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April 30, 2018

RE: AB617 - Community Air Pollution Program (CAPP) Recommendation

The Northern Sonoma County Air Pollution Control District (NSCAPCD) is a small rural district of approximately 53,000 people in the north-northwest portions of Sonoma County, California. The primary industries are tourism and viticulture/wine making. The NSCAPCD has no commercial fossil fuel electrical generation and enjoys a high availability of clean renewable energy.

The NSCAPCD surveils its air quality through three particulate and one ozone monitor at “neighborhood scale” in its populated communities of Healdsburg, Cloverdale, and Guerneville. These monitors are in state and federal air monitor plans and meet all applicable data recovery and QA/QC requirements. The NSCAPCD is in attainment for all state and federal ambient air quality standards and was recently recognized by the American Lung Association in its “2018 State of the Air” report as having an “AA” grade for air quality; the highest grade it offers.

The NSCAPCD has a suite of community clean air incentive programs that provide financial incentives for: replacement of non-certified wood stoves; purchase of EVs and home EV chargers; construction and deployment of public EV charging sites; for Carl Moyer projects (especially focusing on agriculture); and ad-hoc vehicle pollution mitigation programs. Underpinning these incentive programs is NSCAPCD rule which requires permitted stationary sources to implement Best Available Control Technology for applicable minor and major sources, and in 1993 we introduced the first wood-burning appliance performance standard in district rule.

In 1976, the NSCAPCD was a founding partner of a “CAPP” which predates the AB617 model by over four decades with a documented track record of performance. In 1982, this CAPP became the “Geysers Area Monitoring Program” (GAMP), a consortium to address communities being impacted by over a dozen major sources of H₂S which resulted in non-attainment. The consortium was comprised of air districts, state and federal government, industry, and community stakeholders. Working together, the consortium implemented an extensive monitor network, established case-by-case BACT determinations for sources, established strict testing regimens, and implemented extensive public outreach and meetings. Through these efforts, this program has maintained attainment with the state H₂S, and all the state and federal ambient air quality standards, since 1991.

After thoughtful review of the NSCAPCD program status and the available air monitoring data, the NSCAPCD has determined that it has no CAPP recommendation to bring forward at this time.

Sincerely,

Robert Bamford
Executive Officer / APCO
Northern Sonoma County Air Pollution Control District