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MAYACAMAS VINEYARDS

1155 LOKOYA ROAD, NAPA, CALIFORNIA 94558

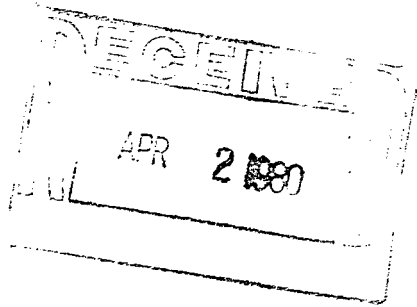
BONDED WINERY No. 4417

TELEPHONE (707) 224-4030

3/26/80

Director, BATE
Office: Chief, Regulations, etc.
Dear Sir:

Please approve the "Napa Valley" viticulture area appellation as applied for. The Napa River watershed is a viticulturally homogeneous area of distinctive nature which produce grape similar and related character. Further, its geographical cohesiveness lends itself well to easy consumer recognition, understanding and identification. Thus, the benefits attendant these factors are manifold to the general public and therefore should not be denied that body of citizens.



Sincerely,
Robert Travers



2

March 31, 1980

WINERY

P. O. Box 410

3022 St. Helena Highway North St. Helena California 94574 Telephone 707/963-7106

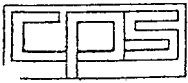
Director
BATF
Dept. of the Treasury
Washington, DC 20004

Freemark Abbey Winery supports the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area. We own and operate 130 acres of vineyard within the proposed area.

Sincerely,

FREEMARK ABBEY WINERY

Charles A. Carpy
Charles A. Carpy



3

Per
4-8-80

CUSTOM PACKAGE STORES INC.

P.O. BOX 4237 • 67 PAUL DRIVE • SAN RAFAEL • CALIF. 94903 479-8770

Retail Merchants of Spirits, Fine Wines and Accessories

April 1, 1980

Director
BATF
Department of the Treasury
Washington, D.C.

Dear Mr. Director:

I strongly support the joint Appellation petition of the Napa Valley Vintners and the Napa Valley Grape Growers. I do so for exceedingly obvious reasons.

I can think of nowhere else in the world of wine where the geographical configurations of an area so obviously define that area.

I have been traveling to the Napa Valley ("to the Valley" we usually say, and everyone knows what valley we mean) for business and family reasons since 1960, and continue to do so weekly. There is no question in my mind that the Valley is a unique and distinct area of viticulture and wine-making.

More important perhaps, than the geography, is the fact that our customers here in Northern California, and I suspect, knowledgeable wine customers the world over, recognize and appreciate the special significance of the wines of the "Napa Valley".

As a wine retailer I am frequently asked for "Napa Valley" wines. The Valley does indeed have a special meaning for California wine drinkers, and deservedly so, for the wines of the Valley have established credentials going back well over one hundred years.

Many retail stores separate the wine sections by region to make it easier for customers and sales clerks to quickly find the wineries they seek; customers know which wineries are in the Napa Valley and this method of merchandising simplifies their selection process.

Furthermore, as a class of wines, the wines of the Napa Valley are generally considered not only different stylistically, but superior to the wines of other wine areas in California. While this statement may be tainted as a generalization, most professional tasters, retailers, restauranteurs, wine writers, wine organizations and tasting competitions will confirm my judgement. One need only read the literature public and parochial to certify this fact.

In conclusion, I wish to make it clear that in my professional opinion there is only one Napa Valley and virtually everyone who knows anything about wines knows where it is, what it stands for, and whose wines come from there: in every sense of the word it is an appellation and should so be honored and described by the BATF.

Sincerely,

Executive Vice President

JG/kw

003

④

The
Wine
Tutor
John Thoreen



David Gentleman engraving reproduced by
kind permission of Harvey's of Bristol.

April 2, 1980

Director
BATF
Department of the Treasury
Washington, D.C.

Dear Sir:

From the point of view of a wine educator who lives and teaches in the Napa Valley and who sees the wine industry nationally by consulting and working as Director of the Society of Wine Educators, I would like to go on record as enthusiastically supporting the joint Appellation petition of the Napa Valley Grape Growers and the Napa Valley Vintners.

On the basis of my teaching hundreds of wine buffs who come to the Napa Valley from all over the country and even abroad, I can add another voice to the general recognition that "Napa Valley" is a de facto appellation that needs at this stage only some reasonable separation from geo-political definition. The petition before you gives sense to the words "Napa Valley"; indeed, given the nascent condition of our viticulture, it gives as much sense as desirable.

Anyone who has traveled extensively through the vineyards of the Napa Valley knows that there are variations of many kinds between Calistoga and Los Carneros. The same experience should teach that few who farm and harvest these grapes are confident enough now to suggest much in the way of meaningful sub-divisions except for single vineyard appellations. Anything more will be the work of several generations. And, given the intricacies of the Napa Valley, we might very well never be able to define, to say nothing of regulate, the best areas for the many varieties we now grow.

I offer this statement also as a very serious amateur winemaker who will probably have a commercial winery sometime. In that role too I have learned after several years how little we, as winemakers, know

about what is possible in the Napa Valley. At this point in time winemakers and viticulturists both need more impetus toward being imaginative rather than getting the sense that the die is being cast on the reputations of specific smaller areas.

At this stage in our State's wine development, I think we would be misleading the consumer by putting too much emphasis on small regions, per se. From my point of view the consumer serves himself best by developing brand loyalties first (which more and more are becoming stylistic loyalties whether due to region, varieties, or technique) and by encouraging wineries to declare their own small region or single vineyard appellations as is happening.

We need to inform the consumer as accurately and as honestly as a label can and this proposed approach to Napa Valley does that. I sometimes feel that the compulsiveness about "truth in labeling" for wine misses the whole point about the nature of wine. I never invest in a wine without tasting it, nor should anyone, nor do my students. One bottle is not an investment.

The ridges that clearly define the watershed of the Napa Valley and provide a keen regional feeling for us who live here should remain for now as adequate viticultural definition too.

Respectfully submitted on April 2nd, 1980, by

John Thoreen
The Wine Tutor



FRANCISCAN VINEYARDS

P.O. Box 407, Rutherford, California 94573 (707) 963-7111

5

April 2, 1980

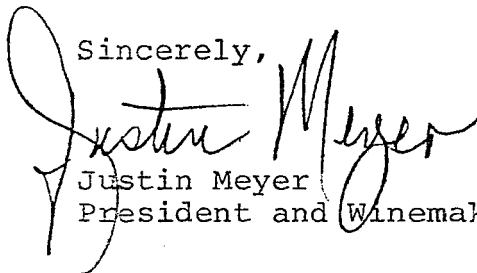
Director
BATF
Dept. of the Treasury
Washington, D.C. 20004

Dear Sir,

I would like you to know that Franciscan Vineyards, Inc. is in support of the Napa Valley Viticultural Area, as outlined jointly by the Napa Valley Vintners and the Napa Valley Grape Growers. Franciscan owns approximately 250 acres within the proposed Viticultural Area. We also buy grapes from independent growers in that area.

Much time and thought went into the development of this proposal. I believe it represents the thinking of most of the growers and wineries in the region. I hope that you will see fit to accept it as proposed.

Sincerely,


Justin Meyer
President and Winemaker

JM:pt

Sterling Vineyards ♦

TELEPHONE: (707) 942-5151



♦ *ESTATE GROWN NAPA VALLEY WINES*

1111 DUNAWEAL LANE P.O. BOX 3651 CALISTOGA, CA. 94515

6

April 3, 1980

Director
BATF
Department of the Treasury
Washington, D.C. 20004

Dear Sir,

Sterling Vineyards supports the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area. We own or control and operate almost 500 acres of vineyard within the proposed area.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Gregory J. DeLucca'. The signature is fluid and cursive.

Gregory J. DeLucca
Vice President & General Manager

GJD/jl

cc: H.E. Teasley, Jr.
M.J. Doyle
C.A. Carpy



7100 CAPITOL DRIVE
LINCOLNWOOD, ILL. 60645

TELEPHONE (312) 465-0800
Telex: GLUNZWINES 910 223 0808

April 8, 1980

Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Sir:

I urge you to help protect the "Napa Valley" petition for using that term. The marketing of wine is difficult and the appellation "Napa Valley" would make it easier for the consumer to discern an area. Since this is standard in European Wines, the wine consumer is already accustomed to it.

Thank you,

A handwritten signature in cursive script that reads "Ted Peloquin".

Ted Peloquin,
Director of Sales

8

April 8, 1980

Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Sir:

As a Wine lover and supporter of California wines, I hope that the
appellation " Napa Valley " be kept as suggested by the Napa Valley
Grape Growers and the Napa Valley Vintners.

Thank you,



Larry Allen Palmerson
1514 W. Diversey
Chicago, Illinois 60614

Schramsberg
FOUNDED 1862

9

Director
BATF
Department of the Treasury
Washington, DC 20004

April 7, 1980

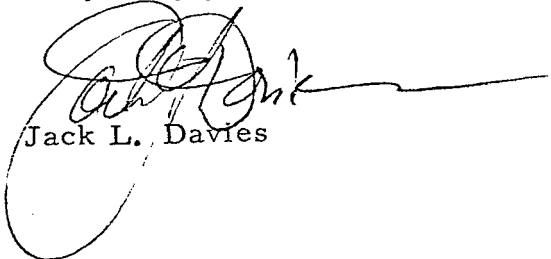
Dear sir:

I regret that I will be out of the United States and unable to attend the hearings on the Napa Valley appellation petition. It has been a staggering experience for me to have participated in this entire process - over the long range of public hearings and months of study on our part.

Based on that experience and on personal contact with thousands of wine consumers, throughout the United States, I can fully support the joint proposal of the Napa Valley Vintners and Growers.

For the record, let me state that we are growers ourselves, farming 40 acres of vines within the proposed area.

Very truly yours,


Jack L. Davies

JLD/kn



10

7100 CAPITOL DRIVE
LINCOLNWOOD, ILL. 60645

TELEPHONE (312) 465-0800
Telex: GLUNZWINES 910 223 0808

April 7th, 1980

Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Mr. Director:

On behalf of myself, our 92 year old family wine firm, our customers, and the many thousands of wine lovers in the Illinois market, I urge you to protect the "Napa Valley" and the petition for appellation which has been proposed by the Napa Valley Grape Growers and Napa Valley Vintners.

I thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph B. Glunz", written in a cursive style.

Joseph B. Glunz,
Vice President

Omaha World-Herald

The Newspaper of the Midlands

April 11, 1980

World-Herald Square
Omaha, Nebraska 68102
(402) 444-1000



Director

BATF

Dept. of Treasury

Washington, D.C. 20220

Dear Sir:

I support the joint appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners.

I believe the Napa Valley is recognized by wine buyers as one of several distinctive wine producing regions in the world. I believe that "Napa Valley" is a distinct geographic region with definite boundaries that are recognized both by California residents and wine buyers in the Midwest.

Sincerely yours,

A handwritten signature in cursive script that reads "Jane Palmer".

Jane Palmer

Food Writer

jp

ST. LOUIS POST-DISPATCH

THE PULITZER PUBLISHING COMPANY

FEATURES

12

April 11, 1980

Director
BATF
Department of the Treasury
Washington, D.C., 20220

Dear Sir ---

As a wine columnist and wine drinker, I feel strongly that the joint Appellation petition of the Napa Valley vintners should be accepted and that the valley should receive the appellation.

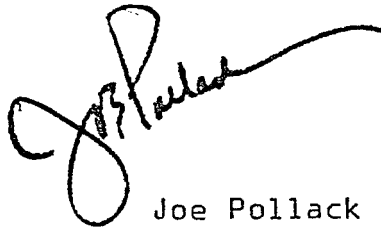
For all my years as a person with interest in wine -- as a drinker and as a writer -- the term "Napa Valley" has been distinctive, describing a certain type of wine from a specific region.

To break up the Valley into dozens of smaller regions would confuse the consumer and create all sorts of difficulties.

I think that the proposal is a fair and reasonable definition of the Napa Valley, and I urge that the proposal be accepted.

Thank you.

Best wishes. . . .



Joe Pollack

jefferson morgan
867 Sunnyhills Road
Oakland, California 94610

13

April 10, 1980

The Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
Washington, D.C. 20220

Dear Sir:

As the author of two books about the wines of California, "Guide to California Wines" and "Adventures in the Wine Country," as well as a syndicated newspaper column on the wines of the world, I strongly support the joint petition of the Napa Valley Vintners and the Napa Valley Grape Growers Association for a "Napa Valley" appellation of origin.

I have examined the criteria spelled out in the BATF regulations, and they almost look as if they were written with this area in mind:

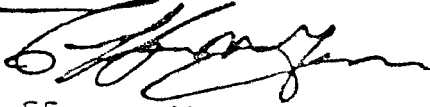
- The viticultural area is known not only locally and nationally, but internationally as well.
- Historically the region has been recognized as a single winegrowing area since the first grapes were planted one and a quarter centuries ago.
- The valley is well defined geographically and ecologically.
- The boundaries of the valley and its watershed are easy to find on U.S.G.S. maps.

I understand that a few have objected to the proposed appellation on the grounds the area involved is too large. The fact is the Napa Valley is a single piece of real estate affected by the same weather factors. There are, of course, subtle differences in soil and microclimates here, as in designated wine districts throughout the world. But to suggest that an area that has been recognized by consumers for generations should be cut into smaller appellations is to invite balkanization of the region and confusion among winedrinkers everywhere.

In short, it is my professional opinion that the petition

seeks only to reconfirm what is already a historic and natural reality.

Sincerely,



Jefferson Morgan

e

STONY HILL VINEYARD P. O. BOX 308 ST. HELENA, CALIFORNIA 94574

April 10, 1980

14

Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
Washington, D. C. 20220

Dear Sirs:

Re: Napa Valley Appellation

The owners of Stony Hill Vineyard wish to go on record as emphatically in favor of the application before you made jointly by the Napa Valley Vintners and the Napa Valley Grap growers.

While Stony Hill is one of the smaller operations in the Napa Valley, since we have only some thirty-five acres of grapes, we make our wine only from our own grapes and are therefore in the strictest sense of the word "estate bottled".

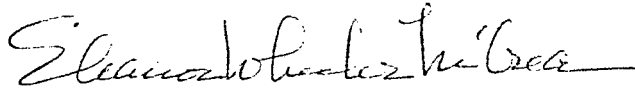
Having been producing wine since 1955, we are one of the oldest of the small wineries and have been consistently successful. In fact, with all due modesty, our wine seems to have acquired a world-wide reputation. One factor in that achievement I am sure has been the fact that we are a "Napa Valley" wine.

Both historically and geographically there would seem to be no question that the boundaries as presented to you in our application are those generally assumed to be the Napa Valley.

We hope very much that you will approve the application.

Sincerely yours,

STONY HILL VINEYARD



Mrs. Frederick H. McCrea
President

Estrada's, Inc.

P. O. BOX 537 2109 STRAND

GALVESTON, TEXAS 77553

April 9, 1980

15

Director
BATF
Department of the Treasury
Washington D.C. 20220

Dear Mr. Director:

I strongly support the joint Appellation petition of the Napa Valley Vintners and the Napa Valley Grape Growers. I do so for exceedingly obvious reasons.

As a wine wholesaler I am frequently asked for "Napa Valley" wines. The Valley does indeed have a special meaning for California wine drinkers, and deservedly so, for the wines of the Valley have established credentials going back well over one hundred years.

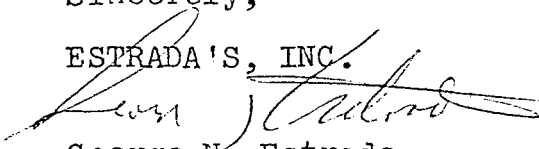
Many retail stores separate the wine sections by regions to make it easier for customers and sales clerks to quickly find the wineries they seek; customers know which wineries are in the Napa Valley and this method of merchandising simplifies their selection process.

Furthermore, as a class of wines, the wines of the Napa Valley are generally considered not only different stylistically, but superior to the wines of other wine areas in California. While this statement may be tained as a generalization, most professional tasters, retailers, restauranteurs, wine writers, wine organizations and tasting competitions will confirm my judgement. One needs only to read the literature, public and parochial, to certify this fact.

In conclusion, I wish to make it clear that in my professional opinion there is only one Napa Valley and virtually everyone who knows anything about wines knows where it is, what it stands for and whose wines come from there. In every sense of the word, it is an appellation and should be honored and described by the BATF.

Sincerely,

ESTRADA'S, INC.


George N. Estrada

F. A. A. BASIC PERMIT NO. DAL P-822
IMPORTERS BASIC PERMIT NO. DAL 1-78
STATE PERMIT NO. W-46

(10)
TELEPHONE | AREA CODE 504
865-0238

Blue Grass Liquor Company, Inc.

WHOLESALE LIQUOR DEALER
909 W. 62ND ST. BOX 8725
SHREVEPORT, LA. 71108

14 April, 1980

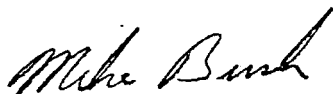
Director
Bureau of Alcohol, Tobacco & Firearms
Department of Treasury
Washington, D.C. 20220

Gentlemen:

With regard to the Napa Valley Appellation, I wish to state that I support the joint Appellation petition of the Napa Valley Grape Growers and the Napa Valley Vintners, wholeheartedly.

I believe the Napa Valley is recognized by consumers as one of the most distinctive wine producing regions in the World and that, in my experience and judgement, the proposal is fair in its description which defines the area which produces wines known as "Napa Valley."

Sincerely,



Mike Bush
Wine Supervisor

/as

THE VERTNER SMITH COMPANY INC.



17

April 16, 1980

Director,
B.A.T.F.
Department of Treasury
Washington, D.C. 20220

Dear Sir:

I would like to add my support, as a wine and spirit wholesaler in the State of Kentucky, to the creation of "Napa Valley" appellation, under certain conditions.

First, the boundaries of this unique viticultural area should be well defined geographically to avoid future expansion of this area. I feel that the joint appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners meets this criteria.

That this area is widely recognized by consumers as the finest wine growing area in the United States is beyond dispute. Once this appellation is established, some thought should be given to protecting it. I feel that once created, there should be a rule making this area a permanent viticultural area unless 75% of the area's Growers and Vintners agree that a change should be made. Only then could the matter be brought to the hearing stage.

Let me know if I can be of any further assistance.

Sincerely,

Vertner D. Smith, III

cc: Mr. Jack Davies, Schramsberg Vineyards
Mr. Bruce Neyers, Joseph Phelps Vineyards

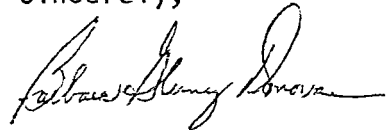
April 11, 1980

Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Mr. Director:

The California wine industry has worked years to earn the respect of the American people for the micro-climatic differences which are now designated on the labels. Wine drinkers appreciate the knowledge so given and deserve this knowledge. I agree with the proposal of the Napa Valley Growers and Vintners Associations protecting the "Napa Valley" label designation.

Sincerely,



Barbara Glunz Donovan

BGD:ms

ROBERT MONDAVI WINERY



OAKVILLE, CALIFORNIA

ZIP CODE 94562
P. O. Box 106
TELEPHONE (707) 963-9611

April 28, 1980

#18

Director of BATF
Bureau of Alcohol,
Tobacco, & Firearms
525 Market St., 34th Floor West
San Francisco, CA 94102

Dear Sir:

Since 1937, my father has been crushing grapes in the Napa Valley. These grapes have come from the various areas of Napa County:

Carneros, Yountville, Oakville, St. Helena, Calistoga,
Pope Valley, Chiles Valley, Wooden Valley and Gordon
Valley.

As a result of his own and our collective experiences in producing wines from these various regions, we have, in addition to other contracts, entered into a long-term contract with Cal Plans Vineyards for grapes from Wooden Valley. Since 1975 this Wooden Valley Vineyard has contributed significantly to the production and character of our Zinfandel and Napa Gamay and to a lesser extent to our Fume Blanc, Cabernet Sauvignon, and Johannisberg Riesling.

We have also received grapes from the historic Abruzzini and Loney/Gordon Vineyards in Gordon Valley. These grapes have contributed to our Moscato d'Oro wine.

All of these wines have carried the Appellation Napa Valley and in so doing, have contributed to it's name. It is definitely our feeling, and apparently that of our consumer, that these wines exhibit the character of Napa Valley. As a result, we urge that you allow the continued use of these historic viticulture areas in the Napa Valley Appellation.

Sincerely,

Tim Mondavi
Executive Vice President/
Winemaker

TM/ldg

19

April 11, 1980

Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Mr. Director:

The petition for appellation which has been proposed by the Napa Valley Grape Growers and Vintners is of utmost importance to the wine industry. Without the appellation, "Napa Valley", many valuable reputations could be lost forever. I urge you to protect this petition which will insure the Growers and Vintners fine reputation.

Sincerely,

Mark Larson,
Merchandise Mgr.



ML:ms

I N T R O D U C T I O N

JOHN WRIGHT
#19

My name is John Wright. I am the president of
Domaine Chandon. Domaine Chandon is a major producer
of methode champenoise sparkling wine marketing two
cuvees or blends that are labeled "Napa Valley
Sparkling Wine". We currently own and manage 550
acres of Napa Valley vineyard and own an additional
500 acres destined for future planting. Last year
we purchased approximately 20% of the open market
Pinot Noir and about 10% of the open market Chardonnay
sold and grown in the Napa Valley.

P U R P O S E

The purpose of my comments today is to describe the
deficiencies and discrepancies that will arise by
designating the Napa-Sonoma County line ^{as} ~~is~~ the ^{extreme} south-
western boundary of the proposed Napa Valley Viticultural
Area and to suggest some alternatives for dealing
with the problem.

(Show map)

GENERAL COMMENTS

Before proceeding with the specific problem of the proposed southwest boundary, I wish to comment briefly on the question of appellations and the interest of the consumer. Most wine appellations in the world include the naming of regions, districts and specific localities. The consumer is best served by taking a rather flexible approach to the definition of a region or macro-viticultural area, such as the Napa Valley. To overly restrict the region or macro-area could lead to higher prices through unnecessary restriction of potential supply and could also stifle innovation by excluding potential interesting vineyard sites or localities that were not included in the original definition of the region. A reasonably flexible approach also means to me that grapes grown in a delineated district within a delineated region have the opportunity to be either part of the region (example Napa Valley) or the district (example, Carneros). Such a system gives the consumer greater choice in terms of ^{with} perceived quality and price levels.

deliberate

DEFINITION OF THE PROBLEM

The underlying reason for these hearings goes, I believe, back to Section 4.25 a (e) 1, Title 27, CFR which define an American viticultural area as a delineated grape growing area distinguishable by geographical characteristics.

The emphasis on geographical characteristics implies that a viticultural area should not correspond generally to geopolitical boundaries because the origins of geopolitical boundaries are unlikely to have been based upon viticultural criteria.

I have no quarrel with the use of the Napa-Sonoma political boundary from the North extending as far south as ^{Route 121} ~~Napa City~~ because this line lies along the ridge of a steep mountain range which clearly separates two geographic zones. However, the use of the county line below Napa City starting at Route 121 south to the Southern Pacific Railroad ~~clearly~~ ^{appears} to violate the basic intent of Section 4, Title 27 CFR. (show map)

The boundary I refer to runs directly through ^{part} ~~the~~ ~~middle~~ of the Carneros District. In fact, the Sonoma-Napa County line at the southernmost part (just north of the Southern Pacific) bisects two large vineyard parcels - one owned by Buena Vista; the other, by Domaine Chandon.

Show
Map -
Explain

In conversations with those people involved with developing the boundaries of the present petition, I conclude that the reason for using the Napa Sonoma County line through the rolling hills of Carneros was based on:

- a) Expedience and
- b) Pre-judgment of BATF thinking.

REFER TO (U.S.G.S. MAP) EXHIBIT

The U.S.G.S. map (which includes the Sears Point, Cuttings Wharf, Napa and Sonoma quadrangles) shows that there is no obvious land form creating a Napa Valley boundary (unlike the ridge North of Route 121). Therefore, in order to conform to requirement "d" in the petition (the specific boundaries of the viticultural area, based on features which can be found on U.S.G.S. maps), the expedient thing to do

is to use the county line as drawn on the U.S.G.S. map. Had ^{upon closer} ~~these people~~ done any investigation, ^{one} ~~they~~ would have found that the U.S.G.S. map is inaccurate. I have included in my exhibits the Sonoma and Napa tax assessors' maps of the area based upon the definitive ground survey conducted in 1877 (a copy is also included) which shows the line at the intersection of Ramal Road to be approximately one half mile west of the U.S.G.S. map. Thus the U.S.G.S. map erroneously classifies ^{well} over ~~100~~ ²⁰⁰ acres of Napa County vineyard owned by both Buena Vista and Domaine Chandon as being in Sonoma County.

