Project-Level Conformity Determination Documentation for

Clinton Avenue Widening Project

Fresno County

December 2025

Fresno Council of Governments (FCOG) is providing the final documentation for $PM_{2.5}$ and PM_{10} Hot-spot Conformity Assessment for Clinton Avenue Widening Project located in the City of Fresno, Fresno County.

The project consists of widening Clinton Avenue to four lanes from 600 feet west of Marks Avenue to Valentine Avenue and installing sidewalks, bicycle facilities, streetlights, curbs, gutters, and curb ramps. The draft conformity material was posted on FCOG's (https://www.fresnocog.org/project-level-conformity/) and was available for the public comment period from December 4 through December 15, 2025. No comments were received during this public comment period. An interagency consultation (IAC) meeting was scheduled for December 17, 2025, at 1:00 – 1:30 pm (PT).

The NEPA document for this project is CE (23 USC 327), and FHWA and EPA provided concurrence that the project is not of air quality concern (non-POAQC) on December 17, 2025.

The final documentation package consists of the (1) San Joaquin Valley PM hot-spot checklist, (2) slides presented at the IAC meeting, and (3) IAC meeting minutes.

San Joaquin Valley (SJV) Hot Spot Checklist for Interagency Consultation

The purpose of this form is to provide sufficient information to allow the IAC group to determine the evaluation if a project is exempt, non-exempt, and not POAQC, or non-exempt projects and POAQC (requires a quantitative project-level PM hot spot analysis).

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 interagency consultation (IAC) to make an informed decision on whether or not a project requires further analysis. For example, the IAC group needs to consider the traffic impacts of the project, and thus part of the required information includes no build/build traffic data.

STEP 1: PROJECT IDENTIFICATION

A. Project Name and Number: Clinton Widening STPL-5060(417)

B. FTIP/CTIPS #Identification No[1]: FRE250001

C. City/County: Fresno/Fresno

D. Project Description: Widen Clinton Avenue to four lanes from 600 feet west of Marks Avenue to Valentine Avenue to recify existing issues. See Attachment A for more additional detail.

E. Type of Project:

- ☐ 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
- ☑ Others, specify:

E. Hot-Spot Pollutant of Concern (*check both*): ☑ $PM_{2.5}$ ☑ PM_{10}

F. Lead Agency: City of Fresno, Capital Projects Department

a. Contact Person: Garine Kendoyan

b. Phone #: (559) 621-8651

c. Email: garine.kendoyan@fresno.gov

[1] FTIP: Federal Transportation Improvement Program; CTIPS: California Transportation Improvement Program System.

G. Federal Action for which Project-Level PM Conformity is Needed
(check appropriate box)[2]

☑	Categorical Exclusion (NEPA)	☐	EA or Draft EIS	☐	FONSI or Final EIS	☐	PS&E or Construction	☐	Other

a. Include the scheduled date of Federal Action (if available):

H. NEPA Assignment – Project Type *(check appropriate box)*

☐	Exempt	☐	Section 326 –Categorical Exclusion	☑	Section 327 – Non-Categorical Exclusion

I. Is this project in a conforming Plan and Transportation Improvement Program (TIP)?
Yes ☑ No ☐
a. If yes, indicate the federal approval date for the latest regional conformity analysis: 5-15-2024

J. Current Programming Dates *(as appropriate)*[3]

	PE/ Env	ENG	ROW	CON
Start	2025	2024	2025	2028
End	2025	2027	2027	2028

K. Project Description (Summary, Use Additional Sheets as Needed):
Information should include, but is not limited to:

a. Purpose and need of the project.
b. Route name, route number, project length, and mile point locations
c. Number of current and future lanes (clearly indicate if any lanes are "turn lane only")
d. Identify as "Capacity Adding" or "Non-Capacity Adding" project
e. Identify intersecting roads that will be impacted.
f. Project impact on surrounding land use/ traffic generators (discuss especially effect on diesel traffic)

The project aims to rectify the current issues along Clinton Avenue. This congestion not only leads to traffic delays but also impedes various modes of transportation. The project would widen Clinton Avenue from 600 feet west of Marks Avenue to Valentine Avenue. Total project length would be approximately 0.5 mile. The roadway would be widened from three lanes undivided with a continuous left-turn lane to four lanes. Additionally, it would install sidewalk and Class II bicycle facilities. The project is a capacity adding project. The roadway to be modified intersects with Valentine Avenue. Surrounding land uses include residential, commercial, and institutional uses. There are no existing diesel-traffic generating uses on the segment. The project is not anticipated to result in a change to diesel traffic.

