



Mount Pleasant Wine Co.
Augusta, Mo. 63332



July 25, 1979

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

Dear Sir:

I am writing to you concerning: 27 CFR Part 9, Notice 325, (American Viticultural Area Designations.)

I believe it would be very helpful and important to hold a public hearing on these proposed regulations and I desire an opportunity to comment orally on them.

This hearing would be the first opportunity the public has had to comment on them since these regulations were proposed in a very formative state several years ago.

A public hearing will create a level of awareness of these new regulations that would not be possible through the Federal Register or a few limited press releases. Since there are many persons in, and near, the proposed Augusta Viticultural Area whose economic livelihood could be affected by the regulations, I feel it essential that we give all persons a chance to comment and give them the adequate notice that only a public hearing can provide.

Although I can say, at this point, that I anticipate no great controversy over the establishment of the area, I also realize that opposition can come from unexpected quarters and objections can be raised that have often been overlooked.

Although we greatly desire to have this viticultural area approved, and do not desire negative comments, it would none-the-less be far better to get any potential negative reactions out in the open through a public hearing rather than to give someone the opportunity to complain at a later date that adequate notice and publicity were not given to anyone except the wineries and growers directly affected.

I am sure that once the Augusta area is established that few of us would wish to then have to consider amending the boundaries to accomodate persons who might make a case of not having had the chance to have had their say. To hold hearing later, to amend the district, would be more costly, disruptive, and indicitive of an original lack of thoroughness.

I appreciate the care with which these regulations were formulated, and I request that we simply complete the logical and necessary sequence of events by holding a public hearing on them in Augusta, Missouri.

Sincerely yours,

[Redacted signature]

Lucian W. Dressel

LWD/jcg

BOARD OF TRUSTEES
TOWN OF AUGUSTA
AUGUSTA, MISSOURI

AUG 27 1979

August 2, 1979

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

Dear Sir:

This letter concerns (27 CFR Part 9, Notice No. 325, American Viticultural Area Designations).

As Mayor of the Town of Augusta Missouri, I, or another member of the Board of Trustees, desire an opportunity to comment orally at a public hearing on these proposed regulations.

As you know, the town of Augusta has a long and colorful history as one of America's oldest and most distinguished wine towns. Founded in 1854, Augusta had no fewer than eleven wineries before prohibition, and there are presently two wineries operating in the proposed area.

A hearing would be most helpful and important in informing the public of the nature of this district as well as in giving persons the opportunity to offer opinions on the proposed district.

In the event hearings are held in Augusta, you may rest assured that the hospitality and cooperation of our town will be extended to you.

Sincerely yours,

[Redacted signature]

Melvin Fuhr
Mayor, Augusta, Missouri

MF/jcg

3.



**DEPARTMENT OF AGRICULTURE
STATE OF MISSOURI**

JOSEPH P. TEASDALE
GOVERNOR

P.O. Box 680
JEFFERSON CITY 65102

JACK RUNYAN
DIRECTOR

AUG 27 1979

August 10, 1979

Director
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 385
Washington, D. C. 20044

Attention: Chief, Regulations and Procedures Division

Dear Sir:

I understand from reading the Federal Register that the United States Treasury Department, Bureau of Alcohol, Tobacco and Firearms, has decided to name the first district in the U.S. Wine Area "Augusta", Missouri.

As we in agriculture feel this is a big plus for Missouri and Augusta Valley, we in the Department of Agriculture would like the Department of Treasury to hold hearings on the wine district in Missouri and I myself would like to testify at the hearing.

Again, I cannot stress the importance of your decision to Missouri agriculture and especially the vitners of our state. I hope that you will decide very soon on the hearings and will let me know when they will be held.

Yours truly,



Jack Runyan
DIRECTOR

JR:jh

7800 Bonhomme Avenue
St. Louis, Missouri 63105
(314) 725-2662

20 August 1979

AUG 27 1979

Director
Bureau of Alcohol, Tobacco
and Firearms
U.S. Treasury Department
P.O. Box 385
Washington, DC 20044

Attention: Chief, Regulations and Procedures Division

Gentlemen:

In my capacities as Chairman of the Augusta Valley Wine Advisory Board, as Chairman of the Missouri Wine Industry Task Force and as an interested citizen, I am writing concerning 27CFR Part 9, Notice 325 (American Viticultural Area Designations), with the request that hearings be scheduled on the proposed regulations as they relate to the designation of the Augusta Valley Viticultural District.