However, I am not here to nit pick about technical matters. The issue is far more fundamental. I suspect that when they were drawing up the proposed Napa Valley boundaries, the people in question believed that the BATF would not accept a delimited area that crossed county lines (i.e. the Napa Valley must be smaller than Napa County). This is an example of responding to what you think people want to hear rather than focusing on the facts and the underlying intent of the ruling - namely that geographic criteria rather than geopolitical criteria are to be the guide.

If we apply geographical criteria to the boundary in the Carneros hills, we find the following significant features:

A. S O I L S - (Soil maps of the area from Sonoma and Napa Counties). The appropriate official soil surveys of Sonoma and Napa Counties show that in the specific areas in question there is a uniformity of soils encompassing a large area to the east and west of the Napa-Sonoma line from the Southern Pacific up to Route 121. These are the typical "Carneros" soils of the Haire-Coombs-Diablo series. (Soils below Southern Pacific are peat and saline and unsuited to vineyards). The general soils maps of Sonoma and Napa counties show that Haire series soils on the eastern side of Sonoma County are largely restricted to the area: From County line on Route 121 west to the Southern Pacific, then southeast on Southern Pacific to the Napa County line. In Napa County, the Haire soils series are predominant in the Rincon de los Carneros, Huichica and ~~Entero Napa ranches~~. *But exist elsewhere further north*. In short, from a soils point of view, Carneros cuts across county lines (Reference: Consumers' Guide to Wines).

(map over)

B. C L I M A T E - I have submitted exhibits which show the climate of the Carneros area to be identical regardless of county lines.

C. W A T E R S H E D - The watershed of the Napa River lies east of the Napa Sonoma line. Referring back to the U.S.G.S. map, we find a major drainage area which happens to run through Domaine Chandon land just to the west of this ridge line. This creek which drains out of the top of the Mayacamas mountains, flows into Hudeman Slough. I have personally gone down and thrown corks into the slough and verified that at ebb tide the flow is into the Napa River.

(map only)

H I S T O R I C E V I D E N C E

I am submitting for your review several documents which prove that:

- a) The Napa Valley was always considered to extend all the way to San Pablo Bay (Quote).
- b) That the name Carneros refers historically to three Ranchos (Carneros, Entre Napa, and Huichica). A name in former use (La Loma - meaning the hills) was identical in boundaries to Carneros.

- c) The Carneros or Loma Hills district has a significant viticultural history.
- d) That Carneros has always been a district associated with the Napa Valley even though a part of the Huichica Rancho lies within Sonoma County.

P R O P O S E D S O L U T I O N

Based on geographical criteria, I would recommend that the current southwest boundary be redrafted in either one of the following ways. The more flexible - Napa Sonoma County Line to Route 121. Thence west on 121 to intersection with Southern Pacific, then southeast along Southern Pacific to the Napa River.

(Map)

The logic for using the Southern Pacific Railroad is twofold. The railroad tracks are an almost exact border between Haire series soils and Reyes soils. The latter are thought to have little or no capability for viticulture because of high winter water tables, saline content and excessive acidity. The other reason is that the railroad is easily detected on U.S.G.S. maps.

The disadvantage of progressing as far west as the junction between Route 121 and the Southern Pacific lies with the fact that the Napa River watershed may end beyond a ridge line which I have indicated on my U.S.G.S. exhibit.

If this is of critical importance to the appellation petition, the boundary could be placed along this ridge running from 121 to the Southern Pacific.

C O N C L U S I O N

A considerable amount of thought, time and effort has been put into the definition of the Napa Valley by the Napa Valley Growers, and the Napa Valley Vintners. Basically I endorse the concept of the petition and would prefer not to raise objections.

On the surface it would appear that the exact location of the boundary that constitutes only a small part of the total area is of little significance. Unfortunately, this is not the case because:

a) The boundary in question is probably the only one

which runs directly through approximately 850 acres of current vineyard and 400 acres of land planned for vineyard development in the next three years. (This amounts to about 5% of the current Napa County acreage).

- b) The border in question will also probably be used to define the Sonoma Valley.
- c) The later probable definition of a Carneros District is affected as well. The evidence clearly shows that the Carneros District includes parcels in both counties. Does it make sense to have a Napa Carneros and a Sonoma Carneros, particularly when Carneros has always been associated with Napa?
- d) The concept of running a geo-political border directly through existing vineyards blatantly defies the underlying principle of a viticultural area based on geophysical criteria.

WILLIAM J. FERGUSON, JR., M.D. WILLIAM J. CASEY, M.D.
INC.

FOUR NINETY POST STREET - SUITE 934

SAN FRANCISCO, CALIFORNIA 94102

TELEPHONE 421-1866

April 14, 1980

20

Director
BATF
Department of Treasury
Washington, D. C.

Dear Sir:

It has come to my attention that a petition for a joint appellation has been made by grape growers and winemakers in the Napa valley. I would like to offer my strong support for this petition.

The Napa valley is known throughout the United States and indeed throughout the world as our country's most prestigious region for grapes and wine made from those grapes.

It seems eminently logical to define this area as an Appellation bearing the name "Napa Valley". The geography of the region is clearly defined and lends itself naturally to such a designation.

I am told that some have proposed dividing the valley into smaller areas for designation. To my mind, this would be a great mistake. The region "Napa Valley" has wide recognition and sub-classification would confuse, more than enlighten, the consumer.

I hope that you will give these thoughts careful consideration in making your decision.

Yours sincerely,

William J. Casey, MD

William J. Casey, M. D.

WJC:b

21

JULIUS L. JACOBS PUBLIC RELATIONS

490 POST STREET, SAN FRANCISCO, CALIFORNIA 94108 • (415) 362-2211
46 SEVENTH AVENUE, SAN FRANCISCO, CALIFORNIA 94118 • (415) 752-2160

April 13, 1980

The Director,
BATEF
Department of the Treasury
Washington, D.C. 20220

Dear Sir:

This letter is in firm support of the petition of both the Napa Valley Vintners and the Napa Valley Grape Growers for establishing the appellation "Napa Valley."

There can be no doubt that of all the winegrowing regions of the United States, that designated as the Napa Valley is the most distinct, the most prestigious---and certainly the one most widely known throughout the country and perhaps most of the wine world for its quality and its character.

For many many years, speaking personally as a journalist and a wine writer, I worked for the Wine Institute. During my years there we had a tremendous task to educate thousands of people who wrote, who visited, who came from foreign countries, to recognize that that there was another wine growing region of California other than the Napa Valley. Today, while other district and regions have gained considerable stature, I believe it is recognized that the designation Napa Valley still stands for a cachet and a reputation that surpasses all others.

I also must emphasize that this is a unique designation and one that surely is entitled to its own appellation, based upon its climate, its elevation and its physical configuration. It is different from surrounding areas in fact and in reputation. The wine consumer is certainly entitled to enjoy wines which proudly bear the label "Napa Valley" and to recognize that these are wines produced from vineyards in this specific Valley, as defined by the watershed of the Napa River, created as a unique entity by the geographical location between the foothills on each side, the termination of the Valley on the north and its similar limitation on the south by the encroachment of San Pablo and San Francisco bay.

It is my belief that this Napa Valley appellation would be a fair, a proper, and a historical justification for the wines that will continue to be produced by the scores of fine wineries that now inhabit this Valley.

Sincerely

Julius L. Jacobs

22

April 11, 1980

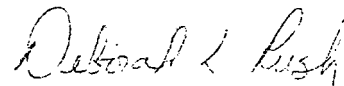
Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Mr. Director:

As a representative for a major Chicago wine wholesale house, I strongly support, and urge your support also, for the recently proposed petition for appellation by the Napa Valley Grape Growers and Napa Valley Vintners.

Thank you for your consideration.

Sincerely,



Deborah L. Rush,
Wine Sales Representative

DR:ms

23

April 11, 1980

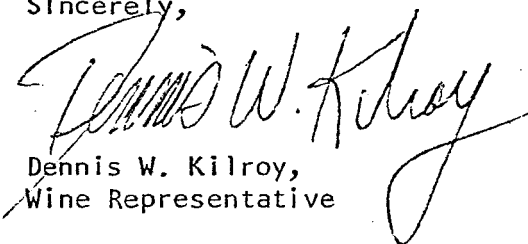
Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Mr. Director:

Concerning the issue of appellation for the Napa Valley, I strongly believe that in the best interests of quality that individual place names must be given Official Status. The proposal by the Napa Valley Growers and Vintners Associations to protect the "Napa Valley" is of primary concern to all lovers of wine.

I thank you for your cooperation.

Sincerely,



Dennis W. Kilroy,
Wine Representative

DWK:ms

COOKING CLASSES

24

691 La Loma
Pasadena, California 91105
(213) 441-2075

Director:

BATF

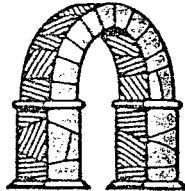
Rest of Treasury
Washington, DC

Dear Sir

I heartily support the joint
appellation petition of the Napa
Valley Vintners and the Napa
Valley Grape Growers.

I teach cooking classes and
enjoy enclosing "Napa Valley"
wines because people know
& respect wines from that
area.

Sincerely
Susan Kranwinkle



received
4/7/80
(25)

STONEGATE WINERY
1183 Dunaweal Lane
Calistoga, California 94515
Telephone (707) 942-6500

April 2, 1980

Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
Washington, D. C. 20004

Dear Sir:

This is to let you know that Stonegate Winery supports the Napa Valley Vintners group and the Napa Valley Grape Growers in their proposal for the Napa Valley Viticultural Area.

Stonegate owns and operates a 40 acres of vineyard within the proposed area.

Thank you.

Sincerely,

David B. Spaulding

David B. Spaulding
General Manager
STONEGATE, INC.

216

MATESICH DISTRIBUTING AGENCY

705 KEEN STREET
P. O. BOX 2426
ZANESVILLE, OHIO 43701
☎ 614-452-7596

475 DANIEL AVENUE
P. O. BOX 411
NEWARK, OHIO 43055
AC 614-345-6694

Zanesville, Ohio
April 14, 1980

Director
BATF
Department of the Treasury
Washington, D.C. 20220

Dear Sir:

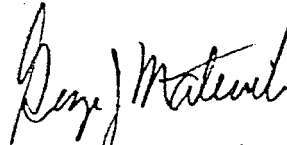
Reference: Notice No. 337
Napa Valley Viticultural Area

Our company wishes to express its support for the joint Appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners to establish the Napa Valley Viticultural Area.

It our contacts with wine consumers over the last 30 years, it is our opinion that they recognize the Napa Valley as a distinctive wine producing region. We also believe that the proposed area defined in the petition fairly outlines the area which produces wines known as Napa Valley wines.

We are convinced that wine consumers will benefit from the designation of viticultural areas such as the Napa Valley.

Sincerely yours,



George J. Matesich
Vice-President

GJM:V

WISCONSIN BEVERAGE JOURNAL
606 West Wisconsin Avenue
Milwaukee, Wisconsin 53203

97

Herbert D. Zien
Publisher

April 14, 1980

Director
BATF
Dept. of Treasury
Washington, D.C. 20220

Dear Sir:

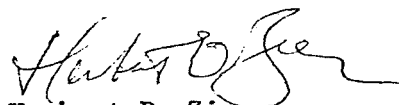
I fully support the joint appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners for the following reasons.

That the Napa Valley is recognized by consumers as one of the most distinctive wine producing regions in the world and that, in my experience and judgement, the proposal fairly describes and defines the area which produces wines known as "Napa Valley".

To my knowledge, wines showing an appellation of origin on their labels have a better consumer acceptance than non appellation wines. This is a spin off from the many wines imported from Europe labeled with their appellation of origin.

Sincerely,

Wisconsin Beverage Journal


Herbert D. Zien
Publisher

HDZ:me



28

April 14, 1980

Director
BATF
Department of the Treasury
Washington, DC 20220

Dear Sir:

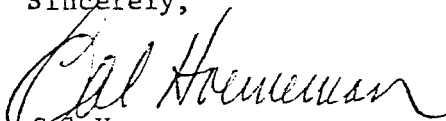
I wish to add my support to the Napa Valley Vintners and Napa Valley Grape Growers petition for the establishment of the Napa Valley appellation.

As a founding member of the Wine Educators Society, and instructor of wine and beverage classes and as the wine columnist for the Detroit News I have often used the Napa Valley as an example of an area that would be identified should a viticultural appellation system be established in the United States.

I believe their petition best describes that area in terms of geographical features and uniqueness. Their boundary is that of the U.S.G.S. maps and follows the ridge lines which demark the watershed.

If any area should qualify or set the standards for the establishment of a viticulture appellation it is the Napa Valley.

Sincerely,


Cal Hoerneman

jlw/CH

29

HERITAGE HOUSE WINES

PO Box 52822 / 2812 Toulouse Street
New Orleans, Louisiana 70152 / 504-482-1111

April 14, 1980

Director of the Bureau of Alcohol, Tobacco
and Firearms
Department of the Treasury
Washington, D. C. 20220

Gentlemen,

It has come to my attention that you are considering establishing the Appellation "Napa Valley".

In reviewing the request on the part of the Napa Valley grape growers and Napa Valley Vintners, it would appear that their delimitation of the area is well within accepted boundaries for the Napa Valley and that we do support their petition to establish the Napa Valley as an area within California.

In my experience, most consumers accept this area as one of the most prestigious in California. This reputation has been built over many years of marketing quality products and we feel that the destruction of the availability of this appellation to these wineries would be a distinct hardship on both the growers, as well as creating a great deal of confusion in the mind of the consumer.

The Napa Valley area in California is recognized, not only among consumers in the United States, but carries great weight among wine experts in other markets throughout the world, as well. For example the French readily recognize the quality of products produced in California's Napa Valley.

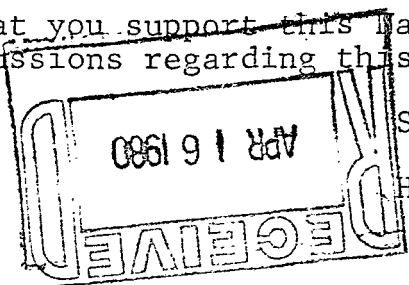
Again, to give up this Appellation would not only affect the reputation of these wines in the United States, but also would give up part of California's reputation world wide, and make it more difficult for our exports to meet quality standards in other markets.

We would ask that you support this Napa Valley Appellation in your continuing discussions regarding this matter.

Sincerely,

Heritage House Wines

Max Zander
Max Zander
Vice President



Western-Davis Limited
Wholesale Liquor
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Quality Products and Service Since 1933

1800-A Bassett St., Box 5542 / Denver, CO 80217 / (303) 534-1711

30

April 9, 1980

Director
B.A.T.F.
Department of Treasury
Washington, D.C.

Dear Mr. Director:

On behalf of my colleagues in the wine trade in the state of Colorado, I strongly urge you to adopt the joint Appellation petition of the Napa Valley wineries and the Napa Valley growers.

Being a veteran of 19 years of the International Wine Trade, I can think of no region which is more representative of classic California style and quality. The uniqueness of this region and of its underlying dedication to quality deserves to receive this Appellation. Sometimes I become distressed over wineries alluding to the fact that they are Napa Valley when in fact, they are not and I feel that this policy is a viable vehicle to place the wineries of Napa in a special category where they most certainly belong. As there is only one Pauillac in France, so there is only one Napa Valley and recognition is now most rightly deserved.

Sincerely,



Robert Alderman
Vice President

RA/ca
cc: Jack Davies

Published
Twice
Each Month

Texas Beverage News

The Newspaper
Of The
Industry

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3320 Camp Bowie Blvd.

Fort Worth, Texas 76107

817/335-2322

April 11, 1980

31

Mr. G.R. Dickerson
Director
BATF
Federal Office Building
12th & Pennsylvania Ave.
Washington, D.C. 20226

Dear Mr. Dickerson:

I write in strong support of the joint Appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners, now pending before your agency.

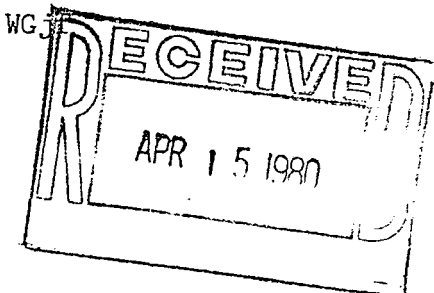
Knowledgeable and progressive wine retail merchants in the Texas market section their California wines by region as an aid to their customers and certainly the Napa Valley is recognized in this area as distinct area of viticulture and winemaking. Approval of the Appellation petition would be, in our opinion, logical and appropriate.

Many thanks for your consideration of our request. With best regards.

Sincerely,



Walter Gray
Publisher



HUBCO

32

P.O. BOX 17414
SALT LAKE CITY, UTAH 84117
(801) 278-8782

April 15, 1980

Director
EATF
Dept. of the Treasury
Washington, D.C. 20004

Dear Sir,

I want you to know, and to go on record, as supporting the NAPA VALLEY
VINTNER and NAPA VALLEY GRAPE GROWER proposal for the NAPA VALLEY
VITICULTURAL AREA.

In my estimation the above proposal would more truly represent the
real needs of the consumer, ie., by giving him a large enough of a
supply area, controlled by the boundaries of the watershed area.

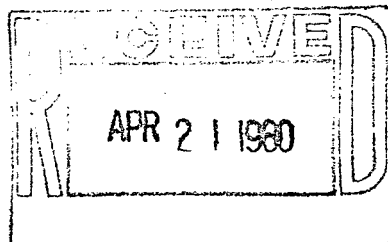
Sincerely,

Gerald E. Hulbert
Gerald E. Hulbert

GEH:lh

cc: Franciscan Vineyards.

P.S. I am the past chairman of the Utah Liquor Control Commission,
having served for 5 years in that capacity and know the needs
of consumers of California wines, relative to appellation areas.



The CONSUMER Wineletter

published and edited by HENRI FLUCHÈRE 21 OAK ST. IRVINGTON, N. Y. 10533

33

THE DIRECTOR, BATF
Department of the Treasury
Washington, DC 20220

Dear Sir:

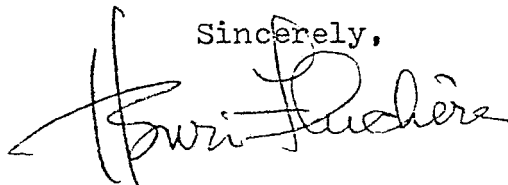
For at least the past two decades I have been increasingly concerned as a wine writer and educator with American wine appellations, particularly from the standpoint of the consumer.

I strongly support the joint Appellation petition of the Napa Valley Vintners and the Napa Valley Grape Growers.

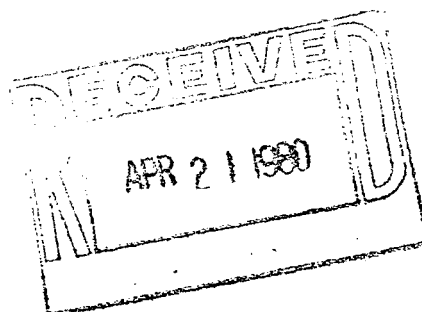
I feel there is no need to repeat the well-planned and explicit reasons these organizations have put before you beyond stating that I support this viewpoint completely.

It is time that American wine regions were recognized officially, and I urge the BATF to proceed toward this end with diligence. The consumer will be better served.

Sincerely,



Member of American Wine Society, Society of Wine Educators, Americans for Wine, WINO. Author of "WINES". Publisher of "The Consumer Wineletter".



BEVERAGE DISTRIBUTORS, INC.

34

31009 San Antonio Street
Hayward, California 94545
Tel: (415) 489-8400

16430 Phoebe Avenue
La Mirada, California 90638
Tel: (213) 941-3278

April 15, 1980

Director
BATF
Department of Treasury
Washington D. C. 20220

Gentlemen:

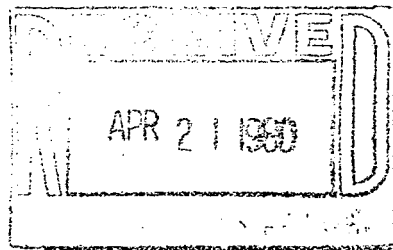
As a California and Arizona wholesaler of many fine brands of "Napa Valley" wines, we wish you to know that we whole-heartedly support the Napa Valley Vintner and Napa Valley Grape Growers proposal for the Napa Valley Viticultural Area.

Yours very truly,



Ted R. Bjerkan
Vice President

TRB:lad





35

April 14, 1980

Director
BATF
Department of the Treasury
Washington, D.C.

Dear Mr. Director:

As a vineyard owner and grower, as a winery owner and winemaker, and as a lover of fine wines, I strongly support the unanimous decision reached by the Napa Valley Vintners and the Napa Valley Grape Growers in their petition of Appellation for the Napa Valley.

Napa Valley is a valley. It is not just a general area. It is not a county boundary in any sense. It is just what it says and just what it has always meant--The Valley. You can go anywhere in the world and say "Napa Valley", and if the person is at all familiar with wine, he will know exactly where you are talking about. Most anyone in Northern California, when you say to them, "I'm going to the Wine Country", they will say the Napa Valley or even more closely defined as The Valley. The watershed of the Napa River is The Valley.

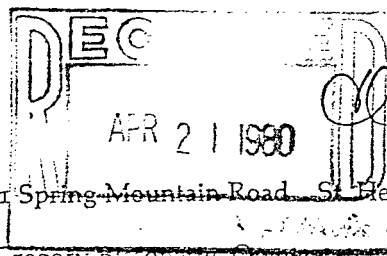
I led a wine tour through the wine regions of France last May. When I would tell people I was a winemaker from the Napa Valley, they would say, "Oh, I hear great things about Napa Valley wines. You must be very proud to be making wines in such a distinguished and world-renowned valley." If I said nothing about where I was making wine, they would say, "Oh, I know of your Napa Valley, is that where you make wine?"

The Napa Valley is known for its superior wines worldwide. There is no reason for that very special region to include any area growing grapes outside of the Valley. The Napa Valley is very correctly the watershed of the Napa River.

It all seems so logical to me that I would find it difficult to see any other decision being made by the BATF than to support the application in favor of the Napa Valley being the Valley.

Sincerely,

cc: Charles A. Carpy



Chateau Chevalier Winery P.O. Box 991 3101 Spring Mountain Road, St. Helena, California 94574 (707) 963-2342

048

Gregory Bissonette, Owner

36

Forman Bros., Inc.

4235 SHERIFF ROAD, N.E. • WASHINGTON, DISTRICT OF COLUMBIA 20019

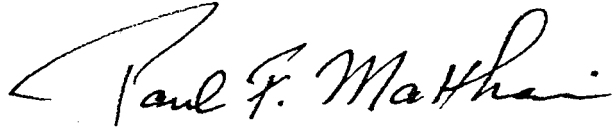
April 16, 1980

Director
BATF
Dept. of the Treasury
Washington, D. C. 20004

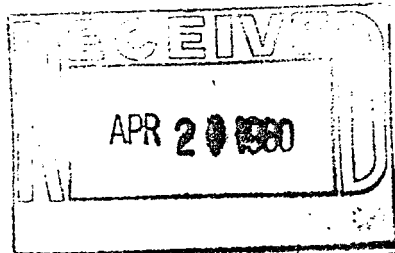
Dear Sir:

As an interested Wine & Spirit Wholesaler, we want you to know that we support the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area. We believe the Napa Valley is recognized by the consumer as one of the most distinctive wine producing regions in the world and in our experience and judgment, the proposal fairly describes and defines the area which produces wines known as "Napa Valley."

Sincerely,



Paul F. Matthai
Vice President/
General Sales Manager



PFM:cm





37

(615) 577-5541

EVERAGE CONTROL INC. - BOX 126 - KNOXVILLE, TENN. 37901

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RON RICO RUM

RELSKA VODKA

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VIRGINIA GENTLEMAN

WILD TURKEY

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JOSE CUERVO GOLD

WINES

CHRISTIAN BROS.

GALLO

KRUESCH

KAYSER

B & G

LANCERS

HARVEY'S

MUMM'S CHAMPAGNES

April 14, 1980

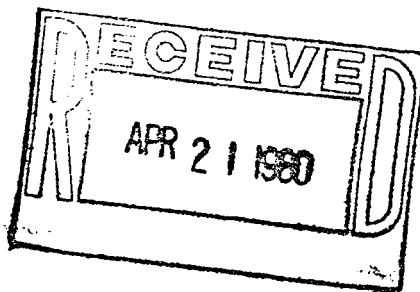
Director
BATF
Department of the Treasury
Washington, D. C. 20004

Dear Sir:

I want you to know that I support the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area.

Sincerley,

Don Jackson
V. President
Wine Division



(38)

Victor L. Robilio Co., Inc.

