November 11, 2005

Alcohol and Tobacco Tax and Trade Bureau
c/o Ms. Nancy Sutton
925 Lakeville Street, #158
Petaluma, CA 94952

VIA FEDERAL EXPRESS 415-271-1254

Department of the Treasury
Chief, Regulations and Procedures
Alcohol and Tobacco Tax and Trade Bureau
Attention Notice 34
PO Box 14412
Washington DC 200044-4412
Facsimile: 202-927-8525
Email: nprm@ttb.gov

Re: Response to Request for Evidence for Extension of Northern Boundary of Proposed Fort Ross Seaview AVA

Dear Nancy:

This letter is in response to your request of September 29, 2005 for documentation and information to support the realignment of the northern boundary of the proposed Fort Ross Seaview AVA. Enclosed find:

1.) evidence in the text of this letter and attached amendments that the proposed expansion area has similar growing conditions to the proposed area,
2.) evidence that the suggested AVA name applies to the entire area as amended,
3.) a written boundary description for the amended viticultural area in clockwise rotation, and
4.) USGS printed Quadrangle Maps with proposed boundaries.

Introduction

We are in favor of the establishment of the proposed viticultural area, which is necessary in order to allow consumers to better understand the wines from this unique area, and to easily distinguish them on store shelves and wine lists from wines originating elsewhere in the large Sonoma Coast appellation. However, as this letter will show, the characteristics of the area described by the petitioner apply equally well to the area north of his proposed boundary. Therefore, in accordance with TTB's regulatory mandate, and in fairness both to consumers and to the growers north of the proposed boundary, the new appellation should be expanded as requested below.

In this letter, we will refer to the original proposed area as "the petitioned AVA," the area we are requesting to be added to the new AVA as "the northern expansion area," and the combined areas as "the amended viticultural area."

The amended viticultural area will contain approximately 28 commercial vineyards on roughly about 900 acres. See the amended viticultural area boundary map attached as **Exhibit A, Boundary and Elevations Map**. Note that, in addition to the map enclosed as Exhibit A, we have also submitted USGS maps with the proposed amended viticutural area's boundary prominently marked.

Growing Conditions

- **Climate**

The petition states that climate is the most defining feature of the area. It emphasizes that because the petitioned AVA is largely within the band of greatest fog intrusion in Sonoma County and is so close to the coast, it was traditionally assumed to have a climate that was too cold for commercial viticulture. Only within the last few decades have intrepid growers found that inland hills and ridges in the area receive sufficient climatic support to ripen grapes, due to a combination of their elevation, their slope, and the protection of intervening ridges. These terrain features allow the area to enjoy the crisp coolness of coastal proximity, while they mitigate the excessively chilling effect of marine fog and lengthen the growing season by reducing the risk of frost.

The petition documents the viticultural feasibility of the area's climate by citing degree day summations for two vineyards in the petitioned AVA, showing that (using the UC Davis scale) they achieve a high Region I/low Region II climate. According to the petitioner, this identifies the area's climate as "Coastal Cool," not "Marine," within the climate classification first developed for Sonoma County by Robert Sisson during his long tenure as County Agriculture Advisor.

The "Coastal Cool" climate type was defined by Sisson as a climate which experiences 800 to 1,100 hours between 70° and 90° F (the optimal temperature range for plant photosynthesis) during the April through October growing season. Sites in the "Coastal Warm" climate type experience over 1,100 hours in that temperature range. Sites in the "Marine" climate type experience fewer than 800 hours between 70° and 90° F.

In terms of the more widely used Amerine and Winkler climate regions based on "degree day" summations, Coastal Cool sites are considered to be those with degree day accumulations in the higher Region 1 (<2500 degree days) and lower Region II (2500 – 3000 degree days) classifications.

By both of these empirical measures, the climate in the northern expansion area falls in the Coastal Cool region of Sonoma County. Climate data for a vineyard in the northern expansion area is displayed below in **Table 1**.

Table 1 — Coastal Cool Climate at La Crema Vineyard

Year	Degree Days	# of Hours between 70° - 90°
2003	2511.95	979.75
2004	2647.15	1098.00

Table 2 below compares accumulated degree days for three vineyards in the petitioned AVA and a vineyard in the northern expansion area. All four vineyards have a comparable, Coastal Cool climate.

