

Anonymized Name	Please share your feedback about the Rocky Mountain Greenway Project	Response to Comment
D.A.	I had the opportunity to ride this trail between Rocky Mountain Arsenal and Rocky Flats National Wildlife Refuges. This is the kind of outdoor amenity that brings visitors like me to Denver, again and again! Please keep it going!!	
T.W.	I'm so thankful to be able to access green space in Jefferson County. It is a primary reason I chose to live here instead of the urban center of Denver. Please continue the proud tradition of outdoor recreation in perpetuity in the Denver Metro Area.	
S.W.	I urge whoever came up with that "closure" in the NE corner of Rocky Flats to undo it, making it possible to form a complete loop trail around the perimeter of the property. Furthermore, there should be a form (and/or forum) to determine the best route for the RMG through Boulder County. The answer is NOT using the Boulder Feeder Canal, but instead utilizing in part the LOBO Trail from Boulder to Longmont, and then the St Vrain Greenway from Longmont to Lyons. It is possible and desirable to thread this RMG alignment through several high-quality areas for recreationists with minimal environmental impact. The trail should be designed for pedestrians, equestrians, and mountain bikers equally.	The restriction of public access in the northwest corner was at the request of the City and County of Broomfield. The Walnut Creek drainage basin is the non-potable water source for CCOB and there is extensive testing equipment in the creek. CCOB determined that in order to support the FLAP project, this access restriction would need to be met.
M.B.		
M.B.	Disappointed with the trails plan. 6-20 foot wide trail isn't what was discussed or asked for. This trail system will be popular with Strava users that will ride this trail system fast and hard. You have designed a user conflict problem.	While the Greenway is designed as a wide-tread trail, there are numerous other trail experience opportunities at the Refuge, which the Greenway will provide access to.
T.H.	I support the project. When I lived in Arvada I rode the improved parts around Standley Lake up to the current end point multiple times per week on my bike. Keep it coming North!	
B.E.	We NEED these open spaces and trails! Keep them a priority for our children!	
K.G.	I am thrilled that the Rocky Mountain Greenway project is becoming a reality. Opening the RFNWR to mountain biking, hiking and equestrian activities is turning a liability (former plutonium trigger plant) into a fabulous community asset that will quickly become a regional asset. I have studied the voluminous amount of data regarding the safety of the RFNWR and am more than convinced that the area is safe for unlimited use.	
J.V.	I'm glad this project is moving forward despite the concerns expressed by some about exposure to radioactive isotopes. I'm also glad that additional soil and air sampling are occurring to help build a better scientific foundation and hopefully public trust. I was hoping for more single track trails (2-3 feet wide) and multiple loops as opposed to the current plan which is largely focused on the Rocky Mountain Greenway (a single through path graded at 8-10 feet wide). To the extent that a more natural trail (2-3 feet wide) can be accommodated in addition to the Greenway, I think it will provide a better recreational experience that is high demand at least in conjunction with the south Boulder trail system.	While the Greenway is designed as a wide-tread trail, there are numerous other trail experience opportunities at the Refuge, which the Greenway will provide access to.
T.S.	WE absolutely need this and can't wait for it all to open.	
E.S.	I would love to see it open so we can all enjoy the beauty of this land. Mountain biking, running, hiking, and horse back riding.	
B.H.	This project is welcomed by the neighboring residents that I've talked to in the area that we live in (adjacent neighborhood to the refuge). We've all been looking forward to this initiative moving forward! It's frustrating to hear that activists are spreading misinformation that could disrupt this project.	
J.W.	I am a Candelas resident. I have also worked for more than 20 years in the industrial, hazardous and radioactive waste management industries. I have been perplexed and dismayed by the misinformation spread by a small group of activists concerning the status of Rocky Flats National Wildlife Refuge. (I am especially disgusted by the willingness of local school districts to act on this disinformation without critical examination.) It is my personal and professional opinion that public access to Rocky Flats is completely safe and will be a tremendous amenity for the local communities. I urge Jefferson County to support moving forward with this project expeditiously.	
J.A.	As a resident of the area, I would love to see additional trails available to the public. It is beautiful land that I feel is safe for whomever decides to visit the area and appreciate its beauty.	
J.W.	I'm looking forward to the opening for hiking & biking.	
A.K.	Please open as planned. The claim that local residents are opposed to the opening is false. I live a block from the south side of the refuge and am fully in favor of it opening. The people opposing the opening appear to be completely misinformed and do not understand how science and remediation works.	
R.K.	We back up directly to the Rocky Flats National Wildlife Refuge and fully support and welcome the opening of the land to public use. As a resident of Candelas we have no opposition to the plan and look forward to it's opening just like every other neighbor we have spoken to. Please don't allow outside parties to dictate how the residence of Candelas can use this open space resource.	
N.R.	Excited for this project to finally open and be available to the public!	
C.K.	Please open up Rocky Flats for recreational use.	
E.S.		
L.H.	This is a beautiful open space that animals have used as a sanctuary for many years. It was deemed safe to use, so please allow the public access to this space to enjoy the wonderful things it has to offer.	
R.M.	My family and I are in favor of the Rocky Mountain Greenway Project and of opening the Rocky Flats National Wildlife Refuge to the public. We live in Candelas and the proximity to the wildlife refuge was a significant driver for our decision to move there (I am aware of opposition to opening the refuge, but haven't been impressed by the logic that is being used by the opposition).	
A.B.		
J.F.		
S.U.	I am in agreement of having access to Rocky Flats National Wildlife Refuge. I feel it is important to the community and the well being of our neighborhood. I would like to have access to view the wildlife and for recreation.	
S.H.	We moved to Candelas and specifically bought a lot that backs up to the Rocky Flats Wildlife Refuge. We are in full support of the trails being opened and available for hiking, bicycling, and horseback riding. In addition we bought this home with full awareness that it was a former nuclear weapons plant. We have lived in the West Arvada area for 50 plus years and don't feel we are at any additional risks from this location.	
B.K.	We absolutely want this to happen.	
M.W.	I have lived near this area since 1978 and watched as the Rocky Flats produced triggers, to the clean up and now to the Candelas development where we moved after selling our horse property near Leyden. This area is clean and if it were not, we would not see eagles nesting successfully for 30+ years, herds of deer and elk, grasses, trees, birds, coyotes, snakes, prairie dogs, and everyone within about 3 -5 miles would be suffering multitudes of illnesses, mostly respiratory. I have asthma, and grasses do bother me, but that has nothing to do with incorrect and scary ideas that plutonium is floating around everywhere and sticks to your body, clothing, bike tires, etc and will kill you immediately or you will die a slow and terrible death. This trail is a wonderful addition to Jefferson County open space. If people are afraid and believe the rumors, they can choose not to ride or come here. It is unfair to the 2,000 + neighbors around here to be sabotaged by a handful of passionate but not truly factually informed non neighbors, which is what is really happening. We have a new K-8 Jeffco school, a new and lovely King Soopers, roads are being built and must continue to be built and widened in order to support the terrible traffic along 93 and Indiana. We fully support the trails projects, the Rocky Mountain Greenway, the Rocky Flats National Wildlife Refuge and the opportunities that it would bring to thousands of Colorado residents and visitors!!!	
S.M.		
J.S.	We are looking forward to the trails opening!	
F.V.	Looking forward to greenway	

F.J.	Please, Please, Please, move forward and open up the Rocky Mountain Greenway Project. I am a resident of Candelas!
S.H.	I am in favor of the Greenway project. I have lived in the area for approximately 35 years and am aware of the historical issues along with the remediation efforts. My professional background is in the Environmental field and would not have made the decision to buy a home, and move my family to the area without reviewing historical data to make an educated decision.
B.T.	Please open this project. We are all for it.
K.W.	We are homeowners within Candelas and adamantly support the opening of the Rocky Mountain Greenway Project.
F.W.	Regardless of what a handful of activists are trying to accomplish, the residents of Candelas are eager to see this project completed.
H.K.	My name is Bert Kingsbury. My family and I live in the Candelas neighborhood and our property backs to the Rocky Flats open space. My career was in industrial irradiation and radiation safety, working in the private sector. Prior to purchasing a house adjacent to Rocky Flats, I reviewed a significant amount of the public literature available on the reclamation process and data on the residual radiation remaining within Rocky Flats and the surrounding areas. Based on this review I have a very high level of confidence that it is not only safe for my family to live near Rocky Flats, but also to utilize the trails within the park. I look forward to the park opening and the completion of the Rocky Mountain Greenway.
D.A.	I live in Candelas and think that safeguards exceed what is required.
A.K.	I will welcome the opening of the park.
S.C.	Looking forward to having it open!
T.H.	I live in the Candelas, and I wanted to express my enthusiastic support of this project!
S.R.	As a Candelas resident who is located across from the Wildlife Refuge I am extremely excited about the Rocky Mountain Greenway Project and having access to hiking and biking trails!
S.S.	The Rocky Mountain Greenway Reserve is a promise to animals and people alike that this land will be a safe and peaceful place from here forward for all..
M.R.	Our family is excited to have such close access to the trails and diverse wildlife
D.S.	Looking forward to it and trust that those at CDPHE did their due diligence.
A.B.	Yes we would like it open.
N.W.	All for it... just do it right...
J.V.	This project needs to move forward. There is too much unsubstantiated feedback coming from activists. We in Candelas have done our research, we are tired of hearing how bad it is. It's been cleaned and verified, it's cleaner than most other places in the area because it's been done correctly. We're tired of people that don't live there making statements about how bad we have it, it's just not true. None of us would have moved there if that was true. This is an important project on valuable land. If they do to visit then keep them out, but let the rest of the people in the state enjoy this area. Send the crazy activists out to do the proper homework on the area, they have no idea what they are saying, they just want to stir the pot!
P.M.	I am writing in support of the Rocky Mountain Greenway project!
P.H.	I fully support the opening of trails in and around the Rocky Flats National Wildlife Refuge. My home sits 800' from the RFNWR and before moving here I did substantial research into the potential health impacts of the past operations at Rocky Flats. I am dismayed that a small group of activists are fighting what I see as a wonderful opportunity for recreation, exercise, and learning. Why should the opinions of a few prevent the opportunity to the many? My two young boys look upon the vast openness of the RFNWR with longing that one day they will be able to walk out their front door onto a path that takes them to see the elk, hear the birds, walk in the grass. Their lives are filled with looking, surrounded by screens, give them the opportunity to be in nature, not look upon it. Listen to the science, listen to the experts, listen to the neighbors. Build trails to the refuge.
C.R.	Thank you, Peter
C.M.	I am looking forward to seeing the Greenway being completed and plan on using it often.
J.P.	Hello. My name is Chris Riley. I recently purchased a home in Candelas. After many months of research I determined that the risks posed by the former rocky flats were too low for me not to enjoy all the other benefits the area had. And in fact one of those benefits is the refuge. If the refuge were not to open I would feel cheated in my investment in the community.
R.P.	It needs to open to relieve congestion on other area trail systems.
T.B.	I live in the neighborhood by rocky flats and support the greenway
C.L.	Looking forward to it opening
D.S.	Can't wait for it to open!
R.P.	Rocky Flats and the Rocky Mountain Greenway project are important assets to our community. Living near the refuge, we hope to enjoy the outdoor accessibility with our children as soon as possible!
B.B.	I am a supporter of this project. It will be an incredible addition and our community is very fortunate to be given the opportunity to have this type of project in our neighborhood. Our community and all folks from Colorado, and the surrounding states, will benefit from the Rocky Mountain Greenway for decades to come. Thank you for the chance to provide feedback on this project.
M.B.	Please, open it up! We look forward to living near a refuge with trails we can use& visit
J.T.	So very excited for this beautiful space!! As a neighbor I am very proud of the biodiversity and health of the property.
E.C.	I am visiting Denver this summer on vacation and look forward to seeing this project go forward I intend to ride whatever sections are open. Bike trails make my vacations more enjoyable as I visit new areas. I seek them out for vacations. I consider this support of sustainable recreation.
H.M.	As a resident of Candelas, I fully support the planned trail system thru the Rocky Flats wildlife preserve. One of the reasons I built a home in Candelas was to take advantage of the trail system.
A.B.	Please open the Rocky Flats National Refuge! Our family would love to hike and bike the Greenway!
I.H.	I'm excited about the opening of the Rocky Flats Open Space - huge boon for our community!
P.M.	As a resident of Candelas, let this message serve as my support of opening the Rocky Flats Wildlife refuge hiking and biking and general public use
B.S.	As a Candelas resident, I am eager for the Rocky Mountain Greenway project to proceed. We are excited about the hiking and biking opportunities so close to home.
A.M.	No concerns. Candelas resident looking forward to more biking trails.
J.N.	Hiking, biking and horse back riding will be a great use of the space.
J.W.	Please continue the project.
E.M.	My wife and I live in Candelas, and are looking forward to the recreational opportunities available to us in the Rocky Flats National Wildlife Refuge.
V.S.	I'd love to see this put into place. My family would use it all year round!
L.P.	C.S.
	I have been waiting for access to the preserve since I have moved here 3 years ago. I am totally satisfied to the safety of the preserve, since I have read the various environmental studies that have been published by official government agencies.
	Looking forward to using it
	We live in the Candelas community. We are looking forward to the Rocky Mountain Greenway Project to open this summer. We are not opposed to the opening.
	We in the Candelas community would love to see this project come to fruition. We have been eagerly anticipating the opening of the Rocky Flats Wildlife Refuge and look forward to hiking and biking in the open space there!
	E.M.
	We would love to have the Greenway open and can't wait to utilize the area.
	As a resident of the Candelas neighborhood, I'm hugely in favor of the greenway project and connecting it through Rocky Flats National Wildlife Refuge. I look forward to utilizing it with my family and am excited about the potential route all the way to Rocky Mountain National Park.

A.F.	I think that we should be able to utilize public lands for our use. We all own them and we should be able to enjoy what is in our local area.
L.H.	We are looking forward to the opening of the wildlife refuge and Rocky mountain greenway.
M.S.	
M.G.	I am for the Rocky Mountain Greenway Project
A.R.	I live in Candelas and my home immediately borders Rocky Flats. It has been a long time since science has determined this beautiful space to be safe. There is no reason that a small group of conspiracy theorists should stand in the way of this project. Their fear mongering is not based on science, but rather their own bias.
J.P.	As a resident of Candelas, this is an important addition to the neighborhood.
V.H.	So excited for it. Walk the outskirts daily.
J.M.	Important for both recreation and transportation options in the area
M.L.	I am excited for the Greenway Project to open. Please do so quickly. We moved our family to Colorado from Chicago. We love all of the outdoors access. We trust all of the study and remediation work that has taken place. Please open the greenway so that it can be enjoyed. Thank you!
Z.M.	
J.N.	We're excited to have the new open space. Anyone who doesn't want to use them can stay clear.
M.C.	As a resident of Candelas, my family and I can't wait for the Rocky Flats National Wildlife Refuge to open!
D.W.	I fully support this project and look forward to taking advantage to the trails with my family
T.J.	If anyone actually does some research on the area, they would learn the area is safe. I have lived in Rocky Flats my entire life 48 years. I feel more comfortable moving to the south of Rocky Flats right next door. I find it hard to believe for myself the family all the agencies involved would allow the land to be developed as populated if there were a problem. The protesters are exercising their right to voice their opinion; this doesn't mean the project should be stopped.
B.L.	We are excited for this to open and for our family to be able to enjoy this beautiful space.
C.H.	I back up to the Wild Life refuge and have been waiting for this system of trails to open. We are highly in favor of moving forward. We have lived here for 3 years. We have lived in Arvada CO for over 45 years and understand the history of this land and the current situation of the land. We are in favor of the trails opening.
R.K.	We want this land opened up as it is declared SAFE and is an awesome recreational opportunity. I also live in Candelas and not objecting to the opening.
K.K.	
S.M.	As a resident of Candelas Parkview, I cannot wait until we have access to the trail system at Rocky Flats. We are ready and 100% in support of the trail system
K.W.	Please allow the access to Rocky Mountain Greenway, we love to hike and bike and it is right next to our house.
F.L.	My husband and I have lived near Rocky Flats for over 40 years and most recently moved to the Candelas neighborhood. We feel the Wildlife Refuge should be open to hiking and visits to all those who wish to visit the area. If anyone feels that the area is not safe should read all of the documents pertaining to studies that have been done. It's a beautiful place to live and visit and should be open to everyone.
N.C.	This is an amazing idea! We live in Candelas and love the area!
D.M.	Please complete the project for the access of residents to the refuge
A.N.	
S.C.	Please do not delay this opening any further. Everyone who lives here is very excited for it. I'm tired of people who live nowhere near what they're protesting. You will be doing everyone a favor here in moving forward. Thank you!
J.B.	Let's get it open already! The vocal minority that doesn't even live in Candelas and other adjacent neighborhoods should not be allowed to dictate the future of the refuge. No one requires them to visit. Get this and the Northeast parkway completed!
S.H.	I want the wildlife refuge to open asap please.
D.B.	Make it happen! Can't wait to explore the reserve
P.E.	We need more safe pedestrian and bike passageways between north and south. Getting from Golden to Boulder is very dangerous and a trail system to do so is one small step in the right direction.
J.T.	I believe this is a wonderful project and will be enjoyed by nearby residents for many years to come.
P.J.	I am looking forward to seeing the RM Greenway and the trails through the Rocky Flats National Wildlife Refuge opened up.
L.T.	I am a Candelas resident and would like to see the Rocky Mountain Greenway open to the public as soon as possible. My dogs, husband and I plan on using those trails often once they are available.
B.B.	I live in Candelas and support opening the Rocky Mountain Greenway to trail development and public access!
A.B.	We are excited for the greenway to open! We cannot wait to use the space
L.J.	I think it is safe and smart for the community.
R.D.	I'm all for this project opening up and giving the local residents access to the beautiful open space our area has to offer. As to the claims that residents in the area are opposed: I was never asked, and am not opposed at all to this project.
A.P.	Resident of Candelas and I would love to have these trails open!
J.P.	
R.D.	I'm all for it
S.W.	The Rocky Mountain Greenway Project will be a great asset to Arvada and all of the northwest Denver Metro.
H.S.	I am super excited for the trails to open! We back to the flats and love the area!
K.J.	
A.S.	Please open soon!
J.H.	
V.P.	We live in Candelas and are looking forward to the opening in Rocky Flats
S.S.	I move to Candelas expecting to use this open space. My taxes are high so I expect good amenities!
H.W.	As a resident of Candelas, I strongly request moving forward with the project to open Rocky Flats to the public. My home backs up to the refuge, and knowing that the land will be cared for and enjoyed by everyone who visits is important to me as a homeowner. I am not at all worried about the supposed contamination as the soil has been tested and the contaminated layers have been removed. I view Rocky Flats as an asset to my community and to Arvada.
D.M.	
R.M.	
L.S.	I continue to find it disturbing that the very loud voices of a very small minority can not only spread lies to alarm the public about a threat that no longer exists and tarnish the reputation of a nearly 1000 household community, but also go so far as to nearly derail such a valuable community project at RFNWR! Many members of our community continue to speak up in favor of this project publicly but some additional education and support from all involved entities would go a long way and be greatly appreciated!
R.B.	We want it to go through! We're looking forward to it.
C.B.	Please open the Refuge soon.
C.D.	It is a huge addition to our community & it should be embraced! I am a native of this area, and have never, ever, had any issues with Rocky Flats. I would not have bought a house here had I not that it was safe for my family.
D.R.	Please open as much of Rocky Flats Wildlife Preserve as you can, as soon as you can
E.G.	I work for a weapons of mass destruction unit and we have tested the area for radiation and it is lower than what Radon emits. Very safe.
K.C.	We are so excited about the Rocky Mountain Greenway project. It looks like a great way to connect the trails.
T.C.	Fully support opening of Flats green space. Look forward to the opportunity hike and bike the refuge.