3680 AIR PARK ST. P.O. BOX 18047
MEMPHIS, TENNESSEE 38118
362-0933

April 15, 1980

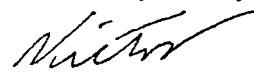
Director
BATF
Department of the Treasury
Washington, D.C. 20004

Dear Sir:

We support the Napa Valley grower and the Napa Valley Vintner proposal for the Napa Valley Viticultural area. Their recommendation is very sound.

I teach "Wine Appreciation" courses at both Memphis State University and Southwestern of Memphis.

Yours very truly,



Victor L. Robilio, Jr.
President
Victor L. Robilio Co., Inc.

VLRJ/cg

39

Norwood Pratt

Friday 18 April 1980

Director, BATF
Treasury Department
Washington, D.C.

Dear Sir:

I should like to urge your support for the Napa Valley Vintners & Grape Growers Association in their quest for a "Napa Valley" appellation. I should also like to point out that you will look like a fool if you deny their petition, since the name "Napa Valley" is unarguably an appellation already in the minds of even marginally sophisticated California wine buyers...and no prouder appellation exists in this state or nation. "Napa Valley" wines have been prized for their style and general superiority for at least one hundred years.

As authority for my statements, pray allow me to cite my own writings. My book, THE WINE BIBBER'S BIBLE (101 Productions: 1971 & '75--new edition in the press for '80), was one of the first nationally distributed--& widely bought--volumes to concentrate on in-depth comparisons of California varietals and growing regions. For many years, I have also been wine writer for the "California Critic: A Candid Survey of Restaurants & Wines"

新日新

In letters of G. Tang's bathub : AS THE SUN EVERY MORNING MAKES THE NEW MAKE

Robert Misch

(40)

4/17/80

BATF

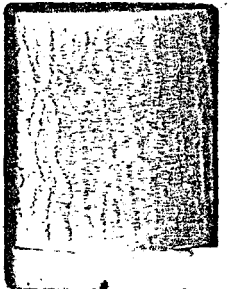
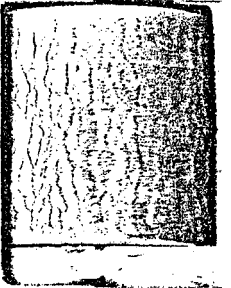
Dept. of the Treasury
Washington, D.C.

Gentlemen:

How can there be
any question: Napa Valley,
to me, and hundreds of thousands
of wine-lovers and wine aficionados,
is a self-contained unit
of California, producing peculiarly
"Napa" wines. It should be
protected; it should have its
own appellation. I hope you
will help assure that.

Very truly yours,

My credentials attached
Robert Misch
wine writer + lecturer
251 West 71st Street, New York, N.Y. 10023 (212) 595-5788



JOSEPH B. SCHILLECI
CHAIRMAN OF THE BOARD
CHARLES A. SCHILLECI
PRESIDENT
J. B. SCHILLECI, JR.
VICE PRESIDENT



P. O. BOX 2725
BIRMINGHAM, ALA. 35202

SUPREME BEVERAGE COMPANY INC.

41

April 17, 1980

Director
BATF
Dept. of the Treasury
Washington, D. C. 20004

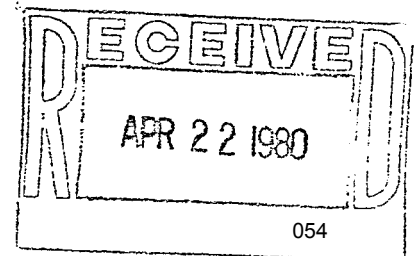
Dear Sir,

I want you to know that I support the Napa Valley Vintner
and Napa Valley Grape Grower proposal for the Napa Valley
Viticultural Area.

Sincerely,

A handwritten signature in cursive script that reads 'Louise Reid'.

Louise Reid
Supervisor
Supreme Beverage Co., Inc.



JLG CO. OF HAWAII
677 Ala Moana Blvd.
Honolulu, HI 96813

48

April 13, 1980

Director
BASF
Dept. of the Treasury
Washington D.C. 20384

Dear Sir:

As a wine distributor, predominately specializing in quality California wines, I have an interest in matters concerning the California wine industry.

Recently, it was brought to my attention that the Napa Valley Grape Growers Association and the Napa Valley Vintners have jointly proposed a boundary for the Napa Valley viticultural area.

I agree that Napa Valley should be delimited, for it has come to be recognized by the wine drinking public as a special place.

In my dealings with Napa Valley growers and wine producers, I have found them to be with rare exception a group of sincere men and women dedicated to achieving and maintaining the highest standards of wine production.

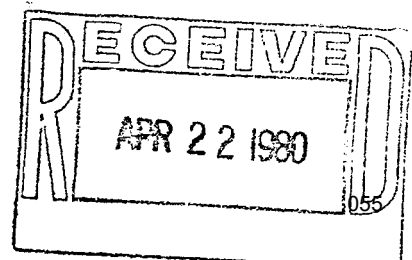
Therefore, after having studied notice number 337 in the Federal Register, Volume 45, number 53, dated Monday, March 17, 1980, I support the appellation proposal of the Napa Valley Grape Growers Association and the Napa Valley Vintners.

Sincerely,



David G. McKellar, Owner
JLG CO. OF HAWAII

lub





P.O. BOX 187, 206 SPRING STREET • QUINCY, ILLINOIS 62301
PHONE: 217/222-2348

April 16, 1980

Director
EATF
Dept. of Treasury
Washington, D.C. 20004

43

Dear Sir:

I want you to know that I support the Napa Valley Vintners and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area.

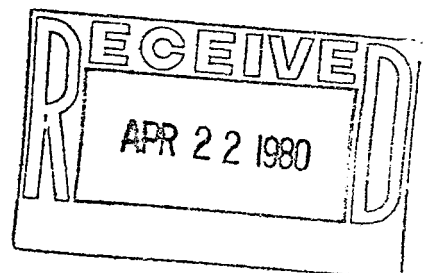
I have read their proposal and it makes sense, especially for those of us so farm from California.

Regards,

Sam Rinella

SR/nh

cc



Budweiser.

MICHELOB.

MICHELOB
Light

BUSCH

Natural⁰⁵⁶
Light

Ralph Thrift DISTRIBUTOR

1640 MAPLE • P. O. BOX 508 • NORTH BEND, OREGON 974



April 18, 1980

(NJH)

- BLITZ WEINHARD BEER
- BOHEMIAN CLUB BEER
- HENRY WEINHARD PRIVATE RESERVE BEER
- OLDE ENGLISH ALE
- FINEST IMPORTED BEERS


Director
 B.A.T.F.
 Department of Treasury
 Washington, D.C. 20220

Dear Sir:

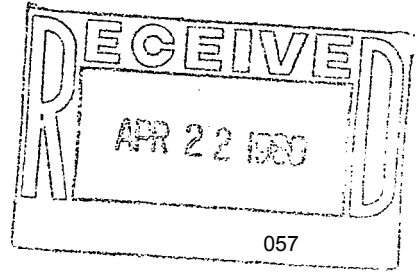
I am writing to you in reference to your agency's interest in the term "Napa Valley".

After reading the Appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners, and speaking with a few of the wine makers of the Napa Valley Wineries we represent, I am in full support of their definition.

Further, I believe the Napa Valley is recognized by our consumers as one of the most distinctive wine producing regions in the world, and that the Association of Napa Valley Growers and Vintners fairly describes and defines the area which produces wines known to come from the "Napa Valley".

Sincerely,

 Mark P. Thrift
 Vice President Wine Sales
 Ralph Thrift, Inc.

MPT:vb



WORLD'S
LARGEST
LUMBER
SHIPPING
PORT

- COLONY WINES
- PETRI WINES
- ALMADEN VINEYARDS
- MANISCHEWITZ WINES
- INGLENOOK VINEYARDS
- BEAULIEU (B.V.) VINEYARDS
- CHARLES KRUG WINES
- FRINGER VINEYARDS
- ROBERT MONDAVI VINYARDS
- LOS HERMANOS WINES
- FAMOUS IMPORTED WINES

REDWOOD VINTNERS

WHOLESALE DISTRIBUTORS AND IMPORTERS

MAIN OFFICE: 1942 FOURTH STREET • SAN RAFAEL, CALIFORNIA 94901 • (415) 453-4180

BRANCH OFFICE: 2675 CLEVELAND AVENUE • SANTA ROSA, CALIFORNIA 95401 • (707) 546-7791

April 18, 1980

Director
BATF
Department of Treasury
Washington, D. C. 20220

Dear Mr. Director:

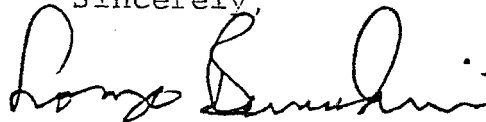
We support the joint Appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners.

We believe the Napa Valley is recognized by consumers as one of the most distinctive wine producing regions in the world and that, in our experience and judgment, the aforementioned petition fairly describes and defines the area which produces wines known as "Napa Valley."

The consumer is entitled to continue to enjoy the wines of the "Napa Valley" and to know these wines are produced from grapes grown in that valley as defined by the watershed of the Napa River.

Please give this highly-merited petition your favorable consideration.

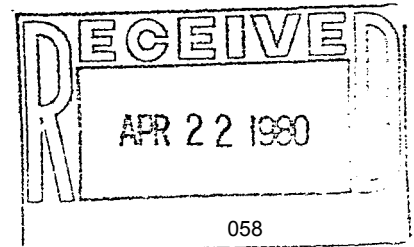
Sincerely,



Lorenzo Bernardini
Manager

LVB:np

45



46

April 18, 1980

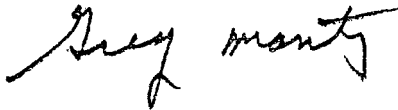
Director
Bureau of Alcohol, Tobacco & Firearms
Department of Treasury
Washington, D.C. 20004

Dear Sir:

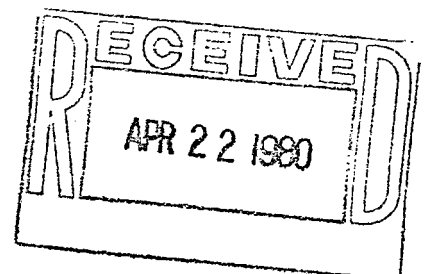
I am taking this opportunity to express my feelings on the Napa Valley Region of California. This area is in a class of its own, producing some of the greatest wines known to the industry. Nowhere else is the soil as fertile. It is God's Country.

I want you to know that I fully support the Napa Valley Vintner and Napa Valley Grape Growers proposal for the Napa Valley Viticultural Area.

Sincerely yours,



Greg Mantz
1365 Gault Way
Sparks, Nevada 89431



47

April 18, 1980

Director
Bureau of Alcohol, Tobacco & Firearms
Department of the Treasury
Washington, D.C. 20004

Dear Sir,

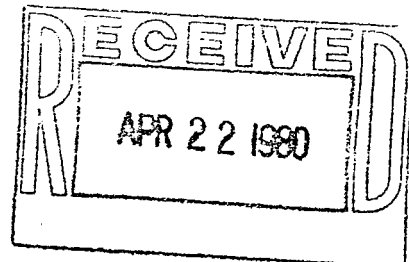
It has recently come to my attention that certain changes are being proposed in regard to Napa Valley appellation laws. I feel that Napa Valley produces many fine wines some of which come from the areas currently being questioned. I feel that these wines deserve to continue to bear the Napa Valley appellation and to change this would be detrimental to the growers and producers of Napa Valley Wines.

I want you to know that I fully support the Napa Valley Vintner and Napa Valley Grape Growers proposal for the Napa Valley Viticultural Area.

Sincerely yours,

David B. Morrison

David B. Morrison
4021 County Line Road
Carson City, Nevada 89701



48

April 17, 1980

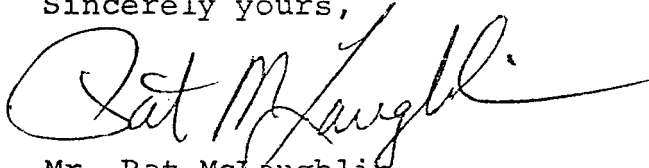
Director
Bureau of Alcohol, Tobacco & Firearms
Department of the Treasury
Washington, D.C. 20004

Dear Sir,

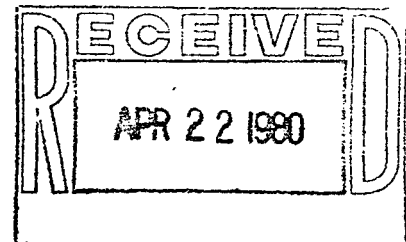
The wines produced in the Napa Valley of California are truly unique. Of all the growing regions of the state, no where else does Mother Nature combine all the elements to produce such fine wines.

I want you to know that I fully support the Napa Valley Vintner and Napa Valley Grape Growers proposal for the Napa Valley Viticultural Area.

Sincerely yours,



Mr. Pat McLaughlin
605 Cheney Street
Reno, Nevada 89502



49

April 18, 1980

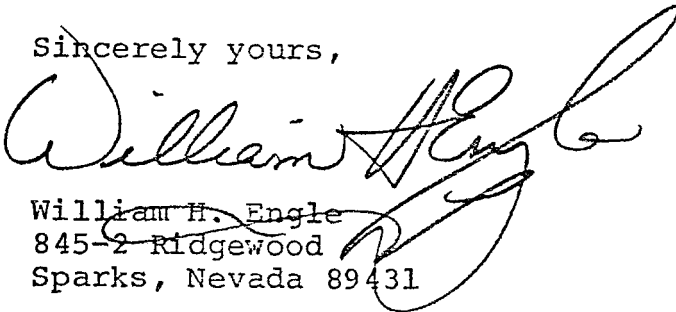
Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
Washington, D.C. 20004

Dear Sir:

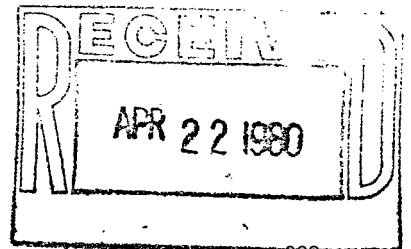
I am certain that you and your staff recognize the uniqueness of the Napa Valley of California as do I and many of my friends who enjoy the exceptional quality of the wines from this area.

In keeping with the accepted consistency of the Napa Valley area designations I wish you to know that I support fully the Napa Valley Vintner and Napa Valley Grape Growers proposal for the Napa Valley Viticultural Area.

Sincerely yours,



William H. Engle
845-2 Ridgewood
Sparks, Nevada 89431



50

April 18, 1980

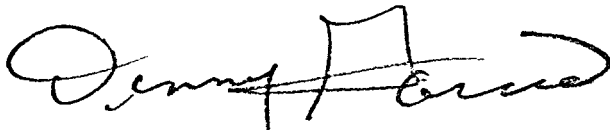
Director
Bureau of Alcohol, Tobacco & Firearms
Department of the Treasury
Washington, D.C. 20004

Dear Sir,

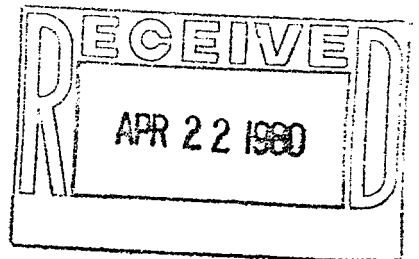
Napa Valley, without comparison, is truly one of California's finest wine growing regions.

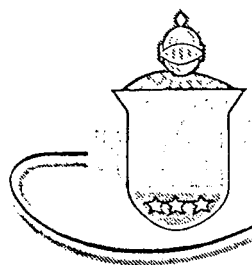
I want you to know that I support the Valley Vintner and Napa Valley Grape Growers proposal for the Napa Valley Viticultural Area.

Sincerely yours,



Denny Garcia
8685 Aquifer Way
Reno, Nevada 89506





National LIQUOR CORPORATION

1102 E. SIXTEENTH STREET

INDIANAPOLIS, INDIANA 46202

INDIANAPOLIS, INDIANA 46202

April 18, 1980

Director
B.A.T.F.
Department of the Treasury
Washington, D.C. 20004

Dear Sir:

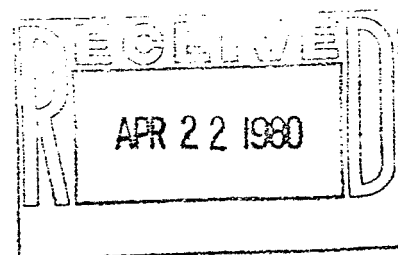
I want you to know that we at National Liquor Corporation support the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area.

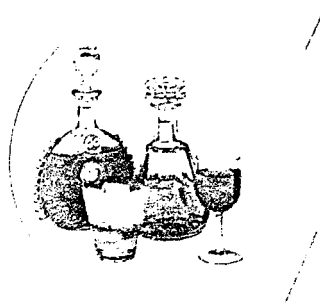
Yours truly,

Christopher J. Frayer
Christopher J. Frayer
Wine Sales Manager

(5)

CJF/sm





H.R. BURG
president

April 14, 1980

52

Chief, Regulations and Procedures Division
Bureau of Alcohol, Tobacco & Firearms
Post Office Box 385
Washington, DC 20044

Gentlemen:

I understand that hearings have been scheduled in conjunction with the establishment of the viticultural area to be designated Napa Valley.

As a wholesaler of California wines, I would like to go on record with you as supporting the Napa Valley designation as submitted in the joint proposal of the Napa Valley Grape Growers Association and the Napa Valley Vintners. I urge you to adopt their proposal as submitted.

Very sincerely yours,

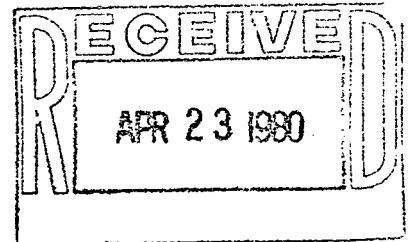
COLUMBIA DISTRIBUTING CORPORATION

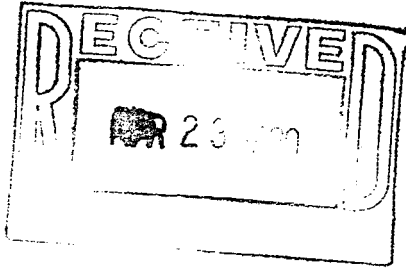
A handwritten signature in dark ink, appearing to read 'H. R. Burg', with a checkmark at the end.

H. R. Burg

HRB:cw

cc: Joseph F. Phelps





53

April 18, 1980

Director
Bureau of Alcohol, Tobacco & Firearms
Department of the Treasury
Washington, D.C. 20004

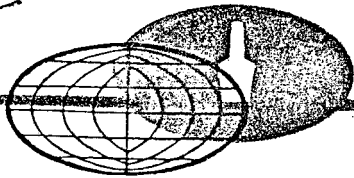
Dear Sir,

In my evaluation I believe that the wines made from the grapes grown in the Napa Valley are different in taste and quality from any other area of California.

In conjunction with this belief I want you to be aware that I am in full support of the Napa Valley Vintner and Napa Valley Grape Growers proposal for the Napa Valley Viticultural Area.

Sincerely yours,

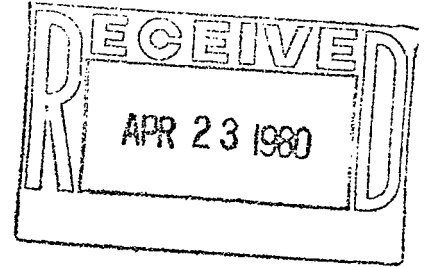
Robert J. Almo
650 Manor Drive
Reno, Nevada 89509



CONSOLIDATED DISTILLED PRODUCTS, INC.

3247 SOUTH KEDZIE AVENUE • CHICAGO, ILLINOIS 60623 • PHONE 312/254-9000

54



April 15, 1980

Chief,
Regulations and Procedures Division,
BATF
P.O. Box 385
Washington, DC 20044

Dear Sir:

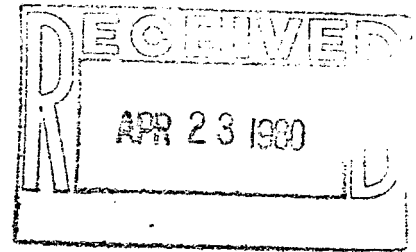
I wish to indicate my support for the joint proposal of the Napa Valley Vintners, Napa Grape Growers for the Napa Valley Viticultural area. I believe that the designation, "Napa Valley" has been historically and geographically accepted to be that area covered in their proposal.

Very truly yours,

Arnold K. Leavitt
President

AKL:dt

McKESSON
WINE & SPIRITS CO.



150 VILLANOVA DRIVE S.W., P.O. BOX 43407, ATLANTA, GEORGIA 30336 (404) 349-1400

April 15, 1980

Chief Regulations and
Procedures Division
BATF
P.O. Box 385
Washington, D. C. 20044

Dear Sirs:

I am writing to convey my support of the joint proposal submitted by the Napa Valley grape growers and Napa Valley vintners, for the establishment of the appellation of Napa Valley. This proposal has just come to my attention, and I certainly believe that the appellation is justified both historically and geographically. Further, I believe that the Napa Valley is recognized by most all consumers as one of the most distinctive wine producing regions in the world and in my judgement the said tradition defines the area which is known as Napa Valley.

The implementation of this proposal would, I believe, be of great benefit to the wine industry as well as the public at large.

Thank you for your attention in this manner.

Very truly yours,

A handwritten signature in cursive script that reads "Jerry L. Neff".

Jerry L. Neff,
Wine Sales Manager

55

JLN/br

Mrs Harold Hazelton
300 Riverside Drive
New York, N.Y. 10025
(212) 865-1749

April 16 1980

Director
BATE
Department of the Treasury
Washington D.C.

54

Dear Sir:

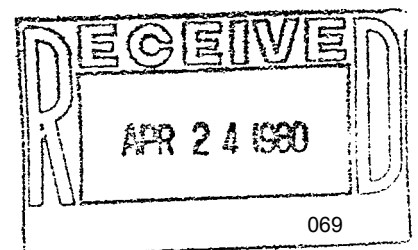
I strongly support the joint Appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners.

As a wine writer and author, as a member of the New York Wine Writers Circle and as a Contributing Editor of National Review I know that Napa Valley is recognized both here in the US and abroad as a distinctive wine producing region, possibly the best in the United States, and certainly, the best known. The proposal of both the Napa Valley Grape Growers and the Napa Valley Vintners fairly describes and defines the area that produces wines known as Napa Valley.

I know Napa Valley well and I know Napa Valley wines. I also know that people ask for Napa Valley wines specifically because they know the quality of the wines and their origin.

Let us hope that BATE will honor what is in fact already an appellation and describe Napa Valley as such.

Yours sincerely,
Nika Hazelton
Nika Hazelton



April 20, 1980

57

MR. G. R. DICKERSON, DIRECTOR
Bureau of Alcohol Tobacco and Firearms.
P. O. Box 385
Washington, D. C. 20044

ATTN: Chief, Regulations and Procedures Division.

Dear Mr. Dickerson:

The Priest Ranch Vineyard in Soda Valley has approx. 100 acres of wine grapes. The full production is being sold to Christian Bros. and bottled as Napa Valley Wines, prior years sold to Krug, Sunny St. Helena and Wheeler, all Napa Valley Vintners.

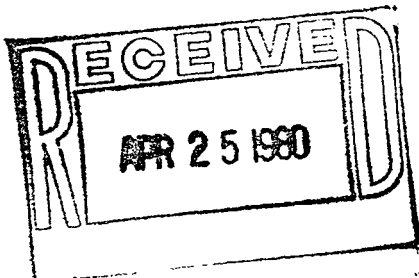
Historically the Priest Ranch has produced grapes for Napa Valley Vintners since 1900. I urge you not to take away or historically established rights as Napa Valley.

The existing Napa Valley Viticultural area includes growers in Napa County, please do not exclude us from a market we have worked so hard to help build with quality grapes.

Sincerely



Carl Rose
PRIEST RANCH
3460 E. Hwy. 128
St. Helena, Calif. 94574



Preferred Vineyard Properties, Inc.

P.O. Box 352, 2201 Main Street, St. Helena, California 94574, (707) 963-7079

April 21st, 1980

Director
B.A.T.F.
Department of the Treasury
Washington, D.C. 20225

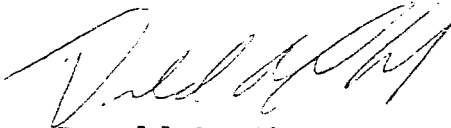
Dear Sir:

Preferred Vineyards Properties, Inc. supports the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area.

We own and lease 2305.85 acres of land within the proposed area. Please keep us current on any activity regarding the above matter.

Respectfully,

PREFERRED VINEYARD PROPERTIES, INC.