Table 2 — Total Degree Days at Four Vineyards in the Amended Viticultural Area

Vineyard	Location	Degree Days	Time Period
Jordan Vineyard	Petitioned AVA	2605	growing season 1999
Campmeeting Ridge	Petitioned AVA	2615	four years' average
Nobles Vineyard	Petitioned AVA	2580	growing season 1999
La Crema Vineyard	Northern area	2580	two years' average

As additional evidence that the petitioned AVA should be classified as predominantly "Coastal Cool," the petitioner submitted a map based on Sisson's climate research, as Map 3 in the petition's Exhibit B (Vassen, Climate Types of Sonoma County Map, 1986). The Vassen map would also include all of the vineyards in the proposed northern expansion area within the "Coastal Cool" classification. See **Exhibit B,** a vineyard map of the northern expansion area upon which climate boundary lines from the Vassen map have been overlaid.

In addition, the petition compares average mean temperatures, daytime high temperatures, and nighttime low temperatures during the growing season at Campmeeting Ridge Vineyard in the petitioned AVA (elevation 1220 feet above sea level) and at Ft. Ross Historical Park (elevation 112 feet above sea level). Specifically the data presented by the petitioner showed that temperatures are roughly comparable at the Fort Ross coastal site and Campmeeting Ridge for the coolest part of the year, but that there is a distinct increase in daytime high temperatures at the vineyard in the warm summer months. The petition cites the empirically-measured difference as evidence that the petitioned AVA enjoys protection from marine fog intrusions, which are heaviest in the warm summer months. While the fog is most intense on the coast, the petitioned AVA is warmer because it is elevated above the fog and because fog intrusion into the area is blocked by coastal ridges of up to 920 feet or higher that lie between the petitioned AVA and the coast.

We have done the same analysis with temperature data from La Crema Vineyard (a site with elevations up to 785 feet) in the northern expansion area, and achieved similar results. The data are shown in tabular form in **Table 3** and **Table 4** below and shown in chart form in **Exhibit C**.

Daytime temperatures at La Crema Vineyard are similar to those at Fort Ross during months of the year in which little fog occurs. A dramatic difference in daytime temperatures can be noted during June through September, when the marine fog intrusion is greatest. Meanwhile, the average low temperatures remain similar at the coast and at the vineyard throughout the growing season, because the warming effect of increased solar radiation enjoyed during the daytime does not occur during the nighttime.

Table 3 - - Average Monthly Temperature
2002 – 2004 Growing Seasons

Month	Fort Ross	La Crema
April	50.4	52.1
May	53.7	58.0
June	56.0	65.1
July	57.2	66.6
August	59.4	65.7
September	58.4	65.4
October	54.2	58.4

Source: National Climatic Data Center, La Crema Vineyard

Table 4 — Average Monthly High and Low Temperatures
Between Fort Ross and La Crema in 2004

Month	Average High		Average Low	
	Fort Ross	La Crema	Fort Ross	La Crema
April	63.0	68.7	43.6	42.5
May	65.0	71.5	45.2	46.1
June	68.5	78.5	47.5	50.1
July	65.5	79.5	49.5	50.9
August	69.6	81.7	50.2	52.4
September	71.1	82.9	48.6	50.1
October	65.4	71.1	45.6	45.6

Source: National Climatic Data Center, La Crema Vineyard

The terrain of the proposed viticultural area is an important component of its distinctive climate. The many hills and ridges in this northernmost area of Sonoma Coast AVA heavily influence the climate of the area by blocking or slowing the intrusion of marine fog. Also, as in the Fort Ross Seaview area as a whole, the mountainous terrain permits nighttime cool air to drain from ridgetops and hillsides, extending the growing season and greatly reducing the risk of springtime frost.

