

PLANNING COMMISSION

Julitza Alvarez

Jay Goyal

George A. Marquez

Daniel Nunez

Robert Palacio

Cynthia Vandiver

Sean Wilcock



AGENDA

**PLANNING COMMISSION
REGULAR MEETING
WEDNESDAY, APRIL 1, 2026 AT 5:30 P.M.
CITY COUNCIL CHAMBERS
383 MAIN STREET
BRAWLEY, CALIFORNIA**

1. CALL TO ORDER / ROLL CALL
2. APPROVE AGENDA
3. APPROVE MINUTES

4. PUBLIC APPEARANCES

The Planning Commission encourages citizen participation on all matters presented for their consideration. Members of the public who wish to speak on an issue that is not on the agenda may do so during the "Public Appearances" section at any meeting. The Planning Commission does not take action on items presented under Public Appearances.

5. **Draft 2026 Service Area Plan (SAP) Update**

State law requires that all incorporated cities and special districts within the State of California prepare SAPs identifying the existing and projected demand for public facilities and services. These updates are to occur at least every five (5) years. The current Service Area Plan (SAP) for the City of Brawley was adopted in 2018 to cover a twenty-year (20-yr) period between 2010 and 2030. A draft for the 2026 SAP was prepared by RICK Engineering to address the City's ability to provide necessary services to areas within city limits and the Brawley Sphere of Influence. This update accounts for upcoming annexations and outlines how Brawley's existing and project needs can be adequately funded and phased.

This is only an informational item for the Planning Commission before it moves onto City Council for approval.

PUBLIC HEARING

6. DT 26-01 / ZC 26-04 / SPA 26-03 – Downtown Specific Plan Amendment

The City of Brawley seeks to amend its Downtown Specific Plan under Downtown Project (DT) #26-01, Zone Change (ZC) #26-04, and Specific Plan Amendment (SPA) #26-03). The proposed amendment would modify allowed land uses within the Downtown Specific Plan Area to be less restrictive towards certain kinds of commercial development. The Specific Plan Area’s West Village district will also be extended east by approximately one block from its current eastern boundary at 3rd Street.

The Planning Commission must review City staff’s findings and make recommendations to staff and the City Council.

Property Owner(s): *Various*
Applicant(s): City of Brawley
Location: Downtown Specific Plan Area

Properties Affected

By ZC: 300 blocks of “E” Street and “G” Street
 301, 310, and 351 Main Street
 115-135 S. Plaza Street

 (APNs: 046-213-012 thru -016; 046-213-004 thru -006;
 046-214-010 thru -012; 048-062-002 thru -009; and
 048-111-001 thru -004, -009, -010, and -035)

By SPA: All properties in the Specific Plan Area

7. ZOR 26-01 – Caretaker’s Residence Amendment

Zoning Ordinance Amendment (ZOR) #26-01 proposes to allow caretaker’s residences as accessory uses by right in C-3 (Heavy Commercial) and M-1 (Light Manufacturing) zones. The Planning Commission must review City staff’s findings and the draft text of the amendment. Following review, the Planning Commission must make recommendations to staff and the City Council.

Property Owner(s): N/A
Applicant(s): City of Brawley
Location: N/A
Properties Affected: All properties zoned C-3 or M-1

8. ZOR 26-02 – Water Stores Amendment

Zoning Ordinance Amendment (ZOR) #26-02 proposes to permit water stores by right in all commercial zones (i.e., zones C-P, C-1, C-2, and C-3). The Planning Commission must review City staff's findings and the draft text of the amendment. Following review, the Planning Commission must make recommendations to staff and the City Council.

Property Owner(s): N/A

Applicant(s): City of Brawley

Location: N/A

Properties Affected: All properties zoned C-P, C-1, C-2, and C-3

9. NEXT MEETING DATE

To be determined.

10. ADJOURNMENT

PLANNING COMMISSION STAFF REPORT

Project: 2026 Service Area Plan (SAP) Update Draft

Applicant(s): City of Brawley

Location: Citywide and Sphere of Influence

**PLANNING COMMISSION INFORMATIONAL ITEM
APRIL 1, 2026, 5:30 P.M.
CITY COUNCIL CHAMBERS
383 MAIN STREET, BRAWLEY, CALIFORNIA 92227**

Informational Item: Draft Service Area Plan (SAP) Update

Background:

State law requires that all incorporated cities and special districts within the State of California prepare SAPs identifying the existing and projected demand for public facilities and services. These updates are to occur at least every five (5) years. The current Service Area Plan (SAP) for the City of Brawley was adopted in 2018 to cover a twenty-year (20-yr) period between 2010 and 2030. Brawley continues to grow within areas such as Rancho Porter, Luckey Ranch, and the residential neighborhoods adjacent to Wildcat Drive. Additionally, the upcoming annexations of the Rio Vista Apartments and Rancho Los Lagos sites will greatly expand the city's area, increasing demands for adequate transportation facilities, water, and other necessary services, including those pertaining to public safety. The 2026 SAP intends to address these demands between 2025 and 2045.

General Information:

A draft for the 2026 SAP was prepared by RICK Engineering to address the City's ability to provide necessary services to areas within city limits and the Brawley Sphere of Influence. This plan outlines Brawley's existing facilities and evaluates their adequacy in meeting current and future needs. The draft accounts for the Rio Vista Apartments and Rancho Los Lagos annexations as significant sources of growth for both population and demand for services. Data provided in the draft is based on the 2020 Census. Assuming an existing population of 35,000 people, Brawley is projected to have a population of 47,022 in 2045. The development of Rancho Los Lagos, the Rio Vista Apartments, and the Brawley Gateway Mixed-Use Master Plan Area is projected to increase the population to 58,758.

The draft SAP outlines how the existing and projected needs of Brawley can be adequately funded and phased. Future sources of funding are also listed in the plan. Various recommendations for implementing adequate services are included in each section.

Informational Item: Draft Service Area Plan (SAP) Update

Department/Public Agency Comments:

Building Department:

N/A

Public Works:

Engineering has reviewed the Draft SAP.

Fire Department Notes:

Fire has reviewed the Draft SAP.

Planning Department:

Planning has reviewed the Draft SAP.

ATTACHMENTS: Draft SAP, Notice of Exemption

NOTE: Electronic copy of the 2026 Draft SAP Available in the Packet Addendum

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk

County of: _____

From: (Public Agency): _____

(Address)

Project Title: _____

Project Applicant: _____

Project Location - Specific:

Project Location - City: _____ Project Location - County: _____

Description of Nature, Purpose and Beneficiaries of Project:

Name of Public Agency Approving Project: _____

Name of Person or Agency Carrying Out Project: _____

Exempt Status: **(check one):**

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: _____
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

Lead Agency

Contact Person: _____ Area Code/Telephone/Extension: _____

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: _____ Title: _____

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

PLANNING COMMISSION STAFF REPORT

Project: Downtown Project #26-01 / Zone Change #26-04 / Specific Plan Amendment #26-03– Amendments to the Downtown Specific Plan Map and Land Use Tables (*Downtown Project, Zone Change, Specific Plan Amendment*)

Applicant(s): City of Brawley

Location: Downtown Specific Plan Area

Zoning: P-D (Planned Development)

General Plan Designation: Downtown West Village, Downtown Civic Center, Downtown East Village

**PLANNING COMMISSION PUBLIC HEARING
APRIL 1, 2026, 5:30 P.M.
CITY COUNCIL CHAMBERS
383 MAIN STREET, BRAWLEY, CALIFORNIA 92227**

Specific Plan Amendment / Zone Change: DT26-01 / ZC26-04 / SPA 26-03
Downtown Specific Plan Amendment

Background:

The City of Brawley's Downtown Specific Plan was implemented in December 2012, putting forth a vision of urban development in Brawley's Downtown core that focused on dense, multi-story mixed residential and commercial developments. This vision was shaped by stakeholder interviews in 2009 and 2010, two community workshops, a walking tour, a joint study session, and numerous comment cards from residents. The community's vision statement and the regulations for implementing said vision emphasized mixed-use and walkable design through the integration of commercial and residential uses in the same area. The development of vacant lots with new mixed-use buildings was also envisioned by the community between 2009 and 2012.

However, after more than a decade, it has become apparent that the list of uses permitted in each zone has become an obstacle to companies and business owners wishing to develop within the Downtown Specific Plan area. Many of the vacant lots recorded in before 2012 still remain vacant today, and commercial opportunities that are expected to be allowed by right in a downtown area require approval by either the Planning Director or Planning Commission. Therefore, the Planning Division has prepared an amendment to the Downtown Specific Plan that updates the boundaries of certain zones and relaxes existing regulations on certain land uses.

General Information:

The proposed 2026 Amendment to the 2012 Downtown Specific Plan updates the list of permitted, conditional, and prohibited uses for each zone in the Specific Plan area. These changes move certain uses to less restrictive use categories (e.g., Director's CUP to Permitted by Right). Uses not addressed in the original Specific Plan document have also been added to the tables, while vaguely-worded land uses have been given more descriptive names. The "Permitted by Location" category has been expanded to all zones in the Downtown Specific Plan area to address special cases and encourage modest development within lower-intensity zones without interrupting the "small town feel" envisioned in the original Specific Plan. North-south streets (e.g., 2nd Street, 3rd Street, etc.) have been promoted as sites for low-intensity commercial activity besides offices within neighborhood areas, promoting the original walkable vision without compromising the character of residential areas within Downtown. The allowance of retail and dining in the Civic Center Neighborhood zone reflects the reality that there are already established retail and dining locations within said zone.

The new category of "Preferred Use" has been created as a sub-type of "Permitted by Right" uses, describing uses that are especially desirable and more closely align with broader public goals and the specific community visions identified in past planning exercises. The "Preferred Use" category promotes the original development vision for each Downtown Specific Plan zone by providing reduced fees, streamlined reviews, and technical assistance to business and property owners in Downtown who intend to develop certain land uses that fall within said category. City staff would evaluate these project proposals based on objective standards to determine whether the proposal would fall under the "Preferred Use" category.

Lastly, this proposed amendment to the Downtown Specific Plan includes a zone change that extends the West Village zones east to replace existing Civic Center zones to reflect the reality of existing developments west of Plaza Park. Through this, vacant sites between 3rd Street and Imperial Avenue may have a better chance at being developed with desirable businesses.

Specific Plan Amendment / Zone Change: DT26-01 / ZC26-04 / SPA 26-03
Downtown Specific Plan Amendment

Environmental Information:

The proposed project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301 (Class 1 – Existing Facilities).

The project consists of approval of an amendment to the Downtown Specific Plan that would relax land use regulations in certain zones and change the zones of certain parcels in the Downtown Specific Plan area. The proposed amendment could influence the development of vacant lots and storefronts but would not directly impact said sites.

The project does not involve any directly alteration or addition to existing facilities in the Downtown Specific Plan area and does not directly expand the operational capacity, intensity, or footprint of any existing land use. Changes in customer traffic and hours of operation for any individual business or residence in the Specific Plan area are to be accounted for on a case-by-case basis, with each site to be evaluated at the appropriate time (i.e., when Building or Planning applications are submitted). The project would not directly increase customer traffic or expand hours of operation for any specific spot.

No expansion of use beyond that which was previously approved is proposed, and the project would not result in significant environmental effects related to traffic, noise, air quality, public services, utilities, or other environmental resources.

Furthermore, none of the exceptions to the use of a categorical exemption set forth in CEQA Guidelines Section 15300.2 apply to the project. The project site is not located within a sensitive environmental area, does not involve unusual circumstances, does not result in cumulative impacts, and would not cause a substantial adverse change in the significance of a historical resource."

Therefore, the project qualifies for a Class 1 Categorical Exemption, and a Notice of Exemption (NOE) will be filed following project approval.

Staff Recommendation:

Based on the information provided, City staff recommends **approval** of the proposed Downtown Specific Plan Amendment and its associated zone changes.

The recommendation is based on the following findings:

1. The proposal is exempt from CEQA pursuant to Section 15301.
2. The location of the project and surrounding land uses make it unlikely the project will cause significant environmental impacts. There will be minor alterations to the existing structure.
3. Approval of the proposed Specific Plan Amendment and Zone Change would not be detrimental to the public welfare or detrimental to the health and safety of the residents of the City of Brawley.
4. The proposed Specific Plan Amendment and Zone Change is consistent with the General Plan, zoning, and the character of the area.

Specific Plan Amendment / Zone Change: DT26-01 / ZC26-04 / SPA 26-03
Downtown Specific Plan Amendment

The Brawley General Land Use Map designates this area as the **West Village, Civic Center, and East Village** land use districts of the Downtown Specific Plan area. City staff do not find the zone changes to be inconsistent with the existing General Plan designations, nor do they find the implementation of these zone changes to detract from the most recently amended version of the Brawley General Plan.

Department/Public Agency Comments:

Building Department:

N/A

Public Works:

N/A

Fire Department Notes:

N/A

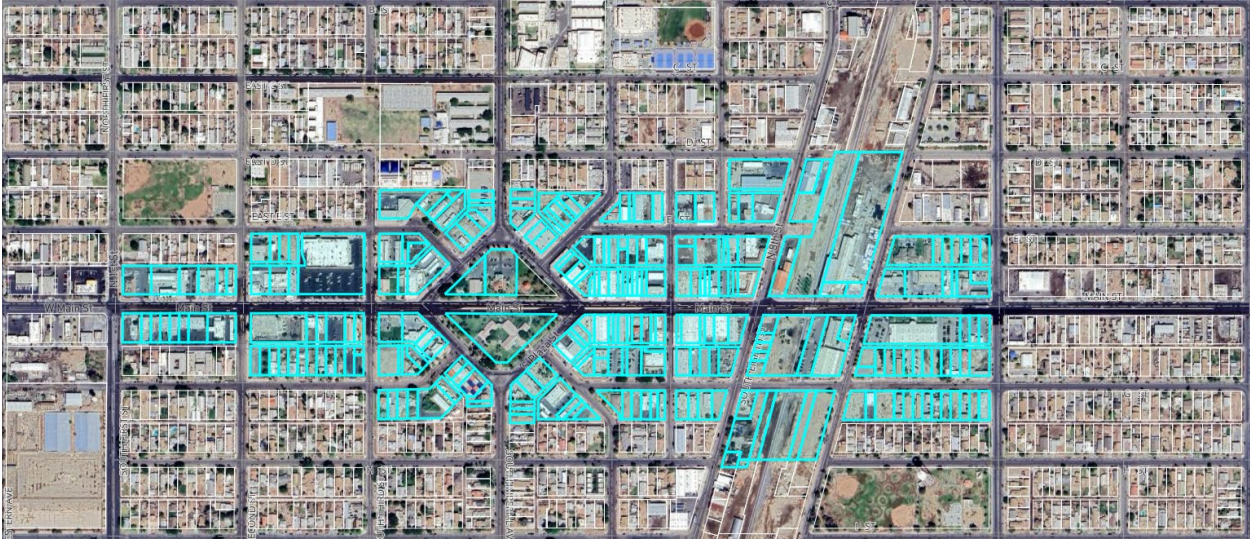
Planning Department:

Recommend approval of the proposed Specific Plan Amendment and Zone Change.

ATTACHMENTS: Vicinity Map, Zone Change Map, Amended Land Use Tables, Preferred Use Fact Sheet, NOE, Notice of Public Hearing

Specific Plan Amendment / Zone Change: DT26-01 / ZC26-04 / SPA 26-03
Downtown Specific Plan Amendment

VICINITY MAP
Downtown Specific Plan Area



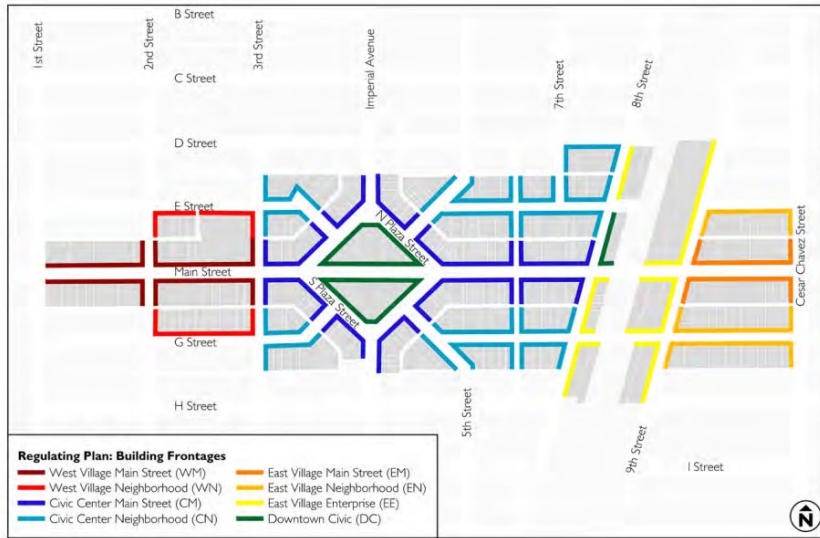
Specific Plan Amendment / Zone Change: DT26-01 / ZC26-04 / SPA 26-03
Downtown Specific Plan Amendment

ZONE CHANGE MAP
 2026 Downtown Specific Plan Amendment

ORIGINAL MAP

Regulating Code

Figure 4-1: Frontage Regulating Plan

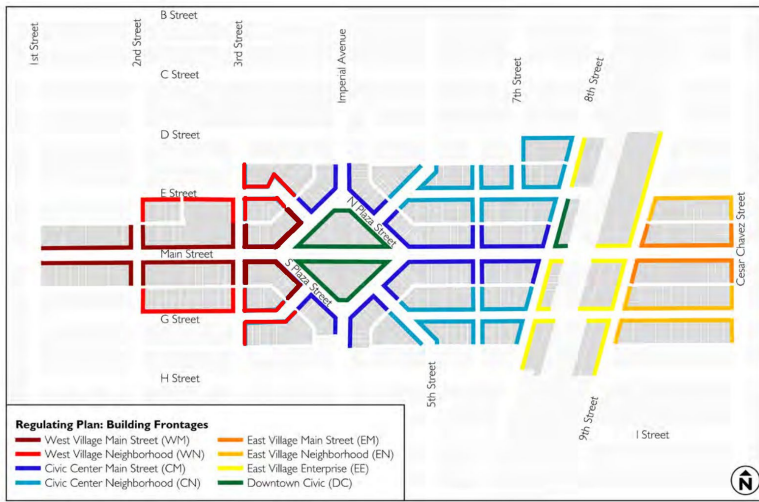


4-3

NEW MAP

Regulating Code

Figure 4-1: Frontage Regulating Plan



4-3

Civic Center Main Street

Entitlement Type	Existing Plan	Proposed Amendment
Preferred		<ul style="list-style-type: none"> • Retail sales • Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property) • Personal services • Civic services • Administrative and professional offices • Temporary outdoor sales, events, farmer’s markets, and festivals (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director
Permitted by Right	<ul style="list-style-type: none"> • Retail • Dining (including outdoor dining on private property) • Service • Professional office • Temporary outdoor sales, events, and festivals (per guidelines and parameters of City Council Resolution) 	<ul style="list-style-type: none"> • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Self-service laundries • Veterinarian services • Gyms / training centers • Water (only) stores • Dental offices • Other similar uses as determined by Planning Director
Permitted by Location	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units: residential units are only allowed on upper floors or within ground floor locations that do not have street frontage. • Lodging: sleeping rooms are only allowed on upper floors or within ground floor locations that do not have street frontage 	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units: residential units are only allowed on upper floors or within ground floor locations that do not have street frontage. • Lodging: sleeping rooms are only allowed on upper floors or within ground floor locations that do not have street frontage • Other similar uses as determined by the Planning Director
Director’s CUP	<ul style="list-style-type: none"> • Child care centers • Automobile sales/rentals (new/used) • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) 	<ul style="list-style-type: none"> • Child care centers • Automobile sales/rentals (new/used) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Medical services

	<ul style="list-style-type: none"> • Tattoo parlors • Pawn shops • Liquor/convenience stores • Self-service laundries • Medical/Veterinarian services • Sidewalk dining • Other similar uses as determined by Planning Director 	<ul style="list-style-type: none"> • Sidewalk dining • Bars and cocktail lounges • Drive-thru eating establishments • Other similar uses as determined by Planning Director
Planning Commission CUP	<ul style="list-style-type: none"> • Bars and cocktail lounges • Smoke house, cigar lounge, hookah lounge • Places of assembly • Kennels/animal hotels • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Smoke house, cigar lounge, hookah lounge • Places of assembly • Kennels/animal hotels • Other similar uses as determined by the Planning Director
Prohibited	<ul style="list-style-type: none"> • Adult businesses • Medical marijuana dispensaries • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Drive-thrus • Warehousing • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Adult businesses, stores, and entertainment establishments • Cannabis dispensaries and all related operations • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director

Civic Center Neighborhood

Entitlement Type	Existing Plan	Proposed Amendment
Preferred		<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units • Personal services • Administrative and professional offices • Other similar uses as determined by the Planning Director
Permitted by Right	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units • Service • Professional office • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Child care centers • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Self-service laundries

		<ul style="list-style-type: none"> • Veterinarian services • Water (only) stores • Dental offices • Other similar uses as determined by the Planning Director
Permitted by Location		<ul style="list-style-type: none"> • Retail sales (adjacent to north-south streets) • Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property; adjacent to north-south streets) • Gyms / training centers (adjacent to north-south streets) • Other similar uses as determined by the Planning Director
Director's CUP	<ul style="list-style-type: none"> • Retail • Dining (including outdoor dining on private property) • Lodging • Child care centers • Automobile sales/rentals (new/used) • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Self-service laundries • Medical services • Veterinarian services • Sidewalk dining • Temporary outdoor sales • Events and festivals • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Retail sales • Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property) • Lodging • Automobile sales/rentals (new/used) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Medical services • Sidewalk dining • Temporary outdoor sales • Events and festivals • Gyms / training centers • Other similar uses as determined by the Planning Director
Planning Commission CUP	<ul style="list-style-type: none"> • Smoke house, cigar lounge, hookah lounge • Places of assembly • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Smoke house, cigar lounge, hookah lounge • Places of assembly • Other similar uses as determined by the Planning Director
Prohibited	<ul style="list-style-type: none"> • Kennels/animal hotels • Drive-thrus • Bars and cocktail lounges • Adult businesses 	<ul style="list-style-type: none"> • Kennels/animal hotels • Drive-thru eating establishments • Bars and cocktail lounges

	<ul style="list-style-type: none"> • Medical marijuana dispensaries • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Adult businesses, stores, and entertainment establishments • Cannabis dispensaries and all related operations • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director
--	--	--

West Village Main Street

Entitlement Type	Existing Plan	Proposed Amendment
Preferred		<ul style="list-style-type: none"> • Retail sales • Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property) • Personal services • Administrative and professional offices • Other similar uses as determined by the Planning Director
Permitted by Right	<ul style="list-style-type: none"> • Retail • Dining (including outdoor dining on private property) • Service • Professional office • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Self-service laundries • Veterinarian services • Gyms / training centers • Water (only) stores • Dental offices • Other similar uses as determined by the Planning Director
Permitted by Location	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units: residential units are only allowed on upper floors or within ground floor locations that do not have street frontage 	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units: residential units are only allowed on upper floors or within ground floor locations that do not have street frontage

	<ul style="list-style-type: none"> • Lodging: sleeping rooms are only allowed on upper floors or within ground floor locations that do not have street frontage 	<ul style="list-style-type: none"> • Lodging: sleeping rooms are only allowed on upper floors or within ground floor locations that do not have street frontage • Other similar uses as determined by the Planning Director
Director's CUP	<ul style="list-style-type: none"> • Child care centers • Automobile sales/rentals (new/used) • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Self-service laundries • Medical services • Veterinarian services • Outdoor dining • Sidewalk dining • Temporary outdoor sales • Events and festivals • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Child care centers • Automobile sales/rentals (new/used) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Medical services • Outdoor dining • Sidewalk dining • Temporary outdoor sales • Events and festivals • Bars and cocktail lounges • Kennels/animal hotels • Drive-thru eating establishments • Other similar uses as determined by Planning Director
Planning Commission CUP	<ul style="list-style-type: none"> • Bars and cocktail lounges • Smoke house, cigar lounge, hookah lounge • Places of assembly • Kennels/animal hotels • Drive-thrus • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Smoke house, cigar lounge, hookah lounge • Places of assembly • Convalescent care/hospitals • Other similar uses as determined by the Planning Director
Prohibited	<ul style="list-style-type: none"> • Adult businesses • Medical marijuana dispensaries • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Adult businesses, stores, and entertainment establishments • Cannabis dispensaries and all related operations • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director

West Village Neighborhood

Entitlement Type	Existing Plan	Proposed Amendment
Preferred		<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units • Personal services • Administrative and professional offices • Temporary outdoor sales (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director
Permitted by Right	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units • Service (as permitted by Section 27.200: Home Occupations of the Zoning Ordinance) • Temporary outdoor sales (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Child care centers • Water (only) stores • Other similar uses as determined by the Planning Director
Permitted by Location		<ul style="list-style-type: none"> • Retail sales (adjacent to north-south streets) • Gyms / training centers (adjacent to north-south streets) • Other similar uses as determined by the Planning Director
Director's CUP	<ul style="list-style-type: none"> • Service • Professional office • Child care centers • Events and festivals • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Events and festivals • Retail sales • Self-service laundries • Veterinarian services • Gyms / training centers • Dental offices • Other similar uses as determined by the Planning Director
Planning Commission CUP	<ul style="list-style-type: none"> • Retail • Dining (including outdoor dining on private property) • Lodging • Self-service laundries • Medical services • Veterinarian services • Sidewalk dining 	<ul style="list-style-type: none"> • Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property) • Lodging • Medical services • Sidewalk dining • Places of assembly

	<ul style="list-style-type: none"> • Places of assembly • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Tattoo parlors • Pawn shops • Other similar uses as determined by the Planning Director
Prohibited	<ul style="list-style-type: none"> • Automobile sales/rentals (new/used) • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Smoke house, cigar lounge, hookah lounge • Kennels/animal hotels • Drive-thrus • Bars and cocktail lounges • Adult businesses • Medical marijuana dispensaries • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Automobile sales/rentals (new/used) • Liquor/convenience stores • Smoke house, cigar lounge, hookah lounge • Kennels/animal hotels • Drive-thru eating establishments • Bars and cocktail lounges • Adult businesses, stores, and entertainment establishments • Cannabis dispensaries and all related operations • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director

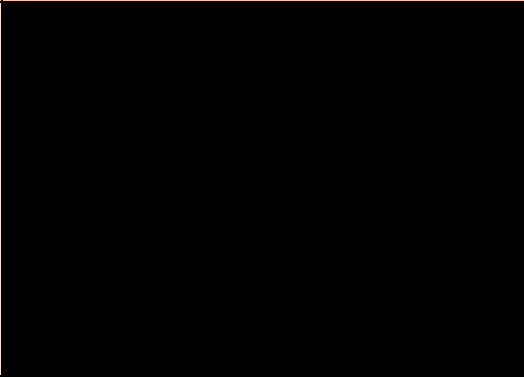
East Village Main Street

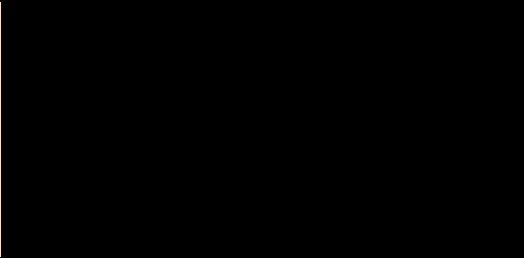
Entitlement Type	Existing Plan	Proposed Amendment
Preferred		<ul style="list-style-type: none"> • Retail sales • Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property) • Personal services • Administrative and professional offices

		<ul style="list-style-type: none"> • Temporary outdoor sales, events, farmer’s markets, and festivals (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director
Permitted by Right	<ul style="list-style-type: none"> • Retail • Dining (including outdoor dining on private property) • Service • Professional office • Temporary outdoor sales, events, and festivals (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Self-service laundries • Veterinarian services • Gyms / training centers • Water (only) stores • Dental offices • Other similar uses as determined by the Planning Director
Permitted by Location	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units: residential units are only allowed on upper floors or within ground floor locations that do not have street frontage • Lodging: sleeping rooms are only allowed on upper floors or within ground floor locations that do not have street frontage 	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units: residential units are only allowed on upper floors or within ground floor locations that do not have street frontage • Lodging: sleeping rooms are only allowed on upper floors or within ground floor locations that do not have street frontage • Other similar uses as determined by the Planning Director
Director’s CUP	<ul style="list-style-type: none"> • Child care centers • Automobile sales/rentals (new/used) • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Self-service laundries • Medical services • Veterinarian services • Sidewalk dining • Events and festivals • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Child care centers • Automobile sales/rentals (new/used) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Medical services • Outdoor dining • Sidewalk dining • Temporary outdoor sales • Events and festivals • Bars and cocktail lounges • Kennels/animal hotels • Drive-thru eating establishments • Other similar uses as determined by Planning Director

Planning Commission CUP	<ul style="list-style-type: none"> • Bars and cocktail lounges • Smoke house, cigar lounge, hookah lounge • Places of assembly • Kennels/animal hotels • Drive-thrus • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Smoke house, cigar lounge, hookah lounge • Places of assembly • Automobile repair/service stations, car washes • Convalescent care/hospitals • Other similar uses as determined by the Planning Director
Prohibited	<ul style="list-style-type: none"> • Adult businesses • Medical marijuana dispensaries • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Adult businesses, stores, and entertainment establishments • Cannabis dispensaries and all related operations • Mini-storage and indoor/outdoor storage • Industrial/manufacturing • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director

East Village Neighborhood

Entitlement Type	Existing Plan	Proposed Amendment
Preferred		<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units • Personal services • Administrative and professional offices • Temporary outdoor sales (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director
Permitted by Right	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units • Service (as permitted by Section 27.200: Home Occupations of the Zoning Ordinance) • Temporary outdoor sales (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Child care centers • Water (only) stores • Other similar uses as determined by the Planning Director

<p>Permitted by Location</p>		<ul style="list-style-type: none"> ● Retail sales (adjacent to north-south streets) ● Gyms / training centers (adjacent to north-south streets) ● Other similar uses as determined by the Planning Director
<p>Director's CUP</p>	<ul style="list-style-type: none"> ● Service ● Professional office ● Child care centers ● Events and festivals ● Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> ● Events and festivals ● Retail sales ● Self-service laundries ● Veterinarian services ● Gyms / training centers ● Dental offices ● Other similar uses as determined by the Planning Director
<p>Planning Commission CUP</p>	<ul style="list-style-type: none"> ● Retail ● Dining (including outdoor dining on private property) ● Lodging ● Self-service laundries ● Medical services ● Veterinarian services ● Sidewalk dining ● Places of assembly ● Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> ● Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property) ● Lodging ● Medical services ● Sidewalk dining ● Places of assembly ● Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) ● Tattoo parlors ● Pawn shops ● Other similar uses as determined by the Planning Director
<p>Prohibited</p>	<ul style="list-style-type: none"> ● Automobile sales/rentals (new/used) ● Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) ● Tattoo parlors ● Pawn shops ● Liquor/convenience stores ● Smoke house, cigar lounge, hookah lounge ● Kennels/animal hotels ● Drive-thrus ● Bars and cocktail lounges ● Adult businesses ● Medical marijuana dispensaries 	<ul style="list-style-type: none"> ● Automobile sales/rentals (new/used) ● Liquor/convenience stores ● Smoke house, cigar lounge, hookah lounge ● Kennels/animal hotels ● Drive-thru eating establishments ● Bars and cocktail lounges ● Adult businesses, stores, and entertainment establishments ● Cannabis dispensaries and all related operations ● Mini-storage and indoor/outdoor storage ● Automobile repair/service stations, car washes

	<ul style="list-style-type: none"> • Mini-storage and indoor/outdoor storage • Automobile repair/service stations, car washes • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Warehousing • Other similar uses as determined by the Planning Director
--	--	---

East Village Enterprise

Entitlement Type	Existing Plan	Proposed Amendment
Preferred		<ul style="list-style-type: none"> • Preferred uses will be those listed in Table 27.92 of the Zoning Ordinance for Light Industrial (M-1) uses and Table 27.82 of the Zoning Ordinance for Service and Professional (C-P) uses, with exceptions noted in this table • Warehousing • Research and development • Administrative and professional offices • Temporary outdoor sales (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director
Permitted by Right	<ul style="list-style-type: none"> • Light Industrial • Warehousing • Research and development • Professional office • Temporary outdoor sales (per guidelines and parameters of City Council Resolution) • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Personal services • Retail sales (heavy duty such as auto parts and industrial products) • Self-service laundries • Gyms / training centers • Water (only) stores • Dental offices • Other similar uses as determined by the Planning Director
Permitted by Location		<ul style="list-style-type: none"> • Permitted by Location uses will be those listed in Table 27.92 of the Zoning Ordinance for Light Industrial (M-1) uses in enclosed buildings only, with exceptions noted in this table

		<ul style="list-style-type: none"> • Restaurants and other non-drive-thru eating establishments (including outdoor dining on private property, south of Main Street) • Caretaker's residences (1 per approved industrial, warehousing, storage, or auto sales use) • Other similar uses as determined by the Planning Director
Director's CUP	<ul style="list-style-type: none"> • Service • Retail • Dining (including outdoor dining on private property) • Child care centers • Events and festivals • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Uses subject to the Planning Director's CUP will be those listed in Table 27.92 of the Zoning Ordinance for Light Industrial (M-1) uses, with exceptions noted in this table • Retail sales (lower-intensity such as groceries and clothing) • Child care centers • Events and festivals • Medical services • Veterinarian services • Sidewalk dining • Liquor/convenience stores • Other similar uses as determined by the Planning Director
Planning Commission CUP	<ul style="list-style-type: none"> • Lodging • Self-service laundries • Medical services • Mini-storage and indoor/outdoor storage • Veterinarian services • Sidewalk dining • Places of assembly • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Uses subject to the Planning Commission CUP will be those listed in Table 27.92 of the Zoning Ordinance for Light Industrial (M-1) uses, with exceptions noted in this table • Lodging • Mini-storage and indoor/outdoor services • Places of assembly • Automobile sales/rentals (new/used) • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Tattoo parlors • Pawn shops • Smoke house, cigar lounge, hookah lounge • Kennels/animal hotels • Drive-thru eating establishments

		<ul style="list-style-type: none"> • Automobile repair/service stations, car washes • Other similar uses as determined by the Planning Director
<p>Prohibited</p>	<ul style="list-style-type: none"> • Attached Single-Family and Multi-Family Residential Units • Automobile sales/rentals (new/used) • Entertainment (movie theaters, arcades, bowling alleys, live performances, comedy clubs, etc.) • Tattoo parlors • Pawn shops • Liquor/convenience stores • Smoke house, cigar lounge, hookah lounge • Kennels/animal hotels • Drive-thrus • Bars and cocktail lounges • Adult businesses • Medical marijuana dispensaries • Automobile repair/service stations, car washes • Heavy industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Other similar uses as determined by the Planning Director 	<ul style="list-style-type: none"> • Prohibited uses will be those prohibited per Table 27.92 of the Zoning Ordinance within Light Industrial (M-1) zones, with exceptions noted in this table • Attached Single-Family and Multi-Family Residential Units • Bars and cocktail lounges • Adult businesses, stores, and entertainment establishments • Cannabis dispensaries and all related operations • Heavy industrial/manufacturing • Convalescent care/hospitals • Shooting galleries • Other similar uses as determined by the Planning Director

What are Preferred Uses?

