

Chapter 7
ENVIRONMENTAL OVERVIEW
Colorado Springs Airport

INTRODUCTION

The following narrative presents a general overview of the environmental implications of the Recommended Development Plan (RDP) at Colorado Springs Airport (the Airport). This overview identifies environmental considerations related to the environmental resource categories assuming implementation of the RDP. Further, this overview identifies the level of environmental review (i.e., Categorical Exclusion, Environmental Assessment or Environmental Impact Statement) anticipated prior to implementation of specific projects within the RDP in an effort to identify critical resources that would need to be addressed in the eventual preparation of environmental review documentation for the RDP.

The RDP is defined in Chapter 6. The majority of the projects included in the RDP are associated with a reconfiguration of the west airfield to meet FAA standards, including the deconflicting of the Runway 13 and 17R intersection. Notably, these airfield improvements have not been proposed to accommodate future demand or larger aircraft. Key modifications include:

- a shift of Runway 17R-35L to the south;
- a shortening of Runway 13-31 on the northwest end; and
- select modifications to various taxiways

Alternatives involving the alternate airfield configurations have been considered; however, none of the alternatives would require land acquisition. A number of Airport-specific environmental studies were used to inform this overview, including the following:

- *Final Environmental Assessment - Colorado Springs Airport Instrument Landing System*; prepared by Bionomics Environmental, June 2006.
- *Colorado Springs Airport Open Space Management Plan: A Resource Management Guide*; prepared by Colorado Springs Airport, January 2007.
- *National Register of Historic Places Registration Form*; Old Colorado Springs Municipal Airport; National Park Service, 1996.
- *FAR Part 150 Study for Colorado Springs Airport*; prepared by Barnard Dunkelberg & Co., August 2001.
- *Colorado Springs Airport Business Park Supplemental Environmental Assessment: Airbus Point Realignment*; prepared by CH2MHill, May 2009.

ENVIRONMENTAL RESOURCES

The RDP will be subject to environmental review under the National Environmental Policy Act of 1969 (NEPA) and will require an FAA determination prior to implementation. Brief summaries of environmental considerations associated with implementation of the RDP for select resource categories are provided below. A qualitative assessment of these select resource categories and potential environmental consequences associated with the RDP are provided below. This assessment is based on review of FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions* to provide an overview of potential environmental consequences of the RDP and strategies for addressing them.

Air Quality

Air Quality is measured through attainment of National Ambient Air Quality Standards (NAAQS) under the Clean Air Act, which regulates several specific air pollutants, including ozone (precursors of which are oxides of nitrogen and volatile organic compounds), oxides of sulfur, particulate matter with a diameter less than 10 microns, particulate matter with a diameter less than 2.5 microns, and carbon monoxide. More specifically, impacts to air quality would be considered significant if a NAAQS for one or more of these pollutants were not attained as a result of a project, or if project related emissions exceeded a defined 100-ton per year de minimis threshold under the General Conformity rule.

The RDP would result in modest, but temporary emissions from construction equipment (see discussion of Construction Impacts below). It is not expected that the RDP would noticeably affect the operation of aircraft at the Airport, although aircraft taxi patterns and times may change during construction. The RDP is not likely to exceed any of the NAAQS since the Airport's location is in maintenance for carbon monoxide and in attainment for all other pollutants, while construction-related emissions are expected to be modest. If no NAAQS were exceeded as a result of the RDP, it would not be considered a significant air quality impact as described in Table 7-1 of FAA Order 5050.4B.

Under the General Conformity Rule, all project-related emissions would have to be estimated and compared to the 100-ton per year de minimis threshold for carbon monoxide. Although air quality mitigation measures are not likely to be required, there is the potential for short-term increases in fugitive dust emissions from construction activities; however best management practices such as watering disturbed surface areas would be implemented to minimize construction impacts. Contractors would be required to apply for any applicable air quality permits and provide mitigation measures to maintain compliance.

