

*The  
University  
of  
Connecticut*

Sept. 20, 1983

STORRS, CONNECTICUT 06268

COLLEGE OF AGRICULTURE  
AND NATURAL RESOURCES  
*Department of Plant Science*

Chief, Regulations and Procedures  
Division  
Bureau of Alcohol, Tobacco and  
Firearms  
Attn: Mr. Charles N. Bacon  
Notice Number 477  
P.O. Box 385  
Washington, DC 20044-0385

Dear Mr. Bacon:

I wish to comment on the proposed boundaries for the Southeastern New England Viticultural Area as described in the Federal Register, Vol. 48, No. 151 dated August 4, 1983.

As a basic concept we agree on the idea of a viticultural area. However, the present boundaries are too restrictive. The entire coastal plain of Connecticut has the same grape growing climate as that presented for Rhode Island and Southeastern Massachusetts. Thus, the entire coastal plain of Connecticut should be included if such a district is established. Also, in the New England wine industry, Connecticut already has the majority of wineries and future development of the industry will have the greatest occurrence in Connecticut.

The potential economic disadvantage to Connecticut by a restricted viticultural region is unfair when one considers Connecticut's leadership in industry development. Also, the aspect of an unfair market advantage of Rhode Island and southeastern Massachusetts is a factor. Since the climate influencing grapes is the same in the excluded area there is no basis for not including it. Therefore, I request that the entire coastal plain of Connecticut be included in the proposed viticultural area.

I look forward to your reply.

Sincerely,



Everett R. Emino, Professor and Head  
Department of Plant Science  
ERE:el

**CROSSWOODS VINEYARDS**

**75 CHESTER MAIN ROAD, NORTH STONINGTON, CONNECTICUT 06359**

October 31, 1983

Chief, Regulations and Procedures Division  
Bureau of Alcohol, Tobacco and Firearms  
Attn: Mr. Charles N. Bacon  
Notice Number 477  
P.O. Box 385  
Washington, DC 20044-0385

Dear Mr. Bacon:

This is in reply to your request for information concerning the number of bonded wineries and the number of acres of grapes planted within the Southeastern New England Viticultural area boundary modifications we proposed in our correspondence of August 29, 1983.

There are 2 bonded wineries established at this time. Crosswoods Vineyards Winery will be ready for production in 1984. Construction began this month. The combined capacity of all 3 wineries will be 42,000 gallons.

The New England Wine Council survey of New England grape growers has not been completed. Unofficial results show 62 acres of grapes now under cultivation in New London County Connecticut. This figure is probably higher since not all growers surveyed responded.

Sixty-two acres of grapes will produce on the average 28,000 gallons of wine. This leaves a short fall of approximately 14,000 gallons or approximately 33 acres of grapes needed to meet our regional needs. Should additional wineries be established, and we expect them to be, additional land in the Connecticut's coastal region will come under grape cultivation simply to meet winery needs in New London County alone. For this reason we feel it especially important that the boundary modifications we propose be adopted.

I hope this information proves useful. If we can be of any further assistance please contact us.

Sincerely,



Susan H. Connell  
(Mrs. Hugh P. Connell)

**CROSSWOODS VINEYARDS**

**75 CHESTER MAIN ROAD, NORTH STONINGTON, CONNECTICUT 06359**

August 29, 1983

Chief, Regulations and Procedures Division  
Bureau of Alcohol, Tobacco and Firearms  
Attn: Mr. Charles N. Bacon  
Notice Number 477  
P.O. Box 385  
Washington, DC 20044-0385

Dear Mr. Bacon:

Reference is made to telephone conversation on August 23, 1983, concerning proposed boundries for the Southeastern New England Viticultural area currently under consideration by your office. This is an interum reply to inform you of our intent to propose a change to the eastern boundry as now described in Federal Register, Vol. 48, No. 151, dated August 4, 1983.

The boundry now proposed is restrictive to exsisting and planned Connecticut bonded wineries in the region. Additionally, established and potential grape growers along Connecticut's coastal plain may experience unfair market constraints in the out years if the proposed boundries are not modified. Growth in the number of bonded wineries and grape vineyards in southeastern Connecticut make us a major competitor in the New England wine and grape industry. The boundries now drawn give an unfair market advantage to southeastern Rhode Island and Massachusetts wineries at the expense of those in Connecticut.

