

**DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI)
AND
FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)**

**Northern Monument Creek Interceptor
U.S. Air Force Academy, Colorado**

Pursuant to provisions of the National Environmental Policy Act (NEPA), Title 42 United States Code Sections 4321 to 4347, implemented by Council on Environmental Quality (CEQ) Regulations, Title 40, Code of Federal Regulations (CFR) §1500-1508, and 32 CFR §989, Environmental Impact Analysis Process, the U.S. Air Force (Air Force) assessed the potential environmental consequences associated with the Northern Monument Creek Interceptor (NMCI) project (NMCI or project) at the U.S. Air Force Academy (USAFA) in El Paso County, Colorado.

The purpose of the project is for Colorado Springs Utilities (Utilities) and for two northern sanitary sewer service providers: Forest Lakes Metropolitan District and Triview Metropolitan District (the northern entities) to consolidate wastewater treatment systems into a centralized system that is environmentally and fiscally responsible, provides for increased system reliability, accommodates future growth, and maintains compliance with more stringent water quality regulations. The project is needed to comply with water quality regulations by consolidating regional providers within the upper Monument Creek watershed, meet future treatment capacity limits, and improve system reliability and sustainability.

The Environmental Assessment (EA), incorporated by reference into this FONSI and FONPA, analyzes the potential environmental consequences of activities associated with the project and provides environmental protection measures to avoid or reduce adverse environmental impacts.

The EA considers all potential impacts of Alternative 1 – No Action Alternative, Alternative 2 – Eastern Alignment (Preferred Alternative) and Alternative 3 – Western Alignment. The EA also considers cumulative environmental impacts with other projects.

ALTERNATIVE 1 – No Action Alternative

Under the No Action Alternative, the Preferred Alternative would not occur and the Air Force would not approve the construction, operation, and maintenance of the NMCI and associated facilities within the USAFA boundary, and the NMCI would not be constructed. The northern entities and Utilities would continue their current operations by operating and maintaining their existing facilities. The northern entities and Utilities would improve their wastewater treatment facility (WWTF) as needed to meet future hydraulic and organic loadings, and to comply with future regulations.

ALTERNATIVE 2 – Eastern Alignment (Preferred Alternative)

Under Alternative 2, Utilities would construct the NMCI along a generally easterly alignment, for a total length of approximately 10.1 miles, including laterals. The NMCI pipeline would be constructed with 30-inch- and 36-inch-diameter pipe. Generally, the pipeline would be constructed within a 100-foot-wide permanent easement and supplemented by a variable temporary construction easement, as necessary. The Air Force would grant the easements for the portion of the NMCI that crosses the USAFA. Several directionally drilled bores and inverted

siphons would be required at road or stream crossings to minimize impacts on traffic during construction and reduce impacts on natural and cultural resources.

The alignment for Alternative 2 would start at the Upper Monument Creek WWTF intake and would continue south. From the USAFA northern boundary, the pipeline would be constructed west of Interstate 25 (I-25) adjacent to the New Santa Fe Trail to the northern side of the USAFA Davis Airfield. At that point, the pipeline would cross perpendicularly north of the airfield to minimize impacts on airfield operations. The pipeline would continue south along the eastern side of Monument Creek and then turn east, cross I-25, and connect to the existing Pine Creek Interceptor. Wastewater flows would then be conveyed through the existing collection system to the J.D. Phillips Water Resource Recovery Facility (J.D. Phillips WRRF) in Colorado Springs.

Alternative 2 would also include construction of four lateral connections to the NMCI from the Smith Creek, Monument Branch, Middle Tributary, and Black Squirrel Creek No. 2 (the Farm) lift stations and closure of the lift stations. The Middle Tributary lateral would be completed concurrently with the NMCI pipeline, while the other three laterals would be completed at a later date.

