

# Chapter 5—Consultation, Coordination, and Responses to Comments



Cindy Souders / USFWS

*Rocky Mountain Arsenal National Wildlife Refuge staff*

*We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect.*

*Aldo Leopold, A Sand County Almanac*

This chapter includes information on agency and public consultation and coordination as required under NEPA. Consultation under other environmental laws (such as the ESA) is found in the appendixes to this final EIS.

## 5.1 Public Involvement

### Scoping Activities

A notice of intent to develop a CCP and a request for comments was published in the Federal Register on August 7, 2013 (78 FR 19052). The notice of intent notified the public of our intent to begin the CCP and

EIS process, of how the public could contact us and provide us with comments, and of the several public meetings we subsequently held in the refuge vicinity.

### Public Scoping Outreach

Early in the preplanning phase, we identified a process that would be inclusive of many interests, would involve a range of activities for keeping the public informed, and would ensure meaningful public input. To date, we have used various methods to solicit guidance and feedback from interested citizens, organizations, and government agencies. These methods have included outreach materials; public scoping meetings; agency meetings (planning team); briefings and presentations; and letters, email, and telephone calls.

### Planning Updates

A planning update was mailed in mid-June 2013 ahead of the four public meetings we held near the refuge. The planning update outlined the planning process; the dates, times, and locations of the public scoping meetings; and ways for the public to get

involved in the planning process and provide us with comments. We presented the information contained in the planning update during local agency meetings. The planning update distribution list consisted of individuals, agencies, and organizations who had previously expressed an interest in refuge activities.

---

## Press Release

Our Division of External Affairs sent a press release to all appropriate media organizations throughout Colorado, including congressional offices, other federal and state agency offices, and tribal agencies, announcing the planning process and notifying the public of the schedule and location of the public meetings. News articles about the refuge and the planning process appeared in local newspapers and online publications prior to the meetings.

---

## Project Web Site

The project's planning Web site was established in early May 2013. The site provides information about the public scoping meetings, as well as downloadable versions of all of the available public scoping documents, the notice of intent, the planning update, and the refuge's Comprehensive Management Plan. All interested individuals can sign up to be on the project mailing list or can provide public comment through the planning Web site.

---

## Public Scoping Meetings

The four public scoping meetings (July 25 to August 15, 2013) were a major component of the public scoping process. The purpose of these meetings was to inform the public about our planning process and about the refuge and its resources, and to solicit public concerns and planning ideas that will be considered in the CCP and EIS. The four meetings were held at the following locations:

- July 25, 2013: Public scoping meeting at the Reunion Recreation Center
- July 30, 2013: Public scoping meeting at the Central Park Recreation Center
- August 7, 2013: English and Spanish bilingual public scoping meetings at the Commerce City Recreation Center

- August 15, 2013: English and Spanish public scoping meetings at the Montbello Recreation Center

Following a brief welcome and introduction, Service staff made a 15-minute presentation that outlined the following topics: (1) a description of the Service and the purpose of the Refuge System; (2) a description of the refuge and its purposes, resources, and management; (3) an overview of the CCP and EIS process; and (4) the project schedule.

After the presentation, the remainder of the meeting was divided into two components: questions and answers and public comments. During the question and answer session, the facilitator took questions from the audience, all of which we answered. Most of the meeting time was spent in the question and answer session. Following the question and answer period, we took comments from those who wanted to offer them. This format enabled participants to have their questions answered about the planning process and also identified many of the important issues.

---

## Other Briefings

As part of the scoping process, we briefed or gave presentations to the City of Commerce City Council, the Denver Parks and Recreation Department, DIA management, the Rocky Mountain Arsenal Committee, and others.

---

## 5.2 Agency and Tribal Coordination

In accordance with the Service's planning policy, the preplanning and scoping process began with formal notification and a personal invitation to Native American tribes; other Federal, State, and local agencies with a land management interest; locally elected officials; and municipalities, inviting them to participate as cooperating agencies and members of the planning team.

---

## Native American Tribes

We sent letters of notification about the planning process, including an invitation to participate on the planning team, to the following tribes: Northern Arapaho Tribe, Northern Cheyenne Tribe, Southern

Ute Tribe, and Ute Mountain Tribe. We will work with tribes who are interested in the planning process.

## Federal, State, and Local Agencies

We sent letters of notification about the planning process, including an invitation to participate on the planning team, to the following agencies, groups and municipalities: EPA, FHWA, U.S. Department of Agriculture—APHIS, U.S. Army, Colorado Parks and Wildlife, CDPHE, TCHD, Adams County Board of Commissioners, City of Commerce City, City and County of Denver, and DIA.

### 5.3 Cooperating Agencies

The following agencies have participated as cooperating agencies in the development of the draft CCP and EIS: FHWA, U.S. Department of Agriculture—APHIS, UDFCD, U.S. Army, Colorado Parks and Wildlife, TCHD, Adams County, City of Commerce City, Denver City and County, Denver Water, and DIA. They have provided input on the refuge’s vision and goals, alternatives development, environmental consequences, and the internal review of the draft CCP and EIS. We greatly value the input that we have received from the cooperating agencies.

### 5.4 Scoping Results

The following summarizes the methods for comment collection and analysis and a summary of scoping comments. The planning team collected comments, questions, and concerns about the future of the refuge through public meetings, letters, email, and other methods as described above.

## Methods for Scoping Comment Collection and Analysis

The objective of the scoping process is to gather the full range of comments, questions, and concerns that the public has about management of the refuge or the planning process. All comments, questions, or issues—whether from written submissions or

recorded at the public meetings—were organized by topic. Every effort was made to document all issues, questions, and concerns. Regardless of whether comments and questions were general or about specific points of concern, they were added to the list one time.

We provided the following optional questions to the public:

- What are the qualities and characteristics that you most value about the Rocky Mountain Arsenal National Wildlife Refuge?
- What do you consider to be the most important issues concerning the Rocky Mountain Arsenal National Wildlife Refuge that should be addressed in the refuge planning process?
- What opportunities exist to manage wildlife habitat, provide for priority wildlife-dependent public uses, and develop partnerships with the community?

All the comments we received from individuals on our NEPA documents become part of the official public record. We handle all requests for information contained in comments in accordance with the Freedom of Information Act, NEPA (40 CFR 1506.6 (f)), and other DOI and Service policies and procedures.

## Summary of the Scoping Comments

During the initial scoping process, we received input on a wide array of topics and subtopics. Comments were submitted in writing or offered at the public meetings held in July and August in Denver, City of Commerce City, Stapleton, and Montbello, Colorado.

### 1. Big Ideas

- Work to connect people to nature, particularly the grasslands. It takes education for people to appreciate the grasslands.
- People see it as a no-man’s land and have no idea what is there. We need to get the word out about the beautiful resources.
- It is a challenge to overcome the refuge’s history and reputation and to reframe it as a welcoming place for neighbors.

- Set clear expectations. Educate people about what is there (wildlife and habitats). It is not a zoo—seeing wildlife is not a guarantee—it is about experiencing a natural setting.
- Maintain the quiet, the soundscape, and the sense of retreat from the surrounding urban setting.
- Work toward authentic engagement with partnership organizations for environmental education in classrooms and outside. It should be well documented and in place to outlive staffing changes.
- We don't want history to fade into the background. It is an important piece of this unique refuge. Leave behind some of the Arsenal's history. Balance sharing the site's history and the evolution of the property with reassuring people that it is now clean and that visitors are welcome.

## 2. Suggestions for New or Expanded Facilities

- Add more hiking trails.
- Acquire a mobile Visitor Center (to take off-site or to have on other parts of the refuge. It could offer interpretive information and sell snacks).
- Add signs that explain the reasoning behind rules and regulations.

## 3. Access and Modes of Travel

- Provide access to areas up north that are great for bird watching.
- Allow biking on the roads.
- Expand the bus tour and Wildlife Drive.
- Reopen the Havana Street entrance. The Montbello neighborhood feels cut off. The neighborhood appreciated having access right there instead of having to go on the highway.
- Improve transportation connections to the refuge from neighborhoods (bus, safe bike routes).

## 4. Ideas for Interpretation

- Offer audio interpretation for the auto tour route.
- Increase the amount of interpretive signs.
- Interpretation should extend outside the Visitor Center. Interpret natural resources and history onsite.
- Interpret the history, evolution, and restoration of the site. We don't want these historical layers to get lost.
- Consider using artwork or interpretive sculptures to spur conversation and reflection about the history and evolution of the site.
- Invite a storyteller to come out and share the site's history.
- Share insights into animal behavior, little facts that enhance the visitors' experience.
- Provide backpacks that families can "check out" at the Visitor Center that are full of activities that get kids excited.

## 5. Ideas for Environmental Education

- This area of Denver lacks environmental education opportunities.
- Increase outreach to schools and encourage use by school groups.
- Work with schools. Get the kids out there and they will get their parents out there if they get excited about it.
- Have K–8 grassland program in place.
- Encourage more interactions between the refuge and smaller nature and education organizations.

## 6. Hunting

- Do not allow hunting.
- Hunting has taken over as the dominant use on other refuges.

## 7. Outreach and Community Engagement

- Bring in nontraditional visitors.

- Provide more activities for families.
- Create more opportunities for Citizen Science.
- Remove some of the chain link fencing (along 56th Avenue) to make it appear more natural, more welcoming.
- Educate the surrounding communities about what is on the refuge and why we are conserving species.
- Distribute more information about the refuge. Make public announcements.
- Host contests on impressions of the refuge.
- It is important to take a critical look at the messages we are giving to people of color as we go through this process. Show people of color in our communications. Train staff to understand cultural diversity.

Subsequently, we identified eight significant issues or topics to address (please refer to chapter 1):

1. Seize the opportunity to connect people to nature at the refuge.
2. Improve promotion and conduct more outreach about the refuge and what it has to offer.
3. Set clear expectations about what a wildlife refuge is, does, and offers.
4. Maintain the sense of retreat from the surrounding urban setting.
5. Collaborate with partners to improve environmental education opportunities on and off the refuge.
6. Interpret the site's history.
7. Build new visitor facilities and expand programming (such as more trails, better signs, enhanced interpretive media, more environmental education, increased outreach).
8. Improve access and transportation systems (such as more biking opportunities, additional entry points, expanded wildlife drive, neighborhood connections).

## 5.5 Development of Draft Alternatives

We consider alternatives development in the preparation of a draft CCP and EIS to be an iterative process, meaning it evolves during the course of plan development. Alternatives development began in the winter of 2013–2014. The core planning team developed four approaches to managing the refuge: three action alternatives and the no-action alternative (that is, maintaining current management direction). Alternative C was designated the preferred alternative. Each of the draft alternatives presented a different approach for future management with varying focus on wildlife and habitat management and visitor services. Following further input from Service staff and our cooperating agencies, we refined and adjusted the alternatives. Following the completion of an internal draft of the CCP/EIS, the planning group met to review environmental impacts, the degree to which agency goals would be met, and the costs associated with each alternative. The group then discussed and selected a preferred alternative, which was a blend of alternatives C and D, but which most closely resembled alternative C. Members of the multi-agency team then met with the boards and commissions of the City of Commerce City and City and County of Denver to brief them on the decision and reasoning.

## 5.6 Release of the Draft CCP/EIS

### Outreach Activities Related to the Draft CCP/EIS

The draft CCP/EIS was released for public review on May 6, 2015, for a 60-day review and comment period following the publication of a notice of availability in the Federal Register. That period ended July 6, 2015. We sought further input from agencies, organizations, and the public during workshops held in June 2015. Fewer than 10 persons attended four public meetings held in the following locations:

- June 1, 2015. Reunion Recreation Center, Commerce City, CO

- June 4, 2015, Green Valley Recreation Center, Denver, CO
- June 9, 2015, Central Park Recreation Center, Denver, CO
- June 11, 2015, Commerce City, Recreation Center, Commerce City, CO

Public meetings included a presentation by Service staff, an opportunity for reading formal comments into the record, and a more informal question and answer session. Questions that the Service felt were of interest to the general public were recorded, and responses are shown in the comments and responses section later in this chapter. Members of the public were encouraged to submit written comments to the project website: [http://www.fws.gov/mountain-prairie/refuges/co\\_rkm.php](http://www.fws.gov/mountain-prairie/refuges/co_rkm.php) or to mail them in writing. The Service received a total of 11 comment letters or emails. Six of these were from agencies, two from organizations, and three from the general public. In total, the refuge received 123 comments in letters, emails, and comments made at the workshops.

