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From: John Backer [mailto:jjibacker@wildblue.net]

Sent: Sunday, April 15, 2007 10:53 AM

To: Rulemaking, TTB

Subject: 'TTB Notice No. 71'

name=John Backer

name=August Ridge Vineyards

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Comments=Comments regarding Paso Robles Westside AVA Petition

The proposed Paso Robles Westside AVA tremendously oversimplifies the very complex climate, soils and cultural make up of the larger Paso Robles AVA. The Westside AVA with its proposed boundaries is not characterized by homogenous soil types, terrain features or climactic conditions nor is it particularly unique when compared to the surrounding areas within the existing Paso Robles AVA.

For example, the average temperatures within the proposed area are not uniformly cooler than the areas east of the Salinas River. The maritime cooling influences of what is called the Templeton Gap extends east of the Salinas River beyond the town of Templeton and out to the Huer Huero River valley. My vineyard, located 10 miles east of the Salinas River, routinely experiences a 50 degree diurnal temperature swing and by degree day calculation is in the second coolest area of the Paso Robles AVA.

Terrain presents a similar problem as the structure of the area does not end at the Salinas River but continues into the hilly country that extends east of the river. Once again, from my vineyard I have a 360 degree view of hills, ridgelines and outcrops that more closely resemble the terrain in the southern portion of the proposed Westside AVA than the terrain described as typical of the 'Eastside' presented in the petition.

Dividing the current Paso Robles AVA using the Salinas River as a guide may match the regional shorthand in use by residents of the area. The Salinas River in itself is not, however, a demarcation of adequate significance to define an AVA. If used as such it will create confusion for the consumer based from the resulting marketing of claimed quality attributes that do not correlate to the boundaries of this proposed Paso Robles Westside AVA.

In summary, the petition is an over simplification of a very diverse viticulture area. A more thorough study of the viticulturally significant characteristics of the overall area is necessary in order to gain the benefits that are intended when a new AVA is established.

I ask that this petition be denied.

Regards,

John Backer
August Ridge Vineyards