

1 **DRAFT**

2 **FINDING OF NO SIGNIFICANT IMPACT (FONSI)**

3 **AND**

4 **FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)**

5 **ENVIRONMENTAL ASSESSMENT FOR AN AEROSPACE DATA FACILITY-COLORADO SUBSTATION**
6 **BUCKLEY SPACE FORCE BASE, COLORADO**

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9 Pursuant to the provisions of the National Environmental Policy Act (NEPA), as amended (*United States*
10 *Code* [U.S.C.] Title 42, Sections 4321 through 4347), the Council on Environmental Quality's (CEQ's)
11 implementing regulations (*Code of Federal Regulations* [CFR] Title 40, Parts 1500 through 1508), and the
12 Department of the Air Force's Environmental Impact Analysis Process (EIAP) (32 CFR Part 989), the
13 National Reconnaissance Office (NRO)/Aerospace Data Facility-Colorado (ADF-C) has prepared an
14 Environmental Assessment (EA) to identify and evaluate the potential impacts to the natural and human
15 environment associated with the proposed construction and operation of a new substation and
16 underground distribution system to provide future power supply needs for the exiting NRO- ADF-C
17 facility at Buckley Space Force Base (SFB), Colorado. The NRO was the lead agency for the NEPA effort,
18 and the United States Space Force (USSF) participated as a cooperating agency in the preparation of the
19 EA. The *Environmental Assessment for an Aerospace Data Facility-Colorado Substation at Buckley Space*
20 *Force Base, Colorado* is attached and incorporated by reference.

21 **Purpose of and Need for Proposed Action**

22 The purpose of the Proposed Action is to support the future power supply needs for Buckley SFB and the
23 ADF-C. The proposed power infrastructure is needed to meet the installations' current and future power
24 capacity needs.

25 **Description of the Proposed Action and Alternatives**

26 The Proposed Action includes the construction and operation of a new substation located on
27 approximately 12 to 15 acres of the northeast corner of Buckley SFB and approximately 5.7 miles of
28 underground transmission duct bank installed on- and off-base to connect the proposed substation to
29 an existing substation located at the intersection of Interstate (I-)70/Highway 287 and Powhatan Road.
30 The proposed substation and underground transmission lines would be designed, constructed, and
31 maintained by Xcel Energy, and on-installation uses and activities would be subject to easement
32 outgrants with the Department of the Air Force. Additional underground distribution lines on-base
33 would be designed, constructed, and maintained by ADF-C. The proposed substation would eventually
34 supply power to Buckley SFB and tenants of Buckley SFB.

35 **Alternatives Eliminated from Further Consideration**

36 The EA has considered all reasonable alternatives under the CEQ regulation, 40 CFR 1502.14(a), which
37 states that that all reasonable alternatives to the Proposed Action that have been eliminated must be
38 briefly discussed. Two alternatives to the Proposed Action were considered in the EA and eliminated:
39 (1) ADF-C Located Substation, and (2) Overhead Transmission Lines. There was not sufficient space for a
40 substation located within the ADF-C secure area. Due to these reasons, the ADF-C Located Substation
41 alternative was not carried forward for detailed analysis in the EA. The use of overhead transmission

1 lines could interfere with Buckley SFB flight paths and would be less secure than using underground
2 transmission. Additionally, the City of Aurora would not allow overhead transmission further east of the
3 communications tower on 6th Avenue. Due to these reasons, the Overhead Transmission Lines
4 alternative was not carried forward for detailed analysis in the EA.

5 **Description of the No Action Alternative**

6 CEQ regulation 40 CFR 1502.14(c) requires the inclusion of a No Action Alternative in the NEPA analysis.
7 Under the No Action Alternative, the substation and associated underground duct banks would not be
8 constructed. The current and future power supply needs of the ADF-C would not be met. Although the
9 No Action Alternative would not allow NRO to meet the purpose and need, this alternative is carried
10 forward as a baseline condition for comparison in accordance with 40 CFR 1502.14(c).

11 **Summary of Environmental Findings**

12 Environmental analyses focused on the following areas: cultural resources, water resources,
13 biological/natural resources, infrastructure/utilities, land use, recreation, earth resources, health and
14 safety and protection of children, air quality and climate change, hazardous materials and solid waste,
15 noise, environmental justice, and cumulative impacts. As shown in Table 1 below, NRO and USSF have
16 concluded that no significant impacts would result to these resources.

