



**DEPARTMENT OF THE AIR FORCE  
UNITED STATES SPACE FORCE  
SPACE BASE DELTA 1**

26 July 2025

Douglas S. Kelley, Lt Col, USAF  
Commander  
21 Civil Engineer Squadron  
580 Goodfellow St.  
Peterson SFB, CO 80914

Drew Foxx  
City of Colorado Springs  
Land Use Review  
30 S. Nevada Ave.  
Colorado Springs, CO 80903

Dear Mr. Foxx,

Thank you for notifying Peterson Space Force Base of the City's review of the Landings Business Park Land Use Plan and Zoning Application (LUPL-25-0011 & ZONE-25-0024). We appreciate the opportunity to provide comments in accordance with Colorado Revised Statute 29 20 105.6(3), which recognizes the importance of military input for development proposals within two miles of an installation boundary.

As a vital part of the Pikes Peak community, Space Base Delta 1 is committed to building strong partnerships that support both national defense and regional prosperity. Peterson Space Force Base, along with Cheyenne Mountain Space Force Station, forms the cornerstone of U.S. space operations. These installations were strategically located to leverage unique geographic advantages such as horizon-to-horizon satellite tracking, minimal electromagnetic interference, separation from dense urban development, and the ability to support future Department of Defense space missions.

We have reviewed the proposed Landings Business Park project and respectfully submit the following concerns for consideration:

**1. Proximity to the Base Security Zone and Mission Sensitivities**

The proposed development lies within the Base Security Zone, a quarter mile standoff area surrounding the Peterson SFB perimeter that is vulnerable to surveillance, indirect fire threats, and physical encroachment. This zone is critical for antiterrorism and mission assurance. Introducing high density residential and industrial uses in such proximity increases potential risks to our facilities and operations.

**2. Operational Security Risks**

Proposed building heights, including structures up to 120 feet tall, may create elevated lines

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of sight into secure areas such as the Electromagnetic Warfare compound. This increases the risk of hostile surveillance and pattern of life analysis. Certain proposed land uses, including live work and multi-tenant offices, further complicate efforts to maintain a secure and controlled operational environment.

### 3. Force Protection and Infrastructure Impacts

The development anticipates up to 2,000 residential dwelling units and approximately 230-acres of commercial and industrial space, significantly increasing the surrounding civilian population. This presents challenges related to access control and increases the need for infrastructure coordination. Of particular concern is potential strain on shared utility systems such as power supply, which are critical for emerging mission requirements on the east side of base.

### 4. Transportation and Access Conflicts

The Traffic Impact Study identifies significant increases in vehicle volumes on Marksheffel Road, a primary access corridor for the Peterson SFB East Gate. While proposed intersections and improvements meet city standards, we ask that the city coordinate closely with installation planners to ensure uninterrupted gate operations and mitigate any force protection concerns related to increased traffic near sensitive areas.

### 5. Absence of Buffer Zones or Transition Uses

The proposed plan does not include any buffer or transitional land uses to mitigate impacts between the development and the base. Similar off-base development scenarios have demonstrated that the absence of physical or policy buffers can lead to long term land use conflicts and operational restrictions. We strongly encourage the city to consider standoff distances, design guidelines, or easements to protect installation boundaries.

Peterson SFB recognizes and supports responsible regional growth. Our intent is not to obstruct economic progress but to ensure it is aligned with mission compatibility and long-term national security interests. These installations were not placed in the Pikes Peak Region by coincidence. They are here for critical reasons, and our collective responsibility is to preserve their operational viability.

The missions housed at Space Base Delta 1 are sensitive to factors such as radio frequency interference, line of sight obstruction, incompatible zoning, and environmental impacts. If left unaddressed, such risks can degrade operational effectiveness and jeopardize national defense.

As we look to the future, growth in the Pikes Peak Region must be matched by proactive collaboration, early engagement, and thoughtful planning. We are committed to working closely with the City of Colorado Springs and local stakeholders to ensure development near our installations supports both military readiness and community wellbeing.

