December 4, 1979

Mr. G. R. Dickerson, Director
Bureau of Alcohol, Tobacco and Firearms
Post Office Box 385
Washington, D.C. 20044

Attention: Mr. Thomas Minton - Research and Regulation Branch

Gentlemen:

Pursuant to the provisions of USC 27 CFR 4.25 a (e) (2), we hereby petition for the establishment of an American viticultural area to be named "Los Carneros".

Your favorable consideration of this request is greatly appreciated.

Very truly yours,

[Signature]

Victor E. Gallicchio
Director, Federal Compliance
Heublein, Inc.

VEG: mcw
The crescent shaped region extending across the southern portion of Napa County and skirting San Pablo Bay is locally known as the Carneros area. Established as part of three early land grants, this region was briefly farmed under vineyards during the late 1800's and the early part of the century. After reverting to pasture land following Phylloxera and Prohibition, this area is once again being developed under vineyards.

The three early land grants are shown on the attached maps as Huichica, Entre Napa and Rincon De Los Carneros. We have found vineyards established in this region to be different in character to vineyards established in other parts of Napa County.

I) Proposed Boundary.

Attached are the following United States Geological Survey maps.

1) Sears Point Quadrangle.
2) Sonoma Quadrangle.
3) Napa Quadrangle.
4) Cuttings Wharf Quadrangle.

Continued . . .
i) Commencing with the S.W. corner at the junction of the Napa County, Sonoma County, and Solano County lines, the proposed Western boundary would run North from this junction point along the Napa County/Sonoma County line to the intersection of the T.6.N./T.5.N. township line with the Napa County/Sonoma County line.

ii) The proposed Northern boundary would run East of this junction along the T.6.N./T.5.N. township line until the point of intersection with Browns Valley Creek. The Northern boundary would follow Browns Valley Creek Eastward to the junction with Napa Creek. The boundary would then follow the Napa Creek to the Napa River.

iii) The proposed Eastern boundary would run from the Napa Creek/Napa River intersection in a Southerly direction following the Napa River. The S.E. (Southeast) corner would be the Napa River intersection with the Napa County/Solano County line.

iv) The proposed Southern boundary would be the Napa County/Solano County line between the Napa River in the East and the Sonoma County line in the West.

In summary the proposed boundaries are:

Western Boundary - Sonoma County/Napa County line.
Northern Boundary - T.6.N./T.5.N. township line, Browns Valley Creek, Napa Creek.
Eastern Boundary - Napa River.
Southern Boundary - Napa County/Solano County line.

The proposed boundaries of the Carneros viticultural region have been established utilizing readily recognizable topographical features on the attached U.S.G.S. maps. These maps are readily available to the public.

In establishing these boundaries based on topographical features, certain non-productive areas were included. These areas are:

i) Portions of the City of Napa and township development areas in the N.E. (Northeast) corner.

ii) The flood plan of the Napa River along the Eastern boundary.

iii) The area occupied by State Highway construction along the Eastern boundary.

iv) Mud flats and heavily saline soils along the Southern boundary, and the S.W. (Southwest) corner.

v) Mountain ranges and terrain not generally suitable for vineyard development along the upper portion of the Western boundary and the N.W. (Northwest) corner.
vi) Housing developments along the Northern boundary.

With regard to the above stated excluded areas, these generally viticulturally non-productive areas serve further to isolate the Carneros region from other parts of the Napa Valley.

II) Geographical Features.

Geographically, the Carneros area of Napa Valley differs markedly from other parts of Napa Valley.

i) Soils - The overall terrain is more undulating, with most vineyards located on slopes in comparison to the flat terrain of vineyards located North of Napa City. The soils of this region are generally poorer and primarily of the Haire-Coombs soil type, rather than the Bale-Cole-Yolo soil types encountered in the other parts of Napa Valley.

The 1978 Napa County soil survey describes these soils as:

Bale-Cole-Yolo - Nearly level to gentle sloping, well drained and somewhat poorly drained loams, silt loams, and clay loams of flood plains, alluvial fans, and terraces.

Haire-Coombs - Nearly level to moderately steep, moderately well drained and well drained gravelly loams, loams, and clay loams on terraces.

(Source: Soil Survey of Napa County, United States Department of Agriculture, August 1978)

In general we have found the soils in our Carneros vineyards to be generally cooler, shallower, somewhat less well-drained and higher in sub-soil clay content than our Rutherford/Oakville vineyards. These Carneros vineyards remain wet until late Spring, significantly delaying the start of Spring cultivation and dry out rapidly in Summer, making irrigation essential. We have found these soil characteristics to reduce vine yield and produce quality fruit from specific varieties.

ii) Microclimate - When compared to other parts of Napa Valley, Carneros has a long cool growing season. In general, the region is crescent shaped and follows the San Pablo Bay. The close proximity of this water mass, greatly influences the daily temperatures, and generally results in a more moderate climate. Daytime highs are slightly lower than other parts of Napa Valley, and the Carneros region cools off in the afternoon faster than other parts of the Napa Valley because of daily sea breezes. These cool ocean breezes rapidly drop the air temperature and vine temperature so that the vine does not experience high afternoon temperatures during the Summer.
Consequently this makes for a cool growing season and also lengthens the growing season slightly. Because of the cool growing conditions in Carneros we have found bud break, and bloom, to be approximately 7-14 days behind our other Napa Valley vineyards. It has also been our experience that the Carneros region is too cool to adequately mature/ripen Cabernet Sauvignon grapes.

In conclusion, it has been our experience that the soil type and micro-climate of the proposed Carneros viticultural region require cultural practices different from those of other parts of the Napa Valley. Also, this region is more suited to the early ripening grape varieties - Pinot Noir and Chardonnay. These wines, when produced at our winery from Carneros region grapes, are significantly different in character to those produced from the same varieties grown in vineyards to the North of Carneros.

We feel that the Pinot Noir grapes are different in that there are higher levels of tannins and the resulting wine color is more intense and also more stable. Both the aroma and flavor are also very intensely varietal and have a distinctly regional character.

The Pinot Chardonnay grapes have a very good sugar/acid balance due to the long, cool growing season and have excellent varietal character.