While I know of no opposition to the proposed designation, I believe that it would be wise to provide an opportunity for comment by any and all interested parties. It is likely that other areas in Missouri, as well as in other states, may later wish to apply for similar designations. Hearings on this first application for Augusta Valley, would provide helpful guidance for such subsequent applications, as well as an opportunity for anyone interested to comment and querie.

The town of Augusta Missouri would seem to be the most appropriate site for such a hearing.

I should expect to attend such a hearing, and to be most interested in the proceedings.

Very Sincerely,


Howard K. Nason

HKN/jb

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Saint Philip's Episcopal Church

706 Byers Avenue
Joplin, Missouri 64801

David C. Patrick, Rector
W. Joseph Leigh, Curate

Telephone: 417 623-6893
Mailing Address: P. O. Box 476

AUG 27 1979

13 August 1979

Director, Bureau of Alcohol, Tobacco and Firearms
P. O. Box 385
Washington, DC 20044

Attn. Chief, Regulations and
Procedures Division

Dear Sir:

I am the author of a weekly newspaper column on the subject of wine, appearing in The Joplin Globe, a daily newspaper with a circulation of 42,000. I also write on wine for the St. Louis Magazine.

I understand that Augusta (MO) has recently applied for recognition as a viticultural district, the first such region in the United States to do so (Notice # 325, 27 CFR Part 9). I think that it would be helpful for the Missouri Wine industry, and for the Augusta district, if the BATF were to hold hearings at Augusta on this matter. This would greatly promote the production of quality wines for our state.

With every good wish, I am

Faithfully yours,



David C. Patrick

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PEACEFUL BEND VINEYARD

STEELVILLE, CRAWFORD COUNTY, MISSOURI 65565

2572 - 2578
314-775-7917

ROUTE 2 - BOX 131

August 14, 1979

AUG 27 1979

Director,
Bureau of Alcohol, Tobacco and Firearms
P. O. Box 385
Washington, D. C. 20044

Attn: Chief Regulations and Procedures Division

27 CFR Part 4
Subpart C
9.22 Augusta

Dear Sir:

We support Bureau acceptance of the above described region as an approved viticultural area to be designated "Augusta". The name carries substantial historical significance. It encompassed, at one time, a large proportion of all wineries then in Missouri. In recent years it has recaptured the status enjoyed during the latter part of the nineteenth century, and the years preceding prohibition. Leadership displayed then, as well as now, has advanced horticulture, improved selection of grape varieties for cultivation in our area, and demonstrated that Missouri can produce wines of high quality.

Early wine industry was concentrated along the Missouri river and adjacent points of the Mississippi. The substantial number of wineries populating the Augusta area were usually of the small privately owned type. The proprietors were active participants in the Missouri Horticultural Society, and in the Mississippi grape growers association. The more recent revival of enology in Missouri has spawned a number of new wineries that are somewhat scattered, but for the most part find themselves concentrated into the eastern central portion of the State. All will be aided by designation of an approved viticultural area. There may perhaps be reason, at some later date, to expand the stated boundaries, or approve other viticultural areas in Missouri.

Most sincerely yours,


Arneson and Arneson dba
Peaceful Bend Vineyard
Steelville, Missouri 65565

cc: Mr. Lucian Dressel

Montelle Vineyards
Augusta, Missouri 63332

(314) 228-4464

Clayton W. Byers
founder

AUG 27 1979

August 14, 1979

Director
Bureau of Alcohol, Tobacco
and Firearms
P. O. Box 385
Washington, D.C. 20044

Attention: Chief, Regulations and Procedures Division

Dear Mr. Director:

Herein are comments on the proposal of Augusta for the American Viticultural Area designation.

Ours is one of two wineries with vineyards located in the proposed area.

In summary of what follows giving detailed reasons; (a) we are unequivocally in favor of such designation but (2) we believe there are both functional and philosophical reasons for holding a public hearing on the matter. Indeed, not to have such a hearing might become an example of unsound public policy.

