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Chateau St. Jean

VINEYARDS AND WINERY

December 8, 1982

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

Att: Notice No. 432

Dear Sir:

In response to your solicitation for public comment I offer the following, with respect to the proposed "Green Valley-Sonoma County" appellation.

As a winemaker at a winery situated within the proposed area I can personally attest to the fact that the area does, in fact, lie within an area that is "coastal cool". However, there are some areas within the proposed appellation that do not satisfy the requirements of what is commonly called "region 1".

It is my considered opinion that more specific data is necessary with regard to an overall classification of region 1.

This proposed area will have ramifications for many growers and wineries. If at all possible I would like to see local hearings held to allow all concerned to express their opinions before further action is taken on this matter.

Sincerely,

E. B. Downs
Enologist
St. Jean Sparkling Wines

ED:pc

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CARMINE INDINDOLI

[REDACTED]
Sebastopol, CA 95472

December 6, 1982

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

Re: Opposition to Proposed "Green Valley" Viticultural Area

Dear Division Chief:

I wish to comment on Notice No. 432 (27 CFR Part 9) that deals with the proposed establishment of the "Green Valley" Sonoma County Viticultural area. I am a small grower of grapes and my property lies within the proposed boundaries.

I purchased my property in 1975 from an older couple, the Olivers, my present neighbors. Mrs. Oliver, age 80, was born on the property. During the course of many conversations with her she has always referred to our area as the "Vine Hill District" and the area West of Hwy 116 lying along Green Valley Creek as the "Green Valley District." While this alone should not be the deciding factor to reject the proposal, I believe there is much local acceptance of the two areas as I have described them.

In addition I recall one other relevant conversation which I will recount as best I can. While in the process of looking for a parcel of land on which to establish my home and vineyard I investigated two parcels -- my present one and another in the "Green Valley District." Long after purchasing my present parcel, I mentioned to Mrs. Oliver that I had made an offer on a parcel in the "Green Valley District." She laughed and said "You are a lucky fellow not to have bought anything in that cold swamp," and that I was "lucky to have found a place in the sun belt." Her statement coincides with my own conclusions about both places. I did not purchase the Green Valley parcel because of several very significant reasons.

The first one was that soil and water testing indicated a very high water table as well as a high likelihood of continued surface water movement due to nearby springs. This coincided with the local Sanitation Officer's comments that I would have to French drain the parcel in order to get a septic permit. This wet condition is very prevalent in the "Green Valley District."

The second reason was that upon questioning two vineyard owners in the "Green Valley District" having what I felt were very similar parcels, they both indicated that the growing area was very cold which delayed spring bud break. Wet soil conditions necessitated frost protection and had significantly later harvest dates than any other nearby area.

The parcel I chose had none of the aforementioned characteristics. The soil is well drained and deep. There is no delay in spring bud break. The growing conditions were warmer and rarely did any vineyards in the "Vine Hill District" have frost protection and if they did it was rarely

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used.

As a graduate engineer, not a viticultural expert, I chose the site more compatible with the novice grape grower.

In addition to the property search which was done in a manner consistent with my engineering training, I proceeded to do an investigation to determine the best suited wine grapes for my parcel.

I had studied at Napa and Santa Rosa Junior College and had taken University of California at Davis classes on the subject. I also read several books on the subject of grape growing. Thus supplied with the necessary information, I was able to make a choice.

Heat summation data for the area was available from a U.C. Davis-sponsored apple test block nearby. The local farm adviser and the viticulture instructor from Santa Rosa Junior College supplied me with their experience and opinions. The best sources of information however, were the grape vines themselves that grew in the adjacent lands. Early season grapes, Pinot Noir and Chardonnay, were successfully grown. Late to mid-season grapes such as Zinfandel and Petite Sirah were also successfully grown.

