

October 16, 2008

Frank W. Foote
Director, Regulations and Rulings Division
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 14412
Washington, D.C. 20044-4412

Re: Docket No. TTB-2008-0009

Dear Mr. Foote:

I write this in support of the proposed Alcohol and Tobacco Tax & Trade Bureau (TTB) rulemaking set forth in Notice No. 90, published in the August 20, 2008 Federal Register.

I prepared a report dated July 26, 2007 that was included with the Gallo Family Vineyards petition to the TTB concerning expansion of the Russian River Valley American Viticultural Area (AVA). TTB cited that report in the Federal Register Notice of this rulemaking. I am writing this supplement to that report specifically to support the proposed expansion of the Northern Sonoma AVA to include the areas in both the 2005 previous expansion and the current proposed expansion of the Russian River Valley AVA. As discussed below, the Northern Sonoma AVA is comprised of six AVAs, including the Russian River Valley AVA, in Northern Sonoma, and the unifying geographic feature of these AVAs is the Russian River watershed. Consequently, an area within the Russian River watershed that is added to the Russian River Valley AVA should also be added to the Northern Sonoma AVA.

The Northern Sonoma AVA was founded by, and has been largely a recognition of, a combination of six AVAs: Alexander Valley, Dry Creek Valley, Chalk Hill, Knights Valley, Russian River Valley, and Green Valley of Russian River Valley. The Northern Sonoma AVA recognizes the Northern Sonoma regional wine growing area as being separate from other grape growing regions, even though it is comprised of AVAs each with its own special wine grape growing characteristics.¹

Unfortunately, there has often been confusion about the Northern Sonoma AVA's geographic extent, because popular descriptions have lacked any statement of defining characteristics outside of the AVA's inclusion of the six constituent viticultural areas. For example, Appellation America, a website dedicated to familiarizing North American consumers with wine appellations, describes the Northern Sonoma AVA as including "just about all of Sonoma County, including smaller AVAs within it, except for its southern most appellations (Sonoma Valley and Carneros)."² Of course, while the Northern Sonoma AVA includes all or part of the existing AVAs north of Cotati, it does not include "just about all of Sonoma County." Furthermore, the Appellation America description suggests that the Northern Sonoma AVA includes large swaths of land not currently within the smaller AVAs. With the exception of the area added to the Russian River Valley AVA in 2005 and an area to the northwest of the Russian

¹ There are other examples of TTB recognizing AVAs that provide regional geographic context to adjacent, overlapping, and embedded AVAs. The Napa Valley AVA, for example, has climate that varies from cool in Los Carneros to hot in Calistoga. Yet the Napa Valley, as a body, is a nationally known geographic region unique from surrounding regions in name recognition, watershed, and variation in climatic patterns, with a strong reputation as a grape growing region.

² <http://wine.appellationamerica.com/wine-region/Northern-Sonoma.html>

River Valley, the Northern Sonoma AVA almost entirely corresponds to the areas in the six constituent AVAs.

The confusion regarding the proper extent of the Northern Sonoma AVA can be addressed by applying the perspective of geography. To begin with, Sonoma County can be broken down into three regions: Southern Sonoma, coastal Sonoma, and Northern Sonoma. Southern Sonoma and coastal Sonoma each have a distinctive identity.

Southern Sonoma is closely tied to the cities of Petaluma and Sonoma and the drainage basins of the Petaluma River and Sonoma Creek. These watersheds drain to San Pablo Bay, and as such, the area comes under the influence of this water source as well as coastal influences from winds blowing in through the Petaluma Gap. Furthermore, higher terrain to the east of Petaluma, which defines the interfluvium between Sonoma Creek and the Napa River, distinguishes most of Southern Sonoma from the Napa Valley. The Sonoma County Permit and Resource Management District supports this distinction, identifying the “Southern area” of the county draining to San Pablo Bay, and the “Northern area” of the county draining to the Pacific Ocean. A map demonstrating this distinction is attached.

While the Sonoma County Permit and Resource Management District groups the entire area north of the Petaluma River and Sonoma Creek watersheds as the “Northern area,” it ignores the common identity shared by those who live along the coast. Coastal Sonoma is often referred to as “Sonoma Coast” by local residents (but not as defined by the Sonoma Coast AVA). Some growers in the area refer to the area as “the true Sonoma Coast” in direct opposition to the extended size of the AVA known as the Sonoma Coast AVA. Among the grape growing areas in coastal Sonoma are Petaluma Gap (shared with Marin County), Freestone and Occidental, the Fort Ross-Seaview vicinity, and Annapolis. AVA petitions submitted for Fort Ross-Seaview and Freestone-Occidental make note of numerous references to the coastal wine growing communities, distinguishing them from grape growing regions inland.

Outside of the Resource Management District’s definition, Northern Sonoma is not as well defined as Southern Sonoma and coastal Sonoma, primarily because Northern Sonoma encompasses a larger area. Northern Sonoma is typically referred to as the sections of the county not generally considered to be in Southern Sonoma or coastal Sonoma. This would be the area north of the Cotati grade along Highway 101 to the Mendocino County line.

The geographic feature that is readily identifiable to Northern Sonoma is the Russian River and its watershed. The Russian River enters Sonoma County from the north, winds through Healdsburg, and then cuts west to the Pacific Coast. The river is a major recognizable feature in this part of Sonoma County, and many businesses, residential areas, and agricultural references take their name from this river. The Russian River serves as the major drainage for all six of the smaller AVAs that have defined the Northern Sonoma AVA. Furthermore, the interfluvium between the Russian River watershed and the Napa River watershed serves as the defining break between Northern Sonoma and Napa Valley to the east.

Not only is the Russian River watershed a defining feature in Northern Sonoma, nearly the entire area of the existing Northern Sonoma AVA, as well as nearly the entire area represented by the six AVAs that comprise the Northern Sonoma AVA, are part of that watershed. As such, the Russian River watershed represents the unifying geographic feature of the six AVAs that define the Northern Sonoma AVA. While the Russian River eventually cuts through the geographic region better known as coastal Sonoma, most of the coastal Sonoma area is represented by streams flowing directly into the Pacific Ocean and not via the Russian River. These coastal watersheds include the Gaulala River, Russian Gulch, Salmon Creek, Americano Creek, and numerous tributaries along the immediate coast. In essence, the Russian

River watershed appears as a funnel with a very large area inland, but only a small section of the coast west of Duncan Mills.

Given that the Russian River watershed is the unifying geographic feature for the viticultural area known as Northern Sonoma, the geography supports the expansion of this AVA to include Sonoma County inland areas within the Russian River watershed that are known to be viticulturally active. This rationale applies to past or future expansions of any of the six AVAs originally used to define the Northern Sonoma AVA.

In conclusion, Northern Sonoma is a recognized distinct region within Sonoma County. The historical presence of the Northern Sonoma AVA has only added to this recognition. The Northern Sonoma AVA has a close geographic association with the Russian River watershed, which is the common physical feature of the AVA. The Northern Sonoma AVA is also closely associated with the Russian River Valley AVA, which was one of its original constituent AVA's. Consequently, the previous 2005 expansion area and the proposed expansion area of the Russian River Valley AVA also should be added to the existing Northern Sonoma AVA. This expansion of the Northern Sonoma AVA is consistent with both the original definition of the Northern Sonoma AVA and the unifying geographic characteristic of the Northern Sonoma AVA and the AVAs within it.

Sincerely,



Patrick L. Shabram
Consulting Geographer

Enclosure