

Monterey County Planning and Building Inspection Administration

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February 4, 2009

Mike Novo Director of Planning County of Monterey 168 west Alisal Street, 2nd Floor Salinas, CA 93901

Dear Mr. Novo:

I am submitting comments on the Air Quality Section of the DEIR for GPU5. These comments were inadvertently omitted from the letter from the Leagues of Women Voters of the Monterey Peninsula and the Salinas Valley. They supplement comment 34 regarding fermentation emissions.

1. P. 4.7- 16. The DEIR concludes VOC emissions from wineries would be within the 2030 AQMP emission inventory of 2,227 lbs/day. The AQMP shows growth in emissions of 1263.8 lbs/day between 2005 and 2030. The DEIR states wineries permitted under GPU5 would generate 318,290.5 lbs/year of VOC emissions or 905.3 lbs/day. These would be new emissions.

Data in DEIR Table 4.7-1, show that 28.5 % of emissions would be generated in September and 32.1% in October, two months of the ozone season. Based on annual VOC emissions identified above, approximately 90,712 lbs (3,024 lbs/day) would be emitted in September and 102,171 lbs (3,296 lbs/day) in October. These levels exceed emissions from wineries accommodated in the 2008 AQMP. Cumulative emissions from wineries should be found to have a significant and unavoidable adverse impacts on regional ozone levels.

2. P. 4.7-24. Table 4.7-7 identifies VOC emissions from a single artisan winery and a single full-scale winery. Daily emissions do not account for variation in emissions associated with fermentation and ageing. Data in DEIR Table 4.7-1, show that 28.5 % of emissions would be generated in September and 32.1% in October, two months of the ozone season. Based on these data, a single full-scale winery would generate 31,388 lbs (1,046 lbs/day) in September and 35,353 lbs (1,140 lbs/day) in October, far in excess of MBUAPCD's threshold of significance of 137 lbs/day. Full-scale wineries would have a significant and unavoidable adverse project level impact on regional ozone levels.

Thank you for your consideration.

Sincerely,

s/Janet Brennan

Janet Brennan
President
LWV of the Monterey Peninsula

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