

U.S. AIR FORCE ACADEMY



DEPARTMENT OF THE AIR FORCE
10TH MISSION SUPPORT GROUP
USAF ACADEMY COLORADO

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MAY 10 2004

Mr. William C. Jones
Division Administrator
Colorado Federal Aid Division
555 Zang Street Room 250
Lakewood CO 80228-1040

Dear Mr. Jones

1.....The United States Air Force Academy (USAF) appreciates the opportunity to review and
2 comment on the I-25 Environmental Assessment and Draft 4(f) Evaluation. Our review
3.....comments are attached to this letter. We are primarily concerned with impacts caused by
4 additional storm water runoff and mitigation of those impacts. Restoration and mitigation
5.....measures for addressing construction impacts are also important considerations for USAFA.
6
7.....We encourage close cooperation between your office and USAFA to ensure our concerns are
8 addressed during finalization of construction plans. Should your staff have any questions, please
9.....contact Mr. Bryce Tobyne at (719) 333-6455 or Ms. Jonena Hearst at (719) 333-8367.

Sincerely,


THOMAS F. HAYDEN III, Col, USAF

Attachment:
U.S. Air Force Academy Review Comments



RESPONSE

Lines 3-5: See responses to detailed comments in the attachment to this letter.

Lines 7-8: Indeed, FHWA and CDOT look forward to close cooperation with the Air Force Academy throughout the design and construction phases of the project. FHWA and CDOT appreciate these comments and all the assistance that has been provided by the Academy as a Cooperating Agency for the I-25 Environmental Assessment.

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US Air Force Academy Review Comments For Environmental Assessment and Draft 4(f) Evaluation I-25 Improvements through the Colorado Springs Urbanizes Area March 2004	RESPONSE
General Comments 1. The document and appendices are excessively large. There is too much detail included for an Environmental Assessment, or it should have been an Environmental Impact Statement (EIS). Much information can be included in the administrative record instead of the document or appendices. 2. We find the proposed new lanes will relieve traffic congestion at the North Gate entrance. For security reasons, we do not encourage any additional trails entering USAFA property, such as the proposed Smith Creek Trail. 3. CDOT has an easement for the portion of I-25 which is located on USAFA property. The proposed widening of I-25 requires an amendment to the existing easement. Specific Comments 1. Page 2-7, second column, Alternative Determined to be Not Feasible: We recommend replacing the term “feasible” with the NEPA term “reasonable.” We also recommend including in Section 1, Purpose and Need, a brief discussion of the concept of economic feasibility. 2. Page 3-106, Table 3-28: The table lists about 400 trees to be removed at riparian crossings and the North Gate interchange. Please include a statement that FHWA and CDOT will coordinate with USAFA Natural Resources on disposition of trees displaced on USAFA property. 3. Pages 3-127 and 3-128, Native American Consultation: If “undiscovered archaeological resources” also fit the definition of “cultural items” under Native American Graves Protection and Repatriation Act (NAGPRA), it will not be sufficient to notify an archaeologist as stated on page 3-126, second column. NAGPRA has stringent notification/consultation requirements in which a federal agency is required to provide immediate notification to affiliated tribal representatives, as well as a 30-day cessation of activity during which consultation takes place. With respect to Native American cultural items, archaeologists would not be deemed appropriately qualified for this determination. We suggest adding a brief discussion describing procedures if “undiscovered archaeological resources” are found that also fit the definition of “cultural items” under NAGPRA. We further advise this language be included on Page 3-126, second column for consistency.	