



**Rocky Flats Citizens Advisory Board  
Recommendation 2004-3**

**Comments on the Draft Comprehensive Conservation Plan/  
Environmental Impact Statement  
for the Rocky Flats National Wildlife Refuge**

**Approved April 1, 2004**

Letter to:

Ms. Laurie Shannon  
Planning Team Leader  
U.S. Fish and Wildlife Service  
Rocky Mountain Arsenal Building 121  
Commerce City, CO 80022

Dear Ms. Shannon:

The Rocky Flats Citizens Advisory Board (RFCAB) is pleased to submit the following comments related to the draft Comprehensive Conservation Plan / Environmental Impact Statement (CCP/EIS) for the Rocky Flats National Wildlife Refuge.

As you know, RFCAB is a federal advisory committee chartered to provide advice and recommendations to the Department of Energy, the regulators and others on matters related to the cleanup and closure of the Rocky Flats site. Our membership represents a diverse cross-section of the community. The Board develops its recommendations by consensus, which when considering the diversity of our membership represents a careful balance of the views and opinions shared by our members.

In considering the information presented in the draft CCP/EIS, the Board does not have consensus on whether one of the proposed alternatives, A, B, C, or D, should be chosen for future management of the refuge. Further, nothing in this letter should be construed to imply that the Board has reached consensus on whether there should be public access to the refuge. We do have agreement, however, on certain aspects of the overall management plan irrespective of whatever management alternative is ultimately selected and offer them as follows.

- 1) No dogs should be allowed on the refuge.
- 2) In the event that an alternative is chosen that allows public access, there should be no motorized vehicles allowed except in public parking areas or for site maintenance.
- 3) The Board supports the overall goal of ecological restoration at the site, particularly the protection and development of the tall-grass prairie ecosystem.
- 4) In order to prevent access to the DOE-retained portions of the site, there should be a permanent and clearly demarcated boundary. The U.S. Fish and Wildlife Service should be an active decision-maker in the establishment of this boundary. Members of the community should also be involved in the decision.
- 5) It is important to preserve the history of ranching as part of the story of the Rocky Flats land, but preservation of the actual remaining ranching structures is not a top priority for the Board.

**ADMIN RECORD**

- 6) Because of its close association with the tall-grass prairie ecosystem, mining is not a compatible land use for the refuge. The Board supports the U.S. Fish and Wildlife position that no land be transferred into the refuge until the mineral rights have been acquired or after such time that mined lands have been reclaimed. The responsibility for resolving the outstanding issues related to the mineral rights remains with the Department of Energy.
- 7) While not in agreement on the final location, the Board supports the development of a combined refuge interpretive center and museum related to Rocky Flats history.
- 8) The Board supports a strong environmental education program focusing on the ecological resources at the refuge, but is not in agreement on whether these programs should include access to the site.

The Board is also forwarding to you the results of a survey on the refuge management alternatives and related issues completed by our members. These survey results do not represent any official position of the Board, but do provide an insight into the development of our comments outlined above.

We thank you for the opportunity to provide our comments.

Sincerely,

Victor Holm  
Chair

cc: Frazer Lockhart, DOE-RFPO  
Steve Gunderson, CDPHE  
Mark Aguilar, EPA

**Rocky Flats Citizens Advisory Board**

**Summary of Responses to the Board Survey  
on Alternatives for the Draft Comprehensive Conservation Plan/  
Environmental Impact Statement  
for the Rocky Flats National Wildlife Refuge**

March 22, 2004

Note: A total of 13 respondents completed the survey.

**Part I: Alternative Preferences**

**SUMMARY TABLE OF PREFERRED ALTERNATIVES**

	Alternative A	Alternative B	Alternative C	Alternative D
1 <sup>st</sup> Choice	2	5 <sup>a</sup>	4	2
2 <sup>nd</sup> Choice	1	1 <sup>b</sup>	2	

\*a: 2 of the supporters for this alternative would seek to modify it; one would like to see expanded education and a Visitor's Center, while the other would like to see expanded education and no hunting allowed.