Construction Impacts

Construction impacts refer to temporary environmental effects that result from construction of a project, which often concern dust from earthmoving, construction equipment emissions that affect air quality, storm water runoff, and noise.

Construction impacts are considered significant when the significance threshold for an affected environmental resource is reached.

Construction for the RDP includes: (1) the removal of the northern portion of Runways 17R-35L and 13-31, which would require the removal of pavement debris and (2) the extension of the southern portion of Runway 17R-35L, which would involve earthmoving and paving activities. Typical construction equipment would include dump trucks, dozers, graders, excavators, pavers, and loaders. It is likely that ambient noise levels would modestly increase during working hours (primarily at night), but would be short in duration and temporary in nature. Noise could occur on the north end of Runway 17R-35L and Runway 13-31 where residential neighborhoods adjacent to S. Powers Boulevard are close to the edge of Airport property. This potential impact and possible mitigation measures would need to be considered in future environmental review of the RDP.

Emissions from construction activities would create a modest, but temporary, impact to the local air quality. An inventory of construction vehicle emissions would quantify the impact to local air quality. Fugitive dust would be controlled through best management practices (BMPs) during the construction process to protect air quality. Construction vehicles transporting materials to and from the vicinity of Runway 17R-35L would potentially create a modest, but temporary, impact to local traffic patterns during working hours (mostly at night).

Although the northern portion of Runway 17R-35L is currently paved, it is likely that debris removal would expose significant areas of bare soil, which could affect local water quality through erosion or storm water runoff. Extending the southern portion of Runway 17R-35L would involve significant excavating and earthmoving activities, which could also affect local water quality. Construction activities would be performed in accordance with the City of Colorado Springs Stormwater Quality Policies, Procedures, and Best Management Practices manual. However, further environmental review would need to verify that water quality standards would be met throughout the construction process, and which mitigation measures would be necessary.

Farmlands

Farmlands considered “important” for environmental review include croplands, pasturelands, and forests that have specific chemical characteristics, agricultural potential, and/or designation from relevant government authorities. Important farmland can be categorized as “prime,” “unique,” or “statewide and locally important.” Projects that impact any category of important farmland must be coordinated with the Department of Agriculture Natural Resources Conservation

Service (NRCS) Soil Survey and would be regulated under Farmland Protection Policy Act (FPPA) of 1984. This type of project would require completion of Form AD-1006, Farmland Conversion Impact Rating. An impact to farmland would be considered significant if the project's score of Form AD-1006 fell in the range between 200 and 260.

Large tracks of agricultural land are present to the east and south of the Airport in the vicinities of State Highway 94, S. Marksheffel Avenue, Drennan Road, and South Powers Boulevard. There are also smaller agricultural land parcels to the east and north of the Airport. On-Airport soil types previously identified include the Bresser and Truckton sandy loams, with 0 to 3 percent slopes.¹

Soils located on Airport property, including in the vicinity of proposed Runway 17R-35L extension, have been previously identified by the NRCS Soil Survey as having the potential to become prime farmland if they were irrigated.² In correspondence between consultants and the NRCS soil survey for the Airport's Instrument Landing System 2006 Environmental Assessment, John Valentine, District Conservationist, confirmed that soils in question would not be considered prime farmland because they do not have access to water.³

In the event that soils affected by the RDP were classified as prime or important farmland, the RDP would need to be coordinated more closely with the local NRCS field office, and it would require submission of Form AD-1006 to determine if impacts to farmland were significant.

Fish, Wildlife, and Plants

Impacts to fish, wildlife, and plants must be considered for any of these species in the vicinity of the proposed project that are listed as federally endangered or protected, as well as those that are state-listed as rare or unique. A significant impact would occur if a project jeopardized one of these species' continued existence or adversely affected its habitat. There are no surface waters in the vicinity of the RDP available to provide fish habitat, thus this discussion only includes wildlife and plants.

