

**Sutton, Nancy A.**

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**From:** Allen, Ellen L.  
**Sent:** Thursday, October 09, 2003 6:36 AM  
**To:** Sutton, Nancy A.  
**Subject:** FW: 27 CFR Part 9 (notice No. 17)

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

From: Renquist, Steve [mailto:steve.renquist@oregonstate.edu]  
 Sent: Monday, October 06, 2003 8:03 PM  
 To: nprm@ttb.gov  
 Subject: 27 CFR Part 9 (notice No. 17)

Proposed Southern Oregon Viticultural Area (2002R-338P).  
 Dear Sirs,

I am the Oregon State University Extension Horticulturalist for Douglas and Josephine Counties in Southern Oregon. The Umpqua Valley AVA and most of the Rogue Valley AVA fall within these two counties. I work with both vineyards and wineries in these two regions as well as fruit and vegetable producers.

I strongly support this application for a Southern Oregon AVA because of the unique climatic features of the proposed region and because this AVA will allow marketers and consumers to better differentiate the two major grape growing regions of Oregon.

I would like to reinforce two main points that were accurately stated in the original application for the Southern Oregon AVA classification. This region of the state of Oregon that lies between the Coastal Mountain range to the west, the Cascade Mountain range to the east, the Calapooya Mountains to the north and the California border to the south has a very different climate than other regions of the state. In simplistic terms this region has mild, wet winters with 30-35 inches of rain on average and very warm dry summers. This area has significantly more growing degree days than the Willamette Valley to the north, (about 500gdds/year), that allow grape growers to ripen a wider variety of wine grapes. This proposed Southern Oregon AVA can consistently ripen warm climate varieties like Syrah, Cabernet S., Merlot, Tempranillo, and Grenache and at the same time this region can grow high quality cool season grapes like Pinot Gris, Pinot Noir and Riesling.

The second major point I would like to reinforce from the original application is that the designation of Southern Oregon will allow consumers from other areas of the United States to better understand where the wines with this label are coming from. And that the wines from Southern Oregon are going to be different than wines from the cooler north. Small AVA's like the Rogue Valley, Umpqua Valley and Applegate Valley do not often help casual wine consumers to focus where in Oregon these wines are coming from. To date more effective marketing has been done by cool region grape growers and wine producers in the Willamette Valley. This makes most wine customers think that Oregon produces mostly cool climate varieties. Creating a Southern Oregon AVA will allow wine producers from many small areas to work together to educate consumers on the unique qualities of our climate and topography that influence the grapes and wines of this region. Creating a Southern Oregon AVA will be a major step in differentiating the two primary grape growing regions of Oregon for American Consumers.

Steve Renquist  
 Extension Horticulture  
 Douglas County Extension Horticulture  
 PO Box 1165  
 1134 SE Douglas Ave  
 Roseburg, OR 97470  
 Phone: 541-672-4461  
 Fax: 541-672-4453

**Sutton, Nancy A.**

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**From:** Allen, Ellen L.  
**Sent:** Thursday, October 09, 2003 6:35 AM  
**To:** Sutton, Nancy A.  
**Subject:** FW: Notice No. 17--RIN: 1513-AA75; 2002R-338P: Southern Oregon AVA

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

From: Conde Cox [mailto: ]  
Sent: Wednesday, October 08, 2003 1:52 PM  
To: nprm@ttb.gov  
Cc: Earl Jones  
Subject: Notice No. 17--RIN: 1513-AA75; 2002R-338P: Southern Oregon AVA

To the TTB:

Please accept this comment in support of the proposed new Southern Oregon AVA for wine labels.

Professionally, I write about Oregon wine for various magazines, including Wine Press Northwest and Northwest Palate. I have previously written about wine for a newspaper, and I am currently an applicant for admission to the London-based Institute for Masters of Wine. Wine, and Oregon wine in particular, are my passion and the subject of my work.

