



MEMO

TO: Transportation Conformity Working Group (TCWG) of Southern California Association of Governments (SCAG)

FROM: Michael Rogozen, D.Env; Hina Gupta, MPl; Patricia Haigh, BS, BA

DATE: Monday, August 11, 2025

PROJECT #: 7327

RE: Revised PM Conformity Hot Spot Analysis for the Foothill Boulevard Improvement Project, STPL-5307(031). Fontana, California

In October 2023, UltraSystems prepared the PM Conformity Hot Spot Analysis Form for the Foothill Boulevard Improvement Project (project). This form was subsequently reviewed and approved by the Transportation Conformity Working Group (TCWG). At that time, the project was anticipated to proceed under a National Environmental Policy Act (NEPA) Categorical Exclusion (CE).

In 2024, UltraSystems completed the Caltrans-required cultural resources studies for the project, including the Historic Property Survey Report (HPSR), Area of Potential Effect (APE) Maps, Archaeological Survey Report (ASR), Historical Resources Evaluation Report (HRER), and a Finding of No Adverse Effect (FOE). These documents were submitted by Caltrans District 8 to the California State Historic Preservation Officer (SHPO) for review.

Following SHPO's review, Caltrans received concurrence on all eligibility determinations except for the Malaga Underpass Bridge and the Malaga Underpass Bridge Pumphouse. SHPO did not concur with the determination that these two structures are not eligible for listing in the National Register of Historic Places (NRHP). In response to SHPO's non-concurrence, Caltrans directed that a revised HPSR be prepared with a Finding of Adverse Effect (FAE).

This change in the determination of effect on historic resources necessitates the preparation of revised cultural resources documentation, as well as a shift in the project's environmental clearance from a NEPA Categorical Exclusion to a NEPA Environmental Assessment (EA) with a Finding of No Significant Impact (FONSI). Additionally, a California Environmental Quality Act (CEQA) Environmental Impact Report (EIR) is now required.

As confirmed through email correspondence dated May 27, 2025, between Michael Rogozen (UltraSystems), Vanessa Schoenewald (San Bernardino County Transportation Authority), and Karen Calderon (Southern California Association of Governments), the project is required to return to TCWG for re-evaluation for the following reasons:

1. The change in NEPA classification from a CE to an EA/FONSI requires Federal Highway Administration (FHWA) participation in the hot spot determination process.
2. TCWG would need clarification or confirmation on whether there have been any major changes to the project's design or scope that may have contributed to the identification of impacts to historic resources, as such changes could potentially affect the prior hot spot finding.
3. The original TCWG determination was based on the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Since the 2024 RTP/SCS is now the currently conforming plan, the project needs to be re-evaluated for consistency with the updated plan.

UltraSystems has prepared a revised PM Conformity Hot Spot Analysis Form, which is attached to this memorandum as a redlined document. The most notable revisions include a change in the federal action from a Categorical Exclusion to an EA with FONSI, updated programming dates and a statement explaining that the traffic study is still applicable. We confirm that no major changes to the project's design or scope have occurred that contributed to the identification of cultural resource impacts.

ATTACHMENT

Revised PM Conformity Hot Spot Analysis

PM Conformity Hot Spot Analysis Project Summary Form for Interagency Consultation

The purpose of this form is to provide sufficient information to allow the Transportation Conformity Working Group (TCWG) to determine if a project requires a project-level PM hot spot analysis pursuant to Federal Conformity Regulations.

The form is not required under the following circumstances:

1. The project sponsor determines that a project-level PM hot spot analysis is required or otherwise elects to perform the analysis; or
2. The project does not require a project-level PM hot spot analysis since it:
 - a. Is exempt pursuant to 40 CFR 93.126; or
 - b. Is a traffic signal synchronization project under 40 CFR 93.128; or
 - c. Uses no Federal funds AND requires no Federal approval; or
 - d. Is located in a Federal PM attainment area (note: PM10 and PM2.5 areas differ).