Donald A. Chase

DC/mf

58



CHATEAU MONTELENA

April 18, 1980

5a

Director
BATF
Department of the Treasury
Washington, D.C. 20004

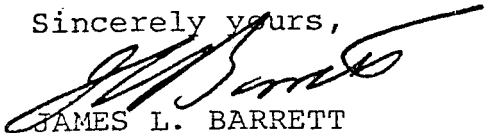
Re: Napa Valley Appellation

Dear Sir:

Chateau Montelena Winery and Vineyard supports the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area. We own and operate 100 acres of vineyard within the proposed area.

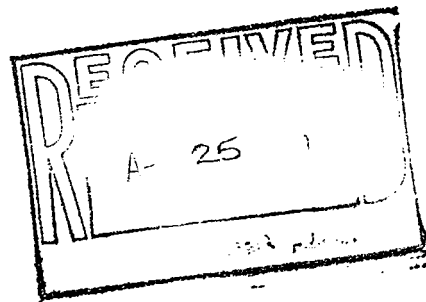
A few other comments seem in order regarding establishment of the Appellation "Napa Valley". One might puzzle over the exact location of the boundaries of the Napa Valley but not as to whether there is a Napa Valley (just as one might puzzle over the exact location of the borders of France, whose borders have been in dispute over the centuries, but never as to whether there was a country called France). The Napa Valley is not just a word used only by grape growers and winemakers; it is as firmly established as a wine "area" can be in the mind of the wine buying public. It is, after all, the consumer we are, and should be, concerned with. To this end, it is manifestly of benefit for the wine buyer to know where the wine comes from when he is considering how much to pay for a bottle of wine. The sole issue should be - does the Appellation "Napa Valley" help the consumer. The answer is yes and the wine buying public should be entitled to know whether the wine does or does not come from there. No other wine, from any other region, should be allowed to use that Appellation as it would mislead the buying public.

Sincerely yours,



JAMES L. BARRETT

JLB/v



Southern Wine and Spirits, Inc.



WHOLESALEERS AND IMPORTERS OF FINE WINES AND LIQUORS
1600 N. W. 163rd STREET • MIAMI, FLORIDA 33169 • (305) 625-4171

60

April 21, 1980

Director
B.A.T.F.
Department of Treasury
Washington, D. C.

Dear Mr. Director:

I want you to know that I support the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area.

It is my feeling that this world renowned region of wine making, known as the Napa Valley, has distinguished itself in the wine industry over the years as one of the great producers of fine quality wines.

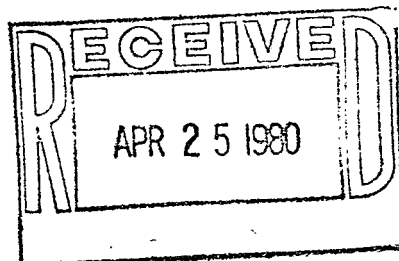
When speaking of, or making arrangements to visit, the Napa Valley, there is never any doubt as to what region I am speaking of, or its geographical location. Customers even request wines by asking for the wines of the Napa Valley. Even in the State of California, this particular region is well known to industry people and consumers alike.

I firmly believe that this area of wine growing, which has been in existence for over 100 years, and is very well known, is deserving of the recognition of an appellation, and should be honored and described as such by the BATF.

Very truly yours,

Mel Dick
President
Wine Division

MD:mnp



Beringer Vineyards

2100 MAIN STREET (BOX 111) • ST. HELENA, CA 94574 • (707) 963-7115

April 18, 1980

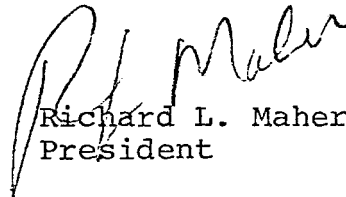
(61)

Director
BATF
Department of the Treasury
Washington, D.C.

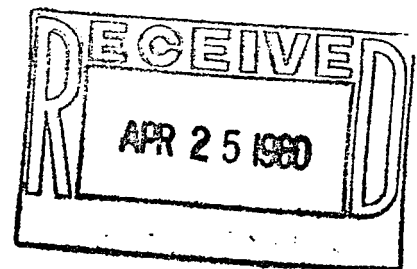
Dear Sir:

Beringer Vineyards supports the Napa Valley Vintner and Napa Valley Grape Grower proposal for the Napa Valley Viticultural Area. We farm 1597 acres of vineyard within the proposed area and also purchase grapes from other growers within this area.

Very truly yours,


Richard L. Maher
President

RLM:cd



Les Amis du Vin

"FRIENDS OF WINE"

75

Chapters In:

- Alabama
- Alaska
- Arizona
- Arkansas
- California
- Colorado
- Connecticut
- Delaware
- Florida
- Georgia
- Hawaii
- Idaho
- Illinois
- Indiana
- Kentucky
- Louisiana
- Maine
- Maryland
- Massachusetts
- Michigan
- Minnesota
- Mississippi
- Missouri
- Montana
- Nebraska
- Nevada
- New Jersey
- New York
- North Carolina
- Ohio
- Oklahoma
- Oregon
- Pennsylvania
- South Carolina
- Tennessee
- Texas
- Utah
- Virginia
- Washington
- Washington, D.C.
- West Virginia
- Wisconsin
- Wyoming
- Bahamas
- Canada
- Denmark
- England
- France
- Italy
- Japan

April 25, 1980

Director
BATF
Dept. of Treasury
Washington, DC 20220

Dear Sir,

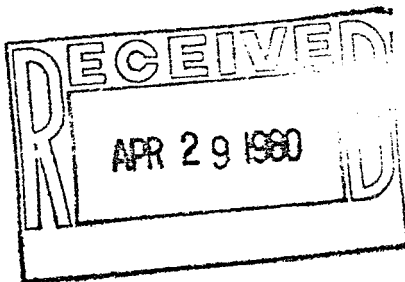
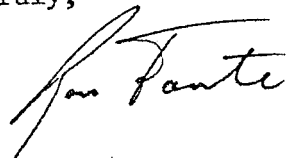
I have read with great care the petition by the Napa Valley Growers and Napa Valley Vintners for creating the appellation "Napa Valley." I have talked to numerous directors, wine shop affiliates, and consumers which represent Les Amis du Vin, the largest consumer wine society in America.

We fully endorse their petition. We definitely would assert that there is an historical and definite need for the appellation "Napa." We believe further more that the Napa Growers and Vintners associations have fairly drawn the geographical lines for Napa.

The finer distinctions can be made with time, though some are already known, such as Carneros or Spring Mountain. An analogy might be made to the Medoc, also broadly defined, but with distinct breakdowns in other appellations. Everyone knows the quality levels of a St. Julien versus a Blaye wine, but they are both "Medoc."

We sincerely hope that our considered opinion may be of help to you.

Yours truly,

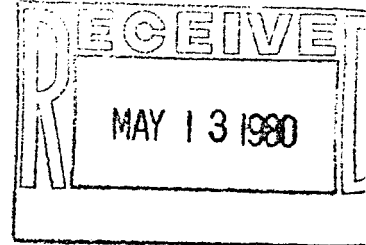


RON FONTE
President, Les Amis du Vin
Editor, The Friends of Wine Magazine

80

Niebaum-Coppola Estate

May 6, 1980



Director
BATF
Department of the Treasury
Washington, D.C.

Dear Mr. Director;

I am writing to you today as owner of 1500 acres of property in Rutherford, California, which includes a new small premium winery and 120 acres of premium wine grapes. In the capacity of grape grower and winemaker, I strongly support the Napa Valley Appellation Petition as submitted by the Napa Valley Vintners and Grape Growers.

If Napa Valley is to maintain its position as one of the finest wine producing regions of the world, it must retain sensible and logical boundaries. What could be more sensible and logical for the Bureau to define the Napa Valley Appellation as it actually is recognized by the members of the community and the thousands of visitors who tour its wineries each year. That is an appellation including the valley floor and surrounding hillsides, i.e., the valley watershed of the Napa River.

I have traveled to most wine producing regions of the world and nowhere is a wine region so obviously defined geographically as the Napa Valley. But most important, it is here in the valley floor and surrounding mountains that the smaller wineries and vineyards are located and it is they that are largely responsible for the world reputation that Napa Valley is achieving as a producer of fine wines.

I urge you to adopt the Napa Valley Appellation as the watershed of the Napa River as submitted jointly by the Vintners and Grape Growers of Napa Valley.

Sincerely,

Russ Turner for
Francis Coppola
Owner-Niebaum-Coppola Estate

84

MR. G.R. DICKERSON, DIRECTOR.
Bureau of Alcohol Tobacco and Firearms.
P.O. Box 385
Washington, D.C. 20044

ATTN: Chief, Regulations and Procedures Division.

Dear Mr. Dickerson:

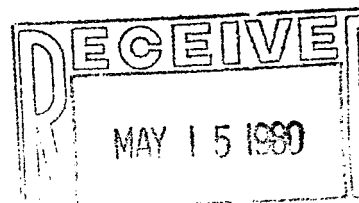
I have been a grower of wine grapes in Pope Valley since 19 67 and ~~the Pope~~ Valley has been producing wine grapes since 19 1860. The 10 acres of grapes I produce a year have been sold regularly to Napa Valley vintners and have been used to make Napa Valley wine. I am writing to urge you not to take away my historically established right to the use of the Napa Valley name. For more than one hundred years, growers throughout Napa County have participated in a single wine industry and have contributed to the fine reputation our wines enjoy nationally and internationally.

Any reduction of area from what is, in effect, an existing Napa Valley Viticultural Area would be not only unjust to those of us excluded from using the Napa Valley appellation but would be inconsistent with the historic use of the term "Napa Valley".

As an agency concerned with protecting the interests of consumers, you must surely be aware of the consumer confusion that would result from an unreasonably and arbitrarily constricted viticultural area that departed from consumers' experience accumulated over many years.

Very Truly Yours
Norman K. Blanchard

P.O. Box 45
Pope Valley, Ca.
94567



United Vintners Inc.
601 Fourth Street San Francisco, California 94107

May 5, 1980

83

Mr. G. R. Dickerson, Director
Bureau of Alcohol, Tobacco & Firearms
P.O. Box 385
Washington, DC 20044


Attn: Chief, Regulations & Procedures Division

Gentlemen:

This letter is to inform you that United Vintners' Inglenook Winery fully supports including all grapes grown in Napa County, described as the historic viticultural area, in the Napa Valley appellation. It is our understanding, based on what occurred at the hearings in Napa on April 29, 1980, that both the Napa Valley Vintners' and Napa Valley Grape Growers' Associations concur in this position.

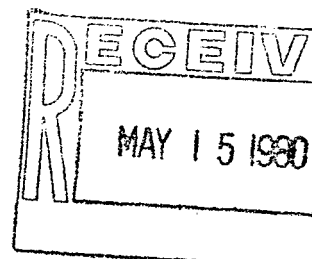
Sincerely yours,

UNITED VINTNERS, INC.

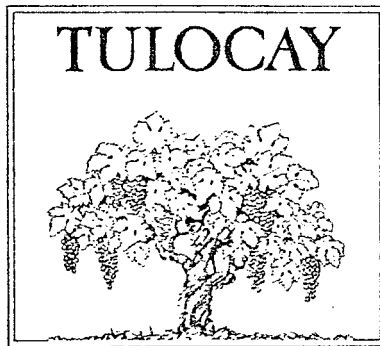

William J. Uren



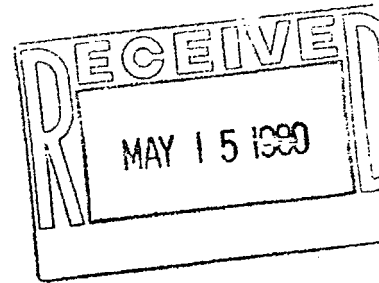
WINES GROUP



078



10 May 80



To: Chief, Regulations and Procedures Division
Bureau of Alcohol, Tobacco & Firearms
Washington DC 20044

86

Subject: Proposed rulemaking re: "Napa Valley" appellation.


Dear sir:

I write as a winemaker and consumer. I do not grow grapes. I wish to support the proposal of the Napa Valley Vintners, et al, which would define "Napa Valley" as the watershed portion of Napa County within the hills of each side of the valley. At the recent hearings here, the winemakers suddenly seemed to want "more" than the above area included; the reasons for "more" seem to add up to the conclusion that since "Napa Valley" on a label means that we can charge more for the bottle, let's call as much land as we can get away with "Napa Valley."

We winemakers have gotten into the habit of placing semi-meaningless words on winelabels. We are allowed to place business address on the label that are miles away from either the winery or the vineyard. I believe that the consumer is correct in asking for more precision in what the words mean. We should be required to make "Napa Valley" mean just what it implies: the valley, and nothing more.

Since this is the first appellation to be considered, the pressure is on you gentlemen to set some sort of precedent...if you allow winemakers to argue, as some do, that any area close by with comparable climate should be enclosed by the "Napa Valley" appellation, the whole idea of conc appellations will fall apart; what about the grower just across the Sonoma County line? He certainly has a Napa Valley climate and if Pope Valley can be called Napa Valley, why not this Sonoma grower too?

The time has come to make wine labels mean precisely what they mean.


W. C. Cadman. Winemaker & Owner. 079

CALIFORNIA STATE POLYTECHNIC UNIVERSITY POMONA

3801 West Temple Avenue

Pomona, California 91768

May 7, 1980

Director
BATF
Department of the Treasury
Washington, D.C. 20220

87

Dear Sir:

I was pleased to learn recently that the BATF is considering the joint petition of the Napa Valley Grape Growers and the Napa Valley Vintners for official recognition of the most famous wine valley in the United States as a viticultural area. Not only is the Napa Valley nationally known as the origin of many of California's best wines, the Valley has an international reputation as the source of fine wines.

I correspond frequently with friends and associates in England and in France. Much of our correspondence deals with wine (I have been teaching and writing about wine since 1966) and there are frequent references to the Napa Valley in our correspondence. On my trips to Bordeaux, I have been asked by winemakers and barrel-makers as well as people not directly involved with the wine trade, to answer questions about the Napa Valley--never simply about California wines or other viticultural areas in California. The point here is that both nationally and internationally the Napa Valley is well known as a viticultural area--indeed, as I stated at the outset, the Napa Valley is the best known wine valley in the United States.

The region which is known as the Napa Valley is also clearly defined geographically. In my wine classes, I describe the Napa Valley as extending from its southern mouth on San Pablo Bay to its northern terminus at the foot of Mount St. Helena and covering from east to west the valley floor and the slopes of the mountains on either side of the Valley to the ridge lines of these mountains which delineate the Valley. My approach to identifying the Napa Valley appears to be equivalent to that employed by the Grape Growers and Vintners in their petition to you.

To the suggestion by some commentators that the Napa Valley is too large to be accorded recognition as a viticultural area I would make two responses. First, the Napa Valley has already received recognition by wine lovers the world over. Second, the idea of the Napa Valley as a regional appellation which contains within it several sub-regions is not a unique idea. Rather, this approach is a common and commonly accepted idea in Europe. In France, for example, the Médoc includes within itself several communes (e.g., Margaux, Pauillac, St. Estephe, St Julien) each of which is entitled to its own appellation of origin. Furthermore, within each commune there are numerous châteaux, each of which may legally use the name of the château as an appellation of origin. Thus a wine might be produced anywhere within the Médoc and be labeled as a Vin de Médoc, or originate from anywhere within the commune of Pauillac and be called a Pauillac, or be named Château Mouton-Rothschild, for example, when made from grapes grown, crushed and fermented within the confines of that particular château. Similar practices have been adopted in Burgundy, especially in the identification and delimitation of single vineyards (e.g., Chambertin, Romanée-Conti).

CALIFORNIA STATE POLYTECHNIC UNIVERSITY POMONA

3801 West Temple Avenue

Pomona, California 91766

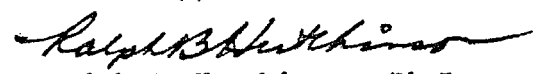
Germany has identified eleven wine producing districts; and within each district, several sub-districts (Bereich); and within sub-districts, collections of similar vineyards (Grosslagen); and frequently single vineyards (Einsellagen) are identified.

I suggest that the process of designating appellations of origin in California might be placed within a framework which logically includes the concepts of county (a political rather than a viticultural concept), viticultural district, viticultural sub-district and single vineyard. Petitions for recognition could be classified according to where they fit into the framework, which might help to eliminate some of the confusion resulting from the fact that some of the California petitions have begun at the sub-district level and some have begun at the level of the viticultural district. The Sonoma Valley and the Napa Valley petitions appear to fall neatly within this framework. The Sonoma Valley has begun at the sub-district level and the next logical progression might be to seek recognition of the single vineyards in Sonoma which are already well known as a consequence of the enological and labeling practices of one or more of the Sonoma Valley wineries. The Napa Valley which contains most of the vineyards of Napa County, includes within the Valley several vineyard sites (Grosslagen in the German terminology) such as Spring Mountain, Mount Veeder, Stag's Leap, Los Carneros, etc., for which appellations appear to be meaningful in a viticultural sense. In addition, several single vineyards (e.g., Martha's Vineyard, Fay Vineyard) already have established reputations among wine cognoscenti. I see no conflict, but rather logic, in official recognition of the Napa Valley as a viticultural area simultaneously, or sequentially, with included vineyard sites such as Los Carneros and single vineyards, such as Martha's Vineyard.

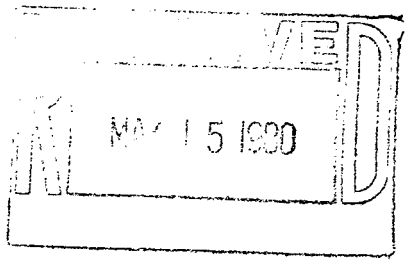
The relatively small vineyard areas within Napa County which would be excluded from the Napa Valley petition as drawn on the basis of the watershed of the Napa River, should be encouraged to seek recognition of their own appellations.

I support approval of the joint petition of the Napa Valley Grape Growers and the Napa Valley Vintners for official recognition of the Napa Valley as a viticultural area defined geographically as the watershed of the Napa River.

Sincerely,

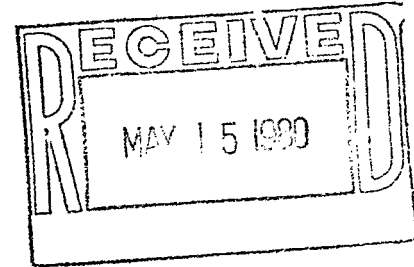


Ralph B. Hutchinson, Ph.D.
Professor of Economics
Wine Educator and Wine Writer



April 27, 1980

The Director of the
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
Washington, D.C. 20220



Dear Sir:

I write concerning the joint proposal of the Napa Valley Grape Growers Association and the Napa Valley Vintners for the establishment of an appellation area called "The Napa Valley".

There are probably several arguments which could lead me to disagree with the petitioners' proposal; but the main ones seem to deal with the size of the proposed area and the related argument of including some parcels of land that seem to me not to be directly relatable to the area generally known as the Napa Valley.

Let me deal with size first. Although Napa County comprises about 485,000 acres of land, the proposed area comprises approximately 200,000 acres, of which about 25,000 acres are planted to vineyards for wine use. This at first seems to be a great deal of acreage; and it is, if we speak of micro-climates the size of the prestigious wine areas such as Chateau Lafite or Clos Vougeot.

However, and I feel this is a big however, look at an area, a precisely delimited area within the country widely known for its precisely delimited areas--France: I speak of the wine region known as Bourgogne, or Burgundy. Here is one viticultural area that the French government recognizes as unique and distinct from all the other wine areas.

Yet this area comprises four departements--roughly and politically equivalent to our states: Yonne, Cote d'Or, Saone-et-Loire and Rhone. The exact numbers of acres covered by these departements is unknown to me (they are obtainable easily enough through the French government trade office). But I think the figure to be recognized as important here is that of the total acres planted to the vine under the recognized appellation: there are almost 92,000 acres of vines planted in these four departements. And yet they are all grouped under the one appellation--Bourgogne. This is nearly four times the acreage planted in the area known as Napa County.

And so I find myself wondering if my argument--that the proposed area is too big--holds water when I realize that one of the finest wine areas in the world has 4 times as many grapes. And realize as well that the 92,000 acres figure represents just the acreage under the appellation: there are in fact many more thousands of acres under vine not entitled to the appellation.

Now I also realize that within this large viticultural area known as Burgundy

are several sub-divisions, such as Chablis, Cote de Nuits, Cote de Beaune, Chalonnais, Maconnais and Beaujolais. And these are further sub-divided into communes or groups of communes and even further into single-vineyards. All this fine sub-division took the French many centuries of trial and error. But it all started with Bourgogne/Burgundy.

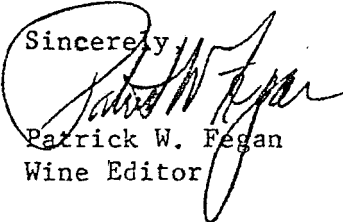
My point here is that we must start somewhere. Of course the Napa Valley is a widely recognized piece of vineland, just ask any consumer of California wine who regularly spends more than three dollars a bottle. Of course the use of the watershed scheme is valuable, for now. Later on, when we learn more about the area's specifics, we can change it....just like they do (and did) in France.

Later on, when we know more, we can begin to sub-divide into Carneros-Huichica, Calistoga, Rutherford-Oakville, etc. But let's get started somewhere! I mean, you people are the ones who ordered these changes; if you are going to balk at the definition of the most widely known wine area in the country, what will you do with "The Pinnacles"? Or "Temecula"?

The second argument deals with essentially the same problems of the first: I can find fault with a definition that includes the Chiles Valley but excludes the Pope Valley. But here I am only looking at a map: I have never been to the Pope Valley and do not know its peculiarities which might well justify its exclusion. But again, a vote has been taken and the majority of the winemakers and grapegrowers think the proposal is fine and dandy. So let's get on with the business of making America's viticultural areas a reality. Think about it. Have a glass of good wine (doesn't even have to be from the Napa Valley; get one labeled "Napa County") and think about it. And then get going. Otherwise, you'll be sifting over all the minutiae until the state falls into the Pacific.

I respectfully suggest that you accept the combined petitioner's proposal with regard to the viticultural area, the Napa Valley.

Sincerely,



Patrick W. Fegan
Wine Editor

PWF:Mpl

enclosures: information relating to my wine experiences: I may type funny but I know my field.

- I have been the wine editor for CHICAGO magazine since May of 1973. Before that time, I had spent nearly a year in France (1971-1972) --working the harvest in Bourgogne, pruning vines in Provence, laboring in the caves, working in the retail trade in Paris (Caves de la Madeleine), and studying in the wine libraries of that city. In addition, I attended the Cours d'Oenologie at the Universite' de Bordeaux a Talence as well as apprenticed to M. Steven Spurrier, now famous for his having assembled the wines for and conducted the celebrated "California-France" taste off.
- Since my return from "in the field" duties, I have toured the vineyards and interviewed the winegrowers in Jerez, Spain (1975), Australia (1976), northern Italy (1977) and France (1974 --for a brush-up). I also regularly visit the wine regions of the United States, particularly those of New York State and California.
- I teach several courses on wine and wine appreciation on a regular basis. Such classes have included accredited courses at TRITON Community College (River Grove, Illinois) as well as sessions at the Central YMCA, here in Chicago. I am also a founding member, as well as a participant on the Membership Committee, of the newly-organized SOCIETY OF WINE EDUCATORS.
- For the last five years I have been involved with the problems of labeling American wines, trying to make sense of them to my readership --both locally and nationally-- and to my students. To that end, I have written articles in CHICAGO, the CHICAGO SUN-TIMES and elsewhere concerning these problems and have offered suggestions for the future of wine regulations. Also, I have presented testimony --both verbal and written-- before the Bureau of Alcohol, Tobacco and Firearms (B.A.T.F., the regulatory body with control over the wine industry) in Washington, D.C.
- I have completed work on a book (together with J. Philip Graham) entitled (at the moment) The Wine Label Collector's Album; it is a work dealing with the guarantees and foibles of the wine labels which grace our wines.
- Most recently, I have been selected to write a regular wine column for the daily CHICAGO SUN-TIMES. My articles appear every other Monday in their food section.
- I am a Political Science graduate (B.A.) of the University of Illinois at Chicago Circle Campus. I am thirty two, single, and have a perfectly functional liver and kidney.

Patrick W. Fegan
WINDY CITY TASTERS' UNION *
1421 West Addison Street
Chicago, Illinois 60613
(312) 871-7231 (Home)

975-0560

Patrick W. Fegan
CHICAGO MAGAZINE
500 North Michigan Avenue
Chicago, Illinois 60611
(312) 751-7150

*a registered trademark

April 30, 1980

San Francisco

90

Director
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 385
Washington, d.C.