TTB Notice 34 states, correctly, that "marine influenced fog rarely rises above the 900 foot elevation line in this Pacific coastal region." It is significant, therefore, that the first ridgeline east of the Pacific Ocean, which defines the western boundary of both the petitioned AVA and the northern expansion area, lies at an elevation of 920 feet or higher. Therefore, in both the petitioned AVA and the proposed expansion area, plantable areas at elevations less than 900 feet are protected from the cooling effects of marine fog intrusion by the 920 foot or higher western boundary between vineyards and the Pacific marine fog.

In the following passage, quoted from the boundary justification section of the Fort Ross Seaview petition, the petition itself justifies our contention that the lower elevation hills in the northern expansion area share the same climate as the petitioned AVA:

> *"... elevations below 920 feet ... have not been excluded for two reasons. First, the farther inland one goes, the more geographical barriers influence the intrusion of fog into the area.... Several protected valleys may actually experience very little fog, although experience the cooling effects from the nearby fog bank. These exceptions essentially mimic the overall characteristic of the appellation itself, free of morning and evening fog while still cooled by coastal influences. Second, as the western boundary primarily distinguishes between areas of viable and non-viable commercial viticulture, a slightly more inclusive approach to boundary designation is justifiable."*

In addition, petitioner's Exhibit B at page 13 acknowledges that sunnier warmer weather due to a lack of marine influence is possible, at elevations of 800 feet or lower, when it states:

> *"The recommended boundary then follows the House Creek tributary to the 800 foot elevation line. A lower elevation has been selected here as the more inland location decreases the frequency of fog intrusion. Nevertheless, the area still experiences some Pacific cooling effects."*

- **Soils**

The Petition relies on the United States Department of Agriculture, *Soil Survey of Sonoma County, California* (Reprint 1990) when discussing soils in the petitioned AVA. This response to the TTB request for information, likewise, relies on the USDA *Soil Survey of Sonoma County* in its statements of fact and maps.

In summarizing the soils evidence in the petition, the petitioner downplayed the importance of soil as a defining characteristic, saying,

> *"Despite the ability to make generalizations, on a local level the varied nature of the soils makes difficult any argument that a single soil characteristic is directly related to an encompassing characteristic for wines from the area."*

Although no single characteristic can be used to describe the proposed appellation, the general descriptions of the soils of the area given in the petition apply equally to the northern expansion area as to the petitioned AVA.

The petition states that a variety of soil types are found in the Fort Ross Seaview area. According to the petition, a predominant soil type is the Hugo series. **Table 5** below confirms that the Hugo series* is the predominant soil type in the proposed appellation, and shows that it is also predominant in the northern expansion area.

Table 5 — Occurrence of Hugo Series Soils in Revised AVA

Area	Percentage
Petitioned AVA	54%
Northern expansion area	45%

**includes Hugo soils and soil complexes in which Hugo soils is the predominant component*

Although Hugo is abundant in both areas, both the petitioned AVA and the proposed expansion area have a large variety of soils. The soils series common to both the northern expansion area and the petitioned AVA include Hugo, Goldridge, Yorkville, Josephine, and Laughlin. Petitioner's Exhibit B Table 3 lists all of the foregoing soils as present in the Petitioned AVA. The most common soils series in the northern expansion area also cover about 85% of the petitioned AVA area. (See Soils Map, **Exhibit D**, which shows the coverage of common soil series in the northern expansion area and the petitioned AVA.) The common soils series contain soils of both sedimentary and metamorphic origin in both the northern expansion and petitioned AVAs, and these soils series are well drained and lack alluvium.

Petitioner's Exhibit B states that, "Soils of sedimentary parent material are the most common in this part of Sonoma County" and that metamorphic soils are "not uncommon in the area, especially east of the San Andreas Fault". (Petitioner's Exhibit B at Page 10); The Soils Survey of Sonoma County and maps developed by the Division of Mines and Geology show that the most common soils are of sedimentary parent material in both the petitioned AVA and in the expansion area and that soils of metamorphic parent material, although not uncommon, are not as common as the sedimentary soils in either the petitioned AVA or the expansion area. (The conclusion in Notice 34 that Petitioner had emphasized that the majority of soils in the proposed area were of metamorphic origin is

not supported by Petitioner's Exhibit B soils discussion or by the Sonoma County Soils Survey or Division of Mines and Geology Maps and is apparently a result of a misreading of Petitioner's Exhibit B Soils discussion.)