C.N.	I trust the evaluation conducted that the land is safe and having open space to preserve land and wildlife is important to us as a community.	
S.T.	This project will be an amazing asset to the community if designed and built with careful consideration of the environment, wildlife, and existing opportunities and constraints.	
A.O.	My husband and I support the efforts to complete the RMGP. Great way to keep urbanites and suburbanites connected with the outdoors in our gorgeous state. Please, consider also developing a strong outreach and education component for the RMGP for leaving no trace and trail ethics. Influx of people to Colorado and level of ignorance and recent alarming increase in (mostly unintentional) abuse of our open spaces is heartbreaking. Wouldn't want to see a great project like this ruined. Thanks for all you're doing!	
C.J.	Although slightly concerned about the condition of the former Rocky Flats grounds, I live in Candelas and want to see the community grow and expand.	
M.M.	Great plan - one of the reasons we chose this neighborhood	
M.B.	As a highly active family of three, with two dogs, in the Candelas neighborhood, we all enjoy hiking, biking (except for the dogs) and trail running. We are eagerly waiting for the opening of the Rocky Mountain Greenway and related open space recreational opportunities at Rocky Flats Wildlife Refuge. We rely on the scientific process and facts to support our conclusion that the area is safe. Warm Regards, Mark A. Bales, Ph.D., J.D. 9565 Poppy Way Arvada, CO 80007	
U.G.	As I'm a Candelas resident I'm looking forward to the opening! Have absolutely no concerns.	
D.D.		
R.L.	I'm very excited for this project to get underway.	
D.H.	I cannot support the Phase 3 portion of the Rocky to Rocky to Rocky Greenway Project. Too many Regional trails do not value the natural resources they destroy, disrupt, and disdain in the name of connected trails. The perception is that habitat fragmentation is a problem for someone else and that it isn't 'our trail' doing anything wrong. The trail will fit somewhere, even if the connection is fitting 17 round pegs in 13 square holes. We will make a hole. And that is exactly what happens: trails make a hole in habitat. Habitat that may have been great and is then changed to marginal. Or habitat that was so-so and changed to less so. Or habitat that was marginal (but still important, as perhaps the 'only game in town') and is changed to non-habitat. There are places that trails should not be. And there are connections that are too difficult to make - or their perceived benefits do not outweigh their impacts to the natural world. Few planners/people will accept roadside trails as the best connection, where experience ends up overvaluing the true goal of connectivity. But it is almost universal that adding to an existing disturbance will cause less environmental harm than a new trail through a lightly-to-unsued area. Boulder has 2 great examples of connector trails: the US36 connector from Boulder to Louisville that parallels the highway with minimal environmental impact that values and achieves its goal of connectivity; and the North TSA trail west of US36, north of Boulder that sacrificed many environmental values and impacts for the sake of a slightly better (someone's opinion) experience, when using much of an existing trail system would have achieved the same connectivity goals. Go ahead and build your front-country Phase 1 Trail, but strive for using existing trail sections for Phase 2. And give up on Phase 3 as infeasible, grandiose, expensive, unnecessary, and unabashedly impactful. Who benefits from this connection? Who would really use this? Who is physically able to use this or achieve that kind of ride, hike, run in a day?	Phase 3 of the RMG project is still in the conceptual stages and your remark is valid. As with phases 1 and 2 of the project, alignments along rights-of-way and existing trail infrastructure will always be the preferred alternative to disturbing native lands. While only a few trail users will likely complete the full route once it is finished, the purpose of the project is to provide as many Front Range residents as possible access to the open space and recreational opportunities at Rocky Mountain National Park, Rocky Mountain Arsenal National Wildlife Refuge and Rocky Flats National Wildlife Refuge. Boulder County has representation on the Rocky Mountain Greenway Steering Committee, I suggest you contact Boulder County Parks and Open Space to share your input regarding phase 3.
R.P.	Love the idea as long as it doesn't harm any animals homes. Maybe we can consider adding special bird boxes Ann's areas for the fowl and animals in the area.	Natural resource stewardship is central to the mission of the US Fish and Wildlife Service. All efforts will be made to minimize and/or mitigate any disturbance to the rich flora and fauna communities at Rocky Flats National Wildlife Refuge.
R.M.	I live in Candelas and one of the reasons I bought there was because of the planned opening of Rocky Flats National Wildlife refuge to the public. I like to hike, and ride horses. I'm a geologist, I know the area is safe, and I resent people, especially those who don't live in the area being obstructionist in terms of its opening. As a geologist I have a great love of nature and the outdoors and belong to a number of groups promoting protecting our environment. I also feel somewhat qualified to evaluate the clean up that has been done there. Please don't let people, many of whom may be driven by fear rather than by scientific fact, to keep Rocky Flats from being opened to the public.	
A.M.	Great idea	
K.F.	Please open the Rocky Mountain Greenway as soon as possible. I would love to have a trail that is close to home to ride my bike on.	
J.A.	One of the reasons my husband and I chose to move to Candelas is the nearby wildlife refuge and bike trails. We are hoping that the project is complete and open to the public soon!	
J.F.	I am eagerly awaiting more access to the national wildlife refuge.	
C.C.	I am looking forward to the opening.	
S.P.	There needs to be a non biased scientific study on the health effects of opening the Rocky Flats refuge to the public. Rocky Flats has a history of fraud and coverup of the safety of the plant when it was open. The chemicals and radioactivity are deadly and have potential long range negative health impacts. There are neighborhoods which were offered a settlement due to exposure to these dangers. I am concerned that possible digging, moving dirt and using the land will expose us to harmful chemicals and radioactivity in the air, landscape and water.	Numerous peer reviewed, longitudinal health studies have been conducted analyzing cancer and rare-cancer rates in communities 'downwind' from the site. Those studies show no increase in cancer rates for the study areas when compared to the rest of the Denver metro area. Those studies are available here: < https://www.colorado.gov/pacific/cdphe/cdphe-rocky-flats-cancer-study > Additionally, the City and County of Broomfield as well as the City of Westminster regularly collect water quality data from Walnut Creek, Mower Reservoir and Standley Lake. The results are made public and are available on the Rocky Flats Stewardship Council website here: < http://www.rockyflatssc.org/meeting_minutes.html >
K.G.		
J.R.		
H.B.		
S.S.	As a long time cyclist, a project such as the Rocky Mountain Greenway is a dream come true.	
J.S.	I am in favor of the Greenway Project.	
K.V.		
Y.B.		
A.B.	I think this project should proceed. Especially with the evidence gathered by unbiased sources.	
E.G.	Would be a great use of the reserve land, so people can appreciate their surroundings more.	
M.S.		
D.B.	We are more than ready for more trails etc. It would not be able to be opened if it were not safe!	
K.M.	We are anxiously waiting for the greenway to open on the Wildlife Refuge	
M.P.		
A.B.	Would love to see single track mountain biking trails!	
R.M.		
L.M.		
C.L.	I am very excited about the opening of trails	
K.A.		
R.J.	I like the Rocky Mountain Greenway Project and the idea of connecting the various cities.	
S.W.		
D.W.	Strongly endorse. Please act on the science, not the fear-mongering of addled activists or long-time conspiracy theories, behind the safety of the Rocky Flats National Wildlife Refuge.	

J.B.	100% in support.	
J.M.	Really excited for it!	
D.H.		
M.M.	I am all for opening this up, and very excited to have it available.	
L.R.	I look forward to using the park experience in the Rocky Flats National Wildlife Refuge. My home is right across the street from the southern border and I enjoy the beauty of its vastness.	
M.W.	Although I love the linked trail system and the RMGP I do not believe the trail should go through RFNWR as an unpaved or off-road trail. Either the path should skirt the boundary of RFNWR or be paved through that section so as not to continually disturb soil. A better solution may be to link a bike path along the Jefferson Parkway project and tie in north or south of RFNWR.	Conceptual plans for the Jefferson Parkway show a parallel 'bike path' along the roadway potentially offering an alternative RMG alignment down the road. The Parkway, however, is not yet a reality and the opportunity to leverage federal funds through the Federal Lands Access program is not guaranteed in the future.
L.W.	Based on the information I have to date, I am in favor of the project	
B.B.	I think it is a great project for our community! Fully support moving forward.	
C.A.	As a resident of Candelas one of the big draws in moving here was being so close to the refuge. I am fully aware of its former use but would like to see it opened to the public as open space. There are far more dangerous things floating in our air, water, and society as a whole than people would be exposed to in the refuge. Please do not let a small group of activists who do not even live near the refuge keep the rest of us from enjoying it. I support the opening of Rocky Flats Wildlife Refuge to the public!	
W.B.	Letâ€™s do it!	
T.G.	The Rocky Flats Refuge hasn't been proven to be safe for this use. More sampling is necessary. I've studied the various reports and the sampling in these areas was trivial. The ultimate crossings on Indiana and the proposed parkway go through areas of known contamination.	Areas in and around Rocky Flats have been extensively studied by numerous federal, state and private organizations. Millions of data points have been extracted from soil, air, sediment and water samples taken over the decades since the CERCLA cleanup. The FLAP partner group is committed to transparency and the protection of public health above all else. If the results of the Sampling and Analysis Plan reveal 'areas of known contamination', this will be widely publicized however none of the 1,352 surface soil samples taken in the windblown area exposure unit indicate point-source contamination.
C.R.	I believe opening the Rocky Mountain Greenway will serve the Candelas community well. I support opening the Rocky Flats National Wildlife Refuge to the public while still maintaining frequent and regular testing/monitoring of the water, air and soil in the area as well as the impact of people to the wildlife and land. From the on going research, testing and monitoring any future adjustments to the rules, regulations and policies can be made.	
M.K.	As a wildlife biologist and friend of the environment, I ask that you strongly consider the negative effects of building trail in the wrong places. Core habitat areas (center of wild lands which have no existing roads or trails) are essential to the survival of many species of animals, especially since most of our lands have been fragmented and forcing wildlife to take shelter in smaller areas or change their behavior to only come out at night. Please work with City and County biologists on planning these trails as we have a keen sense of where to align trails to avoid critical habitat areas. Consider too that trails are paths of invasive species introduction which compete or eliminate native species so again work closely with local biologists to plan these trails. We have the USFWS threatened Preble's Jumping Mouse along many riparian areas and even the smallest streams, especially Rocky Flats or the SE buffer Open Space areas, so please work to buffer your trails at least 250' away from any riparian drainage or else we will lose more of these threatened species and others that are not listed. We all love nature, but we can over-love it by wanting to "get in the middle of it". Please know that people must to give nature room, or nature will pack up and leave and that's not something any of us would like. Thank you for considering and I look forward to providing other feedback to this planning process for regional trails in Boulder County.	For the most part, the planned trails at RFNWR are on historic roads or other disturbed/impacted areas which will involve reclamation of significant areas for new habitat. New construction will be a last resort when no other alternatives are available. Natural resource stewardship is central to the mission of the US Fish and Wildlife Service. All efforts will be made to minimize and/or mitigate any disturbance to the rich flora and fauna communities at Rocky Flats National Wildlife Refuge.
L.L.	I fully support opening Rocky Flats Wildlife Refuge to hiking, biking and horseback riding. Wildlife and plants have been thriving since the clean up & I feel it's completely safe to open it up to the public. Please don't let the voices of people who are naive to believe our government is that corrupt that they would allow construction of home developments and the Open Space if it was unsafe.	
H.R.	Since my family and I moved to candelas five years ago, we were one of the first three families to have a house here, we have been awaiting the opening of the Rocky Mountain Greenway. To us this beautiful open space should be opened for trails and for people to enjoy.	
S.D.	Of course having more trails is a great idea but, PLEASE DO NOT have it cut across the highly contaminated land of Rocky Flats.	
M.S.		
J.W.	I'm all for it! Rocky Flats is probably one of the safest places in the area, years of extensive testing and close monitoring have turned up nothing. Lets get it done so we can enjoy this wonderful refuge!	
K.W.	I am looking forward to it.	
R.W.	Why would you ever risk digging in the ground that was known to be severely contaminated with very dangerous materials that can move around in the ground over time when there could be trails easily built around this area? Regardless of what the studies say, this area has a very dangerous past, leave that ground alone, please.	
C.P.	This is a wonderful project and I look forward to its fruition. Thank you for making it happen.	
R.C.	By pass Rocky Flats altogether. Make the trail go to the east and North of the site.	
M.M.	Disturbing the soil near the plutonium site is a terrible idea. The greenway should avoid the area altogether. It is an unnecessary risk to the public to have this trail enter into the geographic areas where plutonium contamination has been documented. The idea of a system of trails extending from DIA to Rocky Mountain National Park is a great idea. Having educational signs pointing out the history of the area (like Rocky Flats or the arsenal) are also great ideas. Bringing families anywhere near where there was contamination isnâ€™t smart and will cause many to ban the use of the trail. Please reconsider the trail routing.	
M.U.	PLEASE PROVIDE A TRAIL ON THE WEST SIDE OF INDIANA ST. TO ALLOW FOR USING THIS TRAIL FOR BICYCLE COMMUTING BETWEEN ARVADA AND 120TH. SURELY IT IS NOT TO MUCH TO ASK FOR A SMALL 2 WAY BIKE TRAIL THAT CUTS THROUGH THE AREA OF WALNUT CREEK THAT IS CURRENTLY SHOWING CLOSED ("LOCAL PARTNERS REQUEST USFWS PROHIBITS PUBLIC ACCESS IN THIS AREA) ON THE ROCKY MOUNTAIN GREENWAY MAP. IT COULDN'T BE TO MUCH TO ASK TO BE ABLE TO USE THIS ROUTE FOR BICYCLE COMMUTING. THIS WOULD GET MANY MORE OF US OUT OF OUR CARS AND ONTO BIKES ON A DAILY BASIS WHICH IS BENEFICIAL TO THE ENVIRONMENT AND ALL OF OUR OVERALL WELL BEING. THIS WOULD ALLOW US TO STOP FEELING LIKE WE WERE ENDANGERING OURSELVES AND THE FOLK IN THEIR CAR WHEN A BICYCLIST ATTEMPTS TO NAVIGATE FROM 86TH AVE TO 120TH ALONG INDIANA ST. PLEASE REDOUBLE YOUR EFFORTS TO HAVE A SMALL TRAIL PLACED IN THIS LOCATION. THANK YOU!	
C.R.	As long as the levels of plutonium or other isotopes are not in excessive levels in this area, I am all for it.	
D.R.	Open it	
J.L.	The RMG should go around Rocky Flats not through the Rocky Flats National Wildlife Refuge (RFNWR). The 1970 Atomic Energy Commission (AEC) weapons-grade plutonium-239 kriging map by AEC Physicists Krey and Hardy should guide you how far east! The RFNWR is not without weapons-grade plutonium-239 though CDPHE and USEPA have determined by subjective science (statistics) that the RFNWR is safe for all uses. The environmental samples at Rocky Flats prior to June 28, 1991 were not considered in the Comprehensive Risk Assessment and with a half-life of over 24,000 years Pu239 is as deadline pre-1991 as it is now.	True that the data in the CDPHE database starts in 1991. That said, the database contains 306 Pu-239/240 sample results for the wind blown EU and 50 such samples for the Rock Creek EU. It is also worth noting that Pu in the environment would no longer be considered weapons grade because it will have been oxidized after being exposed to the atmosphere.
R.S.	It is my opinion that it is dangerous to the health of both trail builders and trail users to route the trail though the "windblown area" east of the 903 pad, which was not remediated at all in the Rocky Flats "cleanup", and which is contaminated with plutonium to levels representing 1,024 times background radiation, according to CDPHE's own data. I have no problem with the concept of a Rocky Mountain Greenway Trail, I think it's a great idea for recreation, and I would use it. But I feel strongly that it should not be routed through unremediated land contaminated by a former nuclear weapons plant.	Surface soil sample results in the Refuge indicate that doses to members of the public would be less than 1 mrem/year. On average, Americans receive a radiation dose of about 0.62 rem (620 millirem) each year.