[2] EA: Environmental Assessment; EIA: Environmental Impact Assessment; FONSI: Finding of No Significant Impact; PS&E: Planning, Specification and Estimate.
[3] PE: Preliminary Engineering; ENG: Engineering; ROW: Right-of-Way; CON: Construction

STEP 2: EXEMPT PROJECTS

☐ **EXEMPT PROJECT**

No PM project-level conformity is required, and no further documentation is needed. ***Go to STEP 6****.*

Describe Type of Exempt Project:

Not applicable.

☑ **NOT AN EXEMPT PROJECT.** ***Go to STEP 3.***

STEP 3: TRAFFIC INFORMATION

Fill out only relevant traffic information B through G. For example, fill out D and E if the project is an intersection, and fill out F and G if the project is a bus, rail, or intermodal facility/terminal/transfer point. Include additional tables, maps, and other graphical representations of the projects in separate sheets.

A. Year(s) Selected for the Proposed Facility:

a. Year(s) selected

	Years Selected
Existing Year	2025
Opening Year	2028
Analysis Year(s)[4]	2046

b. Justification for Selection of Analysis Year(s):

2046 is the horizon year for the FCOG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Represents highest potential traffic volume.

B. Opening Year Traffic Information for No Build and Build Scenarios of the Proposed Facility

	No Build	Build
Annual Average Daily Traffic (AADT)[5]	16,500	16,500
Truck AADT	239	239
% Trucks[6]	1.45%	1.45%

[4] Section 93.116(a) of the conformity rule requires that PM hot-spot analyses consider either the full-time frame of an area's transportation plan or, in an isolated rural nonattainment or maintenance area, the 20-year regional emissions analysis. The project sponsor will need to choose an analysis year within the time frame of the transportation plan during which peak emissions from the project are expected, and new or worsened violations would most likely occur due to cumulative impacts of the project and background concentrations. In some cases, selecting only one analysis year, such as the last year of the transportation plan or the year of project completion, may not be sufficient to satisfy conformity requirements.

[5] Combine directional traffic (southbound and northbound).

[6] FHWA categorizes vehicles as Light Duty (Class 1-2) with Gross Vehicle Weight Rating (GVWR) < 10,000 lbs, Medium Duty (Class 3-6) with GVWR between 10,001 – 26,000 lbs, and Heavy Duty (Class 7-8) with GVWR > 26,001 lbs.

C. Analysis Year Traffic Information for No Build and Build Scenarios of the Proposed Facility

	No Build	Build
Annual Average Daily Traffic	23,545	23,545
Truck AADT	342	342
% Trucks	1.45%	1.45%

D. Opening Year Traffic Information for No Build and Build Scenarios of the Proposed Facility (*If the facility is an intersection or interchange*)

	No Build	Build
Cross Street AADT	Not applicable.	
Truck AADT		
% Trucks		
Level-of-Service (LOS)		
Control Delay (seconds)		

E. Analysis Year Traffic Information for No Build and Build Scenarios of the Proposed Facility (*If the facility is an intersection or interchange*)

	No Build	Build
Cross Street AADT	Not applicable.	
Truck AADT		
% Trucks		
Level-of-Service (LOS)		
Control Delay (seconds)		

F. Opening Year Traffic Information for No Build and Build Scenarios of the Proposed Facility (*If the facility is a bus, rail, or intermodal facility/terminal/transfer point)*

	No Build	Build
Number of bus arrivals	Not applicable.	
Number of bus arrivals that will be diesel buses		
Fraction (%) of bus arrivals that will be diesel buses		

G. Analysis Year Traffic Information for No Build and Build Scenarios of the Proposed Facility (*If the facility is a bus, rail, or intermodal facility/terminal/transfer point*)

	No Build	Build
Number of bus arrivals	Not applicable.	
Number of bus arrivals that will be diesel buses		
Fraction (%) of bus arrivals that will be diesel buses		

H. Describe Traffic Impacts *(if appropriate)*[7]

Project is anticipated to reduce congestion.

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

Project would alleviate existing congestion on Clinton Avenue and does not include components that would redistribute traffic.