There are typically three to four entitlement types: allowed-by-right uses, minor conditional use permits (CUPs), major conditional use permits, and prohibited uses. These determine what a property owner might be able to do with their property. **Preferred uses** are an additional subset of allowed-by-right uses that are especially desirable and more closely align with broader public goals and the specific community visions identified in past planning exercises.

These projects may be eligible for reduced fees, streamlined reviews, and technical assistance, effectively facilitating the development of such uses in areas of the City deemed important for revitalization. As determined by City leadership, these projects may also be highlighted by the City of Brawley as exemplary achievements that advance the community toward its identified goals.

To be eligible, project descriptions, schematics, and plans must demonstrate that **60% or more of the site or business operations fully align with the Preferred Use list for that location**. Projects are ineligible for Preferred Use status if any project component requires a Conditional Use Permit (CUP). Determinations of Similar Use do not apply. These projects are designed not to negatively impact other allowed-by-right uses.

NOTE: Preferred uses would still be subject to additional fees as indicated by staff. Preferred use fees are still subject to annual adjustments (e.g., CPI). Other fees imposed by other departments are still applicable to Preferred Use projects.

Example of How Fees Apply to Various Entitlement Types and Uses

Block A in Downtown Brawley was initially identified as a district suited for an enhanced pedestrian experience featuring small coffee shops and restaurants. To further revitalize this area, the Downtown Specific Plan was amended to expand the “allowed-by-right” uses to include barbershops, bookstores, retail shops, mini markets, etc. while further highlighting coffee shops and restaurants as “preferred use” businesses.

Entitlement Type	Use	Reasoning	Typical Fees
Preferred Use (also allowed by right)	Coffee shops, restaurants (non-drive-thru)	Encouraged to build as is. Closely aligns with the community vision	Reduced fees and other incentives
Allowed by Right	Barbershops, bookstores, shops, mini markets, drug stores, athletic facilities, gyms, dance studios	Can build as is. Activates community life without significant added intensity to existing City infrastructure	Standard fees (per updated fee schedule)
Director’s CUP (minor CUP)	Liquor stores, tattoo shops, sports stores (e.g., bike repair shops)	Might need slight changes. Requires technical review due to higher complexity. Might not necessarily bring about significant public benefit	Standard fees + subject to additional fees (e.g., CUP processing, supplemental drawings, CEQA)
Planning Commission CUP (major CUP)	Bowling alleys, arcades, event centers, places of worship, bars, medical and professional offices	Might need major adjustments. Requires technical review and public input because use may depart from the community vision	Standard fees + subject to additional fees (e.g., CUP processing, supplemental drawings, traffic studies, CEQA)
Prohibited	Shooting galleries, nightclubs, storage facilities, drive-thrus	Cannot build as it contradicts or undermines the community vision	Not permitted

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk
County of: Imperial

From: (Public Agency): City of Brawley
383 Main Street
Brawley, CA 92227

(Address)

Project Title: Downtown Specific Plan Amendment (DT26-01)

Project Applicant: City of Brawley

Project Location - Specific:

Downtown Brawley, Brawley, CA 92227

Project Location - City: Brawley Project Location - County: Imperial

Description of Nature, Purpose and Beneficiaries of Project:

The Plan amendment updates permitted land uses and entitlements within the Downtown Specific Plan area without increasing development intensity or approving any physical development, and is intended to support Downtown revitalization and business activity.

Name of Public Agency Approving Project: City of Brawley Planning Commission

Name of Person or Agency Carrying Out Project: City of Brawley Development Services Department

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: Sec. 15301 (Class 1 - Existing Facilities)
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

The project consists of regulatory amendments applicable to an existing, fully urbanized Downtown area and does not approve or authorize any physical development or expansion of use. The amendments allow additional uses within existing development standards and retain discretionary review for higher-intensity uses. As the action involves negligible or no expansion of existing use and no physical change to the environment, it is exempt pursuant to CEQA Guidelines §15301 (Class 1 - Existing Facilities).

Lead Agency
Contact Person: Cristhian Barajas Area Code/Telephone/Extension: (760) 344-8822

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: _____ Title: Development Services Director

▪ Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____



CITY OF BRAWLEY

Notice of Public Hearing City of Brawley

March 3, 2026

Notice is hereby given that a public hearing will be held by the City of Brawley Development Services Department on **April 1, 2026** at the time and place indicated below. The original public hearing date of **March 18, 2026** has been suspended. The purpose of the public hearing will be to hear comments from the public regarding the following subject:

<p>Subject: Downtown Project #26-01 Specific Plan Amendment #26-03 Zone Change #26-04</p>	<p>Location: Downtown Specific Plan Area</p> <p>Addresses affected by Zone Change - ZC: 300 block of "E" Street 301, 310, and 351 Main Street 300 block of "G" Street 115-135 S. Plaza Street</p> <p>ZC APNs: 046-213-012 thru -016 046-214-004 thru -006, -010 thru -012 048-062-002 thru -009 048-111-001 thru -004, -009, -010, and -035</p>
--	--

Downtown Project (DT) #26-01 is an amendment (SPA #26-03) to the Downtown Specific Plan that would expand the permitted, conditional, and prohibited uses within the Downtown Specific Plan Area. A new category of uses deemed "preferred" by the City will also be created. The associated Zone Change (ZC) #26-04 will reclassify certain portions of the Specific Plan Area between 3rd Street and Plaza Park from Civic Center to West Village.

Planning Commission Hearing Date: April 1, 2026
Hearing Time: 5:30 PM
Hearing Location: City of Brawley, Council Chambers
383 Main Street

Copies of pertinent information are available for review at the City Hall during regular business hours, Monday through Friday. If you would like to know more about the proposed project prior to the public hearing, please contact Adrian Ople, Planning Technician at (760) 344-8822.

Any person wishing to comment on the above project may do so in writing or may appear in person at the public hearing. The written public comment period began on February 24, 2026 and will now end on March 26, 2026. Written comments should be directed to Emmet Fried, Assistant to the City Manager, 383 Main Street, Brawley, CA 92227. Please reference the project name in all written correspondence.

PLANNING COMMISSION STAFF REPORT

Project: Zoning Ordinance Amendment (ZOR) #26-01 –
Caretaker’s Residences

Applicant(s): City of Brawley

Location: Citywide

**PLANNING COMMISSION PUBLIC HEARING
APRIL 1, 2026, 5:30 P.M.
CITY COUNCIL CHAMBERS
383 MAIN STREET, BRAWLEY, CALIFORNIA 92227**

Zoning Ordinance Amendment: ZOR26-01 – Caretaker’s Residences

Background:

Recently, mini-storage and vehicle storage developers within the City of Brawley have requested permits to develop caretaker’s residences on the site of their commercial operations. Caretaker’s residences are listed in Tables 27.82 & 27.92 of the City of Brawley Zoning Ordinance. However, these residences and their limitations are not clearly defined anywhere within the Zoning Ordinance.

Currently, the Zoning Ordinance only allows caretaker’s residences as accessory uses by right in M-2 (Heavy Industrial) zones. Only two parcels in the entire city are zoned M-2. Despite being zones that often house various kinds of storage facilities and other intensive uses that benefit from onsite security and management, C-3 (Heavy Commercial) and M-1 (Light Industrial) zones may only house caretaker’s residences with conditional use permits approved by either the Planning Commission (for C-3) or the Planning Director (for M-1). Because of their importance to the smooth operation of facilities in these zones, the Development Services Department has proposed an amendment to the Zoning Ordinance that defines caretaker’s residences, establishes their limitations, and relaxes restrictions on their developments in C-3 and M-1 zones.

General Information:

The proposed ordinance amendment modifies Section 27.33 of the Zoning Ordinance to add “caretaker” and “caretaker’s residence” to the list of terms found in Article II. Definitions. “Caretaker” is defined as “a person residing on a commercial or industrial property and provides customer assistance, property maintenance, overnight security, and/or other duties as an employee of a permitted business on said property,” while “caretaker’s residence” is defined as “a residential dwelling unit secondary to a primary commercial or industrial use and used to provide on-site living and sleeping accommodations for a watchman, guard, caretaker, custodian, supervisor, manager, janitor, or other employee of said primary use, and his or her family; with rental to non-employees prohibited.” These definitions ensure that these units are not abused as residential rental units in non-residential zones.

The proposed ordinance amendment also modifies Tables 27.82 & 27.92 of the Zoning Ordinance which list permitted, accessory, conditional, and prohibited uses in Commercial (Article V) and Industrial (Article VI) zoning districts. The columns for C-3 and M-1 zones are amended to allow caretaker’s residences as accessory uses by right.

Environmental Information:

The proposed project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3) (Common Sense Exemption).

The project consists of a regulatory amendment applicable to existing commercial and industrial areas and does not approve or authorize any physical development. Since the action would at most only allow the development of one residential unit per commercial/industrial parcel, it can be said with certainty that there is no possibility for this project to have a significant impact on the environment.

Zoning Ordinance Amendment: ZOR26-01 – Caretaker’s Residences

Furthermore, none of the exceptions to the use of a categorical exemption set forth in CEQA Guidelines Section 15300.2 apply to the project. The project site is not located within a sensitive environmental area, does not involve unusual circumstances, does not result in cumulative impacts, and would not cause a substantial adverse change in the significance of a historical resource."

Therefore, the project qualifies for a Common Sense Exemption, and a Notice of Exemption (NOE) will be filed following project approval.

Staff Recommendation:

Based on the information provided, City staff recommends **approval** of the proposed Zoning Ordinance Amendment.

The recommendation is based on the following findings:

1. The proposal is exempt from CEQA pursuant to Section 15061(b)(3).
2. It is unlikely the project will cause significant environmental impacts.
3. Approval of the Zoning Ordinance Amendment would not be detrimental to the public welfare or detrimental to the health and safety of the residents of the City of Brawley.

Department/Public Agency Comments:

Building Department:

N/A

Public Works:

N/A

Fire Department Notes:

N/A

Planning Department:

Recommend approval of the proposed Zoning Ordinance Amendment.

ATTACHMENTS: Proposed Amendment, NOE

ORDINANCE NO. _____

**ORDINANCE OF THE CITY COUNCIL OF THE CITY OF BRAWLEY,
CALIFORNIA, AMENDING ARTICLES II, V, & VI OF THE ZONING
ORDINANCE.**

THE CITY COUNCIL OF THE CITY OF BRAWLEY DOES ORDAIN AS
FOLLOWS:

1. Findings:

The City Council finds as follows:

a. The existing Zoning Ordinance's list of definitions does not define "caretaker" or "caretaker's residence" under the "C" section of Article II; and

b. The City's existing regulations for caretaker's residences in Heavy Commercial (C-3) and Light Manufacturing (M-1) zones, as found in Articles V & VI of the Zoning Ordinance, are very restrictive, requiring a Conditional Use Permit approved by either Planning Commission (C-3 zones) or the Planning Director (M-1 zones) to be obtained for development; and

c. City staff has found said restrictiveness to be an obstacle for the development of caretaker's residences as accessory uses necessary for the efficient operation or primary uses in C-3 and M-1 zones, such as mini-storage facilities and vehicle rental services; and

d. Council now has sufficient information to amend Section 27.33 of the Zoning Ordinance to define "caretaker" and "caretaker's residence"; and

e. Council now has sufficient information to revise Zoning Ordinance Tables 27.82 & 27.92 governing permitted uses, accessory uses, conditional uses, and prohibited uses in commercial and manufacturing zones.

2. Amendment of Zoning Ordinance:

Section 27.33 of the Zoning Ordinance and the rows of Tables 27.82 & 27.92 concerning Caretaker's Residences in Articles V & VI of the Zoning Ordinance are hereby amended to read as follows:

Sec. 27.33. - "C."

"Caretaker" means a person residing on a commercial or industrial property and provides customer assistance, property maintenance, overnight security, and/or other duties as an employee of a permitted business on said property.

"Caretaker's residence" means a residential dwelling unit secondary to a primary commercial or industrial use and used to provide on-site living and sleeping accommodations for a watchman, guard, caretaker, custodian, supervisor, manager, janitor, or other employee of said primary use, and his or her family; with rental to non-employees prohibited.

...

**Table 27.82
Uses by Commercial Zoning District**

Commercial Zoning District Uses	C-P	C-1	C-2	C-3
...
Caretaker's residence	X	C	C	€ <u>A</u>
...

**Table 27.92
Uses by Manufacturing and Industrial Zoning District**

Industrial Zoning District Uses	M-1	M-2
...
Caretaker's residence	€* <u>A</u>	A
...

3. Effective Date:

This ordinance shall be effective thirty (30) days after its adoption and the City Clerk shall cause a certified copy of this ordinance to be published one time within fifteen (15) days after its adoption in the Imperial Valley Press, a newspaper of general circulation printed in Imperial County and circulated in the City of Brawley.

APPROVED, PASSED, AND ADOPTED at a regular meeting of the City Council on the Nth day of MONTH, 202X.

CITY OF BRAWLEY, CALIFORNIA

JJ Galvan, Mayor

ATTEST:

Ana Gutierrez, City Clerk

STATE OF CALIFORNIA)
COUNTY OF IMPERIAL)
CITY OF BRAWLEY)

1st Reading

I, *Ana Gutierrez*, City Clerk of the City of Brawley, California, **DO HEREBY CERTIFY** that the foregoing Ordinance No. 2026-__ was passed and adopted by the City Council of the City of Brawley, California, at a regular meeting held on the ____ day of _____, 2026 and that it was so adopted by the following roll call vote:

AYES:

NAYES:

ABSTAIN:

ABSENT:

DATED:

Ana Gutierrez, City Clerk

2nd Reading & Adoption

I, Ana Gutierrez, Deputy City Clerk of the City of Brawley, California, **DO HEREBY CERTIFY** that the foregoing Ordinance No. 2026-__ was passed and adopted by the City Council of the City of Brawley, California, at a regular meeting held on the __ day of _____, 2026 and that it was so adopted by the following roll call vote:

AYES:

NAYES:

ABSTAIN:

ABSENT:

DATED:

Ana Gutierrez, City Clerk

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: (Public Agency): City of Brawley
383 Main Street
Brawley, CA 92227

County Clerk
County of: Imperial

(Address)

Project Title: Caretaker's Residence Zoning Amendment (ZOR26-01)

Project Applicant: City of Brawley

Project Location - Specific:

Citywide

Project Location - City: Brawley Project Location - County: Imperial

Description of Nature, Purpose and Beneficiaries of Project:

The City of Brawley intends to amend its Zoning Ordinance to relax existing restrictions on the development of caretaker's residences in heavy commercial and light industrial zones due to their importance to the efficient operation of certain types of businesses. The proposed amendment would also define caretaker's residences and caretakers to ensure that such units are only rented out to employees of these businesses.

Name of Public Agency Approving Project: City of Brawley

Name of Person or Agency Carrying Out Project: City of Brawley Development Services Department

Exempt Status: **(check one):**

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: Sec. 15061(b)(3) - Common Sense Exemption
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

The project consists of a regulatory amendment applicable to existing commercial and industrial areas and does not approve or authorize any physical development. Since the action would at most only allow the development of one residential unit per commercial/industrial parcel, it can be said with certainty that there is no possibility for this project to have a significant impact on the environment. Therefore, the Common Sense Exemption (Sec. 15061(b)(3)) would apply.

Lead Agency
Contact Person: Cristhian Barajas Area Code/Telephone/Extension: (760) 344-8822

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: _____ Title: Development Services Director

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

PLANNING COMMISSION STAFF REPORT

Project: Zoning Ordinance Amendment (ZOR) #26-02 –
Water Dispensing Stations

Applicant(s): City of Brawley

Location: Citywide

**PLANNING COMMISSION PUBLIC HEARING
APRIL 1, 2026, 5:30 P.M.
CITY COUNCIL CHAMBERS
383 MAIN STREET, BRAWLEY, CALIFORNIA 92227**

Zoning Ordinance Amendment: ZOR26-02 – Water Dispensing Stations

Background:

Recently, a commercial property owner within the City expressed a desire to open a purified water store in a Service & Professional (C-P) zone. The approval of this property owner's application required a Similar Use Determination due to the lack of "water dispensing stations" as an item in the list of permitted, accessory, conditional, and prohibited uses for commercial zones (Article V). Water dispensing stations are distinguished from other retail outlets in that they only sell purified water. While similar in intensity to drug stores and pharmacies, water dispensing stations still differ from these land uses due to their focus on only dispensing water. Therefore, the Development Services Department has found it necessary to amend the Zoning Ordinance to define "water dispensing stations" and establish their status as allowed by right in all commercial zones.

General Information:

The proposed ordinance amendment modifies Section 27.53 of the Zoning Ordinance to add "water dispensing station" to the list of terms found in Article II. Definitions. "Water dispensing station" is defined as "an indoor commercial space where only purified water, packaged ice, and vessels incidental to water dispensing (e.g., plastic water containers) are sold, with food, other beverages, and unrelated non-food items strictly prohibited." This definition ensures that these stores are not used as a loophole to engage in regular retail commercial operations in low-intensity commercial zones.

The proposed ordinance amendment also modifies Tables 27.82 of the Zoning Ordinance, which lists permitted, accessory, conditional, and prohibited uses in Commercial zoning districts. A row is inserted in the table for "water dispensing stations" that indicates its status as permitted by right in all commercial zones.

Environmental Information:

The proposed project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)(3) (Common Sense Exemption).

The project consists of a regulatory amendment applicable to existing commercial and industrial areas and does not approve or authorize any physical development. Since commercial operations at water dispensing stations predominantly rely on the municipal water supply and do not depend on external delivery or high-intensity activities, it can be said with certainty that there is no possibility for this project to have a significant impact on the environment.

Furthermore, none of the exceptions to the use of a categorical exemption set forth in CEQA Guidelines Section 15300.2 apply to the project. The project site is not located within a sensitive environmental area, does not involve unusual circumstances, does not result in cumulative impacts, and would not cause a substantial adverse change in the significance of a historical resource."

Therefore, the project qualifies for a Common Sense Exemption, and a Notice of Exemption (NOE) will be filed following project approval.

Zoning Ordinance Amendment: ZOR26-02 – Water Dispensing Stations

Staff Recommendation:

Based on the information provided, City staff recommends **approval** of the proposed Zoning Ordinance Amendment.

The recommendation is based on the following findings:

1. The proposal is exempt from CEQA pursuant to Section 15061(b)(3).
2. It is unlikely the project will cause significant environmental impacts.
3. Approval of the Zoning Ordinance Amendment would not be detrimental to the public welfare or detrimental to the health and safety of the residents of the City of Brawley.

Department/Public Agency Comments:

Building Department:

N/A

Public Works:

N/A

Fire Department Notes:

N/A

Planning Department:

Recommend approval of the proposed Zoning Ordinance Amendment.

ATTACHMENTS: Proposed Amendment, NOE

ORDINANCE NO. _____

**ORDINANCE OF THE CITY COUNCIL OF THE CITY OF BRAWLEY,
CALIFORNIA, AMENDING ARTICLE II & V OF THE ZONING
ORDINANCE.**

THE CITY COUNCIL OF THE CITY OF BRAWLEY DOES ORDAIN AS
FOLLOWS:

1. Findings:

The City Council finds as follows:

a. The Brawley Zoning Ordinance's list of definitions does not define "water store" under the "W" section of Article II; and

b. Article V of the Zoning Ordinance does not currently list "water stores" as a permitted, accessory, conditional, or prohibited use within commercial zones; and

c. City staff has found that the consideration of water stores as a subtype of conventional retail outlets would result in an unnecessary prohibition against water stores in Service & Professional (C-P) zones; and

d. Council now has sufficient information to amend Section 27.53 of the Zoning Ordinance to define "water store"; and

e. Council now has sufficient information to revise Zoning Ordinance Table 27.82 governing permitted, accessory, conditional, and prohibited uses in commercial zones.

2. Amendment of Zoning Ordinance:

Section 27.53 of the Zoning Ordinance and Table 27.82 in Article V of the Zoning Ordinance are hereby amended to read as follows:

Sec. 27.53. - "W."

"Water store" means an indoor commercial space where only purified water, packaged ice, and vessels incidental to water dispensing (e.g., plastic water containers) are sold, with food, other beverages, and unrelated non-food items strictly prohibited.

...

**Table 27.82
Uses by Commercial Zoning District**

Commercial Zoning District Uses	C-P	C-1	C-2	C-3
...
Watch repair shops	X	P	P	P
<u>Water stores</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>
Water wells, reservoirs (storage/distribution systems)	X	C	C	C
...

3. Effective Date:

This ordinance shall be effective thirty (30) days after its adoption and the City Clerk shall cause a certified copy of this ordinance to be published one time within fifteen (15) days after its adoption in the Imperial Valley Press, a newspaper of general circulation printed in Imperial County and circulated in the City of Brawley.

APPROVED, PASSED, AND ADOPTED at a regular meeting of the City Council on the Nth day of MONTH, 202X.

CITY OF BRAWLEY, CALIFORNIA

JJ Galvan, Mayor

ATTEST:

Ana Gutierrez, City Clerk

**STATE OF CALIFORNIA)
COUNTY OF IMPERIAL)
CITY OF BRAWLEY)**

1st Reading

I, Ana Gutierrez, City Clerk of the City of Brawley, California, **DO HEREBY CERTIFY** that the foregoing Ordinance No. 2026-__ was passed and adopted by the City Council of the City of Brawley, California, at a regular meeting held on the ___ day of _____, 2026 and that it was so adopted by the following roll call vote:

AYES:

NAYES:

ABSTAIN:

ABSENT:

DATED:

Ana Gutierrez, City Clerk

2nd Reading & Adoption

I, Ana Gutierrez, Deputy City Clerk of the City of Brawley, California, **DO HEREBY CERTIFY** that the foregoing Ordinance No. 2026-__ was passed and adopted by the City Council of the City of Brawley, California, at a regular meeting held on the ___ day of _____, 2026 and that it was so adopted by the following roll call vote:

AYES:

NAYES:

ABSTAIN:

ABSENT:

DATED:

Ana Gutierrez, City Clerk

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk

County of: Imperial

From: (Public Agency): City of Brawley
383 Main Street
Brawley, CA 92227

(Address)

Project Title: Water Stores Zoning Amendment (ZOR26-02)

Project Applicant: City of Brawley

Project Location - Specific:

Citywide

Project Location - City: Brawley Project Location - County: Imperial

Description of Nature, Purpose and Beneficiaries of Project:

The City of Brawley intends to amend its Zoning Ordinance to explicitly define "water stores" and allow for their development by right within commercial zones of any intensity. The proposed amendment intends to remove any ambiguity within the Zoning Ordinance regarding whether water stores are considered retail outlets and in turn remove unnecessary obstacles to their development.

Name of Public Agency Approving Project: City of Brawley

Name of Person or Agency Carrying Out Project: City of Brawley Development Services Department

Exempt Status: **(check one):**

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: Sec. 15061(b)(3) - Common Sense Exemption
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

The project consists of a regulatory amendment applicable to existing commercial areas and does not approve or authorize any physical development. Since commercial operations at water dispensing stations predominantly rely on the municipal water supply and do not depend on external delivery or high-intensity activities, it can be said with certainty that there is no possibility for this project to have a significant impact on the environment. Therefore, the Common Sense Exemption (Sec. 15061(b)(3)) would apply.

Lead Agency

Contact Person: Cristhian Barajas Area Code/Telephone/Extension: (760) 344-8822

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: _____ Title: Development Services Director

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____



FEBRUARY 2026

SERVICE AREA PLAN (SAP)

CITY OF BRAWLEY



5620 FRIARS ROAD
SAN DIEGO, CA 92110
T: 619.291.0707
RICKENGINEERING.COM

Table of Contents

Chapter		Page
1	EXECUTIVE SUMMARY	1
	1.1 INTRODUCTION	1
	1.2 PUBLIC SERVICES & FACILITIES	3
	1.2.1 Administrative Facilities	3
	1.2.2 Flood Control/Drainage Facilities.....	3
	1.2.3 Fire Facilities	3
	1.2.4 Law Enforcement Facilities.....	4
	1.2.5 Library Facilities	5
	1.2.6 Parks and Recreation Facilities	5
	1.2.7 Circulation Facilities	6
	1.2.8 Wastewater Facilities	7
	1.2.9 Water Facilities.....	8
2	INTRODUCTION	13
	2.1 BACKGROUND ON THE CITY OF BRAWLEY	13
	2.2 PURPOSE OF THE SERVICE AREA PLAN	13
	2.3 ORGANIZATION AND USE OF THE SERVICE AREA PLAN	15
3	GROWTH AND PHASING PROJECTIONS	19
	3.1 EXISTING LAND USE	19
	3.2 PLANNED LAND USE	19
	3.3 BUILDOUT PROJECTIONS.....	23
4	PUBLIC FACILITIES AND SERVICES.....	27
	4.1 ADMINISTRATIVE FACILITIES	29
	4.1.1 Performance Standards	29
	4.1.2 Facility Planning and Adequacy Analysis.....	29
	4.1.3 Funding.....	31
	4.1.4 Recommendations	32
	4.2 FLOOD CONTROL/DRAINAGE FACILITIES	34
	4.2.1 Performance Standards	34
	4.2.2 Facility Planning and Adequacy Analysis.....	34
	4.2.3 Funding.....	38
	4.2.4 Recommendations	39
	4.3 FIRE FACILITIES.....	43

4.3.1	Performance Standards	43
4.3.2	Facility Planning and Adequacy Analysis.....	44
4.3.3	Funding.....	47
4.3.4	Recommendations	48
4.4	LAW ENFORCEMENT	50
4.4.1	Performance Standards	50
4.4.2	Facility Planning and Adequacy Analysis.....	50
4.4.3	Mitigation	53
4.4.4	Funding.....	54
4.5	LIBRARY FACILITIES.....	55
4.5.1	Performance Standards	55
4.5.2	Facility Planning and Adequacy Analysis.....	55
4.5.3	Mitigation.....	58
4.5.4	Funding.....	58
4.5.5	Recommendations	59
4.6	PARKS AND RECREATION FACILITIES	61
4.6.1	Performance Standards	61
4.6.2	Facility Planning and Adequacy Analysis.....	61
4.6.3	Adequacy of Existing Facilities and Staff.....	63
4.6.4	Future Demand for Facilities and Staff.....	63
4.6.5	Opportunities for Shared Facilities	65
4.6.6	Phasing.....	65
4.6.7	Mitigation	66
4.6.8	Funding.....	66
4.7	CIRCULATION FACILITIES.....	70
4.7.1	Performance Standards	70
4.7.2	Facility Planning and Adequacy Analysis.....	74
4.7.3	Funding.....	78
4.7.4	Recommendations	79
4.8	WASTEWATER FACILITIES	81
4.8.1	Performance Standards	81
4.8.2	Facility Planning and Adequacy Analysis.....	81
4.8.3	Funding.....	86
4.8.4	Recommendations	88
4.9	WATER FACILITIES.....	91

4.9.1	Performance Standards	91
4.9.2	Facility Planning and Adequacy Analysis.....	92
4.9.3	Funding.....	96
4.9.4	Recommendations	97
4.10	AVAILABILITY OF SERVICES NOT PROVIDED BY THE CITY.....	100
4.10.1	Schools	100
4.10.2	Electric.....	100
4.10.3	Telecommunications.....	101
4.10.4	Natural Gas.....	101
4.10.5	Airport Facilities.....	101
5	FINANCING.....	104
5.1	INTRODUCTION	104
5.2	EXISTING REVENUE SOURCES	104
5.2.1	Taxes.....	105
5.2.2	Intergovernmental Sources.....	105
5.2.3	Service Charges and Impact Fees	105
5.2.4	Miscellaneous Revenue.....	106
5.3	FUTURE REVENUE SOURCES	106
5.3.1	Local Funding.....	106
5.3.2	State and Federal Funding	107

Figures

Title	Page
4-1 Regional Location.....	11
4-2 City Limits and Sphere of Influence Boundary	12
2-1 Specific Plan Map.....	18
4-3 General Plan Land Use	22
7-1 Land Use Phasing Plan	25
4-4 Canals, Drains and Flood Zones	33
4-5 Designated Open Space	60
--- Rancho Los Lagos Park, Open Space, & Amenity Diagram	64
4-6 Circulation System.....	68
3-2 Street Design Plan.....	77
4-7 Existing Wastewater System	80
4-8 Water Treatment Facilities.....	89

Tables

Title	Page
3.3-1 Brawley Buildout Projections	24
3.3-2 Rancho Los Lagos Buildout Projections	24
3.3-3 YK America Buildout Projections	24
4.1-1 Existing Administrative Facilities	29
4.3-2 Existing Fire Facilities	44
4.4-2 Existing Law Enforcement Facilities	50
4.4-3 Adequacy of Existing Law Enforcement Facilities.....	51
4.4-4 Adequacy of Future Law Enforcement Facilities.....	52
4.5-1 Existing Library Facilities	55
4.5-2 Adequacy of Existing Library Facilities and Staff	56
4.5-3 Adequacy of Future Library Facilities	57
4.6-2a Existing Parks and Recreation Facilities	62
4.6-2b Existing Community Center Facilities	63
4.6-4 Total Open Space Area.....	65
4.7-1 Level of Service for Brawley Circulation Performance Criteria	73
4.7-2 ADT Level of Service Volumes by Roadway Types.	73
4.8-1 Existing and Projected Wastewater Flow and Capacity	81
4.9-1 Water System Supply and Demand	91
4.9-2 Existing Water Facilities	92

Acronyms

AB	Assembly Bill
AC	asbestos cement
ADT	average daily traffic
BEIF	Border Environment Infrastructure Funding
BESD	Brawley Elementary School District
BUHSD	Brawley Union High School District
Caltrans	California Department of Transportation
CFD	Community Facilities District
CFDs	Community Facility Districts
CI	cast iron
CIP	Capital Improvement Program
DIF Study	Development Impact Fee Justification Study
FTE	full-time employee
FY	fiscal year
I-	Interstate
IID	Imperial Irrigation District
ISO	Insurance Services Office, Commercial Risk Services, Inc.
kV	kilovolt
KWh	kilowatt hours
LAFCO	Local Agency Formation Commission
LAMBS	Literacy and Mobile Book Services
LOS	level of service
LVA/IV	Literacy Volunteers of America/Imperial Valley
MG	million gallons
MGD	million gallons per day
MW	megawatts
PVC	polyvinyl chloride
RLL	Rancho Los Lagos
RWQCB	Regional Water Quality Control Board
SAP	Service Area Plan
SCAG	Southern California Association of Governments
sf	square feet
SOI	Sphere of Influence
SR-	State Route
SWRCB	State Water Resources Control Board
WTP	Water Treatment Plant
WWTP	wastewater treatment plant

1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This Service Area Plan (SAP) is intended to demonstrate the City of Brawley’s (City’s) intent and ability to provide adequate services within the City limits, including the Sphere of Influence (SOI) boundaries, as defined by the Imperial Valley Local Agency Formation Commission (LAFCO), at the time of annexation. This document outlines the City’s existing public services and facilities, estimates their current and future anticipated demand, and describes how necessary facilities and services will or may be developed and extended to meet these demands. Future growth is evaluated over 20 years (2025–2045) using reports from City staff.

As the third-largest city in Imperial County, Brawley’s population was reported to be 27,792 in the 2020 United States Census. The California Department of Finance estimates that the 2023 population is 28,451, while City staff have advised that the current population is now 35,000. Existing development within the City includes a variety of residential, commercial, and industrial land uses, as well as public services such as schools, parks, and other administrative City facilities. Areas within the Brawley SOI are primarily farmland or vacant land; however, General Plan land use designations in the SOI include some industrial, public facility, and residential land uses.

The following is a brief summary of the facilities, existing adequacy and needs, and future demand for the public services and facilities areas examined in this SAP. It should be noted that the following discussion is substantially abbreviated from that contained in the rest of the document and is not meant to replace the comprehensive discussion provided in Sections 2 through 5 of this SAP. The SAP also includes two significant annexations, Rancho Los Lagos (RLL) and the Rio Vista Brawley Apartments Annexation which are described in the following paragraphs.

The Rancho Los Lagos (RLL) Specific Plan is located in Imperial County, California, adjacent to the southern border of the City of Brawley, within the City’s Sphere of Influence. The plan outlines a pedestrian-oriented residential community in the Imperial Valley, designed to integrate parks, schools, and amenities within walking distance of homes along tree-lined streets. Comprising four main components—conventional residential areas, an active adult community, a golf course, and a business park—RLL aims to meet diverse housing needs while enhancing community connectivity and quality of life.

