

FETZER

August 22, 2014

North Coast Regional Water Quality Control Board
Division of Watershed Protection, Russian River Unit
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403

Attn: Ms. Mona Dougherty

Re: **Comments on the draft-WDR order No. R1-2014-0041**

Dear Ms. Dougherty,

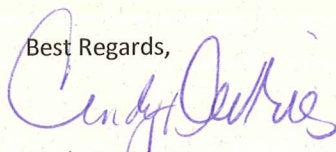
We support the North Coast Regional Water Quality Control Board's effort to protect the high quality groundwater found in the California North Coast Region, but also support food processors, breweries and wineries acting in environmentally responsible means in pursuit of their crafts. We have many concerns about the draft Wastewater Discharge Requirements (WDR) and believe they merit further evaluation.

More rigorous technical evaluation is needed before the draft-WDR can conclude that Biochemical Oxygen Demand (BOD) in land-applied treated process wastewater from food processors, breweries and wineries causes metal mobility in soils and groundwater degradation. For this reason, we feel that the proposed BOD limits are premature. We are very concerned that testing for many additional constituents proposed as part of the new WDR comes at significant additional expense. We are also very concerned about the new Total Dissolved Solids limits and the ramification of facilities permitted under historical requirements being able to successfully meet the proposed requirements. We support the robust BMPs required by certified members of the California Sustainable Winegrowing Alliance, and believe this program's BMPs meet and/or exceed the BMPs outlined in the proposed Facility-Specific Salt and Nutrient Management Plan. Additionally, we ask that you consider grandfathering in existing wastewater ponds as engineered and under current operation, as to avoid costs associated with liners and clay compaction.

We support the Wine Institute's scientific and technical concerns about the draft-WDR. We also support the United Wine Growers' concerns about the inconsistencies in policy and draft format.

Fetzer Vineyards is committed to responsible and sustainable business practices, and protecting our natural resource is an important part of business model. We believe these additional proposed regulations will cause undue burden to businesses like Fetzer Vineyards that are already invested in acting responsibly.

Best Regards,



Cindy DeVries
Chief Operating Officer
Fetzer Vineyards

FETZER
THE EARTH FRIENDLY WINERY

Bonterra
VINEYARDS

**RED
CLAY**
SANCTUARY

JEKEL
VINEYARDS

BEL ARBOR
Vineyards