

# Beaulieu Vineyard

ESTATE BOTTLED NAPA VALLEY WINES • ESTABLISHED 1900  
GEORGES DE LATOUR, FOUNDER LEGH F. KNOWLES, JR., PRESIDENT  
VINEYARDS AND WINERY • RUTHERFORD, NAPA COUNTY, CALIFORNIA 94573 • (707) 963-3671

30 December 1980

Chief, Regulations and Procedures Branch  
Bureau of Alcohol, Tobacco and Firearms  
P.O. Box 385  
Washington D. C. 20044

Subject: Los Carneros Hearing  
14 January 1981  
Santa Rosa, California

Please be advised that the following are requesting to give  
testimony at the Los Carneros Hearings.

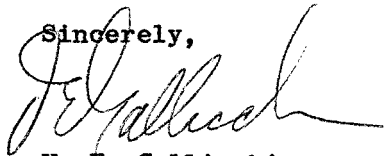
Victor E. Gallicchio, Petitioner

William F. Heintz, Box 418, Sonoma, Calif. 95476  
(707) 938-0827, History of Grape Growing and  
Wine Making in the Carneros Region of Napa Valley

Thomas Selfridge, Winemaker, Beaulieu Vineyard,  
Rutherford, Calif. 94573, (707) 963-3671,  
Soil and Climate

Comments will require approximately 45 minutes.

Sincerely,



V. E. Gallicchio  
Director, Government Relations  
Heublein, Inc.  
P.O. Box 264, St. Helena, Ca. 94574  
(707) 963-2118

THE CLOS DU VAL WINE COMPANY, LTD.

5330 SILVERADO TRAIL  
NAPA, CALIFORNIA 94558

PHONE: 707-252-6711

January 6, 1981

Bureau of Alcohol, Tobacco & Firearms  
Federal Building  
777 Sonoma Avenue  
Santa Rosa, CA

Re: "Los Carneros" Hearing

To whom it may concern:

We appreciate the opportunity to present our point of view regarding the Los Carneros Viticultural area.

We would like to point out, very respectfully, that we do oppose the creation of a "Los Carneros" Appellation which would make such an area an entity distinct from the Napa Valley.


For one thing, we believe it is premature to hold a hearing for the creation of an area which was, hitherto, considered as a Sub-Appellation of the Napa Valley, while the "Napa Valley" Appellation has not yet been defined.

Moreover, having contracted the purchase of grapes with a couple of vineyards of this area, we will lose the possibility of blending those wines with others coming from grapes grown in Rutherford or St. Helena. Because of our contracts and the percentage of grapes coming from each area ( about a 50-50 split) we would lose both the Napa Valley and the Los Carneros Appellation, thus downgrading our label to "North Coast".

We believe our growers stand to lose some revenue and also some of the value of their land.

We thank you for considering our opinion and remain

Very respectfully yours,

  
Bernard M. Portet  
Manager

BMP :mh

**HYDE RANCH**

VISALIA, CALIFORNIA 93277

(2)

February 9, 1981

Chief Regulation and Procedures Division  
Bureau of Alcohol, Tobacco, Firearms  
P.O. Box 385  
Washington, D.C. 20044

Gentlemen,

Hyde vineyards is located at 3250 Sonoma Highway, which is in the center of the Carneros District of Napa County. It is a family owned and operated vineyard, and we intend to produce and bottle wines made only from grapes grown on our vineyards. We feel that the formation of a Carneros District of the Napa Valley will enhance our ability to identify and sell our wines. We strongly favor the adoption of the Beaulieu Vineyards' proposed Carneros District.

The district as proposed includes all of the current and historical Carneros District vineyards sites. After Prohibition Louis Martini and B.V. planted large acreage in the Carneros. More recently many wines of the Winery Lake Vineyards and Carneros Creek Winery have made the area famous. Today many of the established wineries in Napa County are making extensive new plantings in the Carneros District, including Clos du Val, Charles Krug, Cuvaissou, and Acacia.

We feel that the Carneros District, at least for the present, should be limited to Napa County as proposed by Beaulieu Vineyards for the following reasons:

1. The origin of the name "Carneros District" comes from the Carneros Valley and from the Mexican land grant made in 1836, "Rancho el Rincon de los Carneros", both of which are only in Napa County.
2. To the present, only wines from Napa Valley vineyards have been labeled "Carneros District".
3. The heavy red clays of Napa Carneros have changed to black Petaluma adobe as one reaches the county line.
4. The southern Sonoma Valley is somewhat cooler than the present Carneros area.
5. The underground water table is substantially different in Sonoma County.

POST OFFICE BOX 952

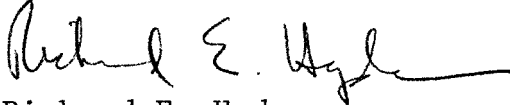
# HYDE RANCH

VISALIA, CALIFORNIA 93277

TELEPHONE 734-7606

Unproven areas with different climate and soil should not be incorporated into a proven area, at least not until the products of such a new area have demonstrated their quality and consistency.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard E. Hyde", with a long horizontal flourish extending to the right.

Richard E. Hyde



3775 THORNSBERRY RD., SONOMA - P.O. BOX 1, VINEBURG, CALIFORNIA 95487

February 12, 1981

Chief, Regulation & Procedures Division  
Bureau of Alcohol, Tobacco & Firearms  
P.O. Box 385  
Washington, D.C.

Subject ; Los Carneros Viticultural Area

Dear Sir,

In your consideration of the Los Carneros Viticultural Area please consider the following points.

- A. The petitioner has not established that the viticultural area is locally and / or nationally known as referring to the area specified in the petition. Fourteen people testified at the Los Carneros Viticultural hearing. All fourteen at some point during their testimony gave evidence or testimony that the proposed western boundry was incorrect.

Wine writers familiar to consumers nationally have written articles concerning the Los Carneros area and none have agreed with the proposed western boundry. Three of these writers specifically are:

1. Jerry Mead

Mr. Meads article was quoted by Mr. Ricci on page 85 of the transcript. Mr. Mead is the head of an organization of over 2000 consumers known as "Wine Investigation for Novicies and Oenolo philes." His column appears weekly in over 100 publications.

2. John Movius

Mr. Movius' comments appeared in the July-August Wine Scene. I was unable too obtain a copy of the article within the time period for written comment. In a telephone conversation with Mr. Movius he felt that the proposed boundry was too far North and that the western boundry should not stop at the county lines. Mr. Movius also stated that Heublien, the petitioner, refused to give him a copy of their petition. He received his copy through a "circutous source." Mr. Movius articles appear on a regular basis in national wine maga-

zines. It may also be noted that Mr. Movius resides in the Napa Valley.

3. Connoisseur's Guide to California Wine  
Volume 4, Issue 4 July-August 1978  
(excerpt enclosed)

- B. The historical or current evidence that the boundries of the viticultural area are as specified in the petition is inadquate. The Los Carneros area as specified has had a strong historical relationship with Sonoma, and continue to have a strong relationship with Napa. Enclosed please find a copy of the "plat of Huichica Rancho" Please note the names "Winters", and "Fly". At one time this area was known as the "Fly District". Mr. Heintz also refered to Mr. Winters in his testimony. The petition also refers to the "Huichica Land Grant". The Huichica Land Grant is intimately related to the history of Sonoma Valley and more specifcally to the City of Sonoma. For your convience in reading this map Huichica Creek, labeled on the map is near, but not on, the current Sonoma - Napa County line.

Furthur, the entire Huichica Rancho was originally part of Sonoma County. The Illustrated History of Sonoma County, published by the Lewis Publishing Company in 1889 state on page 91 the following :

" The Legislature proceeded to divide the Territory into counties..... and confirmed on the 25th of April, 1851, fixing the boundries of Sonoma County as follow: .... thence in a direct line to the Northwestern corner of Napa County to its termination in Cameró Mountains; thence in a direct line to the nearest point of Cameró Creek ; thence down said creek to its entrance into Napa River to its mouth ....."

Other current evidence of the interrelationship of this area has been given in testimony by myself and others, including representatives of Buena Vista Winery, Domaine Chandon, and Mr. Ricci.

The label on the petitioners own wine, the Beaulieu 1976 Carneros Pinot Noir leads consumers to believe that the Los Carneros area does in fact include a portion of Sonoma Valley.

- C. Evidence relating to the geographical features which distinguish the viticultural features of the proposed area have from the surrounding areas have not been presented by the petitioner. We do not question that there does in fact exist a Los Carneros area, having the generally described qualities regarding climate, soil, elevation, physical features, ect., described by the petitioner. The discription given to these geographical features applies equally to the southern end of Sonoma Valley. Extensive testimony is available in the transcript supporting the similarity of the geographical features of the southern ends of both Sonoma & Napa Valleys. The petition does not " distinguish the viticultural features of the proposed area from surrounding areas".

Section 4.25 a (e) (2) states specific requirements for a petition to establish a grape growing region as a viticultural area. The proposed Los Carneros Viticultural area petition is demonstrably deficient on specefcic point raised by parts a, b, and c of this Regulation.

We feel that the Bureau has no choice but to reject the petition as filed. To do otherwise would be in violation of section 4.25 a (e) 2.

It should be further considered that one of the major problems regarding this petition is that it may or may not overlap another viticultural area. I have given what I believe to be a rational solution to this problem. ( Los Carneros Viticultural Area Transcript, pages 57 to 60, pages 70 to 77.) Another question which arises regarding this area is that a political boundary, the Napa - Sonoma County line is perceived as an unbreachable line. Industry Circular Number 80-15 specifically states that a viticultural area may extend across political boundaries.

As the Los Carneros petition cuts through existing vineyards, I ask, how does the Bureau intend to enforce its regulations? If the Bureau is approached by a consumer how will it assure that consumer that a wine meets the Bureau's inflexible percentage requirements? Will vineyards on boundary lines be treated more leniently than vineyards not on boundary lines? Many questions arise.

In considering small subregions such as the proposed Los Carneros, there should be more emphasis on geographical features than on larger areas, such as Napa Valley or Sonoma Valley, where history may predominate. It will be of great benefit to consumers if we are able to logically expand the criteria that they may use to make their selections. The unrestrained granting of petitions to support and protect particular brand names should be avoided.

The Bureau should also consider that while information regarding proposed viticultural areas is available to those who request it in Washington DC., this is of little consequence to a grapegrower who doesn't read the Federal Register or receive industry circulars. As the principle author of the Sonoma Valley Viticultural Area petition we made great effort to contact all interested parties.

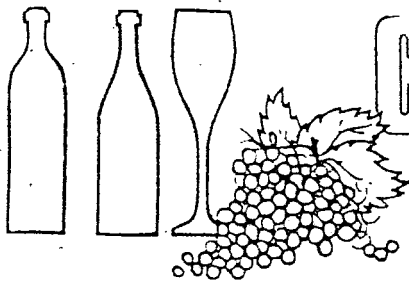
It's quite evident that the Los Carneros petition was presented in quite a different manner. Testimony was given by Mr. Ricci on this fact. ( Los Carneros Testimony page 82). Mr. John Movius related a similar tale in a private conversation with me. Both had been denied information by Heublien representatives. I don't believe this method protects the small grape-grower or consumers. The Bureau should require adequate advance notice in the locality under consideration.

In closing, I offer no new proposed boundaries for the Los Carneros Viticultural area beyond those I suggested during the hearings. I believe that further study and comment should be solicited before the Los Carneros boundaries are established. The petition does not meet the requirements of section 4.25 a (e) (2).

Sincerely,

*John Merritt, Jr.*

John Merritt Jr.



# CONNOISSEURS' GUIDE to California Wine™

*Acc*

72, 73, 74

## Chenin Blanc

In his authoritative 1962 textbook on winegrowing (General Viticulture, 1962), Dr. A. J. Winkler (U.C. Davis) stated that Chenin Blanc plantings in California were "probably in balance with demand." Since that time, California plantings of Chenin Blanc have soared from 250 acres to 20,500 acres. And, judging by the prices that consumers are paying, demand for this white variety has more than kept pace.

Production of Chenin Blanc in seemingly copious amounts has not slaked the interest of the Nation's wine consumers. At this writing, Chenin Blanc is undoubtedly the top selling white varietal wine in the United States. In fact, Chenin Blanc probably outsells the red varietals as well. None of the other leading high tonnage wine grapes -- French Colombard, Carignane, Grenache, Barbera and Ruby Cabernet (which together comprise half of California's total production) -- even begin to command a market response approaching the Chenin Blanc name when it appears on a label.

In the midst of the present white wine boom, Chenin Blanc has been the clear popular leader. While the field may lack an apparent challenger for this front running position, the drab lackluster quality of many of the current offerings gives us pause to wonder if Chenin Blanc can retain its favorable image.

Relatively few of the Chenin Blancs on today's market rise above being ponderous and overly sweet, or, dry, bitter and overly grassy. Few

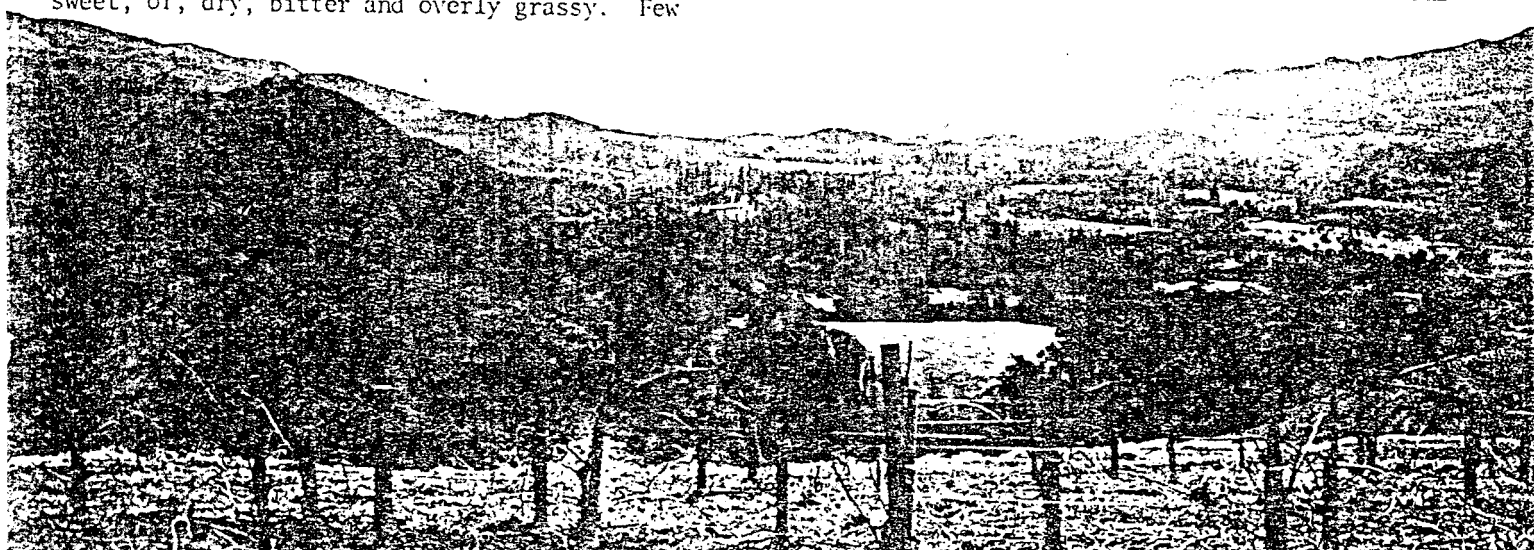
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COVER PHOTO: A view towards San Francisco from the Beltane Vineyard on the slopes of the Sonoma Valley.

CLOSING DATE . . . . . March 25, 1979  
*Tasting and research for this issue are current as of the closing date.*

## Volume 4 \* \* Issue 4





# Sonoma Valley <sup>copy</sup> As A Viticulultural Area

There were vines in the Sonoma Valley more than a decade before the first plantings in the neighboring Napa Valley. The vineyards of the mid-1800s east and north of the town of Sonoma were of earlier and greater importance during that period than any others north of San Francisco.

By the early 1900s, however, the boom had ended in the Sonoma Valley. The multiple scourges of phylloxera, a full-scale economic depression in the 1890s and the 1906 earthquake, which destroyed hillside caves, stone wineries and upright tanks, took extraordinary tolls on the Valley. Prohibition took the ultimate toll. Whereas a number of Napa's great estates (Inglenook, Beaulieu, Beringer and Krug) either stayed in production or rebounded after Prohibition, those of the Sonoma Valley simply disappeared. Only Sebastiani and a couple of bulk producers managed to make it into the post-Prohibition era. Even Haraszthy's famed Buena Vista sat abandoned for forty years.

The renaissance of the Sonoma Valley began in the early forties when journalist Frank Bartholomew unknowingly purchased the former Buena Vista winery. A short lesson in the property's vinous history convinced Bartholomew to replant the vineyards and restore the winery and its earthquake-crippled caverns. Trading heavily on the legend of the flamboyant Count Agoston Haraszthy, Buena Vista and the Sonoma Valley began its reemergence as a place for premium wine growing.

Ambassador James Zellerbach started his famous Hanzell Winery in the Valley in 1956 but the development of other wineries had to wait until California's latest wine boom had begun in earnest. The first of the new wineries began in 1969 when winery consultant Gino Zepponi and optics engineer Norman de Leuze set up their tiny ZD Wines facility. It would be an overstatement to suggest, however, that the Sonoma Valley is awash in either grapes or wine. As the accompanying chart points out, only twelve producing facilities exist even now within the Valley.