The conventional residential areas offer a mix of single-family detached, attached, and multi-family homes, complemented by a commercial/multi-family mixed-use zone for retail and apartment developments. Strong pedestrian links are planned to connect residential and commercial spaces, facilitating convenience and accessibility. Additionally, RLL includes provisions for essential community services like a fire station and potential sites for religious facilities.

An active adult community, designed for residents aged 55 and over, features detached and attached homes alongside private homeowner association (HOA) amenities. Alternatively, a gated conventional residential neighborhood may be developed if market conditions dictate. To support residential growth, RLL provides for an elementary school site if necessary.

Central to RLL’s focus is a 42-acre community park and an 18-hole executive golf course, spanning 181 acres of open space within the core area. This parkland incorporates lakes and water features to enhance community identity and recreational opportunities. Additionally, neighborhood parks and a network of trails connect residential areas to these central amenities,

promoting outdoor activities and community interaction.

Commercial and mixed-use developments in the northeast and business park areas offer employment opportunities, retail services, and entertainment options for residents. The business park, proposed east of the Southern Pacific Railroad, includes potential facilities such as an electric substation and wastewater treatment plant, aimed at supporting local employment and infrastructure needs.

The development of RLL will proceed in phases over several years, adapting to market conditions and infrastructure requirements. Each phase will include proportional infrastructure and community facilities aligned with residential development. RLL also allows flexibility for cultural and community uses across various sites within the development area.

RLL outlines a comprehensive vision for a vibrant, integrated community that balances residential, recreational, and commercial needs. By emphasizing pedestrian-friendly design, ample green spaces, and diverse housing options, RLL aims to create a sustainable and desirable living environment for current and future residents of the Imperial Valley.

The Rio Vista Brawley Apartments Annexation involves approximately 4.28 acres proposed for incorporation into the City of Brawley. Located adjacent to the northwest City boundary within the City's sphere of influence, the site is currently an unincorporated County "island" entirely surrounded by City boundaries. Annexation would resolve jurisdictional inconsistencies and support efficient service delivery.

The proposed project includes 144 market-rate apartment units within a five-building complex, along with a clubhouse, pool, and open space amenities. The site is proposed to be pre-zoned R-3 (High Density Residential) to allow for the intended multi-family residential use, consistent with the City's land use and housing objectives. Infrastructure improvements include connection to existing City sewer services. The project supports infill development, eliminates fragmented jurisdictional boundaries, and promotes orderly growth consistent with the City's General Plan and service area planning goals.

This SAP is intended to demonstrate the City's ability to accommodate existing and future residents through effective provision of essential public services and utilities, ensuring sustainable development and enhancing the quality of life for all community members. The plan outlines strategic initiatives and resource allocations aimed at maintaining and improving infrastructure, public safety, health services, transportation, education, and recreational facilities. Through collaborative efforts with stakeholders and continuous assessment of service delivery, the City is committed to providing a high standard of living and meeting the evolving needs of its residents.

1.2 PUBLIC SERVICES AND FACILITIES

1.2.1 Administrative Facilities

The City of Brawley faces significant challenges in meeting its administrative facility needs amidst a growing population. Currently, a majority of administrative functions are housed within various buildings in the Civic Center, which includes critical departments like Development Services, Finance, and the Main Branch Library, as well as public access counters for services such as building permits and water and sewer utility payments. Despite this centralization, the City falls short of recommended performance standards for administrative personnel and facility space, requiring an additional 75.6 square feet per 1,000 residents to meet standards. With 16 full-time administrative staff currently employed and a projected population of 58,758 residents by 2045, the City anticipates a need for 28 additional full-time staff members to manage increasing operational demands. Funding for administrative facilities primarily comes from development impact fees, grants, and the General Fund supported by various taxes and fees. The City passed a 1% transactional sales tax in support of Public Safety, Streets, and Essential Services. In the future, the City aims to increase, expanding the City Hall Complex by 2,500 square feet, and constructing a new 20,000 square foot Public Works/Engineering/Development Services Building. The City aims to consolidate administrative offices for efficiency, continue leveraging grants and development impact fees, and maintain a proactive approach to meeting future facility and staffing needs. An updated DIF study planned for 2026 will guide funding allocations for these administrative facility expansions.

1.2.2 Flood Control/Drainage Facilities

The study area within Imperial County and the Imperial Irrigation District (IID) is not a designated flood plain. The IID manages drainage from agricultural lands through numerous structures, while the City of Brawley's drainage system, partly combined with the sewer system, often causes wastewater treatment plant overloads during rainstorms. This combined system is primarily located in older city areas. Future development within the City's Sphere of Influence (SOI) may necessitate constructing detention basins, curbs, gutters, catch basins, and underground storm drains, and potentially relocating existing canals and drains.

New developments must address drainage issues to meet City and IID standards, protecting downstream properties and managing storm runoff effectively. The City plans to separate stormwater from the combined sewer system, improve drainage infrastructure, and develop a stormwater resource plan by 2028. All projects must comply with the Regional Water Quality Control Board and the City's Storm Water Management Plan.

Regarding Rancho Los Lagos (RLL), its Storm Drain Master Plan includes strategically placed flood control basins and an underground storm drain system designed to manage a hundred-year storm event. Flood control basins, coupled with stormwater ponding in the Community Park and golf course, provide the necessary flood protection volume. The final engineering details will adhere to County guidelines, ensuring the effective mitigation of peak flows and enhancing the overall resilience of RLL's drainage infrastructure.

1.2.3 Fire Facilities

The City of Brawley provides fire suppression, fire protection, and emergency medical services within the current City limits to both residential and commercial structures and to both citizens and employees in Brawley. Currently, Imperial County contracts with the City to provide personnel for fire suppression in the unincorporated area surrounding the City. The existing

facilities include a main fire station and substation, four fire engines, one utility vehicle, one ladder truck, two rescue vehicle, one staff vehicle, and two command vehicles. There are currently 22 full time fire department staff. and several call-paid reserves.

The current fire insurance classification for the City of Brawley continues to be appropriate; however, the ratio of firefighters per 1,000 population is less than the recommended level. The services provided by Imperial County to provide personnel for fire suppression in the unincorporated area surrounding the City are not adequate to service the SOI. Response times and all the fire facilities are below the City's performance standards: main fire station, fire substation, fire engine, ladder truck, rescue vehicle, utility vehicle, staff vehicle, and command vehicle.

Based on the projected population for 2045, a total of 57 full-time firefighters will be needed by the year 2045. It is recommended that the City pursue additional finances to fund additional, personnel, equipment, and vehicles of the Fire Department and to hire additional full-time firefighters to meet the City's population-based standard of 1 firefighter per 1,000 population.

The development of Rancho Los Lagos will necessitate the construction of a new fire station to adequately support the future population growth in the area. This station will play a crucial role in ensuring prompt emergency response times and enhanced fire protection services for residents and businesses within the community. By strategically planning and constructing this fire station alongside the development, the City aims to proactively address public safety needs and ensure that essential services are readily accessible as the population expands. This initiative underscores the City's commitment to maintaining high standards of safety and emergency preparedness for its growing community.

1.2.4 Law Enforcement Facilities

The Brawley Police Department is the primary law enforcement agency serving residents of Brawley within City boundaries. The Brawley Police Department operates out of one police station located within the Civic Center. Sworn officers patrol the City and respond to reports of crime, requests for law enforcement services and emergencies. Non-sworn personnel are responsible for graffiti abatement, general labor, and several administrative tasks and provide dispatch services for the Brawley, Westmorland and Calipatria Police and Fire Departments. Existing facilities include: a police station, eight marked patrol cars, two marked school resource cars, one crime scene investigation truck, one marked community liaison van, and one marked utility truck. The Brawley Police Department has 33 sworn officers, 18 fulltime and one part-time non-sworn personnel.

The Brawley Police Department's average response time to priority calls within the City limits is 10 minutes. Patrol staffing levels consist of one supervisor and four officers most days and nights; however, staffing shortages frequently lower the number of on-duty sworn officers to a supervisor and two officers. Population-based standards show insufficient staffing levels for both sworn officers and non-sworn personnel.

The ratio of full-time officers per 1,000 residents varies depending on several factors besides population. Based on the formula outlined in Table 4.4-4 Adequacy of Future Law Enforcement Facilities, the police department staffing should include 88 sworn officers by 2045. Additional marked patrol vehicles and unmarked vehicles would be required to service the community, which carries the accompanying requirement for additional equipment needs.

As development occurs within the City and through annexation, project applicants will be required to evaluate their project's fiscal impact on existing and future public safety services.

It is recommended that the City obtain additional personnel and facilities to meet the existing and future deficit identified according to the population-based standard for police services and facilities and continue the periodic review of the number of calls and response times to determine the adequacy of existing service and any need for improvement or additional resources.

1.2.5 Library Facilities

The City of Brawley owns and operates a 6,515-square-foot library facility in Plaza Park near City Hall that serves the entire population of the City of Brawley from one facility. The City also owns and operates the Del Rio Branch Public Library located at 1501 I Street which is 2,400 square feet. Services provided by the library include: circulation of library materials to all patrons; reference service, including telephone reference service; audio visual services, including recorded books and DVD's; Spanish language books; book reservations; inter-library loan service; and special children's programming including school class visits, story hours, movies, and craft programs.

Brawley Library Services currently has 3 full-time employees and 4 part-time employees for a total of 7 employees. The Brawley Public Library has 11 computers and 43,529 library books and the Del Rio Branch Public Library has 2 computers, and 5,176 library books. The library lends books, audiobooks, eBooks, DVDs, and toys at both library branches. The Del Rio branch also offers multiple resources for children on the autism spectrum. Library facilities are currently below the population-based performance standards. Through the year 2045, the City's future demand for library facilities includes an additional 8,138 square feet of public library space, as well as an additional 93,400 library books and 16 computers.

The City of Brawley should periodically review the facilities and personnel of the library system through the preparation of annual reports to identify staffing and budgetary concerns as City growth continues to increase the demand on library facilities and staff. Also, the City should continue to utilize General Fund revenue as the primary source for financing library services, review the allocation of General Fund finances in light of the State recommendation that local libraries receive 5% of local general fund resources, collect fees established in the DIF Study to meet the library facilities' demands for future development, apply for all possible library funding opportunities from the State, and accept donations of money and/or supplies as a means of augmenting library services while conserving allocated finances.

1.2.6 Parks and Recreation Facilities

The Department of Parks, Recreation, and Community Services is made up of four divisions: Parks, Recreation, Senior Citizens, and Grounds and Facility Maintenance. The City also provides local recreation programs and services for children, adults, and seniors at City facilities and in conjunction with the local school districts. Existing facilities include 3.78 acres of Mini-Parks, 42.54 acres of Neighborhood Parks, 110.75 acres of Community Parks, and six Community Center facilities totaling approximately 60,600 square feet.

Using the performance standard of 5 acres of parkland per 1,000 people, the city is currently not meeting the performance standard with a total of 4.49 acres per 1,000 people. The City will need to provide an additional 284.21 acres of parkland by 2045 to meet future demand. The City is planning to add an additional mini park and convert existing parkland into a T-ball field to provide additional programmed space to meet demand.

In addition to development impact fees, the City will encourage and, where appropriate, require

the inclusion of recreation facilities and open space within future residential, industrial, and commercial developments. The City will require the dedication of parkland, payment of an in lieu fee, or a combination of both as a condition of new residential development pursuant to the Quimby Act and will continue the use of assessment districts and Adopt-A-Park program to obtain and maintain parkland. Lastly, the City will continue to require all new subdivisions to fund the development and maintenance of parks through assessment districts and will continue to pursue joint-use opportunities with the Brawley School District and the Brawley Union High School District.

RLL features a hierarchy of parks and recreation facilities, comprising a large community park, six neighborhood parks, approximately 14 mini-parks, an executive 18-hole public golf course, and a private Homeowners Association (HOA) facility within the active adult community. The guidelines established by the Quimby Act require 3 acres of public open space per 1,000 residents, totaling approximately 33 acres for this proposed development acreage requirement is exceeded by the community and neighborhood public parks offered for public dedicated as proposed in the RLL SP.

1.2.7 Circulation Facilities

The City of Brawley owns and maintains local public streets within the City, and Imperial County owns and maintains local public roads in the unincorporated area. State Routes are owned and maintained by the State within both the City and unincorporated areas. The circulation system within the City is oriented in a north/south and east/west grid system.

The City's roadway types include Expressway, Prime Arterial, Minor Arterial, Collector, Local Collector, Residential, Industrial Collector, and Industrial Local roadways. The City's circulation facilities are generally found to operate at acceptable levels. Extension of roadways and creation of additional roadways will be needed as development occurs within the City limits and the SOI. As residential, commercial, and industrial development continue within the City boundaries and SOI, the City will need to continue to upgrade and improve existing roadways and create new roadways in order to maintain a service level that is in keeping with the goals established in the City's Circulation Plan.

The City of Brawley will continue to implement circulation system improvement projects included in the DIF Study as needed by projected future development within the City and maintain a level of service (LOS) C as a threshold standard to monitor the performance of community roadways. The City will require the preparation of a traffic analysis for major development proposals to identify potential impacts on the City circulation system and identify necessary physical improvements to maintain LOS C, both for new onsite streets as well as existing offsite streets that will be impacted by project traffic. As traffic volumes approach or exceed LOS C, the City will design improvements to increase the capacity restriping, restricting on-street parking, improving signal timing, widening intersections, and taking other appropriate measures. The City will also take actions to decrease the demand for vehicular transportation, such as promoting transit service, bicycle, pedestrian, and equestrian facilities.

The Rancho Los Lagos Circulation Plan was designed to align with the Land Use Plan, creating a cohesive network that prioritizes both vehicular and pedestrian safety and accessibility. This plan integrates narrow front setbacks, building orientations that engage with the street, and front porches to foster social interaction and passive surveillance. The Circulation Plan emphasizes walkable streets adorned with sidewalks, paseos, bicycle facilities, medians, and extensive landscaping, including street tree canopies, enhancing visual and physical

connections to parks and schools. It includes new collector roads like Schartz Road, Jameson Road and Western Avenue to alleviate traffic from SR 86 and extend southward, enhancing regional connectivity. This comprehensive design ensures efficient traffic management while promoting a pedestrian-oriented community conducive to recreation and social interaction. Potential amendments to the Imperial County General Plan may be necessary to ensure alignment with California State Law (Government Code §65454) and maintain consistency with the goals of the City's General Plan.

1.2.8 Wastewater Facilities

The City of Brawley plays a pivotal role in managing wastewater services, encompassing collection, treatment, and disposal for residential, commercial, and industrial users. Operated by the City Public Works Department, the wastewater collection system features approximately 77 miles of gravity sewer pipelines, with sections serving as combined sanitary and storm sewers. The system includes three sewage pump stations, 2.1 miles of forcemain, and a 5.9-Million Gallon Per Day (MGD) WWTP located in the northeastern part of the city. The City also manages a separate storm drain system comprising approximately 17 miles of pipelines and several detention basins to handle stormwater runoff.

In compliance with the California Regional Water Quality Control Board (RWQCB) Colorado River Basin Region 7 discharge requirements, the City's WWTP operates within capacity limits to ensure effective treatment. Future planning includes updating the 2026 Wastewater Master Plan to accommodate anticipated population growth, projecting average daily flows to increase from 2.70 MGD in 2024 to 3.62 MGD by 2045. This necessitates ongoing facility improvements and infrastructure expansions, such as lift station upgrades and sewer line replacements, as outlined in the Master Plan.

Adjacent to Brawley, Rancho Los Lagos (RLL) presents significant wastewater infrastructure challenges and opportunities. RLL, under development by Rancho Los Lagos, LLC, is slated to require extensive sewer infrastructure, including nearly 21 miles of gravity sewer lines, approximately two miles of forcemain, and multiple lift stations due to its flat terrain. Planned to accommodate phased development over several decades, RLL anticipates a build-out average daily flow of nearly 0.83 MGD, necessitating phased construction of a wastewater treatment plant (WWTP) capable of treating up to 1.0 MGD. This facility will be designed to meet stringent regulatory standards, including provisions for tertiary treatment to facilitate water reuse.

Funding for wastewater facilities at both the City and RLL hinges on revenue sources such as sewer service charges, capacity fees, and connection fees, augmented by grants, developer contributions, and potential state and federal funding opportunities like USDA loans and grants. The Imperial County Development Agreement outlines financial responsibilities, stipulating that developers contribute their fair share of costs related to infrastructure creation and implementation before project milestones.

The Rio Vista Brawley Apartments project will connect to the City of Brawley's existing wastewater system and includes the construction of an on-site sewer lift station to facilitate service to the site as determined by the City of Brawley. The lift station is necessary due to site topography and will ensure adequate conveyance of wastewater to the City's existing sewer infrastructure. The development includes 144 multi-family residential units and is designed with internal infrastructure improvements to manage wastewater flows consistent with City standards. No major off-site sewer main extensions are required. The proposed lift station and related improvements support the City's ongoing efforts to expand service

capacity in a phased and coordinated manner within its sphere of influence.

To ensure wastewater service adequacy and regulatory compliance, ongoing system enhancements, financial planning, and adherence to development impact fee assessments are critical. Both entities are committed to periodic review and adjustment of funding strategies and infrastructure plans to sustain effective wastewater management amid population growth and infrastructure demands.

1.2.9 Water Facilities

The City of Brawley oversees a comprehensive water system critical for treating and distributing potable water to approximately 5,900 service connections. This infrastructure includes two raw water storage reservoirs, a 15 MGD capacity Water Treatment Plant (WTP), two clearwell storage tanks, a distribution water pump station at the WTP, and a treated water storage tank with a booster pump station near the Airport. Operating within a single pressure zone, the city ensures reliable water service to its residents and businesses.

Water supply originates from the Colorado River via the Imperial Irrigation District (IID) and is conveyed through the Mansfield Canal, which has a capacity of 19 MGD. To safeguard against power disruptions, the WTP is equipped with a 1,000 kW diesel generator, capable of sustaining operations for up to 60 days. Currently, the city maintains substantial storage reserves, including 40 MG for raw water and 6 MG for treated water located at the WTP.

Distribution of treated water is facilitated through a network of pumps, including five 4,000 gpm pumps at the WTP and three 1,600 gpm booster pump stations connected to the Airport tank.

The city has equipped all residential customers with water meters and plans to extend metering to all business and commercial customers. Future initiatives include mandating water meters for new constructions and potentially for existing services, alongside implementing projects outlined in the updated Water Master Plan and Development Impact Fee (DIF) Study as funding becomes available.

Rancho Los Lagos (RLL), a key development area, is projected to have a buildout average day demand of approximately 1.55 MGD. This area will be served by a closed water system, relying solely on pumping due to its flat topography. The Water Supply Assessment (WSA) for RLL indicates that current land use for agriculture, which has a higher water demand, will decrease by 35% once development is complete. The development includes phased construction, starting with a 2.0 MG storage tank and a 4,700 gpm booster pump station, connected to the City's distribution system through proposed points of connection (POCs) on Western Avenue and Dogwood Road.

The city is planning opportunities for shared facilities, such as the proposed 12-inch diameter waterline along Schartz Road, potentially benefitting RLL. To support RLL, developers will fund infrastructure improvements and contribute to raw storage basins, ensuring efficient use of the City's surface water treatment plant facilities. All system improvements, whether by the city or developers, must comply with federal, state, and local regulations.

To enhance water conservation, the City promotes low-flow fixtures in new developments and considers retrofitting existing facilities. Additionally, the City will continue reviewing its water rate and financing structure to ensure sufficient funding for future projects and maintenance, while enforcing stringent policies to protect water quality. The City's

commitment to water conservation and sustainable development is reflected in these ongoing efforts and future planning initiatives.

This page intentionally left blank.

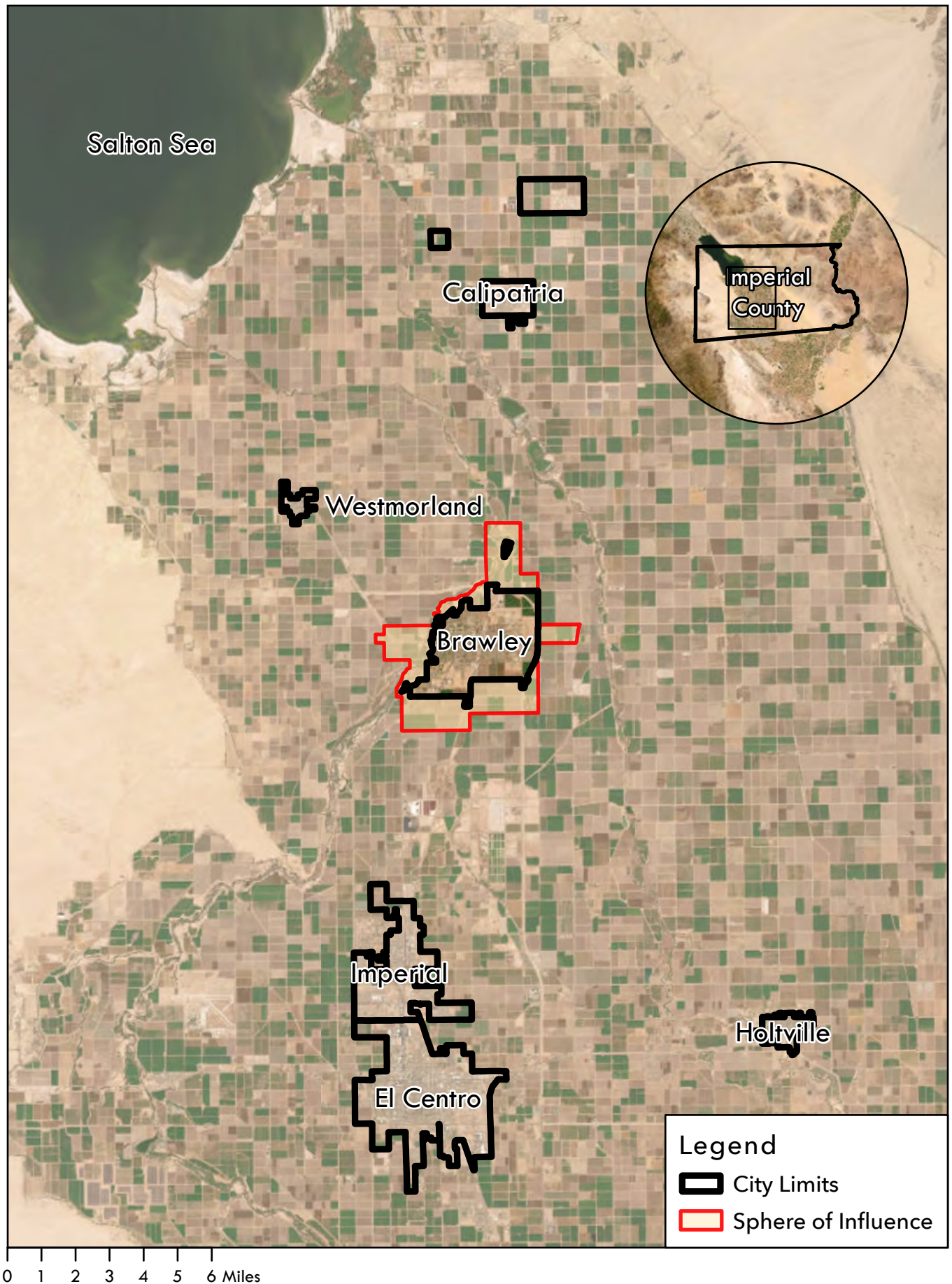


Figure 4-1
Regional Location

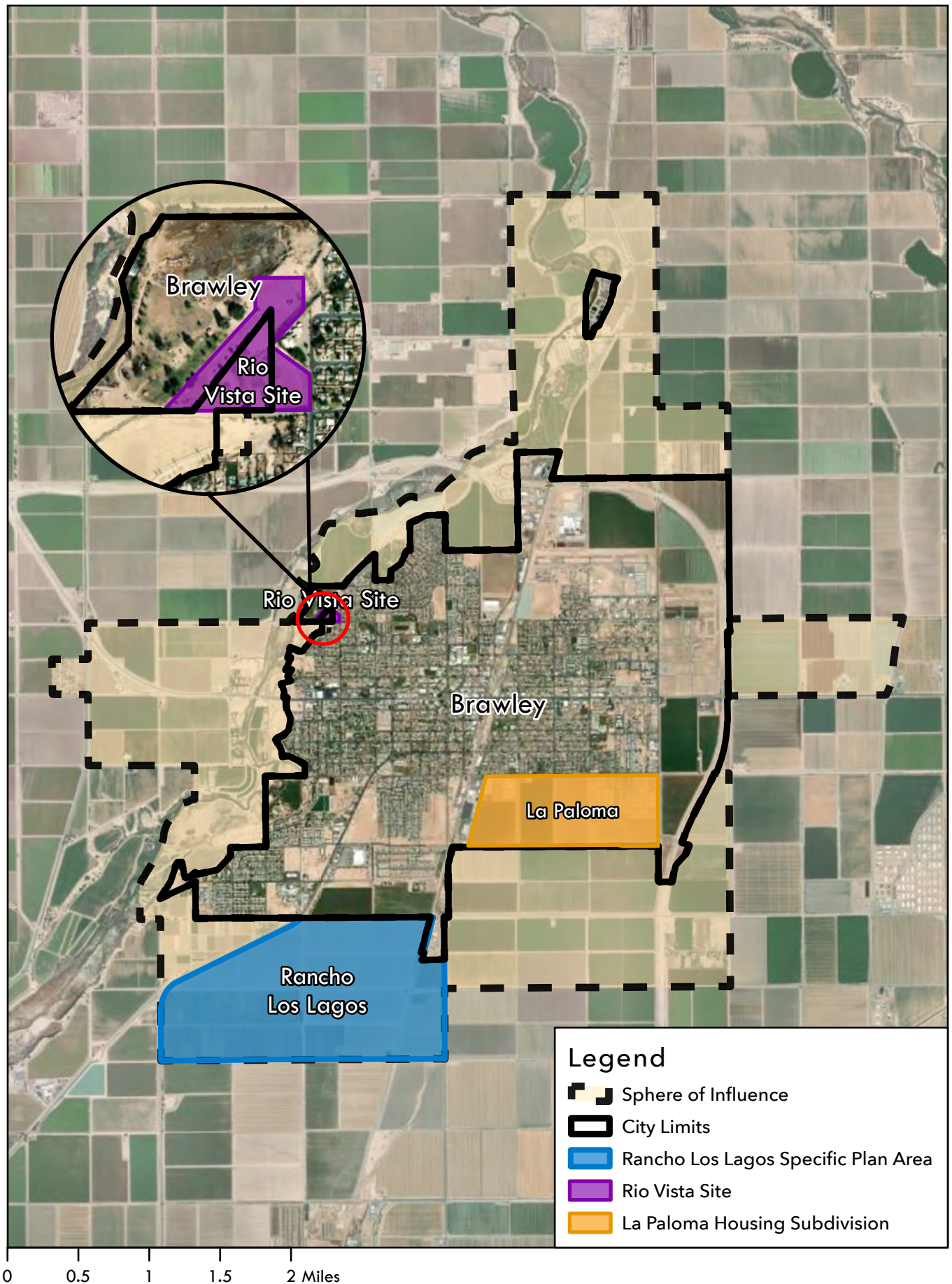


Figure 4-2
City Limits and Sphere of Influence

2.0 INTRODUCTION

2.1 **BACKGROUND ON THE CITY OF BRAWLEY**

The City of Brawley is located in the County of Imperial, California, approximately 13 miles north of Interstate (I-) 8 and the City of El Centro. Regional access to Brawley is provided by State Route (SR-) 86 and SR-111, which extend north from I-8 and pass through the City to connect with I-10 near the City of Coachella in Riverside County. SR-78 is Main Street within the City and extends from San Diego County to connect with I-10 near the City of Blythe in eastern Riverside County. The City and its Sphere of Influence (SOI) are not adjacent to any other cities or areas of urban development, and the nearest such communities are the cities of Westmorland approximately 6 miles to the northwest, Imperial approximately 6 miles to the south, and Calipatria approximately 8 miles to the north. There are residential, commercial, and industrial land uses in the City, as well as public services such as schools, parks, and City facilities. The current City and SOI boundaries, depicted on Figure 4-2: City Limits and Sphere of Influence, consist of approximately 5,189 and 6,149 acres, respectively, for a combined total of approximately 11,338 acres.

The City provides an array of services including flood control, fire protection, emergency medical care, law enforcement, library services, recreation and parks, maintenance of local roadways, wastewater collection, treatment and disposal, water treatment and distribution, and all City Hall services within the incorporated limits. These services will be provided to areas within the SOI after they are annexed. The City already provides water and wastewater treatment to some areas in the SOI.

The City's General Plan provides a structure for development and planning within the City and the City's SOI. To guide planning within the area, the Land Use Element includes ten major land use designations: Agriculture, Rural Residential, Low-Density Residential, Medium-Density Residential, Commercial, Light Industrial/Business Park, Industrial, Public Facilities, Open Space, and Special Study Areas. Master planning for City services is an ongoing process and is intended to define facilities required to serve ultimate future development in accordance with the City's current General Plan. This Service Area Plan (SAP) is based on the recommended facilities and cost estimates from the water master plan and wastewater master plans.

2.2 **PURPOSE OF THE SERVICE AREA PLAN**

This SAP has been prepared for the City in accordance with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, which requires that such a plan identifying the existing and projected demand for public facilities and services be prepared by all incorporated cities and special districts within the State. The 2000 legislation is specifically implemented by the Imperial County Local Agency Formation Commission (LAFCO), whose policy states that a SAP must be implemented by a city within its jurisdiction prior to any formal annexation of land into that city's boundaries.

The City witnessed a substantial increase in land development activity between 2000 and 2010. Following the 2008 recession, that growth slowed and the City shifted its focus towards economic recovery and stabilization. In recent years, new opportunities have emerged, particularly with the Lithium Valley Specific Plan, which could introduce a major influx of residents and jobs in Imperial County.

This plan is aimed at leveraging the region's rich lithium resources to create a hub for lithium extraction and processing, critical for battery production and renewable energy technologies. The Programmatic Environmental Impact Report (PEIR) for the Lithium Valley Specific Plan evaluates the potential environmental impacts of the proposed development and outlines mitigation measures to address these impacts, ensuring sustainable growth. The Rancho Los Lagos development could help accommodate the emerging workforce, providing necessary housing and amenities to support this expansion. In response to these new developments, the City has initiated studies and programs to plan for infrastructure and service improvements necessary to accommodate new growth. These studies and programs are described below.

Development Impact Fee Justification Study

A Development Impact Fee Justification Study (DIF Study; David Taussig & Associates 2010) was prepared to enable the City to update its development impact fees and ensure that all new development pays its "fair share" of the cost of new facilities required to meet the increased demand for such facilities. The study ensures that the increased development impact fees comply with the requirements of Assembly Bill (AB) 1600 (Government Code Section 66000 et seq.) that there be a nexus between the amount of the fee and the public facility impact of the developments on which the fees are imposed. The DIF Study is dated September 20, 2010. The City plans to update the DIF study in FY 2025/2026.

Fiscal Impact Studies

The recent land development proposals received by the City have generally involved larger developments, including specific plans for annexation of previously unincorporated property that represent substantial population growth and demands for increased City, as well as County, services. In response, the City requires Fiscal Impact Studies to determine whether revenue from an increase in property tax and other sources would offset the cost to the City and County of providing an increased level of public services.

Community Facilities Districts

In partial compensation for the increased cost of providing services and in accordance with the Mello-Roos Community Facilities Act of 1982, the City has required the formation of a Community Facilities District (CFD) for larger new developments in order to cover the annual cost of increased City services. This has included the costs for maintenance of parks, pathways, and open space; for increased police and fire protection services; and for other services unique to the property within the CFD. These costs are a special tax on developed property that is assessed on a per-dwelling-unit or per-acre basis for both residential and non-residential developed properties, and they are collected annually. Typically, the CFDs enable a 2% per year increase in the maximum special tax.

Public Facility Master Plans

The Public Facility Master Plan(s) will be updated as needed and are dependent upon the amount of new development approved and not upon the adoption of a new Development Impact Fee Study and/or impact fees.

2.3 ORGANIZATION AND USE OF THE SERVICE AREA PLAN

The City of Brawley Service Area Plan will play a crucial role in evaluating the feasibility of annexing Rancho Los Lagos (RLL) into the city's jurisdiction through the Imperial Local Agency Formation Commission (LAFCO) process. This plan comprehensively outlines the city's current public services and facilities, forecasts anticipated future demands, and details strategies for developing and extending essential services to meet these demands. It utilizes a 20-year planning horizon, projecting growth and service needs until 2040 based on population estimates from sources such as the DIF Study and the City's General Plan. By aligning with state-mandated population projections provided by the California Department of Finance, the Service Area Plan ensures that annexation considerations for RLL are grounded in accurate data and comprehensive planning, reflecting the city's commitment to effectively providing services to all potential annexed areas.

Additionally, the Service Area Plan (SAP) outlines the City's existing public services and facilities, estimating current and future demand for these resources, and articulating strategies for their development and extension to meet projected needs. This planning document is crucial for demonstrating the City's readiness to provide adequate services up to the Sphere of Influence (SOI) boundaries at the time of annexation. Population projections from 2020 to 2040, derived from housing and population studies like the DIF Study by David Taussig and Associates and the City's General Plan, inform these forecasts. Despite the 2020 Census serving as a baseline, city staff reports suggest a more accurate current population estimate of 35,000 residents.

Population projections are based on average growth rates provided by the California Department of Finance, specifically the E-1 Population Estimates for Cities, Counties, and the State, published annually with updates in May 2023. These projections underpin the planning horizon for service expansion and development, ensuring alignment with state guidelines and accurate anticipation of future community needs.

This page intentionally left blank.

This document is organized into the following five chapters that satisfy the requirements set forth in the LAFCO guidelines.

Chapter 1.0 EXECUTIVE SUMMARY: Provides a brief summary of the SAP, highlighting key information regarding demand and financing.

Chapter 2.0 INTRODUCTION: Outlines the purpose and intent of the SAP and presents the layout of the SAP to help the reader use the document. This chapter describes the background of the City and the planning documents that enabled the preparation of the SAP.

