## CONSIDERATIONS OF CLIMATE AND GEOLOGY WARRANT THE ESTABLISHMENT OF A NEW AVA WHICH EXISTS ENTIRELY WITHIN AN EXISTING AVA

The proposed Rancho Guejito AVA would exist entirely within the existing South Coast AVA. The South Coast AVA is located in the State of California encompassing grapegrowing regions in five Southern California counties: Los Angeles, Orange, Riverside, San Bernardino, and San Diego. It runs along the Pacific coastline from Ventura County in the north and the Mexican border in the south (27 CFR 9.104). This large appellation includes a number of smaller sub-appellations (Ramona Valley, 27 CFR 9.191; San Pasqual Valley, 27 CFR 9.25; and Temecula Valley, 27 CFR 9.50) all sharing the common ecology trait of having warm weather moderated by cooling coastal influences from the Pacific Ocean.

The proposed Rancho Guejito AVA is sufficiently distinctive from the South Coast AVA in that, while their respective *climates* are sufficiently similar, at the same time their respective *geologies* are significantly different.

Climate. The South Coast's latitude (from 32°N to 34°N) places it further south than any of Europe's wine regions, and closer to those of north Africa. The Pacific Ocean provides cooling influences to this hot, dry part of California, and viticulture within the South Coast does not usually reach further inland than where the ocean breezes do. All of the AVAs in the South Coast, including the proposed Rancho Guejito AVA, rely on the Pacific Ocean as a temperature modifier, providing cool, moist, marine air to roll into the South Coast's valleys in the mornings where it condenses to form mist, preparing the vines for hot summer afternoons.

## Geology.

There is a wide array of different soil types in the South Coast AVA. It is common to find rocky, shale and granite soils in the South Coast's mountainous areas. On the flat plains, however,

there is a variety of sandier and clay soil types.

As of its formation in 1985, the South Coast AVA had over 3,000 acres planted with wine grapes. This large area has been divided into smaller sub-appellations largely to take account of the differences in soil throughout the South Coast. As shown in the Petition herein, the proposed Rancho Guejito AVA has a variety of soil types due to its diverse topography which distinguish it not only from its neighboring San Pasqual Valley and Ramona Valley AVAs, but also from the South Coast AVA as a whole (Petition, Sec. III, Soils, pp. 24-28).