



-----Original Message-----

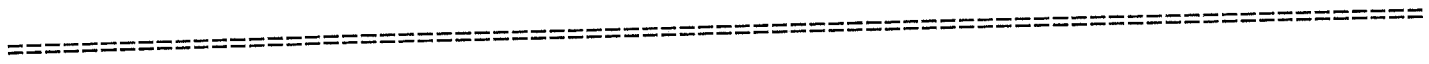
From: Pershkov, Barry I. [mailto: [REDACTED]]
Sent: Sunday, January 12, 2003 12:58 PM
To: nprm@atfhq.atf.treas.gov
Subject: '965'

name=Barry Pershkov
name=None
Address1=[REDACTED]
Address2=
City=Washington
State=DC
Zip Code=20008

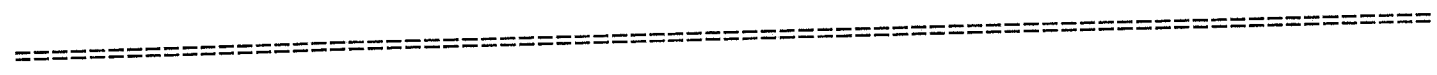
Comments=I strongly oppose the expansion of the Russian River Valley AVA. If anything, the Russian River Valley AVA should be made smaller to reflect the uniqueness of that area. The proposed 767 acres falls outside that area. Any wine produced from it would mislead wine buyers into believing that those grapes were grown in the famed Russian River Valley appellation.

If the Ferrari-Carano winery, wines from which I do enjoy by the way, desires to produce a Russian River Valley wine, it should be required to purchase grapes from that area, not purchase land outside that area and then seek to have it redesignated.

For the reasons set forth above, the ATF should not promulgate the proposed rule.



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Comment 2



KORBEL

SINCE 1882

California Champagne, Wines and Brandy

F. KORBEL & BROS., INC.

13250 RIVER ROAD, GUERNEVILLE, CA 95446-9538

(707) 824-7000

FAX (707) 869-2981

1/13/2003

Chief, Regulations Division
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 50221
Washington, DC 20091-0221
(Attn: Notice No. 965)

RE: Support for Notice 965

Dear Sir or Madam;

I have been a winemaker with Korbel Champagne Cellars for the past 18 years, making millions of gallons of wine from grapes grown in the Russian River Valley American Viticultural Area (RRV). Korbel has been active in grape growing and winemaking in the RRV area for over 120 years. Over the past 18 years, Korbel has purchased many tons of grapes from the area around Fulton, including the area proposed for inclusion into the RRV in this proposal. Korbel also purchases large quantities of grapes from other portions of the RRV and from numerous other growing regions.

As a sparkling winemaker, I blend wines with subtle nuances, made from grapes grown in various parts of the RRV and other AVAs. I consider myself to be very familiar with the nuances of Pinot Noir and Chardonnay from the different parts of the RRV. I can state with great assurance that the area between Fulton road and Hwy 101, proposed for inclusion in the RRV in Notice 965, is very true-to-type for the RRV.

While Korbel has not purchased any grapes from the proposed expansion area in the last couple of years, I would have no hesitation of doing so in the future, and including these wines in our RRV labeled blends. In fact, one of the reasons we do not currently purchase grapes from this area, is that it does not comply with current label claims we make for RRV on some of our premium cuvees. This is a shame, because the quality of the grapes grown in this area is easily on a par with other nearby vineyards that are within the existing RRV boundaries.

Sincerely,

Paul Ahvenainen
Senior Winemaker
Korbel Champagne Cellars
(707) 824-7605

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NOTICE # 965



-----Original Message-----

From: Dallas Jones [mailto: [REDACTED]]

Sent: Thursday, January 23, 2003 10:00 AM

To: nprm@atfhq.atf.treas.gov

Subject: Proposed Expansion of the Russian River Valley Viticultural Area

All of these rules are not in the public interest and the government has no business in this. This is purely for commercial purposes and does not directly benefit the public. The industry itself should be solely responsible for this action.