Soils Map 4 to Petitioner's Exhibit B (attached hereto as **Exhibit E**) illustrates the dominant soils of the petitioned AVA and its surroundings. As shown on Petitioner's map, the pattern of soil distribution in the northern portion of the petitioned AVA, is identical to that depicted in the northern expansion area. Therefore, it is logically impossible to take a position in favor of excluding the northern expansion area on the basis of soils.

- **Topography**

The topography of the northern expansion area ~~to the north~~ is similar to the topography of the petitioned AVA. It has steep, mountainous terrain with valleys, ridges, and peaks that rise to 1500 feet in elevation, with slopes ranging from 5% to 70%. The western boundary of both the northern expansion area and the petitioned AVA follows the first ridgeline east of the Pacific Ocean and runs parallel to and east of the San Andreas Rift Zone at an average distance of approximately 1.5 miles from the coast. As mentioned above, the western boundary of both the petitioned AVA and proposed expansion area boundary is generally at an elevation of 920 feet or higher. Because marine fog rarely rises above the 900 foot elevation line in this Pacific coastal region, plantable areas at elevations less than 900 feet in both the petitioned AVA and the proposed expansion area are protected from the cooling effects of marine fog intrusion by the 920 foot or higher western boundary between vineyards and the Pacific marine fog. Thus, sites at elevations of less than 900 feet support viable commercial viticulture. The various climate evidence presented above, including empirical weather data and the Vassen map, confirms that vineyards in the northern expansion area at elevations of less than 800 feet are "Coastal Cool," not "Marine," in climate, like those in the petitioned AVA.

Existing vineyards in the northern expansion area are planted at up to 880 feet in elevation, and plantable acreage in the petitioned AVA exists at about the same elevation and lower. (For example, see **Exhibit A, Boundary and Elevations Map**, showing the Nobles and adjacent parcels with elevations at 840 feet.) In addition, the northern boundary of the petitioned AVA dips to include land at an elevation of about 240 feet along Haupt Creek. Other locations of 800 feet or less within the petitioned AVA are designated on the attached **Exhibit A.**

As stated above, TTB Notice 34 correctly notes that "marine influenced fog rarely rises above the 900 foot elevation line in this Pacific coastal region." Because the western boundary elevation is generally 920 feet or higher in both the petitioned AVA and the proposed expansion area, plantable areas at elevations less than 900 feet are protected from the cooling effects of marine fog intrusion in both the petitioned AVA and the expansion area.

Sites at elevations of less than 900 feet support viable commercial viticulture. The various climate evidence presented above, including empirical weather data and the Vassen map, establishes that vineyards in the northern expansion area at elevations of less than 800 feet are "Coastal Cool," like those in the petitioned AVA.

Name

- **The Petitioned AVA and Expansion Area are Both Located in the "Fort Ross Region"**

The area of the Amended Petition is commonly known as the "Fort Ross Region" both nationally and locally. The association of the name Fort Ross with the entire Sonoma County coastline north of the mouth of the Russian River dates back to the establishment of the fort during the Russian occupation.

Attached is **Exhibit F**, which contains excerpts and maps from a University of California at Berkeley publication entitled *"The Archeology and Ethnohistory of Fort Ross, California"* (1991). This publication is on file at the Sonoma County Public Library. Chapter Three, *The Natural Environment of the Fort Ross Region*, includes a map (Figure 3.1) that encompasses both the petitioned area and the northern expansion area within the "Fort Ross Region." In Chapter Three and various other chapters, the text in this document refers to the area within the boundary of the amended viticultural area as the "Fort Ross Region" multiple times. This exhibit clearly shows that the name Fort Ross applies to the petitioned AVA and also to the entire northern expansion area.

The document cited in Exhibit F explored in depth the effects of the Russian occupation of Sonoma County on the local Native American population. It clearly and precisely defines its study area — which extends from the mouth of the Russian River north to the mouth of the Gualala River — as the "Fort Ross Region," and persuasively supports its reasons for identifying the entire area by that name. Portions of the text that describe the extent and identity of the Fort Ross region have been included and highlighted in the exhibit.