## 5.7 Comments and Responses on Draft CCP/EIS

This section presents:

- Copies of written comments from Federal, State, and local government agencies and organizations, with responses to those comments.
- A summary of comments from individuals and responses to substantive comments from individuals.

The primary purpose of this section is to address the substantive comments received on the draft CCP/EIS. As defined by the NEPA compliance guidelines, comments are considered substantive if they:

- Question, with reasonable basis, the accuracy of the information in the document.
- Question, with reasonable basis, the adequacy of the environmental analysis.
- Present reasonable alternatives other than those presented in the EIS.

- Cause changes or revisions in the proposal.

We have responded to each of the substantive individual comments and, where appropriate, have made changes to the text of the draft CCP/EIS to produce this final EIS and, ultimately, a final CCP. Although some of the comments do not meet the regulatory definition of substantive, we have also chosen to respond to some non-substantive comments where the public displayed a strong interest.

The comments and responses are divided into two sections. The first section provides copies of the comments made by Federal, State, local, and tribal government agencies as well as tax-exempt nonprofit organizations. The second section presents a summary of the comments made by the general public or other entities, including both written comments and comments made at one of the four public meetings.

In compliance with the spirit of the Privacy Act of 1974, it is the policy of Region 6 to not routinely publish names, addresses, or other personal information of individuals (agencies and organizations are excluded from this policy).

## Responses to Agency and Organization Comments

We received formal comments from the following agencies and organizations:

1. Environmental Protection Agency
2. U.S. Army
3. Colorado Department of Public Health and Environment
4. City of Commerce City
5. Denver Department of Aviation
6. Denver Parks and Recreation
7. Defenders of Wildlife Rockies and Plains Office
8. Audubon Society of Greater Denver

Letters from these agencies and organizations are shown in the following pages. Next to each reproduced letter is our response, numbered to correspond to specific comments in the letter.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region08](http://www.epa.gov/region08)

JUL 06 2015

Ref: EPR-N

Mr. Will Meeks  
Assistant Regional Director  
National Wildlife Refuge System  
U.S. Fish and Wildlife Service  
P.O. Box 25486  
Denver Federal Center  
Denver, Colorado 80225-0486

Re: Rocky Mountain Arsenal National Wildlife Refuge Draft Comprehensive Conservation Plan  
and Environmental Impact Statement, CEQ 20150128

Dear Mr. Meeks:

The U.S. Environmental Protection Agency Region 8 has reviewed the *Rocky Mountain Arsenal National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Impact Statement* (EIS) prepared by the U.S. Fish and Wildlife Service (the Service). Our comments are provided for your consideration pursuant to our responsibilities and authorities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information, the EPA is rating the action alternatives EC-2 (Environmental Concerns-Insufficient Information). This letter documents the EPA's concerns and recommendations for the Final EIS. A full description of the EPA's rating system can be found at [www.epa.gov/compliance/nepa/comments/ratings.html](http://www.epa.gov/compliance/nepa/comments/ratings.html).

**PROJECT BACKGROUND AND DESCRIPTION**

In 1942, the U.S. Army purchased almost 20,000 acres from Colorado homesteaders in Adams County to develop a chemical munitions plant, the Rocky Mountain Arsenal (RMA), during World War II. After the war, Shell Oil Company leased buildings at the RMA and produced chemical insecticides until 1982. Chemical weapons production ended in the 1970s and in 1987, the RMA was placed on the EPA's National Priorities List (the Superfund) after an investigation of site contamination. Sites listed on the National Priorities List are the Nation's most hazardous sites. The EPA, U.S. Department of Interior, Agency for Toxic Substances and Disease Registry, the State of Colorado, and the U.S. Army signed a Superfund Federal Facilities Agreement (FFA) in 1989, outlining the responsibilities of the signatories for the environmental cleanup. Finally, Congress passed the Rocky Mountain Arsenal National Wildlife Refuge (RMANWR) Act (Refuge Act) in 1992, establishing the RMA as a national wildlife refuge and declaring that once cleanup was complete and certified by the EPA, the Service would assume management responsibility. The refuge was officially established in 2004 with the initial transfer of

**Comment number**

**LETTER #1—U.S. Environmental Protection Agency, page 2 of 4**

**RESPONSE**

almost 5,000 acres from the Army to the Service. At present, the Service manages almost 16,000 acres and the Army retains approximately 1,000 acres for ongoing operation, maintenance and monitoring activities.

The Service is required by the National Wildlife Refuge System Improvement Act of 1997 (Improvement Act) to update their comprehensive conservation plans (CCPs) every 15 years. The purpose of this Draft CCP/EIS is: (1) to comply with the Improvement Act, (2) to describe the role of the refuge in supporting the mission of the Refuge System to “administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of fish, wildlife, and plant resources, and their habitat within the United States for the benefit of present and future generations,” and to provide long-term guidance for management of refuge programs and activities.

The Draft EIS describes and analyzes the environmental impacts of three action alternatives (B, C, and D), as well as the no action alternative (A). Alternative B – Traditional Refuge would provide traditional refuge visitor uses with less access than the other action alternatives. Alternative C – Urban Refuge would increase the visibility of the refuge within the Denver metropolitan area and connect more people with nature. Alternative D – Gateway Refuge would emphasize increasing visibility of the refuge, refuge system and other public lands in the area, and would require more partnerships and volunteers than Alternative C. The Service’s preferred alternative is Alternative C.

**EPA CONCERNS**

The RMANWR is a major Superfund cleanup site and EPA remains in an oversight role for the implementation and operation and maintenance of the remedies. Following are our more specific concerns about the proposed actions in this Draft CCP/EIS.

Land Use

The Service proposes certain land uses and activities that are currently prohibited by the *Federal Facility Agreement* (EPA 1989), the *Record of Decision for the On-Post Operable Unit* (ROD) (FWENC 1996), and the *Land Use Control Plan* (LUCP) (Navarro 2013), such as hunting deer and doves. Unrestricted public access to certain areas may also be inconsistent with the regulatory documents and agreements. While Chapter 2 describes the current land use restrictions, the Final CCP/EIS should clearly explain that some of the proposed activities and land uses are not specifically allowed under those documents and that any proposed changes that may affect the conditions of the Refuge Act, the FFA, the ROD or the LUCP need to be discussed and coordinated with the EPA, the State, the Army, Shell and Service Refuge Managers through the Superfund process. We also recommend that the Final CCP/EIS describe the specific process that must be used when proposing to change land use restrictions. This process could involve collecting additional representative and defensible data; preparation of a risk assessment; preparation of the appropriate modifications to the FFA, the ROD and the LUCP; and approval by the EPA and the Colorado Department of Public Health and Environment (CDPHE). We suggest that the Service work closely with the EPA Superfund staff (Greg Hargreaves, 303-312-6661) and the CDPHE to determine the appropriate process.

Other land use concerns are:

- Divestiture – If the Service decides to pursue divestiture of any portion of the RMANWR, the Service needs to identify the land use restrictions in the associated land-transfer documents (e.g.,

**1-1.** We are aware of the language of the Federal Facility Agreement, ROD, and LUCP and the process recommended to change these restrictions. On page 111 of the draft CCP/EIS, the document states “The FFA currently prohibits the take of any wildlife on refuge property for consumptive purposes. Until this restriction is removed, a hunting program will not be established.” We are currently working to make the necessary changes to these restrictions, and look forward to EPA and other agency cooperation in this regard.

**1-2.** There is no specific process for removing or modifying land use restrictions. The Service is working with the entities described in developing a process.

**1-3.** Divestiture is not part of this plan (see section 2.9). However, in the event of any sale/transfer of land, any restrictions would be included with appropriate real estate documentation.

Comment  
number

## LETTER #1—U.S. Environmental Protection Agency, page 3 of 4

## RESPONSE

<p><b>1-4</b></p> <p>deed restrictions, conditions of a lease, etc.). Please add this information to the discussion about potential divestiture in the Final CCP/EIS.</p> <ul style="list-style-type: none"> <li>Enhanced access – The EPA believes that certain access restrictions are necessary because the Superfund clean-up was not designed for unrestricted use and because there are remedy structures in place that are necessary to protect human health (e.g., caps and covers over waste left in place and treatment plants/groundwater wells to treat and monitor contaminated groundwater). The EPA recommends that the Final CCP/EIS integrate the requirement for access restrictions at RMANWR into the alternatives and commit to putting locks on the individual monitoring wells to avoid tampering.</li> <li>Transmission lines – Each of the alternatives include plans to modify the transmission lines by either burying or relocating them. For public health reasons, the EPA recommends that any infrastructure work conducted at the RMANWR be coordinated closely with the Army to avoid excavation in areas where there is the possibility of encountering contamination within the RMANWR (e.g., around historical sanitary sewer lines that were abandoned in place at the previously excavated lake sediment site in Section 12) or inadvertent disturbance of remedy structures.</li> </ul> <p><u>Water Resources</u></p> <p>The Draft CCP/EIS describes actions that may result in an alteration to the site hydrology such as changing the Texas Crossing that is associated with stormwater runoff from the hazardous waste landfills. The RMANWR land use restrictions prohibit non-remedy alterations that may have an adverse impact on the natural drainage of RMANWR for floodplain management, recharge of groundwater, or operation of Response Action Structures. The Final CCP/EIS should include a stipulation that a hydrologic evaluation be conducted to evaluate the potential for impacting groundwater recharge, flow, monitoring, extraction, or treatment prior to initiation of alterations to the existing site configuration that may impact surface water or groundwater.</p> <p>Information regarding water quality is inconsistent in the Draft CCP/EIS. On page 99 in Chapter 4 – Affected Environment, the document states “In most cases, incoming streamflows have failed to meet State standards for water quality (Gordon et al. 2005).” Citing the same report in the following chapter, Environmental Consequences, page 134, the document states, “Overall, the quality of water flowing onto the refuge is good.” The subsequent text does state that the increased development around the refuge could adversely affect water quality and that monitoring will be needed in the future. However, according to the most recent listings (2012) by the CDPHE for Clean Water Act 303(d) impaired streams, the segment that First Creek on the refuge is a part of is impaired for selenium. The EPA recommends including this information in the Final EIS and resolving the inconsistency in the water resources sections of chapters 4 and 5.</p> <p><u>General</u></p> <p>Thank you for taking the time to meet with us on June 22. At that meeting, attended by the Refuge Manager and the Deputy Refuge Manager from the Service and the Remedial Project Manager and lead NEPA reviewer from the EPA, the Service agreed to remove the EPA from the list of cooperating agencies for this NEPA document and acknowledge that EPA Region 8’s NEPA Compliance and Review Program was not involved with the planning for or review of this Draft EIS before it was published. During the meeting, the EPA also recommended moving Appendices A and B into the main</p>	<p><b>1-4.</b> The U.S. Army’s Long-Term Monitoring Plan for groundwater monitoring wells acknowledges the need to protect wells from damage and from possible contamination from foreign substances. To minimize the potential for damage to the monitoring well system, the U.S. Army evaluated proximity of monitoring wells to public access areas (e.g., trails) and identified wells that should be locked. As visitor access expands, additional wells that should be locked may be identified.</p> <p><b>1-5.</b> This plan will not address the large overhead power lines on the refuge (see section 1.8). These lines were installed in 1947 to support the U.S. Army’s operations and occupy an easement that will not expire until 2047. Burying these power lines would be very expensive and the Service does not consider the added cost to be economically feasible. We would support rerouting these lines, but that decision rests with Xcel Energy. As appropriate, the Service will coordinate with the U.S. Army.</p> <p><b>1-6.</b> As appropriate, the Service will coordinate placement of a bridge over the Texas Crossing. This low-water crossing is currently made of concrete block so that vehicles can be driven down and through the area. The crossing rarely, if ever, sees any water and creates any water and creates a potentially dangerous traffic issue that can be easily corrected with a bridge.</p>
<p><b>1-5</b></p> <p><b>1-6</b></p> <p><b>1-7</b></p> <p><b>1-8</b></p>	

**Comment number**

**LETTER #1—U.S. Environmental Protection Agency, page 4 of 4**

**RESPONSE**

**1-9**

document. This is required by the NEPA implementing regulations regarding the content of an EIS, 40 CFR 1502.10 (h) list of preparers and (i) list of agencies, organizations, and persons to whom copies of the statement are sent.