Thank you for the opportunity to review and comment. Peterson SFB endeavors to partner and work toward development that is compatible development that neither creates public safety issues nor negatively impacts military operations. If you have any questions, please contact our Community Planner, Ms. Beth Dukes, at (719) 556-1708, [elizabeth.dukes.4@spaceforce.mil](mailto:elizabeth.dukes.4@spaceforce.mil).

**SEMPER VENATOR**

Sincerely

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DOUGLAS S. KELLEY, Lt Col, USAF  
Commander

Attachments:

Tab 2\_General Application Form

Tab 3\_Land Use Plan

Tab 4\_Project Statement

Tab 5\_Traffic Impact Study

Tab 6\_Mineral Rights Cert

Tab 7\_Statement of Authority Signed



**DEPARTMENT OF THE AIR FORCE  
UNITED STATES SPACE FORCE  
SPACE BASE DELTA 1**

24 September 2025

Douglas S. Kelley, Lt Col, USAF  
Commander  
21 Civil Engineer Squadron  
580 Goodfellow St.  
Peterson SFB, CO 80914

Drew Foxx  
City of Colorado Springs  
Land Use Review  
30 S. Nevada Ave.  
Colorado Springs, CO 80903

Dear Mr. Foxx,

Thank you for notifying Peterson Space Force Base (SFB) of the resubmittal of the Landings Business Park Land Use Plan and Zoning Application (LUPL-25-0011 & ZONE-25-0024). We appreciate the opportunity to provide comments in accordance with Colorado Revised Statute 29-20-105.6(3), which requires military installations be consulted for development proposals within two miles of an installation boundary.

We have reviewed the resubmittal of Landings Business Park development and respectfully submit the following concerns for consideration:

**1. Base Security Zone (One-Quarter Mile Buffer)**

Peterson SFB appreciates the developer adding a one-quarter mile buffer along the installation perimeter to support base security, antiterrorism, and force protection. However, the Land Use Plan continues to depict residential development within this buffer, which undermines its purpose. Residential uses in this zone increase risks of surveillance, line-of-sight exposure, and standoff threats such as rockets, mortars, or man-portable air defense systems. To maintain the buffer's intent as a base security zone, Peterson SFB requests confirmation that development will not be permitted within the one-quarter mile buffer.

**2. Operational Security Risks**

The resubmittal indicates maximum building heights of fifty feet for residential and eighty feet for commercial uses. Structures of this scale may overlook sensitive operational areas, including electromagnetic warfare facilities, and increase risks of hostile surveillance and operational security concerns. These risks complicate efforts to maintain a secure and controlled environment and may affect long-term mission assurance.

### 3. Frequency Interference

On the east side of Peterson SFB, there are multiple antennas that download data from satellites to support critical missions. Development near these assets could introduce frequency interference, which may disrupt operations. This risk should be carefully evaluated and monitored if construction proceeds.

### 4. Wildlife and Aviation Hazards

The proposed detention ponds raise safety of flight concerns, as areas such as these often attract birds and waterfowl. With their proximity to active flying and taxi areas, these features could significantly increase the risk of bird-aircraft strikes for both Peterson SFB and Colorado Springs Airport. The proposed neighborhood park and landscaped open space may also attract nesting birds, small mammals, and predators such as coyotes and raptors. In addition, residential areas with solar panels may increase pigeon populations, which are already a nuisance and a strike hazard on the installation.

### 5. Tribal Consultation

During Peterson SFB's annual consultation with federally recognized tribes, Tribal Historic Preservation Officers expressed concern that the landowner has not entered into Section 106 consultation in accordance with the National Historic Preservation Act. This requires a Traditional Cultural Properties Survey by a Tribal Survey Specialist and consultation agreements with each affected tribe. Failure to comply could result in litigation against the City of Colorado Springs and the developer. Peterson SFB can provide tribal points of contact if requested.

Peterson SFB supports compatible regional growth. Our priority is to ensure development near the installation remains aligned with mission assurance, antiterrorism, and long-term national security interests. We remain committed to working closely with the City of Colorado Springs and local stakeholders that development supports both military readiness and community wellbeing.

If you have any questions, please contact our Community Planner, Ms. Beth Dukes, at (719) 556-1708 and/or [elizabeth.dukes.4@spaceforce.mil](mailto:elizabeth.dukes.4@spaceforce.mil).

