

# MJC Vineyard

A Virginia Farm Winery & Nursery

Route 1, Box 293  
Blacksburg, VA 24060  
(703) 552-9083

August 10, 1982

Chief  
Regulations & Procedures Division  
Bureau of Alcohol, Tobacco, Firearms  
Washington, D. C. 20226

Dear Sir:

We are submitting comments regarding the proposed viticultural area, "North Fork of the Roanoke", in response to your request of July 27, 1982, in 47 FR 32448-32450.

As the petitioner for the district, we support the proposed rule as published in the Federal Register.

You particularly solicited comments on two substantive questions. These were:

- (1) "The proposed viticultural area is a 22 mile long valley with only 49 acres of grapes; therefore, could the boundary be reduced in size to include just the five vineyards?"

Although the valley is 22 miles long, the area within the valley that is suitable for fine wine grape production is limited to a narrow band that averages just two acres in depth between the elevations of 1700 and 2100 feet. This fruitful band is broken periodically by forests and rock-falls that leave much of the land untillable. An estimated 1100-1200 acres conceivably could be developed here for agricultural purposes. But the probability of actual development of wine grapes is more nearly 20% or 230-240 acres. Both current and projected future vineyards necessarily will be scattered widely along this narrow band of suitable land.

Subdistricts within the valley (e.g. McDonald's Mill, Luster's Gate, Ellett, Yellow Sulfur, Elliston, etc.) are indistinguishable in terms of factors that affect grape quality. Hence, separate viticultural designations within the valley would be difficult to support. Yet, the valley as a whole is clearly distinguishable from surrounding areas, both with respect to microclimate and to the soil of its most productive slopes.

For these reasons, it would seem to be fully consistent with ATF criteria to consider the entire 22 mile length of the North Fork of the Roanoke as an integral, certifiable district for purposes of 27 CFR Part 9.

- (2) "ATF is also particularly interested in comments regarding the viticultural name."

The proposed name -- "North Fork of the Roanoke" -- is accurately drawn. It is consistent with historical documents dating to the eighteenth century, and continues in common use today. In May, 1982, the Montgomery County (Virginia) Planning Commission recommended that the agricultural zoning for the North Fork area be strengthened to avoid adverse future development. The Commission also voted to encourage the Commonwealth to designate the county road that traverses the North Fork (Rt 785) as an official Virginia By-Way and scenic route, adding further to the North Fork's regional prominence.


Nonetheless, the name of the proposed district may be too long for practical purposes of labelling. Some contraction of the proposed name -- within limits of correct and popular usage -- might be considered by the BATF. Three alternatives were considered earlier by petitioner. Each was rejected as being too parochial, too imprecise, or insufficiently documented. These were:

- \* "North Fork". Comment: An appellation of "North Fork" would be recognized locally, but the name would have little currency elsewhere since every major stream in the East probably has its own "north fork."
- \* "Roanoke Valley". Comment: An appellation of "Roanoke Valley" would be widely recognized. It would apply geographically to the area of the North Fork but not exclusively. Indeed, the Roanoke Valley follows the Roanoke River from its origins on the North Fork some 400 additional miles to the Atlantic Ocean. For North Fork people to seek to usurp the whole of the Roanoke Valley for their appellation might be considered to be ungracious as well as geographically imprecise by fellow Virginians and North Carolinians alike.
- \* "North Roanoke Valley". Comment: "North Roanoke Valley" is geographically more precise than "Roanoke Valley" alone as an appellation for the North Fork area. But this appellation is not used in popular or historical maps or documents, as is "North Fork of the Roanoke" or its simple contraction: "North Fork of Roanoke."

All this said, the petitioner would be content either with "North Fork of the Roanoke" or "North Fork of Roanoke." Either is correct. Each appears to meet ATF standards for designation of viticultural areas. All other factors being equal, the simple contraction may be preferred to the literal but cumbersome name: "North Fork of the Roanoke."

We hope that these comments will be helpful to you in concluding your rulemaking.

