Sonoma-Cutrer Vineyards, Inc.

June 24, 1983

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

Re: Chalk Hill proposed viticultural area

Dear Mr. Breen:

We have reason to believe that the southwestern boundary of the Chalk Hill viticultural area should be redefined. We are in the process of preparing a letter containing evidence that supports our contention, and we will send that letter to you very soon.

Very truly yours,

Sara Schorske

Sara Schorske
Administrative Assistant

4401 Slusser Road Windsor, California 95492 (707) 528-1177

Sonoma-Cutrer Vineyards, Inc.

July 20, 1983

Mr. Mike Breen
FAA, Wine and Beer Branch
Bureau of Alcohol, Tobacco & Firearms
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20226

Re: Chalk Hill proposed viticultural area

Dear Mr. Breen:

We propose to amend the southernmost boundary of the Chalk Hill Viticultural Area as drawn in the enclosed map showing the western half of the area (the boundary in accordance with the current amended petition is outlined in black and our suggested change in red). I also enclose a narrative description of the boundary change. The area proposed to be added conforms in every respect to the climatic and physical characteristics described in the petition. I have discussed our amendment with petitioners involved in the original and amended petitions and have their full support for the change.

I would like to proceed in a manner that would be mutually beneficial to all of the growers and producers involved. If a letter supporting our proposed change, signed by all of the eight participants in the petition as amended on March 28, 1983 would be sufficient to enable you to amend the boundary now without delaying the final publication date, I will send you such a letter immediately. If, however, the procedure required would significantly delay the publication date, we will apply for an amendment to the boundary after the Viticultural Area has been formally approved.

Please advise me how best to proceed. You may call me collect at (707) 528-1181. I would appreciate your response as soon as possible, especially if there is a chance of approving this small change without postponing the approval of the Viticultural Area. In any case, I would like to discuss the matter with you soon.

Very truly yours,

Sara Schorske

Sara Schorske
Administrative Assistant

Encl.

4401 Slusser Road Windsor, California 95492 (707) 528-1177

Narrative Description of Boundary of the
Chalk Hill Viticultural Area

Same as described in Enclosure #1 to the Amended Petition dated March 28, 1983 through item (3), then continue:

(4) Then easterly approximately 11,800 feet along the south line of Sections 14 and 13, T. 8 N., R. 9 W. and Section 18, T. 8 N., R. 8 W., to the point of intersection with Redwood Highway;

(5) Then southeasterly along Redwood Highway past the intersection with Faught Road to an unnamed road that intersects Redwood Highway at approximately a right angle near the west line of Section 28, T. 8 N., R. 8 W. and goes off to the northeast;

(6) Then northeast along the unnamed road to its intersection with the Pacific Gas and Electric Power Line;

(7) Then northwest along the Power Line to its intersection with the south line of Section 17;

(8) Then easterly along the south line of Sections 17, 16 and 15, T. 8 N., R. 8. W. to the point of intersection with Mark West Road on the "Mark West Quadrangle Map";

Then continue with item 5 through the end of the narrative enclosed with the amended petition dated March 28, 1983.

BALVERNE
WINERY & VINEYARDS

July 9, 1982

Chief, Regulations and Procedures Division
Office of the Director
Bureau of Alcohol, Tobacco and Firearms
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20226

Ref: Proposec Chalk Hill Viticultural Area

Dear Sir:

The purpose of this letter is to comment on the proposed rule making by the Bureau of Alcohol, Tobacco and Firearms in connection with the proposed Chalk Hill Viticultural Area, as published in the Federal Register/Vol. 47, No. 92/Wednesday, May 12, 1982. The undersigned is one of the original proponents for establishing Chalk Hill as a delimited viticultural area.

Name. It is felt that ATF's reservations regarding the use of the county name, "Sonoma", in the proposed appellation "Sonoma Chalk Hill" is well-founded, since the words "Sonoma County" can be used elsewhere on a wine label to indicate the proposed Area is in Sonoma County. The respondent concurs with ATF and recommends use of the name, "Chalk Hill".

