SOUTH COAST VINTNERS ASSOCIATION
c/o San Pasqual Vineyards
13455 San Pasqual Road
Escondido, California 92025

August 27, 1984

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

Re: Application for Viticultural
Designation for "South Coast."

Dear Sir:

This letter is for the purpose of making an application for the creation of "South Coast" as a designated viticultural area under the provisions of 27 CRF Section 4.25. The application is submitted on behalf of its members by the South Coast Vintners Association. In support of this application the applicant provides the following factual information:

1. Evidence of Name Identification. Distinctions respecting grape growing areas in California have principally related to the total heat receivable by the area over a year's period, classified by the University of California at Davis on a "heat summation" scale, from Zones I through V. Zones I through III are generally located in an area benefiting by ocean influence -- Zones IV and V are typically inland valleys. As growing locations proliferated in the 1970s the importance of ocean influence became better known, and areas of such influence came to be known as "coastal." While relationship to sea climates was perhaps the most important factor in such "coastal" weather, latitudinal location was also important. Coastal zones therefore commenced referring to themselves as "North Coast," or "Central Coast." Initially, some confusion as to just where the various "coastal" zones were was exhibited. In very recent times, however, with some assistance from federal appellation zones already established, a reasonable consensus as to the location of the various coastal zones has been achieved. As examples of this consensus, applicant refers to two very recent publications -- Wine Maps, published by The Wine Spectator in 1984 (The Wine Spectator, Opera Plaza Suite 2040, 601 Van Ness Avenue, San Francisco, CA 94102); and Modern Encyclopedia of Wine by Hugh Johnson, 1983, published by Simon and Schuster of New York.

In "Wine Maps," the various coastal areas are designated as "North Central Coast," "South Central Coast," and "South Coast." The publication does not identify a "North Coast," it is submitted, because it breaks down the northern California coastal area into smaller wine districts. A copy of page 4 of the publication is appended hereto, which shows the various coastal designations. A copy of page 32 is also appended, showing the complete area embraced by the application herein.

Johnson's Encyclopedia at pages 412 through 417 provides an analysis of the viticultural districts of California. With reference to "coastal" districts it identifies "North Coast" as "an inexact term for the counties north of San Francisco Bay." "Central Coast" is identified as "an inexact term for counties between San Francisco and Santa Barbara." While no definition of "South Coast" is provided by this volume, San Diego is identified as "Southernmost coast county," and Riverside is identified as "the principal wine county of Southern California."

A search of current wine literature reveals that all winegrowing areas north of Los Angeles (meaning Ventura, Santa Barbara and San Luis Obispo Counties and those to the north) refer to themselves as either Central Coast or North Coast. Logically, therefore, those counties from Los Angeles to the south, if they are coastal, should be designated "South Coast."

2. Historical or Current Evidence of Boundaries: Identification of grape growing areas as "North Coast," etc., is of recent origin. Modern winegrape growing in Southern California dates only from the late 1960s. Therefore, there is little by way of "historical" evidence to support this petition. The best "current" evidence of the propriety of the appellation is the appropriation of same by the only association of vintners in existence in the area. The South Coast Vintners Association was incorporated in the State of California by articles filed with the Secretary of State on January 31, 1984. Its articles provide that its purpose is:

> "to promote the interests of wineries located in the coastal regions of California south of Ventura County."

Referring to the appended detail map of South Coast, it will be seen that almost all of the wineries identified on that map, which are within the geographical boundaries of the appellation,

belong to South Coast Vintners Association. Included in the Association are Culbertson, Hart, Callaway, Piconi, Mount Palomar, Mesa Verde, Cilurzo, Filsinger, Ferrara, San Pasqual, Point Loma and Menghini.

The South Coast Vintners Association was formed several years prior to its formal incorporation. During the period of its existence it has created publications featuring "South Coast" wines, has held joint tastings and public relations functions, and generally has sought to create name and location identification in the wine industry for "South Coast" fine wines. A copy of the South Coast Vintner's most recent publication is appended hereto.