Projects other than those listed above may or may not need a project-level PM hot spot analysis depending on whether it is considered a "Project of Air Quality Concern" (POAQC), and should be brought before the TCWG for a determination.

It is the responsibility of the project sponsor to ensure that the form is filled out completely and provides a sufficient level of detail for the TCWG to make an informed decision on whether or not a project requires a project-level PM hot spot analysis. For example, the TCWG will be reviewing the effects of the project, and thus part of the required information includes build/no build traffic data. It is also the responsibility of the project sponsor to ensure a representative is available to discuss the project at the TCWG meeting if necessary.

Instructions:

- 1) Fill out form in its entirety. Enter information in gray input fields.**
- 2) Be sure to include FTIP ID#. See <http://www.scag.ca.gov/ftip/index.htm> if necessary.**
- 3) Submit completed form to your local Transportation Commission who will submit it to the MPO. Caltrans projects can be submitted by Caltrans District representatives.**

The TCWG meets the fourth Tuesday of each month at SCAG Headquarters, 818 W. 7th Street, 12th Floor, Los Angeles, CA 90017. Participation is also available via teleconference. Call (213) 236-1800 prior to meeting to get the call-in number and pass-code.

Forms must be submitted by the second Tuesday of the month to be considered at that month's TCWG meeting.

REFERENCE

Criteria for Projects of Air Quality Concern (40 CFR 93.123(b)) – PM₁₀ and PM_{2.5} Hot Spots

- (i) New highway projects that have a significant number of diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles;
- (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- (iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM₁₀ or PM_{2.5} applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

Links to more information:

<http://www.fhwa.dot.gov/environment/conform.htm>

<http://www.epa.gov/otaq/stateresources/transconf/index.htm>

TABLE 1
Type of Project

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| <ul style="list-style-type: none">• New state highway• Change to existing state highway• New regionally significant street• Change to existing regionally significant street• New interchange• Reconfigure existing interchange• Intersection channelization• Intersection signalization• Roadway realignment• Bus, rail, or inter-modal facility/terminal/transfer point• Truck weight/inspection station• At or affects location identified in the SIP as a site of actual or possible violation of NAAQS |
|--|

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

FTIP ID# <i>(required)</i> : 20190104				
TCWG Consideration Date August 26, 2025				
Project Description <i>(clearly describe project)</i> The project consists of widening the segment of Foothill Boulevard between Hemlock Avenue on the west and Almeria Avenue on the east from four lanes to six lanes, plus adding a median, sidewalks, buffered bicycle lanes, new street lights and a traffic signal at a currently unsignalized intersection. The Malaga Bridge over Foothill Boulevard – which historically carried a Pacific Electric (PE) interurban railway line and now is a pedestrian and bicycle bridge – will be relocated within the project limits. Malaga Bridge would be replaced over the widened Foothill Boulevard by a new single-span steel truss bridge to accommodate the six-lane facility.				
Type of Project <i>(use Table 1 on instruction sheet)</i> : Roadway realignment and intersection signalization				
County San Bernardino	Narrative Location/Route & Postmiles: Widen Foothill Boulevard (4-6 lanes) from Hemlock Avenue to Almeria Avenue; includes class II bike lanes, raised median, and replacement of historic Malaga Bridge to accommodate street widening. The existing Malaga Bridge will be relocated within the project site, along the existing Pacific Electric Trail. See Figure 1: Regional Location and Project Vicinity and Figure 2: Project Study Area (attached) Caltrans Projects – EA#			
Lead Agency: City of Fontana (CEQA Lead Agency)				
Contact Person Christopher Smethurst	Phone# (909) 350-6649	Fax#	Email CSmethurst@fontana.org	
Hot Spot Pollutant of Concern <i>(check one or both)</i> PM2.5 ☒ PM10				
Federal Action for which Project-Level PM Conformity is Needed <i>(check appropriate box)</i>				
Categorical Exclusion (NEPA)	☒ EA or Draft EIS	☒ FONSI or Final EIS	PS&E or Construction	Other
Scheduled Date of Federal Action:				
NEPA Assignment – Project Type <i>(check appropriate box)</i>				
Exempt	Section 326 –Categorical Exclusion	☒ Section 327 – Non-Categorical Exclusion		
Current Programming Dates <i>(as appropriate)</i>				
	PE/Environmental	ENG	ROW	CON
Start	2022	N/A	2025	2026
End	2023	N/A	2026	2027