Change of Boundaries. Since the original petition dated July 29, 1981 was filed and following the publication of ATF's notice of proposed rule making, other members of the industry with vineyards immediately adjacent to the area set forth in the original proposal have requested that the "Chalk Hill" area be expanded to include their vineyards. The proposed expansion would increase the grape acreage in the "Chalk Hill" area from slightlyin excess of 1,000 acres to approximately 1,400 acres. The soils and climate in the area are identical to soils and climate in the original proposed area. Elevations in the area proposed to be added are generally slightly lower than elevations in the original boundaries, with over 90% rather than 95% of the land in the proposed area ranging from 200 feet to 1,330 feet. The proposed expanded Chalk Hill Viticultural Area would encompass approximately 32 square miles as opposed to the approximately 27 square miles contained in the original proposal.

Please note also that on the enclosed Amended Map, dated June 21, 1982, the west to northwest boundary has been moved north-westerly to follow a drainage channel. The purpose of this is to eliminate the original proposed boundary which inadvertantly dissected two vineyards.

10810 Hillview Road, Post Office Box 70, Windsor (Sonoma County), California 95492 • Telephone (707) 433-6913

There are four wineries located in the proposed expanded "Chalk Hill Viticultural Area".

The respondent recommends that ATF act favorably upon the proposal to expand the boundaries of the Chalk Hill Viticultural Area as originally proposed.

The following exhibits are enclosed herewith:

1. Exhibit "A". Legal description of the Chalk Hill Viticultural Area, as originally proposed.

2. Exhibit "B". Legal description of the Chalk Hill Viticultural Area, as amended (dated June 30, 1982).

3. Exhibit "C". Amended map showing the proposed expanded Chalk Hill Viticultural Area (dated June 21, 1982).

4. Exhibit "D". Amended map showing the location of the proposed Viticultural Area in Sonoma County (dated June 21, 1982).

Viticultural Area Boundaries. ATF has noted that the proposed boundary lines of the Chalk Hill Viticultural Area---overlap into the proposed Alexander Valley Viticultural Area by a triangular strip of land, 550 feet at its widest point. Respondent believes that ATF is referring to a small drainage area from which water is impounded by a dam, creating a reservoir. If this iscorrect, there are no vineyards planted in the overlap area and the steepness of the terrain would preclude any future plantings in the area. It is suggested that ATF may wish to determine that such overlap is not sufficiently material to warrant an adjustment in the boundary. If, however, ATF determines this overlap should not occur, the undersigned recommends that ATF include in its Executive Order establishing the Chalk Hill Viticultural Area a condition that such overlap be eliminated prior to use of the name Chalk Hill on wine labels. In this connection, the undersigned represents that should ATF include such a condition in its Executive Order, he will cause a revised boundary map and legal description to be prepared by the surveyors (Hogan, Schoch & Associates) and filed with ATF prior to recording with the Recorder, County of Sonoma, California.

Very truly yours,

B. J. Bird
President

BJB:ss

encl.

Sonoma Vineyards

July 1, 1982

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

Subject: Notice No. 411 - Comment to Chalk Hill Viticultural Area Notice No. 411, Federal Register/Vol. 47, No. 92/Wednesday, May 12, 1982/Proposed Rules

Dear Sir:

Sonoma Vineyards respectfully requests that the boundaries for the Chalk Hill Viticultural Area as proposed in the above-referenced Notice be amended and expanded as detailed herein below.

Section 4.25a(e)(2)(iv) The Specific Boundaries of the Viticultural Area. Please refer to EXHIBIT A attached hereto and incorporated herein by reference. This exhibit describes boundaries for the proposed Chalk Hill Viticultural Area which enclose some land which did not appear in the original petition. The described boundaries can be identified on U.S. Geological Survey maps (7.5 Minute Series) of the Healdsburg Quadrangle, California and the Mark West Springs Quadrangle, California.

Section 4.25a(e)(2)(v) Maps. A copy of the appropriate U.S.C.G. maps is attached hereto as EXHIBIT B and incorporated herein by reference. The expanded boundaries proposed by this comment are shown on said Exhibit. Also attached hereto as EXHIBIT C and incorporated herein by reference is a map of Sonoma County which shows the location within said county of the boundaries of EXHIBIT B.