We propose the Southeastern New England Viticultural area be extended west from the Mystic river to the Connecticut river excluding the New London urban area. Supporting arguments for this change, specific boundries and climatic and topographical data will be forwarded to you as soon as possible.

Thanking you for your consideration and prompt response to our inquiry,

Sincerely yours,



Susan H. Connell  
(Mrs. Hugh P. Connell)

**CROSSWOODS VINEYARDS**

**75 CHESTER MAIN ROAD, NORTH STONINGTON, CONNECTICUT 06359**

September 13, 1983

Chief, Regulations and Procedures Division  
Bureau of Alcohol, Tobacco and Firearms  
Attn: Mr. Charles N. Bacon  
Notice Number 477  
P.O. Box 385  
Washington, DC 20044-0385


Dear Mr. Bacon:

Reference our correspondence of August 29, 1983, in which I indicated we would propose a change to the Southeastern New England Viticultural area currently proposed.

Our arguments for limited modifications to the currently proposed boundary are attached. Should you have any questions or require additional information please contact me at telephone number 203-535-2205, or my vineyard manager at the same number.

We feel strongly about the matter, and we trust the information we have provided is sufficient for favorable consideration.

Sincerely,



Susan H. Connell  
(Mrs. Hugh P. Connell)

SHC:kpg  
Enclosures

## PURPOSE:

This study provides climatic and topographical data in support of our request that modifications to the Southeastern New England Viticultural Area petition as now outlined in Federal Register/ Vol. 48, No. 151/ Thursday, August 4, 1983/ Proposed Rules, include a greater portion of Connecticut within the proposed boundaries.

## BACKGROUND:

The boundry now proposed is restrictive to exsisting and planned Connecticut bonded wineries in the region. Additionally, established and potential grape growers along Connecticut's coastal plain may experience unfair market constraints if the proposed boundaries are not modified. Growth in the number of bonded wineries and grape vineyards in southeastern Connecticut make them a major competitor in the New England wine and grape industry. The boundaries now drawn give an unfair market advantage to southeastern Rhode Island and Massachusetts wineries at the expense of those in Connecticut.

"Urbanization", "higher elevations", and "hillier terrain" in Connecticut do not differ substantially from other areas in the proposed region. Proposed boundary changes are shown on the map at TAB A.

## DISCUSSION:

Connecticut's Coastal Plain extends about 10 miles inland from Long Island Sound. The climate of this area is more greatly affected by this body of water than is the remainder of the state, making the climate of the Coastal Plain different from other parts of the state but homogeneous with the coastal regions of Long Island and Massachusetts (TAB B).

