

EXECUTIVE SUMMARY

The Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) propose improvements to the Interstate 25 (I-25) Corridor from just south of United States Highway 50 (US 50)/State Highway (SH) 47 (milepost 101) to just south of Pueblo Boulevard (milepost 94) in Pueblo, Colorado, a distance of approximately 7 miles. The project area is shown in **Exhibit ES-1** and **Exhibit ES-2**. I-25 through the City of Pueblo (City) is an aging facility that was constructed between 1949 and 1959. The highway engineers at that time designed the freeway to serve transportation needs through the year 1975.

I-25 serves as a critical north-south link in the nation's Interstate Highway System and as a strategic international corridor under the North American Free Trade Act (NAFTA). The segment of I-25 that passes through Pueblo serves interstate travel, regional travel, local trips (trips with origins and destinations within Pueblo), and freight traffic.

A study of I-25 through Pueblo was initiated in 2000 by FHWA and CDOT. The study process analyzed transportation conditions and identified transportation needs in the corridor. Through an active public participation program, community values were captured in a Community Vision statement (see **Chapter 1 – Purpose and Need**) that asks FHWA and CDOT to respect the traditions and trends of the Pueblo community as they develop solutions to roadway problems. The culmination of this effort is called the New Pueblo Freeway project.

The National Environmental Policy Act of 1969 (NEPA) requires that projects that receive federal funding and may have an environmental impact be analyzed through a rigorous process that allows the public to review and comment on the project. Federal agencies are required by NEPA to prepare an Environmental Impact Statement (EIS) for major federal projects that have the potential to significantly affect the quality of the human and natural environment. This Draft EIS (DEIS) is a joint effort between CDOT and FHWA.

The intent of the New Pueblo Freeway EIS is to identify highway improvements along I-25 through Pueblo and to comply with the policies and procedures under NEPA. Specifically, this DEIS:

- ❖ Analyzes alternatives that meet the project Purpose and Need;
- ❖ Details the process through which highway improvement alternatives were developed;
- ❖ Discloses foreseeable social, economic, and environmental impacts resulting from the project;
- ❖ Provides findings for public review; and
- ❖ Outlines mitigation measures to minimize project impacts.

The Modified I-25 Alternative has been preliminarily identified as the Preferred Alternative in the DEIS. Final identification of the Preferred Alternative will not be made until after public and agency comments on the DEIS have been considered.

This DEIS is available for review and comment by interested parties, including state and federal agencies, citizens, and elected officials. During the DEIS review period (45 days), a public hearing will be held and comments will be recorded.

PURPOSE AND NEED

The purpose of the New Pueblo Freeway project is to:

- 1) improve safety by addressing deteriorating roadways and bridges and unsafe road characteristics on I-25; and
- 2) improve local and regional mobility within and through the City to meet existing and future travel demands. The need for the project results from the highway's age and the design practices at the time it was built, which has led to the following issues:

- ❖ **Safety problems:** I-25 through Pueblo has high accident rates that exceed state averages, segments with narrow lanes, areas where shoulders are too narrow to safely accommodate a broken-down vehicle, on and off ramps with inadequate lengths to maneuver vehicles, and inadequate spacing of interchanges for drivers to safely merge into highway traffic.
- ❖ **Mobility problems:** I-25 through Pueblo has interchanges that do not connect to appropriate city streets (e.g., connect to local neighborhood streets instead of major cross streets), a lack of alternative routes for north-south and east-west connectivity, areas of reduced speed, insufficient capacity for projected traffic forecasts and poor levels of service, aging bridges with inadequate bridge sufficiency ratings, and conflicts with local and regional travel.

EXHIBIT ES-1
Project Vicinity Map

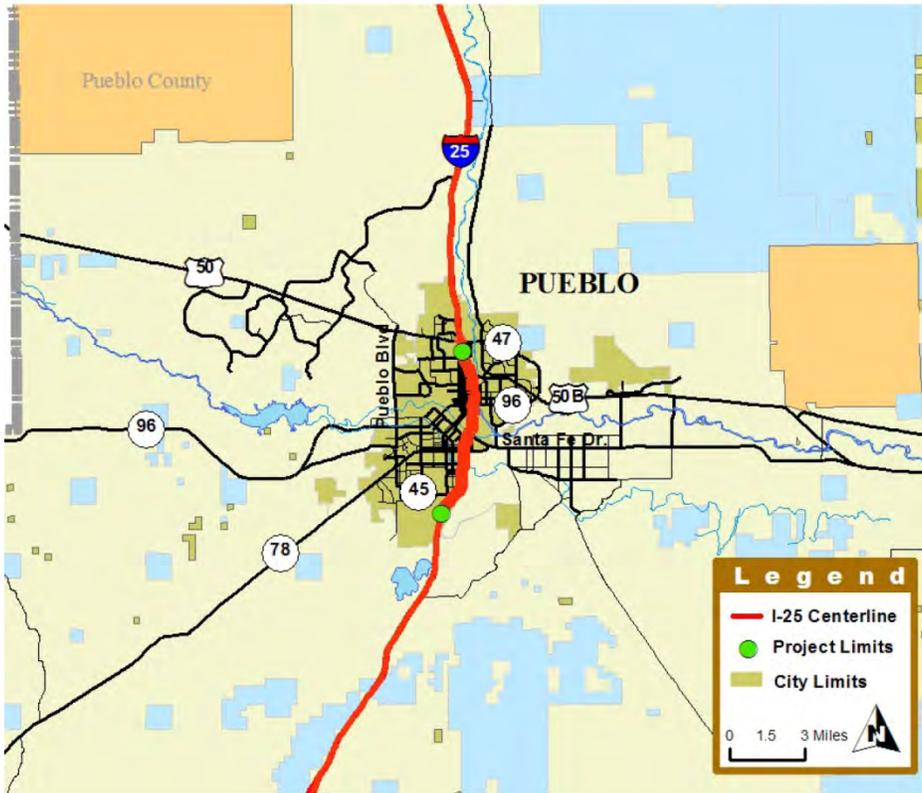
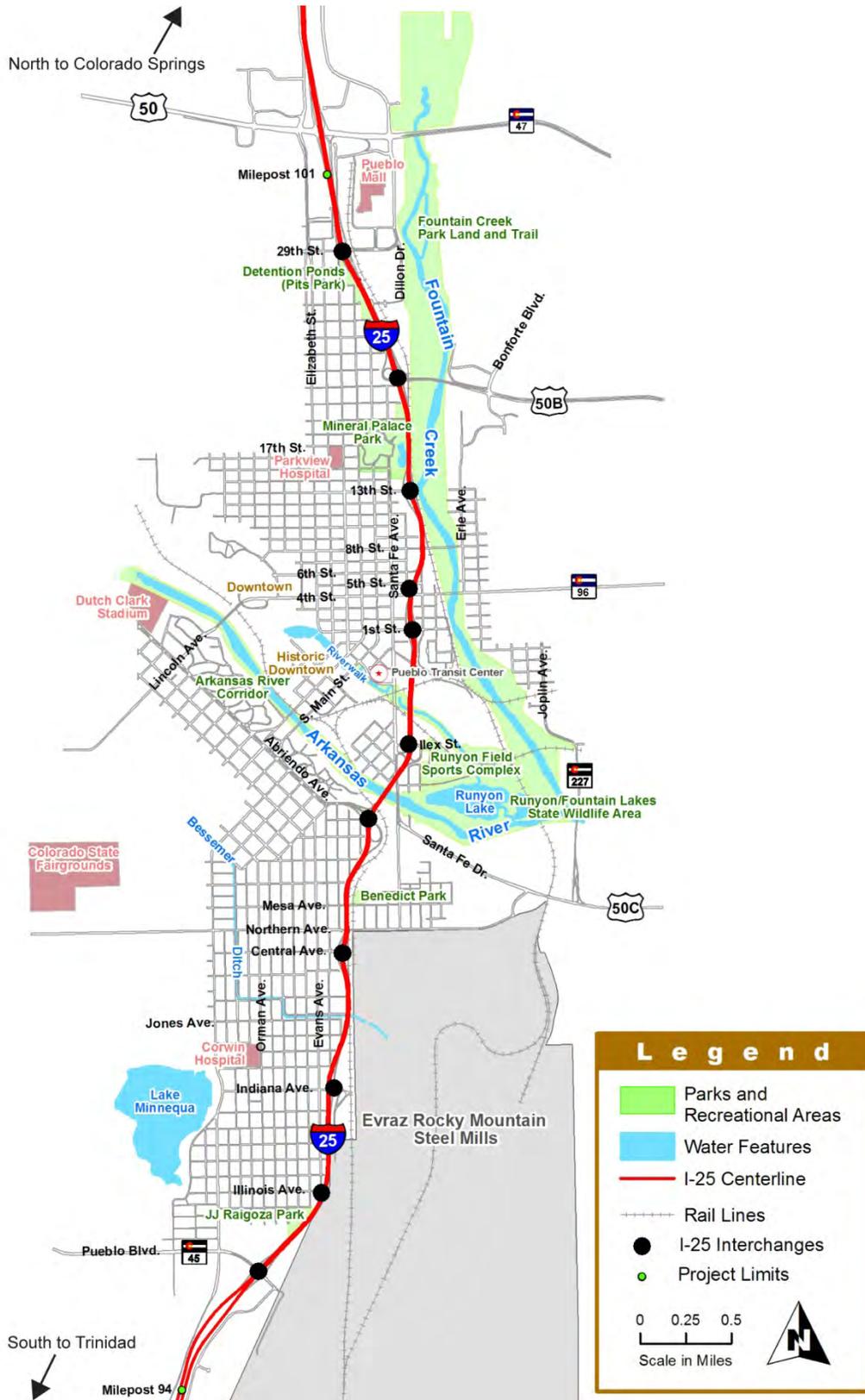


