BENNETT VALLEY VITICULTURAL AREA

The proposed Bennett Valley viticultural area is located entirely within Sonoma County, California. It is a essentially a sub-appellation of the Sonoma Valley viticultural area, but it extends slightly beyond Sonoma Valley AVA into Sonoma Coast AVA in one small area. It also partially overlaps the Sonoma Mountain viticultural area. The proposed area consists of approximately 8100 acres, of which around 650 acres are currently planted to grapes. There are currently two bonded wineries in the proposed area.

Differences in topography, soils, and climate distinguish the proposed Bennett Valley viticultural area from the surrounding region. The proposed Bennett Valley appellation is located in the foothills of the Sonoma Mountains. It contains a small valley and the surrounding uplands comprising the watershed of Matanzas Creek. Most of the proposed boundary follows ridge lines from peak to peak, as is appropriate when defining a watershed area. On the northwest the proposed boundary coincides with the Sonoma Valley viticultural area boundary (which approximates the city limits of Santa Rosa). The northwestern boundary also coincides with topographic changes in the valley floor.

This petition describes the distinct geographical factors and historical heritage of the Bennett Valley viticultural area in detail, demonstrating that the proposed area is a geographically unique grape-growing region under the definition set forth in 27 CFR 4.25a (e) (1). In order to enable wineries to designate grapes originating from this unique area, so that consumers may make informed decisions as to the wines they purchase, it is appropriate that the Bennett Valley be established as an American Viticultural Area in accordance with 27 CFR Part 9.

This petition was prepared by Compliance Service of America on behalf of the petitioners whose names appear on the signature pages attached to the end of this document.

Distinguishing physical features

Distinguishing topography

The proposed Bennett Valley viticultural area is comprised of a small, picturesque valley floor ringed by rolling upland hills and the surrounding Sonoma Mountain Range. The proposed viticultural area lies southwest of, and roughly parallel, to the main arm of Sonoma Valley. Bennett Valley is defined by Bennett Mountain and its foothills on the northeast, Taylor Mountain and the Santa Rosa city limits on the northwest, Bennett Ridge and Sonoma Mountain on the east, and the ridge between Taylor Mountain and Sonoma Mountain, separating Sonoma Valley from Petaluma Valley and the watershed of Matanzas Creek from the watershed of Petaluma Creek, on the south and southwest. See the map at Exhibit 1.A. for location and proposed boundaries.

The valley, together with the surrounding hills and mountains that enclose it, comprise the watershed of Matanzas Creek, a small tributary of Santa Rosa Creek. Although this makes the area technically part of the Russian River drainage system, Bennett Valley was included in the Sonoma Valley appellation when that viticultural area was established, because its soil and climate is more similar to Sonoma Valley than to Russian River Valley, and because of its geographic isolation from the other grape growing areas of the Russian River Valley.

The lowest point in the proposed viticultural area is 250 feet in elevation, while the highest is approximately 1850 feet. The majority of the proposed area lies between 470 and 870 feet in elevation (see **Table 1**, below). Most of the vineyard acreage is planted at 500 to 600 feet in elevation, but grapes are planted on the slopes of Taylor Mountain and Sonoma Mountain as high as 1100 feet. See the map at **Exhibit 1.B.**, showing physical relief in the proposed AVA and vicinity.

TABLE 1: Elevations within Proposed Area

Elevation	Percentage of proposed area
Under 470 feet	13%
470 feet to 670 feet	30%
670 feet to 870 feet	27%
870 feet to 1075 feet	18%
Above 1075 feet	12%

At its western end, Bennett Valley is open to the Santa Rosa valley. The portion of the geographic valley lying within the Santa Rosa city limits and outside the Sonoma Valley AVA is almost flat and relatively broad. Upon entering the

proposed appellation one begins to feel a sense of enclosure by the peaks and foothills of Bennett Mountain, Taylor Mountain, and Sonoma Mountain that envelop the valley floor. On the Taylor Mountain side of the road, the elevation rises quickly; the small valley floor area lies primarily on the Bennett Mountain side. (See Exhibit 9.D., Sub-areas Map from Sonoma County's Bennett Valley Area Plan, for a confirmation of how small the valley floor proper is, in the context of the entire area known as Bennett Valley.)

Traveling eastward along the valley's main artery, Bennett Valley Road, the elevation slowly rises, from 300 feet near the mouth of the appellation to around 1,000 at the top of the road. Near the eastern end of the proposed appellation, Bennett Valley Road begins to rise more quickly in elevation toward the watershed boundary, and the hilly terrain encroaches more tightly on both sides of the road. Once cresting the ridge which divides the Matanzas Creek watershed from the Sonoma Creek drainage system, the road slowly descends and the sense of topographic enclosure quickly decreases as the foothills on the north recede from the road. By the intersection with Enterprise Road, the Bennett Mountain foothills have diminished to the point that the valley once again feels quite open. These changes are visible in **Exhibit 2**, which shows photos of the area and vicinity.

Southwestern boundary. Bennett Valley's southwestern border deviates slightly from the portion of the southwestern boundary of the Sonoma Valley viticultural area where it follows a straight line between Sonoma Mountain and Taylor Mountain, approximating the highest ridgeline of the Sonoma Mountains separating Sonoma Valley from Petaluma Valley. For purposes of defining the Matanzas Creek watershed, we located the ridgeline more precisely in order to avoid dividing a vineyard that lies on the Sonoma Valley side of the mountains but is partly outside the current Sonoma Valley boundaries.

A topographical barrier to the cold, moist winds that blow across Petaluma Valley from the Pacific Ocean, the Sonoma Mountains provide most of Sonoma Valley viticultural area with a warmer, more sheltered climate — particularly the most protected "hot spot" near Glen Ellen, at the leeward base of the mountain.

A topographic gap in this ridge at Grange Road, which passes through a low spot between Taylor Mountain and Sonoma Mountain known as "Crane Canyon," allows cool coastal air to enter Bennett Valley directly from the Petaluma Valley. In contrast to the 1401 foot elevation at the peak of Taylor Mountain and the 2295 foot elevation at the peak of Sonoma Mountain, Grange Road crowns at about 760 feet at its highest point. The important effect of this gap on the microclimate in Bennett Valley is discussed later in more detail in the section on climate.

Bennett Valley's border again diverges from the Sonoma Valley AVA boundary before it reaches the peak of Sonoma Mountain. Here, the proposed boundary coincides with a portion of the southern boundary of Sonoma Mountain viticultural area, following the 1600 foot elevation line along the face of Sonoma Mountain.

Northwestern boundary. Bennett Valley's northwestern border coincides with the northwestern boundary of the Sonoma Valley viticultural area, where it follows the straight line between Taylor Mountain and the intersection of Los Alamos Road with Highway 12. This line excludes the lower elevations of the Santa Rosa valley from the proposed Bennett Valley appellation, which lies entirely at elevations of 250 feet and above. The geographical mouth of Bennett Valley, which is located outside of the proposed appellation, is not only lower in elevation than the petitioned area, but also flatter, broader, and more open on both sides than the valley floor within the proposed appellation.

The northwestern boundary line also approximates the city limits of Santa Rosa, and marks the nearest approach to the city's eastern outskirts of lands available for commercial viticulture.

Northeastern boundary. The northeastern boundary of the proposed area has been drawn along the ridgeline that delineates the northeastern boundary of the Matanzas Creek watershed. On the far side of Bennett Mountain, lands to the west of Oakmont drain out the west end of Sonoma Valley into Santa Rosa Creek, while lands to the east drain into Yulupa Creek and into Sonoma Creek, whose headwaters originate on the northeastern slopes of Bennett Mountain.

This boundary line also excludes most or all of Annadel State Park, a large recreational area covering most of the northern slopes of Bennett Mountain.

Eastern boundary. The eastern boundary of the proposed area has been drawn along the ridgeline that delineates the eastern edge of the Matanzas Creek watershed and separates the cooler, west-facing vineyards of Sonoma Mountain AVA from that appellation's warmer, east-facing vineyards. (See the discussion of the area overlapping Bennett Valley AVA and Sonoma Mountain AVA, pages 31-33, for more details.)

Conclusion. In summary, topographical differences between the proposed area and the surrounding region characterize its boundaries on all sides. The boundaries to the north, east, and south are defined by ridge lines marking the outer limit of the Matanzas Creek watershed. At its northwestern boundary,

Bennett Valley is differentiated from the lands beyond by a physical change in the elevation, flatness, and breadth of the valley.

Distinguishing soils

The soils of the proposed Bennett Valley viticultural area exhibit both valley and foothills characteristics. As has been mentioned earlier and is apparent from **Exhibit 9.D.**, a map showing sub-areas of Bennett Valley as defined in the Sonoma County Bennett Valley Area Plan, the valley floor proper covers only a small proportion of the area known as Bennett Valley.

The foothills soils are uplands soils of volcanic origin derived from the geologic heritage of the Sonoma Mountains, a complex series of lava flows and tuff beds that in places are interbedded with sandstone, gravel, and conglomerate. A variety of soils have formed from this parent material, varying from place to place depending on the weathering-resistance of the underlying material and the effects of terrain, climate, and vegetation acting upon it. In Bennett Valley and its vicinity, the soil in the foothills is comprised primarily of the Goulding-Toomes-Guenoc Association and associated soils.

The lower slopes and valley floor contain a more varied mix of soils, including soils of alluvial origin, as would be expected due to stream deposits of Matanzas Creek and other terrain-related factors.

The Goulding-Toomes-Guenoc Association occupies approximately 8% of Sonoma County, and according to the Sonoma County Soil Survey is normally comprised of 70% Goulding soils, 20% Toomes and Guenoc soils in equal parts, and 10% a mixture of the minor Boomer, Henneke, Josephine, Red Hill, Spreckels, and Supan soils in varying proportions. As will be described in more detail below, the occurrence of the Goulding-Toomes-Guenoc Association in the proposed appellation has a locally unique composition. The most notable departure from normal is the extremely high proportion of Spreckels loam soils. (See Table 2: Soils of Bennett Valley and Vicinity, on page 8.)

Goulding soils account for nearly half of the soils in the proposed area. Goulding soils are well-drained clay loams, underlain at a depth of 12 to 24 inches by metamorphosed basic igneous rock and weathered andesitic basalt of old volcanic formations. These soils are normally found on mountainous uplands, at elevations ranging from 500 to 2,500 feet, on slopes of 5 to 75%.

Spreckels loam soils comprise approximately one-fourth of the soils in the proposed area. Spreckels soils are well drained loams with a clay subsoil, underlain at a depth of 22 to 60 inches by volcanic tuffs mixed with uplifted river sediment and weathered, basic igneous rock. They are normally found on mountain foothills and terraces at elevations ranging from 300 to 2,000 feet, on slopes from 2 to 50%.

TABLE 2: Soils of Bennett Valley and vicinity, expressed as percent per acre

	(1)	(2)	(3)	(4)	(5)	(6)
SOIL TYPE	Sonoma	Los	Sonoma	Sonoma	Sonoma	Bennett
	Mtn top	Guillicos	Mt AVA	Mt East	Mt West	Valley
Goulding Clay	49.8	7.4	46.3	49.0	33.4	30.2
Loam						
Goulding Cobbly	3 <i>7</i> .0	43.1	12.2	10.8	19.0	18.5
Clay Loam						
Goulding-Toomes	2.6	5.6	1.6	2.0	-	1.5
Complex						
Haire Clay Loam	-			-	_	7.1
Haire Gravelly	-	0.4	-	-		0.6
Loam	F 1 2					
Laniger Loam	1.6	13.6	0.7	0.4	2.5	1.9
Red Hill Clay Loam		0.8	6.3	7.7	pr.	-
Spreckels Loam	0.3	1.0	27.4	24.4	41.8	24.0
Other	7.5	34.0	5.4	5.0	0.9	17.5

- (1) Sonoma Valley side of Sonoma Mountain, above Sonoma Mountain AVA
- (2) Foothills of Bennett Peak extending north to Highway 12 and east to Warm Springs Road
- (3) Sonoma Mountain AVA
- (4) Sonoma Mountain AVA excluding area of overlap
- (5) Proposed Sonoma Mountain AVA overlap with Bennett Valley AVA
- (6) Proposed Bennett Valley AVA

Variations in composition of Goulding-Toomes-Guenoc Association.

Goulding clay loam, Goulding cobbly clay loam, and Goulding-Toomes complex are the three types of Goulding soils found in the Goulding-Toomes-Guenoc Association. The percentage of Goulding-Toomes-Guenoc Association in the proposed appellation and each of the nearby areas of Sonoma Valley, as well as the composition of the association in each of the areas, varies as shown in **Table 3** and described in more detail below.

TABLE 3: Composition of Goulding-Toomes-Guenoc Association in Bennett Valley and vicinity

	(1)	(2)	(3)	(4)	(5)	(6)
SOIL TYPE	Sonoma	Los	Sonoma	Sonoma	Sonoma	Bennett
	Mtn top	Guillicos	Mt AVA	Mt East	Mt West	Valley
Goulding-Toomes-	89.4	56.1	60.1	61.8	52.4	50.2
Guenoc Assoc. as						
percent per acre						
Goulding Clay	56	13	77	79	64	60
Loam as percent of						
association						
Goulding Cobbly	41	77	20	18	36	37
Clay Loam as						
percent of			The state of the s			
association						
Goulding-Toomes	3	10	3	3	-	3
Complex as				*		!
percent of		1				
association						

In the proposed Bennett Valley appellation, 50.2% of the soils are Goulding soils, of which 60% is Goulding clay loam, 37% is Goulding cobbly clay loam, and only 3% is Goulding-Toomes complex.

In Area (1), the higher slopes of Sonoma Mountain, Goulding soils represent a significantly larger 89.4% of the soils, and the Goulding soil is slightly more evenly divided between clay and cobbly clay loam. 56% is Goulding clay loam, 41% is Goulding cobbly clay loam, and 3% is Goulding-Toomes complex.

In Area (2), Los Guillicos, Goulding soils represent 56.1% of the soils, but the proportions of clay and cobbly clay loam are reversed. Only 13% is Goulding clay loam, while 77% is Goulding cobbly clay loam (the dominant type in this area only), and 10% is Goulding-Toomes complex.

Area (3), Sonoma Mountain AVA, is more similar to the proposed Bennett Valley viticultural area, but the predominance of Goulding clay loam over cobbly clay loam is even more pronounced. Goulding soils represent 60.1% of the soils, of

which 77% is Goulding clay loam, 20% is Goulding cobbly clay loam, and 3% is Goulding-Toomes complex.

Looking at the two parts of Sonoma Mountain AVA (the northwest facing aspect and the northeast facing aspect), the distribution of soils in the area of overlap on the northwestern side of the mountain is very close to the distribution found in Bennett Valley overall, while the distribution on the northeastern side is very close to the distribution found in Sonoma Mountain AVA overall.

On the western side of Sonoma Mountain AVA, Goulding soils represent 52.4% of the soils, of which 64% is Goulding clay loam and 36% is Goulding cobbly clay loam. There is no Goulding-Toomes complex. On the eastern side of Sonoma Mountain AVA, Goulding soils represent 61.8% of the soils, of which 79% is Goulding clay loam, 18% is Goulding cobbly clay loam, and 3% is Goulding-Toomes complex.

Variations in occurrence of Spreckels loam. The high concentration of Spreckels loam in the proposed Bennett Valley AVA and in Sonoma Mountain AVA has already been discussed. In contrast, Spreckels loam accounts for less than 1% of the soils in Area (1), the higher slopes of Sonoma Mountain, and only 1% of the soils in Area (2), Los Guillicos.

Variations in occurrence of Laniger loam. According to the Sonoma County Soil Survey (p. 56), Laniger loam soils are often found in association with Spreckels soils. Laniger loams are well-drained soils found on mountainous uplands at elevations of 600 to 2,000 feet, on slopes of 5 to 50%. They are underlain at a depth of 18 to 45 inches by their volcanic parent material, weathered rhyrolite and rhyolitic tuff.

Significantly, even though Spreckels loam is prevalent in both the proposed Bennett Valley AVA and in the Sonoma Mountain AVA, Laniger loam accounts for less than 2% of the soils in Bennett Valley and less than 1% in Sonoma Mountain AVA. In contrast, however, Laniger loam accounts for 13.6% of the soils in Area (2), Los Guillicos.

Variations in occurrence of Haire loams. Haire clay loam is an alluvial soil type found in significant quantities on the Bennett Valley floor. It accounts for 7.1% of the soils present. There is a small amount of Haire gravelly loam, in addition. Haire soils are moderately well-drained clay loams found on terraces and rolling hills, at elevations of 100 to 800 feet, on slopes of 0 to 30%. These soils are underlain by old terrace-alluvium from mixed sedimentary and basic rock sources.

Analysis of the Sonoma County Soil Survey for all of the proximate areas of Sonoma Valley described above found no Haire loams outside of the proposed Bennett Valley sub-appellation.

Variations in occurrence of Red Hill clay loam. The northeast facing side of Sonoma Mountain contains a significant amount of Red Hill clay loam. Red Hill clay loams are moderately well-drained clay loams with a predominantly clay subsoil, found on ridgetops and mountain uplands at elevations of 500 to 2,000 feet and slopes of 2 to 75%. They are underlain at a depth of 30 to 60 inches by mixed greenstone and andesitic basalt rock.

7.7% of the soils of the eastern portion of Sonoma Mountain AVA is Red Hill clay loam. Red Hill clay loam is not found in the area of overlap between Sonoma Mountain AVA and the proposed Bennett Valley AVA, or in other parts of the proposed Bennett Valley viticultural area. Less than 1% is present in Area (2), Los Guillicos.

Variations in soil diversity. As mentioned earlier, there is a more diverse mix of soils on the Bennett Valley floor and lower slopes than in the foothill and mountainside portions of the proposed appellation. Examination of the proposed appellation as a whole reveals that 17.5% of the soils are of types not separately mentioned above because they are minor in proportion to the ones discussed. These include Clear Lake clay, Clough gravelly loam, Felta very gravelly loam, Los Robles gravelly clay loam, Pleasanton-Haire complex, Raynor clay, Toomes rocky loam, and 10.5% comprised of other more minor constituents.

The soil in the foothills and mountains area is less varied. In Area (1), the upper slopes of Sonoma Mountain, only 7.5% of the soil is comprised of minor types. In Sonoma Mountain AVA, 5.4% of the soil is minor types. (The eastern side of this appellation contains 5% minor types, while the western side contains less than 1% minor types.)

Area (2), Los Guillicos, with 34% of its soil comprised of types not specifically mentioned above, has twice the amount of minor soils as the proposed Bennett Valley viticultural area. These include Clear Lake clay loam, Clough gravelly loam, Kidd stony loam, Los Robles gravelly clay loam, Pleasanton-Haire complex, Toomes rocky loam, and 19.4% comprised of other more minor constituents.

Comparison with Petaluma Valley. Exact percentages of soil distribution were not calculated for areas outside of Sonoma Valley. However, visual inspection of the Sonoma County Soil Survey maps (reproduced and color coded for convenience as **Exhibit 3**) allows certain obvious conclusions to be drawn about the significant differences between Bennett Valley and the Cotati area of

Petaluma Valley ("Cotati valley"), at the base of the mountain on the ocean-facing side.

- 1. The mountainside and foothills of the Sonoma Mountains on the Petaluma Valley side have a much higher percentage of Goulding-Toomes complex than the Sonoma Valley side. There are also significant-sized areas of Diablo clay and Sobrante loam visible on the map.
- 2. The dominant soil types on the Cotati valley floor at the western base of Sonoma Mountain are Clear Lake clay and Clear Lake clay loam. Clear Lake soils consist of geologically young clays that formed under poorly drained conditions. These soils are underlain by recent alluvium from basic and sedimentary rock. They occur on plains and flat basin areas with slopes of 0 to 5%, at elevations ranging from 20 to 300 feet.

The proposed Bennett Valley viticultural area contains less than 1% Clear Lake clay and Clear Lake clay loam. Sonoma Mountain AVA also has less than 1% Clear Lake clays. The Los Guillicos area, as defined above, has less than 5% Clear Lake clay loam and no occurrence of Clear Lake clay.

3. Soil variability in Cotati valley is much less than in Bennett Valley and or its surrounding mountains. Moreover, the minor soils found there differ from soils in Bennett Valley and the surrounding parts of Sonoma Valley. The minor soils present in Cotati valley include Alluvial land (sandy), Haire gravelly loam, Huichica loam, Pleasanton clay loam, Raynor clay, Wright loam, and Zamora silty clay loam.

Conclusion. The soils of the proposed Bennett Valley viticultural area differ from the soils of surrounding areas in several ways, as follows:

First, the predominant soil type in the proposed viticultural area and vicinity is Goulding-Toomes-Guenoc Association. The percentage composition of this soil association in Bennett Valley differs from the proportions normally found in other parts of Sonoma County. In Bennett Valley, the Goulding-Toomes-Guenoc Association contains significantly less Toomes and Guenoc soils, significantly more Spreckels loam soil, and significantly less of the other minor soil types normally occurring with this association. In addition, the composition of the Goulding-Toomes-Guenoc Association in Bennett Valley is different than its composition in adjacent areas, as shown in **Table 3**.

Second, the soils of the proposed appellation also vary in other ways from nearby locations in Sonoma Valley. Differences in the distribution of Spreckels loam, Laniger loam, Haire loams, and Red Hill clay loam, and differences in soil diversity

distinguish the proposed Bennett Valley viticultural area from the adjacent parts of Sonoma Valley.

Third, the soils of the proposed appellation are different from soils on the Petaluma Valley side of Sonoma Mountain, and from the Cotati valley lying at the base of the mountain. The Goulding-Toomes-Guenoc Association found on the ocean-facing slopes of Sonoma Mountain is similar in composition to the rest of the county, while the same soil association found on the inland side of the mountain is not. Finally, while Spreckels loam is prevalent on the inland side of Sonoma Mountain, there is very little of this soil type on the Petaluma side.

The soils found on the Cotati valley floor are much less diverse than in Bennett Valley, and they are dominated by Clear Lake clay and Clear Lake clay loam, a soil type which is very minor in its occurrence in Bennett Valley.