The Summary section of the Draft CCP/EIS states that the environmental cleanup was concluded in 2012. This statement is incorrect. As acknowledged in Chapter 4, the Superfund cleanup of the soil and structures was completed in 2011, and the cleanup is ongoing with the extraction and treatment of contaminated groundwater within, north, and northwest of the RMANWR. Please correct the Summary.

Thank you for the opportunity to provide comments on the Rocky Mountain National Wildlife Refuge Draft CCP and EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6704 or Carol Anderson of my staff at 303-312-6058.

Sincerely,



Philip S. Strobel  
 Director, NEPA Compliance and Review Program  
 Office of Ecosystems Protection and Remediation

cc by email: Bernardo Garza, U.S. Fish and Wildlife Service

**1-7.** The final EIS was updated to include text verbatim from the Gordan et al. 2005 report. As described on p. 99, the refuge's lakes and reservoirs were changed to a new segment in 2009 (Segment 22) and later reclassified in 2014 (Segment 22b). Segment 16c does include First Creek and also includes "all tributaries to the South Platte River, including all wetlands, from the outlet of Chatfield Reservoir, to a point immediately below the confluence with Big Dry Creek", is listed on the 303(d) listing for selenium (a naturally occurring element). This is a very broad determination and we will rely on site-specific information found in Gordan et al.

**1-8.** The U.S. Environmental Protection Agency declined our invitation to participate as a cooperating agency. Your agency will be removed from the list.

**1-9.** This has been corrected in the Summary.



Printed on Recycled Paper

7/6/2015

DEPARTMENT OF THE INTERIOR Mail - comments on the CCP (UNCLASSIFIED)



Garza, Bernardo <bernardo\_garza@fws.gov>

**comments on the CCP (UNCLASSIFIED)**

1 message

**Ober, Roberta L CIV USARMY USAG (US)** <roberta.l.ober.civ@mail.mil> Mon, Jul 6, 2015 at 3:15 PM  
 To: "Hastings, Bruce" <bruce\_hastings@fws.gov>, David Lucas <david\_c\_lucas@fws.gov>, Bernardo Garza <Bernardo\_Garza@fws.gov>  
 Cc: "Scharmann, Charles T CIV USARMY USAG (US)" <charles.t.scharmann.civ@mail.mil>, "Thomson, Mark" <mark.thomson@aeocom.com>, "Cable, Kelly" <kelly.cable@aeocom.com>

Classification: UNCLASSIFIED  
 Caveats: NONE

My comments on the CCP:

**2-1**

1. Page 6, Section: RMANWR Act of 1992, states that that Act is reproduced in Appendix E, however, the amendment to the act is not shown. Consider adding the amendment for accuracy/completeness.

**2-1.** A footnote was added to appendix E.

**2-2**

2. Page 47, Section: Hunting, states that deer and dove hunting would be allowed. A statement is needed that hunting and consumption of these species would occur after the Land Use Restrictions on page 27 are modified to allow such. Also, state that additional details are provided on Page 149 as the reader may have questions regarding the type of hunting (e.g., archery/shotguns) and location of hunting areas at this point in the text.

**2-3.** Summer camps as described in this plan may be either day or overnight camps. Details will be determined in the future.

**2-3**

3. Page 53, Section: Environmental Education and Interpretation, clarify that "summer camps" are "summer day camps" if that is the case.

**2-4.** This section describes the current hours of operation. Access to national wildlife refuges is monitored by refuge law enforcement officers.

**2-4**

4. Page 56, Section: Points and Types of Access, states that additional pedestrian/bicycle access points will be added. Page 43, Section: Hours of Operation, states that the refuge would be open from sunrise to sunset. It is unclear how refuge hours will be enforced at these new access points.

**2-5.** After careful consideration, we agree that one additional officer would not be adequate to fully ensure visitor safety and wildlife protection, and so have modified our economic analysis (section 4.9), personnel estimates (table 7) and costs for alternatives C and D (table 20) to add new officers. In addition, site planning will identify more specific gate designs, areas that would be more frequently patrolled, and fences or other physical features to help in maintaining security for visitors and protection of refuge facilities and wildlife.

**2-5**

5. Page 70, Section: 3.11 Funding and Personnel, states that a major issue at present is that current staffing does not provide adequate security and visitor safety and that a minimum of one additional law enforcement officer is needed. Appendix I states that there will be dramatic annual increases in visitation. It appears that a more comprehensive plan is needed to address security and visitor safety, with adequate funding to implement the plan.

Comment number

LETTER #3—Colorado Department of Public Health and Environment, page 1 of 2

RESPONSE



Dedicated to protecting and improving the health and environment of the people of Colorado

July 2, 2015

Planning Team Leader  
Bernardo Garza and Toni Griffin  
U.S. Fish and Wildlife Service  
Division of Refuge Planning  
134 Union Boulevard, Suite 300  
Lakewood, Colorado 80228

Re: Colorado Department of Public Health and Environment Comments to Rocky Mountain Arsenal Comprehensive Conservation Plan and Environmental Impact Statement

Dear Mr. Garza and Ms. Griffin:

The Colorado Department of Public Health and Environment has several broad-based comments to *Rocky Mountain Arsenal National Wildlife Refuge (RMANWR) Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/EIS)*, dated May 2015. They are as follows:

3-1

3-2

3-3

1. The Draft Plan (and website) cites Colorado Department of Public Health and Environment (CDPHE) as a member of the planning team and a collaborator on the document. Please remove us from your cited list of cooperating agencies. We have not actually been a participant in the planning process or the drafting of this document.

2. The property making up the Rocky Mountain Arsenal National Wildlife Refuge (RMANWR) is a former Superfund site and by its design, the Superfund Remedy selected for this site is dependent upon land use restrictions intended to remain on the property in perpetuity. Some of these ongoing land use restrictions appear to be in conflict with the USFWS' preferred "Alternative C", although they do not actually appear to conflict with offered Alternatives A and B. "Alternative C" land uses may be supported in the event that it is demonstrated via sampling, and other standard and accepted scientific risk assessment methodologies, that the proposed uses are appropriate. Specifically, the current land use controls on the site that appear to conflict with land uses offered under "Alternative C" are as follows:

- Hunting for human consumption (deer and dove)
- Agriculture/farming
- Modifications to the RMANWR hydrogeologic characteristics
- Modifications to site access or site controls

3. The CCP/EIS states that the Upper Derby dam may be breached. This could have an adverse effect on the natural drainage of the Arsenal, known groundwater plume paths, and thus could potentially impact the operation and maintenance of some Response Action Structures. CDPHE recommends that the USFWS communicate this proposal with the

4300 Cherry Creek Drive S., Denver, CO 80246-1530 P 303-692-2000 www.colorado.gov/cdphe  
John W. Hickenlooper, Governor | Larry Wolk, MD, MSPH, Executive Director and Chief Medical Officer



**3-1.** The Colorado Department of Public Health and Environment declined our invitation to participate as a cooperating agency. Your agency will be removed from the list.

**3-2.** A Federal Facility Agreement was developed in 1989 to guide cleanup activities on the Arsenal; Section 44 of this agreement includes several land use restrictions. The 1996 ROD for the site incorporated many of these land use restrictions. As stated, we are working with the appropriate regulatory agencies to remove or modify unnecessary land use restrictions on the refuge (page 27 of the draft CCP/EIS).

**3-3.** A Federal Facility Agreement was developed in 1989 to guide cleanup activities on the Arsenal; Section 44 of this agreement includes several land use restrictions. The 1996 ROD for the site incorporated many of these land use restrictions. As stated, we are working with the appropriate regulatory agencies to remove or modify unnecessary land use restrictions on the refuge (p. 27 of the draft CCP/EIS).

**3-4.** As stated, the refuge will not accept transfer of the U.S. Army's dams until the necessary repairs are made on Lower Derby Lake, Lake Ladora, and Lake Mary. Upper Derby Lake will be partially breached prior to transfer and would no longer be considered a dam (page 43 of the draft CCP/EIS). As appropriate, it will be the U.S. Army's responsibility to coordinate these activities.

**Comment number**

**LETTER #3—Colorado Department of Public Health and Environment, page 2 of 2**

**RESPONSE**

**3-5**

USArmy/Shell/EPA/CDPHE/TCHD, via the Rocky Mountain Arsenal Water Team, prior to any action.

4. Additionally, there is a discussion in the CCP/EIS regarding a modification of the Hazardous Waste Landfill (HWL) and Enhanced Hazardous Waste Landfill (ELF) Stormwater Conveyance System (a.k.a., Texas Water Crossing). The proposed modification would impact the landfills' engineered stormwater conveyance system that has been designed in accordance with environmental law and if implemented, will result in the system becoming out of compliance with the terms and conditions of the landfill's closure. Any redesign of this structure must be conducted under Colorado Hazardous Waste Regulations, and be designed to meet thousand year storm criteria.

A series of more specific comments to the CCP/EIS will be submitted to the USFWS/USArmy/Shell at the Rocky Mountain Arsenal. Thank you for your consideration.

Sincerely,



Susyn Kay Newton  
 Rocky Mountain Arsenal Project Officer  
 Hazardous Materials and Waste Management Division  
 Colorado Department of Public Health and Environment

**3-5.** As appropriate, the Service will coordinate placement of a bridge over the Texas Crossing. This low-water crossing is currently made of concrete block so that vehicles can be driven down and through the area. The crossing rarely, if ever, sees any water and creates a potentially dangerous traffic issue that can be easily corrected with a bridge.



June 18, 2015

Bernardo Garza  
 Division of Refuge Planning  
 Mountain-Prairie Region  
 U.S. Fish & Wildlife Service  
 134 Union Blvd  
 Lakewood, CO 80228

Dear Mr. Garza,

The City of Commerce City appreciates the opportunity to provide input on the draft comprehensive conservation plan for the Rocky Mountain Arsenal National Wildlife Refuge (RMANWR). We're excited for the opportunities at the Refuge and believe this master plan provides the right vision for the future of this regional asset.

The City has a vested interest in the future of this site, as the municipality borders almost three quarters of the property. The caliber of development surrounding the Refuge plays an important role to the mutual success of both entities. Further, our community's history is intertwined with the property, as residential impacts date back to the formation of the Arsenal and its role as a weapons manufacturer.

The City is excited about planning a bright future for the area. That's why the City actively participated in and discussed the U.S. Fish & Wildlife Service (USFWS)'s planning process over the last two years. In July 2013, City Council expressed its support for the Urban Refuge Alternative (Alt-C). The purpose of this letter is to reaffirm the City's support for the Urban Refuge Alternative, the Preferred Alternative advanced in the Draft Comprehensive Conservation Plan and Environmental Impact Statement for the RMANWR.

This letter also provides the City of Commerce City's formal comments on the document, which are listed below.

The City of Commerce City looks forward to working with the USFWS to implement the identified Preferred Alternative. We request USFWS prioritize implementation of the identified improvements in the Final EIS and Record of Decision as follows:

1. Creating an inviting and aesthetic grand entrance
2. Building a new education center, preferably adjacent to the existing Visitor's Center
3. Completing the perimeter trail
4. Path of Distinction
5. Installing wayfinding signage
6. Completing the Henderson Hill Trail and Overlook
7. Restoring the Egli Homestead

7887 E. 60th Ave., Commerce City, CO 80022 Tel: 303-289-3600 Fax: 303-289-3688 www.c3gov.com

4-1

**4-1.** Following issuance of the final EIS, the Service's planning team will develop a final CCP. The final CCP will discuss sequencing of projects, but implementation will likely be driven by the availability of funding. Our goal will be to implement the plan in its entirety.