Project Purpose and Need (Summary): *(attach additional sheets as necessary)*

Project Purpose

The purpose of the proposed project is to accomplish the following specific objectives:

- To enhance the safety and operations of Foothill Boulevard (reduce accidents).
- Eliminate roadway deficiencies (eliminate nonstandard roadway sections).
- Provide transportation improvements and bike lanes consistent with the City of Fontana's General Plan Community Mobility and Circulation Element (close the gap).

These objectives would be accomplished by adding one lane in each direction from Hemlock Avenue to Almeria Avenue, providing a continuous six-lane facility to match the existing cross sections at Hemlock Avenue and Almeria Avenue. The project would provide bike lanes, sidewalks and a raised median as required by the City's general plan for a modified major highway with a 120-foot section. To accommodate this section, the historic Malaga Bridge would need to be replaced with a longer span structure.

Project Need

Safety and Operations: Foothill Boulevard within the Malaga Bridge vicinity has a higher-than-average history of collisions due to the lack of horizontal clearance and limited sight distance. According to the collision data provided by the City of Fontana, between January 1, 2009 and October 2019, there were 253 collisions; 66 of those included injuries and nine included fatalities; total deaths were 13.

Roadway Deficiencies: The existing section of Foothill Boulevard within the project limits is a four-lane facility with no median, shoulders or sidewalks. The roadway is further reduced at the Malaga Bridge abutments; this is inconsistent with the City's general plan and standards.

Consistency with the General Plan: Based on the general plan, Foothill Boulevard is required to accommodate a modified major highway with a 120-foot section. However, within the project limits, the average road width is only about 48 feet. In addition, Foothill Boulevard is designated as a truck route and the reduced section is not appropriate for truck traffic.

Surrounding Land Use/Traffic Generators *(especially effect on diesel traffic)*

The land uses within and surrounding the project study area consist primarily of residential and commercial operations along both sides of the highway.

Opening Year 2025: Build and No Build LOS, AADT, % and #trucks, truck AADT of proposed facility

The Traffic Impact Study performed for this project considered an opening year of 2025. However, the new opening year is now estimated to be 2027. Changes to the project since the initial traffic study are not anticipated to have an impact on traffic activity and air quality. Therefore, the Traffic Impact Study is still applicable to the project and traffic data presented under the opening year of 2025 are also relevant to the opening year of 2027.

See Table 1.

RTP Horizon Year / Design Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility

See Table 2.

Opening Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT

N/A

RTP Horizon Year / Design Year: If facility is an interchange (s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT

N/A

Describe potential traffic redistribution effects of congestion relief *(impact on other facilities)*

The widening is intended to remove an existing bottleneck and improve safety along the segment of roadway from Hemlock Avenue to Almeria Avenue. As a result of the widening, the volume of traffic on segments of Foothill Boulevard on either side of Malaga Bridge will increase. LOS inside the project area will remain at B, whereas under the no-build case, it would remain at D. LOS east of the project boundary (Almeria to Citrus) will decline from A to C.

Comments/Explanation/Details (attach additional sheets as necessary)

Under 40 CFR 93.123(b)—PM₁₀ and PM_{2.5} Hot Spots—the following criteria are utilized to determine the potential for a proposed project to qualify as a Project of Air Quality Concern (POAQC).