Distinguishing climate

Bennett Valley in the context of Sonoma County's climate. Like the nearby Santa Rosa Valley into which Bennett Valley opens, the climate of the proposed Bennett Valley viticultural area is warmer than Russian River Valley and Petaluma Valley, and cooler than much of the rest of Sonoma Valley, including the portion of Sonoma Mountain AVA lying outside the Matanzas Creek watershed and outside Bennett Valley AVA's proposed boundaries. Contemporary experience with viticulture in Bennett Valley indicates that the area is optimal for Merlot. Although Cabernet Sauvignon can ripen there on warmer sites, most Cabernet vineyards in the North Coast have a warmer climate. See Exhibit 5.A., Bennett Valley climate vs. Cabernet vineyards elsewhere.

A newspaper article published in Santa Rosa's daily newspaper "Press Democrat" on June 5, 1994 corroborated the regional climate variations described above, and explained the mechanisms which create Sonoma County's climatic diversity. In the article, Santa Rosa Junior College meteorology professor Ron Smith described the conclusions of his twenty years experience studying the local weather:

"To understand the weather pattern, Smith said to visualize air as water, flowing into Sonoma County from the ocean, through mountain gaps and canyons. Summer temperatures are determined by the thickness of the fog.

"A thick fog will spill over the coastal mountains, burning off by midmorning and keeping temperatures moderate everywhere.

"A thin layer of fog will be blocked by the coastal range, but it slips in through Tomales Bay at the 'Petaluma Gap,' over Bloomfield to Petaluma. The fog bank splits at Petaluma. One part curls south around Sonoma Mountain to Sonoma and Glen Ellen and the other part goes north to Santa Rosa and Healdsburg, curling down the Valley of the Moon [Sonoma Valley] toward Kenwood.

"The fog seldom reaches Cloverdale, which is Sonoma County's hot spot. Glen Ellen and Kenwood are also warmer because they often aren't reached by fog coming down from Santa Rosa and up from Sonoma.

"'It's coolest near the ocean. The next coolest is the Santa Rosa valley, the Sonoma Valley is a little warmer and the next valley — Napa, St. Helena, and Calistoga — is hotter still...' Smith said."

In coastal areas such as Sonoma County, the microclimate in locations protected by hills and mountains is significantly warmer than other locations, even on days with thick fog, for two reasons: (1) The coldest ocean air (the lower layers that were in direct contact with the water) are excluded by the topographic barrier. (2) Marine air from a deep intrusion that spills over the top of the barrier is warmed as it descends by a phenomenon called "adiabatic heating" (a natural rise in temperature that accompanies the compression of a sinking body of air).

The excluded portion of Sonoma Mountain AVA lies on the most protected part of the mountain. The mountain's great height and mass shelters the vineyards on its northeast-facing slopes from direct coastal fog and wind intrusions. This face of the mountain has a warm climate for the same reason that the town of Glen Ellen, at the inland base of Sonoma Mountain, is one of the warmest spots in Sonoma County. (See **Exhibit 5.B.**, a map of highest observed temperature, documenting that Glen Ellen and Cloverdale are the warmest areas in Sonoma County.)

In contrast, the northwest-facing Sonoma Mountain vineyards, which have been included in the proposed area, have a cooler climate because of their location overlooking Grange Road. Grange Road runs through Crane Canyon, the low pass in the Sonoma Mountains which was described above in the section on distinguishing topography. This pass acts allows the strong coastal influence which enters Sonoma County at the Petaluma Gap to penetrate into Bennett Valley.

Harold Gilliam emphasized the importance of wind gaps and passes in his authoritative University of California Press handbook *Weather of the San Francisco Bay Region*.

"The Golden Gate is the largest and lowest of the gaps in the Coast Range and has the greatest influence on Bay Region weather, but the other gaps function as 'little Golden Gates,' funneling ocean weather inland along streamlines....

Immediately north of the Golden Gate there is a narrow gap at Elk Valley, a higher gap above Muir Woods (both of which affect the climate of Mill Valley), and the considerably more important Estero Gap [more commonly known locally as the Petaluma Gap], which funnels

winds and fogs from the Bodega Bay area into the Petaluma Valley. The cooling influence of this gap can be clearly felt if you drive north on a summer afternoon along Highway 101. When you round 1600 foot Burdell Mountain and enter the Petaluma Valley, the temperature suddenly drops several degrees and you feel the influence of the sea breeze. The Estero Gap (named for the estuaries at its seaward end) extends its cooling effect as far as Santa Rosa and beyond."

See Exhibit 4.A., a illustration from Gilliam's book showing the location of the major gaps in the Bay Area.

Marine influence in Bennett Valley. There are three sources from which incoming marine air enters Bennett Valley: the wide mouth of the valley opening to the Santa Rosa valley at the northwest, the wind gap entering the valley via Grange Road, and the head of the valley, where the valley narrows and rises as Bennett Valley Road passes over Bennett Ridge. Cool coastal air and fog from the Petaluma Valley and the Russian River flows into Bennett Valley over the broad plain in which the city of Santa Rosa sits. Coastal weather also intrudes via Grange Road, as mentioned above. Finally, on relatively rare occasions, marine influence which entered southern Sonoma Valley around the southern base of Sonoma Mountain and directly off the San Pablo Bay may bring cooling breezes and fog into Bennett Valley from the south.

Longtime residents of Bennett Valley report that, of the three sources, Grange Road accounts for the strongest and most frequent intrusion of coastal influence into Bennett Valley. This is easy to explain: the Crane Canyon gap has direct access to the Petaluma Valley and runs in approximately the same direction as the prevailing northwesterly summer winds. Marine influences entering Bennett Valley either at its mouth or at its head have a longer and less direct route to travel before reaching the valley.

The opening to the Santa Rosa valley is the second largest source of ocean air entering Bennett Valley. It is less significant than the opening at Grange Road, because cool air arriving across the Santa Rosa valley has had to travel farther to reach Bennett Valley, so morning coastal fog often dissipates before reaching the valley's mouth.

The narrow opening at the head of Bennett Valley is the least important source of marine influence. As stated above, only rarely does fog intruding into southern Sonoma Valley reach Glen Ellen, let alone flow past Glen Ellen into Bennett Valley. Even when it does, its cooling capacity is greatly diminished. The ocean and bay influence travels a significant distance through warm climate zones as it makes its way northward, gradually drying out and heating

up through contact with the earth. If a portion of it finally reaches Bennett Valley's narrow head, it warms further by the process of adiabatic heating described above as it descends from the high point at Bennett Ridge into the valley below.

Sonoma County climate zones. The University of California Agricultural Extension Office has identified three general climate zones in Sonoma County, based on research begun by Robert Sisson during his tenure (1950-1985) and continued by his successor Paul Vossen.

These climate zones — coastal warm, coastal cool, and cold — are shown in **Exhibits 5.C.** and **5.D.** The irregular shapes and specific locations of these zones result from the interaction between coastal air and topography.

Paul Vossen, the former horticulture and viticulture advisor for the University of California Cooperative Extension in Sonoma County, was interviewed about the county's climate for an article that appeared in the "Press Democrat" on March 20, 1986. He was quoted as follows:

"The major climatic influence on any one site in Sonoma County is determined by the marine air flow and the effects of the geography in directing or diverting the air flow. During an average summer, there are many days when fog maintains a bank of cold air all along the coastline and cold breezes blow a fog bank in through the Petaluma gap; hitting Sonoma Mountain, it moves northward toward Santa Rosa, northwestward toward Sebastopol, and eventually to Healdsburg and Cloverdale.

"It also moves around Sonoma Mountain¹, not quite reaching Glen Ellen. The time of day when this occurs and the duration of the fog designates three distinct major climatic zones."

Examination of the climate maps in **Exhibit 5** corroborates the fact that Bennett Valley's climate is cooler than the climate on the Glen Ellen side of Sonoma Mountain, and warmer than the Petaluma Valley. The Press Democrat article also confirms this:

¹ Coastal air moves around Sonoma Mountain through the gap at Grange Road leading into Bennett Valley on the north side of the mountain, and through a gap at Stage Gulch Road leading into the Carneros region of Sonoma Valley on the south side of the mountain. See **Exhibit 4.B.**, a road map showing these two gaps.

"Sebastopol, Santa Rosa, Forestville, Sonoma, and Windsor are in this [coastal cool] climate zone, Vossen says.

"Coastal warm gardeners are in Healdsburg, Alexander Valley, Cloverdale, Glen Ellen, and Eldridge, where they are 'mostly protected from the early fog bank by elevation, mountain ranges, or distance (time)....(they) have the strongest climate support in the county.""

Conclusion. The microclimate of the proposed Bennett Valley viticultural area is distinct from the microclimates of surrounding areas. Bennett Valley is warmer than the Russian River Valley, which lies much closer to the ocean than the proposed appellation; and it is cooler than other parts of Sonoma Valley, including the excluded portion of Sonoma Mountain AVA lying outside the Matanzas Creek watershed.

The climate in Bennett Valley is considered to be ideal for Merlot, while it is cooler than most vineyard areas where Cabernet Sauvignon predominates. The proposed appellation's temperatures are moderated by marine influences which enter it predominantly through the wind gap at Grange Road, secondarily through the mouth of the valley at Santa Rosa, and occasionally through the head of the valley. Because of these cooling influences, Bennett Valley falls within the "coastal cool" climate zone of Sonoma County.

Historical and name evidence

Historical use of the area

Bennett Valley settlement. In the early 1800s, two competing groups of different nationalities were settling in Sonoma County: Russian explorers based at Fort Ross on the coast and Spanish settlers moving north from San Francisco. Around 1834 General Mariano Vallejo was sent to take control of the territory above San Francisco and block further expansion by the Russians. Generous land grants made by Vallejo in this connection greatly expedited the settlement of Sonoma County in the areas of Santa Rosa, Healdsburg, and Kenwood. One of these grants, a portion of Santa Rosa township encompassing a relatively small area southeast of the city of Santa Rosa, was known as "Yulupa." The boundaries of the Yulupa land grant coincide very closely with, and entirely contain, the area now known as Bennett Valley (see Exhibits 6.A. and 6.B.).

Bennett Mountain and Bennett Valley were named in honor of one of the earliest immigrants to settle there — a man from Missouri named James N. Bennett. Traveling west by a wagon train, James Bennett first arrived in the valley in 1849. He paused there to nurse his ailing daughter, who subsequently died of typhoid fever and was buried at the foot of the mountain that now bears his name (it was called "Yulupa Peak" at the time). Bennett decided to settle in the valley permanently, became a prosperous citizen, and in 1854, as a State Assemblyman, introduced the bill that made Santa Rosa the county seat.

Within a decade of Vallejo's arrival, people began settling Sonoma County in large numbers due to the 1846 Bear Flag Revolt and the 1849 Gold Rush. In the early 1850's, Bennett Valley became the home of an influx of settlers who quickly took to farming, and by 1884 Bennett Valley had become a highly productive agricultural region. An October 29, 1949 article in the Press Democrat titled "Picturesque Bennett Valley Scene of Farm Prosperity," described this period in Bennett Valley's early history:

"Bennett Valley's rich soil on the valley floor proper and on the lower rolling slopes of the hills drew settlers speedily. Men and women who came in search of gold in the mines found agricultural gold in the sunshine drenched valley."

The population of 300 in Bennett Valley raised grapes, apples, hay, wheat, oats, barley, and engaged in all types of animal husbandry. Other activities in the valley at that time included coal mining and a hot springs resort on Taylor Mountain. Settler John Shakleford Taylor came to Bennett Valley in 1853 and purchased 2,000 acres on the mountain that now bears his name. Taylor, the

largest landholder in the county, owned some of the richest and most productive valley lands in Santa Rosa. But he is best remembered for his "White Sulphur Springs" resort (later re-named "The Kawana Springs Resort"). Taylor sent carriages into town several times a day to meet the tourists arriving from San Francisco and bring the weary travelers back to his large hotel to recuperate from their journey and relax in the natural springs.

Bennett Valley's population grew slowly and steadily. In 1851 Bennett Valley formed its first school district (called the Santa Rosa School District) and built a small schoolhouse "near the bridge at Matanzas Creek" according to the 1949 Press Democrat article quoted earlier. About four years later, a second school district was organized "at the other end of the valley." The schoolhouse serving the Strawberry School District was located on the westernmost stretch of Sonoma Mountain Road, a short distance south of its intersection with Bennett Valley Road. (See school locations marked in **Exhibit 7**.) In 1873 the Bennett Valley Grange was built as a focal point for community agricultural activities; this historic hall, the oldest active grange in America, still stands on Grange Road.

Bennett Valley today has probably the strongest community identity of any area of Sonoma County. In 1977 the Sonoma County Board of Supervisors established "The Bennett Valley Study District" at the request of residents who were concerned about preserving the valley's rural character against the threatened encroachment of commercial development. An eleven-member Citizens Committee was appointed in 1978 to work with county planning and the citizens of Bennett Valley in developing the "Bennett Valley Area Plan," a supplement to the County General Plan. For several decades following the adoption of that plan, a strict local design review process unique to Bennett Valley oversaw all building activities in the area, approving the locations of new homes and passing judgment on even the choice of construction materials and paint colors. As a result of the united efforts and dedication of the people of Bennett Valley, the pristine scenic quality of the environment in Bennett Valley appears virtually unchanged in spite of its proximity to the growing city of Santa Rosa and the slow but steady addition of new homes in the area since the Area Plan took effect.

Viticultural history. Bennett Valley has a rich viticultural history. Settlers to the area began planting vineyards and making wine in the mid-1800s.

Isaac DeTurk, whom prominent Santa Rosa historian and columnist Gaye Le Baron called "THE pioneer vineyardist and winemaker in the Santa Rosa Valley," started his winemaking career at the base of Bennett Mountain with his famed "Yulupa Vineyard." He planted thirty acres of vines in 1862, later increasing his vineyard to fifty acres. The vineyard was about equally divided between Mission

and Zinfandel grapes. After selling his first crop to a Santa Rosa neighbor, he crushed his second vintage of 15,000 gallons at his Belle Mount Winery (named in honor of Bennett Mountain) in 1867. The winery was located on the northeast side of the intersection of Bennett Valley Road and Grange Road, in the heart of Bennett Valley.

One of the most ambitious and prominent vintners in Sonoma County, DeTurk was soon buying grapes from neighboring vineyards, and in 1878 he expanded his winemaking capacity in Bennett Valley to 100,000 gallons. He also built a larger winery in the city of Santa Rosa and a third winery in Cloverdale. He finally sold his small Bennett Valley vineyard to George Davis in 1885 in order to acquire twelve hundred acres east of Kenwood in Los Guillicos valley, where he established what was at the time one of Sonoma Valley's largest vineyards. At the height of his success, his Santa Rosa winery was one of the largest in the state, with a storage capacity of a million gallons of wine. He produced award winning clarets, sherry, port, and Riesling, and shipped his wines to Chicago, St. Louis, and New York.

The name of Bennett Valley frequently appears in historical sources in connection with 19th century grape growers and wine makers. **Table 4** lists the names of twenty-four growers who have been specifically linked with Bennett Valley in historic accounts; the locations of these growers are indicated on the historic maps reproduced as **Exhibits 7.A.** and **7.B.**

It is evident from reviewing growers lists in the viticultural directories of the day that many other Bennett Valley property owners shown on the historic atlas maps were also grape growers; however, their names are not included in **Table 4** because their listings in the directories made no specific reference to Bennett Valley. However, even though **Table 4** is only a partial listing of grape acreage and winemaking capacity in 19th century Bennett Valley, it is readily apparent that there were more vineyards and wineries in the area at that time than currently.

David Steiner, one of the first to replant winegrapes in Bennett Valley in modern times, was aware of the area's significant viticultural heritage. He was quoted in an article entitled, "Move Over Napa, Here Comes Bennett Valley" by Ray Smith, published in the "Press Democrat" on October 11, 1978, as follows:

"'Oldtimers say there once were 2,000 acres planted to vines out here,' says one of the growers, David Steiner, 'and I think we are just getting started again as a grape growing region.' Unfortunately, by the turn of the century many of Bennett Valley's vineyards were destroyed by phylloxera. The rest of the winegrape industry in the valley was killed a few decades later by the enactment of Prohibition, and almost all the vineyard land in Bennett Valley was converted to other agricultural purposes.

Viticulture began to return to Bennett Valley in the 1970s. Ray Smith reported on its progress in the same article:

"...not far east of the golf course the valley between Bennett Mountain and ridge on the north and the Sonoma Mountains on the south opens up to grazing land, some truck farmers, and varietal grapes planted mostly on oak-studded slopes of the mountains and rolling hills...."

"Of the 1,700 residents there are about 20 grape growers, most of them small to medium landowners who have come into the valley in the past 10 years and planted to the point where there are now between 500 and 600 acres in vines.

"That may seem like only peanuts compared with the thousands of acres planted to grapes elsewhere in Sonoma County, but Bennett Valley growers see a potential of 1,200 to 1,500 acres of grapes."²

David Steiner was also one of the founders, along with Sandra MacIver, of Matanzas Creek Winery, the first winery to be established in Bennett Valley in the 20th century. Writes Mary Tanner in her article "Bennett Valley: Taking Control of its Destiny," which appeared in "Wine Country" magazine's June 1981 issue:

"Sonoma County's Bennett Valley is a blossoming viticultural and wine producing area producing excellent wines and highly coveted grapes that will encourage growers of grapes, not houses, to cultivate the land."

² It should be noted that the number of Bennett Valley growers and acreage cited in Smith's article includes vineyards on Enterprise Road, which are not part of the area being petitioned as Bennett Valley viticultural area. Smith examined grape growing in the entire Bennett Valley Study Area as defined by the Sonoma County Planning Department in the Bennett Valley Area Plan adopted earlier that year: "... an area roughly from Petaluma Hill Road on the west, Crane Canyon Road on the south; Enterprise Road on the east, and Bennett Mountain and ridge on the north." The evidence for excluding part of the Bennett Valley Study Area from the currently petitioned boundaries is presented in the next section, "Evidence indicating that the name conforms to the petitioned boundaries."

"Sandra MacIver, [then] owner of Matanzas Creek Winery, and David Steiner, of Steiner Vineyards, settled in Bennett Valley about ten years ago [in 1971] 'That's when we bought the ranch on Sonoma Mountain Road." ... In 1975 Steiner and MacIver bought another ranch on the Bennett Valley floor and planted 20 acres of Chardonnay and Merlot.... It was here that they converted an old dairy barn to a winery. Matanzas Creek's first crush was in 1978."

Grape acreage returned to Bennett Valley at a slow pace at first, but new vineyards continue to be planted. Currently, there are approximately 650 acres of winegrapes in the proposed appellation. These include Merlot (42% of the planted acreage), Chardonnay (30%), Pinot Noir (8%), Syrah (7%) and a lesser amounts of other varietals including Cabernet Sauvignon, Cabernet Franc, Barbera, Cinsault, Dolcetto, Freisa, Grenache, Nebbiolo, Viognier, and Zinfandel.