<u>Sonoma Valley Wineries</u>	<u>Date (Re)Established</u>	<u>Gal. Storage Capacity</u>
Buena Vista Winery	1857/1947	900,000
Chateau St Jean	1973	150,000
Grand Cru Vineyards	1890/1970	88,000
Gundlach-Bundschu	1858/1973	50,000
Hacienda Wine Cellar	1973	35,000
Hanzell Vineyards	1956	11,000
J J Haraszthy & Son	1978	-
Kenwood Vineyards	1906/1970	250,000
Matanzas Creek Winery	1978	15,000
Sebastiani Vineyards	1904	6,000,000
Valley of the Moon	1944	-
ZD Wines	1969	9,700

## Sonoma Valley

Like the neighboring Napa Valley, the Sonoma Valley is a geographically identifiable unit. It consists of one major watershed which is generally bounded by the Mayacamas Mountains on the east, by the Sonoma Mountains on the west, by the Bay on the South and, as its northern-most boundary, by the urban plain occupied by the City of Santa Rosa.

Its varied temperature patterns, soils and exposures range from very cool and inhospitable to moderately warm and favorable for grape growing. As such, Sonoma Valley is an appellation that covers many more specific micro-areas.

As the term, Sonoma Valley, comes into greater usage on wine labels, the need for further definition will increase. For example, The Sonoma Valley name will appear on Chardonnays grown both at Buena Vista's property next to the Bay and on the Beltane Ranch 2000 feet up the hill above Kenwood. But the wine from these locations will be even more different from each other than Chardonnays grown in Champagne are from Chardonnays grown in the Cote de Beaune region of Burgundy.

It is with an eye toward explaining these differences that we have explored the canyons and hill-tops of the Sonoma Valley. The geographic segmentation that follows represents a first cut at describing the unique sub-regions within what its Indian inhabitants once called the "valley of the seven moons."

## Major Climatic Influences

Inhabitants of the Sonoma Valley are quick to point out that it is the driest and coolest of wine-growing regions in Sonoma County. The entire southern portion of the Valley below the town of Sonoma to the San Pablo Bay is cooled by its proximity to the water. The land is low-lying and retains its chill into mid-morning. By the same token, afternoon winds off the Bay can generally be counted on to cool down the heat of the day. The Valley narrows north of Sonoma, traps more of the heat and is especially kind to warmer varieties in places with good exposure. For the most part, the hills have longer day-time sunlight and are devoted to red varieties. A good deal of the northern valley floor is also planted to reds but with mixed results. Heat summations (the five scale measure of hotness within the growing season -- see Volume 3, Issue 1) place the coldest areas squarely in Region I -- a grouping about equal to the conditions found in Germany. The amount of heat increases as one moves further from the Bay. The lands surrounding the City of Sonoma are Region II in nature, similar to Bordeaux, while the hillsides approach Region III (the Rhone district).

On the northern valley floor, most vineyards are subject to frost damage and are protected by overhead sprinkler systems. At higher elevations frost presents little problem and the vines receive little or no irrigation.

## Geology

Soil is not deep in the Sonoma valley. Many vines are grown in areas with soil depth less than 30 inches. Depths of five feet are unusual. According to many of the wine growers with whom we spoke, the absence of rich, generous soil accounts, in part, for the low yields often realized from Sonoma Valley vineyards.

The soils of the middle and northern valley hills are particularly interesting. The eastern hills are covered with a red soil of a clay loam type high in ironoxide. On sites with southern and western exposure, soils of that type seem to yield high quality Zinfandel and Cabernet Sauvignon. The soils in the western hills are also clay loams but for the most part they are underlain with volcanic formations.

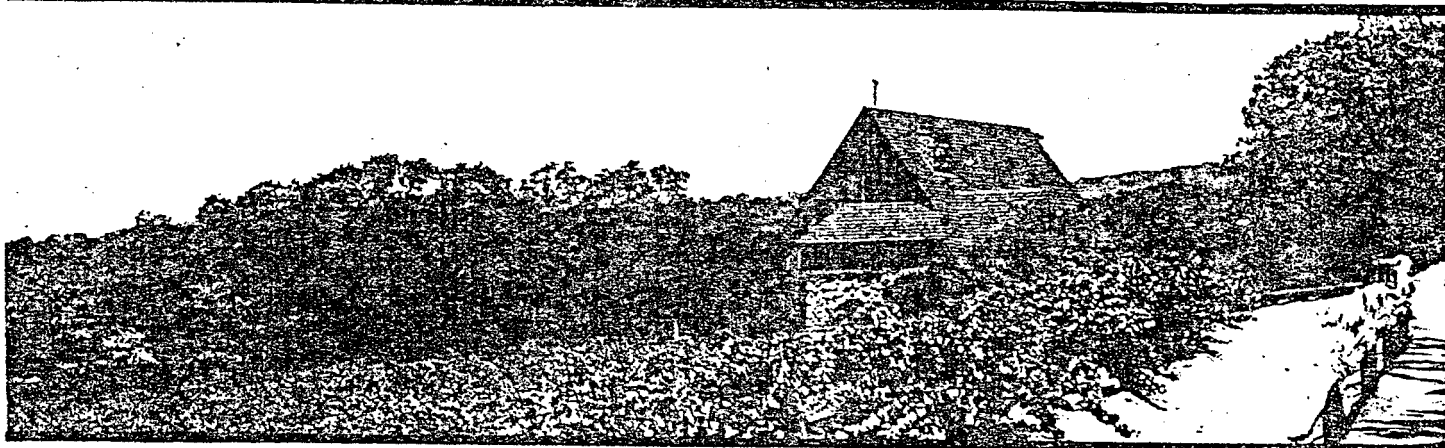
## The Vines

According to Frona Eunice Wait (in her book *Wines and Vines of California* published 1889) the

Sonoma Valley once held well over 6000 acres in vineyards. Those numbers diminished substantially, of course, from 1900 onward to the recent past. Today the vines are coming back in full force and may again number 6000 acres. Buena Vista, for instance owns some 700 new acres planted virtually at the Bay's edge. Fred and Bob Kunde, gentlemen cattle farmers, have built up their vineyard holdings to some 2000 acres. Most of the Kunde production reportedly goes to Sebastiani. In addition, their Wildwood Vineyards handle has been seen on both the Zinfandel and Chardonnay of Chateau St. Jean.

The principal red varieties of Sonoma Valley are Cabernet Sauvignon and Zinfandel particularly in the warmer areas. Pinot Noir is planted primarily in the cooler areas. There are also sprinklings of Barbera and Gamay Beaujolais but very little Petite Sirah is planted anywhere in the Valley.

The whites are predominantly Chardonnay, Riesling and Gewurztraminer. Almost no Chenin Blanc or Sauvignon Blanc is found.



## **Viticultural Subregions of the Sonoma Valley**

*/Photo: Hanzell Vyds*

### CARNEROS/HUICHICA

The gentle slopes immediately adjoining San Pablo Bay are the valley's coolest wine-growing area. Portions of Domaine Chandon's grapes cross the boundary from Napa to Sonoma County just as Buena Vista's 700 acres overlap into Napa County. This area is, of course, one land mass known popularly as Carneros -- and in due time will undoubtedly enjoy its own appellation. The Indians called it Huichica and there is some sentiment for retaining the name.

The area is planted primarily to white grapes and seems most suited to Riesling, Gewurztraminer and high acid Chardonnay. Buena Vista has a substantial Cabernet holding in the area which they claim will produce wines of similar style to the Medoc. To date, these young vines have produced precious little crop for their growers although the grapes have achieved reasonable degrees of ripeness. Only time will tell whether mature, less vigorous vines can produce a full, ripe Cabernet crop.

### SHELLVILLE

The Schellville area is not unlike Carneros in its cold, windy climate. The land is flat, has a high water table and suffered somewhat from salt water intrusion during the drought years.

Vineyard holdings in this area are being developed in rather large blocks by the likes of Sebastiani and Geyser Peak. The Geyser Peak 1974 Pinot Noir limited bottling which rated one-star came from their Schellville vineyards. The soils get increasingly rich in the northwesterly portion of this sub-region and make deep, generous and hospitable vineyards. One Sonoma Valley winemaker told us that the privately held vineyards lying along the western edge of the Schellville area have the "best soil" in the valley.

### VINEBURG

The flat plain lying southeast of Sonoma's city limits has been planted to wine grapes for over 125 years. Old maps of the area read like a Who's Who in nineteenth century winemaking -- Gundlach-Bundschu, Dresel, Charles Krug all had vineyards in this cool growing region.

The area is just slightly more sheltered than Carneros and Schellville. In particular, the Vineburg area has historically produced high quality Rieslings. While Reds from the flatlands do not always ripen well the hilly terrain at the eastern boundary of the Vineburg area produces rather rich Zinfandels in good years.

# Sonoma Valley

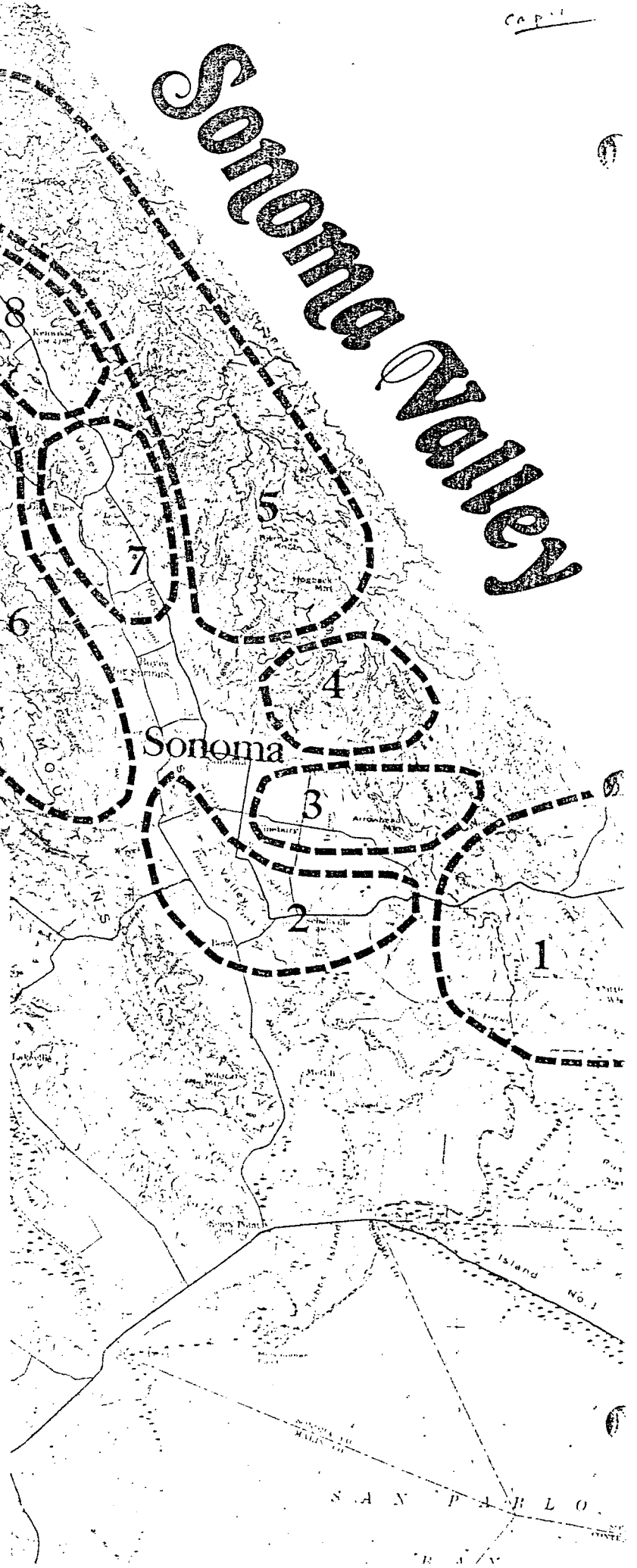
Santa Rosa

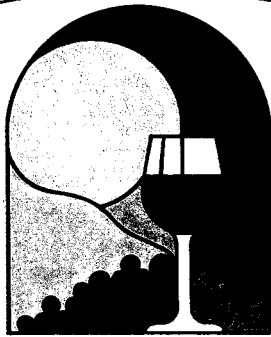


**SONOMA VALLEY  
VINEMAKERS [from top]**  
Albert Magnani of  
Chateau St. Jean; Robert  
Cru; Robert  
Kowski of Kenwood;  
Richard Arrowood  
Chateau St. Jean

### VITICULTURAL SUBREGIONS [key to map]

- 1. Carneros/Huichica
- 2. Schellville
- 3. Vineburg
- 4. Sonoma Foothills
- 5. East Valley Mountains
- 6. Westside Mountains
- 7. Glen Ellen Moguls
- 8. Kenwood
- 9. Bennett Valley





CUVAISON

February 12, 1981

Chief, Regulations and Procedures  
Department of the Treasury  
Bureau of Alcohol, Tobacco & Firearms  
Washington, D.C. 20226

Dear Sir:

Having reviewed 27 CFR Part 9, Notice #360, I am writing to say that this winery, which owns and operates 392 acres within the proposed Los Carneros viticultural area, is entirely in favor of the proposal as defined.

Yours sincerely,

Philip Togni  
President, Winemaker

PT/ms



# Sonoma County Wine Growers Association

January 28, 1981

Chief, Regulations and  
Procedures Division  
Bureau of Alcohol, Tobacco and Firearms  
P.O. Box 385  
Washington, D.C. 20044

Dear Sir:

I am writing at the direction of the Sonoma County Wine Growers Association. We are a group of 34 wineries located within Sonoma County, California. At our last membership meeting we reviewed the application for a Los Carneros viticultural area, which had been presented at the Alcohol, Tobacco and Firearms hearings in Santa Rosa on January 14, 1981.

It was the unanimous decision of our membership that the Los Carneros application not be approved as presented. It has always been our understanding and acceptance that the Carneros region was located in both Napa and Sonoma County. Historically Carneros never has been considered to stop at the Napa County line.

On behalf of our membership I urge that the application for a Los Carneros viticultural area, as presently written, be rejected.

Sincerely,

SONOMA COUNTY WINE GROWERS ASSOCIATION

James Pedroncelli  
President

JP:kc



16



# Buena Vista Vineyards

ESTABLISHED JANUARY 1857 BY COUNT AGOSTON HARASZTHY  
SONOMA, CALIFORNIA 95476 • P.O. BOX 311 • (707) 938-2244

January 30, 1981

Chief, Regulations and Procedures Division  
U. S. Bureau of Alcohol, Tobacco and Firearms  
P. O. Box 385  
Washington, D. C. 20044

Dear Sir:

I wish herewith to support the application of the Sonoma Valley Vintners Association to have the Sonoma Valley legally recognized as a distinct area of origin in wine labelling regulations to take effect January 1, 1983.

I also wish to record herewith my opposition to your proposal, as published in the Federal Register on Decembef 15, 1980, for a so-called North Coast appellation, to encompass Sonoma, Napa and Mendocino counties.

As one of the two topmost premium table wine producing districts in the U.S.A., the Sonoma Valley deserves to stand alone, for the benefit of wine buyers throughout the world.

Establishment of a separate Carneros region appellation should, in my judgment, be deferred, for careful examination after the Sonoma Valley appellation has been promulgated.

The globally recognized qualities of soil and climate which distinguish the Sonoma Valley will be documented by others and need no reiteration from me. But as the owner of these landmark vineyards, I do however feel it would be appropriate to consider a stand-alone Sonoma Valley appellation as an act of justice to history. It would furthermore be recognition that will interest a growing legion of informed wine lovers everywhere. For it was here, in the southern end of the Sonoma Valley, that California wines first achieved important national and international identification, through the vinicultural pioneering, coupled with the promotional genius, of Agoston Haraszthy and his son Arpad.

Yours sincerely,

*Frank H. Bartholomew*  
Frank H. Bartholomew

FHB/j

(22)

GRANVAL, LTD.  
5330 SILVERADO TRAIL  
NAPA, CALIFORNIA 94558  
—  
PHONE: 707-252-6711

January 8, 1981

Bureau of Alcohol, Tobacco & Firearms  
Federal Building  
777 Sonoma Avenue  
Room 113 C  
Santa Rosa, CA

Re: Los Carneros Viticultural Area

To whom it may concern:

We appreciate the opportunity to present you with our opinion.

First, we believe that the Carneros Area to be part of what is currently the Napa Valley, and we feel the hearing should have been postponed until a similiar hearing on the Napa Valley has been held, and proper rules set as to the use of two overlapping appellations.

Second, we think that a vineyard located in the "Los Carneros" Viticultural area should be entitled to choose between the "Los Carneros" Appellation and the "Napa Valley" Appellation and this choice should be final, whomever the actual and/or futuure owner of that winery might be.


As owners of a developing vineyard in the Los Carneros area, we feel that, being one mile away from the Napa city limits, we should retain the Napa Valley Appellation and not be forced into a "Los Carneros" Appellation.

Were it so, the winery to which we intended to sell our grapes, might reduce its offer, either in tonnage or in dollars, because the winery would not be able to blend our grapes with others coming from other vineyards of the Napa Valley and still retain the Napa Valley Appellation.

Therefore, we do oppose the creation of a viticultural area called "Los Carneros" which would make it distinct of the "Napa Valley" Appellation: and therefore, as we see it, reduce not only the value of our property but also the potential value of our crop.

We thank you for your consideration of our letter and remain

Very respectfully yours,

  
Bernard M. Portet  
Manager

BMP:mlh



July 15, 1982

Mr. Steven E. Higgins  
Acting Director  
Bureau of Alcohol, Tobacco, & Firearms  
P. O. Box 385  
Washington, D.C. 20044-0385

Attention: Notice #412

Dear Mr. Higgins:

Sebastiani Vineyards would like to comment on the Los Carneros Viticultural area. We would like to make the following points.

