



Director Regulations and Rulings Division
Alcohol and Tobacco Tax and Trade Bureau
Attn Notice No. 71
P.O. Box 144412
Washington DC 20044-4412
Fax # 202 927 8525

April 6, 2007

This comment is submitted in OPPOSITION to the petition, proposing establishment of a Paso Robles Westside Viticultural Area.

I have lived in San Luis Obispo County for 12 years and have developed and currently farm approximately 200 acres of vineyards in three separate and distinctly different locations within the Paso Robles AVA. The winery I founded and operate sources it's grapes from my own vineyards as well as from other Paso Robles vineyards, both east and west of the Salinas River.

The proposition of a Paso Robles Westside Viticultural Area (PRWVA) is misdescriptive; it inadequately simplifies and does not accurately portray the diversity of our area. The petition goes to great length in effort to give credence to the proposition of east and west as it applies to our area when in fact these descriptions are only used when seeking to simplify and to speak of the area in general terms. The Paso Robles industry vernacular is much more eloquent and illustrative. When referring to grape growing areas one is more likely to hear names such as; the San Miguel area, the Adelaida area, Willow Creek, Templeton, the Estrella area, Santa Margerita, the Creston area, to name a few. These are the place names we use every day that properly identify the growing areas within the Paso Robles AVA.

The proposition of a PRWVA does not present a viticulturally distinct area. Using the Salinas River to separate topography, soils, and climate simply does not work. From a topographic viewpoint similar geographies and soils with the same bedrock types, landform types, ages, and hydrology occur on both sides of the river. The climate is by no means homogeneous as the proposed area includes the warmest, San Miguel area, and the coolest, Santa Margarita area, to be found in Paso Robles. In addition the Salinas River is not a barrier to the maritime influence that many eastern growing areas enjoy, East Templeton and El Pomar, making them cooler than a goodly amount of the area found predominately west of the river, San Miguel and Adelaida.

The proposition of a PRWVA does not present differentiation of an area with "more advantageous growing conditions to the west of the Salinas River." The areas west of the Salinas River do not have a monopoly on advantageous growing conditions. These same conditions and other varied and equally advantageous growing conditions are to be found across the Paso Robles AVA.

In summary, the proposition of a PRWVA, is misdescriptive and it does not present a viticulturally distinct area with "more advantageous growing conditions."

I respectfully request this petition be denied.

Sincerely,

A handwritten signature in cursive script that reads "Robert L. Hall".

Robert L. Hall, Owner
Robert Hall Winery
3443 Mill Road
Paso Robles, CA 93446