Chapter 3.0 GROWTH PROJECTIONS: Provides general information about projected population, current and future land use trends in the City and the City's projected SOI, and the implications of these trends for the development of City services and facilities.

Chapter 4.0 FACILITIES AND SERVICES: Details the current and planned facilities and services, their current and projected adequacy, measures to ensure adequacy, and how such measures will be achieved and financed. An analysis of the following facilities and services follow:

- Administration
- Flood Control/Drainage
- Fire
- Law Enforcement
- Library
- Parks and Recreation
- Circulation
- Wastewater
- Water

Analysis for each public service and facilities area in the SAP is based on the standards developed by LAFCO. Each subchapter of Chapter 4 contains the following sections:

- **Performance Standard:** A description of any standards or goals that have been adopted by the City to review the adequacy of services within existing and future timeframes.
- **Facility Planning and Adequacy Analysis:** An inventory of the existing facilities, the adequacy of the facilities when compared to existing demands, the anticipated demand for facilities pursuant to growth of the City, and the phasing of the demand for facilities.
- **Financing:** An explanation and identification of how services and facilities are currently being funded and how future services and facilities may be funded.
- **Recommendation:** A series of recommendations to ensure that adequate facilities will be provided and that proper levels of service will be maintained.

Chapter 5.0 FINANCING: Identifies all of the potential funding mechanisms for public services and facilities provision that are available to the City.

This page left intentionally blank.

3.0 GROWTH AND PHASING PROJECTIONS

3.1 EXISTING LAND USE

The City includes a variety of residential, commercial, and industrial land uses, as well as public services such as schools, parks, and City facilities. Vacant land designated for residential use primarily exists in the southwestern part of the City, with smaller areas designated for residential use in the north.

The City’s SOI boundary consists of approximately 6,149 acres outside the existing boundaries of the City. The SOI boundary is depicted on Figure 4-2 and is generally defined as follows:

- On the north by West Baughman Road
- On the west by Kalin Road
- On the south by Schwartz Road
- On the east

Uses outside the City limits are primarily farmland or vacant land. Occasional commercial uses such as farm equipment and services, and farm residences also occur within the SOI. Agricultural operations include field crops such as alfalfa, bermudagrass, and sudangrass; vegetable and melon crops such as lettuce, carrots, onions, and broccoli; and grazing land. Other land uses in the existing SOI include a golf course (Del Rio Country Club) and the City’s wastewater treatment plant; both are located north of the City near SR-111. A small residential area, known as the Poe Colonia near SR-78/86 at Cady Road, is located west of the City.¹

3.2 PLANNED LAND USE

Planned land uses in the City are governed by the provisions of the City of Brawley Zoning Ordinance and are guided by the land use plan, and the goals and policies presented in the City’s General Plan. By implementing the land use plan and the goals and policies of the General Plan Land Use Element, the City dictates what type of land uses are allowed throughout specific areas within its boundaries. The General Plan Land Use Element lists the following land use designations: Agriculture, Rural Residential, Low-Density Residential, Medium-Density Residential, Commercial, Light Industrial/Business Park, Industrial, Public Facilities, Open Space, and Special Study Areas. Land use designations within the City and proposed SOI boundaries per the City’s General Plan are shown in Figure 4-3: General Plan Land Use.

Through the implementation of the General Plan and the application of the land use designations, the City is able to foresee where and to what extent growth would occur within its boundaries and the proposed SOI boundaries. Generally speaking, the City’s land use policy encourages infill development within the boundaries of existing developed areas and/or vacant lands instead of new development of agricultural lands in order to best utilize existing facilities and services.

¹ A *colonia* is defined by State and Federal housing guidelines as a residential area within 150 miles of the U.S./Mexico border that has a concentration of low-income households and lacks a permanent potable water supply and sewage system. The State provides block grant funds to assist local communities in providing public services to colonias. Accordingly, the City has extended sewer and water lines to serve the Poe Colonia.

This SAP anticipates that future growth and the increased demand for public services will occur almost entirely within the area designated for urban land uses depicted on Figure 4-3. Much of the City's proposed SOI is designated Agricultural in the Brawley General Plan, but a variety of other land use designations are also found in the proposed SOI including the following: Low Density Residential, Medium Density Residential, Public Facilities, Commercial, Open Space, Industrial, and Light Industrial. It is assumed that all of the land within the City's proposed SOI will one day be annexed into the City proper. The General Plan does not provide a specific schedule for the annexation of land to the City.

Eight special study areas, as shown in Figure 4-3, are also identified in the General Plan: (1) Luckey Ranch (adopted 2000), (2) Rancho-Porter (adopted 2010), (3) Villages of Sonata, (4) La Paloma (adopted 2004), (5) East Village District III (adopted 2012), (6) Civic Center District I (adopted 2012), (7) West Village District II (adopted 2012), and (8) Gateway (adopted 2004). The City will consider or has completed the preparation of Specific Plans for these areas to ensure appropriate development in these areas. Special study areas within the City may include City-approved master planned developments, known as Approved Specific Plans; areas that include proposed large-scale master planned developments that have not been approved, known as Proposed Specific Plans; and areas that are intended to promote a mixture of commercial and residential uses in central Brawley, known as the Downtown Overlay Districts. Please refer to the City of Brawley General Plan Land Use Element LUE-1 Land Use Map (2008) for further information.

The Rancho Los Lagos development initially planned in 1992 centered around a 200-acre championship golf course, surrounded by a mix of single-family homes, multi-family residences, commercial spaces, schools, parks, and open areas. However, due to market conditions in the early to mid-1990s, this plan was never entitled or implemented.

In 2005, the ownership group decided to revisit the development plans in response to significant changes. These changes included shifts in the residential housing market towards varying lot sizes and types, an evolving commercial market, and an emerging demand for retirement communities with diverse recreational amenities. Additionally, the pace of development in Imperial County had increased, encompassing both traditional subdivisions and master-planned communities.

Since 1992, new community planning philosophies emphasizing pedestrian and bicycle access and circulation have emerged. These concepts aim to enhance community identity by integrating public spaces such as trails, parks, schools, and local-serving commercial areas into a connected network, accommodating both vehicular needs and safer mobility options.

In 2024, the Rancho Los Lagos Specific Plan was redrafted and prepared, reflecting updated goals and planning approaches to align with current market demands and community planning principles. Concurrently, the Lithium Valley Specific Plan has emerged, capitalizing on the region's lithium resources to attract new industries and a growing workforce to Imperial County. This plan aims to foster sustainable growth, leveraging opportunities in battery production and renewable energy technologies. The influx of residents and jobs expected from these developments underscores the need for comprehensive planning that includes infrastructure improvements and community amenities to support the expanding population and economic base.

The future population projections for Brawley include the anticipated population growth from developments like Rancho Los Lagos, highlighting the need for infrastructure and community amenities to support the expanding population and economic activities.

The Rio Vista Brawley Apartments Annexation encompasses approximately 4.28 acres located within the City of Brawley's sphere of influence. The project site, identified as Assessor Parcel Number (APN) 046-050-016, is currently under Imperial County jurisdiction but is entirely surrounded by land within the City limits. The annexation would eliminate an unincorporated "island" and correct jurisdictional boundary discrepancies where property lines are bisected by the existing City-County boundary.

The proposed development includes a market-rate apartment complex consisting of five apartment buildings, offering a total of 144 dwelling units. Unit types include both one-bedroom and two-bedroom configurations. The site is designed with shared amenities for residents, including a 4,400-square-foot clubhouse, a pool, and three landscaped grass areas. The proposed density is approximately 18 dwelling units per acre, consistent with the City's R-3 (High Density Residential) zoning designation.

The site is currently zoned R-E (Residential Estate) under County jurisdiction. Upon annexation, the property would be pre-zoned R-3 to accommodate the proposed multi-family residential use. The R-3 zone permits a maximum lot coverage of 65%, a maximum height of 35 feet, and a maximum density of one unit per 2,500 square feet. All proposed development standards are consistent with the City's zoning regulations.

To support the proposed development, the site plan includes provisions for connection to City sewer infrastructure, which will accommodate the anticipated wastewater service demand. No additional infrastructure extension beyond adjacent city services is anticipated.

This annexation supports the City's broader goals for infill development and efficient provision of municipal services. It also facilitates the logical extension of urban infrastructure and eliminates service delivery inefficiencies caused by the existing unincorporated enclave. The project represents a continuation of the City's efforts to accommodate housing demand and enhance land use consistency within its planning area.

LEGEND

- Project Boundary
- Railroad
- Lake/Canal
- Potential Restaurant Site
- High Density Residential
- Medium Density Residential
- Low Density Residential
- Commercial
- Elementary School
- Business Park
- H.O.A. Facility/Parks
- Potential School Location
- Limited Curb Cuts Area



Gross acreage indicated includes local streets.

Source: P&D Consultants in conjunction with EDAW, 2007, 2008, 2009

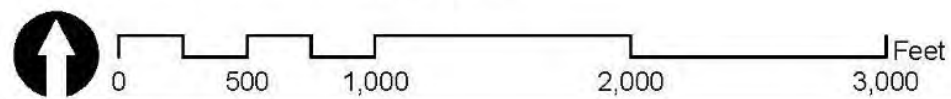


Figure 2-1
Specific Plan Map

Rancho Los Lagos

County of Imperial

3.3 BUILDOUT PROJECTIONS

Based on reports from City staff, the population of the City of Brawley and its Sphere of Influence (SOI) is projected to grow significantly over the 20-year planning period, potentially reaching 47,022 residents by 2045. As of 2024, the city reports a population of approximately 35,000 residents. This anticipated growth of 12,022 new residents within the city limits and SOI reflects ongoing development and economic trends in the region.

In the absence of other recent publications providing updated population projections, this Strategic Action Plan (SAP) has analyzed future demands for city services based on the projected population figures discussed above, as included in the Development Impact Fee (DIF) Study. This analysis serves as a foundational basis for planning infrastructure and service provision to accommodate the expected population increase by 2045. The SAP is designed to be periodically updated, allowing flexibility to adjust population projections as new data becomes available.

Several factors contribute to the projected growth, including the national economy, local employment opportunities, natural population increase, public policies, and environmental factors. Economic conditions and employment opportunities are particularly influential, shaping the rate and scale of population growth in the city and its surrounding areas. Additionally, future regional growth may be influenced by opportunities stemming from enhancements to the North American Free Trade Agreement (NAFTA) among the U.S., Mexico, and Canada, as well as the construction of new Mexico/U.S. border crossings, which could further stimulate economic activity and population expansion.

Population projections for Rancho Los Lagos were developed through a systematic process that involved analyzing the latest tentative tract maps and associated land uses. Each land use category was assigned appropriate densities based on reports from staff. This data-driven approach ensured that the population projections for Rancho Los Lagos were grounded in empirical analysis, providing a robust basis for future planning and development decisions aligned with community needs and growth expectations.

Population projections for Rancho Los Lagos account for two residential development alternatives. The first option entails developing a gated, active adult residential community designed for residents aged 55 years and older, featuring both detached and attached single-family homes tailored to meet their specific preferences. Projections for this scenario consider factors like household sizes, occupancy rates, and demographic trends within this age group.

Alternatively, if market conditions or other factors preclude the active adult community, the second alternative would be a gated, conventional residential neighborhood without age restrictions. This option would attract a diverse demographic including families, young professionals, and retirees seeking a mixed-age community. Projections for this neighborhood encompass a wider range of demographic factors, influencing infrastructure and community service planning accordingly. These population projections play a crucial role in guiding the community's future development aligned with anticipated growth patterns and resident preferences.

The approximately 66-acre project site is located in the southern portion of the City of Brawley, in south-central Imperial County, California. The site is situated approximately 9 miles southwest of the City of Imperial and 13 miles southwest of the City of El Centro, with the United States/Mexico border located approximately 22 miles to the south. Regional access to the area is provided via Interstate 8, located about 14 miles to the south.

The proposed project involves subdividing the western portion of the site into 12 commercial lots for future development, with primary access planned from Brawley Avenue/SR-86 to the west and (future) Legion Road to the north. The eastern portion of the site, approximately 29 acres, will be subdivided to allow for the development of 408 multifamily residential units with varying floor

plans. The residential development will include an estimated 836 parking spaces, consisting of two-car garages and surface parking stalls. The residential area will be designed with a range of community amenities, including a dog park, clubhouse, pool, fire pit, as well as several community parks and green spaces for resident use.

In terms of infrastructure, the project will include upgrades to the existing utilities and services to meet the needs of the projected population, including water, sewer, and electricity systems. A comprehensive traffic study will also be conducted to evaluate the impacts of the project on local traffic patterns and transportation infrastructure. The development is designed to integrate well with surrounding areas and is expected to have a positive economic impact on Brawley, including job creation and increased tax revenue.

Combining the planned RLL buildout scenario of a gated, active adult residential community with 9,820 residents, the planned YK America buildout scenario of 1,416, and the future population projection of 47,022 residents, the projected population for Brawley would be 58,758 residents.

Table 3.3-1 Brawley Buildout Projections

Buildout Scenarios	Population
Existing Population	35,000
2045 Population	47,022
RLL Population²	9,820
YK America Population³	1,116
Rio Vista Brawley Apartments	500
Future 2045 Population + RLL	58,758

2 Assuming development of a gated, active adult residential community.

Table 3.3-2 Rancho Los Lagos Buildout Projections

Land Use	Total Acres	Dwelling Units	Population	Alternative Population
Low Density Residential	183	836	2,859	2,859
Active Adult or Gated Community Residential	124	746	1,118	2,550 ³
Medium Density Residential	102	723	2,471	2,471
Multi-Family	43	692	2,202	2,202
Cluster	26	243	832	832
Assisted Living	9	226	338	338
Grand Total	486	3,465	9,820	11,252

³ Assuming development of a gated, conventional (non-age restricted) residential neighborhood.

Table 3.3-3 YK America Buildout Projections

Land Use	Total Acres	Residential Density	Dwelling Units	Population
Low Density Residential	28.77	14.2 DU/AC	408	1,416

³ Unit sizes are estimated and subject to change based on more accurate building design.

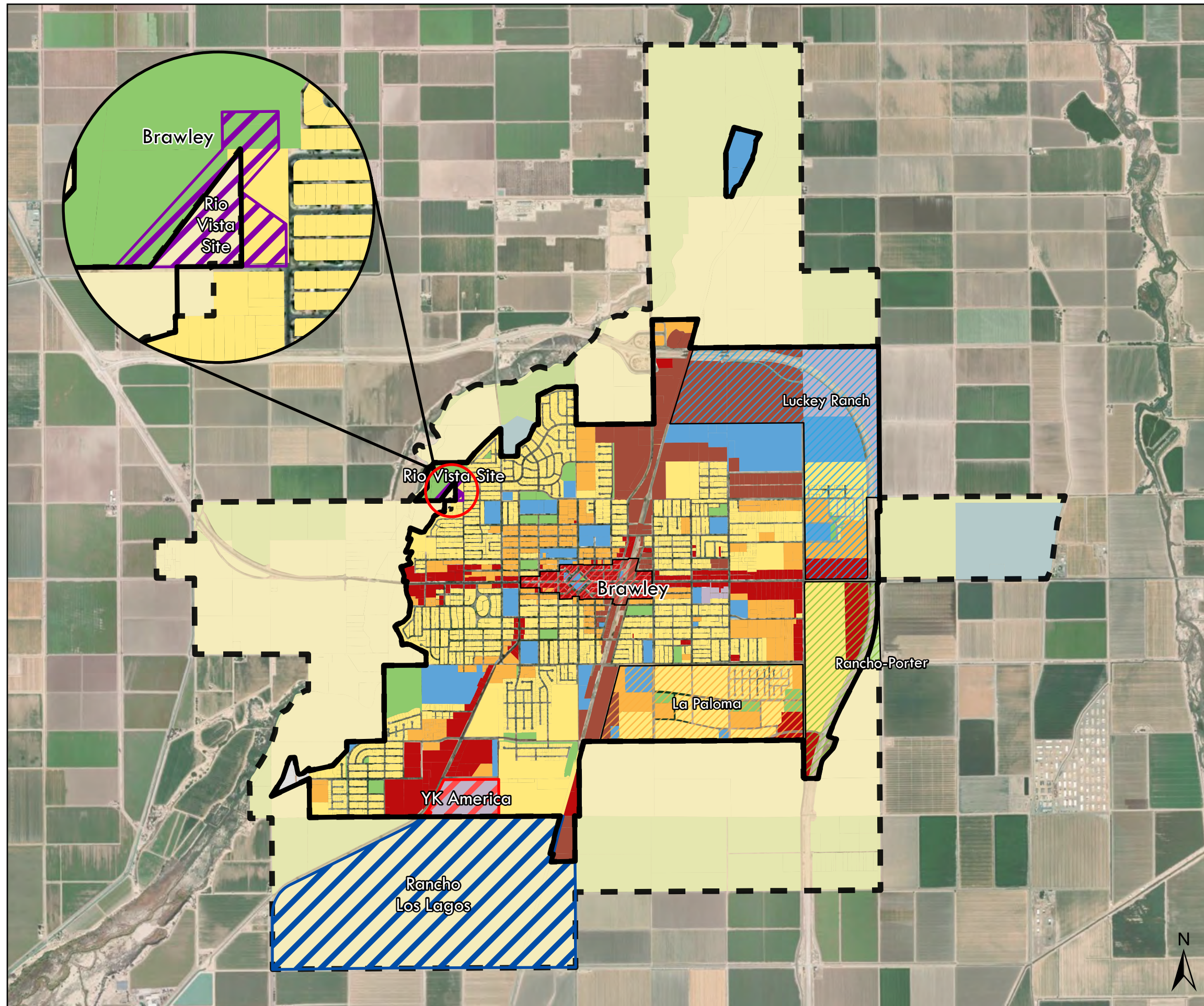
4 Based on average household size of 3.47, according to the 2023 5-year ACS Community Survey.



Figure 4-3
General Plan Land Use

Legend

- City Limits
- Sphere of Influence
- General Plan Land Use Categories**
- Agriculture
- Commercial
- Industrial
- Light Industrial/Business Park
- Low Density Residential
- Medium Density Residential
- Open Space
- Public Facilities
- Rural Residential
- Unincorporated
- Approved Specific Plans**
- Downtown
- La Paloma
- Lucky Ranch
- Rancho-Porter
- Proposed Plans**
- Rancho Los Lagos Specific Plan Area
- YK America Mixed Use Master Plan Area
- Rio Vista Site



This page intentionally left blank.

4.0 PUBLIC FACILITIES AND SERVICES

The following sections provide a detailed account of the various public services and facilities that are developed, maintained, and operated by the City. The sections cover facilities and services for the City's administration, flood control/drainage, fire, law enforcement, library, parks and recreation, circulation, wastewater and water. For each of these facilities areas, an inventory of existing facilities is given and performance standards are identified (where applicable) to gauge the effectiveness and adequacy of the existing facilities.

Demands for future facilities are discussed relative to the projected growth outlined in Chapter 3, "Growth and Phasing Projections," above. Where applicable, plans for future facilities are discussed. Discussion is presented regarding the current funding methods for each facility's area and the prospective sources of funding that could be used in the future. Finally, recommendations are presented that would aid the City in ensuring future adequacy and efficiency.

This page intentionally left blank.

4.1 ADMINISTRATIVE FACILITIES

A majority of the City's administrative facilities are centrally located in the City Hall Complex.

4.1.1 Performance Standards

The City of Brawley has adopted the performance standard for providing administrative personnel is a range of 0.75 to 1.0 full-time equivalent staff member per 1,000 residents.

In addition, the performance standard for administrative facilities is a range of 400 to 500 square feet per 1,000 residents.

4.1.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities

The City Administration Building includes office space for the City Manager, City Clerk, and Personnel & Risk Management. The City Administration Building also houses the City's Council Chambers. The City Hall complex includes the Development Services Department, Finance Department, and Main Branch Library building. The City Hall Complex also provides space for public access counters (such as for building permits, payment of fees and taxes, etc.).

Council Chambers employs five full-time staff members; one City Manager, one Assistant to the City Manager, two Human Resource/Risk Management staff and one Office Technician. The City Hall Complex houses nine finance staff and the Police Station houses one full-time Information Technology staff and one part-time staff. The city currently does not employ a City Records Clerk and Records Administrator. Administrative personnel are supplemented periodically as needed by contract personnel. Administrative personnel are responsible for public meeting agenda preparation, grant coordination, planning, building, public works, finance, and public safety functions.

Table 4.1-1 shows a summary of the existing administrative facilities.

Table 4.1-1 Existing Administrative Facilities

Administrative Facility	Location	Size (square feet)
Council Chamber	383 Main Street	4,000
Finance Department	400 Main Street	7,364

Adequacy of Existing Facilities

With a population of 35,000, the calculations below show how many square feet of each type of administrative building there is per 1,000 residents.

Council Chamber

4,000 sq ft/ 35,000 residents X 1,000 residents = 114 square feet per 1,000 residents

Finance Department

$7,364 \text{ sq ft} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 210.4 \text{ square feet per } 1,000 \text{ residents}$

With the desired performance standard of 400 to 500 square feet per 1,000 residents for administrative facilities, the city is currently not meeting the performance standard with a total of 324.4 square feet per 1,000 residents. The city needs an additional 75.6 square feet per 1,000 residents to meet this standard.

The Council Chambers is part of the City's main administration facility and fills most of the approximate 4,000 sq ft building. This leaves little office space for daily operation administrative staff. The Council Chambers can become crowded for public meetings, leaving some attendees standing outside in the hallway during meetings. The Council Chambers were remodeled from a County Court 25 years ago, becoming too small for a courthouse. The outdated design lacks efficiency for current operational needs. The Council Chambers and City Hall Complex are located across the street and the City's Information Systems staff are housed within the City Police Department. This creates challenges with having the city's administrative staff in three different buildings.

With 16 total full-time administrative staff and a population of 35,000 residents, the City's Administration is currently staffed at a rate of 0.46 full-time administrative staff per 1,000 residents. This was calculated using the following formula:

$16 \text{ full-time staff} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 0.46 \text{ full-time staff per } 1,000 \text{ residents}$

With the desired performance standard of between 0.75 to 1.0 full-time equivalent staff member per 1,000 residents, the City will need to employ an additional 10 full-time staff members to achieve this performance standard.

Future Demand for Facilities

The city will require additional staff and facilities to meet the performance standards and provide adequate services to the city as the population increases through internal growth and annexation of the City's SOI. With a projected population of 58,758 residents by 2045, future demand for facilities is calculated below:

$22,737 \text{ sq ft} / 58,758 \text{ residents} \times 1000 \text{ residents} = 387 \text{ square feet per } 1000 \text{ residents}$

The DIF Study identified the need for a City Hall Expansion (2,500 square feet) and a Public Works/Engineering Building (20,000 square feet) to serve existing and future development through 2030. The updated DIF study would be utilized in order to fund future expansions of administrative facilities. While the City is currently meeting the performance standards for future administrative facilities, consideration for how each building is used to house staff office space.

Using the performance standard of 0.75 full-time administrative staff, future needs for administrative staff are calculated below:

$0.75 \text{ full-time staff} / 1,000 \text{ residents} \times 58,758 \text{ residents} = 44 \text{ full-time staff}$

The City of Brawley will need to hire an additional 28 full-time administrative staff to meet the City's needs by 2045.

Opportunities for Shared Facilities

Creating a centrally located area to house various administrative facilities will allow for a more efficient operation of administrative services.

Phasing

There is no plan for phasing currently. Future plans to complete a 2,500 square foot expansion of the City Hall Complex and the Public Works/Engineering Building have been put on hold due to lack of available funding.

4.1.3 Funding

Current Funding

Sources for administrative facilities and services include development impact fees, grants (Federal and State funding such as CDBG (State), and Other Public Safety Grants), and general fund monies (tax revenue, fees, permits, reimbursements, grants). The City also receives funding from seven Community Facility Districts (CFDs).

The first priority is to utilize grants, when available, and development impact fees. General fund monies, such as property taxes, sales taxes, business license fees, utility taxes, and transient occupancy taxes, may be used as a second priority to development impact fees and grants. The City's General Fund is funded through property taxes, sales taxes, business license fees, utility taxes, and transient occupancy taxes, and these sources are used to fund administrative facilities and services, including Administration, Public Safety, and Recreation programs. The City updated the Utility User's Tax ordinance in 2022, removing the sunset clause with voter approval and expanding the tax to include modern telecommunication services like Zoom, Boomerang, and streaming platforms.

The City also received funding through the American Rescue Plan Act funds to improve City's facilities. Additionally, the City of Brawley receives maintenance and operation funding from the General Fund, development impact fees, grants, and Community Facility Districts (CFDs). The General Fund includes revenue from taxes, fees, permits, reimbursements, and grants, while development impact fees cover various areas such as Administration, Fire, Police, Transportation, Parks, Library, Water, and Wastewater. The City also benefits from Federal and State grants and has been utilizing American Rescue Plan Act funds to enhance its facilities. Currently, the City relies on these sources and is planning to pursue an additional half-cent transactional sales tax to increase general fund revenue and support city services. Although the City has budgeted for an updated Development Impact Fee Study, the process has not yet started.

Cost Avoidance Opportunities

Creating a single, centrally located area to house various administrative facilities may help avoid any duplicative costs currently incurred because of the administrative facilities being located in more than one location.

Future Funding Sources/Recommended Funding

The City will continue to collect fees stipulated in the DIF Study and other sources of revenue for administrative facilities and services, including general taxes. The City is planning to pursue an additional half-cent transactional sales tax to increase general fund revenue to support city services. While the City has not identified additional funding sources or cost-saving opportunities, it continues to rely on grant funding and the American Rescue Plan Act funds to improve its facilities.

4.1.4 Recommendations

In order for the City to provide its residents with adequate administrative services and to assure that future demands for facilities are properly identified and addressed, the City will implement the following measures.

- Continue to periodically review the administrative facilities of the City through the preparation of annual reports. Such reviews will identify staffing and budgetary concerns as City growth continues to increase the demand for facilities and staff.
- Ensure that future funding includes grants, development impact fees, and general fund monies to support the expansion and improvement of administrative facilities.
- Consider consolidating administrative offices into a single, centrally located area to enhance operational efficiency and avoid duplicative costs.
- Pursue an additional half-cent transactional sales tax to bolster the general fund revenue and support city services.
- Plan for the hiring of an additional 28 full-time administrative staff by 2045 to meet the desired performance standard of 0.75 full-time equivalent staff per 1,000 residents, addressing the anticipated increase in population to 58,758 residents.
- Plan for the expansion of the City Hall Complex by 2,500 square feet and the construction of a new 20,000 square foot Public Works/Engineering Building to accommodate future growth and meet performance standards.
- Leverage funding from Community Facility Districts (CFDs)
- Prioritize the use of grants and development impact fees for funding administrative facilities and services, using general fund monies as a secondary source when necessary.

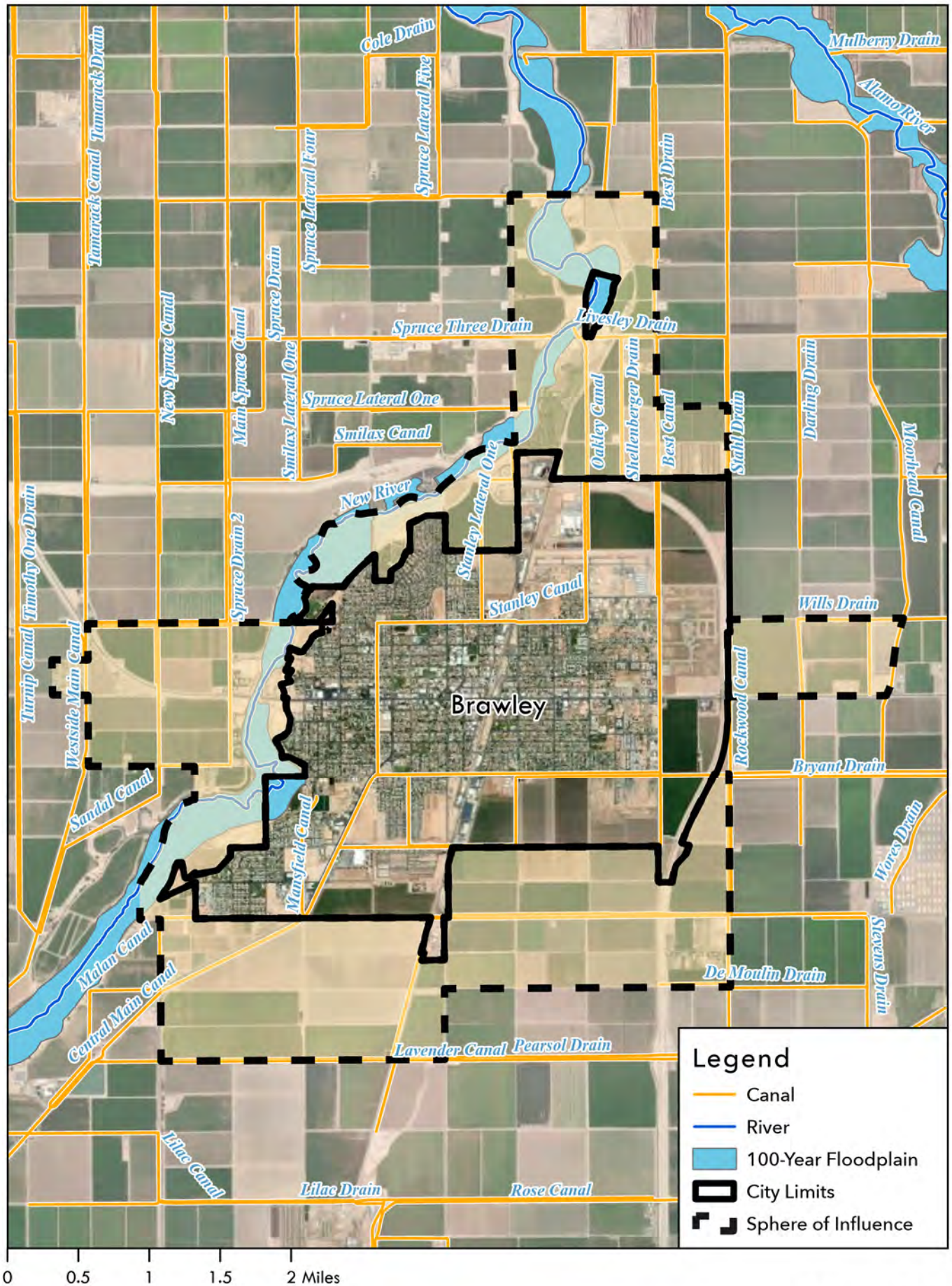


Figure 4-4
Canals, Drains and Flood Zones

4.2 FLOOD CONTROL/DRAINAGE FACILITIES

Flood control refers to planning, design, construction, and maintenance of flood control facilities to safely convey drainage, whether natural or human-made, through a development area to an existing watercourse downstream. The study area lies within the established jurisdictional boundaries of Imperial County and the Imperial Irrigation District (IID). The majority of the City of Brawley is not within a flood plain, as designated by the Federal Emergency Management Agency's (FEMA). Within Brawley's jurisdiction, 72 acres of land lie within the 100-year floodplain of the New River. Of this, 32 acres encompass the site of Brawley's wastewater treatment plant. This facility is located at an exclave, a portion of Brawley's territory that is geographically separated from the main part of the city but remains under city jurisdiction. The remaining 40 acres are situated along the western border of the city, mostly occupying the Cattle Call Arena and River Park.

4.2.1 Performance Standards

The City's standards are similar to those utilized by the County. During the review of proposed development projects, the City will require the Owner/Developer to provide detailed drainage analysis of the project site which include analysis of existing and proposed conditions, including any proposed drainage facilities (e.g. retention basins) to provide flow mitigation.. The City will require developers to construct all drainage facilities within each project as a condition of approval that is stated during the entitlement process. The City will also require the owner/developer to assess the potential of a project to adversely affect offsite drainage and require mitigation measures where needed. The City will maintain any drainage facilities within it's right-of-way. All drainage facilities that are built on private property will be required to be maintained in perpetuity by the Owner or Owner's Designated representative. A recorded maintenance agreement with the City is required for any flood control facilities that also provide water quality treatment.. Consideration will be given to development phasing to assure that drainage facilities are installed in an orderly manner to prevent flooding upstream or downstream of the project.

In order to provide flood control protection for downstream properties, drainage improvements will require that post-construction flows do not exceed the pre-construction condition. All proposed drainage systems should be designed in accordance with current IID Engineering Design Guidelines and Standards. The IID allows a single 12-inch discharge pipe for every 160 acres drained. Prior to the approval of each final subdivision map, grading plan, or implementing permit, a drainage study will be conducted by a Registered Civil Engineer and submitted for review and approval by the City of Brawley and IID. The performance standard recommended for drainage facilities is to prevent flood conditions that would adversely affect residences, businesses, and facilities during a 100-year frequency storm event. The City of Brawley is a "Traditional Permittee" that complies with the State's Phase II Small MS4 permit. Note that additional best management practices (BMPs) may be required for development projects based on the Phase II Small MS4 requirements.

4.2.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities

Local drainage patterns within the valley have been altered through agricultural activities. The water used to irrigate virtually the entire Imperial Valley originates from the Colorado River. The IID maintains hundreds of irrigation drainage structures, which collect surface water runoff and subsurface drainage from some thousands of miles of agriculture drains and channels that flow

into the New River and Alamo River, which ultimately drain into the Salton Sea. The canals and laterals are often open and unprotected.

The City's drainage system is located within its urban area, and the City is responsible for planning, construction, and maintenance of its system. Approximately half of the City's drainage system is currently combined with the City's sewer system. The areas of the drainage system that are combined with the City's sewer system are generally located in older sections of the City. The separate storm drain system consists of approximately 17 miles of gravity pipeline, hundreds of inlets, 6 to 8 detention basins, three (3) stormwater pump stations, and approximately 300 feet of forcemain. The City has prioritized the requirement for new developments to separate new storm drain facilities from sewers whenever feasible. The City manages three operational lift stations: Lift Station 1 at 9th and Malan, Lift Station 2 at Citrus View, and Lift Station 3 at Latigo Ranch. Since the preparation of the 2018 Brawley SAP, new storm drainage pipes and collection catch basins have been installed at East Legion Street, South Western Avenue and Wildcat Avenue to improve stormwater management and reduce flooding risks.

