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PAGE 02

May 30, 2005

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Attn. Notice No. 39  
P. Q. Box 14412  
Washington, D.C. 20044

RE: Notice No. 39. Denial of Proposed Shawnee Hills AVA in its current form and suggested modification prior to approval

Dear Chief,

I write to express my opposition to the Shawnee Hills AVA proposal as described in Notice No. 39. My 4 acre vineyard, which we plan to grow to 8 acres in the next year, is located on a ridge along the Middle Fork of the Saline Creek near the Village of Muddy, Illinois.

The Middle Fork of the Saline Creek flows for **approximately 6-miles before** merging with the Saline Creek, which is the northern boundary of the proposed Shawnee Hills AVA. I have reviewed the data presented to justify excluding my vineyard, and find the interpretation of this data ludicrous.

My grandfather **and** my brother-in-law's grandfather grew grapes in this **area** in the 1920's. They had 10 acres of grapes along the same ridge where my late brother-in-law and I have planted our Seyval grapes. I attach a copy of a newspaper article from the Daily Register, Harrisburg Illinois which dates back to August 21, 1922. The article documents that grapes were grown successfully in this area before there was even a Shawnee National Forest, let alone a Shawnee Hills Trail. The Shawnee Forest was passed into law in 1939, when the use of the name 'Shawnee' prevailed over the name 'Lincoln'. To approve a Southern Illinois/Shawnee AVA without inclusion of historic vineyard sites such as our Flint Hill Vineyards area is a travesty of good judgement. To imply good fruit cannot be produced in an area other than that upon which the 5 vineyards are located in the original submission, is a blatant example of a self serving interest

I don't have any quarrel with the name 'Shawnee' but object to the whole area being labeled "Shawnee Hills" which is the **private** domain of a group of five wineries in the Anna-Cobden area. I have sold all the grapes that I care to sell to two wineries on the Shawnee Hills Wine Trail (inside the proposed AVA) in past years, and I remember that last year one of the winemakers was loud and excited about the quality of my grapes\_ It gives me no comfort to learn that some of my grapes will work their way into AVA wines that exclude my vineyard. if the Shawnee Hills AVA is approved, it will create an arbitrary boundary that will negatively affect the price of my grapes, and may even be totally displaced by less experience novice growers. As I said, our experience in viticulture dates back to the 1920's\_ I do not think you can simply overlook experience in **favor of a multi-averaged** climate **data** and pretend that this coarse and meaningless statistical averaging can be translated into wine quality. It just does not work that way. Referring to "Shawnee" as a part of the name of the proposed AVA, I will point out that the name of our vineyard, "Flint Hill", was chosen because of the great numbers of Indian artifacts found in our vineyard sites. There is little question that the Shawnee Indian tribe roamed this immediate territory, farther north than the original AVA submission describes.

To add a very personal note, as a young lad I found myself helping my Grandfather Virgilio in his vineyard, applying bluestone (Copper Sulphate) with an additive of nicotine to deal with the problems of grape farming. The vineyard is one and the same receiving accolades in the attached news item exhibit of some 83 years ago. At near 80 years of age, I know this **area belongs** in the AVA.

The consensus among the growers is that the more meaningful boundaries lie along the shores of the major rivers that are the boundaries of the state of Illinois and 1-64. Specifically, the boundaries should be: starting on the intersection of 1-64 and the Mississippi River, east along 1-64 to its intersection with the Wabash River at the Illinois-Indiana border, south along the Wabash River to its confluence with

the Ohio River, South and west along the Ohio River to its confluence with the Mississippi River, then north along the Mississippi River to its point of beginning. This is the most meaningful, representative, and worthwhile designation for an AVA in the southern part of Illinois. The good of the public can better be served using clearly defined and stated boundaries instead of wandering and meandering along little or unknown roads, intersections and waterway; with approximations of distance to cause confusion and question. And it should simply be called the 'Shawnee AVA'

Please, deny the proposed Shawnee Hills AVA or recommend that it be amended prior to its approval.

Sincerely,

John D. Molinarolo  
Flint Hill Vineyard  
2105 US Highway 45 North  
**POB 37**  
Muddy, IL 62965

ATTACHMENTS (2 NEWSPAPER ARTICLES) MAY BE REVIEWED  
IN THE TTB READING ROOM BY APPOINTMENT