

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

PHYSICIANS FOR SOCIAL RESPONSIBILITY) et al.,)) Plaintiffs,)) v.)) PETE BUTTIGIEG, in his official capacity) as Secretary of Transportation,) et al.,)) Defendants.) _____)	)	Civ No. 1:24-cv-00061-TJK
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NOTICE REGARDING COMMENCEMENT OF GROUND BREAKING ACTIVITIES

Plaintiffs respectfully notify the Court of the September 9, 2024 commencement of “ground breaking activities” for the Rocky Mountain Greenway (the “Greenway”) at the Rocky Flats National Wildlife Refuge (the “Refuge”), the predominant issue in this case, specifically construction of: (1) “abutments for the pedestrian bridges” and (2) a pedestrian underpass, both of which will enable public access to the Refuge via neighboring municipalities’ open space lands.¹ See **Exhibit 1** (email from Defendants’ counsel dated August 29, 2024); *see also* ECF No. 11-3 at 4, ¶¶ 10-11 (Declaration of Tomasz Kubicz).

Respectfully submitted,

By: /s/ William S. Eubanks II
William S. Eubanks II
EUBANKS & ASSOCIATES, PLLC
1629 K Street NW, Suite 300
Washington, DC 20006
(970) 703-6060
bill@eubankslegal.com

¹ Two of those neighboring municipalities have already withdrawn from the Greenway through the Refuge. <https://boulderweekly.com/opinion/rocky-flats-refuge-hidden-danger/> at p. 7 and **Exhibit 2**.

By: /s/ Randall M. Weiner
Randall M. Weiner
Admitted pro hac vice
Annmarie Cording
Admitted pro hac vice
WEINER & CORDING
3100 Arapahoe Avenue, Suite 202
Boulder, CO 80303
(303) 440-3321

Attorneys for Plaintiffs