Since I also wanted to raise table and raisin grapes for my own consumption, I tried to find information about these grapes as well. I found one farmer who was trying to grow table grapes in the "Green Valley District." He said he was having lots of trouble and had yet to pick a grape. Several years later he abandoned the whole project attributing his failure to the wet soil, cold temperatures and short growing days due to the persistent early morning fog. I was discouraged about growing table grapes but did persist and found three early ripening table grapes I could buy and did a small planting as an experiment in spite of my reservations.

Feeling comfortable that I was in a mid to high Region II, I selected Chardonnay, Pinot Noir and White Riesling as my wine grapes and Perletter, Beauty Seedless and Delight as my table and raisin grapes. I have had considerable success with all of these varieties. My first crop was in 1979. My wine grapes have always ripened to sugar levels in excess of 22° Brix. My table grapes have always ripened and have been ripe enough for me to make raisins since 1980.

In 1979 after clearing another small piece of land I planted Cabernet Sauvignon, a late season grape, and discovered that it too grew successfully. My first crop of this variety in 1982 was picked at 23.2° Brix.

Recently a great deal of information about the "Green Valley District" was published in the local newspapers. There were many articles about the difficulties of growing grapes in the District, specifically Pinot Noir and Chardonnay were singled out and the various years' history of these grapes discussed.

In all of these same crop years mentioned in the articles, none of my grapes had any difficulty ripening. During these same years grapes from

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my vineyard consistently received prizes at the Sonoma County Harvest Fair for their wine. These were the 1979 White Riesling and Pinot Noir, the 1980 Chardonnay, Pinot Noir and White Riesling and the 1981 Chardonnay. I believe the 1982 Cabernet Sauvignon to be of this same high caliber.

I would like to point several other pieces of information particularly with regard to the contents of the petition submitted by Ms. Audrey Sterling. In the Geographical Viticultural Features Section, she states that . . . "The range of mountains lying along its western border breaks the fury of the ocean blast which sweeps up from the sea." In my observations the "Vine Hill District" is more influenced by these mountains. Furthermore the "Vine Hill District" has additional very significant features which shed light on why the conditions differ from "Green Valley." To the East the land drops down to the Santa Rosa plains, to the north the land falls away to Mark West Creek. The morning fog drains away to these areas very rapidly making the area sunny and warm early in the day. This confirms the statement by Mrs. Oliver about "the sun belt." It is these same features that allow frost-free conditions for most vineyards in the "Vine Hill District". In contrast the "Green Valley District" is mostly landlocked and actually traps both the fog and cold air resulting in the need for frost protection as stated in part by Ms. Sterling.

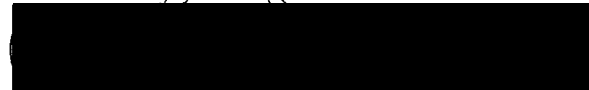
As to the question of water drainage, the predominant source of water drainage in the "Vine Hill District" is the Laguna de Santa Rosa, not generally Green Valley Creek.

As a dedicated wine enthusiast, I would feel that my interests were not being protected by this proposal. On the contrary my interests would be very incorrectly served.

As a wine grape grower, I would in all sincerity represent "Green Valley District" grapes as grapes that were grown west of Hwy 116 and west of the Laguna De Santa Rosa as "Vine Hill District."

I would recommend that the request be rejected as stated and that the Bureau hold local hearings to review the information from all representative vineyards as to better suited boundaries if an area designation is necessary.

Sincerely,



CARMINE L. INDINDOLI

CLI:sm

William H. Wright, III, PhD
[Redacted]
Sebastopol, Ca., 95472

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

Dear Sir:

I am writing in reference to Notice 432 "Sonoma County Green Valley Viticultural Area". I am a resident of this area, I am a wine drinker, and my property is adjacent to the vineyards of Ms. Sterling. I am opposed to this name "Green Valley" as usage for the wines of this area. I request a local hearing on the matter for the following reasons:

1. This area where I live is not locally known as Green Valley. The name is on the USGS Sebastopol 15' topographic quadrangle, but is not used as a local geographic term. I have lived here for almost 13 years, and have never used the term or heard anyone locally (some who have lived here since birth) use the term. The reason for this is that Green Valley is the name of the creek, not the valley. The valley that the creek runs through is a very narrow area and only includes about 15% of the total geographic area encompassed by the boundaries of the proposed viticultural area. The only major vinyard in the valley is that of Ms. Sterling, and it seems inappropriate to name such a large, diversified grape-growing region after the location of one vinyard. A more appropriate name would be "Molino", a local cultural name.
2. Other grape-growing areas included in the boundaries are much different in soil type and climate. On top of Vine Hill and to the East of this feature are several vinyards (Gallo, Dehlinger, Martini and Prati, Joseph Swan) which have much warmer climates and are capable of producing quality wines from grape varieties that need warmer weather (most notably cabernet sauvignon). Their wines will be much different from those described in the petition. Little or no frost protection is needed at these higher elevations.
3. The "Green Valley" in Solano County is locally known as its name, and it would be confusing to have two "Green Valley" viticultural areas..

I would not have known about this if I was not alerted by a neighbor. I have talked to other neighbors about this and they feel that there should be a local hearing on this matter. This could have a great effect on the acceptance of premium wines from this area in the greater wine community because many of them would not fit the definition of wine in the petition.

Thank you
[Redacted]
W.H. Wright, III, PhD.

cc. Cranston, Hayakawa, Clausen

Glenna Kormier

Sebastopol CA 95472

December 12, 1982

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

Attention: Notice No. 432

To whom concerned:

I am a resident of the area proposed for inclusion in the subject boundaries of the diverse viticultural area petitioned to be called "Sonoma Green Valley," and I am writing because:

1. The proposed name of the area within the outlined boundaries does not apply to the area actually included but only to a tiny portion of it.
2. The description of the area, in your "Geographical/Viticultural Features" misrepresents to a greater or lesser extent the microclimates and the varieties produced within these.
3. Portions of the description may well apply to viticultural areas south of Highway 12 as well as to some of the areas within the proposed boundaries. In these, long-term thermal graphs are underway and will not be complete until February.
4. I believe that a public hearing should be held in western Sonoma County to allow the input of other growers into this major decision-making process.

Very truly yours,

Glenna Kormier

cc:

DEC 6, 1982

(5)

CHIEF, REGULATIONS & PROCEDURES
DIVISION

BUREAU OF ALCOHOL, TOBACCO
& FIREARMS

P. O. BOX 385

WASHINGTON D. C. 20044-0385

SIR-

I WISH TO MAKE A COMMENT
CONCERNING NOTICE NO. 432
PROPOSING THE GREEN VALLEY
SONOMA COUNTY VITICULTURAL AREA,

I AM A GRAPE GROWER AND
WINE CONSULTANT IN THIS
PROPOSED AREA AND I FIND
THAT THE BOUNDARIES ARE NOT
CONSISTANT WITH THE PROPOSAL,
THEREFORE I REQUEST A PUBLIC
HEARING TO VOICE MY OPPOSITION
TO MY INCLUSION INTO THIS AREA,

IF THIS PROPOSAL PASSES OVER
OPPOSITION I WILL HAVE TO
CONSULT WITH MY ATTORNEY.

THANK YOU

MARK WESTON

FORESTVILLE, CALIF. 95436

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

Attn: Notice No. 432

Proposed: Sonoma County Green Valley Viticulture Area

I do not agree with the Sonoma County Green Valley Viticulture Area boundaries as proposed.

Our family vineyard lies along Martelli Road, Forestville, this road is approximately 3 miles in length and is perpendicular to River Road and Hwy 116. Our vineyard is partially within the requested boundaries of Green Valley. Our family has been growing grapes here since 1913 and produces grapes that are sold to wineries who use them for their well-noted full-bodied Zinfandel and Burgundy wines. These grapes bring

premium prices. The requested Green Valley boundaries splits off part of our vineyard and suggests that grapes grown in the region produce light-bodied wines. It is also stated that it is a "cool" region. Our vineyard is in a warmer thermal area than Iron Horse and has not had frost protection since 1913.