It is my firm conviction that a separate label name for Southern Oregon wine is fully justified and that the area grows distinctive wine grapes that produce unique, identifiable wines. Wines made from grapes grown in the Umpqua and Rogue River Valleys (which are proposed to be virtually merged, for purposes of this new label name) exhibit similar characteristics, and this is not surprising, given the nearly indistinguishable weather patterns that are found in these two areas. In fact, Southern Oregon constitutes an appropriate and even necessary addition to America's list of identifiable viticultural areas, because wines from Southern Oregon are made from grape varieties that can not be suitably grown in any other part of the State, with the possible exceptions of that tiny part of the Walla Walla AVA that stretches barely into Oregon, or that parts of the Columbia Valley appellation that touches Oregon; but even wines made in Oregon's small part of the Walla Walla or Columbia AVAs are noticeably more herbal and exhibit far less black cherry notes on the nose and palate than wines made from the same grape varieties grown in Southern Oregon; in other words, Southern Oregon wines "in the glass" show their terroir-source, even in comparison to wines made in other parts of the Pacific Northwest from the same grape varieties. One reason for this taste-flavor distinction must be the cooler nights at slightly higher elevation for Southern Oregon, as compared to Eastern Washington or the parts of northeastern Oregon that are also situated in or near the Columbia Valley..

To me, and, I would dare-say, to others who live in the southwestern part of Oregon, the term "Southern Oregon" is used to define a distinctive region that is bounded: (i) on the east by the Cascade Range; (ii) on the west by the Coastal Range (which is west of the Klamath and Siskiyou Ranges); (iii) on the north by ridge lines located barely south of Lane County, just to the southwest of Cottage Grove [near Drain and Curtin] that tend to deflect clouds and rainfall toward Eugene, where rainfall and cloud cover are substantially higher than in Roseburg and points south; and (iv) on the southern end, by the Cascade-Siskiyou connecting ridge line, which, to me, is perfectly defined by the Pacific Crest National Scenic Trail, which runs in this region on an east-west axis, just barely north of the

Oregon-California state line.

It is important to realize for purposes of Oregon grape growing, that Vinifera grapes can not be grown east of the Cascades because of severe cold (brought on in part by high elevation). In addition, fine wine grapes grown in the cool wet region to the north (ie, in the Willamette Valley) will nearly always be of the pinot family (pinot noir, pinot gris, and pinot blanc, all of which are genetic cousins), which have, not surprisingly historically been grown in the cool (but not cold) damp regions of Europe, such as Burgundy and Alsace. Southern Oregon's finest wines are made from Syrah, Malbec, Cabernet Franc, or Tempranillo, which are varieties that have historically been grown in the warmer parts of Europe, such as the French Rhone Valley or Spanish Ribera del Duero. To the far west, in the Oregon Coastal zone, quality wine grape growing would certainly encounter mildew and Pierce's Disease problems that would force growing techniques and varietal selection that would likely result in certainly very different if not even low quality wines, (which of course is the reason that there are no extant Oregon Coastal Zone wineries or vineyards, to my knowledge).

I use the term "Southern Oregon" in my professional writing to describe this region, and the use of this phrase in print, in my view, does not cause confusion, for the reason that people living in this area fully understand what the general boundaries are when this term is used, both in general terms and in the particular sense of distinctive wine making and grape growing.

Please approve this new AVA. It is long overdue.

Condé Thompson Cox

Ph. [REDACTED]

US Mail: [REDACTED]

email: [REDACTED]

Deliveries: [REDACTED]

**Sutton, Nancy A.**

**From:** Mark [REDACTED]  
**Sent:** Monday, November 03, 2003 3:03 PM  
**To:** Rulemaking, TTB  
**Subject:** Notice No. 17--RIN: 1513-AA75; 2002R-338P: Southern Oregon  
To the TTB:

I am writing in full support to the proposed Southern Oregon AVA. As the president of the oldest winery in the Rogue Valley, it is clear from over thirty years of winegrowing that the Rogue, Applegate and Umpqua AVA's can and should be combined into a Southern Oregon AVA.

