

April 20, 2006

TO: Virginia Lasky
Department of Toxic Substances Control
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TO: Gloria Sciara, Project Manager
City of Santa Clara, Planning Division
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RE: BAREC/Santa Clara Gardens RAW and EIR Comments

I am the Executive Director of the Sustainable Studies Institute in Oregon. The Institute is associated with Soil Foodweb, Inc. an internationally known as a company that remediates chemically treated soil by adding microorganisms to the soil. We specialize in cleaning up agricultural sites many of which are worse than what is found in the BAREC soils. We have worked with many governmental agencies such as the USDA, EPA, NRCS, and Western SARE. Our organization has done a great deal of this work on the agricultural lands of Sonoma, Napa, and Monterey counties especially for organic vineyards and strawberry growers. Removing Dieldrin and Arsenic are not problems for us at any depth. Our methods utilize living organisms that will follow the root structures of plants down to any depth the plant can reach. We have demonstrated time and again that compaction layers that hit over 300psi in the first few inches can be taken care of by these methods.

No matter what the future of the BAREC land becomes it is clear that your process of removing the soil offsite will not clean up the site as completely and effectively as our process. It is vital if children and seniors use the BAREC 17 acres in the future that the land be remediated thoroughly and not partially, as is what we are seeing in your RAW Report. The costs for using this natural process are far less than for removing the soil off site as the RAW is suggesting. We also have several local Peninsula people who have been trained in our laboratories with our methods. They are located within 30 minutes of BAREC.

For several years our founder, Dr. Elaine Ingham, has been talking to the landscape and agricultural communities in and near Santa Clara about the BAREC situation. She has expressed an interest in helping clean it up properly for future generations. There is a great need for a biological soil-testing laboratory in California and this clean-up process could be the beginning of a new industry and new jobs for the City of Santa Clara.

We hope you will consider this wonderful alternative to remediate the BAREC soil.

Sincerely yours,

Joseph J. Whaley B.S., M.Ed.
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