Adequacy of Existing Facilities

Most of the flat irrigated valley, with its low-lying canal/drain systems, is subject to minor, shallow flooding and ponding due to the lack of local topographic relief, occasional intense storm events, and low soil infiltration rates that produce rapid runoff flows. According to the City of Brawley Urban Water Management Plan (UWMP), this flooding does not impact or disrupt the canal water supply, nor does it damage the infrastructure. The combination of the City's drainage system with the City's sewer system has caused the wastewater treatment plant to overload during rains to m events. The City of Brawley desires to separate the drain system from the sanitary sewer to avoid occurrences of insufficiently treated outfalls at the wastewater treatment plant and to direct the conveyance of the storm drainage to a safe outlet. The City has not changed the existing infrastructure to separate Stormwater from the sanitary system.

Most of the older portion of the system discharge to the New River at various locations, while the newer systems (mostly in the areas south of Malan Street) discharge to individual detention basins sized for the 100-year storm. Much of the runoff collected in these basins evaporates and infiltrates into the ground, while a small pump station pumps runoff to the nearest gravity system. The City does not treat and reuse stormwater. IID manages open channel gravity flow irrigation and drainage systems, delivering wholesale canal water to the City of Brawley. The IID also limits the outfall capacity of its drainage system in order to reduce downstream flooding potential from combined agricultural and storm runoff until IID can complete the process of preparing a Preliminary Master Drainage Plan.

Storm drain pollution is a significant challenge for the City of Brawley, impacting local drains, the New River, and the Salton Sea. Many of the city's storm drains connect directly to local waterways without treatment, allowing pollutants such as trash, grease, construction products, and vehicle solvents to enter these systems. Additionally, non-stormwater discharge activities like overwatering lawns, car washing, and hosing down driveways contribute contaminants such as pet droppings, fertilizers, and cleaning solvents, which are washed into the storm drains during rainfall, negatively affecting the local ecosystem. To mitigate these issues and to comply with the City's Stormwater Management Plan, the City of Brawley is developing municipal codes to prevent and enforce against illegal dumping into the storm drain system.

The City plans to develop a storm water resource plan by 2028, following the completion of the updated Wastewater/Stormwater Master Plan in 2026. This initiative will leverage funding sources and programs from the California State Water Resources Control Board, such as the Integrated Regional Water Management (IRWM) program, the Storm Water Grant Program (SWGP), and the Strategy to Optimize Resource Management of Storm Water (STORMS). These programs provide financial assistance and support for projects aimed at improving water quality, enhancing regional water management, and treating stormwater as a valuable resource. By utilizing these resources, Brawley aims to enhance its stormwater infrastructure, improve water management practices, and ensure compliance with state regulations.

The Latigo Ranch, Victoria Homes, and La Paloma developments have been equipped with stormwater retention basins. The lift station at Lucky Ranch remains non-operational due to incomplete development, and La Paloma has yet to install a lift station. These basins are crucial for managing runoff, mitigating flood risks, and enhancing overall water management within newer residential areas.

Future Demand for Facilities

To accommodate future population growth, Brawley plans to expand its drainage facilities and possibly increase personnel to manage the additional demands on the system. The City continually assesses drainage conditions for new project sites and mandates the construction of necessary drainage infrastructure on a project-by-project basis, ensuring that new developments do not overload existing systems. All projects must comply with the Regional Water Quality Control Board requirements and the City's adopted Storm Water Management Plan. Development proposals are also required to design detention basins to retain stormwater generated by a 100-year/24-hour storm event.

Future development proposals within the City's Sphere of Influence (SOI) may be required to construct grass or rock-lined detention basins to manage stormwater until offsite peak flows have passed. These basins will discharge runoff through appropriately sized outfall structures into existing drains, subject to approval by the Imperial Irrigation District (IID). These basins can be located within development projects or other maintained open spaces, such as airport buffer zones. Additional improvements will include installing curbs and gutters to convey surface flows, catch basins, and underground storm drains to manage excess street capacities. Future developments may also be required to relocate and underground existing canals and drains within their project areas to IID's satisfaction, enhancing the overall drainage infrastructure and ensuring efficient stormwater management. Special emphasis for future facilities will be placed on flood control improvements that also incorporate water quality benefits. This ensures a multi-beneficial option for both flood control and water quality on a regional basis.

Rancho Los Lagos

The Storm Drain Master Plan for the Rancho Los Lagos (RLL) development serves as the foundation for establishing criteria regarding master drainage facility sizes and layouts. This plan incorporated thorough analysis, including peak flow assessments for storm drain sizing and the determination of 100-year storm volumes for flood control basins. The backbone infrastructure for flood control comprises strategically located flood control basins throughout the site, alongside an underground storm drain system network featuring catch basins, drainage area inlets, and inlet structures distributed across all phases. These systems culminate in a final connection to the Pearsol drain, which will operate solely during emergency overflow conditions.

Modeling results from the Master Plan demonstrated that the preliminary facility layouts will

adequately facilitate the safe conveyance of a hundred-year storm through RLL. Flood control basins are specifically designed to provide the necessary volume for flood protection. During a 100-year storm event, additional local storage will be achieved through stormwater ponding in designated areas such as the Community Park and golf course, where the ponding depth remains under 6 inches.

To ensure compliance and effectiveness, the final engineering details of each phase will adhere to County guidelines, standards, and procedures. This includes appropriately sizing facilities and inlet/outlet structures to mitigate peak flows and volumes, ultimately safeguarding existing conditions and enhancing the overall resilience of the drainage infrastructure within RLL.

Opportunities for Shared Facilities

The La Paloma Specific Plan includes retention basins, which may be used as a park. The Rancho Los Lagos Community Park and golf course can provide additional local storage during a 100-year storm event.

Phasing

The City will require developers to construct all drainage facilities once they are approved and accepted. Consideration will be given to development phasing to assure that drainage facilities are installed in an orderly manner to prevent flooding upstream or downstream of the project. As new development occurs, the City will require the developers within the area to plan, fund, and install all public drainage improvements associated with the project. New developments must include a stormwater improvement plan and a stormwater management plan. The City may choose to construct storm drain improvements linking the study area to other developed areas in the City. These improvements may include storm drains, open channels, detention basins, and outlets to IID facilities. The City assumes responsibility for installation and maintenance of those facilities within their right-of way or public property.

The City will require drainage facilities to be installed as development proceeds in newly annexed areas. The changes in service level within the newly annexed areas will include the following:

- Street improvements will include curb and gutter to convey surface flows in an orderly and easily maintained manner.
- Catch basins and underground storm drains will be installed to convey flows as the street capacities are exceeded.
- Detention basins will be constructed to control the developed run-off, help mitigate downstream drainage problems and replenish ground water supplies where possible.

To maintain low flood hazards, the City will continue to discourage development in the New River flood channel (see Figure 4-4: Canals, Drains, and Flood Zones). As indicated on the Land Use Policy Map in the General Plan Land Use Element and in the Open Space/Recreation Element, the New River channel is nearly designated as Open Space (see Figure 4-5: Open Space and Parks). Development of the land under the Open Space designation will be limited to passive and active recreational uses. To keep flood hazards minimal, the development intensity allowed under the Open Space category is very low and no residential uses are allowed.

The objective of the 2026 Wastewater/Stormwater Master Plan is to employ a phasing approach, identifying, evaluating and prioritizing system improvements that will alleviate

existing system deficiencies. The plan will establish a minimum acceptable level of service by identifying deficiencies in existing wastewater and stormwater facilities, thereby determining the necessary scale of improvements. It involves identifying and evaluating system improvements that will ensure infrastructure meets the needs of the community effectively. It will develop a comprehensive capital improvement program, including detailed cost estimates, to guide infrastructure enhancement and expansion efforts. Central to the plan is the prioritization of projects through phased planning, ensuring efficient resource allocation and timely addressing of critical infrastructure needs. Additionally, the plan will seek to diversify funding sources by exploring alternative financing options, optimizing financial resources and ensuring the feasibility of proposed improvements.

4.2.3 Funding

Current Funding

Funding may be obtained from impact fees, assessment districts, development bonds, Mello-Roos Districts, or other techniques for capital improvement financing. The City may also exercise some flexibility in determining alternative financing mechanisms for projects that benefit the community. The City continues to receive funding from the General Fund, Development Impact Fees (DIF), Mello-Roos community facilities tax, special tax, and grants, with no new funding sources identified at this time. The City may reduce or waive particular DIFs or use bonding to fund infrastructure improvements within new developments. Staffing and maintenance costs for expanded flood control services will be financed by the City similarly to how these services are presently funded.

The City has identified several specific funding sources for various needs:

- **Fire Facilities Expansion:** Currently using DIF funding for the expansion of Fire Station 1. The department is actively seeking grant funding and has utilized ARPA funding for a new fire truck.
- **Development Impact Fees (DIFs):** Currently, 6% of the DIF structure fee is allocated to Fire Services. A new DIF study is needed to evaluate the current allocation.
- **Community Facility Districts (CFDs):** Several CFDs provide funding for fire facilities and operations, including Victoria Park, Latigo Ranch, La Paloma, Malan Park, Luckey Ranch, and Springhouse.

• The 2026 Wastewater/Stormwater Master Plan will identify all available sources for drainage facility maintenance, improvements, and potential expansions. These sources include homeowner association agreements, development impact fees, mitigation through community facilities district funds, and grants. By leveraging these diverse funding streams, the master plan ensures sufficient financial resources are allocated to support the ongoing maintenance and enhancement of drainage facilities, as well as potential expansion projects.

Cost Avoidance Opportunities

There are no cost avoidance opportunities.

Future Funding Sources/Recommended Funding

Funding responsibilities for project-related facilities will remain with developers and will be secured

prior to construction. The City is planning to pursue an additional half-cent transactional sales tax to increase general fund revenue to support city services. Furthermore, the City will continue to explore grant opportunities and other funding mechanisms to finance future expansions and improvements.

4.2.4 Recommendations

In order for the City to assure adequate flood control/drainage facilities within its boundaries as development continues within the City boundaries and within the SOI, the City will implement the following measures.

- Continue to require that new development projects incorporate flood control and water quality mitigation measures where applicable, and provide adequate facilities to convey storm flow. If a development proposal would result in drainage into the City's system, the City would require that the developer consult with the Department of Public Works to assure that improvements are engineered and constructed to City standards.
- Complete the storm water resource plan by 2028, following the update of the Wastewater/Stormwater Master Plan in 2026. This plan will address stormwater management and pollution prevention.
- Utilize the Integrated Regional Water Management (IRWM) program to fund projects that enhance regional water management, improve water supply reliability, and increase climate resilience.
- Implement the drainage infrastructure recommendations outlined in the Rancho Los Lagos Storm Drain Master Plan to bolster resilience against flood risks and ensure optimal stormwater management within the development.

The City may choose to construct storm drain improvements linking the study area to other developed areas in the City. These improvements may include storm drains, open channels, detention basins, and outlets to IID facilities.

This page intentionally left blank.

This page intentionally left blank.

This page intentionally left blank.

4.3 FIRE FACILITIES

The City of Brawley provides fire suppression, fire protection, and emergency medical services within its city limits. Fire suppression involves the use of personnel and equipment to respond to fires and emergencies. Fire prevention is accomplished through a pro-active program of inspections, code enforcement, and public education. Emergency medical services entail pre-hospital medical care provided to victims of accidents or sudden illness. Currently, Imperial County contracts with the City to provide manpower for fire suppression in the SOI, and the County provides fire engines for this contractual service. The sum of residents and employees within the Brawley city limits is considered the service population for the Brawley Fire Department facilities.

4.3.1 Performance Standards

Performance standards for fire services are defined in terms of response times of department personnel to fire and medical emergency calls. The City of Brawley Fire Department (CBFD) has adopted standards for fire and emergency response performance based on the National Fire Protection Association Standard 1710 (2020). All times are from the receipt of a dispatch notification for emergency service:

Turnout Times:

EMS	60 seconds
Fire	80 seconds

Alarm Answering Time:

15 sec 95% of the time
40 sec 99% of the time

Alarm Processing Time:

64 sec 95% of the time
106 sec 99% of the time

Response Times:

First-due Engine	240 sec (4 min) 90% of the time
Second-due Engine	360 sec (6 min) 90% of the time
Initial full alarm - Low/med hazard	480 sec (8 min) 90% of the time
Initial full alarm - High hazard	610 sec (10 min 10 sec) 90% of the time

The performance standard for staffing is 1 firefighter per 1,000 population. This translates to the daily staffing of 1 firefighter per 3,000 residents on the current 3-shift model.

4.3.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities and Staff

The City of Brawley Fire Department maintains two fire stations within the City. The Main Fire Station (Station #1) is located just west of the railroad at 815 Main Street. The 10,119-square-foot station on Main Street occupies a 29,520-square-foot site. In addition to engine storage and staff quarters. Fire Station #2 is located east of the railroad at 1505 Jones Street and consists of approximately 8,500 square feet. Administration as well as the Chief and Deputy Chief's offices are located at Fire Station #2. Firefighting trucks and vehicles are shared between both stations, although specific facilities are housed at one primary station. No additional facilities have been approved.

Mutual aid agreements have been established with all cities in the County to address incidents requiring equipment/personnel beyond the City Fire Department's capacity to respond. These agreements result in the dispatch of the closest unit available to respond upon request for services. The BFD maintains one County provided fire engine at the BFD facility. This County engine responds to calls in the unincorporated areas with BFD personnel. The primary agency providing assistance is the City of Calipatria, which is located approximately 10 miles north. Estimated response time from Calipatria station is approximately 15 minutes. However, since the 2018 Service Area Plan, the staffing provided by other agencies during mutual aid has decreased, resulting in higher level of alarm requests (3rd alarm request vs. 2nd alarm) becoming more frequent.

Table 4.3-2 provides a summary of the existing Fire Department's facilities.

Table 4.3-2 Existing Fire Facilities

Fire Facility	Main Fire Station (Station #1)	Fire Substation (Station #2)
Fire Station	10,119 square feet	8,500 square feet
Firefighter (Full-Time, Daily)	4	3
Fire Engine	2	2
Ladder Truck	0	1
Rescue Vehicle	1	1
Utility Vehicle	1	0
Staff Vehicle	0	1
Command Vehicle	0	2

The City maintains one Fire Chief and several call-paid reserves, both of which contribute to the provision of fire suppression services; however, there are established service requirement standards that apply to full-time firefighters and their adequacy is not evaluated. Fire Station #1 is staffed with four full-time and Fire Station #2 is staffed with three full-time firefighters daily. The CBFD maintains a 24-hour coverage and has a staffing level of seven full-time firefighters per day, out of 22 total firefighters.

The average response for fire services is 322 seconds, and the average response time for EMS is 281 seconds. The Cbfd's current response times for each zone are:

Fire:

NW Zone: 294 seconds
NE Zone: 308 seconds
SE Zone: 315 seconds
SW Zone: 368 minutes

EMS:

NW Zone: 238 seconds
NE Zone: 277 seconds
SE Zone: 331 seconds
SW Zone: 276

Adequacy of Existing Facilities and Staff

Within an existing population of approximately 35,000, the Cbfd is currently staffed at a rate of 0.2 firefighters per 1,000 residents. This was calculated using the following formula:

$$22 \text{ Firefighters} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 0.62 \text{ firefighters per } 1,000 \text{ residents}$$

With the desired performance standard of 1 firefighter per 1,000 residents, the Cbfd would need to employ 35 firefighters. This would require employing an additional 13 firefighters to meet the performance standard.

The average response time for fire is 322 seconds, and the average response time for EMS is 281. The desired performance standard is 80 seconds for fire turnout and 60 seconds for EMS turnout. Response times will need to be improved by 82 seconds for fire turnout and 41 seconds for EMS turnout.

The Insurance Services Office, Commercial Risk Services, Inc. (ISO) evaluates each fire district nationwide and rates the district according to its firefighting services, water availability, and other factors relevant to fire protection and requires minimum water pressure standards. In addition, a National Fire Protection Association provides recommendations for the siting of stations. As a result, a 1.5-mile maximum response distance for emergency calls has been established. Within the City's boundary, the ISO rating is 4 (Luckey Ranch Draft EIR 1999). The rating system utilizes a 0–10 scale; areas of lower fire risk received the lowest rating. Per a letter dated October 20, 2004, from the ISO Community Outreach Program, the current fire insurance classification for the City of Brawley continues to be appropriate. The current staffing levels and response do not meet the operations needs or the performance standards of the Cbfd. This may impact the department's ability to provide emergency and fire services into the future.

Future Demand for Facilities and Staff

Increased development within the City and SOI boundaries will continue to increase the need for fire protection services, including personnel and equipment. Current plans suggest that the majority of both residential and employment growth will occur in peripheral growth areas east of the railroad tracks and outside the 1.5-mile service radius of the existing fire stations. The City will require additional staff and facilities to provide adequate fire and emergency services to the City.

The City is currently not on track to meet the performance standards for future staffing and response times based on the City's 2045 population of 58,758. Future demand for staff is calculated using the following formula:

$$57 \text{ firefighters} / 58,758 \text{ residents} \times 1,000 \text{ residents} = 1 \text{ firefighter per } 1,000 \text{ residents}$$

Using the performance standard of 1 firefighter per 1,000 residents, the CBFD will need to employ 57 firefighters by 2045. The CBFD will need to employ an additional 35 firefighters to achieve the performance standard for future demand.

There are no additional facilities planned at this time. Any future facilities would need to consider the location of the train tracks to ensure adequate response times to all areas of the City. According to the Fire Chief, additional facilities to serve future development through the year 2030 should include two additional fire substations ranging in size between 7,000 and 8,000 square feet each, and includes fire apparatus floor, living quarters, and offices. Each station should be staffed with three or four firefighters.

Rancho Los Lagos

The Rancho Los Lagos Specific Plan incorporates estimates regarding emergency response times from the nearest existing City fire station to the farthest point within the designated area. It is projected that these response times will range from nine to twelve minutes. This estimation takes into account factors such as distance, road conditions, and traffic patterns, aiming to ensure adequate emergency service coverage for all residents and developments within the plan area.

Given the established performance standard of responding to emergencies within 5 minutes or less, the Specific Plan includes provisions to address potential delays. Specifically, a site has been reserved within the commercial/multi-family mixed-use area of the plan. This reserved site is designated for the future construction of a fire station, strategically located to optimize response times and ensure that emergency services can meet the required standards throughout the development.

This proactive planning approach underscores the importance of public safety and emergency preparedness within the Rancho Los Lagos community, aiming to provide residents and businesses with reliable and timely emergency response services as the area continues to grow and develop. With that in mind, the development of Rancho Los Lagos is contingent on market demand.

Opportunities for Shared Facilities

Mutual aid agreements have been established with cities in the County to address incidents requiring equipment/personnel beyond the City Fire Department's capacity to respond. There are no opportunities to share facilities with any of the jurisdictions that maintain mutual aid agreements with the city.

The city leases space at both fire stations to the local ground ambulance provider, AMR. There are no identified opportunities for additional shared facilities.

Phasing

There is no plan for phasing at this time. Plans for a third fire station or a new main fire station located in an area to decrease response times to the SW zone of the city are anticipated in the future. Future phasing will be tied to available funding, population growth, location of new

development and response times.

4.3.3 Funding

Current Funding

The City's Fire Department receives funding from General Fund and Development Impact Fees. Additional sources of revenue for fire protection services include Mello-Roos community facilities tax, special tax for fire services, and grants. Additionally, the city leases space at both fire stations to the local ground ambulance provider which provides a source of revenue for the Cbfd.

The Cbfd received \$685,191 for a new fire truck from the American Rescue Plan Act in 2023.

Currently the DIF structure fee reflects that 6% of the fee gets allocated to Fire Services. A new DIF study is needed to evaluate the current allocation.

The Community Facility Districts (CFDs) provides funding for fire facilities and operations. Currently, the following CFDs provide funding for fire facilities and operations:

- CFD Victoria Park
- CFD Latigo Ranch
- CFD La Paloma
- CFD Malan Park
- CFD Luckey Ranch
- CFD Springhouse

Per Capita Costs

For FY2023/2024, the Brawley City Council approved an operating budget of \$4,221,497.00 for fire facilities, which includes funding for supplies and materials, services, and employee compensation. Considering an existing City population of 35,000 (2024), the current per capita operating cost is approximately \$120.61.

Future Funding Costs

Projecting the \$120.61 per capita fire facilities operating cost over the planning period for the SAP, the fire facilities operating cost would require approximately \$6,855,952 by 2045 to support the projected population of 58,758 residents. This projection is in FY 2023/2024 dollars and does not account for inflation.

Cost Avoidance Opportunities

There are no opportunities to reduce costs.

Recommended Funding/Future Funding Sources

Additional sources of revenue for fire protection facilities may include general taxes (i.e., property, sales, use, business license, utility users, transient occupancy, etc.), motor vehicle license fee, benefit assessment, and exactions. Staffing and maintenance costs for expanded fire protection and emergency response services will be financed by the City general fund, similar to the manner in which these services are presently funded by the City. Additional sources of revenue for fire protection services include Mello-Roos community facilities tax, special tax for fire services, and grants.

Additionally, in 2019 the City of Brawley began assessing a cost-recovery fee for responding to certain incidents (EMS, Rescues, False-alarms and Hazardous Materials releases). Future funding may result from the implementation of a cost-recovery fee.

A city-wide fee schedule study is currently underway, with anticipation of increased revenues when completed. Grant funding for equipment and personnel have been actively applied for, with no awards to date.

The City believes future development will increase sales and property taxes, and therefore help to pay for previous and existing inadequacies in its firefighting capacity. Increases in sales and property taxes will also help provide for future facilities and operations. In addition to increased sales and property taxes from future development,

4.3.4 Recommendations

To meet performance standards and ensure the City is providing adequate law enforcement services, the City will implement the following measures:

- Pursue additional finances to fund additional, personnel, equipment, and vehicles of the Fire Department.
- Hire additional full time firefighters to meet the City's ideal standard of 1 firefighter per 1,000 population.
- Create a plan to construct new fire station that is strategically located to lower response times to meet the performance standards.
- Create a detailed phasing plan to scale the City of Brawley's Fire Department capability in alignment with the city's growth and available funding streams.

This page intentionally left blank.

4.4 LAW ENFORCEMENT

The Brawley Police Department provides law enforcement and investigation services within the city limits, and the Imperial County Sheriff provides law enforcement in the City's SOI, in addition to custodial services (County jail facilities) for city and non-city areas. The California Highway Patrol provides traffic law enforcement on State Routes and unincorporated County roads. Mutual aid agreements exist with other Imperial Valley municipalities, which can provide assistance during an emergency.

4.4.1 Performance Standards

Performance standards for police services are defined in terms of response times of department personnel to law enforcement and emergency calls. The Brawley Police Department (BPD) has a staffing standard of 1.5 sworn officers per 1,000 residents. The BPD also maintains a standard of 1 non-sworn employee for every 2 sworn officers and 1 patrol car for every 2 sworn officers.

Currently, the City aims to have 4 sworn officers at all times, with plans to increase this performance standard to 5 sworn officers when additional resources become available. The BPD maintains a performance standard of 7 minutes or less for all emergency calls.

4.4.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities and Staff

The existing police station on Main Street near the intersection of Main and 3rd Streets encompasses 13,800 square feet. In 2013, the construction of a new 2,000 square foot Emergency Operations Center (EOC) was completed and integrated with the existing building. The Brawley Police Department has 26 general fund sworn officer positions and 15 non-sworn officer positions. On average, the response time for all calls is within 10 minutes.

Currently, BPD's response times for various categories of calls for service is:

- Crimes in progress: 7.5 minutes
- Crimes just occurred: 10.5 minutes
- Crimes past occurred: 15 minutes

Table 4.4-2 Existing Law Enforcement Facilities

Law Enforcement Facility/Equipment	Amount/Size
Police Station	13,800 square feet
Marked Patrol Car	14
Marked Transport Van	1
Marked Utility Truck	1

Sworn Officers	Amount
Chief of Police	1
Assistant Chief	1
Commander	1
Sergeant	5
Detective Sergeant	1
Detective	2
Narcotics Officer	1
Police Officer	14
Total Sworn Officers	27

Adequacy of Existing Facilities and Staff

With 26 sworn officers and an existing population of approximately 35,000, the BPD is currently staffed at a rate of 0.77 officers per 1,000 residents. This was calculated using the following formula:

$$27 \text{ sworn officers} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 0.77 \text{ officers per } 1,000 \text{ residents}$$

With the desired performance standard of 1.5 sworn officers per 1,000 residents, the BPD would need to employ 52.5 officers. The BPD would need to employ 25.5 additional sworn officers to achieve the performance standard. With consideration for the goal of 1 non-sworn employee for every 2 sworn officers, with 52.5 sworn officers, there would need to be 26.25 non-sworn employees to meet the performance standard. As such, the BPD is currently in a deficit of 11.25 non-sworn employees.

Additionally, to meet the performance standard of having 1 patrol car for every 2 sworn officers, with 52.5 sworn officers there would need to be 26.25 patrol cars. The BPD is in a deficit of 14.25 patrol cars.

With average response times for all calls at 10 minutes or less, and the desired performance standard of 7 minutes or less, the BPD will need to improve the response time by 3 minutes.

The current facilities and staffing levels do not meet the operations needs of the BPD. This may impact the department’s ability to address public safety needs and support the BPD’s strategic goals for future growth.

The adequacy of the existing facilities is currently compromised by staffing shortages, which have made it challenging to maintain ideal staffing levels. Ensuring a consistent presence of 4 sworn officers throughout all hours has become increasingly difficult. Recognizing the demands of the growing workload and the complexities of modern policing, it is believed that an optimal coverage model would consist of 5 sworn officers, including 1 Sergeant and 4 Officers. This staffing configuration is essential for effectively managing responsibilities and maintaining public safety standards to meet the expectations of the community.

The adequacy of existing facilities and staff, based on the city of Brawley’s estimated of 35,000 for 2024. The deficits in facilities and staff underscores a critical gap between the identified infrastructure needs and the available financial resources. This is presented below in Table 4.4-3.

Table 4.4-3 Adequacy of Existing Law Enforcement Facilities

Law Enforcement Facility	Requirement per City Standard¹	Existing	Above/Below Standard
Marked Patrol Car	26.25	12	Below
Sworn Officer	52.5	27	Below
Non-Sworn Officer	26.25	15	Below

¹ Requirement based on the 2024 City of Brawley population estimates of 35,000.

While efforts have been made to maintain or improve response times, they have not consistently met acceptable limits due to increasing service demands and operational complexities. Factors such as staffing levels, dispatch efficiency, and the strategic location of facilities relative to service areas directly influence the adequacy of response times.

Furthermore, the current law enforcement facilities no longer fully meet operational needs or support strategic goals for future growth. Since 2018, the limitations of these facilities have become more apparent, affecting daily operations and hindering the expansion of workforce and resources. Repurposing the Brawley Lyons Center for the Community Liaison Unit has addressed part of the challenge, but comprehensive planning and infrastructure development are needed to effectively serve the community and prepare for future demands.

To meet these challenges, improving response times and modernizing law enforcement facilities are crucial priorities. Securing resources to expand and enhance facilities will be essential in fulfilling the commitment to public safety and operational excellence moving forward.

Future Demand for Facilities and Staff

The City will require additional staff and facilities to provide adequate services to the City as the population increases through internal growth and annexation of the City’s SOI. The BPD is currently not on track to meet performance standards for future staffing and response times based on the City’s 2045 population of 58,758. Future demand is calculated using the following formula.

$$1.5 \text{ officers/ } 1,000 \text{ residents} \times 58,758 \text{ residents} = 88 \text{ sworn officers per } 1,000 \text{ residents}$$

Using the performance standard of 1.5 officers per 1,000 residents, the BPD would need to employ 88 sworn officers by 2045. The BPD would need to employ 61 additional sworn officers by 2045 to achieve the performance standard for future demand. With consideration for the goal of 1 non-sworn employee for every 2 sworn officers, with 88 sworn officers, there would need to be 44 non-sworn employees to meet the performance standard. As such, the BPD would need to employ 29 additional non-sworn employees.

Table 4.4-4 shows the adequacy of future law enforcement facilities and staff that will be needed for the City to provide adequate law enforcement and police protection services per their performance standards.

Table 4.4-4 Adequacy of Future Law Enforcement Facilities

Law Enforcement Facility	Requirement per City Standard (2045)¹	Existing Resources	Additional Resources Required	Above/Below Standard
Marked Patrol Car	43	12	31	Below
Sworn Officer	88	27	61	Below
Non-Sworn Officer	44	15	29	Below

There are early plans for a new police station identified in the Capital Improvement Plan (CIP);

however, due to resource constraints, the project has not advanced. The existing police station continues to be inadequate to meet the demand.

Although no new standalone facilities or stations have been commissioned, the BPD has renovated the Brawley Lions Center (Community Center) to create space for the newly established Community Liaison Unit. The remodeled space houses one community liaison officer, one crime prevention coordinator, one animal control officer, one graffiti abatement technician, and one code enforcement officer.

In addition to the facilities and staff identified in the table above, the requirements for facilities, personnel, equipment, etc., depend on the actual development timeline for each annexation area in the SOI. As the City grows and expands through annexation, development project applicants will be required to evaluate their project’s fiscal impact on existing and future public safety services.

Opportunities for Shared Facilities

The Brawley Police Department (BPD) has established mutual aid agreements with other law enforcement agencies in Imperial County. These agreements aim to improve the collective capacity of the agencies to respond to emergencies, large-scale incidents, and other situations where a single agency’s resources may not be sufficient. According to City staff, the City maintains an agreement with the United States Border Patrol’s BORTAC unit, the City of El Centro Police SWAT and the Imperial County’s Sheriff’s Department SERT (Special Enforcement Team) to provide SWAT services. Table 4.4-2 provides a detailed list of the police department’s existing facilities and personnel.

Further, the City’s narcotics operations are conducted via a County-wide task force and operate from a shared facility in the City of Imperial.

Phasing

The Capital Improvement Plan identifies future improvements between FY 2023/2024 and 2024/2025 related to police facilities and services, which specifies anticipated projects for each fiscal year.

4.4.3 Mitigation

To meet performance standards and ensure the City is providing adequate law enforcement services, the City will implement the following measures:

- Identify new funding streams to support the expansion and enhancement of law enforcement capabilities
- Conduct an annual review of number of calls and response times to determine the adequacy of existing service and any need for improvement or additional resources.
- Complete a new development impact fee (DIF) study to evaluate the fiscal impact of requiring developers to evaluate their project’s fiscal impact on existing and future public safety services. Establish clear guidelines for conducting fiscal impact analyses, detailing the data types and metrics developers must provide.
- Hire additional sworn and non-sworn officers to meet staffing standards.
- Construct new police station as identified in the Capital Improvement Plan

- Create a detailed phasing plan to scale law enforcement capabilities in alignment with city' s growth and available funding streams.
- Engage with local, state, and federal grant programs tailored for public safety initiatives and infrastructure.
- Review and potentially adjust existing tax structures or development fees to better align with current community needs and future growth projections.
- Explore public-private partnerships to attract private investment in support of public safety goals.
- Consider establishing dedicated funds or endowments for public safety, possibly through philanthropic contributions or community fundraising endeavors.
- Develop a comprehensive funding plan involving collaboration among city departments, engagement with community stakeholders, and consultation with financial experts to ensure adequate police facilities and personnel are maintained to uphold public safety standards.

4.4.4 Funding

Current Funding

Currently, funding for law enforcement comes from general tax (property, sales, use, business license, utility users, transient occupancy, etc.), Mello-Roos community facilities assessments, special tax for police services, and development impact fees and exactions. The BPD also received \$380,000 for 6 public safety vehicles and \$256,294 for police radio encryption technology from the American Rescue Plan Act in 2021.

Currently the DIF structure fee reflects that 6% of the fee gets allocated to law enforcement services. A new DIF study is needed to evaluate the current allocation.

The City believes future development will increase sales and property taxes, and therefore help to pay for previous and existing inadequacies in its law enforcement capacity. Also, increases in sales and property taxes will help provide for future facilities and operations. In addition to increased sales and property taxes from future development, CFDs may be used for new developments. CFDs can provide funding for law enforcement facilities and operations.

Per Capita Costs

For FY 2024/2025, the Brawley City Council approved an operating budget of \$7,756,824 for police protection services. Considering a City population of 35,000 from the City's 2024 estimate, the current per capita operating cost is approximately \$221.62.

Future Funding

While the City has not yet implemented additional measures from the 2018 SAP for funding future police facilities or personnel, it has secured grant funding for five positions, with the grant term ending in 2026. The City is building a General Fund reserve to cover these positions thereafter. Additional grant funding has been obtained for equipment, overtime, and school resource officers. Furthermore, the City has recently approved an additional one-cent transactional sales tax to boost general fund revenues to support law enforcement and other city services.

4.5 LIBRARY FACILITIES

The City of Brawley owns and operates a City library facility in Plaza Park near City Hall that serves the entire population of the City of Brawley from one facility. Services provided by the library include: circulation of library materials to all patrons; reference service, including telephone reference service; audio visual services, including recorded books and DVD's; Spanish language books; book reservations; inter-library loan service; and special children's programming including school class visits, story hours, movies, and craft programs. A branch facility located at 1501 I Street offers the same service with the addition of adult literacy programs.

4.5.1 Performance Standard

The performance standard for the City is a range of 300 to 600 sf of library facility space per 1,000 residents (0.30 to 0.60 sf of library facility space per capita). The performance standard for the number of library books (volumes) is a range of 2,500 to 2,750 per 1,000 residents (2.5 to 2.75 books per capita). The performance standard for the number of public-access computers is 0.50 computers per 1,000 residents.