Dallas Jones



Kingwood, TX 77339-2931



it is their duty, to throw off such Government,



January 22, 2003

Chief, Regulations Division
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 50221
Washington, DC 20091-0221
Fax: 202-927-8525
(Attn: Notice No. 965)

Re: Donald L. Carano petition for Proposed Expansion of the Russian River Valley
Viticultural Area: Subject of Federal Register, Vol. 86, No. 5, dated Wednesday, January
8, 2003 – Request for Comments

To whom it may concern:

We are members of the Board of Directors of Russian River Valley Winegrowers (RRVW). The RRVW association represents approximately 95% of the vineyard acreage within the current Russian River Valley boundaries with its membership of 150 growers and 50 wineries. Our ongoing responsibility is to monitor and serve as watchdogs of the integrity of the appellation.

This letter is in reference to the petition to expand the boundaries of the Russian River Valley American Viticultural Area (AVA) submitted by Donald L. Carano. We are in agreement with most of the basic tenets of that petition. However, we believe that the proposed expanded boundaries do not comply with the requirements of the applicable statutes. There is substantial acreage outside the proposed expanded boundaries that is not significantly different, and in many cases is identical, to land within the proposed area of addition.

One of the purposes of AVA regulations was to eliminate consumer confusion. We feel that approval of this petition, as presented, will promote consumer confusion in two ways:

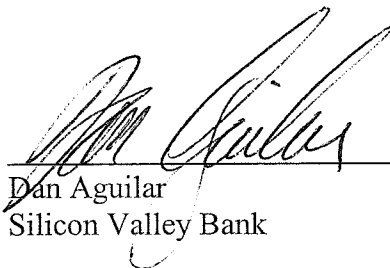
First, there is no difference in climate, soils, elevation or wine character in the areas immediately outside the proposed expanded boundaries. Thus, it will be impossible to explain to consumers how the land within the proposed boundary area is different from the land immediately beyond it. The original petition, which established the boundaries of the Russian River Valley AVA in 1983, used convenient features such as county roads for boundary lines. It was submitted without due consideration that the geologic, geographic and climatic features of this and other adjacent areas were the same. Like the original 1983 petition, Carano's petition to expand the boundaries of the Russian River Valley AVA is incomplete.

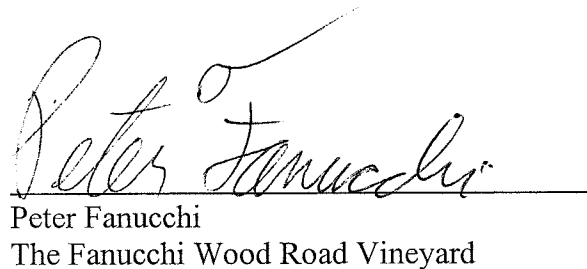
Secondly, because the adjoining areas are, if not identical, very similar to the proposed area, approval of this petition will undoubtedly lead to additional petitions filed either by individual growers or groups of growers, each with ample evidence that their small areas should be included as well. This process would create tremendous consumer confusion.

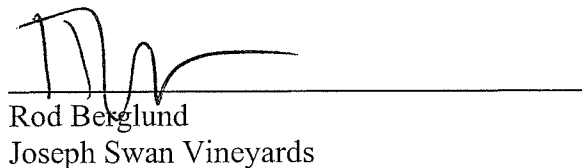
On January 17, 2003, the Russian River Valley Winegrowers submitted a petition dated January 15, 2003, amending the boundaries of the Russian River Valley AVA. Our petition would include that area proposed by the Carano petition, but would not be subject to the fatal flaws contained within that same petition in its selection of boundary lines. The proposed boundaries in the Carano petition do not comply with the requirements of the statutes governing appellation boundary determination as set forth above.