Comment  
number

## LETTER #4—City of Commerce City, page 2 of 3

## RESPONSE

Comment Letter  
Page 2

4-2	<p>The City supports the plan's decision not to open additional vehicular access points to the Refuge, as referenced on page 68.</p>	4-3. Thank you for your comment. Where appropriate, we will support your work to remove/modify restrictions set forth in the Rocky Mountain Arsenal National Wildlife Refuge Act of 1992 that affect the Victory Crossing properties.
4-3	<p>The City supports the RMANWR's goals of altering the land use restrictions on the Refuge. We believe it is a critical step to fulfill the vision of the Preferred Alternative and is consistent with Secretary Jewell's Urban Refuge Initiative. The City requests RMANWR's support of similar actions being advanced to alter the land use restrictions on the former refuge property, known as Victory Crossing, purchased by the City.</p>	4-4. Thank you for your comment.
4-4	<p>The City supports the reintroduction of the Black-Footed Ferret to the refuge and appreciates the coordination with USFWS on the reintroduction plan.</p>	4-5. Interpreting the unique history of the Rocky Mountain Arsenal is a component of this plan. If the City of Commerce City or another entity agrees to finance the design and construction of such a path, the refuge would be happy to consider it.
4-5	<p>The City supports inclusion of a "Path of Distinction" within the Final EIS and Record of Decision, which would highlight the contributions of individuals who participated in the historical transformation of the Arsenal to the Refuge of today. This interpretative educational walkway would be adjacent to the current Pat Schroeder Visitor Center and the City looks forward to partnering with the USFWS to design and construct the proposed enhancement.</p>	4-6. We anticipate only modest parking at this location and elsewhere (see "56th Avenue" on page 64 of the draft CCP/EIS, for example). In addition, we would install wayfinding signs at each smaller parking area to direct visitors to the main entrance. Of note, our experience indicates that visitors will "create" parking lots at entry sites if one is not already designed and created; this is why we have proposed smaller lots at this site and others.
4-6	<p>The City of Commerce City is concerned with the proposed parking at trailhead access points, specifically those proposed along 56th Avenue. The City understands these trailheads are meant to allow adjacent communities better access to the amenities of the Refuge, which the City strongly supports. With robust parking, the City fears outside visitors may mistake one of the trailheads for the main entrance of the refuge, creating confusion. If the trailheads are primarily meant for local, neighborhood access, the City proposes very limited, ADA-accessible parking at the trailheads, which will encourage the surrounding community to walk or bike to the trailhead and reduce confusion for outside visitors. The City strongly requests wayfinding signage be installed to guide visitors to the main entrance of the refuge.</p>	4-7. Thank you for your comment.
4-7	<p>The City appreciates the Henderson Hill Trail and Overlook proposed in the Preferred Alternative. By setting the fence back in this area, it extends the sense of community and makes the RMANWR more of a community space.</p>	4-8. Thank you for your comment.
4-8	<p>The City supports the concept of the "Partner" Village as described in Alternative C.</p>	4-9. Between 56th Avenue and 96th Avenue, ownership varies between the Service, the City and County of Denver, and the City of Commerce City. We will work with all parties on future management of Buckley Road.
4-9	<p>The City will be updating our transportation plan in 2016 and will explore the potential plans for the existing Buckley Road in the context of the CCP. We look forward to coordinating on other transportation issues impacting the Refuge.</p>	4-10. Thank you for your comment.
4-10	<p>The City supports adding bicycle and pedestrian access points that are designed to maximize safety. We also support working with RTD to connect neighborhoods to the Refuge via the public transit system.</p>	
4-11	<p>While Commerce City supports the proposed expansion of the bison area, it is important viewing opportunities for bison remain from Highway 2 and Quebec Street after expansion. The City requests inclusion in expansion discussions between RMANWR and DIA as the City is designing and constructing a new on-ramp from Tower Road to westbound Peña Boulevard. The future fence line should be designed so it does not impact the ramp.</p>	
4-12		

**Comment number**

**LETTER #4—City of Commerce City, page 3 of 3**

**RESPONSE**

Comment Letter  
Page 3

**4-13**

The city requests the access point at 96th Avenue be sited and designed in such a way as to maximize pedestrian safety.

**4-11.** Bison travel great distances to satisfy their needs. As long as we provide quality habitat for bison along Highway 2 and Quebec Street, we believe bison will spend time in these areas.

**4-14**

The City requests stormwater conveyance off of the refuge site should be coordinated with the widening of Highway 2, beginning in 2015.

**4-12.** The Service will consult with our neighbors when constructing any new fences along the refuge's borders

**4-15**

The City is amenable to the location of the proposed Wildlife Observatory/Overlook adjacent to Highway 2 and would like to explore design considerations as a part of the Highway 2 widening project, so that an overlook is not precluded in this area.

**4-13.** The Service will coordinate with the City of Commerce City's Director of Public Works to ensure that any design is consistent with planning for any future expansion of 96th Avenue and to ensure pedestrian safety.

**4-16**

The City supports the proposed land exchange as outlined in Section 3.8.4 for 96th Avenue.

**4-17**

The City questions the purpose for the new multi-use trail entrance north of 88th Avenue along the Buckley Road alignment? Is this a connection to the trail to the east? If not, it is recommended that this proposed trail entrance be located further to the south and have parking. Buckley Road is closed, with 88th Avenue dead ending at the Refuge. The only vehicular access to this trail entrance will be on E 88th Avenue from Tower Road.

**4-18**

The City supports increased communication and education from the USFWS to the surrounding community regarding wildlife safety.

**4-14.** The Service is currently coordinating with the City of Commerce City's Director of Public Works on the Highway 2 project.

**4-19**

The City found a few incorrect items on the maps (Alternative A, B, and C). Attached is a redlined version for your use in updating the Final EIS and Record of Decision.

**4-20**

The trail along the O'Brian Canal in the northwest corner of the map is a proposed multi-use trail that has not been constructed.

**4-15.** The Service will coordinate with the City of Commerce City's Director of Public Works regarding the exact location of the proposed Highway 2 overlook and to ensure that the design is consistent with planning for the widening of Highway 2.

**4-21**

There are several existing multi-use trails shown south of the Adams City High School, which are sidewalks, not multi-use trails.

**4-22**

The open space at the entry to the refuge should be labeled City of Commerce City Prairie Gateway Open Space.

In closing, the Refuge is an asset to the entire Denver metropolitan region. The City of Commerce City pledges continued partnership with the USFWS to maintain its status as the nation's premier urban refuge and a model for the entire refuge system. Thank you for the opportunity to comment; we look forward to working with you in the future to achieve mutual success.

Sincerely,



Mayor Sean Ford

**4-16.** Thank you for your comment.

**4-17.** This has been corrected in the final EIS.

**4-18.** Thank you for your comment.

**4-19.** This has been corrected in the final EIS.

**4-20.** This has been corrected in the final EIS.

**4-21.** This has been corrected in the final EIS.

**4-22.** This has been corrected in the final EIS.



c: David Lucas, refuge manager  
Brian McBroom, city manager  
Chris Cramer, director of community development



**DENVER**  
THE MILE HIGH CITY  
MICHAEL HANCOCK  
Mayor

**CITY AND COUNTY OF DENVER**

DEPARTMENT OF LAW  
D. SCOTT MARTINEZ  
CITY ATTORNEY

AIRPORT LEGAL SERVICES  
AIRPORT OFFICE BUILDING  
DENVER INTERNATIONAL AIRPORT  
8500 PEÑA BOULEVARD, 9TH FLOOR  
DENVER, COLORADO 80249  
PHONE: (303) 342-2540  
FAX: (303) 342-2552

July 6, 2015

Submitted via e-mail [rockymountainarsenal@fws.gov](mailto:rockymountainarsenal@fws.gov)

Bernardo Garza, Planning Team Leader  
U.S. Fish and Wildlife Service  
[Bernardo\\_garza@fws.gov](mailto:Bernardo_garza@fws.gov)

RE: Rocky Mountain Arsenal National Wildlife Refuge draft CCP and EIS

The City and County of Denver's Department of Aviation ("DEN") thanks you for the opportunity to comment on the Rocky Mountain Arsenal National Wildlife Refuge's (the "Refuge") Draft Comprehensive Conservation Plan and Environmental Impact Statement (the "Draft EIS"). These comments are submitted solely on behalf of DEN, which operates Denver International Airport, and in accordance with the notice of availability and request published at 80 Fed. Reg. 26084 (May 6, 2015). Any questions about these comments should be made to:

Debra Overn  
Assistant City Attorney, City and County of Denver  
8500 Peña Blvd., Room 9810  
Denver, CO 80249

303-342-2561  
[Debra.Overn@FlyDenver.com](mailto:Debra.Overn@FlyDenver.com)

DEN generally supports the Refuge's goals stated in Table S-1. However, DEN submits the following comments on specific statements in the Draft EIS.

Habitat and wildlife management

DEN supports the finding in the Draft EIS page 69 that fencing adequate to prevent migration of bison and other large animals onto airport land and facilities is necessary. To the extent that the Plan anticipates "different strategies for modifying the fence to maintain its important function while allowing access to refuge visitors and conveying a more inviting image," however, DEN requests that the Plan indicate that any such changes to fences protecting airport land and facilities will be made only after consultation with DEN.

The Draft EIS makes several statements about aircraft noise. DEN intends to expand over the next decades to its planned full buildout, as stated in the FEIS for DEN. Therefore noise may

**5-1.** Thank you for your comment.

**5-2.** The Service will consult with our neighbors when constructing any new fences along the refuge's borders. We agree with your concern and it is a priority that large animals are well contained.

**5.3.** Additional information has been added to the Soundscapes section of the final EIS.

**Comment number**

**LETTER #5—Denver International Airport, page 2 of 2**

**RESPONSE**

increase in the future as described in DEN's FEIS. DEN requests that this be acknowledged in this EIS as foreseeable.

Reintroduction of the black-footed ferret

As the Refuge knows, DEN has been working with the Refuge to identify how reintroduction of the black-footed ferret could be accomplished without affecting DEN's operation and growth. For this reason DEN supports the Biological Assessment included in the Draft EIS. DEN also supports the Biological Opinion and Incidental Take Statement issued April 21, 2015. DEN requests that the April Biological Opinion and Incidental Take Statement be incorporated into the Final EIS as part of the administrative record for the EIS.

Public uses and access

DEN is concerned about the alternatives that may allow hunting with firearms on the Refuge, and about the statements in Section D.3 that, "Hunting of big game and doves and hunter education programs are compatible uses of the Rocky Mountain Arsenal National Wildlife Refuge." Any firearm use on the Refuge could present a danger to the aircraft that use DEN's airfield. DEN supports the Draft EIS's finding on pages 67-68 that rifle hunting is incompatible with the Refuge's urban location. DEN requests that the final Plan and EIS state that recreational use of firearms on the Refuge will occur only after consultation with DEN, adoption of prudent management measures to ensure aircraft safety, and compliance with any applicable Federal Aviation Administration guidance or requirements.

DEN supports much of the Draft EIS's analysis of increased and improved trail access. However, DEN is concerned by statements that future trail segments will be constructed on City of Denver lands, and maintenance and upkeep will be the City of Denver's responsibility. DEN requests that such references either be removed or modified to indicate that such construction or maintenance on DEN property will occur only if an agreement is reached between the Refuge and DEN.

Infrastructure and Resource Management

If the selected alternative includes increasing solar arrays on Refuge property, DEN requests that such arrays will be constructed in a manner that avoids adverse effects on aircraft operations at DEN, and in compliance with any applicable Federal Aviation Administration guidance or requirements.

Thank you again for this opportunity to comment. DEN looks forward to continuing its close partnership with the Refuge well into the future.

Sincerely,  
  
 Debra Overm  
 Assistant City Attorney

**5-4.** Thank you for your comment. We agree; the biological opinion for reintroduction of black-footed ferrets has been added to appendix F.

**5-5.** Hunting with rifles will not be considered on the refuge (see section 2.9). Any hunting of deer would be archery only. Any hunting of doves would require the use of shotguns and small shot sizes that do not travel great distances (generally less than 500 feet for smaller shot sizes). The details of any hunt program will be detailed in a future Hunt Management Plan, and Denver International Airport may participate in this more detailed planning process.