4.5.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities

The City of Brawley owns and operates a 6,515-square-foot City library facility located at 400 Main Street called the Brawley Public Library. The County of Imperial also owns and operates the Del Rio Branch Public Library located at 1501 I Street which is 2,400 square feet. The Brawley Library Services currently has 3 full-time employees and 4 part-time employees for a total of 7 employees. The Brawley Public Library has 11 computers and 43,529 library books and the Del Rio Branch Public Library has 2 computers, and 5,176 library books. The library lends books, audiobooks, eBooks, DVDs, and toys at both library branches. The Del Rio branch also offers multiple resources for children on the autism spectrum. Both branches offer Adult Literacy services. The City dissolved the Literacy and Mobile Book Services (LAMBS) vehicle which was a mobile serve that targeted children aged 0–5 and their parents and caregivers. No new library facilities or services have been approved since 2018. Table 4.5-1 provides a detailed list of the existing Library facilities detailed in the 2010 DIF Study.

Table 4.5-1 Existing Library Facilities

Library Facility/Equipment	Amount/Size
Brawley Public Library	6,515 sf
Del Rio Branch Public Library	2,400 sf
Library Books	48,705 (total in both branches)
Computers	13
Library Employees	Amount
Full-Time	3
Part-Time	4
Total Employees	7

Adequacy of Existing Facilities

With an existing population of 35,000, there is currently 255 square feet of library space per 1,000 residents. This was calculated using the formula below:

$$8,915 \text{ sq ft library space} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 255 \text{ sq ft of library spaces per 1,000 residents}$$

With the desired performance standard of 300 to 600 square feet per 1,000 residents, the City of Brawley needs to add an additional 1,585 square feet of library space for a total of 10,500 square feet.

There are currently 1,392 books per 1,000 residents. This was calculated using the formula below:

$$48,705 \text{ library books} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 1,392 \text{ library books per 1,000 residents}$$

With the desired performance standard of 2,500 to 2,750 library books per 1,000 residents, the City of Brawley will need to add an additional 38,795 library books for a total of 87,500 library books.

There are currently 0.37 computers per 1,000 residents. This was calculated using the formula below:

$$13 \text{ computers} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 0.37 \text{ computers per 1,000 residents}$$

With the desired performance standard of 0.5 computers per 1,000 residents, the City of Brawley will need to add an additional 5 computers for a total of 18 computers.

As shown below in Table 4.5-2, current library facilities are below the City’s adopted population-based standards, which indicates that existing resources are underserved within the City. The adequacy of existing facilities and staff is presented below in Table 4.5-2 and is based on the City’s 2024 population estimate of 35,000 residents.

Table 4.5-2 Adequacy of Existing Library Facilities and Staff

Library Facility	Requirement per City Standard¹	Existing	Above/Below Standard
Public Library Space	10,500 sf	8,915 sf	Below
Library Books	87,500 books	48,705 books	Below
Computers	18 computers	13 computers	Below

¹ Requirement based on population of 35,000 from the 2024 estimate from the City of Brawley

Future Demand for Facilities and Staff

Increased development within the City boundaries and the SOI will present an increased demand on the personnel, services, and facilities of the public library. As growth continues, the City will be presented with the need for expansion of the library system to meet future need. The City is not on track to meet performance standards for library space, library books and computers. Based on the City's 2045 population of 58,758. Future demand is calculated below.

Library Space

300 sq ft of library space / 1,000 residents X 58,758 residents = 17,627 sq ft of library space

Using the performance standard of 300 to 600 square feet of library space per 1,000 residents, the City would need an additional 8,712 square feet of library space to meet future demand.

Library Books

2,500 library books / 1,000 residents X 58,758 residents = 146,895 library books

Using the performance standard of 2,500 to 2,750 library books per 1,000 residents, the City would need an additional 98,190 library books to meet future demand.

Computers

0.5 computers / 1,000 residents X 58,758 residents = 30 computers

Using the performance standard of 0.5 computers per 1,000 residents, the City would need an additional 17 computers to meet future demand.

Table 4.5-3 indicates the amount of library facilities and equipment the City will need to meet future demand.

Table 4.5-3 Adequacy of Future Library Facilities

Library Facility	Requirement per City Standard (2045)¹	Additional Resources Required	Above/Below Standard
Public Library Space	17,053 sf	8,138 sf	Below
Library Books	142,105 books	93,400 books	Below
Computers	29 computers	16 computers	Below

1. Requirement based on projected 2045 population of 47,022

Opportunities for Shared Facilities

A joint-use facility agreement with the Imperial County Office of Education is in place housing a community center/library facility at their Del Rio alternative school. It includes 2,400 square feet of library space. This agreement has not been reviewed since 2017.

Phasing

There is a plan to expand the current library space by about 4,000 to 5,000 square feet. This includes a multimedia room as well as private study rooms within the City of Brawley Public Library. There are also plans for an additional branch on the west side of the city. This would help the City to meet future demand for library services.

The expansion of the City's library services and facilities will occur in phases determined by available funding and population growth.

4.5.3 Mitigation

To meet performance standards and ensure the City is providing adequate library services, the City will need to implement the following measures:

- Periodically review the facilities and personnel of the library system through the preparation of annual reports. Such review will identify staffing and budgetary concerns as City growth continues to increase the demand on library facilities and staff.
- Continue to utilize General Fund revenue as the primary source of financing library services. Review the allocation of General Fund finances in light of the State recommendation that local libraries receive 5% of local general fund resources.
- Collect fees established in the DIF Study to meet the library facilities demands for future development.
- Apply for certification in the State Public Library Fund (PLF) program when funds are allocated by the State
- Accept donations of money and/or supplies as a means of augmenting library services while conserving allocated finances.

4.5.4 Funding

Per Capita Costs

Library services are currently funded through the General Fund, Library Development Impact Fees. The City has been awarded a Grant to improve/repair the current library facilities.

For FY 2023/2024, the Brawley City Council approved an operating budget of \$454,414 for library services. Considering a City population of 35,000 from the 2024 City of Brawley estimates, the current per capita operating cost is approximately \$12.99.

Future Funding Costs

In addition to current funding, the city has identified additional funding streams including:

- Library staff pursues state grants and partnerships with local agencies to fund projects as needed.
- The City is looking into an additional half cent Transactional Sale tax to increase revenues for the general fund.
- The department is actively seeking for grants to assist with infrastructure and community programs.

4.5.5 Recommendations

In order for the City to provide its residents with adequate library services and to assure that the library system is sufficiently expanded to accommodate growth within the City and the boundaries of the SOI, the City will implement the following measures:

- Increase the Brawley Public Library's space by approximately 4,000 to 5,000 square feet, including a multimedia room and private study rooms.
- Require the development of libraries within community centers for parks.
- Plan for an additional library branch on the west side of the city to meet future demand.
- Evaluate and potentially update the joint-use facility agreement with the Imperial County Office of Education to optimize resources at the Del Rio alternative school.
- Implement a phased approach to expanding library services and facilities based on available funding and population growth.
- Conduct annual reviews of library facilities and personnel to identify and address staffing and budgetary needs as the city's population and demand for services increase.
- Explore opportunities to secure state grants, partnerships with local agencies, and potentially implement a half-cent transactional sales tax to enhance library funding.
- Actively seek grants and encourage community donations to support infrastructure improvements and expand library programs and services.

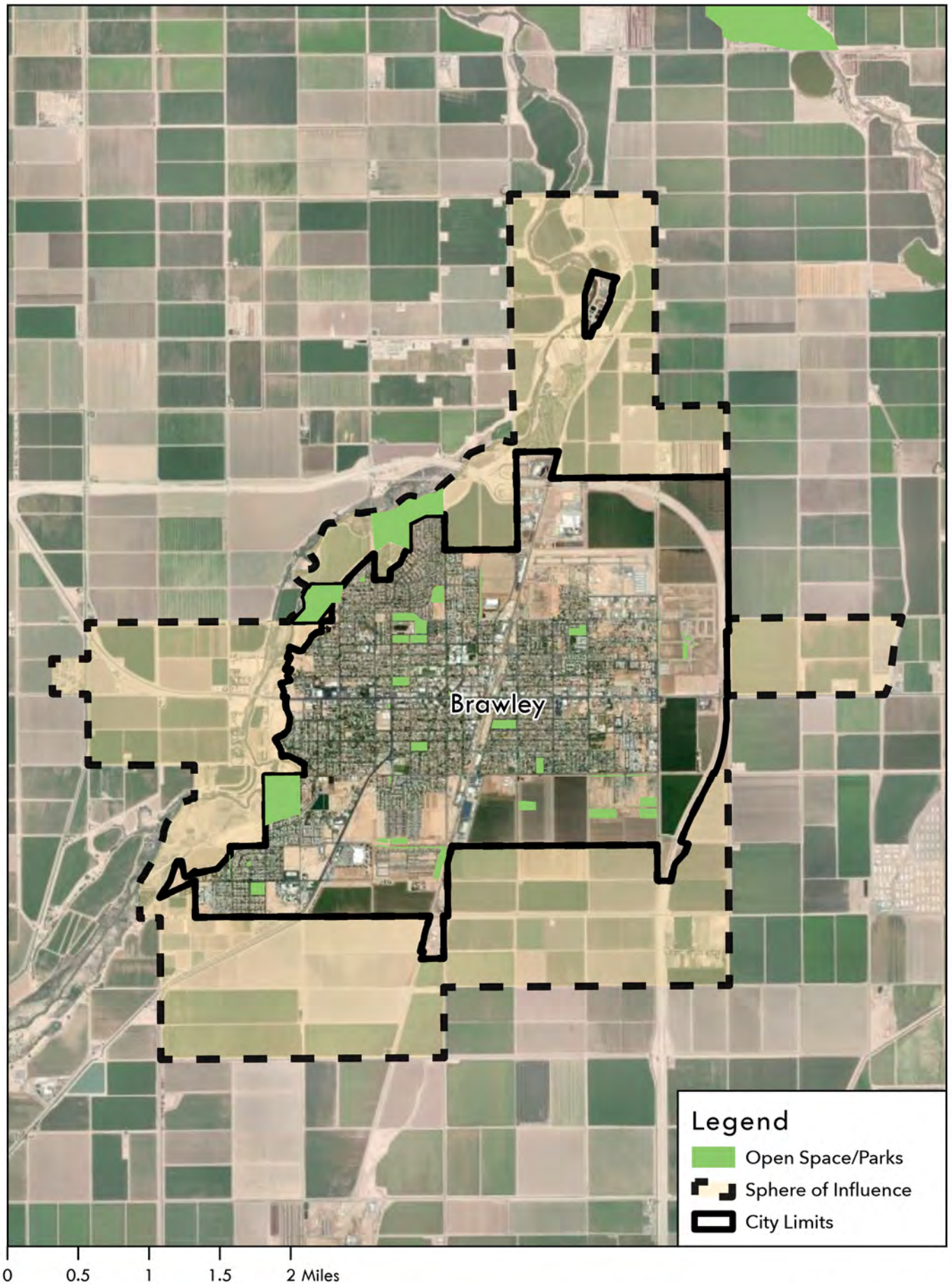


Figure 4-5
Open Space and Parks

4.6 PARKS AND RECREATION FACILITIES

The Department of Parks, Recreation, and Community Services is made up of four divisions: Parks, Recreation, Senior Citizens, and Grounds and Facility Maintenance. The City also provides local recreation programs and services for children, adults, and seniors at City facilities and in conjunction with the local school districts.

4.6.1 Performance Standards

Performance standards for parks and recreational are identified based on the type of park or recreational amenity. The overall standard for developed parkland is 5 acres per 1,000 population.

The City of Brawley does not maintain specific performance standards for recreation facilities as that is based on activity level. The City also does not maintain a performance standard parks and recreation personnel as that is based on general fund availability.

To ensure that adequate parks and recreational areas exist in Brawley to meet the needs of residents and visitors, the City will continue to use a park classification system and related park standards based on population. The park classifications per the City's Open Space/Recreation Element of the 2008 General Plan are discussed below. The established park standards for the individual park classifications (mini-park, neighborhood park, and community park) below are guidelines for development and are subject to change.

Mini-Park: A mini-park is a specialized facility that serves a concentrated or limited population or a specific group such as tots or senior citizens. Mini-parks are typically located within neighborhoods and in close proximity to apartments or multifamily dwellings. Mini-parks should have a service radius of less than a quarter mile and be less than 2 acres in size.

Neighborhood Park: A neighborhood park is an area for intense recreational activities, providing playing fields, courts, playgrounds, and passive use areas for walking, jogging, and picnicking. Such parks are easily accessible to neighborhood populations and are geographically centered with safe bicycle and pedestrian access. They may be developed as shared-use school/park facilities. A neighborhood park should serve a population of 5,000 and should be 2 to 15 acres in size.

Community Park: Community Parks are areas of diverse environmental quality. A community park may include areas suited for recreational facilities such as athletic complexes and large swimming pools. Such parks may be natural areas used for outdoor recreation such as walking, viewing, and picnicking. They may be a combination of the above types depending on the site and the needs of the community. Community parks serve several neighborhoods within a 1- to 2-mile radius and should cover 15 acres or larger.

4.6.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities and Staff

The department has 8 full-time employees and numerous part-time employees. Since the 2018 Service Area Plan, the City has implemented a requirement for dedication of parkland, payment of an in lieu fee or a combination of both as a condition of new residential development. This contributed to the recently completed soccer field as a part of a subdivision development on Dogwood Road, providing an additional neighborhood park.

There is currently a total of 157.07 acres of developed parkland in the City, as listed below in Table 4.6-2a and shown on Figure 4-5. School facilities are not included in parkland acreage.

Table 4.6-2a Existing Parks and Recreation Facilities

Park	Acres (Developed)
<i>Mini Parks</i>	
Ridge Park	1.63
Kissee Park	0.34
Kelley Park	0.63
Citrus View Park	0.65
Malan Park Landscape	0.53
<i>Mini Parks Subtotal</i>	<i>3.78</i>
<i>Neighborhood Parks</i>	
Abe Gonzales Park	4.42
Alyce Gereaux Park	3.88
Guadalupe Park	3.88
Hinojosa Park	6.52
Meserve Park	4.42
Parkside Park	6.5
Plaza Park	5.38
Thorton Park	5.54
Dogwood Road Soccer Field	2.00
<i>Neighborhood Parks Subtotal</i>	<i>42.54</i>
<i>Community Parks</i>	
Cattle Call and Rotary	60.00
Del Rio	3.00
Elks Youth	0.21
Lions Center Complex	15.11
Lions Center Expansion	6.20
Pat Williams Park	25.71
Senior Center	0.52
<i>Community Parks Subtotal</i>	<i>110.75</i>
Total	157.07

As shown below in Table 4.6-2b, according to City staff, the square footage of the City's community center facilities includes the following:

Table 4.6-2b Existing Community Center Facilities

Community Center Facility	Size (square feet)
Lions Recreation Center ¹	20,000
Lions Pool ¹	12,000
Brawley Teen Center ¹	5,000
Blake David Skate Park ¹	18,600
Brawley Senior Center ¹	5,000
Del Rio Community Room ²	2,400
Total	60,600

Source: ¹Sustainability Workshop, City of Brawley Parks and Recreation Department (2012)
²Marjo Mello, Interim Parks and Recreation Director

4.6.3 Adequacy of Existing Facilities and Staff

With a population of 35,000 (City of Brawley, 2024) the calculation below shows how many acres of parkland per 1,000 residents.

$$157.07 \text{ acres} / 35,000 \text{ residents} \times 1,000 \text{ residents} = 4.49 \text{ acres per } 1,000 \text{ residents}$$

Using the performance standard of 5 acres of parkland per 1,000 people, the city is currently not meeting the performance standard with a total of 4.49 acres per 1,000 people. The city needs an additional 0.11 acres of parkland per 1,000 people which is a total of 17.93 acres.

4.6.4 Future Demand for Facilities and Staff

Projected population growth within the City will result in an increased demand for facilities and services. The City will extend recreation programming and services to annexed areas in the same manner as they are provided within the existing City. If the need for additional parks arises for future annexations, each development would be required to dedicate and/or construct parks to serve each particular area per the City performance standards.

The City is currently not on track to meet the performance standard for parks and recreation facilities in 2045. Based on the project population for 2045 of 47,022 (City of Brawley, 2024) and the performance standard of 5 acres per 1,000 residents, future demand for parks and recreation facilities is calculated below:

$$5 \text{ acres} / 1,000 \text{ residents} \times 58,758 \text{ residents} = 294 \text{ acres of parkland}$$

The City will need to provide an additional 137 acres of parkland by 2045 to meet future demand.

The City is planning to add an additional mini park and convert existing parkland into a T-ball field to provide additional programmed space to meet demand.

RANCHO LOS LAGOS

PARK, OPEN SPACE & AMENITY DIAGRAM



LEGEND

- | | | | |
|---|-----------------|---|-------------------|
|  | Greenway |  | Amenity Park |
|  | Golf Course |  | Neighborhood Park |
|  | Retention Basin |  | Community Park |



Rancho Los Lagos

The Rancho Los Lagos Specific Plan outlines future plans for parks and open space within the Specific Plan Area. The Plan outlines the planned parks and recreation facilities including a centralized community park, six neighborhood parks, and approximately 14 mini-parks as well as an 18-hole public golf course and a private Home Owners Association (HOA) recreation facility.

The centralized community park will have a 5-acre water feature (lake). Neighborhood and mini-parks are strategically located to ensure that most residential dwelling units are located within a three to five minute walk of an open space area or recreational facility.

The total open space/recreation land use acreage is provided in Table 4.6-4 below:

Table 4.6-4 Total Open Space Area

<i>Land Use</i>	<i>Approximate Gross Acres</i>	<i>% of Total Area</i>
<i>Parks (including lakes)</i>	71	6.6
<i>Open Space/Buffers</i>	96	8.9
<i>Executive Gold Course (including lakes)</i>	139	12.9
<i>Active Adult (or Conventional) Gated Community HOA Recreation Complex</i>	12	1.1
<i>Total</i>	318	29.6

The Rancho Los Lagos Specific Plan is a phased development, with phase 1 planned for 8 years and phase 2 for 22 years. If Rancho Los Lagos is developed, the addition of 318 acres would exceed the projected future demand for parkland acreage.

4.6.5 Opportunities for Shared Facilities

The City currently has an Memorandum of Understanding with all school and county alternative education districts. Joint use opportunities may exist for the use of public school grounds, which typically contain play equipment, turf areas, sports facilities, and gymnasiums, often act as de facto parks.

4.6.6 Phasing

Several methods will be used to provide new parks and recreation facilities as the City's population grows. The City requires the inclusion of recreation facilities and open space within future residential, industrial, and commercial developments. As new development projects are proposed in Brawley, the City will assess the impact of new development on the existing parks and recreation system. The City will then require the dedication of parkland, payment of an in lieu fee, or a combination of both as a condition of new residential development pursuant to the Quimby Act.

The final location, size, type, and ultimate number of park sites will be determined based upon the approved number of dwelling units at the time of subdivision approval, following annexation of lands within the SOI. The City plans to develop its first Parks and Recreation Plan. This will

help to plan for new parks and recreational facilities as the City of Brawley continues to grow.

Future expansion and construction of additional parks facilities will be tied to population growth and the availability of funding.

4.6.7 Mitigation

To meet performance standards and ensure the City is providing adequate parks and recreation facilities, the City will need to implement the following measures:

- Pursue joint-use opportunities with the Brawley School District and the Brawley Union High School District.
- Implement CFD's and increase Development Impact Fees as population increases
- Monitor and expand the requirement of parkland dedication, payment in lieu fee or a combination of both as a condition of new residential development.
- Develop a Parks and Recreation Plan to plan for future parks and recreation facilities.

4.6.8 Funding

Current Funding

Several methods are used to provide new parks and recreation facilities as the City population grows. The City will encourage and, where appropriate, require the inclusion of recreation facilities and open space within future residential, industrial, and commercial developments. As new development projects are proposed in Brawley, the City will assess the impact of new development on the existing park and recreation system. The City will then require the dedication of parkland, payment of an in lieu fee, or a combination of both as a condition of new residential development pursuant to the Quimby Act.

In addition, the City uses Development Impact Fee funding to improve existing parks and add new infrastructure. The City is using the Community Development Block Grant (CDBG) program income funds to partially fund the rehabilitation of the Lion Center pool and roof.

The City will also continue the use of assessment districts and Adopt- A-Park program to obtain and maintain parkland. The City will continue to require all new subdivisions to fund the development and maintenance of parks through assessment districts.

Per Capita Costs

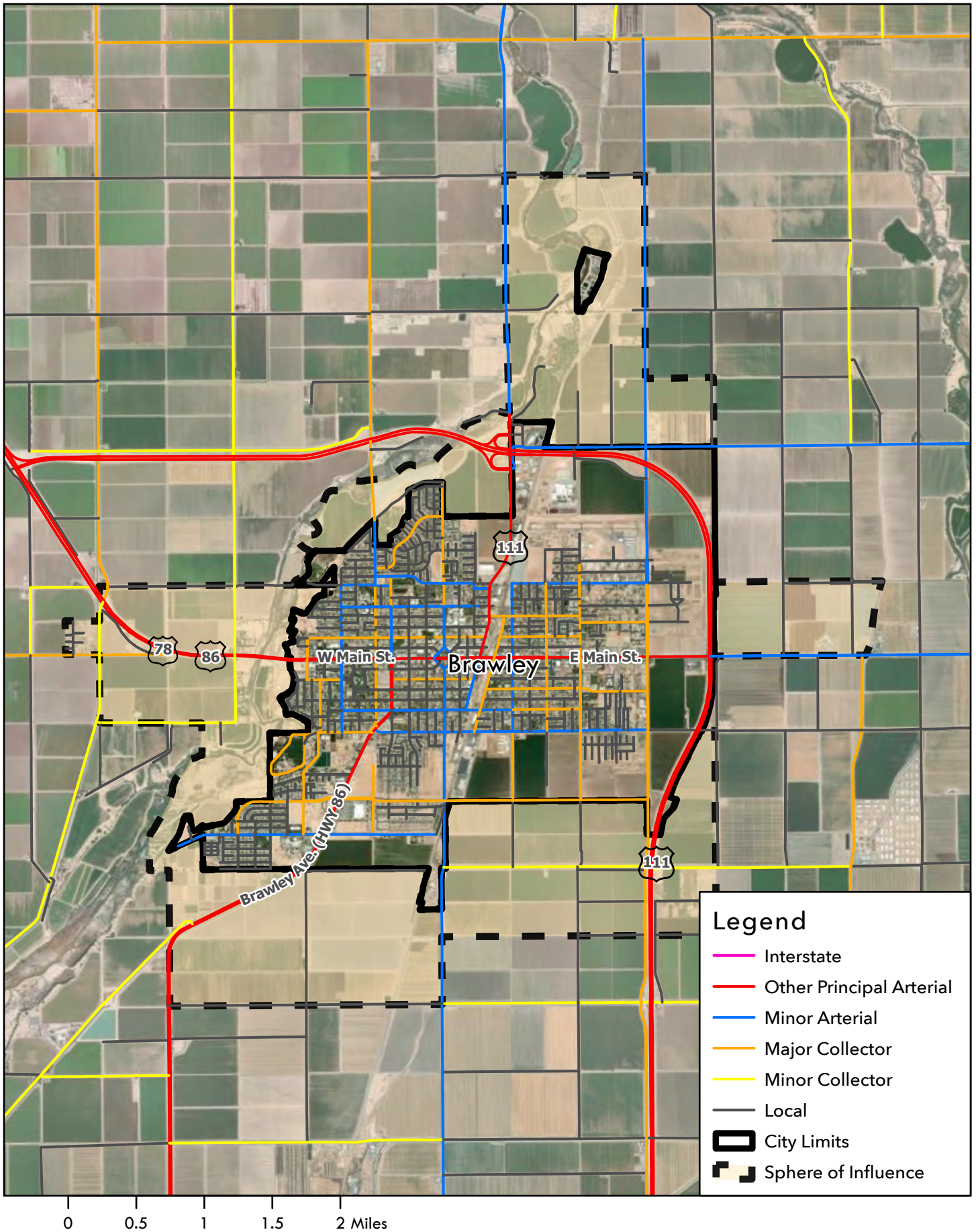
For FY 2023/2024, the Brawley City Council approved an operating budget of \$1,058,187 for parks, \$930,325 for recreation & Lions Center, and \$179,666 for senior citizen services. Considering a City population of 35,000 from the City of Brawley 2024 estimate, the current per capita operating cost is approximately \$61.95.

Recommended Funding/Future Funding Sources

Development Impact Fees are expected to finance 100% of park and recreation facility demands for future development within the City through 2030. Upon preparation of the 2025/2026 DIF study, these fees will be reevaluated to meet parkland demand. Large-scale new developments may be required to create assessment districts to improve and maintain parkland. Other future funding sources will also include current funding mechanisms. In addition, Quimby Act fees as amended by AB 1359 can be used for parks and recreation facilities in lieu of parkland acquisition.

In addition to current funding, the City has identified several future funding opportunities including:

- The City is looking into an additional half cent Transactional Sale tax to increase revenues for the general fund. The City will seek a voter approved sales tax to pay for personnel and new parkland development.
- The department is actively seeking for grants to assist with infrastructure and community programs. This may include (but is not limited to) State programs such as:
 - California State Parks Grants
 - Proposition 68 Restoration Grant Programs
 - California Natural Resources Agency Grants
 - California Wildlife Conservation Board Grants



Legend

- Interstate
- Other Principal Arterial
- Minor Arterial
- Major Collector
- Minor Collector
- Local
- City Limits
- Sphere of Influence

Figure 4-6
Circulation System

This page intentionally left blank.

4.7 CIRCULATION FACILITIES

The City of Brawley owns and maintains local public streets within the City while Imperial County owns and maintains local public roads in unincorporated Imperial County. State Routes throughout the County and City are owned and maintained by the state of California (the California Department of Transportation, Caltrans).

4.7.1 Performance Standards

The City of Brawley General Plan Infrastructure Element includes a classification of street types and performance standards to maintain stable traffic flow without significant delays. This is accomplished through a roadway classification system and level of service performance criteria described below. The criteria are based on the graded scale “level of service” (LOS) classification system and a technical component which specifies how traffic forecast data can be used to measure the achievement of the criteria. The Circulation Plan, as shown in the City’s General Plan, is depicted on Figure 4-6: Circulation System. The City also adopted a Non-Motorized Transportation Plan to address both bicycle and pedestrian facilities in 2013. This plan includes an adopted Bicycle Master Plan 2012, a Pedestrian Gap and Needs Analysis and recommendations for future improvements.

Roadway Classification System:

The roadway system in Brawley is defined using a classification system, which identifies a hierarchy of roadway types as shown on Figure 4-6. The categories of the classification system differentiate the size, function, and capacity of roadways. There are eight basic categories in the hierarchy: Expressway, Prime Arterial, Minor Arterial, Collector, Local Collector, Residential, Industrial Collector, and Industrial Local. These sections represent desirable standards, but variations of right-of-way width and special road improvements will occur. These categories are described below:

- **Expressway:** A six-lane divided roadway intended to serve regional and intra-county traffic with a minimum right-of-way width of 210 feet consisting of three travel lanes in each direction, a 56-foot median, and shoulders along both sides of the travel way. No on-street parking is allowed on Expressways and the minimum intersection spacing is 1 mile.
- **Prime Arterial:** A four- to six-lane divided roadway with a minimum right-of-way width of 136 feet. Prime Arterials feature raised and landscaped medians, highly restricted access, provisions for public transit lanes, including but not limited to bus lanes, train lanes, or other mass transit type means and no parking. Prime Arterials form an important component of the city and regional transportation system.
- **Minor Arterial:** These roadways provide intra-county and sub-regional service. Access and parking may be allowed, but closely restricted in such a manner as to ensure proper function of this roadway. Typical standards include the provision for four and six travel lanes with raised and landscaped medians for added safety and efficiency by providing protected left-turn lanes at selected locations. Some may also contain provisions for public transit lanes or other mass transit type means. Minimum right-of-way is 102 feet.
- **Collector:** These roadways are designed for intra-county travel as a link between the long haul facilities and the collector/local facilities. Although a Collector frequently provides direct access to abutting properties, that is not its primary purpose. Typical design features include provision for four travel lanes without a raised median, and some

may also contain provisions for public transit lanes or other mass transit type means. Minimum right-of-way is 84 feet. Parking is generally not permitted.

- **Local Collector:** These roadways are designed to connect local streets with the adjacent Collectors or arterial street system. Design standards include provision for two travel lanes and parking, except in specific locations where parking is removed to provide a turn lane at intersections. Local Collector streets frequently provide direct access to abutting properties, although that should be avoided where feasible. Minimum right-of-way is 70 feet.
- **Residential:** This street type also includes residential cul de sac and loop streets and is designed to provide direct access to abutting properties and to give access from neighborhoods to the Local Street and Collector Street system. This classification should be discontinuous in alignment to discourage through trips. Typical design standards include provision for two travel lanes, parking on both sides, and direct driveway access. Minimum right-of-way is 60 feet.
- **Industrial Collector:** The main function of this classification is to provide for efficient movement of goods for regional, subregional, and intra-county travel services. Access and parking may be allowed, but closely restricted in such a manner as to ensure safe and proper function of industrial traffic on this roadway. Typical design standards include provisions for up to four travel lanes and parking on both sides. Minimum right-of-way is 96 feet.
- **Industrial Local:** This classification is designed to connect industrial properties and areas with the adjacent Industrial Collector, Residential, Collector, or arterial system. Design standards include provisions for two travel lanes, of a minimum of 13-foot width each, and parking. Industrial streets frequently provide direct access to abutting industrial sites and parking of industrial-sized vehicles. Minimum right-of-way is 64 feet.

Performance Criteria:

“Performance Criteria” are used to evaluate the ability of the circulation system to serve existing and planned land uses. Performance criteria facilitate the comparison of future traffic volumes and future circulation system capacity and the assessment of the adequacy of the circulation system. Performance criteria establishes a desired level of service (LOS) and a technical component that specifies how traffic forecast data can be used to measure the achievement of the criteria. Levels of service range from A to E and are defined in Table 4.7.1 (General Plan/Infrastructure Element Table I-2). Table 4.7.2 (General Plan/Infrastructure Element Table I-3) shows the maximum Average Daily Traffic (ADT) accommodated by LOS A through E for the four roadway categories described above.

This page intentionally left blank.

Table 4.7-1 Level of Service for Brawley Circulation Performance Criteria

Level of Service	Description
A	Represents free flow. Individual drivers have a high degree of freedom to select their travel speeds and are generally unaffected by other vehicles in the traffic system.
B	Represents stable flow, but individual drivers are somewhat affected by other vehicles in determining travel speeds.
C	Represents stable flow, but the selection of the speeds of individual drivers is significantly affected by other vehicles.
D	Represents a condition of high-density, stable traffic flow in which speed and freedom of movement are severely restricted by the presence of other vehicles. At signalized intersections, some vehicles may occasionally have to wait for more than one green light in order to pass through the intersection.
E	Represents operating conditions at or near capacity. Individual vehicles have little freedom to maneuver within the traffic stream, and any minor disruptions can cause a breakdown in the flow of traffic. At signalized intersections, vehicles regularly wait for more than one green light to clear the intersection.
F	Represents breakdown conditions. At this level of service, speeds are low, delay is high, and there are more vehicles entering the roadway than can be accommodated.

Source: City of Brawley, General Plan 2008.

Table 4.7-2 ADT Level of Service Volumes by Roadway Types

Roadway Type	Maximum Average Daily Traffic by Level of Service				
	LOS A	LOS B	LOS C	LOS D	LOS E
Expressway	30,000	42,000	60,000	70,000	80,000
Prime Arterial	22,200	37,000	44,600	50,000	57,000
Minor Arterial	14,800	24,700	29,600	33,400	37,000
Collector	13,700	22,800	27,400	30,800	34,200
Local Collector	1,900	4,100	7,100	10,900	16,200
Residential	1	1	<1,500	1	1
Residential Cul-de-Sac or Loop Street	1	1	<200	1	1
Industrial Collector	5,000	10,000	14,000	17,000	20,000
Industrial Local	2,500	5,000	7,000	8,500	10,000

Source: City of Brawley, General Plan 2008

¹ Levels of service are not applied to residential streets because their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

The City of Brawley has established LOS C as a threshold standard to monitor the performance of community roadways. If the ADT on a particular roadway is greater than the traffic levels established for LOS C, the City will determine that the performance of the roadway is unacceptable. When roadway performance is unacceptable, improvements to the roadway will be required to increase the capacity to accommodate greater ADT levels.

4.7.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities

The circulation system within the City is oriented in a north/south and east/west grid system. The City's roadway types include Expressways, Prime Arterials, Minor Arterials, Collectors, Local Collectors, Residential, Industrial Collectors, and Industrial Locals. The City operates and maintains signalized and unsignalized intersections that control the flow of traffic in their circulation system.

The major regional roadway facilities located within City limits include three State Routes: SR- 78, SR-86, and SR-111 operated by the State through Caltrans. SR-111 passes through the southeastern, and northern areas of the City and provides access to areas north and south. SR-86 transects the City to the southwest of the City limits. SR-78 runs in an east/west direction transecting the center of the City. The State Routes represent important regional circulation roadways that affect land use within the City. The City is partially responsible for the relinquished portion for maintaining these highways, upkeep and adequate circulation on such facilities affects traffic throughout the City-operated system.

Main Street is presently the most heavily traveled roadway in Brawley, as analyzed in the Brawley Main Street Plan adopted in 2007. Brawley also experiences substantial truck traffic within the urbanized area due to the City's location at the intersection of SR-78, SR-86, and SR-111. The agricultural sector of Imperial Valley generates a large number of local and regional truck trips.

Ownership and maintenance of local public streets within the City is the responsibility of the City of Brawley Department of Public Works, which has one road maintenance yard located west of SR-111 within the City limits. The City also follows a regular maintenance schedule, which would be applied to streets in the City and annexed areas.

Within the unincorporated area of the SOI, ownership and maintenance of local public roads is the responsibility of Imperial County. Road improvements are installed and inspected according to standards developed by the County Public Works Department. The County does not maintain dedicated local roads on a regular schedule. If the condition of a particular road becomes a non-emergency safety concern, the Public Works Department must first allocate the funds for the repair in the budget for the following fiscal year. In emergency situations, the Brawley road maintenance yard within the City's limits would be assigned to conduct repairs and/or cleanup.

