



March 10, 2007

Director Regulations and Rulings Division
Alcohol and Tobacco Tax and Trade Bureau
Attn Notice No. 71
P.O. Box 14412
Washington DC 20044-4412
Fax # 202-927-8525

I wish to submit a comment in OPPOSITION to the Proposed Establishment of the Paso Robles Westside Viticultural Area.

I have lived in San Luis Obispo County for 31 years. My family has two vineyards in the county. One, in an area just north of the town of Santa Margarita, located in the proposed Paso Robles Westside. We also own a vineyard 6 miles east of the town of Templeton. We operate a small winery and make wines from the grapes grown in both areas.

The petition refers to an area formed by a RECTANGLE that runs from the Monterey County line in the north to just beyond the town of Santa Margarita in the south. If you refer to a map of the area, you will see that a more accurate description of the area would be a TRIANGLE with one point being the town of Santa Margarita. The proposed petition uses the Salinas River as the eastern border of the AVA. As the Salinas River travels north, it moves farther east from the Pacific Ocean and the Santa Lucia Mountain Range. The references to rain fall totals and temperatures on the west and east side of the river is very misleading to the consumer. The fact is, as the river travels north it moves farther from the Pacific Ocean and the Mountain range. As you follow the river North the rainfall totals are lower because of the distance from the ocean and the mountain range. Point in fact is the Templeton reporting station referenced in their petition is much closer to the ocean and mountain range than the Paso Robles Airport location. The reference to the west and east side of the river is not the climatic fact. A good example would be my Santa Margarita vineyard. If you were to talk to my neighbors on the east side of the Salinas River, (we each receive the 25 to 35 inches of rainfall referred to in the petition) they would confirm no difference in climatic conditions or soil types between our vineyard on the west and theirs on the east. The rainfall amount and climatic conditions are based on our proximity to the ocean and mountain range, not the proximity to the Salinas River

An example of the confusion to the consumer is used in the petition when it refers to the April 11, 2001, Tribune article, "Weather Worries Paso Growers". This describes the weather damage from the "cold" nights to vineyards on the west side of Paso Robles. Those nighttime temperatures vary based on the distance to the ocean and its warming influence. The temperatures on that night would have actually been warmer at my Santa Margarita Vineyard (proposed Westside) than my east of Templeton vineyard.

In conclusion, it is an oversimplification to base the viticultural differences in east/west properties solely on the location of the path of the Salinas River. An AVA should more accurately describe the origin of the wines to consumers and help them identify wines they may purchase. We are misleading the public by not using a more scientific approach. This could have long-range negative implications and potentially hinder future more conclusive and accurate AVA's within the Paso Robles AVA.

I would ask that you deny this confusing petition.

Respectfully

A handwritten signature in cursive script that reads "Paul Hoover".

Paul Hoover
Owner/Winemaker
Still Waters Vineyards & Winery.