Bald eagles (*Haliaeetus leucocephalus*), which the Colorado Division of Wildlife designates as a "Species of Special Concern", have been found to inhabit cottonwood stands on the west side of Big Johnson Reservoir, which is located south of the Airport. They have also been observed flying over Airport property, but the on-Airport prairie ecosystem does not provide a suitable habitat for nesting, feeding,

¹ Final Environmental Assessment - Colorado Springs Airport Instrument Landing System. Prepared by Bionomics Environmental, June 2006, page 13.

² Final Environmental Assessment - Colorado Springs Airport Instrument Landing System. Prepared by Bionomics Environmental, June 2006, page 13.

³ Final Environmental Assessment - Colorado Springs Airport Instrument Landing System. Prepared by Bionomics Environmental, June 2006, Appendix.

or roosting.⁴ The bald eagle's designation of State Special Concern does not provide statutory protection, but public concern for bald eagles makes them noteworthy.

Potential sensitive species that have been observed on Airport property or have the potential to migrate onto Airport property include the Western Burrowing Owl (State threatened), Ferruginous Hawk (State Special Concern), Mountain Plover (State Special Concern), Piping Plover (Federal/State Threatened), Interior Least Tern (Federal/State Threatened), and Mexican Spotted Owl (Federal/State Threatened) and are protected by the Federal Migratory Bird Treaty Act.

The Preble's Meadow Jumping Mouse (Federal/State Threatened) has potential habitat within 300 feet of creeks. However, per the USFWS, the East Branch of Sand Creek on Airport property was not designated as critical habitat for the Mouse.

A biological assessment/bird survey would need to be performed prior to any construction activities.

The Colorado Natural Heritage Program (CNHP) classifies Colorado Springs Airport as a Potential Conservation Area, which is an estimate of the habitat needed to support the long term survival of both "significant natural communities and rare, threatened or endangered plants and animals."⁵ CNHP considers the Airport to be noteworthy because it possesses the largest known area of big bluestem - prairie sandreed (*Andropogon gerardii* - *Calamovilfa longifolia*) tall grass prairie in the state of Colorado. This tall grass prairie occurs in patches throughout El Paso County, but the most extensive community occurs in an area of approximately two square miles located between Milton E. Proby Parkway and Powers Boulevard south of the Airport. CNHP-designated rare wildlife species also found in this area include the otto skipper (*Hesperia ottoe*), dusted skipper (*Atrytonopsis hianna*), and crossline skipper (*polites origenes*) butterflies.^{6,7}

Designated Open Space parcels are present on Airport property south of Milton E. Proby Parkway. Airport management created these spaces as a mitigation measure for fish, plant, and wildlife impacts associated with the Airport Business Park development project.⁸ The provision of open space helps ensure that the Airport's outstanding mixed grass prairie, which serves as a habitat for multiple local species, would be minimally impacted by future development.

⁴ Colorado Springs Airport Open Space Management Plan: A Resource Management Guide, Prepared by Colorado Springs Airport, January 2007, page 10.

⁵ Colorado Springs Airport Open Space Management Plan: A Resource Management Guide, Prepared by Colorado Springs Airport, January 2007, page 17.

⁶ Final Environmental Assessment - Colorado Springs Airport Instrument Landing System. Prepared by Bionomics Environmental, June 2006, pages 17-18.

⁷ CNHP Conservation Status Handbook Tracking Lists, available from <http://www.cnhp.colostate.edu/download/list.asp>, accessed June 30, 2013.

⁸ Colorado Springs Airport Business Park Supplemental Environmental Assessment: Airbus Point Realignment. Prepared by CH2MHill, May 2009.

Previous environmental reviews have indicated that no endangered or threatened species dwell in the area of the RDP, and the nearest confirmed bald eagle habitat is over two miles south of the site of the proposed Runway 17R-35L extension.^{9,10} Further coordination with US Fish & Wildlife Service (F&WS) and CNHP would be conducted to update the locations of critical habitats.