D.V.	Greenway Project does not need to go through the Rocky Flats Wildlife Refuge.	Proposed samples represent discrete samples from 0-2 inch depths. Sample locations will be randomly selected, not hot spots.
S.B.	As a resident of Arvada for over 50years, with family and friends who worked at The Flats from when It was built to being torn down (notice I didnâ€™t say cleaned up) I know only a complete fool would live in Candelas, visit the refuge, drive the beltway or believe that that land is clean and safe.	
B.G.	Why have the Rocky Flats Technical Group not been given a seat at the table as they were promised?	
B.F.	<p>I have major concerns regarding the opening what is now the Rocky Flats National Wildlife Refuge (formally the Rocky Flats Nuclear Weapons Place Buffer Zone) to the public. I have lived various locations, Golden and Boulder since 1990. There are many reasons to be concerned about public use of the buffer zone. The Rocky Flats fires from 1957 and 1969 released a great deal of radioactive contaminants into these areas adjacent to the plant. Clandestine dumping of radioactive and other toxic materials also took place. The buffer zone, where the proposed trails and public use are located, was never cleaned up or otherwise mitigated. As you probably know, plutonium can become easily airborne and even very minute quantities when inhaled, can produce cancer after a latency period which might last 10 to 20 years. Do we really want people out there recreating? Riding bikes and hiking out there on the windy, dusty Refuge will put unsuspecting people, most importantly, children, at risk. Simply the act of building trails out there creates potential health hazards for trail building workers too.</p> <p>On the topic of sampling, I suggest collecting and analyzing surficial samples which are not depth averaged nor averaged across broad areas. An attempt should be made to identify hot spots.</p> <p>In the end, I suggest that a preventative approach, which keeps people off the Refuge makes the most sense fro a public health perspective. The legacy of Rocky Flats is extremely toxic. The mismanagement of the facility has polluted surrounding lands in such a way that these health concerns will continue to exist for a long, long time.</p>	Proposed samples represent discrete samples from 0-2 inch depths. Sample locations will be randomly selected, not hot spots.
C.F.	As a 35.5 year employee at Rocky Flats nuclear weapon plant, 25 years in Bld 771, and 57 year home owner in Broomfield, I would like to use the area as a place close to home to hike and enjoy the unique grass land. I have not seen any verifiable report indicating Pu 239 above the world wide fall out from all the above ground weapons tests has ever been found. Every negative report I have read, is full of "probable", "likely", "it's been reported to", but no verified facts about plutonium contamination outside of the area inside the security fence. If there were a real problem, the new community immediately south of the plant would never have been allowed to be built.	
S.S.	After 2 years of thought there is no soil sampling plan. The Technical group has not been consulted as promised. There are studies ie the most recent in 2012 verifying serious contamination. Michael Ketterer plutonium soil expert retired from N ArizState testified Monday that the area was one of the worst contaminated in the USA and the are needs to be tested in multiple locations very frequently due to the changing wind soil water and seepage events from the superfund site. As an MD I am concerned with the high probability of new and long term effects from plutonium alpha radiation to open trails and the so called wildlife refuge. It is shameful and a disregard for our health to consider opening such locations probably forever and worse yet to open them with disregard of the concerns voiced by the private citizens and scientific community.	The draft soil sampling and analysis plan has been available on the project website since June of this year at: https://www.jeffco.us/DocumentCenter/View/13802 . Numerous members of the technical group have commented on the plan and the FLAP partner group is currently working with Dr Ketterer on a plan to share sample splits and data.
S.W.	I have been a non-motorized multi-use trail advocate in Boulder County for more than 40 years and am the current president of the Boulder Area Trails Coalition (BATCO). I urge you to connect the RMG through Boulder County on the EAST side of the Diagonal Highway (CO 119) on the LoBoTrail to Longmont, then north to the future St Vrain Greenway Trail west to Lyons. Please do NOT try to connect it through the nominally shortest route, either along Hwy 36 or the Boulder Feeder Canal. We have an excellent alignment worked out and would be happy to share it with whomever is going to be the point person or committee for the Boulder County segment of the RMG. Thanks.	
L.M.	The Rocky Mountain Greenway should bypass the Rocky Flats National Wildlife Refuge rather than enter and cross he Refuge, due to contamination with plutonium and other toxins at the Refuge and the DOE site the Refuge encircles.	
K.G.	Thank you for sharing the SAP and while I firmly believe in the validity of data and reporting from DOE and CDPHE, having an independent analysis and report to verify the safety or lack thereof will provide additional validation that the access points for the Greenway pose no threat to citizens who chose to use the trails.	
J.K.	I don not think the area is safe. There is wide spread contamination to the soil. Opening the area is much top dangerous to the population. There is always the possibility some of the containers are still there and it is common knowledge that some of the containers leaked. Contaminants leached into the ground are impossible to thoroughly clean.	The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.
J.S.	<p>Should the area be opened to the public I do not ever intend to go, nor encourage any of my family or friends to use the place. When the people living in homes across the street from there become ill perhaps individuals will take serious the gravity of living so close to Rock Flats.</p> <p>We had a friend that worked at the facility until he retired. Shortly after he became ill with cancer and died.</p> <p>This is a terrible idea. No soil on Rocky Flats should be disturbed. It may be fine for any county commissioners to decide this is a great idea but I am willing to bet they do not live close to the project and most likely will not choose to use it.</p>	

R.W.	<p>An actual list of ascertainable contaminants, in addition to plutonium, leaking from Rocky Flats Superfund is provided in the link below sourced from Cook v. Rockwell filings. The contaminants were found to migrate from the Superfund area.</p> <p>Any soil water AND AIR SAMPLING, as was promised by the jurisdictions involved & connected to the FLAP Grant in the public forums after public comment, must not only sample plutonium, but also ALL OTHER TOXIC, RADIOACTIVE & HAZARDOUS SUBSTANCES known, ascertainable, and/identified in public documents, classified documents, and/OR court filings related to the Rocky Flats Superfund Site, adjacent Refuge, and adjacent jurisdictional property whether ever sampled before for these contaminants.</p> <p>Any site sampled for one contaminant must be sampled for all ascertainable contaminants likely to be found there. Samples must not be manipulated to be found within acceptable ranges, for example diluting a sample, not taking enough of a sample, sampling in an area known to not be contaminated, averaging results of samples to lower the values within a range, or sampling in a way that will invite controversy.</p> <p>Controversy results in litigation.</p> <p>If you want to be free of controversy, allow your strictest & toughest critics to determine the methods, analysis, and acceptable ranges. If the area is as safe as the Department Of Energy, US Fish & Wildlife Services, & Colorado Department Of Public Health & Environment claim, then they should accept the challenge of allowing the critics choose the analysis, methodology, and acceptable ranges.</p> <p>Simply put, with all of the years of secrecy, this is the opportunity to gain the trust of the public. Otherwise, welcome to protracted litigation.</p> <p>Please see the list of ascertainable contaminants to be tested in the link provided.</p> <p>The Rocky Mountain Greenway is a neat idea, but any linkage on or near Rocky Flats is NOT a good idea, and sounds like an irresponsible idea drawn up by idiot politicians.</p> <p>America is made up of some of the greatest minds in the world. But, not allowing private citizens in to test, brainstorm, and solve nuclear issues, the biggest of which is what do we do with nuclear waste, is insane. More insane, is to declare a safe level to play with.</p> <p>Public comment is merely a procedural hurdle component of due process that is almost meaningless. Be the example. Allow your toughest critics to determine what is "safe."</p> <p>If a "safe" standard cannot be met, then drop the idea of including Rocky Flats and reroute the Greenway far away from it. It's that simple.</p>	<p>Soil samples will be discrete samples, not averages over broad areas. Samples will not be diluted. Samples will be analyzed for the most likely contaminants including Pu-239/240, Uranium and Am-241.</p>
R.K.	I'm very supportive of the Greenway Project!	
J.G.	Make it happen â€” open up this site to recreational users. People who are concerned can stay off the site, but let the rest of us use this area.	
M.E.	Nothing or no one should be allowed on this land. No houses should be any where near this land. Money talks and health is not an issue which it should be. The whole surrounding area is not safe. This land needs to be condemned for generations. Candelas should be closed down and demolished. Stanley lake should not be drinking water. Its not safe.	
E.L.	We all gathered with Allen Ginsburg to block rail shipments to Rocky Flats back in the "70's. He's sitting up there in heaven thinking : Huh, that really may of had an effect." Happy Summer. Tom Lefferts.	
C.S.	I am in favor of projects that connect people to open spaces throughout the Denver metro area. However, I am a little concerned about residual plutonium in the soil surrounding Rocky Flats, and the impact that disturbing that soil may have on the surrounding communities and the users of this greenway.	This is the purpose of the sampling - to collect data from the areas that will be disturbed by the construction activities.
R.B.	<p>Are you serious?</p> <p>Close the site down permanently.</p> <p>Forever.</p> <p>The risk is not worth the effort.</p> <p>Close it down.</p>	
T.G.	<p>The proposed Sampling and Analysis Plan at Rocky Flats is redundant and unnecessary. It duplicates previous studies to the detriment of outdoor recreation opportunities along the Front Range of Colorado.</p> <p>The Colorado Front Range Trail is envisioned as a Wyoming to New Mexico trail serving counties containing more than 80% of the state's population. It is substantially completed between the cities of Golden and Colorado Springs. The CFRT as planned will connect the outdoor recreation meccas of Boulder and Golden, with the Rocky Mountain Greenway and CFRT sharing common tread through Rocky Flats.</p> <p>Please complete the Sampling and Analysis Plan as expeditiously as possible so that Colorado residents and families can soon experience continuous recreational pathways between Boulder and Golden, and between Boulder and Colorado Springs.</p>	
C.L.	I lived east of Rocky Flats in the mid 70â€™s with my family. We have had scares with thyroid and testicular cancer along with rheumatoid arthritis and CLL. PLEASE do not open up the grounds around Rocky Flats to cyclists and hikers. PLEASE! The government hid the facts about Rocky Flats dangers before and I do not trust that a few random tests going in heâ€™s into the ground is going to prove anything. Go 6 feet deep and see what you find. Test the water too. Plutoniumâ€™s half life is 24,000 years!!!! Just you wait...20 years from now the amount of cancers in the new neighborhoods built on those lands and the folks that recreate on those paths will skyrocket. And then what? Will you claim innocence then? I am a hiker, a cyclist, an outdoorsman but still I would NEVER think of stepping foot on those grounds. Show some courage, some common sense. The government ruined that land with their poor judgement in building a nuclear plant west of Denver with the prevailing winds from the west. Donâ€™t turn your back on the facts, real facts that this is a very poor decision. This is not a wildlife refuge that is safe for animals or people. Use logic... keep it closed!!!!	<p>Numerous peer reviewed, longitudinal health studies have been conducted analyzing cancer and rare-cancer rates in communities 'downwind' from the site. Those studies show no increase in cancer rates for the study areas when compared to the rest of the Denver metro area. Those studies are available here: <https://www.colorado.gov/pacific/cdphe/cdphe-rocky-flats-cancer-study> Additionally, the City and County of Broomfield as well as the City of Westminster regularly collect water quality data from Walnut Creek, Mower Reservoir and Standley Lake. The results are made public and are available on the Rocky Flats Stewardship Council website here: <http://www.rockyflatssc.org/meeting_minutes.html></p>
K.M.	<p>I would love to see a muti-use trail that spans so many miles and different terrains.</p> <p>Please make sure exposure standards reflect the science of 2018 and not 1996 or 2005. Much has changed in the past 10 to 20 years as to what is considered safe.</p>	
S.P.	<p>This "public engagement" was anything but. There were many unnecessary obstacles to making a comment. The ones I personally suffered were having to use a computer at a table with no chair (I had to kneel on the floor to type), the unnecessarr requirement on the computer to fill in identifying info, and no nearby help to make the computer work.</p> <p>The people manning the exhibits could not answer basic questions about the exhibits. I received two "I don't knows" to my first two questions.</p> <p>More after I make my way through.</p>	<p>Table 8-1 of the SAP contains Preliminary Remediation Guidelines (PRGs) updated in 2017 to reflect current toxicological information on Pu, U and Am.</p>

K.M.	I would love to see a multi-use trail that spans so many miles and different terrains.	Response to comments: 1) A Health and Safety Plan will be developed for field sampling personnel. 2) It is highly unlikely that significant amounts of dust will be attached to workers clothing from a short sampling event. 3) The crossings are located in areas where wind transport present the only reasonable transport pathway. Consequently, contamination should be located on the near surface soils, having been deposited there by wind transport. Studies of soils near the 903 Pad at RF documented that the vast majority of the Pu in the soils (65%) resides in the top 3 cm of soil, with the remaining 35% in lower depths. At the time of construction the selected contractor will develop a health and safety plan to address potential concerns for their workers. 4) The bridge over Indiana Ave and the tunnel under Hwy 128 may decrease the potential for animal/auto interactions. 5) Noted. The purpose of this sampling project is very narrow and restricted to sampling of the two crossing locations, not to evaluate previous risk or sampling studies.
R.P.	I'm very much looking forward to the opening of this beautiful area	

Thank you for the opportunity to comment on the SAP for the Rocky Mountain Greenway Trail Crossing. As with all projects the entire project must be considered for compliance and environmental concerns. The Geomorphic region labeled Wind Blow Area appears to in area with nearly the highest range of Americium-241 and Plutonium 239/240. The crossing proposed for Indiana Ave is located in this area. This would expose workers and samplers to possible high levels of these extremely dangerous and toxic elements. If the Project is complete and the public is allowed into this area the public would then be exposed to these extremely dangerous elements. As a member of the public I therefore have great concerns regarding this project and they include but are not limited to the following:

- During sampling a Health and Safety plan must be developed. If it has been developed it should have been presented with the SAP. The SAP indicates that the only waste being generated during sampling are 1) Rinse Water, 2) Excess Soil, and 3) Vinyl Gloves. This indicates that no booties, Tyvek suits, nor respirators will be used. Samplers may be exposed to Americium-241 and Plutonium 239/240. Dust could attach to shoes and other clothing. Dust could be inhaled. Epidemiologic studies for Plutonium workers at Rocky Flats indicate deaths reported for benign and unspecified neoplasms numbered eight versus an expected two, a significant elevation. These tumors, all intracranial, are the subject of a case-control study to be reported later. The most conservative approach should be taken, which would be to protect workers and the public from any exposure to Americium-241 and Plutonium 239/240. It is also noted that no QAPP was presented for comment.
- If dust is attached to workers clothing these particles could adversely affect members of the public, including but not limited to their families.
- The samples are shallow 0-2 inches. The structure will require foundational excavations that are deeper than 2 inches. The SAP does not determine the Americium-241 and Plutonium 239/240 to the depth that the foundation excavations will be dug. Without knowing the Americium-241 and Plutonium 239/240 concentrations at depth how can worker safety be protected? In fact the hazards to workers cannot be evaluated without data.
- Animals including Elk, Deer, Antelope, Coyote exists on the Rocky Flats Greenway. These animals cross Indiana Ave and are struck by cars. This endangers their lives but also is a human safety risk. Now is the perfect opportunity to reduce the human health risk of animals being struck by cars and having these crossings as an Animal crossings, this would not increase the spread of the Americium-241 and Plutonium 239/240 more than currently is occurring, because these animals already exists and spread the Americium-241 and Plutonium 239/240. This comment does not mean I believe people should be exposed to Americium-241 and Plutonium 239/240!
- Page 8 Table 2-3 states that the Minimum Value (pCi/g) for AM-241 is 0. This should be changed to ND or below the detection limit of the analyses performed. Even if it is a Table extracted from the Kaiser-Hill 2006 report mistakes should not be promulgated.

These five concerns by no means are all of my concerns. Comment five indicates that all previous work should be examined with a fresh look to determine if the available data has been evaluated properly. Thank-you for the opportunity to comment on this project and I look forward to your responses. Please do not just note the comment, in this extremely important project. All comments must be taken seriously.

E.E.	The analytical method proposed, ASTM Method D3972, is not appropriate. It is a method for isotopic analysis of uranium in water. It is not appropriate for plutonium is a soil matrix. An appropriate analytical method for uranium and plutonium is soil is EPA Method EMSL-33.	The SAP will be amended to expand the discussion of analytical methods. The SAP will also discuss ALS qualifications.
J.P.	It is very tough to get good plutonium recovery from soil and takes good laboratory technique and practice. Does ALS Global Laboratory have this expertise? (24,000 yr. 1/2 life) 2 yr. Grand Jury report which states that "multiple paperwork lies and infractions, many illegal activities which put workers and public at risk." Devaluation of property is not as important as lives are - Go around RFP! [presumed to mean Rocky Flats Plant] Not worth the risk, however small. The perimeter is not a gateway.	
R.B.	Please consider stirring up the soil in the fashion it would be done for construction if initial findings of uranium/products is 'acceptable'. Keep in mind the building of the houses at the I-70/Hwy 6 eastbound area 20 years ago as well as the construction of the Flatirons Crossing. Soil Shifted. Safety is my long term goal for the community. Leave this land area alone, stop disturbing the soil please. I strongly support the Project. Science is very clear that exercising in nature is the single best thing any one can do for their physical, mental, and emotional health. We need more opportunities.	
B.B.	Some people are concerned about the past activities of the location. That's fine. If they don't think the site is safe, they shouldn't go. They should not be allowed to mandate their personal choice on to me or the rest of the public.	
M.L.	Explain the year of the science that justifies the benchmark figures on board two. Science can define from a dog's feces the exact animal. How about prairie dog, rabbit, elk, etc feces (and the carcasses of dead 'resident' animals) evaluation for radiation.	Table 8-1 of the SAP contains Preliminary Remediation Guidelines (PRGs) updated in 2017 to reflect current toxicological information on Pu, U and Am. Board two was not used in the development of the SAP.
B.S.	I am looking forward to the new use of this site with a troubles past. We cannot 'fix' these sites but can learn to live with them. I am satisfied that sufficient information has been compiled and enough people have considered its re-use to make it a safe approach for re-use.	
D.B.		
K.M.	I would like to see accuracy and consistency in the sampling locations. They are interchanged within the document and they are labeled incorrectly on the Conceptual Project Map. This could call into question the validity of sample results. Perhaps rename them "bridge" and "tunnel" if "D" and "E" are too easy to mix up. It also seems as though a better path design could be created that skirts the Wind Blown Area where there have been historically higher levels of all COCs. I'm also interested to know how deep will the contractors dig down to lay the path material? 6 inches? Perhaps sampling depth should coincide with disturbance depth.	The labeling of the locations will be updated in the SAP to be consistent. The crossings are located in areas where wind transport present the only reasonable transport pathway. Consequently, contamination should be located on the near surface soils, having been deposited there by wind transport. Studies of soils near the 903 Pad at RF documented that the vast majority of the Pu in the soils (65%) resides in the top 3 cm of soil, with the remaining 35% in lower depths. At the time of construction the selected contractor will need to develop a health and safety plan to address potential concerns for their workers.