The only way to accurately describe to the consumer the truthful description of Los Carneros would be to include areas that encompass both Sonoma Valley and Napa Valley.

We feel that the overlapping of Los Carneros across two valleys will not in any way cause the consumer to be confused but will rather very accurately describe the grapes and wines from an area of common soil and climate.

We certainly think that there is sufficient historical support for this situation and that the common thread of Haire-Coombs soils and San Pablo Bay influence, certainly indicates that Los Carneros straddles the counties of Napa and Sonoma.



We believe that the boundaries proposed by the B.A.T.F. in notice #412 are not accurate and do not reflect the soil and climatic conditions as they exist in Sonoma County. The presentation by the ad hoc committee of lower Sonoma Valley grape growers and vintners we believe is a very accurate description of the land and should be the area which is encompassed on the Sonoma County side of the Los Carneros region. To make the area any larger, would be to make a mockery of the physical features of the land. To make it any smaller would be the same. The grapes and wines of this area are very distinctive and the consumer should have the opportunity to taste wines that can be presented from this area. The area must be described accurately. We feel that the ad hoc committee has done this very, very well.

We trust that you will move rapidly in this regard, if there is not tremendous amounts of conflicting evidence. However, if evidence being presented to the bureau is in conflict then we would propose that no rule be handed down from Washington D.C. without public hearings in the area. The decisions that we are making now will be affecting people for literally centuries to come. We in the lower Sonoma Valley certainly want to do an accurate and adequate job, not only for ourselves but for our progeny.

Very truly yours,

SEBASTIANI VINEYARDS

  
Jim Carter  
Winemaker

JC/gc

cc: Sam J. Sebastiani  
Doug Davis  
Billy Piersol  
Crawford Cooley - Hacienda Wine Cellars

**CHATEAU BOUCHAINE**  
**1075 BUCHLI STATION ROAD**  
**NAPA, CALIFORNIA 94558**  
**(707) 252-9065**

July 20, 1982

BATF  
P.O. Box 385  
Washington D.C. 20044  
Attention: Mr. Steve Simon

Dear Mr. Simon:

By way of your own announcements and those of Wine Institute, we are now aware of the BATF interpretation of the Los Carneros appellation petition. As a partner and winery general manager of the new Bouchaine Vineyards in the 'Carneros' and a Napa Valley winemaker for some thirteen years, may I speak to the issue.

All of us agree that a wine label should properly inform the public of the source of the grapes. Furthermore, I feel that the information on labels serves both to protect and to educate the public. The Carneros is a historical grape growing region, but it is not well known to the public. There is a growing awareness among winemakers that the Carneros as a sub-region of Napa Valley may be a very good area for Chardonnay and Pinot Noir. We feel it is important that the consumer know that the Carneros area in Napa County is understood to be, as it is in fact geographically and politically, a sub-region of Napa Valley. Considering the interpretations and decision-making processes in the Napa Valley petition, certainly the Napa County portion of Carneros is as deserving to a Napa Valley regional appellation as Pope Valley or Wooden Valley.

Therefore, I would argue a reconsideration of your interpretation on the basis of the following: (1) Subregional petitions ought to be analyzed according to their relationship to the region, (2) the label should state both regional and sub-regional names, and (3) there are political and geographical bases that support a Napa Valley-Los Carneros appellation separate and distinct from Sonoma County. The now existing vineyards that straddle county lines could be 'grandfathered' in to the

July 20, 1982

Mr. William T. Drake, Jr.  
BATF Treasury Department  
1200 Pennsylvania Avenue, N.W.  
Washington, D. C. 20026

Re: Appellation of Origin  
Carneros District

Dear Mr. Drake:

We have just been apprised of the proposed regulation delineating the Carneros District as a separate appellation of origin. In general, we are pleased with the boundary which has been recognized as the Carneros District, but we are greatly disturbed by the over-simplification of the geographical designation. We believe that, as written, the new appellation would confuse rather than clarify the origin of wine produced from grapes from within the region.

Historically, both the Napa Valley and Sonoma Valley have been recognized throughout the United States and Europe as distinct growing areas. Each of these growing areas have developed excellent reputations for the fine wines produced within their boundaries. Because of their vast size, however, each of these areas can and should be subdivided into definable subdistricts by microclimate and topography. Although the immediate wine community may recognize these subdistricts without the need to delineate the larger district in which they are found, to the wine buying public at large the integrity of the subdistrict would not be recognized absent the association of such subdistrict with the larger area in which they are found.

With respect to the appellation of origin for the Carneros District, we propose that you establish the Carneros District as a subdistrict and permit the labeling of wines as "Napa Valley - Carneros District" and "Sonoma Valley - Carneros District". It would not be important whether the county line or watershed sufficed as the dividing line between the two appellations/sub-appellations. With respect to those few vineyards which lie both in Napa and Sonoma counties, a determination could be made on a case-by-case basis as to

Mr. William T. Drake, Jr.  
July 20, 1982  
Page Two

which appellation they would be entitled to or, in the alternative, they may be entitled to use simply the sub-appellation of Carneros District.

The use of both an appellation and sub-appellation is not without precedent. In France, for example, a wine in Burgundy would be entitled to the appellation of Burgundy, Cote des Nuits or Cote des Beaune, the village such as Nuits St. Georges and the vineyard such as Les St. Georges. In Bordeaux, a wine is entitled to the appellation of Bordeaux, Madoc, the Village St. Julien and the Chateau property designation.

It would appear that utilization of both an appellation and sub-appellation would serve to educate the public. However, the loss of the utilization of the designation Napa Valley or Sonoma Valley (which for many is the only appellation of origin with which they may currently be familiar) would be most confusing.

We appreciate your consideration of this request.

Very truly yours,

  
Jerry J. Goldstein

JJG:sw

July 24, 1982

R.P.

William T. Drake Jr.  
BATF Treasury Dept.  
1200 Penna. Ave. N.W.  
Washington D.C. 21226

Dear Mr. Drake;

During the hearings held in Santa Rosa, Calif., I was left with the feeling that the Carneros Appellation we were attempting to delineate would ultimately be split to become a sub-appellation or district of the established Napa Valley and Sonoma Valley Appellations, (thus, Sonoma-Carneros and Napa Valley-Carneros).

In the publications that come from the USDA Soil Conservation Service in cooperation with the University of California Agricultural Experiment Station (Napa issued 1978, Sonoma issued May, 1972), the soils that predominantly make up the area I would propose calling Napa Valley-Carneros District are: the Haire series, Diablo series and the Cole series. Whereas the Sonoma area contains; the Los Robles series, Goulding Toomes series, Kidd series, Reyes series, Zamora series and the Clear Lake series, NONE of which appear in the Napa-Carneros area east of Huichica Creek.

On the maps 113 and 114 for Sonoma County, the area in question is named Huichica. On maps 43 and 45 in Napa County the area is named Rincon de Los Carneros. There is no mention of the name Carneros west of Huichica Creek.

Those of us who have been growing and marketing grapes for a considerable time have established a reputation for quality that is recognized by the local wineries we sell to and the consumer who purchases the wines made from our grapes. We believe that those growers in the Sonoma area are attempting to capitalize on this reputation. We do not mind that attempt as long as there is a differentiation between Napa and Sonoma. The Sonoma vineyards in the area of question were established after the Carneros reputation.

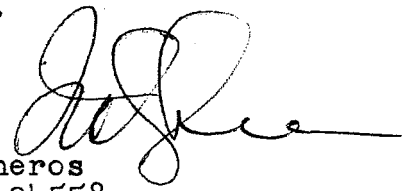
I would like to see the area designated as Napa Valley-Carneros District and Sonoma Valley-Carneros District. NOT Carneros Appellation all the way from the Napa river to the west boundary of the Sonoma Valley Appellation.

I am enclosing one of the labels from the Acacia Winery that purchases some of my grapes. This is the way I would like to see all of my grapes ultimately named on the labels of all the wineries I do business with. This way, with a winery bottling a particular vineyard separately, the grower along with the winery can prosper for doing an outstanding job. Also, when a consumer purchases a bottle with this sort of label they know what they are buying. Our label designation with the Lee Vineyard connotes 100% Lee Vineyard grapes. Nothing could be more clear to the public.

Thank you for your attention to this matter.

Sincerely,

Ira J. Lee  
1045 Los Carneros  
Napa, Calif. 94558



# WINERY LAKE

5200 SONOMA HIGHWAY NAPA

CALIFORNIA 94558

AREA CODE 707  
226-5991

R. di Rosa

Rene  
7-29-82

July 25, 1982

Mr. William Drake, Jr.  
BATF, 1200 Penn. Ave. N W.  
Washington, D. C. 20226

Dear Mr. Drake;

In Washington a few weeks ago, with other directors of the California Grape Growers Association, it was most helpful to meet you.

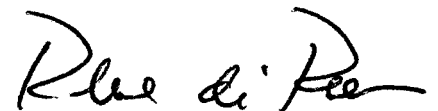
Now, I wish to give you the view of many of us who are growing grapes here in Carneros and our concern for a proper appellation. We feel strongly that the Beaulieu presentation is acceptable if it would have as a southern boundary, not the Solano line with its miles of intervening swamp land, but rather the Southern Pacific Railroad line. With this as a southern limit and the Napa River to the east and Sonoma County to the west, as Beaulieu suggests, then Los Carneros would become meaningful--- providing it would be recognized as a part of the Napa Valley.

If Sonoma wished to have a Los Carneros designation, then that would seem to us to be quite acceptable.

Incidentally, I presently sell grapes to some eleven wineries that use a Winery Lake, Carneros designation on their label. In fact, this vineyard was California's first to be so identified and I attach such a back label.

Thank you for your attention to our concern.

Sincerely,



RENE di ROSA

### 1972 WINERY LAKE PINOT NOIR

The wine in this bottle was made entirely from Pinot Noir grapes grown at Winery Lake Vineyards in the cool Carneros region of Napa county. The growing season of 1972 might be called a year of extremes, with a cold, low rainfall winter, unseasonable early spring growth followed by spring frosts in late March and early April, a searing summer heat wave with temperatures reaching 116°F, and disastrous rains during mid and late harvest. Fortunately, Pinot Noir is an early ripening variety, and these grapes were picked on October 2, 1972 before the rains set in, at an excellent sugar of 23.2° Balling and acid of 1.18 gm/100 ml.

After crushing and stemming, the must was fermented four days in a redwood vat. The wine was then separated from the grape skins and fermented to complete dryness in 50 gallon oak barrels. It has undergone a natural malo-lactic fermentation during its two years in American and Limousin oak barrels, which has softened the wine, and added complexity and a hint of oak.

The wine was bottled on August 3, 1974 and will improve with bottle age. It is natural and unfinned, and during aging may produce a slight sediment.

ZD Wines P.O. Box 900 Sonoma, Ca. 95476



In Historic Buena Vista Vineyards

# Hacienda Wine Cellars

July 26, 1982

Mr. Steven E. Higgins  
Acting Director  
Bureau of Alcohol, Tobacco & Firearms  
P.O. Box 385  
Washington, D.C. 20044-0385

Attention: Notice \$412

Dear Mr. Higgins:

In January 1981, when BATF held public hearings in Santa Rosa regarding the Sonoma Valley Viticultural Area petition, I, as president of the Sonoma Valley Vintners Association made part of that presentation. The following day we also made our comments regarding the Los Carneros Viticultural Area petition. The substance of that testimony was that the petition as filed did not properly delineate the Carneros area. We made two points in our testimony:

1. The Los Carneros area property extended well into Sonoma County at the Southern end of the Sonoma Valley.
2. That to properly define the area would require additional detailed study.

As a member of the Southern Sonoma Valley Ad Hoc Committee I offer the following comments regarding the proposed Los Carneros Viticultural Area as it pertains to Sonoma County.

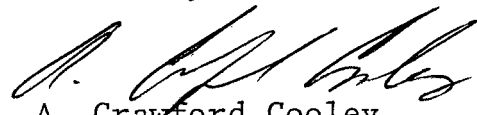
1. I am the President of Hacienda Wine Cellars located in the Sonoma Valley Viticultural Area. We grow and purchase grapes in the Southern Sonoma Valley adjacent to and in the proposed Los Carneros Area. My family have been associated with Sonoma County since 1845.



2. The revised boundaries of the Sonoma County portion of the Los Carneros Viticultural Area as proposed by the Ad Hoc Committee more completely and correctly delineate that area. This conclusion is based not only on soils in the area but most importantly on climate. There is a homogeneity of temperature, fog intrusion and winds that unite the Los Carneros Area.
3. The question of an overlapping area which includes parts of two counties will probably only occasionally be the correct solution in determining viticultural areas. In the case of the Carneros District it is the only correct solution.
4. Enclosed with this letter is a copy of an article which appeared in the Sonoma Index-Tribune of Wednesday, July 7, 1982. This material was prepared and submitted so that all wineries and grapgrowers in the area would have the opportunity to comment on the proposed appellation and particularly the proposed boundaries. No unfavorable comment has been received.

In summary, I urge BATF to revise the boundries of the Sonoma County portion of the proposed Los Carneros Viticultural Area to conform to those submitted by the Southern Sonoma VALley Ad Hoc Committee. Should these boundaries raise questions within BATF I would encourage you or your representative to come to the area to personally inspect the proposed boundaries and talk with people here or to hold public hearings in Sonoma County so that the many interested parties may give testimony.

Sincerely,

  
A. Crawford Cooley  
President

cc: Jim Carter

**Sonoma Valley effort**

# Carneros appellation sought by winegrowers

Having successfully secured the Sonoma Valley Viticultural Area Appellation, winegrowers in the southern portion of Sonoma Valley are now attempting to secure a Carneros District Viticultural Appellation.

A similar move is underway in southern Napa County which has comparable growing conditions.

Sonoma Valley grape growers and other landowners are requested to comment on the proposed Sonoma-Carneros District by sending written statements to either Jim Carter, Sebastiani Vineyards, Box AA, Sonoma, 95476, or Crawford Cooley, Hacienda Wine Cellars, Box 416, Sonoma, 95476.

Comments will be forwarded to the BATF along with other material in support of the petition prior to August 3, 1982.

Approval is necessary if the "Carneros District" is to be used as the appellation of origin on wine labels after January 1, 1983

when new federal regulations go into effect.

**BOUNDARIES** of the Carneros District Viticultural Area in Sonoma Valley are proposed as: All of the land within the Sonoma Valley Viticultural Area lying south of the following line—commencing at the intersection of Hwy. 121 and the Napa County line, westerly along the highway to its intersection with Napa road, westerly to its crossing of Felder Creek, northwesterly up Lewis Creek to the point where it crossed the 600-foot contour line, then due west to the west boundary of the Sonoma Valley Viticultural Area.

The Carneros Region has an overlapping area with the southern end of the Napa-Sonoma County line, and as a result has been the center of some controversy. It has been suggested that microclimatic areas such as these be connected with the

larger area—hence a Sonoma-Carneros and Napa-Carneros.

The Sonoma Valley appellation was formally approved by the BATF in December 1981. That decision culminated over two years worth of work on the part of the Sonoma Valley Vintners' Association, which initially filed a petition for appellation recognition in July 1979.

History of the area, topography, soil types, climate and other characteristics of the region are taken into account when appellations are considered.

Beginning in January 1983, when the new regulations go into effect, wines must contain at least 75 percent of the grape variety designated on the bottle label. If the label indicates that it is Sonoma Valley wine, 75 percent of the grapes must have been grown in Sonoma Valley. If dubbed "estate bottled," it must contain 100 percent Sonoma Valley-grown grapes.



# Joseph Phelps Vineyards

July 26, 1982

Mr. Steven E. Higgins, Acting Director  
Bureau of Alcohol, Tobacco & Firearms  
P.O. Box 385  
Washington, D.C. 20044-385

Subject: BATF Notice #412

Dear Mr. Higgins:

The undersigned is a member of the Southern Sonoma Valley Ad-Hoc Committee and has received a copy of Mr. Jim Carter's recent letter to you commenting on the subject notice.

Our winery is located near St. Helena, which is in a warmer zone of the Napa Valley. Accordingly, we have all along had a pronounced interest in securing grape sources from the cooler Carneros region in order to complement, through blending, the wines produced on our home vineyards. To this end, we made an investment in 1973, together with the Sangiacomo brothers of Sonoma and others, in the development of what we regarded to be a prime Carneros region vineyard located on the west bank of Sonoma Creek in Southern Sonoma County. This vineyard is designated with both an A and a P on the map enclosed with Mr. Carter's letter and entitled 'Location of Ad-Hoc Committee Vineyards'.

We support all of the positions of the Southern Sonoma Valley Ad-Hoc Committee as set forth in the aforementioned commentary and wish to advance for your consideration the further specific comments;

1. We made the investment described above nine years ago out of the conviction that the property (west bank of Sonoma Creek south of highway 121) was typical of the best of the Carneros region in both climate and soils.

Mr. Steven E. Higgins, Acting Director  
Bureau of Alcohol, Tobacco & Firearms

2.

2. We have made a substantial quantity of wine from both the Pinot Noir and Chardonnay grapes grown on this vineyard.

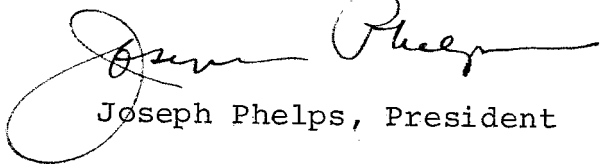
3. Both the chemical and sensory evaluation of these wines fully support our conviction that this location is typical of the best of the Carneros region.

