MARIANO MECONI, FOUNDER
ESTABLISHED 1921

(1)

St. Julian Wine Company

PRODUCERS OF FINE WINES AND CHAMPAGNES

MAIN OFFICE — 716 S. KALAMAZOO ST., PAW PAW, MICH. 49079 PHONE AREA CODE 616 657-5568

January 20, 1983

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

Attention: Notice No. 441

Dear Sir:

I am writing today to reaffirm my belief in the numerous advantages we in the local wine community as well as the consumers of our products will enjoy as a result of the approval of the "Lake Michigan Shore" appellation of origin.

The area encompassed by this petition has for decades been synonymous with winemaking on and around Lake Michigan. No other region bordering any of the waters of this lake is or has been significantly involved in the commerce of winemaking save the relatively new and recently approved "Leelanau" appellation area of the northern lower peninsula of Michigan. The compilation of the petition includes each relevant colloquial name for the area described and, in my opinion, the best possible of those was chosen to now become the formal name. Those of us in the local wine industry need a name for our unique grape growing region that is descriptive and attractive from a marketing standpoint; a name that looks good on the label and, just as importantly, will immediately convey the geographic identity of the wine behind the label. Given this, our efforts will serve to diminish consumer confusion and help any potential consumers to more readily ascertain the origin of the wine they contemplate purchasing. Using the guide lines prescribed by BATF, all of the other eligible names ("Fruitbelt", "Southwestern Michigan" and "Western Counties") certainly do no more than, if as much as, the proposed name to elucidate the region addressed for the consumer.

Careful consideration was given to the inclusion of a portion of Northern Indiana in the petition. This was not done for several reasons. Commercial winemaking does not presently exist in that area, and because of the unsuccessful attempts which have been made, future prospects look unpromising. Boundaries within Indiana, were it included, would be very difficult to define as they have never been truly tested, little conclusive data exists to assist in determining borders and the inconsistency of what Indiana-grown crop does exist as compared to that of "Lake Michigan Shore" area makes justification of this expanded area less conclusively evident. Conversely, the submitted boundaries of the "Lake Michigan Shore" area have stood the test of time and evolved their present location through repeated trials. Significant

scientific data exists to support the practical evidence of what exists here. Much of that was included or addressed in the petition.

"Lake Michigan Shore" is as fair and descriptive a name for this district viticultural area as any. I strongly urge you to consider the adoption of the petition as submitted and thereby provide us with an identity that will carry our industry through its second century of operation.

Respectfully,

Charles W. Catherman, Jr.
Vice President, Winemaker

gb

Fenn Valley®

VINEYARDS

5

Chief, Regulations and Procedures Division
Bureau Alcohol, Tobacco, and Firearms
P.O. Box 385
Washington, D.C. 20044-0385
Attn:Notice No. 441

Jan. 17, 1983

Dear Sirs;

I wish to comment on the proposed "Lake Michigan Shore Viticultural Area". I am the winemaker and the viticulturalist for Fenn Valley Vineyards located in Fennville , Michigan. I have had quite a bit of experience with the grapes and wines of the proposed area (the area includes our own vineyards and those of most of our growers) as well as the same from other areas of Michigan and the East.

Fenn Valley Vineyards was the firm that petitioned for the formation of the Fennville Viticultural Area several years ago. At that time we were able to establish the uniqueness of the Fennville area with regard to grape vine survival and wine quality. At this time I want to address myself to the similarities of the entire Lake Michigan Shore area when it is compared on a large scale with other areas. While I do feel that the Fennville Area is unique, I also feel that it can be included in this much larger area because of some of the similarities that we share.

I feel that the northern boundary is located properly since, by the same arguement that I used when establishing the Fennville Area, the area north of the Kalamazoo River has neither the topography nor the proper soil type to support viticulture. This is best illustrated by the large numbers of Truck and Blueberry farms located north of here. (Any farmer will tell you that the soils that best support the above mentioned crops and those that will support Grapes are quite different indeed!) The next fruit (and grape) area is about fifty (50) miles north - and the climate there is quite different from proposed Lake Michigan Shore Viticultural Area.

The eastern boundary very closely follows the isotherms which define the "lake effect" which makes viticulture possible in this northern climate. Lake Michigan modifies the climate, particularly the winter minimum temperatures, which allows the grape vines to survive. Once outside the "lake effect" area, viticulture proves to be difficult at best. For furthur discussion about this topic see Mike Thomas' and Doug Welsch's comments during the Fennville Viticultural Area hearing.

RURAL ROUTE 4, 6130 122nd AVENUE • FENNVILLE, MICHIGAN 49408 • TELEPHONE (616) 561-2396

By the same arguement, the southern boundary is properly located as it too approximates the "lake effect". Once one nears the lower apex of Lake Michigan, the climate reverts from Marine to Continental, which makes Viticulture very difficult and definitely alters the varieties of grapes that can be grown.

