

**DEPARTMENT OF TRANSPORTATION**

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a California Way of Life*

May 27, 2025

Knarik Vizcarra, Planning Manager  
Community Development Department  
City of Azusa  
213 East Foothill Boulevard,  
Azusa, CA 91702

RE: Azusa Greens Redevelopment  
Project – Draft Environmental Impact  
Report (DEIR)  
SCH# 2023120720  
GTS #07-LA-2024-04794  
Vic. LA 210 PM 38.3

Dear Knarik Vizcarra,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The industrial portion of the Project would involve demolition of the existing golf related improvements on the 19.33-acre industrial site and installation of six new, tilt-up concrete Class A industrial buildings with associated office space. The buildings would total 353,075 square feet (SF) and include four access driveways along North Todd Avenue and four access driveways along West 10th Street. Parking, landscape, utility connections, and sidewalk improvements would also be installed on the industrial site. Approval of the proposed minor use permit would allow business operations on the industrial site to occur 24 hours per day, 7 days per week, and approval of the proposed variance would allow for outdoor storage, including shipping containers, mechanical equipment, or materials on the industrial site. A zone change and General Plan amendment would also be required to change the industrial site zoning from Recreation to West End Light Industrial District (DWL) and to revise the planned land use from Recreation to Light Industrial.

Within the 19.82-acre residential site, existing golf-related improvements would be demolished and 38 residential buildings containing 230 dwelling units (within 330,101SF) for individuals 55 years and older would be constructed. The units would be distributed between 32 single-story duplexes, 4 single-story triplexes, and 2 three-story stacked flat buildings 41.5 feet in height. A leasing/clubhouse building, cabana, and recreational

*"Provide a safe and reliable transportation network that serves all people and respects the environment."*

amenities would also be provided in the residential community. There would be two residential community entrances along Sierra Madre Avenue that would connect and lead to an entry gate. Proposed development on the residential site would require a zone change from Recreation to Neighborhood General 3 Medium Density Residential and a General Plan amendment to change the land-Use designation from Recreation to Medium Density Residential. The Project also proposes a lot line adjustment. A total of 52.97-acres of the existing Azusa Greens Country Club golf course, inclusive of the golf course clubhouse, parking lot, and driving range, would remain in place with minor adjustments to golf holes and driving range, as well as renovation of the 10,032 SF golf course clubhouse to include a function room. The existing parking area for the golf course site would also be altered to accommodate the residential site driveway. Safety improvements consisting of signage and pavement markings would occur at existing golf cart crossings along Sierra Madre Avenue.

After reviewing the DEIR, Caltrans has the following comments:

The DEIR states that the proposed project will result in a significant and unavoidable transportation impact due to exceeding Vehicle Miles Travelled (VMT) impact thresholds. Caltrans concurs that the project creates a significant VMT impact as proposed but does not concur that it is unavoidable. Currently, the project is designed in a way that induces a high number of vehicle trips per household due to being an exclusively car-oriented development. The proposed project also extends the suburban area and sprawls into the Wildland Urban Interface (WUI) as designated by the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP), increasing wildfire risks in addition to the significant VMT impacts. The Lead Agency is encouraged to integrate transportation and land uses in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. Building and zoning for a better balance between housing and employment opportunities can help mitigate commuting distances and create compact, walkable communities. Caltrans recommends the following to more effectively address the significant VMT impact that this project will create as currently proposed:

- Provide for a mixture of land use types within the Project's new zoning area to allow for adaptive reuse in the future. This can allow goods, services, and jobs to be created closer to where the project's residents live.
- Increase density, both vertically and horizontally. Land use developments, like the one proposed, should not sprawl across huge areas of land. By bringing the built

environment closer together, and building up instead of out, it becomes possible to greatly reduce energy use, improve walkability, allow for adaptive reuse, and generate real value for the community.

- Reduce the amount of car parking whenever possible, as abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building too much parking.
- Rates of car ownership and vehicle miles traveled (VMT) are significantly lower for senior and low-income households. Seeing as this project includes both, there is sufficient justification to reduce the amount of car parking provided even further. This can help the project promote greater affordability and help achieve regional housing and transportation goals.
- There should be no more than one car parking space per unit, and at least one long-term bicycle parking space per unit. Regarding Mitigation Measure TR-2: Caltrans supports the inclusion of bicycle parking in compliance with CALGreen codes. Caltrans also recommends following bicycle parking best practices described in the "Essentials of Bike Parking" guide created by the Association of Pedestrian and Bicycle Professionals (link to online PDF: <https://www.apbp.org/Publications>). Short-term bike parking should be installed a minimum of 24" away from walls and other objects (e.g. trash cans, plants, etc.). With the growing use of electric bikes and cargo/utility bikes (which tend to be bigger and heavier), Caltrans also recommends that short-term and long-term bicycle parking facilities be designed to accommodate a range of bicycle styles and sizes. The "Essentials of Bike Parking" guide offers recommendations on the most effective types of short-term and long-term bike parking.
- Provide an on-site transportation hub and work with local transit operators to provide high quality service to the stop. This should include a rapid, high-frequency shuttle or bus between the Metro A Line Azusa light rail station and the project site. This Azusa station is only one mile away and a robust connection to it would be transformative for offsetting the VMT impacts of the Project.

- Ensure robust Wi-Fi availability to all units to encourage teleworking.
- Avoid gated developments. Gates and walls divide communities, limit transportation choices, and increase VMT. For these reasons they should be avoided. If walls are still to be allowed, numerous access points should be provided for people walking or riding bicycles to be able to reach their homes and other destinations easily.
- Due to the significant VMT impacts of the Project, a contribution should be made to the Lead Agency's VMT Mitigation Fund (if established) with the purpose of funding safer infrastructure for people walking, riding bikes, and taking transit throughout the Project area. The most effective methods to reduce pedestrian and bicyclist exposure to cars and trucks is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.
- Additional alternative mitigation measures should be considered and implemented to reduce the impact on VMT, as reducing the project's current impacts are critical to developing infrastructure that is both environmentally and economically sustainable. Following construction, a study needs to be conducted to confirm that the proposed mitigation measures are sufficiently offsetting the Project generated VMT. If not, new and/or additional mitigation measures need to be implemented.

By implementing these recommendations, the Azusa Greens Redevelopment Project can enhance regional connectivity, improve safety for all users, reduce VMT, and support sustainable transportation choices.

Finally, construction of the proposed project would involve deliveries of materials, components, and supplies to the various sites, and will involve oversized trucks. As a result, prior to issuance of building or grading permits for the project site, the applicant shall prepare a Construction Traffic Management Plan (CTMP) for review and approval by Lead Agency staff to reduce any impacts to less than significant levels. The CTMP needs to specify the duration of construction period and provide construction analysis on significant impacts due to increase in construction truck traffic on highways not designated as truck routes. It should also specify any work that would affect the freeways and its facilities, and that Caltrans has the jurisdiction for review and approval. Transportation of heavy construction equipment and/or materials, which requires the use

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of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS #07-LA-2024-04794.

Sincerely,

*Miya Edmonson*

Miya Edmonson  
LDR Branch Chief

Cc: State Clearinghouse