The grapegrowing conditions in the Umpqua Valley are very similar to those in parts of the Applegate Valley and, historically, all of the regions share much in common.

Sincerely,

Mark Wisnovsky  
President  
Valley View Winery, Inc.  
Jacksonville, Oregon 97530  
[REDACTED]

11/13/2003

Notice 11/13/03

**Sutton, Nancy A.**

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**From:** jdwb [REDACTED]  
**Sent:** Monday, November 03, 2003 9:55 AM  
**To:** Rulemaking, TTB  
**Subject:** Comments RE: TTB Notice No. 17 Souther Oregon AVA

name=John Weisinger name=Weisinger's of Ashland - Winery Address1=3150  
Siskiyou Blvd. Address2= City=Ashland State=OR Zip Code=97520  
Comments=RE:TTB Notice No. 17; (2002-338P) I hardily support the designation  
of the Southern Oregon AVA. I have lived in Southern Oregon for 32 years and  
have been involved in the wine industry for 24 years growing grapes, serving  
on the Oregon Wine Growers Association Board and serving on the Oregon Wine  
Advisory Borad for the State's wine industry. The creation of the Southern  
Oregon Viticultural area only makes sense as expressed by other commenters.  
The Southern Oregon region is known nationally and globally for its quality  
agricultural products. Bring wine under this umbrella will be a boost to the  
industry in its marketing, its location and identification by consumers and  
will continue to build a solidarity between the present Umpqua and Rogue  
Valley AVAs which was begun three years ago in the establishment of the  
Southern Oregon Winery Association. I see no down side to the establishment  
of the Southern Oregon Viticultural Area. John Weisinger  
John Weisinger  
Weisinger's of Ashland  
www.weisingers.com <<http://www.weisingers.com>> (website)  
wine@weisingers.com <<mailto:wine@weisingers.com>> (contact us)

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Outgoing mail is certified Virus Free.  
Checked by AVG anti-virus system (<http://www.grisoft.com>).  
Version: 6.0.532 / Virus Database: 326 - Release Date: 10/27/2003

I'm fully in favor of the "Southern Oregon viticultural area".  
Anything to  
assist in keeping a Jug of Henry's red alongside the hot springs....

Jon. Anderson

  
Olympia, WA 98502

**Sutton, Nancy A.**

**From:** Tim Woodhead [bv@bridgeviewwine.com]  
**Sent:** Tuesday, November 04, 2003 4:37 PM  
**To:** Rulemaking, TTB  
**Subject:** Notice No. 17-RIN: 1513-AA75; 2002R-338P: Southern Oregon

Dear Sirs,

Bridgeview Vineyards & Winery is very much in favor of the proposed new A.V.A. of "Southern Oregon".

Bridgeview tried in the late 80's to get our A.V.A. named "Southern Oregon", but at that time, we were outvoted and the name became "Rogue Valley".

We've found that many consumers outside of the Pacific Northwest don't have the slightest idea where the Rogue Valley is, but they do know that Southern Oregon is a couple hundred miles south of the Willamette Valley.

We feel that the A.V.A. "Southern Oregon" would be more recognizable to consumers and on wine lists outside of the Pacific Northwest, as opposed to the currently existing A.V.A.s of Rogue Valley, Umpqua Valley, or Applegate Valley.

Southern Oregon would be a more useful sales tool. For this reason we are definitely in favor of the proposal.