**5-6.** Portions of the Refuge's Perimeter Trail not located on the refuge are to be maintained by the landowner.

**5-7.** Thank you for your comment. We will ensure that any siting of future solar arrays are in compliance with Federal Aviation Administration requirements.



**DENVER**  
THE MILE HIGH CITY

**Denver Parks and Recreation**  
Natural Resources Operations  
201 W. Colfax Ave., Dept. 605  
Denver, CO 80202  
p: 720.865.4334  
Wildlife Hotline: 720.913.0630  
[www.denvergov.org/PRIS](http://www.denvergov.org/PRIS)

July 6, 2015

U.S. Fish & Wildlife Service  
P. O. Box 25486 - Denver Federal Center  
Denver CO 80225  
Attn: Mr. Will Weeks, Asst. Regional Director

Dear Mr. Weeks:

Thank you for the opportunity to comment on the Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/EIS) for the Rocky Mountain Arsenal National Wildlife Refuge. The four alternatives outlined in the Plan provide detail and clarity for easy review and comparison of each alternative.

Denver Parks and Recreation (DPR) appreciates being involved in the development of the CCP/EIS, and takes a great interest in the management and success of the Rocky Mountain National Wildlife Refuge, who we consider as an important neighbor of DPR. One of our goals, as a park and recreation agency, that strives to provide quality recreational and outdoor opportunities to its citizens, is to increase our efforts in engaging more individuals, families and diverse populations in the outdoors. We also have an interest in preserving, conserving, and enhancing quality habitat for the benefit of both urban wildlife and people.

After careful review of the CCP/EIS document, DPR is in conceptual support of Alternative C, the Urban Refuge model, which we feel addresses the goals of not only DPR and USFWS's, but also the goals of the outlying community of the Refuge. We agree that Alternative C focuses on increasing the visibility of the refuge within the Denver Metropolitan area and will provide outdoor and recreational opportunities to more nontraditional visitors. Alternative C also allows for the refuge to be more accessible and inviting to the outlying communities by providing additional access points and development of enhanced transportation systems, which has been a long time vision of ours and the surrounding community.

With regards to the "Black-Footed Ferret Program, and the "display of live ferrets in an exhibit" - DPR would like to recommend that a thorough and thoughtful analysis of displaying live wildlife occurs before implementation.

CONTACT VISIT | CALL  
DenverGov.org | 311

6-1

6-1. Thank you for your comment.

6-2. It is not uncommon for the Service to display live threatened and endangered species for the public to observe. Such exhibits must comply with regulations for that species. As ferrets are nocturnal and the public will have limited opportunities to view wild ferrets, we believe that a live ferret exhibit will assist with the public's understanding of the black-footed ferret recovery program.

6-2

Comment  
number

LETTER #5—Denver Parks and Recreation, page 2 of 2

RESPONSE

We realize that there will be further review and discussion of these Alternatives as this process moves forward, and before the Plan is finalized and implemented. So please don't hesitate to contact us for further clarification or questions. We look forward to our continued partnership with USFWS and other representatives involved in this Plan, and hope that "Alternative C" will become a reality, by everyone working collectively to make it happen.

Sincerely,



Scott Gilmore  
Deputy Executive Director  
Denver Parks and Planning

Comment  
number

LETTER #7—Audubon Society of Greater Denver, page 1 of 3

RESPONSE



June 12, 2015

Division of Refuge Planning  
US Fish and Wildlife Service  
134 Union Blvd.  
Lakewood, CO 80228-1807

Re: Rocky Mountain Arsenal Draft Comprehensive Conservation Plan and EIS

Gentlemen/Ladies:

The Audubon Society of Greater Denver appreciates having the opportunity to comment on the Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP) for the Rocky Mountain Arsenal National Wildlife Refuge. The Society is a grassroots conservation organization with approximately 3,000 members in the Denver metro area, our mission is to advocate for the environment, connecting people with nature through education, research and conservation. Along with many other organizations, we worked hard to get the Arsenal designated as a future National Wildlife Refuge in 1989-1992, and we continue to run the fall, spring and Christmas Bird Counts on the Refuge.

A review of the CCP makes it clear that the Refuge has to walk a fine line between its purposes of conservation of wildlife and its habitats, especially endangered or threatened species, on the refuge, and provision for public use, including research, wildlife-oriented recreation, and environmental education. Set in a rapidly urbanizing area northeast of Denver, the Refuge will soon be completely surrounded by residential and commercial developments, and human pressures on wildlife habitats will be strong, as will the public's desire to be able to access and enjoy the Refuge.

Our first concern is that, whichever alternative is adopted, the promotion of public visitation, wildlife-based recreation, environmental education and interpretation should not significantly reduce or degrade wildlife habitat and wildlife diversity on the Refuge.

A second concern is that efforts to restore prairie ecosystems shouldn't result in the sudden elimination of the riparian zones, reservoirs, and various plantings that increase the Arsenal's habitat diversity. Some of these may naturally dwindle and disappear over the years, but while they last they add considerably to the visitor's experience (especially birdwatching). Let them stay, for now.

The preferred alternative, C, is the most ambitious and the most expensive, and its provisions reflect the tension between increased use and habitat conservation.

1. Opening the Wildlife Drive to public vehicles and increasing the number of pull-outs. We support this proposed action, as it would give wildlife watchers and photographers more access to some of the remoter parts of the Refuge. The road should be kept as a one-way route, similar to patterns of public use in many other

**7-1.** The Service believes that alternative C can be implemented without significant degradation to wildlife habitat. However, the Service is clear that "if conflicts arise between actions proposed in this plan and our management of fish and wildlife resources, we reserve the ability to forgo actions proposed in this plan and make decisions to restrict access and public-use activities." (page xvi of the draft CCP/EIS).

**7-2.** Consistent with the Service's biological integrity policy (page 6 of the draft CCP/EIS), our Habitat Management Plan (2013a) states that we will continue to restore both prairie and riparian habitats. The HMP describes our efforts to restore native prairie, which will be more extensive in the northern 12,000+ acres of the refuge. Within the Environmental Education Area, much of what you describe will be possible.

**7-3.** Thank you for your comment.

**7-4.** We agree. Thank you for your comment.

**7-5.** Thank you for your support of the Environmental Education Center. We will make a decision on the size and layout of the center based on need, funding, and more specific in-house planning for construction.

**7-6.** The National Wildlife Refuge System Improvement Act states that certain wildlife-dependent recreation activities, including hunting, be prioritized in our planning processes. Some staff resources will be necessary to establish a hunting program, but maintenance of this type of program will not require significant staff resources. The effects of hunting on various aspects of a species'

7-1

7-2

7-3

**Comment number**

**LETTER #7—Audubon Society of Greater Denver, page 2 of 3**

**RESPONSE**

population (e.g., population size, generation interval, genetic variability) are governed largely by the policies in force. The specific details of any future hunt program, including any required closures, will be outlined in a future Hunt Management Plan.

**7-7.** Thank you for your comment. There will be a significant initial investment associated with the reintroduction of black-footed ferrets. It is hoped that our costs will decrease over time.

**7-8.** Thank you for your comment. As a part of the planning process, we worked with the Federal Highway Administration to analyze all public and administrative roads. We agree that abandoning 14.5 miles of internal roads will reduce fragmentation and improve habitat for wildlife.

**7-9.** The Service consulted with the National Park Service's Natural Sounds and Night Skies Division, who examined a sound level model output for all three national wildlife refuges in the metropolitan area (see figure 16, page 104 of the draft CCP/EIS). This information shows that the northeast corner of the refuge is currently the "quietest" area of the refuge. "Maintaining a sense of retreat" in the midst of a highly urbanized area was a significant issue to be addressed in this plan (section 1.7). This EIS analyzed the effects of each alternative on soundscapes. Under alternative C, we will focus our attention on preserving the quietest areas of the refuge by limiting noise-producing activities. We will have limited ability to control noise from adjacent lands, but will continue to remind neighbors of noise impacts on the refuge and its wildlife resources (page 136 of the draft CCP/EIS).

National Wildlife Refuges, and habitat disturbance from the increased number of pull-outs should be kept to a minimum.

**2.** Maintaining a perimeter. Because of the urbanization of the areas around the Refuge, it's important to maintain some sort of perimeter boundary/blockade/wildlife containment structure. Our concern is that access via the new trail connections not become so easy that joy-riding, vandalism and habitat degradation become the norm.

**3.** Rebuilding the Contact Station. This is a chance to change the site of the old Officer's Club into a state-of-the-art environmental education center, if the funds are available. However, the footprint of the new building should be smaller or the same size as the old one's so that wildlife habitat isn't reduced.

**4.** Dove hunting and deer archery season. These would indeed diversify visitor opportunities and are especially targeted to young and special-needs publics, but we are wary of opening an urban wildlife refuge to hunting. Not because Audubon is against hunting per se, but because administration of hunting seasons would take away staff time that could be spent on habitat conservation and restoration and wildlife management. In short, would this be worth the staff time and effort it would take? Experience of a consumptive use of wildlife is already available, via the fishing programs, and the EIS admits that the deer archery season would not be an efficient way of regulating deer numbers.

In addition, hunting would require closure of parts of the Refuge during hunts, thus reducing the opportunities for other types of wildlife-based recreation. For these two reasons, and because of proximity to areas where people live, opening the Refuge to hunting doesn't seem like a particularly good idea.

**5.** Introduction of black-footed ferrets. This will indeed increase the work load of staff, but the educational and biological benefits seem so large that it should go ahead. It will be thrilling to be able to see this very rare, endangered species at the Arsenal.

**6.** Closing and rehabilitating roads. We strongly favor the maximum road closures of Alternative C, even though it might reduce visitor opportunities somewhat. The reduction in habitat fragmentation and increase in habitat acres would be worth it.

One particularly valuable characteristic of certain parts of the Refuge – the Bluestem trail comes to mind – is the freedom from much of the urban noise and acoustic pollution that plague the Denver area. We urge the Arsenal to maintain, as much as possible, the peace and quiet of some such areas in the Refuge (see Fig. 16, p. 106).

Alternatives B, C and D all propose methods of handling a presumed increase in the number of visitors to the Refuge. Whichever alternative is adopted, the Refuge should maintain and hopefully increase the quantity and quality of wildlife habitat, since that is what promotes visitation, education and interpretation. In general, we can endorse any

Comment  
number

LETTER #7—Audubon Society of Greater Denver, page 3 of 3

RESPONSE

of Alternatives B, C or D because they would meet the Refuge goals for wildlife and habitat conservation on the one hand, while providing plenty of opportunities for environmental education and interpretation – though C and D provide far more, and for that reason we tend to favor Alt. C.

The question is, how much visitation can the Refuge absorb without degrading its wildlife habitat and decreasing staff time for prairie restoration? Has the Service analyzed numbers to see where the cut-off point is – that is, at what visitation level does the damage to habitat and the crowding of visitors start to decrease visitor appreciation and enjoyment? If not, an estimation should be done. The other question that concerns us is how much of the described action could actually be accomplished given the Refuge's current fiscal condition. Where would the funding come from for the increases in staff and activities?

Regarding the quality and readability of the CCP/EIS, we want to thank the writers, editors and reviewers for making this a readable and interesting document, as well as including much valuable information.

This concludes our comments on the CCP. Thank you again for providing the opportunity to submit them.

Sincerely,

  
Pauline P. Reetz, Conservation Chairman  
Audubon Society of Greater Denver

**7-10.** The maximum level of visitation is currently unknown. Because of this uncertainty, the Service must monitor both species and habitat. Like our Habitat Management Plan, this plan includes the use of several key species to act as surrogates/indicators of our management and any impacts from increased visitation (page 34 of the draft CCP/EIS). This plan also includes designation of sensitive habitat areas that will be closed to all unnecessary human activities. Seasonal closures and designation of additional sensitive areas are examples of the Service's adaptive management approach.

**7-11.** This number (cut-off point) is currently unknown and there is no accepted method for determining it. The Service currently obtains assistance from its Human Dimensions Branch to design sampling efforts on the quality of visitor experience. Similar efforts could be utilized to ensure effective management of visitor opportunities.

