawley Sphere of Influence and is functionally a County pene-enclave, being connected to the rest of unincorporated Imperial County by an approximately 160-foot gap in the City boundary. The annexation would also incorporate a portion of River Drive and an approximately 45-square-foot portion of Parcel "A" of PM No. M-952, not owned by the project developer or property owner, into the City of Brawley.

The project will rezone the annexed parcel and four other parcels of land from R-E (Residential Estates) and R (Recreational) to R-3 (Residential Medium Density) through Zone Change #26-03. The General Plan will be concurrently amended to redesignate the site from Rural Residential (RR) and Open Space (OS) to Medium Density Residential (MR) through General Plan Amendment #26-03. All five parcels making up the approximately 7.87-acre site are planned to be consolidated into a single parcel through Adjustment Plat #26-01 in order to simplify setback considerations; the lot merger/plat adjustment is not part of the discretionary action.

The project includes:

- Five apartment buildings (36 one-bedroom units; 97 two-bedroom units)
- A clubhouse and pool facility
- Approximately 278 surface parking spaces
- Internal private drive aisles and circulation
- Stormwater retention facilities
- A sewer lift station
- Frontage improvements along River Drive (half-width)
- Dedication of 30 feet of right-of-way along Rio Vista Avenue and associated half-width improvements
- Coordination with Imperial Irrigation District (IID) regarding existing utility infrastructure
- A 26-foot multipurpose trail along the western boundary adjacent to Pat Williams Park, also serving as emergency fire access

The parcel to be annexed is designated “Urban Area” by Imperial County, while the City of Brawley Zoning Map has pre-zoned this parcel as R-E in the event of annexation. Annexation of the site would allow the City to apply R-3 zoning consistent with the proposed density.

Primary access to the project site would be provided from River Drive along the southern boundary. Secondary access would be provided via Rio Vista Avenue along the eastern boundary. Fire access would be provided to the north via the aforementioned 26-foot multipurpose trail along the boundary with Pat Williams Park.

ENVIRONMENTAL SETTING:

The project site is partially located within City limits and is designated as an “Urban Area” by Imperial County. The portion outside of City limits is within the Brawley Sphere of Influence and is planned for urban growth. Under the City of Brawley General Plan, four parcels are designated as Rural Residential, while the northernmost parcel is designated as Open Space. Surrounding land uses include open space and recreation to the north and west, single-family residences to the east, and vacant land to the south. River Drive and Rio Vista Avenue form the southern and eastern boundaries of the project site, respectively. The site is relatively flat and contains no natural topographic features. It is located at a lower elevation than residential subdivisions to the south and east and at a slightly higher elevation than Pat Williams Park to the west.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below may be affected by this project, with at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

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

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- 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.

I. AESTHETICS <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) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized area: substantially degrade the existing visual character or quality of public views of the site and its surroundings? In an urbanized area: conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

I. AESTHETICS IMPACT DISCUSSION

The project is in the northwestern area of the City of Brawley and is not located within the vicinity of a State Scenic Highway. The site does not contain scenic vistas, rock outcroppings, or historical visual resources.

The project would convert underutilized land to multi-family residential use. The project site is adjacent to a residential area located at Rio Vista and River Drive. The existing visual character and quality can be characterized as moderately developed, with single-family residential and rural residential land uses. The development would not conflict with the existing character or quality of the surroundings. Furthermore, it would comply with City development standards governing building design, height, setbacks, and landscaping to maintain cohesiveness with surrounding residential uses.

The project would not create substantial light or glare beyond typical residential uses such as pedestrian areas and for vehicle parking areas, following the requirements of the Zoning Ordinance. Therefore, impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES. <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) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☒	☐
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☒	☐

II. AGRICULTURE AND FORESTRY RESOURCES DISCUSSION

Per the map *Imperial County Important Farmland 2022* recorded by the CA Department of Conservation, the area to be annexed and most incorporated portions of the site are classified as “Urban and Built-Up Land”, with a small portion towards the southwest classified as “Other Land”. A small portion of the site to the north is classified as “Farmland of Local Importance”, and in accordance with this designation, this portion is not actively being irrigated or cultivated. Overall, the project would not result in the conversion of agricultural land to urban uses.

The parcel outside of City limits is zoned A-2-U (General Agriculture within Urban Area) by Imperial County, but it is also designated Urban Area and is within the City Sphere of Influence. The site is not under a Williamson Act contract and does not contain forest land, timberland, or designated mineral resources. Conversion to residential use is consistent with planned urban expansion, and it would not result in a significant impact to agricultural resources. Impacts would therefore be less than significant.