3. Geographical Features Distinguishing the Area. The specific boundaries of the proposed area are as designated in part 4 hereunder. The objective of the applicant is to describe those specific areas of South Coast which are presently utilized for fine table wine production, or which could potentially be so utilized. Ventura County is deemed to be part of "Central Coast" (and is so identified in "Wine Maps"). No doubt portions of Los Angeles County would qualify for inclusion as "South Coast." However, as a practical matter the entire Los Angeles County coastal area is urbanized and no present or potential grape growing areas exist. Since no grapes come from Los Angeles County, and it is very unlikely that any ever will, it was considered confusing to include the County in "South Coast."

The other limiting factor to the areas included in the desired appellation was the reference to "coast." Applicant believes that "coast" infers some substantial coastal influence on the grape growing areas involved, resulting in classification of same as Zones I through III of the Davis scale. While many grapes are grown in San Bernardino, eastern Riverside, eastern San Diego and Imperial Counties, they are grown in Zones IV or V, and are primarily table grapes rather than wine grapes. The geographical limitations were drawn in an effort to include only those areas of the three involved counties which are truly "coastal" in influence.

4. Specific Boundaries of Viticultural Area. The proposed viticultural area includes the following:

Orange County: the entire county

Riverside County: Generally, a small portion of the County in the southwestern corner thereof, where vineyards in areas generally known as Murietta, La Cresta, Temecula and Rancho California exist. These areas are embraced within the lands in Range 1 West and westerly thereof, and Township 7 South and southerly thereof.

San Diego County: Generally, the entire county west of the major rim of coastal mountains lower than an altitude of approximately 4,000 feet. Specifically, the line has been drawn from the Riverside County Line where the western border of Cleveland National Forest traverses southward, to a point where the Cleveland National Forest boundary line joins Highway 76; south along Highway 76 to the point where it reaches the northerly boundary of Township 11 South; thereafter all lands in Township 11 South and southerly thereof, which are in Range 3 East and westerly thereof.

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The total area includes roughly 1,800 square miles, at least 15 wineries, and has within it approximately 3,000 acres of winegrapes.

5. Attached hereto are copies of the U.S.G.S. map upon which the boundaries of the desired viticultural area have been prominently marked (except for portions of Orange County).

In conclusion, the South Coast Vintners Association represents that the designation of the desired "South Coast" viticultural area will benefit consumers and the wine industry by permitting specific identification of a newly emerging winegrowing area, the wines of which are characteristic of the area and will benefit by the nomenclature "South Coast." Therefore, it is requested that the Bureau undertake such investigation and other procedures as may be deemed appropriate, and thereafter that it issue its ruling establishing "South Coast" as a designated viticultural area.

