

INDIAN DITCH RANCH
587 REFUGIO ROAD
SANTA YNEZ, CALIFORNIA
93460

January 1, 1983

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

Attention: Notice No. 435

Dear Sir:

I wish to register my support of the Santa Ynez Valley viticultural area as it has been proposed by the Firestone Vineyard. The area is well defined and in my opinion not too large. There are micro-climates within the area, but there are also micro-climates within individual vineyards. In looking at the proposed area compared to other grape growing areas within Santa Barbara County, there is a definite difference in climate and most importantly the grapes and wines produced.

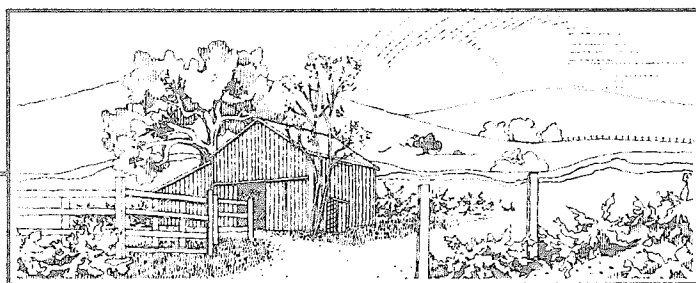
I have tasted all wines made at the Santa Ynez Valley Winery, which is about one half mile down the road. They have used grapes from eleven different vineyards within Santa Barbara County in addition to grapes from outside the county. These grapes have come from the Santa Maria Valley, the Los Alamos area and the Santa Ynez Valley. I believe the grapes grown in the Santa Ynez Valley and more importantly, the wines produced from those grapes, have a character that sets them apart from the wines and grapes grown in the surrounding areas.

The grape growing area definitely is not too large. A great deal of the area is mountains and not suitable for viticulture. These unusable areas were included in the application for ease of defining the area. There are areas that have been approved that are larger and more diverse than this proposal. Notice Number 442 for the Ohio River Valley is for an area almost 100 times large than the proposed Santa Ynez Valley area.

I urge you to approve the application as it has been submitted.

Sincerely,


William H. Davidge



J. CAREY CELLARS

Chief, Regulations & Procedures d January 5, 1983
Bureau of Alcohol, Tobacco, & Firearms
P.O. Box 385
Washington D.C. 20044-0385

Gentlemen:

I am writing in response to the notice published in the Wine Institute Bulletin, No. 82-12A, Dec. 21, 1982, in which it was announced that the "Santa Ynez Valley" was under consideration as a viticultural area.

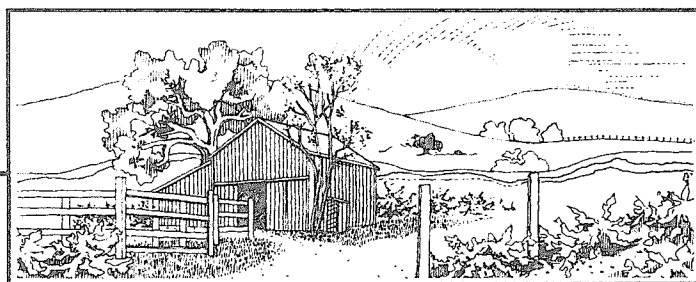
The comments within the notice mentioned that the notice from the Bureau indicated that there was concern that the area (285 sq. miles) may be too large and therefore inconsistent with the definition of a viticultural area.

In defense of the proposed area as it stands, I would like to say that as one of the parties involved in drawing up the proposed area, we looked very carefully at our geographical boundaries then proceeded to delineate what we feel is and will be with future viticultural development, an area with shared viticultural characteristics.

We are in total agreement with the Bureau's desire to delimit viticultural areas but I think one can go too far in exercising that concept. Attempts to reduce the size of our proposed area would not give any more credibility to the resultant area than what we have now. It would only prompt the establishment of adjacent viticultural areas which I think would create confusion to the consumer.

Our proposed area is not any larger than that of our neighboring area, the Santa Maria Valley which has been approved. Also, there is no mention of any concern of the Bureau of excessive size in the case of the proposed 26,000 sq. mile "Ohio River Valley" area with only 570 acres of vineyards. This is an area ten times as large as ours and only one third the vineyard acreage.