Figure 3.1, reproduced in **Exhibit F**, shows the physical extent of the Fort Ross Region. **Exhibit F** also contains the following narrative description of the region's boundaries, from page 29 of the UC Berkeley document:

> *"The western boundary of the Fort Ross Region is a 50 km stretch of rocky coastline that extends from the contemporary towns of Gualala in the north to Jenner in the south. The North Fork of the Gualala River and the Russian River are the northern and southern boundaries of the region, respectively. The eastern boundary parallels the coast about fifteen km ... into the rugged terrain of the North Coast ranges, depending on the shape of the coastline."*

Fort Ross continued to be associated with the same region even after the end of the Russian occupation. Two German immigrants, William Benitz and Charles T. Meyer, met when they both lived near Fort Ross, and established a partnership to acquire grazing land along the coast. (Benitz was working for John Sutter, who was at the time the owner of Fort Ross.) In 1849, Benitz and Meyer obtained title to the German Rancho, a large land grant of over 9,000 acres lying between the Pacific Ocean and the Gualala River, along the northernmost coastline of Sonoma County. Two years later they purchased the Muniz Rancho from Manuel Torres (who had received the property from Mexican authorities after the Mexicans ousted John Sutter in 1846). In that transaction, Benitz and Meyer gained title to the old Russian fort at Fort Ross and 17,500 acres adjoining it.[1] At that time, their combined holdings of over 30,000 acres encompassed an area very similar in extent to the area described as the Fort Ross Region in **Exhibit F**.[2] See **Exhibit G**, a historic map showing the German Rancho and the Muniz Rancho, both of which were owned by Benitz and Meyer.

Financial troubles forced Benitz and Meyer to begin selling off property in the mid-1850's. They sold their more northern holdings and retained ownership of the property around Fort Ross. In 1867, Fort Ross was sold to Charles S. Fairfax and John Dixon, who developed a large-scale lumber industry there. After the death of Fairfax, the property was sold to George Washington Call in 1873. During his ownership of the property, Fort Ross became one of the most active small shipping, communications, and business centers along the Northern California coast. The Call family operated a weekly schooner that ran between Fort Ross and San Francisco.[3] Undoubtedly motivated by the desire to expand his sphere of trade northward, Call hired Chinese laborers to build the first road to the northern reaches of the Sonoma County coast in 1874-5.[4] This road, running northward from Fort Ross, finally united the entire area that had been recognized under Russian occupation as the Fort Ross Region, and that we now request TTB to recognize as the amended viticultural area.

- **The Name Fort Ross-Seaview Applies as Appropriately to the Expansion Area as to the Petitioned AVA**

The above recent evidence and information, including maps, undeniably show that the name Fort Ross applies to the northern expansion area as well as to the petitioned AVA. The amended viticultural area may legitimately be called Fort Ross-Seaview AVA because it encompasses within its borders two physical features bearing the name

---

[1] Diane Spencer-Hancock, "Fort Ross: Indians, Russians, Americans," p. 24

[2] Susan M. Clark, "The Del Mar Ranch: From the German Rancho to The Sea Ranch, California, 1845 to 1964," p. 31-33

[3] Diane Spencer-Hancock, *ibid*, p. 25

[4] Susan M. Clark, *ibid*, p. 1

Seaview: Seaview Road and the community of Seaview. Although the vineyards in the northern expansion area lie at some distance from the tiny coastal community of Seaview and Seaview Road, so also do most of the vineyards in the petitioned AVA.

The petitioner admitted that, at the time the petition was submitted, the only written references ever made to the combined name Fort Ross-Seaview were in documents he wrote or commissioned to accompany the petition. The combined name Fort Ross-Seaview was coined by the petitioner; he then secured the agreement of some of the growers in the petitioned AVA that they would start uniformly using it to refer to the area. The growers in the expansion area were not included by petitioner in appellation committee meetings.

The petitioner stated that the two names were chosen because in verbal conversation growers would at times refer to one or the other of these geographical points in attempting to describe the location of their vineyard to others, and would sometimes mention both landmarks. In a sparsely populated area with few widely recognized landmarks, it is natural to mention one or more relatively well-known places when trying to describe a remote site located on a relatively untraveled road. Also, although it was not mentioned by the petitioner, it is significant that the use of the name Fort Ross by itself would conflict with the trademark of an existing winery in the area, so it was necessary that a second, modifying name be added to the proposed name of the new appellation.