Robert Kerivan  
Owner  
Bridgeview Vineyards

11/13/2003

NOTHING, #6

**Sutton, Nancy A.**

**From:** Cole Danehower [REDACTED]  
**Sent:** Tuesday, November 04, 2003 11:38 AM  
**To:** Rulemaking, TTB  
**Cc:** Cole Danehower  
**Subject:** Proposed Southern Oregon AVA (2002R-  
In regards to: Alcohol and Tobacco Tax and Trade Bureau

27 CFR Part 9

[Notice No. 17]

RIN: 1513-AA75

I am writing to enthusiastically support the establishment of a Southern Oregon AVA. I believe the approval of this AVA is of great importance, both to give consumers a better tool for distinguishing between the major types of wine produced in Oregon, and to reflect the geographic and climatic reality of Southern Oregon.

Since 1999 I have been deeply involved in the Oregon wine industry as the publisher and editor of the Oregon Wine Report, a respected consumer-focused magazine-style quarterly newsletter. I am also a Contributing Editor and the Northwest Wine columnist for Northwest Palate magazine, and have published articles about Oregon wine in The Oregonian, The Eugene Register-Guard, and The World, in Coos Bay. I have also recently served as a board member of the Oregon Wine Advisory Board, and chaired the marketing committee.

From my knowledge and experience of Oregon wine, I heartily concur with the proposed Southern Oregon AVA as outlined in the proposal, and urge the TTB to grant full approval to this much-needed designation.

My reasons for supporting this petition are as follows:

A) I firmly believe that the establishment of a Southern Oregon AVA will bring a new level of clarity to the consumers of Oregon wine, and give them a greater understanding of the viticultural diversity of the State of Oregon.

11/13/2003

NOTED BY TTB



a. The designation of a Southern Oregon AVA will dramatically help consumers more accurately characterize the source of grapes in bottles of Oregon wines. Consumers today tend to view Oregon as a monolithic grape growing entity. Despite the fact that Oregon's modern wine industry began in Southern Oregon, the overwhelming market success of cool climate grape growing in Northern Oregon (specifically the Willamette Valley AVA) has meant that consumers are confused when faced with an Oregon wine made from warm-climate grapes. Consequently, grape varieties that thrive in the warm-climate regions of Southern Oregon see resistance from a market that does not understand Oregon possesses two distinct growing regions. The designation of a Southern Oregon AVA will clear up this confusion by giving consumers an easy and useful way of distinguishing between the two major wine growing regions in Oregon. By aggregating the existing warm-climate AVAs (Rogue, Umpqua, and Applegate Valleys), into a more understandable and accurate Uber-AVA, consumers will be better able to knowledgeably choose the varietal and style of wine from Oregon that matches their preference.

B) The establishment of a Southern Oregon AVA will make official the de facto reality of nature: Southern Oregon is a unique winegrowing region distinct from any other winegrowing region in the state.

a. As is amply described in the petition, the geologic and climatic circumstances of Southern Oregon differentiate the region from all other parts of Oregon. This fact has resulted in a vibrant wine-growing industry that relies on warm-climate wine varieties that cannot be successfully grown in the northern parts of Oregon, including the Willamette Valley AVA. Nearly all of the most widely planted warm-climate grape varieties in Oregon (Syrah, Cabernet sauvignon, Merlot, Tempranillo, Cabernet franc, Petit verdot, Malbec, Viognier), are exclusively grown commercially within the boundaries of the proposed Southern Oregon AVA. The approval of a Southern Oregon AVA will be a legal recognition of this distinctive viticultural reality, and will enable wineries within the AVA to more explicitly label the source of their wines.

C) The establishment of a Southern Oregon AVA will also recognize the de facto reality of the marketplace: that the term "Southern Oregon" is widely and commonly used to describe Oregon's warm-climate growing regions.

a. The designation "Southern Oregon" is not only a long-established geographic reference to the region outlined in the proposal, it is also a commonly used descriptor within the local and national wine community. The term "Southern Oregon" is widely understood to mean warm-climate wines produced in the area south of Eugene and including the Rogue, Umpqua, and Applegate Valley AVAs. Reflecting this, "Southern Oregon" has repeatedly appeared on wine labels since the early 1970s, including those from: Valley View, Hillcrest, Girardet, and Abacela. Also, wine writers and authorities have commonly employed the term "Southern Oregon" to describe the region outlined in the petition including the following sample references:

- i. Northwest Wine Guide, Andy Perdue, Sasquatch Books, 2003, p. 93
- ii. The Gourmet's Guide to Northwest Wines & Wineries, Chuck Hill, Speed Graphics, 1998, p. 197, et.al.

