

Gerald C. Forest  
Buckingham Valley Vineyards  
Buckingham, Pennsylvania 18912  
215-794-7188

March 1, 1982

Mr. Steve Simon  
Research & Regulations Branch  
BATF  
1200 Pennsylvania Avenue  
Washington, D.C. 20226

Dear Mr. Simon:

This is to comment on the establishment of a viticultural area called "Central Delaware Valley".

I believe the area as defined in the petition listed in the Federal Register volume 46, No. 233, 27 cfr Part 9 is much too narrow and confining, and would be misleading to the public.

The term "Delaware Valley" is commonly used to describe an area ranging from the State of Delaware up to Easton, Pa.; extending East and West of the Delaware River from ten to thirty miles. There are many examples to support this definition.

The enclosed page from the Lower Bucks County telephone book lists more than 35 business firms using "Delaware Valley" as part of their name. The total number of firms using "Delaware Valley" as part of their name in the entire Philadelphia area exceeds several hundred.

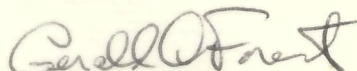
The Delaware Valley Fuel Oil Dealer Association has members ranging from Norristown to Central Jersey, and Allentown to Wilmington.

The Philadelphia area television stations promote themselves as serving the entire Delaware Valley.

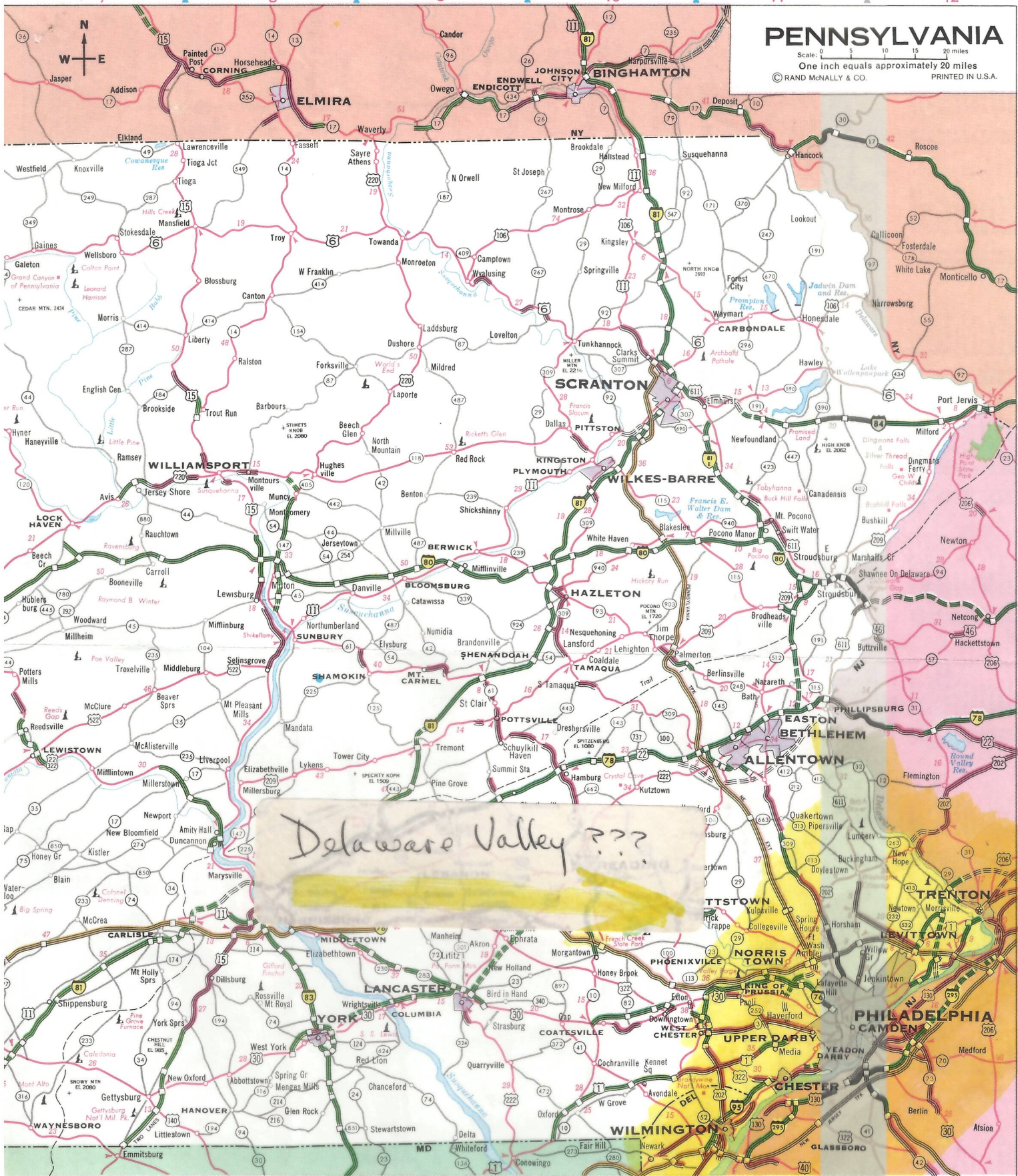
Geographically "Central Delaware Valley" could be better defined as an area with downtown Philadelphia as its centerpoint. The area listed in the petition might be named "A Very Narrow Section of the Northern Part of the Delaware Valley Only Close to the River".

Thank you for accepting my comments.