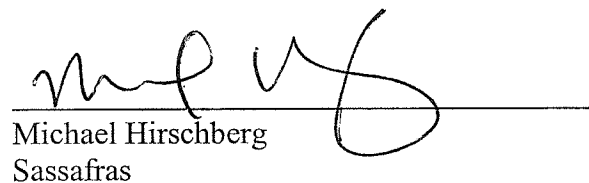
At the request of our entire Russian River Valley Winegrowers' membership, we respectfully request that the Carano petition be subsumed into our recently submitted petition.

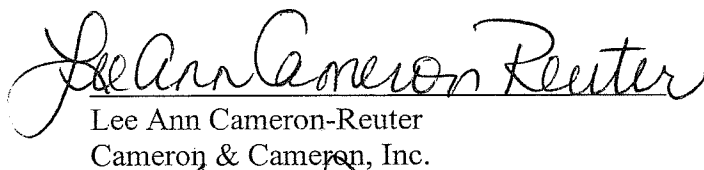
Sincerely,

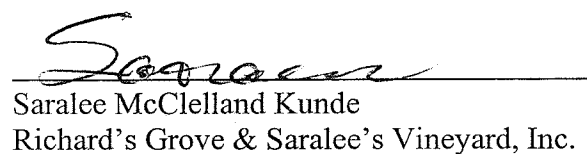

Dan Aguilar
Silicon Valley Bank

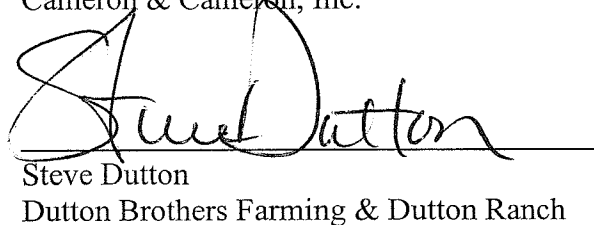

Peter Fanucchi
The Fanucchi Wood Road Vineyard

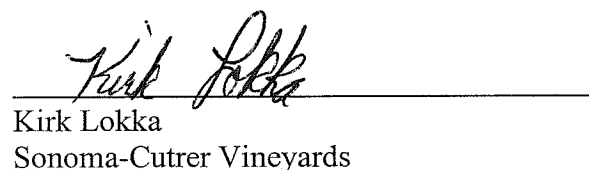

Rod Berglund
Joseph Swan Vineyards

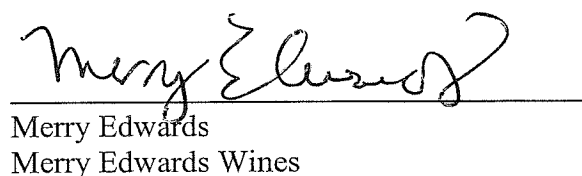

Michael Hirschberg
Sassafras

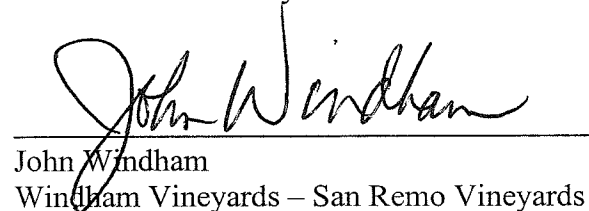

Lee Ann Cameron-Reuter
Cameron & Cameron, Inc.


Saralee McClelland Kunde
Richard's Grove & Saralee's Vineyard, Inc.


Steve Dutton
Dutton Brothers Farming & Dutton Ranch


Kirk Lokka
Sonoma-Cutrer Vineyards


Merry Edwards
Merry Edwards Wines


John Windham
Windham Vineyards – San Remo Vineyards



425 Aviation Boulevard, Santa Rosa, California 95403 USA
Tel 707-544-4000 • Fax 707-569-0105 • www.kj.com

Chief
Regulations Division
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 50221
Washington, DC 20091-0221

February 6, 2003

Attn: Notice No. 965

Dear Sir or Madam:

Following is my response to your request for comments on the Proposed Expansion of the Russian River Valley Viticultural Area.

