

**DEPARTMENT OF TRANSPORTATION**

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a California Way of Life*



January 24, 2024

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

RE: Azusa Greens Redevelopment  
Project – Notice of Preparation (NOP)  
SCH #2023120720  
GTS #07-LA-2024-04415  
Vic. LA 210 PM 38.305

Dear Knarik Vizcarra,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The project would redevelop a portion of the Azusa Greens Golf Course and maintain the remainder of the land as a functioning 9-hole golf course and driving range. The project involves three components: a proposed industrial site, a proposed 55+ age-restricted residential community site, and a reconfigured nine-hole golf course and driving range.

After reviewing the NOP, Caltrans has the following comments:

As stated in the submitted Initial Study, the project could result in potentially significant transportation impacts. Caltrans looks forward in reviewing the Project's and Cumulative Project's Impact Analysis including, but not limited to the following:

1. VMT Analysis.
2. Queuing Analysis at these nearby interchanges to make sure that off-ramp traffic doesn't back up all the way to the mainline and turning pockets are adequate and not blocking through traffic:
  - a. I-210/Irwindale Ave
  - b. I-210/Vernon Ave

c. I-210/Azusa Ave

3. If the project will generate pedestrians and/or bicyclists, perform Multi Modal (Biking, Walking, Bus, Transit, etc.) Access and Conflict Analysis.
4. Provide Complete Street Access (ADA Curb Ramps, Sidewalks, Bike Lane, High Visibility Crosswalks, APS, LPIs, etc.).
5. If there's any significant transportation impact, mitigation measures (e.g. TDM, TSM, etc.) need to be implemented.

With the addition of 350,320 square feet of industrial uses, 230 residential units, 896 car parking spaces, and 255 trailer stalls, the Azusa Greens Redevelopment Project will induce demand for a consequential number of additional vehicle trips and vehicle miles traveled (VMT) if not designed correctly. 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. Caltrans recommends the following to more effectively address the significant VMT that this project could potentially create as currently proposed:

- Provide for a mixture of land use types within the Project's new zoning area to allow for adaptive reuse. 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 parking whenever possible. 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.

- Provide affordable housing units. These units not only improve affordability, they also reduce the demand for ever increasing amounts of car infrastructure, as rates of car ownership and vehicle miles traveled (VMT) are significantly lower for low-income households than they are for high-income households. Since the project includes affordable housing, there is an even greater justification for reducing car parking to promote affordability and achieve a more diverse and sustainable land-use pattern.
- Improve connections to existing active transportation and transit infrastructure. This can be done with robust signage, wayfinding, safety improvements, and human scale amenities. Some examples for this project would be:
  - a. Coordinating with Foothill Transit to bring an appropriate route to the project site that will create a robust access to Azusa Intermodal Transit Center in addition to local goods and services. This route should have fast and frequent service, as frequency is freedom.
  - b. Upgrading the bike lane network with physically protected Class 4 bikeways. This network should reach all nearby medical centers, grocery stores, job centers, transit hubs, and the San Gabriel River Trail.
  - c. Both the transit and bikeway improvements would greatly enhance access to necessary services for all residents and employees of the project site. Changes like these are common sense, affordable ways to greatly reduce VMT.
- Protect vulnerable road users. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles 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.

Finally, there may be encroachment permits required for any project work proposed on or near Caltrans Right of Way. The transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will also need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

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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-2024-04415.

Sincerely,

*Frances Duong*

Frances Duong  
Acting LDR/CEQA Branch Chief

Cc: State Clearinghouse