*(i) New or expanded highway projects that have a significant **number** of or significant **increase** in diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles. A significant **number** is defined as greater than 125,000 ADT and 8% or more of such ADT is diesel truck traffic, or in practice 10,000 truck ADT or more regardless of total ADT; a significant **increase** is defined in practice as a 10% increase in heavy duty truck traffic.*

The proposed project is an expanded highway project. Total ADT will be less than 125,000 and truck ADT will be less than 10,000.¹ In the opening year (2025), the project would increase the total truck ADT by up to 108 over the No-build Alternative. In the horizon year (2040), the project would increase the total truck ADT by up to 287 over the No-build Alternative. Therefore, the proposed project would not result in a significant increase in the number of diesel vehicles and would not be considered a Project of Air Quality Concern (POAQC) under this criterion.

(ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.

According to the traffic study for this project, five of the 10 intersections in the traffic study area currently have peak-hour LOS of D, E or F. None of these intersections has a significant number of diesel vehicles, as defined above. In the opening year without the project, six intersections would have a peak-hour LOS of D or E; with the project, the LOS would stay the same or improve (E to D). Finally, in the horizon year, five intersections in the traffic study area would have a peak-hour LOS of D or E; with the project, at one intersection, the AM peak-hour LOS would drop from C to D and at two intersections, the AM peak-hour LOS would improve from C to B and from D to C. At two intersections, the PM peak-hour LOS would improve from D to C. However, despite the one drop from C to D, the number of diesel trucks would not be significant. These traffic projections indicate that the project would not be considered a Project of Air Quality Concern under this criterion.

(iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location.

The proposed project would not implement a new bus or retail terminal or transfer point at which diesel vehicles would be congregating. Therefore, the proposed project would not be considered a Project of Air Quality Concern under this criterion.

(iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location.

The proposed project does not involve expansion of a bus or rail terminal or transfer point. Therefore, the proposed project would not be considered a Project of Air Quality Concern under this criterion.

(v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM₁₀ or PM_{2.5} applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

The proposed project is not in or affecting a site of possible PM₁₀ or PM_{2.5} air quality standard violation that is identified in the 2022 Air Quality Management Plan. Therefore, the proposed project would not be considered a Project of Air Quality Concern under this criterion.

¹ City of Fontana, Foothill Blvd from Hemlock Ave to Almeria Ave Improvements (Malaga Bridge) – City Tracking #SQ-04-DE-19. Traffic Impact Study. Prepared by Iteris, Inc. for City of Fontana. April 15, 2022.

Attachments:

Table 1 – Opening Year Traffic Information

Table 2 – Horizon Year Traffic Information

Figure 1 – Regional Location and Project Vicinity

Figure 2 – Project Study Area

Table 1

OIPENING YEAR (2025) TRAFFIC INFORMATION FOR FOOTHILL BOULEVARD

Segment	Level of Service		AADT		AADT Trucks	
	Build	No Build	Build	No Build	Build	No Build
Cherry Avenue – Hemlock Avenue	A	A	26,500	25,000	902 (3.40%)	861 (3.44%)
Sultana Avenue – Almeria Avenue	B	D	35,600	30,900	1,147 (3.22%)	1,042 (3.37%)
Almeria Avenue – Citrus Avenue	B	A	35,600	30,900	905 (2.54%)	797 (2.58%)

Table 2

HORIZON YEAR (2040) TRAFFIC INFORMATION FOR FOOTHILL BOULEVARD

Segment	Level of Service		AADT		AADT Trucks	
	Build	No Build	Build	No Build	Build	No Build
Cherry Avenue – Hemlock Avenue	A	A	32,600	29,000	1,627 (4.99%)	1,503 (5.18%)
Sultana Avenue – Almeria Avenue	B	D	38,400	29,700	1,590 (4.14%)	1,303 (4.39%)
Almeria Avenue – Citrus Avenue	C	A	39,500	31,700	1,388 (3.51%)	1,132 (3.57%)