Hazardous Materials, Pollution Prevention, and Solid Waste

Hazardous materials are technically defined contaminants such as industrial wastes and petroleum products that could be “capable of posing an unreasonable risk to health, safety, and property” according to FAA Order 1050.1E. Impacts related to hazardous materials are considered significant when the project involves a contaminated area that is on or is eligible for the National Priority List (NPL), which is a list of important contaminated areas maintained by the Environmental Protection Agency (EPA).

A number of sites that may potentially contain hazardous materials are located on the Airport, including: (1) several above- and below-ground liquid storage tanks; (2) fuel storage and distribution facilities; (3) the airfield maintenance facility; (4) aircraft rescue and firefighting facilities; and (5) a former military training area referred to as the Rapier Site. The Rapier Site is located south and east of the fuel farm is a former military training area used by Peterson AFB that consists of approximately 84-acres. The site was historically used as a skeet range, pistol range, ordinance storage area, lead deposit site, small arms open burn/open detonation area, disposal area, and gas instruction storage area. The site is currently undergoing remedial investigation through the United States Air Force Environmental Restoration Program, Military Munitions Response Program in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

Although the RDP is not adjacent to any areas likely to contain hazardous materials, the Airport would conduct a Phase 1 Environmental Due Diligence Audit (EDDA) to confirm the absence of hazardous materials in areas that would undergo extensive earthmoving and excavating activities. If contaminated soil is exposed or any other hazardous wastes are generated during construction, they would be disposed of in a manner that is in accordance with all applicable local, state, and federal regulations.

Debris associated with the removal of the northern portion of Runways 17R-35L and 13-31 would likely create a high volume of solid waste (discarded pavement), but it

⁹ Colorado Springs Airport Open Space Management Plan: A Resource Management Guide, Prepared by Colorado Springs Airport, January 2007.

¹⁰ Final Environmental Assessment - Colorado Springs Airport Instrument Landing System. Prepared by Bionomics Environmental, June 2006, pages 15, 17-18.

is anticipated that debris generation and transport activities would only occur on a temporary basis, likely at night, and that a portion of the debris could be recycled.

Historic, Architectural, Archeological, and Cultural Resources

Federal regulations, including the National Historic Preservation Act of 1966 and the Archeological and Historic Preservation Act of 1974, require the identification and conservation of cultural resources. Impacts to these resources are considered significant when a project adversely affects them and a State and/or Tribal Historic Preservation Officer believes the impact merits further study.

The Old Colorado Springs Municipal Airport on Peterson Air Force Base is located approximately 3,400 feet north of Runway 17R-35L. This site consists of five buildings, including the original terminal, two hangars, a former residence, and a utility/maintenance building. Because there are no other known historic sites within Airport property, it is unlikely that impacts would occur to any properties listed or eligible to be listed on the National Register. The land south of Runway 17R-35L is largely undeveloped and contains no known properties of historical significance.

In the unlikely event that any historical, architectural, cultural, or archaeological resources are discovered during the construction process, all work would cease until the Airport notifies the Colorado Office of Archaeology and Historic Preservation (OAHP) and the FAA's Airport District Office. The Airport would be required to coordinate with FAA and OAHP to preserve the area until all historical, architectural, cultural, or archaeological resource concerns have been addressed and is in compliance with all applicable local, state, and federal laws.

Light Emissions and Visual Impacts

Light emissions refer to changes in lighting patterns that could cause annoyance to stakeholders near an airport. Visual impacts refer more broadly to contrast with existing environments that could be caused by an airport project, such as obstruction of views. These impacts are considered significant when they cause annoyance that interferes with normal activities in the vicinity of the project.

Existing land uses in the vicinity of the RDP result in light emissions that are common to airport operations (runway and building lighting, navigational lighting, etc.). Runway 17R-35L is a flat, level, and paved surface used for aircraft landings and takeoffs. Shifting Runway 17R-35L and extending it southward would relocate existing navigational light emissions to the south. Shifted approach lighting to the south of Runway 17R-35L would encroach upon the Airport Open Space area, but it is not anticipated that it would disturb existing wildlife habitats or nearby residences.

