

EBERLE WINERY



March 23, 2007

Mr. Frank Foote, Director
Regulations and Rulings Division
Alcohol and Tobacco Tax and Trade Bureau
Attn: Notice No. 71
P.O. Box 14412
Washington, D.C. 20044-4412

Dear Mr. Foote,

I OPPOSE THE PROPOSED PASO ROBLES WESTSIDE AVA. My name is Gary Eberle and I have been growing grapes and making wine in Paso Robles since 1973. I went through a PhD program at U.C. Davis and moved to Paso Robles in May of 1973 at the suggestion of several of my professors at Davis. In 1982, myself and three other winemakers/growers got together and created what is now the Paso Robles AVA. When we created such a large and diverse AVA we knew that down the line there would be a movement to create smaller AVAs within the area. Our hope was that once we had more data and insight into the microclimates within the Paso Robles AVA that there would be a movement to create the new AVAs based on sound viticultural and scientific information.

Unfortunately, an application for a Paso Robles Westside AVA has been filed that is the antithesis of this. In the application they have taken from inside the present Paso Robles AVA the hottest and coolest vineyard sites, the wettest and driest vineyard sites, the highest and lowest vineyard sites and the area with the most fractured and diverse soil types. The boundaries of the Westside AVA are even more arbitrary than the original ones used to create the Paso Robles AVA in 1982/1983. There is no basis scientifically, viticulturally, historically or enologically for the Paso Robles Westside AVA to exist.

The science that has been used to file this petition has been cherry picked. The claim that the term 'Westside' has any historical use is false. Prior to 1973, there were no grapes east of Paso Robles and it was not until the last 15 to 20 years that the terms east and Westside started to appear. There was no east side to Paso Robles. Essentially, all of Paso Robles was on the west side of the river. Prior to that time the areas around Paso Robles were referred to as Adelaide District, Estrella District, El Pomar District, Geneseo District, Creston Area, Templeton, San Miguel and Shandon. I lived in Paso Robles at least a decade before I ever heard the term Westside used and that was by realtors.

Please take the time to talk to Dr. Rice at Cal Poly and Dr. Fisk at the Geology Department at U.C. Davis and they will tell you that there is nothing homogenous about the soils on the Westside. The soils within the proposed Westside area are a patchwork quilt of soil types and the climate, rainfall, elevation and history are as diverse.

The Paso Robles Westside AVA proposal is ill conceived and wrong. The only thing that is unique about the proposed Westside application is that there is nothing unique about the appellation.

Yours truly,

W. Gary Eberle
General Partner/Enologist