Figure 1 – Regional Location and Project Vicinity

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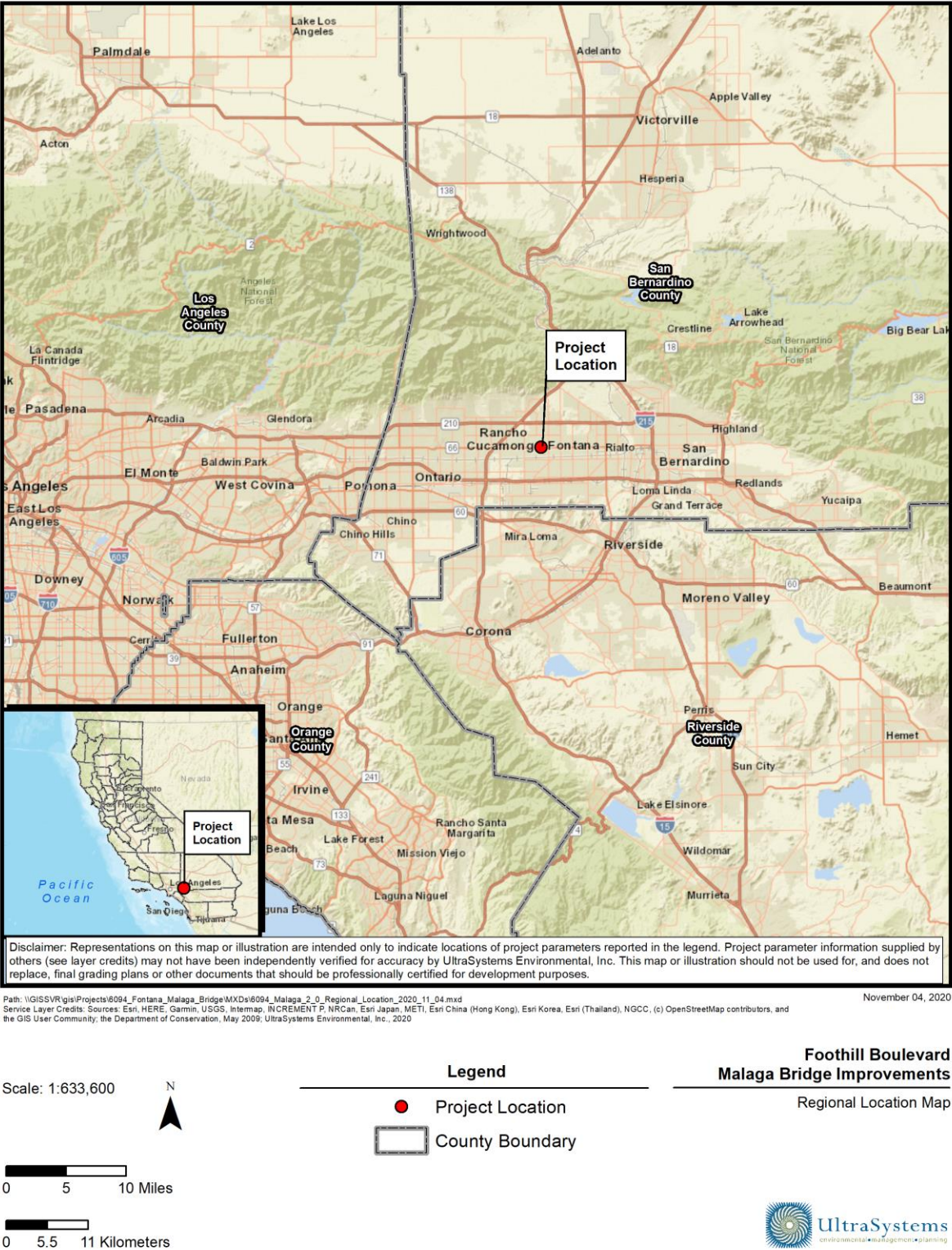