III. AIR QUALITY. <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. 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) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
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)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☒	☐	☐

III. AIR QUALITY DISCUSSION

The project involves the development of 133 multi-family residential units with a clubhouse, swimming facility, parking areas and associated open space areas. The final Air Quality Assessment was prepared by RECON. A substantial portion of the project site has a land use designation of Rural Residential (RR) and proposes the re-designation of land use to Medium Density Residential (MR), resulting in an increase of 117 units. Preliminary analysis indicates that emissions, diesel particulate matter (DPM), and carbon monoxide (CO) hot spots would remain within applicable thresholds, and the project would comply with Imperial County Air Pollution Control District (ICAPCD) requirements. The project would not conflict with the five (5) applicable ICAPCD air quality plans identified in the study. Construction activities would generate temporary emissions of criteria air pollutants and fugitive dust at less than significant levels. The project will include a sewer lift station, a potential odor source.

Mitigation Measures:

MM-AQ-1

Fugitive Dust Control:

Implement all ICAPCD-required dust control measures during construction.

MM-AQ-2

Construction Equipment Emissions:

Limit construction equipment idling; ensure proper maintenance of equipment consistent with ICAPCD and CARB standards, and in accordance with manufacturer standards; and utilize best available control technologies where feasible.

MM-AQ-3

Sewer Odors:

The design of the sewer lift station shall include all necessary odor control systems. Documentation of proper odor control measures shall be submitted to the City prior to the issuance of building permits for the sewer lift station.

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

IV. BIOLOGICAL RESOURCES. <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?	☐	☒	☐	☐
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?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or 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?	☐	☐	☒	☐

IV. BIOLOGICAL RESOURCES. <i>Would the Project:</i> (continued)	PSI	PSUMI	LTSI	NI
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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☒	☐

IV. BIOLOGICAL RESOURCES DISCUSSION

A Biological Resources Survey and Burrowing Owl Habitat Assessment conducted by RECON identified disturbed habitat with low potential for special-status species. One potentially suitable burrowing owl burrow was identified in the survey area buffer. No sensitive natural communities or jurisdictional wetlands were identified within the development footprint. RECON's Survey and Assessment were conducted under the assumption that the project site would be developed with 144 units, rather than the current proposal of 133 units.

Mitigation Measures:

MM-BIO-1

Burrowing Owl Surveys:

Conduct pre-construction burrowing owl surveys; and implement avoidance buffers or passive relocation, if necessary; consistent with CDFW guidelines.

MM-BIO-2

Nesting Birds:

If grading occurs during nesting season, conduct pre-construction nesting bird surveys during breeding season and implement appropriate buffers.

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

V. CULTURAL RESOURCES. <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) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

V. CULTURAL RESOURCES DISCUSSION

An Archaeological Resources Survey and records search conducted by RECON identified no recorded archaeological resources within the project footprint. Tribal consultation notices were sent pursuant to AB 52. No historical or archaeological resources were identified on-site. However, the project's location near the New River and its alluvial floodplain increases the potential for buried archaeological resources. RECON's Survey was conducted under the assumption that the project site would be developed with 144 units, rather than the current proposal of 133 units.

Mitigation Measures:

MM-CUL-1

Archaeological Monitoring

An archaeologist shall be present on-site to monitor construction activities in the event that buried archaeological resources are unearthed.

MM-CUL-2

Inadvertent Discovery:

If cultural resources are discovered during ground disturbance or construction, work shall cease within 100 feet of the discovery, and a qualified archaeologist shall evaluate the find in accordance with CEQA and State requirements.

MM-CUL-3

Human Remains Notification:

If human remains are discovered, the developer shall comply with Health & Safety Code §7050.5 and notify the County Coroner.

With mitigation, impacts to cultural resources would be less than significant.

VI. ENERGY <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 potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

VI. ENERGY

The project would result in the use of electricity and consumption of energy resources during both construction and use of the residential units. The consumption is not expected to be wasteful or inefficient. The project would be designed according to and comply with Title 24 and CALGreen requirements. Project energy features would therefore have a less than significant impact.

VII. GEOLOGY AND SOILS. <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☒	☐
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☒	☐
ii. Strong Seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

VII. GEOLOGY AND SOILS. <i>Would the Project:</i> (continued)	PSI	PSUMI	LTSI	NI
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?	☐	☒	☐	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

VII. GEOLOGY AND SOILS DISCUSSION

A geotechnical report will be prepared prior to any issuance of building permits. The design will address any geological issues that may compromise the development. Preliminary analysis indicates that the project is not located within an Alquist-Priolo Fault Zone. The site is relatively flat and is located below the elevation of residential neighborhoods to the south and east. For structural integrity of all buildings and structures, the project must conform to seismic requirements as outlined in the California Building Code, thereby minimizing potential significant adverse effects or exposure to people.

