

June 2, 2005

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

RE: Notice No. 39. Proposed Shawnee Hills AVA

Gentlemen,

My name is Randy Small. I am a grape grower and owner of Small Vineyard in the Carbondale area of southern Illinois. IL has come to my attention for the first time, that a Shawnee Hills AVA proposal is under review that would pass along the Route 13 corridor excluding me by a distance of approximately one-mile.

I am a part time grape grower and have been developing my vineyard since 2000 in the hope of generating some income for my retirement years. I want to voice my opposition to the proposed AVA on the grounds it would put my grapes in a competitive disadvantage and impose economic hardship on my existing enterprise. While there is no difference in the growing conditions between the north and the south side of Route 13, the current proposal would make it difficult for me to compete with growers of grapes of equal quality as close as one-mile away.

I am supportive of the concept of an AVA for southern Illinois, but the proposed Shawnee Hills AVA appears to draw the boundaries in an arbitrary fashion, arguing differences in climate, soils, elevation and topography where there are none; like along the Route 13, Route 127 and Route 4 boundaries.

I would like to add that the natural division for the growing conditions in the south of Illinois is along interstate 1-64. Technically, the line belongs somewhere between Cna and Mt. Vernon, but there are no vineyards that are visible from 1-04, hence it is the most practical boundary. North of 1-64 the growing conditions begin to

change gradually as the land flattens and the soil becomes richer.

I respectfully request that this proposal be denied as presented. Alternatively, it should be named the "Shawnee AVA" which should include all the land south of Interstate I-64, south along the Wabash River and the Ohio Rivers on the east and south east, and the Mississippi River to the west.

Sincerely,



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Randy and Cathy Snail

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