Figure 1.1 – Project Regional Location

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

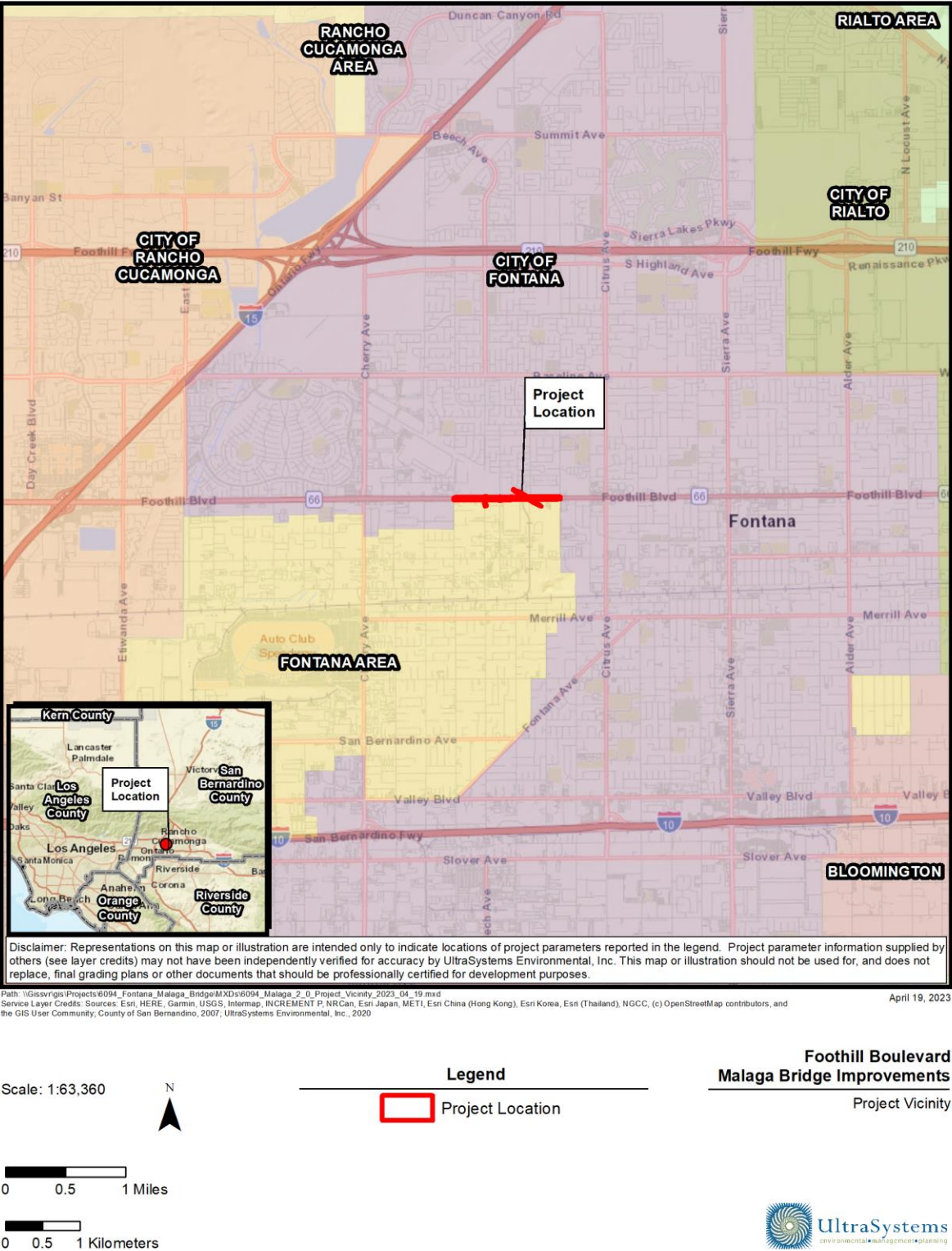


Figure 2 –Project Study Area