4. Notice #412 is correct in establishing a Los Carneros Viticultural District, but it does not go far enough. It stipulates as its western boundary the center line of Sonoma Creek. The conditions which influence the dominant character of the Los Carneros district - the climate - obviously exist on both sides of Sonoma Creek and continue westerly to the hills beyond.

We hope you will find the foregoing helpful and that you will call upon us if we may be of any further assistance to the Bureau in the reconsideration of the boundaries established in notice #412. Thank you.

Sincerely,

JOSEPH PHELPS VINEYARDS



Joseph Phelps, President

JP:ed

*KENNETH E. NILES*

201 West Watmaugh Road  
Sonoma, California 95476

July 26, 1982

Mr. Stephen E. Higgins, Acting Director  
c/o Chief Regulations & Procedures Division  
Bureau of Alcohol, Tobacco & Firearms  
P.O. Box 385  
Washington, D.C. 20044-0385

Dear Mr. Higgins:


As an interested grape grower in southern Sonoma Valley, I would like to indicate my strong support for Proposal No. 412 dealing with the Los Carneros viticulture region.

Having lived in Sonoma Valley for approximately nine years, I have been very aware of the micro climates involved. Very frequently I find myself comparing the temperatures of downtown Sonoma (approximately two miles north) with the temperatures at our vineyard at many different times during the day and during the year and can testify that there normally is a significant difference in temperatures during the months of May through August due to the cool southwesterly breezes experienced at our vineyard and house located on Watmaugh Road.

Our grapes, which are Chardonnay and Pinot Noir, consistently obtain high acidity and I have been complimented by many individuals and wineries as to the quality of the grapes. I feel very strongly that if a boundary line is to be determined in order to designate an area within the Los Carneros district, a logical north boundary line would be approximately one mile south of the town of Sonoma, which is where Leveroni Road and Napa Highway form an east-west arterial.

Thank you for considering my comments.

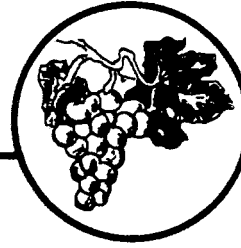
Sincerely,

  
Kenneth E. Niles

:gc

*Napa Valley* GRAPE GROWERS ASSOCIATION

4075 SOLANO AVENUE -- NAPA, CALIFORNIA 94558



Phone 707-944-8311

707-228-8028

DIRECTOR, BUREAU OF  
ALCOHOL, TOBACCO & FIREARMS

1982 JUL 30 AM 9:07

RECEIVED

*HDR (RE) 11/12*  
*RIP*  
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*7/30*

July 26, 1982

Mr. Stephen Higgins  
Acting Director  
Bureau of Alcohol, Tobacco & Firearms  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20226

Dear Mr. Higgins:

The Napa Valley Grape Growers Association Board of Directors is very concerned about the proposed Carneros Viticultural Area.

The Board urges your consideration of a Carneros-Napa Valley and a Carneros-Sonoma Valley as separate viticultural areas. The boundaries of the larger viticultural areas would then coincide with the shared boundaries of any sub-viticultural area included within those well-known larger areas (i.e., the southern and eastern boundaries of the sub-viticultural area Carneros-Napa Valley would coincide with the south-eastern and eastern boundary of the viticultural area, Napa Valley).

The intent in establishing the viticultural area classification was to clarify winegrowing area delineation for the benefit of the wine-consuming public. It would be, in our opinion, more consistent and clear to recognize the fact that the larger viticultural areas were established using definite criteria to assure their integrity as distinct, separate, and unique growing regions. It would follow that sub-viticultural areas within the larger areas should recognize the integrity of the larger area's boundaries.

The Board believes that the consumer would be better served by preserving the integrity of the Napa Valley viticultural area, as well as the Sonoma Valley viticultural area, and not to confuse the consumer with overlapping areas. The Board urges your careful consideration of the above points.

Sincerely,

Robert A. Dwyer  
Executive Director

RAD:sls

July 26, 1982

William T. Drake Jr.  
BATF, Treasury Dept.  
1200 Pennsylvania, N.W.  
Washington D.C. 20226

Dear Sir,

I wish to add my support and urge you to support those who are for the establishment of a Carneros viticultural area. The growing conditions in the Carneros region of the Napa Valley are excellent for prime quality Pinot Noir and Chardonnay wine grapes. This uniqueness can best be recognized by the Carneros Appellation.

I would also support the designation as the "Carneros Region of the Napa Valley" or "Napa Valley Carneros Region."

Sincerely,

Alex I. Rasmussen  
Rasmussen Vineyard  
2125 Cuttings Wharf Rd.  
Napa, Ca 94558

THE CLOS DU VAL WINE COMPANY, LTD.  
5330 SILVERADO TRAIL  
NAPA, CALIFORNIA 94558  
—  
PHONE: 707-252-6711

R.P. -

July 27, 1982

Mr. William T. Drake, Jr.  
BATF Treasury Department  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20226

Re: Carneros Appellation

Dear Mr. Drake:

As a winery that has purchased grapes from the Carneros District during the past few years, we are pleased to let you know of our position on the subject of a Carneros Appellation.

Because of its physical location, the Carneros District is really distinct from the rest of the grape growing areas of the Napa Valley or Sonoma County and therefore deserves an appellation of its own.

The grapes coming from this area have, indeed, acquired a strong reputation on their own merits. However, the Napa County "Carneros" is quite different from the Sonoma County "Carneros" having more rolling hills, warmer weather, different wind conditions, etc. Moreover, the reputation of the Carneros District has been achieved mostly by grapes from Napa County.

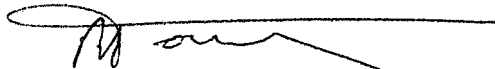
The "Napa Valley" appellation has been granted to so many areas of Napa County that it has lost much of its signification. Therefore, it would be good that a well defined viticultural area be established. The "Carneros District" of "Napa Valley" which would be limited to:

North--Napa County Limits, Browns Valley Road  
East--Napa River  
West--Napa/Sonoma County Line  
South--Railroad tracks.

But, for wineries which buy grapes from other parts of the Napa Valley, there should be the possibility of using their appellation, "Napa Valley" since the Carneros District is in an area that the BATF already recognized as being part of this Napa Valley.

We hope you will take our opinion into consideration and appreciate your efforts in this appellation work.

Very sincerely yours,



Bernard M. Portet  
Manager

BMP:dw



R.P.

Dear Sir as person

Cancer in the "Carmenos Appellation"

After working for many years in the wine industry, my family suggested that we buy land and plant a commercial scale vineyard. Lacking the financial clout of the large producers, I recommended that we locate in the Napa Valley. I felt that with modest means we would be more successful in an appellation of high bottle price.

Since we also lacked the resources to await the maturation of red wines, I further recommended locating in the cooler

end of Napa, where one could produce high quality white wines. I was aware of the good results in early ripening varieties, of Carneros Creek Winery, an Acacia winery. Also many excellent white wines had been produced from the grapes of Renée De Roso by various producers.

I consequently recommended location in the Carneros Area, where a small producer could be successful in the high-price-fast turnover white wine market. I now feel that this investment and years of work are threatened by the inclusion of vast tracts of deep salty Sonoma county.

No Sonoma winery has ever contributed to the building of this reputation. In fairness to the pioneer users of the "Carmenos" name, I would suggest stopping the region at the county line. If you must include untried vineyards in the region please at least make two appellations Carmenos Napa Co. + Carmenos Sonoma Co. Then the Big Shellville producers can make their own reputation using our name. This would be more fair to the small Napa producers who brought attention to the region in the first place.

Sincerely  
Lawrence W. Hyde

Santa Rosa, Ca.  
July 27, 1982

Mr. Steven E. Higgins  
Acting Director  
Bureau of Alcohol, Tobacco, & Firearms  
P. O. Box 412  
Washington D.C. 20044 - 0385

ATTENTION NOTICE 412

Dear Mr. Higgins:

I have read the statements made by the SOUTHERN SONOMA COUNTY AD HOC COMMITTEE regarding the LOS CARNEROS VITICULTURAL AREA and their recommendations, a copy of which is attached. I agree entirely with their statements and recommendations.

I am co-owner, in partnership with a family trust which I established several years ago to provide for the livelihood of my handicapped son in his old age, of a thirty acre vineyard located at vineburg, a rural community near the town of Sonoma in Sonoma County, California. The vineyard is located within the boundaries of the area recommended by the AD HOC Committee for inclusion in the CARNEROS VITICULTURAL AREA.

I earnestly request that the subject area of Sonoma County be included in the LOS CARNEROS VITICULTURAL AREA.

Sincerely  
George V. Johnson  
Partner Vineburg Vineyards

SOUTHERN SONOMA VALLEY AD HOC COMMITTEE  
COMMENT ON LOS CARNEROS VITICULTURAL AREA

TO:

Mr. Stephen E. Higgins  
Acting Director  
c/o Chief Regulations & Procedures Division  
Bureau of Alcohol, Tobacco & Firearms  
P. O. Box 385  
Washington, D.C. 20044-0385 (Notice No. 412)

FROM:

Jim Carter, Chairman  
Southern Sonoma Valley Ad Hoc Committee  
c/o Sebastiani Vineyards  
P. O. Box AA  
Sonoma, CA 95476

Dear Mr. Higgins:

An interested group of grape growers and wineries in Southern Sonoma Valley would like to comment on Notice No. 412, the Los Carneros Viticultural Area. The comment of this group follows:

I. Composition of the Southern Sonoma Valley Ad Hoc Committee

The following individuals comprise the committee:

Jim Carter, Chairman (Sebastiani Vineyards)  
Crawford Cooley (Hacienda Wine Cellars)  
John Merritt (Arroyo Sonoma Winery)  
Angelo Sangiacamo (Grower)  
Joseph Phelps (Joseph Phelps Vineyards)  
John Batto (Grower and President North Coast Counties  
Grape Growers)  
Will Nord (Domaine Chandon)  
Steve Hill (Grower)  
Jean-Marie Martin (Geyser Peak Winery)  
Ken Niles (Grower)  
Jim Bundschu (Gundlach-Bundschu Winery)  
Hubertus von Wulffen (Buena Vista Winery)

Enclosed you will find a map locating the vineyards controlled or owned by the members of the committee. As you can see, the members of the committee are intimately involved and eminently qualified to comment on lands in the Southern Sonoma Valley.

II. Scope of our Comment

The committee will limit its comments to the Sonoma County portion of the proposed Los Carneros Viticultural Area. Individual members may expand their comments to include Napa County.

### III. Overlap

The committee sees no problem with the Los Carneros Viticultural Region overlapping and being a sub-region of the already defined Sonoma Valley and Napa Valley Viticultural Regions. In fact, the committee finds that an overlap is the only accurate and truthful way to define the southern end of the Sonoma and Napa Valleys in a viticultural sense. The committee does not believe that such an overlap will cause any consumer confusion.

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The committee feels that Notice No. 412 gives sufficient historical evidence that Los Carneros is a name commonly applied to the lower Sonoma and Napa Valleys.

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The Los Carneros' is the southern ends of the Sonoma and Napa Valleys which area is criss-crossed with sloughs and tributaries of Sonoma Creek and the Napa River. See enclosed USGS maps for detailed topographical data.

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Haire-Coombs soils dominate the grape growing areas in the Los Carneros, though in both counties several other soil types exist. A soils map of the Sonoma County portion is attached.

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The climate of Los Carneros is dominated by the proximity of San Pablo Bay. Compared with surrounding areas, the climate is more moderate and is characterized by lower highs and higher lows than areas to the north. The high temperature of the day during the growing season is usually reached by 2:00 p.m. and then the cooling, often strong winds begin to blow across the gently rolling Los Carneros District. The proposed northern line of demarcation gives an approximate upper limit to these cooling afternoon winds.

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The grapes of Los Carneros are characterized by low pH and high total acidity as compared to other Sonoma and Napa Valley grapes when harvested at similar sugar levels for a specific variety.

The dates of harvest are often one week up to three weeks difference for the same varieties, even when separated by as little as 1/4 mile. The effect of the cool climate is dramatic.

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Grape yield of a clone grown inside the proposed Los Carneros District is usually lower than a similar clone grown in a warmer, more fertile area.

#### VIII. Specific Boundaries of the Sonoma County Portion of the Los Carneros Viticultural Region

Beginning at the junction of the lines dividing Napa, Solano and Sonoma Counties, thence southward and westward along the shores of San Pablo Bay to the center line of Tolay Creek at the point at which said creek enters San Pablo Bay, thence northerly along said center line to the junction of Tolay Creek and State Highway 37, thence west along said highway to its junction with State Highway 121, thence in a straight line to Wildcat Mountain, thence continuing in a northwesterly direction along a straight line which joins Wildcat Mountain and Sonoma Mountain until reaching a point on said straight line which is due west of the headwaters of Lewis Creek, thence due east from said point to the headwaters of Lewis Creek, thence southward along the center line of said creek to the junction of Lewis Creek and Felder Creek, thence eastward along the center line of Felder Creek to the junction of said creek and Leveroni Road, thence eastward along said road to the intersection of Leveroni Road and State Highway 12, thence eastward along Napa Road to the junction of said road and State Highways 12 and 121, thence eastward along said highway to the junction of said Highways and the line dividing Napa and Sonoma Counties, thence along said line to the point of beginning.

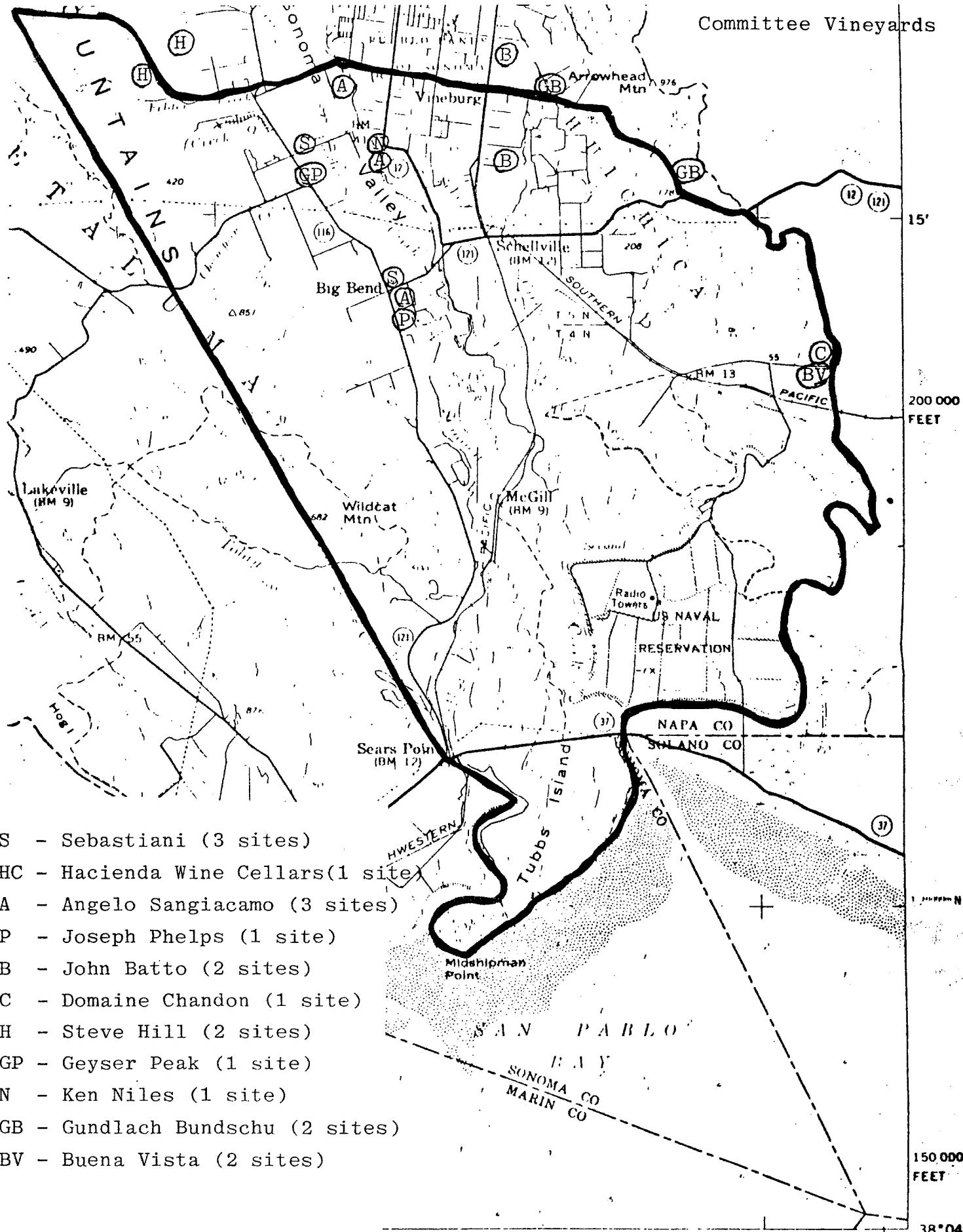
#### IX. Summary

Enclosed you will find one copy of each of six (6) U.S.G.S. 7.5 minute series maps. The Sonoma County section of the Los Carneros Viticultural District has been outlined on these maps. These are the largest scale topographical maps covering the area in question.

The Los Carneros Viticultural District does exist. It does straddle the southern tips of the Sonoma and Napa Valley Viticultural Districts. It is an area of primary Haire-Coombs soil but the chief and dominating characteristic of the area is the cooling and moderating influence of San Pablo Bay. This unique weather pattern imparts a distinctive and identifiable character to the grapes and wines of the area.

We hope that our testimony, coupled with that of the Napa County growers and vintners, will provide the needed information to the Bureau to Accurately define the Los Carneros Viticultural Area.