Thank you for the opportunity to comment on the SAP for the Rocky Mountain Greenway Trail Crossing. This will be my second set of comments on this project. To understand my concerns the pathways of exposure must be stated. When dust that has particulates of Americium-241 and Plutonium 239/240 is encountered the dust could be inhaled or ingested. The Americium-241 and Plutonium 239/240 particle could become stuck in the mucus membrane. The membrane would be burnt by the radioactive decaying particle. Epidemiological studies for this type of injury indicate high rates of cancer. Workers and the public should be protected from these injuries during sampling, building, walking and recreating. Engineering controls have not been used to prevent injury to the public.

The "Supporting a Conservative, Approach to Cleanup at Rocky Flats. FINAL REPORT December 2003" states in clear terms that the cleanup goal should be 2.5 picocuries per gram. While worst case scenario indicates a protective level of 1 picocuries per gram is appropriate (see paragraph 4 of this comment). Sample analyses from the area that the project is to be completed in have reported 49 picocuries per gram. Engineering controls to diminish the risk to workers and the public should be implemented prior to project commencement.

The "Supporting a Conservative, Approach to Cleanup at Rocky Flats. FINAL REPORT December 2003" also stated that the "The wildlife refuge scenario does not provide an adequate basis for long-term public health protection."

R.A. In the Press Release for "Setting Cleanup Standards to Protect Future Generations: The Scientific Basis of the Subsistence Farmer Scenario and Its Application to the Estimation of Radionuclide Soil Action Levels (RSALs) for Rocky Flats. December 2001" it is stated that no concrete clean up standard is set or defended.

In the "Final Report Task 6: Sampling Protocols Radionuclide Soil Action Level Oversight Panel December 1999" page 23 it is stated that Soil action levels for 239Pu were from 80 to 110 pCi/g for these scenarios assuming a 15 mrem dose limit and when the current vegetation was present. Under a special case where a fire removes most of the vegetative cover, soil action levels for 239Pu dropped to between 10 to 25 pCi/g mainly because resuspension was substantially higher for bare soil compared to vegetated soil. Consequently, inhalation was the dominant pathway for the fire case, while the soil ingestion was the dominant pathway for the no-fire case. This indicates that the appropriate long term protective concentration of Americium-241 and Plutonium 239/240 concentration in soil should be 1.0 pCi/g.

Table 2-3 of the SAP indicates that the concentration in the wind blown area is 0.002 to 49 pCi/g with a mean of 9.44 pCi/g. There is an excellent argument to be made for a 0.1 pCi/g or ND is the proper risk based exposure level for Americium-241 and Plutonium 239/240. The cost of implementing engineering measures that would achieve this standard is economically feasible. The current project exceeds the risk based clean up level for the area, and allowing people to walk around in this area is irresponsible.

Comment noted. It is beyond the scope of this sampling study to revisit previous risk assessments. The scope of this SAP is to collect additional soil samples and analyze them. The wildlife refuge worker (WRW) and wildlife refuge visitor (WRV) models developed during the CERCLA cleanup remain the most extreme exposure scenarios assuming a lifetime career refuge worker with 50% field work (in the case of WRW) and assuming, among other complete pathways, oral ingestion of surface soils and sediments by a child (in the case of WRV). This has been and remains a very conservative bar to clear.

E.R. 2 inches is nowhere near deep enough for meaningful sampling. One little dust devil can blow away 2 inches of soil in a second, and Rocky Flats gets tornadoes! There are many kinds of burrowing animals in Rocky Flats that go down meters, not inches. Longtime Rocky Flats worker Joe Barton testified in court last Tuesday that hundreds of kilograms of plutonium were buried and remain at Rocky Flats in just the sub-basement of one building. By

in response to the request for public comment regarding the Sampling and Analysis Plan (SAP) for the Rocky Mountain Greenway Trail Crossings prepared June, 2018 by Engineering Analytics Inc, it is hoped that the following recommendations will be received as constructive criticism. The Design Quality Objectives (DQO) process is meant to be an iterative procedure, and the public comments should provide an opportunity to revise the experimental design and analytical methodology, to better accomplish the stated goals of this project. Those goals include: the collection of soil samples, radiochemical measurement and data analysis in comparison to previous studies, all in order to establish the potential health risks to visitors and refuge workers at the two proposed crossings. Ostensibly, these findings will be used to make a determination about opening the refuge for recreational use, as well as to avoid public controversy if the refuge is indeed opened.

N.P. HYPOTHESIS

To that end, soil samples from the two crossing locations indicated in the SAP will be analyzed for radioactivity related to three contaminants of concern (Americium, Plutonium and Uranium) to test a null hypothesis: "that the average radionuclide activity at a crossing exceeds the average in its associated EU." where the EU (exposure unit) consists of a defined area within the refuge (in this case, the Wind Blown Area and the Rock Creek Drainage, described in the 2006 RI/FS). However, the formulation of this null hypothesis is not suited to the goals of the SAP.

First, the heterogeneity of the distribution of radionuclides within the two EUs has been well documented [1][2][3][4], indicating that the average (mean) amount of radionuclides in soil varies widely across the EUs, with decreasing concentrations in proportion to the distance from the central operating unit. In other words, this null hypothesis is not a useful or conclusive way to establish potential health risks at the crossing sites, nor for comparison with previous data from within the EUs. As the Risk Assessment Corporation (RAC) report points out, "The use of the mean as a descriptive measure for comparison to the soil action levels cannot be justified because it is not possible from any site investigation to know the true mean, which is the appropriate parameter." The Science Advisory Board suggests that the Sign test used in NRC (1997) be replaced by using a "resampling" or "bootstrap" estimator for the distribution of the arithmetic mean. That is to say, simply comparing soil averages from samples at the crossings to the overall average of the EUs in a greater-than, less-than approach, as proposed, is not statistically defensible due to the spacial variability in the distribution of the contaminants.

Resuming defensible methods of statistical inference are employed, the null hypothesis may still inspire skepticism in relation to the goal of establishing health risks at the two crossings. In comparing the activity of soil samples to historical data levels, the idea would be to demonstrate that the current levels do not exceed a previous threshold value used as a Soil Action Level for determining the necessity of remediation measures at the site. However, several considerations were used to set those levels, not all of which are related to health risks, including economic factors, time constraints and expected limitations of on-site activities, which have changed. The health risk assessments are also based on exposure pathways for humans only, and do not reflect dangers to other animals, for example: a dog sniffing along the trail, or a horse eating grass contaminated by root uptake. These models also may not account for other methods of soil redistribution and risk to surrounding communities not previously considered, such as transport on bicycle tires from refuge to residential areas. For the purpose of satisfying the goals of the SAP, more dosimetric risk assessment models should be examined, as a lower acceptable threshold may be deemed appropriate.

It is therefore strongly recommended that the statistical test be reevaluated and the null hypothesis reformulated prior to the finalization of the DQO. It is further suggested that an environmental statistician be added to the study, echoing the words of the RAC report, "RAC recommends that the DQO planning team include a statistician familiar with the RFETS site and environmental statistical designs."

A.F. The sampling taken at Rocky Flats has only been taken at specific areas and does not take into consideration the hot spots and highly contaminated areas the former nuclear weapons plant has left. Sample results have been averaged making the data seem less harmful to human health than if the results were analyzed in relation to their sampling site. The statement made by the contractor, Engineering Analytics will be taking multiple samples but testing only one sample, this does not allow for human error and does not practice standard scientific protocol, eliminating the opportunity for proper data analysis. Proposed samples represent discrete samples from 0-2 cm depths, not hot spots.

R.Y.	<p>The scope of work for the Sampling and Analysis plan is insufficient and deeply flawed looking only at samples in disturbed areas of the embankment on CO 128 for the culvert underpass and in disturbed areas mostly east of the proposed bridge location east of Indiana Avenue. The sampling protocol relies mostly on recent studies of a DOE contractor, Kaiser - Hill and consultants for the Candelas development along CO 72, CTL Thompson and HydrosConsulting. These studies and the SAP rely on previous samples taken in the most impacted area, the 'Windblown Area' directly east of the greatest source of contaminants in the soils of this area, the 903 Pad where more than 1000 leaking barrels of contaminated machine oil and other waste were stored and which is directly east and downwind of the proposed Indiana bridge crossing site. The sample sites referenced in the SAP, in the area of most soil contamination potential outside the DOE 'Legacy' Site in the 'Windblown Area' are mapped at from 1/8th to 1/4 mile apart in separation, providing very little in the way of true risk assessment. SAP conveniently and negligently cherry picks references for the sampling protocol which ignore the major body of work done in the soils of the Rocky Flats area from the 1970's until 2000. Particularly Stone, et. al. Soil Sampling Site Characterization Near the Rocky Flats Plant, Colorado State University,1994. This study includes two pages of other sources references related to soil sampling protocols for radionuclides but all of which are ignored by the SAP. Stone, et. al. in 80 pages, show that :</p> <ol style="list-style-type: none"> 1. Most soil contamination is in the top 1 - 3 cm of soils and is derived from the 903 Pad at the east boundary of the 'Legacy' plant site. 2. This soil contamination is concentrated in a wind vector from 90 degrees to 115 degrees east . <p>This vector leads directly to the proposed site of the Indiana bridge crossing and is then directly in the path of the most contaminated soils which the SAP prefers to reference only widely spaced and thus potentially inaccurate measurements. This is confirmed in the SAP's own figure 3 16 from the "facility RCRA investigation." The SAP flaw is relying only on a few more recent studies and willfully ignoring the extensive previous literature on the subjects going back 4 decades, in conducting only two samples on the west side of the bridge, and not recommending the obvious: that the bridge, or any crossing of Indiana should be moved south of the Lower Woman and WindBlown areas. The SAP site is perhaps the worst site you could pick. Why take needless risk when the bridge crossing could be re-located for connection to the existing Westminster trail and avoid both trail construction disruption of a contaminated soils vector downwind of the 903 pad and avoid ongoing and needless exposure from horseback riding and MTB's, etc? (See also work showing this vector from the 903 pad by Krey and Hardy, for the AEC and also by Stone, Webb and Whicker, also CSU, and others in the reference earlier.</p> <p>The Indiana bridge will connect to a trail system inside Rocky Flats. It needs to be sited in the area of the least, not the most potential contamination. We know that the 1/2 life of the acknowledged plutonium from the 903 pad in the soil is 24,000 years. Why place more than 1000 future generations at risk. As Carl Spreng from CDPHE stated at the Arvada 'sharing session', " the risk per year may be as low as only two additional cancers/year/million residents from additional exposure to particulate Alpha radiation. For more than 24,000 years, that is a lot of additional cancer to contemplate</p>	<p>The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. The location of the crossings was determined prior to hiring EA to perform the sampling, however the Denver, Northwestern & Pacific Railway Hill Route (through Rocky Flats and upon which the trail crossing Indiana trail crossing is located) was constructed in the 1920s, far predating the nuclear facility. The purpose of the SAP is to discuss how the samples will be taken. The samples are intended to assess the potential for members of the public to be impacted, and as such, are limited to surface soils, not soils at depth. The wildlife refuge worker (WRW) and wildlife refuge visitor (WRV) models developed during the CERCLA cleanup remain the most extreme exposure scenarios assuming a lifetime career refuge worker with 50% field work (in the case of WRW) and assuming, among other complete pathways, oral ingestion of surface soils and sediments by a child (in the case of WRV). This has been and remains a very conservative bar to clear even in the windblown area exposure unit.</p>
S.S.	<p>Your published plan did not include the Technical Group as promised. I support the critiques of Nathan Pearce and Michael Ketterer. As an MD I am extremely concerned about ongoing medical disability from weapons-grade plutonium from Rocky Flats. To increase the risk by spreading possible "hot spots" of weapons-grade plutonium would further damage our current population and cause irreparable harm to our genome as well. Please keep us safe. Plutonium 239 is never safe. Do not spread it ever, in any way. Do not report testing as means. Do not compromise the Front Range any more than it already is.</p>	<p>It is worth noting that Pu in the environment would no longer be considered weapons grade because it will have been oxidized after being exposed to the atmosphere.</p>
S.S.	<p>Sampling plan is adequate as proposed.</p>	
D.G.	<p>Very skeptical of decades of corporate/government mismanagement at Flats, known illegal/criminal activity. Be suspicious/cautious about underpass areas. Use best practices for soil sampling, perhaps raise the bar. Engineering consultant team political conflicts of interest/agenda? I support Greenway, I oppose refuge trails. Doubtful I would ride the refuge, I hate riding on busy/noisy streets like 128/Indiana, would prefer offsite trails - other side of Flats proper, west of Indiana or maybe perimeter.</p>	<p>The wildlife refuge worker (WRW) and wildlife refuge visitor (WRV) models developed during the CERCLA cleanup remain the most extreme exposure scenarios assuming a lifetime career refuge worker with 50% field work (in the case of WRW) and assuming, among other complete pathways, oral ingestion of surface soils and sediments by a child (in the case of WRV). This has been and remains a very conservative bar to clear.</p>
J.D.	<p>Sampling at statistically unsound numbers locations sorely inadequate to ensure public health and safety. It's contaminated by radioactive waste. It's Death Valley.</p>	<p>EA used Visual Sample Plan (VSP), developed by Pacific Northwest National Laboratory (PNNL), to develop the sampling design. VSP is a software tool that supports the development of a defensible sampling plan based on statistical sampling theory and the statistical analysis of sample results to support confident decision making. VSP incorporates a variety of sampling designs, including those described in MARSSIM, in its programming. Based on the projectspecific sampling goals, VSP calculates the number of samples to be collected and identifies random locations for the samples to be collected. Information on the VSP software is available at https://vsp.pnnl.gov/. As indicated on the PNNL website, VSP's development was supported by a variety of federal departments, agencies and commissions, including the DOE and the EPA.</p>
J.M.	<p>Although I think the Rocky Flats area should stay closed, please sample the water as well as the soil. Animals and small children are drawn to water, and this, along with the soil should be tested.</p>	
R.D.	<p>I can't believe I have to even write this. How is this a good idea? Even after visiting the open house and speaking to the officials, it is clear to me that common sense says, we should NOT be exposing people, especially children, to this area. Please do not allow for people to recreate in this area. It is an irresponsible choice.</p>	
N.M.	<p>Nuclear waste sites should not be recreation areas. This is a terrible idea</p>	
K.G.	<p>As a physician and scientist I adamantly oppose the opening of Rocky Flats area to the public. The radioactive contamination isn't gone, and won't be gone for millions of years. It is a public health issue- people's health will be endangered by visiting the area. This might be an important greenway but it shouldn't be open to the public ever.</p>	
A.C.	<p>Please, PLEASE do not open rocky flats to people. It is not safe and we have plenty of other trails. What concerns me most is the churning of souls during construction. I don't believe for one second those soils were fully cleaned up. One need only to look at history surrounding the complex to see the lies and secrecy involved from inception to closure.</p>	<p>The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.</p>
J.S.	<p>A method to remediate nuclear waste has yet to be discovered. Currently, that land is unsafe for a minimum of 250,000 years. During that time, it will continue to harm the water and wildlife. It is unacceptable to encourage its use.</p>	<p>The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.</p>
E.C.	<p>KEEP ROCKY FLATS CLOSED FOR ALL OF OUR SAFETY. THIS IS A NUCLEAR DUMPSITE, NOT A PLACE FOR HUMANS OR ANIMALS TO BE RECREATING. IT IS DANGEROUS. KEEP ROCKY FLATS CLOSED!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!</p>	<p>The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.</p>

I have identified the following issues in regards to the proposed Sampling Analysis Plan proposed by Engineering Analytics.

- if Sampling of only the trail crossings at Indiana Street and Highway 128 to corroborate state and federal findings from earlier sampling is inadequate to assure public health safety.
- o Samples should be analyzed according to methodology that will actually identify if PU 239 is present, and how much.
- o Sample results should be compared to other expert sampling results, such as Harvey Nichols, etc.
- o Previous sampling methods took discrete soil samples and composited them before analyzing radionuclide levels. This methodology prevented identification of areas that had high levels of Americium, Plutonium, or Uranium that are inconsistent with public health standards.
- o The contractor, Engineering Analytics (EA), does not explicitly describe how the samples will be handled for analysis. It is crucial that each sample be analyzed individually and not composited. The methodology should be explicit in the work plan.
- o EA states that duplicate samples will be taken, but only one sample from each site will be analyzed. More than one sample from each sampling site should be analyzed.
- o Independent sampling and analysis should also be allowed.
- o Samples should be analyzed at more than one laboratory, including one that is not an EPA lab.
- o Sample results should be evaluated by an expert who is not a DOE former employee and who is not on a CDPHE advisory board.

