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April 4, 2007

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

Dear Mr. Foote:

Subject: Paso Robles Westside AVA Petition (Notice No. 71)

For 32 years I have been involved in operational meteorology and since 1985, as an American Meteorological Society Certified Consulting Meteorologist, I have focused on weather information services for agriculture in California. These weather information services include field monitoring with automated weather stations and custom weather forecasting to assist growers in all aspects of their farming operations where weather is a factor.

In 1993, I was contacted by the wine grape growers in the Paso Robles region of California. The growers realized their region possessed many different microclimates. They saw a need to monitor the weather in the distinctly different growing regions. During the mid 1990's I worked with the wine grape growers association in Paso Robles and led a team of meteorologists and physical scientists in establishing a network of automated weather stations in the region.

To characterize the different weather regimes in the area automated weather stations were installed in vineyards in the higher terrain of the Santa Lucia Mountain Range, northeast of the city of Paso Robles near the airport, in the far eastern growing region near the area of Shandon and a station was established between the town of Templeton and Paso Robles to the west of Highway 101 along Highway 46 in the Templeton Gap area.

The automated weather stations in the vineyards provide both real-time and historical weather information characterizing the region. The next logical step for the grower's association was to utilize the localized weather information to provide detailed weather forecasts for the growers in the region. Our team of meteorologists in Chico, California were contracted to provide daily weather forecasting services to the wine grape growers during the growing season. This led to year-round weather forecasting services to support vineyard cultural practices outside the growing season. The automated weather stations provide the key information to make a localized weather forecast by supplying real-time and historical data to initialize and verify each forecast.

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Other growers in the region soon realized the value and importance of monitoring the weather in their vineyards and additional automated weather stations have been established over the years to characterize other microclimates in the area. Some of these automated weather stations have been incorporated in the weather forecasting service that our team of meteorologists continues to utilize in producing daily weather forecasts for the Paso Robles wine grape growing region.

Recently it has been brought to my attention that a petition has been filed with the Tax and Trade Bureau to establish the Paso Robles Westside Viticultural Area. It is understood that the eastern most boundary of this proposed viticultural area is the Salinas River, the northern most boundary is north of San Miguel, and the southern most boundary is the Santa Margarita Ranch. Having worked with localized vineyard weather information and having provided a detailed weather forecasting service for the Paso Robles growing region since the mid-1990's it is my opinion that: (1) the Salinas River is not a suitable boundary to describe the many different microclimates found in the Paso Robles viticultural area, (2) the viticultural area extends too far north and too far south to have any viticultural uniformity.

The Salinas River cuts through several different microclimate growing regions. In addition, to the west of the Salinas River there are distinct microclimate regions as one moves from north to south and east to west through the proposed Paso Robles Westside viticultural area.

When looking at different meteorological parameters the differences within the proposed Paso Robles Westside viticultural area become apparent. To the north, in the San Miguel region the seasonal rainfall is 11 to 12 inches per year. Further south near the town of Templeton rainfall is 19 to 20 inches and in the far south of the proposed Westside viticultural area in the Santa Margarita region rainfall reaches 27 to 28 inches per year. Not only does the rainfall vary greatly from north to south the rainfall in the proposed Westside region varies east to west. Near the town of Paso Robles, west of the Salinas River the annual rainfall is 14 to 15 inches. Traveling further west into the higher elevations of the Santa Lucia Range the rainfall will average 25 inches per year.

Air temperature also varies widely throughout the proposed Paso Robles Westside viticultural area. Having monitored the local weather with automated weather stations in the vineyards as well as providing daily weather forecasting for the region for more than ten years the temperature differences have become quite evident. During the growing season the San Miguel region is warmer than the higher elevations in the Santa Lucia's and the Templeton Gap growing region. Consequently the number of growing degree-days is higher in the San Miguel region. While the growing degree-days are somewhat similar in the Templeton Gap area and the vineyards higher in the Santa Lucia range the temperatures are not necessarily similar. During periods of a deep marine layer along the

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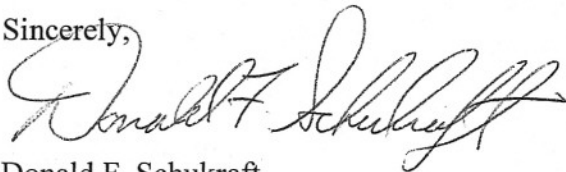
central coast of California the Templeton Gap region is subjected to marine air intrusion through the Highway 46 corridor and wind gaps in the Santa Lucia Range.

Consequently, the daytime high temperatures in the Templeton Gap region may be similar to other growing regions west of the Salinas River, however; the cooler marine air entering the Templeton Gap region from the west causes the daytime temperatures to cool more rapidly during the afternoon and evening hours than other areas giving this region a different microclimate from the surrounding areas.

Wind speed is another meteorological parameter that varies across the proposed Westside viticultural area resulting in climatic differences. To the north, the San Miguel district is heavily influenced by the Salinas Valley River Basin resulting in higher winds that are predominantly from the WNW and NW. The secondary wind direction component in this region is from the S and SSE following the river basin. The winds in this region contrast greatly from the winds observed in the Templeton Gap region where predominantly cool and moist winds enter the region from the SW and WSW through gaps in the San Lucia Range.

Having monitored the weather conditions and provided daily weather forecasts for the Paso Robles wine growing region since the mid-1990's it is evident, based on climatic reasons, that the proposed Paso Robles Westside AVA, with the eastern most boundary being the Salinas River and with nearly 30 miles from the northern most boundary to the southern most boundary, is not supported by the observed weather in the region. The weather data supports multiple viticultural areas within the proposed Paso Robles Westside AVA.

Sincerely,



Donald F. Schukraft
Certified Consulting Meteorologist
CEO
Western Weather Group, LLC