EXHIBIT ES-2
Project Study Area



ALTERNATIVES CONSIDERED

CDOT recognized that the decision for improvements to I-25 through Pueblo would require a multi-disciplinary approach to developing alternatives that would involve a team of transportation and highway design professionals/engineers, environmental managers, public involvement specialists, and a wide range of community stakeholders with an interest in the outcome of the project. To implement this approach, representatives from FHWA and CDOT joined a consultant team of professionals in a variety of disciplines to form the CDOT Project Team. These members are listed in **Chapter 7 – List of Preparers**. The CDOT Project Team followed the guidelines of the National Cooperative Highway Research Program (NCHRP) *Report 480, A Guide to Best Practices for Achieving Context Sensitive Solutions*, for studying improvements to I-25 through Pueblo (NCHRP, 2002). Using the process outlined in the Context Sensitive Solutions guidelines resulted in a Community Vision and transportation solutions that meet the Purpose and Need for the project, are sensitive to environmental and community resources, and reflect community values.

Developed through public participation, the Community Vision statement is an important element of the alternatives development process. Similar to the project's Purpose and Need, it summarizes the community's desire for a New Pueblo Freeway project that balances the needs of interstate, regional, and local trips; provides a safe, intuitive highway facility; and re-establishes east-west access through Pueblo. The Community Vision Statement, while not used for alternatives screening, was used to assist in the design of project alternatives. Further discussion of the Community Vision is presented in **Chapter 1 – Purpose and Need**.

To ensure a comprehensive and rigorous evaluation of possible transportation solutions, the CDOT Project Team used three levels of evaluation and screening: Evaluation and Screening of Ideas, Evaluation and Screening of Concepts, and Evaluation and Screening of Strategies. Guided by the Purpose and Need and the Community Vision, the CDOT Project Team and stakeholders developed criteria for evaluating project alternatives. The evaluation criteria were classified by four categories, which are described in more detail in **Chapter 2 – Alternatives**:

- ❖ Community Values
- ❖ Environmental Resources
- ❖ Mobility and Safety
- ❖ Implementation

Transportation solutions were assessed against the evaluation criteria developed for that step to evaluate the strengths and weaknesses of each solution. Solutions not meeting the Purpose and Need were either modified and taken to the next step of evaluation or discontinued from further evaluation.

Ideas that met the Purpose and Need were developed into concepts in the following categories:

- ❖ Bypasses around Pueblo
- ❖ Alternative Routes through Pueblo
- ❖ Transit (ability to implement public transit instead of highway alternatives)
- ❖ I-25 Improvement Concepts

Similar to screening of ideas, the concepts were evaluated using criteria developed from the Community Vision and screened using the Purpose and Need. Concepts were ranked by how well they met the Purpose and Need and evaluation criteria and were then packaged into six strategies that were further screened based on the project Purpose and Need.

Except for one build strategy, all strategies were eliminated from further study because they failed to meet the Purpose and Need. The results of this analysis led to the selection of Alternative Strategy 6: Improve I-25 with six lanes and provide a Low-Speed Loop. This strategy underwent further refinement by the CDOT Project Team and stakeholders and became one of the final Build Alternatives, referred to as the "Existing I-25 Alternative." The No Action Alternative was also retained because it serves as a baseline for comparison to the Build Alternatives.

Development of a second build alternative evolved from the Existing I-25 Alternative while the CDOT Project Team and stakeholders were in the process of conducting the analyses for alternative interchanges. This "new" build alternative, named the "Modified I-25 Alternative," is similar to the Existing I-25 Alternative; however, between Ilex Street and Indiana Avenue, the highway would move to a new alignment east of the current I-25. The Modified I-25

Alternative would result in not having to move the railroad adjacent to the Evraz Rocky Mountain Steel Mills and would have fewer impacts to the Bessemer Neighborhood. The Modified I-25 Alternative is preliminarily identified as the Preferred Alternative.

The following final alternatives were moved forward for detailed evaluation in the DEIS:

- ❖ No Action Alternative
- ❖ Existing I-25 Alternative
- ❖ Modified I-25 Alternative

The alternative development process is outlined in **Exhibit ES-3**.

No Action Alternative

A No Action Alternative is required under NEPA to compare against the action, or Build Alternatives. The No Action Alternative does not include any corridor-wide safety and local or regional mobility improvements beyond routine maintenance such as pavement overlays and restriping of the existing facility, as defined in the PACOG's financially constrained *Pueblo Area 2035 Long Range Transportation Plan* (PACOG, 2008), and eventually the replacement of deficient structures. As with the Build Alternatives, the No Action Alternative has undergone a thorough analysis to measure how well it meets the Purpose and Need and evaluation criteria for the New Pueblo Freeway. Analysis of the No Action Alternative enables decision-makers to compare the magnitude of the environmental effects of each of the Build Alternatives with the effects of not making any improvements to I-25 through Pueblo. The roadway, interchange, network, bicycle, and pedestrian features of the No Action Alternative are described and illustrated in **Exhibit ES-4**.

Existing I-25 Alternative

The Existing I-25 Alternative was the result of modifications and refinements to the strategy that would widen I-25 to six lanes. The alternative was developed by the CDOT Project Team and stakeholders during the alternative interchange analysis task. The roadway, interchange, network, bicycle, and pedestrian features of the Existing I-25 Alternative are described and illustrated in **Exhibit ES-5**.

To meet projected capacity needs, the Existing I-25 Alternative would widen I-25 to six lanes (three in each

direction) from just north of 29th Street to Pueblo Boulevard on its current alignment. As described in **Exhibit ES-5**, the Existing I-25 Alternative reconstructs the interchanges at US 50B, Indiana Avenue, and Pueblo Boulevard; provides access to 29th Street via a frontage road; and creates split-diamond interchanges between 13th Street and 1st Street and Abriendo Avenue and Northern Avenue.

The Existing I-25 Alternative would improve connectivity off of I-25 by extending Dillon Drive south from 26th Street to US 50B. It would also extend Abriendo Avenue across I-25 to Santa Fe Drive. This connection would provide improved access between the neighborhoods west and east of I-25.

Modified I-25 Alternative

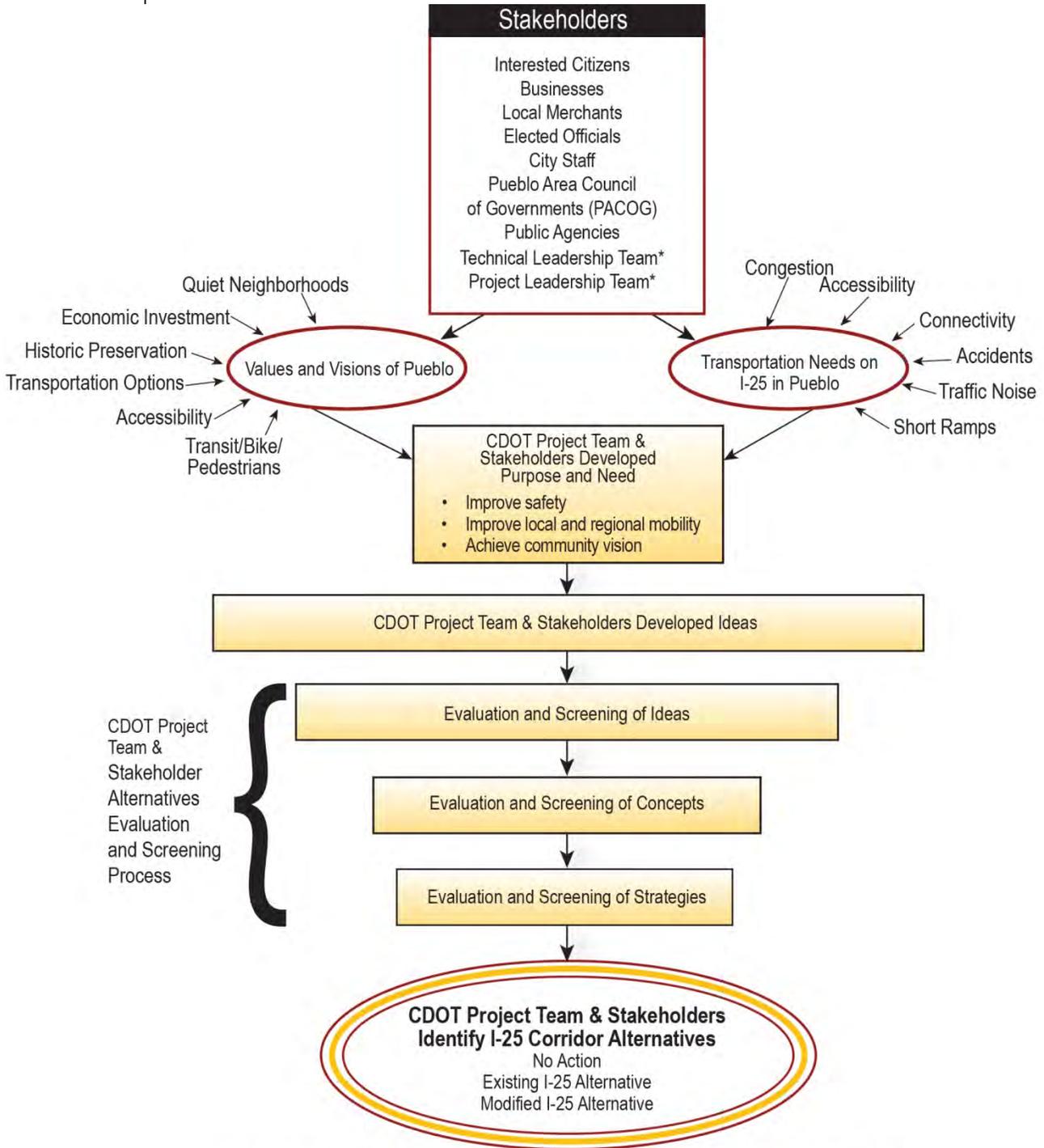
The Modified I-25 Alternative was developed by the CDOT Project Team and stakeholders from the Existing I-25 Alternative. It shares the design characteristics of the Existing I-25 Alternative, with the exception of one area of the corridor, which is described in the next paragraph. The roadway, interchange, network, bicycle, and pedestrian features of the Modified I-25 Alternative are illustrated and described in **Exhibit ES-6**.