17 **Table 1. Summary of Potential Environmental Effects from Baseline Conditions**

Resource Area	Level of Impact	Cumulative Impact
Cultural Resources: Archaeological Resources	Negligible, negative, and short-term.	Less than significant
Cultural Resources: Architectural Resources	None	Less than significant
Cultural Resources: Traditional Cultural Properties	Negligible, negative, and short-term if resources are identified during consultation	Less than significant
Water Resources: Groundwater	Minor, negative, short-term (construction); negligible, long-term, negative (operations)	Less than significant
Water Resources: Surface Water	Minor, negative, and short-term (construction and operations)	Less than significant
Biological/Natural Resources: Vegetation and Wildlife	Minor, negative, and short-term (construction and operations)	Less than significant
Biological/Natural Resources: Threatened and Endangered Species	No impact on federally listed species; negligible, negative, short-term impacts (construction) on state-listed species.	Less than significant
Biological/Natural Resources: Migratory Birds	Minor, negative, short-term (construction)	Less than significant
Infrastructure/Utilities: Transportation	Minor, negative, short-term (construction)	Less than significant
Infrastructure/Utilities: Power Supply	Minor, short-term, negligible impact to the commercial tenant (construction);	Less than significant

Resource Area	Level of Impact	Cumulative Impact
	major, long-term, beneficial impact (operations) on the power needs of the NRO/ADF-C, Buckley SFB and Web Service Provider.	
Infrastructure/Utilities: Water Supply	Minor, negative, and short-term (construction)	Less than significant
Land Use	Moderate, short-term (construction); minor, long-term (operations)	Less than significant
Recreation	Negligible short-term (construction) impact to on-base trail. Long-term impacts (operations) on-base because of change in visual setting near FamCamp. Moderate, short-term impacts (construction) to recreation in the Sand Creek open space Minor, short-term (construction) impacts to the other recreation resources off-base	Less than significant
Earth Resources: Geology	Moderate, negative, short-term impacts (construction) and negligible, long-term, negative (operations) impacts within the construction footprint.	Less than significant
Earth Resources: Topography	Moderate, negative, short-term (construction); minor, negative, long-term (operations)	Less than significant
Earth Resources: Soils	Minor, negative, short-term (construction); minor, negative, long-term (operations)	Less than significant
Health and Safety and Protection of Children: Health and Safety	Minor, negative, short-term (construction); minor, negative, long-term (operations)	Less than significant
Health and Safety and Protection of Children: Protection of Children	Minor, short-term (construction)	Less than significant
Air Quality: Construction and Demolition Emissions	Minor, short-term (construction)	Less than significant
Air Quality: Construction and Demolition Emissions	Less than significant, short-term impacts on local and regional air quality (construction) and negligible, negative, short-term impacts on regional air quality GHG emissions would be expected from the construction and demolition activities associated with the Proposed Action. Estimated GHG emissions are	Less than significant

Resource Area	Level of Impact	Cumulative Impact
	substantially less than insignificance thresholds and would not noticeably contribute to regional GHG emissions.	
Air Quality: Operational Emissions	No direct, long-term emissions will occur from the Proposed Action (operations).	Less than significant
Air Quality: General Conformity Applicability	None of the applicable de minimis thresholds would be exceeded, indicating that that the project can be assumed to conform, and no significant air quality impacts would be associated with the Proposed Action.	Less than significant
Hazardous Materials and Waste and Solid Waste: Hazardous Materials	No impact on existing Environmental Restoration Program sites (construction). Minor, negative, short-term impacts (construction) and minor, negative, short-term (operations) to hazardous waste.	Less than significant
Hazardous Materials and Waste and Solid Waste: Solid Waste	Negligible, negative, short-term (operations) impacts on-base; negligible, negative, long-term (operations) impacts off-base.	Less than significant
Noise	Moderate, negative, short-term (construction) impacts to sensitive land uses; minor, negative, and short-term (operations) impacts on workers at the substation.	Less than significant
Environmental Justice	Moderate, negative, short-term (construction) noise impacts	Less than significant

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2 **Mitigations**

3 NRO shall take steps as appropriate to the action and shall monitor these as necessary to ensure that
4 avoidance, minimization, and/or mitigation measures as set forth in the Final EA under the various
5 impact categories are implemented. These avoidance, minimization, and mitigation measures include:

- 6 • Impacts to wetlands or waters of the U.S. will be mitigated through obtaining required permits from
7 the US Army Corps of Engineers (USACE).
- 8 • 50-foot buffers will be staked and maintained throughout construction around National Register of
9 Historic Places (NRHP)-eligible sites.
- 10 • If avoidance is not possible, archaeological sites should be surveyed/evaluated for NRHP eligibility,
11 and the State Historic Preservation Office should be consulted for eligibility.
- 12 • Incorporate NRHP-eligible sites and buffers into design plans.