<u>General Comment #1:</u> The EA and its appendices were approved by the FHWA on March 17, 2004. Determination of the appropriate level of NEPA documentation for a Federal action is based on significance of impacts, and not on the length of the document. The length of the I-25 EA is due to the number of issues addressed, which included a Draft 4(f) Evaluation, wetland finding, biological opinion, Native American consultation programmatic agreement, and floodplain reference maps, as well as a special section focusing on U.S. Air Force Academy issues. <u>General Comment #2:</u> Traffic relief in the vicinity of I-25 Exit 156 is verified by the projections contained in EA Appendix 1. The EA notes at page 3-140 that El Paso County desires to connect its Smith Creek Trail to the New Santa Fe Trail, but that the Air Force Academy has reservations about allowing this connection on USAFA property. The EA provides for this connection if the Academy will allow it, but does not require it. No such trail would be built on Academy property without USAFA concurrence. <u>General Comment #3:</u> The need for an easement modification is clearly stated in the EA at pages 3-25 Right-of-Way, and 3-141, U.S. Air Force Academy Resources, and related discussion is found in Section 6, Draft 4(f) Evaluation. <u>Comment #1:</u> The text on page 2-7 reports the results of the <i>Mode Feasibility Alternatives Analysis</i> (MFAA). The MFAA documents the broad range of alternatives that were examined and differentiates between those alternatives that were determined to be <i>feasible</i> from those that were considered clearly <i>not feasible</i>. Feasible alternatives were then subjected to further analysis in the MFAA to arrive at a range of <i>reasonable</i> alternatives. The use of the word “feasible” is deliberate in this case. Regarding economic feasibility, the MFAA discusses the range of capital costs used in the screening and analysis of alternatives, while the EA describes reasonable funding levels and sources for this corridor. For example, it is noted in the EA at 3-7 that the Pikes Peak Region does not currently have a dedicated funding source for transit. The EA states at page 3-17 that for the Proposed Action “[t]he overall cost of improvements is on the order of approximately a half billion dollars, but expenditures would occur over a number of years, depending upon availability of project funding.” Page 19 of the <i>Air Quality Technical Memorandum</i> in Appendix 3 notes that the Proposed Action is included in the currently approved regional long-range transportation plan and short-range transportation improvement program. The long-range plan is fiscally constrained, meaning that it can only contain projects for which foreseeable funding is reasonably available. Page 19 in Appendix 3 states that approximately \$120 million in revenue bond proceeds could be utilized for the I-25 corridor by the Colorado Transportation Commission. <u>Comment #2:</u> FHWA and CDOT will indeed coordinate with the USAFA Natural Resources staff regarding the disposition of trees displaced on USAFA property. The EA indicates at page 3-146 that “[t]he I-25 corridor on Air Force Academy property will be re-vegetated in a manner that is consistent with the Academy’s wildlife management objectives.” Also, page 3-106 of the EA indicates that “[o]n Air Force Academy land, CDOT will work with the Air Force to replace mature trees...” <u>Comment #3:</u> The process for tribal consultation and involvement is described in detail in the EA in Section 9, the Programmatic Agreement between FHWA, CDOT, SHPO and the tribes. Articles 7 and 8 of the Agreement at page 9-6 deal with construction monitoring, emergency discoveries, and Native American graves.