Re the designation: Our reasons for favoring this are reflected by our application in your possession. By historical experience, by a protective microclimate, by the nature of our soil, by geographic position, weather data, and other criteria, we believe this discrete area qualifies under the definition set forth by the BATF's Notice No. 325. Those most fully informed of the past and the current development of quality wine here expect the Augusta area to distinguish itself as one of possible world renown in decades ahead. It should serve as an example for other qualified areas. The board of individuals, supervising it are well aware of the viticultural and enological stringency by which delimited European areas have achieved great quality. They, and we as vintners, covet no less for the proposed area, Augusta.

But of greater concern is (b), the hearing.

Part of the following rationale derives from my previous occupations of reporting (as a newsman) on the work of public and private agencies, followed by more than a decade of being the principal policy advisor for an agency carrying out a vast federal program, the acceptance and success of which were dependent on public understanding. (If details of that are desired, I will gladly supply them.)

Because the creation of any area identified by a tax-supported agency as being distinctive carries the implication that other areas are not similarly distinctive, there is the possibility that similar realms may have been portrayed as inferior by an agency of their government.

Montelle Vineyards
Augusta, Missouri 63332

(314) 228-4464

Clayton W. Byers
founder

page two

If this distinction - conferring process is carried out and finalized employing any limited or remote communications process, the agency so executing the action lays itself open to the charge of secret process even though such was not the agency's intent. It seems reasonable that any area not recognized may have some claim, which it could pursue through litigation and/or public media and through other levels of government and advocacy bodies, to having been disadvantaged and even in some manner damaged.

While a measure of publicity has been given in certain media regarding the creation of special districts, a comprehensive survey of this may indicate that word of this proposed action was far from all-reaching.

Any public protest that might result from this would be a matter of discomfort for all of us, and would diminish the satisfaction otherwise inherent.

If in the view of BATF or other Treasury persons the above possibility seems in even small measure likely, an avoidance course would seem advisable.

An open hearing on the matter, well publicized both within the wine trade and generally, would go far to stem any such criticism. Indeed, properly handled, it would portray favorably the intent of the BATF and Treasury to fully oversee its sphere of responsibility insofar as labeling the authenticity of an important one of its regulated products.

I think we can not overlook the intent and spirit of the framers of the Freedom of Information Act, in the late Sixties, amended in 1975, and given judiciary review at the highest level.

There is in Missouri a high level of consciousness regarding "sunshine law" public policy as reflected in passage of assuring legislation by this State's legislature in 1975. Newspapers statewide have supported such policy.

We are already aware of some negative reaction to our Augusta District's candidacy from at least one other part of the state. A public hearing would provide a forum for their viewpoint and give them the satisfaction of protesting, if they so desire, in a more public way than they can accomplish by written communication.

A public hearing would provide opportunity for our regulatory agency to show that it is not acting either unilaterally or in secrecy.

Yours truly,



Clayton Byers,
U. S. Bonded Winery No. 100 (Mo. 35)

Howard K. Nason *Consultant*

*R&D Management
Technology Utilization
Product Development
Nuclear Technology*

7800 Bonhomme Avenue
St. Louis, Missouri 63105
(314) 725-2662

15 October 1979

Director
Bureau of Alcohol, Tobacco
and Firearms
U. S. Department of the Treasury
P.O. Box 385
Washington, DC 20044

A ATTN: Chief, Regulations and Procedures Division
RE: Hearing, Augusta Viticultural Area
Notice No. 328

Dear Sir:

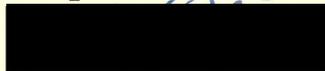
A previous committment for a NASA meeting in Houston will prevent my attending the hearing at Augusta, MO on 1 November 1979. As stated in my previous letter, I am very much interested in the establishment of the Augusta Viticultural Area and urge that this be approved.

The Augusta area is well known in Missouri for the quality of its wines. Prior to prohibition its wines were known nationally and internationally, receiving medals and citations at several international exhibitions, and were an important contribution to the State's agricultural income. Producers in the area now are adapting modern viticultural and oenological techniques, including cultivation of improved hybrid wines, to produce significant quantities of high quality wines, suited to the developing tastes of the American consumer.

The area, as defined in the petition, was recognized by the mid-19th Century, as a superior viticultural location, where soil type, exposure of the terrain, macro-and mirco-climates contributed to the growing of superior grapes for wine making.

Establishment of the Augusta Viticultural Areas as proposed would provide needed support for all of us who are working to improve the industry in Missouri.