Very truly yours,

Charles W. Froehlich, Jr.
Designated Agent,
South Coast Vintner's Association

CWF:ma
Enclosures

Key Map

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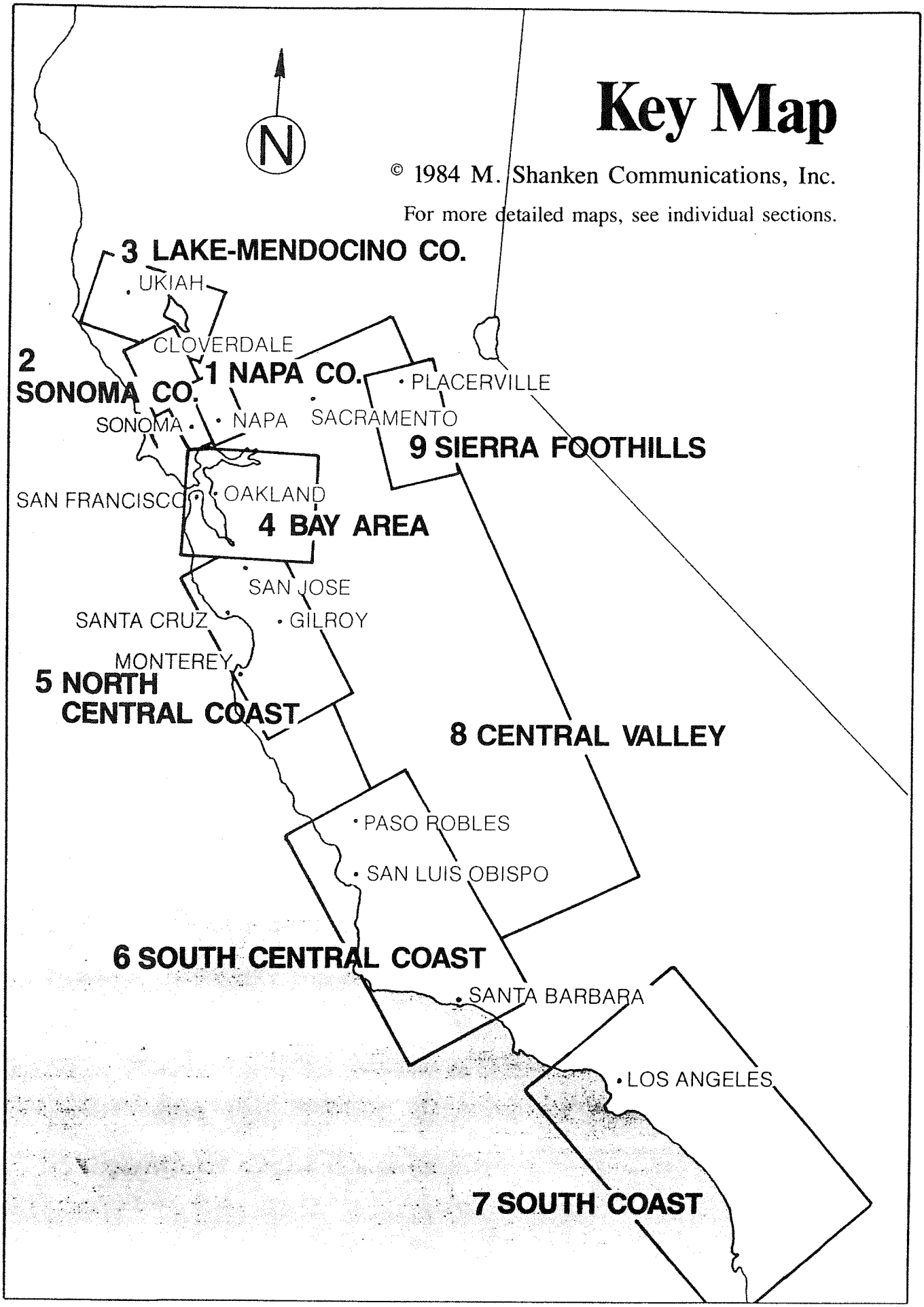
For more detailed maps, see individual sections.