\*b: As a second choice for this respondent, the decision on whether to allow access would be made only after a 3 – 5 year period.

**Comments:**

- *I prefer C as the most pure reflection of the purposes of refuges and of the goals of this one specifically.*
- *1st choice is C; would support B only if a decision to allow access is delayed for 3 – 5 years to determine if it is safe.*
- *B, but with some additions from D to include expanded education and a Visitor's Center*
- *Alternative B*
- *D would be my choice since it includes provisions for the most public access and environmental education.*
- *D*
- *Alternative B: it provides a good mix on the land use.*
- *Alternative B, but modified to include expanded education to K-8 and no hunting allowed.*
- *I would like to see the site closed to public access for some hundred years. During this time I think the site should be managed with wildlife and habitat preservation the first priority. As a second priority, I believe that the site should be used for research into better remediation technologies and biological effects of contaminants on flora and fauna. I think the best alternative provided by USFWS is option C. While I would prefer a No Access alternative, Alt C comes closest while still focusing on environmental restoration and wildlife management. My second choice would be alternative A. Alternatives B & D are out of the questions as far as I am concerned.*
- *I support alternative A or possibly C.*
- *I prefer Alternative A; although I could possibly live with Alternative C.*

**Views on the four alternatives:**

Alternative A Positives	Alternative A Negatives

<ul style="list-style-type: none"> <li>• <i>It brings back the land and does not have people tracking over potentially contaminated land.</i></li> <li>• <i>Nothing</i></li> <li>• <i>Nothing</i></li> <li>• <i>Nothing</i></li> <li>• <i>It does make it a wildlife refuge in the sense that the land will be undisturbed and keeps people from contamination.</i></li> <li>• <i>I do not like this alternative</i></li> <li>• <i>Most "natural"</i></li> <li>• <i>There is little public access allowed</i></li> <li>• <i>The fact that it allows time to determine the extent of contamination before the public is allowed onto the site.</i></li> <li>• <i>Very little.</i></li> <li>• <i>This alternative would be the least detrimental to the site and to the community. It would allow more time to evaluate the residual contamination.</i></li> <li>• <i>Limited cost</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Invasives, lack of restoration</i></li> <li>• <i>Doing little or nothing is never the correct path for taking care of the land.</i></li> <li>• <i>I don't understand who takes care of the rest of the property in this manner. It makes no sense to have all this property set aside to essentially become wasteland. Having no plan for the land and eminent pressing need for land will cause the land to become developed and that is not what I think we want.</i></li> <li>• <i>In my opinion it does not comply with the spirit of the law. I understand it must be included in order to have a point of comparison but that is its only use.</i></li> <li>• <i>There is no provision for general public access or for active management of the land.</i></li> <li>• <i>No public use of land.</i></li> <li>• <i>It keeps RF as a fenced isolated piece of property and does not permit the public to enjoy it.</i></li> <li>• <i>Ecological restoration is limited to the Rock Creek Preserve; fire is an option for weed control; research is not emphasized; education about the site is not included.</i></li> <li>• <i>Nothing</i></li> <li>• <i>It doesn't do enough in the way of restoration and stewardship for natural values the refuge supports</i></li> <li>• <i>Nothing</i></li> <li>• <i>No public usage; mineral rights issue</i></li> </ul>
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**Alternative B Positives**