Alamo Pintado Vineyards and Winery, Inc.
1711 Alamo Pintado Road, Solvang, California 93463 (805) 688-8554



J. CAREY CELLARS

It is my feeling that this concern of excessive size of our proposed area is without any reasonable basis.

I hope my comments will be taken constructively by the Bureau staff and will be of value in their assessment of the proposed "Santa Ynez Valley" as a legitimate and meaningful viticultural area.

Cordially yours,

Richard R. Longoria
Richard R. Longoria
General Manager



Los Viñeros Winery

January 3, 1983

Notice #435

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

Dear Sir:

Regarding the Notice of Proposed Rulemaking (47FR53048; notice #435) concerning the Santa Ynez Valley, we observe concern expressed that the area may be too large, and/or inconsistent with the definition of a viticultural area.

We would comment that the Santa Ynez Valley is in fact a geographical entity, whose soil and climate are suitable for the growing of wine grapes. Inasmuch as tributary valleys enter into the main area, micro-climates are created which are individually well suited to viticulture. It was deemed prudent to include many of these areas in the application to avoid later annexation, inasmuch as the entire valley is basically one composite unit. It is entirely possible that additional grape acreage may be planted in the future, based principally upon economic considerations.

Having utilized grapes from various locations throughout the proposed area, and being familiar with the overall growing conditions there, in our opinion the proposal as submitted would be entirely suitable for favorable consideration.

Very truly yours,

Los Viñeros Winery, Inc.
E.N. Woods, President

ZACA MESA WINERY

P.O. Box 547
Los Olivos, CA 93441

January 4, 1983

Chief, Regulations and Procedures Division
Bureau of Alcohol, Tobacco and Firearms
Post Office Box 385
Washington, DC 20044-0385
Attention: (47 FR 53048; Notice No. 435)

Dear Sir:


The petition to consider the "Santa Ynez Valley" as a viticultural area was a collaboration between every winery and vineyard in the valley. The boundaries of the proposed area, as filed, were unanimously endorsed.

Zaca Mesa Winery has had 220 acres of producing vineyards since 1973, as long as anyone in the Santa Ynez Valley. We believe our climate, soil and varietal flavors are unique to this area.

Having participated in the committee to define the boundaries of the viticultural area, I know in fact that there are producing vineyards in the furthest extremities of the proposed area. Therefore, it would be inappropriate to reduce the size of the area.

The Santa Ynez Valley has been recognized in the October 1982 issue of California magazine by author Moira Johnston as a leading viticultural area, as attested to by our peers in the Napa Valley. I wish to reiterate Zaca Mesa's support for the boundaries of the Santa Ynez Valley viticultural area as filed.

Respectfully yours,


Robert Agnew
Vice President

Los Olivos, Calif. 93441
January 4, 1983

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

Attn: Notice No. 435

Dear Sir:

Notice No. 435 of the Federal Register announces the consideration of "Santa Ynez Valley" as a viticultural area and requests comments on ways in which the proposed area can be reduced in size.

I would like to submit that the petitioners have done a thorough job in outlining the area and that while the actual square miles may be more than some of the smaller viticultural areas the approval of this viticultural area would certainly be consistent with the definition of a viticultural area as a delimited grape growing region.

The Santa Ynez Valley happens to be rather large and encompasses a total area of nearly three times that which would be covered by the petition.

The petitions for "Ohio River Valley" (Notice No. 442) and "Yakima Valley" (Notice No. 436) where 26,000 square miles and 1,040 square miles respectively are under consideration would make the 285 square miles of "Santa Ynez Valley" small by comparison.

The notice refers to the fact that the Santa Ynez Valley has "only" 1,200 acres. That happens to be a ratio of 1 acre of grapes to every 152 acres of land. The approved "Carmel Valley" has only 120 acres of grapes with a ratio of 1:160; "Lancaster Valley" has a ratio of 1:5,422.

Size and number of acres should not be the guidelines. The question to answer is "Does the viticultural area inform the consumer?" In the case of the petition filed by the wineries and grape growers of the Santa Ynez Valley this question is answered affirmatively.

Fifteen years ago there were no wine grapes in the Santa Ynez Valley. After the remarkable success of grape growers and wineries of this area, the approval of their petition for a viticultural area is definitely consistent with the efforts of the ATF to inform the consumer.

Sincerely,

Diana Law
Diana Law
SYV Resident