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**MENDOCINO COUNTY**  
**AIR QUALITY MANAGEMENT DISTRICT**

**Date:** Thursday, October 07, 2010  
**From:** Christopher D. Brown AICP, Air Pollution Control Officer  
**To:** Planning Agencies and Planning Consultants  
**Subject:** Clarification of Interim CEQA Criteria and GHG Pollutant Thresholds

As you may be aware the Mendocino County Air Quality Management District recently issued a recommendation that agencies use the newly adopted Bay Area CEQA thresholds for Projects in Mendocino County (June 3<sup>rd</sup>, 2010 memo). Since then the District has been asked to clarify a number of issues and resolve some internal conflicts between the Bay Area Standards and MCAQMD rules. This memo formalizes those clarifications. A modified copy of the BAAQMD thresholds are attached.

- 1.) Indirect Source Rule – the District’s Indirect Source Rule (Reg 1 1-130[i1]) has established a definition of an “indirect source” which sets a higher standard than the Bay Area Threshold for ROG and NOX 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” (vehicle trips).
- 2.) Stationary source emissions levels – MCAQMD has higher allowable emissions from stationary sources because local air quality meets all Federal Standards (particularly Ozone). The BAAQMD standards for NOx and ROG were directly based on the Federal standards for permitting in BAAQMD. Projects in MCAQMD should use the NOx and ROG figures for MCAQMD (40 tpy).
- 3.) 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 (see item 5 below).
- 4.) No local Greenhouse Gas or Risk Reduction Plans have been adopting using CEQA therefore no local projects can use those documents to support a CEQA determination.
- 5.) Modeling of Risk exposure should be conducted using EPA, ARB, CAPCOA or BAAQMD approved screening level modeling software. The District has no Freeways of High volume roadways which need buffer zones at this time.
- 6.) The odor significance findings used by the Bay Area AQMD 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.

Please see the District’s website [www.mendoair.org/thresholds2010](http://www.mendoair.org/thresholds2010) for more information.

Please contact the District at 707-463-4354 with any questions.

Attachments