**Alternative B Negatives**

<ul style="list-style-type: none"> <li>• <i>It does provide a good mix.</i></li> <li>• <i>Best compromise for everyone concerned so far.</i></li> <li>• <i>Public access is available.</i></li> <li>• <i>Right mix of trails and public use.</i></li> <li>• <i>I think that this is the most reasonable plan of use for a wildlife refuge.</i></li> <li>• <i>It is better than Alternative D and provides some level of restoration of the land.</i></li> <li>• <i>Most palatable – an intelligent attempt to balance society's selfish demands and the intent of the refuge.</i></li> <li>• <i>Nothing</i></li> <li>• <i>There is some ecological restoration planned.</i></li> <li>• <i>The increased emphasis on restoration and natural values of the site paired with some public recreation seems to be a decent compromise.</i></li> <li>• <i>Nothing!</i></li> <li>• <i>Best balance between public use and restoration.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Too much use is contrary to the purposes/ goals</i></li> <li>• <i>I have concerns about the extent of public access</i></li> <li>• <i>I do worry about if 16 miles of trails is too much access and would inhibit restoration efforts, i.e., people would flock there in the summer and it would look like it was "crawling with ants." Also concerned that this might interfere with institutional controls and potential exposure to contamination if over visited.</i></li> <li>• <i>I would like to see more education, as in D.</i></li> <li>• <i>Trails should somehow be linked so one does not always have to backtrack to "return to go." I'm not a fan of hunting, but will accept it in strictly limited and controlled situations.</i></li> <li>• <i>Limits on public use of lands.</i></li> <li>• <i>People potentially (low probability still means there is "some") could be contaminated.</i></li> <li>• <i>It is unsafe.</i></li> <li>• <i>(*1)Public access is allowed; biking and horseback riding are allowed; children are encouraged thru schools to visit; hunting is allowed...whatever happened to providing refuge at a refuge?...too close to communities and roads...also not enough is known about the bioaccumulation of radionuclides or other toxins (actual or possible); fires would be used as a management tool.</i></li> <li>• <i>The potential for increased human disturbances from planned recreational uses. Less funding than option C for ecological conservation and restoration</i></li> <li>• <i>Everything!</i></li> </ul>
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	<ul style="list-style-type: none"> <li>• Mineral rights issues</li> </ul>
<b>Alternative C Positives</b>	<b>Alternative C Negatives</b>
<ul style="list-style-type: none"> <li>• The restoration</li> <li>• From a wildlife point of view this is a good alternative.</li> <li>• Very little, since my understanding, limited though it is, is that DOE is supposed to do the restoration of most of the disturbed areas.</li> <li>• I like little about this alternative</li> <li>• Restoration of the land would be easier here than in B.</li> <li>• Taking care of the land is the most important goal for the site. Restoration should be accomplished first.</li> <li>• Most consistent with the purposes/goals.</li> <li>• Limited public access</li> <li>• Access by the general public is limited; ecological restoration and habitat preservation are of highest priority.</li> <li>• The strong emphasis on ecological conservation and restoration is its strong point. I would love to see much of the stewardship work proposed by this alternative (such as increased amounts of weed control and increased restoration work) applied to alternative B.</li> <li>• Public access is limited</li> <li>• Returns to what area was like before settlement.</li> </ul>	<ul style="list-style-type: none"> <li>• Cost?</li> <li>• Again the cons are that of A. We would be creating a land museum here and I think eventually the land would fall to pressure of development.</li> <li>• I believe wildlife refuges should be open for public use to the extent that the wildlife is not threatened. The wildlife at Rocky Flats is used to human contact and will not be harmed by public use.</li> <li>• The lack of public access.</li> <li>• Limits public use of land.</li> <li>• It keeps RF as a fenced isolated piece of property and does not permit the public to enjoy it.</li> <li>• Still includes opening up the site without determining the full extent of the contamination.</li> <li>• The single trail will still have to be maintained; it does allow some public access.</li> <li>• Could generate public pressure for increased public access and create negative connotations with ecological restoration and conservation work (locking out the users, etc.).</li> <li>• Allowing public access while not knowing the full extent of residual contamination.</li> <li>• Limited public use; mineral rights issue</li> </ul>
<b>Alternative D Positives</b>	<b>Alternative D Negatives</b>