With regard to wine quality, while there will be some variation within the district, the wines of this entire area will **definitely** be similar in taste and character, especially when they are compared to wines from other areas of the world. I have made wines from grapes grown all throughout the proposed region and I can safely say that they are indeed unique. In fact, they are quite different from the wines grown on the Leelanau Penninsula, and that is a relatively close grape producing area. In what way are the wines of Southwestern Michigan different? Our wines have more acid and fruit than those of Ohio, Pennsylvania, and New York, but not nearly as much acid as those grown north of here near Traverse City. The taste can best be described as somewhat thin with intense fruit - something which is not found in many areas of the world except maybe northern Germany. Perhaps the best example that I can think of is with wines made from the Vignoles grape. Nowhere else have I tasted Vignoles wines with such a pineapple-like taste as I have found here in this area. Vignoles made from grapes grown north of here are delicate and Riesling-like, while outstate Vignoles have a delicate Chardonnay-like taste. But not those of the Lake Michigan Shore Viticultural Area, all of ours are strong and unmistakably unique!

One should also look at the varieties of grapes that are grown and which make up the backbone of the wines produced in an area. In the east, Seyval blanc is the dominant variety and Vidal blanc is not looked upon with much favor. In the proposed area, we find Seyval to be acceptible while the Vidal is our forte'. Going north, Vidal cannot be properly ripened and their mainstay is Vignoles (which is too powerful for extensive us in this area). The significance of this is twofold. 1) The varietal wines offered will be different in both variety and in taste, 2) blended wines reflect the varieties available in this region and consequently will be unique to this area.

As you can gather, I heartily support the concept of the Lake Michigan Shore Viticultural Area and look foreward to being a part of it. To summarize, while the wines of the Fennville Viticultural Area are unique unto themselves, they do share significant similarities with wines grown throughout the proposed area, especially when compared on a world wide basis.

Sincerely yours,

Doug Welsch, winemaker

(3)

TABOR HILL
VINEYARD & WINECELLAR

CHI COMPANY
RT. 2, BOX 720, MT. TABOR RD.
BUCHANAN, MICHIGAN 49107
(616) 422-1161

January 26, 1983

Chief of Regulations & Procedures
Division ATE
PO Box 385
Washington DC 20044-0385
RE: Notice No 441

Gentlemen:

We feel that the appelation Lake Michigan Shore Viticulture Area should receive your careful consideration and suggest that you take into consideration the following points:

1. The name gives the consumer the impression that the land in question is near the shore or close to Lake Michigan, when in fact that the extremes of this large area are 30-60 miles removed from the actual shoreline.

2. We question the validity of a statement that "the entire area receives the tempering "lake effect" of Lake Michigan", in that certain vinifera species cannot be successfully or commerically grown in this region.

3. That the argument for this region uses grape quantities grown, rather than varieties. We feel that the use of appelations was to help comsumers compare wine wines from different regions. We feel that the use of the concord variety as a basis for our regionsal designation would only serve to confuse consumers, when they compare wines of the Napa Valley to those of Lake Michigan Shore.

4. That geographically this area should probably use the Valporaiso Moraine as a potential boundary due to its close lake shore proximity and also include parts of Northern Indiana.

In summary, we stronglyoppose this appelation and

TABOR HILL
VINEYARD & WINECELLAR

CHI COMPANY
RT. 2, BOX 720, MT. TABOR RD.
BUCHANAN, MICHIGAN 49107
(616) 422-1161

and feel that these points should be reviewed.

Very truly yours,

Richard C. Moersch, Winemaster

G.M. Merchant, Vineyard Manager

CES
COOPERATIVE EXTENSION SERVICE
MICHIGAN STATE UNIVERSITY • U.S. DEPARTMENT OF AGRICULTURE & COUNTIES COOPERATING

VAN BUREN COUNTY EXTENSION OFFICE • 226 EAST MICHIGAN AVENUE • PAW PAW, MICHIGAN 49079 • (616) 657-5564

January 24, 1983

Chief, Regulations and Procedures Division
Bureau of Alcohol, Tobacco and Firearms
P. O. Box 385
Washington, D. C. 20044-0385
Attn: Notice No. 441

Dear Sir:

We are pleased to support the requested designation of the Lake Michigan Shore Viticultural Area and to reply to the ATF's particular concerns of possible consumer confusion, alternative boundaries, alternative names and additional geographical evidence.

We feel that with the viticultural problems related to growing currently available grape varieties and species that it is specious to be concerned with consumer confusion. It is extremely unlikely that wine grapes can be grown successfully on any but the east shore of Lake Michigan with the exception of some possibilities on the Door County Peninsula in Wisconsin. If, however, grapes were established there, area identity is already so strong that any producer would, as soon as practical, petition for a viticultural area designation under your rules and regulations. Consumers in the Midwest who are at all familiar with Midwest wines equate this requested region of Michigan as the wine producing area on Lake Michigan. None of the other Lake Michigan states - Indiana, Illinois and Wisconsin - have historical consumer awareness as wine producing centers nor is any likely in the near future.