- iii. Oregon Wine Report #6, Cole Danehower, 2001, p. 3 et. al.
- iv. Northwest Wine Press, Vol. 5, #2, Summer 2002, Cover Story

The Southern Oregon AVA is a much needed recognition of both the geographic and commercial characteristics that are inherent in the region defined in the petition, and which uniquely distinguish the region from other grape-growing locales in Oregon. I heartily support the creation of this AVA.

Sincerely,

**Cole Danehower**, Publisher & Editor

**OREGON WINE REPORT**

*Contributing Editor, Northwest Palate*

[REDACTED]

Scottsburg, OR 97473

[REDACTED]

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

From: Barrie Layne

Sent: Wednesday, November 05, 2003 1:27 PM

To: nprm@ttb.gov

Subject: 27 CFR Part 9 [Notice No. 17] RIN: 1513-AA75

Re: Proposed Southern Oregon Viticultural Area (2002R-338P)

To Whom It May Concern:

We have a 30-year involvement in the Oregon wine business having established a 35-acre vineyard in Southern Oregon's Applegate Valley beginning in 1973. We primarily grow Cabernet Sauvignon, Merlot, and Chardonnay varieties.

✓ We strongly support the proposed Southern Oregon AVA.

As the Oregon wine industry developed, the state has become known primarily for the wines grown in the more populous northern half (Eugene northward to Portland). The wine region generally known as Southern Oregon has its own distinct climatic and geographical features that allow production of wines that are significantly different from Willamette Valley AVA wines. This topic is very well covered by Steve Renquist's letter (Comment #1).

We need the Southern Oregon AVA to complement our national marketing efforts. People outside of the Pacific Northwest do not know or perhaps even care about small AVA's such as Rogue, Applegate, or Umpqua, but all can understand Southern Oregon. The proposed AVA is more appropriately sized to compete in the market with other AVA's, which will strengthen economic development in the region.

The boundaries of the proposed AVA agree with our accepted definition of the wine-growing region, and are appropriate for the climatic and geographical features that are unique to the region.

The State of Oregon and wine consumers all over the US will benefit from this new AVA.

Roger and Barrie Layne  
Layne Vineyard  
Grants Pass, OR 97527

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

**From:** wine

**Sent:** Thursday, November 06, 2003 7:59 PM

**To:** nprm@ttb.gov

**Subject:** Notice No. 17: Southern Oregon AVA: 2002R-338P

To the TTB,

The intent of this comment is to support the proposed Southern Oregon AVA (2002R-338P)

I am a winemaker and part owner of a winery in southern Oregon. I am also the current President of the Southern Oregon Winery Association, an association of 22 bonded wineries located in the Rogue, Applegate, Illinois and Umpqua valleys. The association, formed in January of 2001, was created as a means of collectively marketing the wines from Southern Oregon.

As the wine industry in both northern and southern Oregon grows it is becoming increasingly important to better define, for the consumer, the different and unique wine producing areas of our state. Currently, most wine consumers assume that Oregon is a cool climate state producing cool climate varieties such as Pinot Noir, Chardonnay, Riesling and Pinot Blanc. This false perception creates a disadvantage for many wineries in southern Oregon who, due to the naturally warmer and much drier climate, produce varieties such as Merlot, Cabernet Franc, Syrah, Tempranillo and Cabernet Sauvignon, to name just a few. A Southern Oregon AVA would serve to better inform the consumer as to the origin of these wines.