<ul style="list-style-type: none"> <li>• <i>Increased public use of land.</i></li> <li>• <i>Best for full, public use of land.</i></li> <li>• <i>The environmental education program would encourage significant use by the public, as would the Visitor Center and the trail system.</i></li> <li>• <i>The broad public use and education options.</i></li> <li>• <i>The education program and the visitor's center if the visitor's center included the cold war museum since that is a major part of the history of the land and a significant part of maintaining the institutional controls. Could we include this in B?</i></li> <li>• <i>I do not like this plan.</i></li> <li>• <i>None</i></li> <li>• <i>Nothing</i></li> <li>• <i>Nothing</i></li> <li>• <i>Public accessibility could theoretically increase public awareness and support for the refuge.</i></li> <li>• <i>Nothing! Nothing! Nothing!</i></li> <li>• <i>Max public usage</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Too much use and contrary to legislated purposes and goals.</i></li> <li>• <i>Too much public access. This would be giving into the cities and their desire to make RF a park. Also too little emphasis on restoration.</i></li> <li>• <i>The same concern of being over "peopled" as I have with B. What is the right amount of trails versus the acreage?</i></li> <li>• <i>It might be too costly.</i></li> <li>• <i>It seems to me that saying that local communities should provide linking trails is something of a cop-out. The FWS should develop and maintain linked trails within the Refuge and should do as much as possible to encourage public use.</i></li> <li>• <i>Nothing</i></li> <li>• <i>Increased use of this public land will increase potential of someone getting contaminated.</i></li> <li>• <i>Everything – a refuge is not a public recreation area</i></li> <li>• <i>Everything (see *1 above under Alternative B negatives, except the fire clause)</i></li> <li>• <i>Too large of an emphasis on recreation for a wildlife refuge. Not enough emphasis on restoring and maintaining the natural values of the site. Too much potential for increased human disturbance related to heavy recreational use. This alternative would likely damage the very values the refuge was established to protect.</i></li> <li>• <i>Everything! Everything! Everything!</i></li> <li>• <i>Most expensive; mineral rights issue</i></li> </ul>
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**Part II: Summary of Comments on Specific Issues**

The following is a list of topics considered in the survey and individual responses from board members and members of the Wildlife Refuge Group.

1. Hunting (limited hunting would be allowed under Alternative B):

- *I agree with the proposal as presented.*
- *If this is necessary for wildlife herd management, I would support it. If the deer and elk herds become difficult to control, then I would support some expanded hunting but only with strict controls.*
- *This is fine if well managed. With lack of predators (and I don't see any wolves being introduced here) the deer population will go relatively unchecked.*
- *Hunting should take place but only if biologically necessary.*
- *A necessary and valuable management tool.*
- *I do not agree with public hunting in any of the alternatives. If deer or elk herds need to be culled, it should be done by professionals who can best select the animals to be culled and use proper weapons to make clean kills. There are many other opportunities for hunting throughout Colorado, including along the Front Range.*
- *No strong opinion but would prefer that deer be controlled by predators.*
- *I do not believe that hunting in any form should be allowed at this site.*
- *This type of hunting results in a great deal of pain to the animals. The idea of hunting at an urban site surrounded by busy roads and residential development is unacceptable.*
- *I believe only youth and the disabled should be allowed to take part in what will be essentially canned hunts. It seems from comments made at our last meeting that hunting could ultimately be open to all hunters, and given the nature of the refuge, I'm not sure that use would be appropriate.*
- *Unacceptable! I do not agree with the use of firearms for killing helpless creatures; therefore, must be counted as a conscientious objector. There must be more humane ways to control the animal populations.*
- *The purpose is to control wildlife population. Even with low-impact weapons, there is still danger.*

2. Dogs. (No dogs under all alternatives)

- *I agree with the proposal as presented.*
- *Absolutely (no dogs). I have had big dogs and, yes, they need to run. If they are under voice control, all should be well. Unfortunately, I have had many experiences in open space that allows this and have had to protect my children and break up dog attacks against my dogs. People don't understand what their part in voice control means. National parks don't allow it (so as) to protect the visitors and wildlife for good reasons. We should not allow it.*
- *I am in favor of this. People are stupid and do not read signs. I see dogs off-leash everywhere.*

- *This is an excellent policy.*
- *Dogs are blatantly contrary to purposes and goals.*
- *I agree.*
- *Great! No dogs, no horses. No people!*
- *Agree.*
- *Dogs disturb wildlife, and many owners are irresponsible in natural areas and refuse to keep their dogs on a leash. No objections to this at all, even though I am a dog lover.*
- *I agree! Stray dogs are another issue.*
- *Dogs are not allowed in many national parks and refuges.*