J. Is additional traffic information (tables, maps, and other graphical representations of the project (location, project details on additional lanes or ramps) presented in additional sheets at the end of the checklist?:
Yes ☐ No ☑

[7] Provide any justification if build % traffic > no-build, large changes in AADT and trucks % even if it is below EPA's criteria, etc.

STEP 4: POAQC DETERMINATION

☑ **NOT PROJECT OF AIR QUALITY CONCERN[8].** *Quantitate analysis is NOT required. IAC review, public participation, and concurrence are required. Provide the filled-out checklist to your MPO for the next steps[9]. Use the space to provide a detailed narrative and rationale for this conclusion.*

The project would primarily serve gasoline vehicle traffic (it does not involve any increase in the number of diesel vehicles), is designed to improve traffic flow and vehicle speeds, and would not involve any increases in idling. Such projects are expected to have a neutral or positive influence on PM emissions. The project is listed in the 2025 FTIP as an exempt project that is not anticipated to result in substantial emissions. The project would provide new bicycle and pedestrian facilities to support non-motorized travel. The traffic volumes between the Build and No-Build scenarios are the same. Refer to Attachment A for additional detail.

Go to STEP 6.

☐ **PROJECT OF AIR QUALITY CONCERN.** *Check the following options to see if your project is one of the following options. If yes, the project could be of local air quality concern and requires quantitative hot-spot analysis based on interagency review.*

Examples of POAQC that are covered by 40 CFR 93.123(b)(1)(i) and (ii)

- *New or expanded highway projects with a significant number of, or increase in, diesel vehicles (e.g., 125,000 AADT and 10,000 (8%) diesel truck traffic) Note: These metrics are examples and should not be considered as threshold levels.*
- *Project affecting intersections that are at LOS D, E, or F with a significant number of diesel vehicles, or those that will change to LOS D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.*
- *New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location.*
- *Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location.*
- *Projects in or affecting locations, areas, or categories of sites that are identified in the PM10 and PM2.5 applicable implementation plan or implementation plan submissions, as appropriate, as sites of violation or possible violation.*

Examples of POAQC that are covered by 40 CFR 93.123(b)(1)(iii) and (iv)

- *A major new bus or intermodal terminal that is considered to be a "regionally significant project" under 40 CFR 93.101.*
- *An existing bus or intermodal terminal that has a large vehicle fleet where the number of diesel buses increases by 50% or more, as measured by bus arrivals.*

[8] Refer to EPA's 2021 guidance, EPA-420-B-21-037, and FHWA's FAQ document, for complete details.
[9] Listed in Pg. 1 under "Instructions"

STEP 5: ANALYSIS AND DOCUMENTATION (for POAQC)

The following is a summary of documentation to be included for a quantitative PM hot-spot analysis. Please refer to the EPA Quantitative Hot-Spot Guidance for more information. [10] *IAC review and concurrence are required on the modeling protocol before the modeling begins. Contact your MPO representative and Air Quality Coordinator for additional guidance.*

Documentation to Be Included for the Quantitative PM Hot-spot Analysis:

- Description of project
- Description of type of emissions considered in the analysis.
- Contributing Factors
    - Air Quality
    - Transportation and traffic conditions
    - Built and natural environment
    - Meteorology, climate and seasonal data
    - Adopted emissions control measures
- Consider the full-time frame of the area's LRTP
- Description of existing conditions
- Description of changes resulting from the project
- Description of models, methods, and assumptions
- Description of analysis years
- Types of emissions included in the analysis and the details of emissions modeling.
- Results of air dispersion modeling.
- Background concentration estimation methods and results.
- Design value calculation.
- Discussion of why the project will not cause a violation of either the annual or 24-hour standard.
- Discussion of any mitigation measures
- Conclusion on how the project meets conformity requirements.
- Documentation of any IAC decisions on the latest planning assumptions used in the analysis.
- Documentation of any public comment on the latest planning assumptions used in the analysis.

[10] See EPA Quantitative PM Hotspot Analysis Guidance, EPA-420-B-21-037, October 2021; Accessed at https://www.epa.gov/state-and-local-transportation/project-level-conformity-and-hot-spot-analyses#pmguidance

STEP 6: PUBLIC AND IAC INVOLVEMENT

Fill out this section after the checklist is sent to the MPO and the project is presented at the SJV Project Level Conformity Group Meeting.

