

From the Desk of
Dave Carter

March 21, 2010

Bureau of Competition
FTC Office of the Secretary
600 Pennsylvania Ave., NW
Washington, D.C. 20580

To Whom It May Concern,

I am writing to express my full support for the offer that has been presented by Mark Retzloff and Barney Feinblum to purchase the Whole Foods Market store located at 1651 Broadway in Boulder, CO.

I am not only a consumer for natural foods, but have worked over the past few decades with farmers and ranchers who view the natural foods marketplace as an important channel for their products. Independent farmers and ranchers have suffered over the past decades as the mainstream processing and marketing outlets have consolidated into a few, larger players. The natural food channel, with its dispersed and diversified market outlets, represented a viable alternative to that consolidation.

That is why I was among those who were pleased in late 2007 when the Federal Trade Commission expressed its concern that the acquisition of Wild Oats by Whole Foods would represent unhealthy consolidation in the natural foods marketplace.

Accordingly, the final regulatory approval of the acquisition included a requirement that Whole Foods sell 31 existing Wild Oats locations. It seems obvious that the motivation behind that requirement was to promote an opportunity for continued competition in the marketplace.

The proposal by Mr. Retzloff and Mr. Feinblum to purchase the property at 1651 Broadway, along with the Alfalfa's intellectual property, represents the best opportunity to assure that type of competition in the Boulder marketplace. Mr. Retzloff and Mr. Feinblum are pioneers in the natural food retail sector, and possess the unique capacity to establish the new Alfalfa's as a viable competitive alternative to the dominant presence of Whole Foods.

Their purchase of the physical and intellectual property, and the resurrection of Alfalfa's Market in Boulder, will provide consumers with competitive alternatives, and will provide producers of organic and natural produce, dairy and meat products with the opportunity for continued open market access.

Again, I strongly support the purchase proposal submitted by Mr. Retzloff and Mr. Feinblum.

Sincerely,



Dave Carter
Executive Director, National Bison Association
Former Chair, USDA National Organic Standards Board