Because construction activities would be phased to create the least possible impact to airport operations (e.g., at night), it is anticipated that additional light emissions

would occur, but that they would be minimal and temporary in nature. These light emissions are unlikely to create annoyance to interfere with normal activities in nearby residences or wildlife habitats.

Noise

Research has shown that noise from normal airport operations may exceed levels that make certain noise sensitive land uses, such as residences, hospitals, or churches, non-compatible with airport operations. As a result, FAA requires analysis of the effects of any airport development project that has the potential to cause aircraft noise outside an airport's boundaries. The FAA uses day night average sound level (DNL) 65 as the threshold for determining whether or not a particular function or facility type is incompatible with the noise produced by aircraft operations at an airport. Significant impacts are those that cause noise sensitive facilities and areas within the DNL 65 contour to experience a noise increase of at least DNL 1.5 dB.

Aircraft currently utilizing Runways 17R-35L and 13-31 create noise during landing, takeoff, and taxi operations. No known noise-sensitive facilities or areas are located within the existing DNL 65 affected area.

According to the Airport's 2001 Part 150 Noise Compatibility Study, the noise contours for year 2000 depict the DNL 65 contour reaching beyond the Airport boundary to the north of Runways 17R-35L and 17L-35R, to the south of Runway 17L-35R, and to the west of Runway 17R-35L.¹¹ The noise exposure for normal aircraft operations would shift to the south as a result of the RDP, but the exact extent of the exposure depends on fleet mix as well as runway location, and future environmental review would be needed to determine changes in noise exposure. The Airport intends to evaluate noise impacts as a component of an Environmental Assessment for the runway improvement project. Future environmental review would also need to provide special consideration for any changes in noise exposure over the Old Colorado Springs Municipal Airport on Peterson Air Force Base, since it appears on the National Register of Historic Places.

Construction of the extended Runway 35L to the south and shortened Runway 17R to the north would create additional, temporary changes in noise exposure at night during construction. Construction vehicles used for removing runway debris from the Airport would likely operate at night along local roads, which may cause moderate, but temporary noise impacts to surrounding neighborhoods.

Secondary (Induced) Impacts

Secondary or induced impacts refer to impacts on a particular resource when the cumulative result of impacts on that resource occurs due to past, present, and reasonably foreseeable actions within a defined time and geographical area.

¹¹ FAR Part 150 Study for Colorado Springs Airport. Prepared by Barnard Dunkelberg & Co., August 2001.

Cumulative impacts are significant when they meet significance thresholds established for the environmental resources affected.

Secondary impacts are not expected to occur as a result of the RDP, except for minor changes to traffic during RDP construction. Local traffic patterns include Aviation Way to the immediate west of Runway 17R-35L and South Powers Boulevard to the west and south of the Airport. Other major roads on and around the Airport include Milton E Proby Parkway, Air Cargo Road, Langley Street, Airport Road and Drennan Road. Milton E Proby Parkway provides the main passenger entrance to the Airport.

Construction activities and debris removal would temporarily impact local traffic patterns, specifically South Powers Boulevard and Milton E Proby Parkway to the west of the Airport. Impacts to each of these roads could be limited by the implementation of a nighttime construction schedule.

Water Quality

Water quality is defined in the Clean Water Act and measured according to water quality standards. Significant impacts are those that cause water quality standards to be exceeded, often through sediment-laden runoff from construction.

The Airport is located within the boundary of the Laramie-Fox Hills aquifer, one of four aquifers included in the Denver Basin Aquifer system. There are riverine wetlands to the west and northeast of the Airport, and the wetland located to the west is adjacent to the Airport property line. The Airport is not located in the vicinity of a sole source aquifer.

The patterns of storm water runoff would change as a result of the RDP, thus possibly increasing pollutant and sediment loading in the vicinity of Runway 17R-35L. However, as part of the RDP, the Airport would make drainage improvements as part of implementation. These improvements are described in Appendix G.