TABLE 4: Historical growers linked to Bennett Valley, keyed to locations on historical atlas maps (Exhibit 7)

the 1900-toot Bennett Mountain.			
Ranch, six miles southeast of Santa Rosa, above Bennett Valley Road and at the base of	p. 112		
"The largest of all the Bennett Valley wineries was that of Isaac DeTurk at his Yulupa	Peninou ⁵ ,		1
at the foot of Bennett Peak"			
the future of the Santa Rosa Valley. In 1862 he established his Belle Mount Vineyards			
Indiana He may have been the first to appreciate the importance of grape culture to	p. 62		
" in 1858 Isaac DeTurk, son of a viticulturalist, came to Sonoma County from	LeBaron ⁴ ,		1
brandy."			
cellars and was producing 250,000 gallons of wine a year, as well as 10,000 of			
Creek, consisted of twenty acres in 1862. Twenty years later De Turk owned three			
Vineyard, six miles southeast of Santa Rosa between Bennett Peak and Matangas			
began an illustrious career by making three pipes [sic] of wine. De Turk's Yulupa	Morrow ³		***************************************
"A native of Pennsylvania named Isaac De Turk settled at Santa Rosa in 1862 and	McKee	Isaac DeTurk	4
the picture a quarter of a century later."			,
"About 1860 W.B. Atterbury laid out a vineyard near Taylor Springs which was still in	McKee	W.B. Atterbury	ω
northern and western exposure.			
Location given: Glen Ellen. 23 acres in winegrapes; soil light gravelly; valley and hill;	DeTurk ²		
prospered in 1888."			
vines by 1867, and was turning out 30,000 gallons by 1876; his vineyard still			
"At the eastern end of Bennett Valley, near Glen Ellen, Alfred V. La Mott had 25,000	McKee	Alfred V La Mott	2
the eastern end of Bennett Valley in 1854."			*********
"A man named Holman was reported to have planted one thousand Mission vines at	McKee ¹	Holman	
Reference linking grower to Bennett Valley	Source	Grower	Ref#

^{1 &}quot;Historic Sonoma County Winegrowers," Irving McKee, PhD., appearing in CALIFORNIA—Magazine of the Pacific, September 1955

² The Vineyards in Sonoma County; Being the Report of I. DeTurk, Commissioner for the Sonoma District to the Board of State Viticultural Commissioners of

³ "Directory of Almond R. Morrow," General Manager in charge of wine production for the California Wine Association, reprinted in Peninou (cited below), p. 401

⁴ Santa Rosa: A Nineteenth Century Town, Gaye LeBaron, 1985

⁵ History of the Sonoma Viticultural District, Comprising Sonoma, Marin, Lake, Mendocino, Humboldt, Trinity, Del Norte and Siskiyou Counties: The Grape Growers, the Wine Makers, and the Vineyards, Ernest P. Peninou, 1998

	t 	9					%			1 1 1 1 1 1					7		6		5	Ref#
		Alexander H. Sutherland				Schieck	John Gottfried			† 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2					William Thompson	erson ersons dann men vid kennden en statutskallen statutskallen en statutskallen statutskallen skallen kalen	Coleman Talbot		Nelson Carr	Grower
DeTurk		Peninou, p. 110	DeTurk	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		p. 110	Peninou,		5	DeTurk				p. 109	Peninou,	p. 156	LeBaron,	p. 128	LeBaron,	Source
Location given: Santa Rosa. 30 acres, soil sandy loam; upland and rolling; exposure generally south.	clearing part of this beautiful site, he could boast a fifty acre vineyard, chiefly Zinfandels. He had no winery, but hauled his grapes to Glen Ellen or Sonoma."	"One mile to the west of 'Redwood' Thompson on Sonoma Mountain Road was a quarter section of land acquired by Alexander H. Sutherland in 1854. By 1877, after	Location given: Glen Ellen; "situated at northern base of Sonoma Mountain." 20 acres in winegrapes; soil adobe; mountain; northern exposure.	inherited by his sons, David and Hermann, who maintained both vineyard and winery through 1910."	at the northern base of the mountain and planted a new vineyard. This land was	chiefly Rieslings, on the lower slopes of Sonoma Mountain. In 1892, when phylloxera had almost completely destroyed this vineyard, Schieck began clearing land higher up	"[Schieck] moved to Sonoma County and planted some fifteen acres of grapevines,	gallons.	north and east exposure; oak cooperage 15,000 gallons; redwood cooperage 10,000	Location given: Glen Ellen. 8 acres of winegrapes; soil black gravelly loam; upland;	slops below his residence, he built a wooden winery."	acre vineyard and a fine two-story house. In the early 1890s, on the cool, wooded	"Redwood" Thompson to this region in 1852 By the early 1860s he had a fifteen	springs Road and begins climbing up a wooded callyon to all upland flat overlooking	"A little over one mile from Glen Ellen, Sonoma Mountain Road forks left from Warm		"Coleman Talbot, an early settler in Bennett Valley"	purchase of land [for Santa Rosa's first library building]"	"A gift of \$1,000 from Bennett Valley pioneer Nelson Carr was earmarked for the	Reference linking grower to Bennett Valley

winegrapes; soil clay adobe; upland; exposure all directions; oak cooperage 50,000		150, 140	
Location given: Santa Rosa; "Best grapes and best wine on north slope. This vineyard is properly cultivated and cared for and is one of the best in Bennett Valley." 140 acres in	DeTurk		
sons."	1 1 1 1 1 1 1 1 1 1 1 1		; ; ; ; ; ;
operated as the Lenoir Wine Company; following Repeal the vineyard, considerably			
bulk to destinations as far as Chicago. For some years before Prohibition the plant was			
acres in vines and his own winery by the late 1880s; he shipped most of his wine in			
Irishman. Starting with plantings of Zinfandels and Grey Rieslings, Phillips had 130	Morrow	· · · · · · · · · · · · · · · · · · ·	
with Bennett Valley Road was a vineyard begun in 1870 by Walter Phillips, an	p. 111		
"Two miles down and one mile above the intersection [of Sonoma Mountain Road]	Peninou,	Walter Phillips	12
north; oak cooperage 23,000 gallons; redwood cooperage 12,000 gallons			
Mountain." 50 acres in winegrapes; soil light sandy loam; upland; exposure east and			
Location given: Santa Rosa; "This vineyard is well up on the south slope of Taylor	DeTurk		
his death in 1911."	1	; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	1 1 1 1 1 1 1 1 1 1
Zinfandels. He constructed a winery in the early 1880s and kept it in operation until			
soon began to plan a vineyard and eventually had fifty acres in grapes, mostly			
permanently in Bennett Valley above Crane Canyon Road [Grange Road] Whitaker	Morrow		
acquired 160 acres — later increased to four hundred acres — and settled	<u>,</u>	Whitaker	
"George Napoleon Whitaker had come to California from Iowa in 1853 In 1866, he	Peninou,	George Napoleon	<u></u>
exposure north; oak cooperage 5,000 gallons; redwood cooperage 70,000 gallons			
Valley." 30 acres in winegrapes; soil loam, part gravelly and part clay; upland;			
Location given: Santa Rosa; "This vineyard on hills or mountains west of Bennett	DeTurk		
own grapes plus grapes from neighboring vineyards."	5	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	! ! ! ! !
of Zinfandels, and by 1885 they had built a winery and were making wine from their			
one of the earliest in the area In the early 1860s they set out about twenty-five acres			
Road, was the ranch that Albert Burnham and his family developed beginning in 1862,	p. 110		
"One mile further west on Sonoma Mountain Road, at the intersection with Pressley	Peninou,	Albert Burnham	10
Reference linking grower to Bennett Valley	Source	Grower	Ref #

Ref #	Grower	Source	Reference linking grower to Bennett Valley
13	Henry Kirch	Peninou,	"One of Phillips' neighbors on Bennett Valley Road was Henry Kirch, a Bavarian who
		p. 111	had property above the intersection with Sonoma Mountain Road In 1844 he became an orchardist and winegrower with fifty acres in vines."
		DeTurk	Location given: Santa Rosa. 40 acres in winegrapes; soil black; upland; exposure all
14	lohn Strong	Peninou	"I ower down Bennett Valley Road, northeast of the intersection of the present Ronne
	· ·	p. 112	Drive, was property purchased by John Strong in 1875 Of his 450 acres, he planted
			50 to grapes. He maintained the vineyard with the help of his sons until his death in
		7.T.	1910"
		2	exposure all directions.
15	A. Moloney	Peninou,	"A. Moloney had about twenty-five hillside acres in vines southwest of Strong; the land
		p. 112	is now subdivided and traversed by Valley View Drive."
16	John Dixon	Peninou,	"Across from Moloney on the north side of Bennett Valley Road was property settled
		p. 112	by John Dixon
:		Morrow	
		DeTurk	Location given: Santa Rosa. 52 acres in winegrapes; soil light colored loam; upland
			principally; exposure all directions; oak cooperage 28,000 gallons.
17	George W. Davis	Peninou,	"In 1885 [Isaac DeTurk] sold the 140-acre Yulupa Ranch to George W. Davis"
; ; ; ; ; ;	r r r r r r r r r r r r r r r r r r r	p. 114	
		DeTurk	Location given: Santa Rosa [this is Isaac DeTurk's original vineyard]. 50 acres in
			winegrapes; soil red foothill; foothill and rolling; exposure southwest, sheltered from
			winds; oak cooperage 18,000 gallons; redwood cooperage 92,000 gallons.
18	S.C. Story	Morrow	listed under "Bennett Valley"
19	H. von Keppel	Morrow	listed under "Bennett Valley"
20	Nelson Carr	DeTurk	Location given: Santa Rosa. 37 acres in winegrapes; soil, 17 acres of light gravelly loam
			and 20 acres firmer and closer; upland; exposure south.
		Thompson ⁶	"Also [shown is in the engraving on page 77 is] the beautiful home of Nelson Carr, ,
			who lives at the head of [Bennett] valley.

⁶ Historical Atlas Map of Sonoma County, California, Thomas Thompson & Co., 1877

Ref # 21	Grower E. W. Davis	Source DeTurk	Reference linking grower to Bennett Valley Location given: Yulupa via Santa Rosa. 80 acres of winegrapes; soil foothill and alluvial; upland; full exposure to sun, protected from north wind; oak cooperage 18,000 gallons; redwood cooperage 132,000 gallons. "The vineyards in this part of Bennett Valley are just beginning to show signs of phylloxera, and owners are uprooting as fast as the disease appears, and are planting trees." Location given: Yulupa. 8 acres of winegrapes: soil white grayelly loam: upland:
L. H. Hedrick		DeTurk	Location given: Yulupa. 8 acres of winegrapes; soil white gravelly loam; upland; exposure, west slope at the base of Bennett Peak.
Edwin Peterson	terson	DeTurk	Location given: Yulupa. 8 acres of winegrapes; soil black loam; upland; exposure, west slope, Bennett Peak on east.
James Adam	dam	Thompson	"The fine farm of James Adam, in Santa Rosa Township, lies just at the mouth of Rennett valley of which an engraving appears on page 77."

Evidence indicating that the name conforms to the petitioned boundaries

There are numerous references to Bennett Valley in historic and current literature which include descriptions of the location and boundaries of the area. Almost all of these descriptions conform closely to the boundaries being proposed for the new appellation.

Historic references. Thompson's Historical Atlas Map of Sonoma County, published in 1877, is primarily a book of maps (three pages of which are reproduced as Exhibit 7.A.). However, it also includes a brief narrative "History of Sonoma County, California," which describes Bennett Valley in significant detail as follows:

"Bennett valley, another of the small valleys of Sonoma, worthy of mention, lies south of the town of Santa Rosa, and east of the Santa Rosa valley. It has a length of eight miles, and an average width of four miles. It possesses all the features peculiar to other parts of the county we have described. If it has any specialty, it is for of fruit and grape culture. The fine farm of James Adam, in Santa Rosa Township, lies just at the mouth of Bennett valley, of which an engraving appears on page 77; and also the beautiful home of Nelson Carr, (on same page), who lives at the head of the valley. Near the centre is the celebrated vineyard of Isaac DeTurk, where he has lived for many years, and been extensively engaged in the manufacture of wine."³

The size of Bennett Valley, as described in the above account, is quite small. The reader can verify this by locating the three ranches mentioned on the maps of **Exhibit 7.**⁴ James Adam's ranch was located in the portion of Bennett Valley which is within the current city limits of Santa Rosa. Isaac DeTurk's ranch, of course, was located at the base of Bennett Mountain, north of Bennett Valley Road, across from the intersection with Grange Road. Nelson Carr's ranch was also on the north side of Bennett Valley Road, just across from its western intersection with Sonoma Mountain Road.

³ The engravings from page 77 of the atlas, referred to in this excerpt, appear in this petition as **Exhibit 8**.

⁴ In the Reynolds and Proctor *Illustrated Atlas of Sonoma County, California*, James Adam's ranch is shown as the property of the then current landowner, John Dixon.

This understanding of Bennett Valley's size and location was evidently widely accepted. It is quoted nearly verbatim by historian J. P. Munro-Fraser in his History of Sonoma County, including its geology, topography, mountains, valleys and streams; with a full and particular record of the Spanish grants; its early history and settlement, which was originally published in San Francisco in 1880 by Alley, Bowen & Co.:

"Bennett Valley.—Here we have another of the small valleys of Sonoma. It lies south of the town of Santa Rosa, and east of the Santa Rosa valley, has a length of eight miles, and an average width of four miles, while it possesses all the features peculiar to other parts of the county, its soil and climate being peculiarly adapted for the cultivation of fruit and grapes."

Yulupa land grant. The Yulupa land grant previously mentioned in the history section was closely linked with Bennett Valley. "Yulupa" was the Indian name for Bennett Mountain, and it was also the name given to a creek originating on the mountain's eastern slopes (the creek is still known by that name). Exhibit 6 illustrates the very close correspondence between the boundaries of the Yulupa land grant and the proposed viticultural area. The Yulupa land grant was contained entirely within Santa Rosa township — a fact whose significance will become apparent later in this section — and Bennett Valley is located entirely within the Yulupa land grant.

19th century school districts. The division of Bennett Valley into school districts in the mid-1800s supports the view that the valley is limited to the Matanzas Creek watershed. Bennett Valley histories recount the establishment of two school districts, said to be at either end of the valley. As described earlier in the history section, the school for the Santa Rosa school district was located close to the mouth of the valley, while the school for the Strawberry school district was located just east of Grange Road, on Sonoma Mountain Road.

A third school district can be found on the historic atlas maps; its schoolhouse was located south of Bennett Valley Road and just outside of the Santa Rosa township boundary line, near the current location of Enterprise Road. This school district, known as the Enterprise school district, was not associated with Bennett Valley in historic accounts. (See **Exhibit 6.C.**, showing schoolhouse locations.)

Modern references to Bennett Valley. Most recent descriptions of Bennett Valley generally conform to the area covered by this petition.

Mary Tanner included the following description in her article "Bennett Valley: Taking Control of its Destiny" (cited above). She made a point of distinguishing

between the geographic reality and the political conception of Bennett Valley, and described both definitions.

"Bennett Valley trends southeast from Santa Rosa between Mt. Taylor and Sonoma Mountain on the west and Bennett Ridge and Bennett Mountain on the east. Politically, Bennett Valley is the valley floor and the Sonoma Mountain Road area extending as far east as Enterprise Road."

In the modern tourist handbook, *Making the Most of Sonoma County, A California Guide*, by Don Edwards, Bennett Valley's description exactly matches the proposed boundaries for the new appellation.

"Bennett Valley — squeezed between Taylor Mountain and the Sonoma Mountains on the west, Bennett Peak (Yulupa to the Indians) and Bennett Ridge to the east — has been ranching and farming country since the days when Missourian William Bennett settled here."

The history page on the Bennett Valley Homeowner's Association web site contains a description of Bennett Valley that also matches the proposed boundaries.

"Bennett valley is nestled between three mountainous peaks; Taylor Mountain to the west, Sonoma Mountain to the south, and what are known today as Bennett Peak and Bennett Ridge to the east."

Governmental references. Even the Bennett Valley Area Plan drafted by the Sonoma County Planning Department, which governs a larger area than this petition contemplates, describes the *geographic*, not *political*, Bennett Valley in its introductory text.

"Description of Bennett Valley. Bennett Valley is located just southeast of the city of Santa Rosa in the County of Sonoma, known as the North Bay Region. (Map 1) [attached to this petition as Exhibit 9.B.]

Between the mountain backdrops and the valley floors lie rolling upland hills: Taylor Mountain, Bennett Mountain and the Sonoma Mountains ring the triangular shaped valley, which is drained by Matanzas Creek, a tributary of Santa Rosa Creek. (Map 2) [attached to this petition as Exhibit 9.C.]"

It can legitimately be speculated that the political boundaries of the study area were drawn purposely larger than the area's natural geographic boundaries in order to provide a buffer to keep the burgeoning growth of Rohnert Park, located on the Petaluma side of Sonoma Mountain, far from the rural community in Bennett Valley.

There is additional evidence within the document that the county planners recognized the difference between the geographical and political definitions of the valley: The Design Review Committee's Development Guidelines, reproduced on pages 19 through 22 of the Bennett Valley Area Plan, consistently refer to the committee as "the Bennett Valley/North Sonoma Mountain Design Review Committee." Reference is also made to "Bennett Valley/North Sonoma Mountain area residents." This terminology implies the planners' recognition that the politically defined area included both the Bennett Valley community and the socially similar community of people living immediately adjacent to Bennett Valley on the northern slopes of Sonoma Mountain.

Another planning document — this one prepared by the City of Santa Rosa Planning Department in May, 1970 — defined Bennett Valley as a much smaller area. The area covered by the Bennett Valley Junior High School Study was located partly within city limits and partly beyond them, extending east to include a portion of Grange Road and a short stretch of Bennett Valley Road beyond the Grange Road intersection.

"For the purposes of this report, Bennett Valley is defined as that area south of the State Highway 12 alignment, east of Taylor Mountain, and west of Bennett Mountain (see Location Map [attached to this petition as Exhibit 9.A.]). Bennett Valley itself is divided into two sub areas: upper Bennett Valley (south of the intersection of Bennett Valley Road and Matanzas Creek) and lower Bennett Valley (north of the intersection of Bennett Valley Road and Matanzas Creek)."

"Lower Bennett Valley" is currently within the city limits of Santa Rosa, and therefore outside of the proposed appellation. "Upper Bennett Valley" is a part of the proposed appellation. The demarcation between them is the topographical narrowing of the valley which is one of the characteristics separating the Bennett Valley viticultural area from the surrounding areas at its northwestern boundary. The following excerpt from the Bennett Valley Junior High School Study describes the use of geography to define the Upper Bennett Valley sub-area:

"Upper Bennett Valley: A narrowing of the valley by the Sonoma Mountains separates this area from lower Bennett Valley. At the present time, the area is devoted to agricultural uses. Residential development might be expected some time in the future, after the lower part of the Valley is developed. As much of upper Bennett Valley is hilly, the maximum General Plan density cannot be expected."

Modern histories of Bennett Valley viticulture. Two 20th century historians — Ernest P. Peninou and Irving McKee — have written of a Bennett Valley larger than the boundaries proposed in this petition. However, neither of their writings presented convincing evidence in support of larger Bennett Valley boundaries.

Ernest P. Peninou's 1998 book *History of the Sonoma Viticultural District, Comprising Sonoma, Marin, Lake, Mendocino, Humboldt, Trinity, Del Norte and Siskiyou Counties: The Grape Growers, the Wine Makers, and the Vineyards, lists twelve grape growers in his section on Bennett Valley, two of which (William Thompson and John Gottfried Schieck) lived on the Glen Ellen side of Sonoma Mountain. These two were also the only growers listed in that section who were located outside of Santa Rosa township (and similarly, outside of the Yulupa land grant). Significantly, none of Peninou's source materials appear to corroborate his decision to place these two growers in Bennett Valley. Both Thompson and Schieck were listed under "Glen Ellen," not "Santa Rosa" or "Bennett Valley," in each of the several 19th century viticultural directories reprinted in Peninou's book.*

Irving McKee's article, "Historic Sonoma County Winegrowers," which appeared in "CALIFORNIA — Magazine of the Pacific" in September 1955, mentioned the vineyard of Alfred La Mott as being located at "the eastern end of Bennett Valley, near Glen Ellen." [emphasis added] La Mott is another grower located on the Glen Ellen side of Sonoma Mountain, outside of Santa Rosa township. It is curious that earlier in the same article, McKee referred to another grower, "a man named Holman," who "planted one thousand Mission vines at the eastern end of Bennett Valley in 1854." [emphasis added] As Exhibit 7 shows, Holman's location "at the eastern end of Bennett Valley" was well within the proposed viticultural area, while La Mott's location "at the eastern end of Bennett Valley" was substantially outside of it.

Articles featuring Bennett Valley grapegrowing. Sonoma Valley was the focus of an entire issue of "Connoisseur's Guide to California Wines" (Vol. 4 No. 4) shortly before that viticultural area was formally established. Nine sub-regions within the larger appellation were identified and discussed. A map of the nine sub-regions appears as Exhibit 10. Bennett Valley is presented as sub-region 9, and the area shown on the map supports the boundaries requested in this petition.

Ray Smith, in his Press Democrat article quoted above, and Mary Tanner in her feature magazine story on Bennett Valley mentioned previously, both reported on growers in Bennett Valley as it was *politically* defined. Their reasons for doing so are quite understandable, given the fact that the Bennett Valley Area Plan had only recently been created at the time both articles were written, and was of major significance to the local residents in the Santa Rosa area.

In addition to featuring the growers David Steiner and Sandra MacIver, who established vineyards in the area covered by this petition,⁵ Smith interviewed Patrick Campbell, owner of Laurel Glen Vineyard for his article, "Move Over Napa, Here Comes Bennett Valley." Campbell's vineyard is located on Enterprise Road, on the Glen Ellen side of Sonoma Mountain AVA. The article reported,

"Campbell and his wife, who came to the valley [i.e., Bennett Valley] about four years ago, own 13 acres of grapes at about the 1,000-foot level on a slope of Sonoma Mountain...."

At the time, according to Smith's article, both Steiner and Campbell were members of the county planning commission, and MacIver was on the Bennett Valley Citizen's Study Committee.

Mary Tanner's article, "Bennett Valley: Taking Control of its Destiny," lists a number of growers on Enterprise Road, in addition to Patrick Campbell, in her coverage of the Bennett Valley grape growing area. However the place name "Sonoma Mountain" is repeatedly used by the Enterprise Road growers who were interviewed, as well as by the writer. Politically, the area they were referring to as "Sonoma Mountain" may have been covered by the Bennett Valley Area Plan, but viticulturally, it was beginning to establish its own identity as a grape growing area, separate from Bennett Valley. (The petition to establish Sonoma Mountain as a viticultural area was submitted only thirteen months after Tanner's article appeared.)

Following are three selections from Tanner's article illustrating the repeated references to Sonoma Mountain by Enterprise Road growers [emphasis added]:

"Patrick Campbell ... and his wife, Faith, own and lease about 30 acres of vineyards, most of which is Cabernet. 'One of the keys to

⁵ The former Steiner vineyard (it has been sold since the article was written) is located in the area where Sonoma Mountain AVA and the proposed Bennett Valley AVA overlap; the vineyards at Matanzas Creek Winery planted by Steiner and MacIver are on the valley floor proper.

selecting a good grape for a given area is to choose whatever ripens the latest for your area — whatever will hang the longest on the vine,' explains Patrick. On *Sonoma Mountain* it's Cabernet."

"Mike Topolos ... has owned 50 acres of vineyard on Enterprise Road since 1972. 'We planted the vineyard in 1973 with Chardonnay, Zinfandel, and Johannisberg Riesling and it's just now maturing. I'll release a Sonoma Mountain Zin and Chardonnay next year,' says Topolos."

"H. Coturri & Sons consists of Harry (he's the 'H'), and sons Tony (winemaker) and Phil (vineyard manager). The Coturris bought a weekend home on Enterprise Road in 1965, and in 1974 Tony and Phil started making wine.... Yet Tony ... is somewhat pessimistic about their future on *Sonoma Mountain*. 'This is a great grape growing area, but right now it's a race between grapes and houses and houses are winning.'"

Conclusion. In historic and current usage, almost all of the references to Bennett Valley found by the petitioners defined the boundaries of Bennett Valley in conformity with the boundaries specified in the petition. Close examination of the few exceptions to this rule supports the conclusion that defining the proposed appellation to include a larger area is not justified.

Evidence relating to creating a partial overlap between Bennett Valley AVA and Sonoma Mountain AVA

It is ATF's policy to create partial overlaps between viticultural areas only when the evidence strongly supports doing so. That criterion is certainly met in this case. The area of proposed overlap contains geographic features common to both Bennett Valley and to Sonoma Mountain, and therefore should not properly be excluded from either appellation.