In the southern part of the corridor between the Arkansas River and Canal Street, the Existing I-25 Alternative can be implemented only by moving the Union Pacific Railroad (UPRR) tracks 150 feet to the east to make room for widening I-25. As an alternative to moving the rail line, the Modified I-25 Alternative would relocate I-25 on a new alignment to the east at approximately Ilex Street, which would allow the UPRR rail line south of the Arkansas River to remain in place. With the Modified I-25 Alternative, I-25 would bridge over the railroad tracks at approximately Minnequa Avenue and then run on the west side of the tracks and rejoin the existing I-25 alignment.

By straightening I-25 at Ilex Street, I-25 would leave the current alignment and continue south. The roadway portion no longer used as I-25 would be available to become an extension of Santa Fe Avenue. This extension is a critical element to improving local mobility that is not possible under the Existing I-25 Alternative.

The Modified I-25 Alternative would extend Abriendo Avenue across I-25 to Santa Fe Drive. This connection would provide improved access between the neighborhoods west and east of I-25.

EXHIBIT ES-3
Alternative Development Process



*Participants on the Technical Leadership Team and Project Leadership Team are listed in Section 6.2.1 and 6.2.2 of the Comments and Coordination Chapter.

EXHIBIT ES-4
No Action Alternative

- I-25 Roadway Features**
- 4 existing lanes, 2 in each direction
 - Routine maintenance (pavement overlays, striping)

- Interchange Features**
- No improvements to interchanges

- Network Features**
- No improvements to network features

- Bicycle and Pedestrian Features**
- No bicycle or pedestrian improvements



EXHIBIT ES-5
Existing I-25 Alternative

I-25 Roadway Features

Six lanes (three in each direction) just north of 29th Street to Pueblo Boulevard

Standard shoulders and acceleration/ deceleration lanes

- 1 Straighten I-25 through downtown
- 2 Relocate UPRR

Interchange Features

- 3 Diamond interchange at US 50B with one-way frontage roads to 29th Street
- 4 Split-diamond interchange between 13th Street and 1st Street with one-way frontage roads between ramps; additional southbound and northbound exit ramps near 6th Street
- 5 Split-diamond interchange between Abriendo Avenue and Northern Avenue with one-way frontage roads connecting the ramps
- 6 Single-point diamond interchange at Indiana Avenue
- 7 Partial cloverleaf interchange at Pueblo Boulevard

Network Features

- 8 Extend Dillon Drive south from 26th Street to US 50B
- 9 Connect Abriendo Avenue and Santa Fe Drive (US 50C)

Bicycle and Pedestrian Features

- 10 Build sidewalks along Dillon Drive extension and US 50B bridge
- 11 Expand sidewalks on the Mesa Avenue overpass to connect Benedict Park to the west side of I-25
- 12 Build trail from just north of US 50B bridge to Mineral Palace Park
- 13 Construct a bike/pedestrian bridge between Mineral Palace Park and the Fountain Creek Trail
- 14 Build trail between Runyon Field and J.J. Raigoza Park

Other Features

Accommodates Circulator Bus System
Transportation Systems Management
Travel Demand Management
Intelligent Transportation Systems



*Detailed maps of the Existing I-25 Alternative are available in Appendix E.

EXHIBIT ES-6
Modified I-25 Alternative

I-25 Roadway Features

Six lanes (three in each direction) just north of 29th Street to Pueblo Boulevard
Standard shoulders and acceleration/deceleration lanes

- 1 Straighten I-25 through downtown
- 2 Relocate I-25 to the east between Abriendo Avenue to Indiana Avenue to eliminate relocation of the UPRR

Interchange Features

- 3 Diamond interchange at US 50B with one-way frontage roads to 29th Street
- 4 Split-diamond interchange between 13th Street and 1st Street with one-way frontage roads between ramps; additional southbound and northbound exit ramps near 6th Street
- 5 Split-diamond interchange between Abriendo and Northern Avenues with one-way frontage roads connecting the ramps
- 6 Single-point diamond interchange at Indiana Avenue
- 7 Partial cloverleaf interchange at Pueblo Boulevard

Network Features

- 8 Extend Dillon Drive south from 26th Street to US 50B
- 9 Connect Abriendo Avenue and Santa Fe Drive (US 50C)
- 10 Extend Santa Fe Avenue from Ilex Street to Minnequa Avenue
- 11 Rebuild Stanton Avenue south over the Arkansas River, intersect with Santa Fe Drive and connect to Santa Fe Avenue

Bicycle and Pedestrian Features

- 12 Build sidewalks along Dillon Drive extension and US 50B bridge
- 13 Expand sidewalks on the Mesa Avenue overpass to connect Benedict Park to the west side of I-25
- 14 Build sidewalks along Stanton Avenue to connect to the HARP trail and Benedict Park
- 15 Build trail from just north of US 50B bridge to Mineral Palace Park
- 16 Construct a bike/pedestrian bridge between Mineral Palace Park and the Fountain Creek trail
- 17 Build trail between Runyon Field and J.J. Raigoza park

Other Features

Accommodates Circulator Bus System
Transportation Systems Management (TSM)
Travel Demand Management (TDM) (By Others)
Intelligent Transportation Systems (ITS)



*Detailed maps of the Modified I-25 Alternative are available in Appendix E.

Bicycle and Pedestrian Accommodations for the Build Alternatives

The Community Vision for the New Pueblo Freeway charges the CDOT Project Team with finding a multi-modal and forward-looking solution. Extensive bicycle and pedestrian facilities are planned as a part of both Build Alternatives.

A consistent concern heard from the citizens of Pueblo was that I-25 acts as a barrier between neighborhoods, particularly for bicycles and pedestrians. Parks and open spaces are on the opposite side of the highway and are accessible only by car. Trails were discussed extensively during the neighborhood meetings to refine the Build Alternatives, and participants actively expressed the need for trails and sidewalks to reconnect neighborhoods, parks, and businesses.

Under both Build Alternatives, the completion of proposed trails and sidewalks would provide continuous bicycle and pedestrian access between 29th Street in the north to Pueblo Boulevard in the south. Residents would be able to access trails near their homes that would give families safe, non-motorized access to Mineral Palace Park, Benedict Park, JJ Raigoza Park, the Historic Arkansas Riverwalk of Pueblo, the Runyon Field Sports Complex, the Runyon Lake State Wildlife Area, and the Fountain Creek Trail system.

Preliminary Identification of a Preferred Alternative

FHWA and CDOT have preliminarily identified the Modified I-25 Alternative as the Preferred Alternative for improvements to I-25 through Pueblo because it better addresses the local and regional mobility problems identified in the project Purpose and Need. There is very little difference between the Existing I-25 Alternative and the Modified I-25 Alternative in terms of other factors considered, such as environmental impacts and cost. A comparison of impacts resulting from the No Action Alternative and the Build Alternatives is presented in **Exhibit ES-7** at the end of this chapter. Although the Modified I-25 Alternative impacts 0.88 acre more wetlands than the Existing I-25 Alternative, mitigation will replace the functional values of these wetlands on an equal basis. In December 2010, the U.S. Army Corps of Engineers concurred that the Modified I-25 Alternative is the least environmentally damaging practicable alternative (LEDPA)

for detailed evaluation (see **Appendix B**). The Modified I-25 Alternative, with the proposed mitigation, would also result in the least overall harm to Section 4(f) properties, as described in **Chapter 4 – Section 4(f) Evaluation**. The CDOT Project Team used an extensive public involvement approach during the development of each alternative, as discussed above and in **Chapter 6 – Comments and Coordination**. Throughout the many opportunities to provide input, the public has consistently expressed preference for the Modified I-25 Alternative.

Phasing and Funding

Construction phases typically are determined during the final design when additional detail is available. However, for major transportation projects, physical and funding limitations associated with constructing the entire project at one time—including phasing and fiscal constraints—need to be identified and disclosed during the NEPA process and prior to approval of the Record of Decision (ROD).