- S - Sebastiani (3 sites)
- HC - Hacienda Wine Cellars (1 site)
- A - Angelo Sangiacamo (3 sites)
- P - Joseph Phelps (1 site)
- B - John Batto (2 sites)
- C - Domaine Chandon (1 site)
- H - Steve Hill (2 sites)
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- N - Ken Niles (1 site)
- GB - Gundlach Bundschu (2 sites)
- BV - Buena Vista (2 sites)



V. SANGIACOMO and SONS

(707) 938-5503

Mailing Address:  
P.O. Box 324  
Sonoma, CA 95476

July 28, 1982

Street Address:  
21543 Broadway  
Sonoma, CA 95476

Mr. Steven E. Higgins, Acting Director  
Bureau of Alcohol, Tobacco and Firearms  
P. O. Box 385  
Washington, D. C. 20044-0385

Attention: Notice No. 412

Dear Mr. Higgins:

I am a grower in the lower Sonoma Valley. My family has been farming grapes, apples and pears in this area for the past 55 years.

We have 500 acres of grapes in the proposed Los Carneros District and we are very concerned that the Los Carneros Viticultural area be accurately described because of the tremendous financial impact it will have on ourselves.

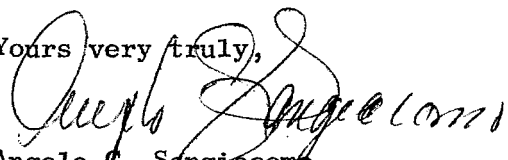
The grapes in the Los Carneros District are low-yielding, distinctive and unique. We have been receiving bonuses from Domaine Chandon and other wineries because of being in the Los Carneros District. If we are not included in the proposed Los Carneros District this will result in severe financial losses due to our low yields and loss of bonuses.

There were several hundred acres of pears along Los Carneros Avenue and for years we had the same harvest starting dates. The same was true for the Gravenstein Apples.

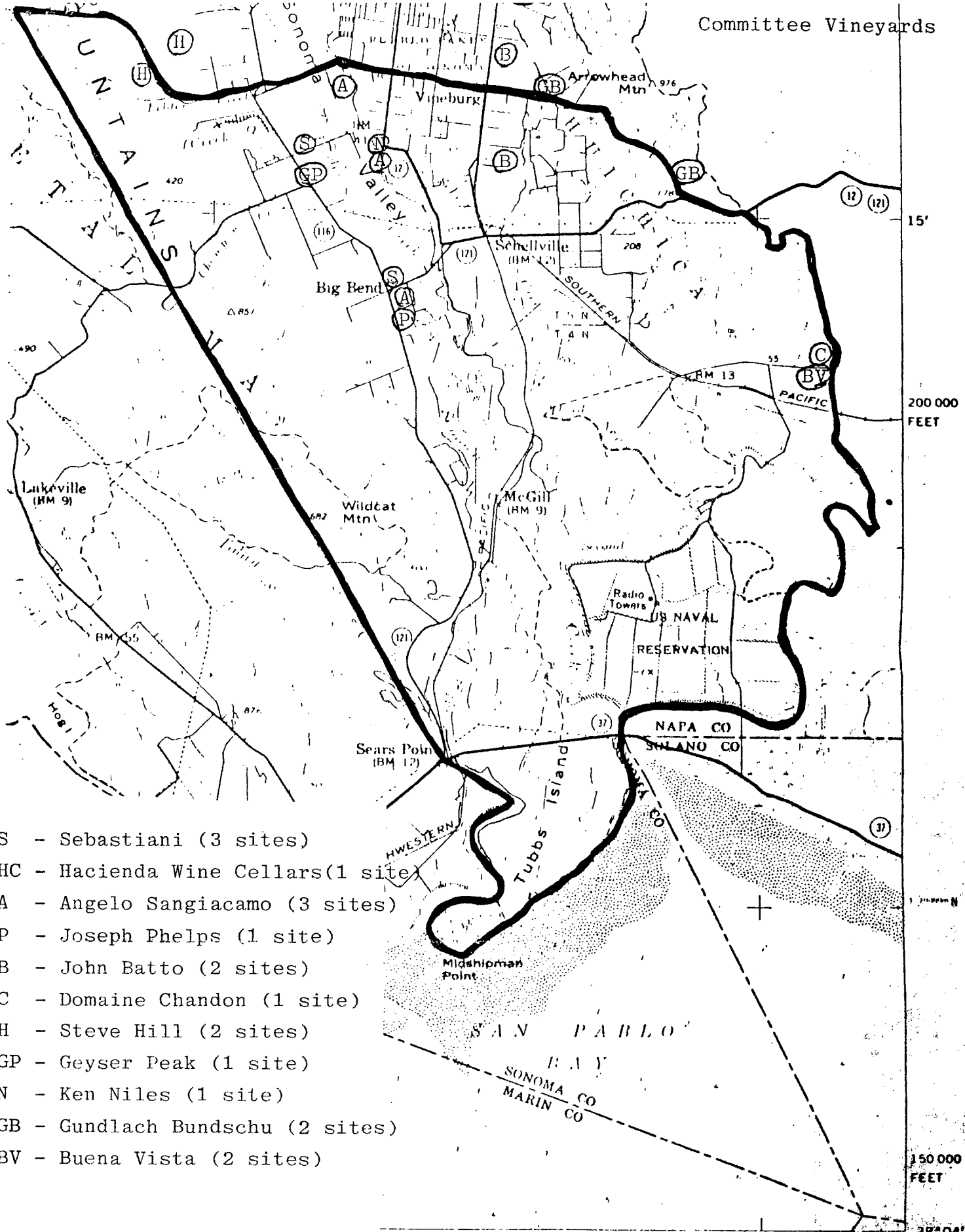
We have been selling grapes to Domaine Chandon since 1974. Our grape harvest dates to them have consistently been the same as that of Mr. Rene DiRosa, whose vineyard is located along Los Carneros Creek.

We fully support the proposal of the Ad Hoc Sonoma Valley Carneros Group as being an accurate description of the Los Carneros Viticultural area in Sonoma County as indicated by copies of their maps which I am enclosing.

Yours very truly,

  
Angelo C. Sangiacomo

ACS:hk  
Enc.

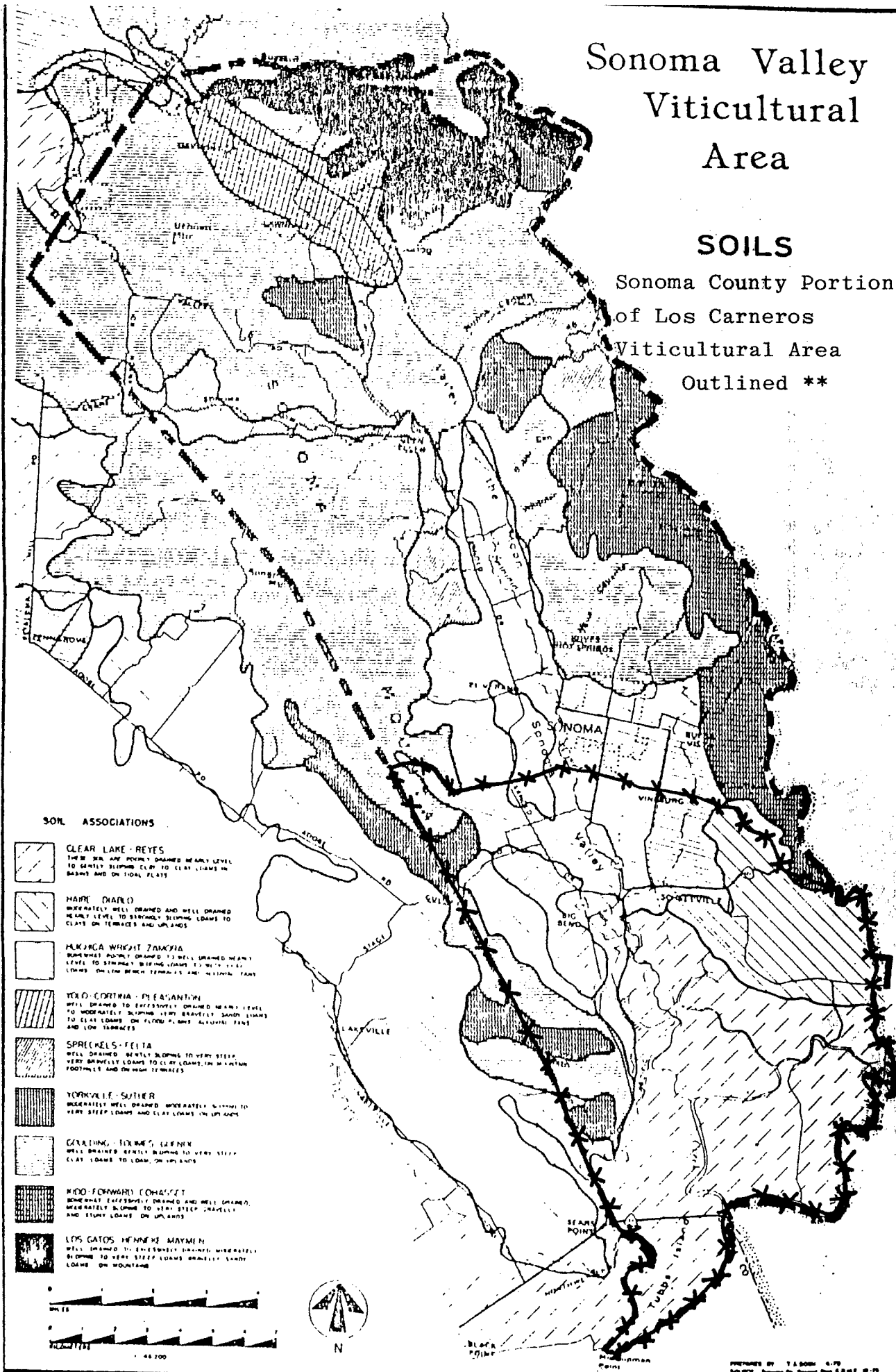


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# Sonoma Valley Viticultural Area

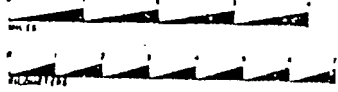
## SOILS

Sonoma County Portion  
of Los Carneros  
Viticultural Area  
Outlined \*\*



### SOIL ASSOCIATIONS

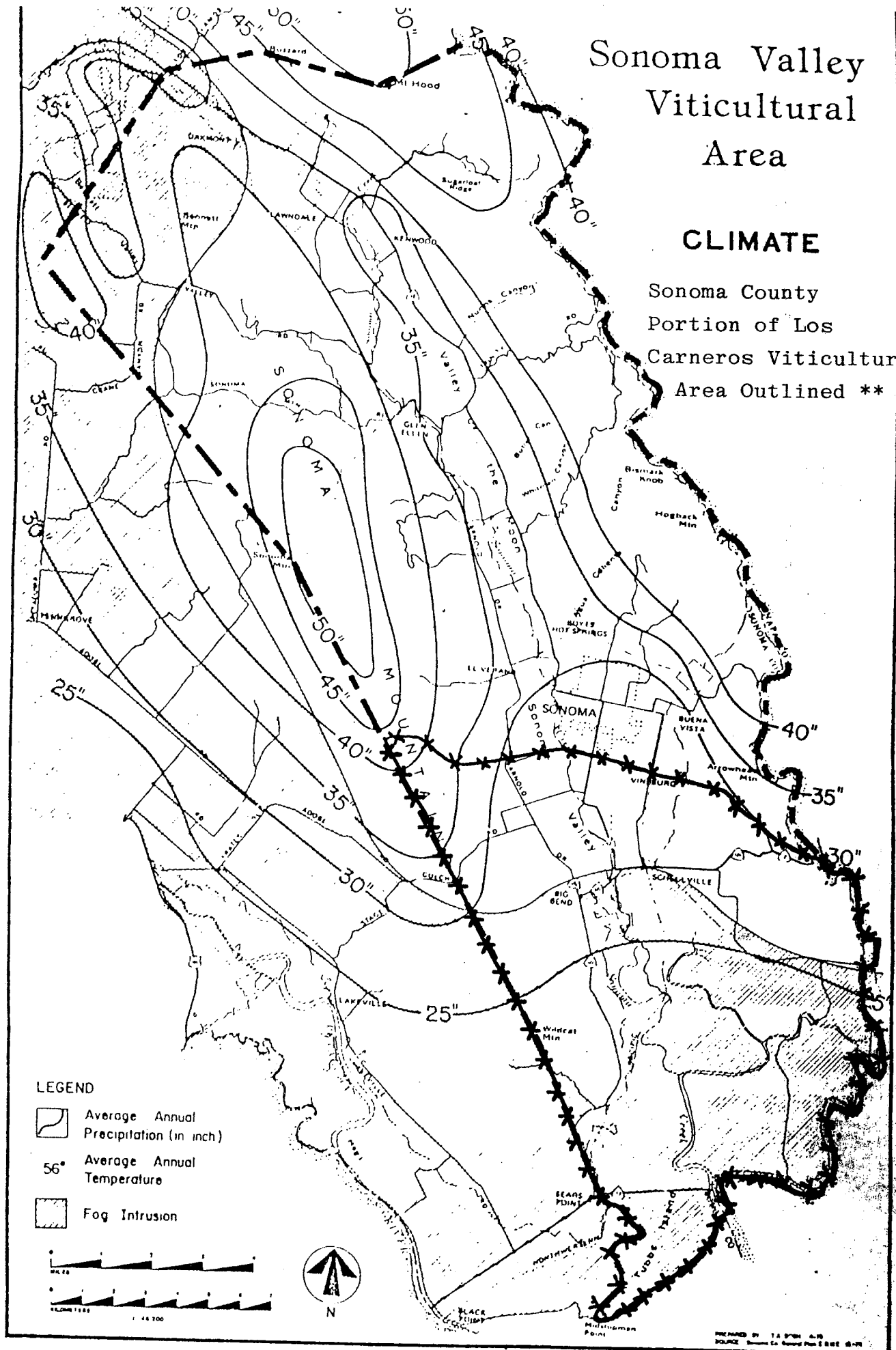
- 
**CLEAR LAKE - REYES**  
 TO BE SEEN AT POINTS DRAINING NEARLY LEVEL TO GENTLY SLOPING CLAY TO CLAY LOAMS IN BAYS AND ON TIDAL FLATS
- 
**HAIRY DWARF**  
 MODERATELY WELL DRAINER AND WELL DRAINER NEARLY LEVEL TO STRONGLY SLOPING LOAMS TO CLAYS ON TERRACES AND UPLANDS
- 
**MUKJIGA WHEAT ZAKRIA**  
 MODERATELY WELL DRAINER TO WELL DRAINER NEARLY LEVEL TO STRONGLY SLOPING LOAMS TO CLAY LOAMS ON LOW BRUSH TERRACES AND UPLANDS
- 
**YEAO-CORTINA - PLEASANTON**  
 WELL DRAINER TO EXCESSIVELY DRAINER NEARLY LEVEL TO MODERATELY SLOPING VERY BRAVELY SANDY SLIMS TO CLAY LOAMS ON FLOOD PLAINS ALLUVIAL FANS AND LOW TERRACES
- 
**SPRECKELS - FELTA**  
 WELL DRAINER, GENTLY SLOPING TO VERY STEEP, VERY BRAVELY LOAMS TO CLAY LOAMS ON MOUNTAIN FOOTHILLS AND ON HIGH TERRACES
- 
**YORKVILLE - SUTHER**  
 MODERATELY WELL DRAINER MODERATELY SLOPING TO VERY STEEP LOAMS AND CLAY LOAMS ON UPLANDS
- 
**GEARDING - TOWN'S GREENY**  
 WELL DRAINER GENTLY SLOPING TO VERY STEEP CLAY LOAMS TO LOAM ON UPLANDS
- 
**KOD-FORWARD (CHASSET)**  
 MODERATELY EXCESSIVELY DRAINER AND WELL DRAINER, MODERATELY SLOPING TO VERY STEEP, GRAVELLY AND STONY LOAMS ON UPLANDS
- 
**LOS GATOS HENNE MAYMEN**  
 WELL DRAINER TO EXCESSIVELY DRAINER MODERATELY SLOPING TO VERY STEEP LOAMS BRAVELY SANDY LOAMS ON MOUNTAINS



# Sonoma Valley Viticultural Area

## CLIMATE

Sonoma County  
Portion of Los  
Carneros Viticultural  
Area Outlined \*\*



### LEGEND

- Average Annual Precipitation (in inch)
- 56° Average Annual Temperature
- Fog Intrusion



# E. A. DURELL & CO., Inc.

576 Sacramento Street, San Francisco, California 94111 • Telephone: (Area Code 415) 398-4141 • Telex No. 34-0574

July 28, 1982

Mr. Steven E. Higgins  
Acting Director  
Bureau of Alcohol, Tobacco & Firearms  
P.O. Box 385  
Washington, D.C. 20044-0385

Attention: Notice #412

Dear Mr. Higgins:

I am a grower in the lower Sonoma Valley. My family has been in farming in this area for the past four years. We are very concerned that the Los Carneros Viticultural area be accurately described for ourselves and for our heirs.

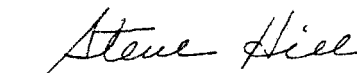
We fully support the proposal of the Ad Hoc Sonoma Valley Carneros Group as being an accurate description of the Los Carneros Viticultural area in Sonoma County. If the Bureau wishes to change the boundary suggested by the Ad Hoc Committee, we would hope that a public hearing in the area would be held to air other points of view.