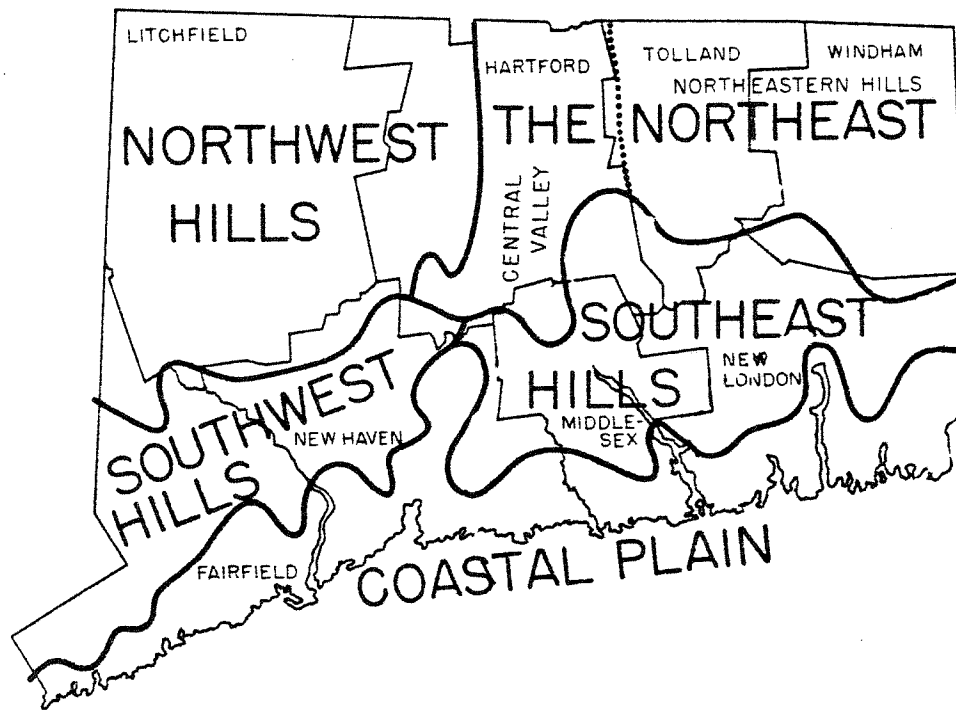
The growing season in the area we propose to add is 180 days or longer and extends from New London County to Fairfield County adjacent to the New York state boundary (TAB C). The mean annual temperature is 50°F (TAB D). Data for the average first frost (32°F) in fall and average last frost (32°F) is at TABS E and F. A more comprehensive study of Connecticut's climate is attached at TAB G. Weather station data which we believe pertinent to the area is underlined in red. Additional rainfall and snowfall information is at TAB H and I.

Topographical data is shown by the map at TAB J. There is a clear dichotomy between the more "hilly" inland areas and the coastal region. The changes in boundaries we propose include terrain similar to that of other areas in the petition.

CONCLUSION:

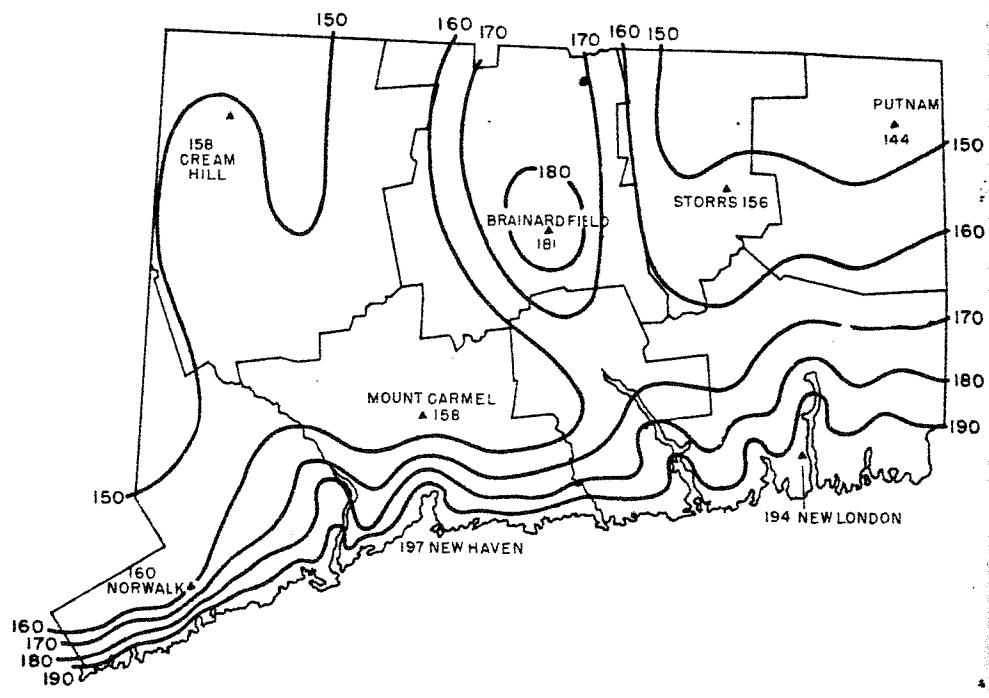
A review of the climatic and topographic data provided supports our argument that the proposed boundaries of the Southeastern New England Viticultural area should be modified. An overlay to delineate the area we request be included in the proposed boundaries (USGS map scale 1:250,000) is at TAB K.

