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Director, Regulations and Ruling Division
Alcohol and Tobacco Tax and Trade Bureau
Attention: Notice No. 71
P.O. Box 14412, Washington D.C. 20044-4412
Fax 202-927-8525

Dear Director:

I am writing to urge the Regulations and Ruling Division of the TTB to create a new AVA in the Paso Robles California area, which should be named using the title word Westside, and which is more fully described in Notice No.71, Proposed Establishment of the Paso Robles Westside Viticultural Area.

I have been operating a winery and vineyard in the Paso Robles area for twelve years, and can state that the word Westside has from a time prior to 1995 up to the present time been used to identify the region described as follows:

The southern, western, and northern boundaries of the newly proposed Paso Robles AVA are the same as the boundaries of the existing Paso Robles AVA, and the eastern boundary of the newly proposed AVA is coextensive with that portion of the Salinas River traversing the existing Paso Robles AVA.

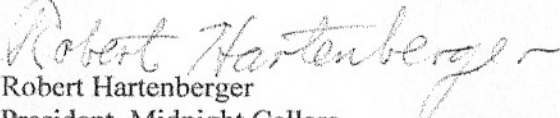
Before we moved to the Paso Robles area in 1995, we spoke with real estate agents, bed and breakfast proprietors, and winery and vineyard operators about different locations within the larger Paso Robles area. Everyone recognized the region, indented and described above, as the Paso Robles Westside or simply the Westside.

That recognition continues to the present time. Even as winery and vineyard operators discuss whether the newly proposed AVA should be established by the TTB, all participants in the discussion know what the other discussion participants are referring to when they use the term Westside. They are referring to the area bounded as described in the indented statement above.

There is good reason to use the term Westside to describe the above region and distinguish it from the rest of the current Paso Robles AVA. The climates of the two regions are different because of their proximity to and distance from the Pacific coast. The topographies of the two regions are different because of their proximity and separation from the foothills of the coast. The soils of the two regions are different from each other. And finally, the term Westside describes the area delineated above in a manner known to everyone.

For all the foregoing reasons, I respectfully urge the Director of the TTB to create a new AVA using the term Westside, said AVA having the boundaries set forth in the indented phraseology above and as more fully described in Notice No. 71.

Very truly yours,


Robert Hartenberger
President, Midnight Cellars