The additional land should be included in the Chalk Hill Viticultural Area for the following reasons:

Section 4.25a(e)(2)(i) Local and/or National Knowledge of the Viticultural Area. Reference is made to the discussion of factors relevant to this section which

Old Redwood Highway, Windsor, Sonoma County, California 95492 (707) 433-6511

appears in the "July 29, 1981 Petition to Establish the Sonoma Chalk Hill Viticultural Area" (hereafter referred to as "Petition"). The information provided on the petition which pertains to Local and/or Knowledge of the Viticultural Area is applicable to the area which this Comment seeks to add to the Chalk Hill Viticultural Area as well as to the original proposed area. In particular, attention should be drawn to the fact that the general area is known locally as Chalk Hill.

The proposed additional area would encompass Sonoma Vineyards Winery. Sonoma Vineyards, through its national distribution of wines identifying Chalk Hill, has itself contributed to national recognition of Chalk Hill as a viticultural area. (See also the discussion under Section 4.25a(e)(ii).)

Section 4.25a(e)(ii) Historical or Current Evidence. Reference is made to EXHIBIT A of the Petition. The historical discussion therein is applicable to the area which this comment seeks to add as well as to the original proposed area.

As discussed above and detailed in CHART ONE (below), Sonoma Vineyards has had wine in national distribution identifying Chalk Hill since 1978.

CHART ONE

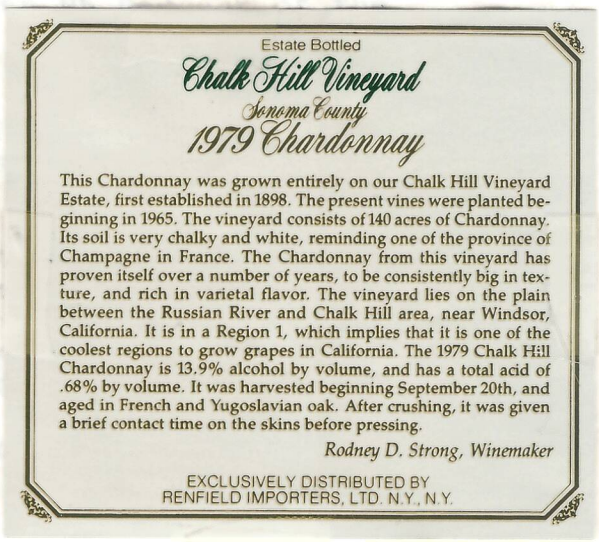
Chalk Hill Vineyard, Chardonnay, Sonoma County, Estate Bottled

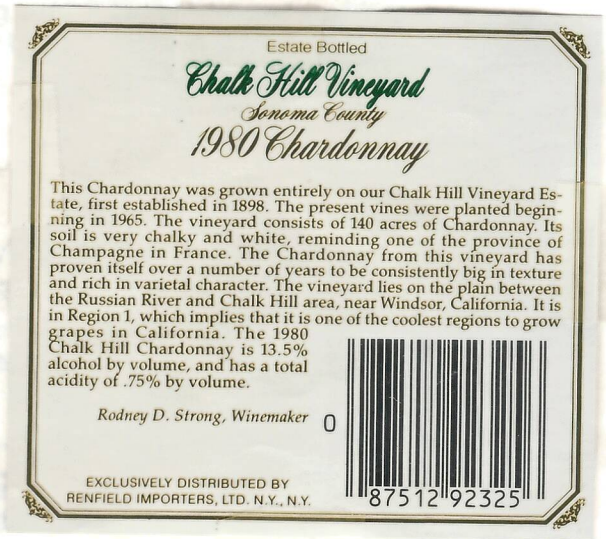
1977 Vintage	Produced and sold: 69,576 bottles (5,798 cases)
1978 Vintage	Produced and sold: 100,536 bottles (8,378 cases)
1979 Vintage	Produced and sold: 104,532 bottles (8,711 cases)
1980 Vintage	Produced and now selling: 255,000 bottles (21,250 cases)

The 1980 vintage Chalk Hill Vineyard Chardonnay won a gold medal at the 1982 Orange County Fair Commercial Wine Competition.

The 1980 vintage Chalk Hill Vineyard Chardonnay won a bronze medal at the 1981 Sonoma County Harvest Fair competition.

The following is an example of the labeling identifying Chalk Hill which has been used by Sonoma Vineyards.