A revision to the Federal Register wording (paragraph 9.72) as well as proposed changes to the remainder of the proposed rules is at TAB L.



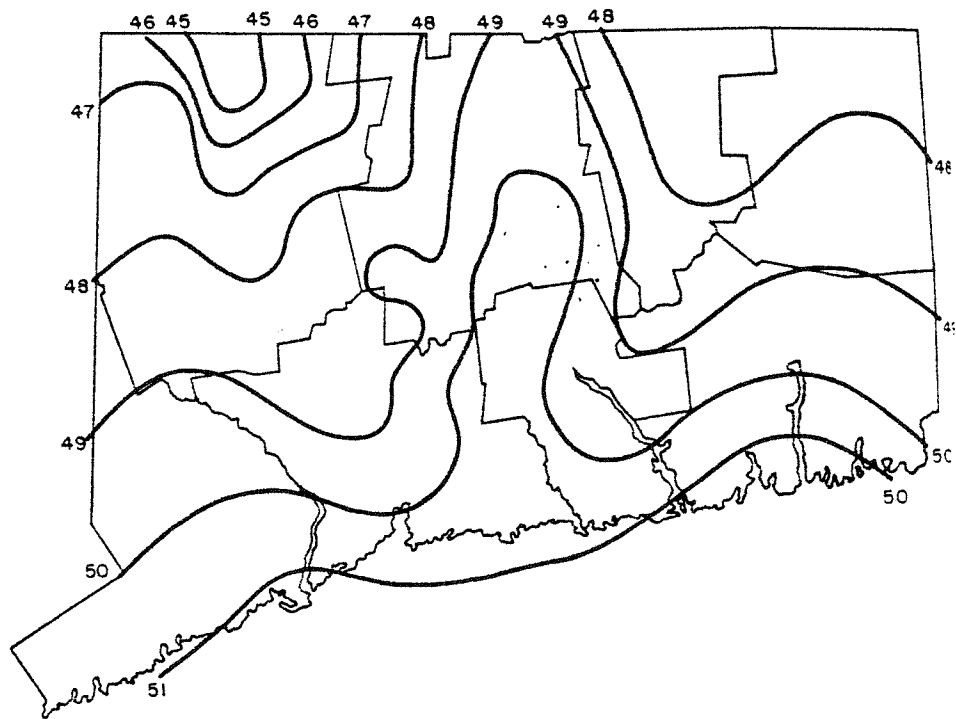
Connecticut climate regimes

Source: Brumbach, The Climate of Connecticut



Average lengths of freeze-free season (days)