A. SJV Project Level Conformity Group Meeting Date: December 17, 2025

B. Summary of IAC comments received and responses*:*

EPA requested clarification on the project lane configuration shown in the plans. The project team responded that the project consists of four travel lanes total (two in each direction) with a continuous two-way left-turn lane (TWLTL) provided for access and safety. Additional turn lanes at select intersections result in five or six striped lanes locally, but do not increase the number of through travel lanes. This configuration is consistent with the RTP modeling. Caltrans requested clarification on how the project is programmed in the FTIP and recommended a follow-up meeting with FCOG to confirm consistency with RTP and FTIP listings and to address any potential amendment needs.

C. Summary of public comments received and responses*:*

The draft conformity material was posted on FCOG's (https://www.fresnocog.org/project-level-conformity/) and was available for the public comment period from December 4 through December 15, 2025. No comments were received during this public comment period.

D. IAC Concurrence Date(s):

December 17, 2025

Additional Information on Traffic Data

Attach traffic data tables, maps, and other graphical representations of the project to supplement information in Step 3.

Attachment A. Additional Project Detail

Step 1: PROJECT IDENTIFICATION

D. Project Description:

The project aims to rectify the current issues along Clinton Avenue, with a specific focus on the bottleneck between Valentine Avenue and Marks Avenue. This congestion not only leads to traffic delays but also impedes various modes of transportation. The project would widen Clinton Avenue from 600 feet west of Marks Avenue to Valentine Avenue. The roadway would be widened from three lanes undivided with a continuous left-turn lane to four lanes. Additionally, it would install sidewalk and Class II bicycle facilities. It would also include new streetlights, curbs, gutters, and curb ramps; box culvert improvements; power pole relocation; and signal loop modification.

Step 4: POAQC DETERMINATION

NOT PROJECT OF AIR QUALITY CONCERN

The project does not meet the criteria for a Project of Air Quality Concern as defined in the final rule by Code of Federal Regulations, Title 40, Section 93.123(b)(1). The project is consistent with project examples that are not a local air quality concern under the Code of Federal Regulations, Title 40, Section 93.123(b)(1)(i) and (ii), because the project would primarily serve gasoline vehicle traffic (does not involve a significant number or increase in the number of diesel vehicles), is designed to improve traffic flow and vehicle speeds, and would not involve any increases in idling. Such projects are expected to have a neutral or positive influence on PM emissions. Additionally, the project is listed in the 2025 FTIP as an exempt project that is not anticipated to result in substantial emissions. The project would provide new bicycle and pedestrian facilities to support non-motorized travel. Additionally, the traffic volumes between the Build and No-Build scenarios are the same for both 2025 and 2046. The traffic volume increase from 2025 to 2046 is due to natural growth in the area, and there is no correlation between additional traffic and the project.

