

From: robertc@harpub.com [REDACTED]
Sent: Monday, July 09, 2012 4:12 PM
To: Wessel, Ann (ECY)
Subject: formal comment on the proposed Dungeness Water Management Rule

Dr. Robert N. Crittenden
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July 9, 2012

Regarding: Formal Comment on the Proposed Dungeness Water Management Rule

Dear Ann,

Please consider this as a formal comment. Thank you.

This comment deals with the egregious impacts that the proposed rule may be expected to have on me and my investment-backed business interests. I also address several other issues.

I am a biometrician and do consulting. That has occasionally included medical questions. --- Several years ago, I was asked by a local physician, why there was such a high cancer rate in Clallam County. She showed me, among other things, the blood and hair sample data for her patients. Most of them had very high levels of uranium. I also talked with several cancer patients. One particularly relevant fact that emerged was that when the patients stopped buying food at the grocery stores, but grew it in their own gardens, their cancer never recurred. Next, I spent several days at the medical school's library at the University of Washington. What I found was essentially complete agreement on what the non-military source of the uranium was. They said that it was added to fertilizer. That was how it got into the food supply.

The US Toxic Substances Act allows the EPA to certify alternative uses for industrial wastes. In particular, the uranium mining and manufacturing industry has a lot of contaminated phosphoric acid they need to dispose of. Uranium is soluble in phosphoric acid and that is how they extract it from the ore. The EPA allows them to add it to fertilizer. It is an excellent source of phosphorus, a broad-spectrum insecticide, and also increases the shelf-life of vegetables. They even certify it as "organic." The Washington State Department of Ecology, also, allows this to happen.

I bought a modern Geiger counter and measured radiation levels in foods that I bought in the local grocery stores. Almost all of them were significantly above the background rate.

However, they were only moderately radioactive, mostly around one-and-a-half to two times the background rate.

What I did, as my personal response to this knowledge, was buy a piece of property, with good soil and irrigation rights. My intention has been to grow vegetables, dairy and meat, that are free from that insidious source of contamination, and sell them, particularly to local cancer patients. I have spent the last few years developing the land, improving the soil, and learning how to grow these products.

Now, this proposed rule might be used to prevent me from doing, what I have invested in and spent several years of my life developing.

However, the worst impact is that PUD #1 intends to build a sewage treatment facility only a few hundred yards from me and infuse their treated water into the aquifer that my well goes into.

The department of ecology would not allow them to infuse it into the creek, apparently because they are concerned of harm it might do to the fish. They insist that they use it to recharge the aquifer, instead.

However, the sewage treatment that is planned doesn't remove heavy metals (including uranium), some prescription drugs, viral spores, micoplasma, nor various other harmful micro-organisms. Furthermore, this is a huge point source that can be expected to eventually contaminate all three of the aquifers in the local area.

That would make everything I have worked for and invested in futile.--- During the irrigation season, I primarily use irrigation water but, after the season ends, I use well water to irrigate both my personal and commercial gardens. I also use it for stock watering and domestic uses. That well water during the late summer and fall is essential to maintaining a fall and winter garden. That is when fresh pure vegetables are in short supply.

Furthermore, that insidious plan is based on the aquifer recharge study. That was done conditional upon the parameters that were estimated using the static recharge study of the 2008 groundwater flow model. As I have stated in a previous comment, the static calibration study has zero degrees of freedom and infinite variances and, consequently, the aquifer recharge study, which was done conditional upon it, inherits those infinite variances. Thus, neither of them are scientifically valid, they are both arbitrary and to me, they are invidious.

Thus, they violate my civil rights.

In addition, I find that the proposed rule, by controlling new uses, is far too intrusive into private life. It makes too many decisions for individuals and for how they may use their private property.

The name for this is "totalitarian." That is certainly unnecessary, it can be expected to remove much of the pleasure of living, and it can not reasonably be expected to advance the legitimate objectives of the rule. Furthermore, it is entirely contrary to our legal traditions and heritage.

Another issue, that I will address in closing, is that the Department has not made their case. That is, they have not presented a comprehensive report that tells exactly how the various reports and

studies support their proposed rule. They leave the public to guess what their reasoning might be. The Department really needs to make their case.

Sincerely
Dr. Robert N. Crittenden
July 9, 2012