

July 21, 1987

Chief, FAA, Wine and Beer Branch
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 385
Washington, D.C. 20044-0385

Reference: Notice No. 632 Sierra Foothills designation.

Our family has owned and operated a zinfandel wine grape vineyard in Calaveras County since May of 1900. We fully support the "Sierra Foothill" appellation proposal. Some of our vines approach 100 years in age and the grapes have been marketed without interruption since 1900. We would hope that in the future consideration will be granted to designating even more localized appellations within the Sierra Foothill area.

Sincerely

Alan L. Ghiardelli
5082 Pettinger Rd
Linden, CALIF 95236

3340
Fremont, Calif. 94536

Chief, FAA, Wine & Beer Branch
BATF - Ref. Notice 632
Po Box 385, Washington, DC 20044-0385

July 23, 1987
Fremont, CA.

RE: Sierra Foothills Viticultural Area - Notice #632

Dear Sir -

I am a consumer and amateur (home) winemaker who has followed the Sierra Foothills as a wine growing area since the middle 1960's. I have also made wines from Zinfandel grapes grown in Amador and Calaveras County, and - by way of contrast - from the Lodi area in the Central Valley.

A "Sierra Foothills" appellation is long overdue. As noted in the petition (Notice #632) this is an area with a distinct viticultural history, climate, geology and soils, which produces wines quite distinct from the Central Valley.

I also support the proposed boundaries, including ATF's northern extension to include the North Yuba area. I especially support the choice of the western county lines of El Dorado, ^{amador,} Calaveras, Tuolumne & Mariposa Counties as the

western boundary of the proposed viticultural area. The proposal establishes a common boundary between the El Dorado, Amador and Calaveras Counties portions of the Foothills, and the established "LODI" appellation to the west. It also includes, within the proposed Sierra Foothills appellation, the "Low Foothills" of western El Dorado, Amador & Calaveras counties. This is proper, in my view, because, ^{(in addition to common} predominant soil types in the Lower Foothills are the same as those in the Middle Foothills (see the USDA Soil Conservation Service Soil Surveys for El Dorado and Amador) whereas the Upper Foothills (which the Surveys term "Mountainous Uplands") have their own, ^{distinct} soil series.

I am emphasizing these points to counter any arguments you may receive which would seek to exclude the Lower Foothills by, for example, setting a 1,000' elevation lower limit. Higher elevation areas can always establish more limited appellations if they wish, such as El Dorado, Calif. Shenandoah Valley, & Fiddletown; The Sierra Foothills appellation should be more of an inclusive "umbrella", similar to Nor Coast or Central Coast. Thanks! Michael J. Matney

RADANOVICH VINEYARDS & WINERY

July 20, 1987

Chief, FAA, Wine & Beer Branch
BATF
Ref. Notice 632 P O Box 385
Washington, DC 20044-0385

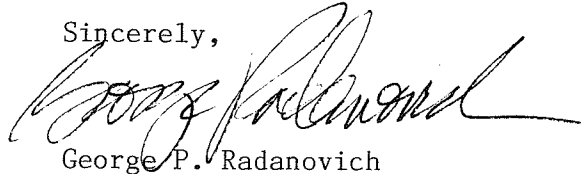
This letter is in regard to the Sierra Foothill Viticultural application currently under consideration. My purpose in this letter is to inform the Bureau of Alcohol and Firearms of the status of viticultural activities in Mariposa County and to support said County's inclusion in the Sierra Foothill appellation.

The planting of winegrapes in Mariposa County began in 1982. There are now approximately fifty acres of winegrapes under cultivation. Our winery obtained its bond in 1986 and is the first winery in Mariposa County. There is another application to your agency currently in process.

The area within Mariposa County, as described in this application, adequately identifies areas of current and future cultivation of winegrapes.

We are in support of this application and the inclusion of Mariposa County in the Sierra Foothill Viticultural area.

Sincerely,



George P. Radanovich
Principle

RENAISSANCE
VINEYARD & WINERY INCORPORATED

July 23, 1987

Chief, FAA, Wine and Beer Branch
Bureau of Alcohol, Tobacco & Firearms
Ref: Notice No. 632
P.O. Box 385
Washington, D.C. 20044-0385

Dear Sir:

This letter is in response to BATF Notice No. 632 which proposes the establishment of a 'Sierra Foothills' viticultural area in California. The application as originally submitted by the Sierra Foothills Winery Association seems to have merit; however, we oppose in the strongest terms BATF's arbitrary extension of the area to include land which is quite distinct from the area originally proposed.