Geographical evidence. Several characteristics of the Sonoma Mountain AVA were recognized by ATF in its approval of the appellation as an American viticultural area. These are (1) the high incidence of Spreckels loam in the vineyards planted in the area; (2) the similar elevations shared by the vineyards; and (3) the "thermal belt" phenomenon, characterized by drainage of cold air and fog from the slopes to lower elevations, giving Sonoma Mountain vineyards lower maximum temperatures and higher minimum temperatures, year-round, than lower elevations. All of these characteristics apply to Sonoma Mountain appellation vineyards on both sides of the mountain.

It is also true, however, that the area of proposed overlap displays unique geographic characteristics which link it to Bennett Valley; these characteristics are absent on the Glen Ellen side of the Sonoma Mountain appellation. These characteristics include (1) greater marine influence due to the proximity of the Crane Canyon/Grange Road wind gap; (2) drainage into Matanzas Creek rather than into Sonoma Creek; (3) similar distribution of soils as in the rest of the proposed Bennett Valley appellation, including similar percentage occurrence of the two most commonly found soils — Goulding clay loam and Goulding cobbly clay loam — and an absence of Red Hills loam. All of these characteristics apply only to the area of proposed overlap, and not to the Glen Ellen side of Sonoma Mountain AVA.

These differences have been publicly recognized. When Mary Tanner interviewed Patrick Campbell three years after Ray Smith's article was published, Campbell had literally doubled his experience growing grapes at his Sonoma Mountain ranch. Campbell told Tanner what he had learned about the difference between what he had come to think of as "Sonoma Mountain" and the area where David Steiner's grapes were growing:

"I feel the soil on Sonoma Mountain is more closely related to Glen Ellen than to Dave Steiner's grapes or those on the valley floor."

The above conclusion may explain the differences between the statements David Steiner and Patrick Campbell made to their interviewers about their respective

vineyards. Smith described Campbell's vineyard, as follows: "Planted by former owners who called the place Laurel Glen Vineyards, the grapes are high in tonnage and quality...." In contrast, Steiner told Tanner, "The Bennett Valley is not a high-producing vineyard area.... But the cool coastal influence will grow exceptional grapes in a good year, and very good grapes most years." [Emphasis added.]

The geographic contrasts between the vineyards on Enterprise Road and the vineyards in the overlap area are now virtually taken for granted by the grape growing community on Sonoma Mountain. The differences were openly discussed in an article featuring Sonoma Mountain viticultural area, "Pinot Noir Has a Toehold in Land of Cabernet," by Michele Anna Jordan, which appeared in the "Press Democrat Sonoma Traveler Section" on November 24, 1999.

"There are at least two distinct growing regions within the Sonoma Mountain appellation, the east-facing or Glen Ellen side, and the Santa Rosa-Petaluma side, with its west and northwest orientation. The Glen Ellen side, sheltered as it is from the afternoon breezes rushing through the Petaluma Gap, can be quite hot, ideal for the cabernet sauvignon that has been considered the jewel of the mountain, its success well documented by the success of numerous vintages."

The reference to Pinot Noir in the title of Jordan's article was based on conclusions David Steiner had reached as a result of his sixteen years of experience growing grapes on the cooler Santa Rosa side of Sonoma Mountain:

"David Steiner planted cabernet sauvignon on the Santa Rosa side of the mountain in 1973, but recently he's turned his attention toward the Burgundy temptress [pinot noir]. 'I think Sonoma Mountain is a very good place for pinot noir, 'he says. 'There is a lot of coastal influence on the west side, particularly from the wind. There is full sun all year long, but it's not hot so you have light intensity without heat...."

His comments to Jordan apply only to the west side of Sonoma Mountain AVA, and underscore the differences between the two sides of that appellation.

Historical evidence. In addition to geographical evidence, historical evidence supports the overlap. Several of the Santa Rosa township grape growers historically linked to Bennett Valley were located in the proposed area of overlap. (See **Exhibit F**.)

In addition, the vineyard planted by David Steiner on the northwest-facing slopes of Sonoma Mountain, within the area of overlap, has received widespread recognition as one of the first modern vineyards in Bennett Valley. It is quite significant that none of the published references to this vineyard, including Michele Anna Jordan's recent article, have said *anything* to change or diminish the connection between this vineyard and its Bennett Valley identity.

Conclusion. While the area of proposed overlap possesses all the characteristics recognized as belonging to the Sonoma Mountain appellation, it clearly possesses — in equal measure — features belonging to the Bennett Valley appellation. Moreover, the geographical and historical evidence set forth above, which supports the creation of a partial overlap between Bennett Valley viticultural area and Sonoma Mountain viticultural area, is strong enough to meet ATF's high standards for partial overlaps and to virtually necessitate approval of the boundaries as proposed.

Evidence relating to creating a partial overlap between Bennett Valley AVA and Sonoma Valley and Sonoma Coast AVAs

The southwestern boundary of the proposed Bennett Valley viticultural area includes a small area of land which falls outside the current boundaries of Sonoma Valley AVA and within Sonoma Coast AVA.

Bennett Valley is conceived as being a sub-appellation of Sonoma Valley, and it was the petitioners' original intention to utilize the applicable portion of the Sonoma Valley boundary line as part of the Bennett Valley boundary. However, in the process of gathering evidence for this petition, we discovered a small vineyard, situated near the top of the ridge between Sonoma Valley and Petaluma Valley, which is divided by the Sonoma Valley line. Upon close examination, we saw that the vineyard actually lies entirely on the inland side of the Sonoma Mountains. It has been partially excluded from Sonoma Valley simply because the boundary line in that area only roughly approximates the ridge line, but does not precisely follow the local terrain.

For large appellations such as Sonoma Valley and Sonoma Coast, approximate boundary lines are used for convenience,⁶ and are certainly adequate. However, for small appellations such as Bennett Valley, it seems appropriate to be more exact in defining the boundaries — especially when a grower would be hurt by not doing so.

The terrain, soils, and microclimate in the area of proposed overlap are consistent with the Bennett Valley viticultural area, and the area is within the Matanzas Creek watershed. In addition, strong historical evidence supports the inclusion in Bennett Valley AVA of the overlapping area: the vineyard in question is on the property formerly owned by George N. Whitaker (shown as #11 in Exhibit 7), a grapegrower and winery proprietor connected with the viticultural history of Bennett Valley.

Conclusion. Including the proposed overlapping area is fully justified by the physical and historical evidence. Moreover, excluding it would unreasonably hurt the grower whose vineyard, in that case, would be divided.

⁶ Sara Schorske, author of the Sonoma Coast viticultural area petition, has prepared a letter in support of the proposed overlap, a copy of which is submitted with this petition.

Conclusion

The evidence presented in this petition clearly justifies the establishment of Bennett Valley as an American viticultural area, and the approval of the boundaries as requested. Differences in topography, drainage, soil distribution, and microclimate distinguish the proposed area from its surroundings. The areas of partial overlap with adjacent viticultural areas are well supported by the evidence presented. The petitioned area is widely known by the name Bennett Valley, and most published descriptions of the area agree with the proposed boundaries. Petitioners therefore respectfully request that ATF approve the Bennett Valley viticultural area as proposed.

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

Ву:

Printed name and title: Jean L. Arnold, CEO

Company/Vineyard: Matanzas Creek Winery

Address: 6097 Bennett Valley Road

City/State: Santa Rosa, CA

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By:

Printed name and title: Mat Phillips, Owne

Company/Vineyard: Greendale Vineyards

Address: 100 Mary - Paige Lave

City/State: Santa Rosa, Cay 93 404

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

Printed name and title: J PETER YOUNG MEMBER

Company/Vineyard: BENNETT WHEY UNCHAROF LLC

Address: 4100 GRANGE RO

City/State: SAMPS ROFA CA 95404

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By:

Printed name and title: Wosesh Dest

Company/Vineyard: Rubary + Vineyards

Address: 6500 Jameson Road

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By:	we to the	
Printed name and title:	Teresa F. Votruba	
Company/Vineyard:	Sonoma Hills	
Address:	4850 Peracca Rd.	
City/State:	Santa Posa CA 950	104
Pa	In tulis	1
	John Hills	
	4850 Peracca Rd.	
	Santa Resa (A	95404

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By: Maluf C. Hamitad

Printed name and title: Michael C. Haarstad owner

Company/Vineyard: Haarstad's Big moon Ranch

Address: 6511 Jamison Rd

City/State: Santa Rosa, Ca 95404

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By:

Printed name and title:

Company/Vineyard: _

Address:

City/State: _

John K. Bertyan, owner

Rolling Hills Konch

1 Granze Rd.

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By: Drave Klemanka Breef R

Printed name and title: Doncklanacka Bratt Rovan

Company/Vineyard: Klainecka - Raven Vineyard

Address: 5560 Bannatt Vallay ROAD

City/State: Santa KOSA CA 95404

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By: Charle R. Bang

Printed name and title: CHARLES R. BARRJR

Company/Vineyard: SABLE RIDGE VINEYARDS, LLC

Address: 63 20 JAMISON RD.

City/State: SANJA ROSA, CA 95404

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

Printed name and title: 5

Company/Vineyard:

Address:

City/State:

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By: James Lurons

Printed name and title: JAMES K. MOR. 218

Company/Vineyard: 295 Sonoma Redge LLC.

Address: 295 Sonoma Redge Rd.

City/State: Sanoma Redge Rd.

34 74× @ 10/14 pst.

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By: Johnson

Printed name and title: 5.3 Moore - owner

Company/Vineyard: Moones Viveyard

Address: 6538 Benned Unlay Rd

City/State: South Rosa, Costit.

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By:

Printed name and title: Sara Schorske

Company/Vineyard: Compliance Service of America

Address: 180 Old Highway 101

City/State: Gardiner, OR 97441

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

Ву:		+		<u></u>
Printed name and title:	BARRY	L Cox	, 0	WNOR
Company/Vineyard:	BENNET	T Man	TAIN	RANCH
Address:	5525	BONNE	77	laccen RP
City/State:	SAJTA	ROSA,	CA	95404

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

Printed name and title: _

Company/Vineyard: _

City/State: SANTA ROSA

We hereby request that the foregoing petition be approved as submitted, and Bennett Valley be established as an American viticultural Area.

Respectfully submitted,

By: Joe & Gail Judge

Printed name and title: Spil volge

Company/Vineyard: _

City/State: _

Petitioners

LEAD PETITIONER:

Jean L. Arnold, CEO Matanzas Creek Winery 6097 Bennett Valley Road Santa Rosa, CA

SUPPORTING PETITIONERS:

Matt Phillips, Owner Greendale Vineyards 100 Mary Paige Lane Santa Rosa, CA

J. Peter Young, Managing Member Bennett Valley Vineyards, LLC 4100 Grange Road Santa Rosa, CA

Joseph Destein, Owner Rubaiyat Vineyards 6500 Jamison Road Santa Rosa, CA

Teresa and John Votruba, Owner Sonoma Hills 4850 Peracca Road Santa Rosa, CA

Michael Haarstad, Owner Haarstad's Big Moon Ranch 6511 Jamison Road Santa Rosa, CA

John Bertram, Owner Rolling Hills Ranch 4889 Grange Road Santa Rosa, CA

Diane Kleinecke and Brett Raven Kleinecke-Raven Vineyard 5560 Bennett Valley Road Santa Rosa, CA

Charles R. Barr, Jr. Sable Ridge Vineyards, LLC 6320 Jamison Road Santa Rosa, CA

Sally Connell, Proprietor Bennett Valley Grange Vineyards 4737 Grange Road Road Santa Rosa, CA

Petitioners

James Morris 295 Sonoma Ridge, LLC 295 Sonoma Ridge Road Santa Rosa, CA

JD and Peggy Moore 6538 Bennett Valley Road Santa Rosa, CA

Sara Schorske Compliance Service of America PO Box 43 Gardiner, OR

Boundaries

The proposed Bennett Valley Viticultural Area is located entirely within the Sonoma Valley viticultural area in Sonoma County, California, between Santa Rosa and Glen Ellen. It is bounded on the west by the Sonoma Valley viticultural area boundary (at the approximate city limit of the City of Santa Rosa) and on the other three sides by the ridges that define the watershed of Matanzas Creek.

Boundaries are found on four U.S.G.S. 7.5' series topographic maps, the Santa Rosa Quadrangle (1994), Kenwood Quadrangle (1954, photorevised 1980), Cotati Quadrangle (1954, photorevised 1980), and Glen Ellen Quadrangle (1954, photorevised 1980).

The beginning point is the peak of Taylor Mountain.

- 1. Proceed northeasterly to the intersection of the 560 foot elevation line with the section line separating Sections 31 and 32 (T7N, R7W),
- 2. Continue northeasterly in a straight line to the 500 foot elevation line (just inside the southern boundary of Section 20 (T7N, R7W)),
- 3. Continue southeasterly in a straight line to the middle peak in a group of three unnamed peaks in Section 28 (T7N, R7W),
- 4. Continue southeasterly in a straight line to a peak of elevation 1527 feet near the southeastern corner of Section 28 (T7N, R7W),
- 5. Continue southeasterly in a straight line to Bennett Mountain (elevation 1887),
- 6. Continue southeasterly in a straight line to a peak of elevation 1309 feet,
- 7. Continue southeasterly in a straight line to a peak of elevation 978 feet in Section 11 (T6N, R7W),
- 8. Continue southeasterly a short distance to the intersection of two unnamed unimproved roads (one traveling roughly east-west, the other going roughly south) near the line between section 12 and Section 11 (T6N, R7W),
- 9. Follow the southward heading unnamed road as it curves first easterly and then in a generally southerly direction, along the ridge dividing the

- Matanzas Creek watershed from the Sonoma Creek watershed, to its intersection with Sonoma Mountain Road in Section 13 (T6N, R7W),
- 10. Continue due south to the 1600 foot elevation line (in the southwest quadrant of Section 13 (T6N, R7W),
- 11. Follow the 1600 foot elevation line west to the point where it intersects the western line of Section 23 (T6N, R7W),
- 12. Proceed northwesterly in a straight line to an unmarked peak 920 feet in elevation in the southwestern corner of Section 15 (T6N, R7W),
- 13. Proceed northwesterly in a straight line to an unmarked peak 840 feet in elevation in the southwestern of corner of Section 9 (T6N, R7W),
- 14. Proceed northwesterly in a straight line to an unnamed peak 961 feet in elevation just inside the eastern border line of Section 8 (T6N, R7W),
- 15. Proceed northwesterly in a straight line to Taylor Mountain.

TEL: 800-400-1353 FAX: 541-271-1609 www.csa-compliance.com



POST OFFICE BOX 43 GARDINER, OR 97441 csa@csa-compliance.com

October 12, 2001

Bureau of Alcohol, Tobacco and Firearms 650 Massachusetts Avenue Washington, D.C. 20001

Re: Bennett Valley Viticultural Area Petition

To Whom It May Concern:

I am the author of the petition which successfully requested the establishment of Sonoma Coast Viticultural Area. Thus, I am very familiar with the geography of Sonoma County, and in particular, with the boundaries of Sonoma Coast AVA.

I am aware that the pending application for the establishment of Bennett Valley viticultural area requests a small area of overlap with Sonoma Coast, and I am in support of that proposal. Although I believe the existing Sonoma Coast poundary is still appropriate, given the size and scale of that appellation, I also believe that the greater precision in defining the ridge between Sonoma Valley and Petaluma Valley which resulted in a different Bennett Valley boundary is equally appropriate, given the size and scale of the smaller appellation.

I have also reviewed the physical and historical evidence supporting the inclusion of the overlapping area within Bennett Valley, and I believe that the proposal is sound.

I urge you to approve the Bennett Valley appellation as described in the petition.

Very truly yours,

Sara Schorske



February 5, 2002

Ms. Nancy Sutton BATF 221 Main Street, 11th Floor San Francisco, CA 94105

Re: Bennett Valley AVA Petition

Dear Ms. Sutton:

In response to your request for additional documentation and information regarding the viticultural area petition to establish the Bennett Valley American Viticultural Area, we are providing the following:

1. The amounts of overlapping acreage with:

(a) Sonoma Mountain: 1062.84 acres (b) Sonoma Coast: 281.28 acres

2. Percentage amounts for:

(a) Bennett Valley petitioned area acres w/in Sonoma Valley AVA: 7.20%

(b) Sonoma Mountain AVA acres w/in petitioned Bennett Valley area: 12.73%

(c) Sonoma Coast AVA acres w/in the petitioned Bennett Valley area: 3.36%

The above percentages were calculated using an updated figure of 8350 for the total acreage of the proposed area, including the area of overlap with Sonoma Coast, in accordance with the most up to date boundary proposal. A printed copy of the revised boundary description is enclosed, and an electronic copy is being separately e-mailed to you. A map showing the newly revised boundary is also enclosed.

The newest boundary description eliminates a small portion of the previously proposed area of overlap with Sonoma Coast, because when closely examining the terrain of the proposed overlap we discovered that a small portion drained to the west, into the Petaluma Valley. The proposed AVA boundary has been revised to more accurately

follow the physical watershed boundary, and the current proposed area for Bennett Valley AVA is entirely within the Matanzas Creek watershed.

3. and 4. You requested a map showing the locations of vineyards in the overlapping areas and a map showing vineyards outside of, but close to, the proposed Bennett Valley boundary lines, if any. Enclosed are two maps showing vineyard locations in relation to the relevant AVA boundaries. The first shows vineyard locations known to the Sonoma County Agricultural Commissioner at this time. The second shows vineyard information provided by the Sonoma County Grapegrowers Association. (Please note: these maps were prepared before the most recent revision to the proposed boundary description, so the southwestern part of the Bennett Valley AVA boundary line is slightly inaccurate as shown. We did not redo the maps because the change did not affect any nearby vineyards.)

This is the best information we can provide at this time. We believe there are at least two other vineyards, shown on neither map, located on the north side of Bennett Valley Road east of Bennett Ridge Road (both outside the proposed Bennett Valley AVA boundary). One is a Syrah vineyard which is visible from the road and has a sign identifying it as "El Farolito Vineyard." The other is farther east, off a road named Savannah Trail; we have not seen it, but have heard that "there are vineyards in there."

5. You requested pertinent rainfall data, if any. There are no long term precipitation records from official weather stations inside Bennett Valley. The nearest official stations are in Santa Rosa, El Verano, and Sonoma.

However, we have unofficial information from a lifelong Bennett Valley resident, petitioner Matt Phillips, who has monitored rainfall at his home for many years using a commercial rain gauge. The highest rainfall he has recorded in one season was 52 inches. He reports that at his location in Bennett Valley (in the foothills) rainfall is normally between 36 to 40 inches. This is significantly higher than average precipitation recorded at official weather stations in Santa Rosa (29.95 inches) to the northwest, and at El Verano (30.25 inches) and Sonoma (27.96 inches) to the southeast. (Figures for official weather stations were taken from *Climate of Sonoma County* by Robert Elford.) Mr. Phillips also reports that 75% of the annual precipitation in the area falls between mid December and the end of February.

Because rainfall varies significantly with elevation, and is also affected by proximity of sheltering terrain and by wind patterns, we expect that precipitation varies from place to place within the proposed Bennett Valley viticultural area. At the lowest elevation point closest to Santa Rosa, we would expect annual precipitation closer to 30 inches. At the higher elevations, precipitation is likely to conform to the experience of Mr. Phillips.

The Sonoma County Soil Survey documents a relationship between soil type and local climate. This is a reasonable relationship given the fact that soils develop from underlying parent material in varying ways depending on climatic and other natural factors, including rainfall. The annual rainfall figures given above are within the ranges stated in the Soil Survey for the predominant soil types.

For Goulding and Toomes soils (the most prevalent soils at the higher elevations), the Soil Survey cites expected annual rainfall between 30 and 50 inches. For Spreckels soils, the next most common type, it cites expected annual rainfall between 25 and 35 inches. Other soils found in significant quantities in Bennett Valley include Haire soils (predicted to experience 25 to 45 inches annual rainfall), Laniger soils (30 to 60 inches), Los Robles soils (25 to 35 inches), and Pleasanton soils (25 to 40 inches).

6. You requested any available evidence to document the following statement from the fourth paragraph on page 34 of the petition: "The terrain, soils, and microclimate in the area of proposed overlap [with Sonoma Coast AVA] are consistent with the Bennett Valley viticultural area...."

Terrain. The most important geographic feature that the area of overlap has in common with the rest of the proposed Bennett Valley AVA is its location in the Sonoma Mountain foothills and within the Matanzas Creek watershed. It is located entirely on the Sonoma Valley side of the ridge that divides Sonoma Valley from Petaluma Valley, and, like the rest of the proposed appellation, it is in the Russian River drainage system.

Elevations are also consistent with the rest of the proposed area. Elevations within the area of proposed overlap range from 680 to 960 feet. This is similar to the elevations found in the remainder of the proposed area, 45% of which are between 670 and 1075 feet in elevation.

Soil. Goulding soils predominate soils in the area of overlap, as they do in the remainder of the proposed area. 50.2% of the proposed area outside of Sonoma Coast is comprised of Goulding soils (Goulding clay, Goulding cobbly clay, and Goulding-Toomes complex). Approximately half of the overlap area is also comprised of this group of soils. Minor soils in the area of overlap include Spreckels loam, Laniger loam, and Pleasanton-Haire complex, all of which are also found in the remainder of the proposed area.

Climate. Enclosed is an updated version of Exhibit 5A. The exhibit submitted with the original petition displayed data for the 2000 growing season for three vineyards in Bennett Valley and three vineyards in growing regions known to have excellent climate support for reliably ripening Cabernet Sauvignon grapes. The enclosed copy shows the

same data for the 2001 growing season, with the addition of a vineyard in the area of overlap with Sonoma Coast. The updated exhibit clearly shows the similarity in climate between the area of overlap and the remainder of the proposed Bennett Valley appellation.

7. You requested our interpretation of the climatic zone variations within the proposed Bennett Valley boundary area shown in Exhibits 5C and 5D, and how they should be considered. Frankly, your observation brought to our attention that the AVA boundary lines drawn on those two exhibits were inaccurate. As you can imagine, it is difficult to locate AVA boundaries on such small scale maps that themselves contain so little detail. In the last minute push to complete the exhibits before the original submission of the petition, we didn't check the final copies carefully enough to notice the climate differences within the marked boundaries; if we had, we would have corrected them before submission. Corrected copies are enclosed.