The preliminarily identified Preferred Alternative is estimated to cost approximately \$760.5 million (based on preliminary design estimates in 2010 dollars)—including design, right-of-way (ROW) acquisition, and construction—which is more than what is currently available in the PACOG Fiscally Constrained Plan in the *Pueblo Area 2035 Long Range Transportation Plan* (PACOG, 2008). Because FHWA can approve in a ROD only those project improvements that are included in the Fiscally Constrained Plan, a phased approach is necessary. Using this approach, which allows for disclosure and discussion of project phasing during the NEPA process, additional detail is provided regarding phasing as an enhancement to the typical NEPA process. Each additional phase of the project will need to be included in the 20-year Fiscally Constrained Plan as additional project phases are funded, with at least a portion placed in the Statewide Transportation Improvement Program (STIP). This process, including the preparation of a ROD for each project phase along with the opportunity for the public to comment, will be repeated until construction of the entire Preferred Alternative identified in the Draft Environmental Impact Statement (DEIS) is completed.

After the Final EIS (FEIS) has been made available to the public and the review period concludes, FHWA and CDOT will decide whether to select an initial phase for the first

ROD. Subsequent RODs will take into consideration the FEIS, the preceding RODs, and any environmental reevaluations that may have been performed. To accommodate the funding limitations described above, the preliminarily identified Preferred Alternative has been divided into three phases: Phase 1, Phase 2, and Phase 3. In selecting project phases, care was taken to ensure that each phase demonstrates independent utility; that is, it can be constructed and function independently without other phases or improvements. Phase 1, which consists of replacing the three structurally deficient bridges in the corridor (Ilex Street, Indiana Avenue, and Northern Avenue), would cost approximately \$123.5 million (2010 dollars). Phase 1 is proposed as the initial phase for the first ROD. Later phases would be constructed over time and as funding becomes available; these phases are described in **Chapter 5 – Phased Project Implementation** in concept.

Phases 2 and 3 do not necessarily need to be selected in their entirety or in order in subsequent RODs. This will be determined at the time of a subsequent ROD, considering available funding, priorities at that time, and the results of any reevaluation that may be needed. Future funding availability will play a major role in determining when construction begins and the priority and schedule under which the packages within each phase can be implemented.

Additional information regarding the funding process and phases of construction, including mitigation is described in **Chapter 5 – Phased Project Implementation**.

AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND MITIGATION

Detailed studies were conducted to determine the impacts of the project alternatives on different social, environmental, and economic resources, including:

- ❖ Transportation
- ❖ Historic Properties and Archeological Resources
- ❖ Parks and Recreation
- ❖ Right-of-Way and Relocations
- ❖ Noise
- ❖ Socioeconomics and Environmental Justice
- ❖ Wetlands
- ❖ Land Use
- ❖ Visual Resources

- ❖ Air Quality
- ❖ Hazardous Materials
- ❖ Fish and Wildlife Habitat
- ❖ Sensitive Species
- ❖ Floodplains
- ❖ Water Quality
- ❖ Utilities
- ❖ Energy
- ❖ Noxious Weeds
- ❖ Paleontological Resources
- ❖ Soils and Geology
- ❖ Short-term Uses versus Long-term Productivity
- ❖ Irreversible and irretrievable Commitment to Resources
- ❖ Cumulative Impacts

Due to the similarities in their features, the impacts of the Existing I-25 Alternative and the Modified I-25 Alternative are similar throughout much of the corridor. Both alternatives would impact wetlands, surface waters, floodplains, historic resources, and parks and recreational facilities. Both alternatives would include noise impacts on adjacent properties and handling of hazardous materials. In the Central Area of the project, where the designs of the alternatives differ, the Modified I-25 Alternative would impact a greater acreage of wetlands but would cause less overall harm to Section 4(f) properties. The Existing I-25 Alternative would provide fewer transportation and socioeconomic benefits because it provides less local connectivity.

Exhibit ES-7 further summarizes the impacts of the project alternatives and includes mitigation strategies to address the effects. As per standard regulations, and in collaboration with permitting agencies and local jurisdictions, CDOT designed the alternatives to limit environmental effects associated with the project. Steps in this process include:

- ❖ First, avoiding impacts to the extent possible through measures such as modifying the alignment to avoid sensitive resources.
- ❖ Second, minimizing impacts through measures such as increasing the span length between bridge columns to affect a smaller area of wetlands, parks, or sensitive habitat.
- ❖ Third, identifying appropriate mitigation measures to offset remaining project effects that cannot be avoided or minimized.

Detailed information on the existing conditions in the corridor; effects of the project alternatives on the various social, environmental, and economic resources; and proposed mitigation strategies are included in **Chapter 3 – Affected Environment and Environmental Consequences**.

SECTION 4(f) EVALUATION

Section 4(f) of the U.S. Department of Transportation Act of 1966 declares that “it is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges and historic sites” (49 United States Code [USC] 303). Section 4(f) is applicable to historic properties if those properties are eligible for listing or are listed on the National Register of Historic Places.

The Build Alternatives are expected to require direct use of Section 4(f) resources. The Existing I-25 Alternative would result in the use of 35 Section 4(f) properties, including 3 historic districts (84 contributing properties), 28 individual historic properties, and 4 park and recreational resources. The Modified I-25 Alternative would result in the use of 39 Section 4(f) properties, including 4 historic districts (78 contributing properties), 30 individual historic properties, and 5 park and recreational resources. The Modified I-25 Alternative appears to be the least overall harm alternative because it better meets the project’s Purpose and Need, allows for the replacement and expansion of Benedict Park, has fewer impacts to the Steelworks Suburb Historic District, and is supported by local officials, as described in **Chapter 4 – Section 4(f) Evaluation**.

Avoidance alternatives, including bypasses, were considered, but none were feasible and prudent, as defined by Section 4(f). The evaluation presents mitigation strategies to avoid or minimize harm to affected properties.

COMMUNITY OUTREACH AND AGENCY INVOLVEMENT

Early and ongoing public and agency involvement occurred throughout this project. The goal of the Context Sensitive Solutions process was to provide opportunities for meaningful participation in the decision process beginning with problem definition, continuing through development of alternative solutions and evaluation and screening of

alternatives, and ending with preliminary identification of the Preferred Alternative for implementation. The process was designed to solicit information, ideas, and opinions from the public and agencies interested in the New Pueblo Freeway project. CDOT will continue to conduct public involvement efforts throughout the life of the project through final construction.

Four leadership teams and associated committees—the Project Leadership Team (PLT), the Technical Leadership Team (TLT), the Community Working Groups (CWG), and the Park Advisory Committee (PAC)—were organized and managed by CDOT to provide data and input to FHWA in four different aspects of project development: public policy, planning and engineering, community values, and City parks. Throughout the project, individual teams met at regular intervals and as events warranted. The leadership teams provided multi-disciplinary input based on their individual areas of expertise and reviews throughout the life of the project, while the committees provided the CDOT Project Team with insights into community issues on an as-needed basis.

From 2000 to 2009, the following public meetings and outreach methods were implemented for the New Pueblo Freeway project:

- ❖ 9 Open Houses
- ❖ 4 Community Workshops
- ❖ 15 Community Working Group Meetings
- ❖ 23 Neighborhood Workshops
- ❖ 6 Business Group Meetings
- ❖ 3 Individual Home and Business Owner Meetings
- ❖ 3 Local Agency Meetings
- ❖ 2 Business Workshops
- ❖ 1 Business Meeting
- ❖ 1 Neighborhood Event
- ❖ 2 Issue-Focused Meetings
- ❖ 7 Park Advisory Committee Meetings
- ❖ 1 Door-to-Door Event
- ❖ A Telephone Hotline
- ❖ A Project Website
- ❖ Brochures and Flyers
- ❖ Newspaper Coverage and Public Notices
- ❖ Television and Radio Coverage

More information regarding public outreach efforts for the New Pueblo Freeway project is presented in **Chapter 6 – Comments and Coordination**.

EXHIBIT ES-7

Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
TRANSPORTATION				
Interchanges	Interchanges would continue to connect to discontinuous local and neighborhood streets.	Upgrades interchanges to current design standards and improves interchange spacing and provides connectivity to appropriate local streets.		None needed; changes to interchanges and local connectivity is a positive improvement.
Local connectivity	Conflicts would persist between local and regional I-25 users. Local users would continue to rely on I-25 for north-south trips and I-25 would act as a barrier for east-west local mobility.	Reconstructs interchanges at US 50B and between 1st Street and 13th Street to connect I-25 to more appropriate city streets. Extends Dillon Drive to increase off-highway local mobility for local users.		
		Improves east-west connectivity through reconstruction of the Abriendo Avenue and Northern Avenue interchange complex. Provides alternative north-south routes for local users on Dillon Drive. Improves off-highway local mobility for local users by constructing frontage road system at Northern Avenue.	Restores off-highway connections that were removed during original I-25 construction. Provides alternative north-south routes for local users on Santa Fe Avenue and Dillon Drive. Reduces demand on I-25 and increases local mobility and east-west access by reconstructing the Northern Avenue interchange and construction of a frontage road system. Extension of Santa Fe Avenue and Stanton Avenue to reestablish 23 miles of local grid system and improve safety and local mobility.	
Bridges	Aging and functionally obsolete bridges would continue to deteriorate.	25 bridges will be replaced; 6 with a sufficiency rating below 50 and 8 with a rating between 50 and 80.		None needed; replacement of bridges is a positive improvement.
Transit	No changes to current conditions.	Modifies transit Route 6 by reconfiguring the downtown interchange system.	Modifies transit Route 6 by reconfiguring the downtown interchange system and transit Route 11 by reconfiguring Santa Fe Avenue and Stanton Avenue.	To minimize the impact of construction on bus routing and service, CDOT will coordinate with the Pueblo Transit System prior to and throughout construction.