Section 4.25a(e)(2)(iii) Geographical Features. Reference is made to the discussion of factors relevant to this section that appears in the Petition. The information provided on the Petition which pertains to geographical features is applicable to the area which this comment seeks to add to the Chalk Hill Viticultural Area as well as to the original proposed area. In particular the soil in the added area is also characteristically "white" soil, and marine-influenced climatic conditions also exist in the added area causing vineyards in the added area to be "September" Vineyards (as defined in the Petition).

As the Petition also discusses, over 95 percent of the vineyard plantings in the area proposed by that Petition are at elevations from 200 feet to approximately 1330 feet. The addition of area requested by this comment would not substantially change the percentage of vineyards with elevations of 200 feet or more.

Summary and Conclusion. The additional area proposed herein for inclusion in the Chalk Hill Viticulatural Area is essentially identical for grape growing purposes to the petitioned area and, therefore, should be included therein. Furthermore, Sonoma Vineyards Winery which would be encompassed by the addition of the area has itself contributed significantly to national recognition of Chalk Hill as a viticultural area.

It is our present understanding that all of the original petitioners have no objection to the boundary changes proposed herein and, in fact, support our request for said change.

SONOMA VINEYARDS

By: _____
G. M. Pasterick
Executive Vice President
Wine Division

_____
Rodney D. Strong
Founder and Chairman
Wine Division

Lying within Sonoma County, California, about 8 miles North of Santa Rosa and Easterly of U. S. Highway 101, more particularly described as follows:

BEGINNING at the intersection of the County Road known as "Arata Lane" with Old Highway 101 (a.k.a. "Old Redwood Highway"), said point lying 2100 feet, more or less, West of the Southeast corner of Section 2, T9N, R9W, MDM; thence Easterly along the Southerly line of said Section 2, and Section 1, 4,800 feet, more or less to the intersection of Arata Lane and Brooks Road; thence leaving said intersection South along the centerline of Brooks Road 5,300 feet, more or less to a point on the Southerly line of Section 12 and the centerline of Brooks Road; thence in a Southeasterly direction 500 feet, more or less, along the centerline of the frontage road to the intersecting point of said frontage road and Old Redwood Highway; thence in a Northwesterly direction, 1,000 feet, more or less, along the centerline of Old Redwood Highway and passing under Highway 101 to its intersection with Windsor River Road; thence Westerly along Windsor River Road to the intersection of said road and Starr Road; thence along the centerline of Starr Road, Southerly 5,300 feet, more or less, to an intersection of Starr Road and the Southerly line of Section 14, T8N, R9W; thence in an Easterly direction 2,600 feet, more or less, along the Southerly line of Section 14 to Section corner 14, 13, 23, 24, T8N, R9W, which is near the intersection of Windsor Road and Wilson Lane; thence in an Easterly direction along the centerline of Wilson Lane and its extension, Easterly 10,800 feet, more or less, to the common Southerly corner of Section 18 & 17, T8N, R8W; thence continuing Easterly along the South line of said Section 17, 5,300 feet, more or less to its Southeast corner; thence along the East line of said Section Northerly 5280 feet, more or less to the common corner of Sections 17, 16, 8 and 9 of said T8N, R8W; thence continuing Northerly along the common line of Sections 8 and 9, 1150 feet, more or less to its intersection with said Leslie Road, an unimproved road; thence Easterly and Northeasterly following the centerline of said unimproved road about 1 and 1/8 miles through Section 9 of said T8N, R8W, MDM, and the road's Easterly projection to the common line between Sections 9 and 10 to a point with approximate California Coordinate System, Zone 2, Coordinates of N - 325,075: E - 1,788,100; thence leaving said section line in a straight line Southeasterly 6400 feet across Section 10 and into the Southwest 1/4 of Section 11 of the junction of a drainage (running North) with the major creek known as Mark West Creek; thence in a straight line Northeasterly 600 feet to a point in the center of Porter Creek Road (a.k.a. Mark West Road as the same road runs Southerly); said point lies 800 feet North of the South line of Section 11 and 950 feet East of the West line of said Section 11, T8N, R8W, MDM; thence Easterly, and Northeasterly about 1-1/2 miles following the centerline of said road through Sections 11 and 12, T8N, R8W, MDM, to its junction with "Franz Valley Road" (a.k.a. Tarwater Grade Road); thence Northeasterly, Northerly and Northwesterly following the center line of said Franz Valley Road through Section 12 and 1 of T8N, R8W; Section 6 of T8N, R7W, Sections 31 and 30 of T9N, R7W, and through "Mallacomes Rancho" a distance of about 4-1/2 miles to a major intersection with Franz Creek (this intersection bears from the Northeast corner of Section 25, T9N, R8W, approximately West 2030 feet and North 1150 feet of said section corner); thence leaving said Franz Valley Road and following the thread of the stream of said Franz Creek downstream about 2-3/4 miles to its intersection with the common line of Sections 21 and 22, T9N, R8W, MDM, approximately at California Coordinates,

