

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:17-cv-01210-WYD

ROCKY MOUNTAIN PEACE & JUSTICE CENTER; CANDELAS GLOWS/ROCKY FLATS GLOWS; ROCKY FLATS RIGHT TO KNOW; ROCKY FLATS NEIGHBORHOOD ASSOCIATION; and ENVIRONMENTAL INFORMATION NETWORK (EIN) INC.,

Plaintiffs,

v.

UNITED STATES FISH AND WILDLIFE SERVICE;  
RYAN ZINKE, in his official capacity as Secretary of the Interior; and  
JAMES KURTH, in his official capacity as Acting Director of the United States Fish and Wildlife Service,

Defendants.

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**BONNIE GRAHAM-REED'S DECLARATION IN SUPPORT OF  
MOTION FOR PRELIMINARY INJUNCTION**

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I, Bonnie Graham-Reed, declare that:

1. I am over eighteen years old, and I am a member of the Rocky Flats Right to Know, a plaintiff in this action. I make this declaration in support of Plaintiffs' motion for a preliminary injunction filed pursuant to Fed. R. Civ. P. 65(a).
2. I am submitting this declaration to demonstrate my standing to bring this lawsuit and to show that I and my organization will be irreparably harmed by Defendants' commencement of construction of the Trails and Multi-purpose Facility at Rocky Flats National Wildlife Refuge (the "Refuge").
3. I have personal knowledge of the facts stated in this declaration, and, if called as witness, I could testify competently to them.
4. I have lived near in Arvada, downwind from the Rocky Flats site, since June, 1977. My late spouse and I purchased this home without any knowledge or disclosure of the presence of the Rocky Flats Plant only a short distance away.
5. In approximately 1980, I became concerned in a general way about the existence of the facility and the threat it posed to me and my family. I especially started taking notice of the contamination when I watched the documentary "Dark Circle," the opening scenes of which actually start on the corner of my block.

6. In 2012, I knew I had to act about the situation at Rocky Flats after reading Kristen Iversen's book, *Full Body Burden*. This highly influential book impressed upon me the need to help others become aware of the danger lurking a short distance away.
7. In 2016, I co-founded Rocky Flats Right to Know with Marian Whitney. The mission of Rocky Flats Right to Know is to provide members of the public with accurate and complete information about the history and status of the Rocky Flats site so they can make informed decisions about the risks they take based on where they chose to live, work, shop and recreate. We also seek to teach members of the public methods by which they can actually protect themselves and their families from harm from the contaminants they are exposed to coming from the site.
8. In June 2016 Rocky Flats Right to Know started hosting monthly community education meetings in Arvada featuring expert guest speakers, including grand jury foreman and author Wes McKinley.
9. I quickly learned that government officials at all levels, including within the City of Arvada, the State of Colorado and federal agencies were in denial of the facts and the threats posed by the contaminants remaining at the site.
10. I have been an active public participant when various Federal Agencies sought input on issues related to Rocky Flats. I have offered comments regarding the status and use of the Refuge.
  - a. I have attended two (2) of the four (4) "Sharing Sessions" regarding the Refuge held by the US Fish and Wildlife Service ("FWS");
  - b. I have raised issues and provided comments at multiple meetings of the Rocky Flats Stewardship Council involving the Refuge.
11. I have been interviewed by local journalists regarding the efforts my organization has made to educate and protect the public from the threats posed by the Rocky Flats site.
12. I am extremely concerned that the FWS will start construction of the Trails and Multipurpose Facility in areas where plutonium hot-spots were not discovered during the previous remediation at Rocky Flats. Moreover,
  - a. Government officials are in denial about the dangers posed by Rocky Flats.
  - b. When these government officials make statements that the site is safe the general public trusts that they speak from a position of knowledge of all of the details.
  - c. Because the public trusts officials who tell them that the site is safe, they do not take adequate steps to protect themselves from the dangers of contaminants leaving the site.
13. If construction on the Refuge were to proceed before the proper environmental analyses, the plutonium and other hazardous substances present on the Refuge and disturbed by the

construction would harm me physically through illnesses related to exposure to these contaminants.

- a. The contaminants stirred up by the construction would threaten me and the members of my group because the contamination cannot be seen with the naked eye.
  - b. If the public is misled by government officials to believe the site is safe they will not seek information and means to protect themselves.
14. I am extremely concerned that FWS will start construction of the Trails and Multipurpose Facility without an adequate public involvement process.
- a. The FWS approach to the “Sharing Sessions” creates a David-and-Goliath situation where the efforts of my organization to educate the public are overwhelmed by the FWS efforts to silence it.

The chilling effect of FWS’ one-direction approach to public involvement in these revised plans has compromised the ability for Rocky Flats Right to Know to advocate on behalf of and educate the public.

15. I declare under penalty of perjury under the laws of the United States of America and the State of Colorado that the foregoing is true and correct and to the best of my knowledge, and that this declaration was executed on this 30<sup>th</sup> day of May, 2017.

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Bonnie Graham-Reed