

## Rocky Mountain Greenway Open House/Public Comments – Suggested Talking Points

Jeffco Open Space has opened public comment period for the proposed *Sampling and Analysis Plan* related to the Rocky Mountain Greenway Trail at Rocky Flats National Wildlife Refuge. Comments can be submitted in person at either of two open house sessions (see below) or on line ([www.jeffco.us/FormCenter/Open-Space-15/Rocky-Mountain-Greenway-Comments-197](http://www.jeffco.us/FormCenter/Open-Space-15/Rocky-Mountain-Greenway-Comments-197)). Public comment closes August 24, 2018.

**Open House #1:** July 17, 2018, Westview Recreation Center, 5:30 p.m. to 7:30 p.m. (10747 W 108th Ave, Westminster, CO 80021)

**Open House #2:** July 24, 2018, East Boulder Recreation Center, 5:30 to 7:30 p.m. (5660 Sioux Dr, Boulder, CO 80303)

The document can be read at <https://www.jeffco.us/DocumentCenter/View/13802/Rocky-Mountain-Greenway---Sampling-Analysis-Plan?bidId=>

**Key Points:** Comments should address the soil sampling proposal as described in the proposal. The following issues have been identified:

- 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.
  - 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.
  - 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.
  - 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.
  - Samples should be analyzed at more than one laboratory, including one that is not an EPA lab.
- The contractor, Engineering Analytics (EA) is to perform the “requested diligence” including public engagement and outreach. Problems:
  - There is no language in the EA proposal that explains how public comment will be used to guide soil sampling and analysis.
  - Public comment is not included in the EA Project Schedule.
  - 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?
  - How will the findings from the analysis be shared with the public?
  - 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.
- As part of the on-line comment, respondents are asked to address a question about how important the RM Greenway and linkages to the open space and recreational opportunities at Rocky Flats National Wildlife Refuge (not yet open) are to the “long-term goals of my community”. The public is encouraged to address this in person, as well.