



ADVISORY

DISTRICT INTERIM CEQA CRITERIA AND GHG POLLUTANT THRESHOLDS

Previously, Mendocino County Air Quality Management District has issued a recommendation that agencies use adopted Bay Area CEQA thresholds for projects in Mendocino County. In an effort to resolve any conflicts or issues between Bay Area standards and MCAQMD rules, the following clarifications are offered:

- ◇ **Indirect Source Rule** – The Districts Indirect Source Rule [Regulation 1, Rule 1-130(i)(1)] has established a definition of an “Indirect Source” which sets a higher standard than the Bay Area Threshold for ROG and NO_x emissions. It is more appropriate to use this local standard although it was not adopted as a CEQA threshold. These standards should be used for “indirect operational emissions” such as vehicle trips.
- ◇ **Stationary Source Emissions Levels** – MCAQMD has higher allowable emissions from stationary sources because local air quality meets all Federal Standards. The BAAQMD standards for NO_x and ROG were directly based on Federal Standards for permitting in the Bay Area. Projects in Mendocino County should use the MCAQMD figures for NO_x and ROG of 40 TPY.
- ◇ **CO Standards** – MCAQMD’s indirect and permitting rules allow 125 TPY of CO. Local hot spots of CO resulting from traffic congestion must still be accounted for using a health based screening level approach.
- ◇ **Greenhouse Gas** – No GHG or Risk Reduction Plans have been adopted using CEQA, therefore no local projects can use those documents to support a CEQA determination.
- ◇ **Risk Exposure** – Modeling of Risk Exposure should be conducted using EPA, ARB, or CAPCOA approved screening level modeling software. The District has no freeways or high volume roadways which need buffer zones at this time.
- ◇ **Odor** – The odor significance findings used by the BAAQMD do not conform to the District’s enforcement policy for odor complaints. Please contact the District for an evaluation for odor significance from existing facilities.

See the District’s website www.mendoair.org or phone 707-463-4354 for more information