Dear sirs,

As a man who drinks a little bit of wine, I was interested enough to drive up to Napa the other day to sit in on your little dog and pony show about making the Napa Valley into a genuine appellation of origin.

If you guys fold up in front of the babble you got from either one of those outfits, I'm going to give up and drink beer. All they could do was to cancel each other out because neither one wants to get a tight hold on the simple truth of things.

I had a minute of nope when somebody said right off that a valley was a valley and you could look it up in Webster, but the next thing I know they're dragging in places that don't have a damned thing to do with the Napa Valley except their used water passes through. Is Missoula, Mont., a suburb of New Orleans because the Missouri finally empties into the gulf? The sharpie lawyer for the hinterlands asked the same question, and I hope you guys are still asking it yourselves.

Don't get me wrong about the lawyer. He was only as honest as a lawyer can afford to be. Just for openers, he called the opposition for using a book without mentioning what it really was on his side. I looked. He read half a sentence. What he said was, "From a viticultural point of view Napa County and Napa Valley are interchangeable terms." What the book says is, "From a viticultural point of view Napa County and Napa Valley are interchangeable terms, for it is from the valley and its bordering hillsides that the county's famed wines originate." There is a mountain of difference there. I read the whole rest of the book, and as near as I can make out the guy who wrote it never knew there was a grapevine east of Souverain back when it was Lee Stewart's place. At least he never mentions one. And take the guy named Lider. He gets in the chair and says there isn't any difference between Rutherford and Wooden Valley, wherever the hell that is. Well, the name rang a bell. If you want to take a look in Hugh Johnson's Atlas, you will see he is the guy who turned out the maps to show "The Quality Factor" in the Napa Valley, and those maps don't go anywhere near the east side of the county. In fact, I don't think they go as far as Chiles Valley, which they shouldn't.

Now that you're not getting me wrong about the lawyer and his bunch, don't get me wrong about the other guys, either.

RECEIVED
MAY 15 1980

p.t.o

The one named Thompson gets in there and tells you to look at where the wineries are. What the hell difference does that make? You can put a winery anywhere. The Portuguese got theirs 50 miles from the nearest vineyard. The Germans have theirs right downtown. So do the Burgundians. What matters is where the vineyards grow that make the wines people give a damn about.

All the rest of the flapdoodle about degree days this and rainfall that just don't make the case either way, and soda water and wheat and telephone books sure as hell don't.

What you want to do if you are going to regulate is to find out where the wines come from that really excite people, and start drawing lines around where they came from, and let the rest fill in the cracks the best they can.

If the Napa Valley really is someplace, you ought to be able to get a line around it without any more of the guff you took at the meeting.

Sincerely,
Ed Murray

p.s. I didn't come back for the second day. The first one was a waste of too much time.



93

Rancho Chimiles

May 13, 1980

Mr. G.R. Dickerson, Director
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 385
Washington, D.C. 20044

Dear Mr. Dickerson:

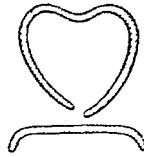
I am writing with regard to the "Napa Valley" viticultural appellation which the BATF is currently working to define. This is a matter which will have direct bearing on my life's work to date, in the future, and on the lives of my children.

My wife and I own and operate an 1100 acre ranch in the Wooden and Gordon Valleys of Napa County. The bulk of this acreage is used for rangeland, but 45 acres in Wooden Valley have been planted to premium wine grapes. These vineyards are near the Wooden Valley School, approximately four miles northeast of the City of Napa.

We planted the first 10 acres of Gamay in 1972, when we were 24 years old. After discussing contracts with several Napa Valley wineries, we sold our first small crop in 1974 to Stag's Leap Wine Cellars; the Gamay grapes were blended with Pinot Noir to produce a Gamay Beaujolais which became an instant success for the winery. We continued to sell these grapes to Stag's Leap through 1977, averaging an 11% quality bonus per year above the Napa Valley base price for Gamay. The managing partner and winemaker at Stag's Leap, Mr. Warren Winiarski, reported to me that the wine critic for the New York Times called this wine the definitive California Gamay Beaujolais and stocked it exclusively in his personal cellar.

In 1978, we began preparing 35 acres adjacent to the Gamay for planting to Zinfandel and Sauvignon Blanc. During this time we also made long term arrangements for the delivery of our entire production to the Charles Krug Winery, the oldest in the Napa Valley. The grape buyer for Krug, Mr. Fred Berry, had long and favorable experience with grapes grown in Wooden and Gordon Valleys; and had no reservations about the quality possible from these areas. The first crop we delivered to Krug, in 1978, bore out Mr. Berry's faith, earning the maximum bonus paid by the winery (20%) for sugar at 23.8° brix and total acid at .80.

The reason for the success of our vineyard lies in the combination of soils and climate present in Wooden Valley and typical of the area which has traditionally produced "Napa Valley" wines. Wooden Valley has a floor approximately one mile



Rancho Chimiles

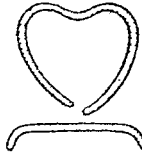
Page Two

in width and two miles long ranging in elevation from roughly 500 to 700 feet above sea level. A ridge of hills averaging 1100 feet above sea level surrounds this tiny valley. The soils on the valley floor are of the Bale-Cole-Yolo series typical of the Napa Valley and considered by many to be among the most favorable for growing varietal grapes. For example, the specific soil of our Gamay and Zinfandel vineyards is one of the most common in the Rutherford area (soil no. 170, Soil Survey of Napa County, California, USDA Soil Conservation Service).

Climate is an even more important factor in growing the grapes that have won Napa Valley wines worldwide recognition. The various microclimates of the Napa Valley are generally defined by their proximity to the San Pablo Bay; the coolest area being the Carneros region in the south near the bay shore, and the warmest area being the Calistoga-Pope Valley area to the north. This range of microclimates allows Napa Valley growers to find optimal climatic conditions for the range of premium wine grapes we grow. Wooden Valley is approximately the same distance from the bay as Yountville on the Napa Valley floor. Much as the Yountville hills tend to block fog from extending north to Oakville and Rutherford the Napa hills inhibit the movement of fog into Wooden Valley. Typically, when fog is present in the area, it fills the lower end of the Napa Valley proper and spills over into Wooden Valley in a great wave which battles the morning sun for a few hours and retreats. The cooling influence of the marine air, so important to wine quality, is very pronounced in Wooden Valley. In fact, a small area in the northwest corner of Wooden Valley is known as "Windy Flat" due to the flow pattern of this cool air mass being channelled through a small saddle in the hills. The enclosed "History of Wooden Valley" includes a photograph of Windy Flat, taken in 1894, which clearly shows a well-established vineyard on the hillside.

Farmers in Wooden Valley have grown grapes for Napa Valley wine for a long, long time. I personally know men in their seventies today whose fathers grew Zinfandel here and hauled the grapes into Napa wineries by mule team over a treacherous route. The wineries have traditionally and with good reason been established in the major towns of the county, along the railroad lines and major highways. There has never been any question that the eastern valleys were part of the Napa Valley. I was a charter member of the Napa Valley Grape Growers Association. The proposed "Napa Valley" viticultural zone should be left intact and historically valid. I attended the BATF hearings in Napa recently and did not hear or see any evidence which would indicate a need to reduce the Napa Valley to an area less than that which has been known historically and currently. The consequence of such action would be to drive up the price of Napa Valley wines by restricting supply. In the process, the Constitutional rights of many hard working people would be trampled on.

The Napa Valley wine industry has attained a position of leadership through the efforts of all the growers and vintners in Napa County. The area of the County not suitable for wine grapes, located north and east of Lake Berryessa, has never been a factor and could easily be excluded from the Napa Valley appella-



Rancho Chimiles

Page Three

I am enclosing a copy of a special supplement to the Napa Register published in April 1980 which clearly shows current usage of the name "Napa Valley" to include Wooden Valley.

Also enclosed is a sample label which I saved to recall our first harvest in 1974. The field where these grapes were grown was a vineyard in 1917 when my next-door-neighbor, Lilburn Clark, first came to Wooden Valley.

In conclusion, I would like to point out that the Napa River "watershed" viticultural area proposed by the Napa Valley Grape Growers Association was never debated or discussed before the general membership of the Association. The six directors mailed out a ballot to the membership on November 15, 1978, which provided only one choice (the watershed), and a recommendation that members vote for that choice. Since a large majority of the member vineyards were within the watershed, most growers did as they were told without having considered the long range effects of such action. At the Nov. 27 meeting of the Association, those growers who opposed the unfair exclusion of vineyards beyond the Napa River watershed argued in vain, due to the fact that the bulk of the ballots had already been mailed in during the previous week. I am enclosing a copy of the ballot. (Please excuse its condition.) The Directors continually stressed their opinion that there was no time available for thoughtful examination of this extremely important issue, called for a motion to cut off discussion on the matter, and moved on to reporting on a hospital fund raising drive. The manner in which this matter was handled by the Directors of NVGGA shows an obvious lack of ethical, democratic procedures, as well as a callous and arrogant disregard for the reality of history, geography, and human effort.

Thank you for your careful consideration of this issue.

Sincerely,

Terrence G. Wilson

44
BASS/FRANCIS PRODUCTIONS
767 NORTH POINT
SAN FRANCISCO, CA 94109
(415) 441-4555

May 12, 1980

B.A.T.F.
Regulations and Procedures
Division
P.O. Box 385
Washington, D.C. 20044

Dear Sir,

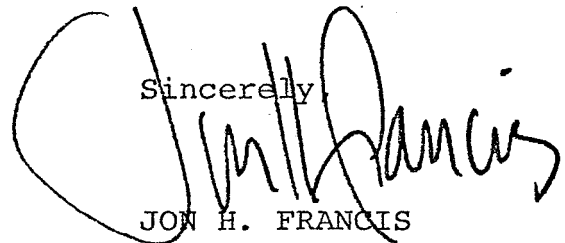
I strongly support an appellation of origin for Napa Valley grapes and wine. The growers, wine makers and, most importantly, the consumer will benefit from a clear concise definition of what goes into a bottle of wine.

I feel that all wine grape growing areas of the Napa Valley should be included in the appellation with no artificial boundaries. I am especially referring to the southern area of the valley (south of the Soscol ridge and east of the Carneros vineyard region) that has a history of being a fine fertile area for vineyards and orchards.

I am now in the process of re-establishing a vineyard in this perfect region I area and I have received very strong support and encouragement from county agricultural officials and local vineyard experts that this area promises to be of the highest quality for which the Napa Valley is famous.

I urge you to include this area and all other vineyards of the Napa Valley in appellation of origin for this outstanding wine making region.

Sincerely,



JON H. FRANCIS

JF/iaf

MAY 21 1980

Narsai's Restaurant

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May 14, 1980

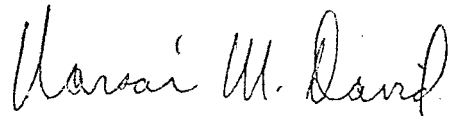
MR. G.R. DICKERSON, Director
Bureau of Alcohol, Tobacco, and Firearms
P.O. Box 385
Washington, D.C. 20044

Attn: Chief, Regulations and Procedures Division

As the owner of Narsai's Restaurant in Berkeley, California, I have had the opportunity to become very familiar with the "Napa Valley" and the wines that have made it justly famous. Narsai's is located less than an hour's drive from Napa and, because I have made a point of establishing a well-stocked wine-cellar, that proximity has been especially valuable.

My clientele has always recognized "Napa Valley" as an appellation indicative of high quality and distinctive style. Demand for Napa Valley wine is strong and will continue to be strong given whatever boundaries BATF might designate. However, an area smaller than that presently in existence would constrict supply, driving prices up unnecessarily, and would limit vintner flexibility, potentially driving quality down.

The fact that Napa Valley's reputation has been earned with Napa County's grapes clearly demonstrates that the eastern valleys produce "Napa Valley" quality grapes. In designating a future Napa Valley viticultural area, BATF ought to take into account the past and present meaning of the appellation.



Narsai M. David
President

MAY 21 1980

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Bob Thompson

1476 Kearney Street · St. Helena, California 94574 · 707-963-3992

12 May 1980

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

MAY 21 1980

Dear Sir,

I testified on behalf of the Napa Valley Vintners and Napa Valley Grapegrowers in favor of their proposal to make the Napa River watershed a viticultural area. I did so in belief that the proposal was a fair one and helpful to consumers. I do not believe that the proposed eastward extension is valid, and so—speaking as an individual consumer—urge you to limit the viticultural area to the watershed. My reasons are simple.

The word "valley" has a well understood definition met by the watershed proposal but violated by the eastward extension. Many future hearings (Sonoma Valley, Alexander Valley, Dry Creek Valley, Santa Ynez Valley, Livermore Valley, and more) will depend very substantially on a correct definition of the word; Napa should not be an exception or a misleading model.

Second, the true fame of the Napa Valley comes from vineyards within the watershed; none of its true fame comes from those without. Any reading of the literature of California wine will bear this out, as will any perusal of results from highly publicized tasting competitions.

I cannot think of any valid arguments that should outweigh these fundamental truths. Meantime, most points advanced by proponents of the eastward expansion demand serious questioning.

The contention that east county grapes are part of the fame of the valley was not shown. True, they are part of the volume, as was shown, but grapes from every part of the state can be and have been part of the volume of Napa Valley wines under the regulations as written.

It was argued that failure to include east county grapes in the Napa Valley appellation would lead to increased scarcity of Napa Valley wines in a time of scarcity. Aside from the fact that there will be a scarcity someday no matter where the lines fall, there was no demonstration of scarcity. I do not think a scarcity can be demonstrated as a general proposition. Acreage on the valley floor alone now exceeds the total county acreage

Appendix

Grape acreage in Napa County (bearing)

1972	12,524
1973	13,139
1974	14,070
1975	15,725
1976	17,584
1977	20,816
1978	22,546
1979	22,456

Average grower returns in Napa County for major varieties

Year	Cabernet S.	Pinot Noir	Zinfandel	Chardonnay	Chenin B
1973	\$862.	\$870.50	\$528.	\$909.50	\$492.
1974	459.50	475.70	299.90	541.30	*
1975	325.60	320.40	261.60	398.80	*
1976	460.78	387.97	398.22	560.78	342.
1977	603.42	488.66	527.16	835.39	584.
1978	533.22	437.72	540.62	896.50	601.
1979	538.33	459.27	527.22	977.53	570.

Sources: Napa County Agricultural Commission and California Crop & Livestock Reporting Service.

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MR. G. R. DICKERSON, DIRECTOR.
Bureau of Alcohol Tobacco and Firearms
P. O. Box 385
Washington, D.C. 20044

ATTN: Chief, Regulations and Procedures Division.

Dear Mr. Dickerson:

The Roy Pridmore family wishes to add their request to the many others you have received. And that is that you not take away our historically established right to the use of the "Napa Valley" on wines made from grapes grown in our Capell Valley.

Capell Valley is one of the smaller valleys on the eastern slope of Napa County near Lake Berryessa. Our family has lived here over fifty years and although we did not produce grapes our neighbors did.

The Pare family, one of the original old time residents sold their grapes to the Migliavacca Winery in Napa for years. They were used in some of the original Napa Valley Wines. In talking with Mary Pare Westfall this was a major part of their income in the early 1920's. The grapes were hauled in boxes and then later in the 30's they used redwood tanks similar to water tanks mounted on trucks to transport them to Napa to the winery.

It would be very unjust to exclude all of us from using the Napa Valley appellation from what has historically been consistantly an existing "Napa Valley Viticultural Area", for many many years.

We hope you will give us your very serious consideration in the matter.

Sincerely,
Roy Pridmore
Roy Pridmore and Sons.

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Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
Washington, D. C. 20226

MAY 20

Dear Sir:

This letter is a follow up to my testimony given April 29th at the
Holiday Inn in Napa.

I particularly object to the Southern Appellation boundary as proposed
by the Napa Valley Vintners and others. This boundary running east
and west along the Soscol Ridge excludes an area lying just to the south,
that in my opinion is particularly suited to plantings of Chardonnay,
Gurwurtraminer, Pinot Blanc, Pinot Noir and possibly Sauvignon Blanc.

The climate is a Region I. There are significant areas of Bale,
Coombsville and Haire soils suitable, even desirable for vineyard.
Enclosed is a copy of a soil map with suitable soils outlined. The close
proximity of the Napa River and San Pablo Bay minimize the danger of frost.

This area has an historical basis as a good site. I quote from a Calif-
ornia State Agricultural Society Pamphlet dated 1858.

"By far, the most important farm in the valley was the Suscol farm near
Suscol. The farm consisted of 225 acres of orchard and vineyard. The
most important aspect of this farm was the successful growing of orchards
without irrigation, a matter considered impossible by most Napa Valley
Farmers."

In light of the above, I have purchased some of this land and intend to
plant grapes. In talking with the wineries as potential buyers of these

grapes, I have received much interest. Also, I have talked to Keith Bowers, a Napa County Farm Advisor, and he also has been very positive in his encouragement.

I strongly urge you to include this area in the Napa Valley Appellation.

Sincerely,

Kinbal Griggs Giles

1170 Castle Road
Sonoma, California 95476

EDWARD J. WAWSZKIEWICZ, PH. D.
Associate Professor of Microbiology

University address:
(for informational purposes only)

99

School of Basic Medical Sciences
Department of Microbiology and Immunology
University of Illinois at the Medical Center, Chicago
835 South Wolcott Avenue, Chicago, Illinois
P. O. Box 6998, Chicago, Illinois 60680
Tel. (312) 996-7470

May 15, 1980

Mr. G. R. Dickerson
Director
Bureau of Alcohol, Tobacco and Firearms
P. O. Box 385
Washington, D. C. 20044

Dear Mr. Dickerson:

Re: Notice 337, Napa Valley

The definition of the boundaries of the Napa Valley viticultural area is important for several reasons. I need not tell you that the Napa Valley is probably the most well known of our better quality wine growing areas. Its boundaries, as a wine growing region, therefore, need to be rationally defined, both for enological and for wine labeling purposes. Moreover, the considerations which will govern how these boundaries will be defined are important not only for the sake of the wines of the area (and their growers, producers and consumers), but in terms of the precedents which may be set in this case and then applied with respect to the definition of the boundaries of other viticultural areas.

Let me elaborate.

In the case of the Napa Valley we are dealing with a geographical area which consists of a flatland surrounded on three sides with mountains, an area drained by the Napa River and its tributaries. This flat area corresponds classically to what in the English language is called a valley. I have consulted two current dictionaries as to the definition of the word valley and this is what I have found as primary definition of the word:

1. An elongated lowland between ranges of mountains or hills, or other uplands, often having a river or stream running along the bottom. (*The American Heritage Dictionary of the English Language*, William Morris, ed., American Heritage Publishing Co. & Houghton Mifflin Co., Boston, 1970)

Mr. G. R. Dickerson
May 15, 1980
Page 2

1. An elongate depression of the earth's surface, usually between ranges... of hills or mountains. (*Webster's Seventh New Collegiate Dictionary*, G. C. Merriam Co., Springfield, Mass., 1965)

Following these definitions, on the accompanying topographical map I have indicated in green the 400-foot elevation limit to Napa Valley. You will note that this U. S. G. S. map even indicates this area by the name in question. I believe that the winegrowing area enclosed within this green demarcation line, AND NO OTHER, should be officially known as Napa Valley, for viticultural and Bureau purposes. Although I believe that an excellent case can already be made for subdividing this area for labeling purposes, particularly with respect to the Carneros Valley region (shown demarcated in red) because of the distinctive wines grown there, as the Bureau may not be prepared to cope with subdivisions at this time, and as the Carneros district may not be scheduled for separate consideration during the present rulemaking, I will withhold further comment about it.

My main concern here is to call your attention to the considerable winegrowing area between the 400-foot elevation, which I indicate as the demarcation boundary I propose for the Napa Valley viticultural area itself, and the line drawn in brown on the map, that being the approximate boundary of the Napa River watershed. It can be argued that, because a secondary definition of the word valley is:

2. The extensive land area drained or irrigated by a river system. (*American Heritage Dictionary of the English Language*)

2. An area drained by a river and its tributaries. (*Webster's Seventh New Collegiate Dictionary*)

the entire area within the brown line, i. e. the entire watershed, should be known as Napa Valley. I believe this is the position advanced by the petitioner mentioned in this notice. I am strongly opposed to it. While I am well aware that wines grown in the mountain belt around Napa Valley itself have in the past gone to market as Napa Valley wines, I believe that a long-needed improvement in this state of affairs is in order. I believe that wines originating entirely from the area surrounded by my green line on the map should be permitted to go to market with the Napa Valley appellation. But I think that those originating entirely from vineyards above 400 feet elevation, located in the region between my green line and the brown line, should be permitted to go to market carrying another, and to the consumer extremely informative appellation, namely Napa Mountain

Why do I insist on this? For two reasons, one purely semantic (but with important legal ramifications), and the other enological.

I will take up the semantic question first. When consumers speak of Napa Valley they are talking about a real valley, not mountains that may be over 2000 feet high. My dictionaries tell me that mountains and valleys are mutually exclusive, the word mountain being defined thusly:

Mr. G. R. Dickerson
May 15, 1980
Page 3

1. A natural elevation of the earth's surface, having considerable mass, generally steep sides, and a greater height than a hill. (*American Heritage Dictionary of the English Language*)

1. A land mass that projects conspicuously above its surroundings and is higher than a hill. (*Webster's Seventh New Collegiate Dictionary*)

It follows, therefore, that were a wine grown in a vineyard in the Napa River watershed, on a mountain, say 2000 feet high, and it were to go to market by Bureau ruling as Napa Valley wine, consumers would surely be confused, being misled into thinking that the wine actually originated in the valley. As you know, the Bureau does not have the right to stand the dictionary on its head, it is not permitted to make rules which result in misleading labels, and if it chooses to redefine words in common parlance that appear on winelabels it must make its peculiar definitions clear to unsuspecting consumers (cf. the ruling of Judge Gesell in the case *Wawszkiewicz et al. v. U. S. Treasury Department et al.*). Thus, I believe that if Napa Mountain wines are forced to go to market as Napa Valley wines, at the minimum an explanation to the effect that as far as the Bureau is concerned the word valley is equivalent to the word mountain, and as such has no meaning, would have to be given somewhere on the label. This *reductio ad absurdum* would surely undermine the whole idea behind appellations of origin and should obviously be avoided. This can easily be done by the adoption of the Napa Mountain appellation which I propose.

Leaving aside the semantic and legal matters just mentioned, there is, of course, an overwhelming scientific reason why we should have both Napa Valley and Napa Mountain appellations. Anyone who has studied plant ecology knows that the elevation of a land mass brings to the land mass, at various heights, characteristic and important changes in microclimate - that are reflected, for anyone to see with the naked eye, in the native vegetation present, and in the character of the growth of the vegetation we ourselves introduce. These changes in microenvironment can exert profound effects on the growth and ripening of grapes and, consequently, on the character of the wines produced therefrom. When I write this to you, Mr. Dickerson, I am not quoting from some textbook that I read a long time ago, now gathering dust on my shelves, but I am speaking from my own first-hand knowledge, having had experience with grapes of the same variety grown but a couple of miles away from each other, some of them grown on a mountain at about 1900 feet, the others in the valley below, at perhaps 50 feet elevation. Even though the grapes were of the same variety their chemical constitution was vastly different, and they yielded predictably different wines. The Bureau will be making a great enological mistake if it does not recognize these facts of geology and biology. Valleys are not mountains, and mountains are not valleys - and grapes, even if of the same variety, grown in the one environment are not the same as those grown in the other.

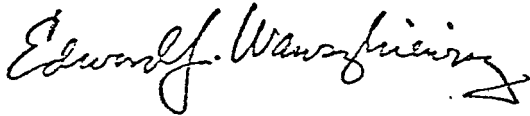
In conclusion, my proposal is that there should be at least two viticultural area appellations for the Napa River watershed at this time, Napa Valley and

Mr. G. R. Dickerson
May 15, 1980
Page 4

Napa Mountain.

Under no circumstances should wine originating from grapes grown outside the watershed area (e. g. east of it) be permitted to be labeled by either appellation.

Yours sincerely,

A handwritten signature in cursive script, reading "Edward W. Wainwright". The signature is written in dark ink and is positioned below the typed name "Dr. Ed".

Dr. Ed

enc.: U. S. G. S. map

FOREMAN, DYESS, PREWETT, ROSENBERG & HENDERSON

ATTORNEYS AND COUNSELORS AT LAW

1300 19TH STREET, N. W.