You also asked the following questions:

- 1. Are all the petition signers, excepting Sara Schorske, located within the proposed area? Yes, they are.
- 2. Is the unnamed road mentioned in paragraph 9 of the boundary description straight for about 1.25 inches north of Sonoma Mountain Road? That is correct.

Please direct any future questions and correspondence regarding this AVA petition directly to Lead Petitioner Matanzas Creek Winery at the following address:

8741 Brooks Road South Windsor, CA 95492

ATTN: Susan Cagann, Chief Legal Officer

Sincerely,

Susan C. Cagann
Chief Legal Officer

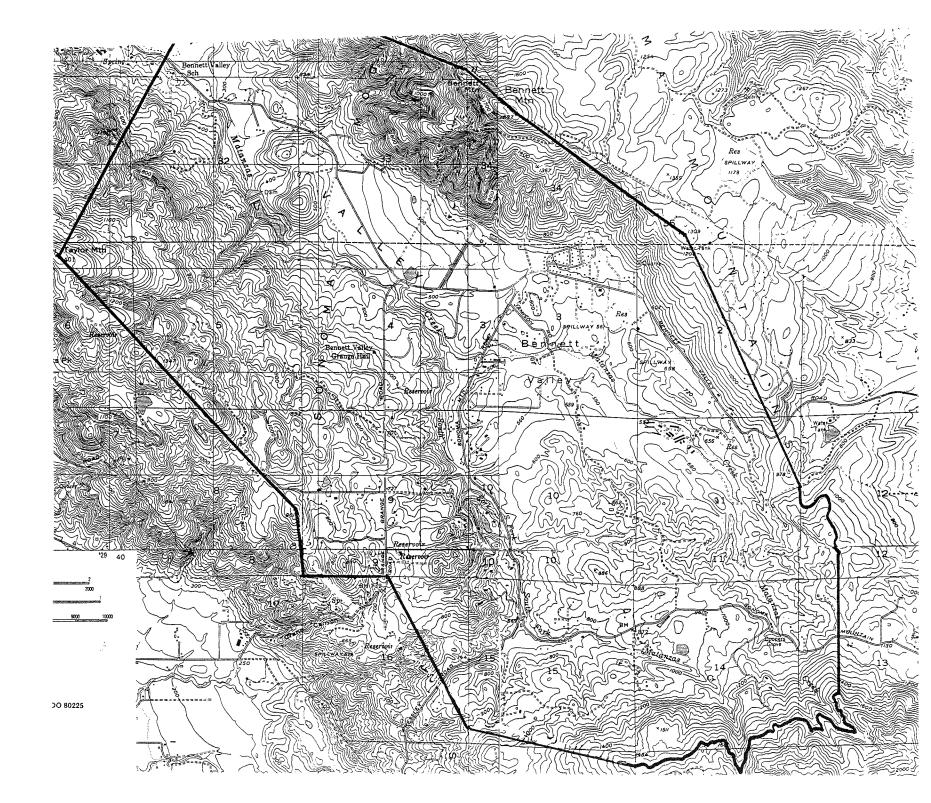
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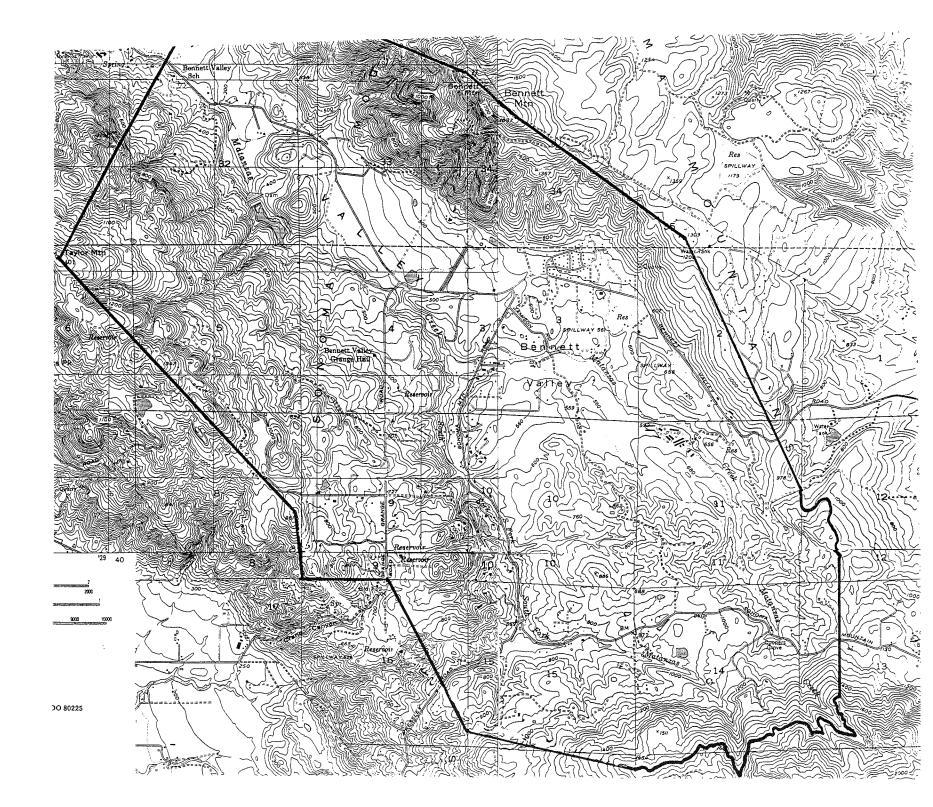
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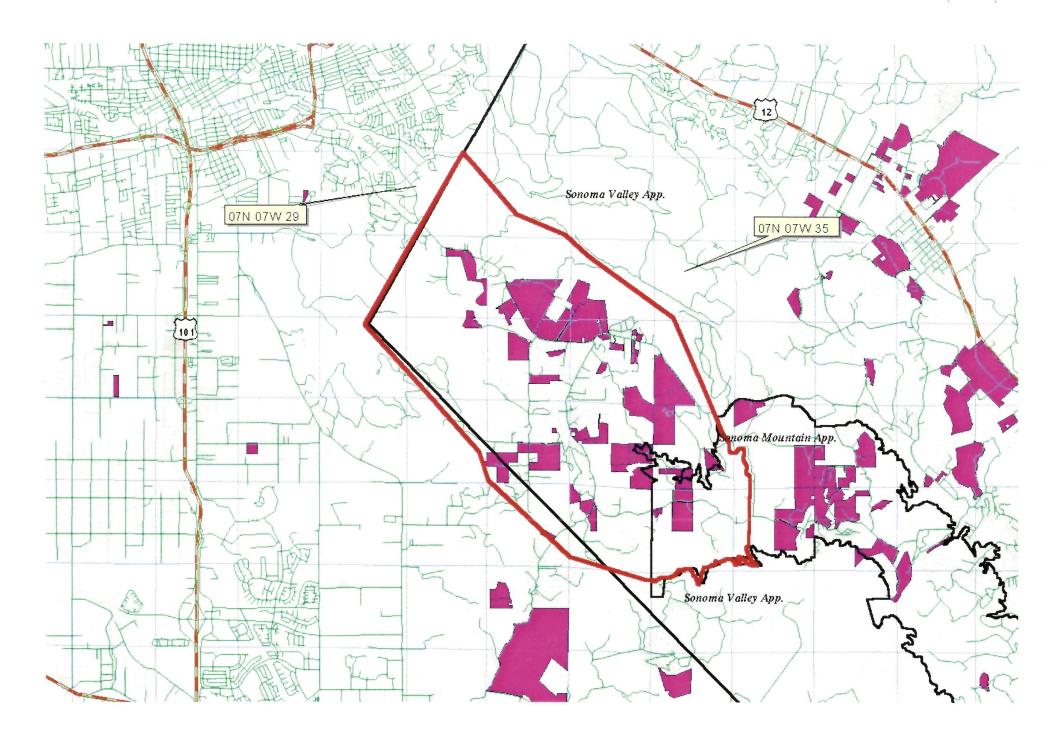
The beginning point is the peak of Taylor Mountain.

- 1. Proceed northeasterly to the intersection of the 560 foot elevation line with the section line separating Sections 31 and 32 (T7N, R7W),
- 2. Continue northeasterly in a straight line to the 500 foot elevation line (just inside the southern boundary of Section 20 (T7N, R7W)),
- 3. Continue southeasterly in a straight line to the middle peak in a group of three unnamed peaks in Section 28 (T7N, R7W),
- 4. Continue southeasterly in a straight line to a peak of elevation 1527 feet near the southeastern corner of Section 28 (T7N, R7W),
- 5. Continue southeasterly in a straight line to Bennett Mountain (elevation 1887),
- 6. Continue southeasterly in a straight line to a peak of elevation 1309 feet,
- 7. Continue southeasterly in a straight line to a peak of elevation 978 feet in Section 11 (T6N, R7W),
- 8. Continue southeasterly a short distance to the intersection of two unnamed unimproved roads (one traveling roughly east-west, the other going roughly south) near the line between section 12 and Section 11 (T6N, R7W),
- 9. Follow the southward heading unnamed road as it curves first easterly and then in a generally southerly direction, along the ridge dividing the Matanzas Creek watershed from the Sonoma Creek watershed, to its intersection with Sonoma Mountain Road in Section 13 (T6N, R7W),
- 10. Continue due south to the 1600 foot elevation line (in the southwest quadrant of Section 13 (T6N, R7W),
- 11. Follow the 1600 foot elevation line west to the point where it intersects the western line of Section 23 (T6N, R7W),
- 12. Proceed northwesterly in a straight line to point where the 900 foot contour line crosses the common line between Sections 15 and 16 (T6N, R7W),

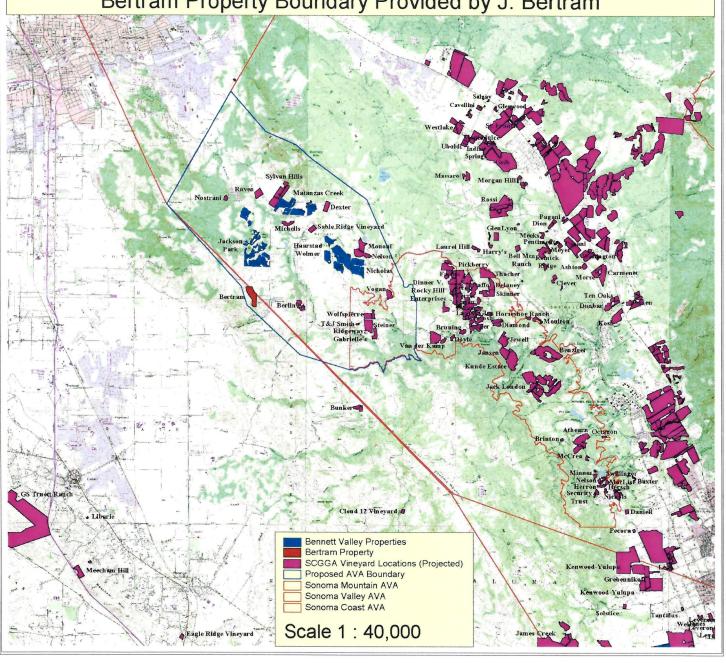
- 13. Proceed northwesterly in a straight line to point where Grange Road intersects the southern section line of Section 9 (T6N, R7W),
- 14. Follow the southern section line of Section 9 due west to the southwestern corner of the section,
- 15. Proceed northwesterly in a straight line to an unnamed peak 961 feet in elevation just inside the eastern border line of Section 8 (T6N, R7W),
- 16. Proceed northwesterly in a straight line line to Taylor Mountain.

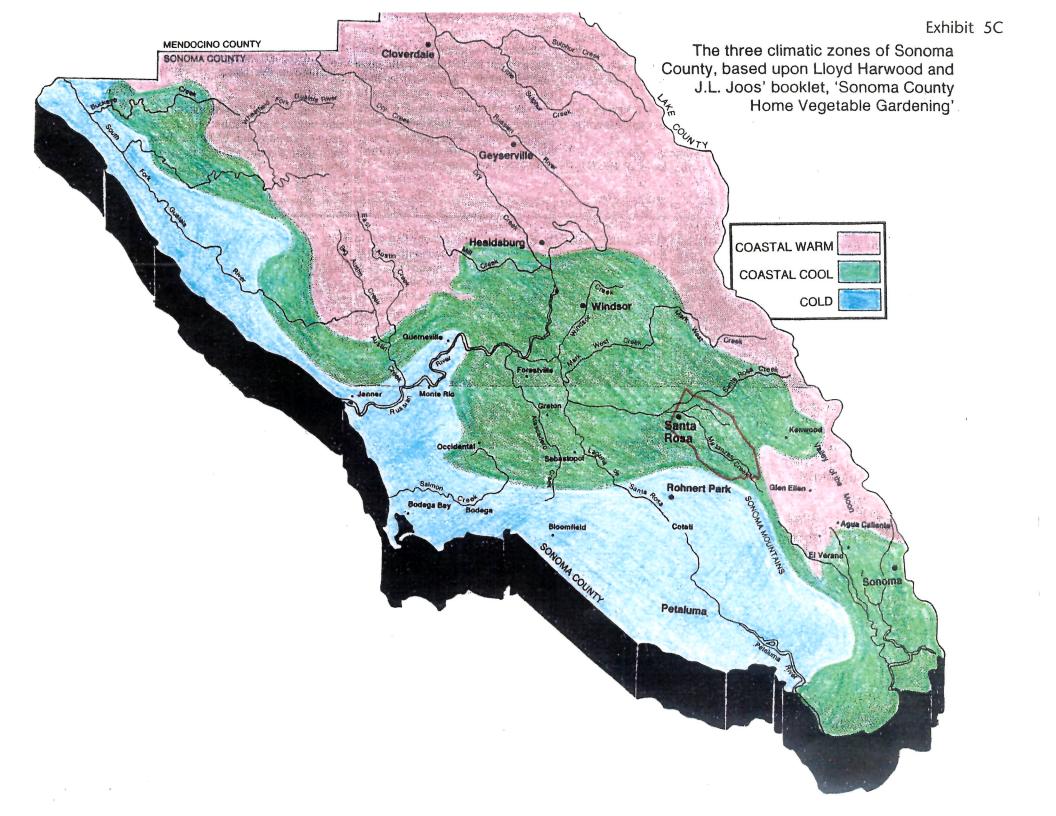




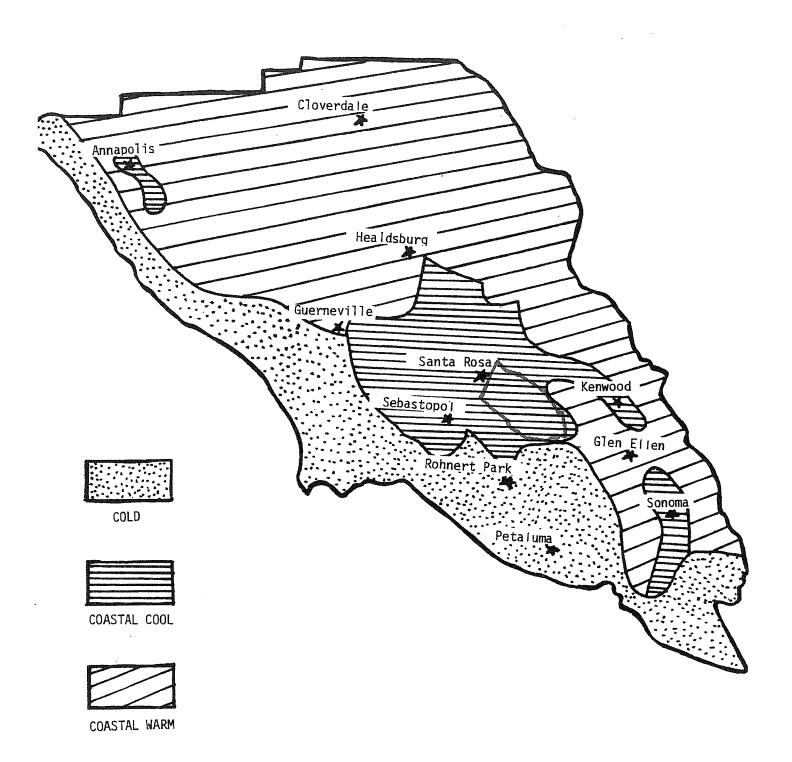


External Vineyard Locations Provided by SCGGA Internal Vineyard Locations by In-House GIS and Bertram Property Boundary Provided by J. Bertram

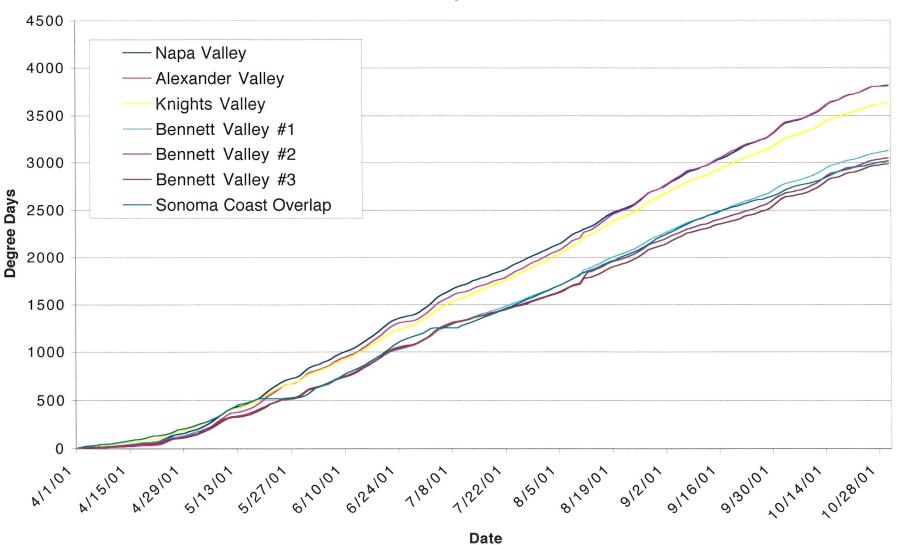




SONOMA COUNTY CLIMATIC ZONES



Bennett Valley Climate vs. Cabernet Vineyards Elsewhere



Exhibits

1. LOCATION

- 1.A. Location map of proposed viticultural area showing roads and other features
- 1.B. Location map of proposed viticultural area showing physical relief

2. PHOTOS

- 2.A. Legend describing photos
- 2.B. Map showing photo locations
- 2.C. Photos of Bennett Valley and vicinity

3. SOIL MAP

Color coded soil map of Bennett Valley and vicinity

4. FOG GAPS

- 4.A. Map of Fog Gaps and Barriers from Weather of the San Francisco Bay Region by Harold Gilliam
- 4.B. Sonoma/Napa AAA map showing roads through wind gaps north and south of Sonoma Mountain

5. CLIMATE

- 5.A. "Bennett Valley Climate vs. Cabernet Vineyards Elsewhere" chart showing degree days comparison
- 5.B. Figure 11 (Highest Observed Temperature) from *Climate of Sonoma County* by Robert Elford
- Map of Three Climatic Zones of Sonoma County, published in "Santa Rosa Press Democrat," March 20, 1986
- 5.D. Sonoma County Climatic Zones map and legend from *Fruits, Nuts, Berries and Grapes of Sonoma County*, by Paul Vossen, published by the University of California Cooperative Extension, 1985

6. SONOMA COUNTY LAND GRANTS

- 6.A. Map from Land Grants of Sonoma County, by ESL California History Class, Forestville, CA, 1994
- 6.B. Sonoma County township map from Historical Atlas Map of Sonoma County California, published by Thos. H. Thompson & Co., 1877
- 6.C. Map from page 11 of *Illustrated Atlas of Sonoma County California*, published by Reynolds & Proctor, Santa Rosa, CA, 1897, showing historic schoolhouse locations

7. LOCATIONS OF HISTORIC GRAPEGROWERS LINKED TO BENNETT VALLEY

- 7.A. Pages 43, 51, and 54 from *Historical Atlas Map of Sonoma County California*, published by Thos. H. Thompson & Co., 1877
- 7.B. Pages 51, 58, and 59 from *Illustrated Atlas of Sonoma County California*, published by Reynolds & Proctor, Santa Rosa, CA, 1897

8. HISTORIC BENNETT VALLEYGRAPEGROWERS

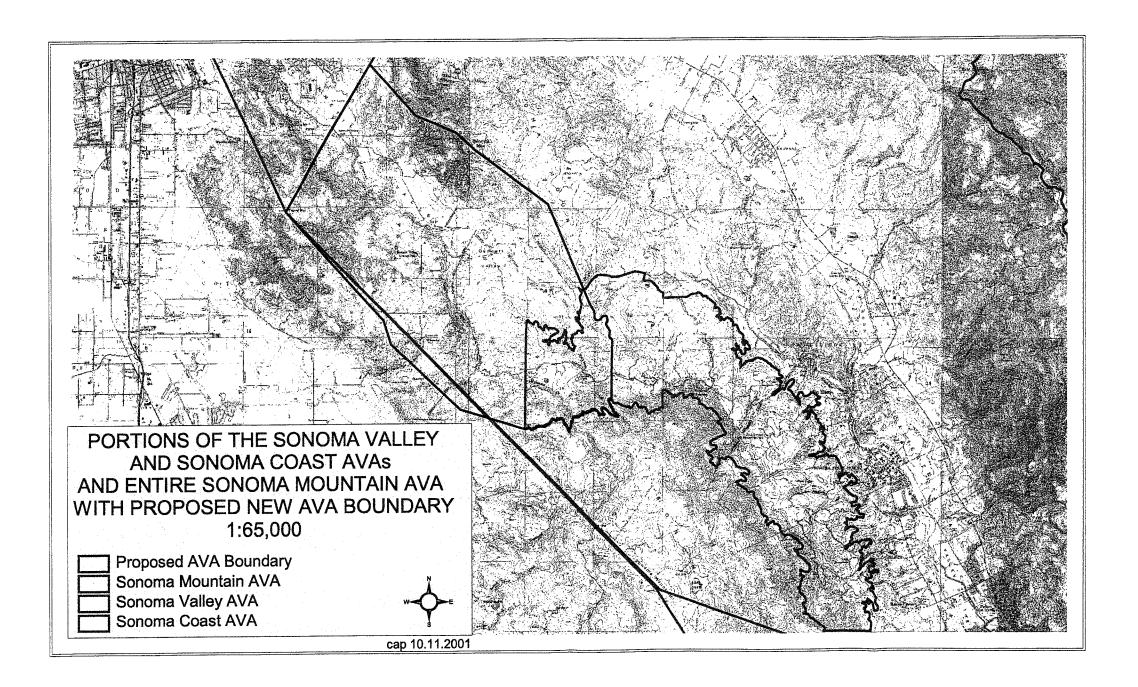
Engravings from page 77 of *Historical Atlas Map of Sonoma County California*, published by Thos. H. Thompson & Co., 1877, showing ranches "at the mouth" and "at the head" of Bennett Valley