Currently, there are smaller AVA's such as the Rogue, Applegate and Umpqua. All of these areas are similar not only in that they share geographic and climatic characteristics, but also in that they are so vastly different from the rest of Oregon. And though these smaller AVA's are important in their own right, it is difficult not to be aware that these AVA names often mean little to consumers outside our area. A Southern Oregon AVA, however, would be both immediately recognized by the consumer and define, collectively, the uniqueness of our entire southern Oregon region.

As stated in the original proposal, southern Oregon is geographically and climatically different from the rest of Oregon. As a result, the wines produced from southern Oregon are by their nature and character different from those produced in the rest of Oregon. The establishment of a Southern Oregon AVA will help to define, and brand, this unique wine growing area of Oregon with a greater degree of integrity than has ever been done before.

On behalf of the Southern Oregon Winery Association, we ask that you approve this new AVA.

Sincerely,

Eric J. Weisinger  
President, Southern Oregon Winery Association  
Jacksonville, OR 97530

Notice # 17  
Comment # 10

Comment 10

November 11, 2003

Chief  
Regulations and Procedures Division, Alcohol and Tobacco Tax and Trade  
Bureau  
P.O. Box 50221  
Washington, DC 20091-0221

Attn: Notice No.17, support of the proposed Southern Oregon Viticulture Area  
(2002R-338P).

Southern Oregon has seen growth among warm and cool climate winegrape varieties since 1980. Prior to that time, Oregon was known for Pinot noir and other cooler climate varieties such as Chardonnay and Pinot gris. There has been growing recognition for the three appellations in Southern Oregon, namely Umpqua, Rogue and Applegate Valley. The warm climate varieties of note are Syrah, Cabernet Sauvignon, Merlot, Cabernet franc, Grenache, Tempranillo, Malbec, Dolcetto, Viognier, Sauvignon blanc, Sangiovese, and Graciano. These varieties originate in Bordeaux and Rhone Valleys of France, Rioja region of Spain, Piedmonte and Chianti regions of Italy, which are considered warmer climates than the Champagne, Chablis, Burgundy, Rhine, and Loire regions of France and Germany for which the Willamette Valley is known.

There are a large number of macroclimates created by the Klamath Mountains in Southern Oregon with deep valleys with warm climates and with cooler climates in higher elevations or rainfall. Secondly, there are hotter daytime temps because of the insulation from the ocean influence combined with cool nights because of either higher altitude or deep valleys that collect cool night air. Therefore, winegrapes grown in the region produce wine flavors and color intensity often greater than in their countries of origin or in California. Good weather at bloom and long warm dry fall ripening weather have given the region ideal conditions for the production of high quality wines.

**Climate:**

The western area of Umpqua Valley, Illinois Valley and the upper elevations of Rogue Valley (alt. 2000-2300 feet) range from 2400 to 2700 Degree Days which is similar to a warm Sonoma Valley area in California. The lower elevations of Southern Oregon (alt. 500-2000 feet) range from 2700 to 3000 Degree Days which is similar to Napa Valley. Also, the Applegate and Illinois Valleys have shorter season (140-160 days) requiring frost protection in spring and fall, but the rest of Rogue Valley from Grant Pass to Bear Creek Valley and Umpqua Valley have a longer season of 180 to 200 days which favors winegrape varieties requiring longer growing season.

**Soils:**

Soils in Umpqua Valley are characterized as deep loam to clay soils producing considerable vine growth. Most soils in the Rogue Valley including Illinois Valley are shallow sandy loams to heavy clays with less vine growth in contrast to the deeper soils. Granite soils at the foot of the Siskyou Mountains are considered the easiest to managed while the heavy clay soils along the eastern slopes of Bear Creek and the serpentine soils in western valleys of the Rogue and Umpqua Valleys are greater challenges to manage.