3. Environmental education for high school and college only

- *I agree with the proposal as presented.*
- *I disagree. Even cub scouts could benefit from education of the site. It just needs to be well managed. Actually, I would be more afraid of danger from high schooler "testosterone" activities on a school field trip than boy scouts.*
- *We will have to see what the demand is.*
- *Everyone needs and benefits from a solid environmental education program. It should not be targeted only toward high school and college students.*
- *Most suitable. As a science teacher, I agree that the site is not practical for K-6 classes, but is of value to the limited impact nature of 9-12+ learning.*
- *An environmental education program for K-8 should be included in Alternative B, as well as Alternative D. It is very important to start environmental awareness at as early an age as possible. Most K-8 students are interested in the environment and are able to understand many of the ecological aspects of a wildlife refuge.*
- *Strongly agree.*
- *If they are still encouraging field trips from other grades, why not also have some sort of curriculum or short lessons developed for those (other) ages, too. I do not support any educational programs that require field trips to the site, though.*
- *Students should not be allowed on the site. It is not a pristine site.*
- *I would like to see it extended to K-8, as well. Fort Collins public schools district has a program for younger students (Eco-week) that is hugely successful. Environmental education efforts for RF could be patterned after this and similar programs as the budget for RFNWR allows.*

- *No students!*

4. Public Participation Partnership.

- *I do not understand the need and do not support.*
- *Do not understand the question and goal here.*
- *Volunteerism is my middle name. I have done volunteer work for 20 years both on private and government lands.*
- *There may be private groups, such as the Sierra Club or other organizations and/or state agencies with which the FWS could partner to provide the most effective environmental education possible. FWS should make every effort to bring the public, especially those living near Rocky Flats, into every planning process as early and as often as possible.*
- *Whatever supports the purposes, not use.*
- *Strongly agree.*
- *I think that research partnerships could be very productive. They also have the potential to bring some higher paying jobs to the area, depending on the size and scope of the research project(s).*
- *Independent researchers would be appropriate to help characterize the site.*
- *Public participation is a great way to both increase support for the refuge and to educate the public about its existence and value. I would love to see more things like our native seed collection program and the up-coming Bio-Blitz.*
- *It would be acceptable to authorize independent research on a limited basis.*

5. Access fees (no access fee will be charged)

- *I agree with the proposal as presented.*
- *This is a decision for the Fish and Wildlife Service. Few lands these days do not have an access fee due to the cost of maintenance. I would not support this as written.*
- *This is up to the Service to decide.*
- *None should be charged since these are our tax dollars at work. It makes little sense to me to pay twice. The only fee I could support, and I'm not sure I would, is something like the National Park Service's Golden eagle program, where the income goes to the maintenance of the park system.*
- *Fees require too much management and increases/encourages use through implication.*
- *I do not oppose use fees.*

- *If people are allowed on the site, we certainly shouldn't ask them to pay to be exposed to the site and its dangers.*
- *Agree.*
- *I'm fine with this, but am reticent that with falling budgets a fee may be needed to maintain the refuge at some future time.*
- *Disagree – if they had to pay, it might discourage usage, which is what I would prefer.*

6. Parking areas and vehicle access (Three parking lots are planned under B)

- *Why three (parking lots). One is okay. – Keep motor bikes off. Keep four-wheel vehicles off.*
- *Do we need this many (parking lots). How large would they be? Where would they be? These questions would need to be answered before I can form an opinion. – Well, if we have a parking lot, then I guess we need vehicle access. But I would strongly encourage access only from surrounding arteries and not a road through the refuge. The refuge is too small. -- Keep all motorized vehicles off except those needed by the Fish and Wildlife Service. There is nothing more damaging to the land than this.*
- *Only if usage volume makes it necessary.*
- *Any parking areas should allow for easy public access to the refuge's Visitor Center and trails. (On vehicle access) This makes sense unless the parking areas are on the perimeter as is the parking lot at Two Ponds.*
- *(Parking lots) on perimeter only to minimize negative impacts.*
- *Parking is important but it should be on the boundary. Perhaps they could be built on the open space. No (vehicle access).*
- *This is excessive.*
- *Vehicle use should be kept to a minimum in order to highlight the undisturbed qualities of the site to visitors. The smallest number of parking facilities practical for projected use of the refuge should be built with care to ensure appropriate access is provided for the disabled to enjoy the refuge.*
- *None! (no parking lots).*
- *Only no vehicles, including motorcycles, quad runners would be allowed – i.e. no powered conveyance other than wheelchairs.*