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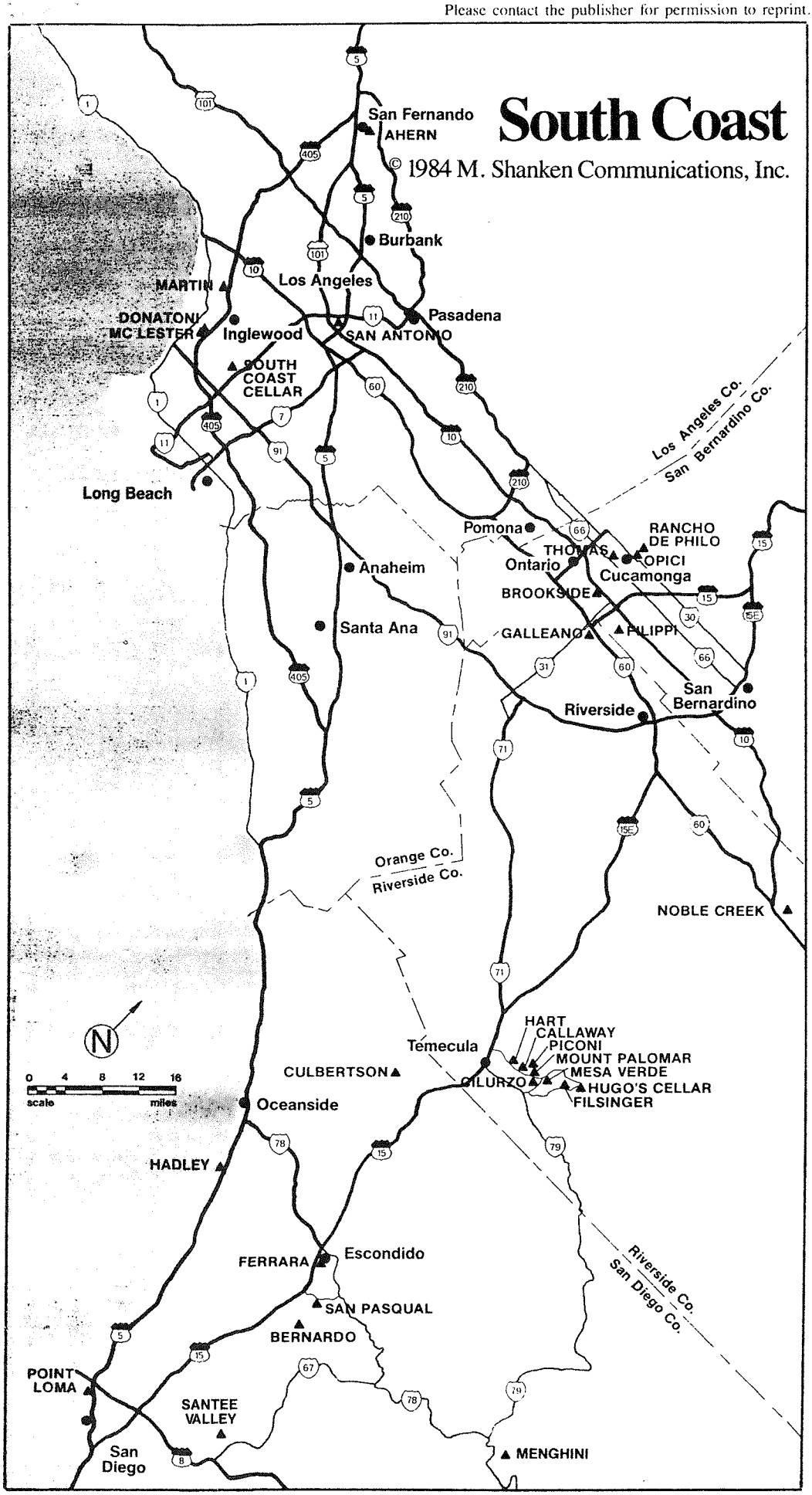

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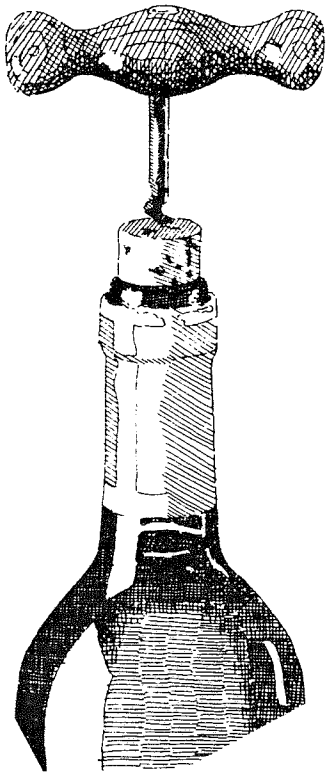

Alexis Lichine's New Encyclopedia of Wines & Spirits (1984)

time-consuming human chore. To speed up production of sparkling wines at Korbel and other *méthode champenoise* champagne cellars, a new device gently shakes many bottles at once to dislodge the tartrate sediment in the bottle neck for removal. Taittinger and others in the Champagne district in France have converted to this method.

California viticulturalists have improved their techniques of irrigation and have invented new ones for using water in frost protection. The most common device used previously to counter the disastrous spring frosts—which can destroy 75% of the crop—was the old-fashioned smudge pot. It has been replaced in many vineyards by sprinklers which spray the vines during the early morning hours, when the cold takes its heaviest toll. The water on the tender leaves and shoots will freeze at 32°F. and in the process give off a modicum of heat that protects them. In addition, the mist in their air prevents the air temperature from falling too low. Since such systems need at least 50 gallons per minute for each acre to be protected, storage ponds and reservoirs have been dammed to guarantee the supply. But as the call is raised to leave the streams and valleys of many counties in a natural state, it has often been difficult for growers to find the water for frost protection programs.