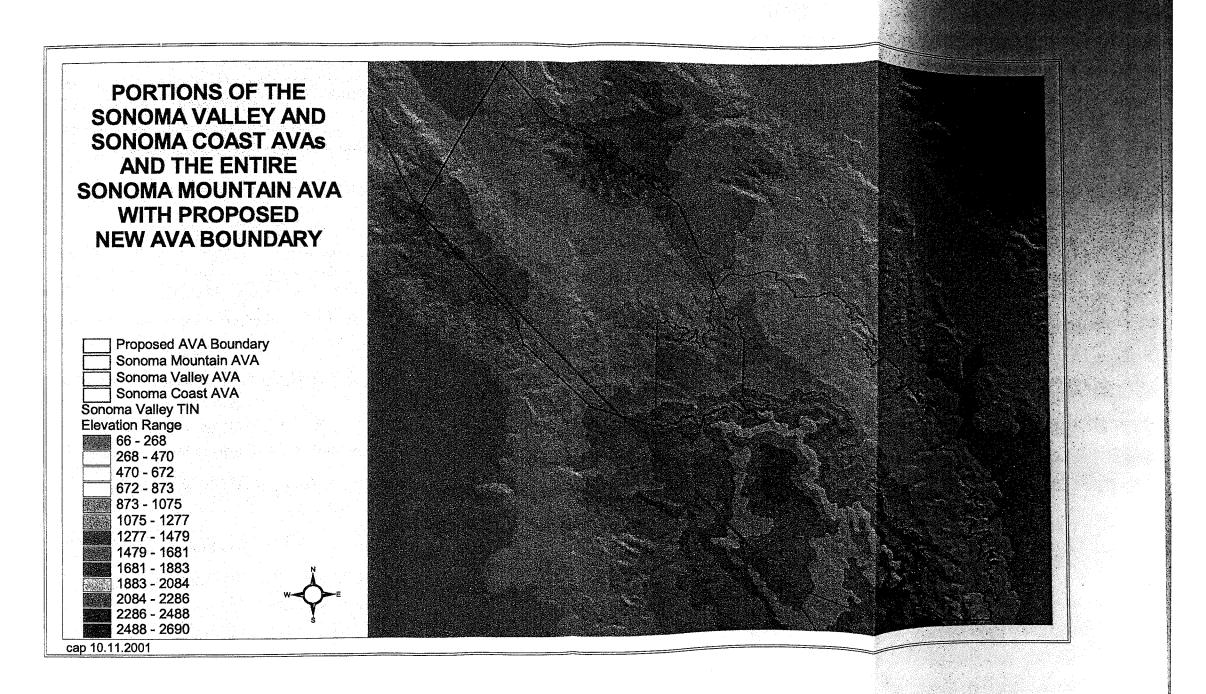
9. SONOMA COUNTY PLANNING MAPS:

- 9.A. Location Map from Bennett Valley Junior High School Study
- 9.B. Regional Location Map from Bennett Valley Area Plan
- 9.C. Topography Map from Bennett Valley Area Plan
- 9.D. Sub-Areas Map from Bennett Valley Area Plan

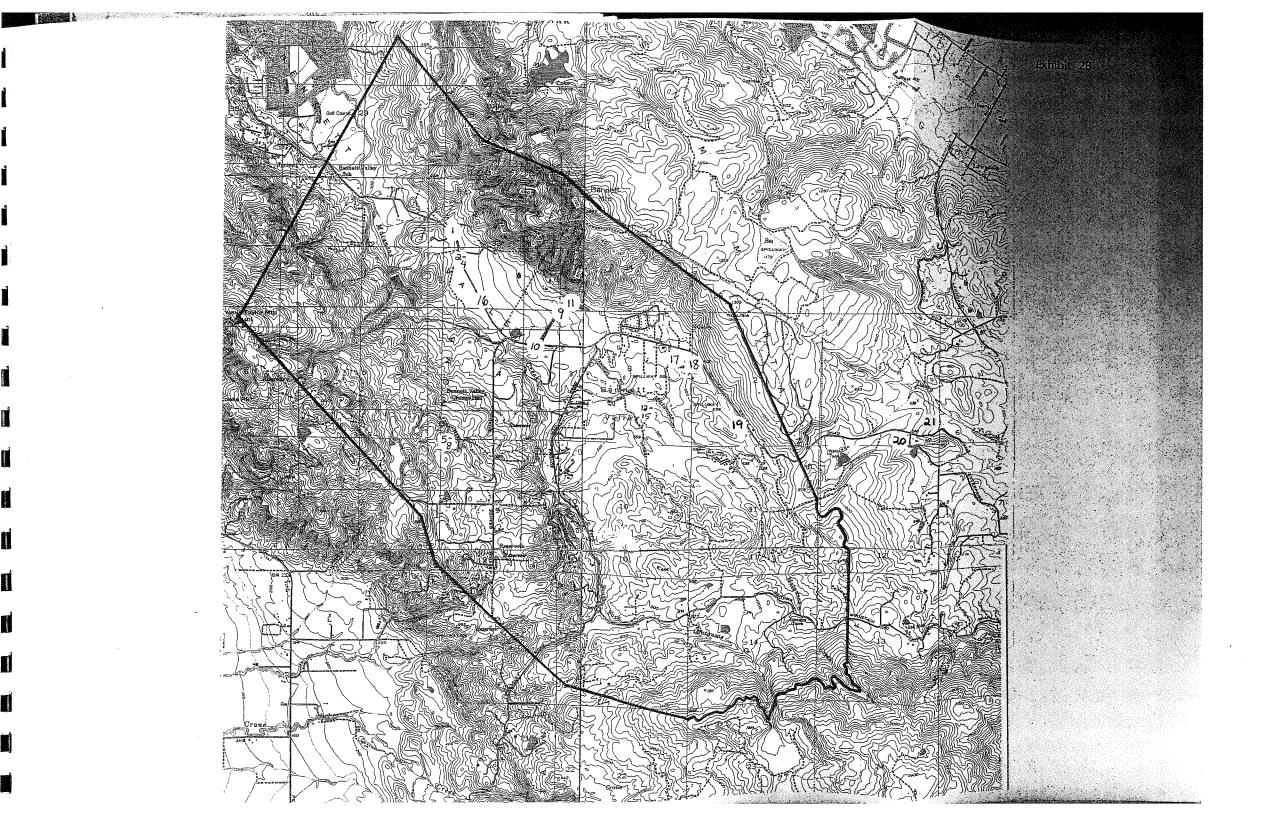
10. SONOMA VALLEY SUB-AREA MAP

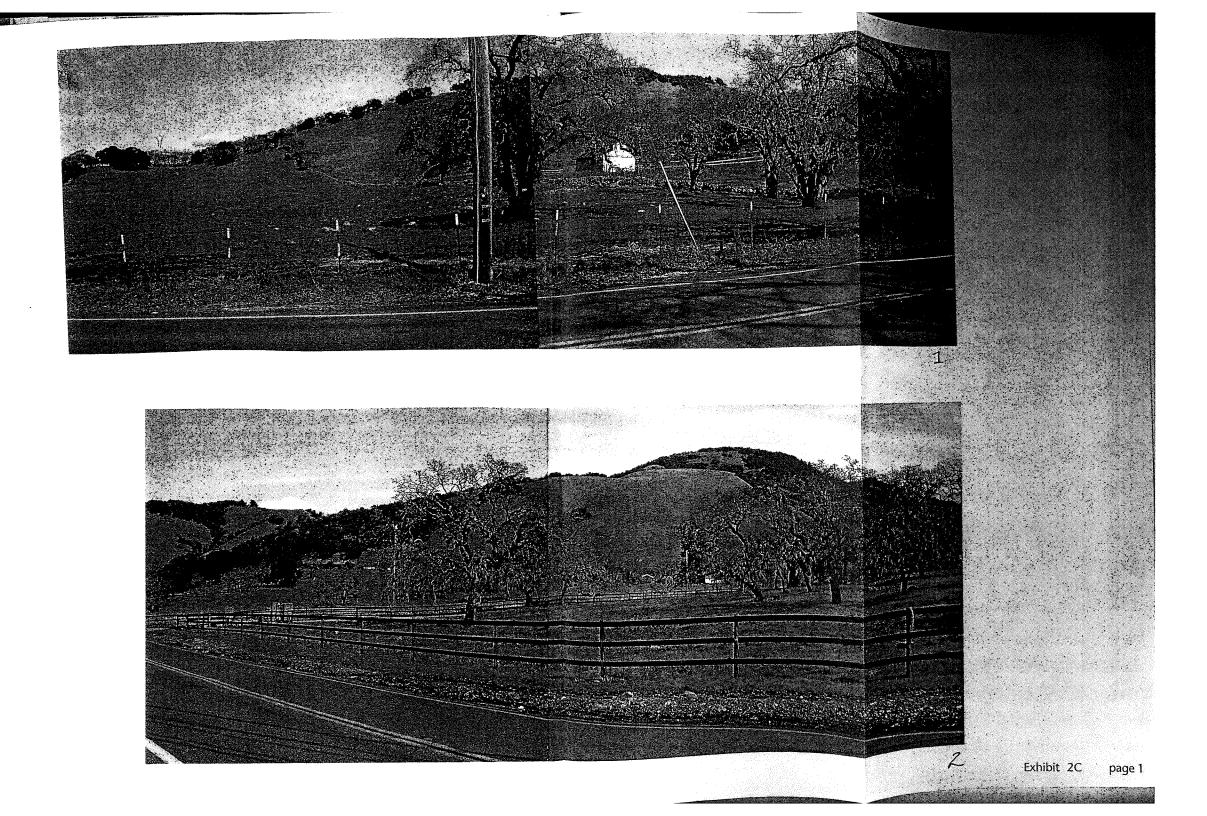
Map from "Connoisseur's Guide to California Wine," issue on Sonoma Valley (Vol. 4, No. 4)



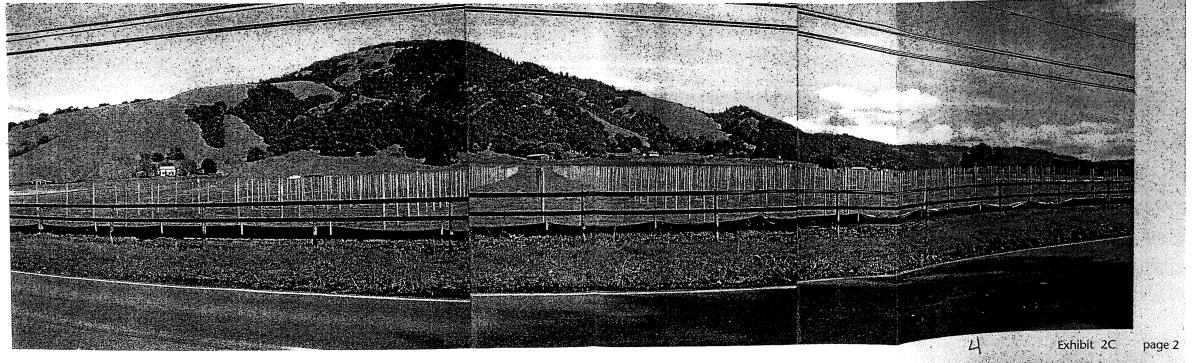


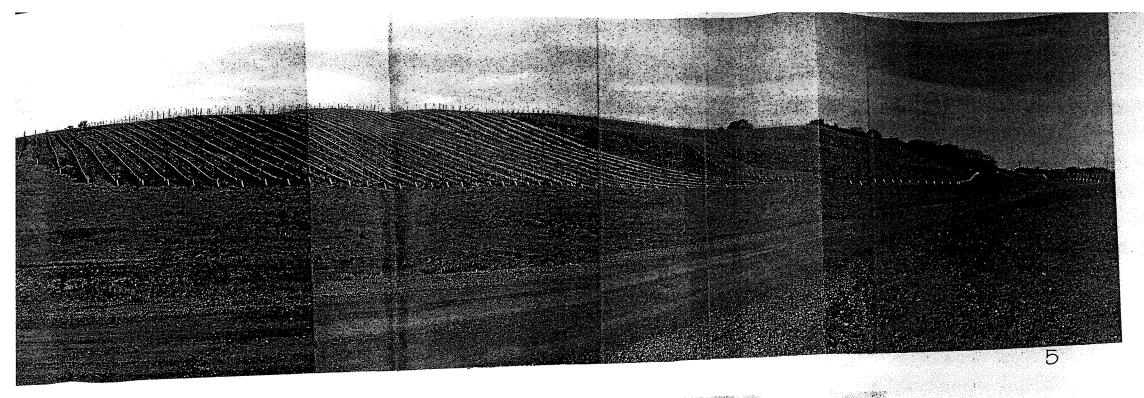
Description of Photo No. View to north from 5266 Bennett Valley Road (west end of AVA) 1 View to north from 5550 Bennett Valley Road (east of photo #1) 2 View to south from 5550 Bennett Valley Road 3 View to north from past 5550 Bennett Valley Road 4 Merlot vineyards at Jackson Park Ranch off of west side of Grange Road (facing 5 southwest) East view from Jackson Park Ranch 6 North view from Jackson Park Ranch (Bennett Mountain visible on right) 7 West view from Jackson Park Ranch (distant hills of Russion River area visible in 8 background) Matanzas Creek Winery driveway looking toward Bennett Valley Road 9 Vineyards at Matanzas Creek Winery 10 View south towards Bennett Valley Road from Matanzas Creek Winery 11 Facing northeast from Harstaad-Wolmer Vineyard (showing foothills between vineyard 12 and Bennett Valley Road) Facing east from Harstaad-Wolmer Vineyard (Sonoma Mountain in background) 13 Facing south from Harstaad-Wolmer Vineyard (Bennett Mountain in background) 14 Facing northwest from Harstaad-Wolmer Vineyard 15 View of the north side of the valley taken from Bennett Valley Road looking east 16 (Matanzas Creek Winery visible) Vineyard at 6600 Bennett Valley Road (south of the road) 17 Vineyard on south side of road across from 6675 Bennett Valley Road 18 Large, very young vineyard on south side of Bennett Valley Road (next address to the 19 east is 7129 Bennett Valley Road) Vineyards to the south at the intersection of Enterprise Road and Bennett Valley Road 20 (outside AVA) View to the north taken at location on Bennett Valley Road east of AVA boundary; hills 21 on north side of Sonoma Valley are visible

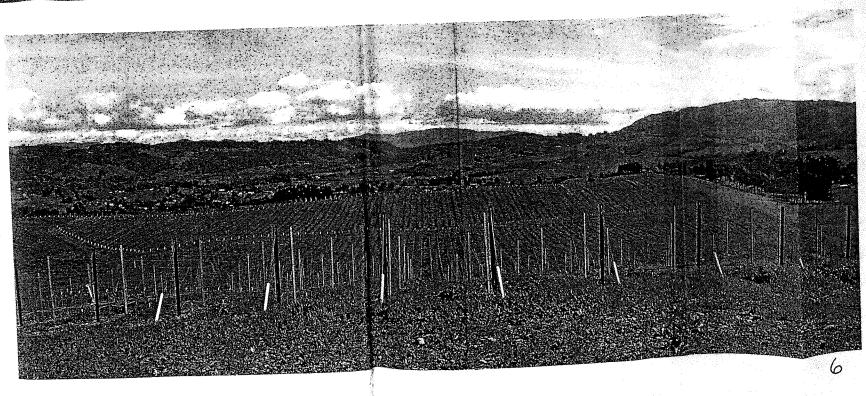














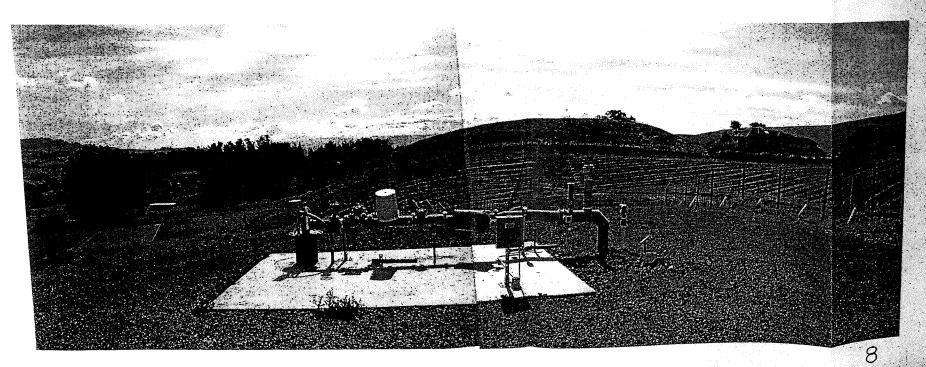
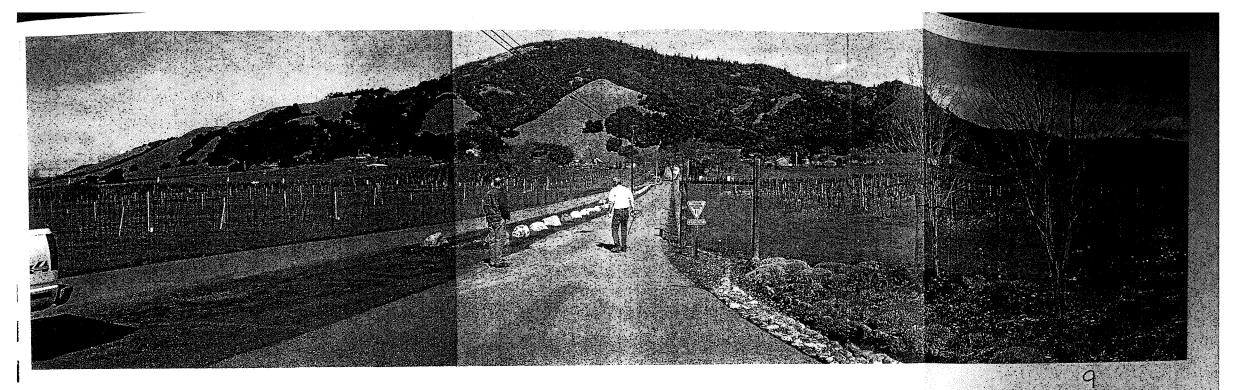
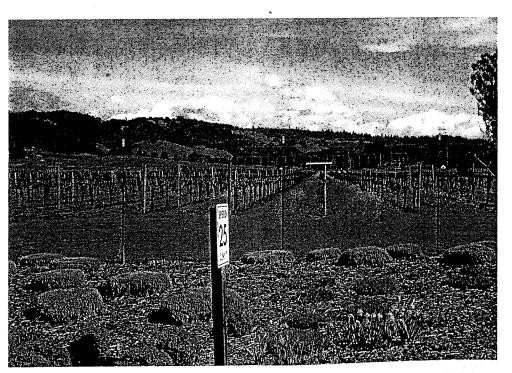
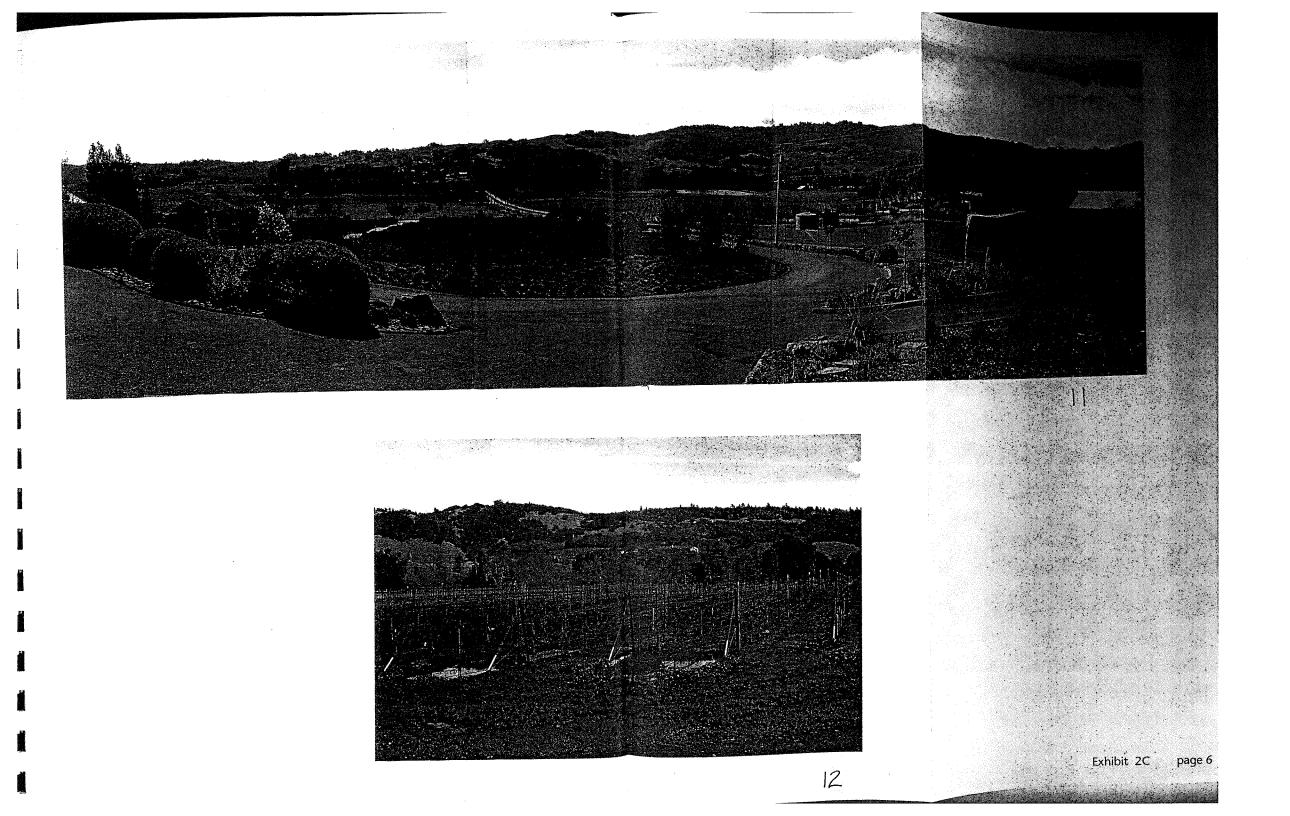