- 1 • Follow Standard Operating Procedure 7.4 of the Buckley ICRMP, Discoveries of Archaeological
2 Resources and NAGPRA Cultural Items (Appendix H).
- 3 • Conduct pre-construction burrowing owl surveys and establish construction buffer zones.
- 4 • If burrowing owls are identified within 300 feet of the project area during construction, then
5 consultation with Colorado Parks and Wildlife (CPW) would occur to determine potential of adverse
6 impacts and potential mitigation measures.
- 7 • Conduct pre-construction nesting bird surveys. If nests are found during pre-construction surveys,
8 consult with CPW to develop additional minimization/avoidance options for the project.
- 9 • Limit construction activities to occur outside migratory bird nesting periods if possible.
- 10 • Work within 0.5 mile of an active bald eagle nest must be completed within the timeframe of
11 1 December through 15 July. Contractor must consult with CPW regarding nest disturbance
12 monitoring and must apply for a take permit with the U.S. Fish and Wildlife Service (USFWS).
- 13 • Work within 0.5 mile of an eagle roost must be completed within the timeframe of 15 November
14 through 15 March. Contractor must consult with CPW regarding roost disturbance monitoring and
15 may need to apply for an eagle take permit with the USFWS.

16 **Public Review**

17 An Early Public Notice was published in the Aurora Sentinel and Denver Westword newspapers on
18 7 September 2023, and in the Colorado Politics, Denver Business Journal, and the Denver Post
19 newspapers on 8 September 2023, announcing commencement of the EA detailing that the action
20 would take place in a floodplain/wetland and seeking advanced public comment. No comments were
21 received. A public notice was placed in the [name(s) of newspaper(s)] on [DATE] announcing the
22 availability of the Draft EA and Draft FONSI/FONPA for public review and comment. The documents
23 were made available for review on the internet at [insert link] from [public comment period start date]
24 to [public comment period end date]. The Air Force received comments from [##] public agencies during
25 the review period. [Provide brief description of the comments received].

26 Tribal consultation letters were mailed to federally recognized tribes on [DATE]. [Provide brief
27 description of the responses received]. Additional attempts to contact tribal representatives were made
28 throughout the duration of EA development by [identify office/group responsible for follow-ups].
29 Appendix A includes records of all correspondence with the tribes.

30 **Finding of No Practicable Alternative**

31 Pursuant to Executive Orders 11988, 11990, and 13690, and considering all supporting information, I
32 find there is no practicable alternative to the Proposed Action, which will impact floodplains and
33 wetlands. As noted in the attached EA, there are no practicable alternatives that would avoid all impacts
34 or further minimize impacts to wetlands based on routing requirements, security requirements, and
35 existing environmental constraints. All alternatives considered connecting the existing substation and
36 Buckley SFB will cross floodplains and water bodies. Wetland impacts would be avoided and minimized
37 to the greatest extent practicable during project design and permitting. The proposed improvements

1 would be underground and would not impact floodplains. The finding fulfills both the requirements of
2 the referenced Executive Orders and the EIAP regulation, 32 CRF 989.14(g) for a FONPA.

3 **Finding of No Significant Impact**

4 Based on my review of the facts and analyses in the attached EA, which is hereby incorporated by
5 reference, conducted under the provisions of NEPA, CEQ's implementing regulations, and the EIAP,
6 I conclude that the Proposed Action would have no significant environmental impact, either by itself or
7 cumulatively with other known projects. Accordingly, an Environmental Impact Statement is not
8 required. This analysis fulfills the requirements of NEPA, the CEQ's implementing regulations, and the
9 EIAP. The signing of this FONSI completes the EIAP.

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15 _____ Date
16 Elizabeth L. Arthur
17 Chief of Support, Aerospace Data Facility-Colorado (ADF-C)

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23 _____ Date
24 Paul G. Filcek, Col, USAF
25 Director, Space Force Mission Sustainment
26 (Engineering, Logistics, & Force Protection)