Standard design and operational measures would be implemented via a Stormwater Management Plan (SWMP) during construction, which would adequately prevent or mitigate any potential impacts. The Airport would adhere to all state and local requirements associated with the implementation of best management practices to minimize potential impacts to the local water quality.

Wetlands

Wetlands are environmental resources subject to review under NEPA and the Clean Water Act. Significant impacts to wetlands include adversely affecting wetland functions, substantially changing the hydrology of wetlands, reducing a wetland's ability to contain water, or adversely affecting natural resources, such as wildlife, fish, or timber, that are associated with a wetland.

The US Army Corps of Engineers determined that the East Fork of Sand Creek that crosses the northwest corner of Airport property to be navigable waters of the U.S. and protected under Section 404 of the Clean Water Act. Coordination with the US Army Corps of Engineers and a Section 404 permit would be required if any construction activities impact East Fork Sand Creek on Airport property.

Compatible Land Use

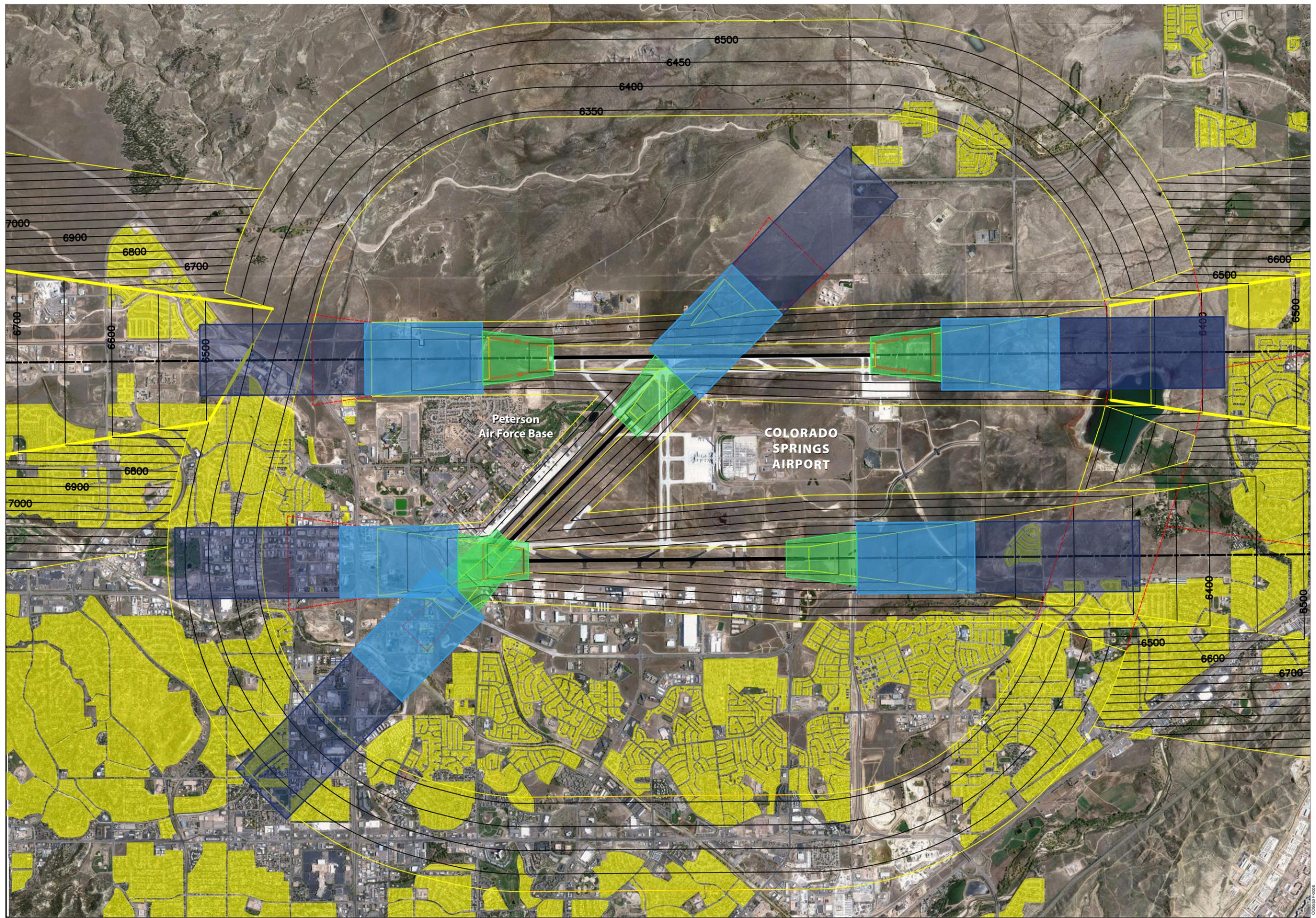
It is unlikely that changes in noise contours resulting from the RDP would noticeably impact communities, businesses, wetlands, or critical habitats. Additionally, the RDP is commensurate with surrounding land uses and would occur entirely on Airport property.