Exhibit 2C

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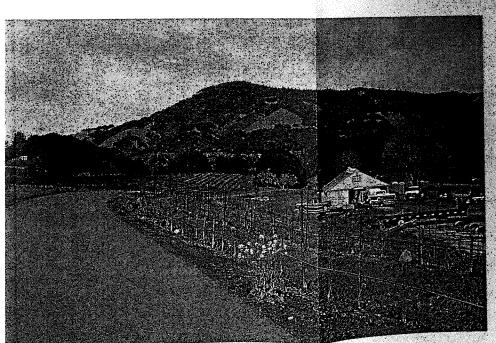












5 Exhi

Exhibit 2C

page 7









13





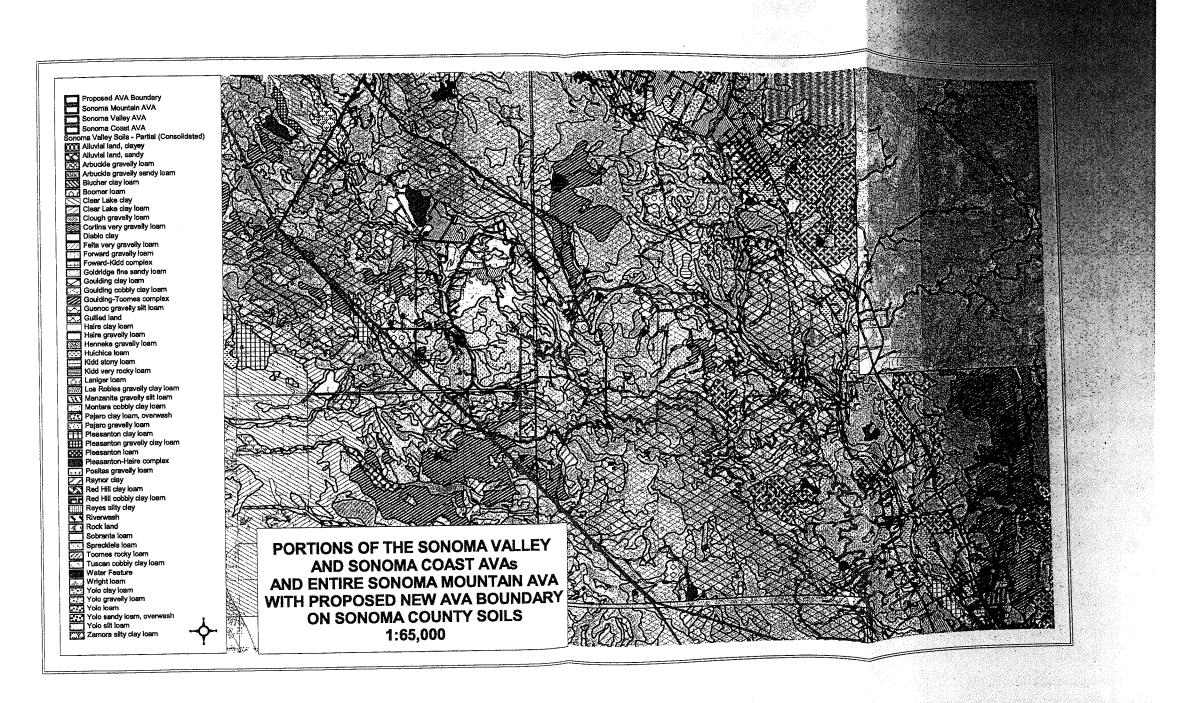
19B

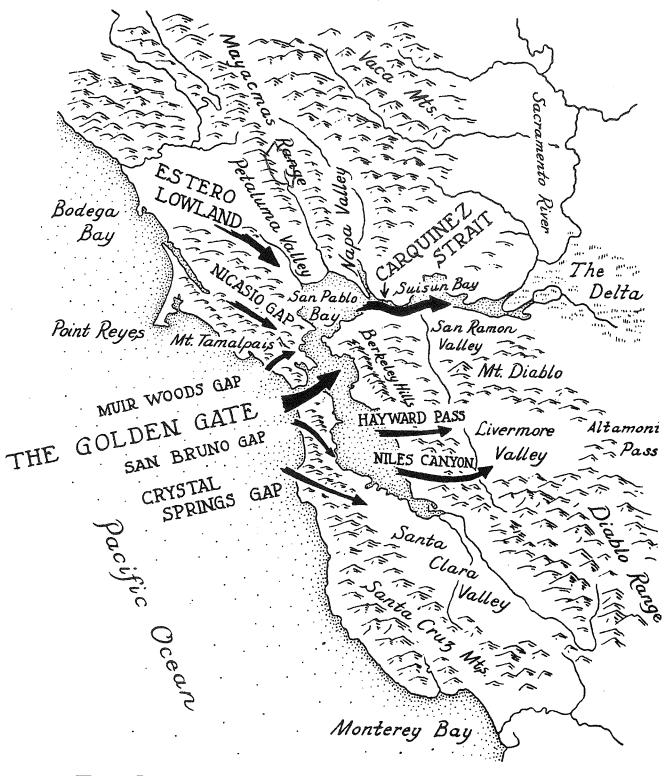




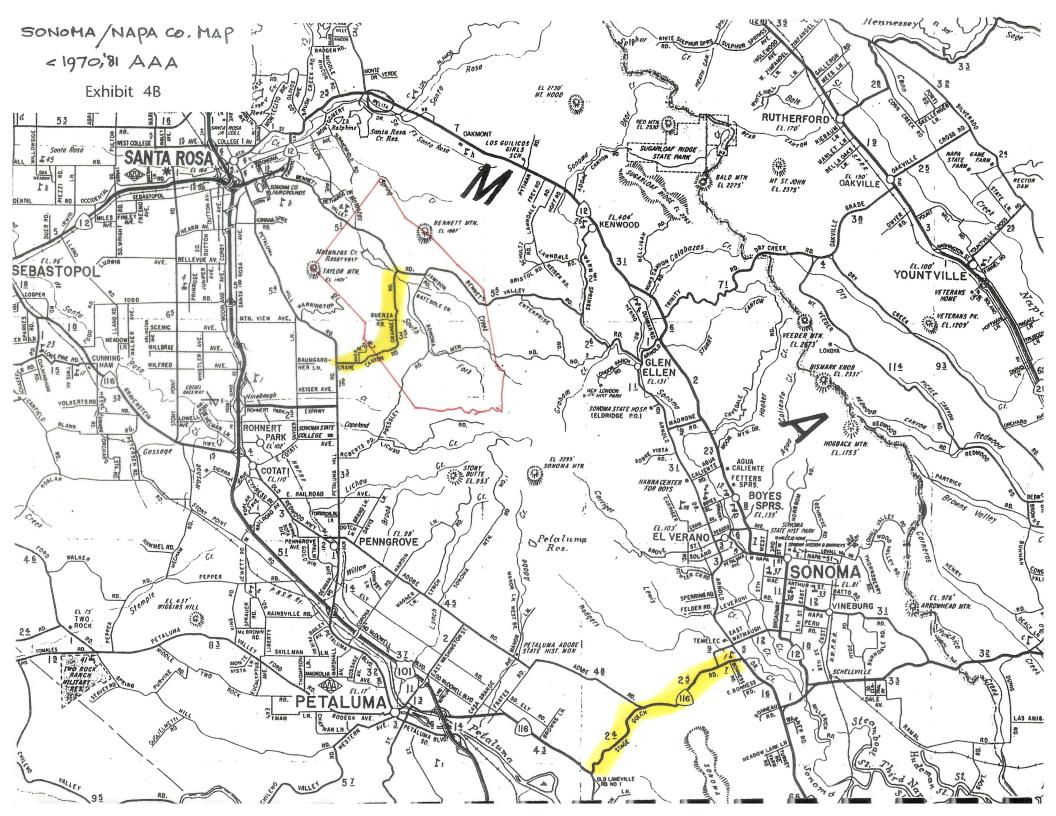
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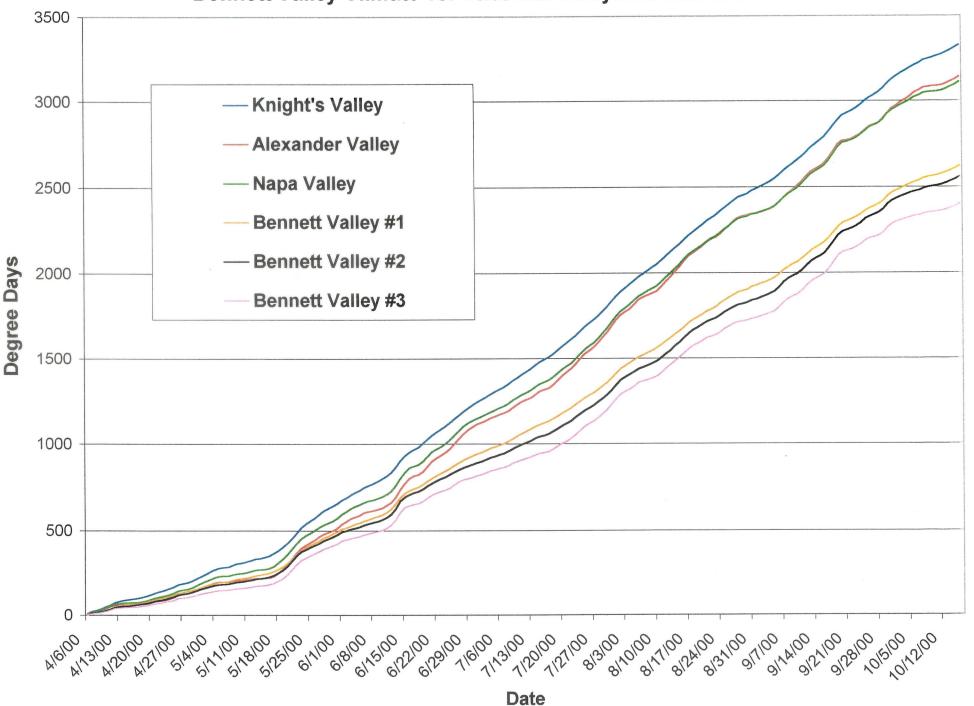




FOG GAPS AND BARRIERS



Bennett Valley Climate vs. Cabernet Vineyards Elsewhere



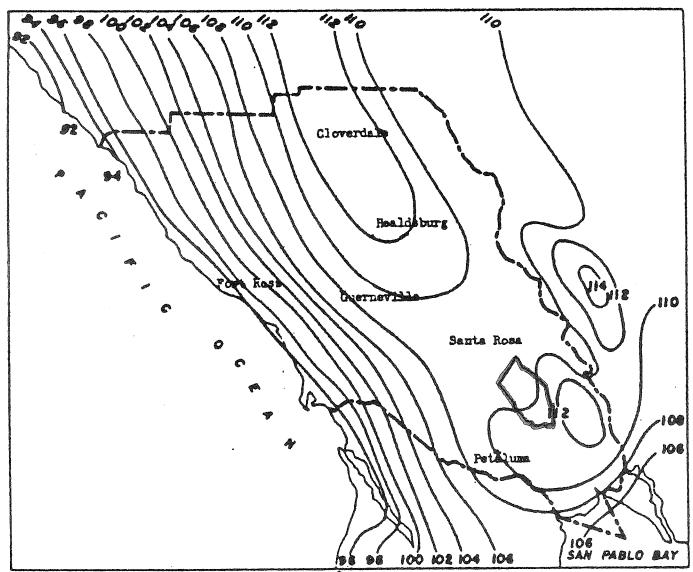
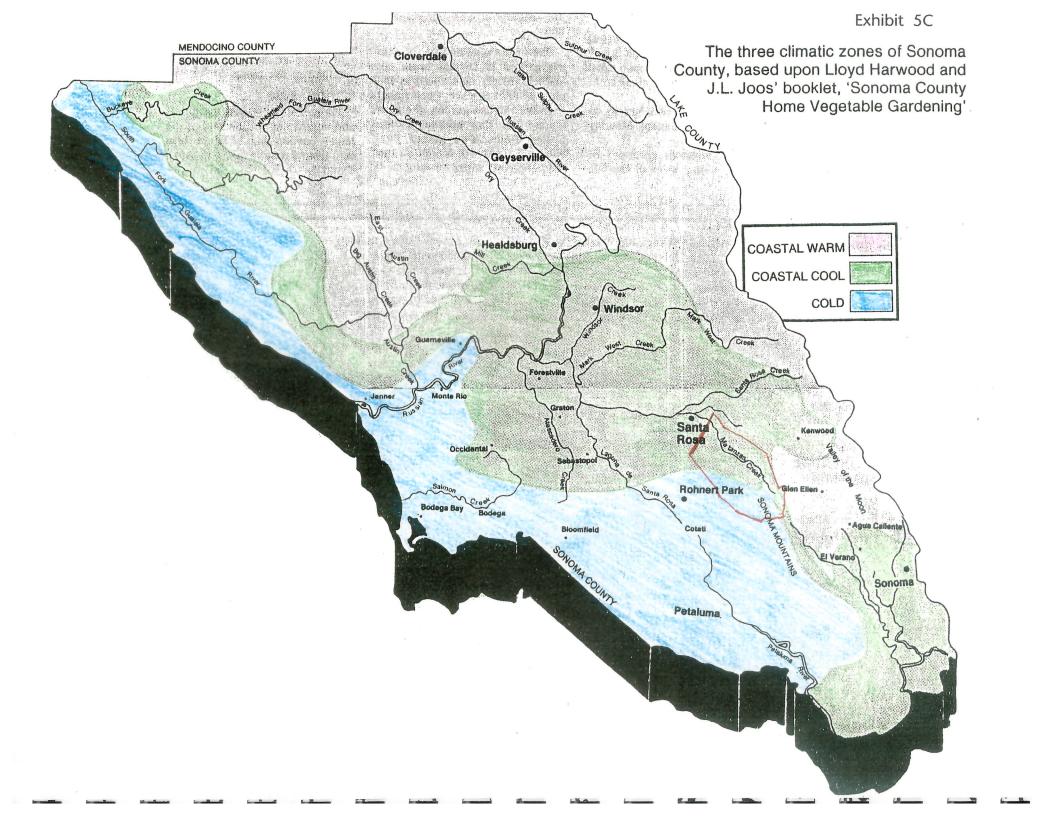
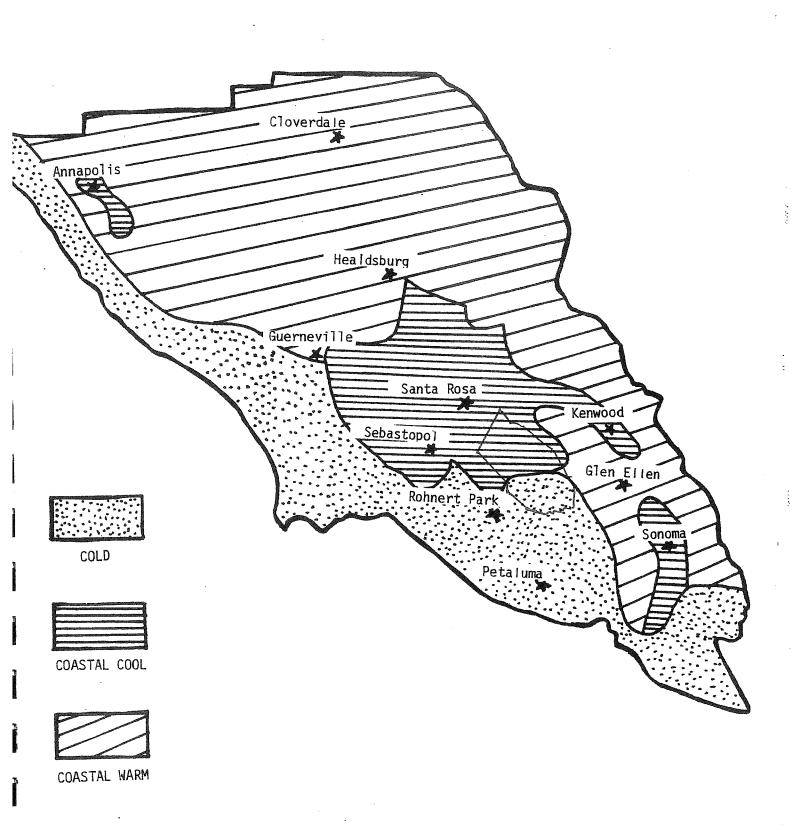
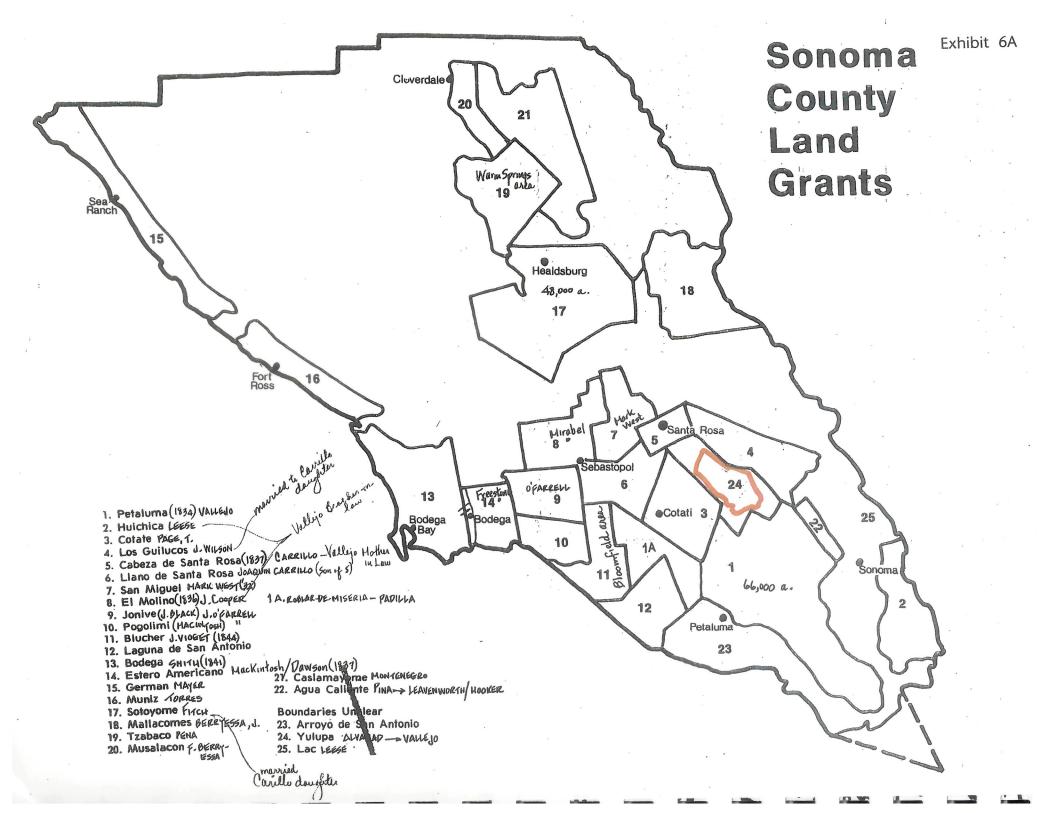


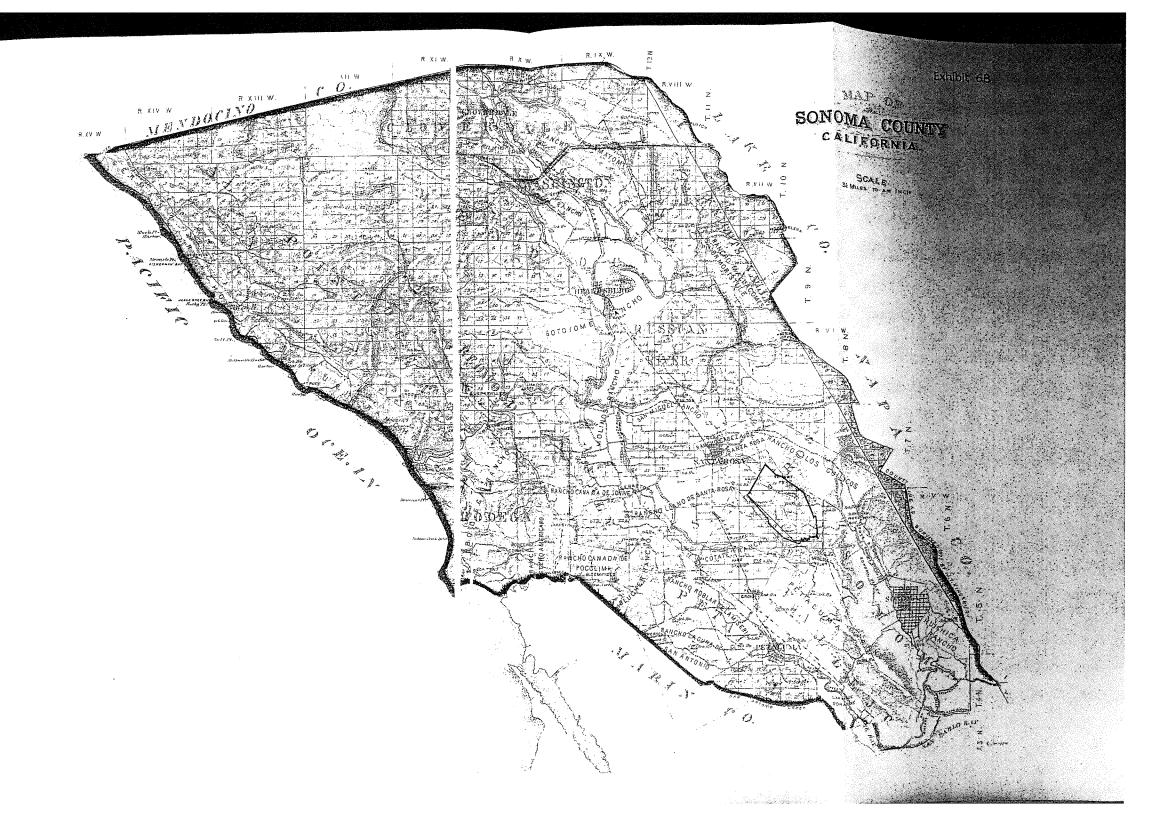
Figure 8. Highest Observed Temperature (CF).