Sincerely,



DOUGLAS S. KELLEY, Lt Col, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
UNITED STATES SPACE FORCE  
SPACE BASE DELTA 1**

25 November 2025

Douglas S. Kelley, Lt Col, USAF  
Commander  
21 Civil Engineer Squadron  
580 Goodfellow St.  
Peterson SFB, CO 80914

Colorado Springs Planning Department  
City of Colorado Springs  
Land Use Review  
30 S. Nevada Ave.  
Colorado Springs, CO 80903

Dear Colorado Springs Planning Department,

Thank you for notifying Peterson Space Force Base (SFB) of the third resubmittal of the Landings Business Park Land Use Plan and Zoning Application (LUPL-25-0011 & ZONE-25-0024). We appreciate the opportunity to provide comments in accordance with Colorado Revised Statute 29-20-105.6(3), which requires military installations be consulted for development proposals within two miles of an installation boundary.

Peterson SFB has reviewed the resubmittal of Landings Business Park development, and while we acknowledge the administrative updates, our concerns remain unchanged from previous comment letters dated 26 July 2025 and 24 September 2025. The following items represent new comments identified in the latest submittal:

**1. Base Security Zone (One-Quarter Mile Buffer)**

We acknowledge the city's clarification that the one-quarter mile buffer depicted on the Land Use Plan is not intended as a no-build zone. Mission Partners request clarification regarding what distance, if any, the city considers an appropriate no-build or restricted-use setback from Peterson SFB boundary. Residential use within this zone continues to pose risks related to surveillance, line-of-sight exposure, and standoff for threats such as rockets, mortars, or manned-portable air defense systems.

**2. Stormwater and Potential PFAS Concerns**

U.S. Geological Survey (USGS) topographic information indicates a high likelihood of stormwater flowing toward Peterson SFB. With natural infiltration reduced by approximately 80-90% due to impervious surfaces, runoff volumes toward the installation are expected to increase. Expanded residential use also raises the potential for Per-and Polyfluoroalkyl Substances (PFAS) contaminated stormwater entering the installation's drainage system and affecting National Pollutant Discharge Elimination System (NPDES) compliance.

**3. Air Quality Requirements**

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The Traffic Impact Study does not include the air emission estimates required under Clean Air Act Section 176(c). Within the Land Use Plan, no air conformity analysis has been provided to evaluate increased emissions or potential impacts to National Ambient Air Quality Standards (NAAQS) from fuel-combustion sources, including residential, commercial, industrial and transportation sources. These analyses are required under the General Conformity Rule of the Clean Air Act and the Colorado State Implementation Plan.

#### 4. Native American Consultation

During the September 2025 Annual SBD 1/Tribal Consultation meeting, the 32 affiliated tribes expressed concern that no Tribal Consultation has been performed in the Colorado Springs area as required by National Historic Preservation Act. 21 CES was asked to convey this discrepancy when reviewing off-base development projects.

Peterson SFB supports compatible regional growth. Our priority is to ensure development near the installation remains aligned with mission assurance, antiterrorism, and long-term national security interests. We remain committed to working closely with the City of Colorado Springs and local stakeholders that development supports both military readiness and community wellbeing.

If you have any questions, please contact our Community Planner, Ms. Beth Dukes, at (719) 556-1708 and/or [elizabeth.dukes.4@spaceforce.mil](mailto:elizabeth.dukes.4@spaceforce.mil).

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DOUGLAS S. KELLEY, Lt Col, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
UNITED STATES SPACE FORCE  
SPACE BASE DELTA 1**

12 January 2026

Douglas S. Kelley, Lt Col, USAF  
Commander  
21 Civil Engineer Squadron  
580 Goodfellow St.  
Peterson SFB, CO 80914

Colorado Springs Planning Department  
City of Colorado Springs  
Land Use Review  
30 S. Nevada Ave.  
Colorado Springs, CO 80903

Dear Colorado Springs Planning Department,

Thank you for notifying Peterson Space Force Base (SFB) of the fourth resubmittal of the Landings Business Park Land Use Plan and Zoning Application (LUPL-25-0011 & ZONE-25-0024). We appreciate the opportunity to provide comments in accordance with Colorado Revised Statute 29-20-105.6(3), which requires military installations be consulted for development proposals within two miles of an installation boundary.