**Water availability:**

Rainfall which occurs mainly during the winter months varies from 50 inches in the western areas to 35 inches in the easterly areas such as Grants Pass, Applegate Valley, and Umpqua Valley, to 18 inches in Bear Creek Valley of Rogue Valley. There are several irrigation districts in Southern Oregon who can supply supplemental water from snow melt for frost protection and irrigation during the dry growing season.

**Winegrape maturity:**

Wine makers recognize that grape maturity should coincide with the end of the area's growing season to produce the highest color, complexity and intensity of wine flavor. This region has a range of growing seasons, which match the maturity requirements for adapted varieties.

**Training methods:**

The region is known for the development of a training system that has been an important advance into controlling vine vigor and increasing light exposure on the heavy and fertile soils in Southern Oregon. This training system is called Scott Henry of Southern Oregon who developed it and it now has wide acceptance in the region. This system nearly doubles the grape yields and increases wine color and flavors.

I believe that Southern Oregon should be designated as an appellation because of similarity of versatile macroclimates and soils, which are able to mature cool and warm climate winegrape varieties for distinctive varietal wines. The region contains two distinct valleys connected by the Klamath Mountains. This mountain range contains peaks that have lower altitudes than surrounding peaks of the Cascade and Coastal range. The region's climes and soils are influenced by the Klamath Mountains. I hope you will designate this region as Southern Oregon Appellation.

Porter Lombard, Professor Emeritus of Horticulture, Oregon State University  
Medford, Oregon 97504

Background: Educator, Researcher, and Consultant In Viticulture for 35 years in Oregon and internationally recognized particularly in Europe, South Africa, New Zealand, and Australia.

Greetings,

As a grower of wine grapes in the Umpqua Valley, I strongly support establishment of a Southern Oregon AVA. The proposed area, which includes the existing Rogue Valley, Applegate Valley and Umpqua Valley AVAs is sufficiently different from other wine producing regions in Oregon to warrant separate designation, but sufficiently consistent to be grouped together. Unlike the Willamette Valley, in which over 80% of the grape growing acreage is planted to Pinot Noir and Pinot Gris, the proposed Southern Oregon AVA counties (Douglas, Jackson and Josephine) grow a wider range of grape varieties with less concentration of any single variety. The two most widely planted varieties in Southern Oregon, Merlot and Pinot Noir, account for just over 38% of the planted acreage in the area. (Acreage information taken from the 2002 Oregon Vineyard and Winery Report, prepared by the Oregon Agricultural Statistics Service and available at [http://www.oregon.gov/ODA/STATISTICS/Pages/2002-Vineyard-and-Winery-Report.aspx](#)). Grapes from the three Southern Oregon AVAs are often combined to produce Southern Oregon wines, another factor that supports identification of a single AVA.

As is pointed out in the application, Southern Oregon counties share more climatologically while they differ from the wetter and colder Willamette Valley and the drier and hotter Columbia Valley AVAs. They are thus more likely to produce wines of a consistent quality and style. Overall, designating a Southern Oregon AVA will provide meaningful information to inform consumers in their wine purchase decisions.

Phillip Muller  
Felicity Growers, LLC  
Myrtle Creek, OR 97457



Notice #17

Comment 12

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

**From:** LaGarzaCellars

**Sent:** Tuesday, November 11, 2003 6:05 PM

**To:** nprm@ttb.gov

**Subject:** 27 CFR Part 9 (notice No. 17)

Proposed Southern Oregon Viticultural Area (2002R-338P)

COMMENT:

To the T.T.B. and to whom it may concern:

I am writing to show my full support for the proposed Southern Oregon AVA. I have been working in the Oregon Wine Industry since 1976 and feel the passing of this proposal a positive step in letting the public know more about where the wine they are consuming originates as well as better differentiating the two major grape growing regions of Oregon.