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4. Page 3-134, second column, Briargate and Interquest Interchanges: The last sentence of this page indicates that the two new exchanges on Academy property (Briargate and Interquest) were built in the last decade. The last sentence of the first column on this same page says that Briargate was built in 1987 (17 years ago). The text should be corrected to make statements consistent.	<u>Comment #4:</u> The 1987 completion date reported here (and also on page 3-5) is correct. The statement in question indicates that, “[t]hese two interchanges were constructed within the last decade, and are wide enough to accommodate the addition of lanes on the Interstate 25 mainline.” While the “last decade” reference is erroneous, it does not alter the point of the sentence, which is that the interchanges would not need to be widened to accommodate the Proposed Action.
5. Page 3-137, Visual Issues: The words “view shed” at the beginning of this section may not be familiar to readers. We suggest rewording this sentence to “Vistas of the Air Force Academy, as seen from I-25, are of a mountainous, natural rural setting. Located as it is on the west side of the highway and adjacent to the Pike National Forest, the Air Force Academy is a scenic resource for the Pikes Peak Region.”	<u>Comment #5:</u> The suggested language reflects a preference of style than an issue which would affect the meaning or outcome of the environmental analysis. Clarification of the EA does not appear to be warranted.
6. Page 3-138, Safety Concerns: The final sentence of this section notes that the Air Force Academy does not want any more crossovers. However, we see no discussion of CDOT’s position on this matter here or later in the text. CDOT’s position regarding the crossovers should be described.	<u>Comment #6:</u> The cited statement appears in the discussion of “Current Conditions,” for information only. For the record, CDOT’s position on the matter of crossovers does not differ from USAFA’s. Since the point does not affect the Proposed Action, No-Action Alternative, or Mitigation, clarification of the EA does not appear to be warranted.
7. Page 3-139, Threatened and Endangered Species: The second paragraph states “Other threatened and endangered species use the Academy on a migratory basis…” Please identify other threatened and endangered species and expand discussion to include the relationship of proposed action to migratory routes for these species.	<u>Comment #7:</u> The statement in the EA is vague. According to the Academy’s August 1997 <i>Integrated Natural Resources Management Plan and Environmental Assessment</i>, “[o]ther threatened or endangered candidate or listed species that use the Academy as migrants or have the potential to occur on the Academy include the peregrine falcon (<i>Falco peregrinus</i>), Mexican spotted owl (<i>Strix occidentalis lucida</i>), Arkansas darter [<i>Etheostoma cragini</i>], Ute ladies’ tresses orchid (<i>Spiranthes divuvialis</i>), mountain plover (<i>Charadrius montanus</i>), and Colorado butterflyweed (<i>Gaura neomexicana</i> ssp. <i>Coloradensis</i>).” As noted in the EA at page 3-139, “none of these were found in the I-25 study area.” The Proposed Action would in no way impede the migration of the peregrine falcon, Mexican spotted owl, or the mountain plover. The other species are non-migratory.
8. Page 3-142, Figure 3-24: The figure does not show the North Gate/Powers Interchange expansion as stated at the end of paragraph three, on page 3-141. The figure should be corrected to reflect statements reflected in the text.	<u>Comment #8:</u> The comment is correct. Figure 3-24 is described as depicting the North Gate/Powers Interchange but it actually depicts the comparative locations of the existing and proposed locations of the Ackerman Overlook. The correct figure is being provided in a clarification to the EA that can be found in Section 7 of this FONSI.
9. Page 3-141, Security Concerns: We suggest replacing the word “vehicle” with the word “entry” in the last sentence of this paragraph.	<u>Comment #9:</u> The sentence in question mentions security force response to “an unauthorized vehicle at either gate.” The word “entry” would better reflect unauthorized entry in any manner, such as on foot as well as by vehicle.
10. Page 3-143, Wildlife and Vegetation, first paragraph: There is a contradiction in the first paragraph as to the location of the prairie dog colony from what was stated earlier (p. 3-138, second to the last paragraph). The text should be revised to state the colony is located in the northwest quadrant.	<u>Comment #10:</u> As noted in the comment, the description on page 3-138 is correct, and page 3-143 contains a typographical error. Page 3-143 indicates that the prairie dogs are found in the interchange’s “northeast” quadrant, when actually, they are found in the northwest quadrant.
11. Page 3-143, Wildlife and Vegetation: Total acreage restored from closing the existing Ackerman Overlook should be included in this section.	<u>Comment #11:</u> The existing Ackerman Overlook utilizes approximately one-half an acre in paved area and another one-quarter acre for pedestrian activity. This total of 0.75 acre would be revegetated for compatibility with adjacent grasslands and would slightly offset the 5.2 acres of grassland that would be permanently lost due to construction of the new Ackerman Overlook.
12. Page 3-145, Noise: There is no proposed mitigation for the increased noise to users of the LaForet, Smith Creek, and New Santa Fe trails. Consider rerouting the New Santa Fe trail westward into the pine forest for the segment that presently uses the Santa Fe Railroad Grade.	<u>Comment #12:</u> As indicated on page 3-45 of the EA, ‘Due to the linear nature of bicycle and pedestrian facilities, the construction of noise barriers to protect them would be impractical and would have adverse impacts to users, such as the loss of an open setting, and reduced safety due to the isolation.’ Also, berms or noise walls on Academy property could be visually intrusive and change the feel and setting of the historic cultural landscape.” As is noted on page 3-140 of the EA, the Air Force Academy has on several occasions temporarily closed the New Santa Fe Trail on USAFA property for security reasons. FHWA has been under the impression that relocating the trail closer to the Academy’s key assets could raise security concerns. For example, comment #2 above indicated that “[f]or security reasons, we do not encourage any additional trails entering USAFA property.” FHWA suggests that the matter be resolved during further interagency consultation during the design phase for the Proposed Action.
13. Page 3-145, Water Resources: The first paragraph suggests that additional runoff from construction activities and, subsequently, from the addition of new lanes and ramps is considered small. However, the location of the runoff so near sensitive riparian areas will likely result in impacts because there will be little time or distance for attenuation of impact from the added storm water. Include a statement that detention measures, developed in coordination with USAFA, will be included in the mitigation for storm water from this project.	<u>Comment #13:</u> This paragraph appears in the discussion of Impacts of the Proposed Action. In the later discussion of Mitigation, language that addresses the comment is found in the first paragraph on page 3-148, which states, “CDOT will mitigate stormwater runoff impacts on Air Force Academy property through the use of Best Management Practices…” These BMPs, like other features of roadway design, will be developed in coordination with the Air Force Academy.

