

**To:** Martin Rolph <[MartinR@helixepi.com](mailto:MartinR@helixepi.com)>

**Cc:** Abby Young <[ayoung@baaqmd.gov](mailto:ayoung@baaqmd.gov)>

**Subject:** RE: New GHG Thresholds

Hi Martin,

Thanks for this question. We agree with your assessment that a convenience store with gas pumps is a typical commercial land use and that the Air District's recommended climate impact thresholds adopted April 2022 can appropriately be used to evaluate this project. Of course, a lead agency has the discretion to use a different threshold for climate or air quality impacts as long as they provide the substantial evidence for that determination.

Hope this answer helped. If not please let us know.

Wendy

**Wendy Goodfriend, Ph.D.** | Acting Director of Planning and Climate Protection

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**Sent:** Wednesday, April 5, 2023 1:32 PM

**To:** BAAQMD CEQA <[ceqa@baaqmd.gov](mailto:ceqa@baaqmd.gov)>

**Subject:** New GHG Thresholds

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Dear BAAQMD,

I am working on an Air Quality and Greenhouse Gas Emissions analysis and report for a project in the City of Santa Rosa. The project, 43 Middle Ricon Road 7-Eleven, involves the demolition of an existing convenience store and constructing/operating a new, slightly larger convenience store with gas pumps.

The draft GHG analysis relies on BAAQMD's performance standard based GHG thresholds defined and justified in *the CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans* (April 2022). The City Attorney has raised a question about whether the new performance standard based thresholds are applicable to a convenience store and gas station project. The City's concern stems from the first two sentences in section 1.3 (Important Considerations for Using These Thresholds; p. 3) of the justification report:

*The Air District has developed these thresholds of significance based on typical residential and commercial land use projects and typical long-term communitywide planning documents such as general plans and similar long-range development plans. As such, these thresholds may not be appropriate for other types of projects that do not fit into the mold of a typical residential or commercial project or general plan update.*

Is a convenience store with gas pumps considered a typical commercial land use for which the thresholds were developed?

It seems to me that a convenience store with gas pumps is pretty typical (it is one of the retail land uses available in CalEEMod and the primary GHG sources are vehicle trips and building energy use) and would not be considered a "unique or unusual" project, but I would like to hear BAAQMD's opinion on this issue.

Thanks for your help, I'm most easily reachable at this email address or on my cell phone 530-306-7375,  
Martin

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**Martin Rolph**

*Air Quality/ Noise Specialist*

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