Boundaries to the south of the requested Green Valley boundary (Watertrough Road - south of Bodega Hwy) do not incorporate a parcel of land on Watertrough Road that I own. It is believed that the Green Valley distinctions proposed best describe more land to the south

and should expand the southern boundaries. Presently a geothermal graph is being done by the University of Calif. of the land just outside the Green Valley southern boundaries. This is being done to determine the area's heat units in relation to the type of grapes best grown there. I believe the study will provide important information relative to the proposed boundaries of Green Valley. Results of the study will be available in late January.

In re to Sonoma County Green Valley Viticultural Area: This is a very important boundary determination and much more input from other growers of this

area need to be considered before
determining the boundaries.

Sincerely,

[Redacted]

Lee P. Martinelli

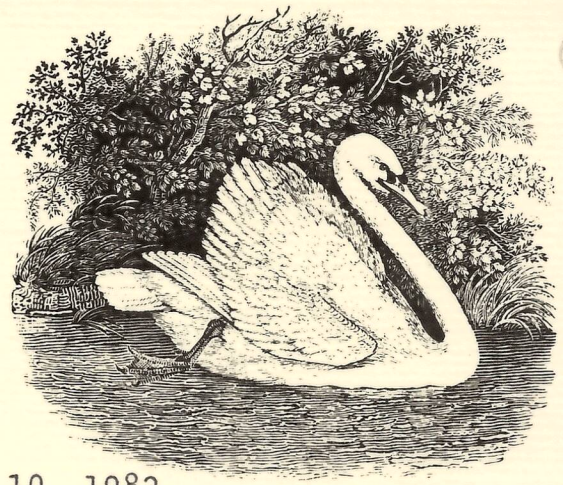
[Redacted]

Forestville, Ca 95436

707-887-1281

Joseph Swan Vineyards

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



December 10, 1982

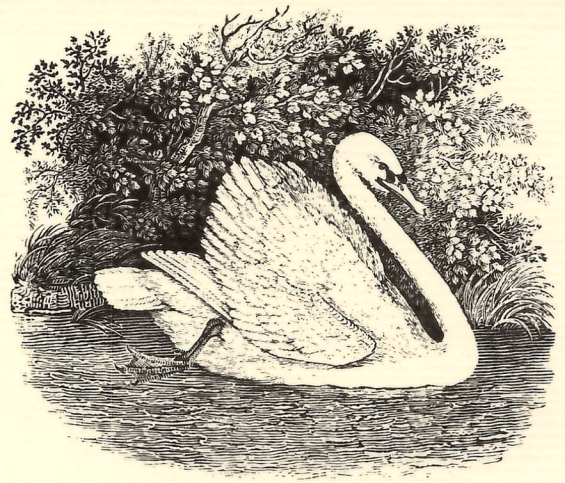
Dear Sir,

As a winegrower with interest in proposed viticultural areas in my vicinity I would like to comment on your Notice # 432, under 27 CFR Part 9, which proposes to establish a "Green Valley-Sonoma County" viticultural area.

My wife and I own 10.5 acres of grapes and operate a winery at 2916 Laguna Road which is approximately 3 miles due East of Forestville CA 95436. There are 5 acres each of Pinot Noir and Chardonnay and $\frac{1}{2}$ acre of Cabernet Sauvignon. I had been advised when I bought the property that it would not be advisable to plant either Zinfandel or Cabernet due to concerns as to ripening. My experience with my own small amount of Cabernet has changed my thinking. I do consider my area to be somewhat marginal as to growing Pinot Noir although I have done reasonably well with it. Our vineyard does ^{verge} ~~vege~~ on being too warm a location for Pinot Noir.