**7-12.** The Service created alternatives we believed were economically feasible, but it is true that federal budgets vary and times have certainly been better! However, we are seeking funding from outside sources (e.g., grants from Federal Highway Administration). While we may not be fully funded immediately, it is feasible that over the 15-year lifecycle of the CCP, we will receive sufficient funding to fully implement alternative C.

7-10

7-11

7-12



Rockies and Plains Office  
 535 16th Street, Suite 310 | Denver, Colorado 80202  
[www.defenders.org](http://www.defenders.org)

June 29, 2015

Bernardo Garza and Toni Griffin  
 U.S. Fish and Wildlife Service  
 Division of Refuge Planning  
 134 Union Boulevard, Suite 300  
 Lakewood, Colorado 80228

SUBMITTED VIA EMAIL AT: [bernardo\\_garza@fws.gov](mailto:bernardo_garza@fws.gov); [toni\\_griffin@fws.gov](mailto:toni_griffin@fws.gov)

**RE: Comments regarding the Rocky Mountain Arsenal Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP)**

Dear U.S. Fish and Wildlife Service:

On behalf of our 1.2 million members and supporters nationwide, Defenders of Wildlife thanks you for the opportunity to comment on the U.S. Fish and Wildlife Service (“FWS”) Draft Comprehensive Conservation Plan and Environmental Impact Statement (“CCP”) for the Rocky Mountain Arsenal (“Arsenal”). Founded in 1947, Defenders of Wildlife is a nonprofit organization dedicated to the protection and restoration of wildlife and plants in their natural communities. Defenders’ distinguished record of leadership on America’s conservation efforts includes helping secure final passage of the Endangered Species Act in 1973. Defenders has a long and extensive history in the black-footed ferret program, including membership in the Executive Committee of the Black-footed Ferret Recovery Implementation Team (BFFRIT) and the Black-footed Ferret Conservation Subcommittee of BFFRIT, and has worked to promote ferret recovery at all levels of the program dating to before the rediscovery of ferrets at Meeteetse, Wyoming, including assisting recovery sites in Montana, Wyoming, South Dakota, Kansas, and Colorado. Defenders also has a long history of support for the National Wildlife Refuge System, most recently testifying to secure better transparency for Refuge managers regarding oil and gas development on the nation’s refuges.

Defenders writes primarily to support the Arsenal’s proposal to reintroduce endangered black-footed ferrets to the Arsenal under a 10(a) permit. Ferrets are in desperate need of reintroduction sites and the FWS has identified lack of habitat as one of the primary threats facing ferrets (FWS 2013a). The Arsenal proposes to maintain a minimum of approximately 2,500 acres of prairie dogs to support this reintroduction. While Defenders would prefer the Arsenal to maintain the maximum area of prairie dogs possible without compromising other refuge resource values, and hopes that over time the Arsenal will maximize its prairie dog ecosystem footprint to accommodate as many ferrets as possible, we nonetheless feel that the Arsenal will provide an additional opportunity to expand the recovery for ferrets at this time.

Defenders also supports the Arsenal’s goals of engaging as many of the public and interested parties as possible in ferret restoration efforts. We believe this will ultimately grow an informed and active constituency for ferret conservation efforts as well as greater knowledge and appreciation for the

**8-1.** Thank you for your comment.

**8-2.** Thank you for your comment. In total, the refuge manages 15,988 acres, with 2,585 of those acres in prairie dog management zones. Prairie dogs are currently dispersed entirely across all management zones. In 2014, refuge staff conducted an inventory of prairie dog densities within the management zones. The total prairie dog population of all management zones average 19.16 prairie dogs/acre. To determine if these zones are suitable habitat for reintroduction of the black-footed ferret, we incorporated the transect data into a spreadsheet provided by Dr. Biggins of the USGS. All prairie dog management zones exceeded the minimum requirements for good habitat of 4.85 prairie dogs/acre.

**8-1**

**8-2**

**8-3**

Comment  
number

## LETTER #8—Defenders of Wildlife, page 2 of 2

## RESPONSE

grassland ecosystems of North America. To that end, Defenders believes that either Alternatives C (the Arsenal's preferred alternative) or D would maximize the opportunities for greater public involvement in ferret reintroductions. Because Alternative D appears to provide all that Alternative C does in terms of prairie dog habitat management, and ferret reintroduction, with additional benefits with regard to public involvement and research, our preference would be to recommend the adoption of Alternative D. We have not attempted to analyze the tradeoffs with respect to other components of the plan, but if Alternative D can accomplish greater public access at seemingly lower overall budget (CCP at p. 70), we think this is a win-win. Moreover, Alternative D seems to reach out for additional partnerships in a number of areas (e.g., greater involvement with Colorado Parks and Wildlife, NGOs, and public/private partnerships) over Alternative C, which appears to rely more on activities internal to the Arsenal. In this regard, we think Alternative D will strengthen the connections with the greater Colorado community by reaching a larger network of people through the groups that the Arsenal cooperates with.

Defenders is pleased to support the Arsenal's efforts to bring the message of wildlife conservation and recovery to an urban audience. We look forward to assisting the Arsenal in any way possible in its efforts to restore grassland wildlife species, and look forward to future ferret reintroduction at the Arsenal. Thank you for the opportunity to comment and if you have additional questions, please don't hesitate to contact us.

Sincerely,



Steve Forrest  
Senior Representative  
Rockies and Plains Program

#### References cited

FWS 2013a. Recovery plan for the black-footed ferret (*Mustela nigripes*). U.S. Fish and Wildlife Service, Denver, Colorado, 130 pp. <http://www.fws.gov/mountain-prairie/species/mammals/blackfootedferret/2013DraftRevisedRecoveryPlan.pdf>

**8-3.** We believe that alternative C is appropriately more focused on making Rocky Mountain Arsenal National Wildlife Refuge the best it can be through creating and protecting a functional prairie ecosystem as well as maximizing the number of community members who would experience this and other benefits of an urban refuge without damaging the ecosystem. While Alternative D could reach a broader audience, we feel it would not focus as much on the refuge as on connections with established parks or other facilities, museums, schools, and audiences. Thus, alternative D would “dilute” focus on meeting several of our stated goals: specifically wildlife management, visitor services, communications and outreach, and infrastructure and operations. Text has been added to the CCP/EIS to help detail differences between alternatives C and D and to support our rationale for preferring C.

## Responses to Comments Made by Individuals

This section includes responses to comments made by members of the public. These are coded and shown in the table below to protect the name of the commenter.

### How To Find Responses to Your Comment

- Comments are organized by topic in table 21. Each comment has a corresponding comment code.

- Comment code numbers identified with bold text indicate that the comments are considered to be substantive and/or received a response.
- Look up the comment code for the comment of interest to find the comment and our response.

### Comments by Issue

Each comment made by an individual is recorded in the table below. Similar comments were grouped.

**Table 21. How to find responses to your comment.**

<i>Comment Code</i>	<i>Comment/Issue Description</i>
<b>Actions in Alternatives</b>	
ALT	Flesh out details of hunting
ALT	Making Lake Mary paths, parking etc. ADA compliant should be a priority
ALT	More attention and clarity regarding ADA compliance
ALT	Clarity on Legacy Loop v. Wildlife Drive
<b>Black-footed ferret questions</b>	
BFF	Viewing of black-footed ferrets
BFF	Control of BFF numbers
<b>Environmental Education</b>	
EE	Outreach to schools
<b>Land Use</b>	
LU	Details of Partner Village
LU	DIA park land adjacent to refuge
LU	SW corner of refuge parcel 10
LU	Status of cleanup
LU	Landscape-scale approach
LU	Inholdings on refuge
<b>Non-substantive comments</b>	
NS	Support one-way Wildlife Drive for access
NS	Support bison reintroduction efforts
NS	Support urban refuge idea
NS	Support of alternative C
<b>Socioeconomic</b>	
SE	Why is alternative A more expensive than alternative B
SE	Funding
SE	Need additional law enforcement
<b>Traffic</b>	
T	Traffic on Quebec
<b>Visitor Use</b>	
VU	Visitor increase numbers

**Table 21. How to find responses to your comment.**

<i>Comment Code</i>	<i>Comment/Issue Description</i>
VU	Need for fences
VU	Walking in bison area
VU	Visitation in Rocky Flats
VU	Quiet areas
VU	Fishing events named incorrectly
<b>Visitor Experience</b>	
VE	Impacts on wildlife and other visitors
VE	Control at access points
VE	Safety and protection of wildlife with current staff
VE	Impact of power lines on visitor experience
<b>Wildlife</b>	
WI	Acres of bison habitat
WI	Bird diversity, numbers
WI	Reintroduction of pronghorn
WI	Plague as a concern
WI	Prairie dogs imported to refuge
<b>Editorial</b>	
ED	Changes in maps to correctly identify Wildlife Drive and Legacy Loop
ED	Changes to text to correctly name facilities or features

**ALT—Actions in Alternatives**

**Comment:** In the hunting section (beginning page 44), it's important to mention the following: which firearms or other weapons would be allowed for each type of hunt; discuss the safety of eating deer or doves and any supporting studies; is eating these hunted animals consistent with existing land use restrictions in 1989 Federal Facility Agreement?

**Response:** We have indicated that deer hunting would be by archery only and that the Refuge would not allow any rifle hunting. Beyond this, we will determine details in a subsequent hunting plan. Please note response addressing land use restrictions in EPA questions.

**Comment:** Making all of Lake Mary paths, parking, etc. ADA compliant should be a top priority.

**Response:** While some parking and trails are accessible, we agree a top priority should be making these areas fully accessible.

**Comment:** Page 53: does “more user-friendly access” mean parking and pathways at Lake Mary will be accessible to people with disabilities? It's not clear.

**Response:** No. “User-friendly” was not meant to describe accessibility under the Americans with Disabilities Act. Currently, fee stations are not located

near proximate parking and regulations are not posted. The goal is to make the fishing experience simpler for all audiences.

**BFF—Black-Footed Ferret Management**

**Comment:** The text says reintroduction of black-footed ferrets at the refuge will provide viewing opportunities. Since the species is nocturnal, how will viewing be available?

**Response:** It is possible that the refuge would offer limited night spotlighting tours for visitors. Also, we anticipate creating a viewing area where visitors can see ferret habitat and possibly the animals themselves. As with any wildlife species, the chances of observing free-ranging ferrets will be variable. However, the ferret exhibit would provide much better opportunities for the public to see these animals in a controlled setting.

**Comment:** Is controlling the numbers of black-footed ferrets anticipated?

**Response:** No. Overpopulation of black-footed ferrets on the refuge is not considered likely. However, relocation of wild ferrets from the refuge to other locations is likely to be undertaken.

## LU—Land Use

**Comment:** What is the concept behind Partner Village?

**Response:** The concept of Partner Village is to provide an appropriate location for facilities at our gateway entrance that supports both increased visitation and our larger conservation goals. There would be more developed facilities such as concessions or restaurants, restrooms, and so on to supply what visitors might need before entering the refuge. It is also envisioned as a conservation hub—where other State, local, or private conservation organizations could lease office space.

**Comment:** Is DIA parkland adjacent to the refuge going to be maintained as parkland?

**Response:** Mayor Hancock (Denver) has indicated that lands between the refuge and Pena Boulevard may be managed for conservation purposes. These lands are a part of the Denver International Airport and current management plans show these lands as open space. However, consistent with FAA regulations, these lands must always be retained and reserved for future airport use.

**Comment:** What is the status and preference for acquiring the section of land in the southwest corner of the refuge (section 10) where land use is labeled “not yet determined”?

**Response:** In 1969, the U.S. Army donated lands in Section 10 to the City and County of Denver for expansion of Stapleton International Airport’s runways. The deed for this agreement included language that lands not used for airport purposes would revert to Federal ownership. The Service has agreed that the FAA will be responsible for making the final decision on this matter. These lands are currently managed by the Service. If it is determined that these lands have reverted, they will be officially added to the refuge’s Environmental Education Zone.

