TOP TEN REASONS for NO PUBLIC USE of the Rocky Flats Wildlife Refuge

1. **The whole Rocky Flats site is contaminated.**
   Fires, accidents, routine operations, and random dumping during production years scattered plutonium across the whole of the 6,500-acre site. Additional toxins released include volatile organic compounds, heavy metals, beryllium, and other radionuclides. Each of these presents distinct dangers. Health effects of materials in combination are poorly understood.

2. **Plutonium in the environment is a permanent danger.**
   Plutonium has a half-life of 24,400 years; it remains dangerously radioactive for a quarter-of-a-million years. Tiny particles taken into the body may result in cancer, harm to the immune system, or pollution of the human gene pool. Particles left in the soil can be transported by human or natural processes. Some of what is left on the site may move off the site.

3. **No one knows how contaminated the site is.**
   The site has never been examined to determine the full extent of contamination. The "cleanup" will be completed without knowing whether there are undetected hot spots of various contaminants. Workers recently uncovered a buried incinerator three stories tall.

4. **A cheap cleanup endangers lives.**
   DOE and Kaiser-Hill made a closed-door deal with Congress to close Rocky Flats by a set date for a fixed sum, then tailored the cleanup to fit these limits, rejecting appeals that they seek more funds to do a better job. Of the $7 billion being spent to close the site by December 2006, no more than $470 million (about 7%) will be applied to cleaning the environment.

5. **The best possible cleanup is not happening.**
   The public has said that the ultimate goal should be cleanup to average background level, with current efforts going as far as possible in this direction. This is not happening. Instead, significant quantities of plutonium and other toxins are being left in the environment.

6. **Cleanup to wildlife refuge standards endangers future generations.**
   Rocky Flats will cease being a wildlife refuge long before plutonium left in the environment ceases being dangerous. What happens after fences fall and memory fades?

7. **Local people reject the cleanup being done.**
   85.6% of the individuals and organizations that commented on the Rocky Flats Cleanup Agreement proposed in late 2002 and adopted in June 2003 rejected the plan as inadequate. Their comments are part of the public record.

8. **Risk-based cleanup is dead wrong.**
   For the "risk-based cleanup" being done at Rocky Flats, risk is calculated by the government agencies to protect average humans, not those who are most vulnerable. Average people don't get sick and die; those who do include the very young, the very old, and the infirm. Fish and Wildlife Service (FWS) expects children and the disabled to visit the Rocky Flats site.

9. **Genetic effects of plutonium on wildlife are poorly understood.**
   Genetic effects on a given species may be so subtle that they cannot be easily detected until generations later when harm is irreversible. Any hurt to wildlife at Rocky Flats will not be confined to the bounds of the site.

10. **A contaminated environment is a high price to pay for open space.**
    DOE and FWS envision a Rocky Flats site with no fences or warning signs. To protect people from contaminants in the environment they will rely on institutional and physical controls (e.g., rules about use, barriers). The National Academy of Sciences says such controls will fail. Everyone wants open space; no one needs contaminated open space.

FOUR RECOMMENDATIONS
from the Rocky Mountain Peace and Justice Center on Future Use of the Rocky Flats Wildlife Refuge

a. MORATORIUM ON PUBLIC USE

Due to the contaminated conditions of the Rocky Flats site, the wildlife refuge should be declared off limits to the public for at least two centuries from establishment of the refuge.

b. RESEARCH ON HEALTH EFFECTS

During the period of the moratorium, a comprehensive research program should be implemented to collect data on the plutonium body burden of wildlife on the site, on the basis of which extrapolations can be made to genetic effects on the wildlife and potential effects on humans at or near the site. A comprehensive program of this sort has never been done before; it can provide invaluable information not only for Rocky Flats but also for plutonium-contaminated sites elsewhere.

c. TECHNOLOGY DEVELOPMENT

U. S. Fish and Wildlife Service should work closely with the DOE's Legacy Management Office in implementing at Rocky Flats a program of ongoing research on promising technologies that can be applied at the site to reduce contamination with minimal ecological disturbance. Such a program could be carried out in conjunction with local universities and other research bodies.

d. CITIZEN OVERSIGHT

To oversee the foregoing, a broadly representative program of pubic oversight should be developed and implemented. The responsibility of the public overseers would be not simply to monitor and to guide what is being done but to keep the general public informed of conditions at the site, including results of research on both health and effects and on technology development.

How to Comment on the Rocky Flats National Wildlife Refuge Environmental Impact Statement."

On Thursday, February 19, 2004, the U.S. Fish and Wildlife Service published their Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/EIS) for the Rocky Flats National Wildlife Refuge (see at http://rockyflats.fws.gov). The public is invited to comment on what FWS proposes. The deadline for commenting is April 12, 2004. Comments may be made in person or in written form as follows:

To comment in person, attend one of the following hearings (comments are limited to 3 minutes per person)

- Wednesday, March 10, 6:30-8:30PM: College Hill Library, Front Range Community College, 3645 W. 112th Ave. (east of Sheridan), Westminster
- Thursday, March 11, 6:30-8:30PM: East Boulder Recreation Center, 5660 Sioux Dr., Boulder
- Wednesday, March 17, 6:30-8:30PM: Arvada Center, 6901 Wadsworth Blvd., Arvada
- Thursday, March 18, 6:30-8:30PM: Broomfield Recreation Center, 280 Lamar St., Broomfield

Written comments may be submitted by mail, email, or fax as follows:

- By mail: Rocky Flats NWR
  Comprehensive Conservation Plan
  Attn: Laurie Shannon
  Planning Team Leader
  U.S. Fish and Wildlife Service
  Rocky Mountain Arsenal NWR
  Building 121
  Commerce City, CO 80022
- By email: rockyflats@fws.gov>
- By fax: Rocky Flats NWR
  303-289-0579

For more information on the condition of the Rocky Flats site, see
http://www.rmpjc.org/2004/RockyFlatsWildlifeRefuge/
or contact Rocky Mountain Peace & Justice Center, 303-444-6981

The Rocky Mountain Arsenal precedent

For about 50 years highly lethal nerve gas was made and stored at the Rocky Mountain Arsenal northeast of Denver. The Arsenal site is now operated as a National Wildlife Refuge by U.S. Fish and Wildlife Service. School children routinely visit the site. In October-November 2000 and again in June 2001, several "bomblets" containing sarin nerve gas were quite unexpectedly found on the site. Though the area where the bomblets were found is not visited by the public, this discovery is a reminder both that the Arsenal site is contaminated and that no one really knows where contaminants may show up.

While Fish and Wildlife Service may not be responsible for what remains in the environment at the Arsenal, they are responsible for allowing public access.