There are a great many comments here that are not germane to the SAP. We have addressed those comments that are germane to the SAP:
The location of the crossings was determined prior to hiring EA to perform the sampling.
The purpose of the SAP is to discuss how the samples will be taken. Soil samples will be discrete samples, not averages over broad areas.
Duplicates will be taken at a rate of 1 per 20 samples and duplicates will be analyzed.
The analytical laboratory is certified by the National Voluntary Laboratory Accreditation Program (NVLAP) operated by the National Institute of Standards and Technology (NIST).
The contractors, EA and their subcontractors and employees, have no stake in the outcome of the study and are only tasked with taking samples and reporting the results.

B.L.

if Why is Superior not part of the Partners requesting this study?

- if The contractor, Engineering Analytics (EA) is to perform the requested diligence including public engagement and outreach. Problems:
 - o There is no language in the EA proposal that explains how public comment will be used to guide soil sampling and analysis.
 - o Public comment is not included in the EA Project Schedule.
 - o There is no guarantee that public comment will be incorporated into the soil sampling and analysis.
- i, \$ How will comments be recorded from the two Open Houses and electronically?
- i, \$ How will content analysis of the comments be conducted?
- i, \$ What is the expertise of those doing the content analysis – none of the principals in the EA team show qualitative data analysis experience.
- i, \$ How will the comments analysis be shared with the public? What safeguards are being put into place to guarantee transparency in this process?
- o Bring in an independent expert to oversee the qualitative data analysis of public comments. It is inappropriate for the public comments regarding a contractor proposal to be solely analyzed by the contractor. Transparency is crucial in this process.
- o How will the findings from the analysis be shared with the public?
- o What actions are possible from the findings of excessive exposures to the radionuclides?

R.H.

I.R.

K.C.

B.L.

M.F.

J.M.

T.B.

D.V.

C.G.

M.N.

P.D.

R.L.

D.K.

L.V.

C.A.

R.S.

	<p>Null Hypothesis -----</p> <p>Section 3.2 defines the null hypothesis as, "the average radionuclide activity at a crossing exceeds the average in its associated EU."</p> <p>Why does the Plan state H0 in this way? The typical expression of H0 is "no difference" between two samples, and this is what you want to demonstrate. Decrease is unlikely, because of the long half-lives of the COCs; increase would suggest deposition from higher concentrations in the Industrial Area, and is clearly undesirable.</p> <p>Population Definitions -----</p> <p>Section 2.2.3 identifies a homogeneous population of Wildlife Refuge Visitors, listing, "hike, bike, bird watch." In fact, there may be very different exposure profiles for different sub-populations. One example is that a runner will breathe faster and harder, increasing inhalation of dust, but spend less time in the area, reducing exposure to irradiation. In contrast, a bird watcher will breathe less frequently and deeply, but spend more time in the area. Similarly, a child is more-likely to ingest soil than an adult.</p> <p>Should the Plan analyze exposure to different sub-populations of likely users?</p> <p>Field Methods -----</p> <p>Section 5.1 is not clear about whether samples will be taken before, during, or after construction.</p> <p>Section 5.2 includes locating sample coordinates with a "consumer grade GPS unit." It is not clear in the Plan how important sample locations are in analyzing and drawing conclusions from the data, and whether consumer-grade accuracy is sufficient. The adequacy of this method should be explained.</p> <p>Subsurface Contaminants -----</p> <p>Public discussions of use of the Rocky Flats property often emphasize the possibility of subsurface contaminants being brought to the surface by burrowing animals. The Plan (Section 2.2.3) acknowledges subsurface contaminants, citing the 2006 study. In addition, COCs were not identified for subsurface soil/subsurface sediment in any EU. Therefore, quantitative risk characterization for subsurface soil/subsurface sediment was not.</p>	<p>Comments regarding: Null hypothesis, it was assumed that the sites to be sampled were contaminated to a level above that used in the RFNWR risk assessment, rather than assuming that the sites were clean. Our hope was to reduce public skepticism but making this assumption rather than one of uncontaminated. Population Definitions: The discussion about the various visitor populations is out of the scope of this study. Field Methods: Samples will be taken before construction. Sample locations will be mapped according to the approaches to each of the crossing sites using a WAAS enabled GPS unit surveyor grade instruments. Subsurface Contaminants: Given the likelihood that most of the radionuclides will reside on the surface, it is unlikely that burrowing activity, if any at the construction sites, will increase the concentrations in the surface soils.</p>
T.B.	<p>Stand up and fight for your rights dear friends There's something strange at work Rocky Flats nuke weapons plant They say will be a park Fish and Wildlife are saying we Will be safe there for sure Inviting all the public for A 3 hour tour A 3 hour tour Alert all your community Speak the truth we must The plan to open Rocky Flats Is dangerous and unjust Is dangerous and unjust</p> <p>ror the Dest interest of public health No trail should lay upon</p> <p>Uranium Americium Plutonium Radioactive lead The half lives of -these radionuclides Last for quite a while! 24,000 years!</p>	
D.V.	<p>I do not think you will be sampling enough of the Refuge. The entrances are not the only place where Plutonium is and the bicyclists will be entering and riding through the Refuge and exiting and taking Plutonium off the Refuge to other public places. As you can tell, I want the Rocky Flats Wildlife Refuge to be kept closed unless all of the soil is sampled and not averaged!!! Ride around the Refuge not through it!!!</p>	
C.R.	<p>What really boggles my mind is that in the state of Colorado, a far more dangerous plot of land has already been open to the public. Its contaminates are water soluble. The plum of distribution much harder to track. And the danger much higher than Rocky Flats. And that place is the Rocky Mountain Arsenal National Reserve. To say that, that is not a precedent, or somehow poses less of a risk to the community is a massive oversight. And shows great ignorance for those who choose to fight the opening of Rocky Flats. Of which the vast majority, from what I can tell do not even live near it. I am a resident of Candelas. And the reserve was part of what drove us to move there from CA. I did my research, and I understand as much as is possible not being a chemist about the nature of the contaminants, the ability to measure it, and the cases under which it might get disturbed. There is risk. But it is a calculated risk that is below getting in a car and driving the local streets. Or eating lunch and possibly chocking. By not opening the reserve the County and City of Arvada are not delivering on a promise to these future communities. And unfortunately being impacted by groups who's actual gain or loss from it opening are nothing.</p>	
M.M.	<p>Why keep this ongoing debate about the safety of the of the Rocky Flats National Wildlife Refuge. There has been ongoing testing at Rocky Flats National Wildlife Refuge during and after Rocky Flats Closure by multiply interested parties. Enough is enough; I think there is no reason to keep from opening the RF Nat'l Wildlife Refuge to the public. There a certain folks who will never be satisfied with any soil sampling no matter who does them or what the results.</p> <p>Page 24</p>	
B.F.	<p>I may be wrong, but should this pCi/gm on the top line be pCm/gm?</p> <p>This plan looks good to me. Is there any basic differences to previous plans, excluding Dr. Compton's attempt that no one else could verify? I worked at the Flats for 35.5 years in the radio chemical lab and several other production related areas.</p>	<p>The correct unit is pCi/gm = picocuries per gram</p>

A.Y.	Looking at the map of previous soil sampling it is apparent that sampling has covered the areas of risk as well as sampling along potential trails . We should place our trust in the scientific method and results and not hearsay ,rumors, and emotional speculation .	
M.M.	Why is testing only considering contaminates in the soil? Since plutonium and uranium contamination will impact plants and animals, adding testing for known chromosomal damage would seem to be a meaningful option for testing of these materials. Why does the study only presume that contaminants have been spread via atmospheric fallout or from wind blown activity? Is there some definitive testing that previously has concluded that ground water contamination or other seepage is not possible from the known plutonium and uranium contaminates?	The study is designed to assess the possibility of inhalation by members of the public. The areas to be sampled were most likely contaminated by windblown materials, not water transport. Pu in the environment is not very biologically available because the oxides of Pu are not soluble except in strong acids. Please refer to the response of comment 236.
D.G.	I am in favor of the testing project and of the eventual expansion of the Greenway through the Rocky Flats Refuge, if determined to be no more dangerous than current accepted exposure limits. The public deserves to make their own informed choices as to whether they choose to access these public properties. Local governments should provide access opportunities unless there is a clear and present danger proven.	
P.W.	You should necropsy prairie dogs, especially the females as they are notorious for remaining in the same area for long periods of time. Sample pups, yearlings and adults sporadically throughout the site.	The study is designed to assess the possibility of inhalation by members of the public. The areas to be sampled were most likely contaminated by windblown materials, not water transport. Pu in the environment is not very biologically available because the oxides of Pu are not soluble except in strong acids. Please refer to the response of comment 236.
M.H.	I feel the sampling methodology (compositing samples) and the lack of a plan to share sample results, and then allow the public to guide decisions at that point forward, make this plan incompatible with public health objectives that concern those of us living in the area.	
R.C.	I look forward to the outcome of the soil sampling. Currently I am against opening the site to the public, but the sampling might change my point of view.	
B.G.	With no plans to test the entire trail, and no testing since 2004, public health will no doubt be endangered, since elevated levels of plutonium and other contaminants on the plant site have been reported by the DOE Legacy Management at recent Stewardship Council meetings and these contaminants most likely were spread onto the Refuge by extreme weather events during the last decade. With no testing and no cleanup, it is irresponsible to know the current status and future status of the site. Please do not spend my tax dollars on this project. Re-Route the Greenway Trail around the Rocky Flats site. Thank you.	The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Both efforts are being undertaken by an independent 3rd party contractor.
P.M.	I am strongly opposed to the opening of the Greenway Plan and the Rocky Flats National Wildlife Refuge. Fish and Wildlife and the EPA have an obligation to update soil testing on the proposed bike, hiking and horse-back trails and in the surrounding areas before any members of the public are allowed to enter the contaminated site. I was present in Judge Philip Brimmer's courtroom on June 16,, 2018 and heard testimony by former Rocky Flat's employees and geologists that past errors by management of the plant are reasons for objective future testing of various areas of Rocky Flats, apart for the proposed Wildlife recreation areas. As citizen, I do not trust past govt. soil testing.	The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Both efforts are being undertaken by an independent 3rd party contractor.
J.D.	I am a retired physical therapist and was an organizer with the American Friends Service Committee, a peace and justice organization, during the 1970s, educating the community about the global threat, and also the local hazard, posed by the Rocky Flats Nuclear Weapons plant. just outside Denver. The large fire in 1957 burned through protective filters, sending radioactive nuclides throughout the metro area. Many other accidental releases of radioactive materials into air, ground and water occurred over the years. However, radioactive waste was also spread throughout the property as a method of disposal. I have seen pictures of center pivot irrigators used on the site to disperse "hot" material over the grounds. I have also spoken to an employee who was involved in incinerating "hot" waste illegally, the reason for the FBI raid in 1979. In the years following closure of manufacturing there, the site was partially cleaned up to the government's "acceptable" level of certain radioactive elements, 1,250 times average background radiation in the top 3 feet of soil, and greater amounts allowed at lower depths. 1,309 acres in the center where there remains highly radioactive material is to be sealed off forever from any contact. It must remain sealed for at least a quarter of a million years due to plutonium's slow decay process (1/2 every 24,000 years, and so on). It is critical to keep this out of our environment, as these are "low level" particles which cannot penetrate skin and are so small that you cannot see or feel them. They settle in the dust and can be either ingested, breathed in, or enter a body through a cut and enter the blood stream. There, even a tiny particle could eventually cause cancer or a genetic mutation. The Federal Government (US Fish and Wildlife) has posted no signs that tell the history of the plant for those who hike there. If there is any chance of exposing a child, let alone an adult, to rogue particles of plutonium, why would we take that chance? As a mother and grandmother, I am morally and deeply opposed to opening trails on the former Rocky Flats site. Wes McKinley, chair of the Rocky Flats Grand Jury, which heard years of now-sealed testimony but was prevented by the federal government from issuing indictments for environmental crimes, said, quote, "Kids are more vulnerable to radiation than adults. Their cells are still dividing, their bones are still growing, their teeth, too. Their bodies just absorb the stuff. "But to make a playground for kids out of a nuclear weapons plant? It's just crazy." I urge you to keep this plant and the trails closed and to post signage that alerts the public to the history and purpose of the plant and the materials used in manufacturing the bomb components there.	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities. Surface soil sample results in the Refuge indicate that doses to members of the public would be less than 1 mrem/year. On average, Americans receive a radiation dose of about 0.62 rem (620 millirem) each year. The wildlife refuge worker (WRW) and wildlife refuge visitor (WRV) models developed during the CERCLA cleanup remain the most extreme exposure scenarios assuming a lifetime career refuge worker with 50% field work (in the case of WRW) and assuming, among other complete pathways, oral ingestion of surface soils and sediments by a child (in the case of WRV). This has been and remains a very conservative bar to clear.
T.R.	I strongly oppose the opening of the Rocky Fats Refuge . This is not good for anyone. I was able to witness the testimony in court last month and am wondering why this is even being considered. I encourage people to get educated about this issue for the sake of all the citizens of Colorado and especially the children. History says it all....a concerned citizen, Teresa Ruby	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge. The FLAP partner group has no influence on the planned opening of the site.
T.R.	I am a concerned citizen and this is not good for anyone. I was able to be in the courtroom and hear testimony last month on this issue. It makes no sense to open the Rocky Flats Refuge---we need to learn from history and not sell out to greed. Where is the welfare of the people and especially the children headed? This should be the first and only priority---we must stand up for the children!	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge. The FLAP partner group has no influence on the planned opening of the site.
B.G.	Sampling of only the trail crossings at Indiana Street and Highway 128 to corroborate state and federal findings from earlier sampling is inadequate to assure public health safety. o Previous sampling methods took discrete soil samples and composited them before analyzing radionuclide levels. This methodology prevented identification of areas that had high levels of Americium, Plutonium, or Uranium that are inconsistent with public health standards. o The contractor, Engineering Analytics (EA), does not explicitly describe how the samples will be handled for analysis. It is crucial that each sample be analyzed individually and not composited. o EA states that duplicate samples will be taken, but only one sample from each site will be analyzed. More than one sample from each sampling site should be analyzed. o Samples should be analyzed at more than one laboratory, including one that is not an EPA lab. if The contractor, Engineering Analytics (EA) is to perform the "requested diligence" including public engagement and outreach. Problems: o There is no language in the EA proposal that explains how public comment will be used to guide soil sampling and analysis. o Public comment is not included in the EA Project Schedule. o There is no guarantee that public comment will be incorporated into the soil sampling and analysis. How will comments be recorded from the two Open Houses and electronically? How will content analysis of the comments be conducted? What is the expertise of those doing the content analysis "none of the principals in the EA team show qualitative data analysis experience. How will the comments analysis be shared with the public? What safeguards are being put into place to guarantee transparency in this process? o How will the findings from the analysis be shared with the public? o What actions are possible from the findings of excessive exposures to the radionuclides? The timeline in the Engineering Analytics (EA) proposal is behind schedule. What is the new timeline? Dr. Craig Little is the EA-designated health physicist and radiation toxicologist. He serves on CDPHE Radiation Advisory Committee. This could be a conflict of interest in evaluating the risk to public health and safety, considering CDPHE's role in certifying the RF Site as safe for recreational use.	The location of the crossings was determined prior to hiring EA to perform the sampling. The purpose of the SAP is to discuss how the samples will be taken. Soil samples will be discrete samples, not averages over broad areas. Duplicates will be taken at a rate of 1 per 20 samples and duplicates will be analyzed. The analytical laboratory is certified by the National Voluntary Laboratory Accreditation Program (NVLAP) operated by the National Institute of Standards and Technology (NIST). The contractors, EA and their subcontractors and employees, have no stake in the outcome of the study and are only tasked with taking samples and reporting the results.