SUITE 350

WASHINGTON, D. C. 20036

202/466-7610

WILLIAM F. DEMAREST, JR.
PARTNER

May 16, 1980

2900 ENTEX BUILDING
HOUSTON, TEXAS 77002
713/658-8500
TELEX 79-0207

100

Director
Bureau of Alcohol, Tobacco
and Firearms
Post Office Box 385
Washington, D.C. 20044

Re: Notice No. 337 Designation of the
Napa Valley Viticultural Area

Gentlemen:

Enclosed are two copies of written comments submitted on behalf of the proponents of a Napa Valley Historic Viticultural Area. This group is comprised of various grape growers, vintners, wholesalers, retailers and wine consumers who advocate the inclusion of several eastern Napa County valleys in the proposed Napa Valley Viticultural Area.

Any questions concerning these comments should be directed to:

Mr. William F. Demarest, Jr.
Foreman, Dyess, Prewett, Rosenberg & Henderson
1300 - 19th Street, N.W.
Washington, D.C. 20006
(202)466-7610

or

Mr. Rod Freebairn-Smith
Freebairn-Smith & Associates
300 Broadway
San Francisco, California 94133
(415) 398-4094

Sincerely,


William F. Demarest, Jr.

Enclosures

FOREMAN, DYESS, PREWETT, ROSENBERG & HENDERSON

ATTORNEYS AND COUNSELORS AT LAW

1300 19TH STREET, N. W.

SUITE 350

WASHINGTON, D. C. 20036

202/466-7610

2900 ENTEX BUILDING

HOUSTON, TEXAS 77002

713/658-8500

TELEX 79-0207

WILLIAM F. DEMAREST, JR.
PARTNER

COMMENTS OF THE PROPONENTS OF THE
NAPA VALLEY HISTORIC VITICULTURAL AREA

May 16, 1980

These comments are presented on behalf of an ad hoc association of the grape growers, wine distributors and marketers, and wine consumers who advocate inclusion of certain eastern valleys of Napa County in the proposed Napa Valley Viticultural Area. The viticultural area proposed by this group is sometimes referred to as the Napa Valley Historic Viticultural Area because it includes all the valleys in Napa County which have historically produced grapes from which "Napa Valley" wines have been made. Several of these valleys are viticulturally similar to the Napa Valley proper, but, because they do not fall within the watershed of the Napa River, were excluded from the viticultural area proposed in the petition currently pending before the Bureau of Alcohol, Tobacco and Firearms (BATF).

At the April 28-29, 1980, hearings held by BATF in Napa City, California, we presented twenty witnesses and over five hours of testimony in support of our proposal. These written comments will parallel the oral presentation made at the hearings; however, because the hearing transcript is not yet available, citation to the transcript is not possible.

Also included with these comments are copies of the maps used by our witnesses to illustrate their testimony. The six maps listed below are 8-1/2" x 11" copies of larger maps which have been reduced for BATF's convenience:

1. Boundaries of the proposed historic viticultural area;

2. Regional soil types and temperatures of Napa County and the surrounding counties;
3. Napa County soils, highlighting the Napa River watershed and eastern valleys;
4. Napa County climate conditions, showing temperature and rainfall variations;
5. Historical wine producing area, outlining grape-growing areas of the nineteenth and twentieth centuries which are known to have supplied grapes for Napa Valley wineries; and
6. Scale comparisons of land areas, comparing the viticultural districts of France to Napa County.

In addition, we are including a slope map of Napa County similar to that used at the BATF hearing and request that it be made a part of the record. Finally, at the hearing we presented to BATF a composite map made up of United States Geological Survey (USGS) 7.5 minute series quadrant maps, as required by BATF regulations. If this map has not already been made a part of the record, we ask that it be so included.

I. Introduction and Overview

By way of background, the eastern valley growers have wrestled long and hard with the at time conflicting standards for delineating an American viticultural area as set forth in the BATF's regulations. As we interpret these regulations, the BATF's objective appears to be to establish a viticultural area based upon viticulturally significant characteristics. For reasons of administrability, however, the BATF's regulations require that the specific boundaries of a viticultural area appear on a USGS map. Thus, an immediate conflict is likely to exist -- many viticulturally significant factors, e.g., soil types, temperature and rainfall patterns, etc., do not always limit themselves to geographic features appearing on USGS maps. Additionally, the BATF's regulations properly require that a viticultural area be currently or historically recognized as such. We believe this requirement to be most important to protection of the interests of the ordinary wine consumer -- an interest which we believe BATF is charged by statute with protecting. However an area traditionally recognized as

a single viticultural area may or may not coincide precisely with an area defined by purely viticultural characteristics. In fact the latter is often likely to be the case. Thus another conflict in the application of the BATF regulatory requirements to a specific set of historical and viticultural circumstances is likely to present itself.

The challenge which BATF faces in this viticultural area designation proceeding is to to identify an area:

- (1) distinguishable by geographic features;
- (2) possessing one or more viticulturally significant common characteristics;
- (3) which is currently and/or historically recognized as a viticultural area identified by the proposed name; and
- (4) the boundaries of which appear on a USGS map.

In responding to this challenge, balancing of competing considerations through the sound exercise of agency discretion will certainly be required.

It is the hope of the eastern valley growers of Napa Valley grapes to provide whatever assistance we can to the BATF. We hope to share with BATF the experience we have gained in attempting to balance the requirements of the BATF regulations in applying them to the historical Napa Valley grape growing region. We believe BATF can benefit from the knowledge we have gained and, indeed, that some of the ideas, which we have developed regarding the ways in which the competing BATF regulatory requirements may be balanced, will be of assistance.

To this end, specific evidence of the viticultural characteristics of the watershed area and the historical Napa Valley grape growing region has been offered. We have proposed a specific alternative to the watershed proposal; an alternative which we believe more nearly harmonizes the requirements of the BATF regulations. Historical evidence, supported by numerous exhibits, was presented at the hearing. This evidence supports a "Napa Valley" viticultural zone including the eastern valley grape-growing region. The inclusion of these eastern valleys in a "Napa Valley" viticultural area is appropriate since these valleys:

- (1) are viticulturally indistinguishable from areas included within the watershed proposal; and

- (2) have historically produced "Napa Valley" grapes.

In addition, several other considerations, which are important to the BATF's decision in this proceeding support inclusion of the eastern valleys of Napa County in any "Napa Valley" viticultural area.

First, Napa County may be a special case for the BATF. The "Napa Valley" appellation of origin is probably the single most well-recognized wine appellation in the United States. "Napa Valley" wines, like no other domestic wines, enjoy a national and international reputation. Napa County thus possesses a viticultural significance surpassing that of any other region. As a consequence, the significance of the BATF's decision is likely to be far greater than that of any other viticultural area designation.

Moreover, the long history of the use of the "Napa Valley" appellation of origin is likely to be the basis for potentially greater conflicts between the requirements of the BATF regulations. The need for flexibility in the informed exercise of agency discretion is greatest in such circumstances. Such flexibility may be justified, however, on the basis of the special circumstances presented in Napa County and need not be viewed as establishing a dangerous or undesirable precedent for areas which do not possess the unusual combination of viticultural and historical factors which have come to characterize the Napa Valley wine-producing and grape-growing region.

A second, and not unrelated, observation has to do with the name "Napa Valley" and its meaning. Before BATF can determine the area which the name identifies, BATF must decide in whose use of the term it is interested. The term "Napa Valley" may mean different things to different persons -- it may identify different areas.

The eastern valley growers of Napa County grapes believe that it is the common understanding of the ordinary consumer of "Napa Valley" wine which should be of interest to BATF. We do not believe that the BATF can properly discharge its responsibility to protect wine consumers by tailoring its viticultural area designations to the very limited, perhaps even eccentric, understanding of wine connoisseurs. Nor can the BATF discharge this responsibility by application of a rigid geological definition of the Napa Valley based upon concepts and standards foreign to the meaning of the term "Napa Valley" as it is understood by ordinary consumers of "Napa Valley" wine. The notion that

the "Napa Valley" viticultural area presents a special case is in large part a reflection of the fact the ordinary wine consumers have attached significance to this appellation. And when these consumers request "Napa Valley" wine, what do they believe they are getting? Wine produced from grapes grown in the traditional "Napa Valley" grape-growing region.

This argument is important for two very different reasons, both of which are directly related to BATF's consumer protection charter.

First, one can identify several potential viticultural areas within the Napa Valley proper. Designation of each would place differing emphasis upon different viticultural characteristics. However, each such limited viticultural area could lay equal claim to the name "Napa Valley." Designation of any one of these would violate the requirements of the BATF's regulations that the area designated by an appellation be the same area as is recognized by ordinary wine consumers as being represented by the name of the appellation. Satisfaction of this requirement is essential to preventing consumer confusion by substituting a new and narrower meaning for a well-known and widely used identifying name. We believe BATF must protect ordinary consumers of "Napa Valley" wine from both unwarranted expansion and unwarranted contraction of the area historically covered by a well-known appellation of origin. The ordinary wine consumer has come to rely upon the "Napa Valley" appellation as indicating a source of wines of consistently fine quality and characteristic flavor. The ordinary wine consumer probably knows little more than that "Napa Valley" identifies the area (of unspecified extent) from which "Napa Valley" wines have been produced. Thus, the significance of the "Napa Valley" appellation as currently and historically used is tautological -- it means whatever it means to ordinary wine consumers; and to ordinary wine consumers it means no more nor no less than that the wine was produced from grapes grown in the region from which "Napa Valley" wines have traditionally been produced. To change this meaning, without notice to the ordinary wine consumer of the change, would be inherently misleading and generate unwarranted consumer confusion.

Second, if the viticultural area designated by BATF as "Napa Valley" for appellation of origin purposes is significantly smaller than the area which has traditionally grown grapes for production of "Napa Valley" wines, there will be less "Napa Valley" wine available to meet the demand presently satisfied by wine produced from grapes grown in

the larger, historic producing area. This will result in an artificially induced supply/demand imbalance which will drive up the price of the smaller quantity of "Napa Valley" wine available to meet consumer demand. Consumers will pay more for no good reason.

Indeed, if David Pursglove is correct, consumers of "Napa Valley" wine could pay more for less, for lower quality wine. Writing in the April 1980 issue of "Washington Calendar" magazine, Mr. Pursglove acknowledges the theory that the smaller an appellation of origin the better the wine. He goes on, however, to reject this theory and advances a "counter theory" to which he personally subscribes, i.e., that "a broad appellation could mean a better wine because the winery can go wherever necessary to buy the best grapes with the special characteristics [the winery] desires for a given wine." We believe the BATF should not lose sight of this consideration in the face of possible efforts to narrowly restrict the limits of the "Napa Valley" viticultural area by wine connoisseurs, who purport to (but do not) represent the interests of ordinary wine consumers.

As the foregoing suggests, we believe a careful balancing of historical and viticultural factors will be required by BATF. We suggest that two somewhat different approaches may be utilized to reach the same result. In the first conceptual approach, one begins with an area possessing a set of common viticultural traits. Portions of this area are then eliminated if they do not meet the historical and/or current evidence test. Specifically, under this approach, viticulturally dissimilar areas, e.g., the hotter, steeper and drier regions of Napa County north and east of Putah Creek and Lake Berryessa, are eliminated. Other areas, including grape producing areas of adjacent counties, may also be eliminated on the basis of differences in soil types or other viticultural factors. Then, the historical evidence test is applied to further reduce the size of the viticultural area so as to conform to the multiple independent standards imposed by BATF. In this case the application of the historical evidence test would eliminate areas immediately outside Napa County which, while sharing one or more of the viticultural factors which characterize the historical grape growing region of Napa County, do not satisfy the historical and/or current evidence test.

Another conceptual approach will yield the same result. Under this approach, one begins with the present informal appellation area -- Napa County. Viticulturally dissimilar areas are then eliminated until a historically justified area possessing common viticulturally significant characteristics is found.

Of course, in each approach, some modification of the theoretical boundaries will be required in order to define these boundaries in terms of features found on a USGS map. And in this modification, BATF should consider elements of administrative feasibility. We believe, however, that whichever approach is followed, the result will be the same -- the "Napa Valley" viticultural area will include the eastern valleys of Napa County and follow borders generally similar to those we have proposed.

At this point it must be stressed that we are not proposing an unauthorized grandfathering of vineyards or areas based solely on historical sales. Grandfathering, as the term is properly used, would incorporate, within a viticultural area, noncontiguous grape-producing areas of dis-similar viticultural character solely because some grapes from this acreage had been used in blending "Napa Valley" wines. Our proposal does not involve grandfathering because we satisfy the requirement of sharing common viticultural traits with the remainder of the contiguous appellation area. Moreover, the historical evidence upon which we rely is not merely occasional sales of grapes which were used in blending a Napa Valley wine but which were not counted as satisfying the requirement that 75% of the wine be produced from grapes grown in the Napa region, i.e., Napa County. Rather, the historical evidence includes grape sales in which no differentiation was made between Napa River watershed grapes and eastern valley grapes for purposes of compliance with the requirements of the Napa Valley appellation. Indeed, in several cases specifically documented during the BATF hearing, 100% of the grapes of certain "Napa Valley" wines were grown in the eastern valleys of Napa County. For these reasons our proposal to continue the inclusion of the eastern valleys of Napa County in the "Napa Valley" viticultural area is not an effort to circumvent BATF's rule against grandfathering.

One final set of observations is in order as part of this overview presentation in response to suggestions that a "Napa Valley" appellation should apply to a valley. It has been suggested that a valley is synonymous with a watershed. In reality, however, the common understanding of the word "valley" does not equate a valley with a watershed. Many examples exist of "valleys," e.g., the Sacramento Valley, which are drained by more than one river. Indeed within Napa County, the Chiles Valley is drained partly by the Napa River watershed and partly through Lake Berryessa. Moreover, the watershed of any river system includes mountainous regions not usually considered part of the "valley." Thus, the Sacramento Valley is not normally thought of as

extending into Oregon, although the Sacramento River watershed does. The Mississippi River Valley is not usually thought to include half of the Appalachian mountains as well as most of the Rocky Mountains east of the Continental divide. Yosemite Valley is not normally thought to include the high-plateau mountainous watershed areas which feed the spectacular waterfalls that plunge into the valley.

An additional problem with the contention that a "Napa Valley" appellation should describe a watershed "valley" is that this theory places undue emphasis on textbook definitions. If one asserts that a "Napa Valley" appellation is inherently misleading unless it defines a "valley," the watershed proposal fails this test if the word "valley" is used in its normal sense. After all, when a visitor to the Napa Valley proper stands on the valley floor, the valley is defined by ridgelines to the east and west. But the ridgeline which the visitor sees to the east is not necessarily the ridgeline which defines the watershed of the Napa River. As often as not, the eastern ridgeline visible from the valley floor is not the boundary which defines the watershed.

Furthermore, the watershed of the Napa River includes all or part of several separate valleys. These valleys would not normally be considered integral to the Napa Valley, although for agricultural, and especially grape-growing purposes, the produce of these valleys would be considered produce of "Napa Valley". In this, these valleys share the same viticultural history as the eastern valleys of Napa County which, while not part of the watershed of the Napa River, have traditionally been treated as producing "Napa Valley" agricultural produce, especially grapes.

The point of the foregoing is that BATF should not be unduly concerned about the "valley" element of the "Napa Valley" appellation. Rather BATF should use the "Napa Valley" name in its traditional viticultural sense. We believe little good will be served by attempts to dissect this world-renowned appellation or by efforts to unduly emphasize geography textbook definitions which bear little relationship to the viticultural significance of the appellation as it is used by ordinary wine consumers.

II. Boundaries of the Napa Valley Historic Viticultural Area

The specific boundaries of the proposed historic viticultural area are shown on Map No. 1 and were discussed at the hearing by Rod Freebarin-Smith of San Francisco, California.

Commencing in the south at the intersect of the Napa County/Sonoma County boundary and the northern bank of Napa Slough, the western boundary follows Mayacamus Ridge from south to north along the Napa County/Sonoma County line to the Napa County/Lake County line. This western boundary represents a major geographic feature, the Mayacamus Mountain range, which distinguishes the proposed viticultural area from grape-growing regions immediately west of Napa County in Sonoma County. This boundary has both historical and viticultural significance.

The northern boundary then follows the Napa County/Lake County line westward to Putah Creek through a mountainous region which forms a cap to the Napa County grape-growing areas. Although this boundary is based upon the borders of political subdivisions, it should be noted that the proposed boundary appears on the USGS maps and is readily administered. Moreover, as the slope map indicates, a mountainous region, not suitable for grape growing, caps the grape-growing valleys of Napa County in the north. This mountainous region is different from the other mountain ranges within Napa County which are generally aligned in a series of parallel ridges running north/south. This area represents a merging of these ridges, including the Mayacamus ridge, to form a larger mass of mountains, higher than any others in the county. Indeed it is these very mountains which form the headwaters of the Napa River. The northern boundary of the proposed viticultural area runs through this mountainous region, generally delineating the geographic feature which characterizes the northern limits of the viticultural area. Because this feature is itself not precisely definable, use of a political border which reasonably approximates the geographic feature should be acceptable to BATF. Moreover, this northern boundary possesses both viticultural and historical significance.

The eastern boundary tracks the western bank of Putah Creek and Lake Berryessa, thus excluding the north-eastern corner of Napa County, an area not suitable for grape production. This portion of the eastern boundary follows geographic features appearing on USGS maps, i.e., Putah Creek and Lake Berryessa. These features distinguish the steeper mountainous areas of Napa County to the north and east of this line from the grape-producing regions of Napa County. The evidence of the viticulturally dissimilar characteristics of this excluded region, i.e., a combination of higher temperatures and lower rainfall, and the absence of current grape production in this area (Berryessa Valley now submerged beneath Lake Berryessa did once produce grapes for "Napa Valley" wines), indicate this boundary possesses both viticultural and historical significance.

The remainder of the eastern boundary is defined by the Napa County/Solano County line, along the ridge of the Vaca Mountains. This ridgeline is a distinctive geographic feature which demarks the coastal mountain valleys of Napa County from the viticulturally dissimilar central valley region. This ridgeline is the highest continuous ridgeline east of the Napa River. Indeed only an occasional mountain peak is higher between this ridgeline and the Napa River. The slope map clearly indicates the distinctive characteristic of this feature as defining the eastern reach of the grape growing region. This boundary possesses both viticultural and historical significance. This conclusion is supported by the fact that the areas to the east of this line are fundamentally different in climate (the central valley is widely recognized as climatologically different from the mountain valleys of Napa County) and have not produced grapes known as "Napa Valley" grapes.

The southern boundary of the proposed historical viticultural area is formed by the Napa County/Solano County line running westerly from the ridge of the Vaca Mountains to the ridge of the Napa River watershed where the Napa County/Solano County line turns south along the ridgeline. The proposed boundary follows the Napa County/Solano County line along this ridge south to Soscal Ridge. The proposed southern boundary follows Soscal Ridge west to the western bank of the Napa River, the western bank of the Napa River south to the northern bank of Napa Slough and the northern bank of Napa Slough to the point of intersection with the Napa County/Sonoma County line. This southern boundary follows the general southern limit of the mountainous region which characterizes the "Napa Valley" viticultural area. To the south of this boundary lies flatter terrain much of which is marsh and salt flats not suitable for grape production. The southern border thus delineates a series of geographic features which characterize the southern limit of the viticultural area. Because grapes have not historically been produced in this area and sold as "Napa Valley" grapes, this boundary possesses both viticultural and historical significance.

This proposed boundary meets all of the criteria established by BATF. It excludes parts of Napa County which are not suitable for grape-growing purposes; it includes viticulturally similar areas which have traditionally produced high-quality grapes and continue to do so. Finally, all of the proposed boundaries are features which appear on a USGS map of the largest applicable scale.

III. Viticultural Characteristics

Two expert witnesses appeared on behalf of the eastern valley growers and presented their views on the viticultural characteristics of the proposed area: James Hanson, a civil engineer from Sacramento, California; and James Lider, from St. Helena, California, a viticultural consultant and former Napa County Agricultural Advisor for the University of California Co-operative Extension.

Mr. Hanson's testimony established that a variety of viticultural characteristics distinguish the historical grape-growing regions within Napa County (all of which have to date been authorized to use the "Napa Valley" appellation) from the nearby grape-growing regions of Sonoma, Lake, Yolo, and Solano Counties. This conclusion is illustrated on Map Nos. 2, 3, and 4. On Map Nos. 2 and 3, it can be seen that the predominant soil associations of Napa County are:

1. Bale-Colo-Yolo;
2. Tehama;
3. Bressa-Dibble-Sobrante; and
4. Haire-Coombs.

In contrast, the general soil associations found in neighboring Sonoma County are:

1. Huichica-Wright-Zamora; and
2. Yolo-Cortina-Pleasanton.

While a specific soil series, such as Yolo, may be found in both regions, such soils, found in combination with other soil types, form associations which are distinctly unique to each region. Thus, for example, while Sonoma and Napa Counties share a similar climate, the variation in soil type associations distinguish the grape-producing area of Napa from those of Sonoma.

On Map No. 2, data is presented contrasting temperature ranges in Napa County to those of the surrounding areas. Using Rutherford as a base, it can be seen that Sonoma's vineyard regions are 10-20% cooler than Napa's while Solano's, east of the Vaca Mountains, are 20-30% warmer. This demonstrates that a clear difference exists between the climate in Napa's grape-producing areas and that of the surrounding areas.

In addition to evidence distinguishing the historic grape growing areas of Napa County from surrounding regions, Messrs. Hanson and Lider also addressed the viticultural similarities which exist between the Napa River watershed and the eastern Napa County grape-producing valleys. Of the five basic soil associations found within Napa Valley proper and considered suitable for grape production, four also are found within the eastern valleys. This strong similarity of soil types leads to the conclusion that, insofar as soil type is considered a viticultural trait, there is no viticultural significance to this soil type variation. Indeed, this same conclusion was drawn by Mr. Bates, an expert witness appearing on behalf of the watershed proposal, who stated that there is "no distinctive difference in soils for purposes of growing grapes" between the watershed area and the eastern valleys.

Map No. 4 illustrates the variations in temperature and rainfall existing within Napa County. Generally, temperatures are cooler in the southern part of the country and warmer in the north. Within the watershed area, temperatures (expressed in terms of total degree days over 50° between April and October) vary by 16% from north to south. Similarly, average annual rainfall varies from 50" in the north to 20" in the south, with most of the Napa Valley proper, as well as Pope Valley in the east, receiving 30"-40" average per year.

The same temperature and rainfall variations which appear in the valley proper extend also to the eastern valleys included in our proposal. Any comparison based upon averages for the entire eastern part of the county will yield misleading results. The northeastern corner of the county (north and east of Lake Berryessa) is both drier and warmer than the grape growing areas of the eastern valleys proposed to be included in the "Napa Valley" viticultural area. Neither the climate nor the steep, rugged terrain of the far northeastern corner of Napa County is conducive to the production of grapes, and for these reasons this area is not included in the proposed historic viticultural area. Consequently, it does not appear appropriate for BATF to consider evidence based on average rainfall and temperature readings which are not representative by reason of including data applicable to this region.

In sum, the evidence establishes that a range of viticultural features exists within the Napa River watershed itself. This variety of soil types, rainfall, and temperatures makes it unrealistic to use any one of these traits as a determining factor in defining the viticultural area, particularly in view of the fact that high-quality grapes have been produced in both the northern and southern parts of the valley. This range of viticultural

characteristics does not preclude designation of an area characterized by these features as a viticultural area. Rather, the range of these characteristics is sufficiently narrow so as to permit the BATF to utilize the totality of these viticultural traits, rather than any single one, to describe a viticultural area. More importantly, however, the significant viticultural characteristics of the eastern valleys of Napa County fall squarely within the ranges of the various viticultural traits found within the Napa River watershed. Thus, no viticulturally valid basis exists for excluding these eastern valleys from a viticultural area based upon the Napa River watershed.

IV. Historic Evidence

Based upon winery records, newspaper and trade journal articles, and the recollections of numerous Napa County residents, as documented by William Heintz, a wine historian from Glen Ellen, California, grapes from over one dozen valleys in Napa County have been used in the production of "Napa Valley" wines. A copy of Mr. Heintz's study, "A Review of the Historical Uses of the Terms Napa Valley and Napa County," is included with these comments in order to be made a part of the official record. In addition, Map No. 5 details the historic development of Napa County vineyards. It should be noted that not only Napa Valley proper vineyards but also Pope Valley and Chiles Valley vineyards were supplying grapes to Napa Valley wineries well before 1900.

The evidence shows that historically any grapes grown in Napa County have been entitled to use the term "Napa Valley" as an appellation of origin. With BATF approval, this labeling practice continues today. As an example, we have included a series of typical labels appearing on wine bottled by the Pope Valley Winery and approved by BATF in 1979. Individual growers and vintners also testified to this practice and to the high quality of eastern valley grapes. Thus, both historically and currently, the appellation "Napa Valley" has included wine made from grapes grown in the eastern valleys.