This expansion satisfies all the criteria outlined in Title 27 CFR 4.25a(e)(2) for proposing an American viticultural area (AVA). The proximity of the proposed area to the existing AVA means it is a certainty that the proposed area satisfies the principal distinctive characteristic of the Russian River Valley Viticultural area as stated in Treasury Decision ATF-159 of October 21, 1983; "...a significant climatic effect from coastal fogs."

This AVA was originally established almost 20 years ago. It seems reasonable and proper to modify AVA's to include vineyards that satisfy the original criteria but were not included in the original petition or have been planted since the establishment of the AVA.

I respectfully ask that you approve the expansion of the Russian River Valley Viticultural area.

Sincerely,

E. B. "Pete" Downs
Vice President for Government Affairs
Kendall-Jackson Wine Estates



PARADISE RIDGE

BYCK FAMILY ESTATE VINEYARDS & WINERY

January 27, 2003

Chief, Regulations Division
Bureau of Alcohol, Tobacco, and Firearms
P.O. Box 50221
Washington, DC 20091-0221
Fax 202-927-8525
(Attn: Notice No. 965)

Re: Donald L. Carano petition for proposed expansion of the Russian River Valley Viticultural Area: Subject to Federal Register, Vol. 86, No. 5, dated Wednesday, January 8, 2003 – Request for comments

To whom it may concern:

My husband and I have been members of the Russian River Valley Winegrowers (RRVW) since 1985. The RRVW association represents approximately 95% of the vineyard acreage within the current Russian River Valley boundaries with its membership of 150 grape growers and 50 wineries.

This letter is in reference to the petition to expand the Russian River Valley American Viticultural Area (AVA) submitted by Donald L. Carano. Even though we are in agreement with most of the basic tenets of that petition, we feel strongly that it does not comply with the requirements of the applicable statutes. There is substantial acreage outside the proposed expanded boundaries that is not significantly different, and in many cases identical, to land within the proposed area of addition. We feel that approval of this petition, as presented, will promote consumer confusion in two ways:

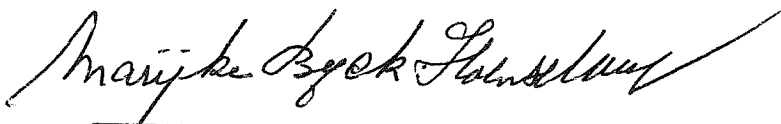
First, there is no difference in climate, soil, elevation or wine character in the areas immediately outside the proposed expanded boundaries. For instance, Paradise Ridge Winery was not considered by Mr. Carano's proposal. Secondly, because the adjoining areas are, if not identical, very similar to the proposed area, approval of this petition will undoubtedly lead to additional petitions filed by individual growers each with ample evidence that their small areas should be included as well. We feel this process will create terrific consumer confusion.

On January 17, 2003 the Russian River Valley Winegrowers submitted a petition dated January 15, 2003, amending the boundaries of the Russian River Valley AVA. This

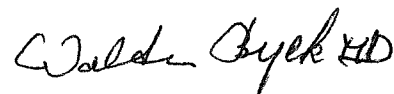
petition would include that area proposed by the Carano petition, but would not be subject to the fatal flaws contained within that same petition in its selection of boundary lines. The proposed boundaries in the Carano petition do not comply with the requirements of the statutes governing appellation boundary determination.

We respectfully request that the Carano petition be subsumed into the recently submitted petition from the Russian River Valley Winegrowers'. We feel that this is the most accurate way to create a factual and scientifically based Russian River Valley AVA that will not confuse consumers and growers alike. Please take this letter into consideration when deciding on above-mentioned issues.

Sincerely,



Mrs. Marijke Byck-Hoenselaars
Owner, Paradise Ridge Winery



Dr. Walter Byck
Owner, Paradise Ridge Winery