EXHIBIT ES-7

Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Pedestrian and bicycle facilities	No changes to current conditions.	Pedestrian mobility would be improved through provisions of multi-modal elements such as trails and sidewalks. Construction of pedestrian trails along I-25 to the north and south and across I-25 near Mineral Palace Park and the trails and sidewalks connecting Runyon Field Sports Complex and JJ Raigoza Park would improve pedestrian and bicycle mobility.		None needed; changes to pedestrian and bicycle facilities are a positive improvement.
Railroad	No changes to current conditions.	Relocates existing railroad tracks to the east near Abriendo Avenue to accommodate wider highway footprint. Temporary impacts during bridge construction.	Temporary impacts during bridge construction.	CDOT will follow appropriate permitting, including coordination with the railroads for impacts to the rail lines during bridge construction under the Build Alternatives and track realignment under the Existing I-25 Alternative.
Traffic during construction	Not applicable.	Temporary impacts to traffic during construction such as changes in access, delay caused by lane closures, out-of-direction travel incurred due to detours, and other similar unavoidable impacts caused by construction-related activities.		<p>CDOT will conduct public information efforts, including the development of a Public Information Plan (described in more detail in Section 3.1 Transportation) to inform the public and affected businesses in advance of lane closures, detours, and interchange reconstruction activities.</p> <p>CDOT will maintain safe business access and provide at least one access point to downtown Pueblo.</p> <p>CDOT will develop a traffic control plan during final design that will detail strategies (described in more detail in Section 3.1 Transportation) to minimize traffic disruption from construction activities. Whenever possible, the existing number of lanes will be maintained through construction. Speed limits will be reduced in work zones.</p> <p>A mitigation monitoring and implementation plan will be developed during final design. Commitments to mitigate for both construction and operational effects of a Preferred Alternative will be modified or adapted as needed based on final design.</p>

EXHIBIT ES-7

Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Traffic post construction	Traffic congestion would continue to increase.	Corrects geometric and operation deficiencies through the corridor. Improves congestion on I-25.		None needed.
HISTORIC PROPERTIES				
Historic resources	No impacts to known historic resources.	Adverse effects to 33 historic resources, including adverse effects to the North Side, Second Ward, and Steelworks Suburbs historic districts.	Adverse effects to 40 historic resources, including adverse effects to the North Side, Second Ward, Steelworks Suburbs, and Grove historic districts.	A Programmatic Agreement will be completed prior to publication of the Final EIS that identifies specific mitigation measures, which may include surveys and documentation of historic structures, salvage of historic materials from structures, or preparation of educational materials detailing the history of the area. Potential mitigation measures are described in more detail in Section 3.2 Historic Properties .
Archaeological resources	No impacts to known archaeological resources.	Potential impact to 21 Need Data Archaeological sites (11 of which are the same as those that could be affected by the Modified I-25 Alternative).	Adverse effects to 2 archaeological sites. Potential impact to 22 Need Data sites (11 of which are the same as those that could be affected by the Existing I-25 Alternative).	Final mitigation measures will be formalized in the Programmatic Agreement as described in Section 3.2 Historic Properties .
PARKS AND RECREATION				
Detention Ponds between 29th Street and 24th Street	Existing effects to park facilities due to the proximity of roads to the parks will continue.	No direct impacts would occur. Without mitigation, the park would experience an increase in noise.		Noise barriers will be constructed to reduce noise impacts to this property (described in more detail in Section 3.5 Noise).
JJ Raigoza Park	Existing effects to park facilities due to the proximity of roads to the parks will continue.	No direct impacts would occur. Without mitigation, the park would experience an increase in noise.		A noise wall and berm will be constructed to reduce the noise impact to the Evans area between Maryland Avenue and Nevada Avenue (described in more detail in Section 3.5 Noise).

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Mineral Palace Park	Existing noise and visual effects to park facilities due to the proximity of roads will continue.	Widening of I-25 adjacent to Mineral Palace Park would result in a loss of 50 feet along the entire eastern edge of the park, equal to 1.69 acres (3 percent of the park). Widening would also remove the northeast park road to a parking lot, 40 parking spaces, vegetation including: 20 mature trees, 15 to 20 percent of Lake Clara, 40 feet of the Works Progress Administration wall around Lake Clara, and 13 percent of the maintenance yard. An informal path within the park would also be impacted. Without mitigation, the park would experience an increase in noise.		City of Pueblo staff and citizens participated in an extensive public involvement process to determine adequate mitigation for impacts to Mineral Palace Park. This process resulted in the development of a restoration plan for the park (described in more detail in Section 3.3 Parks and Recreation). The restoration will adhere to a theme of celebrating the past and connecting to neighborhoods. Noise walls and berms will be constructed to reduce noise from I-25 (described in more detail in Section 3.5 Noise).
Fountain Creek Park Land and Trail	Continued sedimentation and pollutant loading from stormwater runoff into surface waters, riparian areas, and wetlands adjacent to the highway could adversely affect wildlife habitat.	Extension of Dillon Drive to US 50B, relocation and widening of US 50B to the north, and improved 8th Street connection to the east of I-25 would require the acquisition of 7.90 acres of property from Fountain Creek Park Land property. A retaining wall was incorporated into the design to avoid impacts to the Section 6(f) resource at US 50B. Stormwater detention features would impact 1.40 acres of the parkland. Temporary detours of the Fountain Creek Trail would be required to protect the public when construction is occurring above the trail.		Water treatment ponds will be constructed to treat highway runoff from I-25, resulting in improved water quality in Fountain Creek and in the riparian and wetland habitat areas adjacent to the creek. Trails and picnic areas will also be incorporated. CDOT will construct a pedestrian bridge to provide access to the park land from Mineral Palace Park and its surrounding neighborhood. CDOT will provide advance notice to the public of temporary trail detours and/or closures of the Fountain Creek trail during construction. Access will be maintained throughout construction to minimize impacts to users.
Arkansas River Corridor	No changes to current conditions.	Temporary detours and/or closures of the Arkansas River Trail would be required to protect the public when construction is occurring above the trail.		CDOT will provide advance notice to the public of river closures or temporary detours and/or closures of the Arkansas River trail during construction. Access will be maintained as much as possible to minimize impacts to users.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Benedict Park	No changes to current conditions.	Relocation of the existing freight rail line to the east would remove 0.42 acre of Benedict Park, including the elimination of the informal athletic field.	Realignment of I-25 to the east would completely remove Benedict Park (1.92 acres) and its facilities.	Mitigation for impacts to Benedict Park under the Existing I-25 Alternative includes a 2.13-acre expansion of Benedict Park. The new park would be 4.05 acres in size with 1.50 acres north of Mesa Avenue and 2.55 acres south of Mesa Avenue. Under the Modified I-25 Alternative, a new 4.30-acre Benedict Park will be built south of the existing park location between Mesa Avenue and Northern Avenue using remnant parcels of land resulting from changes in the roadway network. Mitigation is described in more detail in Section 3.3 Parks and Recreation .
Runyon Field Sports Complex	Access to the Runyon Field Sports Complex would remain difficult. Before and after events, queues would continue to extend onto I-25.	No changes to current conditions.	Extension of Stanton Avenue would positively impact Runyon Field Sports Complex by providing access to the park from the local road network instead of I-25 and minimizing traffic queues on I-25.	None needed for the Existing I-25 Alternative, since there are no changes to the current conditions. For the Modified I-25 Alternative, the change in access is a positive improvement, and no additional mitigation is required.
Runyon/ Fountain Lakes State Wildlife Area	No changes to current conditions.	I-25 reconstruction would temporarily impact the Thomas Phelps Creek Trail.	Realignment of I-25 to the east would construct four new bridges over the Arkansas River with 18 bridge piers, and require the relocation of trails and an existing pedestrian bridge. I-25 reconstruction would temporarily impact the Thomas Phelps Creek Trail.	The pedestrian bridge over the Arkansas River would be relocated just east of the proposed Stanton Avenue bridge to allow room for the new bridges that will span the river east of the current I-25 alignment for the Modified I-25 Alternative. The trail would be relocated over the new pedestrian bridge. Mitigation is described in more detail in Section 3.3 Parks and Recreation . CDOT will provide advance notice to the public of temporary detours and/or closures of the Thomas Phelps Creek trail during construction. Access will be maintained as much as possible to minimize impacts to users.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Noise impacts to parks	Existing effects to park facilities due to the proximity of roads to the parks will continue.	Detention ponds between 29th Street and 24th Street, Mineral Palace Park, and JJ Raigoza Park would potentially be impacted by noise.		To alleviate forecasted noise from I-25, noise walls and berms (where appropriate) will be constructed (described in more detail in Section 3.5 Noise).
RIGHT-OF-WAY				
Property acquisition	No changes to current conditions.	Construction of highway improvements would require a total of 273 acquisitions (219 total and 54 partial) and 154 acres (74 total and 80 partial).	Construction of highway improvements would require a total of 309 acquisitions (246 total and 63 partial) and 178 acres (84 total and 94 partial).	All property acquisition and relocation will comply fully with federal and state requirements, including the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act). All impacted owners will be provided notification of CDOT's intent to acquire an interest in their property including a written offer letter of just compensation specifically describing those property interests. A ROW specialist will be assigned to each property owner to assist them with this process. All displaced residents must be relocated to dwellings that are similar to the original dwellings that are being acquired. If during phasing comparable housing is not available, then CDOT will work with those impacted residents under the Uniform Act to move them into a comparable or better home. Mitigation is described in more detail in Section 3.4 Right-of-Way and Relocation .
Residential impacts	No changes to current conditions.	Residential impacts include 87 total acquisitions (9 acres) and 2 partial acquisitions (<1 acre).	Residential impacts include 117 total acquisitions (14 acres) and 0 partial acquisitions.	
Commercial impacts	No changes to current conditions.	Commercial impacts include 53 total acquisitions (32 acres) and 25 partial acquisitions (36 acres).	Commercial impacts include 56 total acquisitions (34 acres) and 26 partial acquisitions (46 acres).	
Vacant undeveloped impacts	No changes to current conditions.	Vacant undeveloped impacts include 66 total acquisitions (27 acres) and 14 partial acquisitions (37 acres).	Vacant undeveloped impacts include 58 total acquisitions (27 acres) and 22 partial acquisitions (42 acres).	
Business displacements	No changes to current conditions.	A total of 58 businesses would be displaced.	A total of 65 businesses would be displaced.	