Just as water for frost protection is not needed in every part of California, neither is it required for irrigation all across the state. In the North Coast districts, where annual rainfall is 30 to 40 inches, many vines are not irrigated, while others may have one deep soaking during the hottest part of the summer. For these plantations irrigation and frost control is often supplied by one sprinkler system. Other parts of the state have climates not so fortunate as some of the areas north of San Francisco. In the San Joaquin Valley, for instance, as much as three acre-feet (43,560 cubic feet) of water are needed each season to ensure good wine grape crops. In those places where it is required, the method of irrigation will vary. The new "drip" plan from Israel waters the plants with a light trickle of water from ground-level pipes. And those same sprinkler systems popular for frost control and irrigation in cooler parts of the state are also employed in the hot climates, where the fine mists help to keep temperatures down when the scorching sun may burn the grapes.

Since supplies of water for any purpose may be more expensive in the future, it is fortunate that not all of the new measures for warding off the spring and even autumn cold rely on it. Wind-machines are one such development. Ground-level models simply circulate the air over the vines to keep the temperature from dropping. Those mounted on towers mix the cool lower-level air with warmer air from above. Another new device is a sophisticated combination of the wind-machine and the smudge pot. Its propane heater first warms the air, then its blowers distribute the hot gas through the vine rows in a series of inflatable plastic ducts.

GRAPE VARIETIES

With the demand for good table wines increasing, more good varieties of *Vitis vinifera* are being planted in California than at any previous time. Unfortunately, however, some growers seeking fast profits from the high prices paid for the very best grapes are planting Cabernet Sauvignon, Pinot Noir, or other fine varieties in districts with climates much too hot for these vines to produce properly.

The largest single expansion of varietal plantings has occurred in Monterey, the lower end of the North Coast wine region. In the hot interior valleys such as the San Joaquin, there have also been improvements in the quality of the grapes. The attempt is being made to reduce the acreage of Thompson Seedless and other table grapes used regrettably for wine, in favor of sound *vinifera* or cross varieties.

The warmest parts of the state will never produce great wine from the classic European varieties, but with carefully selected vines—especially some of the crosses bred by the researchers at Davis—the average quality of much of the bulk wine can be raised.

As good wine grapes became more available, many California wines took on the name of the grape from which they were made.

A few of the red-wine grape varieties successfully planted in California are the Cabernet Sauvignon (sometimes referred to simply as Cabernet but not to be confused with the Cabernet Franc), Pinot Noir, Gamay Beaujolais, Grenache, Barbera, and Zinfandel. Some of the recommended white grape varieties are the Chardonnay, Sauvignon Blanc, Sémillon, Chenin Blanc, Pinot Blanc, White or Johannisberg Riesling, Sylvaner or Franken Riesling (sometimes called Riesling), Gewürztraminer and Traminer (also called the Red Traminer).

VINE-GROWING REGIONS

There are six natural vine-growing regions in California—the North Coast, the Sacramento Valley, the Central Valley, the San Joaquin Valley, the South Coast, and San Luis Obispo. Each has its well-known districts, and almost every grape and type of wine is produced in one or more of these.

These districts are gradually gaining the official recognition they deserve, in the form of BATF (Bureau of Alcohol, Tobacco and Firearms)-designated appellations. As the number of wineries and total wine productions continue to rise, the need for these standard-setting appellation laws becomes more obvious and urgent.

On the following pages is a listing of California's more prominent wineries. Efforts have been made, in quoting production figures, to estimate the amounts the wineries will produce by the late 1980s.

North Coast

The North Coast region is north and south of San Francisco Bay in the many valleys which lie parallel to the coastal ranges and is generally characterized by warm summers and moderate annual rainfalls. The best dry table wines, both red and white, are grown here. The principal districts are Napa, Sonoma, Mendocino, Livermore, Santa Clara, San Benito, Santa Cruz, and Monterey.