



DEVELOPMENT & REDEVELOPMENT - PLANNING & DESIGN

ENVIRONMENTAL GUIDELINE



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PURPOSE

The purpose of this guideline is to provide guidance on DEN's expectations for planning and design activities to mitigate environmental impacts and promote environmental stewardship throughout the project life cycle. This supports the federal requirement for NEPA documentation for certain projects, the citywide requirement for all city buildings to be built to LEED Gold, and DEN's commitment for projects with a budget over \$1M to complete an Envision Self-Assessment, water resource and wetlands permitting, among other compliance obligations.

ACTIVITY DESCRIPTION

This guideline covers all new development, redevelopment, and expansion projects at DEN, including Capital Improvement Program (CIP), tenant, and maintenance projects. For each of these, environmental issues must be considered during the planning and design phases to identify and mitigate potential environmental impacts, leverage environmental opportunities, minimize potential regulatory liabilities, obtain federal funding, prevent increases to project cost, and prevent delays to project schedule. All DEN contracts and leases require compliance with federal, state, and local environmental laws, regulations, and permits, and adherence to DEN rules and regulations. The requirements of DEN's EMS are contained in Rule and Reg 180. Environmental requirements are also contained in DEN Design Standards, specifically the Sustainability Design Standards Manual which details requirements for green building and infrastructure frameworks, such as Leadership in Energy and Environmental Design (LEED) and Envision. In some circumstances for very large projects, specific environmental requirements will be included in contracts for the Program Management Team, or designer, or construction contractor, such as DEN's Expectations for NEPA, LEED, and Envision.

EXPECTATIONS

Best Practices:

- The following steps shall be followed so that environmental compliance obligations are identified early in the planning process:
- DEN Project Manager completes and submits a Project Environmental Review Form to Environmental Services. This should be completed once the project scope is understood and project planning is sufficiently mature to inform the Environmental Project Review. Generally, this is after the scope has been developed, design has been funded and is at the beginning of the design phase. However, there are circumstances where Environmental and Sustainability requirements need to be identified earlier, so that adequate detail and funding can be included in the design scope of work, or that more time-consuming environmental reviews, such as NEPA EA or EIS, can be completed early in the project life cycle. In those



circumstances, the DEN PM, or if not yet assigned, a DEN contact leading the planning phase of the project should submit the Project Environmental Review form at the point that an early determination is needed and then submit a supplemental Project Environmental Review form again at the point design is funded and being initiated.

- Environmental SME will use the Review Form to complete the Environmental and Sustainability Checklist for Facility Development and Redevelopment (Checklist) to determine environmental compliance obligations for the project
- The Checklist is sent back to the DEN project manager (for tenant and other third-party projects, the DEN project manager shares it with the project sponsor)
 - If a project requires NEPA, the appropriate level is determined. Note that the following conceptual/preliminary engineering information is typically required to complete NEPA:
 - Conceptual Grading and Drainage Plans, including the limit of construction and limit of disturbance inclusive of erosion and sediment control and stormwater management requirements.
 - Location of borrow and stockpile areas.
 - Change in the amount of impervious surface for the project, and any alternatives being evaluated under NEPA.
 - Concepts for stormwater quantity management including estimates of runoff volumes. This includes any conceptual/preliminary design reports completed to identify sizing of detention and water quality control for stormwater management.
 - Utilities upgrades and utility corridors to support proposed improvements.
 - All connected and enabling projects needed for implementation of the project and any alternatives (e.g., NAVAIDs, deice pads, service roads, related buildings, etc.).
 - Requirements for site access, temporary construction, and staging areas.
 - Type and quantity of solid waste that would be generated by construction for the project and any alternatives
 - Order of magnitude costs.
 - High-level construction schedules for use in developing air pollutant emissions; and
 - Construction equipment types and activity levels derived from project design data and generated by ACEIT are often generated by the Environmental SME and are reviewed by the design consultant for accuracy in relation to earth moving and excavation activities and quantities.
 - The DEN PM should plan for these general timelines that are needed to complete NEPA. Note that the timelines begin when the necessary conceptual/preliminary engineering information is available and a consultant contract (where needed) is in place. The Sustainability Division maintains on-call consultant contracts adequate to complete NEPA CATEXs, and written re-evaluations, but a new dedicated contract may be needed for an EA or EIS.
 - Categorical Exclusion (CATEX) Memo – done annually by FAA,



- Documented CATEX – 90-120 days,
- Environmental Assessment – 1-3 years,
- Environmental Impact Statement (EIS) – 2-4 years, and
- Written Re-Evaluation – 90-120 days.
- The DEN Project Manager is responsible for ensuring that all environmental permits and approvals are obtained prior to work commencement. Pursuant to Technical Specification 015719, these permits and approvals should be incorporated into contracts as required submittals.
 - Environmental SME will attend project meetings as needed for each project to provide input, assist in interpretation of requirements, and prepare documentation as deemed necessary in the Checklist
- Each airport tenant, contractor, or operator conducting planning and design activities is responsible for understanding the applicable regulations and managing their activities accordingly. This Environmental Guideline is meant as guidance only and does not supersede any regulations.
- All DEN Project Managers, tenant Project Managers, and Management Representatives for Operational Partners should be familiar with the process above.
- DEN Project Manager should retain a record of the Environmental Project Review Form and the complete Checklist for their records.
- DEN Project Manager maintains permits, licenses, and certifications for the project and should provide copies of those materials and correspondence to the Environmental SME.
- Environmental SMEs should also save these to the Sustainability Division Records Library

Shall Not:

- Commence work without securing proper approvals and permits.
- Separation of projects or NEPA "Connected Actions" (the division of a larger project into tasks, phases, or "enabling projects") should be avoided with regards to environmental planning. This practice is not lawful for federally funded projects and is not recommended for other projects. Separation of connected actions can lead to delays and errors in the environmental approval process, and lead to schedule delays and cost increases.
- Delay providing project information to Environmental Services because some approvals and/or permits may require long lead time, and early identification of these issues by the DEN Project Manager and the Environmental SME can help secure approvals and/or permits in a timely manner.
- Avoid providing project information to Environmental Services which may lead to non-compliance with regulatory frameworks or misalignment with DEN's EMS. This may also result in delays or inability to obtain funding, negative press for the airport, legal actions, and missed opportunities for positive environmental sustainability outcomes.

REFERENCES

Contacts



- DEN Environmental Services (Main Line): 303-342-2730; DENEnvironmental@flydenver.com

Additional Resources

- FAA Order 1050.1G and associated Desk Reference (FAA, 1050.1 Desk Reference)
- FAA Advisory Circulars if applicable
- FAA October 3, 2024 Memorandum “Initial Instructions to Airports District Offices and Regional Office of Airports Employees Regarding Airport Layout Plan Reviews and Projects Potentially Affected by the FAA Reauthorization Act of 2024”
- CDPS MS4 Permit (Permit No. COS000001, Part I.B.1.a.2)
- City and County of Denver Sanitary Sewer Design Technical Manual
- City and County of Denver Storm Drainage Design & Technical Criteria
- UDFCD Urban Storm Drainage Criteria Manual – Volume 3
- DEN Rule & Regulation 180
- DEN Technical Specifications – Sections 015719, 017419, 017420
- DEN Design Standards Manuals
- FAA ARP SOP No. 5.2 Documented CATEX Form (Effective Date 3/31/2025)