- **Other Possible Names for the Amended Viticultural Area**

We agree that the name Fort Ross should be maintained as at least part of the name of the proposed appellation, along with an acceptable modifier, as it is a unique and well-known name used for no other locations in the country. If there is any question about the appropriateness of the name Seaview for the amended viticultural area encompassing the northern expansion area and several vineyards in the petitioned AVA lying at significant distance from Seaview, other prominent landmarks in the northern Sonoma Coast area, such as **Stewarts Point**, or **Annapolis**, could be considered for use as modifying names to be added to Fort Ross for the proposed amended area. Alternatively, Fort Ross may be modified with the word "Region," or the name Fort Ross Region could be combined with the larger appellation name Sonoma Coast, as "Sonoma Coast Fort Ross Region" or "Fort Ross Region - Sonoma Coast."

If TTB would prefer to use a name that does not in any way infringe upon or impair an existing trademark (both "Fort Ross" and "Seaview" are contained in existing brand names), we have found substantial evidence that the names "North Sonoma Coast" or "Northern Sonoma Coast" are used to refer to the amended viticultural area, and we would be happy to submit such evidence promptly at your request.

Boundary

1. The beginning point is on the Arched Rock map at the intersection of the 920-foot elevation line and Meyers Grade Road, T8N, R12N. From the beginning point, the boundary line proceeds northwest on Meyers Grade Road about 4.3 miles to the road's intersection with Seaview and Fort Ross Roads, T8N, R12W (Fort Ross Quadrangle); then
2. Continues northwest on Seaview Road about 6.4 miles to its intersection with Krause Ranch and Hauser Bridge Road in the south east corner of section 28, T9N, R13W (Plantation Quadrangle); then
3. Continues west on Krause Ranch Road about 0.2 miles to the intersection with the 920-foot elevation line, T9N, R13W (Plantation Quadrangle); then
4. Proceeds northerly then easterly along the 920-foot elevation line about 2.2 miles to its intersection with Hauser Bridge Road, section 27, T9N, R13W (Plantation Quadrangle); then
5. Proceeds east on Hauser Bridge Road about 1.5 miles to its intersection with the 920-foot elevation line, section 23, T9N, R13W (Plantation Quadrangle); then
6. Proceeds northwesterly, then easterly, then northwesterly along the 920-foot elevation line to its intersection with Miller Ridge Road, section 26, T10N, R14W (Stewarts Point Quadrangle); then
7. Proceeds northwesterly along Miller Ridge Road to its junction with the eastern boundary of section 22, T10, R14W (Stewarts Point Quadrangle); then
8. Proceeds northeasterly, then northerly along the eastern boundary of sections 22 and 15, crossing the Wheatfield Fork of the Gualala River, to the section line's intersection with Annapolis Road, T10N, R14W (Stewarts Point Quadrangle); then
9. Proceeds northeasterly, then easterly along Annapolis Road to its intersection with an unnamed, unimproved road that forks to the north from Annapolis Road just northeast of Benchmark 837, section 11, T10N, R14W (Stewarts Point Quadrangle); then
10. Follows the unimproved road until it intersects with the eastern boundary of section 11, T10N, R14W (Stewarts Point Quadrangle); then
11. Proceeds northerly along the section line until it intersects with the second unnamed, unimproved road in section 11, T10N, R14W (Stewarts Point Quadrangle); then
12. Proceeds westerly along the unnamed road until it intersects with Brushy Ridge Road in section 11, T10N, R14W (Stewarts Point Quadrangle); then
13. Proceeds westerly, then northerly, then easterly along Brushy Ridge Road until it intersects with an unnamed, unimproved road near the center of section 2, T10N, R14W (Stewarts Point Quadrangle); then

14. Proceeds easterly along the unnamed road, paralleling Buckeye Creek, until it intersects Kelly Road in section 1, T10N, R14W (Annapolis Quadrangle); then