Alternative boundaries for the area would change little the substance of the intended viticultural area and be difficult to do under ATF regulations. There is only one wine grape vineyard in northern Indiana that we are aware of and it has been abandoned for the last two years due to poor economics in the wine industry. That vineyard is within 500 yards of the proposed southern boundary of the viticultural area, the Michigan-Indiana state line. The boundaries north and east as proposed do not exclude any wine grape production as it currently exists and includes well in excess of 99 percent of the sites with any grape potential within 30 miles outside those boundaries. The area in northern Indiana that receives lake effect climate modification is and will continue to be rather ill defined. The lake effect is conditioned by the direction from which the mass of a front or weather system is coming from. The lake effect is greatest when fronts are from the west to northwest when the whole expanse of the lake has a chance to moderate the weather system. When from any other compass direction, including southwest, the fronts do not get modified and act the same as they would in Wisconsin or Illinois.

"Extension programs are open to all without regard to race, color, sex or national origin"

Southwest to northeast wind flows are common in spring and fall and have always made fruit production outside of the proposed area somewhat iffy. Almost all fruit produced outside of this area is produced by growers who use site elevation and direct-to-consumer marketing to lessen the vagaries of Mother Nature and to produce additional income necessary to overcome the increased frequency of partial crop failure. Because of the lack of predictability of the lake effect and the economics of wine grape production, it is unlikely that any substantial acreage will be established in the adjacent areas in the foreseeable future.

The issue of alternative names is no less complex. The names Fruit Belt and Southwestern Michigan have major problems when applied to a designated viticultural area. Southwestern Michigan has no particular area and encompasses from five to ten or more counties, depending on which agency or person you are talking to. Southwest Michigan includes the area known as the Fruit Belt which was dreamed up by enterprising land developers in the 1800's to promote the development of the area from the state line to Saugatuck and close to the lake where peaches, at that time the major crop, could, with some success, be grown. The wide diversity of horticultural crops since grown in the area has changed the connotation of the name to a great extent and eliminates any particular specific value to wine producers as an appellation. In point of fact, that name would be harmful to the wine producers as fruit wines have generally been considered poor cousins of any grape wine and certainly of the fine wines produced in this area. Any fruit designation on wine by implication would relegate it to second-class citizenship among wines. In the absence of other names which accurately define this area in total, the proposed Lake Michigan Shore appellation, although not as effective as a Napa Valley or Finger Lakes, is the best available for descriptive purposes.

The application appears to have addressed the geological evidence in accurate and sufficient detail to define the area appropriately. The use of railroads and political boundaries describes in better detail the eastern and southern borders than any other method due to the lack of geologic features with place names that can be incorporated in a description and the glacial creation of the soils and elevations within and adjacent to the proposed viticultural district. There are also no geologic features that accurately define the lake effect on climate that make this area a viable grape production area and excludes those areas outside of the boundaries.

In summary, we would like to support the contention that this is a recognizable viticultural area and meets the requirements to be so named that your agency demands.

January 24, 1983
Chief, Regulations and Procedures Division
Bureau of Alcohol, Tobacco and Firearms

Together we have 40 years of experience working with the fruit industries in this part of Michigan as employees of Michigan State University Cooperative Extension Service and in private industry. We hope that experience will supply credence to our testimony.

Sincerely yours,

T. M. Thomas

T. Michael Thomas
District Extension Horticulture
and Marketing Agent
TMT/cm

Bob Earl

A. Robert Earl
County Extension Director

(5)

MARIANO MECONI, FOUNDER
ESTABLISHED 1921

St. Julian Wine Company

PRODUCERS OF FINE WINES AND CHAMPAGNES

MAIN OFFICE — 716 S. KALAMAZOO ST., PAW PAW, MICH. 49079 PHONE AREA CODE 616 657-5568

January 25, 1983

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

Attention: Notice No. 441

Dear Sir:

This letter is in regard to the "Lake Michigan Shore" appellation of origin. The local wine community, as well as the consumers of our products, will enjoy numerous advantages with the approval of this petition.

The area included in this petition has been associated with winemaking for many decades. No other region bordering this lake has been significantly involved in winemaking, except the recently approved "Leelanau" appellation of the northern lower peninsula of Michigan. In my opinion, the best possible name of those submitted was chosen to become the formal name. The wine industry in this area needs a name that is descriptive and attractive from a marketing standpoint; a name that looks good on the label and immediately states the geographic identity of the wine behind the label. This label will serve to diminish consumer confusion and help potential consumers readily ascertain the origin of the wine they plan to purchase.

Consideration was given to including a portion of northern Indiana in the petition and this portion was not included for several reasons. Commercial winemaking does not presently exist in that area. Many unsuccessful attempts have been made and future prospects look unpromising. The boundaries in Indiana would be difficult to define as they have never been truly tested. Little data exists in determining borders and the inconsistency of what Indiana grown crop does exist as compared to that of "Lake Michigan Shore" area makes justification of this expanded area less evident.

The submitted boundaries of the "Lake Michigan Shore" area have stood the test of time and evolved their present location through repeated trials. There is significant scientific data to support evidence of what exists here. I strongly urge you to consider the adoption of the petition as submitted.

Sincerely,

David R. Braganini

David R. Braganini
President

gb