Our vineyards are located both inside and outside the proposed district. We feel that the description given by the Ad Hoc Sonoma Valley Carneros Group is accurate based on the historical and geographical guidelines given by the Bureau.

Our vineyard lying within the proposed boundary is cooler during the day by as much as 5° while warmer at night by 3-4°. It also has significantly more afternoon wind. These two areas are no more than 1/2 mile apart. The differences we feel are due to a marine influence.

We have no problem at all with the concept of the Los Carneros Viticultural District overlapping Sonoma and Napa Counties. In fact, we support the concept of overlap because it accurately describes the area at the northern end of San Pablo Bay. The grapes in the Los Carneros District are distinctive and unique. The overlapping district gives an accurate description of the way the land lies and the quality of the grapes grown in the area.

Very truly yours,



Steve Hill, Grower

Durell Ranch  
1945 Felder Rd.  
Sonoma, CA 95476

Jim Yamakawa  
300 West Watmaugh Rd.  
Sonoma, CA 95476

July 28, 1982

Mr. Steven E. Higgins, Acting Director  
Bureau of Alcohol, Tobacco and Firearms  
P. O. Box 385  
Washington, D. C. 20044-0385

Attention: Notice No. 412

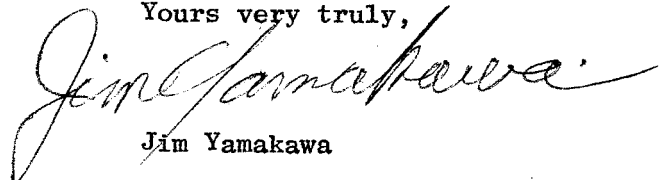
Dear Mr. Higgins:

I am a grape grower in the lower Sonoma Valley and have lived at 300 West Watmaugh Road for 32 years. I have raised pears, prunes and grapes and presently have 30 acres of grapes.

My uncle, Joe Hamamoto, has a pear and apple ranch on Los Carneros Ave. and Napa Highway. I harvested his pears for several years and our harvest dates were always identical. There are also grapes nearby his ranch and our harvest dates by variety coincide. There is no doubt that the climate and soils of my area are the same as the Hamamoto ranch. My grapes also are low-yielding per acre, which is characteristic of the Los Carneros District.

I have reviewed the proposed Los Carneros Viticultural Area of the Southern Sonoma Valley Ad Hoc Committee and support their proposal and feel it is an accurate description of the Los Carneros Viticultural area in Sonoma County.

Yours very truly,

  
Jim Yamakawa

JY:hk



CHATEAU BOUCHAINE  
1075 BUCHLI STATION ROAD  
NAPA, CALIFORNIA 94558  
(707) 252-9065

R: P -

July 28, 1982

Mr. William T. Drake, Jr.  
BATF Treasury Department  
1200 PENNA. Avenue N.W.  
Washington, D.C. 20226

Dear Mr. Drake:

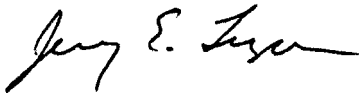
This letter is a follow-up to my communication to Mr. Steve Simon on July 20, 1982. Since I have recently learned of your important role in the appellation hearing process, may I please call your attention to that letter.

There are vital grape growing and wine marketing concerns hanging on your decision. We at Bouchaine urge you to consider carefully the impact of a separate and distinct "Los Carneros" which by its present interpretation crosses both county lines and different climatic and geographical boundaries.

Bouchaine is a reborn old winery with a potential premium "Carneros-Napa Valley" production of 50,000 cases. We are the largest winery in the Carneros-Napa region and hope to play a key role in the development of the appellation.

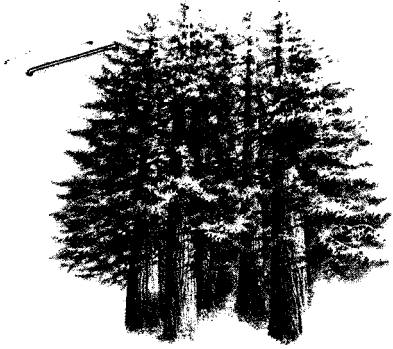
I thank you for your time and consideration.

Respectfully submitted,



Jerry E. Luper  
Partner, Winery General Manager

WFO (M)  
R4P D: 0



# SEQUOIA GROVE

V I N E Y A R D S <sup>PM</sup> 8/2

8338 St. Helena Highway Napa, California 94558  
707/944-2945

7/28/82

William T. Drake, Jr.  
BAFT Treasury Dept.  
1200 Penna. Ave. N.W.  
D.C. 20226

Dear Mr. Drake:

I am writing to express my support for a Los Carneros Apellation that would also maintain a Napa Valley Apellation. Both elements are important to the precise marketing of our wines.

I would also like to reccommend that the Southern Limit of the Los Carneros Region be the Southern Pacific Railroad tracks. The area south of the railroad tracks to the proposed southern limit, the Solano County Line' includes land that is not adaquate for quality grape production and could affect the overall quality of the wine produced in this area. This is a great concern, please give it your consideration.

Sincerely Yours,

James W. Allen, Winemaker

# THE CALIFORNIA WINE COMPANY

July 28, 1982

Chief, Regulation and Procedures Division  
Bureau of Alcohol, Tobacco and Firearms  
P.O. Box 385  
Washington, D. C. 20044-0385

Notice #412

Dear Sir,

The Los Carneros Viticultural area as proposed in Notice 412, rennotice 360 published in the Federal Register, Volume 47, Number 108/Friday, June 4, 1982 is not in compliance with 27 CFR 4.25 a(e) (2). Further, the proposed boundary for the area may be in violation of both the Regulatory Flexibility Act (5 USC Chapter 6) and Executive Order 12291.

1. Section 4.25 a (e) (2) CFR 27 states specific requirements for a petition to establish a grape growing region as a viticultural area. At the Public Hearing held by BATF at Santa Rosa, California 14 January, 1981, substantial testimony was given regarding the Los Carneros Viticultural Area. Subsequently, BATF has modified the original petition filed regarding the Los Carneros Viticultural Area. Unfortunately, even as modified, the new boundaries are still inadequate with regards to CFR 27 4.25 a (e) (2), specifically parts a, b and c of this regulation. Further, Industry Circular Number 80-15 specifically states "A viticultural area should be based on geographic features which distinguish the growing conditions of the area. There is no maximum or minimum size for a viticultural area. However, the entire area should possess a viticultural feature which distinguishes it from surrounding areas."

The proposed boundaries in no way possess any feature which "distinguishes it from surrounding areas." The unilateral decision to use Highway 121 and Sonoma Creek as boundaries for that portion of Los Carneros in Sonoma Valley constitutes an error which must be corrected. There are absolutely no distinguishing features to support those boundaries.

2. With regard to the Regulatory flexibility, the proposed regulation would have significant economic impact on a substantial number of small entities. Some growers immediately adjacent to the proposed area would be severely impacted. Some growers currently having long term contracts for the sale of their grapes have received in the past payment based on their location within the Los Carneros area. The proposed regulation could exclude them from receiving this payment in the future. Several wineries which have obligations to purchase grapes in this area would also be adversely affected.

July 28, 1982

3. With regard to Executive Order 12291, the proposed boundary would have significant adverse effects on competition and on the investment of small businesses in the area.

As the principal author of the accepted Sonoma Valley Viticultural Area petition, as a vintner with over 12 years of actual experience in Southern Sonoma Valley, and as a resident of both Southern Napa Valley and Southern Sonoma Valley for over 25 years, I am quite familiar with this entire region. The Southern Sonoma Valley Ad Hoc committees proposal for the Los Carneros Viticultural area would be in compliance with 27 CFR 4.25 a(e) (2). The Regulatory Flexibility Act and Executive Order 12291 would also be satisfied by this new proposal.

These new proposed boundaries would distinguish the Sonoma Valley portion of Los Carneros from the surrounding area, particularly in terms of climate and soil, the critical factors in terms of viticulture. While I have no desire to dwell upon the Napa Valley portion of Los Carneros, the geographic features affecting conditions are far less consistent. It is unfortunate that BATF has not officially observed this area first hand.

Growers and vintners adjacent to, and with interests on both sides of our new proposed boundary also are satisfied. To our knowledge, no entities would be adversely affected if these new boundaries were accepted. Existing contracts would not be affected. We believe we are proposing a solution that would end the controversy that has existed and be fair to all wineries, growers and ultimately, wine consumers.

We appreciate the continuing understanding on the part of the Bureau in this matter and we hope that the Southern Sonoma Valley Ad Hoc Committee's proposal will be accepted without change. Thank you for your consideration.

Sincerely,

John B. Merritt, Jr.  
General Manager

Attachment: Southern Sonoma Valley  
Ad Hoc Committee Proposal

SOUTHERN SONOMA VALLEY AD HOC COMMITTEE  
COMMENT ON LOS CARNEROS VITICULTURAL AREA

TO:

Mr. Stephen E. Higgins  
Acting Director  
c/o Chief Regulations & Procedures Division  
Bureau of Alcohol, Tobacco & Firearms  
P. O. Box 385  
Washington, D.C. 20044-0385 (Notice No. 412)

FROM:

Jim Carter, Chairman  
Southern Sonoma Valley Ad Hoc Committee  
c/o Sebastiani Vineyards  
P. O. Box AA  
Sonoma, CA 95476

Dear Mr. Higgins:

An interested group of grape growers and wineries in Southern Sonoma Valley would like to comment on Notice No. 412, the Los Carneros Viticultural Area. The comment of this group follows:

I. Composition of the Southern Sonoma Valley Ad Hoc Committee

The following individuals comprise the committee:

Jim Carter, Chairman (Sebastiani Vineyards)  
Crawford Cooley (Hacienda Wine Cellars)  
John Merritt (Arroyo Sonoma Winery)  
Angelo Sangiacamo (Grower)  
Joseph Phelps (Joseph Phelps Vineyards)  
John Batto (Grower and President North Coast Counties  
Grape Growers)  
Will Nord (Domaine Chandon)  
Steve Hill (Grower)  
Jean-Marie Martin (Geysler Peak Winery)  
Ken Niles (Grower)  
Jim Bundschu (Gundlach-Bundschu Winery)  
Hubertus von Wulffen (Buena Vista Winery)

Enclosed you will find a map locating the vineyards controlled or owned by the members of the committee. As you can see, the members of the committee are intimately involved and eminently qualified to comment on lands in the Southern Sonoma Valley.

II. Scope of our Comment

The committee will limit its comments to the Sonoma County portion of the proposed Los Carneros Viticultural Area. Individual members may expand their comments to include Napa County.

### III. Overlap

The committee sees no problem with the Los Carneros Viticultural Region overlapping and being a sub-region of the already defined Sonoma Valley and Napa Valley Viticultural Regions. In fact, the committee finds that an overlap is the only accurate and truthful way to define the southern end of the Sonoma and Napa Valleys in a viticultural sense. The committee does not believe that such an overlap will cause any consumer confusion.

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The committee feels that Notice No. 412 gives sufficient historical evidence that Los Carneros is a name commonly applied to the lower Sonoma and Napa Valleys.

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#### a. Topography

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Haire-Coombs soils dominate the grape growing areas in the Los Carneros, though in both counties several other soil types exist. A soils map of the Sonoma County portion is attached.

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IX. Summary

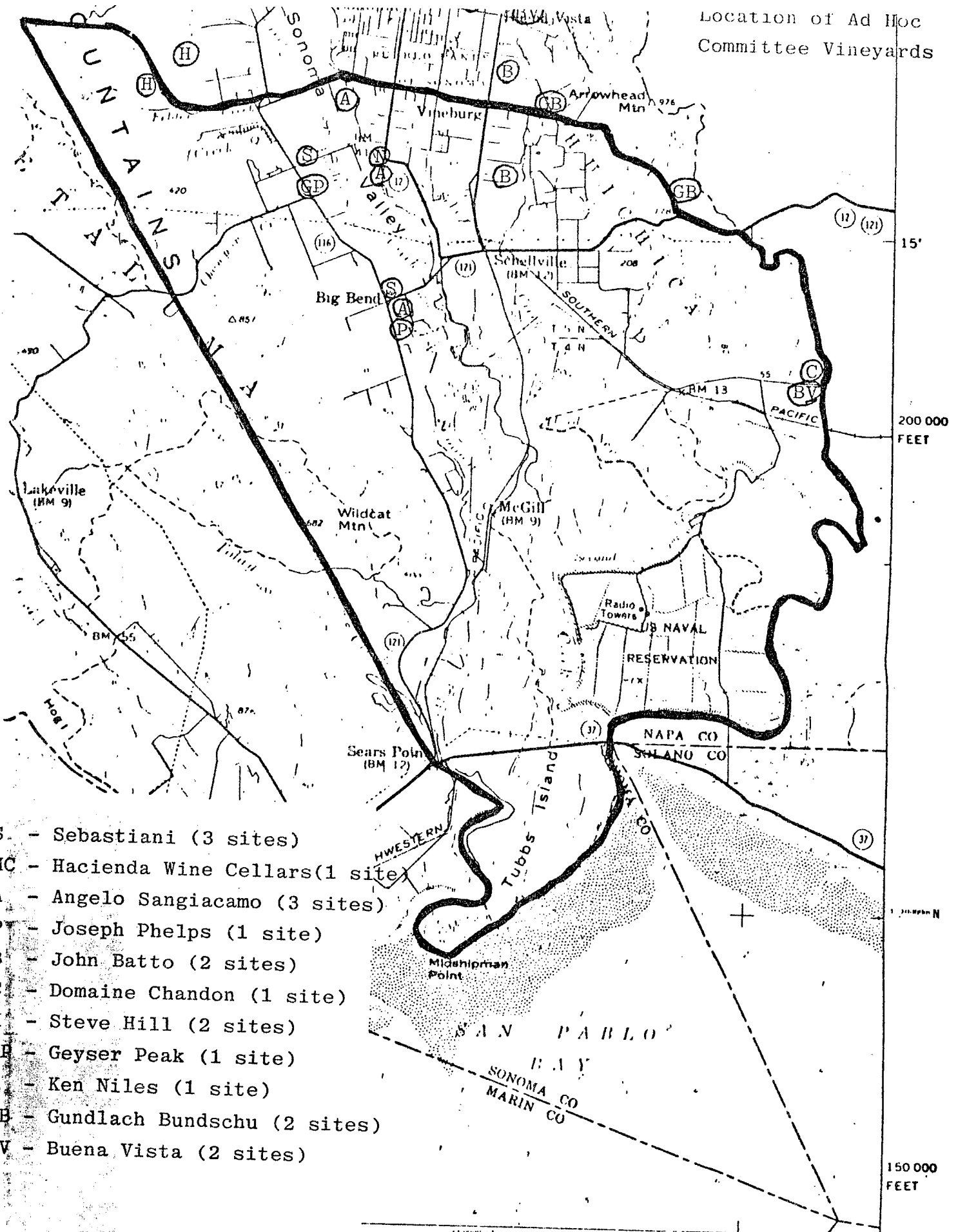
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We hope that our testimony, coupled with that of the Napa County growers and vintners, will provide the needed information to the Bureau to Accurately define the Los Carneros Viticultural Area.