R.A.	<p>The facts are that no "phytoremediations" of the contiguous-Whole: acreage has been given that BEGINNING FORMULA, at all. Correct or not? Not all misgivings for "hikes and Recreation" ought to be determined by a "past plutonium oasis". I have hiked the whole continent from south of Panama canal to the north-Pole--took 8-years on-off. The natural background is much more around certain types of rocks.</p> <p>Until any chance of somebody kicking-up: dusts, the problem has not been solved and the Phytoremediation-Process to my reviewing and understanding has been stranded, way back in 1998-99 w Joe Goldman's attempts for studies of retriulation(s), pu-239. There is no rush for anti-Reason, until you have studies of soils "phyto's". Period.</p> <p>The "ecology" is not the Reason, but Radionuclides can always make that a matter for less anti-matter!</p>	The location of the crossings was determined prior to hiring EA to perform the sampling.
B.N.	<p>The Open House Rocky Mountain Greenway storyboards show a conceptual render of the Greenway crossing at Indiana St. The conceptual render shows Indiana St as it is now, rather than a conceptual render of the crossing as it would be over the Jefferson Parkway. A conceptual render of the Greenway crossing at Indiana over the Jefferson Parkway should also be included in the proposed Sampling and Analysis Plan since that project will change the design and potential sampling needs for the greenway project. The conceptual render and Sampling and Analysis Plan should be based on the best available information, including consideration of other ongoing projects in the area.</p>	The Jefferson Parkway is still in pre-design phases so it is impossible to predict the areas of disturbance for that project. Indiana Street will likely remain in its current alignment per CO state requirements that a free facility always be an alternative to tolled facilities. If and when the Parkway is designed and built, they will likely conduct their own sampling efforts to correspond with the areas of construction disturbance.
B.G.	<p>Test the entire refuge, not just a few spots where the Greenway Trail connects. Understand that to open the refuge to the public is not protective of human health. Contaminants from the former nuclear weapons plant will no doubt be tracked into surrounding communities. Did the 2013 flood spread plutonium from the plant site across the refuge? What about residual contamination from the 903 pad? Do you know the current levels? No, you don't, because you are not testing. Keep it closed.</p>	<p>The purpose of the SAP is to discuss how the samples will be taken. Soil samples will be discrete samples, not averages over broad areas. The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Both efforts are being undertaken by an independent 3rd party contractor. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge. The FLAP partner group has no influence on the planned opening of the site.</p>
L.S.	<p>Sample EVERYWHERE, hot spots are all over. Do not analyze with averaging. Plutonium is not dispersible. Change the name to Rocky Flats Toxic Superfund Site and do not allow any human entry or activity for 24,000 yrs. Do not open and disturb the adjacent area with Jefferson Highway activity.</p>	<p>We will present the results of the sample point-locations, we will not average or composite. The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Both efforts are being undertaken by an independent 3rd party contractor. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge. The FLAP partner group has no influence on the planned opening of the site. Duplicates will be taken at a rate of 1 per 20 samples and duplicates will be analyzed.</p>
M.G.	<p>Please stop building trails at Rocky Flats! We don't want them, and don't think they're safe. This idea is ludicrous. Not only do we not want to recreate at Rocky Flats, we are concerned about the contaminated dust this project will cause that could be inhaled by people living downwind. Like us.</p> <p>Please halt this project immediately. The community does not want it.</p>	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.
C.R.	<p>I don't believe any public projects should be built anywhere around Rocky Flats without further testing. As a former, now retired, family physician in Arvada I took care of many patients who had multiple cancers and worked at Rocky Flats. They shared their personal information with me about how extensive the spills really were and that there was no way to contain the plutonium adequately and it should just be shut off completely. I truly cannot believe any caring person would want to risk exposing anyone to the plutonium that was there.</p>	This is precisely the effort the FLAP partner group is currently undertaking (further testing). Results of this effort will be shared with elected boards, city councils and the public.
T.F.	<p>I'd be extremely frightened to hike trails contaminated with plutonium. This project should not go forward. It's too risky.</p>	
V.M.	<p>Rocky Flats remains toxic and the dirt should not be disturbed! Having this as a recreational opportunity exposes people to horribly dangerous levels of plutonium radiation, as well as putting local water/land/neighborhoods at risk of further radiation exposure.</p>	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.
A.H.	<p>I think it's probably the worst idea ever. Why on earth would we tamper with contaminated soil and potentially expose thousands of people to radioactive materials? It's not worth it. There are plenty of trails to connect the trail system to just north of the area in boulder county.</p>	<p>Many alternatives were analyzed in the development of the proposed alignment of the Rocky Mountain Greenway Trail. Currently there is no other way to extend the trail from Jefferson County to Boulder County but through the Refuge.</p>
L.G.	<p>The lower cost, less effective method was used to remediate the property. I have no faith that it is safe.</p>	<p>Frequently "accelerated funding" is misinterpreted to mean that shortcuts were taken. This is incorrect. The EPA's accelerated funding protocol can be thought of as paying a mortgage off early. If more funds are appropriated in the earlier years of a cleanup, this will reduce the overall cleanup cost because of inflation. See: https://www.epa.gov/newsreleases/epa-announces-75-million-accelerated-funding-expedite-cleanup-colorado-smelter</p>
D.C.	<p>The best way to honor the sacrifice and dedication of America's Cold War service people -- especially the workers out at Rocky Flats -- is to make the Wildlife 'Refuge' a place apart, a sanctuary for nature devoid any further of human intrusion. Trails and paths for people to 'recreate' in this area of radiation contamination is dangerous and wrong.</p>	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.
S.N.	<p>This is not a safe piece of land for people. I will never set foot on this place with my family. If you do make the extremely irresponsible decision to open this area to the public, there better be warning signs so people know what they are exposing themselves to.</p>	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.
U.R.	<p>Insane !</p>	
R.K.	<p>My family and I are excited for this project and look forward to enjoying!</p>	
M.W.	<p>I don't think anything should be built in the Rocky Flats area, as it is still extremely dangerous from leftover radioactive materials. This site should be properly cleaned up, not opened to the public or developed.</p>	The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.
T.M.	<p>Rocky Flats is not safe. Radioactive waste doesn't just go away. Please stop building on it and please stop promoting that it is safe for people to hike, bike and live on. We are going to have a lot of people end up with weird cancers and infertility because of this carelessness.</p>	The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed.
R.H.	<p>Please don't build on this toxic ground.</p>	
D.B.	<p>There are multiple issues with the soil sampling program: 1) Sampling only at trail crossings at Indiana and Highway 128 is wholly inadequate as a means to "corroborate" previous federal and state sampling results. 2) That being said previous state and federal sampling was done by compositing discrete soil samples and analyzing them as a whole. This methodology was flawed and prevented identification of areas that had high concentrations of radionuclides. 3) The contractor hired has not supplied details describing how the sampling will be conducted; thus, the possibility is that they will also composite samples; instead samples need to be analyzed individually. 4) Duplicate samples need to be taken AND analyzed, not duplicates taken, and only one analyzed. 4) Samples should be run in more than one laboratory, and it is imperative that one lab is NOT an EPA lab. 5) There needs to be language in the contractors contract that specifies and guarantees that public comment will be used to guide the sampling analysis, and that these comments will be incorporated; 6) Craig Little has a strong potential for conflict of interest; another health physicist without potential conflicts should be designated</p>	<p>The purpose of the SAP is to discuss how the samples will be taken. Soil samples will be discrete samples, not averages over broad areas. Duplicates will be taken at a rate of 1 per 20 samples and duplicates will be analyzed. The analytical laboratory is certified by the National Voluntary Laboratory Accreditation Program (NVLAP) operated by the National Institute of Standards and Technology (NIST). The contractors, EA and their subcontractors and employees, have no stake in the outcome of the study and are only tasked with taking samples and reporting the results.</p>

M.M.	<p>I am writing with hope that you stop building trails at the defunct nuclear warhead facility Rocky Flats. I have a total of 53 years experience literally, really living in the shadows of Rocky Flats (Dow, Kaiser Hill, Rockwell International, etc). My father, brother, sister and brother-in-law all worked there for over 30 years - my sister and her spouse until the final clean up days in 2005.</p> <p>I will never forget my father stockpiling food because he feared what he was doing. I'll never forget the urine jars testing for exposure and my sister being scrubbed with wire brushes when she became contaminated as a lab tech. I'll never forget my brother with skin cancers the size of footballs and my father being exposed to Beryllium. Mostly, I will never forget the words of my brother in law, making thousands of dollars on the clean up crew - "You wouldn't believe the stuff we are doing." Knowing full well, he was not being careful, he was not following protocol but, focused only on the money he was making and not the safety of our community. Then, he tried to double dip into the injured workers fund when he developed prostate cancer.</p> <p>I can go on and on. My brother having to quit his electrical engineering position there when he could no longer sleep at night. My father still not talking about his experiences but having described folks literally just sweeping up stuff after a spill and being silenced when my sister was still employed there because he feared for her job. I will never forget 9/11 when the plant went on lockdown because of the planes crashing into the World Trade Center and my sister facing execution if she were to try and leave the plant.</p> <p>I have never had children. Who knows what my father was bringing into the house during my developing years. But I do know, he brought his anxiety home. His silence. His fears and his knowledge about very dark secrets.</p> <p>Do not keep building trails.</p> <p>Sincerely,</p> <p>NAME REDACTED</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
A.H.	<p>You cannot ignore the data, and evidence that the radioactivity in that area is NOT SAFE! Please STOP!! This will have irreparable consequences for so many! The contaminated dust ALONE that will blow onto our homes where our children play, is enough reason not to disturb that land! You will have to live with this he rest of your life, and so will so many others!</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
P.P.	<p>Do not open it. It's unfair to children and tourists that don't know the history. There's plenty of Open Space nearby. The only thing unique about it is the nuclear history.</p>	<p>The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
D.F.	<p>I am concerned that the soil sampling process described in the proposal is woefully inadequate and that there is no guarantee that public comment will be incorporated into the soil sampling and analysis or shared with the public. I don't see any indication of a proposed new timeline, given that the current timeline is behind schedule. I am also concerned about a conflict of interest in the designation of Dr. Little as health physicist and radiation toxicologist given his membership on the CDPHE Radiation Advisory Committee.</p>	<p>The contractors, EA and their subcontractors and employees, have no stake in the outcome of the study and are only tasked with taking samples and reporting the results.</p>
K.F.	<p>Please stop building trails at Rocky Flats! They are completely unnecessary, and create a public health risk!</p>	<p>The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
A.R.	<p>This is a nuclear waste site and plutonium is NOT safe. It should NEVER have become a Wildlife Refuge.</p>	
B.F.	<p>Rocky Flats National Wildlife Refuge is not safe for recreation. It is a danger to the community and should be left out of any linkage plans. The land should remain undisturbed and off limits to humans. I will never go there, and would recommend others do not go there. I worry that Jefferson County will one day be responsible to those who become ill due to contamination from Rocky Flats.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
B.B.	<p>Please don't build trails and allow the public on a site that is contaminated with plutonium and other radioactive materials</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
D.S.	<p>I do not agree that people should be allowed on that dangerous property. Testing needs to be done to see how toxic the property is.</p>	<p>This is precisely the effort the FLAP partner group is currently undertaking (further testing). Results of this effort will be shared with elected boards, city councils and the public.</p>
B.S.	<p>This is a completely unnecessary project that will disturb soils not proven to be free of radioactive materials from the Rocky Flats era. This project needs to die.</p>	<p>This is precisely the effort the FLAP partner group is currently undertaking (further testing). Results of this effort will be shared with elected boards, city councils and the public.</p>
M.H.	<p>The Greenway trail-has been moved twice. Now it is shown on the most contaminated area of the Refuge. 903 Pad and lip area. The trail belongs alongside Indiana, notbthrough the South Refuge area. The proposed sampling plan is terribly flawed.</p>	<p>The Rocky Mountain Greenway proposed alignment within the Refuge was chosen to minimize impact to natural resources and to minimize construction and earthwork activities. The closest any trail comes to the 903 pad is approximately 3/4 of a mile.</p>
M.M.	<p>Contaminated! Platonium barried over, still on site. Recommended you interview the workers who closed the plant. Blue prints of the sewage system do exist. Radioactive material still lives underground through the the plants buried sewer system.</p>	<p>There are no known point-sources of contamination in the peripheral operable unit (coincident of the Refuge).</p>
S.M.	<p>I am writing to request soil samples taken in the presence of multiple parties interested in the safety of Rocky Flats proposed refuge. That this soil sampling has never been done would resolve the issue of surface soil containing particles that are dangerous to inhale, plan a walkway, or just close this refuge to humans, as originally planned. I attended a lecture presented by the Jefferson Unitarian Church approximately 5 years after the completion of the clean up. The person in charge of that clean-up assured the audience that" no human being will ever walk within the grounds of Rocky Flats." I want that promise to be kept.</p>	<p>The FLAP partner group is working with numerous outside interested parties for oversight of the soil grabs and sharing of split samples. Details of this arrangement will be published on the project website once the arrangement is finalized.</p>
N.L.		
L.M.	<p>I do not want to see it built because of the threat to citizens safety. It is disheartening that the city officials of Arvada care more about a project completion than the people's health. This project should never ever move forward</p>	<p>The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
D.M.	<p>When we have issues with people misusing our parks and trails. Why would you trust the population on RF property? Candela should never have been built. But it seems we are more concerned with money than safety of our community.</p>	
C.M.	<p>Overall, I think the project is a wonderful effort. However, any linkages involving the Rocky Flats Wildlife Refuge are ill-conceived and should not be completed. The federal government has spent decades lying about and covering up the contamination of that land. There's absolutely no reason to trust that same government when they tell us that the area is safe. Taking their word for it is the height of naivete.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>

P.G.	<p>This is a very Trumpy idea. That is not a compliment. Candelas wants their houses next to parks, not toxic messes, so your solution is to rename the toxic mess a "Greenway". You are not helping a community, you are sucking the d***s of developers and everyone knows it no matter what "green" spin you try to put on it.</p> <p>You should be ashamed of yourselves.</p> <p>Candelasglows.com</p> <p>Stop this bad idea now.</p>	<p>The idea for the Rocky Mountain Greenway was conceived by John Hickenlooper and Ken Salazar and has nothing to do with the current administration or quid-pro-quo favors.</p>
R.B.	<p>You are dealing with 90 pages of toxic chemicals and heavy metals and plutonium. Close down the site forever. It is dangerous. It is toxic.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
J.A.	<p>This is a terrible idea especially considering the health and well being of the public. Itâ€™s already a known fact about the radiation that has leached into Stanley lake and rests in the bottom... itâ€™s bad enough this supplies water to jeffco.</p> <p>Let alone the rocky flats contamination is going to last tens of Thousands of years. Having walking trails and recreation here is NOT SAFE!</p> <p>Please cancel this project or factor in money for future law suits by sick public.</p> <p>Long term goals to recreate on radiated lands?! This is not a joking matter</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities. Water and sediment samples at Standley Lake (that supplies Broomfield) are taken regularly and presented to the Rocky Flats Stewardship Council and are available to the public.</p>
K.N.	<p>I donâ€™t agree with putting people in harms way of radiation just because they arenâ€™t educated about past practices occurring on this location</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed.</p>
V.S.	<p>Exposure to radiation through the opening of Rocky Flats National Wildlife Refuge to recreation is dangerous to visitors and residents of Jefferson County and Colorado. There is a reason why school districts are not sending their students there. Please reconsider this dangerous plan. There are plenty of other fine places to recreate outdoors in Jefferson County</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
M.K.	<p>I'm concerned about the continued impact of the toxic site. Community members are still experiencing high numbers of rare cancers. I'm worried about the exposure, especially to our youngest members and exposure as they touch things and put dirty hands in their mouths. I'm not sure when the site will truly be "cleaned", but the research I've seen are at both extremes which means the truth is somewhere in the middle. That tells me it isn't completely safe. My family won't be visiting and my children won't be allowed to go on field trips at school there.</p>	<p>Numerous peer reviewed, longitudinal health studies have been conducted analyzing cancer and rare-cancer rates in communities 'downwind' from the site. Those studies show no increase in cancer rates for the study areas when compared to the rest of the Denver metro area. Those studies are available here: <https://www.colorado.gov/pacific/cdphe/cdphe-rocky-flats-cancer-study></p>
A.L.	<p>With all the open spaces in the front range and beyond, there is no reason to be opening a former plutonium factory, that has not conclusively been prove safe, to the public. Those that are not aware of the history of the space will be exposed unwittingly. This is not good governance.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
J.B.	<p>There should be a stay on opening the Rocky Mountain Greenway Trail while further tests and testimony are taken. Efforts so far to corroborate state and federal findings (that the land was safe) were taken only at Indiana Street and Highway 128 and then composited before analyzing radionuclide levels.This method prevented identification of areas with higher levels of Americium, Plutonium, and Uranium that would not meet public health standards. Samples from various sites should be analyzed by more than one laboratory. I would like more specifics about how public comments will be figured into the decision to allow humans onto this potentially dangerous ground. What is the new timeline for making this information public? The DPHE has not been helpful in evaluating the risk to public health and safety by certifying the site as safe. As a mother, I am particularly concerned about potential harm to children who might visit the refuge. Their growing bodies are more sensitive to carcinogens and radioactivity. It is in my community's interest to visit the many other trails and parks available in our area rather than take the potential risk of exposure to poison in the Wildlife Refuge.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. We will present the results of the sample point-locations, we will not average or composite. The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Both efforts are being undertaken by an independent 3rd party contractor. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge. The FLAP partner group has no influence on the planned opneing of the site.</p>
A.Z.	<p>I am shocked that the trail systsm at the site of Rocky Flats is even being considered. There is more than a little evidence that highly radioactive material persists both in and on the soil. The public needs to be made aware of the potential health risks and kept from disturbing the area and local governments should be protecting their consituents from the irresponsible actions taken by the federal fish and game folks.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
H.B.	<p>This is very irresponsible and completely ignores the facts about health and risks of the area. I hope that JeffCo chooses to care about the health of the people who are not informed about what happened there and how long it will have an effect on the soil.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.</p>
D.S.	<p>The refuge has emergency monitoring, with emergency plans in place, that's ongoing which is an admission that it's not safe as the government claims. There would be no emergencies possible if the land was truly safe.</p>	<p>CERCLA regulations within Legacy Management stipulate that former Superfund sites be continually monitored to ensure controls and remedies are functioning properly. Emergency plans are also standard procedure.</p>
S.B.	<p>The Rocky Mountain Greenway Project should never be allowed to happen. The detrimental effects of the uranium contamination in the area mean that people should never be on that land. Even with all the studies that suggest that the danger is low, the reality is that the land is contaminated and should never have humans on it.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed.</p>