15. Proceeds easterly along Kelly Road to its intersection with Soda Springs Road in section 6, T10N, R14W (Annapolis Quadrangle); then

16. Proceeds southerly along Soda Springs Road, across Grasshopper Creek in section 8, T10N (Annapolis Quadrangle), to a fork in the road just east of the creek; then

17. Follows the most easterly fork in a southerly direction, straight past where the pavement ends, and continues southerly until it ends at a "T" shaped intersection; then

18. Turns left onto another unnamed, unimproved road and proceeds in a northeasterly direction to the first intersection with another unnamed, unimproved road going off to the east; then

19. Turns right and follows the unnamed, unimproved road in a generally southerly direction in section 17, T10N, R13W, taking the most easterly fork where the road forks near the center of section 17, to its intersection with another unnamed, unimproved road; then

20. Makes a hairpin right turn quickly followed by a lefthand turn and continuing on an unnamed, unimproved road in a southerly direction through the northeast portion of section 20, the northern portion of section 21, and the western portion of section 22, to its intersection with an unnamed, unimproved road near the center of section 22, T10N, R13W (Annapolis Quadrangle); then

21. Makes a hairpin righthand turn onto the unnamed road in a westerly direction and continuing to the top of an unnamed hill of 862 foot elevation in section 21, T10N, R13W (Annapolis Quadrangle); then

22. Proceeds in a straight line south southeast to the northernmost point of the 600 foot contour line in the northeast corner of section 28, T10N, R13W (Annapolis Quadrangle); then

23. Follows the 600 foot contour line south southwesterly to its intersection with Annapolis Road in section 33, T10N, R13W (Annapolis Quadrangle); then

24. Follows Annapolis Road south then east to its intersection with Stewarts Point/Scaggs Spring Road; then

25. Proceeds easterly to its intersection with an unnamed, unimproved road that forks to the south in section 33, T10N, R13W (Annapolis Quadrangle); then

26. Follows the unnamed road southeast through section 33, T10N, R13W, and through sections 4, 3, 2, 1, and 12, T9N, R13W, (Annapolis Quadrangle), into section 12, T9N, R13W, (Tombs Creek Quadrangle), passing between the Annapolis and Toombs Creek maps as the unnamed meanders southward, to its intersection with the 1200-foot contour line in section 13, T9N, R13W (Tombs Creek Quadrangle); then

27. Proceeds southeasterly along the 1,200-foot elevation line about 0.6 mile its intersection with Allen Creek, section 18, T9N, R12W (Tombs Creek Quadrangle); then

28. Follows Allen Creek north about 0.2 mile to its intersection with the 920-foot elevation line, section 18, T9N, R12W (Tombs Creek Quadrangle); then

29. Proceeds easterly and then southeasterly along the meandering 920-foot elevation line to its intersection with Jim Creek, south of a 1,200-foot plateau named The Island, section 21, T9N, R12W (Fort Ross Quadrangle); then

30. Follows Jim Creek southeast about 0.7 mile to its intersection with the northern boundary of section 27, T9N, R12W (Fort Ross Quadrangle); then

31. Proceeds along the northern boundary of section 27, T9N, R12W, to the northeast corner of that section (Fort Ross Quadrangle); then

32. Proceeds south along the eastern boundaries of sections 27 and 34, T9N, R12W, and continues south along the eastern boundaries of sections 3, 10, 15, and 22, T8N, R12W, to the intersection of the eastern boundary of section 22 and Fort Ross Road (Fort Ross Quadrangle); then

33. Proceeds east a short distance on Fort Ross Road to the road's intersection with the Middle Branch of Russian Gulch Creek, and then follows the creek south for about 1.2 miles to the creek's intersection with the 920-foot elevation line, east-southeast of the Black Mountain Conservation Camp, section 26, T8N, R12W (Fort Ross Quadrangle); then

34. Proceeds southerly along the meandering 920-foot elevation line about 8.1 miles, passing between the Fort Ross and Arched Rock maps as the 920-foot elevation line meanders north then south around the West Branch of Russian Gulch, and returns to the beginning point at Meyers Grade Road, T8N, R12W (Arched Rock Quadrangle).