The historical development of the term "Napa Valley" has been unique. Probably due to its commercial and geographical dominance of the entire county, the term "Napa Valley" has become synonymous with "Napa County" and the two are used inter-changeably. Consequently, any departure by BATF from the commonly held understanding of ordinary wine consumers assumes a great likelihood of misleading those

both the viticultural and historical requirements of the BATF's regulations;

- Areas excluded from the historic viticultral zone are excluded because they fail to satisfy one or the other of these requirements;
- Viticulturally significant characteristics, e.g., soil types, temperature and rainfall, of Sonoma, Lake, Yolo, and Solano Counties differentiate these areas from the grape-growing regions of Napa County;
- The area within the watershed proposal possesses a range of viticultural traits sufficiently similar to provide a basis for establishing a viticultural area;
- The eastern valleys of Napa County share these same traits to the extent that no viticulturally valid basis exists for excluding these valleys from a viticultural area based upon the Napa River watershed;
- Historically any grapes grown in Napa County have been entitled to use the "Napa Valley" appellation;
- The historical development of the name "Napa Valley" has been unique, with the name of the largest valley in the county (and the largest geographical feature as well) becoming a substitute for the name Napa County for most purposes, especially for viticultural purposes;
- The eastern valleys of Napa County have historically produced grapes equal to or better than those grown in the Napa Valley proper -- a fact to which individual eastern valley growers attested and which major vintners confirmed in testimony before the BATF panel;
- The watershed proposal is deficient for failing to include the eastern valleys which can lay equal claim to the use of the "Napa Valley" appellation on historical grounds and viticultural grounds.

In addition, the proposed watershed boundaries present vexing problems of administrability. The ridgeline used for portions of the boundary is at times difficult to locate on a USGS map. It also is strangely arbitrary, where, for example, it cuts directly through an existing vineyard in the low slope area which separates the Pope Valley from Chiles Valley. There is no viticultural reason why grapes grown in that part of the vineyard which drains into Lake Berryessa are inherently superior to those grown on the other side of this imaginary line where the vineyard land drains into the Napa River. The eastern boundary we have proposed is more readily identifiable than the eastern boundary of the watershed proposal.

Along with expert testimony on geographical, viticultural, and historical traits of the Napa Valley area, we call BATF's attention to the testimony of fourteen other interested parties -- eastern valley growers, vintners, wine wholesalers, and others who advocated inclusion of the eastern valleys:

1. Andy Cangemi, Ranch Manager, Pope Valley Vineyards, Pope Valley, Napa County, CA:

Presentation of precise climatological data from Pope Valley in response to remarks made during watershed testimony.

2. Carl Rose, Priest Ranch, Soda Valley, Napa County, CA:

Remarks concerning the historical application of the term "Napa Valley" to include Soda Valley.

3. Burton Blackwell, Priest Ranch, Soda Valley, Napa County, CA:

Comments on the economic importance of the "Napa Valley" appellation to eastern valley grape growers and the traditional understanding that all of Napa County produces "Napa Valley" wine.

4. Jack Welsch, Fromm and Sichel, San Francisco, and St. Regis Napa Vineyards, Napa CA:

Speaking as a Napa Valley grape grower as well as a distributor of wines and an expert on European appellations, stated that grapes grown in the eastern valleys of Napa County, deserve continued inclusion in the "Napa Valley" appellation on grounds of their high quality and their "Napa Valley" character.

5. Robert Mondavi, Robert Mondavi Winery, Oakville CA:

Many locations within Napa County produce grapes with specific characteristics, but there is an overriding "Napa Valley" style which is discernable in grapes from all the valleys of Napa County. High quality grapes from eastern valleys have traditionally been used by the Robert Mondavi Winery to produce some of its best "Napa Valley" wines.

6. Brother Timothy, Cellar Master, Christian Brothers Winery, Napa, CA:

Grapes from eastern valleys of Napa County have always been considered to be of "Napa Valley" quality and character. Eastern valley grapes are used in Christian Brothers "Napa Valley" wines.

7. John Brock, St. Regis Napa Vineyards, Napa, CA:

Comparison of soil types in Napa Valley proper and in the eastern valleys by an owner of land in both Napa Valley proper and in Capell Valley with identical soils.

8. Michael Walsh, Calplans Corporation, Oakland, CA:

Comparison of the strong similarities of climate and soil in Wooden and Capell Valleys with sections of Napa Valley proper. Refutation of climatological characterization of Wooden Valley made during watershed testimony. Evidence documents the exceptionally high quality of grapes grown in in Wooden Valley and sold to Robert Modavi Winery.

9. Robert DeVitt, Pope Valley Winery, Pope Valley, CA:

Remarks concerning the past and current usage of the "Napa Valley" appellation for wines produced from grapes grown exclusively in the Pope Valley. Remarks on the high quality of grapes grown in Pope Valley.

10. Lilburn Clark, Wooden Valley, Napa County, CA:

Testimony of quality grape production in the eastern valleys of Napa County before Prohibition.
11. Kenneth Clark, Wooden Valley, Napa County, CA:

Testimony of quality grape production in the eastern valleys of Napa County before Prohibition.
12. Howard Thompson, Gordon Valley, Napa County, CA:

Comments on the shared ownership of the "Napa Valley" appellation among all the valleys that have contributed to its reputation. Assertion (to an approving round of applause) that to approve the watershed proposal would be tantamount to a taking of a valuable property right without compensation and due process of law in violation of the Constitutional rights of the eastern valley growers.
13. Donald Gordon, Gordon Valley, Napa County, CA:

Comments on the similarities of growing conditions in eastern valleys of Napa County and in sections of Napa Valley proper.
14. Tim Mondavi, Robert Mondavi Winery, Oakville, CA:

Remarks concerning the high quality of grapes from the eastern valleys of Napa County used in Robert Mondavi "Napa Valley" wines. Remarks on the importance to winemakers of blending wine made of grapes from different parts of Napa County to achieve specific characteristics.

In conclusion, we urge BATF not to lose sight of two important considerations implicated in this designation procedure. First, it is undisputed that vineyards in the eastern valleys traditionally have produced high quality grapes. Vintners have been willing to pay a premium price to obtain these grapes and use them in meeting the current appellation of origin requirements of the BATF. In 1983, the minimum content requirements for viticultural area based appellation of origin purposes will rise to 85%. The demand

for "Napa Valley" grapes may rise accordingly. Surely, considerations of fairness require that the boundaries of the Napa Valley Viticultural Area not be drawn so narrowly as to benefit some and penalize other vineyard owners who have worked to produce grapes of similarly superior quality. Second, only a reasonably large viticultural area can protect the interests of the American wine-consuming public. An unduly narrow viticultural area for the "Napa Valley" appellation would serve only to confuse the ordinary wine consumer by ascribing a new meaning to the "Napa Valley" appellation different from that upon which he or she has come to rely. Moreover, any significant reduction in the "Napa Valley" appellation would produce an unwarranted increase in the wholesale and retail prices of "Napa Valley" wine -- a consequence which we believe BATF should avoid. If it is deemed desirable to provide more specific information respecting grape origin to satisfy the desires of wine connoisseurs, this can be achieved by designation of more limited viticultural sub-areas within the "Napa Valley" viticultural zone.

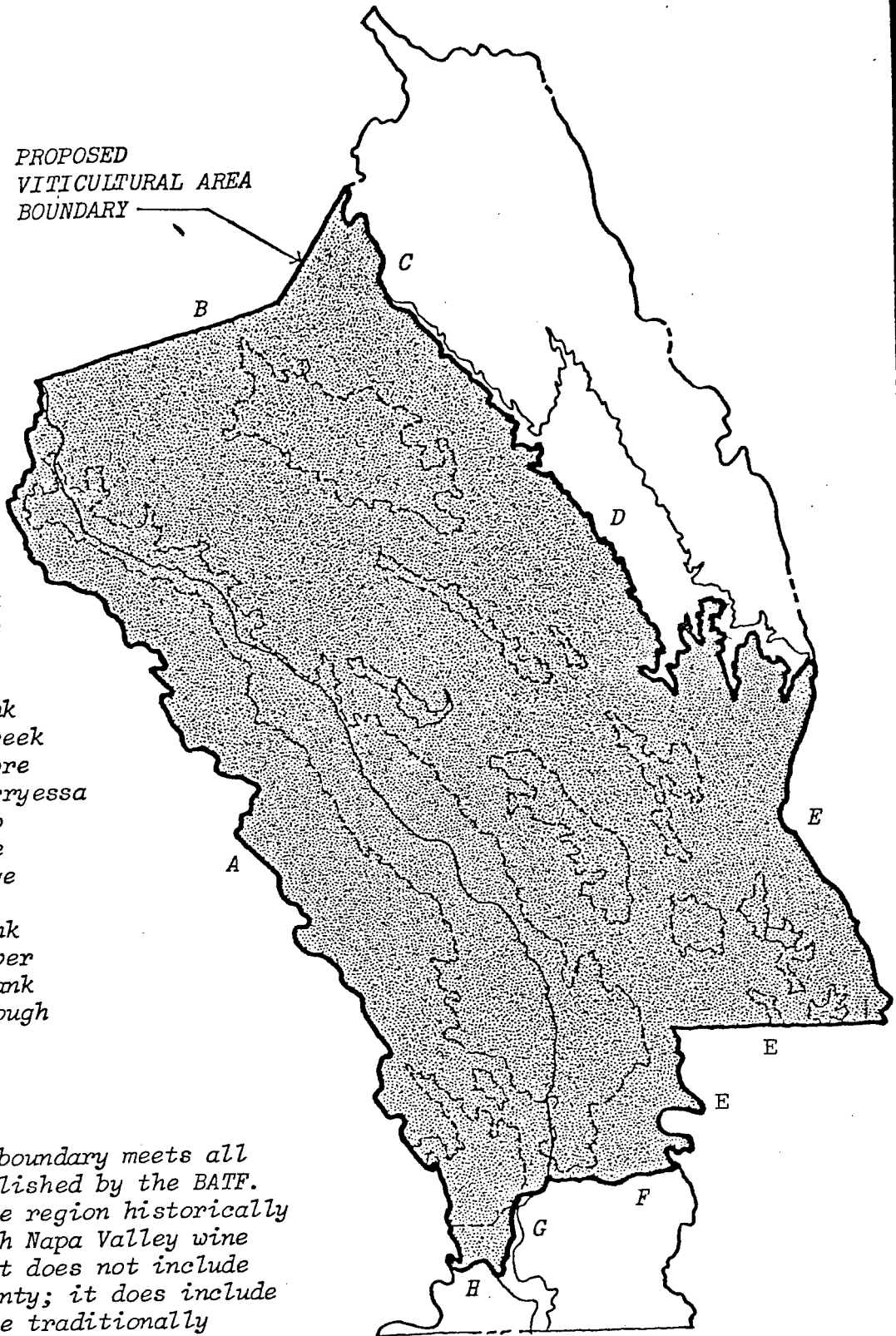
Respectfully submitted,



William F. Demarest, Jr.
Karen K. Treadway

Foreman, Dyess, Prewett,
Rosenberg & Henderson
Suite 350
1300 19th Street, N.W.
Washington, D.C. 20036

PROPOSED
VITICULTURAL AREA
BOUNDARY



LEGEND

- A. Napa/Sonoma County line
- B. Napa/Lake County line
- C. Western bank of Putah Creek
- D. Western shore of Lake Berryessa
- E. Napa/Solano County line
- F. Soscol Ridge line
- G. Western bank of Napa River
- H. Northern bank of Napa Slough

SUMMARY

This proposed boundary meets all criteria established by the BATF. It encloses the region historically associated with Napa Valley wine production. It does not include the entire County; it does include areas that have traditionally produced Napa Valley's wine. And finally, all of the proposed boundaries are features which appear on a U.S.G.S. map of the largest applicable scale.

NAPA VALLEY APPELLATION: HISTORIC VITICULTURAL AREA

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JAMES BARSEN, Civil Engineer Sacramento

JAMES LIDER, Viticultural Consultant St. Helena

WILLIAM DEMAREST, Attorney Washington D.C.







GREGORY RODENO, Attorney Napa

WILLIAM STEVENS, Wine Historian Glen Ellen

Map No. 1

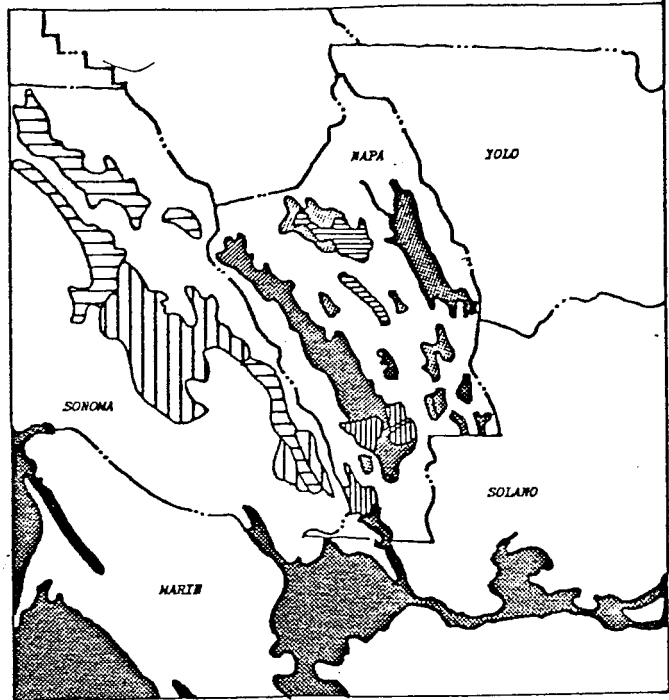
120
PROPOSED VITICULTURAL AREA BOUNDARY

Legend

-  Huichica-Wright-Zamora
-  Yolo-Cortina-Pleasanton
-  Bale-Cole-Yolo
-  Tehama
-  Bressa-Dibble-Sobrante
-  Haire-Coombs

This map demonstrates that the predominant soil types of Napa's vineyard regions are the Bale-Cole-Yolo, Tehama, Bressa-Dibble-Sobrante and Haire-Coombs series. Sonoma's are the Huichica-Wright-Zamora and Yolo-Cortina-Pleasanton series. There is, therefore, a clear difference between the grape-producing soils of the two counties.

REGIONAL SOIL TYPES



Source

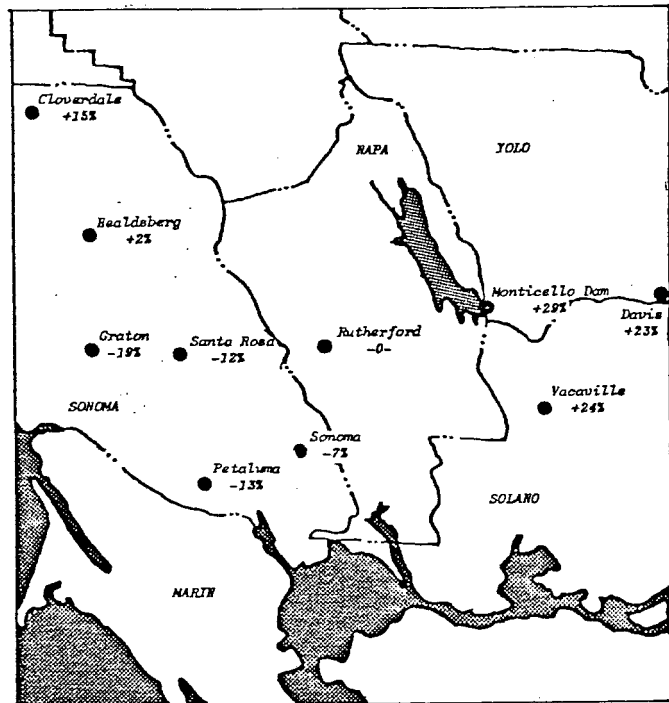
U.S.D.A. Soil Conservation Service in cooperation with the University of California Experimental Station

Legend

- Vacaville — Recording Station
- +24% — Temperature (in degree days over 50° F, April - October) relative to Rutherford, centrally located in the Napa Valley

Comparing the average temperatures of these 3 counties, Sonoma's vineyard regions are 11% cooler than Napa's, and Solano's, east of the Vaca Mountains, 25% warmer. This demonstrates that Napa's climate is distinctly different from adjacent areas.

REGIONAL TEMPERATURE



Source

Cooperative Extension, University of California, Napa Valley; U.S. Dept. of Commerce/Environmental Data Service

NAPA VALLEY APPELLATION: HISTORIC VITICULTURAL AREA

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

GREGORY RODERO, Attorney Napa

WILLIAM REJWITZ, Wine Historian Glen Ellen

Map No. 2

REGIONAL SOIL TYPES & TEMPERATURE

SOILS SERIES LEGEND

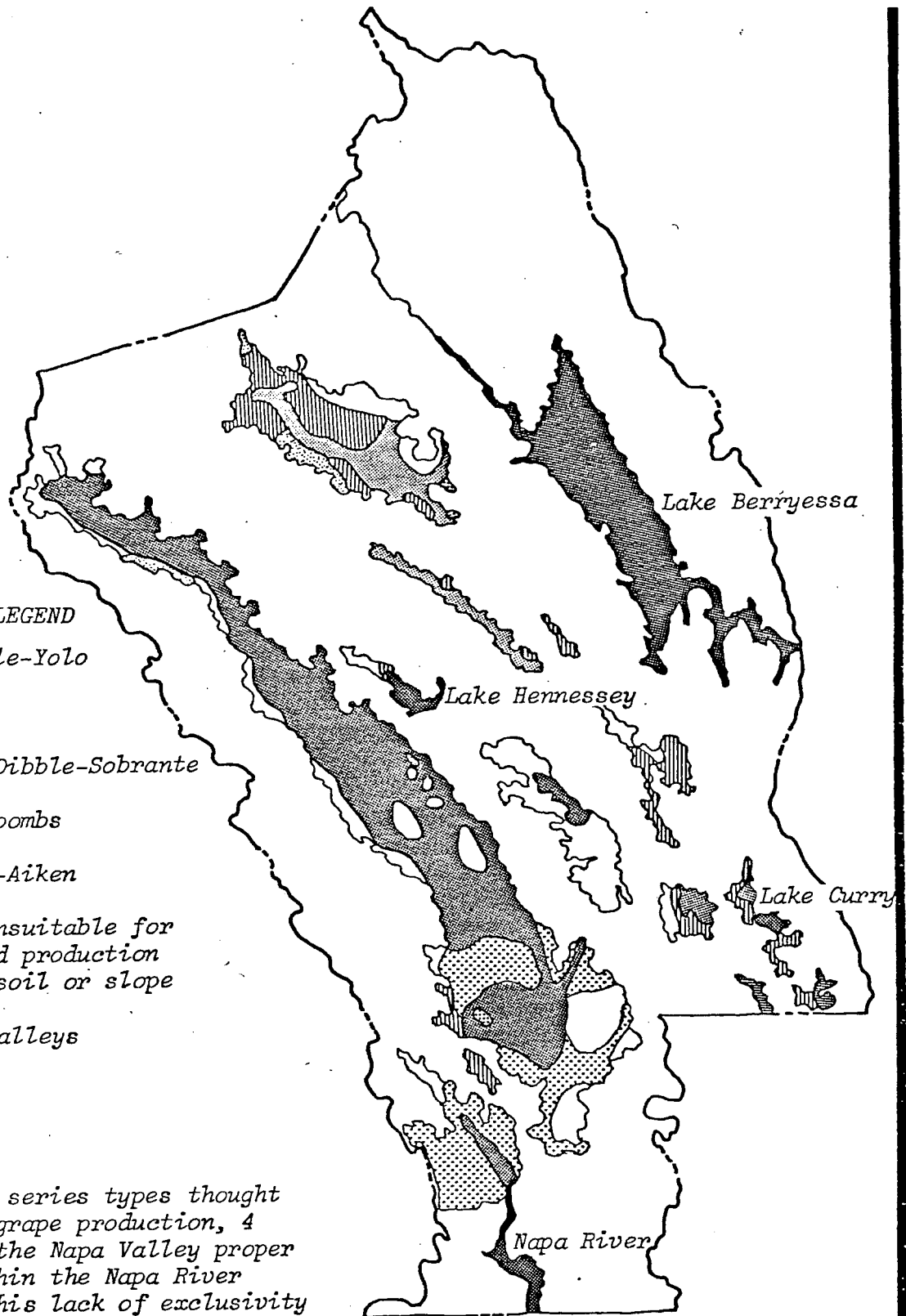
-  Bale-Cole-Yolo
-  Tehama
-  Bressa-Dibble-Sobrante
-  Haire-Coombs
-  Forward-Aiken
-  Areas unsuitable for vineyard production due to soil or slope
-  Major Valleys

CONCLUSIONS

Of the 5 soil series types thought suitable for grape production, 4 are found in the Napa Valley proper and all 5 within the Napa River Watershed. This lack of exclusivity makes it difficult to use soil type as a determinant in setting the viticultural area boundary (unless a zone smaller than the Napa Valley floor is to be advocated).

SOURCE

U.S.D.A. Soil Conservation Service in cooperation with the University of California Experimental Station



NAPA VALLEY APPELLATION: HISTORIC VITICULTURAL AREA

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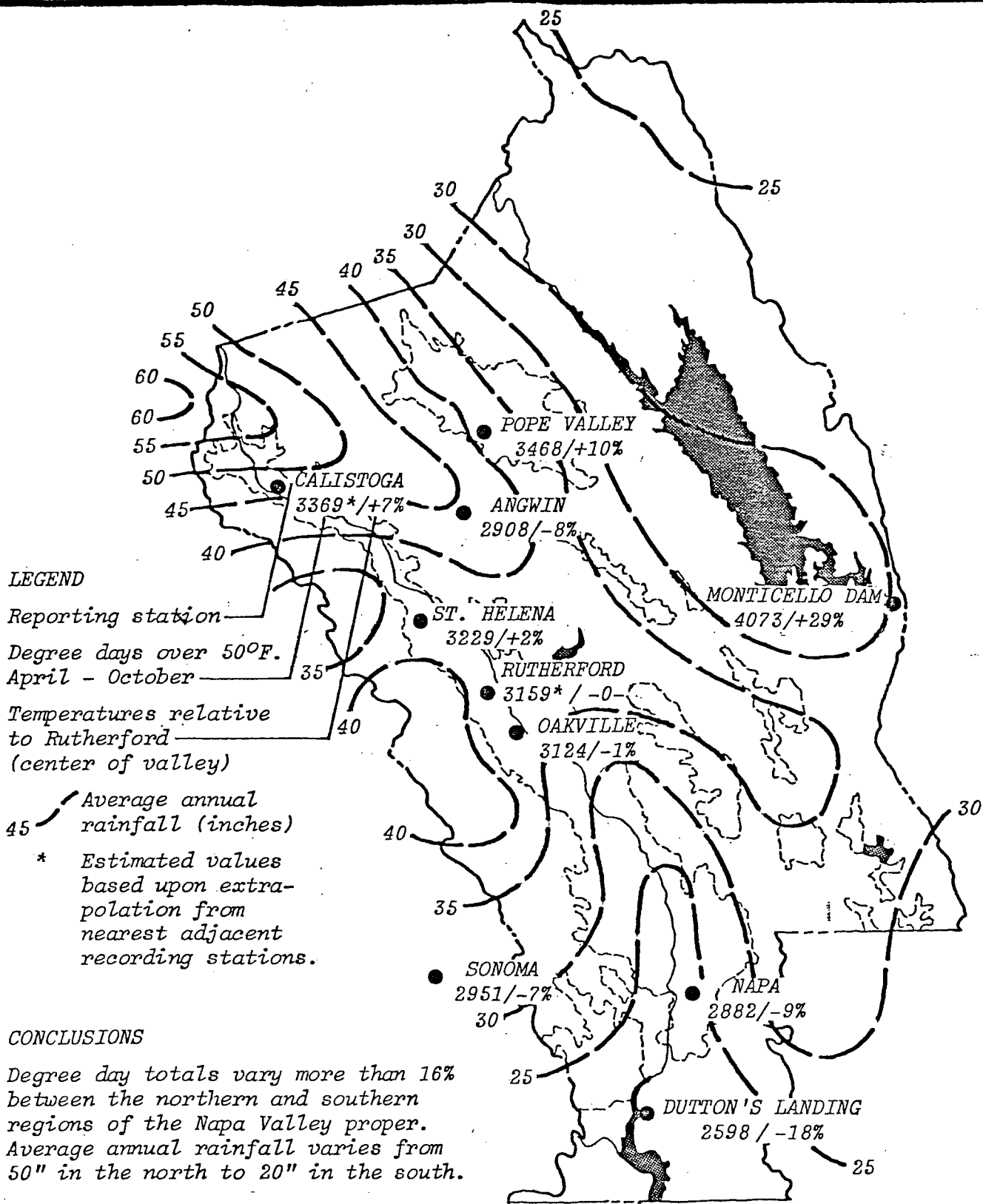
JAMES LYDER, Viticultural Consultant St. Helena

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GREGORY RODERO, Attorney Napa

WILLIAM REITZL, Wine Historian Glen Ellen

MAP NO. 3



LEGEND

- Reporting station
- Degree days over 50°F. April - October
- Temperatures relative to Rutherford (center of valley)
- Average annual rainfall (inches)
- * Estimated values based upon extrapolation from nearest adjacent recording stations.