7. Installation of Wildlife Tunnels/Corridors to allow wildlife on and off refuge.

- *Do not consider this a wildlife problem – local government should address this along with other street upgrades.*
- *If this becomes a problem, then the county will need to address it at that time, i.e., if Indiana becomes a highway, then plans need to be made so that deer are not lying dead in the road – for the safety of the driver and the deer.*

- *This would have to be forced on any planning for roads.*
- *Somehow, animals cross now and jump the stock fence. I'm not sure tunnels would make much difference.*
- *Yes (to wildlife tunnels).*
- *(Should be) Part of the upgrade of Indiana Street.*
- *Wildlife corridors/tunnels are only effective when they are large enough for multiple animals to cross at once. They are often built too small so that animals wind up feeling trapped rather than safe. In theory, it is a good idea, but I'm not sure it would be appropriate at Rocky Flats.*
- *I would like to see some of these on the west and east sides of the refuge, but realize the funding for them may not be there. Perhaps they can become part of a future transportation project in the vicinity.*
- *Tunnels would also give humans access. They are only a good idea if humans could be restrained from access. I can just picture a bunch of dirt bikers, ATVers, or snowmobilers finding the entrance and going for a joy ride.*
- *Especially (under) Northwest Parkway (Indiana).*

#### 8. Preservation of Lindsay Ranch

- *The need for either barn and/or house should be documented (both plus and minuses). Currently I do not see the need to keep either.*
- *This is a concern for the historical society. How important is Lindsay Ranch to the history of the land? I think that I could not support saving Lindsay Ranch if we do not also have the cold war museum attached, as well. We must not try to block out what happened here by only promoting the ranch and the prairie land.*
- *How do you keep people out of the structures? Are they safe?*
- *Unless there is a significant interpretation effort, why not just tear down all the Lindsay Ranch buildings?*
- *Rip all buildings down – lower cost, lower encouragement of use, more supportive of purposes and goals of the refuge. Why sink resources into any preservation or maintenance when those resources can have a much more valuable impact elsewhere? By removing the structures, the condition of which makes them of minimal value, the habitat and visual aspects are both enhanced.*
- *No strong opinion.*
- *I think stabilizing either is a waste of time and money.*
- *It is not a historical building.*
- *Historical preservation is an important goal, but if the house cannot be saved for a reasonable amount of money, only stabilizing the barn seems a reasonable compromise.*

- *Is the barn not completed?*
- *Why not both?*

9. Burning and grazing would be used as environmental management tools (under Alternative B).

- *I agree – in the wildlife area (buffer zone). How will the rest of the site manage weeds?*
- *Weeds will need to be controlled to maintain prairie. This has been an ongoing process at other places, including Fermi Lab in Illinois, for the preservation of prairie grass. The problem will be the control of the burn as to not encourage soil erosion. How much uptake of Pu, etc., is there in plants? That needs to be documented to decide where it is safe to burn.*
- *These are necessary tools for restoration and weed management. The issue of contamination would need to be studied.*
- *This is not an issue for me since burning generally is an effective way to restore the prairie. Common sense, however, would argue that it should not be done on a windy day.*
- *Burning is a valuable management tool. Grazing I'm not sure of – skeptical. Why isn't the retained area included? This seems to hinder the effectiveness of vegetation management, while not posing a possible contamination concern.*
- *I have no concerns about contamination reaching the community.*
- *I share the above concerns (that burning would send surface contamination aloft and that cattle would consume and retain large amounts of contamination), and would not approve of fires or grazing as tools utilized at the site. The only exception might be if the grazing animals were owned and cared for by USFWS. AND these animals were humanely studied for information on body burdens, bioaccumulation, uptake by plants and other pertinent health-related questions.*
- *These are proper concerns (that burning would cause airborne contamination and cattle would retain contamination). There are better ways to address this problem.*
- *I believe prescribed fire will be essential to maintaining the tall grass prairie and other natural values of the site. Information I have seen on the contamination issue seems to paint contamination as a not very valid concern in terms of prescribed burns. Cattle used appropriately can simulate natural herbivores that would graze grasses on the site. But cattle can also be a source of introduced noxious weeds, cause erosion, selectively graze the most desirable vegetation, and do damage to riparian areas. Any use of cattle should be very carefully managed and monitored for deleterious effects and slaughtered cattle could be tested to verify any potential contamination.*
- *I agree with the concerns. What are the alternatives?*