Clinton Avenue Widening Project

Federal Project Number: STPL-5060(417)
FTIP: FRE250001

10/23/2025

OVERVIEW

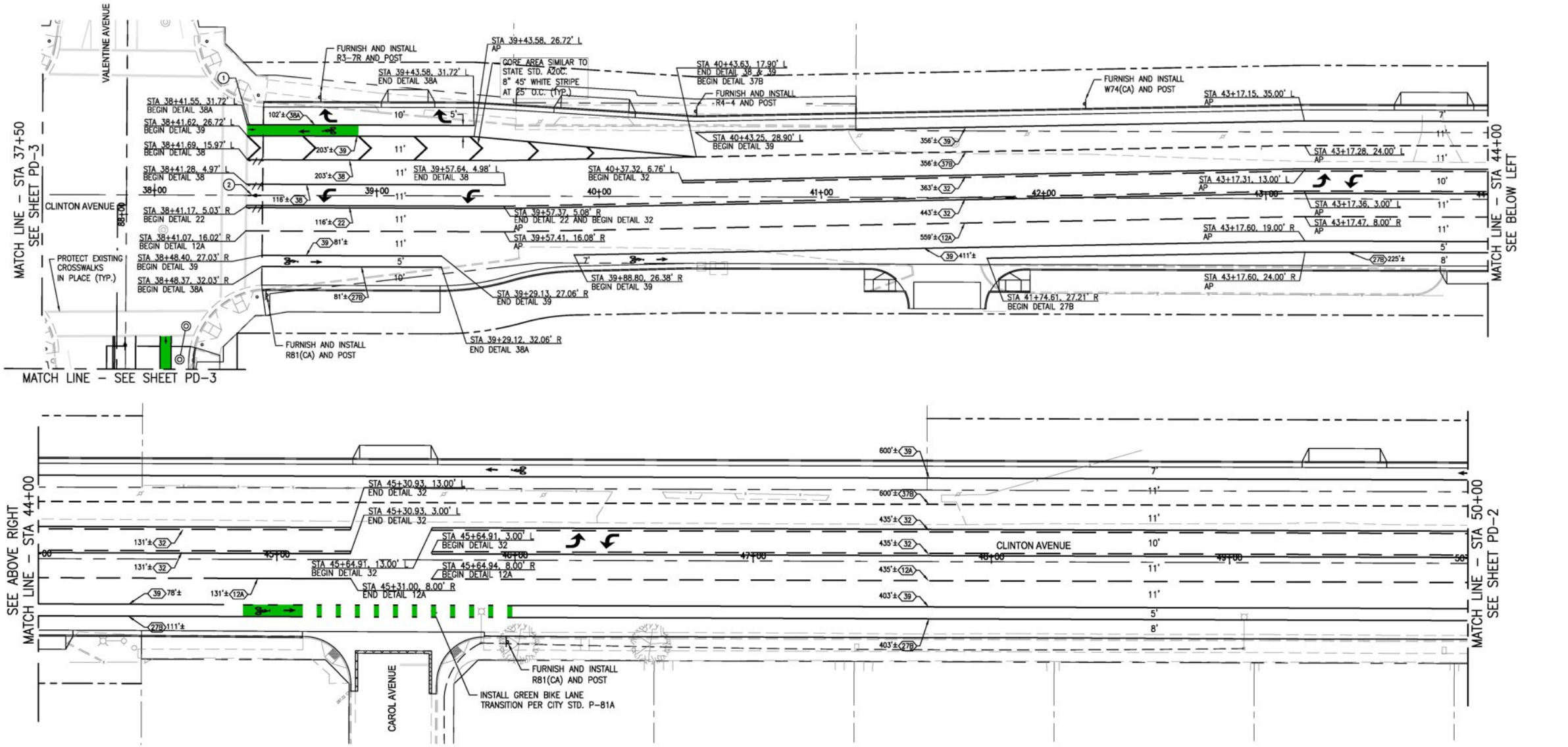
- Project Description
- Project Location
- Purpose and Need
- Project Listing in the FTIP
- Traffic Data
- Project Schedule
- Project-Level Conformity Summary