Sincerely,

  
Karl T. and Myra C. Hereford  
Proprietors, MJC VINEYARD

August 18, 1982

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

Dear Sir:

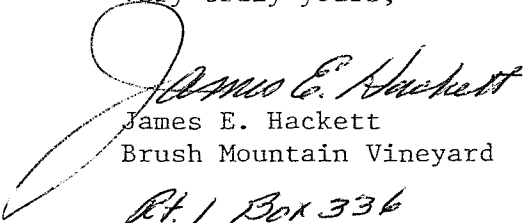
I am writing to support the proposal to establish a viticultural district in southwest Virginia entitled "North Fork of Roanoke," as published in FR 32448-32450.

Our vineyard is located in the upper reaches of the North Fork of Roanoke and lies within the boundaries of the proposed viticultural district in the southeastern foothills of Brush Mountain. We are currently completing a planting of two acres of Chardonnay with an additional three to five acres of vinifera scheduled for development in 1983. Eventually we would like to fully utilize the 15 to 20 acres of the favorable fruiting zone that lies within our property for production of the fine European varieties of wine grapes that are suited to this preferred zone. Our wine grape production is committed to MJC VINEYARD, the regional farm winery on the North Fork.

You asked for comments about the name of the proposed viticultural district. The name is fine. It is commonly accepted here. It enjoys a broader reputation as well, particularly through the work on grapes at Virginia Tech's vineyard on the North Fork, and for its close association with the Jefferson National Forest and Appalachian Trail, both nationally recognized recreational assets here.

I also feel certain that a number of other farms will wish to produce grapes in the North Fork area, now that the fruiting zones have been clearly delineated and much of the guesswork eliminated in grape production. The presence of the regional farm winery gives us all the economic incentive and market to make our own family investments. In this regard, I would hope that you would view the entire 22 miles as one unified area for purposes of designating a viticultural area, rather than limiting the area to the vineyards currently in production.

Very truly yours,

  
James E. Hackett  
Brush Mountain Vineyard

*Rt. 1 Box 336  
Blacksburg Va 24060*



## VIRGINIA POLYTECHNIC INSTITUTE AND STATE UNIVERSITY

Blacksburg, Virginia 24061

ENVIRONMENTAL AND URBAN SYSTEMS—LANDSCAPE ARCHITECTURE

August 25, 1982

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

RE: North Fork of the Roanoke  
 Viticultural District  
 (47 FR 32448-32450 7/27/82)

Dear Chief:

I am writing in support of the proposal to establish a viticultural area in Southwest Virginia entitled, "North Fork of the Roanoke."

The valley of the North Fork of the Roanoke River is well suited to the production of the best of the American, hybrid, and European grapes as demonstrated initially by Virginia Tech's fruit scientists and in recent years by a number of farm vineyardists. These sites are limited to a narrow stretch of land about half way up the southeastern and north slopes of the two mountain ranges that enclose the valley of the North Fork. Temperature, sun orientation, moisture, and soil combine in this ribbon of land to provide excellent growing conditions for early to early mid-season cultivars of wine grapes. Because of the terrain, not every site within this unique zone is available for grape production. Many remain in timber. Accordingly, the valley will support a fairly limited number of widely separated but very similar vineyards, most of which are now and will continue to be under 15 to 20 acres. For this reason, it would seem to be most appropriate to designate the entire 22 mile valley as a single viticultural district.

The name elected for the proposed district is well established here, in both historical and contemporary documents, and in current useage. Virginia Tech's grape hybridization program of the past decades, plus the location of the North Fork area in relation to the Appalachian Trail, Jefferson National Forest, and Bi-Centennial Bike Trail, lend the area a genuine regional and national recognition as well. I would judge that the designation, "North Fork of Roanoke," would enable potential consumers readily to identify the area in the East where the area's wines are grown.

Thank you for the opportunity to comment upon your proposed rule.

Very truly yours,

A handwritten signature in cursive script that reads "Benjamin C. Johnson".