Very sincerely,


Howard K. Nason

HKN/jb

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DEPARTMENT OF AGRICULTURE

STATE OF MISSOURI

P.O. Box 630

JEFFERSON CITY 65102

JOSEPH P. TEASDALE
GOVERNOR

JACK RUNYAN
DIRECTOR

October 22, 1979

Mr. Tom Minton
Bureau of Alcohol, Tobacco and Firearms
P.O. Box 385
Washington, D. C. 20044

Dear Mr. Minton:

I am proud to give testimony of support about the Appellation designation for the Augusta Valley. For many years it was the backbone of Missouri's Wine Industry. In 1978 the Missouri Department of Agriculture reviewed the needs for a vitners organization and became interested in the promotion of Missouri's wine industry. Since that point there has been a wide spread interest in not only more wineries in the state, but the increased production in the area of hybrid grapes that can be established all over Missouri.

I think it is only appropriate to start with Augusta since history tells us it is ideally located for the production of grapes.

Actually there have been some efforts in the United States for a rather long time to establish an Appellation program such as that existing in France. Everybody in the wine industry was certain that the designation would start off in the state of California, probably in Napa or Sonoma. Therefore, it came as a fantastic surprise when word commenced creeping out that it wasn't going to be a California district that was going to receive the first Appellation designation by the Federal Government, but rather a Missouri district and, specifically, Augusta.

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Mr. Tom Minton
October 22, 1979
Page 2

This is really perhaps more appropriate than one might readily realize when it is considered that Augusta was a very important wine producing wine district way back in the mid-nineteenth century. So possibly there is more justice in the first designation than the less knowledgeable might realize.

What is Appellation? Appellation means that the name that the wine bears is one officially recognized and legally defined by government decree; the wine must come from the specific district from which it takes its name, from certain established varieties of grape and no others and meet other specific conditions. It must, in other words, be genuine. This does not guarantee that it is to be good. This is a variable only controlled by the winemaker. This system began in France in 1935. Controls are rigidly enforced and violators are punished in France. I feel confident the same situation will exist in the United States. It is my understanding that only a few of the wines being produced in Augusta are going to initially qualify for the Appellation designation.

These wines are indeed entitled to this Appellation. Those in the industry are proud of this achievement. It could only happen in an area where soil, climate and winemaking techniques blend together to produce a top quality product.

Thank you for giving me the time to present feelings to testify concerning the designation of Appellation for Augusta.

Sincerely,



Jack Ruyyan
DIRECTOR

JR:jh

Larry S. Mims

Hamilton, Mi. 49419
October 20, 1979

Director
Bureau Alcohol Tobacco and Firearms
P.O.Box 385
Washington, D. C, 20044

Att: Chief, Regulations and Procedures Division

Re: Notice 328

Dear Sir:

Please make this letter a part of the record on the granting of an American Vinticultural Area Designation for Augusta, Mo.

While I have not seen the filing for the particular boundaries; I am very familiar with the area and the wineries therein. I would like to have a copy of the application with supporting documents if available but do not feel that they are necessary to add comment before your hearing scheduled for Nov. 1, 1979.

The Augusta area is unique geographically and culturally. This German community is a most beautiful area with steep hills, very much like German wine land, above the broad Missouri River valley. The distinctive wines reflect the peculiarities of this micro-climate. Such wines come from varieties like the Villard Blanc and Chancellor. These are characteristically different from other such wines even within the state of Missouri.

I have in my personal cellar wines from Montelle and Mt. Pleasant. I also have wines from Midi Vineyard in Lone Jack, Mo.; I enjoy all of them as the occasion permits but I do note regional differences although all vineyards are from the same state and same latitude. I would note regional differences in comparison with wines from Indiana such as Golden Rain Tree, Villa Madeo, and Easley; also from a midwestern climate and similar latitude.

I enjoy wines from all over the world and am a member of several French wines societies and have served in local wine clubs. It has however been a source of particular pride that I have been able to observe the substantial improvement of Eastern wines and the use their individual climates. None has done a better job of this than the wineries near Augusta, Mo.

I think the granting of the first vinticultural area to Augusta would be most proper. I would also think that this action would recognize the respect now due for Eastern regions and their wines. I urge you to the swift granting of this designation.

Sincerely yours,