While marketing southern Oregon wine in other parts of the country over the last 10 years, I have found that many people do not have any idea where the Umpqua Valley is located. Some do not even realize it is in Oregon. By allowing a Southern Oregon appellation on our labels the American consumer can instantly recognize not only that the wine is from Oregon but where in Oregon the fruit was grown. The new appellation would also strengthen our marketing efforts in regards to the differences between the wines from the two primary grape growing regions within the state.

I urge you to pass this proposal.

Sincerely,

Donna Souza-Postles  
President, La Garza Cellars, Inc.

Notice No. 17

October 16, 2003

Chief  
Regulations and Procedures Division,  
Alcohol and Tobacco Tax and Trade Bureau  
PO Box 5022  
Washington, DC 20091-0021

**Re: Proposed Southern Oregon Viticultural Area (2002R-338P)**

We are writing this letter to express our desire to have the above mentioned proposed regulation pass establishing Southern Oregon AVA. We are currently vineyard owners in the Umpqua Valley and are in the process of developing our winery.

We deem this proposed regulation extremely important and endorse its actualization.

Sincerely,



Stephen & Gloria Reustle  
Reustle Vineyards & Winery LLC

November 11, 2003

Chief  
Regulations and Procedures Division, Alcohol and Tobacco Tax and Trade Bureau  
P.O. Box 50221  
Washington, DC 20091-0221

Attn: Notice No. 17, support of the proposed Southern Oregon Viticulture Area (2002R-338P).

Southern Oregon has seen growth among warm and cool climate winegrape varieties since 1980. Prior to that time, Oregon was known for Pinot noir and other cooler climate varieties such as Chardonnay and Pinot gris. There has been growing recognition for the three appellations in Southern Oregon, namely Umpqua, Rogue and Applegate Valley. The warm climate varieties of note are Syrah, Cabernet Sauvignon, Merlot, Cabernet franc, Granache, Tempranillo, Malbec, Dolcetto, Viognier, Sauvignon blanc, Sangiovese, and Graciano. These varieties originate in Bordeaux and Rhone Valleys of France, Rioja region of Spain, Piedmonte and Chianti regions of Italy, which are considered warmer climates than the Champagne, Chablis, Burgundy, Rhine, and Loire regions of France and Germany for which the Willamette Valley is known.

There are a large number of macroclimates created by the Klamath Mountains in Southern Oregon with deep valleys with warm climates and with cooler climates in higher elevations or rainfall. Secondly, there are hotter daytime temps because of the insulation from the ocean influence combined with cool nights because of either higher altitude or deep valleys that collect cool night air. Therefore, winegrapes grown in the region produce wine flavors and color intensity often greater than in their countries of origin or in California. Good weather at bloom and long warm dry fall ripening weather have given the region ideal conditions for the production of high quality wines.

**Climate:**

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**Soils:**

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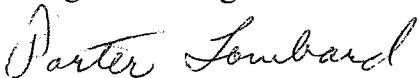
**Winegrape maturity:**

Wine makers recognize that grape maturity should coincide with the end of the area's growing season to produce the highest color, complexity and intensity of wine flavor. This region has a range of growing seasons, which match the maturity requirements for adapted varieties.

**Training methods:**

The region is known for the development of a training system that has been an important advance into controlling vine vigor and increasing light exposure on the heavy and fertile soils in Southern Oregon. This training system is called Scott Henry of Southern Oregon who developed it and it now has wide acceptance in the region. This system nearly doubles the grape yields and increases wine color and flavors.

I believe that Southern Oregon should be designated as an appellation because of similarity of versatile macroclimates and soils, which are able to mature cool and warm climate winegrape varieties for distinctive varietal wines. The region contains two distinct valleys connected by the Klamath Mountains. This mountain range contains peaks that have lower altitudes than surrounding peaks of the Cascade and Coastal range. The region's climates and soils are influenced by the Klamath Mountains. I hope you will designate this region as Southern Oregon Appellation.



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