I have a Bonded winery, established in 1969, and have been making Zinfandel since then from purchased grapes. From 1972 and 1973 respectively, I have been making Pinot Noir and Chardonnay from our own grapes. A small amount of Cabernet has been made since 1974 from our grapes. The 1974 was good, the 1976 excellent and the 1981 and 1982 wines show very good

Joseph Swan Vineyards

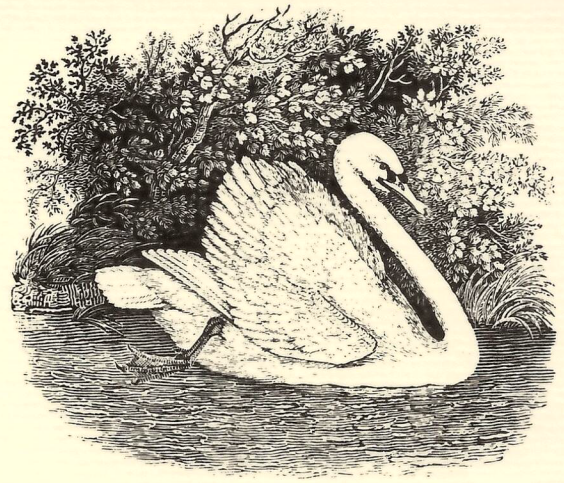


potential. In 1968, with the last of the original Zinfandel vines which were on the property when I purchased it in 1967, I made an outstanding wine on a home permit.

From the preceding paragraphs it seems evident that my region has differences from those described by Petitioner, as to climate and grape variety suitability. The difficulty I find with their Petition lies primarily in attempting to make the "Green Valley" designation too broad in a geographical sense. My experience over a 13 year period indicate more similarity to those of a near neighbor whose vines are in a similar climactic situation to ours. Thomas Dehlinger is commenting on the Petition and has included data in some detail. I concur with his conclusions and refer you to them. We have the same varieties planted in our vineyards.

From the foregoing it should be obvious that I come to somewhat differing conclusions as to which grape varieties are suitable in the proposed boundaries as laid out by Petitioner. However, my primary objection is that our vineyard and winery would be included in that area. The point of origin in Petitioner's bounding is not in Green Valley but certainly lies more appropriately in the Russian River Valley. Our property lies $\frac{1}{2}$ mile South of that point but is more correctly included in the drainage area of Laguna de Santa Rosa. Our property is also well to the East of Highway 116, (which many local people feel more accurately bounds the Eastern edge of Green Valley). A local road called Green Valley begins to the North of

Joseph Swan Vineyards



Frei Road just East of Highway 116, runs west into the valley itself and after traversing through it, climbs over hills on the West edge of the valley and ends at Highway 116. On December 9, Mr. Dehlinger and I made an aerial survey by flying in a rented aircraft over the whole area in question and I feel that I have supported my conclusions in so doing.

Petitioner states in (g) that it is necessary to use frost protection to raise grapes in this area. As a further indication that our geographical situations are different I have never used any frost protection and, in fact, have no such facilities. My grape losses due to frost have been nil over a ten year span.

A further difference I have with the Petitioner is the implication in (e) that wines from the proposed viticultural area are light. My experience and reputation would prove otherwise since I have consistently been making rich, full-bodied wines. I fear that publicists and winewriters might erroneously be influenced by such ill-founded assertions to the detriment of my Cabernets to say nothing of the mainstay of my Estate production which is Pinot Noir and Chardonnay.

To sum up, my primary objection is the the boundaries Petitioner has laid out. In my opinion the proposed name "Green Valley" is neith factual nor accurate. I strongly urge that the petition be denied unless redrawn to conform to the implications inherent in a designation such as "Green Valley".

Sincerely yours,

Joseph A. Swan

Dec. 3, 1982

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

Dear Sir -

I wish to comment on Notice No. 432 proposing the establishment of the "Green Valley - Sonoma County" viticultural area.