This letter consolidates the comments provided by Peterson SFB in correspondence dated 26 July, 24 September, and 25 November 2025. We respectfully request that these concerns be considered as part of the City's review of the fourth submittal for the Landings Business Park development.

Our primary objective is to ensure development adjacent to the installation remains compatible with mission assurance, antiterrorism, and long-term national security interests. While we acknowledge administrative updates in the latest submittal, several key concerns remain.

**1. Base Security Zone (One-Quarter Mile Buffer)**

Mission partners, including Mission Delta 3, continue to express concerns regarding the lack of an agreed-upon setback from the Electronic Warfare (EW) Compound. We continue to request a minimum one-quarter mile standoff, where feasible. While we recognize this distance may not be achievable in all cases, the underlying concern remains to reduce the risk of surveillance targeting service members and sensitive operations.

**2. Operational Security Risks**

Proposed building heights of up to 50 feet for residential uses and 80 feet for non-residential uses may allow structures to overlook sensitive operational areas, including electromagnetic warfare facilities. These conditions increase the risk of hostile surveillance and complicate efforts to maintain a secure and controlled operational environment, potentially affecting long-

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term mission assurance.

### 3. Frequency Interference

On the east side of Peterson SFB, there are multiple antennas that download data from satellites to support critical missions. Development near these assets could introduce frequency interference, which may disrupt operations. This risk should be carefully evaluated and monitored if construction proceeds.

### 4. Traffic Impact

Traffic impacts remain a concern due to the project's proximity to the Peterson SFB East Gate and its reliance on Marksheffel Road as a primary access corridor. The Traffic Impact Study projects approximately 28,663 daily vehicle trips, with peak periods adding roughly 5,063 trips, and forecasts total Marksheffel Road volumes of 30,000–35,000 vehicles per day at buildout. While roadway improvements are proposed, the study does not sufficiently evaluate queueing or congestion impacts near the East Gate. Increased traffic near a sensitive military access point could delay mission-essential personnel and create force protection vulnerabilities. Continued coordination is requested to ensure gate operations are not adversely affected.

### 5. Stormwater and Potential PFAS Concerns

U.S. Geological Survey (USGS) topographic information indicates a high likelihood of stormwater flowing toward Peterson SFB. With natural infiltration reduced by approximately 80-90% due to impervious surfaces, runoff volumes toward the installation are expected to increase. Expanded residential use also raises the potential for Per- and Polyfluoroalkyl Substances (PFAS) contaminated stormwater entering the installation's drainage system and affecting National Pollutant Discharge Elimination System (NPDES) compliance.

### 6. Wildlife and Aviation Hazards

Proposed detention ponds, landscaped open spaces, and park areas may attract waterfowl and other wildlife. Given the proximity to active runways and taxiways for both Peterson SFB and Colorado Springs Airport, these features could increase the risk of bird-aircraft strike hazards and should be carefully evaluated and mitigated.

### 7. Air Quality Requirements

The Traffic Impact Study does not include the air emission estimates required under Clean Air Act Section 176(c). Within the Land Use Plan, no air conformity analysis has been provided to evaluate increased emissions or potential impacts to National Ambient Air Quality Standards (NAAQS) from fuel-combustion sources, including residential, commercial, industrial and transportation sources. These analyses are required under the General Conformity Rule of the Clean Air Act and the Colorado State Implementation Plan.

Peterson SFB supports compatible regional growth. Our priority is to ensure development near the installation remains aligned with mission assurance, antiterrorism, and long-term national security interests. We remain committed to working closely with the City of Colorado Springs and local stakeholders that development supports both military readiness and community wellbeing.

If you have any questions, please contact our Community Planner, Ms. Beth Dukes, at (719) 556-1708 and/or [elizabeth.dukes.4@spaceforce.mil](mailto:elizabeth.dukes.4@spaceforce.mil).

Sincerely,

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DOUGLAS S. KELLEY, Lt Col, USAF  
Commander

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