Adequacy of Existing Facilities

The City's current circulation facilities are adequate to meet the need. The following projects have identified that all roadways and intersections will operate at a LOS C or better with mitigation: Final Environmental Impact Report for the Luckey Ranch Annexation to the City of Brawley (November 1999), Final Environmental Impact Report and Initial Study for SDSU Imperial Valley Master Plan Project (July 2003), and Final Environmental Impact Statement/Report for the State Routes 78/111 Brawley Bypass; these projects have been approved and are at various stages of development. There have been no studies completed since the 2018 Service Area Plan to identify

that transportation facilities operate at an acceptable level.

Many of the roads depicted on the Circulation Plan, Figure 4-6, do not currently meet the standards of the roadway designations, and some of the identified components of the circulation system are not yet constructed. Extension of roadways and creation of additional roadways will be needed as development occurs within the City limits and the SOI in partnership with the Imperial County Transportation Commission.

Future Demand for Facilities

As residential, commercial, and industrial development continue within the City boundaries and SOI, the City will need to continue to upgrade and improve existing roadways and create new roadways in order to maintain a service level that is in keeping with the goals established in the City’s Circulation Plan. Existing roads will not be able to accommodate the additional traffic generated by development within the SOI. It is assumed that some level of Circulation Plan improvements will be provided in association with private and public projects, including the SR-78/111 to be constructed by Caltrans and those associated with private development throughout the City, which will be determined on a case by case basis. No additional transportation facilities have been approved or proposed since the preparation of the Infrastructure Element of the General Plan.

The City plans to continue to require developers to construct, at a minimum, street and parkway improvements to City public street standards adjacent to any new development, regardless of the size of the development. New subdivisions are required to construct interior residential and collector streets to City standards at the developer’s expense. Typically, developers of subdivisions must construct all roadways within their project, including perimeter streets to be improved with sidewalks, curbs and gutters, one parking lane, and one travel lane.

The buildout of La Paloma, Luckey Ranch, YK America and other developments are being considered on a project by project basis with a cumulative analysis of environmental impacts to transportation facilities.

Rancho Los Lagos

The Rancho Los Lagos Circulation Plan is designed to complement the Land Use Plan by creating a safe, interconnected system for vehicles and pedestrians. The Land Use Plan features narrow front setbacks, street-oriented buildings, and front porches to promote pedestrian activity and social interaction. The Circulation Plan emphasizes walkable streets with sidewalks, paseos, bicycle facilities, medians, and landscaping, ensuring connectivity to parks and schools. This design encourages a pedestrian-oriented community with easy access to community amenities and recreational opportunities.

The Circulation Plan integrates seamlessly with regional roads, extending Western Avenue south through the Specific Plan area and connecting to regional arterials. This network of new collector roads, such as Jameson Road and Western Avenue, is designed to alleviate traffic from SR 86 while providing regional access. Key roadways like Avenida Del Valle-Benson Road enhance connectivity within and beyond the Plan area.

Proposed roadways include various types to accommodate different traffic volumes and functions, ranging from major thoroughfares like Dogwood and Lavender (Schartz) Roads to residential streets with paseos. The design of these roads considers anticipated traffic volumes and planning

objectives, prioritizing pedestrian safety, efficient vehicle movement, and aesthetic appeal. Narrow lanes and reduced pavement widths on residential streets help lower vehicle speeds, enhancing pedestrian safety. The Circulation Plan includes several roadway types, all of which are strategically designed to accommodate the anticipated vehicular and pedestrian traffic volumes. The following section details the design and engineering standards for these roadways.

Improvements to the arterial roadways and highways surrounding the Rancho Los Lagos Specific Plan are also discussed. See Figure 3-2: Street Design Plan below for the layout of these roadways throughout Rancho Los Lagos. Caltrans is responsible for design, maintenance, and improvements to State Route 86. As such, this roadway is not included in the Rancho Los Lagos Circulation Plan.

Enhanced landscaping, street tree canopies, and pedestrian facilities along roadways contribute to a comfortable, human-scale environment. These features, along with reduced pavement widths, also provide cost savings, reduce stormwater runoff, and mitigate urban heat island effects. Amendments to the Circulation Element of the City of Brawley's General Plan may be required to align the Rancho Los Lagos Specific Plan with the city's goals and regulatory requirements.

LEGEND

- Project Boundary
- Railroad
- Lake/Canal
- Dogwood Road
- Schartz Road
- Jameson Road
- Avenida Del Valle (at Commercial)
- Avenida Del Valle
- Entry Avenue
- Modified Collector Street
- Mid-Volume Residential Street
- Low-Volume Modified Collector Street
- Promenade Street with Paseo
- Promenade Street
- Community Park Street
- Residential Street with Paseo
- Residential Street
- Business Park Street
- Curb Bulb-out Intersections
- Potential Transit Turnout Locations



Source: P&D Consultants in conjunction with EDAW, 2007; 2008; 2009



Figure 3-2
Street Design Plan
Rancho Los Lagos

Path: P:\2006\06261802 Rancho Los Lagos Specific Plan\SGIS\MXD\specific_plan_figures_rev201103\VehiclePlan_rev201103_v5.mxd_03/09/11_Lee

Opportunities for Shared Facilities

In order to maintain the best possible circulation within City limits, throughout the SOI, and within the County and the greater region as a whole, the City will continue to cooperate with the Caltrans, the Southern California Association of Governments (SCAG), and the County to monitor the operation of the regional system and the implementation of necessary improvements. The City will also continue to cooperate with the County and the Imperial Valley Transit Authority to ensure that adequate bus service is available for elderly and disabled persons.

The City will review and comment on environmental documents from the County and nearby cities for new development projects. The City will focus particularly on potential regional transportation impacts and request measures to mitigate traffic impacts on the City and SOI where applicable.

Phasing

Future expansion or construction of additional transportation facilities will be provided in phases. The phasing will be tied to population growth and available fund.

It is assumed that some level of Circulation Plan improvements will be provided in association with private and public projects, including the SR-78/111 to be constructed by Caltrans and those associated with private development throughout the City. As the City develops and traffic levels increase, the City will construct roadway improvements to implement the Circulation Plan. The City has had discussions with Caltrans regarding taking jurisdiction over sections of SR-86 and SR-78. All projects with impacts on Caltrans roadways, including SR-86, SR-78, and SR- 111 will require review and coordination with Caltrans.

To ensure adequate transportation management in future years, the City will implement several programs in addition to the Circulation Plan. The City will require the preparation of a traffic analysis for major development proposals to identify potential impacts on the City’s circulation system and identify necessary physical improvements to maintain LOS C, both for new onsite streets as well as existing offsite streets that will be impacted by project traffic. As traffic volumes approach or exceed LOS C, the City will design improvements to increase the capacity: restriping, restricting on-street parking, improving signal timing, widening intersections, and taking other appropriate measures. The City will also take actions to decrease the demand for vehicular transportation, such as promoting transit service, bicycle, pedestrian, and equestrian facilities.

4.7.3 Funding

Per Capita Costs

Circulation facilities are currently funding through development impact fees, ICTC TDA, the Local Transportation Authority, the state gas tax, Measure D, the State Transportation Improvement Program (STIP), Landscape and Lighting Maintenance Districts (LLMDs), Community Facilities Districts and the California Transportation Commission (CTC). For FY 2023/2024, the Brawley City Council approved an operating budget of \$1,108,955 for transportation facilities. Considering a population of 35,000, the current per capita operating cost is \$31.68.

Future Funding Costs

Projecting the \$31.68 per capita transportation operating cost over the planning period for the SAP, the transportation operating cost would require approximately \$1,801,006 by 2045 to support the projected population of 58,758 residents. This projection is in FY 2024/2045 dollars and does not account for inflation.

Cost Avoidance Opportunities

There are no opportunities to reduce costs.

Recommended Funding/Future Funding Sources

Development impact fees are expected to finance 93.16% of the circulation facilities demands discussed in the DIF Study for future development within the City through 2030. The remaining 6.84% of the circulation facilities discussed in the DIF Study will be funded through other sources. Fair share traffic impact fees as established by the City for equitable funding of transportation improvements off site or under Caltrans authority shall be paid by the project proponent as specified by the Conditions of Approval for the future developments within the SOI. Traffic impact fees commensurate with traffic generated from future project development shall be paid by the project proponent to the satisfaction of the City Engineer as specified in the Conditions of Approval.

Possible funding sources include assessment districts, redevelopment funds, Development Impact Fees, Community Development Block Grants, exactions, and similar financing methods. The City may choose to construct street improvements to rights-of-way linking the study area to other City areas, including widening, resurfacing, realignment, and landscaping. The City will ultimately assume responsibility for maintaining these improvements through Gas Tax funds and the General Fund. Other possibilities are assessment districts and related funding sources. In addition, the City uses Measure D funds for operation and maintenance of local roadways.

4.7.4 Recommendations

In order for the City to maintain adequate circulation and provide roadways that are sound and efficient throughout the City and the SOI, the City will implement the following measures:

- Implement circulation system improvement projects included in the DIF Study as needed by projected future development within the City.
- Maintain LOS C as a threshold standard to monitor the performance of community roadways.
- Require the preparation of a traffic analysis for major development proposals to identify potential impacts on the City’s circulation system and identify necessary physical improvements to maintain LOS C, both for new onsite streets as well as existing offsite streets that will be impacted by project traffic.
- As traffic volumes approach or exceed LOS C, Design improvements to increase the capacity – restriping, restricting on-street parking, improving signal timing, widening intersections, and taking other appropriate measures.
- Take actions to decrease the demand for vehicular transportation, such as promoting transit service, bicycle, pedestrian, and equestrian facilities.

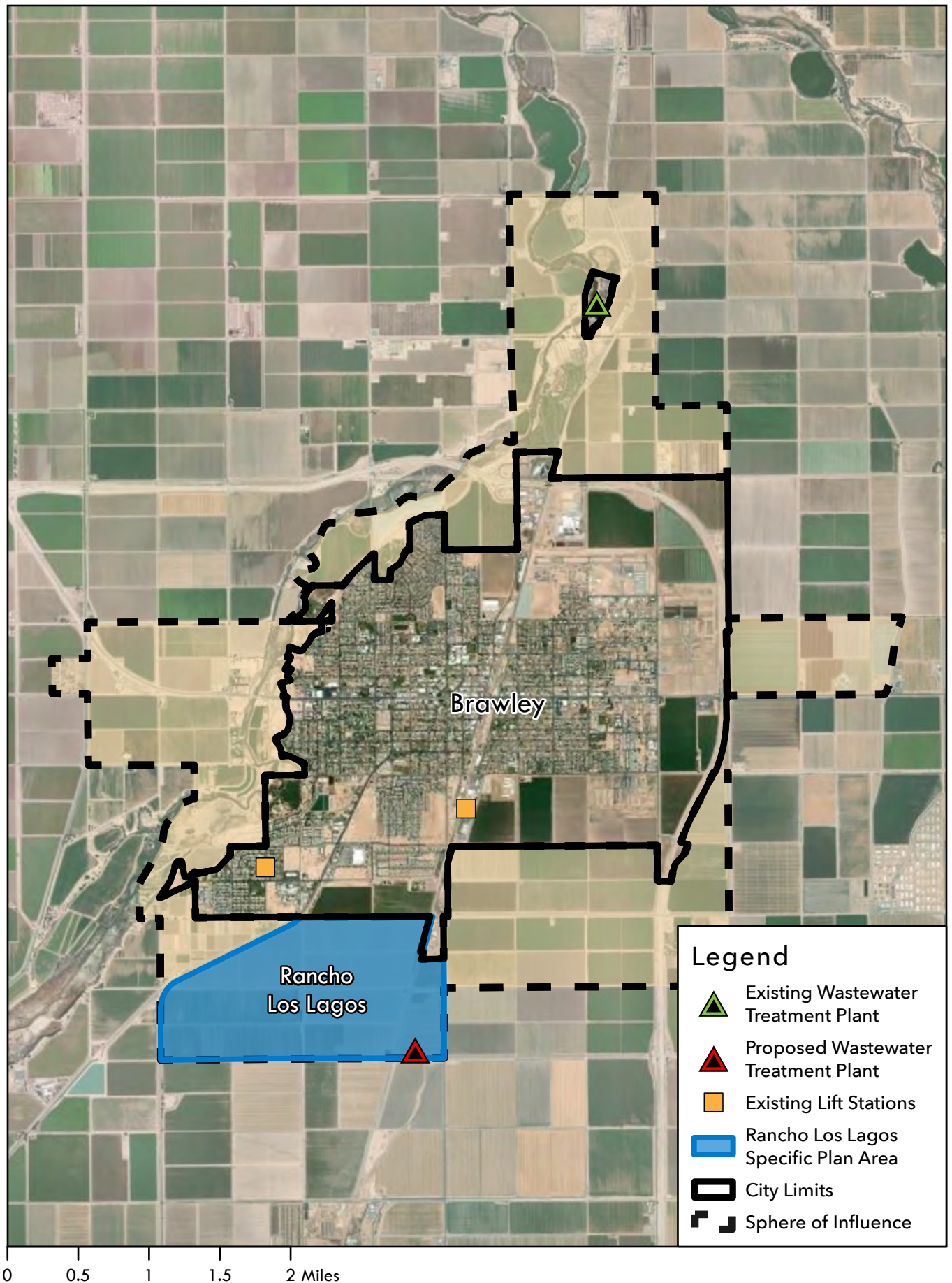


Figure 4-7
Wastewater Treatment Facilities

4.8 WASTEWATER FACILITIES

The City of Brawley provides wastewater collection, treatment, and disposal services for residential, commercial, and industrial uses. The City Public Works Department plans, constructs, and maintains the sewage system. The system includes a collection network of pipes and a wastewater treatment plant (WWTP).

The City adopted its Wastewater Master Plan in 2013. Existing and projected wastewater needs in this analysis are based on coordination with City staff and the CIP for FY 2023/2024. A copy of the current Wastewater Master Plan (2013) is available at the City for review.

4.8.1 Performance Standards

Performance standards for operation of the City's WWTP are based on compliance with discharge requirements of the California Regional Water Quality Control Board (RWQCB) Colorado River Basin Region 7. The State Water Resources Control Board (SWRCB) sets a performance standard for wastewater facilities not to exceed 85% capacity. The City is planning to develop an update to the existing Wastewater Master Plan in 2026, which will include a plan for the facility to meet anticipated flows through the years of 2040.

Performance standards for new development are founded on providing adequate collection systems based on evaluation of the capacity needs for proposed residential and other land uses, which is specified in the Wastewater Master Plan. Wastewater average daily flows and projected daily capacity of the WWTP are shown below in Table 4.8.1 based on projected population through 2045. Projected Average Daily Flows were calculated using the assumption of 77 GPD/Person, which was determined in the 2013 Wastewater Master Plan. Future flows and capacity will be updated by the 2026 Master Plan, once adopted.

Table 4.8-1 Existing and Projected Wastewater Flow and Capacity

Year	Projected Population	Projected Average Daily Flow	Projected Average Daily WWTP Capacity
2024	35,000	2.7 MGD ¹	5.9 MGD
2045	58,758	4.5 MGD	5.9 MGD + 1.0 MGD (RLL WWTP)

¹ MGD = million gallons per day

4.8.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities

The City's wastewater collection system is a gravity flow system. The majority (approximately half) of the system is a combined sanitary and storm sewer system. Figure 4-7: Wastewater Treatment Facilities shows the location of the City's existing lift stations and wastewater treatment plants. These facilities connect to the City's main wastewater collection lines, which are generally 10 inches and larger in size and convey wastewater flows from south to north. Smaller lines, 6 and 8 inches in size, flow primarily east and west and are located in virtually every east-west street in the City. As indicated in the 2013 Wastewater Master Plan, the existing system includes approximately 77 miles (406,560 linear feet) of wastewater collection lines ranging from 6 to 30 inches, and 2.1 miles of force mains.

The existing WWTP is located in the southwestern portion of the City and is operated by six (6) employees. The total design capacity of the wastewater treatment plant is 5.9MGD. The WWTP provides secondary treatment through a Biolac® activated sludge treatment system that was brought online in December 2011. The treatment system is comprised of three Biolac® activated sludge treatment units equipped with air diffusers, three secondary clarifiers, an activated sludge pumping stations, ultraviolet disinfection, and sludge processing facilities. The Discharger has converted one of the inactive primary clarifiers into a sludge thickening unit and the other inactive primary clarifier into a sludge holding tank. Waste activated sludge is thickened in a sludge thickening unit, dewatered in a centrifuge sludge dewatering unit, and then dried using solar greenhouse sludge drying structure. The Biolac® process operates without primary treatment; therefore, no primary sludge is produced during the treatment process. All of the wastewater collectors and mains flow to the City's WWTP, which process the effluent and discharge the treated water into the New River.

The City also operates several lift stations, which primarily include the South Brawley Sewage Lift Station No. 1, the Citrus View Sewage Lift Station No. 2, and the Latigo Sewage Lift Station No. 3, which pump wastewater into nearby gravity sewers. Smaller lift stations have also been constructed privately to serve larger developments, such as the Wal-Mart and Los Olivos lift stations; however these stations are not operated by the City of Brawley. Lift Station No. 1 was designed in 1988 as part of the Southwest Brawley Sewer Improvements Project and is located south of Malan Street and east of Dogwood Road and the Union Pacific Railroad. One 10-inch force main conveys flow from Lift Station No. 1 east and north to the WWTP. Lift Station No. 2 was designed in 1989 to serve the subdivision of Citrus View and is located in the southwestern part of the City, on the east side of Richard Avenue between Ronald and Steven Streets. The Citrus View area in the City of Brawley has independent sanitary and storm sewer systems; therefore, stormwater flows are not discharged to the wastewater collection system or the lift station. Since the lift stations were constructed, development in the areas that contribute flow to the lift stations has increased the discharge into the collection system.

Adequacy of Existing Facilities

Approximately half of the municipal wastewater and drainage collection systems are combined in the City of Brawley. Consequently, drainage water is treated at the WWTP and accounts for a substantial part of the treatment plant operation load. To prevent sewage spills during unusual rain events, an overflow basin has been constructed to reduce the amount of overflow. The capacity of the sewers is adequate under normal dry weather conditions.

The capacity of the existing WWTP is 5.9 MGD, which is more than the estimated average daily flow of 3.84 MGD. According to City staff, the current WWTP treats about 65% of the maximum design capacity depending upon influent flow rates, and per the RWCQB was not in need of additional capacity to accommodate existing development. Several wastewater sewer lines were over capacity in 2017, which are combined with the drainage collection systems. Wastewater lines in most need of improvement are in the Wastewater Master Plan. According to City staff, additional operators would be beneficial for operational performance of the facilities.

In 2023, the maximum monthly flow for the wastewater system was recorded at 3.5 million gallons per day (MGD), with an average annual flow of 3.2 MGD. Additionally, the current average generation from City wastewater customers stands at 3.2 MGD, with a peak flow of 4 MGD, meeting Secondary Treatment standards. Projections for Average Daily Flow (ADF) are calculated based on historical data and percentages of development construction costs, utilizing two methods:

Future value ADF, determined by assumed future growth rates, and Present Value, estimating ADF using present-day data and populations for the 2026 wastewater master plan.

Future Demand for Facilities

In 2045, the projected population of 58,758 residents will create a sewer demand of 4.5 MGD; with the construction of the 1.0 MGD Rancho Los Lagos Wastewater Treatment Plant (RLL WWTP), the total capacity will increase to 6.9 MGD, meeting the State Water Quality Board (SWQB) performance standard of not exceeding 85% capacity.

Projected average daily flows and future wastewater facility demands until the year 2030 are provided in the City's 2013 Wastewater Master Plan identified the following wastewater improvements:

- Lift Station No. 1 & 2 Upgrades
- 8th Street Line Replacement
- Annual Manhole Rehabilitation
- Small Dump Truck Acquisition
- Sanitary Sewer Management Plan
- Backhoe Acquisition
- Vehicle Acquisition
- WWTP Expansion
- City Wide Sewer Line Replacements and Upgrades
- WWTP Tertiary Treatment Project
- Annual Sewer Video Inspections
- Adler Sewer Main Replacement
- Cattle Call Park Sewer Lift Station
- Annual sewer cleaning program
- North Imperial Storm Drain Extension
- Pat Williams Storm Drainage Extension
- Best Road Storm Drain North of Jones
- Best Road Storm Drain from Malan to Main
- Annual Storm Drain Inlet Rehabilitation
- Reconstruction of Storm Drain Inlets at Various Locations
- Rio Vista Storm Drain Improvements

According to City staff, none of these improvements have been completed. The 2026 Wastewater Master Plan will re-evaluate the wastewater system recommend proposed improvements through 2040 which will optimize the efficacy and conveyance of wastewater throughout the City.

Rancho Los Lagos

The build out average daily flow for RLL is estimated to be nearly 0.83 MGD. To meet the anticipated future demand for wastewater facilities and conveyance services, an extensive planning and adequacy analysis was conducted for Rancho Los Lagos (RLL), taking into

consideration planned land use types and projected flow estimates. Proposed facilities were sized based on hydraulic analysis and design standards, with adjustments made according to current phasing plans. Approved plans entail the construction of nearly 21 miles of gravity sewer line, about two miles of force main, and four lift stations due to the flat topography. A wastewater treatment plant (WWTP) capable of treating up to 1.0 MGD (million gallons per day) is proposed, designed to meet stringent regulations and equipped with tertiary treatment for recycled water use. The build-out average daily flow is estimated to be nearly 0.83 MGD. Drainage infrastructure development will adequately accommodate increasing demand while ensuring compliance with state and local regulations.

Given the impact of development and growth on the wastewater treatment plant (WWTP) and collection system, the City plans to expand or provide additional wastewater treatment and sewer facilities or personnel in the future to accommodate anticipated population growth. For more detailed information on the water facilities, see the appendix for the Rancho Los Lagos Water Service Area Plan (SAP).

Opportunities for Shared Facilities

The City does not share wastewater treatment, storage, or distribution facilities with other jurisdictions. RLL has the City of Brawley to the north and undeveloped property on the neighboring sides. Just south of RLL is a proposed development known as 101 Ranch which will have a wastewater flow of at least 130 percent of RLL. With the WWTP and large gravity trunk lines on the southern boundary of RLL, there may be opportunities for 101 Ranch to utilize the DOLL's wastewater facilities. A study was conducted in October of 2015 by Albert A. Webb Associates entitled Rancho Los Lagos Cost Analysis for Water and Sewer Options. The study looked at the option of utilizing the City of Brawley wastewater facilities and found that there was little excess capacity without extensive upgrades to the conveyance system. There may, however, be opportunities for the City of Brawley to pump some wastewater flows to RLL should the need arise. Wastewater flows from sources outside of the RLL development were not accounted for in the sizing of proposed facilities.

Phasing

The City is currently working on expanding its infrastructure and has continuously been working on infrastructure projects since the year 2000. The future expansion or construction of additional wastewater facilities will indeed be provided in phases, with the phasing closely tied to factors such as population growth and available funds. Near-term capital improvements will undergo updates every 5 years, while long-term capital improvements will be reviewed and updated every 10 years. As noted above, the CIP identifies future improvements for a five-year period from FY 2023/2024 and FY 2027/2028 related to wastewater services, and specifies anticipated projects for each fiscal year. The estimated totals allocated for the City Wastewater Fund is \$2,268,971.

Rancho Los Lagos

Just under 21 miles of gravity sewer line will be required and nearly two miles of force main. The topography of RLL is essentially flat, four lift stations are required for wastewater conveyance. The proposed wastewater treatment plant (WWTP) will need to be capable of treating nearly 1.0 MGD. However, it will take several years for RLL to reach the build out condition so the treatment plant is proposed to be built in stages. A detailed design of the WWTP has yet to be prepared but the WWTP is expected to meet the Title 22 Reuse Treatment Regulations (California Code of Regulations), the California Department of Health Services, and Local Agency requirements.

The RLL property currently comprises agricultural fields slated for farming until each phase of development progresses. The plan entails three phases for RLL with build-out expected to span several decades. An interim condition is proposed for Phase 2, potentially serving as a Recreation Vehicle Park before residential construction, with flows expected to be lower than those of the eventual residential lots, thus necessitating no changes to facility sizes. Sewer lines will be strategically placed in ultimate street alignments to minimize future facility relocation. Phased development of the wastewater treatment plant (WWTP), ensuring treatment capacity exceeds 135 percent of existing average day flows until the final phase. Ongoing flow monitoring at the WWTP will inform future projections, enabling accurate sizing of treatment and lift station facilities to meet evolving development needs.

4.8.3 Funding

Current Funding

The City continues to receive wastewater treatment and sewer facilities funding primarily from user monthly fees, which remain the largest source of revenue. Additionally, the City currently uses user fees and Impact Fees for both operation and infrastructure projects related to wastewater facilities. However, the City has not yet completed a review of the wastewater rate and finance structure, as a Water/Wastewater rate study is still pending.

The City of Brawley Public Works Department charges users monthly fees for wastewater services. A substantial amount of the user fees also pay for debt financing that was required to construct existing facilities.

The City employs a variety of funding sources, including grants, developer impact fees, community facilities districts, and alternative measures, as outlined in Section 8 of the 2013 Wastewater Master Plan, to support the funding of Wastewater Facilities.

Per Capita Costs

For FY 2023/2024, the Brawley City Council approved an operating budget of \$7,066,560 for wastewater collection and treatment services. Considering a City population of 35,000, the current per capita operating cost is approximately \$201.90.

Future Funding Costs

Projecting the \$201.90 per capita operating cost over the planning period for the SAP, the wastewater collection and treatment services operating costs would require approximately \$9,493,742 by 2045 to support the projected population of 47,002 residents. This projection is in FY 2023/2024 dollars and does not account for inflation.

Cost Avoidance Opportunities

There are no cost avoidance opportunities.

Recommended Funding/Future Funding Sources

New developments are responsible for adding or upgrading infrastructure, if needed, as discussed in the 2013 Wastewater Master Plan. Future project proponents will be responsible for the costs of the sewer infrastructure within and directly benefiting their project within the SOI. This

infrastructure may include sewer laterals connected to new structures, collection mains with manholes, pump stations, and forced mains, if required, all of which collect sewage directly from the respective study areas. Recommended funding sources include the Border Environment Infrastructure Funding (BEIF) from the Border Environment Commission.

Currently, only 2% of the Development Impact Fees (DIFs) are allocated for wastewater facility improvements. A new DIF study is needed to reassess this allocation for future demands through 2045. The City is planning to update the Development Impact Fee (DIF) Study in FY 2024/2025, which will incorporate these projected demand totals and supply figures. This updated study will provide data to accurately assess the impact of new developments on water demand and ensure that future funding sources, such as revised DIFs, align with the anticipated infrastructure needs.

Rancho Los Lagos (RLL)

The primary sources of revenue for wastewater treatment and conveyance facilities encompass sewer service charges, sewer capacity fees, and sewer connection fees, with the latter based on the equivalent dwelling unit (EDU) impact to fund future expansions of RLL's WWTP. Rancho Los Lagos, LLC will undertake much of the proposed sewer infrastructure's construction and funding for each development phase. RLL intends to utilize these funding sources alongside exploring additional avenues to develop the proposed sewer system effectively. Sewer service charges collected by RLL will serve as the predominant funding source, calculated based on EDUs. These fees require annual review and evaluation prior to future tie-in connections to ensure sufficient funding for wastewater service provisions to new developments.

Various financing mechanisms are available to support capital facilities for wastewater conveyance and treatment. These include special assessment districts, community facilities districts, local bond issuance, developer contributions, and development impact fees. Additionally, State and Federal grant and loan programs such as USDA Water and Waste Disposal Loans and Grants for Public Works and Infrastructure Development offer potential sources of funding. Detailed descriptions of these financing methods are provided in the Financing Section of this report.

As outlined in the Imperial County Development Agreement:

"In the preferred alternative, developers/project applicants are responsible for their fair share of all costs associated with the creation and implementation of the proposed Community Service Area (CSA), including planning, design, site acquisition, and permitting of Water Treatment Plants (WTP) and Wastewater Treatment Plants (WWTP). This Fair Share must be reimbursed to the appropriate agency prior to issuing the Certificate of Occupancy for the First House within the First Final Map." "If the WWTP or WTP is constructed, developers/project applicants will contribute their fair share of construction costs based on the phase noted for recordation before recording the Phased Final Map for that phase."

A portion of capital expenditures will be financed through Development Fees collected by the County on behalf of the Service District, as stipulated in Exhibit D of the Imperial County Development Agreement Concerning Rancho Los Lagos Project approved on December 13, 2016. Additionally, future Community Facilities Districts and phased Melo-Roos bonds will be utilized to help finance capital expenditures.

4.8.4 Recommendations

In order for the City to assure adequate service to its wastewater customers as development continues within the City boundaries and within the SOI, the City will implement the following measures.

- Implement improvement projects in the Wastewater Master Plan and the DIF Study as funds become available and as deemed necessary by the Director of the Department of Public Works.
- Ensure that the City's WWTP operation is in compliance with discharge requirements of the RWQCB.
- Require new developments to provide mitigation on a per-project basis.
- Facilities identified in the 2017 Wastewater Master Plan shall be constructed as needed as phases are developed.
- Prior to any development outside of RLL boundary tying into RLL's proposed wastewater facilities, a detailed engineering study shall be prepared and a will serve letter shall be in place to ensure that adequate wastewater facilities will be provided for the wastewater collection systems being utilized by outside development(s).
- All system improvements shall be designed and constructed in accordance to federal, state, and local regulations.
- RLL shall reevaluate their development impact fees (at least every five years).

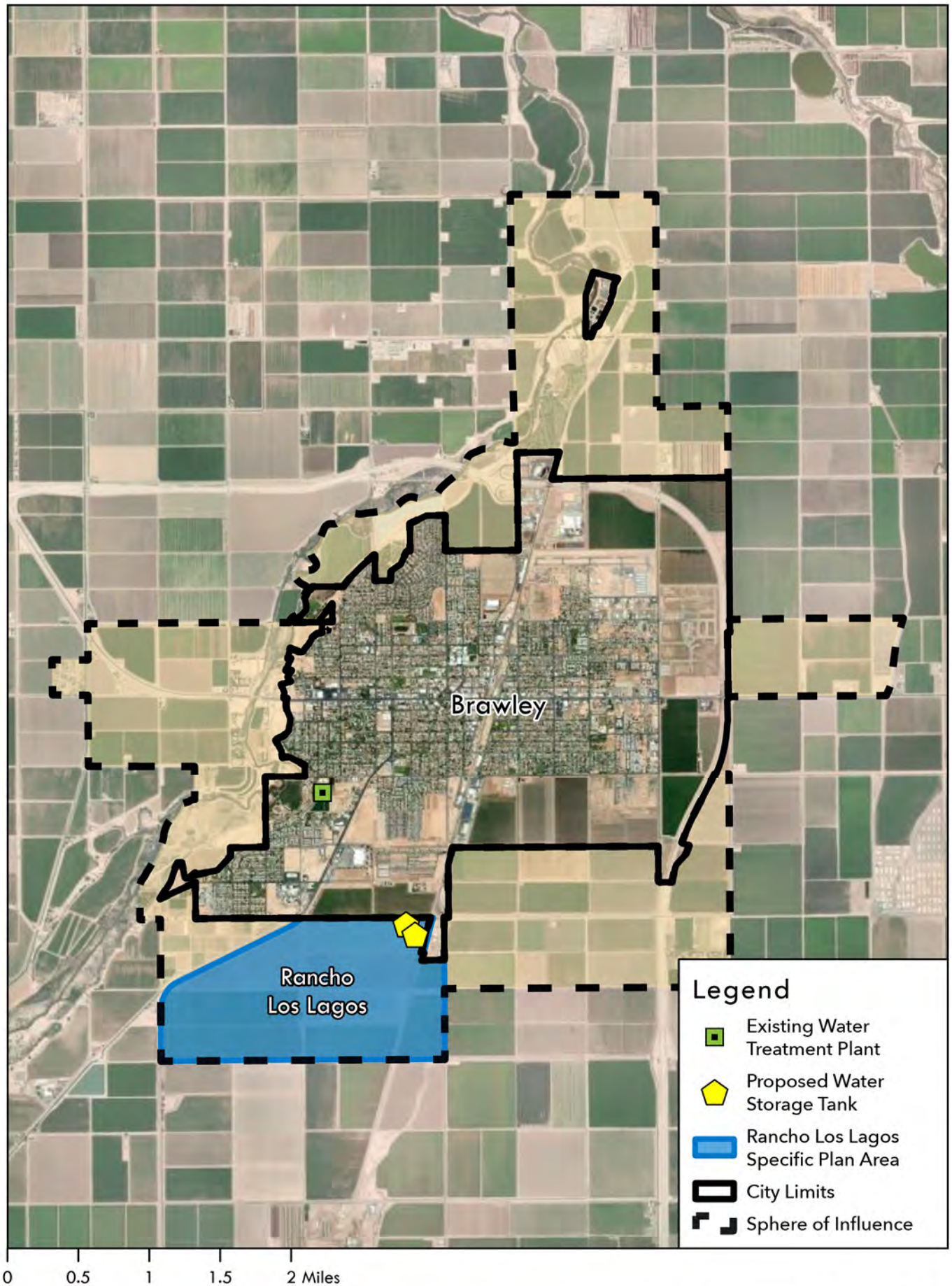


Figure 4-8
Water Treatment Facilities

This page intentionally left blank.