J.L.	<p>The purpose of this communication is to request that the Jefferson County, Colorado withdraw its support for the their FLAP grant application of August 2016. The Rocky Mountain Greenway (RMG) through the Rocky Flats NWR (RFNWR) conditions articulated by the City of Boulder, Boulder County, Broomfield and Jefferson County are not being met, among other things.</p> <p>On May 3, 2016 the City of Boulder Guidelines for Subsequent Environmental or Land Use Review or Permitting Processes for Trail Connection to Rocky Flats National Wildlife Refuge insists on a complete and thorough analysis in accordance with the National Environmental Policy Act (NEPA); the NEPA process shall incorporate an analysis of soil conditions on Rocky Flats NWR to affirm public safety; and maintains that either an environmental assessment (EA) or environmental impact statement (EIS) may be required to develop reasonable alternatives for locating and designing up to two underpasses and trail connections at #1).</p> <p>The RFP for the SAP does not reflect the intent of the Jefferson County Commissioners. The planned SAP process is not in sync with the opening of the Refuge. David Lucas, USFWS, issued an undated letter that USFWS would cooperate with such an SAP, and, on May 10, 2016 a USFWS official testified, under oath, that USFWS would facilitate the SAP. The process should be complete not segmented otherwise a waste of taxpayer funds.</p> <p>Section 16 was scoped by USFWS in August 2011 where debris and an unmarked white (with patina) 55-gallon drum was photographed in the Claystate Mine pond. The State of Colorado removed the drum and debris but no record exists that the area was tested or remediated for Rocky Flats radioactive or other hazardous substance contaminants. Rocky Flats operations utilized 1000's of white drums for radioactive waste. Blue and orange drums were also utilized at Rocky Flats. Yet USFWS did not conduct a Level III sampling protocol for radioactivity. Section 16 should be scoped for radioactivity as soon as possible with a priority over the Indiana Street and CO-128 connectors.</p> <p>On March 23, 2018 US Fish and Wildlife Service (USFWS) issued its Categorical Exclusion (CE), not an EA or EIS, in approving the Rocky Mountain Greenway through the RFNWR. David Lucas, USFWS, is the co-applicant of the August 2016 FLAP Grant 2016 along with Jefferson County. Mr. Lucas knew or should have known that the City of Boulder expected a thorough NEPA process via EA or EIS; and, City of Boulder, Boulder County and Broomfield all expect an acceptable soil analysis plan (SAP). In addition Greg Stokes, Mayor Pro Tem, City/County of Broomfield wrote in his May 10, 2016 letter Broomfield expects split samples of each testing location site shall be collected and provided to the local communities. The latter request for split samples is important for an independent verification.</p> <p>It is also my concern that the Rocky Flats National Wildlife Refuge Act (The Act) of 2001 in regards to the Comprehensive Planning Process provision has been overlooked to expedite the FLAP Grant 2016 process. (P. Law 107-107 at Â§3178). The Act states that a comprehensive planning process is to involve the public and local communities. The Secretary of Interior was to establish such process in consultation with several identified entities to include the Coalition. (Ibid at (a)).</p> <ul style="list-style-type: none"> The Town of Superior is a member of the Coalition. (Ibid at (e)(5). The Town of Superior was not included, as it should have been, in the RMG through the RFNWR planning process; On May 10, 2016 then-Commissioner Don Rosier, Jefferson County, directed his staff to include the Rocky Flats Technical Group (RFTG) in the SAP process. Jefferson County Open Space denied the RFTG from participating in the SAP process because then-Commissioner Rosie misspoke. The RFTG was not involved in the SAP planning process. 	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities. The US Fish and Wildlife Service (USFWS) has said many times that it plans to complete the appropriate NEPA analysis for the FLAP crossings and any additional construction to connect these crossings to the Refuge. The USFWS is currently in contact with the Partner Group to initiate an Environmental Assessment (EA) in compliance with NEPA. The NEPA process is driven by the federal government and it is inappropriate for local jurisdictions to promise members of the public anything related to the USFWS NEPA document.</p> <p>Further, it should be clarified what the proposed action is. It is whether or not to work together through the FLAP partnership to construct a box culvert under State Highway 128 and a non-motorized bridge over Indiana Street (FLAP). It is whether or not to construct trails to connect these FLAP crossings to the refuge's trail system (Federal Lands Transportation Program or FLTP). It is whether or not to make improvements to trails on the refuge (FLTP) and, if the project proceeds, would these actions have a significant effect on the human and natural environment. Anything else is not the proposed action.</p>
K.R.	<p>People that have lived or worked in the area of the former Rocky Flats Nuclear Weapons Plant have developed exotic forms of cancer and other diseases in the last few decades. Development of any kind should be halted on this toxic land. It is not safe for humans or animals.</p>	<p>Numerous peer reviewed, longitudinal health studies have been conducted analyzing cancer and rare-cancer rates in communities 'downwind' from the site. Those studies show no increase in cancer rates for the study areas when compared to the rest of the Denver metro area. Those studies are available here: <https://www.colorado.gov/pacific/cdphe/cdphe-rocky-flats-cancer-study></p>
J.S.	<p>Greetings Jefferson County, The Rocky Mountain Greenway Project may or may not ultimately be a great tourist attraction and/or recreational project for residents in the state of Colorado. The idea to use potentially radioactive land surrounding a former plutonium-pit factory that was in operation for decades with a half-life of 24,100 years is too well-known and accepted as 'scientifically dangerous'. There was no possible way that human laborers were able to clean up that waste in a manner that was completely 'safe' for all living citizens during the Superfund cleanup period that ended in 2004-2005. This is no longer interesting as the facts presented conflict with ideas of a possible radioactive-free land area beyond a reasonable doubt. The possibility of harm is not worth the decision to proceed with construction and risk as it may impact the living progeny of all citizens including those of government employees and officials for many generations.</p> <p>Colorado is one giant outdoor recreation state. There is no disputing that from an onlooker who has experienced major metropolitan living. Position-holders must strive for better perspective about where they are and live before making 'poor' and potentially 'life-threatening' decisions as the details of this project currently present.</p> <p>Please find another way to create and construct in a way that does not conflict with such aforementioned issues.</p> <p>Thank you,</p>	<p>The FLAP partner group is working with numerous outside interested parties for oversight of the soil grabs and sharing of split samples. Details of this arrangement will be published on the project website once the arrangement is finalized.</p>
P.K.		
P.J.	<p>This project is a unique and forward-thinking opportunity to make pristine wildlife areas available to the public. Millions of data points, years of scientific study and the expertise of multiple state and federal health and science agencies confirm that the Rocky Flats National Wildlife Refuge is safe for the public. The Greenway project and the vital link that runs through Rocky Flats should not be stymied by the parochial views of a small group of professional actives who base their opinions on inaccurate, non-scientific information compounded by unsubstantiated conspiracy theories and an agenda that opposes anything that doesn't fit their narrow perspectives. Do not allow their organized effort to flood this public comment process to be the determining factor on Rocky Flats and the Greenway Project. Elected and public officials owe their constituents more than their vote --- they owe them their judgment. Use your judgement to weigh the scientific and public benefit evidence that overwhelmingly comes down on the side of completing the Greenway project with a link through Rocky Flats.</p>	
M.W.	<p>Regarding the testing, I trust Michael Ketterer to do testing. He has excellent credentials, training, and experience. I trust the Rocky Flats Technical Group made up of specialists and scientists.</p>	<p>The FLAP partner group is working with numerous outside interested parties for oversight of the soil grabs and sharing of split samples. Details of this arrangement will be published on the project website once the arrangement is finalized.</p>
G.H.	<p>I support the Rocky Mountain Greenway Project and reasonable access to open spaced, but not on Rocky Flats. Access to Rocky Flats Wildlife Area entails risks that most of the population and Fish and Wildlife managers do not appreciate or fully understand. There is a larger area of risk exposure involved which may not be represented by the proposed sampling sites and techniques. More samples need to be taken along proposed trails and visitor center site to insure that the amounts and movement of Plutonium, Americium and enriched Uranium, both by air and by surface water/groundwater are identified and understood. I worked for the Region 8, EPA at the time of the shutdown/cleanup, have training in radiation physics and geology, and understand the cleanup was not done to the level required for normal waste disposal sites, let alone a 24000 year half life radiation pollution site. The potential radiation risks to trail users and nearby residential communities do not justify opening Rocky Flats Wildlife Area.</p>	<p>The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. We will present the results of the sample point-locations, we will not average or composite. The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Both efforts are being undertaken by an independent 3rd party contractor. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge. The FLAP partner group has no influence on the planned opneing of the site.</p>

Please read Quentin Young's editorial "Do not open Rocky Flats to recreation" (Boulder Daily Camera July 29, 2018). I'd offer these points based on 44 years of criticizing that site for health and safety reasons.

1) The entire Refuge was dusted with plutonium particles routinely released by four decades of industrial operation, officially admitted in 1987. This explained my finding during my mid-1970s DOE research contract that snowfall in what is now the Refuge was "hot" full of radionuclide particles released all over the Refuge area. The Refuge was not cleaned up, so plutonium dust remains there, liable to be breathed in, the most dangerous exposure according to EPA. All documented and officially admitted.

2) People assume they are protected by EPA and CDPHE studies if they visit the Refuge (they wouldn't let us come to any harm, would they?). But officials admit "a small risk" and they do not use critical thinking about the dangers. The risk models they use are debatable and do not allow for changes in radiation exposure standards as science advances. They assume the current standards are perfect, good forever, but such standards repeatedly change, always conservatively, since the 1940s. Those Refuge standards were negotiated, limited by congressional spending and are somewhat arbitrary. DOE says what is acceptable at the Refuge will apply to all DOE national sites, so what they can get away with here will save them billions. Does this explain their promotion of Refuge recreation? Note they're paid to promote it!

3) Dr. Tom Hei et al. of Columbia University reports from experiments "a single alpha particle" (as from plutonium dust at the Refuge) "can damage mammalian cells" (letter to this writer, 2018, and PNAS 1997). Possible genomic damage and multi-generational effects are not addressed by Refuge managers, who promote the site without the due diligence that admitted cancer risk requires. Their official visitor risk is greater than the lightning death figures for Colorado, but when we go into the mountains don't we beware thunderstorms to avoid that risk? See the similarity?

4) Longterm contact with Rocky Flats managers shows that their thinking is bureaucratic and dangerously shallow. EPA and CDPHE depend on DOE for risk data when they should have their own independent "devil's advocate" studies. Instead these agencies hang together for mutual support against their citizen critics. Trust these bureaucrats at your peril.

H.N.

The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities. The term "plutonium dust" is misleading. A more appropriate term might be "plutonium attached to soil particles." It is important to note that alpha particles can damage cells if the particles end up in close proximity to the cell inside the body. The key is transport and how the particles are able to be inhaled. The presence of the lush grassland at RFWR is very effective at limiting the amount of dust in the air.

When speaking with the representative from the privately contracted sampling company who attended the public input meeting at the Boulder Rec Center, I learned that the three employees who will be collecting soil samples from the target areas will not be wearing any protective clothing but closed toed shoes and disposable vynil gloves. I was told this is due to their not having any reason to believe there is radioactive contamination. However, the point of the "independent study" is to provide non-biased scientific data. It seems to me the sampling process is already compromised by the contracted company to begin with the belief that there is no contamination, even risking employee safety by not taking every precaution in sampling. Furthermore, there is no plan to treat collected samples as if they were potentially hazardous. The disposable gloves will be treated as normal trash, no preventative measures will be taken to restrict transfer of soil from shoes or clothing to employees' homes or the greater community, nor will soil samples be handled in accordance with what is appropriate for radioactive contamination.

I am deeply concerned for the well-being of employees, ramifications for public health and deeply question the integrity of the proposed sampling procedure due to its lack of bias and negligence in protocol and safety.

K.G.

Please rethink the proposed soil study and explore truly independent sampling agencies, possibly having several agencies, and scientific groups doing the sampling so as to have many data groups to compare.

I would also like to see an expansion of the soil sampling area, as well as increasing sampling depth from 2" to much greater depth, as soil is regulary dislodged by the elements, fires, floods and seismic activity.

The US Geological Survey would have the necessary equipment to do such testing. Perhaps they could work collaboratively with non-profit agencies that serve to protect public health and natural resources.

There must be precedence to follow in appropriate testing and reporting the kind of nuclear contamination that exists at Rocky Flats, as it unfortunately is not the only super-fund site in the US or worldwide. And if a thorough precedence is not to be found then it is time to change the culture of cover-ups and lies regarding these areas of contamination, with transparency and ethical, exhaustive study to protect our resources and the health and safety of trail and construction workers, industry providers, residents of Denver, Boulder, Golden, Lakewood, etc., etc.

I ask you to please exercise a moral authority to employ every precaution, skepticism and reserve in decisions to open this hazardous area to public recreation and implore you to impose greater restrictions to use, access and development of the area surrounding Rocky Flats Nuclear Weopons Manufacturing Site.

The contractors, EA and their subcontractors and employees, have no stake in the outcome of the study and are only tasked with taking samples and reporting the results. EA will develop a health and safety plan prior to starting field work.

M.S.

My 1st concern it that this is a one-time collection of soil samples to confirm the activity of radionuclides in the areas where Project-related construction will be performed. Why is there not an additional collection of soil samples scheduled in, if not several?

2nd: The Key for Figures 1-3 are not legible. How can I know what I'm referencing? Is there a high resolution document that can be uploaded?

3: Is there a conflict of interested with EA doing the testing while employees there are also evaluating the risk to public health and safety? It seems like the organizations involved should be mutually exclusive if only for public opinion and especially for the safety of the site.

4: What is my opinion and comments even worth to you? How do they affect the SAP plan??

Responses to comments: 1) The SAP is being developed to collect samples to inform the FLAP about potential risks related to this project. The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Further, post-closure monitoring and sampling of contaminants and contaminant transport already takes place under Department of Energy's Legacy Management program. 2) The figures will be revised for better readability. 3) The contractors, EA and their subcontractors and employees, have no stake in the outcome of the study and are only tasked with taking samples and reporting the results. 4) See number 2 above.

J.H.

I am the widow of a man who died of radiation-caused lymphoma while he was still fairly young. He had worked in the industry for only 6 years and always used the precautionary methods required to "keep him safe". When the government offers to compensate me for his death, I think they are acknowledging that their safety standards are not really safe. The best use for this land is to fence it off and leave it alone.

The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opneing of the site or of the development of trails and other facilities.

N.W.

Samples should NOT be composited, but tested in several places per site and taken to more than one independent lab to insure a true test result of what is in the soil, and at multiple areas. Public comments need to be part of the sampling and analysis. How will this be done and what is the expertise of those doing it? How will the findings be shared with the public? What will happen if they find excessive Plutonium exposures to the radionuclides? I have an issue with Dr. Craig who is serving on the CDPHE Radiation Advisory Committee. This could be a conflict of interest considering CDPHE's role in certifying the Rocky Flats site for recreational use. The Rocky Flats refuge area has NEVER been cleaned up or remediated! Wind blown plutonium is also on land all around the refuge site as well as under Indiana Street. Unless the soil tests are done accurately and double blind tested showing NO risk, the refuge should never be opened nor a parkway built on Indiana! One particle of PU is enough to kill you. There is NO SAFE level if Plutonium is found!

The FLAP partner group is comitted to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. We will present the results of the sample point-locations, we will not average or composite. Furthermore: The FLAP partner group is working with numerous outside interested parties for oversight of the soil grabs and sharing of split samples. Details of this arrangement will be published on the project website once the arrangement is finalized. The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations. Both efforts are being undertaken by an independent 3rd party contractor. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge. The FLAP partner group has no influence on the planned opneing of the site.