10. Equestrian use.

- *I agree with bikes, only when used as a mode of transportation. I do not agree with horses – I have never seen a location where they really do pick up droppings and the area would be kind of small for horses.*
- *I have some big problems with this item – I have the feeling that FWS is using the weed seed/manure problem as a “smoke screen” to limit horse use*

*on their wildlife refuge. If they plan to use grazing on the refuge without manure cleanup, then they sure can allow horses on the trails. The manure will help provide better footing on the trails and will be broken up and worked into the soil by the animals using the trails.*

- *I question horses. I do not agree with bikes and hiking traffic, as there do not seem to mix well in my experience. Perhaps we need to have some designated trails for all. Biking would be good for those who want to cross the refuge over a long distance. (I would use this) Maybe a trail like that connected to other open space trails is good, but we also need trails for bird watchers, educational tours, etc., which do not have to fear getting run over by a bonsai mountain bike coming downhill.*
- *I feel the service is caving in to local pressure on this. I don't think it is a good idea.*
- *There are some trails in Boulder County that are used by bikes and horses, which makes the trails difficult for hikers to use. As long as there are some pedestrian-only trails in the Refuge, it would be fine with me to allow bikes and horses on some trails, especially if horse owners would cleanup after the animals.*
- *Separate bikes and horses, but weed seeds are a concern and cleanup is idealistic or impractical.*
- *I would hope volunteer help both from horse users and bikers would mitigate the damage.*
- *I don't think horses are appropriate for the site. I think even diapered horses could do damage through erosion.*
- *Horses do distribute invasive weed seeds. Where will the drinking water for the horses come from?*
- *No horses! No vehicles of any kind, including bicycles.*

11. Need for ecological restoration as opposed to mere revegetation.

- *Within reason of purpose and expense, this would be great. We have few native vegetation areas left and they are good for the wildlife that we are promoting.*
- *What is the appropriate climax habitat for the refuge? You will never get back to the previous condition but you can get close.*
- *Tearing down the nuclear weapons plant at Rocky Flats is costing an enormous sum. There is no reason we can't commit at least a fraction of that total toward an effective environmental restoration program.*
- *Some is practical and desirable.*
- *I agree.*
- *Restoration should be more important than recreation or access. We should be looking to protect the native flora and fauna, as well as replacing what was damaged so long ago.*
- *Waste of money.*
- *Restoration should be the goal, not revegetation. The refuge was primarily created for its ecological values, which should be maintained and restored.*

- *Is that economically feasible or even possible?*

12. Should motorbikes be allowed?

- *No.*
- *No.*
- *Absolutely no motorized vehicles, as they are very damaging to the land.*
- *No, no, no.*
- *NO!!!!*
- *No.*
- *NO!!!*
- *No.*
- *No.*
- *No!*
- *No!!*

13. Mineral Rights.

- *I believe land should NOT be transferred until mineral rights are obtained. We need the MOU.*
- *Those who created the wildlife refuge need to solve the mineral rights problem ASAP and stop dumping their responsibility on others. This was poor foresight on their part. This is not DOE's problem but has become Fish and Wildlife's problem unfairly. We need to push this or some type of legislation. Delaying transfer may not be in our best interest.*
- *This is Colorado. I can't understand why those who purchased the land for the government didn't buy the mineral rights at the time of purchase. If they didn't understand that mineral rights were not part of the deal, why were they allowed to participate in its making? As things stand now, though, there doesn't seem to be much the FWS can do short of buying the mineral rights and shutting down all mining operations, which is unlikely when the proposed annual federal budget deficit exceeds \$500 billion.*
- *Mineral rights are important and need to be rectified. I support the FWS stance.*
- *Every effort should be made by the community to reduce the value of these rights through strict compliance to permits and safety and then they should*

be purchased.