I am the owner of the Dehlinger Winery, located at the northeast corner of the intersection of Guerneville and Vine Hill roads, which is within the boundaries of the proposed viticultural area. I have been raising wine grapes here since 1975, have been keeping daily weather records and producing wine from grapes within the proposed area since 1976, and have been producing wine from my own grapes here since 1977.

The proposed viticultural area includes a large farming area, delineated approximately as the area east of state highway 116 and the town of Forestville, south of Mark West Creek, west of the Laguna de Santa Rosa, and north of the town of Sebastopol, which does

not conform to the representations of the petition in that it is not locally thought of as being part of the geographical Green Valley; its climate is substantially different from that described in sections c, d, e, and g of the Geographical/Viticultural Features part of the petition; and it yields wines which do not fit the description given in d and e of the above.

Local usage of the term Green Valley would require a survey larger than I could conduct, but on reading the petition yesterday I contacted six people who have been involved with agriculture grape growing or winemaking in this area for longer periods of time than I have; all said that Green Valley would include nothing east of Hwy. 116, some also said it would not include the Atascadero Creek area running from Graton south to Sebastopol.

Climate of the area in which I live is substantially warmer than that described in the petition, although it is cooler than the warmest parts on Sonoma County, such as Alexander Valley and Dry Creek, Section c states

that the area is a region 1 growing area as classified by the University of California at Davis system of heat summation by degree-days. My weather records over a seven year period show an average degree-day count of approximately 3200, meaning low region three. Frank Vanucci, winemaker at Martini and Prati Winery, located at Laguna and Vine Hill School roads, considers their winery to be in region 2. Section d states that the area is known to provide appropriate growing conditions for grapes which are best grown in cool climates, such as Chardonna and Pinot noir. My experience with both my own and purchased grapes is that this area also provides excellent growing conditions for later maturing varieties such as Zinfandel and Cabernet Sauvignon. For instance my own Cabernet Sauvignon over the last 5 years:

1978-	9.4 lb./vine	harvested Oct. 8 th	at 23.8° Brix
1979-	23.1 lb./vine	harvested Oct. 21 st	at 23.4° Brix
1980-	13.8 lb./vine	harvested Oct. 14 th	at 24.0° Brix
1981-	23.7 lb./vine	harvested Oct. 6 th	at 23.7° Brix
1982-	26.8 lb./vine	harvested Oct. 12 th	at 24.4° Brix

Section g states that water for frost protection is essential for successful viticultural activities in this area. However almost all of the vineyards in the area delineated at the bottom of page 1 of this letter grow successfully with no frost protection at all. My own vineyard, which has frost protection, has used it for a total of only four hours per year - and the need has been marginal.

Wines from this area are stated to be "lighter in body" in section e of the petition. Although the alcoholic content (body) of each wine will vary by vineyard, variety, and vintage, my own experience is that the Chardonnay, Pinot noir and Zinfandel from this area are normally very full bodied. The enclosed set of labels indicating the exact alcoholic content of my recent releases of these varieties show that it is all we can do to get these varieties harvested before the grapes are so high in sugar that the alcoholic content reaches 14%. From the sugar data reported for Cabernet Sauvignon on the previous page one can see that wines from this variety will have medium to medium full body.

Considering these facts I believe the proposed "Green Valley - Sonoma County" viticultural area, as presently described and delineated in the petition, is inaccurate and would mislead and confuse wine consumers. If this viticultural area were to become officially sanctioned with its presently proposed boundaries and description, wine writers and critics would erroneously begin to write that this area is not suitable for raising Zinfandel and Cabernet Sauvignon, and that the Chardonnay and Pinot noir are light in body. This misinformation would have a serious negative economic impact on my own operation and those of other small producers in this area.

I request that ATF reject the petition as presented, and that it hold a hearing locally to determine more accurate and suitable boundaries for the "Green Valley - Sonoma County" viticultural area.