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Public acquisitions	No changes to current conditions	Public impacts include 13 total acquisitions (6 acres) and 13 partial acquisitions (6 acres)	Public impacts include 15 total acquisitions (9 acres) and 15 partial acquisitions (6 acres)	These properties are considered mutually beneficial, and the Memorandum of Understanding signed between CDOT and the City of Pueblo (see Appendix F) specifies the future land exchange, ownership, and maintenance responsibilities. A future Intergovernmental Agreement will address ownership of excess ROW. Mitigation is described in more detail in Section 3.4 Right-of-Way and Relocation .
NOISE				
Operational noise receptors	Noise levels from I-25 would change between existing conditions and conditions for the No Action Alternative in the design year (2025), due to changes in traffic volume and speed.	Seven receptors in the North Area and two receptors in the South Area would meet or exceed CDOT's noise abatement criteria. Locations in the north include Goat Hill, Mineral Palace Park, Fountain Creek Park Land, residences at 20th Street and Santa Fe Avenue, 25th Street and Main Street, and 27th Street and Court Street, and Tony's Mobile Home Park. Locations in the south include JJ Raigoza Park and residences at Iowa Avenue and Evans Avenue.		Under the Existing I-25 Alternative a total of 23,710 ft of noise walls would be constructed along the corridor to mitigate noise impacts. Under the Modified I-25 Alternative a total of 21,525 ft of noise walls would be constructed along the corridor to mitigate noise impacts. Noise walls were determined to be the most appropriate mitigation strategy for this project, except for Mineral Palace Park where berms would better fit the context of the park. Mitigation is described in more detail in Section 3.5 Noise . Additional noise analysis will be performed during final design to refine the final mitigation measures and dimensions.
		Four receptors would meet or exceed CDOT's noise abatement criteria in the Central Area. Locations include Aqua Avenue and Evans Avenue, Emerson Avenue and Abriendo Avenue, Fairview Avenue and Currie Street, and B Street and Rush Street.	Four receptors would meet or exceed CDOT's noise abatement criteria in the Central Area. Locations include Aqua and Evans, Emerson and Abriendo, Benedict Park, and Locust and Moffat.	
Construction noise	Not applicable.	Construction would create temporary noise impacts.		Construction noise will be mitigated by restricting construction to daylight hours when possible and requiring contractors to use well-maintained equipment, including muffler systems.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
SOCIAL RESOURCES, ECONOMIC CONDITIONS, AND ENVIRONMENTAL JUSTICE				
Business relocations	No changes to current conditions.	58 businesses would be relocated.	65 businesses would be relocated.	Efforts will be made to relocate businesses that are displaced within the city limits in order to maintain property and sales tax revenues to the City (described in more detail in Section 3.6 Social Resources, Economic Conditions, and Environmental Justice). All property acquisition and relocation shall comply fully with federal and state requirements, including the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act). Refer to Section 3.4 Right-of-Way and Relocation for more information.
Employment	No changes to current conditions.	Business relocations would impact employment (up to 600 jobs, or 1 percent of the total employment in Pueblo County). The implementation of either alternative would generate direct and indirect employment opportunities throughout construction.		Relocation areas for businesses serving the city and region will be identified. Efforts will be made to relocate displaced businesses within the city limits in order to maintain employment and tax revenues (described in more detail in Section 3.6 Social Resources, Economic Conditions, and Environmental Justice).
Community cohesion	No changes to current conditions.	Community cohesion in the Northside, Eastside, Downtown, and Bessemer neighborhoods would be positively impacted by improved local roadway and trail systems.		None needed.
Residential relocations	No changes to current conditions.	Requires acquisition of 71 residences from the west side of the Bessemer Neighborhood.	Requires acquisition of 65 residences from the west side of the Bessemer Neighborhood and 34 residences in the Grove Neighborhood.	All property acquisition and relocation shall comply fully with federal and state requirements, including the Uniform Act. Refer to Section 3.4 Right-of-Way and Relocation for more information.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Environmental Justice	No changes to current conditions.	Impacts from either alternative would be predominantly borne by minority and low-income populations. When off-setting benefits from the project and proposed mitigation are also considered, these impacts would not be considered disproportionately high and adverse.		CDOT will make a public information plan available throughout construction. This plan and any information on construction activities and detours will be provided in both English and Spanish.
Community impacts during construction	No changes to current conditions.	Detours and traffic delays would inconvenience residents, businesses and community facilities during construction.		Signage and detours will be set in place to direct traffic to businesses, residences, and community facilities adjacent to construction. CDOT will provide advance notice to emergency service providers, schools, the community, and residents regarding road delays, access, and special construction activities. Aesthetic enhancements of the highway improvements will be implemented as agreed upon in the Memorandum of Understanding between the City and CDOT (see Appendix F).
WETLANDS				
Wetlands	No wetlands or waters of the United States would be impacted. Wetlands in the project area that are currently affected by the influx of pollutants contained in highway runoff would continue to degrade over time.	Direct loss of 0.22 acres of wetlands.	Direct loss of 1.1 acres of wetlands.	Wetland boundaries will be re-evaluated to determine the need for additional delineations once construction funding has been identified. CDOT will obtain an Individual Section 404 permit from the USACE under Section 404 of the Clean Water Act prior to construction. CDOT and the Federal Highway Administration will work with the USACE to identify a suitable site for wetland mitigation that would replace the functional values impacted by the project. CDOT will replace removed wetlands on a 1:1 basis regardless of jurisdictional determination. Additional mitigation measures identified by the USACE also include placing tree cuttings at various locations near the project area. Mitigation is described in more detail in Section 3.7 Wetlands .

