



May 13, 2020



Jacob Appelsmith, Director
Department of Alcoholic Beverage Control
3927 Lennane Drive, Suite 100
Sacramento, CA 95834

RE: Request for Extension of Comment Deadline – Administrative Emergency Decisions

Dear Director Appelsmith,

Wine Institute, Family Winemakers of California, California Association of Winegrape Growers, California Artisanal Distillers Guild, California Craft Brewers Association, Distilled Spirits Council of the United States, and California Music and Culture Association request that the Department of Alcoholic Beverage Control (Department) issue a 30-day extension of the comment deadline for the proposed Administrative Emergency Decisions regulatory package to provide greater consideration of the potential impacts of these broad regulations. The proposed regulations go well beyond the scope of the current COVID-19 crisis. In addition to providing a more reasonable time in which to comment, we strongly advise the Department to narrow the proposed regulations to actions directly applicable to the current crisis.

Our associations recognize the significant threats that the current crisis presents and are deeply concerned with the health and safety of our employees, consumers, and the public at large. However, our associations are extremely concerned that the Department appears to be using the COVID-19 pandemic as an opportunity to push forward an extremely broad set of regulations to strip ABC licensees of their due process for actions undefined and unrelated to the current crisis. The broad scope and implications of this regulatory package, unrelated to the current state of emergency, should not be pushed forward as an emergency regulation.

If the Department decides to move forward with the currently proposed language, then our associations need an additional 30-days to fully vet and analyze the potential impacts of the regulations. Our associations and member organizations are doing everything they can to operate in compliance with the laws and ensure the health and safety of employees, consumers, and the public at large. The 5-day comment period on such a broad proposal is unreasonable given the immediate crisis.

If you should have any questions, Tim Schmelzer from Wine Institute can be reached at tschmelzer@wineinstitute.org and can act as a conduit for communication to our broader coalition. Thank you in advance for your consideration of this request.

Sincerely,

Tim Schmelzer
VP, California State Relations
Wine Institute


Michael Müller
Director of Government Affairs
California Association of Winegrape Growers



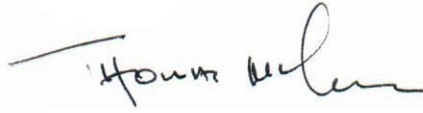
Pete Downs
President
Family Winemakers of California



Sean Venus
President
California Artisanal Distillers Guild



Ben Bleiman
Chairman
California Music & Culture Association



Tom McCormick
President & CEO
California Craft Brewers Association



Adam Smith
VP, State Government Relations
Distilled Spirits Council of the United States