Location of Ad Hoc  
Committee Vineyards



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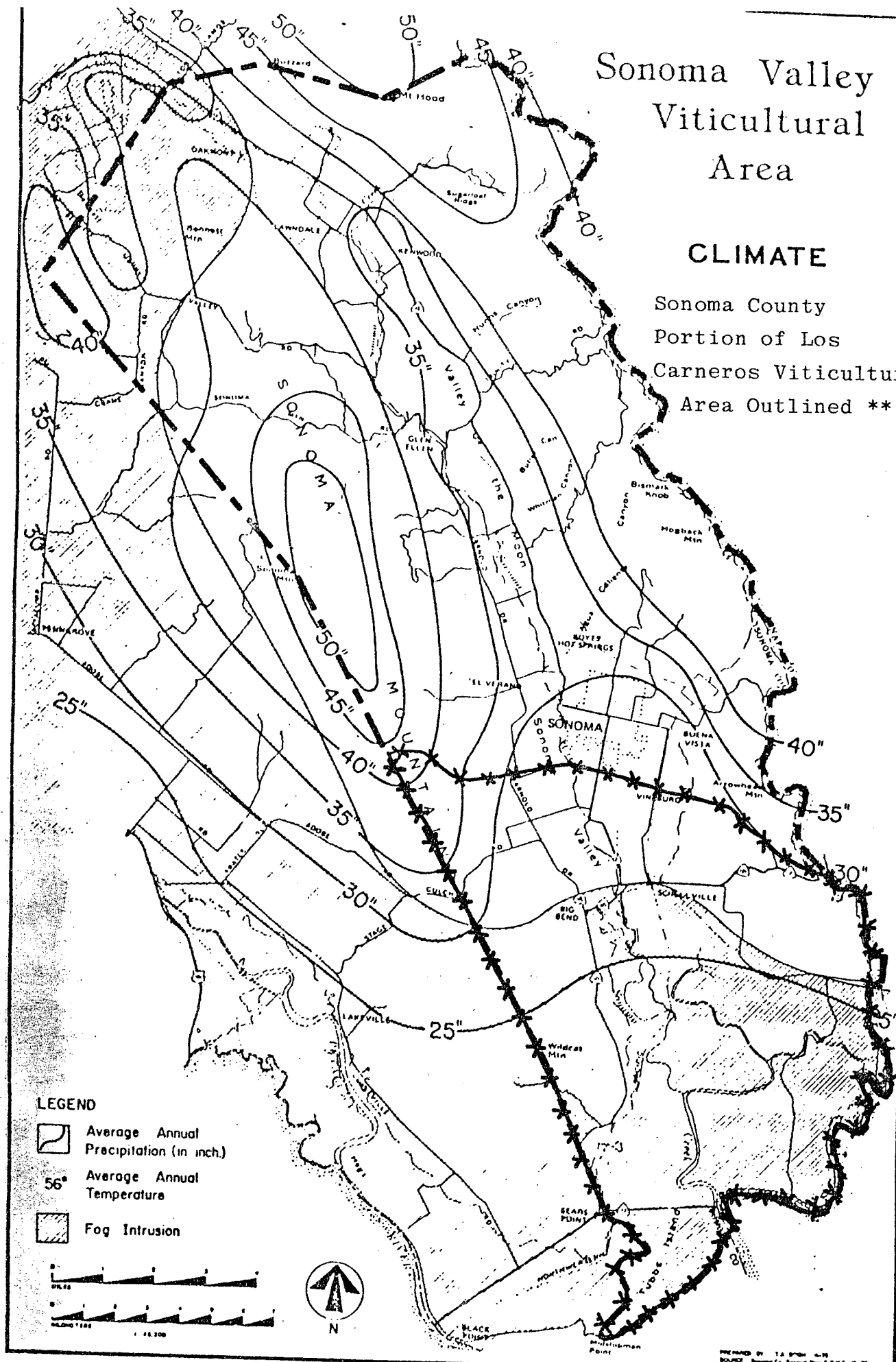
200 000  
FEET

150 000  
FEET

# Sonoma Valley Viticultural Area

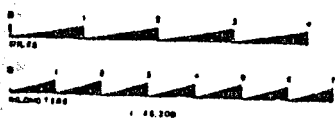
## CLIMATE

Sonoma County  
Portion of Los  
Carneros Viticultural  
Area Outlined \*\*



**LEGEND**

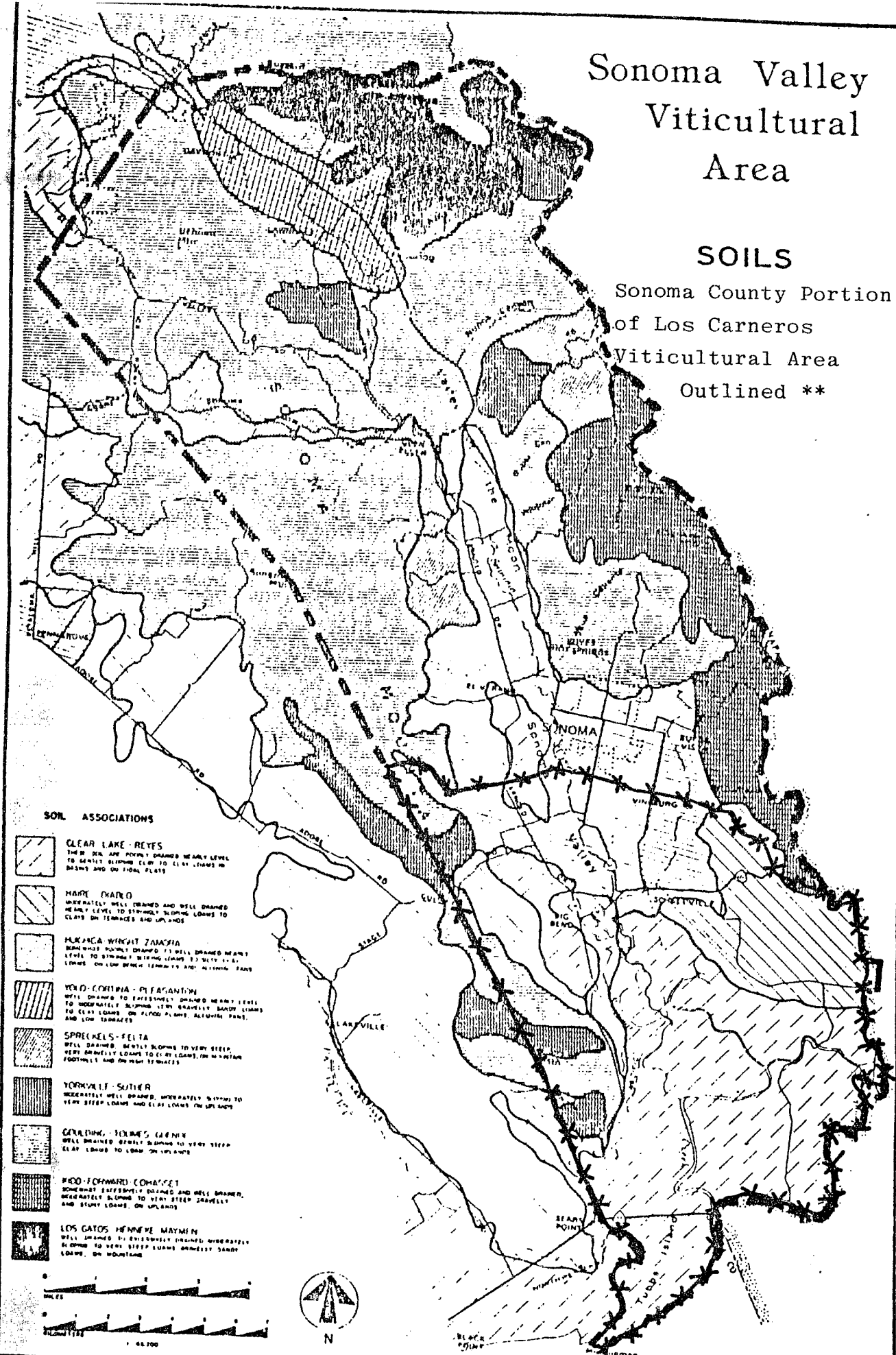
- Average Annual Precipitation (in inch.)
- 56° Average Annual Temperature
- Fog Intrusion












# Sonoma Valley Viticultural Area

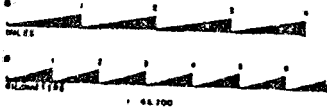
## SOILS

Sonoma County Portion  
of Los Carneros  
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Outlined \*\*



### SOIL ASSOCIATIONS

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- 
**MARE DIABLO**  
 MODERATELY WELL DRAINED AND WELL DRAINED NEARLY LEVEL TO MODERATELY SLOPING LOAMS TO CLAYS ON TERRACES AND UPLANDS
- 
**MURCA WIGHT ZIAFIA**  
 SOMEWHAT POORLY DRAINED TO WELL DRAINED NEARLY LEVEL TO MODERATELY SLOPING LOAMS TO SILTY CLAY LOAMS ON LOW BENCH TERRACES AND ALLUVIAL FANS
- 
**YOLO-COVINA-PEZANIN**  
 WELL DRAINED TO EXCESSIVELY DRAINED NEARLY LEVEL TO MODERATELY SLOPING VERY HEAVILY SANDY LOAMS TO CLAY LOAMS ON FLOOD PLAINS ALLUVIAL FANS, AND LOW TERRACES
- 
**SPRECKELS-FELTA**  
 WELL DRAINED, MODERATELY SLOPING TO VERY STEEP, VERY HEAVILY LOAMS TO CLAY LOAMS, ON MOUNTAIN FOOTHILLS AND ON WEST TERRACES
- 
**YORKVILLE-SUTLER**  
 MODERATELY WELL DRAINED, MODERATELY SLOPING TO VERY STEEP LOAMS AND CLAY LOAMS ON UPLANDS
- 
**GERDING-TOWN'S GARDEN**  
 WELL DRAINED EXCESSIVELY DRAINED TO VERY STEEP CLAY LOAMS TO LOAM ON UPLANDS
- 
**RIO-CHICOARD COMACET**  
 SOMEWHAT EXCESSIVELY DRAINED AND WELL DRAINED, MODERATELY SLOPING TO VERY STEEP SANDY AND STONY LOAMS, ON UPLANDS
- 
**LOS GATOS-HENRYE MAYMEN**  
 WELL DRAINED TO EXCESSIVELY DRAINED, MODERATELY SLOPING TO VERY STEEP SANDY HEAVILY SANDY LOAMS, ON MOUNTAINS



PREPARED BY T. A. BOWEN, CIVIL ENGINEER  
 SOURCE: Sonoma Co. Soil Survey, 1934

Mr. Steven E. Higgins  
Acting Director  
BATF

Dear Mr. Higgins,

I am writing because of my concern for your decision at ATF regarding Los Carneros Viticultural area.

I am the owner of a small winery at the southern end of Sonoma Valley. It is of considerable importance to me how this area may come to be defined. My winery, Ricahrdson Vineyards (vineyards to be planted soon) is in Schellville, one block north of hiway 121. Certainly I am located in Sonoma Valley, but viticulturally the characteristics I have observed would more accurately include this section in the Carneros region, along with the southern edges of Napa county.

In my doay-to-day life I frequently travel into town (Sonoma) to take the children to school, to shop for needs, or to attend to business (bank, post office, etc.). The difference in climate between my home and the town is striking and consistent. It is not unusual to note 10 or more degrees difference in temperature, and also the air movement as cool ocean air blows through Petaluma gap cooling the southern end of the valley dramatically. Yet if I continue east to Napa through the southern end the climate seems quite similar until I turn north up into the shelter of the valley.

I feel that the soils, climate, and grape quality (sugar/acid picking dates, etc.) are very similar in these southern ends of the two valleys, and feel strongly that both areas should be included in the Carneros designation despite the fact that this area would overlap the Napa Valley and Sonoma Valley areas already established.

Drawing actual boundaries is always a difficult task. Undoubtedly there must be some arbitrary decisions with boundaries, and some with which certain individuals will disagree.

But to maximize the fairness of your boundaries, I strongly urge that as much as possible you follow the recomendation of the Ad Hoc Sonoma Valley Carneros Group. I personally know and respect most of its members as being knowledgeable persons of considerable expertise. I have full faith in their abilities to counsel you wisely and fairly in the matter of establishing this important viticultural area.

Sincerely,

  
Dennis Richardson

Richardson Vineyards

Bm

# CARNEROS HILL VINEYARD

7/29/82

William T. Drake, Jr.  
BAFT Treasury Dept.  
1200 Penna. Ave N.W.  
DC 20226

Dear Mr. Drake:

I feel it is to the best interest of all concerned that the label for all wines produced in the Los Carneros area read: Los Carneros, Napa Valley. We are duly concerned that the representation of the California wines be as accurate as possible.

It is also my concern that the land area of Los Carneros be conducive to the growing of quality grapes. It is my opinion that the Southern Limit to the Carneros area be the Southern Pacific Railroad tracks. The Solano County line as the southern limit includes marshy, salty land not conducive to quality grape production, and threatens the quality of wine production.

Sincerely Yours,

*Stephan L. Allen*

*Stephan L. Allen*  
Stephan L. Allen, Vineyard Manager

R & F -

Robert Lee Hudson  
1310 Hestia Way  
Napa, California 94558

July 29, 1982

William T. Drake, Jr.  
BATF Treasury Dept.  
1200 Penna. Ave. N.W.  
D.C. 20226

In Reference To: LOS CARNEROS APPELATION, NAPA VALLEY, CALIFORNIA

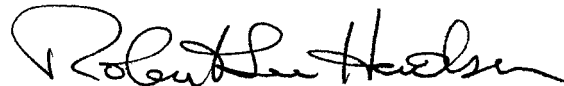
Dear Mr. Drake:

I am a grape grower in the Napa Valley Los Carneros region. As my vineyard is located in the Napa Valley, I feel it is important to designate Napa Valley as part of any appellation which concerns this region.

I would like to express my interest and concern that the Los Carneros Appellation be correctly stated firstly, as Napa Valley; and secondly, as Los Carneros.

I would greatly appreciate receiving notice of the decision made in regards to this appellation.

Sincerely yours,



Robert Lee Hudson  
Rancho Huichica  
Los Carneros, Napa Valley

# Geyser Peak Winery



John C. Senkevich  
VICE PRESIDENT & GENERAL MANAGER

July 29, 1982

Mr. Steven E. Higgins  
Acting Director  
Bureau of Alcohol, Tobacco & Firearms  
P. O. Box 385  
Washington, D. C. 20044-0385

Regarding: NOTICE 412

Dear Mr. Higgins:

Geyser Peak Winery of Sonoma County owns and operates a vineyard in the southern part of Sonoma County near the town of Schellville. The Fowler and Rogers Creeks flow through the property before it joins the Sonoma Creek. We have owned and operated this property since 1973. This 200 acres was purchased to raise wine grapes of a distinctive quality due to the soils and climate of the area which is descriptive of the Los Carneros Region.

Geyser Peak Winery is concerned about Notice 412 concerning the Los Carneros viticultural area, that it does not truly represent a complete viticultural area affected by soil conditions, topography and climate. We fully support the proposal of the Ad Hoc Sonoma Valley Carneros Group as being an accurate description of the Los Carneros viticultural area. If the Bureau wishes to change the boundaries suggested by the Ad Hoc Committee, we would hope that a public hearing in the area would be held to reflect our points of view.

Our vineyards are located inside the proposed district. We believe that the description given by the Ad Hoc Sonoma Valley Carneros Group is accurate based on the historical and geographical guidelines given by the Bureau.

Saintsbury  
3222 Ehlers Lane  
St. Helena, CA. 94574

Mr. Steven E. Higgins  
Acting Director  
Bureau of Alcohol, Tobacco and Firearms  
P.O. Box 385  
Washington, D.C. 20044-0385

July 29, 1982

Attention : Notice #412

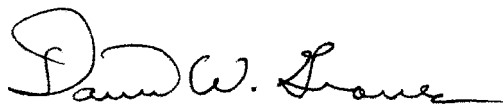
Dear Mr. Higgins:

We are winemakers in the Napa Valley. Saintsbury produces Pinot Noir and Chardonnay from grapes grown in the coolest viticultural areas of Napa and Sonoma Counties. We have purchased grapes from the Carneros in Napa County, and from several vineyards within the boundaries proposed by the Southern Sonoma Valley Ad Hoc Committee in their comment on the proposed Los Carneros Viticultural Area.

In our view, the grapes from the sites in the Sonoma Valley portion of the Carneros show the same desirable traits that Napa Carneros grapes do: good acid levels, low pH and true intense varietal character. Harvest dates for the predominant varieties Chardonnay and Pinot Noir in the Napa and Sonoma portions of the Region are nearly identical due to similar soils, temperatures and exposures. Yields are low throughout the Region, when compared with other warmer, more fertile areas of the North Coast.

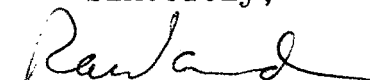
The environmental factors that govern the style of the grapes grown in the Napa Carneros - primarily the cooling influence of San Pablo Bay - also prevail in the Sonoma portion of the Region, as outlined by the Southern Sonoma Valley Ad Hoc Committee. The mere existence of a political boundary (the county line) should not stand in the way of the recognition of a unique and valuable agricultural resource in its entirety - the Los Carneros Viticultural Area of Napa and Sonoma Counties.

We strongly support the boundaries proposed for the Los Carneros Viticultural Area by the Southern Sonoma Valley Ad Hoc Committee.



David W. Graves

Sincerely,



Richard A. Ward



# WINERY LAKE

5200 SONOMA HIGHWAY NAPA

CALIFORNIA 94558

AREA CODE 707  
226-5991

*Handwritten:*  
Pan  
8-3-82

July 30, 1982

Mr. William Drake, Jr.  
1200 Penna. Ave. N. W.  
Washington 20226

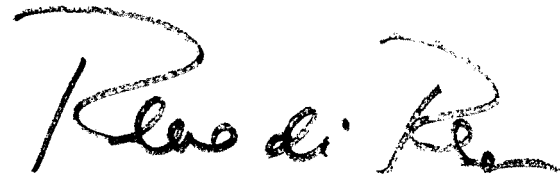
Dear Mr. Davis;

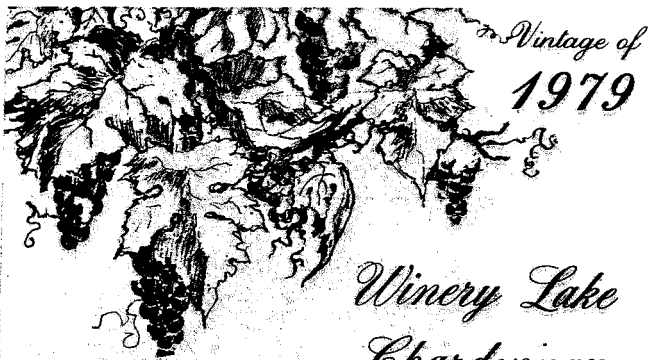
More label evidence (attached) to support a Carneros designation within the Napa Valley.

Incidentally, a professor of viticulture at the University of California, Davis, tells me that a male library person there is just wild against appellations, including Carneros. Apparently, he has been contacted by a lady in your department who may not be aware of his decided bias in this particular matter.

Anyway, thank you for your interest in making this decision a sound one.

Regards,





Vintage of  
1979

Winery Lake  
Chardonnay  
of California

Produced and bottled from grapes grown  
in Winery Lake Vineyard, Carneros,  
Napa County by

*La Crema Vinera*

P.O. Box 976 - Petaluma, Calif. 94953  
Alcohol 12.5% by Volume

TO THE LEFT IS ANOTHER EXAMPLE OF  
A SONOMA (PETALUMA) WINERY USING  
BOTH A CARNEROS AND A NAPA AREA  
DESIGNATION.

(SOME LABELS JUST REFUSED TO PEEL  
OFF, OR I WOULD HAVE SENT ALONG  
SOME ELEVEN OF THEM FROM WINERIES  
CURRENTLY USING LOS CARNEROS AS A  
SUB DESIGNATION WITHIN THE NAPA  
VALLEY, AND HERE I AM SPEAKING ONLY  
OF MY OWN WINERLY LAKE VINEYARD, AS  
THE SOURCE OF SUCH EXACTITUDE.)

