



June 15, 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 at the existing contact station or 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

The City supports the plan's decision not to open additional vehicular access points to the Refuge, as referenced on page 68.

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.

The City supports the reintroduction of the Black-Footed Ferret to the refuge and appreciates the coordination with USFWS on the reintroduction plan.

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.

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.

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.

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.

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.

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.

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



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

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.

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

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.

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

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.

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.

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

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,

Sean Ford
Mayor of Commerce City

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