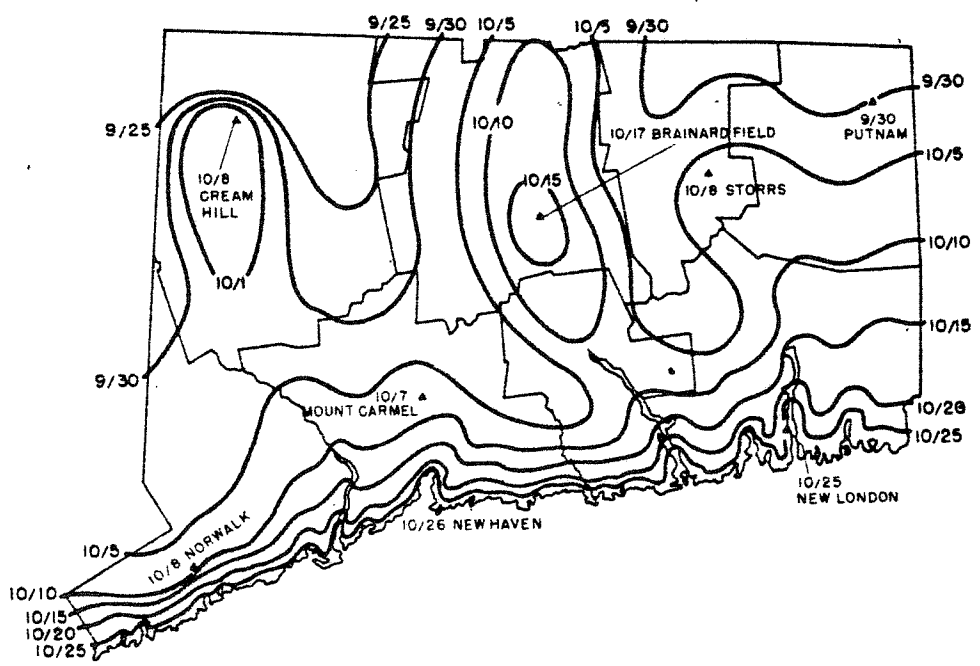




Annual mean temperatures in degrees Fahrenheit

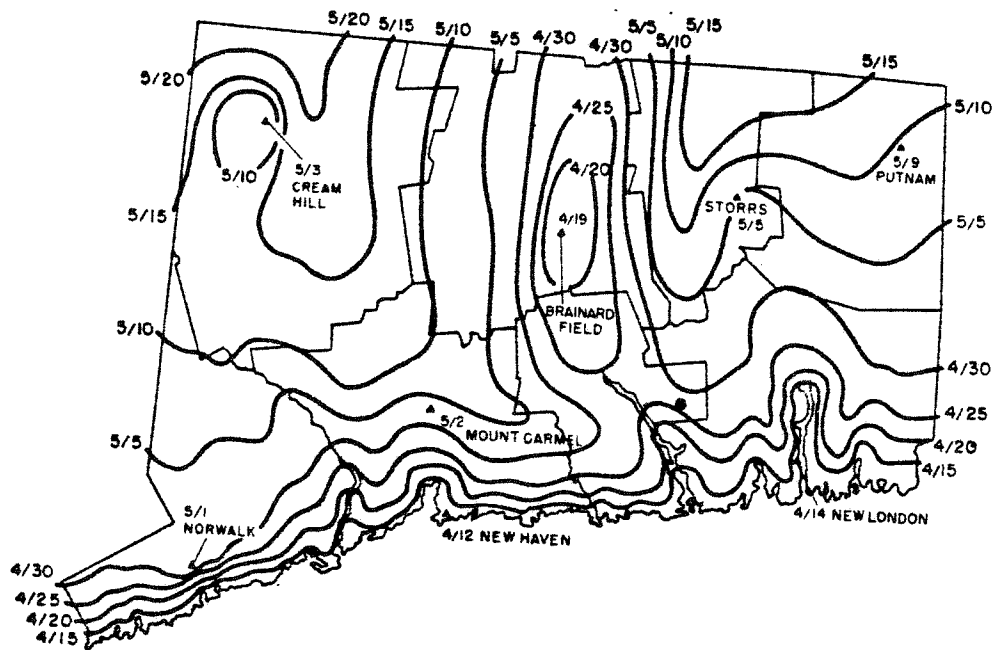
Source: Brumbach, The Climate of Connecticut