PROJECT DESCRIPTION

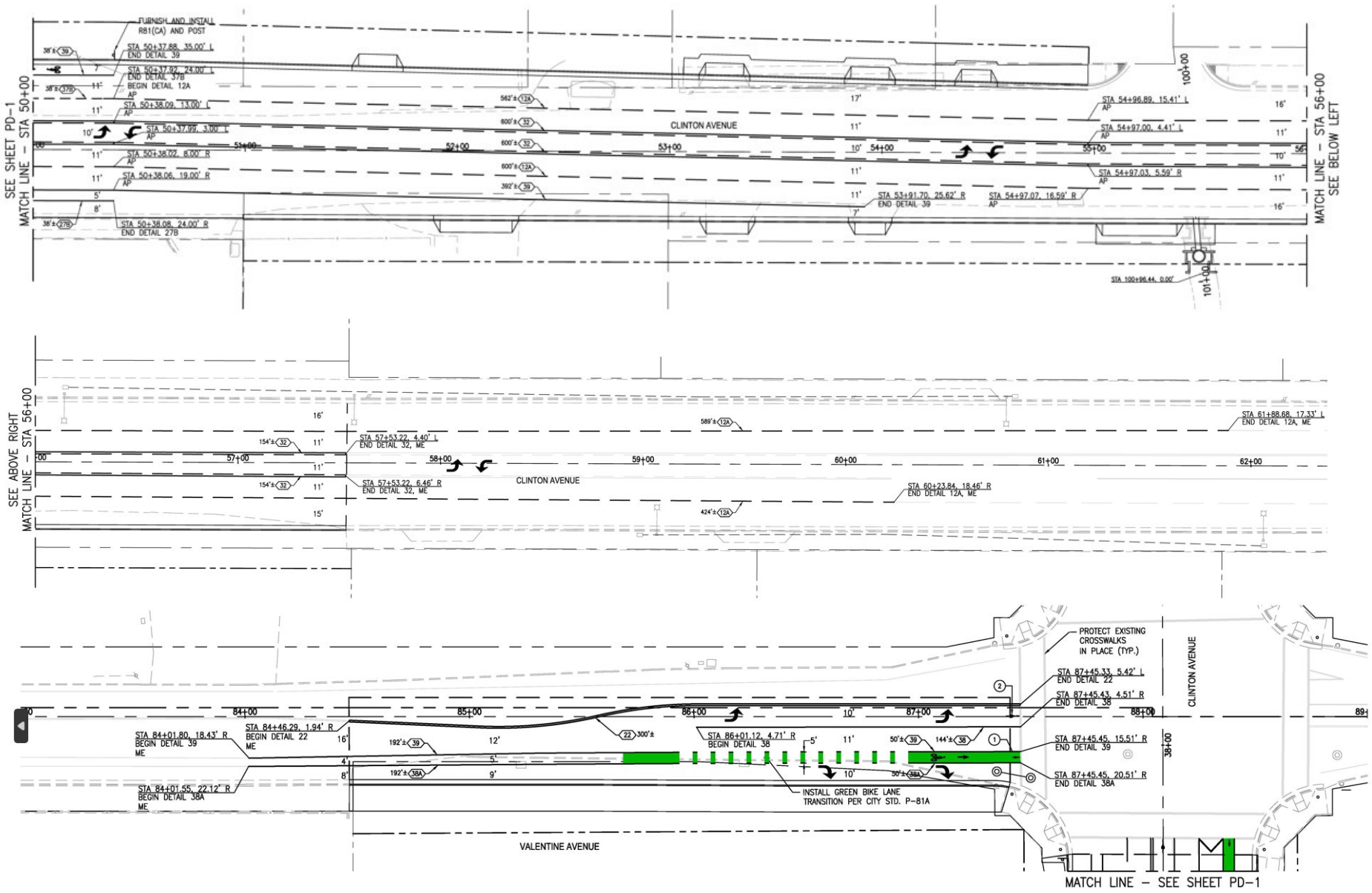
- Widen Clinton Avenue from 600 feet west of Marks Avenue to Valentine Avenue
- Aims to rectify the current Clinton Avenue congestion, specifically bottleneck between Valentine Avenue and Marks Avenue
- Widen roadway from three lanes undivided with a continuous left-turn lane to four lanes
- Install sidewalk and Class II bicycle facilities
- New streetlights, curbs, gutters, and curb ramps; box culvert improvements; power pole relocation; and signal loop modification
- Project does not meet the criteria for an exempt project under 40 CFR 93.126 or 93.128

Project Location
City of Fresno, Fresno County

PROJECT DRAWINGS PART 1



PROJECT DRAWINGS PART 2



PURPOSE AND NEED

Purpose

- Relieve congestion and facilitate alternative modes of transportation
- Accommodate current and future traffic volumes, support the growing community, and provide a safer, more efficient transportation route for residents, businesses, and visitors

Need

- Clinton Avenue connects various neighborhoods, schools, and businesses
- Existing roadway is characterized by narrow lanes and worn pavement
- Insufficient to accommodate the growing traffic
- Congestion during peak travel times
- Safety concerns for both motorists, bicyclists, and pedestrians

PROJECT LISTING IN THE FTIP

- Included in the regional emissions analysis conducted for the conforming 2025 FTIP and the 2022 RTP/SCS
- Design concept and scope have not changed from what was analyzed in the regional emissions analysis. Project footprint slightly reduced.
- NEPA Assignment 23 U.S.C. § 327 – Categorical Exclusion with technical reports

2025 FTIP UPDATE
GROUPED PROJECT LISTING
6/25/2024
(DOLLARS IN $1,000)

AGENCY	FTIP	GROUPED LIST PROJECT #	PROJECT ID #	PROJECT TITLE	PROJECT DESCRIPTION
Fresno, City of	25-00	FRE020617	FRE250001	Clinton Avenue between Marks and Valentine Avenues	Clinton: 500' W of Valentine to Marks; 3LU to 4LU, sidewalks, Class II bike lanes with MMA, curb, gutter, curb ramps, streetlights, culvert extension & relocate utilities

FUND	PRIOR	FY24/25	FY25/26	FY26/27	FY27/28	FUTURE	FUND TOTAL	TOTAL COST
STBG	$0	$0	$0	$0	$3,703	$0	$3,703	
Local	$0	$0	$0	$0	$2,264	$0	$2,264	$5,967

PROJECT SCHEDULE

Date	Preliminary Engineering/ Environmental	Engineering	Right-of-Way	Construction
Start	2025	2024	2025	2028
End	2025	2027	2027	2028

TRAFFIC DATA

- Traffic volumes, including truck trips, would be the same under Build and No-Build conditions for both the opening year (2028) and horizon year (2046) scenarios.
- The traffic volume increase from 2025 to 2046 is due to natural growth in the area.