## SE—Socioeconomic

**Comment:** Why is alternative A more expensive than alternative B?

**Response:** Under Alternative B, the refuge would operate more like its rural counterparts. This approach would include reducing Visitor Services staff (by 2 FTE) over current (that is, alternative A) levels, accounting for the reduction in overall cost of alternative B.

**Comment:** What happens if the refuge does not get the \$1.5 million to pay for implementation of the preferred alternative? What if it is not allocated?

**Response:** The Service created alternatives we believed were economically feasible, but it is true

that federal budgets vary and we may not receive all the appropriations needed to implement alternative C. However, we are seeking funding from outside sources (such as FHWA grants). While we may not be fully funded immediately, it is feasible that over the 15-year lifecycle of the CCP, we will receive sufficient funding to fully implement alternative C.

**Comment:** With the addition of more access points to the refuge, a potential new hunting program, other new additional allowable uses of the refuge, the potential of the expansion of access to other parts of the refuge via the Wildlife Drive, in addition to the present activities handled by the Refuge Officer, there are way too many responsibilities for one Refuge Officer to handle at an urban refuge that will be getting much more additional visitation and activities. An additional officer should be a very high priority for this refuge and should be included in the CCP Personnel table.

**Response:** After careful consideration, we agree that one additional officer would not be adequate to fully ensure visitor safety and wildlife protection, and so have modified our economic analysis (section 4.9), personnel estimates (table 7), and costs for alternative C (table 20) to add two new officers (for a total of three officers).

## T—Traffic

**Comment:** Will traffic be backed up on Quebec as visitation increases at the refuge?

**Response:** The planning team included transportation engineers and city planners from the City of Commerce City, the City and County of Denver, and FHWA. Traffic models for Quebec Street (as well as Highway 2, 56th Avenue, and 96th Avenue) include increased visitation to the refuge.

## VU—Visitor Use

**Comment:** Why do visitor numbers increase so much more under alternative C than D?

**Response:** Visitor projections are included in appendix D. We believe visitation increases under alternative D would be similar to those under alternative B (4% annually) and much less than under alternative C. This is primarily because alternative D would focus on offsite visitor opportunities to a greater degree than alternative C. These projections show that visitation under alternative D would be approximately 600,000, while it would be approximately 1,000,000 under alternative C.

**Comment:** If development outside the refuge boundary continues and moves right up to the property line, how will protection of wildlife continue without an ugly permanent fence?

**Response:** The Service will not remove its perimeter fence (see section 3.9, page 69 of draft CCP/EIS). The movement of large animals such as bison and deer onto neighboring high-speed roads or into residential, urban, and airport environments could be very dangerous to humans and animals alike. We do plan to realign the fence and to use more aesthetic materials. The fence along 96th Avenue is an example of one area that is both protective of wildlife and more aesthetic, because much of the fence is hidden by vegetation.

**Comment:** Will visitors be able to walk in the bison area?

**Response:** Under alternative C, there will be 37 miles of hiking trails. No hiking trails will be constructed in areas with bison. The potential risk of death or serious injury from a bison can be mitigated by staying within a vehicle, and trails in these areas are not considered necessary.

**Comment:** When will visitation at Rocky Flats begin?

**Response:** Rocky Flats National Wildlife Refuge is covered by its own CCP (completed in 2005). Public visitation is fully described in this plan. Public tours have begun in 2015 and public opportunities will increase with funding.

**Comment:** Please be sure to preserve areas where we can get away from the city and have a quiet and solitary experience.

**Response:** “Maintaining a sense of retreat” in the midst of a highly urbanized area was a significant issue to be addressed in this plan (section 1.7). This plan considered and analyzed the effects of each alternative on soundscapes. Under alternative C, we will focus our attention on preserving the quietest areas of the refuge by limiting noise-producing activities. We have limited ability to control noise from adjacent lands, but will continue to remind neighbors of noise impacts on the refuge and its wildlife resources (page 136).

## VE—Visitor Experience

**Comment:** I am concerned about the effects of increased visitation on the visitor experience and wildlife for those seeking a less congested visit (for example, traffic).

**Response:** We share your concern and the planning team included FHWA staff to assist with transportation planning. The current alternatives include several measures to smooth out traffic flow. For example, alternative C includes opening the Wildlife Drive, now used only for tours by buses or shuttles to cars, but only in one direction. This would allow cars to stop in one lane to view wildlife while others could

pass. The plan will be reviewed periodically. If conflicts arise between actions proposed in this plan and our management of fish and wildlife resources, we reserve the ability to forgo actions proposed and make decisions to restrict access and public use activities (page xvi).

**Comment:** Although it is a positive to have more connections and access points, how would you keep the wildlife in and invasive species out now that it's more permeable? Will there be double gates?

**Response:** The design of gates at new access points has yet to be finalized, but will be undertaken with consideration of how best to keep wildlife contained. No gate will keep invasive plant species out, but larger nonnative animals (such as dogs) will not be able to incidentally pass into the refuge through gates.

**Comment:** Given anticipated visitor increase, who's going to handle law enforcement? I support maintaining just one vehicular entrance and this will help the refuge ensure safety.

**Response:** The refuge has concurrent jurisdiction, meaning that both the Service and local Adams County law enforcement agencies may enforce rules. Currently, one federal wildlife officer is assigned to the three Denver Metropolitan national wildlife refuges. Alternative C will increase the number of federal officers over time. Protecting people and keeping wildlife safe are priorities on the refuge. We also agree that maintaining a single vehicle entrance is essential to reducing the potential for the refuge being utilized as a cut-through for traffic.

**Comment:** The plan/EIS does not include any option or discussion for removing power lines, but it should. Are there impacts from the lines to visitors (viewing) or wildlife? Could Xcel expand the number of lines through the refuge? Is there an option of moving them below ground or outside the refuge? When the right-of-way was sold, where did the money go? Did it go to fund the refuge and could it be used to mitigate the refuge?

**Response:** This plan will not address the large overhead power lines at the refuge (see section 1.8). These lines were installed in 1947 to support the U.S. Army's operations and are located on a no cost easement that will not expire until 2047. Burying these power lines would be very expensive and the Service does not consider the added cost to be economically feasible. We would support re-routing these lines, but that decision rests with Xcel Energy. We agree these power lines affect both wildlife and the visitor viewing experience. Additional text has been added to the cumulative impact section of the EIS.

**WI—Wildlife**

**Comment:** How many acres of new bison habitat would be created and how was this determined?

**Response:** The refuge's HMP includes a detailed forage allocation model similar to that used in Theodore Roosevelt National Park to determine the ecological carrying capacity for bison, white-tailed deer, mule deer, and prairie dogs. Bison currently range on approximately 2,370 acres. As more infrastructure is constructed, approximately 12,165 acres will eventually be available for bison grazing. Please see appendix H of the HMP, which has additional information on the model.

**Comment:** What have the bird species numbers been since 1992 and how will implementing the plan affect them?

**Response:** The number of bird species is anticipated to decrease as restoration of short- and mixed-grass prairie habitat is implemented. Eliminating nonnative habitat will decrease habitat diversity. The numbers of other animals will also decrease. For example, there were approximately 1,200 deer in 1992; the current estimated deer population of 280 is in better ecological balance with the rest of the system. As restoration continues, some species will increase in number and in some specific habitat types (such as riparian corridors).

**Comment:** People want to see diversity at the refuge. If grassland bird numbers decrease, there may be fewer visitors.

**Response:** Service policy is to restore native species and natural habitat. Even though the refuge's reservoirs are not natural, the decision was made to keep these features because they provide important wildlife habitat in the metropolitan area. Other habitat, especially riparian corridors, prairie, woodlands, and wetlands, is natural at the refuge and would be restored. Please see the refuge's HMP for additional information on these decisions.

**Comment:** Is plague a concern at the refuge?

**Response:** Yes. The bacterium (*Yersinia pestis*) that causes plague has persisted throughout the ages but is relatively new to North America. In the past, plague has affected prairie dog colonies on the refuge. Currently, the Service conducts plague management activities to reduce the disease's primary vector of transmission (fleas). Seery et al. (2003) discussed a plague event that caused high mortality of prairie dogs in some untreated colonies on the refuge but did not appear to affect nearby colonies where plague management was undertaken.

**Comment:** Can prairie dogs from other locations be accepted at the refuge?

**Response:** If needed, and in keeping with State and local regulations, the refuge may accept prairie dogs from other locations.

## 5.8 Changes to the Proposed Action and EIS

In response to public comments on the draft CCP/EIS, we made several changes to the proposed action, none of which is significant. Alternative C—the proposed action in the draft CCP/EIS—was also designated by the team as the preferred alternative. Barring any substantive and significant comments on the final EIS, this alternative will be selected for implementation. As a result of public comments and our own reconsideration of alternative C, we made the following changes:

- Originally, alternative C would have resulted only in exterior renovation of the Egli House. Now, it will entail interior restoration as well.
- The roads leading to the gates at the south and west entrances to the refuge are now used primarily by staff for entry and exit. Under alternative C, use of these gates will be phased out over time. The roads may be maintained to provide emergency access.
- We chose to eliminate bison roundup viewing stands from consideration, as any view of bison from the stands would be blocked by the walls of the roundup facility itself.
- More than one commenter noted that one law enforcement officer (current conditions) would be inadequate to patrol the refuge if visitation were to increase substantially as predicted under alternative C. In addition, the preferred alternative includes creating several new access points, increasing the extent of area that law enforcement officers would have to monitor to ensure protection of visitors, property, and wildlife. Two additional officers (for a total of three) were added to alternative C.
- Public comments and in-house concern over the logistics of a shotgun hunt for doves also made us reconsider whether this is feasible.

Although the CCP will include the possibility of a dove hunt, we believe we need additional study and greater detail before such a hunt could be implemented.

We also added information and clarified some aspects of the alternatives and impacts. We added information about Partner Village, a concept included in alternatives C and D. We added more detail on how each alternative met our stated goals and on why alternative C is our preferred alternative. We clarified that the introduction of native species such as sage grouse, prairie chicken, and pronghorn would more deeply investigated to ensure that it is technically and otherwise feasible at the refuge. A few agency commenters pointed out that consumption of hunted animals is not something the Federal Facility Agreement for the refuge allows. We clarified our agreement with this point and added that we would need to develop an appropriate process for changing this piece of the agreement before implementing any hunting program.

## 5.9 List of Recipients Receiving the Draft CCP and EIS

### Federal Elected Officials

Michael Bennet (Senator)  
Cory Gardner (Senator)  
Ed Perlmutter (Representative—7th District)  
Diana DeGette (Representative—1st District)  
Jared Polis (Representative—2nd District)

### Federal Agencies

FAA  
Martin Hestmark (EPA)  
Greg Hargreaves (EPA)  
Elijah Henley (FHWA)  
Charlie Scharmann (U.S. Army)  
Wes Erickson (U.S. Army)  
Sherry Skipper (U.S. Fish and Wildlife Service)  
Laurie Miskimins (U.S. Department of Transportation)  
Kendra Cross (USDA)  
Patsy McEntee (NPS)

### Native American Tribes

Jim Shakespeare (Northern Arapaho Tribe)  
John Robinson (Northern Cheyenne Tribe)  
William Walks Along (Northern Cheyenne Tribe)  
Jimmy Newton (Southern Ute Indian Tribe)  
Steve Whiteman (Southern Ute Indian Tribe)  
Gary Hayes (Ute Mountain Ute Tribe)  
George Wells, Jr. (Ute Mountain Ute Tribe)

### Colorado Elected Officials

Jessie Ulibarri (State Senator—District 21)  
Dominick Moreno (State Representative—District 32)

### Colorado State Agencies

Bob Broscheid (Colorado Parks and Wildlife)  
Crystal Chick (Colorado Parks and Wildlife)  
Vicki Vargas Madrid (Colorado Parks and Wildlife)  
Scott Babcock (Colorado Parks and Wildlife)  
Gary Baughman (CDPHE)  
Susan Newton (CDPHE)  
Sarah Gallup (CDPHE)