However, the Airport's Commercial Airport Overlay Districts would be modified to encompass the areas shown in Figure 7-1. These modifications result from the proposed shifting and extension of Runway 17R-35L and the shortening of Runway 13-31 as described in Chapter 6. Accordingly, the FAR Part 77 imaginary surfaces will be shifted, along with the Runway Protection Zones (RPZ) and Accident Potential Zones 1 and 2, as shown on Figure 7-1. For further description of the Commercial Airport Overlay Districts, see Chapter 2.

Resources Unaffected by the Proposed Improvements

The following environmental resource categories, as outlined in FAA Order 1050.1E, are not considered to be part of the affected environment:

- **Coastal Resources** – there are no coastal zones or coastal barriers located in the vicinity of the Airport.
- **Department of Transportation Act: Section 4(f)** – the RDP would not require the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge, or land of a historic site that is of national, state or local significance.
- **Floodplains** – there are no 100-year or 500-year floodplains located in the vicinity of the RDP, so no floodplain encroachment would occur.
- **Natural Resources and Energy Supply** – the RDP would not involve a significant increase in energy consumption nor would it require the use of unusual materials or materials in short supply.
- **Socioeconomic Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks** – the RDP would not result in a disproportionately high or adverse impact to local low-income and minority communities, nor would it require the relocation of residents or businesses.
- **Wild and Scenic Rivers** – there are no Wild and Scenic Rivers located in the vicinity of the Airport.



- LEGEND**
- Airport boundary
 - Residential land use
 - Proposed Part 77 surfaces
 - Proposed Runway Protection Zone
 - Proposed Accident Potential Zone I
 - Proposed Accident Potential Zone II

Source: Land use data provided by City of Colorado Springs.

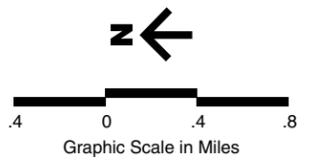


Figure 7-1
**POTENTIAL COMMERCIAL AIRPORT OVERLAY DISTRICTS WITH
 RECOMMENDED DEVELOPMENT PLAN**
 Master Plan Update
 Colorado Springs Airport
 July 2013

REQUIRED AGENCY COORDINATION AND PERMITTING

This section addresses coordination with other agencies and permits that would be required to implement the RDP. Further, this section provides an overview of the NEPA review documentation likely required to implement the RDP.

Air Quality

If ground is disturbed for more than six months and is 25 acres or more in size, an Air Pollutant Emission Notice (APEN) is required to ensure that specific measures to control dust are put into place. Because the area of earthwork would exceed 25 acres, an APEN would be obtained from the Colorado Department of Public Health and Environment. Further, the earthwork necessary to construct the RDP would also require a permit from the El Paso County Department of Health and Environment.