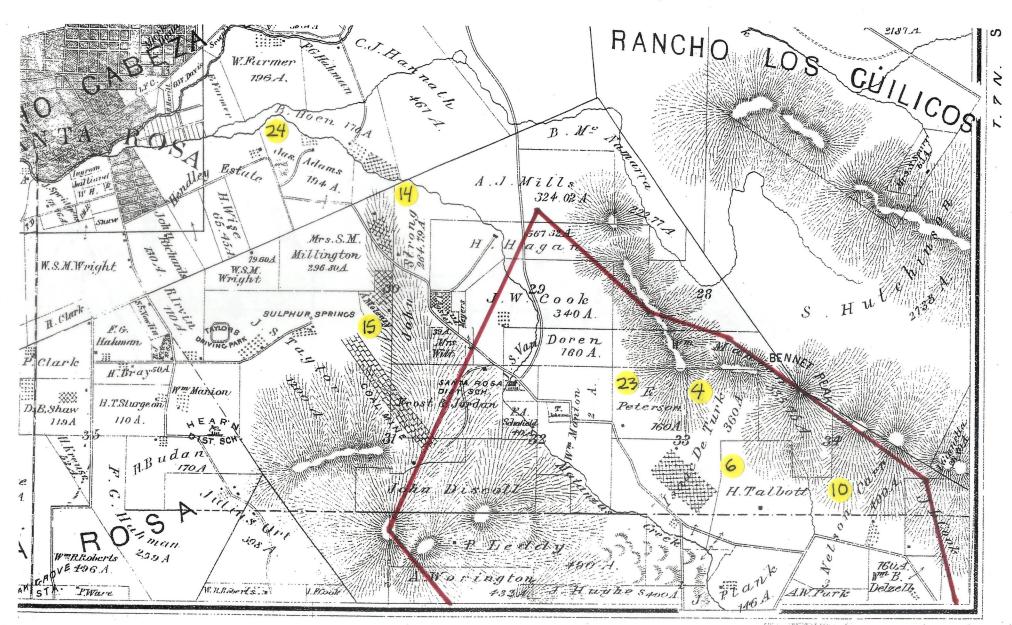
SONOMA COUNTY CLIMATIC ZONES



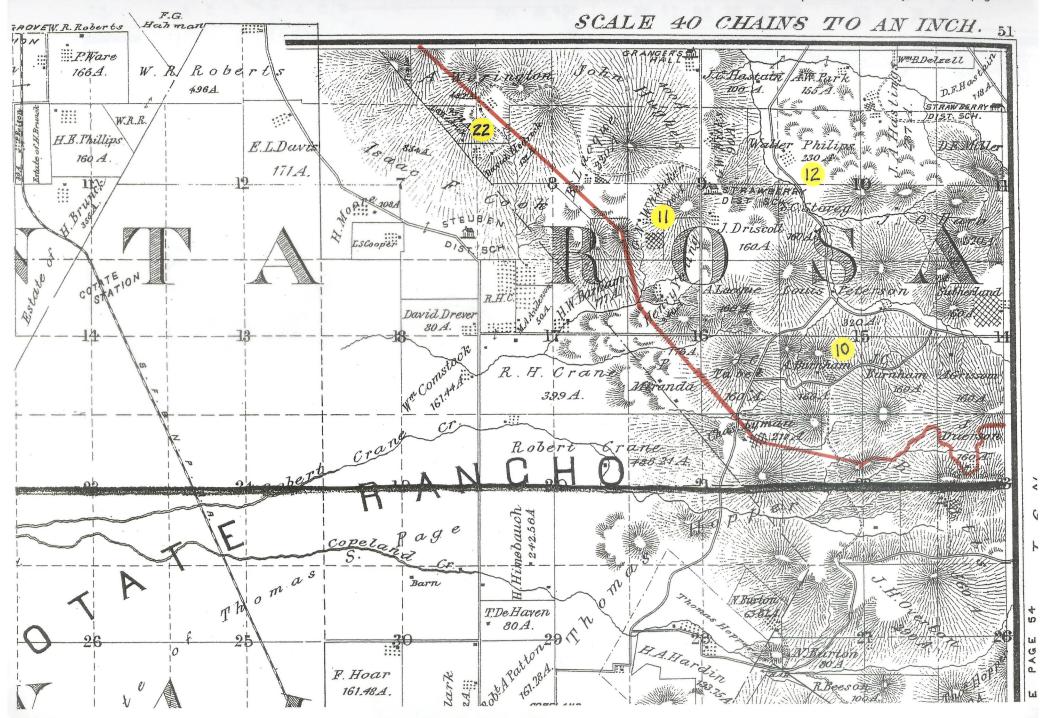


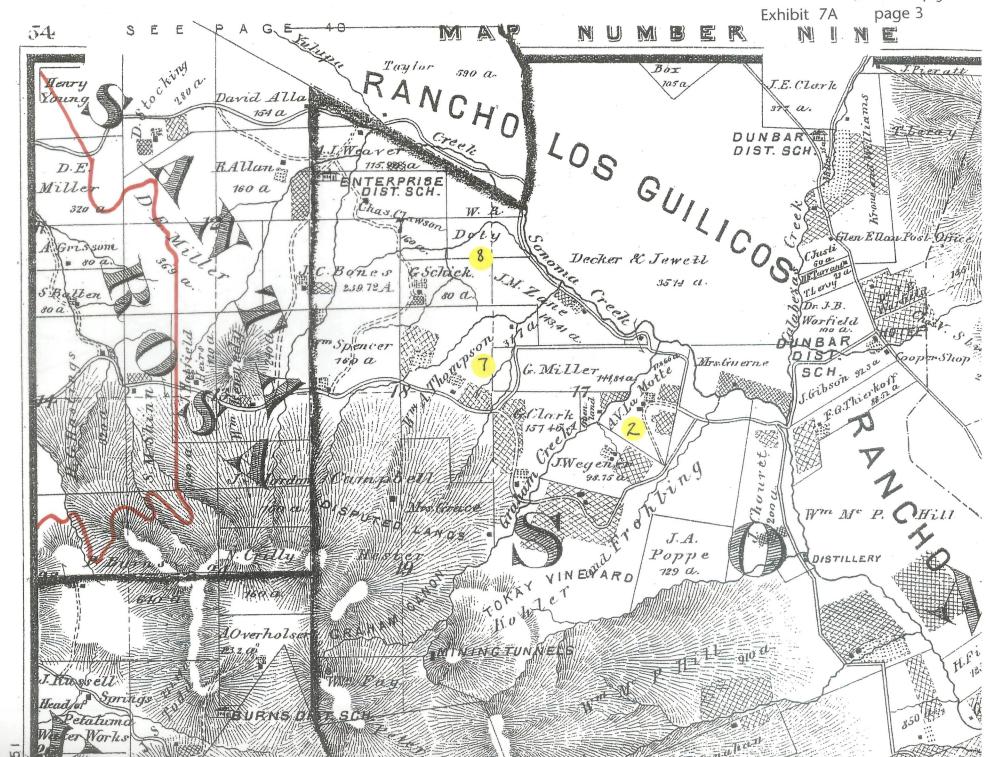






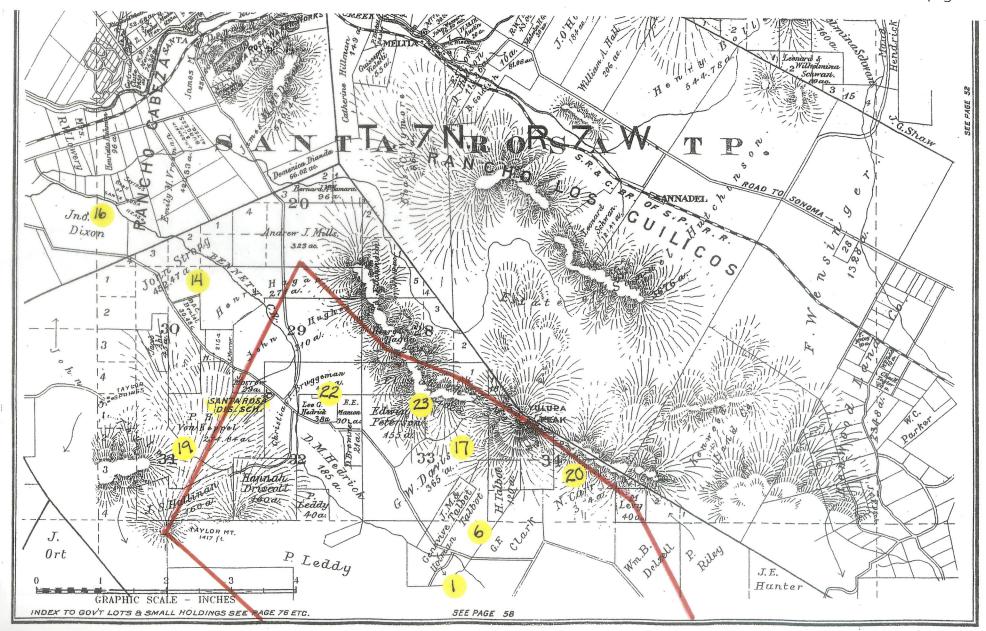
A. VII W.



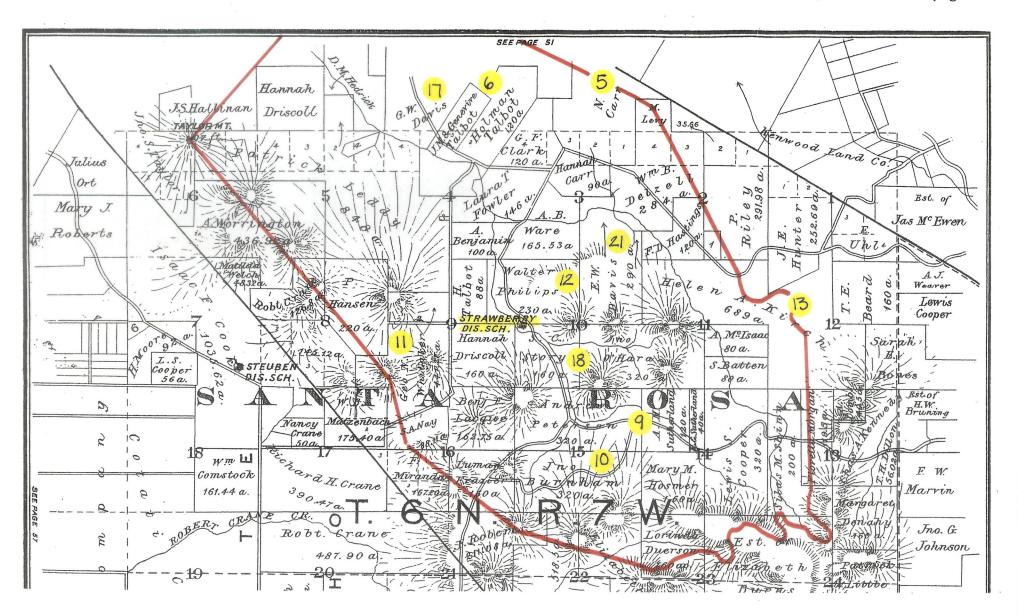


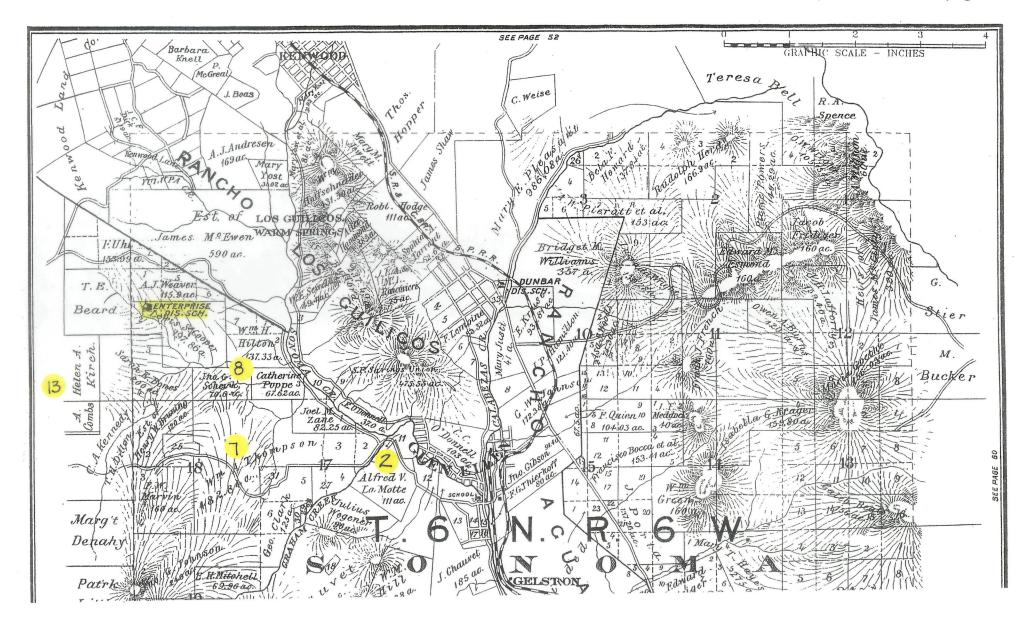
Illustrated Atlas of Sonoma County, 1897

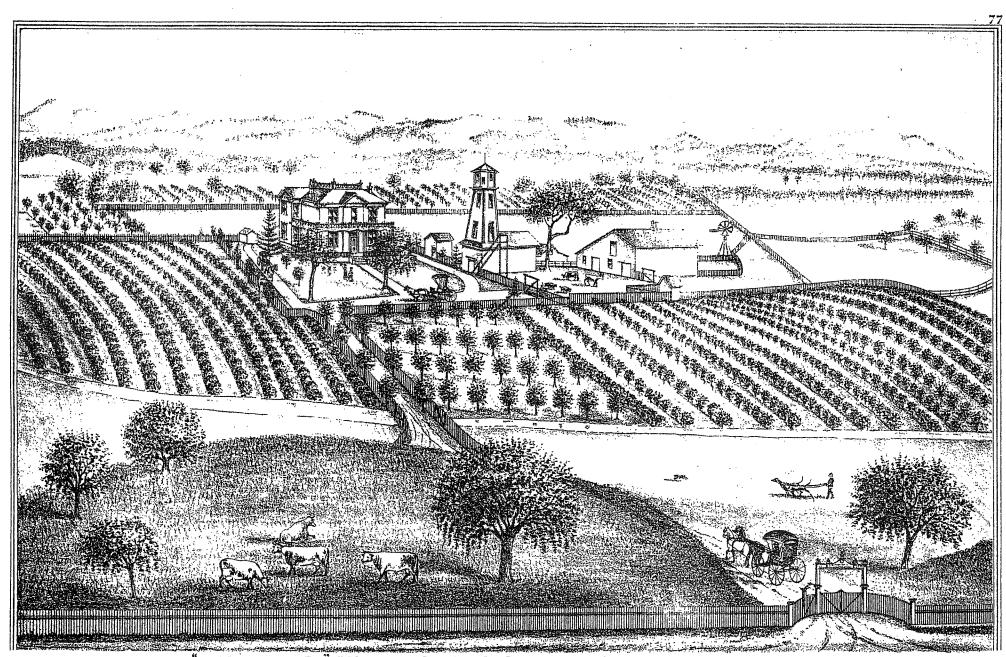
page 51



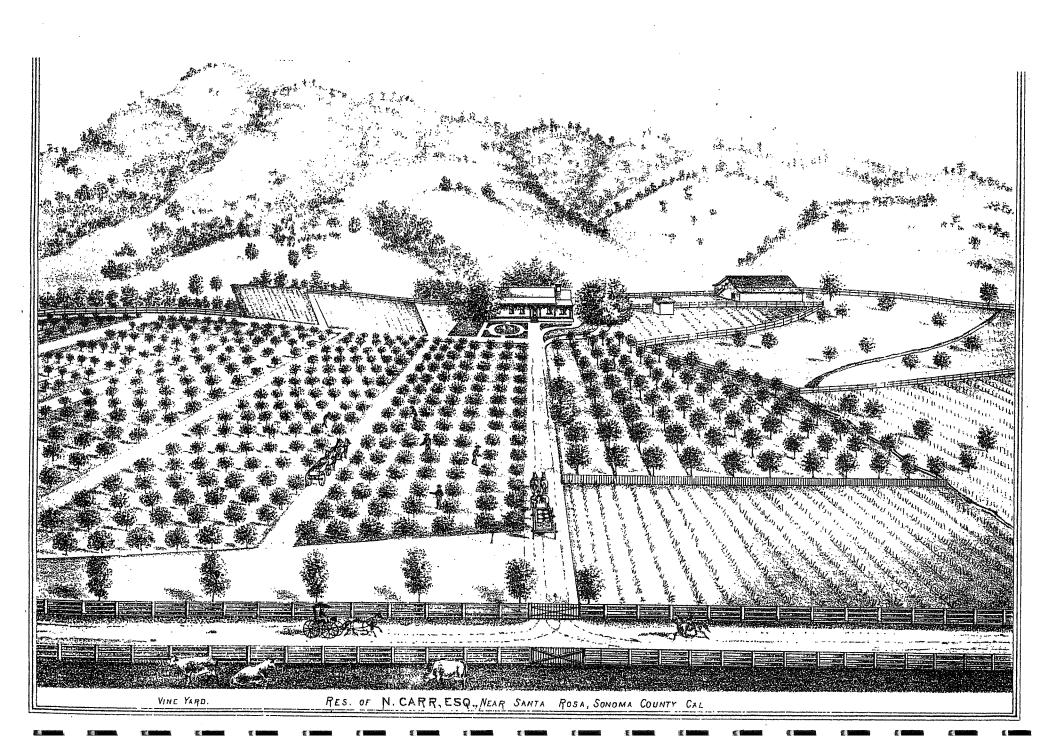
page 58

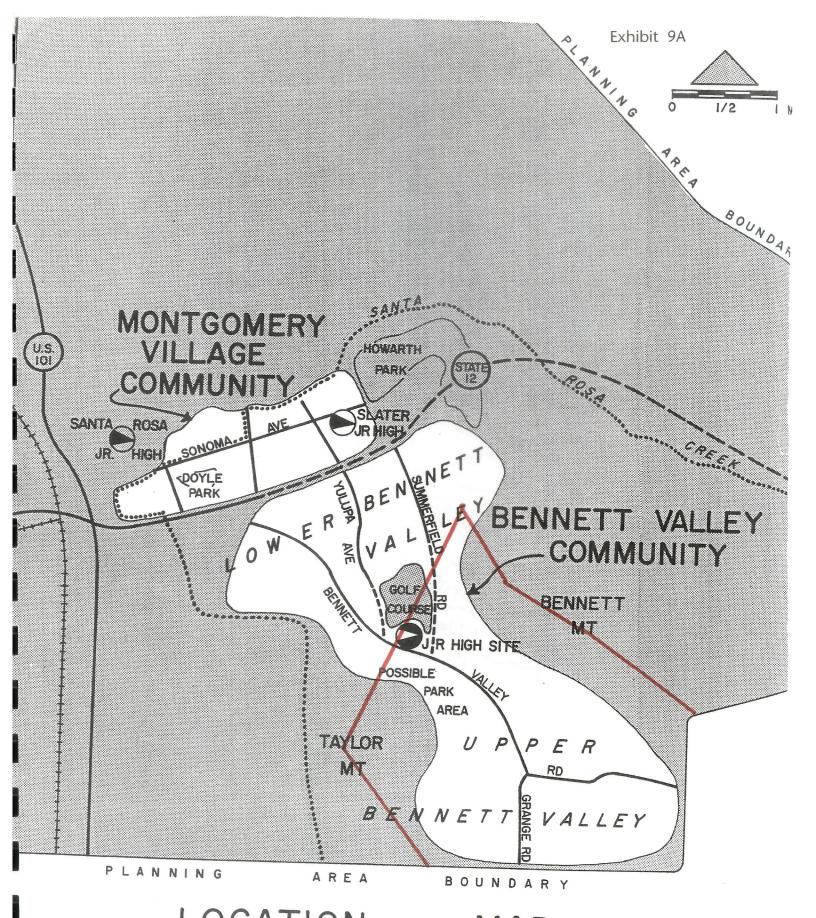






"BROOK HILL FARM", RES. OF JAMES ADAMS, SANTA ROSA, SONOMA COUNTY, CALIFORNIA.





LOCATION MAP

BENNETT VALLEY JUNIOR HIGH SCHOOL STUDY

SANTA ROSA PLANNING DEPARTMENT MAY 1970

...... INDICATES SLATER SERVICE AREA BOUNDARY