Mitigation Measures:

MM-GEO-1

Pre-Grading Recommendations:

Implement recommendations of the final geotechnical report prior to grading permit issuance.

With mitigation, geological and soils-related impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS. <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) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

VIII. GREENHOUSE GAS EMISSIONS DISCUSSION

A Greenhouse Gas (GHG) Analysis was prepared by RECON. The project would generate GHG emissions from construction and operational vehicle trips at less than significant levels. The project would comply with Title 24 and CALGreen requirements and is consistent with regional growth projections. Preliminary results from a LLG's peer-reviewed Vehicle Miles Traveled (VMT) Assessment indicate the project would not result in significant VMT impacts under SB 743. GHG impacts would therefore be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS. <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) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☐	☒

IX. HAZARDS AND HAZARDOUS MATERIALS. <i>Would the Project:</i> (continued)	PSI	PSUMI	LTSI	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 result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
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?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

IX. HAZARDS AND HAZARDOUS MATERIALS DISCUSSION

The project is not expected to create a significant hazard to the public or the environment, as it does not involve the transport, use, or disposal of hazardous materials. Furthermore, the site is not identified in any regulatory hazardous materials databases. Standard construction practices would minimize risks. The project would not impair emergency access. Overall impacts from hazards and hazardous materials are less than significant.

X. HYDROLOGY AND WATER QUALITY. <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) 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)?	☐	☐	☐	☒

X. HYDROLOGY AND WATER QUALITY. (continued) <i>Would the Project:</i>	PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
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?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
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?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

X. HYDROLOGY AND WATER QUALITY DISCUSSION

The project involves the development of 133 multi-family residential units across five (5) buildings on a 7.87-acre site. Development projects of this nature have the potential to generate pollutants during both construction and post-construction phases. The development of the project site would increase impervious surface area. However, the implementation of stormwater retention basins and compliance with a Storm Water Pollution Prevention Plan (SWPPP) would effectively reduce runoff and mitigate water quality impacts.

The project site is not located within a FEMA-designated flood zone. The nearest Zone A flood area is located more than 1,000 feet from the project site. Furthermore, existing residential development to the north of the project site is located closer to Zone A than the proposed development. Therefore, the project would not have impact related to flood zones.

Mitigation Measures:**MM-HYD-1**

Stormwater Management:

Prepare and implement a SWPPP prior to grading.

MM-HYD-2

Construction Controls/BMPs:

Implement erosion and sediment control Best Management Practices (BMPs) during grading.

With mitigation, impacts would be less than significant.

XI. LAND USE/PLANNING. <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) 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?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

XI. LAND USE PLANNING DISCUSSION

The project requires annexation from the County of Imperial to the City of Brawley, a General Plan Amendment, and a Zone Change, to ensure consistency with City land use designations. The General Plan Amendment would change the designations from Rural Residential (RR) and Open Space (OS) to Medium Density Residential (MR). The Zone Change is required to be consistent with the General Plan and would change from Residential Estates (R-E) and Recreation (R) to Residential Medium Density (R-3). Upon approval, the project would be consistent with the General Plan and Zoning Ordinance. The project would not physically divide an established community. Land use impacts would be less than significant.

XII. MINERAL RESOURCES. <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) 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?	☐	☐	☐	☒

XII. MINERAL RESOURCES DISCUSSION

There are no known mineral resources in the project area.

XIII. NOISE. <i>Would the Project:</i>	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) 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) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	☐	☒	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐

XIII. NOISE. (continued) <i>Would the Project:</i>	PSI	PSUMI	LTSI	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?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

XIII. NOISE DISCUSSION

The project consists of multi-family residential units that will serve as permanent housing for residents. A sewer lift station will also be constructed. A comprehensive Noise Analysis was prepared by RECON. Preliminary analysis indicates that the project would generate noise levels consistent with typical multi-family residential developments and will remain within the permissible limits established by the City of Brawley General Plan, the City of Brawley Noise Ordinance, General Noise regulations, the California Building Noise Standard, and other relevant standards. Construction-related noise impacts would be temporary in nature and regulated by City standards. Primary on-site noise sources would be HVAC equipment and the sewer lift station. The sewer lift station's exact design and equipment requirements are not known at this time. Station fans and generators may produce significant noise, so mitigation shall be required to ensure that the actual design of the station is consistent with the conclusions of the Noise Analysis.

