

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

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; JAMES KURTH, in his official  
capacity as Acting Director of the United States  
Fish and Wildlife Service; RYAN ZINKE,  
in his official capacity as Secretary of the Interior;  
DAVID LUCAS, Project Leader, Region 6 of  
the United States Fish and Wildlife Service;

and

UNITED STATES FEDERAL HIGHWAY  
ADMINISTRATION; BRANDYE HEND-  
RICKSON, in her official capacity of Acting  
Administrator of the United States Federal  
Highway Administration; and ELAINE L.  
CHAO, in her official capacity as Secretary  
of Transportation.

Defendants.


Case No.

**DECLARATION OF  
MARK JOHNSON, MD, MPH**

I, Mark B. Johnson, MD, MPH, under penalty of perjury of the laws of the United States of America and the State of Colorado, do hereby state:

1. I am the Executive Director of Jefferson County Public Health, an agency of Jefferson County, Colorado.
2. I am not a Plaintiff in this action. However, I do have a considered position on the opening of Rocky Flats for public trails and a visitor center.

3. My position is that I do/did not trust the U.S. Department of Defense or its contractors at Rocky Flats, and while I did not necessarily mistrust the Colorado Department of Public Health and Environment and its staff, I sometimes questioned if they had the expertise necessary to make some of the decisions and statements they made.
4. I believe there was/is contamination on Rocky Flats and that some of it has escaped from Rocky Flats into the surrounding neighborhoods, but how much there is/was and what the health consequences of it are/were are not clear to me. From the evidence I have seen that I trust, I am not convinced of the disease clusters and deaths that many of the activists claim to have found.
5. However, for the most part, my sentiments are on the side of the environmentalists and activists, and I have found most of them to be much more pleasant and open to deal with than the corporate and federal players in this saga. I have met with and admire Jon Lipsky, Wes McKinley and Kristen Iversen. I have read *The Ambushed Grand Jury*, *Full Body Burden*, and *Yellow Dirt*, and I grew up in Grand Junction, and I feel that our government played fast and free with the truth in its dealings with the Native Americans and the people of the western United States in their hell-bent rush to win World War II and intimidate the world during the Cold War with our nuclear power. I also do not believe I would be here if we had not used the atomic bombs in Japan, as my father was on the ships waiting to invade Japan when the bombs fell, and the odds are he would have been killed in an invasion.
6. In summary, after all the study I have done in regard to Rocky Flats, I am still greatly conflicted. What I would love to see is a truly independent assessment of all of the studies, tests and research that has been done on Rocky Flats and its surrounding environs. As I said to Rick Sallinger, in the CBS television interview, I am skeptical enough that I would not buy a home, nor would I raise children down-wind from Rocky Flats. I also think it is unwise to build shopping centers and schools there, and to open Rocky Flats to field trips and picnics. But I honestly do not know how dangerous it is to live in its shadow. I believe we have the data to tell us the truth, but I do not believe all of it has been analyzed by truly independent sources. I wish it could be, and I have met with representatives of our Congressional delegates to ask for such a study. So far, it has not been done.

  
Mark B. Johnson, MD, MPH

April 30, 2018  
Date