4.9 WATER FACILITIES

The City of Brawley provides potable water treatment and distribution within the City limits and SOI boundaries; and the Public Works Department plans, constructs, and maintains the water system. The City purchases raw imported Colorado River water from the IID, which delivers the raw water to the City via IID-owned and operated canals—the Mansfield and Central Main Canals. Untreated water to be used for agricultural purposes is delivered to customers directly from the IID canal systems, while water to be used for domestic and industrial/commercial purposes is delivered to the City of Brawley’s Water Treatment Plant (WTP), where the water is filtered and disinfected before it is pumped into the water distribution system. The City operates a single pressure zone and, as of 2020, provides potable water to around 6,100 service connections. The current Water Treatment Plant (WTP) is authorized to treat up to 15 million gallons per day (MGD) to meet peak daily demand, though it has a hydraulic capacity of 22.5 MGD. The plant is designed to be expandable to 30 MGD for future growth. The City last updated its Water Master Plan in 2012. In compliance with the Urban Water Management Planning Act, the City of Brawley developed the 2020 Urban Water Management Plan (2020 UWMP). This plan, mandated by sections 10610 through 10657 of the California Water Code (CWC), Division 6, Part 2.6, incorporates the conservation measures, programs, and policies required by urban water suppliers for reporting to the CA Department of Water Resources. Each urban water supplier is required to assess current demands and supplies over a 20-year planning horizon and consider various drought scenarios to ensure that conservation and efficient use of water resources be actively pursued. Findings from this effort will be used to inform the future demands on supply and capacity for water treatment for potable water.

4.9.1 Performance Standards

In general, the City’s performance goal in the operation and maintenance of its water facilities is to provide adequate potable water service to every customer. Potable water must meet or exceed water quality standards promulgated by the State Water Board. Additionally, storage is required in a system to help stabilize flows and pressures and ensure consistent service, as well as to provide for emergency conditions such as fighting fires, facility repairs, etc. The minimum volume of storage available to a water distribution system typically includes both operational and contingency storage. The 2012 Water Master Plan did not establish storage criteria and instead used the City of San Diego’s storage criteria, which requires ground-level storage to equal 50% of the system’s maximum day demand (MDD).

Table 4.9.1 compares the water system’s capacity and demand comparison to provide supply projections over the next 20 years. Existing WTP permitted capacity is 15 MGD or 5,475 Million Gallons per year. Supply data is based on 90% volume of WTP’s capacity, 4,928 MGD.

Table 4.9-1 Water System Supply and Demand

	2025	2030	2035	2040	2045
Supply totals	4,928	4,928	4,928	4,928	4,928
Demand totals	2,251	2,335	2,421	2,511	2,606
Difference	2,676	2,593	2,507	2,417	2,322

MGD = million gallons per day
 Source: City of Brawley Urban Water Management Plan

4.9.2 Facility Planning and Adequacy Analysis

Inventory of Existing Facilities

The existing water distribution system consists of one water treatment plant, three separate storage facilities, two pump stations, and approximately 112 miles of 4- to 24-inch water mains. The existing water system is depicted on Figure 4-8: Water Treatment Facilities. In 1999, the City completed construction of a new water treatment plant to alleviate capacity problems that were occurring at the old water treatment plant, which is no longer in use.

The water treatment plant includes the following:

- A 15-MGD capacity and hydraulic capacity of 22.5 MGD, which provides adequate space for expansion to 30 MGD and is located on Cotton Rosser Drive to the west of SR-86, approximately 0.5 miles to the south of the old water treatment plant.

The existing storage facilities include the following:

- 2-MG grade level reservoirs located at the water treatment plant on 760 Cotton Rosser Drive
- 3-MG grade-level steel reservoir located just north of the airport.

The existing pump stations include the following:

- The first station is located just south of the airport.
- The 1999 Pump Station includes 6 MG of finished water storage and five equal sized pumps and is located on Cotton Rosser Drive to the west of SR-86, located south of the existing water treatment plant.

The City's water mains range in diameter from 4 to 24 inches and are constructed of either cast iron (CI), asbestos cement (AC), or polyvinyl chloride (PVC). The CI pipes are the oldest and account for roughly 39% of the water mains and were installed until the 1960s. The AC pipes account for approximately 41% of the water mains and were installed through the 1960s and 1970s. The PVC pipes account for 20% of the water mains and represent the material of choice since the 1980s.

The existing facilities as indicated by City staff include the following:

Table 4.9-2 Existing Water Facilities

Existing Resource	Existing Amount
Water Main Improvements	112 miles
Water Treatment Plant	1
3-MG Finish Water Storage Reservoirs	3
Raw Water Reservoir	2
Pond Lining	4
Communication Radio System	2
Trucks	5
Forklift	1
Finish Water Pump Station	1
Booster Water Pump Station	1

Adequacy of Existing Facilities

The City last updated their Water Master Plan in 2012. The City has experienced several failures in the existing CI pipes due to corrosion. City personnel have indicated that in some instances where the CI pipe was removed, the pipe's interior diameter was less than half of what was originally installed. The alkaline soils in the Imperial Valley attack the pipe from the exterior and the alkaline water attacks from within. Some of the CI pipes have been in service for over 65 years, with newer CI pipes being in service for over 30 years. The pipes that have been replaced show extensive encrustation on the pipe interior due to salt build up. Due to corrosion, the capacity of the CI pipes is roughly 50% of AC or PVC pipes. This difference also equates to greater pressure loss and lower reliability for hour and fire flows. As a result, the CI pipe C-factor used for model calibration is 100, compared to C-factors for the newer AC and PVC pipe of 140 and 150, respectively.

According to City staff, the City's average daily flow is 4.84 million gallons per day. The water treatment plant has a current capacity of 15 million gallons per day. The peak flow during the summer has been as high as 11.8 million gallons per day. In addition, it's expected that the average daily flow will diminish as the City implements the reading of the water meters.

The 2012 Water Master Plan explains that the existing distribution system is not capable of meeting user demands. To provide adequate pressures to meet existing user demands, the following needed improvements are listed below. The City intends to make the modifications listed below as new development occurs.

- Replacing all existing 4-, 6-, and 8-inch CI pipe with 8-inch PVC minimum. All larger diameter CI pipes should be replaced with same size PVC pipe.
- Replacing all CI pipes in a commercial or industrial zone with 12-inch PVC.
- Increasing the existing 8-inch AC pipe with 12-inch PVC in Malan Street from Eastern Avenue to Best Road and in Best Road from Malan Street to Jones Street.
- Replacing the 6-inch AC in River Drive near SR-111 and in SR-111 north of River Drive with 12-inch PVC.
- Replacing the 6-inch AC in the vicinity of the airport with 12-inch PVC.
- Replacing the 6-inch AC in the residential area of Duarte, Rubio, Jones, and Trail Streets near the airport with 12-inch PVC.

The Existing Water Treatment Plant, with a permitted capacity of 15 MGD, meets the storage criteria by providing sufficient capacity to meet the maximum daily demand of 8.81 MGD (recorded on 07/29/2023), and ensuring that ground-level storage can accommodate at least 50% of this demand, which is 4.405 MGD. The maximum peak flow for the year 2023 was 13.26 MGD according to SCADA records, with spike flows often occurring during the startup and shutdown procedures of pumping equipment.

A total of 8 full-time personnel work to operate and maintain the water treatment plant and conveyance system, 5 operators, 1 maintenance technician, 1 chief and 1 assistant chief. According to City staff, this workforce is adequate to operate and maintain the water facilities. The City has not updated the Water Master Plan since 2012. In order to adequately address necessary water improvements, it is crucial to conduct a comprehensive review and revision of the plan to incorporate current data, technology advancements, and projected future demands.

Future Demand for Facilities

The storage criteria requires ground-level storage to equal 50% of the system's maximum day demand and will be comfortably met when compared to future demand projections. In 2025, with a supply total of 4,928 MGD and a demand total of 2,251 MGD, the system has an excess capacity of 2,676 MGD. Even by 2045, with an anticipated demand of 2,606 MGD, the surplus capacity remains substantial at 2,322 MGD. This indicates that the existing storage infrastructure will be more than adequate to handle the projected increases in demand through 2045.

The City has not experienced the level of growth projected in the 2012 Master Plan, resulting in current water capacity, including storage facilities and pump stations, being sufficient to meet existing demand conditions. Adhering to the 2012 Master Plan's recommendation to enhance water quality, the airport has been operating continuously on a 24/7 basis, maintaining an average water pressure of 60-62 psi. This consistent operation ensures reliable service and meets the quality standards set forth in the plan.

Input from City staff and the five-year Capital Improvement Program (CIP) for FY 2023/2024 through FY 2027/2028 identified the following future water improvements:

- Rehabilitation of 2 VFD Blowers for backwash filters
- Utility Vehicle for Water Treatment Plant
- Asphalt Concrete Paving at Water Treatment Plant Exterior
- Rehabilitation of Finish Water Reservoir

Rancho Los Lagos (RLL)

The buildout average day demand for RLL is estimated to be about 1.55 MGD. The proposed water facilities will operate in one pressure zone which is sustained by pumping only. Because the topography is essentially flat throughout the development, there are no reservoirs in the system that can provide a hydraulic gradient to sustain even the minimum pressures required by users. Hence, the system will be considered a closed system. According to the Water Supply Assessment dated July 15, 2008, the RLL land is currently used for agriculture, which has a higher water demand than the proposed developed property. Developing RLL will decrease the annual water usage for the project area by 35%. For more detailed information on the water facilities, see the appendix for the Rancho Los Lagos Water Service Area Plan (SAP).

Opportunities for Shared Facilities

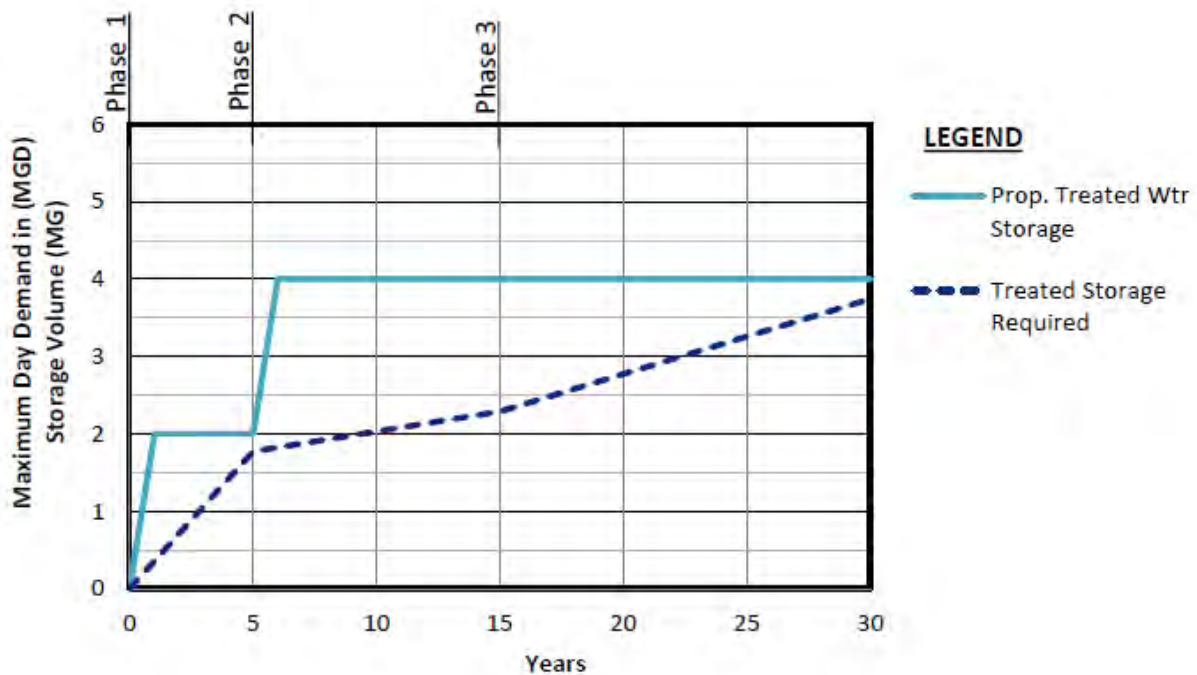
Rancho Los Lagos (RLL) is situated with the City of Brawley to the north and undeveloped land surrounding its other sides. Just south of RLL, a proposed development named 101 Ranch is anticipated to have a water demand at least 130% of RLL's current needs. A 12-inch diameter waterline is being planned for installation on the south end of RLL along Schartz Road, presenting an opportunity for shared infrastructure. RLL aims to collaborate with the City of Brawley by becoming a wholesale customer, installing meters near the development's northern boundary. The City has stipulated that RLL must contribute funding towards future raw storage basins to utilize the City's surface water treatment plant facilities effectively.

Phasing

The City has not experienced the anticipated growth projected in the 2012 Master Plan. As a result, the current water capacity, encompassing both storage facilities and pump stations, remains adequate to meet existing demand conditions. Consequently, any new developments will be closely linked to actual population growth, the availability of funds, and other critical resources. Phasing of these developments will be meticulously planned to ensure that infrastructure expansion aligns with real-time needs and financial feasibility. This approach guarantees that the City can maintain high standards of service without overextending its resources or compromising water quality and availability for its residents.

A 2.0 MG storage tank along with a 4,700 gpm booster pump station is proposed as part of Phase 1 at the northeastern corner of RLL. Two points of connection (POC's) to the City's existing water distribution are proposed. The first POC is proposed through a 16-inch diameter line in Western Avenue which will connect to the existing 12-inch diameter line in Wildcat Drive. As demands increase with construction of additional phases, an additional 2.0 MG storage tank and 16-inch diameter waterline through Dogwood Road to the existing 24-inch diameter waterline in Malan Street (POC2) will be installed.

Currently, RLL consists of agricultural fields designated for farming until each phase of the development gradually replaces the farmland. RLL is planned to be developed in three phases, detailed in the following figure. The build-out of RLL is expected to span several decades. These projections for growth are informed by historical patterns observed in the surrounding area and are closely linked to the local economy. However, significant deviations from these projections may occur in response to major economic fluctuation and are ultimately based on market demand.



4.9.3 Funding

Current Funding

The City of Brawley has transitioned from charging a flat rate for water use to implementing metered billing for both residential and approximately 100 commercial accounts. Despite the installation of approximately 4,300 meters across the city, the rate structure has not yet been adjusted to correspond with actual water consumption. This method has not optimized revenue collection based on usage. Costs associated with water distribution systems in new developments are borne by developers as part of project phasing plans. Developers are responsible for financing infrastructure such as storage facilities, pumps, water mains, and distribution pipelines needed to supply water directly to their projects. Additionally, developers may need to construct distribution mains connecting their projects to the 2012 Water Treatment Plant, with routing determined by the Department of Public Works. Reimbursement agreements may be established if infrastructure built by developers benefits other property owners.

Funding for water system capital improvements primarily comes from user charges, property taxes, capital facility charges, capital reserve funds, interest earnings, and external financing. User charges are structured under established rate schedules designed to cover service costs and encourage water conservation. Capital facility charges, such as connection and extension fees, are applied to new customers requesting service to offset the projected impact on existing system capacity, in accordance with state regulations.

Per Capita Costs

For FY 2024/2025, the Brawley City Council approved an operating budget of \$7,425,245 for water treatment and distribution services. Considering a City population of 35,000, according to City staff estimate, the current per capita operating cost is approximately \$212.15.

Future Funding Costs

Projecting the \$212.15 per capita water treatment and distribution services operating cost over the planning period for the SAP, the water treatment and distribution services operating cost would require approximately \$9,975,711 by 2045 to support the projected population of 47,022 residents. This projection is in FY 2024/2025 dollars and does not account for inflation.

Cost Avoidance Opportunities

There are no cost avoidance opportunities.

Recommended Funding/Future Funding Sources

The City will pursue and grants available. The primary sources of revenue for water distribution facilities include water service charges, water capacity fees, and water connection fees. Much of the proposed water infrastructure will be developed and funded by each phase's developer. Rancho Los Lagos (RLL) intends to utilize these funding sources along with exploring additional avenues to construct the proposed water system. Water service charges collected by RLL will primarily fund maintenance and operational expenses, calculated based on actual water usage. It is essential to review these fees annually and before future tie-in connections to ensure adequate funding for water service provision.

Various financing mechanisms are available to support capital facilities for potable water delivery. These include special assessment districts, community facilities districts, local bond issuance, developer contributions, and development impact fees. Additionally, State and Federal grant and loan programs such as USDA Water and Waste Disposal Loans and Grants for Public Works and Infrastructure Development can provide further financial assistance. Detailed descriptions of these financing methods are provided in the Financing Section.

According to the Imperial County Development Agreement: "In the preferred alternative, developers/project applicants are responsible for their fair share of all costs associated with the creation and implementation of the proposed Community Service Area (CSA), including planning, design, site acquisition, and permitting of Water Treatment Plants (WTP) and Wastewater Treatment Plants (WWTP). This Fair Share must be reimbursed to the appropriate agency prior to issuing the Certificate of Occupancy for the First House within the First Final Map." "If the WWTP or WTP is constructed, developers/project applicants will contribute their fair share of construction costs based on the phase noted for recordation before recording the Phased Final Map for that phase."

A portion of capital expenditures will be financed through Development Fees collected by the County on behalf of the Service District, as stipulated in the Imperial County Development Agreement concerning the Rancho Los Lagos Project approved on December 13, 2016. Additionally, future Community Facilities Districts and phased Melo-Roos bonds will be utilized to help finance capital expenditures. In terms of grant funding, the City has not identified any additional sources beyond American Rescue Plan Act (ARPA) funding, reserves, and Development Impact Fee (DIF) revenues, as recommended in the 2018 SAP, to support water infrastructure projects.

4.9.4 Recommendations

In order for the City to assure adequate service to its water customers as development continues within the City boundaries and within the SOI, the City will implement the following measures.

- Implement improvement projects recommended in the Water Master Plan and the DIF Study, prioritizing those critical to addressing existing infrastructure deficiencies and meeting future demand projections as funding becomes available and as deemed necessary by the Director of the Department of Public Works.
- Require water meters on all new construction and development, and consider implementing a program to install meters on all existing water services to accurately measure consumption and promote water conservation efforts.
- Continue to periodically review the water rate and financing structure to ensure adequate funding for the implementation of new projects and the maintenance of existing facilities, aligning with sustainable financial planning and operational needs.
- Promote water conservation by requiring all new developments to install low-flow showers and toilets, and explore the implementation of a low-flow replacement program for existing facilities to enhance efficiency and reduce water consumption.
- Enforce the no oil and grease policy to protect water quality and prevent

contamination of the water distribution system, ensuring compliance with environmental regulations.

- Require that system improvements, whether conducted by the City or private developers, adhere strictly to relevant Federal, State, and local regulations to ensure compliance and uphold water quality standards.
- Construct facilities identified in the 2017 Water Master Plan as phases are developed, with adjustments made as needed to align with current phasing plans and infrastructure requirements.
- Prior to any development outside of RLL boundary tying into RLL's proposed water facilities, ensure a detailed engineering study is prepared and a will-serve letter is in place. This ensures adequate water facilities are provided during Maximum Operating Demand (MOD), fire, and Peak Hour Operation (PHO) conditions for water distribution systems utilized by outside developments.
- Provide adequate fire flow for all structures proposed, subject to approval by the fire department, to ensure safety and regulatory compliance.
- Ensure all system improvements are designed and constructed in accordance with federal, state, and local regulations to maintain water system integrity and quality.
- Reevaluate development impact fees (DIFs) for RLL at least every five years to adjust fees as necessary based on updated data, ensuring fair and adequate funding for future infrastructure needs.

This page intentionally left blank.

4.10 AVAILABILITY OF SERVICES NOT PROVIDED BY THE CITY

As indicated in the previous sections, the provision of services to the population of Brawley is shared with other agencies. This section addresses the availability of services not provided by the City.

4.10.1 Schools

The Brawley planning area, which includes the City limits and the SOI, is served by the Brawley Elementary School District (BESD) and the Brawley Union High School District (BUHSD). The BESD is comprised of five schools: Barbara Worth Junior High School, JW Oakley School, Miguel Hidalgo School, Myron D. Witter School, Phil D. Swing School and Padilla-Pace Middle School. 2021-2022 enrollment within the BESD is approximately 3,830 students, which is near capacity of 4,000 students. Development impact fees are \$2.92 per square foot for residential projects and \$0.39 per square foot for commercial projects.

The BUHSD provides education for grade 9–12 students within the planning area and includes a total of two schools: Brawley High School and Desert Valley High School. The 2021 enrollment of approximately 2,048 students at the three schools is near capacity. School impact fees are \$1.07 per square foot for residential development and \$0.17 per square foot for commercial projects. In addition to the above, private elementary school facilities are available to serve students from preschool through 12th grade.

School services, including new school construction, are financed through property taxes, State and local bonds, and development impact fees. Mello-Roos districts are also established in many communities where large-scale new development is occurring. The districts' voters may also impose special taxes with a two-thirds approval.

4.10.2 Electric

The City coordinates the provision of electricity and other services for new development to ensure that adequate rights-of-way, easements, and improvements are provided. As of 2024, the Imperial Irrigation District (IID) serves an estimated 165,000 customers, in accordance with ANSI Standards Q- 84, 1-1995, which establishes normal voltage ratings and operating tolerances for 60-hertz electric power systems. The current price the district pays to customer-generators participating in the NEM and net billing programs for their net surplus electricity generated is approximately \$685,740 annually. The current overall gross impact of IID's distributed generation programs is estimated at \$13.2 million annually. Considering the value of solar, the estimated net impact is \$5.8 million.

The primary source of electrical energy is provided by fossil fuels; however, energy is created from a mix of hydrological, solar, nuclear, gas, and coal. Approximately 70% is purchased from outside the region and 30% is produced locally. The IID estimates that the average residential consumer uses more than the national average of energy per year due to the need for summer air conditioning. The IID has implemented energy conservation measures to reduce consumption, but anticipated growth in the region is likely to require new facilities in the future. IID currently obtains approximately 30% of its energy from renewable sources.

IID operates nine hydroelectric generation plants, a 180-MW steam plant, eight gas turbines, and an eight-unit diesel plant. IID electrical service facilities include a 161 kilovolt (kV) transmission line that bisects the project site from north to south and a 92 kV transmission line that runs along

Shank Road adjacent to or through the northern Luckey Ranch area. All transmission lines are required to be located above ground. Future undergrounding of distribution lines is allowed. Future development within the SOI will require analysis by IID planners, and new substations and transmission lines may be required.

4.10.3 Telecommunications

AT&T (formerly SBC) provides telecommunications service to the City. The California Public Utilities Commission sets the performance standard through a series of established tariffs. The telephone company is a publicly regulated utility and is obligated to serve the community and improve facilities as needed. The exact need for telephone lines to serve the SOI cannot be determined at this time. Conservative estimates could result in the installation of two lines per residential dwelling unit and an unknown number of lines to serve commercial and industrial areas. No impacts on existing telephone services have been identified.

4.10.4 Natural Gas

The City coordinates with the natural gas supplier, Southern California Gas Company when new development occurs to ensure adequate rights-of-way and easements are provided. The City has developed policies to promote energy conservation, and new development is required to conform to State Title 24 Energy Regulations. Natural gas supply and infrastructure are well established and can be extended as development proceeds.

4.10.5 Airport Facilities

The Brawley Municipal Airport is located in the northern portion of the Imperial Valley. The history of the airport dates back to the 1930s when the City of Brawley acquired land for a municipal airport. The existing airport covers 160 acres and is bounded by Best Road to the east, Jones Street to the south, Eastern Avenue and the Union Pacific Railroad to the west, and agricultural uses to the north. At present, the airport is classified as a B-II-Visual airport and serves general aviation and agricultural (crop dusting) operations. The airport also provides support for emergency military operations.

Services available at the airport include aircraft maintenance, aircraft storage in T-hangars and conventional hangars, permanent and transient aircraft tie-down storage, and aircraft fueling. The airport includes a single runway with dimensions of 4,500 feet by 60 feet and an existing airport hangar totaling 94,600 square feet. Police, fire protection, and other municipal services are supplied by the City. There are 62 aircraft based from the airport—56 single-engine planes, 4 multi-engine planes, and 2 helicopters—according to the Federal Aviation Administration as of February 2012. Aircraft operations were estimated to include approximately 105 operations per week during 2010.

Future growth of the City of Brawley will possibly entail additional passenger flights in and out of the area, and the addition of new industry in the City may create the need for additional cargo trips. Expansion of the airport will create additional opportunities for increased operations and possible commuter service. The DIF Study identified the need for an 85,000 square-foot expansion of airport hangar space and a runway extension of 1,100 linear feet as a result of anticipated future development through 2030. Also, as noted in the City's CIP, is an update of the Airport Master Plan.

The fees established in the DIF Study are expected to finance 100% of the airport facility demands for future development within the City through 2030. Airport capital development is also funded in

a variety of ways depending upon the nature of the development and sponsor of the particular project. The Airport Improvement Program is on a share basis, where the Federal grant pays only part of the total cost of an eligible project. The balance of funding must come from other sources, such as State grants or from the project sponsor. Airport operations are funded by the City primarily through income generated by airport concessions, rentals, and leases, and also from intergovernmental grants

This page intentionally left blank.

5.0 FINANCING

5.1 INTRODUCTION

The City of Brawley, like most cities in Imperial County, functions as a self-contained service provider for traditional city services such as fire and police protection, water and sewage treatment, street maintenance, parks and recreation, and libraries. The isolated nature of most Imperial County cities provides very limited opportunities for shared facilities and/or for the consolidation or reorganization of service providers.

Economic conditions in Imperial County, including the City of Brawley, limit opportunities for voter approval of special taxes or assessments, such as utility taxes. In 2022, Brawley's median household income was approximately \$43,000, significantly lower than the statewide median household income of \$84,097. Furthermore, 21.4% of families in Brawley lived below the poverty level, compared to 11.5% statewide. The City's small size results in slow growth in infrastructure funding from property taxes, user fees, and development impact fees.

The City currently has a weak commercial base. As a result, many residents from the City of Brawley as well as nearby jurisdictions, commute to El Centro for their shopping needs. Therefore, the City has the potential to capture more sales tax revenue by providing additional commercial opportunities to those who might otherwise not shop in the City. As new commercial developments occur within its jurisdiction, sales tax revenue will increase and will help to pay for any previous and existing inadequacies in City facilities and services. In addition, more residential development within the City will increase property tax revenue and will also help to pay for any previous and existing inadequacies in City facilities and services.

CFDs and Impact Fees are mechanisms for future developments that will provide additional funding for City facilities and/or services. Currently, there are seven CFDs that have been formed within the City. The DIF Study was adopted in 2010. Therefore, sales and property taxes, CFDs, and impact fees are expected to implement many of the recommendations shown in this plan and provide for previous, existing, and future City facility and services needs. Audited financial statements and City budgets are available at the City of Brawley. Complete budgetary information is available for viewing at the City Finance Department.

This section of the SAP lists and describes the revenue sources and financing mechanisms that are currently utilized by the City to fund the development and operation of the various facilities and services discussed within Chapter four of this SAP. Revenue sources and financing mechanisms that are not currently used but that are being reviewed and considered by the City for future funding are also described.

5.2 EXISTING REVENUE SOURCES

The following discussion presents the sources of revenue that are currently utilized by the City to accumulate finances necessary to develop and operate the various facilities and services discussed in the SAP. The City projects revenue for future expansion of City services to come from following the primary sources.

For FY 23-24, the City Finance Department estimates the following deposits into the General Fund: \$3,409,000 from Sales Tax, \$0 from Measure D funds, and \$5,956,996 from Property Taxes. Community Facilities Districts (CFDs) will contribute \$226,640, while Landscape and Lighting Maintenance Districts (LLMDs) will provide \$0. The Transient Lodging Tax is expected to generate \$460,000. Other sources of General Fund revenue include \$640,000 from Franchise

Taxes, \$57,000 from Business License Tax, \$60,000 from Real Property Transfer Tax, and \$2,400,000 from Utility Users Tax, which was updated in 2022 to remove the sunset and expand the tax. There are no additional public services or facilities user fees beyond those listed in the 2016 SAP, and there are plans to update the Development Impact Fee (DIF) Study adopted in September 2010, funded by the General Fund under the Planning Department.

Special Revenue estimates for FY 23-24 include \$12,000 from Development Impact Fees (DIFs), \$3,006,766 from Motor Vehicle License Fees, and \$0 from the Gasoline Tax. Other transportation funding sources include \$0 from the State Transportation Improvement Program (STIP) and the Federal Highway Administration, and \$112,204 from the Transportation Development Act – Article 3. Additionally, \$681,078 is expected from Community Development Block Grants (CDBG). Existing financing mechanisms encompass the General Fund, Developer/Builder Contributions, Special Assessment Districts, Community Facility Districts, and Grant Funding.

5.2.1 Taxes

The City receives tax revenue from property taxes (landscape and lighting district), sales and use taxes (including Measure D sales tax), transient lodging tax, franchise taxes, business license tax, real property transfer tax, and utility users taxes.

5.2.2 Intergovernmental Sources

Revenue from intergovernmental sources primarily come from State and Federal transfers such as motor vehicle license fees, sales and use taxes (including gas tax), and intergovernmental grants (including community development block grants).

5.2.3 Service Charges and Impact Fees

Service charges include various fees for City services such as water, wastewater, and solid waste services, recreation, library, parking, and dial-a-ride fares. In addition, jurisdictions often charge private developers various development impact fees to assure that the demand for and physical and financial impacts on public services and facilities caused by development projects are adequately addressed. The DIF Study (David Taussig & Associates 2010) was prepared to enable the City to update its development impact fees that include fees for the following categories:

- General Government Facilities
- Library Facilities
- Park Facilities
- Airport Facilities
- Police Facilities
- Fire Facilities
- Animal Control Facilities
- Transportation Facilities
- Stormwater Facilities
- Administrative Facilities

The updated DIF Study was adopted on September 20, 2010. It will be updated in FY 2025/2026.

5.2.4 Miscellaneous Revenue

This source of revenue results from property sales, workers compensation reimbursements, contributions, rents and royalties, loan repayments, and airport rentals and leases. Other minor sources of City revenue are licenses and permits, fines and forfeits, and interest on deposited funds.

5.3 FUTURE REVENUE SOURCES

Future revenue sources to be considered include Community Facilities Districts (CFDs) contributing \$0, updated user fees with a citywide fee study in progress, and updated Development Impact Fees (DIFs), though the study has not yet started. State and federal funding includes a \$651,000 state grant for the Library for FY 23-24 and FY 24-25. Future financing mechanisms under consideration include the General Fund with a potential additional half-cent sales tax. The following discussion presents sources of revenue that the City Finance Department is considering for future use to increase available financial resources and increase the efficiency of operations.

In addition to utilizing existing financing mechanisms, Brawley can benefit from recent legislation designed to recapture elements of the former redevelopment fund process. SB 628 (Beall), enacted in November 2014, allows for the creation of Enhanced Infrastructure Financing Districts (EIFDs). These districts provide financing for various infrastructure projects that directly connect to their users. EIFDs can fund traditional public works like roads, highways, bridges, parking facilities, transit stations, sewage and water facilities, flood control and drainage projects, solid waste disposal, parks, libraries, and child care facilities. They also support projects such as brownfield restoration, environmental mitigation, military base reuse, affordable housing, private industrial buildings, transit-oriented development, and sustainable communities strategies.

Unlike Infrastructure Financing Districts, which require a two-thirds vote to form, EIFDs can be established without a vote. A city or county's legislative body can designate one or more proposed EIFDs, including non-contiguous areas or parts of former redevelopment project areas. Once established, SB 628 mandates the creation of a public financing authority responsible for developing an infrastructure financing plan. This plan could involve tax increment financing, public or private loans, grants, bonds, assessments, fees, or a combination thereof. The issuance of tax increment bonds under an EIFD requires only a 55 percent voting threshold for approval, rather than the usual two-thirds majority.

Additionally, SB 614 (Wolk) provides another financing tool by authorizing cities to include an annexation development plan in their resolutions. This plan allows the formation or reorganization of a special district to improve infrastructure serving disadvantaged, unincorporated communities (DUCs). A DUC is defined as a community with a median household income below 80% of the statewide median. The financing plan for such an annexation, part of the existing LAFCO process, can utilize tax increment financing until January 1, 2025, to fund infrastructure improvements.

5.3.1 Local Funding

There are eight CFDs that have been formed in the City:

1. Victoria Park (CFD No. 2005-1)
2. Gateway (CFD No. 2005-2)
3. La Paloma (CFD No. 2005-3)
4. Latigo Ranch (CFD No. 2005-4)

5. Malan Park (CFD No. 2006-1)
6. Luckey Ranch (CFD No. 2007-1)
7. Springhouse (CFD No. 2007-2)
8. Porter Ranch (CFD No. 2017-1)
9. Rancho Los Lagos (TBD)

5.3.2 State and Federal Funding

Various government programs at both the State and Federal levels provide crucial financial assistance to local jurisdictions like the City of Brawley for financing public facilities and services. The City actively pursues these funding opportunities to support its infrastructure and community development initiatives. State-level funding typically requires formal applications outlining project details and intended use of funds. Assistance from the State may include grants, low-interest loans, and matching funds, which are essential for implementing capital projects and enhancing community services.

At the Federal level, financial assistance is available in the form of grants and Federal matching funds administered through State-run programs. These resources play a significant role in supplementing local budgets and supporting large-scale projects.

The City of Brawley considers various State and Federal grants and funding sources, including:

- **Community Development Block Grants (CDBG):** Issued by the U.S. Department of Housing and Urban Development (HUD), CDBG funds are versatile and can be used for a wide range of community development activities, such as infrastructure improvements, housing rehabilitation, and economic development initiatives.
- **Congestion Mitigation and Air Quality Improvement Program (CMAQ):** Managed by the U.S. Department of Transportation (DOT), CMAQ funding supports projects that reduce traffic congestion and improve air quality. These funds are particularly valuable for transportation-related infrastructure and environmental enhancement projects.
- **Intermodal Surface Transportation Efficiency Act (ISTEA) Funds:** Provided by the Federal government, ISTEA funds are allocated through State transportation departments to enhance transportation infrastructure and promote efficient, multimodal transportation systems.

By leveraging these State and Federal funding opportunities, the City of Brawley aims to enhance its infrastructure resilience, improve public services, and support sustainable community development initiatives. Ongoing efforts include monitoring new funding programs and adjusting strategies to maximize financial resources for local projects that benefit residents and businesses alike.

This page intentionally left blank.