



COMPANY

815 8th Street - P.O. Box 240
Hoquiam, Washington 98550-0240
Phone (360) 533-2410 • FAX (360) 533-4811

April 17, 2007

Mr. Frank Foot, Director
Regulations and Rulings Division
Alcohol and Tobacco Tax and Trade Bureau
P.O. Box 14412
Washington D.C., 20044-4412

Subject: Notice No. 71 – Proposed Paso Robles Westside Viticultural Area

Dear Mr. Foot,

As an individual and on behalf of my company, I am writing you today to express our **OPPOSITION** to the Paso Robles Westside Viticultural Area Application (PRWVA). Our family currently farms approximately 1,200 acres of vineyards east of Paso Robles. We also own and operate a winery in Paso Robles.

We believe that the PRWVA is deeply flawed. It is not based on readily available science, which, of course, is one of the key objectives of the TTB's AVA process. Rather, the PRWVA appears to be rooted in narrowly defined marketing objectives, potentially, at the expense of the entire Paso Robles wine community. Simply put, the PRWVA is a "Win-Lose" proposal. We strongly believe the process currently underway with the Paso Robles AVA Committee is a "Win-Win" proposal that actually accomplishes what the authors of the PRWVA claim they seek but fail to achieve in their proposal. The Paso Robles AVA Committee seeks to go far beyond the PRWVA proposal and attempts to shape the current Paso Robles AVA into eleven coherent AVAs, five of which, happen to be located in the proposed PRWVA.

I think it is fair to say that most wineries try to describe their wines as based on terroir or as having a "sense of place." I believe the authors of the PRWVA attempt to make this argument through the use of generalized scientific and marketing data but ultimately the proposal falls short due to the sheer size and the heterogeneous nature of the proposed AVA. The more specific proposal of the Paso Robles AVA Committee proposal would break the proposed "Westside" into five smaller AVA: Adelaida District; Templeton Gap; Paso Robles Willow Creek District; Santa Margarita Ranch; and San Miguel. The Paso Robles AVA Committee also goes beyond that by also seeking six additional AVAs located in the eastern portion of the current Paso Robles AVA.

Based on scientific data compiled by Professor Deborah Elliott-Fisk from U.C. Davis for the Paso Robles AVA Committee, it is evident there is as much variation north to south in Paso Robles as there is east to west based on geologic formations, soils, and climate. That is why they are proposing 11 AVAs based on numerous scientific data points not based solely on where one sits relative to Highway 101 or the Channel of the Salinas River.

The PRWVA application would also have you believe the proposed AVA is entirely mountainous; has singularly unique soils; and has unique weather as opposed to eastern Paso Robles. This is not supported by the scientific facts and I urge you to look at Professor Elliott-Fisk's work which is publicly available. The northern part of their proposed AVA in the San Miguel area is among the hottest areas in Paso Robles, while the southern most portion of their proposed AVA, located in the Santa Margarita area, is among the coolest areas in entire area with the most rainfall. This is supported by current scientific data collected from numerous weather stations, as well as, combing through historical records throughout Paso Robles. Another area where the PRWVA application is misleading is by including quotes in the application that give a false impression as to the geography of Paso Robles. It claims how the eastside of Paso Robles is "flat as a billiard table," while the Westside is mountainous. This is much too broad a generalization as there are both mountainous and flat areas alike from east to west and north to south in Paso Robles. As an example, our vineyard is generally characterized by moderate to steep terrain. The elevation in our vineyard varies from 400 feet to 1000 feet and a significant portion of our vineyards are on steeply terraced hillsides.

In conclusion, we feel the proposed PRWVA covers too large a geographic area. It does not appear to be based on the best available science and makes broad generalizations about Paso Robles that are not supported and potentially misleading. We respectfully urge you to reject this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Middleton", with a long horizontal flourish extending to the right.

Richard Middleton, President
Anderson & Middleton Company