Average dates of first 32°F in fall in Connecticut



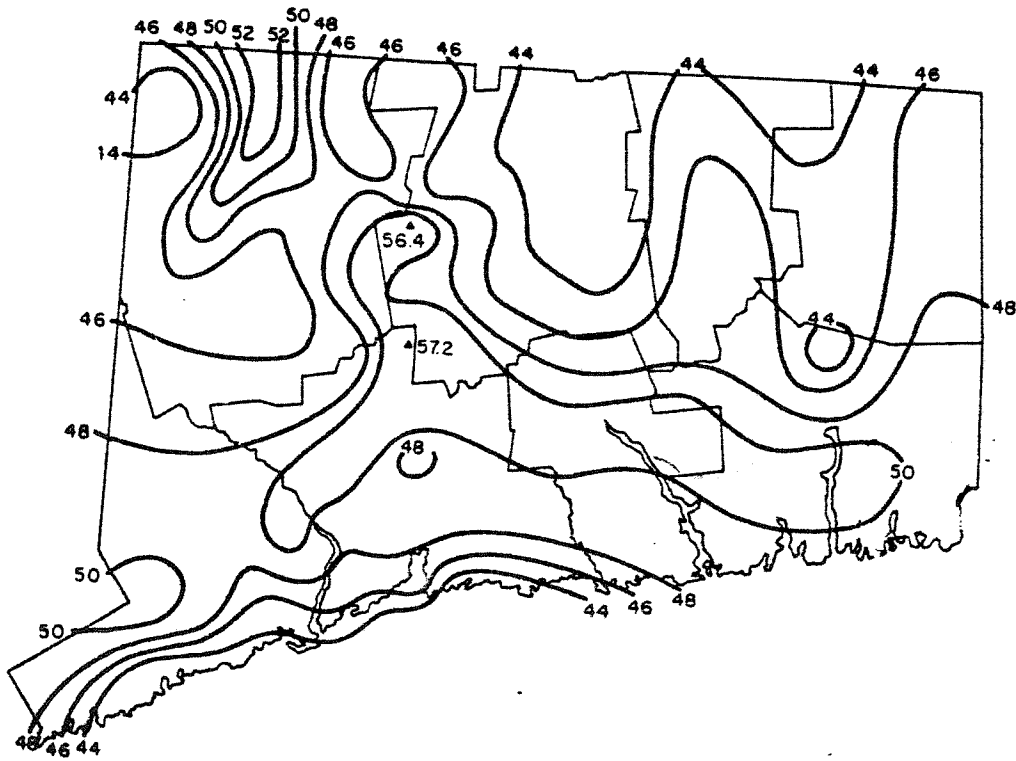
Source: Brumbach, The Climate of Ct., 1965

Average dates of last 32°F in spring in Connecticut



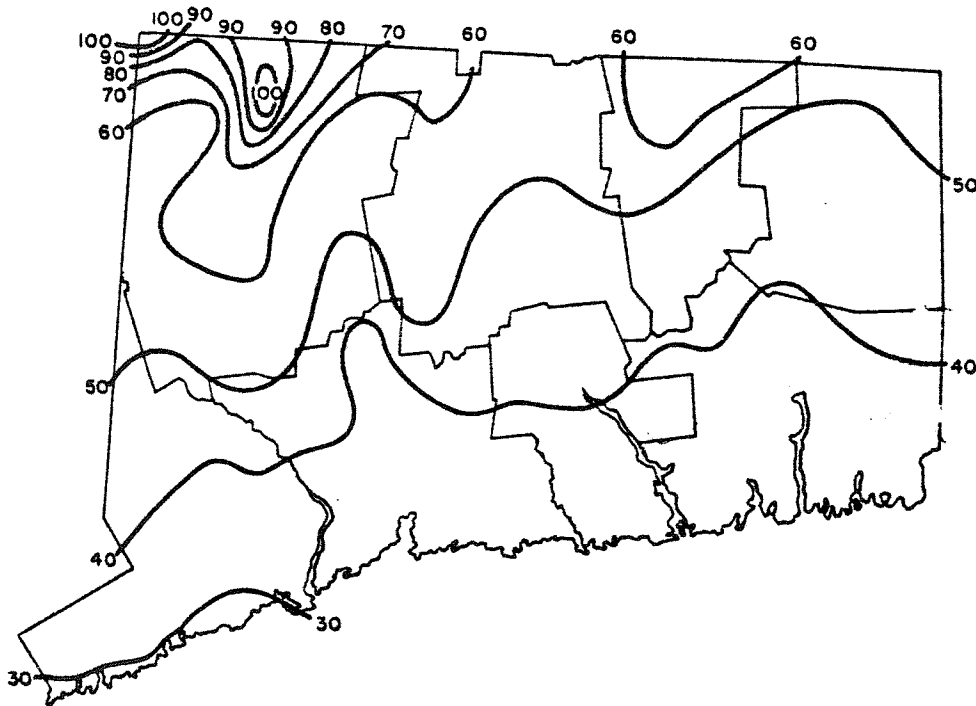
Source: Brumbach, The Climate of Connecticut

Connecticut mean annual precipitation in inches.



Source: Brumbach, The Climate of Ct. 1965

Connecticut mean seasonal snowfall in inches 1941 - 1942 to 1960 - 1961.



Source: Brumbach, The Climate of Connecticut