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	RESPONSE
14. Page 5-1, first column, Public Involvement. No list of information repositories exists. We suggest including a list of publicly accessible information repositories for the EA. 15. Page 5-1, first column, Public Meetings and Workshops. Not enough detail exists to understand the type of public meetings. We suggest a distinction be made between public scoping and intergovernmental meetings and include meeting details, such as locations, dates and times, and the media used to announce the meetings. 16. Page 5-1, first column, Public Involvement: No documentation exists describing efforts made to contact interested parties. We suggest including documentation, such as dates of contact efforts and names of individual points of contact, where appropriate. 17. Page 5-1, second column, Newsletters: This paragraph lacks details about newsletters, postcards, and media notices. We suggest adding newsletter circulation numbers and readership and numbers of postcards and media notices sent. 18. Page 5-1, second column, second paragraph, Web Site: No URL address is provided. We suggest adding the I-25 web site URL address so reviewers know where to find the proposed project information. 19. Page 5-1, second column, Advertisements and Flyers, first bullet and page 5-22, first column, first bullet: Details of advertisements and flyers or brochures are lacking. We recommend providing more details, such as names of print and broadcast outlets, brochure circulation numbers, and dates the information booth was open at the Chapel Hills Mall. 20. Page 5-2, first column, Mailings: The details of mailings are lacking. We recommend adding numbers of meeting postcards mailed and names of elected officials who received project information. 21. Page 6-1, first column, Introduction, fifth paragraph: The excerpt from the statute may not be accurate. There are small differences [in the language used in the EA] that don’t exist in [our copy of] the statute. We recommend verifying the excerpt of Section 303 used in the EA is consistent with that of the statute. 22. Page 6-3, third paragraph, The “Proposed Action Alternative” says the construction of the North Gate/Powers Interchange and the relocation of Ackerman Overlook require a modification of the easement and result in a taking of section 4(f) property. It is unclear that a state highway department can “take” 4(f) property owned by the federal government. We suggest the term “take” be replaced with “use,” the term also found in the statute. 23. Page 3-146, Wildlife and Vegetation, page 3-147, Historic Resources: Restoration efforts must be sustained long enough to ensure success of mitigation measures. This may take several years of recurring landscape maintenance of disturbed areas before new plantings become sufficiently established to survive. Add statements requiring monitoring of mitigation measures on USAFA property.	<u>Comment #14:</u> A listing of locations where the I-25 EA is publicly available is provided in Section 3 of this FONSI, is posted on the project website (i25environment.com) and was published in March 2004 newspaper advertisements announcing the availability of the document for public review <u>Comments #15-20:</u> Public outreach details including meeting scopes, dates and locations are included in EA Appendix 10, Public Involvement Technical Memorandum. That appendix also includes information about the project website and newsletters. Additional detail is available in the project administrative record. <u>Comment #21:</u> The comment is appreciated. The wording in the Draft Section 4(f) Evaluation indeed does differ from the statute. The correct, current wording has been incorporated in the Final Section 4(f) Evaluation that is included in this FONSI document. <u>Comment #22:</u> The suggested term “use” had been substituted in the Final Section 4(f) Evaluation that is included in this FONSI document. <u>Comment #23:</u> It is recognized that restoration of vegetation means successful restoration and not merely attempted restoration. Successful revegetation is also a requirement of the Colorado Discharge Permit System General Permit for construction activities that disturb one acre or more. The EA at page 3-146 states that, “[t]he I-25 corridor on Air Force Academy property will be re-vegetated in a manner that is consistent with the Academy’s wildlife management objectives.” The EA at page 3-108 includes as mitigation for noxious weed impacts a management plan that includes re-establishment of native vegetation and <i>long-term</i> maintenance to control weed propagation [emphasis added]. Also, the Biological Opinion (EA Section 8, page 31) stipulates that [t]he FHWA will monitor all aspects of proposed onsite restoration and enhancement to assure project completion and success.”

