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From: The WineYard at Steinbeck Vineyards

[mailto:TheWineYard@starband.net] Sent: Thursday, April 19, 2007 10:34 AM

To: Rulemaking, TTB

Subject: 'TTB Notice No. 71'

name=Cynthia M. Newkirk
name=Steinbeck Vineyards
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Comments=Cynthia M. Newkirk
5940 Union Road
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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

April 18, 2007

Re: I oppose the Paso Robles Westside application.

I am a fifth generation Paso Robles wine grower. I have served on the Paso Robles AVA committee since its inception. I support the work of the AVA Committee and the 11 applications we have submitted to the TTB for approval.

The proposed Paso Robles Westside application should not be approved because it would be confusing to consumers on various fronts:

- 1) The name "Westside" by nature implies "Eastside," a division that is not helpful to wineries, growers or consumers. Every city, town, or area has a Westside and an Eastside, generally divided by an easily identified mark, not based in soil science, climate data, or growing conditions.
- 2) The current Paso Robles AVA was developed 20+ years ago to distinguish ourselves from the Central Coast AVA. The intent of that group was to include every grape growing area north of the San Luis grade on Hwy 101 north to the

Monterey County line. The lines extended East into all viticultural areas. The Paso Robles Westside application mirrors that twenty-year-old effort. The proposed area is large and undefined; the proposed area encompasses very different and distinct viticultural areas; and the proposed area uses the name "Paso Robles" with only a descriptive word to set it apart from the current Paso Robles AVA.

3) The "Paso Robles Westside" application uses the Salinas River as its eastern boundary. Soils on either side of the river to the north in San Miguel and to the south of the city of Paso Robles are the same soil types and there is no viticultural distinction in those same areas on either side of the Salinas River bed.

The proposed Paso Robles Westside application is not supported by the entire wine growing and wine making community within its boundaries:

- 1) Of the original 21 signers of the Paso Robles Westside application, at least three have officially withdrawn their support of the application.
- 2) Fifteen wineries and growers representing 1,500 plus acres located within the proposed Paso Robles Westside area have served on the Paso Robles AVA committee.

Please deny the Paso Robles Westside application.

Respectfully submitted,

Cynthia M. Newkirk