



August 22, 2014

Mr. Matthias St. John, Executive Officer  
California North Coast Regional Water Quality Control Board  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403  
**VIA EMAIL:** [NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov)

Dear Mr. St. John:

Thank you for the opportunity to comment on the Draft General Waste Discharge Requirements for Discharges of Wine, Beverage, and Food Processor Waste to Land (WDR), and the Draft Requirements for the Facility-Specific Salt and Nutrient Management Plan (FSNMP).

We have reviewed the draft General WDR and FSNMP requirements and appreciate your Staff's efforts to develop a broad reaching WDR aimed at effectively protecting groundwater. Additionally, we have worked with industry groups to develop comments that best represent our industry as a whole and believe the Regional Board Staff needs more time to come to an understanding with our industry as to what requirements are appropriate for achieving this overall goal.

As such, we offer our support and request your careful consideration of:

- The Wine Institute Environmental Working Group's technical comments regarding the Draft General WDR—in short, show us the science!
- California Sustainable Winegrowing Alliance's comments regarding Facility-Specific Salt and Nutrient Management Plan (FSNMP) requirements

These comments best represent our winery's concerns, questions and suggested path forward to developing a WDR and FSNMP that Staff and industry can agree will protect groundwater without imposing regulatory burdens that are disproportionate to the benefits they might offer. We look forward to working with you on the development of an effective WDR and FSNMP.

Sincerely,

A handwritten signature in dark ink, appearing to read "George Phelan".

George Phelan  
Dunnewood Winery Manager

CC: [Mona.Dougherty@waterboards.ca.gov](mailto:Mona.Dougherty@waterboards.ca.gov)  
[Rachel.Pratt@waterboards.ca.gov](mailto:Rachel.Pratt@waterboards.ca.gov)  
[Rhonda.Raymond@waterboards.ca.gov](mailto:Rhonda.Raymond@waterboards.ca.gov)