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Ranch Address: 6961 Estrella Road
San Miguel, Ca 93451

May 7, 2007

Attn: Mary A. Wood
TTB Alcohol and Tobacco Tax and Trade Bureau

Re: Comments previously submitted on Notice 71 =
Proposed Establishment of the Paso Robles Westside Viticultural Area

My husband, Michael Drucker, and I would like to comment in opposition to the approval of the proposed Paso Robles Westside Viticultural Area. We are land owners in Paso Robles and also in San Miguel and have been in the area for more than 16 years. We are actually involved in growing grapes at our two vineyards and in producing wine and have direct knowledge of the areas. We are also aware of the other proposal for the 11 sub AVA s for this general area.

There are unique differences in the climates and land formations, rainfall, and soils in the very large proposed Paso Robles West AVA 666,000 acres. The proposal includes the very wettest areas and also San Miguel, which we are familiar with, which is the driest. The soil types are by no means unique to that area and do not clearly define its distinctness. I do not believe you will find a single soil series map by the USDA that, in fact, shows the soils in this area to be uniquely located over there and not also on the east side. There seemed to be a rather arbitrary decision as to the boundaries and borders, without clear regard to the proper topography and land form distinctness of the sub-areas included in this large proposal. I do not believe the Salinas River to be an appropriate dividing line based on the scientific criteria of climate, elevation, topography, soils, geology and landforms. This is a wrong designation and certainly does not coincide with any local, community, or national name recognition.

On the issue of name recognition Westside has never been used locally, in the written press, or by realtors to include the southern portion of the proposed large AVA, such as the City of Atascadero or the town of Santa Margarita or to portions of San Miguel. In fact there is a real desire to have the designation PASO ROBLES AVA associated with all these areas, but not what appears to be from this proposal a marketing ploy to use the Westside designation. This would be inappropriate if it is not supported by scientific facts and also name recognition.

The proposed Westside area is very varied. There are sub-areas with winds, variable growing degree days, higher and lower temperatures, and certainly different terrains (very flat, verses hilly more rugged terrain). When we speak of a viticulturally distinct area the wines made from those grapes should represent this uniqueness to the

consumers. It does not with such diversity. The proximity to the maritime influences will still be variable within this proposed AVA due to the various heights of the mountain and hill ranges and this influences the grapes and of course the final wine products.

On our vineyards we see variable vegetation according to the height and depth of the land forms. However, there is no vegetation form that is unique to the proposed Westside AVA and, once again, no unique soil types. In addition, the same growing conditions to the west of the Salinas River in our observation exists on the east side and also in San Miguel, east of Airport Road where one of our two vineyards is located. Hydrology does vary throughout the Paso Robles AVA and, in fact, I agree that there are distinct smaller sub-AVA s which reflect the more unique features which vary in the general region. These can be defined and supported by scientific, cultural, climatic, geologic, climactic and hydrologic data; my husband and I both support the proposed sub-AVA s which your committee will soon be reviewing.

To summarize, we are in opposition to the approval of the proposed Paso Robles Westside AVA because:

1. It is too large and diverse.
2. The climactic variation is too great.
3. There really is no historical, local or regional name evidence to support its propose boundaries
4. It does not contain viticultural distinctness, with inappropriate dividing lines
5. The soils are not unique to the boundary areas
6. Elevations are the same for vineyards both to the east and also to the west of the Salinas River
7. Growing conditions are shared on both the east side and the west side

Please consider the scientific facts as well as the lack of name recognition and deny this proposal. We believe the public will best be served by an alternate set of proposals which you are in receipt of which can clarify those sub areas within the AVA of Paso Robles that will, indeed, have uniqueness and distinctness.

. If any questions I can be reached at 818-702-9962 or my cell 818-2669977.
My views expressed here are shared by my husband, Michael Drucker as well.

Sincerely,



Serena Friedman, M.D.

Michael Drucker, M.D.

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