*Reverend R. R.*

HAGA



1980 NAPA VALLEY 5741  
JOHANNISBERG  
RIESLING

WINERY LAKE VINEYARD

PRODUCED & BOTTLED BY HAGAFEN CELLARS  
NAPA, CALIF. • ALCOHOL 11.5% BY VOLUME

**KOSHER FOR PASSOVER**

Produced in the 1980  
premium dry wine can  
enjoyed at holiday celebrations as  
as all other occasions.

Our 1980 Johannisberg Riesling be-  
gan in the well-known Winery Lake  
Vineyard of the Carneros district of Napa  
Valley. Harvested at 23° Brix, these  
grapes were immediately crushed and  
cold fermented to capture the delicate  
fragrant character of this noble variety.  
This wine is 100% varietal with 2.0%  
residual sugar by weight and 0.8% total  
acidity by volume. Please serve chilled.

HAGAFEN CELLARS, P. O. BOX 3035  
NAPA, CALIFORNIA 94558

אנו מאשרים שהיינו ינהגנו ברישיון  
של מרתה הכפר נעשה בהשגחה תדיריה  
רכשר הוא לפסח וכל השנה.  
הרב יעקב חיים טרייב  
ירושלם ראש

THIS IS TO CERTIFY THAT HAGAFEN CELLARS  
JOHANNISBERG RIESLING WINE, 1980/5741  
VINTAGE HAS BEEN PRODUCED UNDER OUR  
SUPERVISION, AND IS KOSHER FOR ALL  
YEAR INCLUDING PASSOVER.

Rabbi Jacob Traub, Chairman  
Orthodox Rabbinical Council  
of San Francisco

כשר לפסח

1981

CARNEROS DISTRICT  
NAPA VALLEY

*Crewürstraminer*

# Veedercrest Vineyards



Pinot Noir

1972

Cask 606L

from Winery Lake Vineyards  
Carneros District, Napa County

Produced and Bottled by Veedercrest Vineyards  
Napa and Berkeley, California  
Alcohol 12.5 per cent by volume



DATING BACK EVEN BEFORE 1972,  
1973, WINERIES IN SONOMA AND  
BERKELEY WERE LABELING WINES AS  
CARNEROS AND NAPA.

THIS FORM OF IDENTIFYING A  
REGION WITHIN THE NAPA VALLEY  
CONTINUES TODAY WITH WINERIES  
IN SANTA CRUZ COUNTY, ETC .  
USING SUCH A LABEL..

*Rene di P...*



*Martin Ray*



# Domaine Chandon

30 July 1982

Mr. Stephen E. Higgins  
Acting Director  
c/o Chief, Regulations & Procedures Division  
Bureau of Alcohol, Tobacco & Firearms  
P. O. Box 385  
Washington, D.C. 20044-0385

Dear Mr. Higgins:

On behalf of Domaine Chandon, we wish to affirm the position adopted by a group of Sonoma Valley grapegrowers with regard to the delineation of the "Carneros" appellation area. This proposed area is covered by your Notice #412, and the comment period closes August 3.

Domaine Chandon has bought grapes from the Sonoma County side of the (unofficial) Carneros district since 1975 because of the desirable qualities of Pinot Noir and Chardonnay grown in this microclimate for sparkling wine production. We have found that these varieties, from the Napa side or the Sonoma side of the county line (which bisects the traditional Carneros area) are very similar in quality and in ripening time.

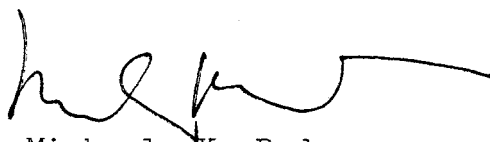
For these reasons, we support the desire of the Sonoma growers to have the Carneros appellation overlap the Sonoma Valley appellation already established. In addition, of course, we suggest that the Napa side of Carneros be included in the new Carneros designation (which would mean that the Napa Valley appellation is also overlapped by such a Carneros appellation). We see no conflict or potential for confusion in such an overlapping appellation.

Should a public hearing be called, we would be pleased to furnish testimony on this subject should clarification be desired.

Sincerely,



Wilmer G. Nord  
Vice President  
Viticultural Operations



Michaela K. Rodeno  
Vice President  
Marketing & Communications

William T. Drake, Jr.  
BATF Treasury Dept.  
1200 Penna. Ave. N.W.  
D.C. 20226

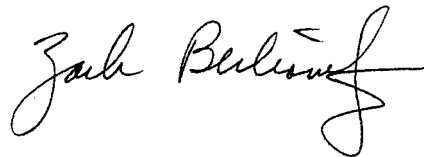
Dear Mr. Drake,

Aug. 1, 1982

I am writing this letter to inform you of my opinion regarding the Los Carneros Appellation. I am a vineyard owner in the Carneros district of Napa Valley and manage the Carneros vineyards of a large Napa Valley winery. In addition I have produced wines from Carneros grapes.

I would like to see Los Carneros as a subappellation of Napa Valley. Historically this is the fact and in practice this is the fact. I am aware of no wine labeled "Carneros Pinot Noir." There are many examples of "Napa Valley Pinot Noir, Carneros District." I am certain that you are aware that the approved Napa Valley appellation includes much of what is accepted as "Los Carneros." If interested parties in Sonoma Valley want a Carneros subappellation, I would certainly support their actions. A Carneros appellation without mention of Napa Valley or Sonoma Valley would be unpopular to both sides and would rob consumers of valuable information. Let's follow the existing concept of Napa Valley wine from the Carneros District.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jack Burtis". The signature is written in dark ink and is positioned below the typed name "Sincerely,".

R: F  
Rum  
8-9-82

Beckstoffer Vineyards

Post Office Box 329  
St. Helena, Napa Valley  
California 94574  
(707) 963-9471

W. ANDREW BECKSTOFFER  
President

August 2, 1982

Mr. William T. Drake, Jr.  
BATF Treasury Department  
1200 PENNA. Avenue. N.W.  
Washington, D.C. 20226

Dear Mr. Drake:

With regard to the Los Carneros appellation of origin, it seems to me important that the wine label read both "Los Carneros" and "Napa Valley."

As farmers of some 400 acres of vineyard in this Los Carneros region, we would like to appeal to you to so designate.

Sincerely,



W. Andrew Beckstoffer

WAB:bbs

RUTHERFORD AND RUTHERFORD

LAW OFFICES

1754 SECOND STREET, SUITE A

P. O. BOX 697

NAPA, CALIFORNIA 94558

707-226-3753

WALLACE RUTHERFORD 1898-1944

WESLEY RUTHERFORD 1931-1969

SHELDON RUTHERFORD

R. GREGORY RODENO

August 2, 1982

Stephen E. Higgins  
Acting Director  
c/o Chief Regulations & Procedures Division  
Bureau of Alcohol, Tobacco & Firearms  
P.O. Box 385  
Washington, DC 20044-0385

Re: Notice No. 412

Dear Mr. Higgins:

I am part of a group who owns a vineyard in the southern Sonoma Valley. On behalf of my partners and myself, I would like to comment on Notice 412, the Los Caneros Viticultural Area. While we are not a part of the southern Sonoma Valley Ad Hoc Committee headed by Jim Carter, I have received a copy of their comments.

I have reviewed their comments thoroughly, Notice 412, and the regulations under which the Notice was promulgated. I have had personal and professional involvement with several other proceedings to establish viticultural areas.

We believe that the evidence set forth in Mr. Carter's letter substantially supports a decision by the Bureau of Alcohol, Tobacco and Firearms approving a Los Caneros Viticultural Area. Each of the factors that Mr. Carter sets forth is consistent with the regulations and demonstrates that the Los Caneros Viticultural Region is a separate and distinct grape growing region. The specific boundaries proposed in Mr. Carter's letter correspond quite accurately to the boundaries of the climatic influence of San Pablo Bay.

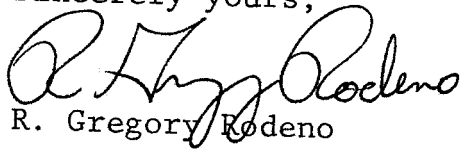
There has been some concern expressed regarding the fact that this viticultural region will include portions of two counties. I am sure that you are aware that political boundaries often do not correspond to topographical factors, soil types, water sheds, or areas of climatic influence. Clearly, such as the case with the proposed Los Caneros Viticultural Region. Even the political boundary separating Napa from Sonoma County has been open to question in the past. Because of the unique viticultural character of the district, we believe that a two county viticultural region

Stephen E. Higgins  
August 2, 1982  
Re: Notice No. 412  
Page 2

is necessary so that the information provided by such a designation is not inherently misleading to consumers.

Thus, we support the proposal contained in Mr. Carter's letter and urge its adoption by the Bureau of Alcohol, Tobacco and Firearms as the definition of the Los Caneros Viticultural Area.

Sincerely yours,



R. Gregory Rodeno

RGR:cj



RENE DI ROSA  
5200 SONOMA HWY  
NAPA CA 94559

western union Mailgram<sup>®</sup>



4-000173S214 08/02/82 ICS IPMRNCZ CSP WSHB  
7072265991 MGM TDRN NAPA CA 50 08-02 1223A EST

*TR & P Div* \_\_\_\_\_  
*gmm*

▶ WILLIAM DRAKE JR  
BATF  
1200 PENNSYLVANIA AVE NORTHWEST  
WASHINGTON DC 20226

OFFICES OF OUR 80 MEMBER ORGANIZATION KEEP CARNEROS GREEN, URGE A  
CARNEROS SUB-APPELATION WITHIN NAPA VALLEY WITH SOUTHERN PACIFIC  
RAILROAD TRACKS AS SOUTHERN BOUNDARY.

ABBOTT WILLIAMS  
CATHE MOON  
IRA LEE  
RENE DI ROSA

00:25 EST

MGMCOMP

ERNIE WEIR <PRESIDENT <HAGASEN C  
PO BOX 3035  
NAPA CA 94558

western union

Mailgram®



4-0157658215 08/03/82 ICS IPMRNCZ CSP WSHB  
7072520781 MGM TDRN NAPA CA 12 08-03 1039A EST

▶ WILLIAM T DRAKE JR BATF TREASURY DEPT  
1200 PENNSYLVANIA AVE NORTHWEST  
WASHINGTON DC 20226

WE ENCOURAGE THE ACCEPTANCE OF A LOS CARNERUS-NAPA VALLEY APPELATION.  
THANK YOU,

ERNIE WEIR  
PRESIDENT  
HAGASEN CELLARS  
PO BOX 3035  
NAPA CA 94558

10:39 EST

MGMCOMP



November 29, 1982

Mr. Stephen E. Higgins  
Acting Director  
c/o Chief of Regulations and Procedures  
Division  
Bureau of Alcohol, Tobacco & Firearms  
P.O. Box 385  
Washington, D.C. 20044-0385

ATTN: Notice No. 412

Dear Mr. Higgins:

After conversations with your Mr. Steve Simon by Mr. Steve Hill and myself of our committee, and after a meeting of the following members of our committee on Wednesday, November 24, 1982:

1. Jim Carter, Sebastiani Vineyards, Chairman
2. Angelo Sangiacamo, Grower
3. Paul Pagoni, Geyser Peak Winery
4. Hubertus von Wulffen, Buena Vista Winery
5. Will Nord, Domaine Chandon
6. Walter Schug, Joseph Phelps Vineyards
7. Steve Hill, Grower

the committee is willing to amend section VIII of our petition.

VIII (amended November 24, 1982). Specific Boundaries of the Sonoma County Portion of the Los Carneros Viticultural Region.

Beginning at the junction of State Highway 12 and 121 and the lines dividing Sonoma and Napa Counties, thence southward along said line to the junction of said line with the Southern Pacific Railroad tracks, thence northerly and westerly along said tracks to the junction of the line dividing Township 5 North and Township 4 North, thence westerly along said line to the junction of said line with the Northwestern Pacific Railroad tracks, thence southerly and westerly along said tracks to the junction of

said tracks with the junction of State Highways 37 and 121, thence northerly in a straight line to Wildcat Mountain, thence continuing in a northwesterly direction along a straight line which joins Wildcat Mountain and Sonoma Mountain until reaching a point on said straight line which is due west of the headwaters of Lewis Creek, thence due east from said point to the headwaters of Lewis Creek, thence southward along the center line of said creek to the junction of Lewis Creek and Felder Creek, thence eastward along the center line of Felder Creek to the junction of said creek and Leveroni Road, thence eastward along said road to the intersection of Leveroni Road and State Highway 12, thence eastward along Napa Road to the junction of said road and State Highways 12 and 121, thence eastward along said Highways to the point of beginning.

Attached you will find a map outlining in red our amended boundaries.

We are hopeful that the BATF will reach a rapid conclusion to the definition of Los Carneros Viticultural Region.

We are also pleased that the BATF is looking favorably upon using "Carneros" and "Los Carneros" in conjunction with "Napa Valley" and "Sonoma Valley".

Very truly yours,



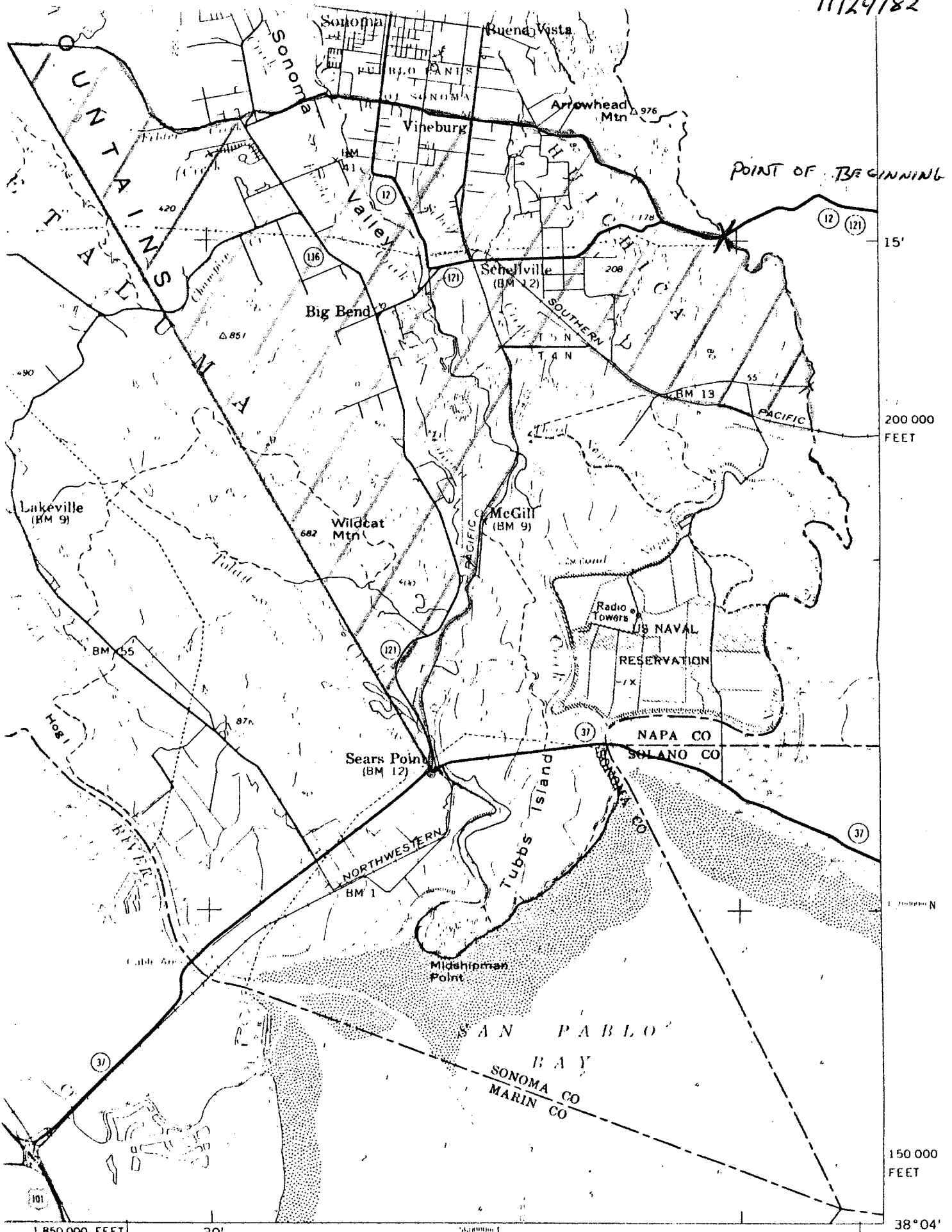
Jim Carter  
Chairman  
Southern Sonoma Valley Ad Hoc Committee  
c/o Sebastiani Vineyards  
P.O. BOX AA  
Sonoma, Calif. 95476

JC/mjk

Attachment

cc: Ad Hoc Committee members  
Sam J. Sebastiani  
Doug Davis

11/24/82



1 850 000 FEET

30'

INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1977

122° 20' 30"

38° 04'

150 000 FEET

200 000 FEET

15'

*Sonoma-Cutrer Vineyards, Inc.*

June 24, 1983

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

Re: Los Carneros proposed viticultural area

Dear Mr. Simon:

As I told you in our telephone conversation yesterday, we have reason to believe that the northern boundary of the Los Carneros viticultural area should be defined by Carriger Creek rather than Lewis Creek at its westernmost corner in Sonoma County. We are in the process of preparing a letter containing evidence that supports our contention, and we will send that letter to you very soon.

Very truly yours,

*Sara Schorske*

Sara Schorske  
Administrative Assistant