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From: John Crossland [mailto:crossland@vineyardpro.com]

Sent: Monday, April 16, 2007 4:08 PM

To: Rulemaking, TTB

Subject: 'TTB Notice No. 71'

name=John Crossland

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Comments=April 16, 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., 2004-4412

Re: Comment, Notice No. 71

Dear Mr. Foote:

I wish to comment in opposition to the Paso Robles Westside Viticultural Area petition. I am a resident of rural Paso Robles, own, reside-on and farm 170 acres of vineyard within the Paso Robles Viticultural Area, own Vineyard Professional Services, Inc and have been a Viticulturalist and Vineyard Manager for thirty-five years. As a vineyard manager, I directed the development of a 150 acre vineyard east of Paso Robles in the mid 1970s, giving me over thirty years of vineyard involvement in the area.

My business, Vineyard Professional Services, provides vineyard management and technical consulting to vineyard and winery owners as well as qualifying sites for vineyards throughout the Paso Robles AVA. Our experienced staff includes Viticulturalists as well as a Certified Soil Scientist. We have provided site evaluation, vineyard feasibility reports, soils classifying, mapping and elemental analysis, vineyard layout, planting and/or management services on fifty properties over the last ten years. These properties total over 4500 vineyard acres located both East and West of the Salinas River.

Our experience throughout the AVA leads us to believe that the Paso Robles Westside petition does not meet the requirements specified in TTB regulations:

1. The "Evidence" that the proposed viticultural area is locally and nationally known does not support such knowledge for the broad area applied for. There is lack of supporting evidence for areas west of the Salinas River south of Templeton as being associated as Westside Paso Robles.
2. We believe regulations require that AVAs created within a larger AVA should be unique in geographical features as to distinguish the proposed area from surrounding areas. When one accurately reviews climate, soils and geographic features of the proposed Westside Paso Robles AVA, it is found that all of these perimeters vary greatly within the boundary, dispelling overall uniqueness. Virtually all of the soil series (as mapped by the USDA) in the proposed AVA are also found East of the Salinas River. There are multiple differences in rainfall, temperatures and elevations within the proposed boundaries that effect wine and grape uniqueness.
3. The petition lacks sufficient scientific evidence. This can be concluded by reading comment 94 in which Thomas Rice, Ph.D. states that some of his work was inaccurately quoted in the petition and erroneous conclusions were drawn by the petitioner.

This petition does not meet the guidelines and as such should be turned down. Thank you for considering my concerns.

John Crossland