ALTERNATIVE 3 – Western Alignment

Under Alternative 3, Utilities would construct the NMCI along a more westerly alignment that generally follows Monument Creek. Alternative 3 differs from Alternative 2 south of the USAFA boundary. North of the northern boundary of the USAFA, Alternative 3 would be the same as Alternative 2. The southern portion of Alternative 3 would parallel Monument Creek and the Burlington Northern Santa Fe Railroad. The total length of the NMCI under Alternative 3 would be approximately 12.4 miles, including laterals. The Smith Creek, Monument Branch, Middle Tributary, and Black Squirrel Creek No. 2 laterals would be longer than in Alternative 2 because they would be extended further west to connect to the more western location of the NMCI and would require additional crossings of Monument Creek. Alternative 3 would also require construction of a permanent crossing of Monument Creek to access a section of proposed pipeline that is situated between the railroad alignment and Monument Creek just north of North Gate Boulevard.

SUMMARY OF FINDINGS

The analyses of the affected environment and environmental consequences of implementing the Preferred Alternative presented in the EA concluded that by implementing standing environmental protection measures and operational planning, the Air Force would be in compliance with all terms and conditions and reporting requirements for implementation of the reasonable and prudent measures stipulated by the United States Fish and Wildlife Service (USFWS) in the Biological Opinion issued March 11, 2024, and with the conditions stipulated in the Memorandum of Agreement signed by USAFA, Utilities, the Colorado State Historic Preservation Office, and the Southern Ute Indian Tribe.

The Air Force has concluded that no significant adverse effects would result to the following resources as a result of the Preferred Alternative: air installation compatible use zones, noise, air quality, water resources, hazardous materials/waste, biological/natural resources, cultural resources, and recreation. No significant adverse cumulative impacts would result from activities associated with Alternative 2 (Preferred Alternative) when considered with past, present, or reasonably foreseeable future projects.

Air Installation Compatible Use Zones (AICUZ): As described in Section 4.2.2 of the EA, the Preferred Alternative would require construction activities to occur within the AICUZ. Work within the AICUZ under Alternative 2 would be carefully monitored and restricted to avoid hazards to airfield operations and would be carefully coordinated with airfield operations to

avoid conflicts. The work would be scheduled for times when the airfield is not in use. Operations of the airfield may be briefly adversely affected during construction. Utilities would work closely with the construction contractor and the airfield to minimize disruptions. A risk assessment, including mitigation measures, would be developed for work within the AICUZs. Mitigation measures could include night work or other restrictions on timing of work and high visibility flagging on equipment. With the implementation of design measures such as timing restrictions for work within the AICUZ, and implementation of additional mitigation measures developed through the risk assessment, impacts on the AICUZ would be temporary and minor, and would not be significant.

Noise: As described in Section 4.3.2 of the EA, short-term increases in noise would occur from operation of construction equipment as well as the increase in construction vehicle traffic noise along roads used for access. Impacts would be short-term, minor, and adverse and would last only for the 12-month duration of construction. Increases in noise levels would be detectable at some residences within 0.5 mile of the construction area. Increased noise levels above ambient levels would only occur for about one to two weeks at any one location and would not be significant.

Air Quality: As described in Section 4.4.2 of the EA, the project would not result in exceedance of the general conformity de minimis threshold for any of the criteria pollutants; therefore, impacts on air quality would be minimal. Overall, impacts on air quality would be short-term, lasting only during construction, and would not be significant.

Water Resources: As described in Section 4.5.2 of the EA, pipeline construction would disturb soils and increase the potential for erosion and sedimentation. Mitigation measures and Best Management Practices implemented as part of a Stormwater Pollution Prevention Plan would minimize related storm water pollution and surface water runoff. Directional drilling for construction of inverted siphons would minimize surface disturbances and would minimize impacts on streams. Pipeline construction disturbances would be temporary and following construction completion and reclamation, no additional impacts on water resources are expected to occur.

Following completion of the NMCI, wastewater flows from the TriView and Forest Lakes wastewater districts that were formerly treated at the Upper Monument Creek WWTF would flow into the NMCI pipeline and would be treated at the J.D. Phillips WRRF by Utilities. This would reduce stream flows and point source pollutants in upper Monument Creek where the current WWTFs discharge but would increase stream flows and point source pollutants discharged into lower Monument Creek where discharges from the J.D. Phillips WRRF occur. Reductions in average flows in Monument Creek would range from about 4.4% at the Upper Monument Creek WWTF to about 1.9% at Woodmen Road. Monument Creek is unlikely to be reduced to zero flow at any time because stream flow modelling did not identify any expected time periods with no flow. The project would benefit water resources by allowing Utilities and the northern entities to consolidate wastewater treatment into a centralized system, comply with water quality regulations, meet future treatment capacity needs, and improve system reliability and sustainability. Overall impacts on water resources would not be significant.

