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To: [David Abelson](#)
Subject: Lynn Segal statement open comment 26 Oct.
Date: Monday, October 26, 2020 9:12:16 AM

Per Deven's request for my statement to be sent to RFSC.

Lynn's open comment to RFSC on Regulatory capture (RC)

I've been following RF for decades now. Before the DOE sponsored ones, the Rocky Flats Citizens Advisory Board and the Local Impacts Initiative resulted in the RF Future Site Use Working Group. The citizens intent was manifest in these groups, but DOE, state and fed. regulators produced the RF Cleanup Agreement (RFCA) without public input and it was adopted against strong public opposition. In 1996, it allowed 651 pc/g in soil, and was not reduced until 2000 to 34 pc/g. Compare this with other waste sites allowing 40, 14, 34 @Hanford, 200 @Nevada Test Site, 8 and 10.

This peculiar point in time is when the terminology regulatory capture (RC) took place. RC is when the oversight is conducted by the body with an interest in it's outcome. The CDPHE, DOE and EPA are governmental agencies with heavy influence, and although they may be without actual decision-making power they have captured the public in their scheme to represent local governments in appearance only and use this to 1) distract from the real health risks and 2) to silo a back-agenda. The general tone of the RFSC has been supportive of the cleanup as safe. Yet the cleanup budget was \$37B in 1995, and was supposed to take 70 yrs, and it came out at at \$7.3 B in 2006 11 yrs. later

What was withheld from the public was that in '95 DOE and Kaiser-Hill made a deal to terminate the cleanup in 2006 and with a fixed sum. Yet a group met for 3-4 hrs. twice a month for a year until DOE revealed that the cleanup was limited by fiscal restraints. They sacrificed subsurface soil remediation to different levels for different grades and indexed the exposure to that of a RF wildlife refuge worker to meet their revised budget. What's more, RF worker Jacques Brevet charges that the RF cleanup is based in part on falsified data that was discredited during the grand jury investigation but was provided to regulators as the basis for cleanup. Regulatory capture.

Saturday night at Kristen Iverson's 2nd book "Doom With a View" there was a panel. She said the public was not even informed of the 1957 fire until the 1969 one. The AEC (later the DOE) declared it the most expensive industrial fire in US history with 400 times that of background radiation. Unlike the current CO wildfire evacuations, there were no evacuations for the 1957 or 1969 fire. Nope, plutonium is the silent man-made fire. And with the deep & prolonged drought conditions causing these wildfires Colorado is experiencing, currently the two largest in CO history, what is the risk of wildfire redistributing RF radionuclides in 240 K years, the

half-life of plutonium?

What's more, Kaiser Hill, not RF, "cleaned up". They pocketed \$560 M for finishing early and under budget but none of the savings could be used to improve the clean-up. In 2004, Iggy Litaor from Tel-Hai Academic College, a soil scientist from Galilee, Israel said he studied the transport of radioactive actinides @ RF from '90-'95 and had his data withdrawn due to layoffs at Kaiser Hill. After the wet spring of '95, he claims the runoff caused at least 10 millicuries to travel 100 meters downslope and plutonium and americium were elevated in Woman Creek. This was long before the flood of 2013. The data capture in this 1995 rainfall event in and on the soil was his best research using an advanced monitoring system designed for such an event. This was done 25 year ago and now we have Michael Ketterer and the hot particle.

RF updates seldomly come up to the Boulder City Council or County Commissioners through Sam Weaver or Matt Jones who sit on the RFSC. The constituents in those bodies have no idea that today we have yet again an open position on the RFSC.

Sasha Stiles, a Family Practice physician with expertise in epidemiology was denied in 2018 against the same incumbent applicants that Randy Stafford is now up against. I enthusiastically recommend you support him for his outstanding command of the issues and history of the RF dilemma and as a representative of a more balanced RFSC.

Our team will be sending links to such informative documents as the Nuclear Guardianship booklet timeline and the "Bait and Switch" cleanup publication by LeRoy Moore from 2005.

Lynn