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	RESPONSE
24. Appendix 3, pages 5 through 8 and page 13: Tables 4-1 through 4-4,: Tables should include current estimates of average weekday vehicle mileage, various pollutant emissions, and carbon monoxide. 25. Appendix 9: The relationship between selected case studies and proposed action is unclear. The text should be revised to clarify the relationships. Irrelevant case studies should be eliminated. 26. Appendix 9, page 2-2, second column, second paragraph, first sentence: No reference to page on which policy-level or project-level strategies exists. Insert a page reference to location of policy-level and project-level strategies. 27. Appendix 9, Table 2-6, page 2-34: Data is limited to current land cover types. We suggest adding data on acreage of land cover types for the year 1955 and 2025 (projected) land usage to support discussion of cumulative impacts. 28. Appendix 9, Table 2-7, page 2-36: Second column and rows for (Preble’s meadow jumping mouse, Ferruginous hawk, Mountain Plover, Black-tailed prairie dog, Black-footed ferret). Table subheadings are not consistent with column text. Text reads “...potential for effect.” There is a potential for impact and various types of effects. We suggest replacement of “potential for effect” with “potential for impact” and more fully describe the effect as loss or fragmentation of habitat, as appropriate. 29. Appendix 9, Table 2-3. The table is difficult to interpret because the baseline for change is unclear. Add a footnote explaining the change in column 2 is based on 2000 conditions. Add an additional column giving total percentage change from original (1955) to projected (2025). 30. Appendix 9, pages 2-19 through 2-32: Describe quantitatively the changes in land use between 1955 and 2025. 31. Appendix 9, page 2-20, second paragraph, last sentence: The last sentence is not relevant to discussion of vegetation. The sentence should be eliminated. 32. Appendix 9, pages 2-21 and pages 2-29 and 2-31, 2-32: Figure 2-11 list Urban – Woodmen Road as site 8. Page 31 and 32 lists Urban – Woodmen Road as Comparison Site 7. The text should be consistent with the figure. 33. Appendix 9, pages 2-22 through 2-31: Reference points are only shown on lower photographs. Reference points should also be shown on upper aerial photographs. 34. Appendix 9, pages 2-22 through 2-32, Comparison Sites: The analyses should include acreage estimates of land use types, permeable, and impermeable surfaces. 35. Appendix 9, page 2-34, final paragraph, first sentence: Sentence reads, “...that can ultimately and affect...”. Delete “and” so sentence reads “...that can ultimately affect...”.	<u>Comment #24:</u> The Pikes Peak Area Council of Governments estimated that total regional vehicle miles of travel (VMT) for an average weekday in the year 2000 was 10.5 million, as reported in the EA on page 4-15. PPACG estimated that total mobile source carbon monoxide emissions under conformity-required modeling conditions in the year 2000 amounted to 150 tons per day, as reported in the EA at page 4-12. PPACG emissions estimates for other pollutants are not a part of the required regional conformity analysis. Although I-25 corridor emissions were not modeled for the year 2000, it can be seen from Table 4-2 on page 5 of the Air Quality Impacts Technical Memorandum (in EA Appendix 3) that emissions of hydrocarbons (HC) and oxides of nitrogen (NO_x) are declining over time due to improved vehicle technology, even while total VMT increases. Hydrocarbon emissions in the corridor are projected to decrease by more than 50% between 2007 and 2025 in both the No-Action and Proposed Action Alternatives, and NO_x is projected to decrease by more than two-thirds, even while VMT increases by up to 47 percent. <u>Comments #25-35:</u> These comments pertain to Appendix 9, a report entitled <i>Sustaining Nature and Community in the Pikes Peak Region: A Sourcebook for Analyzing Regional Cumulative Effects</i>. That report was prepared as an information resource helpful in the analysis of cumulative effects of the Proposed Action (see EA Section 4). That report is now being formatted for printing as a stand-alone document for public use in the consideration of other public and private actions. Consideration of these comments will occur in that final formatting process, but since the comments are largely editorial in nature, they would not affect the content of the information that was relied on in the EA, nor any resulting EA conclusions.

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36. Appendix 9, 2-41, Additional Data: First paragraph references hydrology section. There is no section labeled “Hydrology”. EA has a section titled Water Resources and Issues. Estimates of percent impervious surface are found under Water Quality and Quantity. Text should be consistent with terminology found in EA, page 4-9. We suggest adding a page reference for the reader. 37. Appendix 9, page 2-41, Additional data, last paragraph, last sentence: Last sentence should read “The following summarizes the important characteristic and change for each site.”	<u>Comments #36 and 37</u>: As noted in the response to comments 25 to 35 on page 5, these comments are editorial in nature, and it is not necessary to include such changes as clarifications to the I-25 Environmental Assessment. However, the comments are appreciated and will be taken into consideration in the final formatting of the Appendix 9 regional cumulative effects analysis when it is printed as a stand-alone document.