### Local Government

Sean Ford (City of Commerce City)  
James Hayes (City of Commerce City)  
Mike Brown (City of Commerce City)  
Rene Bullock (City of Commerce City)  
Carolyn Keith (City of Commerce City)  
Rick Teter (City of Commerce City)  
Lysa Gallegos (City of Commerce City)  
Traci Ferguson (City of Commerce City)  
Rick Anderson (Adams County)  
Heather McDermott (Adams County)  
Jeanne Shreve (Adams County)  
Abel Montoya (Adams County)  
Ronald Pena (Adams County, SAC Fire)  
James Jones (Adams County, SACWSD)  
Larry Quintana (Adams County, School District 14)  
Kandy Steel (Adams County, School District 14)  
Dr. Robyn Duran (Adams County, School District 14)  
Gianni Thompson (Adams City High School)

Chris Herndon (City and County of Denver)  
 Jay Henke (City and County of Denver)  
 Jess Ortiz (City and County of Denver, Public Works)  
 Scott Gilmore (City and County of Denver, Parks and Recreation)  
 Kelly Uhing (City and County of Denver, Parks and Recreation Natural Areas)  
 Damian Higham (City and County of Denver, Denver Water)  
 Kenneth Conright (TCHD)  
 Courtney Tomlin (TCHD)  
 David Mallory (UDFCD)  
 Brandon Howes (DIA)  
 Jeannette Stoufer (DIA)  
 Mark Kunugi (DIA)  
 Scott Morrissey (DIA)  
 Stapleton Development Corporation

## Public Libraries

Brighton Branch Library  
 Commerce City Branch Library  
 State Library  
 Montbello Branch Library  
 Denver Public Library

## Organizations

Carolyn Boller (Friends of the Front Range Wildlife Refuges)  
 Norma Portnoy (Kids First Program in association with Adams County, School District 14)  
 National Wildlife Federation  
 Audubon Society  
 Rocky Mountain Greenway Steering Committee (15 copies)  
 Stapleton Citizens' Advisory Board (25 copies)

## 5.10 List of Preparers and Contributors

This document is the result of extensive and enthusiastic collaboration among members of the planning team, which includes refuge staff and other U.S. Fish and Wildlife Service employees as well as several contributors from our cooperating agencies and other organizations.

We are very grateful to all who have participated in the preparation of this plan, especially our cooperative agencies who attended planning team meetings; helped identify issues; provided input on alternative approaches, objectives, and strategies; helped us assess the environmental consequences of alternatives; reviewed draft planning documents; and provided extensive support and information throughout the planning process.

**Table 22. Core planning team.**

<i>Name</i>	<i>Agency and/or position</i>	<i>Contributions</i>
Jenny Axmacher	City of Commerce City, City Planner	Assistance with development of vision, goals, alternatives, and environmental consequences
Barbara Boyle	U.S. Fish and Wildlife Service, National Wildlife Refuge System, Region 6, Refuge Supervisor	Planning overview and assistance in developing vision, goals, and alternatives
Thomas Butts	Tri-County Health Department, Acting Deputy Director	Assistance with development of vision, goals, alternatives, and environmental consequences
Chris Cramer	City of Commerce City, Community Development, Director	Assistance with development of vision, goals, alternatives, and environmental consequences
Kendra Cross	U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services	Assistance with development of vision, goals, alternatives, and environmental consequences
Traci Ferguson	City of Commerce City, Parks and Recreation, Parks Planner	Assistance with development of vision, goals, alternatives, and environmental consequences

**Table 22. Core planning team.**

<i>Name</i>	<i>Agency and/or position</i>	<i>Contributions</i>
Bernardo Garza	U.S. Fish and Wildlife Service, Division of Biological Resources, Branch of Planning, Planning Team Leader	Lead planner; plan and planning team coordinator; and plan organization, writing, and review
Scott Gilmore	City and County of Denver, Parks and Recreation, Deputy of Parks and Planning	Assistance with development of vision, goals, alternatives, and environmental consequences
Toni Griffin	U.S. Fish and Wildlife Service, Division of Biological Resources, Branch of Planning, Acting Branch Chief	Lead planner; plan and planning team coordinator; and plan organization, writing, and review
Bruce Hastings	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal NWR, Deputy Project Leader	Planning coordination, organization, analysis, writing, and review
Jay Henke	City and County of Denver, Parks and Recreation, Senior Landscape Architect	Assistance with development of vision, goals, alternatives, and environmental consequences
Elijah Henley	U.S. Department of Transportation, Federal Highway Administration, Central Federal Lands Highway Division, Federal Highway Administrator	Assistance with analysis and development of access and transportation alternatives and environmental consequences
Mindy Hetrick	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Wildlife Biologist	Planning development, analysis, writing, and review
Levi Hodson	U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services, Wildlife Biologist	Assistance with development of vision, goals, alternatives, and environmental consequences
Brandon Howes	Denver International Airport, Planning and Environmental Services, Senior Landside Planner	Assistance with development of vision, goals, alternatives, and environmental consequences
John Hughes	U.S. Fish and Wildlife Service, National Black-Footed Ferret Conservation Center, Wildlife Biologist	Assistance with and consultation on the reintroduction of the black-footed ferret
Nick Kaczor	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Assistant Refuge Manager	Planning development, analysis, writing, and review
Melanie Kaknes	Colorado Parks and Wildlife, District Wildlife Manager—Sedalia	Assistance with development of vision, goals, alternatives, and environmental consequences
Edward (Mark) Kalitowski	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Cartography and GIS	GIS analysis and mapping for public meetings and the plan, planning development, analysis, writing, and review
Carolyn Keith	City of Commerce City, Parks and Recreation, Director	Assistance with development of vision, goals, alternatives, and environmental consequences
Mark Kunugi	Denver International Airport, Environmental Services, Environmental Public Health Manager	Assistance with development of vision, goals, alternatives, and environmental consequences
Susan Linner	U.S. Fish and Wildlife Service, Ecological Services Colorado Field Office, former Field Supervisor	Assistance with and consultation on the reintroduction of the black-footed ferret
David Lucas	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Project Leader	Overall planning coordination, organization, analysis, writing, and review
Morgan Malley	U.S. Department of Transportation, Federal Highway Administration, Central Federal Lands Highway Division, Transportation Planner	Assistance with analysis and development of access and transportation alternatives and environmental consequences

**Table 22. Core planning team.**

<i>Name</i>	<i>Agency and/or position</i>	<i>Contributions</i>
David Mallory	Urban Drainage and Flood Control District, Program Manager	Assistance with development of vision, goals, alternatives, and environmental consequences
Melodie Mascarenaz	Tri-County Health Department, Rocky Mountain Arsenal Field Supervisor and former Office Director	Assistance with development of vision, goals, alternatives, and environmental consequences
Shannon McDowell	Adams County, Parks and Community Resources, Open Space Program Manager	Assistance with development of vision, goals, alternatives and environmental consequences
Patsy McEntee	National Park Service, Rivers, Trails and Conservation Assistance Program, Landscape Architect	Assistance with alternatives development, mapping, and workshop coordination
Laurie Miskimins	U.S. Department of Transportation, Federal Highway Administration, Central Federal Lands Highway Division, Transportation Planner	Assistance with analysis and development of access and transportation alternatives and environmental consequences
Scott Morrissey	Denver International Airport, Environmental Services, Director of Environmental Programs	Assistance with development of vision, goals, alternatives, and environmental consequences
Jess Ortiz	City and County of Denver, Denver Public Works Department, Senior Engineer and Project Manager for Capital Projects Management	Assistance with development of vision, goals, alternatives, and environmental consequences
Tom Ronning	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Wildlife Refuge Specialist	Planning coordination, organization, analysis, writing, and review
Cindy Souders	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Supervisory Park Ranger	Planning coordination, organization, analysis, writing, and review
Christopher Spivey	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Federal Wildlife Officer	Planning coordination, organization, analysis, writing, and review
Jeannette Hillaire-Stoufer	Denver International Airport, Planning and Development, Acting Director of Planning	Assistance with development of vision, goals, alternatives, and environmental consequences
Kelly Uhing	City and County of Denver, Parks and Recreation, Natural Areas Program, City Naturalist	Assistance with development of vision, goals, alternatives, and environmental consequences
Rachelle Urso	City of Commerce City, Public Works and Engineering, Development Engineer	Assistance with development of vision, goals, alternatives, and environmental consequences
Sandy Vana-Miller	U.S. Fish and Wildlife Service, Ecological Services Colorado Field Office, Wildlife Biologist—Platte River Recovery Program	Assistance with and consultation on the reintroduction of the black-footed ferret
Vicki Vargas-Madrid	Colorado Parks and Wildlife, District Wildlife Manager	Assistance with development of vision, goals, alternatives, and environmental consequences
Mitchel Werner	(Former) U.S. Fish and Wildlife Service, Division of Biological Resources, Branch of Planning, Writer and Editor	Review, editing, and document layout
Scott Whiteaker	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge, Wildlife Refuge Specialist	Planning coordination, organization, analysis, writing, and review

**Table 23. Other contributors and reviewers.**

<i>Name</i>	<i>Agency and/or position</i>	<i>Contributions</i>
Crystal Chick	Colorado Parks and Wildlife, District Wildlife Manager—Denver	Document review
Catherine Cullinane Thomas	U.S. Geological Survey, Fort Collins Science Center, Policy Analysis and Science Assistance Branch, Economist	Regional economic profile, analysis of socioeconomic impacts
Susan Drobniak	U.S. Fish and Wildlife Service, Rocky Mountain Arsenal National Wildlife Refuge	Assistance with overview of visitor services
Diane Emmons	U.S. Fish and Wildlife Service, National Wildlife Refuge System, Region 6, Division of Education and Visitor Services, Chief	Assistance with overview of visitor services
Wes Erickson	U.S. Army, Rocky Mountain Arsenal	Document review
Pete Gober	U.S. Fish and Wildlife Service, National Black-Footed Ferret Conservation Center, Recovery Coordinator	Assistance with and consultation on the reintroduction of the black-footed ferret
Joelle Greenland	Adams County, Parks and Community Resources, Long Range Planning	Document review
Damian Highmam	Denver Water, Recycled Water Section	Document review
Christopher Huber	U.S. Geological Survey, Fort Collins Science Center, Policy Analysis and Science Assistance Branch, Economist	Regional economic profile, analysis of socioeconomic impacts
Tina Jackson	Colorado Parks and Wildlife	Document review
Julie Lyke	U.S. Fish and Wildlife Service, National Black-Footed Ferret Conservation Center, Deputy Recovery Coordinator	Assistance with and consultation on the reintroduction of the black-footed ferret
Heather McDermott	Adams County, Parks and Community Resources, Emergency Management	Document review
Holly Miller	U.S. Geological Survey, Fort Collins Science Center, Policy Analysis and Science Assistance Branch, Social Scientist	Regional economic profile, analysis of socioeconomic impacts
Ken Morgan	Colorado Parks and Wildlife	Document review
Leslie Richardson	U.S. Geological Survey, Fort Collins Science Center, Policy Analysis and Science Assistance Branch	Regional economic profile, analysis of socioeconomic impacts
Charles Scharmann	U.S. Army, Rocky Mountain Arsenal, Program Manager	Document review
Rudy Schuster	U.S. Geological Survey, Fort Collins Science Center, Policy Analysis and Science Assistance Branch, Chief and Social Scientist	Regional economic profile, analysis of socioeconomic impacts
Earlene Swann	U.S. Geological Survey, Fort Collins Science Center, Policy Analysis and Science Assistance Branch, Social Scientist	Regional economic profile, analysis of socioeconomic impacts
Craig Tessmer	Adams County, Parks and Community Resources, Environmental Services	Document review
Melvie Uhland	U.S. Fish and Wildlife Service, National Wildlife Refuge System, Region 6, Division of Education and Visitor Services, Outdoor Recreation Planner	Assistance with overview of visitor services

**Table 24. Consultants.**

<i>Name</i>	<i>Agency and/or position</i>	<i>Contributions</i>
Mimi Mather	Root House Studio, Principal	Facilitation of planning team and public meetings; development of visual and printed resources
Heidi West	Total Quality NEPA, Principal	Assistance with NEPA procedures, analysis, environmental consequences, workshops, and other NEPA issues and documentation