

Sereno Vista Vineyards

April 23, 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

Comment 154

Dear Mr. Foote:

I am opposed to Notice No. 71, Proposed Establishment of the Paso Robles Westside AVA.

Paso Robles is the largest AVA in California other than what I call 'regional' AVA's such as "Central Coast AVA" or "San Francisco Bay AVA". Because of our great size, over 600,000 acres, grapes grown in Paso Robles and naturally our wines reflect the great diversity found in an area of this size. In our marketing and promotional materials, we embrace and celebrate the diversity of our region. We successfully grow a wide range of varietals from whites to Pinot Noir, to Bordeaux and Rhone varietals, and to other full-bodied reds. Consumers also embrace our diversity. This is evidenced by the rapid growth in the number of wineries in Paso Robles over the last few years. The number of bonded wineries in Paso Robles is approaching 200.

Diversity in Paso Robles AVA is demonstrated in many ways. We have cool areas (Winkler Region II) to warm areas (Winkler Region IV). We have sandy river bottom soils, heavy clay soils, soils rich in calcareous rock and everything in between. Paso Robles AVA annual rainfall is from over 30 to 40 inches a year, in the wet areas. In much dryer areas, the annual rainfall is less than 10 inches. Topography, Paso Robles AVA has steep hills, rolling hills, valleys, river bottoms, benches and flat lands.

The Proposed Paso Robles Westside AVA will only confuse consumers. Why? Because the Proposed Paso Robles Westside AVA, as it is defined, is also large and diverse and does not offer the consumer any insight into why the 'Westside' is any different from the current Paso Robles AVA. The Proposed Paso Robles Westside AVA is warm (San Miguel); it's cool (Highway 46W); it's wet (Santa Margarita); and it's very dry (San Miguel). Soils are also varied throughout. The only scientific data I can see that supports a difference in the Westside is that it is somewhat hillier within the Proposed Paso Robles Westside AVA.

This leads to my next point, Westside as a name. It's a geographical reference. It's not the name of anything historical about the area. There's no school district, Indian Tribe, Spanish Land Grant, creek bed, mountain top or anything else named 'Westside'. It's just a vague notion of a place. By the use of this type of name, will the consumer then wonder about the 'Northside', the 'Southside', or the 'Eastsides'?

I believe the use of the Salinas River, as the dividing line between the rest of the existing Paso Robles AVA, is a **major flaw** in the Proposed Paso Robles Westside AVA application. It is a geo-political boundary and has little to do with changes in viticulturally significant growing factors. It makes about as much sense as using the Mason-Dixon Line to differentiate viticultural growing regions between Maryland and Pennsylvania. The petitioners are using an arbitrary line to divide the existing Paso Robles AVA.

Are there great differences between areas within the existing Paso Robles AVA? Absolutely! I farm my vineyard, six miles east of the Town of Paso Robles and it would be foolish for me to try to grow Pinot Noir; it's too warm. Conversely, my Pinot friends that farm on Highway 46W are very successful with that varietal rather than trying to grow Cabernet Sauvignon. I believe the Proposed Paso Robles Westside AVA application does very little to capture the differences within the existing Paso Robles AVA.

A scientifically based approach that tries to define new AVA's that are homogenous within themselves and distinct from their neighbors is a better approach. AVA boundaries should be based on science that relates to viticultural factors. The Paso Robles AVA Committee, of which I am a member, has taken a comprehensive approach by considering the entire Paso Robles Area and then defining multiple AVA's that are different from their neighboring AVA's.

I believe that the TTB has historically considered each AVA application separately unto itself. However, I would submit to you that the Lodi model of doing an entire region at one time yields a much cleaner and more consistent solution and will ultimately benefit the consumer in understanding the origins of the wine they consume.

I urge you to **reject Notice No. 71, Proposed Establishment of the Paso Robles Westside AVA** for two reasons. First, the application as submitted is flawed; it contains very little science that would support why this area is viticulturally different and will only confuse consumers. Secondly, the Paso Robles AVA Committee is about to complete a comprehensive submittal to the TTB which defines 11 new AVA's within the Paso Robles area. I understand that most of these new AVA's have already been submitted to the TTB with the remaining 4 AVA's to be submitted within days. I believe that this plan for 11 AVA's is a superior solution for Paso Robles; it is scientifically based and it will afford each grower the opportunity to develop and promote the uniqueness of his or her local area.

I would like to briefly summarize my involvement in the wine industry. I farm 70 acres of grapes just off of Highway 46E, six miles east of Paso Robles. I am on the Board of Directors of the Paso Robles Wine Country Alliance, and I am a member of CAWG, Central Coast Vineyard Team and a member of the Independent Grape Growers of Paso Robles.

Thank you for considering my comments.

Regards,

A handwritten signature in black ink, appearing to read "Jerry Reaugh". The signature is fluid and cursive, with the first name "Jerry" being more prominent than the last name "Reaugh".

Jerry Reaugh
Owner