



4160, E-141, Suisun Valley Road, Fairfield, California 94534

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California Department of Food and Agriculture Marketing Services Division

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RE: The amendment proposed in this rulemaking action would modify the boundary between Grape Pricing Districts 5 and 17 utilized for the Grape Crush Report to include the Ryer Island region as part of District 17. To adopt or make changes to Title 3 of the California Code of Regulations (CCR), Division 3, Chapter 2, Article 1, Section 1700

On behalf of the Board of Directors of Suisun Valley Vintner Association, we are writing in strong support of the proposed amendment changes.

Growers in Grape Price District 5, who are located in the western portions of the district, including Suisun Valley, have long been aware of the annual grape value reporting variables unique to District 5. In particular district averages that are a convergence of interior and coastal reported values This results in data that is improperly reflective of the district as a whole, while creating inequity in assignment of average to many parties.

When presenting such data in sales negotiations (arguably the intent of the Berryhill Act) and considerations to crop insurance this has been highly problematic in establishing accurate value. Changing the boundaries of GPD 5 and GPD 17 resolves these 'averaging' inequities in GPD 5, while remaining highly consistent with values in GPD 17.

The proposed changes in the above referenced code resolve these data issues and thus would present representative values of both GPD 5 and GPD 17, allowing all growers and wineries impacted to understand they are using reliable and accurate data for their business purposes.

We greatly support the implementation of these changes to CA CCR 3

Submitted:

Roger King, Chair SVVGA Growers Committee, Treasurer.