Hazardous Materials/Waste: As described in Section 4.6.2 of the EA, the Preferred Alternative alignment would avoid the existing landfill site at the USAFA. Potential impacts would be reduced or avoided by implementing the measures described in the *Mitigation Measures* Section 2.4 of the EA. If soil or groundwater contamination is encountered during construction of project facilities, mitigation procedures would be implemented to minimize the risk to construction workers and to the future operation of the project. Overall, adverse effects are expected to be minor and would not be significant.

Biological/Natural Resources: As described in Section 4.7.1.2 of the EA, all temporary impacts on vegetation would be restored and revegetated with native vegetation, and only 0.191 acre of vegetation would be permanently affected. Overall, with implementation of the restoration and mitigation measures described in the EA, impacts would not be significant.

As described in Section 4.7.2.2 of the EA, the Preferred Alternative would result in temporary impacts on 2.285 acres of riparian habitat, and 0.10 acre of wetland habitat. The Proposed Action would not result in permanent impacts on wetlands or other waters of the U.S. Most stream crossings would be bored using directional drilling, greatly reducing impacts on streams, wetlands, and riparian areas. Temporarily disturbed areas would be revegetated with native plant species, as described in the *Mitigation Measures* section of the EA. With avoidance and restoration of temporary impacts, impacts on riparian habitat and wetlands would not be significant.

Executive Order 11990, *Protection of Wetlands*, requires that each federal agency, to the extent permitted by law, “shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds: (1) that there is no practicable alternative to such construction and (2) that the proposed action includes all practicable measures to minimize harm to wetlands.” Complete avoidance of wetlands is not practicable due to the need for the project to cross multiple drainages and tributaries. Utilities has taken all practicable measures to minimize harm to wetlands, including boring most stream crossings using directional drilling and restoring 0.10 acre of temporary wetland impacts, with no permanent loss of wetlands. Utilities will obtain a Section 404 permit for impacts on wetlands, and restoration of riparian and wetland areas will be subject to success criteria and monitoring as required by Section 404 permitting.

The Preferred Alternative would result in temporary surface disturbances to 0.872 acre and permanent disturbance to 0.002 acre within the 100-year floodplain. The 100-year floodplain is defined as an area adjacent to a water body that has a 1 percent or greater chance of inundation in any given year. The Preferred Alternative would not change surface elevations and would not substantially affect floodplain functions or increase the risk of flooding in the Monument Creek watershed. Most stream crossings would be bored using directional drilling, greatly reducing disturbance within the 100-year floodplain. With avoidance and restoration of temporary impacts, impacts on floodplains would not be significant.

Executive Order 11988, *Floodplain Management*, requires federal agencies to determine whether a proposed action will occur within a floodplain and to avoid floodplains to the maximum extent possible when there is a practicable alternative. Because the NMCI would cross multiple streams and tributaries, it would not be practicable to completely avoid floodplains. Utilities has avoided and minimized harm to the floodplain to the greatest extent practicable by boring most crossings with directional drilling and using a design that would not permanently change surface elevations.

As described in Section 4.7.2.2 of the EA, construction would result in temporary disturbance of wildlife during construction and temporary habitat loss. All temporarily affected areas would be restored with appropriate native vegetation following construction. Because most riparian habitat would be avoided and temporary impacts would be restored following construction, impacts would not be significant.