CONCLUSIONS

Degree day totals vary more than 16% between the northern and southern regions of the Napa Valley proper. Average annual rainfall varies from 50" in the north to 20" in the south.

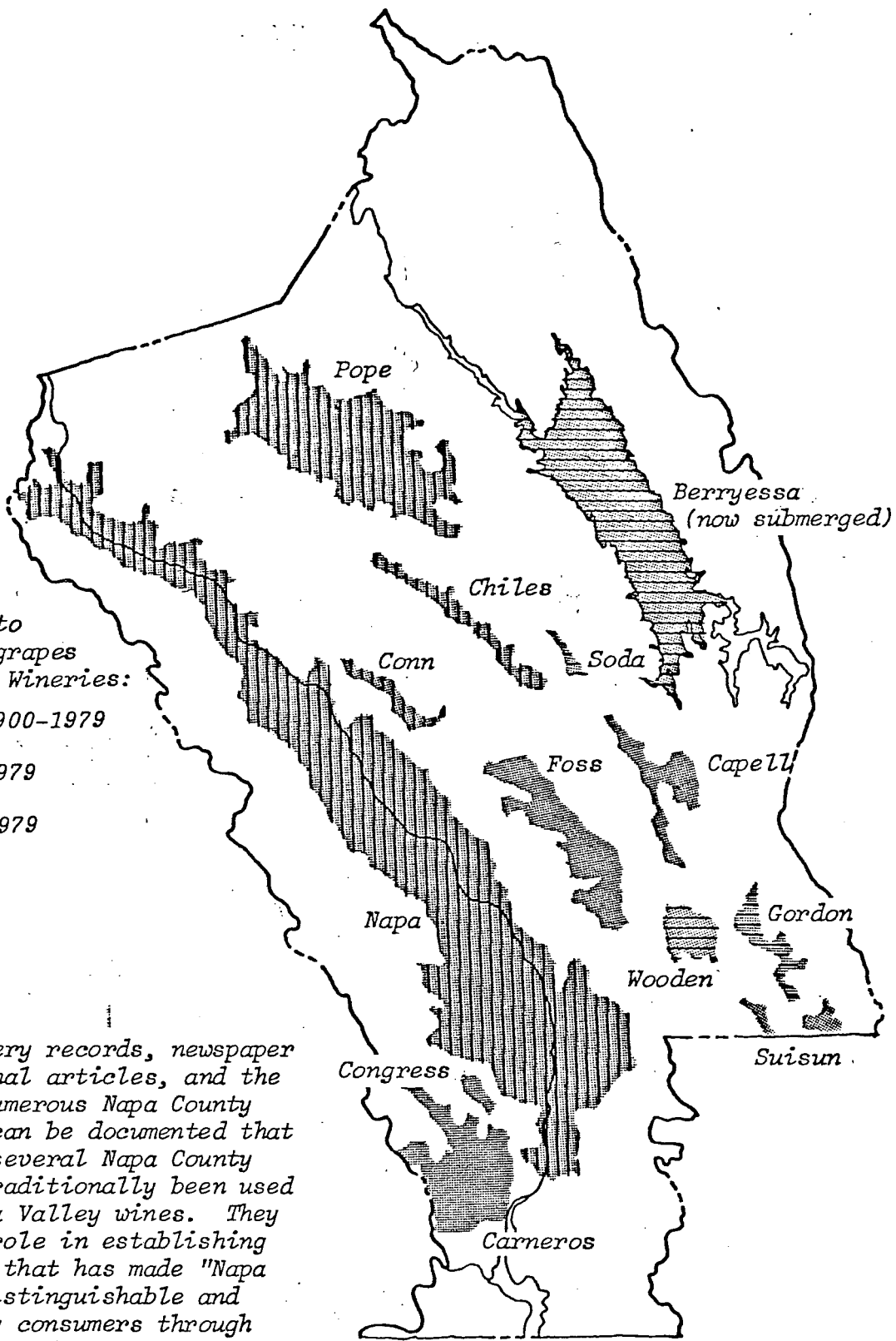
SOURCE

Cooperative Extension, University of California, Napa Valley

NAPA VALLEY APPELLATION: HISTORIC VITICULTURAL AREA




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 WILLIAM HEINTZ, Wine Historian Glen Ellen

Map No. 4



LEGEND

Valleys known to have supplied grapes to Napa Valley Wineries:

-  Before 1900-1979
-  1900 - 1979
-  1930 - 1979

CONCLUSIONS

Based upon winery records, newspaper and trade journal articles, and the testimony of numerous Napa County residents, it can be documented that the grapes of several Napa County valleys have traditionally been used to produce Napa Valley wines. They have played a role in establishing the reputation that has made "Napa Valley" wine distinguishable and sought after by consumers through the U.S. and abroad. In the absence of persuasive soil or climatic determinants, all of these valleys should be included within the Napa Valley viticultural area.

SOURCE

William F. Heintz, *A Review of the Historical Uses of the Terms Napa Valley and Napa County*, 1979.

NAPA VALLEY APPELLATION: HISTORIC VITICULTURAL AREA

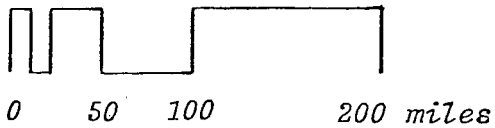
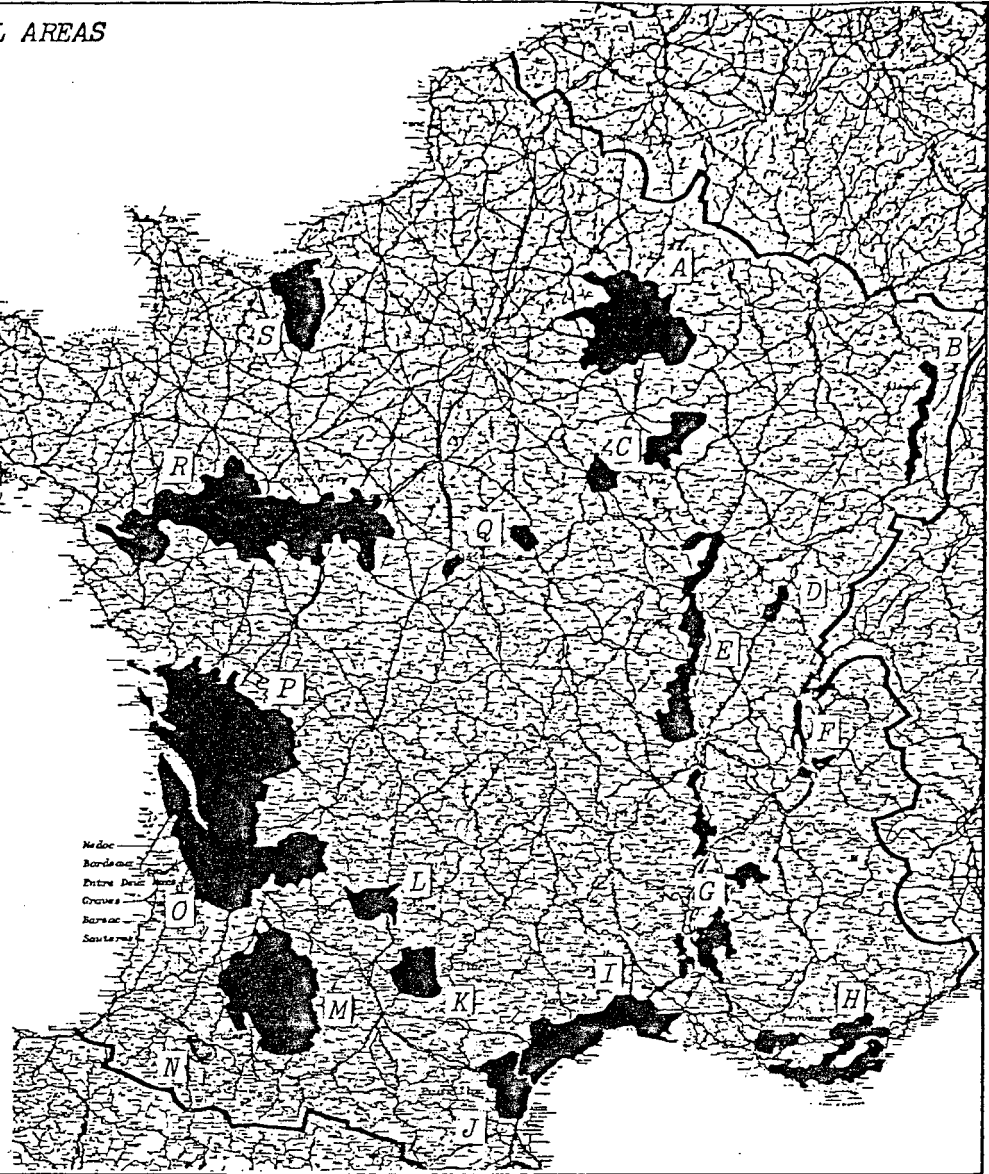
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 JAMES BARKER, Civil Engineer Sacramento
 JAMES LIDER, Viticultural Consultant St. Helena
 WILLIAM DEMAREST, Attorney Washington D.C.
 GREGORI RODENO, Attorney Napa
 WILLIAM HEINTZ, Wine Historian Glen Ellen

Map No. 5

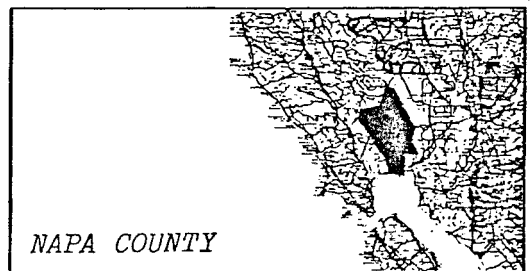
FRENCH VITICULTURAL AREAS

LEGEND

- A. Champagne
- B. Alsace
- C. Chablis
- D. Jura
- E. Burgundy
- F. Savoy
- G. Cotes du Rhone
- H. Provence
- I. Languedoc
- J. Roussillon
- K. Gaillac
- L. Cahors
- M. Armagnac
- N. Landes
- O. Bordeaux
- P. Cognac
- Q. Nivernais
- R. Loire Valley
- S. Calvados



Both maps drawn at same scale



CONCLUSION

Many French wine districts are at least as large as Napa County. Any general viticultural area designated within the boundaries of Napa County would therefore not be unusually large relative to the established viticultural areas of France.

SOURCE

Review Vinicole Internationale, North American Edition, 1979

NAPA VALLEY APPELLATION: HISTORIC VITICULTURAL AREA

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GREGORY RODRIGUEZ, Attorney Napa

Map No. 6

The grapes for this wine came from the Offner Vineyards, on the eastern slope of Howell Mountain in Pope Valley.

They were harvested in the first week of October 1978, with a sugar content of 23° Brix and .8gm per 100ml of total acid. The wine was fermented in small 60 gallon French Oak casks until dry. The new wine was racked off its lees, then returned for settling and clarification. The wine was bottled in March 1979 with a total of 390 cases for this vintage.

The Pope Valley Winery is located 11 miles North/East of St. Helena, in Napa County. We are one of the smaller wineries in California and have a limited production of about 10,000 cases per vintage.

From selecting the finest grapes for crushing through the process of ageing in small oak cooperage, we are able to devote the individual care distinctive in each wine we make.

We invite you to visit the winery and enjoy the picturesque setting while sampling our wines in a quiet atmosphere, reminiscent of Early California.

*The James Devitt Family
Pope Valley Road
Napa County, California*



POPE VALLEY
1978 NAPA VALLEY
DRY CHENIN
BLANC
OFFNER VINEYARDS

Produced & bottled by Pope Valley Winery
Pope Valley, Napa County, CA. 94567
ALCOHOL 12% BY VOLUME

CALIFORNIA WINELETTER
The Independent Wine Industry News Service—Since 1948
Phyllis van Kriedt, Editor and Publisher

P.O. Box 70
Mill Valley, CA 94941

San Francisco: Phone (415) 781-1132
Mill Valley: Phone (415) 388-2578

May 26, 1980

Dr. Edward J. Wawzkiewicz
Dept. of Microbiology and Immunology
University of Illinois
835 South Wolcott Ave.
P. O. Box 6998
Chicago, IL 60680

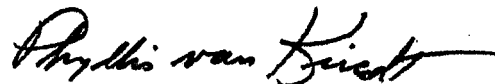
Dear Dr. Ed;

Thank you for the copy of your letter to Mr. Dickerson regarding your proposal for dividing the Napa River watershed into "Mountain" and "Valley" appellations (and also for all the other material which you have so kindly sent on to me this spring).

I think you have an excellent point regarding the appellation, and your written testimony is very well stated. I hope the Bureau listens. In my opinion the BATF people at these last hearings seemed considerably more open-minded than the bunch who conducted the public hearings on the labeling regulations.

If they don't start moving a little faster, we won't have any regulations set up by 1980!

Sincerely,



Phyllis van Kriedt
CALIFORNIA WINELETTER

"DR. ED"
 PROPOSES A
 SPLIT OF
 THE NAPA
 WATERSHED

In our last issue we noted that at the public hearings for the "Napa Valley" appellation "no testimony for an area smaller than the watershed was presented." Now we have received a copy of written testimony sent to the Bureau on May 15 by Dr. Edward Wawszkiewicz, associate professor of microbiology at the University of Illinois. "Dr. Ed" proposes that the watershed be broken into two appellations -- "Napa Valley" and "Napa Mountain." He quotes a number of dictionaries to point out that "mountains and valleys are mutually exclusive...A wine grown in a vineyard in the Napa River watershed on a mountain, say 2000 feet high" and labeled as "Napa Valley" wine would surely confuse consumers. "...If 'Napa Mountain' wines are forced to go to market as 'Napa Valley' wines, at the minimum an explanation to the effect that as far as the Bureau is concerned the word 'valley' is equivalent to the word 'mountain' and as such has no meaning, would have to be given somewhere on the label."

MOUNTAIN
 WINES AND
 VALLEY
 WINES ARE
 DIFFERENT

"Dr. Ed" notes that "elevation of a land mass brings, at various heights, characteristic and important changes in microclimate...These changes...can exert profound effects on the growth and ripening of grapes and, consequently, on the character of the wines produced therefrom...The Bureau will be making a great mistake if it does not recognize these facts of geology and biology." "Dr. Ed"'s U.S.G.S. map of the area shows a demarcation line at the 400-foot elevation --his proposal for the area to be included as the "Napa Valley" appellation, with the rest of the watershed to be "Napa Mountain." He concludes, "Under no circumstances should wine originating from grapes grown outside the watershed area (e.g., east of it) be permitted to be labeled by either appellation."

REMARKABLE
 VALUES IN
 FRENCH
 WHITE WINES

Says Peter A. Sichel in his assessment of the 1979 French vintage, "...the quality available from the Mediterranean areas of France, whether in the form of lesser known A.O.C., V.D.S.Q., Vin du Pays or well selected Vins de Table, is remarkable and in value for money terms can stand up to competition from Italy, California, or anywhere else." Be that as it may, we in the Bay Area are getting a good chance to try moderately priced wines from a good many areas of France during the coming weeks as the White Wines of France promotion -- a follow-up of last fall's big push for inexpensive French wines, both red and white -- swings into full gear. Some 98 selected appellation d'origine white wines from Bordeaux, Alsace, the Loire Valley and Burgundy are being featured by over a hundred retail outlets and restaurants. Most retail in the \$5 to \$7 range, but at a press tasting held in San Francisco May 19 we sampled a number of excellent wines in the \$3 to \$4 range -- Pierre Casteja's '78 Chevalier de Védrières (\$3.95), a Sauvignon Blanc imported by Mosswood; a NV Ropiteau Blanc de Blancs (\$2.95, Browne Vintners), and a '78 Domaine des Girardières Vouvray (\$4, Almadén Import Co.) -- come to mind...Food and Wines From France, New York-based agency of the French government, and their PR representative, Bell and Stanton, are doing the same smooth job with the spring promotion that was so evident last fall. Television spots, tastings, carefully orchestrated display materials, are all telling the Bay Area consumer that fine French wines are available at modest prices.

ITALIAN
 DETERMINISM

The French share of the import market nationwide, though, is small compared to what the Italians are sending us. Import statistics for the first quarter of 1980 show table wines up 5% overall, but only because Italian imports are up a whopping 26%! The Italians have a whopping wine promotion budget, too -- over \$2 million will be spent before the end of the year. Then there are the individual efforts -- Villa Banfi, for example, has earmarked some \$15 million for advertising its line of wines and liqueurs this year in the U.S. and has announced a goal of sales of 9 million cases in 1980 for its lead product, Riumite,

Moody's Wine Review

Denman Moody, Jr., Editor and Publisher • ~~4307 Post Oak Park Drive~~ • Houston, Texas ~~77027~~

6134 Inwood

77057

Dear Sirs,

I support the joint appellation petition of the Napa Valley Grape Growers and Napa Valley Vintners and

I believe that the Napa Valley is recognized by consumers (even in Australia - I was there in March) as one of the most distinctive wine producing regions in the world, and, in my opinion, the proposal of the above organization's fairly describes and defines the area which produces wines known as "Napa Valley".

Primary Marketing Agent:

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Turgeon & Lohr Winery*

Distributor:

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Primary Marketing Agent:

*Champagne Louis Roederer
Coron Père et Fils Burgundies
Jaboulet-Vercherre Burgundies
Hans Kendermann
ALRCO Bordeaux Selections
ALRCO Italian Selections*

May 20, 1980

Mr. G. R. Dickerson, Director
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 385
Washington, D.C. 20044

Attn: Chief, Regulations and Procedures Division

Dear Sir:

My name is Steve Situm. I am a sales supervisor for the A.L. Romano Wine Company of San Francisco, and have worked for the company for 8 years. I have been connected with wines for over 17 years, on both the retail and wholesale levels.

My responsibilities for the A.L. Romano Wine Company include marketing responsibility through brand management, supervisor of 6 salespeople in San Francisco, and account executive responsibilities, which by definition means 'calling on, and developing added sales through marketing concepts'. This responsibility includes 5 separate wholesalers not located in our immediate sales area.

I have extensive knowledge of European and Domestic wines, and have been involved as part of management for my company in selecting, through blind tasting, most of the brands that we now carry in our house.

I should like to add here that I do not grow any grapes, or own any vineyards, or have any interest in any winery in California. My only interest here is that of furthering the quality of California wines.

With regards to Napa Valley areas such as Wooden Valley, Gordon Valley, Pope Valley, and Berryessa Valley, these small geographic areas should be included in the Napa Valley appellation, because, in my humble opinion, they all help to contribute in some way a "character" that is unmistakably a Napa Valley taste, or style.

Thank you for your attention to my letter. If there are any questions you might have for me, please feel free to contact me.

Respectfully,



Steve Situm



Virginia Imports, Ltd.

June 18, 1980

Director
Bureau of Alcohol, Tobacco
and Firearms
Department of Treasury
Washington, DC 20220

Dear Sir:

We have been made aware that there is consideration to eliminate the NAPA VALLEY wine description.

As a wholesaler of many California wines, we are able to effectively communicate with our retail customers as it relates to Amodore County, Sonoma County, Napa County, Pope Valley or Napa Valley, etc.

The designation Napa Valley, reflects a certain quality expectation and commonality in understanding. We urge you to continue to allow that designation.

We attach an interesting article which in part substantiates the above, as it relates to the consumer level, which of course is the prime consideration.

Very truly yours,

VIRGINIA IMPORTS, LTD.

Conrad E. Koneczny
Conrad E. Koneczny
President *ck*

CEK/cj

enclosure

Department of Microbiology and Immunology
School of Basic Medical Sciences, College of Medicine

UNIVERSITY OF ILLINOIS AT THE MEDICAL CENTER, CHICAGO

P.O. Box 6998 · Chicago, Illinois 60680

June 4, 1980

Mr. G. R. Dickerson
Director, BATF
P. O. Box 385
Washington, D. C. 20044

Dear Mr. Dickerson:

Re: Notice No. 337

The enclosed is self-explanatory. I hope it will interest you.

Yours sincerely,



Dr. Ed

enc.



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June 22, 1980

Director, BATF
Department of the Treasury
Washington, D.C.

Dear Sir:

Although I do not presume to speak for the entire membership, I feel confident that a great portion of our members would agree that "Napa Valley" is worthy of its own appellation of origin. The fact that the Napa Valley includes different micro climates should under no circumstances prevent this area from having the right to proclaim itself on labels when the final regulations by BATF are made.

The use of the "Napa Valley" appellation does not, and should not, prevent a winery or grower from listing a specific vineyard on the label should he so desire. As more and more experimentation is done, we may well find ourselves as consumers looking for specific vineyard labels. This is already happening as you well know with the many vineyard designations at Chateau St. Jean.

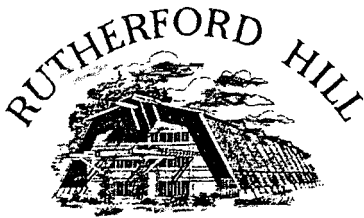
As a person who has more than 40-years experience in visiting the valley (Stanford '42), I feel that the watershed formed by its surrounding ridges creates a well defined viticultural area whose definition is clearly understood.

Sincerely,

Jack E. Daniels
EXECUTIVE DIRECTOR

JED
jmp

cc: RJLevine
JThoreen



RUTHERFORD HILL WINERY P.O. BOX 410 ST. HELENA, CA 94574 - 707-963-9694

August 27, 1980

G.R. Dickerson
Director
Bureau of Alcohol, Tobacco, and Firearms
P.O. Box 385
Washington, D.C. 20044

Dear Mr. Dickerson:

It has just come to my attention that Dr. Wawszkiewics is blowing his trumpet again and has come up with an idea that's a real turkey. Apparently the Doctor wants to subdivide the Napa Valley vertically by creating an invisible plane at the 400 foot elevation level below which the wines could be called "Napa Valley", but above which they must bear the name "Napa Mountain". From his ivory tower, somewhere in the Great Plains of America, the good Doctor imagines a flat Napa Valley that obediently remains below 400 feet, and a U-shaped Napa Mountain about 85 miles long that dutifully rises up right alongside the 400 foot contour line.

Unfortunately the prevailing pressures that shaped the Napa Valley and the people who have been inhabiting it all these years forgot to consult the Doctor before creating its geography and history.

Geographically, the 400 foot contour line down in the southern reaches below Napa would be some 300 feet above the valley floor (where, in some spots, it is quite steep) and the north end of the valley, from Tubbs Lane on up, being completely flat, but above 400 feet, would have to be left out of the appellation region altogether. And Napa Mountain? Nobody ever heard of it.

Historically, the people whose homes overlook the Napa Valley have always believed they live in the Napa Valley, whether they live at St. Helena, Deer Park, Madrone Knoll, Diamond Mountain, Atlas Peak, Howell Mountain or any of the many volcanic knolls that dot the area. Furthermore, the millions of people who visit the Napa Valley each year and return home to sing its praises and tout its wines, don't differentiate between vineyards on the valley flats and the valley hillsides, nor do they divide the local residents into those who really do live in the Napa Valley and those hillside people who only think they do.

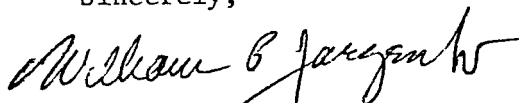
From a viticultural standpoint, if we adopt Dr. W's thinking we're going to have a difficult time with the vines at and around the 400 foot contour line which will have a schizophrenic existence having their roots in Napa Valley soils below 400 feet but baring their leaves to the rarified air on Napa Mountain.

Considering the radical nature of his proposal and the fact that no one from Napa County joined in on the idea, it seems appropriate to suggest that the Doctor be asked to petition for a Napa Mountain viticultural appellation, if he wants it, then see if anyone shows up at the hearings.

Incidentally, the Doctor does concede that even his dictionary reports the secondary meaning of "valley", condoning the identity between "Napa Valley" and the area drained by the Napa River and its tributaries. So who's standing the dictionary on its head?

Although this letter may not be timely as a part of the official Napa Valley appellation record, I am entitled to petition my government not be be influenced by ridiculous ideas like Napa Mountain.

Sincerely,

A handwritten signature in cursive script that reads "William F. Jaeger, Jr." The signature is written in dark ink and is positioned above the printed name.

William F. Jaeger, Jr.

WPJ:mo