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

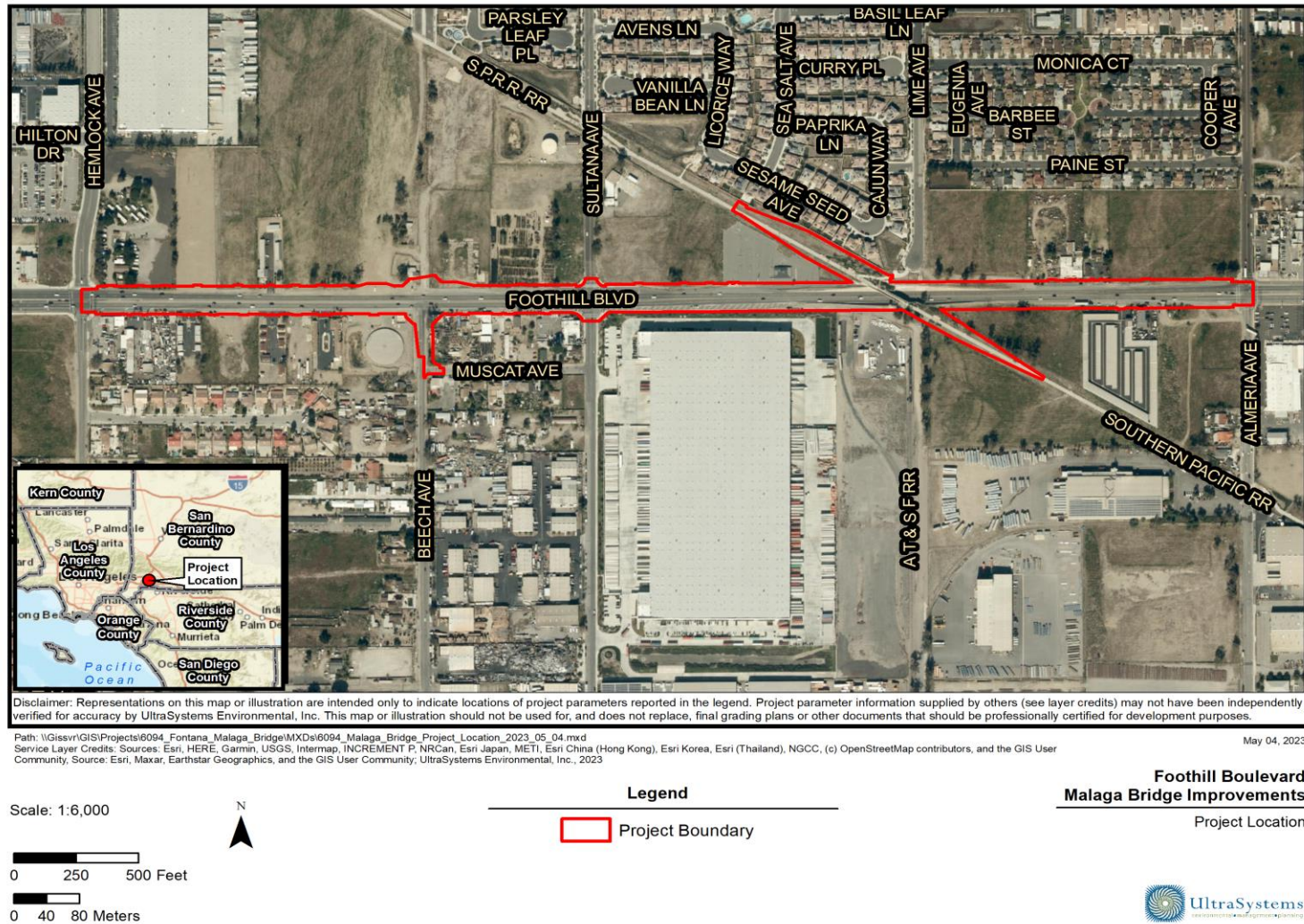
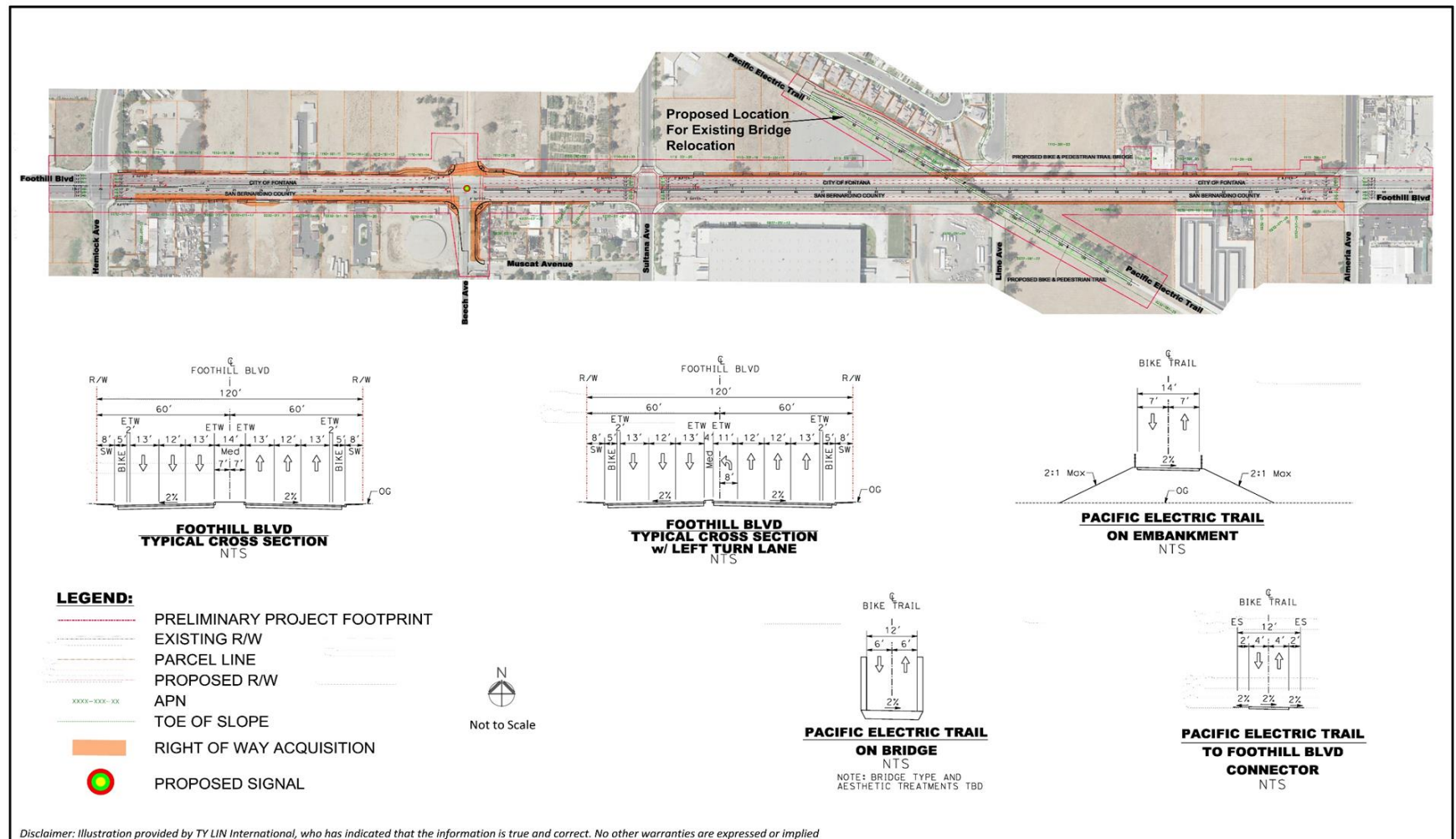


Figure 2.1 – Project Study Area

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation



Foothill Boulevard
Malaga Bridge Improvements
Site Plan

Figure 2.2 – Proposed Relocation of Bridge