Zone 2, N - 346,300: E - 1,788,075; thence South along said common section line 3650 feet, more or less, to the Southeast corner of said Section 21; thence West following along the South line of said Section 21, one mile, more or less, to the common Southerly corner of said Section 21 and Section 20; thence continuing West along the South line of Section 20 and its projection Westerly into the Sotoyome Rancho, a distance of about 4300 feet to an intersection with "Chalk Hill Road"; thence Southwesterly along said road 550 feet to a point; thence Northwesterly in a straight line which intersects the top of "Chalk Hill", as designated on said "Healdsburg" 7.5' Quadrangle Map and projecting in a straight line 2850 feet from said road to the center of the Russian River; thence Westerly and Northwesterly following the thread of stream of said river, the following courses: 1,400 feet, 1,00 feet, 1,000 feet, and 1,800 feet, more or less to a point on the West bank at the Northerly terminus of an unimproved road known as "Grant School Road", said point further identified as having California Coordinates, Zone 2 of N - 344,375: E - 1,771,380; thence leaving said river bank and following the center of said road through its various curvelinear path as depicted on said Healdsburg Quadrangle Map Southeasterly, Southerly and Southwesterly about one and 3/4 miles, more or less, to the intersection of said Grant School Road (a.k.a. McNear Road or Perinoli Road) with the previously referred to Pacific Gas and Electric major power line, delineated on said Healdsburg Quadrangle Map at approximately California System Coordinates, Zone 2 of N - 339,350: E - 1,766,480; thence leaving said point and in a straight line Southwesterly, 2,700 feet to a point in the flow line of a drainage; thence meandering in a Southwesterly direction down the flow line of said drainage through the center of a reservoir as shown on said map; thence continuing in a meandering Southwesterly direction following the flow line of said drainage, passing near the Northeasterly end of Reiman Road about 5,000 feet, more or less to the intersection of said flow line with the intersection of Highway 101; thence continuing along said flow line to its intersection with the Northwestern Pacific Railroad; thence West along the range line between said T8N and T9N in a straight line 1,000 feet; thence Southerly in a straight line 2,000 feet; thence East in a straight line 1,250 feet to the centerline of Eastside Road; thence in a Northwesterly direction 600 feet, more or less, along the center line of Eastside Road to its intersection with Old Redwood Highway and following the centerline of Old Redwood Highway in a Southeasterly direction 6,500 feet, more or less, to the centerline intersection of said Old Redwood Highway and Arata Lane, the point of beginning; containing approximately 32 square miles.

Fairleigh Dickinson University
Pub Associates
Teaneck-Hackensack Campus
Teaneck-New Jersey 07666
201-836-6300

June 18, 1982

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

Dear Sir or Madam:

I would like to applaud the efforts of the ATF for your proposed creation of the Chalk Hill viticultural area. The American wine industry, so long relegated to a "second-class citizen" status in its own country by certain consumers with the mistaken idea that anything foreign is better - deserves the recognition that other nations bestow upon their geographic areas renowned for unique products. At a time when our country is losing so much of its own identity in every area of productivity, I feel it is necessary to preserve, protect and encourage those individuals engaged in producing a fine American product.

My only suggestion would be to listen to the people from that area, consult with them, so that if the Chalk Hill area is established, it is in accord with those who've worked and lived there longest. Too often in the past, government agencies have made haphazard decisions without regard to local considerations. If there is anything worse than that lost identity in productivity that I mentioned above, it would have to be the U.S. Government's repeated embarrassment due to ill-conceived actions by its various agencies.

At any rate, I wish you and the country very good luck in what seems to be a positive effort. I like the name too.

Yours truly,

Walt Nygard

Walt Nygard
Manager
F.D.U. Pub

WN/pj