Farmlands

Coordination with the NRCS would be required to see if any soils within the project site could be classified as prime farmland. If prime farm land was identified, it would be regulated under the Farmland Protection Policy Act (FPPA), which requires completion of the Farmland Conversion Impact Rating Form (AD-1006) or a completion of a Land Evaluation Site Assessment (LESA), if applicable. Impacts to prime farmland are considered significant when the total combined score on Form AD-1006 ranges between 200 and 260.

Fish, Wildlife, and Plants

The Airport would be required to coordinate with the US Fish and Wildlife Service to confirm that the project vicinity still is not a habitat for any threatened or endangered species. Coordination with CNHP would be beneficial to verify that the RDP does not impact any of the designated rare species for which Airport property serves as habitat, and that it does not impact the open space located south of Runway 17R-35L.

Historic, Architectural, Archeological, and Cultural Resources

The Airport would be required to request a Letter of Determination from OAHP to verify the absence of any historic, architectural, cultural, or archaeological resources in the vicinity of the RDP. The Airport would also be required to coordinate with local tribal representatives to verify that no archeological or cultural resources of tribal significance are located in the vicinity of the RDP.

Water Quality

Because construction activities would involve the disturbance of more than one acre of ground, the Airport would be required to seek a construction storm water permit and any other applicable permit from the Colorado Department of Public Health

and Environment Water Quality Control Division. Additionally, the Airport would be required to seek an erosion control permit from the Colorado Springs City Engineer's office. The Airport would be required to update their Stormwater Management Plan if any construction activities modify stormwater runoff patterns.

Wetlands

A Clean Water Act Section 404 permit is required from the U.S. Army Corps of Engineers if proposed airport development would require dredging or filling navigable waters or wetlands, known collectively as "waters of the United States."

Local Coordination

Based on previous development projects, Airport management should coordinate with the US Air Force and US Army to seek their participation regarding the RDP. Further, Airport management should meet with the Airport Open Space Advocates (AOSA), a local environmental interest group that participated in the 2006 Environmental Assessment for the Airport Business Park, to visit the site and discuss the RDP. Discussion should include consideration of prairie management strategies outlined in *Colorado Springs Open Space Management Plan: A Resource Management Guide* to ensure that the RDP is compatible with existing land use plans. Written confirmation that AOSA does not object to the RDP should be obtained, if possible.

National Environmental Policy Act Review

Based on implementation guidelines provided in FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, it is likely that the key projects in the RDP, needed to reconfigure the airfield to meet safety and functional requirements, would require an Environmental Assessment, although the appropriate level of environmental review would ultimately be subject to FAA oversight. Specifically, a runway extension, as envisioned in the RDP, normally requires an Environmental Assessment according to Section 702 of FAA Order 5050.4B.

Although the runway extension that comprises the majority of the RDP is proposed based upon a foundation of mitigating the risk of wrong runway departures (as opposed to accommodating future demand or larger aircraft), it would not likely be eligible for a Categorical Exclusion since changes to noise contours resulting from the shifted runway location could represent an extraordinary circumstance as listed in Table 6-3 of FAA Order 5050.4B. Other environmental resource categories, as summarized in preceding sections, would need to be evaluated as well. However, the preceding qualitative analysis indicates that any resulting environmental impacts are unlikely to be significant and could be mitigated.

Accordingly, the context and minimal intensity of any potential environmental impacts is unlikely to trigger the requirement for an Environmental Impact

Statement (EIS), based on Section 501 of FAA Order 1050.1E, which details Actions Requiring Environmental Impact Statements. In evaluating the need for an EIS, “context” refers to the setting and effects on the local area, while “intensity” measures the severity of potential impacts. Based on the preceding overview and FAA Guidelines for evaluating these criteria, neither context nor intensity of potential environmental consequences appears to merit an EIS, making an Environmental Assessment the likely level of environmental review appropriate for the key projects in the RDP. Less intrusive projects with independent utility, such as paving a vehicle service road, could likely be accomplished through preparation of a Categorical Exclusion.