Sincerely,



1979

PINOT NOIR

Sonoma County

DEHLINGER
WINERY

PRODUCED AND BOTTLED BY THE DEHLINGER WINERY
SEBASTOPOL, CALIFORNIA. ALCOHOL 13.7% BY VOLUME

1980

CHARDONNAY

Sonoma County

DEHLINGER
WINERY

PRODUCED AND BOTTLED BY THE DEHLINGER WINERY
SEBASTOPOL, CALIFORNIA. ALCOHOL 13.9% BY VOLUME

1981

CHARDONNAY

Sonoma County

DEHLINGER
WINERY

PRODUCED AND BOTTLED BY THE DEHLINGER WINERY
SEBASTOPOL, CALIFORNIA. ALCOHOL 13.8% BY VOLUME

1978

ZINFANDEL

Sonoma County

DEHLINGER
WINERY

BOTTLED JUNE 1980

87% ZINFANDEL; 13% PETITE SYRAH

PRODUCED AND BOTTLED BY THE DEHLINGER WINERY
SEBASTOPOL, CALIFORNIA. ALCOHOL 13.8% BY VOLUME

1979

ZINFANDEL

Sonoma County

DEHLINGER
WINERY

87% ZINFANDEL; 13% PETITE SYRAH

PRODUCED AND BOTTLED BY THE DEHLINGER WINERY
SEBASTOPOL, CALIFORNIA. ALCOHOL 13.9% BY VOLUME

1980

ZINFANDEL

Sonoma County

DEHLINGER
WINERY

79% ZINFANDEL; 21% PETITE SYRAH

Martini & Prati Wines, Inc.

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BONDED WINERY NO. 881

2191 LAGUNA ROAD
SANTA ROSA, CALIFORNIA 95401
TELEPHONE 707-823-2404

December 13, 1982

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

Dear Sir:

I wish to disagree with the boundaries mentioned in Notice No. 432 proposing to establish Green Valley, Sonoma County viticultural area.

I am the owner of Martini & Prati Wines, Inc.; Which is and has been the largest winery in the area mentioned, since late 1800. We are located at Laguna Road and Vine Hill School Road.

I would say we are Region (2), but this area has been known as "THE TRENTON, VINE HILL AREA". Trenton at one time had a U. S. Post Office and a winery.

I have no objection to a Green Valley Area, but the eastern boundary should not extend beyond State Highway # 116.

Very truly yours,

Martini & Prati Wines, Inc.

Elmo Martini, President



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December 14, 1982

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

Attn: Mr. Robert White

Re: 432 Green Valley Appellation

Dear Mr. White:

I am the owner of Quail Hill Vineyard which is approximately a 60 acre parcel with Chardonnay and Pinot Noir vines. I am located within the area requested as Green Valley.

I am categorically opposed to the application and respectfully request that it be quashed. Green Valley has no significance whatsoever even within the local area, as any kind of a referred to region except that the applicant happens to have his vineyard and winery at that location. This application is without question an effort to give a distinction only for self serving purposes of Iron Horse Winery and would result in confusion to the consumer because it is arbitrary.

The region outlined in the application is commonly known as the Russian River Valley of Sonoma County and there are some broad standards of microclimate and soil conditions relevant to the area. This application has received strong support for that reason, and because the area is a well known geographic entity in its own right. To arbitrarily imprint Green Valley on this area which has no local or consumer identification would result in the type of confusion that such appellations are meant to avoid.

Therefore, I ask again that this application be voided or at least be open for public hearing before further procedural action be taken. Very few growers read the Federal Register and I am confident there would be a ground swell of negative reaction if the Bureau took action on this arbitrary application without proper local notice.

Sincerely yours,

A black rectangular redaction box covering the signature of Lynn C. Fritz.

Lynn C. Fritz
Quail Hill Vineyard

LCF:cw

FRITZ COMPANIES, INC.

FRITZ PLAZA • 735 MARKET STREET • SAN FRANCISCO, CA 94103 • (415) 393-8360