



DEPARTMENT OF THE AIR FORCE
10TH CIVIL ENGINEER SQUADRON
USAF ACADEMY COLORADO

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Mr. Ryan Howser
El Paso County
E.P.C. Planning and Community Development
2880 International Circle
Colorado Springs CO 80910

Dear Mr. Howser

Subject: USAFA's review of the proposed Urban Landing PUDSP development (File no. PUDSP243)

The United States Air Force Academy (USAFA) received notification from El Paso County (EPC) regarding a review request for the proposed Urban Landing PUD (Planned Unit Development). We appreciate the opportunity to comment on this proposed development. Our comments focus on:

- Stormwater and stream degradation
- Recordation of an avigation easement
- Inclusion of a noise notice on final plats and lease agreements

Upon closer review of the drainage report, USAFA believes that the stormwater analysis and proposed solutions has inaccuracies. Fundamentally, USAFA disagrees that stormwater from the proposed Urban Landscape project will be discharged into Jackson Creek. Based on our review of maps and the site itself, the stormwater will be discharged into an unnamed intermittent streambed between Jackson Creek and Black Forest Creek, which will eventually discharge directly to Monument Creek. Historically, this intermittent streambed rarely receives sufficient volume of stormwater runoff to discharge into Monument Creek. Unfortunately, this proposed development will drastically increase the volume of water into this unnamed intermittent stream channel. This increased volume will significantly change the hydrology of the area and cause moderate to severe damage to neighboring properties, including USAFA's property, before discharging into Monument Creek. Examples of possible damage from elevated water volumes include, but are not limited to, headwall cutting, disconnecting the

streambed from the floodplain, increased sediment transport and the destruction of a threatened species' vital habitat.

Once the stormwater from the proposed development leaves the property, it will travel through multiple properties and jurisdictions before reaching Monument Creek. From the Urban Landing property, the stormwater will cross under I-25, Colorado Department of Transportation controlled land, the Falcon Commerce Center property in the Town of Monument, over El Paso County Parks Department's Santa Fe Trail, onto the United States Air Force Academy's property, under the Union Pacific/BNSF's rail tracks and land. The water then goes back onto USAFA's land and drains into a wetland that is prime habitat for the federally protected Preble's Meadow Jumping Mouse, before emptying into the already-incised Monument Creek, which is also protected habitat for the threatened Mouse. No part of this intermittent streambed is prepared for the additional volume of water that will come from the proposed development.

Also, importantly, there will likely be substantial impacts on USAFA and other nearby properties from simultaneous and cumulative development. In addition to stormwater discharges from the proposed Urban Landing, the stormwater outfall from Big-R, an existing retail store with a large amount of impervious paved surfaces, and part of the outfall from the newly proposed Cathedral Rock Church development (File No. PPR2436), will be included in the overall new volume of stormwater to this historically intermittent creek. These new flows will likely overwhelm the natural streambed and erode the neighboring properties. Additionally, the detention pond servicing the Big-R property is currently failing. The northeast corner of the detention pond has severe erosion which is filling the detention area with sediment. A visual inspection has revealed that attempts to repair the detention pond have failed and either surface flows or groundwater flows may be undermining these repairs. The sediment released in this detention pond will flow under the highway and into the same intermittent creek that Urban Landing feeds into, thus further degrading it.

It is imperative that downstream property owners and stakeholders are included in all development reviews, as these developments will directly impact their properties. A recent conversation with the Falcon Commerce Center engineer revealed that they were not familiar with the two proposed projects (Urban Landing and Cathedral Rock Church) that would likely increase the overall volume of stormwater onto the Falcon Commerce Center property.

Per the Urban Landing's Preliminary Drainage Report, there are no proposed improvements outside of its property boundary. According to the County's Stormwater Drainage Criteria Manual Volume 2, Chapter 4.1, step two of the Four-Step process discusses stabilization of natural drainages adjacent to new development. Downstream properties should not have to bear the burden of additional water volume and associated adverse impacts (increased sediment deposition, riparian habitat degradation, head-cutting, disconnection to the floodplain, increased safety concerns, etc.) on their properties from upstream development. Additionally, the cost of rehabilitating impacted riparian habitat that hosts a threatened species will necessitate significantly more mitigation than is currently addressed in the original design plan. Repairing stormwater-damaged streams on USAFA since 2007, has cost \$15 million, which equates to approximately \$1 million per acre to restore Preble's Meadow Jumping Mouse habitat.

Therefore, USAFA requests that the County consider the following:

- Notify all downstream property owners and jurisdictions (listed above) and request that they comment once an updated drainage report is available.
- Request that the developer address all flow rates and volumes on the property consistent with Drainage Criteria Manual Volume 1 and stabilize downstream waterways.
- Attend a site visit with USAFA staff to see and discuss the proposed development area.

Finally, with respect to overflight and noise, flights from the Davis Airfield routinely operate directly over and within a mile radius of this proposed site and fly as low as 800 feet above ground level. Therefore, we request that the County ask the property owner/developer to:

- Include an avigation easement on the plat. This will help ensure continued success of the Academy's airmanship program, which trains future pilots for the Air Force.
- Include the following note on final plats and lease agreements, as applicable, to provide full disclosure of nearby training operations at future time of sale or lease:

***Notice:** This property may be impacted by noise and other similar sensory effects of flight caused by aircraft during daily activities from the United States Air Force Academy's Airmanship Program and aerial special events. This notice shall remain in effect until the Air Force Academy shall cease to be used for flight training purposes and aerial special events, or until all airports on the Air Force Academy shall cease to be actively used. This notice shall run in perpetuity with the land.*

Please indicate if the applicant will include the easement and noise statement.

Thank you for the opportunity to review and comment. If you have any questions, please contact our Community Planner, Mr. Matthew Fitzsimmons, 10 CES/CENPP, Matthew.Fitzsimmons.4.ctr@us.af.mil and 10ces.cenp.usafadevreviewgrp@us.af.mil.

Sincerely

ERIN M. MANNING, GS-14, USAF