	No Build (2028)	Build (2028)	No Build (2046)	Build (2046)
Annual Average Daily Traffic (AADT)	16,500	16,500	23,545	23,545
Truck AADT	239	239	342	342
% Trucks	1.45%	1.45%	1.45%	1.45%

PROJECT-LEVEL CONFORMITY SUMMARY

The project does not meet the criteria for a Project of Air Quality Concern. Project is consistent with project examples that are not a local air quality concern under Code of Federal Regulations, Title 40, Section 93.123(b)(1)(i) and (ii) because:

- The project would primarily serve gasoline vehicle traffic (does not involve a significant number or increase in the number of diesel vehicles), is designed to improve traffic flow and vehicle speeds.
- The project would not involve any increases in idling.
- Such projects are expected to have a neutral or positive influence on particulate matter emissions.

Additional reasons why the project is not a POAQC are:

- Project is listed in the 2025 FTIP as an exempt project that is not anticipated to result in substantial emissions.
- The project would provide new bicycle and pedestrian facilities.
- The project is intended to accommodate anticipated regional growth, and traffic volumes, including truck trips, would be the same under Build and No-Build conditions.

QUESTIONS

For further information or questions, please contact the Project Manager Garine Kendoyan, City of Fresno at (559) 621-8651.

Trinity Consultants

MEETING MINUTES

San Joaquin Valley Project-Level Conformity Working Group

Project-Level Conformity Determination for

Clinton Avenue Widening Project, City of Fresno, Fresno County

Meeting Minutes
Wednesday, December 17, 2025, 1:00 – 1:30 (PT)
The meeting was held via Zoom teleconference.

Attendees

- SJV AQ Coordinator (Trinity Consultants): Suriya Vallamsundar, Alex Marcucci
- FCOG: Matthew Shimizu
- City of Fresno & Project Team: Garine Kendoyan, Sharon Toland (Harris & Associates)
- StanCOG: Nick St Cook
- KernCOG: Vincent Liu
- MCAG: Shunyi Hi
- Caltrans HQ: Rodney Tavitas, David Deel, Kevin Hernandez Rios
- Caltrans District 6: Ken Romero
- EPA: Lindsay Wickersham, Zack Menzo
- FHWA: Chris Dresser

Meeting Summary

- Introductions
  Commencing the meeting, AQ Coordinator provided opening remarks and conducted a call to establish the attendance of all participants.

- Review of Non-Exempt Projects for the Project-level Particulate Matter (PM) Conformity
  - Introductions and Project Overview: AQ Coordinator introduced the Clinton Avenue Widening Project in the City of Fresno, Fresno County.
  - Project Presentation: City of Fresno project team presented the project details and the reasoning behind the proposed project-level conformity determination.
  - Public Comment Period: FCOG informed the group that all project-level materials were available for public review on the COG website from December 04 – December 15, 2025. No comments were received during this public comment period.

- Discussion
  EPA requested clarification on the project lane configuration shown in the plans. The project team responded that the project consists of four travel lanes total (two in each direction) with a continuous two-way left-turn lane (TWLTL) provided for access and safety. Additional turn lanes at select intersections result in five or six striped lanes locally, but do not increase the number of through travel lanes. This configuration is consistent with the RTP modeling. Caltrans requested clarification on how the project is programmed in the FTIP and recommended a follow-up meeting with FCOG to confirm consistency with RTP and FTIP listings and to address any potential amendment needs.

- Determination
  EPA and FHWA concurred that the project is not a project of air quality concern (POAQC).

- Closing Remarks and Adjournment

AQ Coordinator informed the group that the final hot spot materials and meeting minutes will be posted to the FCOG's website. FCOG will then send a final email to IAC, documenting the concurrences received.