This letter will point out the key differences; a physical inspection would settle the issue as the important distinctions are immediately apparent.

To support its proposal BATF presents a number of references to establish that the amended area is known as 'Sierra Foothills'. It is significant that none of the various State and quasi-governmental bodies quoted includes Yuba County in its grouping as 'Sierra Foothills'.

The proposal states that the California Department of Food and Agriculture places Yuba County in Grape District 9. The counties of Nevada, Placer, El Dorado, Amador, Calaveras, Tuolumne, and Mariposa are grouped as Grape District 10.

The proposal states that each year since 1978, the University of California Cooperative Extension Service and the farm advisors of Nevada, Placer, El Dorado, Amador and Calaveras counties have organized an annual 'Sierra Nevada Foothill' Wine Grape Day. It should be noted that although wine grapes have been produced each year since 1978 in Yuba County, it has never been included in 'Sierra Nevada Foothill' Wine Grape Day.

The proposal points out that in 1985 the California State Fair established a 'Sierra Foothills' region and included the counties of Nevada, Placer, El Dorado, Amador, Calaveras and Tuolumne; Yuba County was not included in this region.

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The proposal quotes from Leon Adams' book, The Wines of America to support the 'Sierra Foothills' name; it fails to point out that Yuba County is not included in Mr. Adams' section devoted to the 'Sierra Foothills' but rather is included in his description of the 'Sacramento Valley' viticultural region.

Finally, Wine Institute, the most widely respected trade group representing the wine industry, describes the 'Sierra Foothills' area as '...Made up of Amador, Calaveras, El Dorado, Modoc, Nevada and Tuolumne counties, the Sierra Foothills region has 2300 acres of grapes, with Zinfandel being the predominant variety. American viticultural areas within the region are El Dorado, Shenandoah Valley and Fiddletown.' It should be noted that little, if any, Zinfandel is grown in Yuba County and that it is not included in the counties comprising 'Sierra Foothills'.

In summary, each and every one of the sources presented in support of the name of the proposed viticultural area as 'Sierra Foothills' at the same time excludes Yuba County from the Sierra Foothills area.

As to geographical features, the current proposal states that 'the North Yuba viticultural area shares many of the characteristics of the petitioned area. Accordingly, BATF has drafted a boundary description which includes the North Yuba viticultural area.' This broad generalization is contradicted in several important points. On July 30, 1985 BATF established 'North Yuba' as an American viticultural area. In its final ruling it found 'North Yuba' to be '...not only distinguished historically from surrounding areas but geographically by its topography, elevation, geology, soils, temperature and rainfall.' It is described further as a 'middle foothill to lower mountain landscape' while the 'Sierra Foothills' petition describes the new proposed area as a 'gently rolling lower and middle foothill landscape'. The 'North Yuba' final rule states 'of the 18 soil associations found in Yuba County, basically three distinguish the soils of the viticultural area from the soils in surrounding areas of the County and the adjoining counties of Butte and Nevada in California'. The 'North Yuba' area includes mountain soil associations not found in other parts of the proposed 'Sierra Foothill' region.

The 'North Yuba' final rule also distinguishes the area from surrounding areas by its average annual rainfall of 40 inches. BATF's 'Sierra Foothills' proposal incorrectly puts this figure at 20 inches making Yuba County's rainfall similar to the other included counties instead of the actual figure which is twice as high.

The above provides a few of the many distinctions between the 'North Yuba' area and the proposed 'Sierra Foothills' area. It is clear that 'North Yuba' is not included when the public refers to the 'Sierra Foothills' wine area. BATF itself, in establishing 'North Yuba' as an American

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viticultural area, was careful to prove that 'North Yuba' is distinguished both historically and geographically from surrounding areas noting that it lies in the middle foothill to lower mountain area as distinct from the lower to middle foothill terrain of the other lands in the 'Sierra Foothill' petition, includes mountain soil associations and receives dramatically higher annual precipitation. It is understandable that it would be attractive to simplify distinctions between these areas and to combine any contiguous grape-growing lands into one catch-all viticultural area. However, such a generalization would only serve to diminish the value of the designation of specific areas and could only result in confusion for the consumer. We therefore respectfully request that BATF remove Yuba County from its 'Sierra Foothills' proposal in order to more accurately establish its boundaries.

Sincerely,



James R. Bryant
President

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