Cordially,

  
Gerald C. Forest





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Lansford.....D-10	Mercer.....C-2	Munhall.....E-2	Oxford.....G-10	Punxsutawney.....D-4	Scranton.....C-10	Tamaqua.....D-10	Waynesboro.....G-7
Lebanon.....F-9	Myersdale.....G-4	Myerstown.....F-9	Palmerston.....D-10	Quakertown.....E-11	Selinsgrove.....D-8	Titusville.....D-10	Waynesburg.....G-2
Lehighton.....D-10	Middleburg.....E-8	Nanty Glo.....E-4	Palmyra.....F-9	Reading.....F-10	Shamokin.....D-9	Towanda.....B-9	West Chester.....G-11
Lewisburg.....D-8	Middletown.....F-8	Nazareth.....E-11	Patton.....E-9	Red Lion.....G-8	Sharon.....C-1	Tower City.....E-9	West Chester.....G-7
Lewistown.....E-7	Mifflinburg.....D-8	Nesquehoning.....D-10	Philadelphia.....G-11	Renovo.....C-6	Shenandoah.....D-9	Troy.....C-8	W. Newton.....C-10
Lock Haven.....D-7	Milford.....C-12	New Bloomfield.....E-7	Philipsburg.....D-6	Ridgway.....C-5	Shickshinny.....D-9	Tunkhannock.....C-10	Wilkes-Barre.....C-2
McConeysburg.....G-6	Millersburg.....E-8	New Castle.....D-1	Pine Grove.....E-9	Roaring Spring.....F-5	Sinking Spr.....F-10	Turtle Creek.....E-2	Williamsport.....C-8
McKeesport.....E-2	Milton.....D-8	New Holland.....E-9	Pittsburgh.....E-2	Rochester.....E-2	Smethport.....B-5	Tyone.....E-5	Willow Grove.....F-4
McKees Rocks.....F-2	Monongahela.....D-8	New Kensington.....E-3	Pittston.....C-10	St. Clair.....E-9	Somerset.....G-4	Union City.....B-2	Windber.....F-12
Manheim.....F-9	Montgomery.....D-8	New Oxford.....E-8	Pleasant Gap.....D-6	St. Marys.....C-5	Spring City.....F-11	Uniontown.....G-3	Windsor.....F-4
Mansfield.....B-8	Montoursville.....C-8	Newport.....G-7	Plymouth.....C-10	Sayre.....C-9	State College.....E-6	Upper Darby.....G-11	Yeadon.....G-11
Masontown.....G-2	Montrose.....B-10	Newtown.....F-12	Port Allegany.....B-5	Schuylkill.....E-9	Sunbury.....D-11	Vandergrift.....E-3	York.....G-8
Meadville.....B-2	Mt. Carmel.....D-9	Norristown.....F-11	Pottstown.....E-9	Scottsdale.....F-3	Sunbury.....D-11	Washington.....F-1	Zelienople.....D-2
Media.....G-11	Muncy.....C-8	Oil City.....C-3	Pottsville.....E-9		Susquehanna.....A-8		

Aerosol



Valves

**PRECISION VALVE CORPORATION**

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February 28, 1982

Richard A. Mascolo  
Chief Research and Regulations Branch  
Department of Treasury  
Bureau of Alcohol, Tobacco and Firearms  
Washington, D.C. 20226

Dear Mr. Mascolo:

This letter is in reference to Notice No. 398-A Petition proposing a viticultural area to be known as Central Delaware Valley.

I should like to discuss similarities to Part I of said area.

The three acre, three year old vineyard, near the intersection of Routes 614 and 579 in Alexandria Township, lies within two and one-half miles of the Delaware River at the head of a tributary to the Hakiokake Creek which flows into the river at Milford, New Jersey. The vineyard area is frequently covered with morning fog.

At 600 feet, the vineyard is lower than the surrounding ridges. To the north, northwest, and west, the Musconetcong ridges rise from 700 to 900 feet. In fact, in boundary descriptions, Ellis Road near Route 519 crosses the ridge at 900 feet.

The geology of the vineyard area is the same as the Riegel Ridge Area and the soil the same as a large area north of Milford fronting on the Delaware.

I see no reason for boundaries to follow roads if a geographical area is to be designated. They can be drawn from point to point in straight lines as has been done in some areas.

I suggest that the areas of the Delaware tributaries be included in the Central Delaware Valley designation and that our vineyard be part of this viticultural area.

Sincerely yours,

KLAUS O. SCHREIBER  
Vice-President

KOS/az  
Copies:  
File copy

PRECISION VALVE CORPORATION

# BUCKS COUNTRY VINEYARDS

RT. 202 • R.D. 1 NEW HOPE, PA. • 18938 • 215-794-7449

February 9, 1982

Chief, Regulations & Procedures Division  
Bureau of Alcohol, Tobacco and Firearms  
P.O. Box 385  
Washington, D.C. 20044-0385

Gentlemen:

In response to yours of January 13 soliciting comments on the proposed Central Delaware Valley Viticultural Area, I feel strongly that this plan should be put aside now. There is insufficient evidence that this small area is indeed different. The plan excludes Buckingham Valley Vineyards and Franklin Hill Vineyards, which other than ourselves, are the only other commercially producing vineyards and wineries in this area. There has been no significant growth of grapes nor production of wines from this area to indicate the need for this designation.

We are the only commercial winery in this area and we do not feel that there is any evidence worthy other than lines on a map to delineate a wine growing area. The only service performed here would be establishing exclusiveness before there is a meaningful record of actual production of grapes and wine from this area.

When there are actual vineyards producing grapes and wine from those grapes, then there will be evidence that this is indeed a bonafide viticultural area. Until that time, and I would hope some day that there will be evidence of the special nature of this region, elitism is served, not the public interest.

Sincerely Yours,



Bucks Country Vineyards, Inc.  
Arthur Gerold, Pres.

AG/kg