Effects on the threatened Preble’s meadow jumping mouse (Preble’s) would be avoided and minimized by using directional drilling to minimize impacts on riparian and wetland habitat where this species occurs. Under the Preferred Alternative, temporary impacts would occur on 24.526 acres of Preble’s habitat along Jackson Creek, Black Forest Creek, Smith Creek, Monument Branch, Middle Tributary, Black Squirrel Creek, Monument Creek, Elkhorn Creek, Kettle Creek,

and two unnamed tributaries to Monument Creek including 24.084 acres in the USAFA conservation zone and 0.442 acre of critical habitat. About 0.040 acre of Preble's habitat will be impacted permanently from placement of manhole covers. A biological assessment (BA) has been prepared for the Preferred Alternative, which describes conservation measures that would be implemented to avoid, minimize, and mitigate for impacts on Preble's. These measures will include boring under most drainages where Preble's occurs to avoid and minimize impacts on Preble's and its habitat. Additional conservation measures will be implemented by Utilities, as outlined in the BA, including limiting construction access and staging areas to protect Preble's habitat and revegetating temporarily disturbed areas with native seed mixes. Utilities will monitor the extent of habitat impacted and monitor restoration to ensure success. The BA determined that the NMCI project "may affect, is likely to adversely affect" Preble's, "is not likely to adversely affect" Preble's critical habitat and would have no effect on other federally listed species. The USFWS concurred with this determination in a Biological Opinion dated December 11, 2023. The USAFA will adhere to the terms and conditions of the USAFA's Preble's Conservation Agreement, and Preble's conservation measures developed during consultation with the USFWS would be implemented, including meeting specific success criteria for Preble's habitat as outlined in the BA. With implementation of these mitigation measures, impacts on Preble's and its habitat would not be significant.

Cultural Resources: As described in Section 4.8.2 of the EA, impacts on cultural resources would occur in the project limits of disturbance, and adverse impacts on historic properties (i.e., cultural resources eligible or potentially eligible for listing in the National Register of Historic Places (NRHP)) would be resolved through mitigative treatments. There are 33 sites or segments of linear resources and 9 isolated finds located in the limits of disturbance that would be partially or entirely directly impacted. Most of these resources are not eligible or potentially eligible for listing in the NRHP; however, potential historic properties would be directly impacted. The project would have an adverse effect on the linear cultural feature Atchison, Topeka, & Santa Fe Railroad (5EP1003) due to impacts to its segments 5EP1003.6 and 5EP1003.24. USAFA executed a Memorandum of Agreement (MOA) among the State Historic Preservation Officer, USAFA, and Utilities, with the Southern Ute Indian Tribe as a concurring party. The MOA outlines how USAFA and Utilities will resolve the adverse impacts by preparing Level II documentation of 5EP1003.6 and 5EP1003.24 as outlined in "Historic Resource Documentation Standards for Level I, II, and III documentation" in Office of Archaeology and Historic Preservation Publication #1595. In addition, the MOA includes construction of two interpretive signs portraying the engineering design and significance of the Atchison, Topeka, & Santa Fe Railroad, the associated ranches, and the indigenous perspective on railroad development along Colorado's Front Range. Overall, impacts would be insignificant because impacts on cultural resources eligible or potentially eligible for listing in the NRHP (i.e., historic properties) would be mitigated by implementing the measures outlined in the MOA.

Recreation: As described in Section 4.9.2 of the EA, impacts on access to the New Santa Fe Trail would be temporary, occurring only during the construction period. Operation and maintenance of the NMCI would have very little impact on recreational users. For these reasons, impacts on recreation would not be significant.

Cumulative Effects: Section 4.11 of the EA reviewed cumulative impacts that could result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts that would result from the Preferred Alternative would not be significant.

FINDING OF NO SIGNIFICANT IMPACT (FONSI)/FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)

Based on my review of the facts and analyses contained in the attached EA, conducted under the provisions of NEPA, CEQ Regulations, and 32 CFR §989, I conclude that the Preferred Alternative for the Northern Monument Creek Interceptor Project would not have a significant environmental impact, either by itself or cumulatively with other known projects. Accordingly, an Environmental Impact Statement is not required. Pursuant to Executive Order 11990, Protection of Wetlands; Executive Order 11988, Floodplain Management; Air Force Manual 32-7003, April 20, 2020, Civil Engineering, Environmental Conservation; and the authority delegated by Secretary of the Air Force Order 791.1, and taking the above information into account, I find that there is no practicable alternative to this action and that the Proposed Action includes all practicable measures to minimize harm to the wetland and floodplain environments. The signing of this FONSI/FONPA completes the environmental impact analysis process.

Carlos R. Cruz-Gonzalez
Directorate of Logistics, Engineering and Force Protection

Date