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
				Following final design, CDOT will apply for an SB 40 Wildlife Certification, if the project does not fall within CDOT's Programmatic Agreement with CDOW, including detailed plans and specifications.
Construction impacts	Not applicable.	Best management practices (BMPs) will be used to control erosion and sedimentation within wetlands or waters of the US during construction.		BMPs (described in more detail in Section 3.7 Wetlands) will be used during construction. All areas temporarily disturbed by construction activities will be restored and revegetated. Construction impact boundaries will be clearly marked. Wetlands outside the authorized temporary impact areas will be clearly marked and fenced (silt fence) to prevent disturbance during construction.
LAND USE				
Consistency with local land use plans and policies	Consistent with the <i>Pueblo Roadway Corridor Right-of-Way Preservation Plan</i> (PACOG, 2000). Inconsistent with the <i>Pueblo Regional Development Plan</i> (PACOG, 2002). Does not support the <i>Central Pueblo Framework Plan</i> (PACOG, 2005).	Project improvements are consistent with the <i>Pueblo Comprehensive Plan</i> , <i>Pueblo Roadway Corridor Right-of-way Preservation Plan</i> ; and the <i>Central Pueblo Framework Plan</i> .		None needed.
Consistency with current and future land uses	Consistent with current land use and future land uses.	Improvements are consistent with current land use and future land uses.	Improvements are not consistent with current land uses in the Central Area; however, they are consistent with future planned land uses.	None needed.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
VISUAL RESOURCES				
Visual resources	I-25 would become increasingly congested. The resulting traffic would become more visually apparent in all viewsheds and to homes, businesses, parks, and public facilities that currently back up to the highway.	Increased mass of the highway, noise barriers and water quality ponds would increase the highway's visual presence in existing neighborhoods along I-25. Alters the Fountain Creek, Downtown and Steel Mill viewsheds by introducing new roadway modifications. Removes the historic smoke stacks, stoves, and high line track from the Evraz Rocky Mountain Steel Mills site.	Increased mass of the highway, noise barriers, and water quality ponds would increase the highway's visual presence in existing neighborhoods along I-25. Alters the Fountain Creek, Downtown, and Steel Mill viewsheds by introducing new roadway modifications. Removes the smoke stacks and stoves from the Evraz Rocky Mountain Steel Mills site.	Mitigation measures to soften impacts and enhance the aesthetic treatments of the highway improvements (described in more detail in Section 3.9 Visual Resources) would be implemented as identified in a Memorandum of Understanding between the City of Pueblo and CDOT. CDOT will follow the <i>New Pueblo Freeway Aesthetic Guidelines</i> (included in Appendix C) during final design and construction.
AIR QUALITY				
Air quality	No changes to current conditions	Pueblo County is currently in attainment of the NAAQS for all criteria pollutants; therefore, no regional air quality conformity analysis or project/meso-scale corridor level analysis was required or performed for this project. As no adverse air quality impacts are anticipated to occur as the result of the proposed improvement, mitigation is not required from an air quality standpoint.		None needed.
Carbon monoxide	No NAAQS violations expected.	No CO NAAQS violations are expected and improvements in travel performance should lessen the potential occurrence.		None needed.
Particulate matter	No violations expected for PM ₁₀ .	Exceedance of NAAQS for PM ₁₀ is not expected and improvements in travel performance should lessen the potential occurrence.		None needed.
Mobile Source Air Toxics	MSAT emissions levels are expected to reduce as a result of EPA's national control programs.	MSAT emissions are proportionate to the increase in VMT over the No Action Alternative.		None needed.
Air quality during construction	Not applicable.	Construction impacts from excavation, grading, and fill work could increase local fugitive dust and exhaust emissions.		BMPs improvements (described in more detail in Section 3.10 Air Quality) would be implemented to control dust. Construction equipment will be required to have and maintain proper controls for exhaust systems.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
HAZARDOUS MATERIALS				
Recognized environmental conditions	No changes to current conditions.	Impacts five RECs: River Street property; Evraz Rocky Mountain Steel Mills slag piles, Evraz Rocky Mountain Steel Mills property, Arkansas River and Santa Fe Street site, and Pepsi-Cola Bottling Company.	Impacts six RECs: River Street property; Evraz Rocky Mountain Steel Mills slag piles, Evraz Steel Mills property, Santa Fe (bridge) culvert site, Missouri Pacific Yard, and Pepsi-Cola Bottling Company.	A site-specific Phase I Environmental Site Assessment or Initial Site Assessment will be conducted prior to construction or acquisition of any site. The nature and extent of any soil or groundwater contamination will be assessed to determine whether remediation will be required or modifications to project design can be made.
Areas of potential environmental concern	No changes to current conditions.	Impacts four areas of potential environmental concern: industrial facility south of Dillon Drive; federal Emergency Response Notification System Site #1, Greenhorn Drive area, and Wagner Equipment Company.	Impacts five sites of potential environmental concern: Industrial facility south of Dillon Drive; federal Emergency Response Notification System Site #1, Greenhorn Drive area, Wagner Equipment Company, and Meridian rail facility.	<p>A Phase II ESA may be performed on RECs or areas of potential environmental concern. Mitigation will be required if the results determine there are potential impacts to human health or the environment. Prior to construction, a Health and Safety Plan will be developed.</p> <p>A Materials Management Plan (MMP), which includes asbestos containing materials (ACM), and a Health and Safety Plan will be developed for areas with known soil and groundwater contamination. The level of remediation will be determined in accordance with applicable federal and state laws, based on the final project alignment, ROW requirements, and degree of subsurface disturbance during construction.</p> <p>Engineering controls will be considered to minimize potential disposal costs and to avoid contamination. Responsible parties will be identified, if needed, to ensure CDOT is not liable for future remediation.</p> <p>If dewatering is necessary, groundwater will be managed according to applicable regulations and permitted by the CDPHE Water Quality Control Division.</p> <p>Wells within the construction area will be abandoned and plugged in compliance with the Colorado Department of Natural Resources Division of Water Resources State Engineer</p>

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
				<p>Water Well Construction Rules.</p> <p>Prior to demolition of structures, any asbestos, lead-based paint, heavy metals, universal wastes, Toxic Substances Control Act wastes, or miscellaneous hazardous materials will be surveyed. Abatement of regulated material will be conducted. Regulated materials must be removed from structures prior to demolition and appropriately recycled or disposed.</p> <p>Byproducts of steel manufacturing shot and slag will likely be encountered during construction at the Evraz Rocky Mountain Steel Mills. Special waste handling and excavation requirements will be developed once the chemical composition and volume of the material is known (described in more detail in Section 3.11 Hazardous Materials).</p>
Buried construction debris	No changes to current conditions.	As with any construction project that involves excavation there is the potential to unearth buried construction debris. Such unforeseen debris sometimes can include asbestos containing material that requires special handling and disposal. Byproducts of steel manufacturing shot and slag have been stockpiled at the Evraz Rocky Mountain Steel Mill site and will likely be encountered during construction. Special waste handling and excavation requirements will be necessary during construction.		A qualified asbestos professional will evaluate and recommend mediation for any potential ACM, including landfill material, construction debris, utilities, or other materials. Appropriate CDOT specifications will be followed regarding the potential for asbestos-containing construction debris in soil.
FISH AND WILDLIFE HABITAT				
Wildlife habitat loss and fragmentation	No changes to current conditions.	Direct loss of 8.95 acres of wildlife habitat. Extension of Abriendo Avenue would divide wetlands and wooded upland habitat near Santa Fe Avenue.	Direct loss of 18.10 acres of wildlife habitat. Shifting I-25 to the east would result in fragmentation of riparian habitat along the Arkansas River and removal of 60 percent of the wooded upland habitat and almost all of the wetland near Santa Fe Avenue.	Habitat replacement, restoration, or enhancement will be conducted to mitigate for impacts that could not be avoided, including impacts to the wetland and riparian areas along Fountain Creek and adjacent to the Arkansas River (described in more detail in Section 3.12 Fish and Wildlife Habitat). Wildlife surveys will be done prior to final design and construction to identify additional opportunities to avoid and minimize impacts to fish and wildlife habitats.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Migratory birds	No changes to current conditions.	Loss of low-quality nesting habitat for migratory birds.		Field surveys will be conducted prior to construction activities to determine the presence or absence of birds protected under the Migratory Bird Treaty Act. Construction activities that would otherwise result in the take of migratory birds, eggs, young, and/or active nests will be avoided during the nesting season. Active bird nests, trees, grasses, and shrubs will not be removed during nesting season. Trees that are removed will be mitigated at a 1:1 ratio or as specified by state and federal wildlife agencies to ensure raptor perch trees are replaced for future use. Mitigation measures are described in more detail in Section 3.12 Fish and Wildlife Habitat .
Open water	No changes to current conditions.	Construction of new bridge piers over the Arkansas River would impact 0.01 acres of open water.	Construction of new bridge piers over the Arkansas River would impact 0.08 acres of open water.	CDOT will adhere to the requirements of SB 40 Wildlife Certification for impacts to open water and riparian habitats (described in more detail in Section 3.12 Fish and Wildlife Habitat).
Impacts of construction on wildlife and habitat	No changes to current conditions.	Both Alternatives result in noise from construction activities that could affect wildlife species, and could temporarily displace priority bird species. Construction activities could also affect wildlife by removing vegetation and wildlife habitats.		Best Management Practices (described in more detail in Section 3.12 Fish and Wildlife Habitat) such as limiting sedimentation, revegetation, and clearly marking construction boundaries to prevent equipment or other intrusion into habitat located outside the construction zone will be adopted to minimize construction impacts on wildlife and habitat resources within the study area. A concrete washout area will be provided at suitable locations within the CDOT ROW during construction, as described in more detail in Section 3.12 Fish and Wildlife Habitat .

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
SENSITIVE SPECIES				
Plains Leopard Frog	No changes to current conditions.	Impacts to 5.21 acres of plains leopard frog habitat.	Impacts to 8.68 acres of plains leopard frog habitat.	<p>The mitigation measures to compensate for impacts on wetlands, flowing water, and riparian habitats used by the Arkansas darter and plains leopard frog are described in Sections 3.7 Wetlands, 3.12 Fish and Wildlife, 3.15 Water Quality, and 3.18 Noxious Weeds. These mitigations might benefit terrestrial and aquatic plant and wildlife species by improving and protecting potential habitat along the Arkansas River and Fountain Creek, as well as their respective floodplains. Implementing these mitigation measures might enlarge the size of contiguous blocks of wetland and riparian habitats, improve habitat connectivity, and enhance functions of the existing habitat. Such results would provide functional benefits for sensitive species.</p> <p>Habitat restoration or enhancement will be conducted to mitigate for impacts that could not be avoided, including impacts to the wetland and riparian areas along Fountain Creek and adjacent to the Arkansas River (described in more detail in Section 3.13 Sensitive Species).</p> <p>A Senate Bill 40 permit will be obtained by CDOT prior to construction.</p>
Arkansas Darter	No changes to current conditions.	Impacts to 0.14 acres of Arkansas darter habitat.	Impacts to 0.21 acres of Arkansas darter habitat.	