	<p>Environmental Information Network (EIN), Inc. Paula Elofson-Gardine, Executive Director 1218 S. Brentwood St Lakewood, CO 80232 303-233-6677</p> <p>August 23, 2018</p> <p>To Whom It May Concern:</p> <p>The Rocky Mountain Greenway Project is ill conceived, and should be re-routed so that it does NOT encroach on the former Rocky Flats Nuclear Weapons Facility buffer zone.</p> <p>The sampling plan is inadequate, and will not guarantee public health or safety in any way whatsoever. Most of these Orwellian studies have been undertaken with methodologies and sampling strategies that may mix and/or average results. That minimizes high readings to avoid validating the extent of the contamination at Rocky Flats.</p> <p>The USEPA and CDPHE should be held culpable for their failure to adequately protect public health and safety in these matters. They have failed to use the most sensitive sampling methods. They have failed to monitor this site for migration, and redistribution, especially after flood and high wind events. Construction has occurred with no appropriate oversight, soil wetting, and/or monitoring during earth disturbances. The health effects are already being seen in Whisper Creek and 5 Parks subdivisions, which should never have been built, according to CDPHE's former Executive Director Roy F. Cleere. Candelas will be next. Who will be held responsible for the public health debacle? To encourage and allow public access for recreation here should be a crime against humanity.</p> <p>The Rocky Flats buffer zone has not been properly characterized. Rocky Flats Steelworker Union minutes and testimony found in the Marcus Church v. U.S. Government Plaintiff Pretrial statements indicate widespread use of the Rocky Flats buffer zone for disposal and burial of radioactive and chemical wastes and equipment.</p> <p>According to George Setlock's Radioecology and Airborne Pathway Report, evidence of Plutonium, Americium, and/or Uranium contamination has been found in the fecal pellets of all the animals found that accessed this site. Burrowing animals, which are prevalent at Rocky Flats, are excellent vectors for redistributing the contamination at this site. Rocky Flats Steelworker Union President Jim Kelley has been quoted in several interviews that they would catch rabbits on site and check them for contamination. His description was: "They were hotter than a pistol," and the magnitude of their contamination shocked even him.</p> <p>The Actinide Uptake in Cattle Grazing Around the Rocky Flats Plant study, done by the USEPA, Las Vegas office, compared a Rocky Flats cattle herd that grazed seasonally (3 months of the year) compared to Nevada Test Site cattle that grazed year round. The Rocky Flats cattle were found to be far more contaminated, especially in the gonads and trachea-bronchial lymph nodes. This was attributed to the persistent radionuclides in the</p>	
P.E.	<p>I attended your meeting about the sampling plan and would like to voice a concern specific to that aspect. I spoke directly to someone who said he is going to be doing the sampling, and first of all I'm concerned about those workers' health. They are going in under the assumption that the sampling will show those entry areas to be safe. He said he was not going to be exercising all the precautions of entering a plutonium-contaminated area. They will wear gloves and have some surface protections, but they'll be bringing their boots and clothes and all that back to their families. They appear very predisposed to find the area safe, and I worry that they will endanger themselves and their families in that presumption. Secondly, when I asked if they (the third party that won the contract to do the testing) would be doing further testing for the inner areas of Rocky Flats he said that contract has not been offered yet. He said his company could potentially get another contract to test the other parts of Rocky Flats. That provides a direct financial incentive for them to clear the entry areas. Is this not a concern? There are a number of websites dedicated to the concerns of citizens that have been directly or indirectly affected by the contamination at Rocky Flats, yet almost everyone I spoke with at that meeting and at prior meetings seem to be oblivious to the victims' plights. Even the Jefferson County Commissioner in one of the sharing session said he'd never met anyone that got sick from living near Rocky Flats while we had first hand victims at that very session.</p> <p>When I vocalized concern about the health impacts and safety questions I had a couple of people at that meeting tell me it was up to us, the citizens, to prove the area is not safe. Of course, I am not a scientist and have a full-time job and family to which I must attend. But why are the experiences of the sick and the dead from the area not taken into consideration as scientific evidence? It should be up to the people who want to open that area up to prove that it IS safe.</p> <p>This whole process has seemed very closed off and organized to suppress public push-back. I don't know why the public is relegated to post-it note questions and an online comment section, but I find it disappointing. And I find it disappointing when we're asked to leave our 1st amendment rights at the door like when we were told before a couple meetings that we weren't allowed to bring signs in. I would just like to comment that the invitation for public input becomes disingenuous and condescending at best when these meeting don't allow for full, open discourse and public questions and answers.</p> <p>I would also like to comment that everyone I did speak with at the sampling meeting eventually said, "that's not my area, you want to talk to someone else." So, it became a practice of going person to person to person and never getting a full response. There appears to be so many different responsibilities in this project that no one can even speak to or justify their own position and responsibility in the whole of it. Everyone's "just doing my job". This belies a complete disregard for accountability.</p> <p>I will just end by saying that I am against this project, and I have seen nothing that indicates to me that the safety concerns are being taken seriously.</p>	<p>Engineering Analytics (the consultant) was selected by the FLAP partner group through a competitive bid process to perform soil sampling and analysis and present the empirical data, not to provide recommendations about the site's use. There is no incentive to "tip the scale", as is alleged. Furthermore, the consultant is following proper safety protocols based on the characterization of the contamination and analysis of the data (which is provided in Section 2.2 of the Sampling and Analysis Plan). The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. We will present the results of the sample point-locations, we will not average or composite. Furthermore: The FLAP partner group is working with numerous outside interested parties for oversight of the soil grabs and sharing of split samples. Details of this arrangement will be published on the project website once the arrangement is finalized. The US Fish and wildlife Service intends to sample the Greenway trail within the refuge where construction and soil disturbance will take place. It is the intention of the FLAP partnership to present the results of this effort along with the results of the sampling at the FLAP crossing locations.</p>
S.D.	<p>Our law firm, Gablehouse Granberg, LLC, represents the Town of Superior. On behalf of Superior, we emailed a comment letter regarding the Draft Sampling and Analysis Plan for the Rocky Mountain Greenway Trail Crossings to the Greenway partner group on August 23, 2018. A list of recipients was included with the email.</p>	
	<p>We ask that the comment letter be accepted via email and made public on the same terms as comments submitted through this online system. This system does not allow documents to be uploaded and the comments were too long to cut and paste into the space provided.</p>	
E.S.	<p>Please contact me if you have any questions or concerns.</p> <p>Sincerely,</p> <p>Evan Singleton for Gablehouse Granberg, LLC Attorneys for the Town of Superior 303-572-0050 esingleton@gcglc.com</p>	
S.G.	<p>Rocky flats area should not be used. Route greenway nearer to Standley Lake area & avoid the battles that will be ongoing.</p>	<p>The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed.</p>
W.H.	<p>There must be more studies of the area. Such studies must be executed by private, disinterested companies, not government agencies, not any group related to the Rocky Flats company, or anyone related to ownership of that land. It makes no good sense to expose citizens to danger. Dangers, of any level, can and should be known. Thanks</p>	<p>The contractor (Engineering Analytics) selected to perform the Sampling and Analysis was procured through a competitive bid process without involvement from the State of Federal agencies.</p>
D.G.	<p>In my reading I find the sampling inadequate. Colorado has many recreation areas. There is no need to endanger the lives of our citizens. Please consider the health of ou people before economics.</p>	<p>The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. There are no financial incentives for Jefferson County, the FLAP partner group or the US Fish and Wildlife Service.</p>

K.R.	<p>Enough sampling was conducted to prove that Rocky Mountain Greenway sites still contain plutonium contamination in concentrations that are several orders of magnitude above both background levels and Colorado's standard for construction activities, which is 0.9 pCi/g. This is an unacceptable risk to human health and safety, and to the communities that surround the Rocky Flats site.</p> <p>The rebranding of the site as anything other than a former Superfund site still harboring plutonium contamination is disingenuous and potentially harmful to otherwise uninformed visitors. The State of Colorado and Jefferson County have a responsibility to protect the public welfare, and exposing them to possible plutonium contamination under the guise of a clean, healthy, "green" nature experience is shockingly deceptive.</p>	<p>The Colorado State occupational annual radiation dose limit is 5 millirems (mrem) per year above background (6 CCR 1007-1 Part 04, Section 4.6). In the most contaminated part of the Refuge (the Wind Blown Area Exposure Unit) this corresponds to an annual dose of 0.3 mrem for an adult Refuge worker, the most extreme exposure scenario.</p>
S.G.	<p>By not engaging in an unbiased, third party assessment of safety and basing warning signs and public access on meaningful data, you are placing the public at risk. Don't have your names go down in history as careless government officials who put citizen safety in jeopardy.</p>	<p>The contractor (Engineering Analytics) selected to perform the Sampling and Analysis was procured through a competitive bid process without involvement from the State of Federal agencies.</p>
J.L.	<p>While the use of this area surrounding the Rocky Flats nuclear Weapons Plant as a wildlife refuge is appropriate, the opening of it to recreation does not seem wise. There are other recreational trails in the area. The entire radioactivity problem may be overblown but why take the chance?</p>	<p>The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed.</p>
J.M.	<p>Both proposed and prior sampling methodology to determine soil radiation-hazard level throughout the RM Greenway Project area appear to be totally inadequate. Recreational use of the area should be prohibited until acceptable radiation-hazard levels are established.</p> <p>Figure 2-2 of the proposed Sampling and Analysis Plan shows a large part of the recreation area for which most measurement points exhibit contamination levels of Plutonium 239/240 that as high as 9.8 pCi/gm. These contamination levels throughout the area are ~ 9.8 times higher than the 1.1 pCi/gm average levels cited on page 17 of the CDPHE Publication, "Rocky Mountain Flats :Myths and Misunderstandings."</p> <p>Furthermore, "Colorado's permissive standard for plutonium in soil: In Democracy, Environment, Jefferson Parkway, Nuclear Guardianship, Plutonium, Public Health, Rocky Flats on June 23, 2013," states "Carl Johnson, Director of the Jefferson County Health Department, . . .and two U.S. Geological Survey colleagues employed the innovative method of sampling only respirable dust. Dust samples taken at 25 locations showed plutonium concentrations on average 44 times greater than what had been measured at the same locations by the state using whole-soil samples. Several readings exceeded previous ones by 100 times or more, one by 285 times."</p> <p>Because the sampling measurements appear to correspond to deeper sub-soil sample depth, the contamination levels for respiratory dust throughout the area can be as much as ~ 9.8 x (44-100 or more) = 430-1000 or more times higher than the average levels of 0.5 mrem cited in the CDPHE Publication. These potential human dosage levels are ~9-20 or more times higher than the State specified individual-exposure threshold of 25 mrem.</p> <p>I request, therefore, that no further recreational use of the RM Greenway be permitted until acceptable surface-dust contamination levels are established throughout the area.</p>	<p>This study is not intended to be a replacement for the RFNWR risk assessment study. The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.</p>
J.B.	<p>Long term this will be a tragic mistake. Unseal the Federal records and hold open public hearings to understand why we should not pursue this project.</p>	<p>For an court's explanation of Grand Jury secrecy justifications, please see In the Matter of the Application of WP Company LLC d/b/a The Washington Post for Access to Certain Sealed Court Records (August 18, 2016), 201 F. Supp. 3d 109, U.S. District Court, District of Columbia. In brief, Grand Jury proceedings are presumptively secret because of due process, reputational, and privacy concerns. See Federal Rule of Criminal Procedure, Rule 6. Grand Jury proceedings are distinct from criminal trials. In addition, there is no First Amendment right of access to grand jury proceedings. Further, federal prosecutors are entrusted with broad authority to compel production of information and formally accuse an individual of criminal wrongdoing. There are risks of misapplication –intentional or inadvertent –of this powerful authority. Court found these concerns outweighed the public interest.</p>
J.M.	<p>NUMERICAL CORRECTION TO PRIOR COMMENT</p> <p>Both proposed and prior sampling methodology to determine soil radiation-hazard level throughout the RM Greenway Project area appear to be totally inadequate. Recreational use of the area should be prohibited until acceptable radiation-hazard levels are established.</p> <p>Figure 2-2 of the proposed Sampling and Analysis Plan shows a large part of the recreation area over which measurement points exhibit contamination levels of Plutonium 239/240 that can be as high as 9.8 pCi/gm. These contamination levels throughout the area are ~ 8.9 times higher than the 1.1 pCi/gm average levels cited on page 17 of the CDPHE Publication, "Rocky Mountain Flats :Myths and Misunderstandings."</p> <p>Furthermore, "Colorado's permissive standard for plutonium in soil: In Democracy, Environment, Jefferson Parkway, Nuclear Guardianship, Plutonium, Public Health, Rocky Flats on June 23, 2013," states "Carl Johnson, Director of the Jefferson County Health Department, . . .and two U.S. Geological Survey colleagues employed the innovative method of sampling only respirable dust. Dust samples taken at 25 locations showed plutonium concentrations on average 44 times greater than what had been measured at the same locations by the state using whole-soil samples. Several readings exceeded previous ones by 100 times or more, one by 285 times."</p> <p>Because the sampling measurements appear to correspond to deeper sub-soil sample depth, the contamination levels for respiratory dust throughout the area can be as much as ~ 8.9 x (44-100 or more) = 390-890 or more times higher than the average levels of 0.5 mrem cited in the CDPHE Publication. These potential human dosage levels are ~8-18 or more times higher than the State specified individual-exposure threshold of 25 mrem.</p> <p>I request, therefore, that no further recreational use of the RM Greenway be permitted until acceptable surface-dust contamination levels are established throughout the area.</p>	<p>This study is not intended to be a replacement for the RFNWR risk assessment study. The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.</p>
J.W.	<p>It is inappropriate and unsafe to encourage people to walk around in Rocky Flats and I strongly disapprove of trails being put on that land. I will not use, or allow my family to use, the open space around Rocky Flats. This is a waste of taxpayer money and gives outsiders a bad image of Colorado.</p>	<p>The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.</p>
J.H.	<p>It is inappropriate and unsafe to put trails in Rocky Flats, I will not use that area and i tell everyone I know and meet everyday the same. it is a waste of taxpayer money, and it gives Colorado a bad reputation with outsiders who see us as willing to put people at risk in an unsafe area.</p>	<p>The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.</p>
C.G.	<p>I find it extremely interesting that in 2016 the Cook vs Rockwell case was settled. Plaintiffs who lived in the area of Rocky Flats and Arvada were awarded \$375 million because their land was contaminated by plutonium. Now 2 years later our government and Arvada are stating it is safe to open the Rocky Mountain Greenway. This is hypocrisy in the extreme. If it is truly safe then there should be no worries about unbiased and independent testing. The government created the contamination but we are suppose to trust the same government now that it is totally safe. This same government gets to decide what is safe levels of plutonium.</p>	

There are several major problems with the sampling plan for the Rocky Mountain Greenway Trail. I am strongly opposed to the construction of this trail. In the best interest of public health, the Rocky Flats National Wildlife Refuge must not be open for public recreation.

1. The project is proposed to traverse ground that is known to be contaminated.
2. The project is an unnecessary risk to public health and safety.
3. There are significant concerns in the regional community that cannot be ignored.

1. Refer to figure 3.16 of plutonium in surface soil. It is clear that the majority of the RFNWR has levels of plutonium above background level. This is absolutely unacceptable for a recreational area for families. There is already sufficient data for people to determine this land should not be opened to the public.

The sampling plan is inadequate to assure public health and safety. The sampling plan is limited to only sample the trail crossings at Indiana St. and Highway 128. The land within the Rocky Flats National Wildlife Refuge was not remediated during the Superfund cleanup. Figure 2-3 cited from Kaiser Hill's RCRA Facility Investigation in 2006 shows a maximum value of 49 pCi/g of Pu 239/240. Hot spots such as the 49 pCi/g sample should not be ignored by averaging them together with other samples. Hot spots of contamination can change with the weather, high winds and erosion. This sampling plan does not account for the myriad of contaminants at Rocky Flats in addition to plutonium, uranium, and americium, such as beryllium, radioactive lead, vinyl chloride, etc.

C.A. An active Superfund site, the Central Operable Unit, remains at the center of the RFNWR. The Superfund cleanup set standards for plutonium that the top 3 feet of soil must be cleaned to 50 pCi/g, 3-6 feet must be cleaned to 1,000 - 3,000 pCi/g, and below 6 feet has no limit. As a society, we must be cautious of how this buried contamination will be affected by wind and erosion over time.

2. CDPHE and EPA acknowledge that the most dangerous pathway for exposure to plutonium, a radionuclide that emits alpha radiation, is through inhalation of respirable dust. Although CDPHE and EPA have claimed that the risk levels are sufficiently low to allow public recreation, many scientists and experts disagree. Colorado is a semi-arid climate and there is a clear risk of resuspension of contaminated dust by activities including mountain biking, horseback riding and hiking. There is a discrepancy with CDPHE and EPA's assessment of Rocky Flats. These agencies acknowledge that inhalation of alpha emitting radionuclides is dangerous to one's health, yet why don't they acknowledge the resuspension of dust from recreational activities and construction? The CDPHE and EPA risk assessments need to be re-evaluated to be more protective of present and future generations.

3. The community is speaking out against this project and our elected officials have a responsibility to act in the best interest of public health. It cannot be ignored that 7 school districts representing nearly 300,000 students in the region have made a commitment to not allow field trips to Rocky Flats National Wildlife Refuge. The Director of Jefferson County Public Health, Dr. Mark Johnson, has made public statements that caution against recreation at Rocky Flats. Thank you to the elected officials, elected school boards, and government officials that are standing up for public health.

It is the responsibility of our local, County, State and Federal government to take a stronger stance for public health, represent the people who have been impacted with health problems by the Rocky Flats Plant, and speak out against public recreation at Rocky Flats. This is an urgent matter of public health for Colorado as well as the United States. Rocky Flats is one of many nuclear weapons plants that are causing health problems for downwind communities. Thank you for your time to review this information and please make the best decision for public health by preventing construction of the Rocky Mountain Greenway and keeping Rocky Flats closed.

I am an environmental scientist and do not think that the sampling at the Rocky flats has been good. The current measurements do not assure safety of children, kids and pets. Both proposed and prior sampling methodology to determine soil radiation-hazard level throughout the RM Greenway Project area appear to be totally inadequate. Recreational use of the area should be prohibited until acceptable radiation-hazard levels are established.

Based on readings of a colleague, Figure 2-2 of the proposed Sampling and Analysis Plan shows a large part of the recreation area for which most measurement points exhibit contamination levels of Plutonium 239/240 that can be as high as 9.8 pCi/gm. These contamination levels throughout the area are 9 times higher than the 1.1 pCi/gm average levels cited in the CDPHE Publication, "Rocky Mountain Flats :Myths and Misunderstandings."

K.K. Furthermore, "Colorado's permissive standard for plutonium in soil: In Democracy, Environment, Jefferson Parkway, Nuclear Guardianship, Plutonium, Public Health, Rocky Flats on June 23, 2013," states "Carl Johnson, Director of the Jefferson County Health Department, . . .and two U.S. Geological Survey colleagues employed the innovative method of sampling only respirable dust. Dust samples taken at 25 locations showed plutonium concentrations on average 44 times greater than what had been measured at the same locations by the state using whole-soil samples. Several readings exceeded previous ones by 100 times or more, one by 285 times."

Because the sampling measurements appear to correspond to deeper sub-soil sample depth, the contamination levels for respiratory dust throughout the area can be as much as ~ 9.8 x (44-100 or more) = 430-1000 or more times higher than the average levels of 0.5 mrem cited in the CDPHE Publication. These potential human dosage levels are ~9-20 or more times higher than the State specified individual-exposure threshold of 25 mrem.

I request that no further recreational use of the RM Greenway be permitted until acceptable surface-dust contamination levels are established throughout the area.

Comment noted. This study is not intended to be a replacement for the RFNWR risk assessment study. This study relies upon the evaluations performed during the RCRA FI-RI/CMS-FS and published in the June 2006 Kaiser-Hill Report. Note that the PRGs for radionuclides were revised in 2017 as illustrated in SAP Table 8-1. EA will rely upon these updated PRGs to assess the data generated by this study.

S.Y. I would love to see open space, a nature center, a historical center, and trail spaces.

D.N. I am an avid Colorado hiker and park goer. I will never avail of the Rocky Flats project--and I am dumbfounded that the County persists in advancing this reckless and unsafe project. Let it go folks. It's not a welcome addition to the park inventory; it just gives you a bad name for even supporting it.

The FLAP partner group is committed to public safety and if the results of the sampling plan reveal levels outside of legal and regulatory thresholds, the group will not recommend this project proceed. The effort being undertaken by the FLAP partner group is independent of the opening of the Refuge and the construction of trails within. The FLAP partner group has no influence on the planned opening of the site or of the development of trails and other facilities.