Benjamin C. Johnson  
 Professor of Landscape Architecture

/pli



**MONTGOMERY COUNTY PLANNING COMMISSION**

PO BOX 806 CHRISTIANSBURG VIRGINIA 24073 TEL. (703) 382-1431 EXT. 240

August 19, 1982

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

RE: North Fork of the Roanoke Viticultural Area (47 FR 32448-32450, 7/27/82)

Dear Chief:

The Montgomery County Planning Commission would like to offer the following comments concerning the North Fork of the Roanoke Viticultural Area:

1. In Montgomery County, some of the area proposed for this Viticultural Area is presently in Agricultural and Forestal District No. 2, established by the Board of Supervisors of Montgomery County pursuant to the Agricultural and Forestal Districts Act (AFDA) enacted by the Virginia General Assembly in 1977. The AFDA provides policies and procedures by which agricultural and forestal land and operations may be protected and enhanced as an economic and environmental resource. In this regard, the Planning Commission believes that designation of this Viticultural Area is consistent with the goals and objectives of AFDA, in addition to county land use policy.

2. The Montgomery County Planning Commission supports the establishment of the North Fork of the Roanoke Viticultural Area as proposed in 47 FR 32448-32450, July 27, 1982.

In reference to the August 10, 1982 letter to you from Karl T. and Myra C. Hereford, Proprietors, MJC VINEYARD, the Montgomery County Planning Commission wishes to clarify two comments made in the letter.

1. On page 2 under comment (2) it is stated: "In May, 1982, the Montgomery County (Virginia) Planning Commission recommended that agricultural zoning for the North Fork area be strengthened to avoid adverse future development".

This recommendation actually came from one of several ad hoc committees established by the Montgomery County Planning Commission to conduct a mandated fifth-year review of the Comprehensive Plan. While the Planning Commission has duly noted this recommendation, to date it has not officially endorsed it as a draft revision to the Comprehensive Plan which would have to be forwarded to the Montgomery County Board of Supervisors for adoption as county policy.

Chief  
August 19, 1982  
Page Two

2. On page 2 under comment (2) it is stated: "The Commission also voted to encourage the Commonwealth to designate the county road that traverses the North Fork (Route 785) as an official Virginia By-Way and scenic route . . ."

Again, this recommendation came from one of the ad hoc committees established to review the Comprehensive Plan. As in the previous comment, to date the Planning Commission has not officially endorsed this recommendation as a draft revision in the Comprehensive Plan.

It is anticipated, however, that both of the above ad hoc committee recommendations will be incorporated into the Planning Commission's revision of the Comprehensive Plan which should be completed by the end of 1982.

The Montgomery County Planning Commission appreciates the opportunity to submit these comments concerning the North Fork of the Roanoke Viti-cultural Area.

Sincerely,

*Robert L. Rogers/gvh*

Robert L. Rogers, Chairman  
Montgomery County Planning  
Commission

RLR/gvh

Enclosures



# NEW RIVER VALLEY PLANNING DISTRICT COMMISSION

P. O. BOX 3726  
RADFORD, VIRGINIA 24143  
PHONE (703) 639-9313

COUNTIES OF:  
FLOYD · GILES  
MONTGOMERY  
PULASKI

TOWNS OF:  
BLACKSBURG  
CHRISTIANSBURG  
PULASKI

CITY OF:  
RADFORD

August 18, 1982

## MEMORANDUM

To: Montgomery County Planning Commission

From: Mark Batterson

Subject: Viticultural Area designation along the North Fork of the  
Roanoke River

Karl Hereford of Route 785 in the Roanoke Valley has asked me to bring before the Planning Commission his proposal to establish a viticultural area in parts of Roanoke and Montgomery Counties.

The petition from MJC Vineyard to the Bureau of Alcohol, Tobacco and Firearms is basically to allow wineries to designate better the specific grape-growing areas from which their wines come and will enable consumers to identify better the wine they purchase.

Dr. Hereford's petition applies to a 22-mile valley of the North Fork of the Roanoke. Currently there are five vineyards in the designated area with approximately 49 acres under cultivation. MJC Vineyard is the only bonded winery in the proposed area.

This petition seems to strengthen and support the significance of agriculture, agricultural zoning, and agricultural and forestal districts in Montgomery County. Dr. Hereford would like the Planning Commission to support his petition to the Bureau of Alcohol, Tobacco and Firearms.