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
FLOODPLAINS				
Fountain Creek Floodplain	No changes to current conditions.	Inundates 3.35 acres near the US 50B bridge during a 100-year flood event, in an area not currently within the 100-year floodplain boundaries. Dillon Drive extension results in two longitudinal encroachments of the floodplain. Increases the BFE and floodplain width upstream of the new Dillon Drive embankment; increase channel velocity below the embankment. Reconstructed Us 50B bridge would have a greater conveyance capacity, resulting in a decrease in BFE near the bridge. Scouring and erosion may result at the US 50B bridge.		<p>Mitigation measures to demonstrate no rise may involve channel grading to increase conveyance, construction of an overflow channel, or reduction in the channel roughness. The small inundated area located within the Fountain Creek Floodplain will be managed to reduce impacts. Approximately 0.2 acres of private property may be acquired by CDOT, and the estimated 3.2 acres of City of Pueblo property will be managed in perpetuity as part of the Fountain Creek Park Land. The City has agreed in its Memorandum of Understanding with CDOT that no structures will be permitted in this area (see Appendix F). Depending upon the results of the floodplain analyses using revised modeling and final design configuration of I-25, CDOT will likely need to apply for Flood Insurance Rate Map revisions through the FEMA as described in more detail in Section 3.14 Floodplains. A Letter of Map Revision (LOMR) application is required for any substantial encroachment upon the floodplain. Streambed and bank stabilization measures (described in more detail in Section 3.14 Floodplains) will be included in the final project for the area surrounding the US 50B bridge. Floodplain mitigation will comply with Executive Order (EO) 11988, "Floodplain Management," during design of any selected alternative. State of Colorado drainage design standards will be applied to achieve results that will not increase or significantly change the flood elevations and/or limits.</p>

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Arkansas River floodplain	No changes to current conditions.	Impacts to the Arkansas River floodplain for the Existing I-25 Alternative would be limited to replacement of the existing I-25 bridge in its approximate current location. In the area where the new piers would be placed, model results showed a slight (0.1 foot) decrease in BFE, reduction in floodplain width (3 feet), and an increase in velocity, which would be an improvement to the existing floodplain.	Impacts to the Arkansas River floodplain for the Modified I-25 Alternative would be located east of the existing bridge and would result in a new transverse encroachment on the floodplain and floodway. River velocity in this location is low (less than 2 feet per second), and the impacts of encroachments for a new bridge are minimal. Implementation of the Modified I-25 Alternative would not flood any new areas that are not within the existing 100-year floodplain.	Under analyses conducted for this Environmental Impact Statement, impacts to the Arkansas River floodplain and floodway are expected to be minimal, and required mitigation measures will be limited to erosion protection for bridge structures. New bridge structures will have foundations designed to limit scour and proposed abutments within the floodplain will be protected from erosion. Measures that may be included in protecting the bridges include rip rap armoring of banks and slope paving. Floodplain mitigation will comply with EO 11988, "Floodplain Management," during design of any selected alternative. State of Colorado drainage design standards will be applied to achieve results that will not increase or significantly change the flood elevations and/or limits.
WATER QUALITY				
Water pollutants	Currently there are no BMPs in place to address the existing and expected increase in pollutant loadings from I-25. As a result, further water quality degradation would be anticipated in the Arkansas River and Fountain Creek as well as the surrounding wetlands and other surface waters.	Increases in impervious surface and additional traffic on I-25 will generate more pollutants regardless of alternative. BMPs in compliance with the Colorado Department of Public Safety (CDPS) Municipal Separate Stormwater Sewer System (MS4) permit requirements are designed to decrease the amount of pollutants actually entering the waters and are expected to lower the amounts of pollutants when compared to the No Action Alternative.		100 percent of all stormwater runoff that falls within CDOT right-of-way will be captured and treated with Tier 1 BMPs (described in more detail in Section 3.15 Water Quality) prior to returning to waterway. Nonstructural BMPs (such as pesticide guidelines) will be employed. Water quality signage near receiving streams will be considered.

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Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Pervious surface	No changes to current conditions.	Increase impervious surface by 26 acres (75 percent increase) in Segment 1.		Water quality ponds in compliance with the CDPS MS4 permit requirements will be placed adjacent to I-25 to treat pollutants from increased impervious surface area. The sizing and design of these ponds will be refined during the final design. Other BMPs will be evaluated during final design. Mitigation measures are described in more detail in Section 3.15 Water Quality .
		Increases impervious surface by 19 acres (87 percent increase) in Segment 2. Increases impervious surface by 28 acres (76 percent increase) in Segment 3.	Increases impervious surface by 20 acres (92 percent increase) in Segment 2. Increases impervious surface by 24 acres (65 percent increase) in Segment 3.	
Construction impacts	No changes to current conditions.	Removes vegetation and creates bare surfaces during construction that may create erosion and sedimentation issues. All highway runoff will be collected and treated to the level required by the New Development and Redevelopment Program. BMPs can be constructed, where appropriate, to intercept, divert, collect surface runoff and convey accumulated runoff to an acceptable outlet point and improve water quality over the No Action Alternative.		A CDOT Multi-Sector General Permit for Construction Activities will be required. BMPs (described in more detail in Section 3.15 Water Quality) will be employed to mitigate both short-term and permanent impacts to water bodies as a result of construction.
UTILITIES				
Existing utility lines	No changes to current conditions.	Impacts above and below ground utility lines. Approaches and crosses over storm sewers. Encroaches on alternate coolant water line at the Evraz Rocky Mountain Steel Mills.		During future design efforts, the location of all utilities in the corridor will be confirmed by field investigations, including locating lines below ground. Alternate delivery systems will be provided to ensure uninterrupted service, and lines or stations will be relocated as needed. When appropriate, CDOT will look for opportunities to provide space for new utilities or upgrade existing ones. If, during future design efforts, impacts to potentially historic utility lines are identified, CDOT will engage in Section 106 consultation with the State Historic Preservation Officer and consulting parties regarding the resource.
Natural gas transfer station	No changes to current conditions.	Relocates Xcel Energy's south town natural gas transfer station.		

EXHIBIT ES-7

Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
Bessemer Ditch	No changes to current conditions.	Requires widening of the existing box culvert over Bessemer Ditch.	Requires a new crossing for I-25 over the Bessemer Ditch.	CDOT will negotiate an agreement—through purchase of either a temporary or a permanent easement—from the Bessemer Ditch Company for the new roadway structure over the irrigation ditch under the Modified I-25 Alternative or for the widening of the existing box culvert that encroaches on the ditch in the Existing I-25 Alternative.
ENERGY				
Energy consumption (Operations)	Energy will continue to be expended for automobile, truck, and bus transportation.	On a daily basis, the difference in energy use between the Build Alternatives and the No Action Alternative is negligible.		None needed.
Energy consumption (Construction)	Energy will continue to be expended for maintenance.	Construction of the 80.38 total lane miles requires 1,899,000 million Btu(s).	Construction of the 90.18 total lane miles requires 2,194,000 million Btu(s).	To the extent practical, CDOT will implement sustainability practices into the project planning, construction, and maintenance to reduce energy use. Potential mitigation measures are described in more detail in Section 3.17 Energy .
NOXIOUS WEEDS				
Invasive species, the Federal Noxious Weeds Act	Noxious weeds currently present in the project area would continue to grow and spread, although they would be managed through standard CDOT maintenance operations within CDOT ROW.	Ground disturbance and other construction activities in the project area may expand areas already infested with noxious weeds, may spread weeds to adjacent land as well as to wetland and riparian habitats nearby, and may introduce new weed species to the project area. Construction activities in the project area will cause a lot of vegetation removal and ground disturbance, which may potentially provide opportunities for noxious weed eradication or control if properly managed and reseeded.		Prior to the start of construction activities, CDOT will develop and implement a Noxious Weed Management Plan that incorporates herbicides, mechanical removal, and potential biological controls (in accordance with the Colorado Noxious Weed Act) to control and prevent weed infestation and spread. During construction, standard BMPs (described in more detail in Section 3.18 Noxious Weeds) will be used to observe, treat, control and/or remove noxious weeds from the disturbed area in accordance with the Noxious Weed Management Plan.

EXHIBIT ES-7

Summary of Impacts of Project Alternatives and Mitigation Approach

Resource	Impacts and Benefits			Mitigation Approach
	No Action Alternative	Existing I-25 Alternative	Modified I-25 Alternative	
				Disturbed areas will be reclaimed immediately after construction. After construction, CDOT ROW will be managed through standard CDOT maintenance operations. Fertilizer will not be used in seed areas. All construction equipment will be washed thoroughly.
PALEONTOLOGICAL RESOURCES				
Fossil remains	No changes to current conditions.	Neither of the Build Alternatives would impact any known significant paleontological resources.		Although unlikely, if any fossils or other paleontological resources are found anywhere in the project area during construction, construction activities will be halted and the CDOT staff paleontologist will be contacted immediately to assess the significance of the find and make further recommendations.
SOILS AND GEOLOGY				
Geologic hazards and soils	The No Action Alternative would not disturb any geologic hazards or soils.	The Build Alternatives have the potential of encountering geological hazards or disturbing unstable soils that would require mitigation prior to construction.		A detailed geotechnical and soils analysis of the subsurface will be required during the final design process to determine the structural stability and load-bearing capacity of geology and soils in the study area.

Sources: CDOT Project Team, 2010.

BFE = Base Flood Elevation

BMP = best management practice

Btu = British thermal unit

CDOT = Colorado Department of Transportation

CDPHE = Colorado Department of Public Health and Environment

CDPS = Colorado Discharge Permit System

EO = Executive Order

EPA = U.S. Environmental Protection Agency

I-25 = Interstate 25

LOMR = Letter of Map Revision

MMP = Materials Management Plan

MS4 = Municipal Separate Storm Sewer System

MSAT = mobile source air toxics

NAAQS = National Ambient Air Quality Standards

PM₁₀ = particulate matter of 10 microns in diameter or smaller

REC = recognized environmental condition

ROW = right-of-way

US = United States Highway

VMT = vehicle miles traveled