Mitigation Measures:

MM-NOI-1

Sewer Lift Station Analysis:

Prior to the issuance of building permits for the sewer lift station, if any above-ground noise-generating equipment such as an emergency generator or blower fans is required, a noise analysis shall be prepared demonstrating the operational noise levels would not exceed the applicable noise limits specified in Section 18.4 of the Municipal Code. The analysis shall identify noise barriers and equipment enclosures if necessary to achieve the applicable noise level limits.

MM-NOI-2

Construction Hours:

Limit all construction activities to hours permitted by the Brawley Municipal Code.

MM-NOI-3

Equipment Noise Control:

Maintain equipment and use properly functioning mufflers.

With mitigation, noise impacts would be less than significant.

XIV. POPULATION AND HOUSING. <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) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

XIV. POPULATION AND HOUSING DISCUSSION

Impacts on population are less than significant and are generally in line with local growth expectations. No housing exists on-site at present, and no housing in the project vicinity would be displaced. The project would provide 133 new housing units consistent with planned urban growth. Impacts would be less than significant.

XV. PUBLIC SERVICES. <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:	☐	☐	☒	☐
1) Fire Protection?	☐	☐	☒	☐
2) Police Protection?	☐	☐	☒	☐
3) Schools?	☐	☐	☒	☐
4) Parks?	☐	☐	☒	☐
5) Other Public Facilities?	☐	☐	☒	☐

XV. PUBLIC SERVICES DISCUSSION

The project would incrementally increase demand for fire, police, and parks services. Development impact fees and conditions of approval would ensure service levels are maintained. Overall impact on public services would be less than significant.

XVI. RECREATION. <i>Would the Project:</i>	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) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	☐	☐	☒	☐

XVI. RECREATION DISCUSSION

The project includes on-site recreational amenities and is adjacent to Pat Williams Park. Impacts to recreational facilities would be minimal and less than significant.

XVII. TRANSPORTATION AND TRAFFIC. <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) 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
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?	☐	☐	☒	☐

XVII. TRANSPORTATION AND TRAFFIC DISCUSSION

A Local Mobility Analysis (LMA) and VMT Assessment were prepared by LLG and peer reviewed by NV5. Preliminary results indicate the project would not result in significant VMT impacts under SB 743. Required frontage improvements are addressed in the project's conditions of approval.

*Mitigation Measures:***MM-TRAF-1**

Frontage Improvements:

Implement required frontage, access, and roadway improvements along River Drive and Rio Vista Avenue; and ensure emergency access compliance.

Transportation impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

In accordance with AB 52, mail and electronic communications were initiated with tribes culturally affiliated with the project site, with tribes given the opportunity to request formal consultation between February 20, 2026 and March 26, 2026. Should any tribal cultural resources be identified during prior to or during the construction process, the City will work collaboratively with consulting tribes to develop and implement culturally appropriate preservation and mitigation strategies. The Viejas Band of Kumeyaay Indians was the only affiliated tribe to respond with a request for formal consultation, identifying the project site as culturally significant or tied to Viejas. Viejas requested that a Kumeyaay Cultural Monitor be on site in the event of inadvertent discovery of culturally significant artifacts, sites, or remains.

*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

Kumeyaay Cultural Monitor

A Kumeyaay Cultural Monitor shall be on site for ground disturbing activities and shall inform the Viejas Band of Kumeyaay Indians of new developments, such as the inadvertent discovery of cultural artifacts, cremation sites, or human remains.

With mitigation, impacts on tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS Would the Project:	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) 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

XIX. UTILITIES AND SERVICE SYSTEMS DISCUSSION

The project would connect to City water and wastewater systems following annexation. Required infrastructure improvements are included in the project's conditions of approval. Impacts would be less than significant.

XX. WILDFIRE

The project is located in an urban area and is not located in any known Fire Hazard Severity Zone. Therefore, the City has determined that there will be no impact.

SECTION 3 - III. MANDATORY FINDINGS OF SIGNIFICANCE

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

XXI. 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) 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)?	☐	☐	☐	☒
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

XXI. MANDATORY FINDINGS OF SIGNIFICANCE DISCUSSION

None.

XXII. 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.

IV. PERSONS AND ORGANIZATIONS CONSULTED

Brawley Public Works Department

Brawley Fire Department

V. REFERENCES

2025 California Fire Code

2019 General Plan CAP Negative Declaration

2008 General Plan Final MND

1994 General Plan Final EIR