- *I support compensation for estimated value of mineral rights. I would support government ownership of these rights WITH a promise/LAW not to develop or extract any of the minerals. I do not support of the excavation of any new pits/sites within the RF area.*
- *We should not discuss the Refuge until the above responsibilities for the respective agencies are decided in the MOU.*
- *It seems this issue is falling off the radar screen which is really too bad. Both alternatives for obtaining mineral rights seemed to be good ideas, but neither has been that well received. I feel a large portion of the remaining undisturbed tall grass could be in danger from gravel mining. We have discussed this issue at length in our group, and those conversations should help to explain why the mineral rights issues loom so large over the refuge planning process.*
- *A way must be found to maintain the mineral rights with the refuge. The government needs to be responsible to find the money to protect its citizens. No transfer without mineral rights.*

14. Should there be a fence around the DOE-retained area?

- *If there is no fence, then I need to understand how the areas will be marked and controlled.*
- *Don't see any need for fences. Small signs should work well.*
- *Need to have institutional controls that make sense and protect. If a fence is needed to be effective, so be it. If we do not have a fence, then we need another good plan. Sorry, this is not pristine land so let's not pretend it is and fences will also remind people of what went on here. Let's not gloss it over, folks.*
- *Fences won't keep out most animals or determined people. I'm not sure a fence would be a wise use of resources.*
- *(A fence is a) big negative impact on wildlife and an unnecessary waste of money.*
- *No fence.*
- *I think a large and easily secured fence SHOULD enclose all of the DOE retained land. It is a shame that wildlife travel might be disturbed, but I believe that is of far less importance than protecting the public and preventing their access into this area of the site. If wildlife travel is considered to be GREATLY hindered by a large fence, a smaller fence could be acceptable as long as there are Warning AND Do Not Enter signs posted at short intervals around the entire perimeter on the smaller fence.*
- *The idea of a "seamless" refuge is unacceptable, given the amount of subsurface contamination left in the Industrial Area and other parts of the site.*
- *I think the fence idea is on balance not a good plan. The fence would cost a huge amount of money to construct and potentially take money away from needed restoration work and other important projects.*
- *There needs to be some way to keep humans off the site. Signs alone won't keep the public out, too many people think signs or laws don't apply to them. Fences that the animals can navigate might be an option so long as they are adequately posted with no trespassing contamination warning signs. The contamination hazard signs may cause someone to think twice before trying to access the land.*

15. Other concerns

- *Document how to ensure wildlife will not spread contamination from one area to another.*
- *A written plan of action (should be developed) on how DOE land will be controlled, fenced, etc., as well as how mining activities will be controlled:*
- *Trail locations – have these plans been made to minimize impact on endangered species and habitat connectivity (wildlife corridors)? It appears otherwise, so it may be worth addressing this.*
- *I support FWS efforts to raise the public's awareness that contamination/cleanup concerns are "activities outside the scope" and thus will not be addressed by this organization.*
- *If the visitor center in Alternative D could be used to house the museum and that was the only way the museum would work, I would support that.*
- *The present draft EIS is inadequate and does not address the effect of allowing the public onto a contaminated site. A new EIS needs to look at the extent of the contamination and how the public will be protected.*
- *The state land board section adjacent to the refuge contains some of the best remaining tall grass in the vicinity and I would like to see a partnership forged with the refuge to increase the emphasis on managing for the natural values of the site. In an ideal world this land would ultimately be a part of the refuge, but achieving that goal appears to be largely impractical.*
- *I don't believe this plan has looked at the full extent of impact public use could have on both the site and the users.*

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The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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